

HEALTH & SAFETY POLICY

MDN UK LTD

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SECTION 1 HEALTH AND SAFETY POLICY STATEMENT

It is the Company's policy that its operations shall be conducted in such a way as to ensure, so far as is reasonably practicable, that the health, safety and welfare of its employees and of any other person who may be affected by its operations are protected. This Policy will be actively pursued by the Directors and Managers and the company is committed to the prevention of injury and ill health.

The Company requires that a high standard of safety, health and welfare shall be achieved and consistently maintained both on site and at the Company's offices.

It is imperative that every employee familiarises him or herself with the content of this policy. Its effectiveness can only come from the combined efforts of us all. We expect every employee to give their full commitment and cooperation to the implementation of this policy.

The Company acknowledges the fact that safety and operational efficiency are complementary and that the use of safe working practices and accident prevention techniques are a most important responsibility of management.

The requirements of the Health and Safety at Work etc. Act 1974, and the Management of Health and Safety at Work Regulations 1999 and all legislation relevant thereto shall be regarded as the minimum standard of health, safety and welfare to be achieved and the company will comply with all legal and other identified requirements relating to its Occupational Health and Safety hazards.

This company will allocate sufficient resources to enable the Policy to function effectively. An annual review shall be conducted to determine the resources required to implement this policy. Planning and organising is an ongoing activity within the business. Our procedures are certificated to ISO 45001 and are continually reviewed in order to ensure continuous improvements to our procedures and performance. The reviews shall identify the human and financial resources required to implement our policy.

Protective clothing and equipment shall be made available to employees, and shall be used by all employees when the nature of the work being carried out requires the use of such protective gear in the interests of health and safety. Personal Protective Equipment (PPE) shall only be used as a workplace precaution and as the last resort.

All employees shall be encouraged to submit suggestions and ideas for improving the general standards of health, safety and welfare.

Employees have a duty under Section (7) of the Health and Safety at Work etc Act 1974 to take reasonable care for their own safety and the safety of any other person who may be affected by their acts or omissions and also to co-operate with the Company in its arrangements to perform or comply with statutory safety obligations which include adherence to the Company's Safety Policy.

All employees, regardless of status, found to be deliberately and consistently negligent in their performance of the Company's Policy on Health, Safety and Welfare may be subject to instant dismissal.

This Policy will be reviewed annually or revised and updated when new legislation or guidance is introduced.

Signed:

Dated:

SECTION 1 ENVIRONMENTAL POLICY STATEMENT

MDN UK LTD Limited is committed to leading the industry in minimising the impact of its activities on the environment.

The key points of its strategy to achieve this are:

- Meet or exceed all the environmental legislation that relates to the Company.
- Use an accredited program to offset the greenhouse gas emissions generated by our activities
- Minimise waste by evaluating operations and ensuring they are as efficient as possible.
- Source and promote a product range to minimise the environmental impact of both production and distribution.
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- Minimise toxic emissions through the selection and use of its fleet and the source of its power requirement.
- Continually improve our environmental performance.
- Develop and maintain environmental management programs with objectives and targets to minimize adverse environmental impacts.
- Comply with all applicable environmental, health, and safety laws, regulations, and other requirements.
- Implement effective pollution prevention and waste minimization programs to reduce, reuse, and recycle materials.
- Ensure that energy and water are used responsibly and conserved through innovative practices and procedures.
- Provide all institute staff with the knowledge and tools needed to meet the goals of this policy and to actively participate in efforts to prevent negative environmental impacts.
- Measure progress toward our environmental goals.

SECTION 1 ENVIRONMENTAL POLICY

Environmental Management System:

MDN UK LTD will establish and maintain an Environmental Management System (EMS) that complies with relevant environmental laws, regulations, and standards. The EMS will set objectives and targets for environmental performance improvement and regularly monitor and review our progress.

Resource Conservation:

We will strive to conserve natural resources and minimize waste generation by implementing practices such as reducing energy consumption, water conservation, and waste reduction and recycling programs. We will also look for opportunities to increase energy efficiency and utilize renewable energy sources whenever possible.

Pollution Prevention:

MDN UK LTD is committed to preventing pollution in all forms. We will implement measures to minimize air, water, and soil pollution, and we will properly handle and dispose of hazardous materials in accordance with applicable regulations.

Biodiversity Conservation:

We recognize the importance of biodiversity conservation and will work to protect and preserve the natural habitats and ecosystems in which we operate. We will strive to minimize our impact on local wildlife and biodiversity through responsible land management practices.

Community Engagement:

We will actively engage with our local communities and stakeholders to raise awareness about environmental issues and seek input on our environmental performance. We will also support environmental initiatives and participate in community environmental events.

Employee Training and Engagement:

MDN UK LTD will provide ongoing training and education to employees on environmental awareness and best practices. We will encourage employee involvement in environmental initiatives and recognize and reward employees who demonstrate a commitment to sustainability.

Monitoring and Reporting:

We will regularly monitor and evaluate our environmental performance and report on our progress towards achieving our environmental objectives and targets. We will be transparent in communicating our environmental practices and performance to stakeholders and the public.

Review and Improvement:

This Environmental Policy will be reviewed periodically to ensure its continued effectiveness and relevance. We will continuously seek opportunities for improvement and innovation in our environmental management practices.

Conclusion:

MDN UK LTD is committed to promoting environmental stewardship and sustainability in all aspects of our business. By implementing this Environmental Policy, we aim to reduce our environmental impact, protect natural resources, and contribute to a cleaner and healthier environment for future generations.)

The manager in coordination with the health and safety department shall be responsible for administering and monitoring this policy through implementation of an Environmental Management System (EMS). This policy will serve as the framework for setting and reviewing the business's environmental goals, objectives, and targets. **MDN UK LTD** will coordinate an annual review of this policy and develop recommendations for improvements and updates as needed. Changes to this policy will be communicated to all employees and other staff working on behalf of the institute

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Signed:

Dated:

HEALTH & SAFETY POLICY REVIEWS

Reviews of the Health and Safety Policy shall be carried out by the Managing Director and the Safety Advisor.

Review Date	Reviewed by
04/06/2025	Bejay Makwana (CMIOSH)

SECTION 2 INDIVIDUAL RESPONSIBILITIES

2.1-MANAGING DIRECTOR

- Shall require a positive approach to Safety at all management levels.
- To ensure that staff receive adequate Health and Safety education and training commencing with induction training.
- Maintain the Company's Safety Policy on a progressive basis, ensuring that the methods of accident prevention and internal procedures are kept up to date.
- Maintain close contact with the health and safety advisor.
- Know the requirements of the Health and Safety at Work etc Act 1974, and all other relevant statutory requirements; this will be achieved via briefings, and newsletters regarding safety updates.
- Establish clear health and safety objectives and monitor progress toward achieving them.
- Set a personal example during monitoring inspections by following safe working practices and recognising and praising positive behaviours.
- Ensure adequate resources (financial, personnel, equipment) are allocated to implement health and safety measures effectively.
- Engage with employees, safety representatives, and other stakeholders in safety-related discussions.
- Regularly review health and safety performance through audits, incident reports, and inspections.
- Oversee investigation of accidents and incidents to identify root causes and prevent recurrence.

2.2-DUTIES OF DIRECTORS AND OTHER SENIOR MANAGERS

Shall implement this Policy by:

- Making full provision for safe methods of working and adequate welfare facilities at the tender stage on all contracts.
- Ensuring the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 and the CDM Regulations 2015 are followed and the necessary health and safety plans, risk assessments and method statements are produced and brought to the attention of the relevant people.
- Ensuring staff at all levels receive appropriate training.
- Monitoring health and safety performance through site meetings, reacting to safety adviser reports, and responding to actual site conditions observed when on routine site inspections.
- Holding regular meetings with employees and other site operatives to receive comments and suggestions on ways in which health and safety performance can be improved.
- Liaising with the Health and Safety Advisor and taking charge of problems which cannot be adequately controlled/concluded at site level, especially with regards to control of sub-contractors.
- Setting a good personal example and having adequate knowledge of health and safety legislation relating to our work.
- Implementing regular feedback sessions or surveys to gauge employee perceptions regarding safety and environmental practices.
- Ensure that any changes to policies or procedures are communicated effectively to all employees to maintain awareness and compliance.

2.3-DUTIES OF SITE MANAGERS (AND OTHER PERSONS IN CONTROL OF THE SITE)

The duties are to:

- Understand the **MDN UK LTD** Health and Safety Policy and ensure it is brought to the attention of all employees, particularly new starters, through induction talks if necessary.
- Have adequate knowledge of, and observe the requirements of the construction regulations and other legislation and codes of practice; ensuring that all statutory registers and records are maintained and that persons under your control are adequately trained to enable them to carry out their duties.
- Ensure that the necessary risk assessments have been carried out and recorded and that detailed method statements adopting "best working practice" approach is used for high risk activities.
- Ensure that precise instructions are given to operatives, detailing what precautions/actions must be taken to minimise risk.
- Ensure that new employees, apprentices, young persons or occasional site workers are aware of the dangers and what precautions they must take.
- Ensure that adequate arrangements are made with regards to fire precautions, first aid equipment trained first aiders or appointed persons, and the procedures, to be followed in an emergency are all in place.
- In planning the site layout and work, make adequate provision for welfare facilities. Organise the site so that work carried out to the correct standard with minimum risk to operatives and other persons, equipment, materials, and members of the public, both during and outside site hours. Encourage employees to be pro-active in developing a positive approach to health and safety performance.
- Carry out (or arrange for others to carry out) site induction talks for new arrivals onto site.

- Ensure any accident or incident is reported in accordance with the **MDN UK LTD** Safety Management System.
- Set a good personal example at all times.

2.4-DUTIES OF THE HEALTH AND SAFETY ADVISOR

- To encourage a pro-active approach to health and safety matters and a positive attitude to risk management functions.
- To keep themselves up to date with current legislation and best working methods and to disseminate this information throughout the company. At all times they must be prepared to assist management in whatever way they can with regards to health and safety.
- With regards to sites, they should carry out regular inspections and report on their findings. In addition they should assist the Contracts Manager and site manager by advising on working methods and training requirements.
- If in their opinion they are confronted with a risk of imminent danger to life, then they should take whatever action they consider necessary and report the occurrence and action taken to the Contracts Manager, and if need be, the Managing Director.

2.5-DUTIES OF OFFICE MANAGEMENT

Your duties are to:

- Understand the **MDN UK LTD** health and safety policy and ensure it is brought to the attention of all employees, particularly new employees and temporary employees, through induction talks.
- Have adequate knowledge of the Health and Safety at Work etc. Act 1974 and those persons under your control are adequately trained to enable them to carry out their duties.
- Ensure that adequate arrangements are made with regards to fire precautions, first aid equipment, trained first aiders or appointed persons, and the procedures, to be followed in an emergency are all in place.
- Ensure that adequate arrangements are made for employees using Display Screen Equipment (DSE) with regards to workstation, rest periods, etc.
- Ensure that adequate arrangements are made for the provision for welfare facilities.
- Carry out (or arrange for others to carry out) induction talks for new employees or temporary employees.
- Ensure any accident/incident is reported in accordance with Business name Safety Management System.
- Set a good personal example at all times.

2.7-QUANTITY SURVEYORS

Roles and Responsibilities

- To have read and understand the Company Policy for Health, Safety and Welfare. Ensuring that it is brought to the attention of any employees under your control.
- Ensure that all Sub - Contractors are asked to provide full information on any hazards associated with the equipment or materials supplied and this information is passed to the relevant Contracts Manager with control measures being implemented.
- Ensure that Sub - Contractors are assessed for competence and resources regarding health and safety, that they have received a copy of the Company's Safety Rules and Requirements as well as a copy of the Company Policy Statement.
- Undertake and retain evidence of a Sub-Contractor evaluation to include a review of their Health and Safety Policy and Procedures ensuring they meet their legal responsibilities. Obtain agreement that they will conform with The Company's Policy and Codes of Practice whilst on Company sites.
- Rates negotiated for work carried out by Sub - Contractors must include all necessary safety precautions and, where appropriate, separate rates should be included for health and safety control measures.
- Ensure that Sub - Contractors carrying out any of the operations listed below shall provide as a minimum a written risk assessment and Method of Work Statement:
- *Demolition, Roof work or vertical cladding, Structural steel erection, Major earthworks, Asbestos removal, lifting operations and any other specific area on a project where it is deemed necessary.*
- Lead by example regarding positive health and safety behaviours at all times.

2.7-DUTIES OF ALL SITE STAFF AND OPERATIVES

The Health and Safety at Work etc. Act 1974 requires all employees and self-employed persons to take reasonable care of themselves and others who may be affected by his/her acts or omissions, and to co-operate with **MDN UK LTD** by observing written policies and procedures and so enabling the company to comply with its statutory duties.

In particular, you can assist by:

- Taking a pro-active role in assessing the health and safety performance of **MDN UK LTD** and suggesting ways (via your manager) in which improvements can be made.
- Using the appropriate protective equipment (i.e. head protection, eye protection, hearing protection, safety footwear, high visibility waistcoat or jacket etc.) if required for the job.
- Keeping personal tools and equipment in good condition.
- Reporting all defects in plant, equipment, together with any unsafe acts to your immediate supervisor.
- Not operating any plant or carrying out any task for which you have not been trained or are unfamiliar.
- It is important that you feel capable of doing the task in which you are involved. If you have any doubt you should inform your immediate supervisor.

Employees and Labour only Contractors Roles and Responsibilities

All employees have responsibilities under The Health and Safety at Work Act 1974 and other relevant legislation.

This means that:

- 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.
- As regards to any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with them so far as it is necessary to enable that duty or requirement to be performed or complied with.
- No person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare in pursuance of any of the relevant statutory provisions.
- Employees are reminded that a breach of safety procedures could possibly result in disciplinary action being taken by the Company, and that provision is made in Law for certain breaches to be actioned by the Health and Safety Executive. In simple terms this means, employees shall:
- Read and understand the Company Policy and Procedures for Health, Safety and Welfare and undertake work in accordance with its requirements.
- Use the correct tools and equipment for the job.
- Maintain tools and equipment in a good condition.
- Correctly wear specified PPE at all times. The PPE provided shall be suitable and sufficient for the tasks being undertaken. Store PPE in an appropriate manner so not to damage or degrade the equipment.
- Work in a safe manner at all times. Do not take unnecessary risks that could endanger yourself or others. If possible, remove site hazards yourself, e.g., remove or flatten nails sticking out of timber, tie unsecured access ladders, etc.
- Warn other employees, particularly new employees, and young people, of particular known hazards.
- Do not use plant or equipment for work for which it was not intended, or if you are not trained or competent to use it.
- Report any damage to plant or equipment to your supervisor, where appropriate 'quarantine' damaged items to prevent use.
- Do not play dangerous practical jokes or "horseplay" on site.
- Report to your supervisor any person seen abusing welfare facilities provided.
- Report any injury to yourself that results from an accident at work, even if the injury does not stop work.
- Suggest safer methods of working.
- If any employee, labour only contractor or contractor has any concerns over the health or safety of any task, location, or activity they should immediately stop the particular task or activity or not enter the location. Make immediate contact with their supervisor, advise them of the concerns and seek advice and guidance. Work should not recommence until the concerns have been satisfactorily resolved. In the event of dispute or ongoing concerns the company will seek independent advice and guidance from an appropriate specialist or a member of senior management who has sufficient competence to address the matter.

Sub-Contractors

Roles and Responsibilities

All Sub - Contractors are expected to comply with the Company Policy for Health, Safety and Welfare and must submit their own Health and Safety Policy to the Company, for verification.

- Sub - Contractors will receive a copy of the Company's Safety Rules and Requirements prior to commencement on site. The Sub - Contractors operatives are expected to be fully aware of what is required of them whilst working on Company sites.
- Sub - Contractors should provide relevant assessments (Design, Risk, COSHH, Noise and Manual Handling) as appropriate and method statements if necessary for review prior to commencement on site.

- All work must be carried out in accordance with the relevant statutory provisions. Considering the safety of others on the site and the public. Sub - Contractors employees must comply with any safety instruction given to them by the Site Manager.
- All plant and equipment brought onto site by Sub - Contractors must be safe and in good working condition, fitted with any necessary guards and safety devices, with any necessary statutory inspection certificates available for checking. All operatives must be adequately trained in the use of such plant and equipment and, where appropriate, provide proof of competence.
- Sub - Contractor employees are not permitted to alter any scaffold provided for their use, or use, or interfere with any plant or equipment on the site, unless authorised. Where Sub - Contractors are required to hire or erect scaffolding they shall ensure that a suitably trained and certificated person installs and inspects it at weekly intervals with the appropriate entry being made in the Scaffold Inspection Register.
- No power tools or electrical equipment of greater than 110 volts may be brought onto site. All transformers, generators, extension leads, plugs and sockets must be to the latest British Standards for industrial use, and in good condition. All such equipment must be regularly tested for safe working and suitably tagged in accordance with the requirements of this Policy.
- Any injury sustained or damage caused by Sub - Contractors' employees must be reported immediately to the Site Manager.
- Sub - Contractors informed of any hazards or defects noted will be expected to take immediate action. Sub -Contractors will provide the Site Manager with the name of the person they have appointed as Safety Supervisor.
- Safety Advisers have the Company's authority to stop work at any time that they consider that there is an imminent risk of serious injury. Sub - Contractors informed of any hazards or defects noted during these inspections will be expected to take immediate action to rectify the issue raised.
- Sub - Contractors must provide suitable welfare facilities and first-aid equipment in accordance with the Regulations for their employees unless arrangements have been made for Sub - Contractors' employees to have the use of the Company's facilities. Sub - Contractors will be required to prove, when appropriate, that at least one of their workforces on site is a suitably trained first aider.
- Any material or substance brought on site which has Health, Fire or Explosion risks must be used and stored in accordance with the Regulations and current recommendations, information relating to that material or substance must be provided to the Site Manager and any other person who may be affected prior to said material or substance being brought on to Site.
- Sub - Contractors are particularly asked to note that workplaces must be kept tidy with all debris, waste materials, etc. cleared as work proceeds using the appropriate waste routes.
- It is the policy of this Company that all operatives, Sub - Contractors, visitors, etc. on the Company's sites will always wear safety helmets other than in specifically designated 'no risk' areas by the Site Manager. Sub -Contractors will be required to provide and wear and/or use any appropriate items of protective clothing and equipment required for the process in which they are engaged.

2.8-QUALITY MANAGEMENT PLAN

This Quality Management Plan outlines the approach and activities to be undertaken to ensure quality standards are maintained throughout the construction project. It is the responsibility of all team members to adhere to the plan and take ownership of quality management.

Quality Objectives

To deliver a project that meets or exceeds client expectations

To ensure compliance with all relevant regulations and standards

To continuously improve processes and procedures for better project outcomes

To prioritize safety, environmental protection, and sustainability in all construction activities

Quality Management Team

Managing Director: Responsible for overall quality management and ensuring compliance with the plan

Quality Engineer: Responsible for monitoring quality standards, conducting inspections, and identifying areas for improvement

Site Supervisor: Responsible for implementing quality control measures on-site and ensuring all work meets quality standards

Subcontractors: Expected to adhere to quality standards set by the construction company

Quality Control Procedures

Regular inspections will be conducted at various stages of the construction project to ensure quality standards are being met

Non-conformance reports will be issued for any deviations from quality standards, with action plans developed to address and resolve issues

Quality documentation will be maintained and updated regularly to track progress and identify areas for improvement

Quality Assurance Measures

Training and development programs will be implemented to ensure all team members are aware of quality standards and procedures

Quality audits will be conducted periodically to assess the effectiveness of quality management processes and identify areas for improvement

Client feedback will be sought regularly to gauge satisfaction levels and make necessary adjustments to improve quality

Communication and Reporting

Regular meetings will be held to discuss quality management issues, share updates, and address any concerns

Quality reports will be generated at key milestones in the project and shared with stakeholders to ensure transparency and accountability

Document Control

A document control system will be in place to manage all quality-related documents, ensuring version control and easy access for team members

All quality-related documents will be stored securely and archived according to project requirements

Risk Management

Risk assessments will be conducted regularly to identify potential threats to quality standards and develop mitigation strategies to address them

Contingency plans will be in place to handle any unforeseen events that may impact quality management processes

Continuous Improvement

Lessons learned from previous projects will be incorporated into future quality management practices to enhance project outcomes

Feedback from team members, clients, and other stakeholders will be welcomed and used to drive continuous improvement in quality management processes

Conclusion

This Quality Management Plan serves as a guide for all team members to uphold quality standards and deliver a successful construction project. It is the responsibility of every individual involved in the project to prioritize quality and work together towards achieving the set objectives.

SECTION 3 ARRANGEMENTS

3.1.0-CDM

3.1.1-CDM DUTIES

Our work is often subject to the current edition of the Construction (Design & Management) Regulations. The purpose of the information below is to outline our arrangements for complying with our responsibilities as duty holders under CDM.

CLIENT

When **MDN UK LTD** are acting as Client the Company will:

- Prepare a client brief to explain to others what the project is about and the requirements before, during and after the build.
- Make suitable arrangements for managing the project - to ensure that, throughout the planning, design and construction of a project, adequate consideration is given to the health, safety and welfare of all those affected and involved in the construction work.
- Select the project team and formally appoint duty holders - If more than one contractor will be working on the project then the company will appoint a Principal Designer and a Principal Contractor in writing. If this is not done, then the company will take on these roles and associated legal duties.

Appointees must:

- have the necessary capabilities and resources
- have the right blend of skills, knowledge, training, and experience
- understand their roles and responsibilities when carrying out the work

Provide information to help with design and construction planning - Prepare and pass on pre-construction information at the earliest opportunity to designers and contractors, to inform them of any risks that may have an impact on the design of the building or structure, as well as on its construction and future use.

Notify the project to the enforcing authorities, where required if the project is expected to last longer than 30 working days and have more than 20 workers working on the project at any one time or exceed 500 person days, the project is notified to the HSE on the Form F10 electronically.

Check that the Principal Designer is carrying out their duties

If the Company has any involvement with any design element on the project, then the Duties on the Designer under the above Regulations will also apply

During the construction phase

- Ensure the construction phase plan is in place
- Ensure welfare facilities are in place
- Ensure the management arrangements are working – clients are required to ensure that the arrangements made for managing health and safety during construction are working successfully and be satisfied that the principal contractor is complying with their duties.

Post Construction

- Check completion and handover arrangements
- Check that the health and safety file has been prepared - at the end of the project, ensure that the Principal Designer provides the company with the health and safety file.
- Note- On projects where the Principal Designer's role has finished before the end of the project, the Principal Contractor will have taken on responsibility for the file.
- Maintain and make available the health and safety file - Once the project is completed, the Client or the owner of the building must keep the health and safety file, this can be in an electronic format, on paper, on film or in any other durable form.

PRINCIPAL DESIGNER

The Principal Designer responsibilities under CDM include to:

- Provide the Client with advice and assistance to enable him to fulfil his duties
- Assist the Client with notification of the project to the HSE (using form F10) and provide the Client and Principal Contractor with a copy
- Ensure that Designers co-operate and take health and safety into account when preparing designs
- Establish procedures to ensure communication and information flow between all duty holders
- Identify what pre-construction information is needed and obtain and pass this to all persons that need to know
- Produce the Pre-Construction Information and distribute to the project team.

- Advise the Client about the suitability of the Construction Phase Health and Safety Plan.
- Liaise with the Principal Contractor regarding changes to designs
- Collect and keep up-to-date information for the Health and Safety File and ensure that the file is passed to the Client when the project is complete

PRINCIPAL CONTRACTOR

When **MDN UK LTD** are the Principal Contractor for a CDM project we will:

- Receive pre-construction information from the Principal Designer and use this to develop a Construction Phase Health and Safety Plan, the relevant points of which will be communicated to all Contractors
- Devote adequate time and resources to the management of health and safety
- Ensure that a copy of form F10 is displayed on site
- Check the competence of Contractors appointed to work on the project. This will include the examination of Contractors' risk assessments and method statements to ensure adequacy
- Manage health and safety during the construction phase, ensuring co-operation between all Contractors and the incorporation of all Contractors' information on health and safety matters
- Give reasonable directions to contractors, so far as is necessary, to enable us to carry out our duties as Principal Contractor
- Work to the plan agreed at tender award stage, except where circumstances require changes. When such changes are needed, we will agree these with the Client and/or Principal Designer before taking action
- Advise the Principal Designer of any relevant health and safety matter that needs to be recorded
- Ensure that suitable welfare facilities are provided throughout the project
- Provide Contractors with information about training requirements for persons working on the project
- Ensure that all persons working on the project attend Site induction before starting work
- Ensure that site safety rules are complied with
- Ensure that a Site Manager/Supervisor is on site to consider the views of all workers
- Ensure co-ordination of emergency procedures throughout the duration of the construction phase
- Ensure co-ordination of shared equipment and facilities
- Ensure site security by excluding all unauthorised persons
- Collect information needed for the Health and Safety File and ensure that this is passed to the Principal Designer

CONTRACTOR

Where **MDN UK LTD** are a Contractor on any construction project we will:

- Provide the Principal Contractor (where more than one contractor) with any information he needs to develop the Construction Phase Health and Safety Plan and co-operate with him to ensure its implementation
- Provide the Principal Contractor with details of any subcontractors we intend to use
- Check that a Principal Designer has been appointed and the project notified to the HSE before starting work (where more than one contractor)
- Ensure that all persons working for us are suitably trained
- Appoint a competent Supervisor to liaise with the Principal Contractor and supervise and monitor our work activities
- Ensure that all persons working for us attend Site Induction before starting work
- Provide persons working for us with any information they need in order to work safely and without putting their health at risk
- Devote adequate time and resources to the management of health and safety on site
- Make adequate arrangements for the safety of our employees in any high-risk areas identified by the Principal Contractor
- Comply with all reasonable directions from the Principal Contractor
- Inform the Principal Contractor about any problems with the Construction Phase Health and Safety Plan or health and safety procedures
- Provide the Principal Contractor with any information needed for the Health and Safety File
- Inform the Principal Contractor about any accident or incident that caused, or could have caused, injury or damage

3.1.2-PROTECTION OF THE PUBLIC

For construction projects nearby public areas it is vital sufficient security must be installed to prevent access, this will be in the form of temporary hoarding or security fencing with adequate signage installed. Site security staff will be used if needed (gateman, security wardens) in particular out of normal working hours. CCTV or alarms should be installed if deemed necessary.

All resources will be made available at all times to prevent incidents/accidents when working adjacent to areas occupied or used by the public.

All employees working in these areas will be given adequate information and resources to carry out these works in a safe and effective manner.

All necessary signage and protective measures will be made available to ensure no harm comes to members of the public where at all possible.

If a member of the public is injured as a result of the Company's activities this should be reported to the local enforcing authority.

3.2.0-RISK ASSESSMENT AND CONTROL MEASURES

3.2.1-RISK ASSESSMENTS AND METHOD STATEMENTS

Risk assessments

MDN UK LTD shall ensure specific Risk Assessments are available for all activities carried out by operatives prior to works commencing. All personnel including employees, subcontractors and members of the public will be considered in the risk assessment procedure.

While carrying out the risk assessment we will consider the hazards (something with a potential to cause harm) and the risks (likelihood of the accident happening and severity of injury or harm). The procedure to be used is based on a scale of Low, Medium or High considering likelihood and severity to calculate the risk factor.

Where high risks cannot be mitigated sufficiently by workplace precautions, a safety method statement, detailing in sequence, the safe system of work to be followed, will be produced.

Subcontractors are required to provide their risk assessments and method statements to **MDN UK LTD** for review and comment. These documents shall be used to monitor subcontractor performance on site.

All operatives will read and sign the risk assessments and method statements prior to works.

Method statements

Method Statements

It is our intention to prevent injuries and ill health to employees and others affected by our activities. To do this we recognise that we must adopt safe systems of work. Therefore, assessments will be carried out to identify risks (see Risk Assessments). Based on these, safe systems of work will be prepared and used. The safe systems of work to be used on a particular site will be communicated to employees and Clients and/or Principal Contractors by the use of written Method Statements.

Where work is subcontracted, we will not allow the work to commence until we have received and approved a Method Statement from the subcontractor. Each Method Statement will include, but will not be limited to, the following information:

- Name of site
- Name of Client, Principal Designer, Principal Contractor and any subcontractors
- Location of work
- Details of work, including work sequence
- Any special controls to be used
- Supervisory arrangements
- Competence of those carrying out the work
- Emergency Procedures
- First aid arrangements
- Special personal protective equipment to be used
- List of plant, equipment and authorised users
- Method of agreeing variations from an original Method Statement, if necessary
- Signature of the person preparing the Method Statement and date
- Signature of the person/s receiving the Method Statement and date

RESPONSIBILITIES

Responsibilities for writing Method Statements for work carried out by us are identified in the organisation and responsibilities section of this Policy.

The Site Manager is responsible for obtaining and approving subcontractors' Method Statements. Supervisors are responsible for bringing any significant findings of Method Statements to the attention of the persons concerned and for ensuring that procedures described in Method Statements are followed.

All employees and subcontractors are required to follow the Method Statements for the work they are carrying out

3.2.2-PERMIT TO WORK

Permits to Work

Certain high-risk activities require additional controls to ensure that dangerous situations are avoided. For any such high-risk activity a Permit to Work must be obtained from the Site Manager. It is the

responsibility of the person engaging contractors to work on the premises to advise the contractor about types of work for which a Permit to Work will be required.

TYPES OF WORK REQUIRING A PERMIT

A Permit to Work is required for the following:

- Hot Work
- Confined Space Entry
- Electrical Work
- Work at Height / Roof Work

Persons engaged in any of the above will not be allowed to commence work until they are in possession of a signed permit appropriate to the type of work.

HOT WORK

A Hot Work Permit is required for the following:

- Oxy-acetylene or oxy-propane cutting
- All types of welding
- Brazing/soldering
- Propane or butane gas/aerosol torches
- Any grinding equipment in areas where highly flammable liquids or vapours may be present
- Use of electrically powered hammers, drills, saws and lights and pneumatic
- Drills/hammers where highly flammable liquids or vapours may be present
- Any other operation producing heat, sparks or flames where there is a risk of fire or explosion

CONFINED SPACES

A confined space entry permit is required for work in any vat, tower, tank, flue, pipe, duct, pit or similar place, open or closed, where there is likely to be risk of:

- A dangerous or toxic liquid, gas, fume, vapour, dust
- A deficiency of oxygen
- A fire or explosion
- Or whereby it is difficult to evacuate an injured person from the work area

ELECTRICAL WORK

All work on electrical installations is subject to control by a Permit to Work, irrespective of the voltage concerned. All work must be carried out by:

- A professional, qualified electrical engineer
- A contractor approved by the National Inspection Council for Electrical Installation
- Contracting (NICEIC)
- A member of the Electrical Contractors Association (ECA)

WORK AT HEIGHT / ROOF WORK

A Work at Height Permit is required for the following:

- Roof access, roof work or work on a fragile roof
- Window cleaning above the ground floor
- Any construction or maintenance work where there is a risk of injury from falling
- Working above plant, processes, persons or vehicles

3.3.0-TRAINING AND COMPETENCY

3.3.1-TRAINING AND EDUCATION

Safety education and training is regarded as an indispensable ingredient of an effective health and safety programme. It is essential that every employee in the organisation is trained to perform their job effectively and safely. It is the opinion of the management that if a job is not done safely then it is not done effectively.

All employees will be trained in safe working practices and procedures upon commencement of employment and prior to being allocated any new role. Training will include information, instruction and advice on the Company procedures and the use and maintenance of personal protective equipment and emergency contingency plans.

Safety training will be provided by experienced training instructors from commercial training providers, e.g. WPS, CITB, Construction Health and Safety Group, etc. The training may be on site or at a commercial training centre.

Training records are maintained at Head Office within each individual employee's personal record.

The training matrix will be reviewed:

- Annually: A comprehensive review at least once a year helps ensure that all training requirements are up to date and that employees maintain necessary certifications.
- After New Regulations or Standards: If there are changes in industry regulations, compliance standards, or organisational policies, the training matrix should be reviewed to incorporate any new training requirements.
- Following Employee Onboarding: After new employees complete their onboarding process, the matrix should be reviewed to ensure they have received all necessary training for their roles.
- After Employee Promotions or Role Changes: When employees are promoted or change roles, their training needs may also change. The matrix should be reviewed to identify any new training requirements.
- Post-Training Evaluation: After significant training sessions or programs, review the matrix to assess the effectiveness of the training and make adjustments as necessary.
- After Incident Review: If there are safety incidents, compliance violations, or other significant events, reviewing the training matrix can help identify gaps in training that need to be addressed.
- In Response to Employee Feedback: Regularly soliciting feedback from employees about their training needs can prompt a review of the training matrix to ensure it aligns with their needs.
- During Performance Reviews: Incorporating training matrix reviews into employee performance evaluations can help identify areas for improvement and development.
- When Implementing New Technologies or Processes: Any time new technologies or processes are introduced, relevant training should be assessed and updated accordingly.
- Regularly Scheduled Reviews Depending on the organisation's needs, you may choose to set specific intervals (e.g., quarterly or bi-annually) for reviewing the training matrix beyond the annual review.

To effectively manage and record key competencies—encompassing Skills, Knowledge, Experience, and Behaviours—for our workforce and subcontractors, we have implemented a comprehensive competency framework. This framework includes regular assessments and evaluations to identify individual strengths and areas for development. We utilise a centralised digital platform where all competency data is recorded and updated, allowing for real-time tracking of employee and subcontractor performance. Training programs and workshops are tailored based on the identified competencies, ensuring our team is equipped with the necessary skills and knowledge to excel in their roles. Additionally, we foster a culture of continuous feedback, encouraging open communication and collaboration to enhance behavioural competencies. Regular reviews and audits of our competency management processes ensure alignment with industry standards and organisational goals, thereby supporting our commitment to excellence and adaptability in a dynamic work environment. The training matrix will be updated and reviewed monthly.

3.3.2-EMPLOYEES

The Managing Director will carry out an annual review of health and safety training and education needs for all levels of staff. In carrying out the review the Managing Director will pay particular attention to persons whose role has changed, possibly due to a change in their scope of work, or possibly due to legislation. Employees taking on board additional responsibility may need additional training.

The education and training needs will be agreed by the directors and budgets allocated. The Managing Director and Health and Safety Advisor will monitor that the training schedule is completed.

3.3.3-PLANT OPERATIVES

All plant operatives will be trained and certificated in accordance with the CPCS training scheme. Additional training will be carried out as required for items such as abrasive wheels, cartridge tools, and other plant and equipment as required. For operatives using mobile tower scaffolds and mobile elevating work platforms they will receive PASMA and IPAF training. Records will be maintained at Head Office.

Subcontractors required to use plant and equipment on site must provide evidence of operator training and procedures for regular testing and inspection of site plant.

3.3.4-SITE INDUCTION TRAINING

The site manager (or his delegated representative) will carry out induction training for all new arrivals to site informing them of the significant risks identified in the health and safety plan together with the site emergency and first aid procedures. He will also cover:-

- The significant risks and precautions to be taken
- The PPE requirements
- Where/how to obtain additional PPE as required
- Details of site emergency procedures
- Details of site welfare arrangements
- Details of any method statements relevant to the actual work the person is involved in
- The site rules in general

Confirmation of the site induction will be recorded in the induction register.

3.4.0-REPORTING AND INVESTIGATING ACCIDENTS AND INCIDENTS

3.4.1-REPORTING OF ACCIDENTS AND DANGEROUS OCCURRENCES

There are a number of reasons why it is essential that all accidents/incidents are recorded and where applicable reported. These include:-

MDN UK LTD requirement to assist in monitoring health and safety performance.

- Legal requirements to report certain specified injuries, ill-health and dangerous occurrences to the Health and Safety Executive (RIDDOR 2013).
- Insurance company requirements to notify them and keep details for potential claims.
- Department of Social Security requirements to keep details of all accidents in the workplace accident book.

Therefore, all accidents and incidents should be recorded in the **MDN UK LTD** accident book, no matter how trivial the incident, and for accidents that result in lost time or damage the **MDN UK LTD** incident report forms should be completed. Each site manager is responsible for ensuring that any accident involving **MDN UK LTD** staff is entered into the accident book and to inform the Managing Director of any such accident.

The following sub sections give detailed guidance on what action should be taken depending on both the nature of the incident and the person who has been injured. Additional guidance can also be obtained from the Safety Management System.

3.4.2-ALL ACCIDENTS AND INCIDENTS

All accidents/incidents which occur on premises under the control of **MDN UK LTD** should be entered in the accident book, no matter how trivial and irrespective of whether the injured person is an employee, self-employed, subcontractor or authorised visitor.

3.4.3-INCIDENTS INVOLVING MEMBERS OF THE PUBLIC, VISITORS AND UNAUTHORISED PERSONS

If any member of the public, visitor or unauthorised person is involved in an incident or is injured, details must be entered in the accident book and the **MDN UK LTD** incident notification form completed. The site manager should also notify the **MDN UK LTD** Managing Director as soon as possible. In doing so the site manager should discuss whether a full investigation is required by the Health and Safety Advisor and action accordingly.

If the incident is such that the injured person has to be taken to hospital (by whatever means) the incident must be reported to the Health and Safety Executive by the quickest means (i.e. telephone) and confirmed within 10 days via the HSE's website reporting system.

3.4.4-INCIDENTS REPORTABLE UNDER RIDDOR

All injuries resulting from accidents on site or in other workplaces, however minor, will be reported by the Supervisor (or Office Manager as appropriate) on the Accident Report form. This applies to injuries received by members of the public, visitors etc. as well as Company employees. Safety Minded Solutions should be advised of any accident involving hospitalisation or resulting in more than three days off work.

In the event of a fatal or major injury to any person, or dangerous occurrence as defined by The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 the Health & Safety Executive must be notified via the appropriate online form;

<http://www.hse.gov.uk/riddor/report.htm>

Safety Minded Solutions should also be notified as soon as possible.

Over-seven-day injuries

This is where an employee, or self-employed person, is away from work or unable to perform their normal work duties for more than seven consecutive days (not counting the day of the accident).

Over-three-day injuries

Employers must keep a record of over three-day injuries. If you are an employer, who has to keep an accident book, the record you make in this will be enough.

Online - Go to www.hse.gov.uk/riddor and complete the appropriate online report form. The form will then be submitted directly to the RIDDOR database. You will receive a copy for your records

Telephone - All incidents can be reported online but a telephone service remains for reporting fatal and specified injuries only. Call the Incident Contact Centre on 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

For an over 7-day injury there is no requirement to phone the HSE immediately but it must be reported within 15 days.

3.4.5-ACCIDENT/INCIDENT INVESTIGATION

All accidents/incidents shall be investigated by the senior managers supported by the safety adviser with the following objectives:

- To determine the root causes to prevent any recurrence.
- Provide adequate information for reporting under RIDDOR.
- To assist the enforcing authorities in their investigation.
- To provide information to the company's insurers in respect of any compensation claim.
- The level of investigation will be determined by the seriousness of the incident but as a minimum shall consider the following:
 - The root causes
 - Who was involved, including any witnesses
 - When did the incident occur
 - Why did it occur
 - What measures must be taken to prevent a recurrence and if these were already in place why were they not followed

3.4.6-HAZARD REPORTING

We operate a hazard reporting system the purposes of which are to:

- Stimulate our employees' interest and involvement in health and safety matters
- Encourage employees to identify hazards and unsafe conditions in their work areas so that action can be taken to prevent incidents
- Maintain written records of actions taken to eliminate hazards and unsafe conditions
- Assist with the monitoring of the effectiveness of our procedures for managing health and safety
- Any employee who observes a hazard or unsafe condition that they are not able to take action to remove should record the details on a near miss form. Forms should be handed to the site manager or a supervisor.
- Where a site manager or supervisor is able to take action to remove a hazard or unsafe condition, he/she will do so and update the near miss form, which will then be forwarded to the Managing Director. Where a site manager or supervisor is not able to take suitable action, the form will be sent to the Managing Director for action.
- The Managing Director will complete the remainder of the form when suitable action has been taken.
- When suitable actions have been taken and the hazard or unsafe condition removed, the completed form will be returned to the originator, with a copy being kept by the Managing Director.

3.4.7-NEAR MISS REPORTING PURPOSE

The purpose of this policy is to provide a method for reporting 'near miss' incidents. The investigation of such incidents can help to implement procedures or control measures which will prevent a recurrence of the incident and therefore prevent potential accidents.

Often the difference between a near miss and an accident resulting in injury is minimal a slight difference in timing, location or personnel.

DEFINITIONS

A 'near miss' is an unplanned event that did not result in injury, illness, damage or product loss - but had the potential to do so.

An 'accident' is an unplanned uncontrolled event that has lead to injury, illness, damage or some other loss to the company.

RESPONSIBILITIES

All staff must report 'near miss' incidents as soon as practical following the incident.

The near miss report form available from the site office should be used to report the incident. As much detail as possible should be provided to ensure a thorough investigation can be carried out. When complete the form must be returned to the office.

Where we are the Principal Contractor the Site Manager will collate the forms and carry out any required investigations.

For all other “Near Miss” incidents the Contracts Manager will collate the forms and carry out any required investigations.

RECORDS

Completed forms will be retained in the office for a period of three years

3.5.0-EMERGENCY PREPAREDNESS AND RESPONSE

3.5.1-FIRST AID–SITE OPERATIONS

A standard first aid box of a size appropriate for the numbers on site will be provided at the start of each project. If the site is of a special nature, additional items will be provided as required.

It is **MDN UK LTD** policy to have a trained first aider on all sites. In general, this will be the site manager. Notices will be posted indicating the location of the first aid box and the names of the trained first aiders.

The Health and Safety (First-Aid) Regulations 1981 require you to provide adequate and appropriate first-aid equipment, facilities and people so your employees can be given immediate help if they are injured or taken ill at work.

What is ‘adequate and appropriate’ will depend on the circumstances in your workplace and you should assess what your first-aid needs are.

The minimum first-aid provision on any work site is:

- a suitably stocked first-aid kit
- an appointed person to take charge of first-aid arrangements
- information for employees about first-aid arrangements

See **INDG214** and **L74 First Aid at Work** for further guidance

TABLE OF SUGGESTED NUMBERS OF FIRST AID TRAINED PERSONS

Category of risk	No. Employed	Suggested No. of first aid personnel
Lower risk e.g. shops, offices, libraries	Fewer than 25	At least one appointed person
	25-50	At least one first aider trained in EFAW
	More than 50	At least one first aider trained in FAW for every 100 employed (or part thereof)
Higher risk e.g. light engineering and assembly work, food processing, warehousing, extensive work with dangerous machinery or sharp instruments, construction, chemical manufacture	Fewer than 5	At least one appointed person
	5-50	At least one first aider trained EFAW or FAW depending on the type of injuries that might occur.
	More than 50	At least one first aider trained in FAW for every 50 employed (or part thereof)

3.6.0-FIRE PRECAUTIONS AND EMERGENCY PROCEDURES

3.6.1-SITE OPERATIONS

All potential fire hazards will be identified in the initial fire risk assessment and steps will be taken to remove the hazards from site or to minimise the risks. **MDN UK LTD** will develop a site fire safety plan that will detail how the risk of fire will be managed for each project. This plan will be reviewed and updated as the project develops. Fire detection and fire fighting equipment shall be made available as early in the project as is reasonably practicable and shall be suitable and sufficient for the nature and complexity of the project. As part of the site control measures the **MDN UK LTD** Hot Work Permit shall be used. This shall be issued by the Site Manager before any hot work is permitted on site. Hot works are defined as any work which creates heat, sparks or flames such as cutting, grinding, welding, soldering or brazing. It also includes use of hot air guns whereby the surface temperature of the material being heated may combust.

If sub-contractors have to carry out work which increases the risk of fire, then fire extinguishers may be required local to the work area.

The sub-contractor doing the work should ensure all loose flammable materials is moved away from the area and have their own suitable fire extinguisher close-by and available for immediate use should the need arise.

3.6.2-EMERGENCY PROCEDURES

As Principal Contractor **MDN UK LTD** will produce emergency procedures for the project and these will be detailed in the Construction Phase Plan. All employees and contractors will be advised of these procedures via the site induction. If **MDN UK LTD** is working as a contractor on a site under the control of a Principal Contractor, then **MDN UK LTD**, and their subcontractors, will follow the emergency procedures laid down by the Principal Contractor for that project.

Fire plan

Where a building is erected or extended, or has undergone a material change of use, Regulation 38 of the Building Regulations requires that a package of fire safety information must be assembled and given to the responsible person of the premises.

Fire risk assessment

Construction Design and Management (CDM) Regulations: In many countries, including the UK, these regulations apply to construction projects and require a fire risk assessment to be carried out during the design and planning phase.

3.6.3-OFFICES

The Managing Director will ensure that the appropriate number of fire extinguishers together with a fire alarm system is provided. Notices will be posted stating the evacuation procedures together with names of the fire wardens for the various sections of the buildings. Appropriate fire drills and alarm tests will be carried out and the results recorded.

3.6.4-SITE ACCOMMODATION

The site accommodation will be provided with adequate fire extinguishers. These will be positioned inside the accommodation and should only be used in an emergency. Where site accommodation is within the building or within 6m of a building then fire detection equipment shall be installed.

3.6.5 -MAINTENANCE OF FIRE EQUIPMENT

The Managing Director will ensure appropriate maintenance contracts are in place for the maintenance, testing and inspection for the various fire systems and fire extinguishers. They will also ensure fire/evacuation drills are carried out and any necessary records updated.

3.7.0-MONITORING AND REVIEW

3.7.1-PROCEDURE DURING AND FOLLOWING A HEALTH AND SAFETY ADVISOR INSPECTION

- The Health and Safety Advisor will ensure routine inspections of the site are made to monitor working practices and report on his findings. They will also advise the site manager and operatives of any health and safety issues as they arise. As part of the site inspection consideration shall be given to works that are to take place in the coming 4 weeks and to highlight to the site manager and Contracts Manager any information or actions relating to those works.
- On completion of the visits, a report will be written there findings. These will be discussed with the Site Manager who will sign, acknowledging receipt of the report.
- The Health and Safety Advisor shall note in the action column on the report what is required with a date by when the action should be completed. As the Site Manager actions the items raised, they should indicate this in the action column with his initials and the date action was taken.
- The Health and Safety Advisor will also send the Contracts Manager a copy of the report for their information with a copy also issued to the Managing Director so that they can monitor the Site Manager's actions.
- If on a subsequent visit the Safety Adviser is of the opinion that adequate action has not been, and will not be taken, he must inform the Managing Director.
- If the Safety Adviser is of the opinion that an operation constitutes a risk of serious injury to any person then he will take whatever action he feels necessary. If the Site Manager disagrees with this action the activity is to cease and the Managing Director is to be informed immediately. The Managing Director will then resolve the issue.

3.7.2-HEALTH SURVEILLANCE

Health Surveillance may be required for harm caused by working with certain substances or process. The Management of Health and Safety at Work Regulations 1999, The Control of Substances Hazardous to Health Regulations 2002, The Control of Lead at Work Regulations 2002, The Control of Asbestos Regulations 2012, The Control of Noise at Work Regulations 2005, The Control of

Vibration at Work Regulations 2005 and The Health and Safety (Display Screen Equipment) Regulations 1992, with their approved Code of Practice aim to protect people at work exposed to danger by controlling that exposure.

Reference should also be made to the following Health and Safety Executive (HSE) publications:

- HS(G)61-Health Surveillance at Work
- MS24-Health Surveillance of Occupational Skin Disease

MDN UK LTD will always seek to eliminate or reduce the risks to health from noise, hazardous substances and vibration and will give consideration to health surveillance as a method of risk control when necessary.

In the event of Health Surveillance being required, the following procedures and who can carry them out will be applied:

- Self-Checks: those exposed to hazards are properly trained in how to look for easily recognisable signs and symptoms of disease
- A responsible person making basic checks for signs of disease: Anyone trained to identify straightforward signs and symptoms caused by working with certain substances or process
- Enquires about symptoms, inspection and examination: Usually an Occupational Health Nurse
- Clinical Examinations: carried out or supervised by a doctor
- Biological Monitoring and Biological Effect Monitoring: carried out or supervised by a doctor

3.7.3-MONITORING OF SAFETY PERFORMANCE

The Managing Director, Contracts Managers, site managers and the Health and Safety Advisors have specific responsibility to monitor the implementation of the **MDN UK LTD** health and safety policy and to review the company's performance. Items to review include:

- Review of any significant accidents or incidents and identify if a procedural change is required.
- Review of any comments from the Health and Safety Executive (HSE), clients or other parties.
- Review of last period's safety objectives and determine if they have been achieved.
- Review any new legislation, guidance notes, or HSE initiatives.
- Review the Safety Management System, working procedures and training requirements, as appropriate.
- Set safety objectives for next period.

3.8.0-COMMUNICATION AND CONSULTATION

3.8.1-CONSULTATION

MDN UK LTD has a pro-active approach to health and safety and recognises the benefits of employees having a significant input into the **MDN UK LTD** health and safety procedures. They also play a vital role in providing feedback on actual performance, and identifying hazards that may have previously been missed. **MDN UK LTD** will consult employees in good time on health and safety matters, and in particular:

- When introducing measures which may affect health and safety
- The appointment of competent persons
- The provision of health and safety training
- The health and safety consequences of new technologies
- On site all employees (and subcontractors) will receive a site induction. On major sites this will be undertaken by the site manager.

The induction will cover:

- Site rules and PPE
- Welfare facilities
- First aid arrangements and emergency procedures
- The significant risks identified in the safety plan
- Relevant method statements
- Details of the arrangements for consultation

Throughout the project, all employees and contractors will be encouraged to continually liaise with the site manager to assist in the identification of any health and safety hazards that have not previously been identified.

3.8.2-CONSULTATION WITH NEW EMPLOYEES

The following procedures will be carried out for new employees:

- Explain to the new employee what he/she will be required to do and whom he/she is responsible to.
- Explain where the **MDN UK LTD** Health and Safety Policy is kept and explain its purpose and ensure the employee is aware of his/her responsibility.
- Ascertain if the employee has any disability or illness, which would affect their duties.

- Advise the employee of any hazards applicable to their works and duties and make them aware of the relevant risk assessments.
- Ascertain any training needs.
- Issue the employee with protective clothing as required.
- Inform the employee of the location of first aid equipment on site and advise him/her of the first aider.

Any sub contractor wishing to bring an employee under the age of 18 on to site must first discuss this with **MDN UK LTD** and produce a Young Person's Risk Assessment detailing how they will be kept healthy and safe on site, the limitations placed on their activities and how they will be adequately supervised.

3.8.3-CONSULTATION WITH SUBCONTRACTORS

Under the Construction (Design and Management) Regulations 2015, subcontractors have to be competent and **MDN UK LTD** require all site personnel to hold a valid CSCS card. In addition **MDN UK LTD** has to provide details of the significant risks that they will encounter on site. This will be achieved via the project health and safety plan.

When subcontractors are submitting their proposals to **MDN UK LTD** they will be asked to provide information about any significant risk their work will produce. These will be subject to an acceptable method statement and, if required an amendment or addition to the project safety plan.

In this way there is an exchange of information before the subcontractor begins work. This flow of information and joint consultation must continue throughout the project. On large multi contractor projects this may require a formal safety meeting with minutes etc. If on a particular project there are only one or two subcontractors working under the control of **MDN UK LTD** there is generally no need for a formal safety meeting but the site manager should still discuss health and safety matters with the subcontractors and given them an opportunity to comment on the way the site is being run. Regular meeting with the subcontractors supervisors should be held to discuss any health and safety news/updates which may affect works.

3.9.0-CONTRACTORS AND VISITORS

3.9.1-SITE TRAFFIC MANAGEMENT

When establishing a new site consideration will be given to the arrangements for deliveries of materials and collection of skips etc. with the intention of reducing risk associated with vehicle movements particularly reversing vehicles.

Where assistance is to be provided by us in vehicle movements the operative(s) shall wear high visibility clothing that must be clean. A risk assessment shall be completed for each site where deliveries/collections are to be made from the road and there is a risk from moving vehicles.

The principle contractor will establish a site traffic management plan indicating safe routes, vehicle routes and fire muster points. Refer to HSG 144 for further information regarding vehicle and pedestrian segregation.

3.9.2-WORK IN OCCUPIED PREMISES

Work in occupied premises will be carried out in accordance with the appropriate statutory provisions, taking into account the safety of the occupants, who may not be aware of the hazards from the work being undertaken, in particular;

- Noise
- Dust
- Nail guns
- Lighting
- Use of portable electrical equipment
- Health hazards
- Alterations to fire exit routes
- Use of access equipment
- General housekeeping

Channels of communication will be set up with building occupiers and where practicable access to working areas prevented.

3.9.3-VISITORS

- Visitors must make prior arrangements with the site manager/supervisor before attending the site and discuss requirements of a site induction to make them aware of emergency procedures, traffic management or any safety issues that may arise that day
- All visitors to visit the site manager/supervisor at arrival and keep to the safe pedestrian access routes while on site

- Visitors must sign in upon arrival and sign out when leaving
- Visitors on site must be escorted and wear the mandatory PPE (hardhat, safety boots, high visibility vest) an additional PPE required in some areas i.e. hearing protection, safety goggles or gloves as required.
- Visitors must not interfere with any works on site

3.9.4-DRIVING COMPANY VEHICLES

To ensure the safety of drivers of company vehicles and others that could be affected by the use of vehicles we will operate the following procedures:

- The Managing Director is responsible for ensuring that all company vehicles are suitable for their intended purpose. All company vehicles will be serviced according to manufacturers' recommendations and service log books will be maintained.
- The Managing Director will ensure that, where required, vehicles hold a current MOT test certificate and are presented for testing as legally required.
- The driver is responsible for ensuring that a weekly vehicle check sheet is completed for each vehicle under their control.
- The Managing Director is responsible for ensuring that company vehicles are driven only by persons holding a current, full licence for the type of vehicle and who have been authorised to do so.
- Before being allowed to drive a company vehicle, an employee will be required to present his/her driving licence for inspection. Thereafter, driving licences will be inspected annually.
- We do not expect employees to take risks when driving. Journeys should be planned in advance, allowing sufficient time to drive within speed limits and according to traffic conditions.
- Some prescription drugs and medicines carry a warning to persons taking them that they should not operate machinery or drive vehicles. Any driver prescribed such medication must inform the company immediately and must not drive until they have stopped taking the medication.
- Drivers are instructed to obey the Highway Code at all times Drivers are instructed NOT to use a mobile phone while driving, unless it is hands-free.
- The employee is responsible for paying any fines for driving or parking offences committed while he/she is in charge of a company vehicle.
- Any driver of a company vehicle must inform the company about any prosecution for a driving offence.
- Drivers are advised that on the morning following a night of heavy drinking their blood alcohol level may be above the legal limit. If a driver thinks that this is the case, he/she must not drive until they consider that their blood alcohol level is within the limit.
- Driving a company vehicle without authorisation or whilst under the influence of alcohol or illegal drugs are serious breaches of our health and safety rules. They will be considered as gross misconduct, which could lead to summary dismissal.

3.9.5-CIVIL CLAIMS

We acknowledge that employees and others (contractors, visitors and members of the public) who may be affected by our activities have the right to make claims for compensation, where they consider that an injury is the result of negligence on our part. Such claims will be dealt with on our behalf by our Employers' and Public Liability insurer.

- All incidents must be recorded, investigated and, where necessary, under RIDDOR, reported to the enforcing authorities as described in the Incident Reporting Procedure contained in this Policy
- Any person receiving a letter from a solicitor must forward this immediately to the Managing Director
- The Managing Director will, unless he instructs someone else to act on his behalf, forward the solicitor's letter to our insurer along with any evidence in our defence
- Direct correspondence with the claimant and/or his/her solicitor is strictly forbidden, as this may prejudice our defence
- All correspondence relating to the claim must be forwarded to the Managing Director immediately following receipt

It is our responsibility to provide evidence in defence. Therefore the Managing Director is responsible for collating a file of evidence for all reportable injuries and incidents and any other accidents where a claim is foreseeable. We may take a commercial view on minor accidents, balancing the possibility of a claim being brought against the cost of accident investigation.

- Evidence may take the form of the following documents, but this is not an exhaustive list:
- Entry in the Accident Book
- Statements from the injured person(s), witnesses, supervisors and first aider. These should be signed and dated and contain only statements of fact not supposition
- Copy of the accident/incident investigation report, with any photographs and diagrams
- Pre and post-accident risk assessments
- A copy of any written safety instructions given to the injured person(s)
- A record of any personal protective equipment issued to the injured person(s)

- Copies of any test certificates and/or records of maintenance and inspection of any equipment involved in the incident
- Any disciplinary evidence relating to the occurrence
- Copy of any statutory reporting document forwarded to the Enforcing Authority
- Copy of any correspondence from the enforcing authority relating to the incident

No evidence may be sent to our insurers without the permission of the Managing Director. A claim may be brought by an employee whether or not the accident has been recorded in the Accident Book or whether he/she has taken time off work as a result.

3.10.0-PERSONAL PROTECTIVE EQUIPMENT (PPE)

3.10.1-PERSONAL PROTECTIVE EQUIPMENT (PPE)

The Personal Protective Equipment at Work (PPE) Regulations 1992 and The Personal Protective Equipment at Work (Amendment) Regulations 2022 have specific requirements for the provision, maintenance and use of protective clothing and equipment.

Other Regulations may also apply and reference PPE usage such as The Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended) and are referred to in other sections of this Policy. All safety equipment purchased for use on Company sites will be in accordance with the appropriate national standards.

Information on provision, maintenance and use of protective clothing or equipment, in accordance with the Regulations, Health and Safety Executive (HSE) recommendations and current good working practices, is available from Safety Minded Solutions.

A standard issue of suitable PPE will be provided to all employees where the need is identified through risk assessment. Any reduction in the standard of PPE required on site must be supported by a risk assessment completed by the site manager and reviewed on a weekly basis.

Additional items of personal protective equipment will be provided for those employees who may have to work in inclement weather and hazardous situations where the risk cannot be reduced by other means.

All employees must use and wear the personal protective equipment that has been provided in order to fulfil their legal responsibilities and they are required to take reasonable care of it. Facilities for the storage of PPE will be made available within cabins provided at our sites/projects. If PPE becomes damaged, worn out or lost this should be reported to the Site Manager/Site Foreman so that replacement PPE can be provided. The Supervisor will ensure that employees have been provided with any necessary protective clothing.

Any limb worker/employee or sub-contractor working under the Company's control observed carrying out any process which requires the use of protective clothing, or equipment, will be informed of statutory or Company Policy requirements and instructed not to continue working until protective clothing, or equipment is obtained.

Those persons issuing protective clothing, or equipment, will ensure that it is suitable for the specific process for which it is provided and update the company PPE issue register. All persons issued with protective clothing, or equipment, must immediately report to their supervisor any loss or defect in the equipment.

All supervisory and management employees will set a good example by wearing safety helmets, protective footwear, etc. and will use all protective clothing and equipment where required.

All Personal Protective Equipment shall be:

- Properly stored in a well-defined place
- Checked at suitable intervals
- Repaired or replaced if found to be defective
- If contaminated, removed on leaving the work area and kept apart from uncontaminated clothing and equipment
- Equipment that is contaminated must be either decontaminated and cleaned or, if necessary, destroyed.

Head protection

The Personal Protective Equipment at Work (PPE) Regulations 1992 requires the provision and use of head protection on sites where there is a risk of injury. Employers must provide safety helmets where a risk of head injury other than by falling exists. Issue instructions on the wearing of helmets

and take action if helmets are not worn as required. Personnel issued with safety helmets must wear the helmets as instructed by employer.

All work will be negotiated in accordance with the above standards.
The Project/Contracts Manager will ensure that Site Managers and Sub - Contractors are aware of Company Policy and the requirements of The Personal Protective Equipment at Work (PPE) Regulations 1992 of the wearing of safety helmets before the commencement of each new site. Helmets will be provided to each site for the use of visitors to the site.

Signs warning that safety helmets to be worn will be displayed at access points to working areas. Instruction on the provision and use of helmets will be included in training courses provided for staff. The Site Manager will ensure that signs and helmets for visitors are available, and that Sub-Contractors are aware of Company Policy/site rules. The Site Manager will ensure that all those attending/visiting sites wear a safety helmet as required by risk assessment and site rules.

The Project/Contracts Manager will ensure that it is a condition of the Subcontract Agreement that all contractors will provide safety helmets to all their employees and that they are instructed in the requirements of this Company Policy.

The Site Manager will report any disregard of this policy by Sub-Contractors' employees to the contractor concerned. The contractor will be obliged to remove from site any employee who continually fails to comply with this requirement.

Safety helmets that are damaged, have received a heavy blow, have parts missing, have been weakened by drilling holes or painting must be replaced. The generally recommended lifespan for most safety helmets is three years. Certain helmets have an indefinite life span and need not be replaced in this period. Safety helmets will be worn by all staff, Sub-Contractors, employees, visitors as per risk assessment findings.

However, helmets need not be worn in the following areas if construction operations are not taking place in the following areas:

- Site office and welfare facilities
- Sales area
- Areas where houses are occupied
- Inside buildings after second fix complete

All persons working in such "exempt areas" will however, be required to always have their safety helmets with them so that they can wear them immediately they exit such areas. Safety helmets will be worn by all employees, subcontractors, and visitors as per risk assessment findings.

3.11.0-CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

3.11.1-CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH

Regulations that cover the control and the safe use of all materials, chemicals and substances, are covered by The Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended)

No assessment should be carried out without reference to:

EH40 Occupational Exposure Limits

All work will be planned to take the above standards into account.

The Company will provide written COSHH assessments for all those products and substances that have been assessed as hazardous to health.

Before work starts, the Contracts Manager will ensure that any special protective clothing, or equipment, required is available for use on site.

The Site Manager will ensure that, before operatives are set to work, they are instructed in the safe use of any product they are using in accordance with the written assessment. He will take into account the circumstances and conditions in which the substance is being used when instructing the workforce. He will ensure that any necessary protective clothing or equipment is provided and used.

Managing hazardous substances, and complying with The Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended), requires the Company to take the following steps to comply with the Regulations:

Identify the problem.

Assess it, measure it, get some idea of the scale.

Consider:

- The hazardous properties of the substance
- Health affects as identified by the supplier
- The level, type and duration of the exposure
- The circumstances of the work and amount of substance involved
- Limits on exposure from statutory guidance

Decide on the method of solving the problem, preferably by minimising exposure but considering:

- The effect of preventative and control measures
- The results of any health surveillance
- The results of monitoring the exposure
- Any other information relevant
- Implement the chosen method of solving the problem
- Check that the method is being implemented properly and monitor the outcome
- If necessary develop procedures, provide information and establish warning systems to deal with emergencies involving hazardous substances
- Waste routes for disposal of packaging and contaminated clothing/equipment

Marking of containers

In addition, any containers or pipes for substances hazardous to health used at work should be clearly marked with the nature of the contents and any associated hazards.

Staff will be made aware of the hazards of any materials they will be asked to use, hazard data sheets will be issued for each product and control methods will be devised.

3.11.2-DUST CONTROL

All work which creates dust must be adequately assessed and dust control must be in place.

The following Regulations have specific requirements for the provision, maintenance and use of tight fitting respiratory protective equipment:

- The Personal Protective Equipment at Work (PPE) Regulations 1992
- The Control of Asbestos Regulations 2012
- The Control of Lead at Work Regulations 2002
- The Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended)
- EH44 Dust: general principles of protection
- CIS 36 Construction Dust
- INDG463 Control of exposure to silica dust

All work will be planned to take the above standards into account. Where respiratory protective equipment (RPE) is used as a control measure it is vital that selected RPE is adequate and suitable.

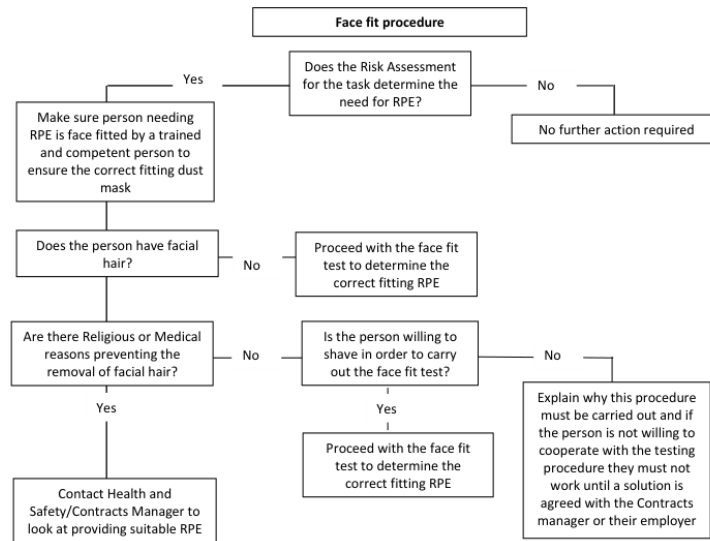
To ensure that the selected RPE has the potential to provide adequate protection for individual wearers, the ACoPs supporting COSHH, CAR and CLAW stipulate that tight fitting RPE must be fit tested as part of the selection process to help ensure that inadequately fitting face masks are not selected for use that create leakages of airborne contaminants and afford the wearer little or no protection.

All persons who wears a tight fitting respirator must have a valid Face Fit Certificate. This certificate is product specific and means if the operator wears more than one type of mask he will need separate face fit tests

Face Fit Procedure

The following procedure must be followed where there is a possibility of dust exposure:

- Check - does the specific Risk Assessment for the task determine the need for RPE?
- If YES: make sure persons needing the RPE are Face Fitted by a trained and competent person and provided with the correct RPE.
- If the Person is NOT willing to remove any facial hair to undertake the Face Fit Test, then they cannot be allowed to work, and discussions should be held with the Contracts Manager.
- Under special circumstance, if an employee cannot be clean shaven for religious or medical reasons for example then other powered RPE will be looked at and provided by the company
- Failure to follow any of these procedures may lead to disciplinary action.



3.11.3-ASBESTOS

Asbestos is a generic term for a number of silicates of iron, magnesium, calcium, sodium and aluminium that appear naturally in fibrous form. In the 2012 Regulations, asbestos is defined as any of the following minerals, "crocidolite, amosite, chrysotile, anthophyllite, actinolite, tremolite or any mixture containing any of the said materials".

General obligations are covered by the Health and Safety at Work etc Act 1974. Specific legislation regarding asbestos is defined in the:

- The Control of Asbestos Regulations 2012
- Reference should also be made to the following Health and Safety Executive (HSE) publications:
- L143 (2nd)-Managing & Working with Asbestos (second edition)

Duty holders have an explicit duty to assess and manage the risks from asbestos in premises in compliance with Regulation 4 of The Control of Asbestos Regulations 2012. Each premises assessment will be used to produce a Management Plan which details and records the actions to be undertaken to manage and reduce the risks from asbestos and have a requirement to pass on information about the location and condition of Asbestos Containing Materials in non-domestic premises, to anyone likely to disturb them.

All employers also have a duty to ensure all employees who may encounter asbestos are provided with adequate training as laid down within the legislation. This training will ensure that they understand the action to be taken on discovering asbestos (or suspected asbestos containing materials) so that they do not place themselves or anyone else at risk.

All work will be planned to take the above standards into account.

Under the 2012 Regulations duty holders must undertake an assessment of their premises to establish the likely presence of asbestos. Reference should be made to asbestos registers when planning work on existing premises.

The Company will seek confirmation of the existence or otherwise of asbestos on site. Should asbestos be known to exist, the Company will review and, if necessary, amend the method statement and risk assessments as appropriate.

All operatives will be informed that asbestos exists on site and will be given specific instructions by the Site Manager/Supervisor as to how it affects them in their working practices. Recognised control procedures will be employed and operatives will report defects or non-compliance in the procedures to the Site Manager/Supervisor immediately.

All operatives will be given training, advice and guidance on the likely form that asbestos containing materials may take on the project, and how to recognise suspect material.

The Site Manager/Supervisor will control all other operatives because of the actions and advice of the specialist contractor.

Where operatives are likely to be exposed to asbestos at or above the control limits, and exposures cannot reliably be estimated, the company is obliged to keep monitoring records for a period of at least five years, and for at least 40 years if the Action Level is also likely to be exceeded. Operative exposed to asbestos at or above the Action Level must undergo medical surveillance.

No operative will be allowed to work in areas identified by the specialist contractors as being affected by asbestos.

The Site Manager/Supervisor will designate "No Go Areas". Only employees of a specialist contractor, or persons authorised by that contractor will be allowed access to the designated areas.

If the presence of asbestos is unexpectedly "discovered" during normal working activity, the Site Manager/Supervisor must be informed immediately and the procedures outlined above will be put into effect. The Site Manager/Supervisor will stop work in all areas they feels may be affected until specialist help arrives. The Contracts Manager will also be immediately informed.

The spread of asbestos from one place to another must be prevented or reduced to the lowest levels possible.

Suitable and adequate washing and changing facilities will be provided on site for all persons exposed to asbestos.

These facilities will include somewhere to store protective clothing and equipment. Disposal of contaminated clothing and equipment that cannot be decontaminated must also be arranged.

All plant, machinery and protective equipment exposed to asbestos dust will be taken out of service (if not removed as asbestos waste) until it has been thoroughly cleaned before it will be used again.

Raw asbestos and asbestos waste must always be stored and transported in sealed properly labelled containers.

No employee/contractor will resume work in the contaminated area until a clean air certificate/certificate of reoccupation has been issued by the specialist licensed removal company.

Allowed activities

Almost all work with asbestos containing materials will require work to be done by licensed contractors/specialists, however there are some circumstances where this does not apply, which includes:

Work where exposure is sporadic and of low intensity

The risk assessment shows that the exposure of any employee to asbestos will not exceed the control limit (0.6cm³ [10 mins] or 0.1 f/cm³ [4 hrs])

The work involves:

- Short, non-continuous maintenance activities
- Removal of materials where the fibres are firmly held in a matrix
- Encapsulation or sealing of asbestos-containing materials which are in good condition
- Air monitoring and control, and collection and analysis of samples to ascertain whether a specific material contains asbestos.

A safe system of work must be planned and clearly explained to the employees involved.

3.11.4-LEGIONELLA

Legionella is a type of bacteria that can cause Legionnaires' disease, a severe form of pneumonia.

This procedure aims to minimize the risk of Legionella exposure by establishing clear guidelines for water system management, testing, and response protocols.

This procedure applies to all facilities owned or operated by **MDN UK LTD** where water systems are present, including but not limited to cooling towers, hot and cold-water systems, and decorative water features.

Management

- Ensure compliance with relevant legislation and standards, including the Health and Safety at Work Act and HSE guidelines on Legionella.
- Allocate resources for the implementation and maintenance of this procedure.
- Appoint a competent person or team responsible for Legionella management and testing.

Competent Person/Team

- Conduct risk assessments for all water systems to identify potential sources and conditions conducive to Legionella growth.
- Develop, implement, and review a Legionella control management plan.

- Schedule and perform regular testing for Legionella in accordance with industry best practices.
- Maintain accurate records of risk assessments, test results, maintenance activities, and corrective actions taken.

Employees

- Follow all procedures and instructions related to water system maintenance and Legionella management.
- Report any concerns regarding water quality or system maintenance to the competent person/team promptly.

Risk Assessment

- Conduct a comprehensive risk assessment at least annually and whenever there are significant changes to the water system or its use.
- Identify potential sources of Legionella, including stagnant water, dead legs, and temperature control issues.
- Evaluate the risk of exposure to employees and other stakeholders.

Control Measures

- Establish and maintain hot and cold-water systems that are designed to minimize the risk of Legionella proliferation.
- Implement temperature control measures:
- Store hot water at a minimum temperature of 60°C (140°F) and deliver it to outlets at a minimum of 50°C (122°F).
- Store cold water below 20°C (68°F).
- Flush water systems regularly to prevent stagnation.
- Ensure proper maintenance of cooling towers, evaporative condensers, and other water systems.
- Provide training for employees on Legionella awareness and control measures.

Testing Protocol

- Conduct routine testing for Legionella at predetermined intervals based on the risk assessment (e.g., quarterly, biannually).
- Engage accredited laboratories for water sample analysis.
- Document all testing results and review them against established action levels.

Response Plan

- If Legionella is detected above the acceptable level, take immediate action, including:
- Isolating the affected water system.
- Implementing corrective actions to eliminate the Legionella presence.
- Conducting a follow-up test to confirm eradication.
- Notifying relevant stakeholders and regulatory bodies as required.

Record Keeping

- Maintain records of risk assessments, testing schedules, results, corrective actions, and training sessions for a minimum of five years.
- Ensure records are easily accessible for review by management and regulatory authorities.

Review and Revision

- This procedure should be reviewed annually or following significant changes in legislation, best practices, or organizational structure.
- Update the procedure as necessary to reflect current best practices and compliance with legal requirements.

Conclusion

The prevention of Legionella growth is a critical aspect of our commitment to workplace safety and health. By following this procedure, **MDN UK LTD** aims to protect employees and visitors from the risks associated with Legionella.

3.12.0-CONTROL OF NOISE AND VIBRATION

3.12.1-NOISE

Noise is covered by The Control of Noise at Work Regulations 2005 and also by The Health and Safety at Work etc. Act 1974.

Reference should also be made to the Health and Safety Executive (HSE) publication; L108-Guidance on the Control of Noise at Work Regulations 2005

Generally hearing loss is gradual. By the time it is noticed, it is probably too late. However, the following are some signs to look out for:

- Conversation becomes difficult or impossible
- Your family complains about the television being too loud
- You have trouble using the telephone
- You find it difficult to catch sounds like 't', 'd' and 's', so you confuse similar words
- Permanent tinnitus (ringing, whistling, buzzing or humming in the ears) can also be caused

The aim is to prevent hearing loss before it happens.

The Control of Noise at Work Regulations 2005 came into force on 6 July 2006 and replaced the Control of Noise at Work Regulations 1989.

New exposure action values and exposure limit values have been set. The exposure action values are the levels of exposure to noise at which certain actions are required to be taken (regulations 5,6,7,9 and 10). The exposure limit values are the levels of noise above which an employee may not be exposed.

The lower exposure action values are:

- a daily or weekly personal noise exposure of 80 dB(A)
- a peak sound pressure of 135 dB(C)

The upper exposure action values are:

- a daily or weekly personal noise exposure of 85 dB(A)
- a peak sound pressure of 137 dB(C)

The exposure limit values are:

- a daily or weekly personal noise exposure of 87 dB(A)
- a peak sound pressure of 140 dB(C)

The use of a weekly personal noise exposure value may be used where exposure to noise varies markedly from day to day

The level at which employers must provide hearing protection and hearing protection zones is 85 dB(A) (daily or weekly average exposure) and the level at which employers must assess the risk to workers' health and provide them with information and training is 80 dB(A).

There is also an exposure limit value of 87 dB(A), taking account of any reduction in exposure provided by hearing protection, above which workers must not be exposed.

3.12.2 -VIBRATION

Vibration is covered by The Control of Vibration at Work Regulations 2005, further requirements can be found in Provision and Use of Work Equipment Regulations 1998, The Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and The Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013

The Importance of Addressing Vibration in the Workplace

Hand-Arm Vibration Syndrome (HAVS)

HAVS is a painful and debilitating condition that impacts the nerves, blood vessels, muscles, and joints of the hands and arms. Symptoms include tingling and numbness in the fingers, decreased grip strength, impaired sense of touch, and circulation issues such as vibration white finger (VWF).

Whole-Body Vibration (WBV)

WBV primarily contributes to low back pain. However, back discomfort can also stem from other factors like manual handling and poor posture. While exposure to vibration and shocks may exacerbate existing back issues or cause discomfort, they are not always the direct cause of back pain.

Excessive use of handheld or guided vibrating tools and equipment can have a serious and lasting effect on the body. In general vibration can cause severe pain and numbness in the fingers, the sensation of pins and needles, loss of sense of touch, loss of grip strength and painful wrists. The above sensations/pains are more noticeable in cold weather with the digits blanching hence the term Vibration White Finger.

Exposure limit values and action values

- (1) For hand-arm vibration -
 - (a) the daily exposure limit value is 5 m/s² A(8);
 - (b) the daily exposure action value is 2.5 m/s² A (8)

- (2) For whole body vibration -
(a) the daily exposure limit value is 1.15 m/s² A(8);
(b) the daily exposure action value is 0.5 m/s² A (8)

"Daily exposure" means the quantity of mechanical vibration to which a worker is exposed during a working day, normalised to an 8-hour reference period, which takes account of the magnitude and duration of the vibration.

The degree of damage is dependent upon:

- The vibration levels of the equipment being used
- The length of time of use
- How awkward it is to use
- How tightly it is necessary to grip the tool
- How cold and wet the operator gets when using the equipment

In conducting the risk assessment, the employer shall assess daily exposure to vibration by means of-

- (a) observation of specific working practices.
- (b) reference to relevant information on the probable magnitude of the vibration corresponding to the equipment used in the working conditions; and
- (c) if necessary, measurement of the magnitude of vibration to which their employees are liable to be exposed; and
- (d) the employer shall assess whether any employees are likely to be exposed to vibration at or above an exposure action value or above an exposure limit value.

The risk assessment shall include consideration of-

- (a) the magnitude, type, and duration of exposure, including any exposure to intermittent vibration or repeated shocks.
- (b) the effects of exposure to vibration on employees whose health is at particular risk from such exposure.
- (c) any effects of vibration on the workplace and work equipment, including the proper handling of controls, the reading of indicators, the stability of structures and the security of joints.
- (d) any information provided by the manufacturers of work equipment.
- (e) the availability of replacement equipment designed to reduce exposure to vibration.
- (f) any extension of exposure at the workplace to whole-body vibration beyond normal working hours, including exposure in rest facilities supervised by the employer.
- (g) specific working conditions such as low temperatures; and
- (h) appropriate information obtained from health surveillance including, where possible, published information.

Managers and Operators can reduce the likelihood of onset of Vibration Related Upper Limb Disorders by:

- Reducing the number of items of equipment that vibrates above the recommended safe level, 2.5 m/s² or the total daily dose of 5.0 m/s² (A8) (Average over an 8-hour day)
- Ensuring equipment is maintained in accordance with the manufacturer's instructions•
- Reducing the amount of trigger time, the operative uses the equipment for
- Use of suitable gloves
- Operator exercising the hands and fingers
- The operator being able to recognise the onset symptoms
- Job rotation

The company will ensure all work activities are planned to take the above standards into account.

The site manager must ensure that information on the vibration level of any plant or equipment, which it is intended to hire, or purchase is obtained and considered before hiring or purchase takes place. Manufacturer's data should be consulted for vibration data, other options include taking measurements using specialist equipment.

Where operatives are required to work in situations where high levels of vibration are likely to be encountered, the Site Manager will ensure that full information is provided, before work commences, on the levels and frequencies of any vibrating tools or equipment.

Any measures to reduce vibration levels to below levels considered to be safe must be planned or, if this course of action is not practicable, suitable vibration protection measures taken by Managers and Operatives.

Regular monitoring of vibration levels and frequencies will be planned, if required.

Instruction and training will be provided to relevant site managers and operatives as required to work with plant and equipment, which is likely to result in exposure to high vibration levels.

The site manager will ensure that all plant and equipment provided is properly serviced and maintained in accordance with the manufacturer's instructions; are kept in good order and that any defects noted are reported immediately.

- Carry out a written vibration assessment to establish levels and frequencies of vibration for individuals using items of plant and machinery
- Give advice on vibration control measures
- Follow the control hierarchy to reduce the likelihood of exposure, use ready reckoner to calculate exposure limits
- Plan to Regularly monitor vibration levels and frequencies for known high sources

Vibration Risk Assessment

Contract

Assessment Number

Operation:

Activity/ Tool	Vibration Magnitude (m/s ²)	Trigger Time (hr/min)	Exposure Points
Total Exposure points			

Assessment must include all vibration producing tools to be used during the working activity/day, the time spent actually using the tool (trigger time) must be accurately entered.

The risk from exposure increases with the level of vibration and the length of exposure, both within the working day and in the long term. To recognise this as an equivalent 8-hour "dose" of vibration A(8) is used.

Where the daily dose significantly exceeds the A(8) = 2.5 m/s² level (100 points) it must be demonstrated that:

- It was necessary to complete the work in this manner.
- All reasonable steps have been taken to reduce the risk of VWF.

Control measures to be implemented includes;

- Use alternative method that avoids or reduces vibration
- Select low vibration equipment
- Rotate job to reduce exposure times
- Encourage hand & finger exercise
- Toolbox Talks on avoiding risks

3.13.0-TOOLS AND EQUIPMENT

3.13.1-WORK EQUIPMENT

All **MDN UK LTD** plant will be inspected weekly by the site manager (or his delegated responsible person) and the results entered into the Site Plant Inspection Register. The site manager will be responsible for ensuring all plant is maintained and repaired where necessary. Hired equipment will be subject to the same controls. At no time will plant or equipment be borrowed or loaned out.

Subcontractors will be monitored by the Contracts Manager and Site Manager to ensure that they inspect and maintain their plant in a safe condition.

Evidence of appropriate operator training and plant inspection records shall be made available by the sub-contractor to **MDN UK LTD**.

MDN UK LTD is committed to maintaining a comprehensive documentation and categorization system for all products and systems utilized in our operations. This policy ensures that all stakeholders are informed about the necessary requirements and specifications for each item. Specifically, all tools and equipment used on-site will be documented under the 'Equipment' category, which encompasses a range of classifications based on their intended use and regulatory compliance. Furthermore, each piece of equipment must possess the appropriate UKCA Marking,

which serves as a crucial product specification indicating conformity with UK safety standards. This systematic approach not only enhances transparency and accountability but also ensures that all relevant parties have access to essential information regarding product compliance and safety requirements, thereby fostering a culture of safety and quality assurance within our organization. Regular reviews and updates to this documentation will be conducted to reflect any changes in regulations or operational needs.

3.13.2-PORTABLE ELECTRICAL EQUIPMENT

Portable Electrical Equipment

PAT testing must be carried out for all equipment within our offices or sites that is or may be connected via a plug and socket to a source of electricity, whether the company owns the equipment or not:

- Equipment should not be used if it does not display a current testing label. This is usually, but not always, displayed on the plug
- User checks must be carried out before use
- Equipment manufacturer's maintenance and usage instructions must be followed
- Battery powered or 110 voltage tools with power supplied through an isolating centre tapped to earth should be used if practicable
- An RCD or ELCB must be used with existing 240 volt equipment where there is no safer alternative. Such devices must be tested by operating the in-built test button every 3 months and inspected by a portable electrical tester every year as a minimum
- The supply voltage to portable electric tools must be within the operating range marked on the tool

PORTABLE ELECTRICAL APPLIANCES USED IN INSTALLATION AND MAINTENANCE WORK

For the purpose of this policy a portable or transportable electrical appliance is defined as any item powered electrically and supplied via a lead and plug.

Portable and transportable electrical appliances provided for use during site work will be battery operated or operate at 110 volts, supplied through a centre-tapped transformer

Where battery or 110-volt equipment is not available, 240 volts equipment will be used with a residual current device (RCD) operating at 30 mA/30mS

All persons using hand-held power tools are responsible for inspecting plugs and leads before use

Any person finding an item of damaged equipment should bring this to the attention of their Supervisor immediately

Portable and transportable electrical appliances owned by us will be tested by a competent person

Any person hiring a portable or transportable electrical appliance must obtain a current test certificate from the hire company

The use of personal electrical equipment, including radios or tape players, is not permitted

PORTABLE ELECTRICAL APPLIANCES USED ON OUR PREMISES

For the purpose of this procedure a portable electrical appliance is defined as any item powered electrically and supplied via an electrical lead and plug.

All persons using hand held electrical appliances are responsible for inspecting plugs and lead before use.

Any person finding an item of damaged equipment should bring this to the attention of the Managing Director or Site Manager immediately.

Portable electrical appliances will be inspected and tested (PAT Tested) at the appropriate frequency for the level of risk.

DAILY VISUAL INSPECTIONS

All users must look critically at the electrical equipment they use frequently, this needs to be daily in the case of hand held and hand operated appliances to check that the equipment is in sound condition (remember to unplug and switch off first).

Checks must be made for:

- Damage, e.g. cuts, abrasion (apart from light scuffing) to the cable covering.
- Damage to plug, e.g. the casing is cracked or the pins are bent
- Non-standard joints including taped joints in the cable
- The outer covering (sheath) of the cable not being gripped where it enters the plug or the equipment. (Look to see if the coloured insulation of the internal wires is showing)
- Equipment that has been used in conditions where it is not suitable, e.g. a wet or dusty workplace
- Damage to the outer cover of the equipment or obvious loose parts or screws
- Signs of overheating (burn marks or staining)

The checks also apply to extension leads, associated plugs and sockets. Any faults must be reported to the Contracts Manager and the equipment taken out of use immediately and labelled as faulty (and why). It must not be used again until repaired.

Note: Equipment which exhibits intermittent faults e.g. working infrequently must be taken out of service and not used again until thoroughly checked out by a competent person and the source of the fault identified and rectified.

TESTING OF PORTABLE ELECTRICAL EQUIPMENT

Electrical testing of portable electrical equipment for earth/insulation integrity using a portable appliance tester will be carried out by a competent person in addition to the user visual inspections:

- Whenever there is a reason to suppose the equipment may be defective, (but this cannot be confirmed by visual inspection)
- After any repair, modification or similar work
- At regular intervals in accordance with current regulations / best practice

Combined inspection and testing should be carried out by someone with a wider degree of competence than that required for visual inspection alone. This is because the results of the tests may require interpretation and appropriate electrical knowledge.

FREQUENCY OF INSPECTION

Recommendations for initial frequency for inspection/testing are published by the Health and Safety Executive. This frequency can be shortened or lengthened in the light of practical experience i.e. number of faults which appear. As a minimum, testing should be carried out annually for equipment with light use.

In high risk environments such as construction sites portable electrical equipment should have formal visual checks every 3 months with combined inspection and electrical tests every 6-12 months

3.13.3-COMPRESSED AIR TOOLS

The following regulations apply to the use of compressed air equipment on site:

- Provision and Use of Work Equipment Regulations
- The Manual Handling Operations Regulations
- The Management of Health and Safety at Work Regulations
- The Construction (Design and Management) Regulations
- The Personal Protective Equipment at Work Regulations
- The Control of Vibration at Work Regulations

Health and Safety Executive Guidance Note PM 17, Pneumatic Nailing and Stapling Tools, give advice on precautions required with this equipment.

- All work will be planned to take the above standards into account.
- The Contracts Manager will ensure that any compressor and compressed air tools, which are purchased or hired for use on site, are in accordance with the above standards and are selected in accordance with the company policy on noise.
- The Works Supervisor will ensure that any compressor or compressed air tools provided for use are fitted with all necessary guards and safety devices, (jockey wheel, brake, engine cover stays, etc) and noise control measures; and that instructions have been given to operatives in the correct use of the equipment to reduce noise, injuries, damage, etc.
- The Works Supervisor will ensure that all necessary safety equipment, e.g. eye protection, hearing protection, is available and provided and used as required.
- The Works Supervisor will ensure that any defects in the compressor, hoses or tools are reported immediately to the Contracts Manager or hire company.
- The Works Supervisor will ensure that all operatives wear suitable protective footwear when using compressed air equipment, breakers, rammers etc.
- Compressed air will not be used to blow down clothing etc.
- When moving compressors care must be taken to ensure that the jockey wheel, or towing arm stand, are not damaged.
- When changing tools connected to compressed air lines not fitted with automatic cut off valves, air must be turned off at source (lines must not just be folded and held or tied).

3.13.4-ABRASIVE WHEELS

Only personnel trained in the mounting of abrasive wheel shall mount the wheels.

Abrasive wheels/appliances to only be used by competent persons

Adequate eye protection and dust control to be used

Risk assessment to be available prior to works with abrasive wheels

3.13.5-KNIVES

The Safe Use of Knives procedure is designed to ensure the safety and well-being of all individuals who handle knives within the organization or facility by minimizing injury risks and promoting responsible handling. This procedure applies to all employees, students, and visitors. All users must receive proper training on knife safety, including understanding different types of knives, their uses, and safe handling practices. Use of knives should be supervised by a trained adult or supervisor, and appropriate Personal Protective Equipment (PPE), such as cut-resistant gloves and non-slip footwear, must be worn. Proper handling techniques include cutting away from the body, keeping fingers clear of the cutting path, using a stable and non-slip surface like a cutting board, ensuring knives are sharp to prevent slips, and holding the knife securely with the correct grip. Knives should be stored safely in designated knife blocks, sheaths, or magnetic strips when not in use, and regularly inspected for

damage or wear, with maintenance performed only by trained personnel. In case of an injury, it is essential to stop using the knife, assess the situation, clean minor cuts, and seek medical help for serious injuries, reporting the incident to a supervisor. Prohibited practices include horseplay, distractions, leaving knives unattended, and using knives for inappropriate tasks such as prying or opening cans. Individuals are responsible for following this policy and must report any unsafe conditions immediately; violations may result in disciplinary actions, including retraining or loss of knife privileges.

3.14.0-MANUAL HANDLING OPERATIONS

3.14.1-MANUAL HANDLING

Manual handling is the transporting or supporting of an animate or inanimate load, including lifting, lowering, pushing, pulling, holding, carrying, throwing and moving by the application of bodily force to that load.

Company Responsibilities:

- Identify whether formal manual handling assessment is required.
- Ensure that manual handling risk assessments have been undertaken where required.
- Implement manual handling control measures where appropriate.
- Ensure that affected employees are suitably trained and informed.
- Employees complete e-learning on line training in Manual Handling.

Employee Responsibilities:

- Follow all systems of work laid down for their safety.
- Avoiding the need for hazardous manual handling operations.
- Assessing the risk of injury from manual handling.
- Reducing the risk from manual handling as far as is reasonably practicable.
- Make full and proper use of equipment provided for their safety.
- Report any defects in systems, practices or equipment.
- Attend training when required to do so.
- Take reasonable care of their own health and safety and that of others.
- Inform their manager when they believe that there is a risk of injury

TILE

The TILE acronym in manual handling stands for Task, Individual, Load, and Environment, and it is used to assess the risks involved in manual handling tasks

T – Task:

Assess the task before lifting or moving. Is it necessary? Can it be done differently? Consider the weight, shape, and stability of the object.

I – Individual:

Evaluate the individual's capabilities. Are they physically able to perform the task safely? Do they need assistance or equipment? Consider their strength, experience, and health.

L – Load:

Examine the load's characteristics. Is it heavy, awkward, or unstable? Check its size, shape, weight, and whether it can be secured or divided into smaller parts.

E – Environment:

Look at the environment where the handling will occur. Is there enough space? Are there obstacles, slippery surfaces, or uneven ground? Ensure the area is safe and suitable.

Using TILE involves:

- Assess the task to determine if manual handling is necessary and safe.
- Evaluate the individual's ability to perform the task safely.
- Examine the load for potential hazards.
- Check the environment for safety concerns.

3.15.0-WORKING AT HEIGHT

3.15.1-WORKING FROM HEIGHT

The Work at Height Regulations 2005 applies to all work at height activities.

The Workplace (Health, Safety and Welfare) Regulations 1992, in particular Regulations 13 – 16 may apply in part or completely

Reference should also be made to the following Health and Safety Executive (HSE) publications:

INDG401-Working at height a brief guide
L24-Workplace Health Safety and Welfare

Work at height means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury. For example, you are working at height if you: are working on a ladder or a flat roof; could fall through a fragile surface; could fall from a vehicle flatbed; could fall into an opening in a floor or a hole in the ground.

All work will be planned to take the above standards into account.

The Manager will plan the following arrangements as appropriate:

- To avoid or minimise Work at Height as far as reasonably possible
- Suitable means to prevent falling using guard-rails, barriers, working platforms etc.
- Protection for the public, or other operatives who may be at risk.
- Safe means of access to the workplace.
- Where necessary, suitable access equipment.
- Protection of fragile surfaces.

Where falls cannot practically be prevented then a system of fall protection must be used. There are two basic types:

- Those that provide a collective safeguard e.g. safety nets, air bags or bean bags
- Those that provide personal fall protection e.g. safety harnesses attached to a suitable anchorage point

Both systems require appropriate training and supervision to ensure their effectiveness.

Collective safeguards have the advantage over personal fall protection in that they do not rely on supervision to ensure their effectiveness and they may also allow work to be carried out below with less danger from falling objects.

If a personal protection system is used, then a rescue procedure must be planned, communicated to the workforce and implemented prior to work commencing.

Short duration work will also be carefully planned to identify hazards and arrange for the provision and securing of access equipment as necessary.

Training will be provided for supervisors and operatives required to work at height.

The Manager will not permit work to commence at height until the planned safety precautions have been provided. Work at height must not be permitted if safety could be affected by high winds or gusty conditions.

Consideration must be made of conditions that could affect safety, such as extremes of temperature, wet weather or icy conditions.

Materials must not be dropped or thrown down from heights, other than by means of a chute, or suitable safe method.

The main hazards associated with work at height are:

- Falls from unprotected edges.
- Falls through incomplete or fragile surfaces.
- Objects falling from heights.
- Contact with overhead electric cables (see separate section).
- Falls from ladders.

All personnel required to work near or below any work at height must wear safety helmets.

Access to the workplaces at height must be prevented to unauthorised persons, particularly children, after working hours.

All work at height, no matter how small, should consider the above standards when work is planned to minimise the risks to those involved or likely to be affected.

3.15.2-WORKING FROM HEIGHT IN CONSTRUCTION

The Work at Height Regulations 2005 applies to all work at height activities.

Reference should also be made to the following Health and Safety Executive (HSE) publications:

INDG401 Working at height a brief guide
HSG150 Health and Safety in Construction

Work at height means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury.

All work will be planned to take the above standards into account and applying the principles of Prevention, with the overriding principle of preventing personal injury from falls.

The Company in conjunction with the Principal Contractor will consider the hazards and risks associated with the particular activity to ensure that the work is planned with consideration for the following:

- To avoid or minimise Work at Height as far as reasonably possible
- Edge protection, barriers or a scaffold to provide a safe place of work
- Mobile work platforms e.g. Mobile Elevating Work Platforms (MEWPs)
- Protection for the public, or other operatives who may be at risk
- Safe means of access to the workplace
- Where necessary, suitable access equipment
- Protection of fragile surfaces

Where falls cannot practically be prevented then a system of fall protection must be used. There are two basic types:

- Those that provide a collective safeguard e.g. safety nets, air bags or bean bags
- Those that provide personal fall protection e.g. safety harnesses attached to a suitable anchorage point

Both systems require appropriate training and supervision to ensure their effectiveness.

Collective safeguards have the advantage over personal fall protection in that they do not rely on supervision to ensure their effectiveness and they may also allow work to be carried out below with less danger from falling objects.

If a personal protection system is used, then a rescue procedure must be planned, communicated to the workforce and implemented prior to work commencing.

Short duration work will also be carefully planned to identify hazards and arrange for the provision and securing of access equipment as necessary.

Training will be provided for supervisors and operatives required to work at height.

The Manager will not permit work to commence at height until the planned safety precautions have been provided. Work at height must not be permitted if safety could be affected by high winds or gusty conditions.

Consideration must be made of conditions that could affect safety, such as extremes of temperature, wet weather or icy conditions.

Materials must not be dropped or thrown down from heights, other than by means of a chute, or suitable safe method.

The main hazards associated with work at height are:

- Falls from unprotected edges
- Falls through incomplete or fragile surfaces
- Objects falling from heights
- Contact with overhead electric cables (see separate section)
- Falls from ladders and other access equipment

All personnel required to work near or below any work at height must wear safety helmets.

Access to the workplaces at height must be prevented to unauthorised persons, particularly children, outside of working hours.

All work at height of short duration or relatively low height should consider the above standards when work is planned to minimise the risks to those involved or likely to be affected.

3.15.3-SCAFFOLDING

All scaffolds erected on Company sites, or used by employees, will be erected in accordance with The Work at Height Regulations 2005.

Reference should also be made to British Standards publications:

- BS EN 12811-1: 2003 Scaffolds – Performance Requirements and General Design.

- BS EN 12811-2: 2004 Temporary Works Equipment – Part 2: Information on materials.
- BS EN 12811-3: 2002 Temporary Works Equipment - Part 3: Load testing
- BS 2482:2009 Specification for Timber Scaffold Boards

Reference should also be made to the NASC publication SG4:22 “Preventing Falls in Scaffolding and Falsework” altering and dismantling scaffolding” and TG20:21 “Guide on tube and fitting scaffolds” has certain pre-designed arrangements of safe heights for Basic scaffolds as unclad, sheeted and with debris netting

Information on the requirements of the Regulations and the British Standards Code of Practice is available from and the British Standards Institute.

All work involving the erection and use of scaffolding will be planned to take the above standards into account.

The Company will arrange for full details of the use and loading of the scaffold to be erected, to be provided to the scaffolding contractor.

Supervisors required to inspect scaffolding and operatives erecting, altering or dismantling scaffolding must be adequately trained.

Before accepting a scaffold erected by a competent scaffolding contractor for use by the Company employees, the Site Manager will obtain a handing over certificate from the scaffolding contractor.

In addition, all scaffolds including mobile towers from which a person could fall 2 metres or more MUST be inspected by the users in accordance with the following schedule:

- Before being taken into use for the first time; and
- After any substantial addition, dismantling or other alteration; and
- After any event likely to have affected its strength or stability; and
- At regular intervals not exceeding 7 days since the last inspection.

A report of the above inspection and any action taken should be made within 24 hours of the inspection, for any platform where a person could fall two metres or more, and recorded in the Scaffold Report of Inspection. For platforms where the fall is less than 2 metres then the inspection must still be undertaken but there is no requirement for a written report to be made.

All materials used for scaffolding will be provided in accordance with the relevant British Standards and will be checked before use by a scaffolder. All materials will be properly stored and maintained on site.

No person, other than a competent scaffolder will be permitted to alter, erect, dismantle or otherwise interfere with any scaffold erected on Company sites or for use by Company employees.

The Site Manager will ensure that all scaffolds are erected on ground or surfaces that have been prepared, levelled and consolidated.

Scaffolders working on company sites should hold Construction Industry Scaffolders Registration Scheme (CISRS) cards and be supervised by a competent CISRS card holder. All scaffolds must be tied or otherwise supported in accordance with the Code of Practice requirements. Where the provision of ties is impracticable, then the method of ensuring that the scaffold is adequately supported must be clearly specified and recorded.

Scaffolders will be expected to follow their Method Statements and guidance from relevant industry standards throughout the process of working on a scaffold. During scaffold erection working methods are to address fall prevention, the requirements of the Guidance SG4:15 will apply and safety harnesses should be worn and used in accordance with the guidance.

Any scaffold being erected, altered or dismantled, or otherwise not suitable for use, must have a notice erected warning that it is not suitable to be used.

All scaffolds must be checked at the end of each working day to ensure that access to the scaffold by unauthorised persons has been prevented.

3.15.4-LADDERS AND STEPLADDERS **LADDERS**

All ladders and step ladders must be provided and used in accordance with The Work at Height Regulations 2005

- Only ladders constructed in accordance with BS EN 131 will be used.
- Steps and Ladders to be used in accordance with LA455 Safe Use of Ladders and Stepladders

- Where it is possible consideration should be given to avoiding work at height or minimising the duration of the activity.
- The contracts manager will select correct access for the type of work and duration.
- The contracts manager will arrange for the required number and type of ladders to be provided, taking into account the above standards and the work to be carried out.
- All work which involves the use of ladders and stepladders will be risk assessed - The means of securing ladders will be planned as far as possible and sufficient materials made available.
- Training provided to supervisors and operatives will include the hazards and precautions relating to ladders and their use.
- Ladders must be checked by the responsible person/site manager/supervisor before use, to ensure that there are no defects, and will be checked at least weekly while in use on site. Where a defect is noted, or a ladder damaged, it will be taken out of use immediately and further usage prevented. The Site Manager will ensure that proper storage is provided for ladders, under cover where possible.
- The responsible person will check that ladders in use are secured, have a solid, level base and are being used correctly. Ladders will not be used to provide access, or a working position, if the type of work cannot be carried out safely from a ladder (e.g. carrying large items, work requiring both hands etc.).

The main hazards associated with ladders are:

- Not securing the ladder properly
- Unsafe use of ladder (over-reaching, sliding down etc.)
- Using ladder where safer method should be provided
- Using ladder with defects
- Unsuitable base to ladder
- Insufficient handhold at top of ladder, or at stepping off position
- Insufficient foothold at each rung
- Using ladder near overhead electrical cables, crane contacts etc.
- Ladder at unsuitable angle, swaying, springing etc. (recommend angle 1 in 4 or 70°).
- Insufficient overlap of extension ladders
- Undertaking two handed work operations

Ladders will be removed to storage, or made inaccessible by some means, at the end of each working day, to ensure that unauthorised access to scaffolds etc. by others, particularly children, is prevented.

STEPLADDERS

When using stepladders:

- Ensure steps are in good condition and rungs have not been damaged
- Ensure ground conditions are stable
- Good lighting is available
- Check all four stepladder feet are in contact with the ground and the steps are level
- Only carry light materials and tools
- Don't overreach
- Don't stand and work on the top three steps/ Step ladders are at the correct height for task
- Ensure any locking devices are engaged
- Ensure locking mechanisms are engaged
- Read risk assessment associated with task
- Ensure steps are placed facing task at hand and do not lean sideways

Ladders and stepladders are not banned under health and safety law, but they should only be used for low-risk, short-duration tasks. Step ladders should be stored adequately when not in use to prevent unauthorised usage.

3.17.0-CONFINED SPACES

3.17.1-WORKING IN CONFINED SPACES

Consideration will be given to alternative methods of working prior to putting staff and sub contractors to work in confined spaces.

Work in confined spaces will only be undertaken by suitably trained and competent persons. A safe system of work must be developed and agreed before the work commences and this will include procedures for dealing with emergency evacuation (rescue plan) from the confined space.

3.18.0-LIFTING OPERATIONS AND EQUIPMENT

3.18.1-LIFTING OPERATIONS

- Lifting operations using a crane will be planned and undertaken under a contract lift arrangement.
- Lift plans will be available prior to any lifts

- All lifting activities will stop if weather circumstances may interfere with works (excessive rain, wind, visibility...)
- Where lifting equipment is to be used evidence of testing and inspection will be obtained by the site manager before the equipment is put into use.
- The lifting equipment selected must be appropriate for the planned lifting operation and used in conjunction with suitable slings, chains, etc.
- Only personnel who are trained and authorised will act as banksmen/slingers for lifting operations.

3.19.0-ACCESS AND EGRESS

3.19.1-HOUSEKEEPING

All operatives working with **MDN UK LTD** must take personal responsibility into ensuring good housekeeping is kept in work areas to reduce potential harm from trips, slips and falling materials from height, particular attention to be given to housekeeping in communal areas (see below) and pedestrian access routes. This is to be monitored from site supervisors.

Regulations which cover housekeeping and access;

The Workplace (Health, Safety and Welfare) Regulations 1992

The Construction (Design & Management) Regulations 2015 (CDM 2015) Part 4

The Electricity at Work Regulations 1989

The Dangerous Substances and Explosive Atmospheres Regulations 2002 require that cylinders and containers be properly stored and removed from work places, when not in use, to storage.

The Health and Safety at Work etc., Act 1974 requires that employers shall ensure that a safe working place and safe accesses are provided for their employees, so far as is reasonably practicable. Employers have a duty to ensure that their work does not affect others, so far as is reasonably practicable. And persons having control of premises have a duty to ensure that the premises are maintained in a safe condition and that all means of access are safe, so far as is reasonably practicable, for persons who are not their employees, but are required to use the premises.

Work in communal areas

- Where work has to be undertaken in communal areas, such as hallways, passageways and staircases, provision will be made to ensure the safe access and egress of all users and will take due care in accordance with the requirements of the pre-construction information.
- The Site Manager will ensure that all work in communal areas is planned so as to cause the least disruption.
- Where passageways or staircases cannot safely be used while work is in progress the Site Manager will make arrangements for such work to be undertaken out of normal working hours and all closures will be communicated to appropriate stakeholders.
- All surplus materials and waste will be cleared from the site daily.
- All materials for use in communal areas will be stored away from the place of work, or in the work area and not allowed to encroach into the area set aside for access and egress.
- Operatives will ensure that all work areas are cordoned off or always identified by warning signs
- Where work in communal areas extends over several days, operatives will ensure that cordons and barriers are positioned and maintained so as to prevent accidental access to the work area.

3.20.0-ELECTRICAL SAFETY

3.20.1-ELECTRICITY AT WORK

All reasonable steps will be taken to secure the health and safety of employees who use, operate or maintain electrical equipment. The company acknowledges that work on electrical equipment can be hazardous and it is therefore the company's intention to reduce the risk as far as is possible.

The implementation of this policy requires the total co-operation of all members' of management and staff, as well as any contractors employed to carry out work involving electrical systems and/or equipment.

Where a problem arises related to electricity at work employees must inform their Manager immediately and the Company will then take the necessary measures to investigate and remedy the situation.

MDN UK LTD will:

- Ensure that electrical installations and equipment are installed in accordance with the IEE (Institute of Electrical Engineers) Wiring Regulations (BS7671)

- Ensure that portable equipment is inspected and tested as frequently as required to maintain it in a safe condition (the frequency will depend on the environment in which the equipment is used and the conditions of usage, i.e. how carefully it is handled)
- Forbid live working on any **MDN UK LTD** project recognising that electrical testing/commissioning has to be dealt with separately.
- Forbid all work by the Company's staff on electrical equipment, unless they are competent to do so.
- Temporary wiring must be as safe as a permanent installation and must be installed and tested by a competent person before being put into service and then be re-tested every three months.

3.21.0-UTILITIES AND SERVICE MANAGEMENT

3.21.1-UNDERGROUND SERVICES

Engineers, architects and statutory authorities must be consulted to establish the location of underground services within the site.

A plan must be prepared showing the location of underground services, where known.

Copies of the plan are to be displayed and made accessible to employees and sub-contractors at all times.

Prior to earthworks starting, an electricity-location survey must be carried out by a competent person and the results plotted on the site plan.

Service locations must be boldly marked and clearly visible.

Operatives must be instructed and trained in safe methods of working.

Where a permit to dig system is established it is to be fully complied with.

Work must not start until a full survey has determined what lies beneath ground level.

Correct road signs and barriers must be established in accordance with current legislation.

A cable locator must be used in all instances to confirm the location of services, which must be clearly marked. (CAT)

Hand digging trials must be used where doubt arises, using a shovel not a fork.

Exposed plant services are to be identified and protected.

Any damage must be immediately reported to the utility provider.

Excavations must be back-filled with approved materials.

3.21.2-EXCAVATIONS

Prior to excavation work starting the location of underground services is to be established.

Before work starts a suitable trench support system must be available on site.

Excavations in poor or unstable ground must have sides that are adequately supported or battered back to a suitable angle of repose for the type of material excavated.

Support work for excavations must be carried out under the supervision of a competent and authorised person. HSE guidance HSG47 shall be considered prior to deep excavation.

Open excavations must be fenced with a rigid physical barrier where persons could be injured from falling or where other hazards such as reinforcing bar are present.

During backfill operations a banksman or stop blocks must be provided to aid the plant operator.

Excavations are to be inspected daily and thoroughly examined weekly by a trained, competent and authorised person with records kept in accordance with current legislation.

3.22.0-STRESS MANAGEMENT AND WELL-BEING

3.22.1-WELFARE

The following will be provided as minimum facilities on all sites, where welfare is provide by the client agreement on their use should be obtained.

- A canteen room with facilities for warming food and boiling water for drinks. Seating with backs will be provided.
- Portable toilets will only be used if mains water or drainage is unavailable or for very short duration works.
- Running hot and cold water
- Sufficient amount of toilets and wash basins
- Changing areas
- Facilities for storing and drying clothing and PPE.
- A toilet unit with facilities for washing. NB on sites with contaminated ground, a shower unit may be required if so this will be detailed in the site health and safety plan.

An adequate supply of fresh drinking water must be provided. If normal mains running water is not available then a supply of water should be provided via containers which are clearly marked "DRINKING WATER".

3.22.2-VIOLENCE TO STAFF

If a person is injured due to an act of violence sustained whilst at work, and as a result of the injuries the person is unable to work as normal then the incident should be classed as a work accident and actions taken according to the degree of injuries and absence from work.

3.22.3-STRESS

MDN UK LTD are committed to protecting the health, safety and welfare of our employees. We recognise that workplace stress is a health and safety issue and acknowledge the importance of identifying and reducing workplace stressors. This policy will apply to everyone in the company. Managers are responsible for implementation and the company is responsible for providing the necessary resources.

Definition of stress

The Health and Safety Executive define stress as “the adverse reaction people have to excessive pressure or other types of demand placed on them”. This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress which can be detrimental to health.

Policy

- The company will identify all workplace stressors and conduct risk assessments to eliminate stress or control the risks from stress. These risk assessments will be regularly reviewed.
- The company will consult with Trade Union Safety Representatives on all proposed action relating to the prevention of workplace stress.
- The company will provide training for all managers and supervisory staff in good management practices.
- The company will provide confidential counselling for staff affected by stress caused by either work or external factors.
- The company will provide adequate resources to enable managers to implement the company's agreed stress management strategy.

Responsibilities

Managers

- Conduct and implement recommendations of risks assessments within their jurisdiction.
- Ensure good communication between management and staff, particularly where there are organisational and procedural changes.
- Ensure staff are fully trained to discharge their duties.
- Ensure staff are provided with meaningful developmental opportunities.
- Monitor workloads to ensure that people are not overloaded.
- Monitor working hours and overtime to ensure that staff are not overworking.
- Monitor holidays to ensure that staff are taking their full entitlement.
- Attend training as requested in good management practice and health and safety.
- Ensure that bullying and harassment is not tolerated within their jurisdiction.
- Be vigilant and offer additional support to a member of staff who is experiencing stress outside work e.g. bereavement or separation.

Occupational health and safety staff

- Provide specialist advice and awareness training on stress.
- Train and support managers in implementing stress risk assessments.
- Support individuals who have been off sick with stress and advise them and their management on a planned return to work.
- Refer to workplace counsellors or specialist agencies as required.
- Monitor and review the effectiveness of measures to reduce stress.
- Inform the employer and the health and safety committee of any changes and developments in the field of stress at work.

Human resources

- Give guidance to managers on the stress policy.
- Help monitor the effectiveness of measures to address stress by collating sickness absence statistics.
- Advise managers and individuals on training requirements.
- Provide continuing support to managers and individuals in a changing environment and encourage referral to occupational workplace counsellors where appropriate.

Employees

- Raise issues of concern with your Safety Representative, line manager or occupational health.
- Accept opportunities for counselling when recommended.

Safety representatives

- Safety Representatives must be meaningfully consulted on any changes to work practices or work design that could precipitate stress.
- Safety Representatives must be able to consult with members on the issue of stress
- Including conducting any workplace surveys.
- Safety Representatives must be meaningfully involved in the risk assessment process.
- Safety Representatives should be allowed access to collective and anonymous data from HR.
- Safety Representatives should be provided with paid time away from normal duties to attend any Trade Union training relating to workplace stress.
- Safety Representatives should conduct joint inspections of the workplace at least every 3 months to ensure that environmental stressors are properly controlled.

Safety Committee

- The joint Safety Committee will perform a pivotal role in ensuring that this policy is implemented.
- The Safety Committee will oversee monitoring of the efficacy of the policy and other measures to reduce stress and promote workplace health and safety

3.22.4-WORKING OUTDOORS

The Workplace (Health, Safety and Welfare) Regulations 1992 and The Construction (Design & Management) Regulations 2015 (CDM 2015) Part 4, applies to work outdoors and requires that consideration is given to ensuring that workers are protected, so far as is reasonably practicable, from adverse weather. This is generally assumed to be poor weather conditions, although these days consideration should also be given to hot weather conditions also.

In non-construction situations the generalities of the Health and Safety at Work etc Act 1974 will apply.

Reference should also be made to the following Health and Safety Executive (HSE) publications:

- INDG337-Sun Protection – Advice for employers of outdoor workers
- INDG147(rev1)-Keep your top on – Advice to outdoor workers

All work will be planned to take the above into account.

This will include the provision of advice and guidance to those likely to be affected and will also include the following:

- Consideration of rescheduling of works activities to when weather conditions are more favourable
- Provision of plenty of drinking water for hot conditions
- Provision of protective clothing suitable for extremes of temperature, either hot or cold
- Suitable shelter for extreme conditions and facilities to warm up or cool down
- Allowance for frequent rest breaks appropriate to the conditions
- Adequate heating and a means to heat food and drinks in cold weather
- Advice on the use of sunscreens and if appropriate the provision of the same
- Education of employees regards the signs and early symptoms of health or cold stress.
- The site manager will advise employees and operatives to take breaks from work in the shade, if possible, on hot sunny days.
- All employees and operatives should be encouraged to check their skin regularly for unusual spots or moles that change shape, size or colour. Medical advice should be sought if they have any concerns.
- Welfare facilities will be established that are suitable for the location.

3.22.5-SMOKING

- It is illegal to smoke in all enclosed workplaces and vehicles used by more than one person in England from 1 July 2007 as a consequence of the Health Act 2006
Smoking will only be permitted in areas explained within the site induction
- No smoking signs to be installed in welfare areas
- Separate smoking and vaping shelters to be made available in safe areas

3.22.6-HEALTH HAZARDS

A number of Regulations impose requirements for the safe handling and use of substances which are known to be a risk to health, these include for example:

- The Control of Asbestos Regulations 2012
- The Control of Lead at Work Regulations 2002
- The Personal Protective Equipment at Work Regulations 1992
- The Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended)
- The Workplace (Health, Safety and Welfare) Regulations 1992
- The Health and Safety (Display Screen Equipment) Regulations 1992

Further information on the requirements of the Regulations, is also covered elsewhere in this Policy
All work will be planned to take the above standards into account.

The Contracts Manager will ensure that, before work starts on site, information is obtained on any material or substance to be used or likely to be encountered which could be a hazard to the health of operatives. If possible, arrangements should be made for an alternative, less hazardous material to be specified.

Any necessary training, protective clothing, equipment, enclosures, extraction equipment, hygiene facilities, medical examinations etc., must be planned before work commences.

Supervisors must ensure that all operatives engaged in any process involving the use or handling of any hazardous substance, will be given full instructions on the health hazards and precautions, use of protective clothing, equipment, hygiene measures etc., as required before they start using the product.

The supervisor will ensure that:

- There is a suitable and sufficient risk assessment in place and that it has been communicated to all relevant persons.
- Protective clothing and equipment will be issued to operatives.
- The hygiene measures provided are maintained, and procedures planned to handle or use any hazardous substance are implemented.
- Measures necessary to protect other workers and the general public from such substances or procedures are provided and maintained.

Approved people, or organisations, will carry out any necessary air sampling, medical examinations, testing etc. as required, and records will be kept on site during the operations.

Health hazards from substances can be divided into the following categories:

- External contact - corrosive, skin absorption, dermatitis etc. (e.g. cement, acids, epoxy resins etc.)
- Inhalation - gases, fumes, dusts, vapours.
- Ingestion - swallowing.
- Injection – needle-stick, high pressure air

The Control of Substances Hazardous to Health 2002 (as amended) is the principal applicable legislation for dealing with dermatitis.

Reference should also be made to the following Health and Safety Executive (HSE) publications:
Hsg262 Managing risks from skin exposure at work
INDG 233 Preventing contact dermatitis and urticaria at work

Dermatitis

Dermatitis is a skin condition caused by contact with something that irritates the skin or causes an allergic reaction.

It usually occurs where the irritant touches the skin, but not always. Symptoms include:

- Redness
- Scaling/flaking
- Blistering
- Weeping
- Cracking
- Swelling
- Someone who has dermatitis may experience symptoms of itching and pain.

There are 2 main types Irritant and Allergic

What causes irritant contact dermatitis?

It can occur quickly after contact with a strong irritant, or over a longer period from repeated contact with weaker irritants. These can be chemical, biological, mechanical or physical. Repeated and prolonged contact with water (e.g. more than 20 hand washes or having wet hands for more than 2 hours per shift) can also cause irritant dermatitis.

What causes allergic contact dermatitis?

This can occur when the sufferer develops an allergy to a substance. Once someone is 'sensitised', it is likely to be permanent and any skin contact with that substance will cause allergic contact dermatitis. Often skin sensitisers are also irritants.

All work will be planned to take the above into account.

This will include the provision of advice and guidance to those likely to be affected and will also include the following:

- COSHH assessments for chemicals that may come in contact with the skin

- Avoiding prolonged contact with any irritant chemical
- Developing safe systems of work so that contact is minimized
- Provision of PPE; with gloves appropriate to the chemical/process in use
- Provision of impervious coveralls when working with wet cement
- Conducting regular skin health checks
- Provision of good hygiene facilities and pre- and post-work creams
- Advice to staff on avoidance of dermatitis
- Investigating cases of ill health and acting on the findings

Employees should always follow the safe system of work and wear the appropriate PPE
The Line Manager will advise employees and operatives to avoid contact with chemicals
Employees should report any skin problems immediately to their supervisor/line manager

3.22.7-ALCOHOL DRUGS AND MEDICATION

MDN UK LTD is committed to providing a safe, healthy and productive working environment for all employees, contractors, customers and visitors involved in its operation. This policy sets out the company's aims in reducing and managing alcohol and drug problems in the workplace.

Alcohol and drug problems are prevalent in society and are associated with a wide variety of costs for both employers and employees. These costs include ill-health sickness absence, reduced work performance and accidents. The consumption of alcohol and drugs has implications for health and safety at work since these substances impair co-ordination, judgement and decision making; as such this is a policy matter.

Policy Aims and Objectives

Aim - To clearly state the company's position on alcohol and drugs within the workplace.

Objectives

- To ensure the company complies with appropriate legislation
- To minimise the risks associated with alcohol and drugs in the workplace
- To have clear rules regarding alcohol and drugs in the workplace
- To provide employees with an education programme on the adverse health effects of alcohol and drugs
- To encourage the early identification of employees who may be experiencing alcohol or drug problems
- To provide support for employees experiencing alcohol and drug problems
- To provide training and support to line managers to ensure they are equipped to support employees experiencing problems

Definitions

- Alcohol problem - An alcohol problem is defined as any drinking, either intermittent or continual which interferes with a person's health and/or social functioning and/or work capability or conduct.
- Drugs - Any drug, whether illegal, prescribed or over the counter or solvents such as glue, butane, etc. In the case of prescribed and over the counter drugs, their possession and use by the employee is acknowledged as legitimate.
- Drug problem - The use of illegal drugs, the deliberate use of prescribed or over the counter drugs (when not for a medical condition) and the use of solvents, either intermittent or continual which interferes with a person's health and/or social functioning and/or work capability or conduct

Legal

The Health and Safety at Work Act 1974 requires employers to protect the health, safety and welfare of their employees and others who may be affected by their activities, as far as is reasonably practicable.

The Management of Health and Safety at Work Regulations 1999 requires employers to carry out a risk assessment to identify hazards in the workplace and put measures in place to minimise these risks.

The Misuse of Drugs Act (1971) is the main legislation covering drugs and categorises them as classes A, B and C. These drugs are called controlled substances and class A drugs are considered to be the most harmful under this act. It is illegal for anyone, whether at work or not to produce, supply or be in possession of illegal drugs. Employers may be liable if they knowingly allow dispensing, manufacturing, possession, using or selling on their premises

Policy Rules

- The company requires all employees to report for duty free from the effects of alcohol and drugs*. It is not acceptable to be under the influence of alcohol or drugs at work or consume alcohol or drugs during hours of work- this includes paid and un-paid breaks.

- Employees found in possession of illegal drugs or using illegal drugs whilst at work will normally be reported to the police.
- In some cases the legitimate use of prescribed drugs can affect a person's ability to do their job. In such instances employees should inform their line manager

Implementation of the Policy

Identification of a problem

Alcohol and drug problems may become apparent through a number of means, for example the following (particularly in combination) may result in a problem being suspected:

- Persistent short term absence
- Unauthorised absence
- Poor time keeping
- Reduced work performance
- Poor working relationships
- Deterioration in appearance

However it must be remembered that these factors can have a number of other causes. Employees experiencing alcohol or drug problems may first become apparent to their colleagues. If a member of staff suspects an alcohol or drug problem in a colleague they should either:

Encourage the person to seek help from support agencies

Report the matter to a manager (particularly if the person is involved in a safety critical job)

Misconduct

This policy is primarily concerned with ongoing alcohol and drugs problems which are classed as capability issues, i.e. where the problem impacts on the person's ability to do their job.

One-off cases where the rules of this policy are breached, such as someone reporting for work clearly under the influence of alcohol or drugs or suffering from the effects of alcohol will be classed as a conduct issue and will be dealt with under the normal disciplinary procedures or dismissal.

Very serious incidents such as violence at work whilst under the influence of alcohol or drugs or dealing illegal drugs at work will be deemed serious misconduct justifying summary dismissal.

In some instances of misconduct where the employee admits to having an alcohol or drug problem, disciplinary proceedings may be held in abeyance subject to successful outcome of treatment.

In instances of serious misconduct where the employee subsequently admits to having an alcohol or drug problem, the support route and the disciplinary route may be implemented in tandem

Voluntary Referral for Support

Employees who suspect or know they have a drug or alcohol problem are encouraged to seek support at an early stage

Referral by Management

Employees suspected of having an alcohol or drug problem will be offered support by their manager.

Where the problem has become apparent through deterioration in work performance, the employee will have to demonstrate satisfactory completion of a programme of support and an improvement in work performance or disciplinary action will be taken.

Employees will be given the opportunity of attending treatment within work time. Alternatively if employees require to be absent from duty normal sick pay arrangements will apply

Confidentiality

The company aims to ensure that the confidentiality of all employees experiencing alcohol or drug problems is maintained by appropriate people, for example, human resources, occupational health and line manager.

Information regarding individual cases will not be divulged to third parties unless the safety of the person concerned or others would be compromised by not doing so

Equal Opportunities

This policy will apply equally to all staff regardless of grade, experience or role within the company

Return to Work

Following treatment the company will endeavour to ensure the employee returns to their existing job.

If the employee is unable to fulfil those duties the company will consider alternative duties.

Promotional prospects will be unaffected following treatment

3.22.8-HORSEPLAY

MDN UK LTD Management prohibits irresponsible behaviour such as horseplay (and other unsafe actions such as scuffling, fighting, etc.) because it creates an adverse effect on safety and the well-being of others. **MDN UK LTD** intends to provide a workplace environment where fun is encouraged, however not at the expense of anyone's safety. Clear boundaries for workplace behaviours and conduct at **MDN UK LTD** work sites are necessary to help keep our employees safe

MDN UK LTD employees are not permitted to participate in horseplay at the **MDN UK LTD** on-site workplace as well as off-site while operating **MDN UK LTD** equipment and/or representing **MDN UK LTD** in any capacity.

Horseplay at **MDN UK LTD** is defined as rough or boisterous play or pranks that occur at the workplace.

Horseplay may include – but is not limited to – activities such as joking using physical contact, playing around, racing, grabbing, foolish vehicle operation, or social pressure to participate in unsafe acts, harassment, and/or unauthorized contests.

RISKS

SAFETY HAZARD: Horseplay becomes a safety hazard when it is difficult for an employee to pay attention to safety – and the job in general – because of employee perception that they must be on the lookout for the next unforeseen horseplay or practical joke

PHYSICAL INJURY: Horseplay can cause serious accident or injury

NON-PHYSICAL HARMS: Even horseplay that does not cause a serious physical accident or injury can have negative results. In addition to safety concerns, humiliation, embarrassment, anger, distrust, and a desire for revenge can result from horseplay and practical jokes;

LIABILITY: Liability may become an issue if someone is hurt physically. The horseplay perpetrator may be liable for damages; and,

LOSS of JOB: Failure to abide by this policy may result in loss of employment

MDN UK LTD employees and Owner/Operators are:

- Required to follow all regulations and work rules to ensure the safety of themselves, employees, and non-employees
- Not permitted to engage in any type of horseplay, regardless of whether they are on-site at the **MDN UK LTD** terminal or off-site yet still being paid for **MDN UK LTD** work activities
- Encouraged to discourage individuals on-site or in the vicinity of **MDN UK LTD** equipment to cease any type of horseplay
- Encouraged to report violations of this policy to the Site manager.

The Site Management is committed to:

- Educating new employees (upon hire) and re-educating existing employees (as deemed necessary) regarding the Horseplay Prevention Policy
- Taking steps to secure the safety and future non-harassment of any known victim(s) of horseplay; and Exercising disciplinary action against those engaging in horseplay, which, if seen to be either purposefully or neglectfully endangering others, may result in immediate termination of employment.
- Supporting, encouraging, and providing the structure for a safe and healthy work environment for all **MDN UK LTD** employees and Owner/Operators

3.22.9-FITNESS FOR WORK PROCEDURE

The purpose of this procedure is to ensure that employees are physically and mentally fit to perform their job responsibilities. This procedure aims to create a safe working environment and reduce the risk of accidents or errors caused by employees who may not be in optimal physical or mental condition.

Scope: This procedure applies to all employees and contractors working for **MDN UK LTD**.

Procedure:

Pre-Employment Medical Assessment: a. Prior to being offered a position, all candidates will be required to undergo a pre-employment medical assessment conducted by a qualified medical professional. b. The purpose of this assessment is to verify the candidate's fitness to perform the job duties and identify any pre-existing medical conditions that may affect their ability to work safely.

Regular Health Check-ups: a. All employees are required to undergo regular health check-ups conducted by a qualified medical professional. b. The frequency of these check-ups will depend on the nature of the job and any specific health risks associated with it. c. The check-ups may include physical examinations, assessments of mental health, vision and hearing tests, and any other relevant tests deemed necessary.

Reporting Illness or Injury: a. Employees must promptly report any illness or injury that may impact their ability to perform their job duties to their immediate supervisor. b. The supervisor will assess the situation and, if necessary, advise the employee to seek medical attention.

Fitness Assessments: a. If there are concerns about an employee's fitness for work due to a medical condition or poor performance, a fitness assessment may be conducted. b. A fitness assessment may include medical examinations, functional capacity tests, or consultations with medical experts to determine the employee's ability to meet job requirements safely.

Rehabilitation and Return to Work Plans: a. If an employee is temporarily unable to work due to illness or injury, a rehabilitation and return to work plan will be created. b. This plan will be developed in consultation with the employee, their medical professional, and the supervisor. c. The plan may include modified duties or arrangements to facilitate a safe and gradual return to work.

Confidentiality: a. All medical information obtained during the fitness for work assessments and check-ups will be kept confidential and will only be accessed by authorized personnel on a need-to-know basis.

Non-Compliance: a. Failure to comply with this procedure may result in disciplinary action, up to and including termination.

3.22.10-LONE WORKERS

Where employees are expected to work alone or in isolated situations, a thorough risk assessment will be carried out by a competent person, to identify risks and evaluate the effectiveness of existing control measures as well as making recommendations for the implementation of further controls where appropriate. The following considerations will be made:

- Does the workplace present a specific risk to the lone worker, for example due to temporary access equipment, manual handling issues etc.?
- Is there safe access/egress to the working area?
- If there any equipment involved in the work, can that one person operate it safely?
- Is training up to date and is the person competent to carry out the work involved?
- Is there a risk of violence and /or aggression?
- Are there any reasons why the individual might be more vulnerable than others and be particularly at risk if they work alone? (E.g. health conditions)
- What are the foreseeable emergencies?
- Where is the local hospital?
- If the lone workers first language is not English, are suitable arrangements in place to ensure clear communications, especially in an emergency
- Methods of communication to be adopted (mobile phone/ satellite phone if reception is poor/radio/CB radio/GPS Spot device)
- Methods of review and monitoring of the lone worker.

The fundamental principle is that lone working is prohibited without the specific permission of an authorised manager, this permission will only be granted once stringent checks have been made to ensure that all necessary precautions have been taken and that it is safe for work to go ahead.

3.23.0-TEMPORARY WORKS

3.23.1-MANAGING TEMPORARY WORKS

MDN UK LTD is committed to a policy of effectively controlling all aspects of Temporary Works in accordance with BS5975 Code of practice for temporary works procedures and the permissible stress design of falsework to ensure that all Temporary Works needs are identified and that safe and practical designs are produced and then correctly and safely constructed, loaded and dismantled.

The successful control of Temporary Works requires a systematic and methodical approach including the appointment of competent individuals for all roles, effective communication between all parties and the maintenance of comprehensive records.

The statements below set out the overall principles of how Temporary Works will be controlled on **MDN UK LTD** sites.

1. A competent Temporary Works Coordinator employed by **MDN UK LTD** will be formally appointed in writing for every site.
2. On any site where it is necessary one or more competent Temporary Works Supervisors will be formally appointed in writing to assist the Temporary Works Coordinator.
3. Temporary works designs will be managed under the company's Design Management QA procedures and all sites will have a Temporary Works register recording all Temporary Works requirements.
4. All site specific Temporary Works designs will have a suitable design brief which provides all relevant information on which the designer is to base their design.
5. All Temporary Works designs must be prepared and checked by competent designers. Temporary works Design is not undertaken 'in-house' but will be undertaken by either proprietary suppliers e.g. formwork/trench support or external design consultants.
6. For all Temporary Works designs the independence between the designer and design checker, as defined by the design check category, will be appropriate for the complexity of the Temporary Works design.

7. All Temporary Works designs will be complete providing all information required for the successful implementation of the design in a clear and easily understandable format that is issued in a way that allows the latest version to be easily identified (e.g. unique reference number and revision).
8. Temporary Works will only be implemented in accordance with a design that has been checked and issued for construction.
9. All Temporary Works will be inspected by the Temporary Works Coordinator or Temporary Works Supervisor during construction and prior to use to ensure it is in accordance with the latest version of the design with a permit to use being issued where necessary.
10. Whilst in use all Temporary Works will be inspected at regular intervals by the Temporary Works Coordinator or Temporary Works Supervisor to ensure they remain in accordance with the latest version of the design. Legal requirements for inspections of Temporary Works including excavations and scaffolding will be complied with.
11. The Temporary Works Coordinator will ensure that any changes to Temporary Works designs proposed on site or any changes in the information on which a Temporary Works design has been based which become apparent on site are referred back to the Temporary Works designer so that the design can be revised and updated as necessary.
12. All Temporary Works will be inspected by the Temporary Works Coordinator or Temporary Works Supervisor prior to dismantling to ensure that the appropriate tests and checks have been carried out to demonstrate that the Temporary Works are no longer required with a permit to dismantle being issued where necessary.

MDN UK LTD carries out a wide variety of construction work and whilst this policy statement are equal applicable to all sites, the implementation of the procedure and the appointment of competent Temporary Works Coordinators and Temporary Works Supervisors is the responsibility of the Contracts Managers responsible for individual sites.

3.24.0-OFFICE SAFETY

3.24.1-DISPLAY SCREEN EQUIPMENT

The term 'display screen equipment' (DSE) is used to describe not only the visual display unit (VDU) of a computer but also the other computer equipment and the workstation where it is used i.e. the desk, work surface, chair, input devices, software, printer and document holder.

The risk posed to office staff using DSE shall be assessed and controlled in accordance with health and safety regulations particularly DSE specific regulations. The aim of such assessments is to prevent work related upper limb disorders (WRULD), lower back problems, eye strain, stress and repetitive strain injury (RSI).

Any employee that works with DSE for more than two hours per day, when averaged over a four week period, will be classed as a "DSE User". All "DSE Users" will be provided with an eyesight test by a competent person, free of charge.

Where an eyesight test identifies that a "DSE User" requires special corrective appliances to work with DSE, we will contribute to the cost of providing such appliances. If this applies to you, you should contact the Managing Director for details.

All workstations should be subject to a DSE assessment, this should be carried out by a competent person and the findings of the assessment shall be communicated to those affected.

We recommend that if you use DSE for long periods, you break up the time spent working with DSE by working away from the screen for 10 minutes after 60 minutes of continuous use.

If you experience visual difficulties, headaches or pains in the upper limbs or shoulders when working with DSE you should bring this to the attention of the Managing Director.

Additional organisational policies and Plans

4.1-ANTI-BRIBERY AND CORRUPTION POLICY

MDN UK LTD Anti-Bribery and Corruption Policy

1. Introduction

MDN UK LTD values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the firm's staff as well as others acting on the firm's behalf are key to maintaining these standards.

The purpose of this document is to set out the firm's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with the **MDN UK LTD**, within all regions, areas and functions.

2. Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

3. Penalties

The Bribery Act 2010 came into force on 1 July 2011. Under that Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the firm is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the firm.

4. MDN UK LTD's Policy

MDN UK LTD will not tolerate bribery or corruption in any form.

The firm prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company;
- by any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;
- in order to gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.
- This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:
 - Director approved hospitality events or dinners.
 - Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to your supervisor. If necessary, guidance should also be sought from a company director.

The firm will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

5. Key risk areas

Bribery can be a risk in many areas of the firm. Below are the key areas you should be aware of in particular:

Excessive gifts, entertainment and hospitality: can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they have the express permission of a company director.

Facilitation payments: are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The firm will not tolerate or excuse such payments being made.

Reciprocal agreements: or any other form of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management.

Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.

Actions by third parties for which the firm may be held responsible: can include a range of people i.e. agents, contractors and consultants, acting on the firm's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.

Record keeping: can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

6. Employee responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the firm. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

Any such incidents should be reported to a company director as soon as is practical.

Signed:

Dated:

4.2-EQUAL OPPORTUNITIES POLICY

MDN UK LTD is committed to Equal Opportunities for all, regardless of marital status, sex, sexuality, colour, ethnic or national origin, race, disability or age in terms of employment.

The Company is aware that discrimination still exists and is committed to taking definite steps to eliminate discrimination and promote good relations for all.

The Company's policy on Equal Opportunities is applicable to all members of staff and also aims to encourage co-operation from consultants, contractors, suppliers and others employed by the Company.

This policy is prepared in accordance with the Equality Act 2010

EMPLOYMENT

Objective:

To ensure that the talents and resources of staff are utilised to the maximum and that no employee, job applicant or sub-contractor receives less favourable treatment on the grounds of marital status, sex, sexuality, colour ethnic or national origin, race, disability or age in terms of employment either directly or indirectly.

Implementation:

All staff are given a copy of the Company Policy on Equal Opportunities. All staff are made aware of their individual responsibilities in respect of equal opportunities.

Written instructions and guidelines on recruitment, selection, promotion and dismissal are issued to the appropriate supervisory staff.

Staff will be consulted on the policy and their opinions discussed. Any necessary alterations to the policy or systems will be implemented and the staff and others informed.

Recruitment:

All jobs are to be made open to all applicants regardless of marital status, sex, sexuality, colour, ethnic or national origin, race, disability or age.

All advertisements will clearly state that **MDN UK LTD** is an Equal Opportunities Employer. Vacancies will be advertised using a wide range of organisations and publications such as Job Centres, Careers Offices, Local Press, Race Equality Councils, etc., as appropriate in order to attract interest from a wider community.

Selections:

Managers who recruit and conduct interviews will take an unbiased approach regardless of the applicants marital status, sex, sexuality, colour, ethnic or national origin, race, disability, or age. Questions will relate to the job and will be non-discriminatory. Applicants will be measured against the requirements of the job. The procedures for selection will be reviewed periodically to ensure that they remain non-discriminatory.

Promotion:

The criteria for promotions will relate specifically to the individual's ability and aptitude for the job regardless of marital status, sex, sexuality, colour, ethnic or national origin, race, disability or age. The procedures for promotion will be reviewed periodically to ensure that they remain non-discriminatory.

Dismissal:

The procedure and criteria for selection of staff for dismissal must ensure that they do not directly or indirectly discriminate against a particular group or groups.

Selection will relate specifically to the individual's ability and aptitude or the current economic situation and will be non-discriminatory.

Positive action will be taken to overcome past discrimination.

Disciplinary & Grievance Procedure:

All grievances will be investigated at the earliest opportunity and action taken.

Exact details will be taken of the conduct which is complained of and employees will be given the right to reply.

Employees will have the right to have a representative or colleague present at any disciplinary meeting.

Employees will be notified of the result of any disciplinary meeting.

Where necessary and appropriate Guaranteed Asphalt will enlist the services of outside consultants. Any necessary action will be taken and recorded.

Victimisation:

All staff will be made aware that it is unlawful to victimise any individual and that should they not desist, they will be subject to disciplinary action including possible dismissal and legal proceedings.

Training:

All persons responsible for recruitment selection, promotion or dismissal will receive ongoing training in Equal Opportunities and Race Relations.

Training will be aimed at achieving the following objectives:-

- 1.To enable staff to recognise and conform to the Company's and their own legal obligations under Equal Opportunities and Race Relations legislation.
- 2.To develop the skills to translate the legislation in employment practice into practice.

Monitoring:

The Equal Opportunities policy will be reviewed regularly or as legislation alters and the following procedures will be observed:-

The policy will be reviewed and any amendments/alterations will be made. All staff will be made aware of any changes.

The meeting will comprise of:

- The Director responsible for Equal Opportunities.
- All supervisors and contacts managers.
- Representative of the staff.
- Minutes will be kept.
- A follow-up date will be set.

Signed:

Dated:

4.3-ANTI-SLAVERY POLICY

This Anti-Slavery Policy Statement outlines our commitment to preventing slavery and human trafficking in all forms within our operations and supply chains. We recognize that slavery and human trafficking are serious violations of human rights and are committed to conducting our business ethically and in compliance with all relevant laws and regulations.

MDN UK LTD is committed to ensuring that there is no form of modern slavery or human trafficking within our business operations or supply chains.

We operate in accordance with the Modern Slavery Act 2015 and will take all necessary steps to prevent slavery and human trafficking:

- **MDN UK LTD** strictly prohibits the use of forced labour, child labour, or any other form of modern slavery.
- We ensure that all employees are treated fairly and provided with appropriate working conditions, in line with national and international labour standards.
- We comply with all applicable laws and regulations relating to modern slavery and human trafficking.
- We have implemented clear procedures to identify and address any risks or instances of modern slavery within our organisation and supply chains.
- We provide training and awareness programs to our employees to ensure they understand the signs of modern slavery and their responsibility to report any concerns.
- We engage in regular monitoring and auditing of our supply chains to ensure compliance with our policies.
- We collaborate with our suppliers to promote ethical working practices and hold them accountable for their actions.
- We encourage and provide support to our employees, suppliers, and stakeholders to report any suspicions or concerns regarding modern slavery.
- We will investigate any reported concerns promptly and take appropriate action, which may include terminating relationships with any party involved in modern slavery.
- We are committed to continually improving our policies and processes to eradicate modern slavery and human trafficking.

This policy statement is communicated to all our employees, suppliers, and stakeholders, and is available to the public on our website. We regularly review and update our policy statement to reflect changes in legislation and best practices.

Signed:

Dated:

4.4-SUSTAINABILITY POLICY

MDN UK LTD delivers a comprehensive service from project inception through design, manufacturing, construction and maintenance. The scope of this policy covers all UK operations. We strive to deliver sustainable solutions guided by our values and we engage with our teams, customers and supply chain for the benefit of those stakeholders in the wider community and environment in which we work and live.

It is important to us to emphasise the social, economic and environmental impact of our business in everything we do, and this policy reflects our commitment to ensuring that sustainability is considered through all our business decisions.

A framework of supplementary subject-lead policies* and codes embed sustainability in our business. Below are some of the overarching sustainability objectives of **MDN UK LTD**:

- Offer career development, supporting our teams to be diverse, engaged, motivated and competent - together working towards the sustainable success of our business
- Engage positively with civic projects and the local communities in which we work, both through specific project engagement and through company-wide initiatives
- Deliver sustainable profitable growth while satisfying our ethical, legal and contractual obligations
- Improve resource efficiency, sustainable consumption, and production, throughout the whole supply chain from design onwards
- Encourage ideas and innovation, internally and with our supply chain, that can create financial savings and benefit our customers, society and environment
- Demand sector-leading Health, Safety and Environmental performance from our own teams and our subcontractors
- Integrate our sustainability goals throughout our operations
- Commit to measuring our impact through Health, Safety and Environmental performance data, employee engagement surveys, customer satisfaction feedback and our financial performance.

This policy will be reviewed annually, and be adapted if changes to the company occur. This policy will be communicated to all staff via the employee induction and copies will be posted on all our office notice boards.

Signed:

Dated:

4.5-DISCIPLINARY POLICY

The purpose of a disciplinary procedure is to ensure the safe and effective operation of the business and to promote fair treatment of individual employees. The following procedure provides a framework to address any lapses in conduct [or attendance] and encourages individual employees to achieve and maintain an acceptable standard.

This procedure applies to all employees. It does not form part of your terms and conditions of employment.

This policy does not apply to dismissals, where the employment is terminated for a reason unconnected to disciplinary action, such as in the event of redundancy, retirement, or non-renewal of a fixed term contract. If these situations arise the Company will follow a fair and reasonable procedure, which will include consultation with you prior to any dismissal taking effect.

Informal Warnings

Minor breaches of Company standards may result in an informal warning being given to you by [your immediate manager]. The objective of the warning is to help you to improve your conduct [or attendance] without having to use a formal procedure.

An informal warning is normally given verbally, although a note may be kept in your personnel file of what was discussed and what was agreed. Your manager will monitor your conduct [or attendance] over an agreed period. If you do not improve satisfactorily, or there are any further breaches of Company standards, then the formal disciplinary procedure will be invoked.

Investigation

If it becomes necessary to formally address issues regarding your conduct [or attendance] the matter will first be investigated by [HR or an appropriate manager].

This investigation will be carried out thoroughly and as quickly as possible in all the circumstances. Confidentiality will be maintained, as far as is reasonably practicable, during the investigation and throughout the disciplinary process, should this be activated.

Under certain circumstances, including but not limited to harassment, harassment, theft and violence, the Company may decide to suspend you on [full] [basic] pay, while the matter is being investigated. This is not a disciplinary sanction, but a way of ensuring that a full review of the circumstances can take place as effectively as possible.

Criminal Charges

Where your conduct is the subject of a criminal investigation, charge or conviction we will investigate the facts before deciding whether to take formal disciplinary action. We will not usually wait for the outcome of any prosecution before deciding what action, if any, to take. Where you are unable or have been advised not to attend a disciplinary hearing or say anything about a pending criminal matter, we may have to take a decision based on the available evidence.

A criminal investigation, charge or conviction relating to conduct outside work may be treated as a disciplinary matter if we consider that it is relevant to your employment.

Disciplinary Meeting

If, after an investigation has been carried out, it is considered that there is a case to answer, you will be notified in writing of the nature of the complaint against you. You will be provided with details of any supporting evidence which may be available and will be invited to attend a disciplinary meeting. You will be advised that disciplinary action may be taken as a result of this meeting and of your statutory right to be accompanied at this meeting by a colleague or a trade union representative. You should take reasonable steps to attend this meeting. If you are persistently unable or unwilling to attend, the Company reserves the right to proceed in your absence.

This meeting will be conducted by an appropriate manager, who will have played no part in the investigation process. The Company may also have someone present at the meeting to take notes.

At this meeting the nature of the alleged breach of Company standards will be made clear to you and you will be given the opportunity to state your case and call any relevant witnesses. If any additional issues arise during this meeting, an adjournment may take place to allow further investigation.

During the disciplinary process or appeal, you will be provided with copies of any notes, witness statements or interview transcripts that the Company considers to be relevant as soon as they become available.

Right to be Accompanied

You may bring a companion to any disciplinary hearing or appeal hearing under this procedure. The companion may be either a trade union representative or a colleague. You must tell [HR] who your chosen companion is, [in good time/at least 24 hours] before the hearing. The companion is allowed reasonable time off from duties without loss of pay but no-one is obliged to act as a companion if they do not wish to do so. If your companion is unavailable at the time a meeting is scheduled and will not be available for more than five working days afterwards we may ask you to choose someone else.

Disciplinary Action

If, at the conclusion of a disciplinary meeting, or shortly thereafter, it is decided that there has been a breach of standards, formal disciplinary action will be taken.

If you are issued with a warning, you will be informed of the period for which the warning will remain in place. A copy of the written warning will be kept in your personnel file. If your conduct [or attendance] has reached an acceptable level after the specified period, the warning will be disregarded for disciplinary purposes, but will be kept on your personnel file.

If you wish to appeal against any level of disciplinary sanction, including dismissal, you should follow the procedure for appeals set out below.

Stage 1 – Oral Warning

If your conduct[or attendance] is unsatisfactory or there is no improvement, or another breach of Company standards occurs, after an informal warning has been issued, you will be given a formal ORAL WARNING, a note of which will be held on your personnel file. You will also be reminded that if there is no improvement, or a further breach occurs, within a specified period, further disciplinary action will be taken.

Stage 2 – Written Warning

If the breach of Company standards is more serious, or there is no improvement in your conduct [or attendance] or another breach of Company standards occurs, you will receive a WRITTEN WARNING. This will include the reason for the warning, give details of how you should improve and remind you that if there is no improvement, or a further breach occurs, within the specified period, further disciplinary action will be taken.

Stage 3 – Final Written Warning

If the breach of Company standards is very serious, or there is still no improvement in your conduct [or attendance] or another breach of Company standards occurs, despite a previous warning, a FINAL WRITTEN WARNING will be given. This will include the reason for the warning, giving details of how you should improve, and remind you that if there is no improvement, or a further breach occurs, within the specified period, you may be DISMISSED.

Stage 4 – Dismissal or other disciplinary action

If there is no satisfactory improvement in your conduct [or attendance] or if a further breach of Company standards occurs, you may be DISMISSED (or other disciplinary action may be taken i.e. demotion/ transfer/ reduction of pay/ suspension without pay). You will be informed in writing of the decision, given details of the reason for the dismissal, or other disciplinary action, your termination date (if relevant), the appropriate period of notice or amount of pay in lieu of notice, and details of your right to appeal.

A decision to dismiss or impose other disciplinary action will normally be taken by a senior manager and dismissal will only be applied if the Company does not consider any alternative to dismissal would be appropriate.

If you are dismissed under this policy your employment will terminate on the date specified in writing. Your employment will NOT be suspended pending the outcome of any appeal procedure. Should an appeal reverse the decision to dismiss you, you will be reinstated with no break in service and any monies owing to you will be paid.

Any of the above stages of disciplinary action may be omitted, depending on the seriousness of the misconduct.

Gross Misconduct

If you are found guilty of gross misconduct the Company is entitled to summarily dismiss you. This means that you will be dismissed with immediate effect, without notice or pay in lieu of notice. Alternatively, the Company may impose another penalty short of dismissal.

Examples of gross misconduct include, but are not limited to:

- Theft, fraud or deliberate falsification of records
- Misuse, abuse or deliberate damage to Company property, including intellectual property, or that of other employees
- The supply or possession of alcohol or illegal drugs, or being under the influence of alcohol or illegal drugs on the Company's premises or during working hours
- Physical violence, actual or threatened
- Serious act of insubordination
- Inappropriate use of internet, intranet and email facilities
- Harassment or discrimination on any grounds
- Accepting or offering a bribe [or any other breach of the Company's anti-corruption and bribery policy]
- Disclosure of confidential information
- Serious breach of the health and safety rules
- Serious or repeated negligent acts in the performance of your duties
- Persistent or serious failure to follow reasonable instructions
- Giving false or misleading information to the Company
- Leaving the workplace without permission or reasonable excuse
- Serious disregard for rules or instructions given by the Company
- Unauthorised absence
- Bringing the Company into disrepute

Procedures to appeal against Dismissal or other Disciplinary Action

Your appeal must be made in writing to HR/a senior manager within 5 working days of the decision being communicated to you in writing and you should detail your reason(s) for appealing against the disciplinary action.

Your appeal will be considered by a senior manager, who, when practicable, will not have had any previous involvement in your case, within 5 working days of receiving your appeal. If it is anticipated that the appeal process will take longer than 5 working days from receipt of your appeal you will be informed of this and of the expected timescale.

You will be notified of your statutory right to be accompanied at the appeal meeting by a colleague or a trade union representative. If additional issues or new evidence arise during this meeting, an adjournment may take place to allow for these to be investigated.

After considering your appeal, a decision may be taken to uphold the dismissal or other disciplinary action or to overturn the findings of the disciplinary meeting. You will be informed of the outcome of the appeal and the reasons for the decision in writing, as soon as possible. The decision which is reached is final.

Signed:

Dated:

4.6-GRIEVANCE POLICY

The grievance policy is designed to provide a fair and consistent process for employees to voice and resolve their concerns or complaints related to workplace issues, including but not limited to, harassment, discrimination, unethical behaviour, or any violation of company policies.

This policy applies to all employees, including full-time, part-time, temporary, and contract workers. It covers grievances pertaining to actions or decisions within the company that affect work conditions, relationships, or the overall work environment.

Procedure:

- **Informal Resolution:** Employees are encouraged to initially address their concerns informally with their immediate supervisor, manager, or any other relevant party involved. They are urged to maintain open communication to find a resolution that satisfies all parties involved.
- **Formal Grievance:** If the issue remains unresolved, the employee may file a formal grievance. The grievance should be submitted in written form, including details of the incident or concern, relevant dates, names of witnesses (if any), and any evidence or supporting documentation.
- **Grievance Review:** Upon receipt of the formal grievance, the Human Resources department will conduct a thorough review. This stage involves gathering all necessary information, conducting interviews with involved parties and witnesses, and reviewing relevant policies and procedures.
- **Investigation:** Following the initial review, an investigation will be conducted to assess the validity of the grievance. The investigator may request additional information or documentation and will ensure that appropriate confidentiality measures are in place.

- Resolution: Based on the findings of the investigation, the company will take appropriate action to resolve the grievance, which may include disciplinary action, mediation, counselling, or any other suitable measures. The employee will be informed of the outcome in a timely manner.
- Appeal Process: If the employee is unsatisfied with the resolution, they may submit an appeal in writing within a designated time frame. The appeal will be reviewed by a designated appeals committee, comprised of unbiased representatives from various departments within the company.
- Final Decision: The appeals committee will conduct a thorough review of the appeal, considering all relevant information and ensuring compliance with company policies and legal requirements. The committee will communicate the final decision to the employee within a specified time frame, which will be binding and conclude the grievance process.

Confidentiality: All parties involved in the grievance process, including employees, witnesses, and investigators, are required to maintain strict confidentiality. Only individuals who need to know the details for the purpose of investigation and resolution will be provided with access to the information.

Non-Retaliation: The company strictly prohibits any retaliation against an employee who files a grievance, assists in an investigation, or participates in the resolution process. Any form of retaliation will be subject to disciplinary action, up to and including termination.

Signed:

Dated:

4.7-WHISTLE BLOWING POLICY

The purpose of this policy is to encourage employees to report any unethical or illegal conduct within the organisation without fear of retaliation. Whistle blowing is essential for maintaining a transparent and ethical work environment.

Scope: This policy applies to all employees, contractors, vendors, and third parties associated with the organisation.

Reporting Procedure: Employees are encouraged to report any unethical or illegal conduct they witness in the workplace. Reports can be made anonymously through the organisation's designated reporting system, which may include a hotline, email, or in-person report to a designated contact person.

Protection against Retaliation: Employees who report in good faith are protected against any form of retaliation, including but not limited to termination, demotion, harassment, or discrimination. Any employee found to be engaging in retaliatory actions will be subject to disciplinary action.

Investigation Process: All reports of unethical or illegal conduct will be promptly and thoroughly investigated by the appropriate department within the organisation. The investigation will be conducted in a fair and objective manner, and all parties involved will be treated with respect and confidentiality.

Follow-Up: After the investigation is complete, the organisation will take appropriate actions to address the reported conduct. This may include disciplinary action, changes to policies or procedures, or further training for employees.

Non-Retaliation Policy: It is against the organisation's policy to retaliate against any employee who reports unethical or illegal conduct. Any retaliation will be taken seriously and may result in disciplinary action, up to and including termination.

Confidentiality: All reports of unethical or illegal conduct will be kept confidential to the extent possible, while still allowing for a thorough investigation to take place.

Conclusion: The organisation is committed to maintaining a culture of integrity and transparency. Employees are encouraged to speak up and report any concerns they may have without fear of retaliation. By working together, we can ensure a safe and ethical work environment for all.

Signed:

Dated:

4.8-ILLEGAL WORKERS POLICY

It is unlawful to employ workers who are not authorized to work in the country. This includes individuals who do not have the necessary work permits or visas.

All employees must be required to provide valid documentation proving their eligibility to work in the country at the time of hire.

Any employer found to be employing workers illegally will face immediate termination of the employees in question and potential legal action.

MDN UK LTD will cooperate with immigration authorities in the event that an employee is found to be working illegally.

MDN UK LTD will conduct regular audits of employee documentation to ensure compliance with immigration laws.

Any employee found to be working illegally will be reported to the appropriate authorities and will be subject to termination.

It is the responsibility of all managers and supervisors to ensure that employees under their supervision are legally allowed to work in the country.

Any concerns or suspicions about an employee's legal status should be reported to the HR department immediately.

The company will not knowingly hire individuals who are unauthorized to work in the country.

The company will provide training to all employees on the importance of complying with immigration laws and the consequences of hiring illegal workers.

The company will carry out employee checks to ensure the employee is not subject to any immigration restrictions

Signed:

Dated:

4.9-PREVENTING TAX EVASION POLICY

MDN UK LTD Will ensure that all employees are informed of the company's policies and procedures regarding tax evasion and criminal facilitation.

Implement training programs for employees on how to recognize and prevent criminal facilitation of tax evasion.

Conduct regular risk assessments to identify potential areas of vulnerability to criminal facilitation of tax evasion within the organisation.

Establish clear reporting mechanisms for employees to raise concerns or suspicions of potential criminal facilitation of tax evasion.

Monitor and review internal controls and procedures to ensure that they are effective in preventing criminal facilitation of tax evasion.

Take appropriate disciplinary action against employees who are found to have facilitated tax evasion.

Cooperate with law enforcement authorities in any investigations into criminal facilitation of tax evasion within the organisation.

Keep accurate and up-to-date records of all activities related to preventing criminal facilitation of tax evasion.

Implement regular audits to assess the effectiveness of the company's procedures for preventing criminal facilitation of tax evasion.

Continuously review and update policies and procedures as necessary to ensure compliance with all relevant laws and regulations related to tax evasion prevention.

Signed:

Dated:

4.10-DATA PROTECTION POLICY

MDN UK LTD is committed to protecting the privacy and security of personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). This policy outlines how **MDN UK LTD** collects, processes, and stores personal data, as well as the rights of individuals in relation to their personal data.

Data Protection Principles

MDN UK LTD processes personal data in accordance with the following principles:

Lawfulness, fairness, and transparency: Personal data is processed lawfully, fairly, and in a transparent manner.

Purpose limitation: Personal data is collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Data minimisation: Personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

Accuracy: Personal data is accurate and, where necessary, kept up to date.

Storage limitation: Personal data is kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.

Integrity and confidentiality: Personal data is processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

Data Collection

MDN UK LTD collects personal data directly from individuals when they provide it to us

Data Processing

MDN UK LTD processes personal data for the following purposes:

Communicating with customers and responding to inquiries

Compliance with legal obligations

Data Storage

MDN UK LTD stores personal data in secure databases and servers. We have implemented appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction, or damage such as firewalls, password protection systems and virus scanning.

Data Subject Rights

- Individuals have the following rights in relation to their personal data:
- Right to access: Individuals have the right to request access to their personal data.
- Right to rectification: Individuals have the right to request the correction of inaccurate or incomplete personal data.
- Right to erasure: Individuals have the right to request the deletion of their personal data.
- Right to restrict processing: Individuals have the right to request the restriction of the processing of their personal data.
- Right to data portability: Individuals have the right to receive their personal data in a structured, commonly used, and machine-readable format.
- Right to object: Individuals have the right to object to the processing of their personal data.

Data Breach

In the event of a data breach involving personal data, **MDN UK LTD** will promptly investigate the breach, take steps to mitigate any harm to individuals

Training

Employees will be trained to ensure compliance with data protection

Policy Review

This policy will be reviewed and updated on a regular basis to ensure compliance with data protection laws and regulations.

Signed:

Dated:

4.11-ORGANISATIONAL COMPLIANCE PLAN

Organisational compliance refers to:

- Conforming to laws, regulations, guidelines, and standards relevant to a particular industry or sector.
- Adhering to prescribed rules and fulfilling obligations to ensure legal and ethical conduct in business operations.
- Ensuring organisations operate with integrity and accountability.
- Implementing actions and programs to ensure compliance with internal policies, procedures, and accepted behaviour, as well as external regulations.

MDN UK LTD are proud to announce that our organisation's compliance meets the standard set by UKCA or UK(NI). We have diligently reviewed and implemented all necessary regulations and requirements to ensure that we are in full adherence with the guidelines set forth by the UK authorities. Our dedication to compliance is steadfast, and we will continue to monitor and update our practices as needed to maintain our accreditation. We are committed to upholding the highest standards of quality and safety in all aspects of our operations. Monitoring is carried out from suppliers and quality engineers to ensure standards are met.

Signed:

Dated:

4.12-SUPPLIERS QUALITY MANAGEMENT PLAN

State the purpose of the SQMP and its importance in ensuring supplier quality.

Scope: Define the scope of the SQMP, including which suppliers and processes it covers.

Objectives

Outline the key objectives of the SQMP, including:

- Ensuring supplier compliance with quality standards
- Reducing non-conformance and improving product quality
- Enhancing communication and collaboration with suppliers

Supplier Selection Criteria

Qualifications: Define the minimum qualifications needed for suppliers.

Quality Assurance: Outline the quality certifications required (e.g., ISO 9001, ISO/TS 16949).

Previous Performance: Consideration of past performance, references and previous working relationships.

Supplier Evaluation Process

Initial Assessment:

- Conduct a quality survey or audit.
- Review documentation and certifications.
- On-site Audits:
- Schedule and perform regular audits.
- Include criteria for evaluation (e.g., quality management system, process control, and capability).
- Performance Metrics:
- Define key performance indicators (KPIs) to assess supplier quality.

Quality Assurance Requirements

Quality Control Plans: Expect suppliers to provide quality control plans upon contract initiation.

Acceptance Criteria: Define acceptance criteria for materials, components, or services.

Documentation Requirements: Specify documentation (e.g., certificates of conformity, test reports) suppliers must provide.

Supplier Performance Monitoring

Performance Reviews: Schedule regular performance reviews (quarterly, semi-annually).

Feedback Mechanism: Establish a feedback loop for continuous improvement discussing performance results with suppliers.

Non-Conformance Management

Identification & Reporting: Procedures for identifying and reporting non-conformance.

Root Cause Analysis: Define steps for conducting root cause analysis.

Corrective Actions: Outline how corrective actions are to be developed, implemented, and monitored.

Continuous Improvement

Quality Improvement Programs: Encourage and assist suppliers in quality improvement initiatives.

Training & Development: Identify areas where training may be beneficial for suppliers.

Communication

Points of Contact: Define key points of contact for both the organisation and suppliers.

Regular Meetings: Schedule regular meetings to discuss performance, challenges, and opportunities for improvement.

Documentation and Records

Record Keeping: Outline documentation and record-keeping requirements for supplier quality management activities.

Confidentiality: Address how confidential supplier information will be handled.

Review and Updates

Plan Review Frequency: Specify how often the SQMP will be reviewed and updated.

Change Management: Describe the process for managing changes to the SQMP.

Signed:

Dated:

4.13-SAFE WORKING HOURS POLICY

The purpose of this policy is to outline **MDN UK LTD**'s commitment to ensuring safe working hours for all employees. We aim to promote a healthy work-life balance while ensuring compliance with the Working Time Regulations 1998.

Scope

This policy applies to all employees of **MDN UK LTD**'s, including full-time, part-time, temporary, and contract staff.

Definitions

Working Time: The time when an employee is required to be at work or carrying out duties as part of their employment.

Rest Period: A break during the working day, time between shifts, or days off.

Working Hours

The standard working hours are [8 AM to 5 PM, Monday to Friday].

Employees should **not** exceed an average of 48 hours of work per week unless they have opted out of this limit voluntarily in writing.

Breaks

Employees are entitled to a 30-minute break during a work period of 6 hours

Rest breaks should be scheduled to ensure employees have adequate time to rest, recharge, and maintain productivity.

Nights and Overtime

Employees working night shifts will be offered health assessments and support to manage their health.

Overtime will be voluntary and must be agreed upon by both the employee and management in advance.

Employees should not regularly work more 48 hours in any week, including overtime.

Health and Safety Considerations

Employees are encouraged to report any concerns regarding their working hours and workload to their line manager.

The company is committed to ensuring that employees are not subjected to excessive working hours that could impact their health and wellbeing.

Monitoring and Review

Management will regularly review working hours and patterns to ensure adherence to this policy and make adjustments as necessary.

Employees will be involved in the consultation process regarding any changes to working hours to ensure their needs and concerns are considered.

Responsibility

All employees are expected to comply with this policy, and management is responsible for monitoring adherence and addressing any violations appropriately.

Policy Review

This policy will be reviewed annually or as required by changes in legislation, workplace practices, or company circumstances.

Signed:

Dated:

4.14-QUALITY POLICY

MDN UK LTD aims to ensure that its products and services meet the needs of its customers at all times in accordance with contractual requirements, its policies and procedures.

Company Management is committed to:

- Develop and improve the Company's Quality standards
- Continually improve the effectiveness of the Company Quality Procedures
- The enhancement of customer satisfaction
- The following systems and procedures are in place to support us in our aim of customer satisfaction and continuous improvement throughout our business:
 - Regular gathering and monitoring of client and employee feedback
 - A customer complaints procedure
 - Selection and performance monitoring of suppliers against set criteria
 - Training and development for our employees
 - Regular audit of our internal processes
 - Measurable quality objectives which reflect our business aims
 - Management reviews of audit results, client feedback and complaints
 - Enhancing the skills of management and staff through review and actively pursuing an on-going training policy, the objective of which is to prepare staff to perform their work more effectively.
 - Ensure that all products used meet specifications and refer to standards as part of a sub-system, not just in isolation (BS, EN, UKCA...)
 - Ensure that the installation of construction products and systems are checked and approved by a competent person

The **MDN UK LTD** management has a continuing commitment to:

- Ensure that customer needs and expectations are determined and fulfilled with the aim of achieving customer satisfaction
 - All complaints and non-conformances are investigated by senior management to ascertain the source of the non-conformance and measures needed to prevent recurrence.
- Communicate throughout the Company the importance of meeting customer needs and all relevant statutory and regulatory requirements.
- Establish the Quality Procedures and objectives, and ensure they are brought to the attention of all employees.
- Ensure the availability of resources to meet the requirements of the Quality Procedures, i.e. training and funds.

In order to meet the Company commitment to quality, **MDN UK LTD** will:

- Ensure all employees are trained and competent in the tasks they undertake on behalf of the company and training records are held; training will be provided initially during induction and as required thereafter. Further training will be required should the scope of works undertaken by the Company change and/or following monitoring of the Quality Procedures for continual improvement.
- Ensure all employees understand the requirements of this Quality Policy and abide with the requirements of the Company Quality Procedures.
- Constantly monitor its quality performance, including on site performance during site visits, and implement improvements when appropriate.
- Regularly review this Quality Policy in order to ensure its continuing suitability.
- Provide information to individuals regarding monitoring of the Company Quality Procedures.
- Provide copies of this Quality Policy Statement to all employees.

Signed:

Dated:

4.15-MENTAL HEALTH AND WELLBEING POLICY

The purpose of this Mental Health and Wellbeing Policy is to promote mental health and wellbeing among employees/participants, to create a supportive environment, and to outline the organisation's commitment to addressing mental health issues.

- Scope

This policy applies to all employees/participants, management, and stakeholders within the organisation.

- Policy Statement

Our organisation acknowledges the importance of mental health and wellbeing. We are committed to creating a work/living environment that supports mental health, reduces stigma, and provides appropriate resources for those in need

- Objectives

To promote mental health awareness and educate employees/participants about mental health issues.

To create a positive work/living environment that supports mental health.

To provide resources and support for individuals experiencing mental health challenges.

To ensure that employees/participants feel safe and supported when discussing mental health issues.

To implement strategies for preventing work-related stress and mental health problems.

- Responsibilities

Management: To promote a culture of openness regarding mental health and to ensure that appropriate resources and support are provided.

Employees/Participants: To support one another and adhere to the guidelines set forth in this policy.

Employees should seek help if they are facing mental health challenges.

Human Resources: To provide training, resources, and support for mental health initiatives and respond appropriately to concerns.

- Mental Health Awareness and Training

Regular training sessions on mental health awareness to help employees/participants understand the importance of mental wellbeing and reduce stigma.

Workshops focusing on stress management, resilience, and coping strategies.

- Support Services

Access to mental health resources such as Employee Assistance Programs (EAP), counselling, and mental health hotlines.

Designated mental health first-aiders within the organisation who can provide immediate support.

- Confidentiality and Privacy

All discussions regarding mental health issues will be handled with strict confidentiality.

Employees/participants should feel safe discussing their concerns without fear of judgment or repercussions.

- Prevention Strategies

Regular assessments to identify workplace stressors and mental health risks.

Initiatives to encourage work-life balance, such as flexible working hours, remote work options, and mental health days.

- Reporting and Feedback Mechanism

A clear and accessible reporting system for employees/participants to raise concerns regarding mental health.

Regular feedback will be collected from employees/participants to continuously improve mental health initiatives.

- Evaluation and Review

The effectiveness of this policy will be reviewed annually, and necessary adjustments will be made based on feedback and changing needs.

- Communication

This policy will be communicated to all employees/participants and made accessible through the organisation's internal channels.

Signed:

Dated:

4.16-SOCIAL MEDIA POLICY

The purpose of the social media policy is to provide guidelines for appropriate use of social media platforms in a manner that reflects the organisation's values and protects its reputation.

Key Points:

Personal vs. Professional Use:

- Employees should clearly separate personal social media accounts from professional ones.
- Employees should not represent the organisation on personal accounts unless authorized.

Confidentiality:

- Do not share confidential or proprietary information related to the organisation, clients, or coworkers.

Respect and Professionalism:

- Avoid posting comments that could be considered offensive, derogatory, or inappropriate.
- Be respectful of colleagues and the organisation in all online interactions.

Monitoring:

- The organisation reserves the right to monitor social media use to ensure compliance with this policy.

Crisis Communication:

- Direct any media inquiries to designated spokespeople or the communications department.

Signed:

Dated:

4.17-USE OF INFORMATION TECHNOLOGY SYSTEMS POLICY

Use of information and communication technologies

To set standards for the acceptable use of information and communication technologies to protect the organisation's digital assets and ensure responsible use.

Key Points:

Acceptable Use:

- Employees must use systems for work-related purposes and adhere to all relevant laws and regulations.

Data Security:

- Employees are responsible for safeguarding sensitive information and should report any data breaches immediately.

Internet and Email Use:

- Personal use of the internet and email should be limited and compliant with organisational standards.

Software and Hardware:

- Unauthorised software installations or use of personal devices for work-related tasks without permission are prohibited.

Monitoring and Enforcement:

- The organisation may monitor system usage to ensure compliance and prevent misuse.

Signed:

Dated:

4.18-HARASSMENT, BULLYING AND VIOLENCE POLICY

MDN UK LTD is committed to a workplace free of violence, discrimination and harassment based on sexuality, race, gender, religion, age, ancestry, national origin, disability, status as a veteran, or any protected status. Violence, offensive or harassing behaviour will not be tolerated against any employee because of his or her protected status or the protected status of his or her relatives, friends, or associates.

This policy covers employees, customers, or members of the public. Any employee who engages in violence and / or harassment will be subject to disciplinary action up to and including termination. Supervisory and other management staff are responsible for taking prompt action to end violence / harassment in the workplace. Any supervisor or manager who has knowledge of such behaviour yet takes no action to end it will be subject to disciplinary action up to and including termination. **MDN UK LTD** strictly prohibits any harassing behaviour, such as:

- Unwelcome sexual advances, requests for sexual favours, and all other verbal or physical conduct of asexual nature.
- Making or threatening reprisals for refusing sexual favours.
- Repeated requests for dates or questions about one's sex life or experiences.
- Unwelcome physical contact such as pinching, kissing, inappropriately touching another employee, or impeding another employee's normal work movement.
- Slurs, jokes, posters, cartoons, pictures, offensive gestures, derogatory remarks, negative stereotyping, or offensive sounds that are based upon any protected status or directed toward an employee because of his or her protected status.
- Acts of physical violence, threats of physical violence, or other physically intimidating behaviour

- directed toward an employee because of his or her protected status.
- Continuous discriminatory activities, engaged in because of an employee have protected statuses, which are not explicitly sexual (or racial, ageist, etc.) (e.g., unequal distribution of work, lack of assistance when such assistance is provided to those outside the protected status, hiding work tools or equipment, etc.).
- Making unwelcome slurs about an individuals mental health state

Any such offensive conduct will be considered a prohibited form of harassment when either of the following is true:

- There is a promise or implied promise of preferential treatment or negative consequence regarding employment decisions or status.
- Such conduct has, or could have, the effect of creating an intimidating, hostile, or offensive work environment, or it unreasonably interferes with a person's work performance.
- Any employee who believes that he or she has either witnessed or been subjected to harassment shall immediately report the harassment to his or her supervisor. If the supervisor is unavailable or is the offending party, or the employee is uncomfortable in reporting the harassment to the supervisor, or the employee feels that the supervisor has not handled the matter to his or her satisfaction, the employee should report the harassing conduct to the Managing Director.

All reports of harassment shall be investigated as soon as possible. There shall be no exceptions to this rule. To the extent feasible, the investigation will be conducted in a confidential manner in order to protect all parties involved. We will notify all persons involved in the investigation that it is confidential and that unauthorised disclosures of information concerning the investigation could result in disciplinary action, up to and including termination of employment.

Any victim of violence / harassment will be offered counselling, and if necessary, legal guidance and time off work.

This company prohibits any type of retaliatory action for filing a harassment complaint. However, if it is determined after investigation that the complaint was made up of false charges or that an employee has provided false information, disciplinary action will be taken against the employee who filed the complaint or provided the false information.

Signed:

Dated:

4.19-SMOKING POLICY

This Smoking Policy is designed to provide a safe and healthy working environment for all employees, clients, and visitors in accordance with the Health Act 2006 and other relevant legislation. The policy outlines our commitment to maintaining a smoke-free workplace and the guidelines for smoking on our premises.

Scope: This policy applies to all employees, contractors, clients, and visitors of **MDN UK LTD** at all locations.

Policy Statement: **MDN UK LTD** is committed to promoting the health and wellbeing of its employees and visitors. As such, smoking is prohibited inside all buildings and enclosed spaces owned or operated by the company. This includes, but is not limited to, offices, meeting rooms, restrooms, break rooms, and any other indoor areas.

Details of the Policy:

No Smoking Inside Buildings:

Smoking is strictly prohibited inside all company buildings and vehicles.

This includes all enclosed and semi-enclosed spaces, regardless of the presence of ventilation.

Designated Smoking Areas:

Designated smoking areas will be provided outside company buildings, clearly marked and separated

from entrances, windows, and ventilation systems.

Employees are expected to use these designated areas when smoking.

Respect for Others:

Employees who smoke are expected to be considerate of non-smokers.

Smoking breaks should not interfere with work responsibilities or the comfort of others.

Signage:

No smoking signs will be prominently displayed at all entrances to buildings and in designated smoking areas to remind everyone of the policy.

Employee Support:

MDN UK LTD recognises that quitting smoking can be challenging. We encourage employees who wish to quit smoking to seek support from available resources, including smoking cessation programs and counselling services.

Compliance:

All employees and visitors are expected to comply with this policy. Failure to adhere to the smoking policy may result in disciplinary action as per the company's disciplinary procedures.

Monitoring and Review:

The policy will be reviewed annually or as needed to ensure its effectiveness and compliance with any changes in legislation or company practices.

Communication:

This policy will be communicated to all employees upon hiring and will be readily accessible in employee handbooks.

Signed:

Dated:

4.20-PRIVACY POLICY

1. Introduction

Welcome to **MDN UK LTD**. We are committed to protecting your privacy and ensuring that your personal information is handled responsibly. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website or engage with our services.

2. Information We Collect

We may collect the following types of information:

- **Personal Information:** This includes your name, email address, phone number, mailing address, and any other information you provide to us when you contact us or use our services.
- **Non-Personal Information:** This includes data that does not identify you personally, such as your IP address, browser type, operating system, and usage information that we collect through cookies and similar technologies.

3. How We Use Your Information

We may use your information for the following purposes:

- To provide, operate, and maintain our services.
- To improve, personalize, and expand our services.
- To communicate with you, including responding to your inquiries and providing customer support.
- To process transactions and send you related information, including purchase confirmations and invoices.
- To detect, prevent, and address technical issues.

4. Sharing Your Information

We do not sell or rent your personal information to third parties. However, we may share your information in the following circumstances:

With Service Providers: We may share your information with third-party vendors, service providers, contractors, or agents who perform services on our behalf.

For Legal Reasons: We may disclose your information if required to do so by law or in response to valid requests by public authorities.

5. Data Security

We take reasonable steps to protect your personal information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. However, no method of transmission over the internet or method of electronic storage is 100% secure, and we cannot guarantee its absolute security.

6. Your Rights

Depending on your location, you may have the following rights regarding your personal information:

- The right to access: You can request copies of your personal data.
- The right to rectification: You can ask us to correct any information you believe is inaccurate or incomplete.
- The right to erasure: You can request that we erase your personal data, under certain conditions.
- The right to restrict processing: You can request that we restrict the processing of your personal data, under certain conditions.
- The right to data portability: You can request that we transfer your data to another organisation, or directly to you, under certain conditions.

7. Third-Party Websites

Our website may contain links to third-party websites that are not operated by us. We recommend that you review the privacy policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

8. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page with a new effective date. You are advised to review this Privacy Policy periodically for any changes.

9. Contact Us

If you have any questions about this Privacy Policy, please contact us:

Signed:

Dated:

4.21-CYBER SECURITY POLICY

Purpose The purpose of this Cybersecurity Policy is to establish guidelines and procedures for protecting the organization's information assets from unauthorized access, disclosure, alteration, and destruction.

Scope This policy applies to all employees, contractors, and third-party service providers who access the organization's information systems and data.

Policy Statement The organization is committed to maintaining the confidentiality, integrity, and availability of its information systems and data. All employees are required to adhere to the following policies and procedures.

Access Control

- Access to information systems and data shall be granted on a need-to-know basis.
- User accounts must be unique and not shared.
- Multi-factor authentication (MFA) is required for accessing sensitive systems.
- Access rights shall be reviewed bi-annually.

Data Protection

- Sensitive data must be encrypted both at rest and in transit.
- All data must be backed up regularly, with backups stored securely and accessible for restoration.
- Personal identifiable information (PII) must be collected, processed, and stored in compliance with applicable laws and regulations.

Incident Response

- Employees must report any suspected security incidents immediately to the IT security team via the established reporting mechanism.
- An incident response plan must be in place to manage and mitigate security incidents effectively.
- Post-incident reviews must be conducted to identify lessons learned and improve future responses.

Security Awareness Training

- All employees are required to complete cybersecurity awareness training annually.
- Training will cover topics such as phishing attacks, social engineering, password management, and safe internet practices.

Acceptable Use

- Employees must use organizational resources for legitimate business purposes only.
- Unauthorized use of organizational resources for personal gain or illegal activities is strictly prohibited.
- Use of personal devices for accessing organizational data must comply with the Bring Your Own Device (BYOD) policy.

Monitoring and Logging

- The organization reserves the right to monitor and log all network and system activities to detect and respond to security incidents.
- Logs must be retained for a minimum of one year and reviewed regularly for suspicious activities.

Policy Compliance

- Non-compliance with this policy may result in disciplinary action, up to and including termination of employment.
- The policy will be reviewed annually and updated as necessary to ensure its relevance and effectiveness.

Responsibilities

- The IT Security Team is responsible for implementing and enforcing this policy.
- All employees are responsible for adhering to this policy and reporting any vulnerabilities or incidents.
- Review and Revision This policy will be reviewed annually or as necessary due to changes in laws, regulations, or organizational needs.

Signed:

Dated:

4.22-CORPORATE SOCIAL RESPONSIBILITY POLICY

POLICY STATEMENT

At **MDN UK LTD**, the way we lead, work, and behave is driven by our core values. These values influence the way we meet client needs while respecting the regulatory requirements and the way we promote ethically sound practices within **MDN UK LTD**. **MDN UK LTD** is committed to integrating responsible and sustainable business practices across our operations. It is our policy to act responsibly in our day-to-day relationships with our customers, suppliers, employees, and communities. We have a long history of supporting the public that we serve. Protecting our shared environment is of fundamental importance to **MDN UK LTD**, as it is to our employees. These core principals are embedded in our business, processes, and ways of working. Our leadership in corporate responsibility and sustainable excellence is driven by a bold and influential approach that encompasses:

- high ethical standards when conducting business,
- acts in an environmentally conscientious and responsible manner,
- respects the privacy and dignity of our employees, suppliers, customers, and contractors,
- promotes a work environment of equal opportunity and never engages in unlawful discrimination,
- commits to employing a diverse work force,
- maintains a safe and healthy work environment.

This statement is about how **MDN UK LTD** takes account of its economic, social and environmental impact in the way we operate as a business. By demonstrating our commitment to Corporate Social Responsibility, we aim to align our business values, purpose and strategy with the needs of our clients, whilst embedding such responsible and ethical principles into everything we do.

The elements of this statement covers our approach in working with our clients, suppliers and the local community. These principles include established standards to ensure that working conditions are safe, that employees are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

Labour Practices

- **MDN UK LTD**, is committed to uphold the rights of our employees, and treat them with dignity and respect. This applies to all employees including temporary, student, contract, direct and any other type of worker. We have detailed processes and procedures in place to ensure we follow all national and local regulation and law Standards/Fair Wages
- Child labour is not used in any area. The term “child” refers to any person under the age of 15. The use of legitimate internship or student co-op programs, which comply with all laws and regulations, is supported. Workers under the age of 18 do not perform work that is likely to jeopardize the health or safety of young workers.
- Work weeks do not exceed the maximum set by the government.
- Compensation paid to employees is compliant with all applicable wage laws, including those related to minimum wages, overtime hours and legally mandated benefits.
- Employees are compensated for overtime at pay rates greater than regular hourly rates.
- Verification of employment eligibility is always performed per UK laws.
- Regular updates to **MDN UK LTD** Payroll Software occur to ensure current tax rules are being applied.
- Detailed checklists and procedures are used to verify information is processed and verified.
- Creation and maintenance of documents and records ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
- **MDN UK LTD** conducts a regular review of our processes related to wage and labour practices.
- Ongoing training, to our Human Resources, Payroll, and Recruiting staff on the latest changes to regulations.

Performance Management

- A key opportunity for **MDN UK LTD** to evaluate employees, measure progress, offer constructive feedback, and provide developmental plans and activities is through annual goal setting and performance reviews. **MDN UK LTD** has an ongoing and annual performance program focused on providing thorough, thoughtful, and candid feedback and goals to increase employee skill set and ability.
- We also make it a point to recognize top performance and productivity both through formal Awards programs and informal recognition.
- Benefits & Total Compensation
- We recognize that employee benefits participation is an important part of the employment relationship. Some of the benefits **MDN UK LTD** offers include:
- Ancillary benefits, such as time off with pay (Holiday, personal time, paid-time off bereavement pay), employee assistance program, employee discount programs.

HEALTH & SAFETY

MDN UK LTD recognizes that in addition to minimizing the incidence of work-related incidents and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production/performance and employee retention and morale. We also recognize that ongoing employee input and education is essential to identifying and solving health and safety issues in the workplace. Our policies address the following areas:

Occupational Safety

- It is the responsibility of each employee to conduct all tasks in a safe and efficient manner complying with all UK laws and customer safety and health regulations, programmatic.
- **MDN UK LTD** provides new hire and ongoing safety training to address General Safety Rules (including NVQ, Product training, safety training, hazardous materials, personal protective equipment, etc.), First Aid, Fire, Procedures, Tools, and Chemicals, or any other training required by our customers.
- We also provide training aimed to reduce workplace injury on Lifting and Moving, Proper Lifting Techniques, Stretching, Keyboard Posture, and Proper Sitting
- Employee exposure to potential safety hazards are controlled through proper design, engineering and administrative controls, preventative maintenance, safe work procedures, and employees complying with all **MDN UK LTD**, HSE and client-specific requirements.
- Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks are identified, evaluated, and controlled. Employees are required to follow all **MDN UK LTD** and client specific procedures while on-site.
- Worker exposure to chemical, biological and physical agents is identified, evaluated and controlled. Workers are required to follow **MDN UK LTD** and client specific requirements while on-site.
- Employees are encouraged to bring forth safety concerns and input to ensure a safe working environment. The use and misuse of drugs and alcohol pose a threat to **MDN UK LTD** and our clients. We enforce a stringent Drug-Free Workplace policy, but also provide avenues for help for those requesting support.

- Employees are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Emergency Preparedness

- Potential emergency situations and events are identified and assessed, and their impact minimized by implementing emergency plans and response procedures at **MDN UK LTD** and on-site at client locations. Employees are required to follow client rules for emergencies at client sites.
- Emergency plans and procedures include emergency reporting, employee notification and evacuation procedures, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

Occupational Injury and Illness

- Procedures and systems are in place for **MDN UK LTD** offices and every client location to prevent, manage, track and report occupational injury and illness including provisions to: encourage employee reporting; classify and record injury and illness cases; provide necessary treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate the return of employees to work.

Fair Operating Practices

- **MDN UK LTD** also has internal requirements to utilize a diverse supply chain.
- Our Supplier Diversity Program ensures that diverse suppliers have the ability to compete in the procurement process and to do business with **MDN UK LTD**. In addition, we ensure that the social, environmental and ethical commitments of **MDN UK LTD** are reflected in working with all customers and suppliers.

Business Integrity

- **MDN UK LTD** ensures that we deal responsibly, openly and fairly with clients and potential customers. **MDN UK LTD** upholds the highest standards of ethics including:
- The highest standards of business integrity are upheld in all business interactions. We have a zero-tolerance policy to ensure prohibition of any and all forms of bribery, corruption, extortion and embezzlement.
- All business dealings are required to be transparently performed and accurately reflected on business books and records.
- Bribes or other means of obtaining undue or improper advantage are not offered or accepted.
- If an error occurs, we will acknowledge it and put corrective procedures in place to address the root cause and minimize the likelihood of the problem repeating.
- Information regarding business activities, structure, financial situation and performance is disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices are unacceptable.
- Intellectual property rights are respected; transfer of technology and know-how is done in a manner that protects these rights.
- Programmes that ensure the confidentiality and protection of client and employee whistle-blower rights are maintained.
- **MDN UK LTD** is committed to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, clients, consumers and employees. **MDN UK LTD** complies with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
- **MDN UK LTD** actively solicits and uses client feedback for continuous improvement.
- **MDN UK LTD** ensures we benchmark and evaluate our procedures and practices in order to constantly improve our competitiveness in the marketplace.

Suppliers

We expect our suppliers to:

- Put in place sufficient systems to monitor and take responsibility for compliance with social policies
- Conduct regular assessments of their operations to identify eventual non-compliance cases
- Develop remediation plans to resolve non-compliance cases
- Regularly monitor the effective implementation of remediation plans

HUMAN RIGHTS

MDN UK LTD strives to foster safe, respectful, and inclusive workplaces. As a service-disabled minority and veteran owned company, **MDN UK LTD** takes tremendous pride in our culture and diversity. **MDN UK LTD**'s culture is committed to respect, integrity, service and excellence. This commitment applies to all of our employees and spans our efforts to develop a diverse workforce, maintain safe and secure workplaces, and support the health, wellness and career development of our employee base. We define these values to hiring; workplace behaviour; and employee conduct toward each other, our clients, and our business partners.

Humane Treatment

- There is zero tolerance for harsh or inhumane treatment including sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to employees.

Harassment Prevention and Non-Discrimination

- Unlawful harassment, in any form and regardless of intent, is a form of discrimination and interferes with our commitment to equal employment opportunity. **MDN UK LTD** does not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, or any other category protected by law. Harassment and/or discrimination contradict our values and have no place at **MDN UK LTD**. Our Employee Handbook clearly addresses our policies and disciplinary action regarding harassment.

The Policy

- Defines harassment (including sexual) and provides examples of prohibited activities.
- Describes our expectations of all employees, including complaint procedures, and the special responsibilities of managers.
- Uses the recommendations of experts and follows the best practices of top companies relative to integrity standards.
- If allegations of harassment or discrimination occur, our Human Resources team (with Senior Management and/or legal counsel if necessary) acts swiftly to uncover and evaluate facts, take remedial action if warranted, and eliminate root causes of the problematic behaviour.
- Our company benefits from a very diverse workforce starting with the board of directors, leadership team and the company itself has over 30% minority and 40% female populations.

Open Communication & Freedom of Association

- Open communication and direct engagement between employees and management are the most effective ways to resolve workplace and compensation issues. Our company has an open-door policy that allows employees to communicate discreetly and openly with all levels of management.
- We expect and encourage employees throughout our business operations to make **MDN UK LTD** principles and practices a part of their everyday work, and hold our employees accountable for adhering to our Conduct and Work Rules Policy in our Employee Handbook
- We keep our policies and practices relating to human rights under continuous and vigorous review, recognizing the need to stay vigilant in a rapidly changing and challenging world.

Environment Issues

Protection of the environment in which we live and operate is part of **MDN UK LTD**'s values and principles and we consider it to be sound business practice. Care for the environment is one of our key responsibilities and an important part of the way in which we do business. We strive to reduce our energy use, manage our carbon footprint and decrease our overall environmental impact.

MDN UK LTD commit to:

- Comply with all relevant environmental legislation, regulations and approved codes of practice
- Protect the environment by striving to prevent and minimize our contribution to pollution of land, air, and water
- Seek to keep waste to a minimum and maximize the efficient use of materials and resources
- Manage and dispose of all waste in a responsible manner
- Provide training for our staff so that we all work in accordance with this policy statement and within an environmentally aware culture
- Regularly communicate our environmental performance to our employees and other significant stakeholders
- Develop our management processes to ensure that environmental factors are considered during planning and implementation
- Monitor and continuously improve our environmental performance.
- We strive to ensure that **MDN UK LTD** reduces its environmental impact by:
- Reducing our transportation requirements wherever possible by utilizing MS Teams and conference calls
- Efficient use of energy. Ensuring that all lights and equipment are switched off when not required including end of day checklists to ensure we are conserving energy wherever possible.
- Use of motion sensor lights.
- Ensuring that water is used efficiently onsite
- Optimizing efficiency for all printing, copying, and mailing functions including printing in mono and double sided wherever possible
- Participating in recycling programs including paper shredding, bottles/cans, and toner cartridges.
- Sourcing recycled materials wherever possible including toner cartridges and paper
- Using scrap paper for drafts and notes

- Encourage electronic marketing materials whenever possible
- Working with like-minded suppliers who take steps to minimize their environmental impact

Consumer Issues (Our Customers)

MDN UK LTD recognizes the importance of understanding the needs and expectations of our customers. We want to ensure that the client's expectations are met and exceeded. Our process for monitoring client satisfaction encompasses regular and frequent communication with the client. The following are some of the methods utilized by **MDN UK LTD**:

- Regularly schedule meetings with client including weekly and quarterly meetings with key topics addressed including client satisfaction, SLAs, scorecards, future initiatives, etc.
- Satisfaction survey. Data collected from this process is used in several ways. Any dissatisfaction issues require an investigation and a corrective action. In addition, all issues are tracked on a global basis to ascertain any trends and to effect systemic change if needed.
- **MDN UK LTD** takes client feedback and complaints seriously and encourages open communication to obtain "the voice of the customer". Processes and systems are put in place to minimize process failures and associated complaints. When a complaint occurs, it is addressed immediately. By protocol, the next level of management is made aware of the complaint and can help effect resolution and implement needed corrective actions in a prompt manner. All complaints are logged to help capture trends and identify solutions. After the issue has been addressed, the customer is notified and follow up feedback is obtained from customer to ensure issue was satisfactorily resolved.
- Every complaint is viewed as a defect at **MDN UK LTD** and steps are taken to immediately resolve the issue. In addition, corrective action is put in place to prevent reoccurrences of the issue.
- For process failures, **MDN UK LTD** uses the DMAIC process to resolve problems and identify potential trends.

Summary

The operations and ultimate responsibility for the commitment to our corporate social and environmental sustainability principles lies with every employee of **MDN UK LTD**.

The effectiveness of the Policy Statement will be monitored and reviewed at least annually by the Managing Director to ensure the Company's continuing compliance with any relevant legislation and to meet new business requirements and to identify areas in need of improvement. We will also ensure that all changes will be brought to the attention of employees as necessary.

Signed:



Dated: 09/06/2025