

RECONOMY GROUP

HEALTH, SAFETY & WELFARE POLICY

Approved by: Guy Wakeley CEO
Date reviewed: 26th July 2023

Reconomy
Group



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1. POLICY STATEMENT

The Reconomy Group is committed to the safety and well-being of everyone involved in our business; whether you work directly for the Group, or are a visitor or contractor, your safety is our top priority.

Health and safety in our organisation starts from the top down and we encourage open communication when it comes to matters of safety. We encourage employees to speak up when they observe actions that have or could lead to harm, and they have a suggestion to make us safer. Our managers listen and are fully committed to improving our systems and processes and making our working environment safer for everyone.

The Reconomy Group commits to maintaining a hazard free workplace and to upholding a culture of improvement, by always looking out for new hazards and controls, and setting objectives and targets to keep us from harm.

Reconomy Group will ensure adequate resources, both financial and operational, are available to implement and improve health and safety requirements and that all employees are provided with the necessary instruction, information, training, and supervision so that they can carry out their work without risk to themselves or others.

Each business within the Reconomy Group has its own risk profile and therefore its own health and safety management system. Health and safety forums are promoted across the Reconomy Group, key strategic and operational health and safety risks are quantified, controls identified, as well as their effectiveness and improvement potential assessed.

To create a safe working environment, we will;

- comply with all statutory requirements and codes of conduct;
- consult with and listen to our employees on matters affecting their health and safety;
- provide and maintain a safe working environment and equipment;
- provide information, instruction and supervision for employees;
- ensure all employees are competent to do their tasks, and give them adequate training;
- prevent accidents and cases of work-related ill health;
- encourage continuous improvement by setting and achieving targets and objectives to be safer;
- benchmark safety against industry best practise;
- review and revise this policy as necessary at regular intervals.

It is our ambition to make the Reconomy Group a great – and safe - place to work.

Signature:



Name of Signatory: Guy Wakeley

Position: Chief Executive Officer

Date: 26th July 2023

2. ROLES & RESPONSIBILITY

CEO: Overall responsibility for health, safety and welfare in Reconomy Group (the 'Company').

Board and Managers: Reconomy Group's Health, Safety and Welfare Policy is adopted by the Board of Directors; its managers are responsible for its implementation. Management is accountable for preventing workplace incidents, injuries and illnesses, and will consider all employee suggestions for achieving a safer, healthier workplace.

Employees: All employees have a personal responsibility for their own and their colleague's health and safety. All employees are expected to and encouraged to participate in health and safety programme activities and initiatives, including reporting hazards, unsafe work practices and accidents immediately to their manager or safety committee representative and wearing required personal protective equipment.

Health and Safety Owners: Ensuring health and safety standards are maintained and improved on each site is the responsibility of the Health and Safety Owners detailed in [Appendix 1](#) of this Policy. The Health and Safety Owner on each site is responsible for the duties listed in [Appendix 2](#).

First Aiders: Attending First Aiders are responsible for completing the required information in the accident book for each first aid incident dealt with.

Fire Wardens: Designated Fire Wardens are responsible for assessing fire risks and hazards, taking appropriate action in the event of a fire when safe to do so, and enabling a safe and efficient evacuation.

No person shall intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety and welfare.

If any employee in the Company feels at any point that they are unsafe in the workplace, or they have a health and safety concern, this must be reported to the designated Health and Safety Owner on site.

3. CONSULTATION

Reconomy Group employees influence health and safety through their own actions. Our employees are the best people to understand the risks in their workplace, and for this reason talking, listening and cooperating with each other is vital to identify solutions to problems, to develop a positive health and safety culture and to bring about improvements. Employees raise concerns and offer solutions.

Reconomy Group will consult with employees through health and safety forums, unions and committees.

4. TRAINING

All employees shall receive suitable and sufficient safety instruction to enable them to understand the full implication of their actions and perform their duties in a safe manner. All employees will have completed the required level of training as described in [Appendix 3](#).

Roles and responsibilities will be communicated during employee induction, and in the event of a change of role.

5. RISK ASSESSMENTS & SSOW

Businesses within Reconomy Group have varying risk profiles and regularly assess their own health and safety risks. A range of risks are assessed, including mechanical machinery hazards in our sorting facilities, lifting and handling in warehousing and storage facilities, the use of flammable substances and risks associated with driving and road transport. All activities carried out in the name of Reconomy Group shall be assessed to determine the risk to health and safety and the measures necessary, such as training, to minimise risks of injury or ill health to people.

Records of assessments will be kept and maintained by the designated Health and Safety Owners.

6. CONTRACTORS & SUPPLIERS

High standards of health and safety are expected from all contractors and suppliers working on behalf of the Reconomy Group. All contractors and suppliers will have a Health and Safety Policy in place and will have signed up to a Health and Safety Code of Practice.

7. ACCIDENT REPORTING

Accidents are preventable but only if we understand how and why they happen.

We promote a culture of reporting accidents, incidents, unsafe acts and conditions. All accidents, including minor accidents and near misses and incidents, including damage to property, shall be reported, investigated and corrective action taken where necessary to improve safety and prevent similar future events.

Reconomy Group strives to have the best safety record, it is therefore important that we have a strong and structured approach to reporting, investigating and learning from accidents.

All such accidents to employees and other persons must be reported strictly in accordance with the accident reporting procedures defined in [Appendix 4](#).

8. SAFETY EQUIPMENT

We will assess risks to decide if safety equipment is required. We will provide the right and proper safety equipment and personal protective equipment (PPE) to protect our employees.

9. FIRE PRECAUTIONS

We will carry out fire safety risk assessments and ensure that adequate and appropriate fire safety measures are in place to minimise the risk of injury or loss of life in the event of a fire. We will provide the necessary firefighting equipment and training of employees in accordance with legal requirements and sound fire prevention practice.

10. INSURANCE

In recognition of its statutory and common law duties, Reconomy Group has taken out insurance, with an approved insurer, against liability for a work-related injury or illness suffered by any of its employees and arising out of and in the course of employment provided only that it is caused by negligence and/or breach of statutory duty on the part of the Reconomy Group. The insurance certificate will be prominently displayed so as to be available for inspection at all reasonable times by employees.

11. HEALTH & SAFETY COMMITTEE

The CEO holds the Health and Safety Committee accountable in the discharge of his health and safety responsibilities, as outlined in the [Reconomy Group Health and Safety Committee: Terms of Reference](#).

The Committee will meet on a quarterly basis and review health and safety performance across the recycle, comply and reuse divisions.

The Committee will do everything possible to maintain a safe and healthy working environment which complies with statutory requirements, complemented by an ongoing programme of health and safety improvement initiatives.

Whilst each Reconomy Group business has formed its own Health and Safety Committee to ensure workplace safety, the Group Health and Safety Committee will provide a forum to discuss their output, areas of concern and the progress of improvement initiatives.

12. POLICY REVIEW

Reconomy Group's Health, Safety and Welfare Policy has been prepared in furtherance to specific safety legislation and binds all directors, managers, supervisors and employees. The policy will be reviewed annually.

In the interest of employees and customers, Reconomy Group requests that our customers, visitors and contractors respect this Policy.

A copy of this policy is available to be viewed on request.

APPENDIX 1

Health and Safety Owners

Division	Brand	H&S Owner	Role	Risk
Recycle	Casepak & Oceala	Elizabeth Mott * Matt Spurling	Head of Health & Safety and Compliance Health and Safety Officer	H
	Eurokey - Kettering	Simon Smith	H&S Manager	H
		Lewis Goddard	Operations Manager	
	Eurokey - Leicester	Ben McClelland	Operations Manager	L
	ACM	Craig Goddard	Technical and Health and Safety	M
	Reconomy UK	Eliza Chanin	Compliance Manager	L
	NWS	Jane Phang	HR and Compliance	L
	AWS	Alex Plowman	Compliance	L
	Waste Source	Chris Holland	Managing Director	L
	Combineering	Sanne Rønnebech	HR Business Partner	L
	Novati	Chris Bennett	SHEQ Manager	L
Webb's Training	Mike Williamson	General Manager	L	
Comply	Noventiz	Jochen Siegburg	Operations (Health and Safety Representative)	L
	Valpak	Lisa Regan	Director of HR	L
	RLG	Giovanna Lanzarone	(HQ and Dornach office)	L
Reuse	ASCG	Kevin Siddle	H&S Manager	H
	ReBOUND UK	Karen Moir	HR Administrator	L
	ReBOUND NL	Ana Teixeira	Office Manager	L

* Lead Health and Safety Officer for recycle division, coordinating and overseeing all health and safety activity across both processing and outsourcing businesses with local support.

APPENDIX 2

Health and Safety Owners: Responsibilities

Responsibilities of the Health and Safety Owner include, but are not limited to:

- Ensuring health and safety policies and procedures are documented, reviewed and communicated to employees and relevant third parties;
- Listening to employees, in order to identify and manage health and safety risks on and off site;
- Providing adequate welfare, fire safety and first aid facilities for employees and where applicable, the requirements of contractors;
- Informing employees of the welfare facilities on site;
- Ensuring appropriate PPE requirements are met and registers are maintained;
- Ensuring First Aiders and Fire Wardens are trained and certificated as appropriate, in line with legal requirements;
- Managing and monitoring their business's health and safety training matrix and ensuring all relevant health and safety training is completed;
- Determining which employees require Personal Emergency Evacuation Plans and ensure these are shared with all relevant individuals;
- Maintaining appropriate first aid cover at all times;
- Tracking maintenance of the building, work machinery and other equipment within their business;
- Providing sufficient first aid equipment to ensure compliance with regulations and the site specific risk assessment;
- Monitoring, reporting and reviewing performance in relation to health and safety;
- Ensuring continuing competence through ongoing professional development.
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APPENDIX 3

Training Courses

Role	Level of training / Qualification
Reconomy Group company Directors and MDs of Medium & High risk sites as indicated in Appendix 1 .	IOSH Leading Safely
Health and Safety Owners (with health and safety as a specific role, e.g., Health and Safety Manager/Officer) at Medium & High risk sites as indicated in Appendix 1 .	NEBOSH General Certificate in Occupational Health and Safety or NVQ in Occupational Health and Safety Practice (level to be determined) Member of IOSH and to complete CPD (continuing professional development) to demonstrate up to date competence.
Health and Safety Owners at Low risk sites as indicated in Appendix 1 . Managers/supervisors/team leaders at Medium & High risk sites as indicated in Appendix 1 .	IOSH Managing Safely
Supervisors/team leaders/departmental managers	General managers awareness training
All other employees	General awareness training

All training to be renewed every 3 years unless otherwise agreed.

APPENDIX 4

Accident Reporting Procedure

All injuries to employees, contractors or visitors shall be investigated and recorded on the relevant site specific forms.

In the event of a fatal accident, major injury or dangerous occurrence, this must be immediately reported by telephone and email to the Group CEO and the Chief Financial Officer. The Group CEO is responsible for contacting the relevant enforcement authority.

The Chief Financial Officer will ensure that any enforcement authority documentation is completed and forwarded to the authorities as required.

The Health and Safety Owner must ensure that accident details and attendance for first aid are recorded in the site accident book and the incident is fully investigated. Records of injuries resulting from accidents at work will be analysed and improvement objectives/projects put in place.

Accident and incident statistics shall be provided monthly to the Compliance Manager for inclusion in the Reconomy Group board papers. This will include the following data:

- no. of fatal accidents;
- no. of reportable specified injuries;
- no. of reportable occupational diseases;
- no. of reportable dangerous occurrences (RIDDOR);
- no. of reportable (i.e., > 7 day) lost time injuries (RIDDOR);
- no. of recordable (4-7 days) lost time injuries;
- no. of lost time incident cases between 1 & 3 days;
- no. of medical treatment cases;
- no. of first aid treatments;
- total days lost as a result of workplace incidents;
- near misses;
- no. of instances of enforcement action by the HSE;
- average no of employees/contractors;
- total hours worked (employees & contractors);

A short summary of all recorded incidents shall be provided in this report for the attention of the Group Chief Executive Officer.