

HEALTH & SAFETY POLICY

General Statement of Intent It is the policy of FMS Foils Group Limited to comply with the Health and Safety at Work etc. Act 1974 and all other relevant overarching and specific health and safety legislation. We are committed to ensuring, so far as is reasonably practicable, the health, safety, and welfare of all our employees, visitors, and contractors.

1. Safety Personnel

A Management line chart, appendix 1 shows key personnel involved in Managing Safety. The person with overall and final responsibility for health and safety in FMS Foils Group Limited is the Managing Director, Dima Koshel. The person responsible for overseeing, implementing and monitoring the policy is the Head of Operations, Paul Barnes. The following personnel will be responsible for the supervision of Health and Safety as shown below:

- Health and Safety Coordinator: Tamas Raffay
- Union Safety Rep: Gary Moss
- Duty Safety Supervisor: Supervisors on rotation

2. Consultation

The management of FMS Foils Group Limited see communication between workers at all levels as an essential part of effective health and safety management. Consultation will be facilitated by means of Safety Committee meetings as often as is deemed necessary and generally once every month. The purpose of Safety Committee meetings is to provide a forum in which information may be conveyed and employees' questions on health and safety issues answered. In addition, these meetings will provide an opportunity to assess the continuing effectiveness of the policy and review the monthly safety team report on workplace inspections – see para 6.

3. Communication

The management of FMS Foils Group Limited will endeavour to communicate to employees their commitment to safety and to ensure that employees are familiar with the contents of the company health and safety policy. FMS Foils Group Limited communicates with its employees orally, in the form of directions and statements from supervisors, in writing, in the form of directives and this policy statement, and by example. Safety meeting minutes will be made available for all employees to read and comment on.

4. Co-operation & Care

If we are to build and maintain a healthy and safe working environment, co-operation between workers at all levels is essential. All employees are expected to co-operate with safety officers and to accept their duties under this policy. Disciplinary action may be taken against any employee who violates safety rules or who fails to perform his or her duties under this policy. Employees have a duty to take all reasonable steps to preserve and protect the health and safety of themselves and all other people affected by the operations of the company.

5. Safety Training

Safety training is regarded as an indispensable ingredient of an effective health and safety programme. It is essential that every worker in the organisation be trained to perform his or her job effectively and safely. It is the opinion of the management of FMS Foils Group Limited that if a job is not done safely then it is not done effectively. All workers will be trained in safe working practices and procedures prior to being allowed to operate, unsupervised, any process or machine new to them. An important aspect of this is learning from a fully trained operator, under the guidance of the section supervisor and the completion of the Training Record & Operator Skill Level sheets to be filed with the Head of Operations. Training will include advice on the use and maintenance of personal protective equipment appropriate to the task concerned and the formulation of emergency contingency plans. Training sessions will be arranged as often as is deemed necessary and will provide another opportunity for workers to express any fears or concerns they might have about their jobs. The personnel with the responsibility for co-ordinating safety training are detailed below:

- Head of Operations: Paul Barnes
- Supervisors: Ashley Perry / P. Dorrell / K. Burgess / D. Thurley / R. Wotton / A. Cobaj / B. Chisholm

6. Workplace Inspections

It is the policy of FMS Foils Group Limited to comply with the Workplace (Health, Safety & Welfare) Regulations 1992. A member of the safety team will conduct regular inspections of the workplace. In addition, inspections will be conducted in the relevant areas whenever there are significant changes in the nature and/or scale of our operations. Workplace inspections will also provide an opportunity to review the continuing effectiveness of the policy and to identify areas where revision of the policy may be necessary. Safety Team Members:

- Paul Barnes (Head of Operations)
- Tamas Raffay (Health and Safety Coordinator)
- Gary Moss (Union Safety Rep)

- Other Supervisors/Staff/Managers as necessary

7. Work Equipment

It is the policy of FMS Foils Group Limited to comply with the law as set out in the Provision and Use of Work Equipment Regulations 1998. FMS Foils Group Limited will endeavour to maintain plant and systems of work that are safe, without risk to health and suitable for the purpose for intended. All workers will be provided with adequate information and training to enable them to use work equipment safely. The use of any work equipment, which could pose a risk to the wellbeing of persons in or around the workplace, will be restricted to authorised persons. All work equipment will be maintained in good working order and repair. Faulty machinery must be reported via supervision to management and engineering. The Head of Operations will raise safety issue notices where appropriate. All workers will be provided with such protection as is adequate to protect them from dangers occasioned using work equipment, which will be provided with guards, emergency stops, warning & protection devices as appropriate. A list of key guards and emergency stops is provided for each machine and to be checked off daily by the operator before starting. All work equipment will be clearly marked with health and safety warnings where appropriate. Risk assessments will be carried out on all activities, processes and equipment.

8. New or Expectant Mothers

It is the policy of FMS Foils Group Limited to comply with the European Directive on Pregnant Workers. In addition to the general risk assessment, a further assessment of risk to new or expectant mothers will be conducted. Where a risk to new or expectant mothers is identified, working conditions and / or working hours will be adjusted to avoid the risk. Where this is not reasonable the employee(s) concerned will be suspended from work on full pay. Where a new or expectant mother produces a doctor's certificate stating that she should not work at night, suitable alternative daytime work will be found. Where this is not possible, she will be suspended from work on full pay.

9. Fire Safety

FMS Foils Group Limited fire safety policy and procedures take account of special fire hazards in specific areas of the workplace and, where appropriate, have been compiled with the assistance of the local fire service. The person with responsibility for the maintenance and testing of fire alarms and firefighting equipment is the Engineering Manager. All workers within the firm have a duty to sound the alarm immediately in the event of any fire or smoke and immediately report potential fire hazards to management or engineering. Sounding the alarm will automatically summon the Fire Brigade through the call centre. All workers have a duty to conduct their operations in such a way as to minimise the risk of fire. This involves taking care to keep combustible materials

separate from sources of ignition and avoiding unnecessary accumulation of combustible materials, only smoking in the designated area and enforcing the no smoking rules for visitors, contractors and drivers. The Health and Safety Coordinator is responsible for the provision and maintenance of fire prevention and detection equipment. Supervisors are responsible for keeping their operating areas safe from fire, ensuring that their staff are trained in proper fire prevention practices and emergency procedures. The Health and Safety Coordinator is responsible for providing overall site Fire Risk Assessments, in accordance with the Regulatory Reform (Fire Safety) Order 2005.

Fire Detection Equipment Smoke detectors and/or manually operated fire alarms are located at strategic points throughout the workplace. If a smoke detector is activated the fire alarm will automatically sound. If the alarm sounds, evacuate the building.

Fire Fighting Equipment Fire extinguishers are located at strategic points throughout the workplace. Employees are only expected to tackle a fire themselves if it would pose no threat to their personal safety to do so. If the situation is dangerous or potentially dangerous the employee should activate the alarm and evacuate the building immediately.

Fire Doors Fire doors designed to slow the spread of fire and smoke throughout the workplace have been installed at strategic points. Fire doors are designed to close automatically after opening and must never be blocked, jammed or tied open.

Fire Exits Fire doors are located at strategic points throughout the workplace. Exit doors and corridors must never be locked, blocked or used as storage space. Emergency lighting has been installed in exit corridors, above emergency exit doors and throughout the workplace in case of power failure.

Smoking & Vaping UK Smoke Free legislation came into force on 1st July 2007 and reinforces the existing FMS Foils Group Limited smoking policy. Smoking is prohibited anywhere inside the site boundary except the designated external smoking area. The smoking area should always be kept fire safe. Combustible materials must never be stored or allowed to accumulate in the area where smoking is permitted. Smoking is not permitted in vehicles, whilst on site or by employees in vehicles whilst on company business. Matches, lighters and tobacco are not allowed in production and stores areas. Vaping is considered as the same as smoking, so not allowed on the premises except for designated smoking areas. Designated smoking areas:

- Dedicated shelter located in car park.
- Outside Unit 2 away from entrance.
- Outside Wheelwrights under the mezzanine floor away from entrance.

10. Emergency Evacuation Procedure

In the event of the fire alarm being activated, all employees must leave the building by the nearest available exit and assemble at the designated assembly point. Fire Marshals will ensure people within their areas leave quickly & safely and liaise with the person in charge reporting persons missing. The designated assembly points, depending on the units are:

- Unit 1 main car park opposite the offices;
- Unit 2 outside car park close to the oxidiser
- Unit 10 a/b, loading area outside units

Practice fire drills will be conducted every 6 months to ensure employee familiarity with emergency procedures. There will be regular soundings of the alarm systems weekly. This is to test the system, alert new employees, and refresh existing employees of the alarm sound for evacuating the premises. Standing fire orders for evacuating the premises are in all areas, and by fire alarm buttons. The evacuation key points are attached to this policy. Once the alarm has been triggered, the call centre will contact the sales office to confirm an actual fire during 9am – 5pm and will summon the Fire Brigade according to the response. This will happen automatically if outside these hours or no one answers the phone.

If the alarm sounds, this procedure is to be followed by all people on the site: Leave the building immediately. Office staff leaving by the main staircase exit must collect the Visitors' Security Passbook and the employees list on the way out. These are in the front main entrance lobby. Both list and book must be given to the senior person (Roll Call Co-ordinator) at the Assembly Point to conduct a roll call and check visitors and contractors are accounted for.

NB: VISITORS AND CONTRACTORS ARE THE RESPONSIBILITY OF THE PERSON THEY ARE BOOKED IN TO SEE. MAKE SURE THEY ARE AWARE OF THE EVACUATION PROCEDURE, THE ASSEMBLY POINT AND REPORT THEIR PRESENCE TO THE ROLL CALL CO-ORDINATOR.

Fire Marshals should check their designated areas are clear and report this to the roll call co-ordinator. Fire Marshals are not expected to fight fires or to place themselves at risk. At the Assembly Point the senior manager, supervisor or duty engineer must:

- Organise a roll call ensuring that everyone including visitors and contractors are accounted for.
- Liaise with the Fire Brigade on their arrival.
- Agree the return of employees to the factory providing that it is safe to do so.

There are a number of fire evacuation packs which include employee lists at various exits. Any employee passing one during an evacuation must take it from the holder and

give it to the roll call co-ordinator at the Assembly Point. This will ensure at least 1 copy of the list at the roll call. *Please Note: There are live flame sources in the finishing/packing area for shrink-wrapping. Strict no flammable rules apply in these areas. A separate schematic is attached to this policy showing the position of all fire alarm call points.*

11. Accident Investigation & Reporting

It is the policy of FMS Foils Group Limited to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 2013). FMS Foils Group Limited see accident investigation as a valuable tool in the prevention of future incidents. In the event of an accident resulting in injury a report will be drawn up by the Health and Safety Coordinator or a person appointed by the Health and Safety Coordinator detailing:

- The circumstances of the accident including photographs and diagrams wherever possible.
- The nature and severity of the injury sustained.
- The identity of any eyewitnesses.
- The time, date and location of the incident.
- The date of the report.

All eyewitness accounts will be collected as near to the time of the accident as is reasonably practicable. The completed report will then be submitted to the Head of Operations for initial analysis and be reviewed by the Safety Committee to understand why the accident occurred and what action should be taken to avoid a recurrence of the problem.

Near-Miss Reporting In addition to reporting actual injuries, all employees must report "near misses" (incidents that did not result in injury or damage but had the potential to do so) to their supervisor or the Health and Safety Coordinator. Investigating near misses is critical for identifying hazards and preventing future accidents.

12. Accident Procedure – First Aid

In the event of an accident a screen is available to shield employees, this is kept within the canteen in addition to a fully automatic defibrillator and a First Aid kit, further First Aid kits are also located in the sales office, print department, engineering and Wheelwrights' warehouse. These are to be maintained by approved First Aiders. Replacement supplies should be ordered through the Head of Operations. A list of qualified first aiders and appointed persons is posted on notice boards. The Health and Safety Coordinator is responsible for reporting all cases of accident and disease to the Head of Operations. Accident records are compiled by the Health and Safety

Coordinator and stored by the Head of Operations. The Health and Safety Coordinator is responsible for reporting cases of accident and disease to the relevant enforcing authority under the RIDDOR 2013 Regulations where applicable.

13. General Rules

- All employees should be aware of, respect and adhere to the rules and procedures contained in this policy.
- All employees shall immediately report any unsafe practices or conditions to the relevant person.
- Any person under the influence of alcohol or any other intoxicating drug, which might impair motor skills or judgement, whether prescribed or otherwise, shall not be allowed on the job.
- Horseplay, practical joking or any other acts, which might jeopardise the health and safety of any other person, are forbidden.
- Any person whose levels of alertness and / or ability are reduced due to illness, or fatigue will not be allowed on the job if this might jeopardise the health and safety of that person or any other person.
- Employees shall not adjust, move or otherwise tamper with any electrical equipment, machinery or air or water lines in a manner not within the scope of their duties, unless instructed to do so by a senior member of staff.
- All waste materials must be disposed of carefully and in such a way that they do not constitute a hazard to other workers.
- No worker should undertake a job, which appears to be unsafe.
- No worker should undertake a job until he or she has received adequate safety instruction and is authorised to carry out the task.
- All injuries must be reported to the Head of Operations, investigated and recorded in the accident book.
- Employees should take care to ensure that all protective guards and other safety devices are properly fitted and in good working order and shall immediately report any deficiencies to the supervisor or the Health and Safety Coordinator.
- Work shall be planned and supervised to avoid injuries in the handling of heavy materials and while using equipment.
- No employees should use chemicals without the knowledge required to work with those chemicals safely and with the approval of the Technical Department.

- Suitable clothing and protective footwear will be worn at all times. Personal protective equipment shall be worn wherever appropriate.

14. Specific Requirements

Due to the nature of the processes and material used within the site, the following specific points are drawn to the attention of all employees and in terms of everybody's responsibilities under the MHSWR, it is essential that these points are strictly observed.

- Whilst in-running nip rollers are guarded, employees should not attempt to touch them whilst the machines are in motion.
- Due to the flammable nature of the material used, no smoking is permitted anywhere in the factory area or on the site other than the designated area outside the building. Where earth clips are provided, they must be used to prevent sparks from static discharge. Electric and gas trucks must not be used in printing or ink stores areas.
- There is a live flame source in the finishing/packing area for shrink-wrapping. It is expressly forbidden to take any flammable materials through or passed the area adjacent to this flame unit, unless with the specific approval of a senior manager or the Health and Safety Coordinator. In this instance the flame unit will be switched off.
- During the mixing/manufacture and dispensing of inks, protective clothing must be worn. Eye protection and gloves are provided and should be used if splashing or direct skin contact is likely.
- In view of the heavy items within the factory area, which can easily fall or be dropped, protective shoes must be worn by all factory operators, and it is advisory for staff that regularly go on the shop floor or into the yards.
- In view of the flammable nature of much of the material used, it is essential that every employee is aware of the need for good housekeeping, and the following rules should be observed:
 - All ink and solvent containers, whether empty, part filled or full must always have lids in place, other than for dispensing.
 - All empty cans should be returned to the appropriate store for disposal.
 - All waste material should be kept in the bins provided internally, and these bins should be emptied at regular intervals to ensure that the quantity of waste is kept to a minimum.
 - All gangways must be kept clear.

- All fire exits must be kept clear and the signs marking the fire and emergency exits must not be obscured.

15. Working Environment

- Work sites must be kept clean and tidy.
- Any spillage must be cleaned up immediately.
- Waste materials and rubbish must be removed routinely.
- All combustible waste materials must be discarded in approved containers.
- All pits and holes must be covered when not in use and clearly marked with warning signs when in use.
- Materials in production and in stores must be stacked neatly and safely (without blocking fire exits and escape routes).

16. Walkways & Access

- Walkways and passageways must be always kept clear from obstructions.
- If a walkway or passageway becomes wet, it should be clearly marked with warning signs and / or covered with non-slip material until cleaned up.
- Trailing cables, hose, strapping, film & loose wrappings are a trip hazard and should not be left in any passageway, or around machines. This particularly applies to stores and yard areas and core stock where goods are unpacked.
- Any significant change in the floor elevation of any walkway or passageway must be clearly marked.
- Where objects are stored in or around a passageway, care must be taken to ensure that no long or sharp edges jut out into the passageway in such a way as to constitute a safety hazard.
- Working at Height: Operations on mezzanine floors, including loading, unloading, or accessing edges, must comply with the Work at Height Regulations 2005. Proper edge protection must be maintained at all times, and employees must not expose themselves to fall risks.

The main factory and separate stores warehouse do not allow for separate pedestrian and vehicular routes. Drivers must be aware at all times that other vehicles or pedestrians could be in their working areas and always sound the horn on blind corners, reversing and when entering and leaving the buildings. Where any vehicles or other moving machinery is using a passageway, pedestrians should use an alternative route wherever possible. Pedestrians must expect vehicular traffic to be in the vicinity and remain alert. This is particularly important when loading or unloading of mezzanine

floors – do not walk near or under loads & wait for forks/clamps to be at an accepted level.

17. Tools and Equipment Maintenance

- Company machinery and tools are only to be used by qualified and authorised personnel. It is the responsibility of the supervisor to determine who is authorised to use specific tools and equipment.
- It is the responsibility of all employees to ensure that any tools or equipment they use are in a good and safe condition. Any tools or equipment, which are in any way defective must be repaired or replaced.
- All tools must be properly and safely stored when not in use.
- No tool should be used without the manufacturers recommended shields, guards or attachments.
- Approved personal protective equipment must be properly used where appropriate.
- Persons using machine tools must not wear clothing, jewellery or long hair in such a way as might pose a risk to their, or anyone else's safety. There is a "no jewellery" policy in force as part of our hygiene and foreign matter due diligence precautions.
- Employees are prohibited from using any tool or piece of equipment for any purpose other than its intended purpose.

18. Personal Protective Equipment

- Employees must use all personal protective equipment provided to them in accordance with the training and instruction given to them regarding its use.
- Employees who have been provided with personal protective equipment must immediately report any loss of or obvious defect in any equipment provided to their supervisor or the Head of Operations.

19. Manual Lifting and Moving

- Lifting and moving of objects should always be done with mechanical devices rather than manual handling wherever reasonably practicable. The equipment used should be appropriate for the task at hand.
- Safe working loads are marked on lifting equipment, and this is the maximum weight, including bars, yolks and material to be lifted. Operators should establish the weights of all bars etc. before attempting a lift.

- The load to be lifted or moved must be inspected for sharp edges, slivers and wet or greasy patches.
- When lifting or moving a load with sharp or splintered edges gloves must be worn. Gloves should be free from oil, grease or other agents, which might impair grip.
- The route over which the load is to be lifted or moved should be inspected to ensure that it is free of obstructions or spillage, which could cause tripping or spillage.
- Employees should not attempt to lift or move a load, which is too heavy to manage comfortably.
- Where team lifting or moving is necessary one person should act as co-ordinator, giving commands to lift, lower etc.
- When lifting an object off the ground employees should assume a squatting position, keeping the back straight. The load should be lifted by straightening the knees, not the back. These steps should be reversed for lowering an object to the ground.

20. COSHH (Control of Substances Hazardous to Health)

The Head of Operations along with the other Managers will obtain Health and Safety COSHH data concerning the hazard status and handling precautions of the various materials used in the works and advise employees accordingly. This information is available for all employees to consult on request, some of which will be posted in appropriate areas. The data sheets will be filed in the COSHH Manuals with a separate annex for Engineering. Any person, including contractors, must obtain Company approval to bring on site any compounds or materials which may be hazardous. COSHH data sheets need to be supplied for the approval assessments to be made.

21. Storage & Handling

FMS Foils Group Limited will provide appropriate storage for articles and substances as required under COSHH and safe use handling systems for moving materials around the site.

22. Driving on Company Business (excludes driving to & from work)

You may need to use your own car for company business. This would be most likely for sales staff and directors, but also on occasions for other employees. If this applies to you, you MUST hold a current and valid driving license, have adequate insurance cover and the vehicle you use to be fully road legal (MOT'D as required) and maintained to a safe standard. You must plan your journeys to consider the time you will be driving, potential bad weather problems and allowing for adequate rest breaks on journeys of

longer than 2 hours. Do not attempt to eat or drink whilst driving. You must drive safely and within the law. This includes NOT using mobile phones unless with approved hands-free kit or being distracted with satellite navigation equipment whilst driving, even with hands free kit, it is preferable to wait until you can safely pull off the road and stop before using phones & satellite navigation devices. The police could prosecute in the event of an accident, if they feel the driver was distracted even using hands free kit.

23. Control of Contractors

All external contractors must report to the site management or designated supervisor before commencing any work. They must be made fully aware of site-specific hazards, emergency evacuation procedures, and must adhere to the regulations always outlined in this Health and Safety Policy while on site.

24. Display Screen Equipment (DSE)

FMS Foils Group Limited is committed to complying with the Health and Safety (Display Screen Equipment) Regulations 1992. Display Screen Equipment (DSE) refers to any alphanumeric or graphic display screen, which incorporates standard desktop computer monitors, laptops, tablets, smartphones, and digital television screens. Under UK law, an employee who routinely uses this equipment for a significant part of their normal working day is classified as a 'DSE User'.

Health Hazards & Ergonomic Risks Prolonged or unmanaged DSE work is a primary driver for workplace absenteeism. Key health complications directly linked to poor ergonomic conditions include:

- Work-Related Upper Limb Disorders (WRULDs) affecting hands, wrists, and forearms, such as carpal tunnel syndrome.
- Musculoskeletal Disorders (MSDs) causing severe back, neck, and shoulder strain due to static or awkward seated postures.
- Visual fatigue, including temporary eye strain, localized focus fatigue, blurred vision, and persistent headaches.
- Psychological stress magnified by physical discomfort, heavy workloads, or poor workspace layouts.

Employer Duties & Controls To minimize health and safety exposure, the company will execute and document the following controls:

- Conduct a detailed ergonomic workstation self-assessment of all user workstations to identify ergonomic and environmental hazards.
- Provide suitable hardware and adjustable furniture, such as separate monitors, keyboards, and compliant chairs.

- Design workloads to incorporate short, frequent breaks or alternative tasks away from the display screen.
- Fund free professional eye and eyesight tests upon request and provide basic corrective appliances (spectacles) if required specifically for DSE work.
- Provide comprehensive health and safety training explaining how to adjust furniture and maintain ideal postures.

Workstation Ergonomics & Environment

- Chairs must have a stable 5-star base, adjustable height, and an adjustable backrest with reliable lumbar support.
- Seat height must be adjusted so forearms are horizontal when typing, keeping wrists completely flat and straight.
- The mouse and keyboard should be arranged to leave a clear gap at the front of the desk to support hands between typing.
- Laptops are restricted to short duration use unless a docking station, elevated screen, and separate peripherals are provided to prevent WRULDs.
- If an employee cannot place both feet flat on the floor without pressure on the underside of their thighs, the company will provide a suitable footrest.
- Indoor temperatures for sedentary office environments must always be maintained at a minimum of 16°C.
- Workstation layouts should guarantee a minimum room volume of 11 m³ of unoccupied space per employee.
- Lighting must be aligned to eliminate screen reflections, shadows, or screen glare, utilizing blinds or anti-glare filters.




Paul Barnes (Head of Operations) / Dima Koshel (Managing Director)