

Fastsource Ltd



Company Health, Safety & Environmental Policy

Approved by:	Keith Blasket
Position:	Managing Director
Signed by:	
Date:	6th January 2025

Fastsource Limited - Health, Safety & Environmental Policy				
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NOTE:

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Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

TABLE OF CONTENTS

SECTIONS:

1. INTRODUCTION
2. HEALTH SAFETY AND ENVIRONMENT POLICY STATEMENT
 - 2.1 **Work safe statement**
3. ORGANISATION TO IMPLEMENT THE POLICY:
 - 3.1 **Organisational flowchart**
 - 3.2 **The Company: division of responsibilities**
 - 3.2.1 Roles
 - 3.2.2 The Managing Group
 - 3.3 **Duties of the Health & Safety management consultant**
 - 3.4 **Duties of employees and self-employed**
 - 3.4.1 Whistle-blowing Policy
 - 3.5 **Sub-contractor's duties**
4. HEALTH & SAFETY ARRANGEMENTS
 - 4.1 **Training**
 - 4.2 **Risk assessment**
 - 4.2.1 Employment of young persons
 - 4.2.2 Serious and imminent danger
 - 4.3 **Supervision and activity control**
 - 4.4 **Safe place of work and housekeeping**
 - 4.5 **Environmental protection and waste control**
 - 4.5.1 Waste control
 - 4.5.2 Recycling
 - 4.5.3 Carbon footprint policy
 - 4.6 **Communication**
 - 4.7 **Occupational Health control**
 - 4.8 **Welfare arrangements**
 - 4.9 **First Aid arrangements**
 - 4.10 **Site security and protection of the public**
 - 4.11 **Monitoring, audit and review**
 - 4.11.1 Public relations
 - 4.12 Data protection
5. REPORTING OF ACCIDENTS & DANGEROUS OCCURRENCES
 - 5.1 **Accident injury reporting procedure**
 - 5.1.1 Introduction
 - 5.1.2 Scope of regulations (See schedule in Regs)
 - 5.1.3 Internal notification procedures
 - 5.1.4 External notification procedures
 - 5.2 **Fire and emergency arrangements**
 - 5.3 **Occupational health surveillance**
6. CONSTRUCTION DESIGN AND MANAGEMENT
7. CONTRACTOR SELECTION
8. ASBESTOS
9. DEMOLITION
10. WORKING WITH LEAD
11. WORK & ELECTRICAL EQUIPMENT, PLANT AND MACHINERY
 - 11.1 **Hand and power tools**
12. VIBRATION
13. WORKING PRACTISES
 - 13.1 **Hazard/warning signs and notices**
 - 13.2 **Working conditions/environment**

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

13.3 Protective clothing and equipment

- 14. WORKING ON OR NEAR WATER
- 15. WORKING ADJACENT OR ON THE PUBLIC HIGHWAY
- 16. NOISE
- 17. CONFINED SPACE WORKING
- 18. WORKING AT HEIGHT

18.1 Arrangements for securing the Health and Safety of workers

- 19. SAFE USE OF ACCESS EQUIPMENT

19.1.1 Scaffolding

19.1.2 Mobile access towers

19.2 Lifting of persons

- 20. SAFE USE OF MACHINERY
- 21. MANUAL HANDLING AND LIFTING
- 22. MECHANISED MATERIAL AND LIFTING
- 23. INDUSTRIAL HYGIENE, COSHH AND SAFE WORKING PRACTICES

23.1 CoSHH/incident emergency policy

- 24. CHEMICALS IN CONSTRUCTION & REFURBISHMENT
- 25. DUST AND VAPOUR HAZARDS
- 26. BIOLOGICAL HAZARDS
- 27. SITE SAFETY – CLIENTS AND OTHER PERSONS
- 28. VEHICLES
- 29. MOBILE TELEPHONES
- 30. LONE WORKING
- 31. VIOLENCE AT WORK
- 32. FOREIGN LANGUAGE SPEAKERS
- 33. ASYLUM AND IMMIGRATION VERIFICATION

- 34. WORKING TIME

34.1 Jury Duty-Court Attendance Procedure

- 35. STRESS
- 36. EQUAL OPPORTUNITIES
 - 36.1 Sex discrimination policy
 - 36.2 Disability policy
 - 36.3 Race relation policy statement
 - 36.4 Recruitment policy
- 37. BULLYING AND HARASSMENT
- 38. ETHICAL CONDUCT POLICY
 - 38.1 Anti-bribery policy
 - 38.2 Modern slavery policy

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

- 39. COMPANY GRIEVANCE POLICY
- 40. CHILDREN AND VANDALISM
- 41. OFFICE SAFETY RULES
- 42. DISPLAY SCREEN EQUIPMENT
- 43. DRUGS AND ALCOHOL
 - 43.1 Alcohol**
 - 43.2 Drugs**
- 44. SMOKING
- 45. INSURANCE
- 46. ADVICE
- 47. PAYMENT
- 48. CUSTOMER SERVICE POLICY
- 49. CONSULTATION WITH EMPLOYEES
 - 49.1 Industrial relations policy statement**
- 50. QUALITY POLICY STATEMENT
- 51. FAIRLY TRADED GOODS
- 52. RESPONSIBLE FOREST PRODUCTS PROCUREMENT
- 53. FRAUD AND MALPRACTICE POLICY
- 54. DISCIPLINARY PROCEDURE

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

1. INTRODUCTION

The purpose of this document is to outline the general Health, Safety & Environmental Policy of Fastsource Ltd (“the Company”). This policy details individual responsibilities and safe working practices. It also provides procedures to monitor the effectiveness of the policy.

The Company will also consult with employees and company representatives, in line with its obligations in terms of [The Health Safety \(Consultation with Employees\) Regulations 1996](#).

The Company is committed to managing health and safety on all its projects so as to minimise risk to the fullest extent possible, and to prevent injury and safeguard the health of any operatives, employees or any other persons affected by its operations. The Company notes that lack of control over health, safety & environmental issues and failure to integrate necessary safeguards and functionalities into its overarching Project Management plan may result:

- Harm to people;
- Harm to the environment;
- Impaired business efficiency;
- Financial loss through damage, delays and increased insurance premiums;
- Reputational damage; and/or
- Adverse publicity

In order to avoid any and all of the above, the Company recognises that the key to the successful outcome of any project is effective management and mitigation of risk. To achieve this, it has developed a Health, Safety and Environmental Management System (see 4.0) to provide a structured approach to such management and mitigation. This involves the identification of hazards arising out of the Company’s activities; subsequently, risks are assessed and control measures established and enforced so as to minimise the possibilities of any of the above adverse outcomes arising. The Company is fully committed to Health, Safety and Environmental Management and requires the co-operation of all its employees and contractors in this endeavour.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

2. HEALTH, SAFETY AND ENVIRONMENT POLICY STATEMENT

The Company acknowledges its duties under the [Health and Safety at Work etc. Act 1974](#) (“the 1974 Act”), and related legislation for the health and safety of its employees, members of the public and others who may be affected by its operations. The Company’s policy is to provide safe places of work, safe systems of work, adequate information and training for employees to ensure their health and safety, as well as appropriate measures to ensure the safety of the public and other relevant individuals or categories of persons. All employees also have a duty to co-operate with the management in meeting statutory requirements, and to take reasonable care to avoid injury to themselves and others in the carrying out of their work activities, and

The Company regards its statutory obligations as a minimum standard to be achieved throughout its undertakings, and its fundamental objective is to ensure that all staff work to and enforce high standards of health and safety, and promote the same to others.

The Company is committed to the following objectives: -

- The recognition of Health and Safety as an integral part of all aspects of the work undertaken.
- The continued improvement of our Health, Safety and environmental performance through effective communication, provision of staff training and adoption of the best techniques available.
- The identification of and compliance with all relevant legislation, standards and codes of practice.
- The nomination of specialist staff to assist and advise line management on the safe conduct of activities.
- The implementation of a systematic approach to identify hazards and to allocate resources to control them.
- The elimination or minimisation of all risks associated with work hazards.
- The provision of Health and Safety advice and facilities.
- The continual improvement of facilities and methods of working by targeting future controls.
- The use of energy and fossil fuels efficiently so as to reduce carbon emissions.
- The prevention of polluting incidents.
- The reduction of the amount of waste sent to landfill.
- The conservation of water by reducing demand at all sites and premises.
- The minimisation of the impact that Company activities, sites and premises have on local communities, so as to safeguard relationships with said communities.
- The protection, and where feasible, enhancement of bio-diversity on sites and premises where the Company is responsible or to seek to influence those with that responsibility.
- The education of clients to ensure the use of solutions that benefit the environment; and
- The use of smart working practices to minimise the need to travel, and the use of the most efficient and environmentally friendly mode(s) of transportation where travel is required.

To achieve this, the Company’s director will ensure compliance, so far as is reasonably practicable, with all Health and Safety legislation that is applicable to the business. In addition, the Company shall establish and maintain, so far as is reasonably practicable, a safe and healthy working environment for the benefit of all its employees, sub-contractors, its clients and others who may be affected by our undertakings. In so far as reasonably practicable, the following will be implemented or otherwise put in place:

- Safe plant and systems of work.
- Safe methods of use, handling, storage and transport of articles and substances used at work.
- Provision of such information, instruction, training and supervision necessary to ensure the Health, Safety and Welfare at Work of employees.
- Maintenance of any place of work in a condition that is safe, without risks to health and has a safe means of access and egress.

This policy is a live document, which will be reviewed:

- When U.K. Health & Safety legislation or European legislation is introduced or amended,
- When new technology and/or working practices are introduced;
- When the Company activities or circumstances change; and/or
- Annually.

The Company will also consult with employees and company representatives, in line with its obligations in terms of [The Health Safety \(Consultation with Employees\) Regulations 1996](#).

Signed: For and on behalf of Fastsource Ltd by the Director, Mr Keith Blasket on 6th of January 2025.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket



2.1 Refusal to Work Policy

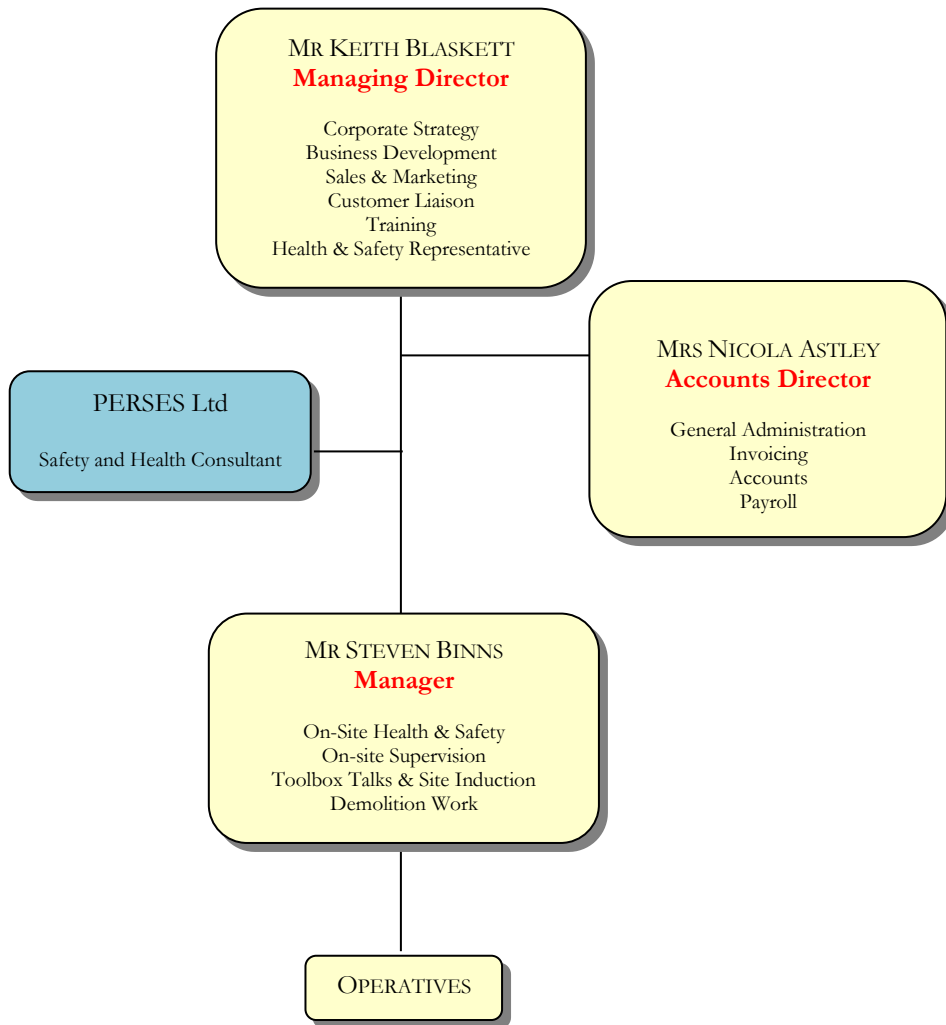
No employee or anyone working on behalf of the Company is expected to carry out any task where the risk to themselves or any other person is considered to be unacceptable. Under this Refusal to Work Policy (Worksafe), each member of staff has the absolute right to refuse to carry out work if he or she feels it is not safe to do so.

Refusal to work on the grounds of this policy is free from any disciplinary action and will not affect in any way the employability of the Company. Refusals to work will be responded to positively and promptly, and the employee raising the Worksafe procedure will be informed of decisions throughout the process.

The Company encourages Managers and staff to report any unsafe acts or working conditions which he or she has witnessed.

3. ORGANISATION TO IMPLEMENT THE POLICY

3.1 Organisational management chart



N.B. The above-noted Managing Directors, General Manager and Operations/Site Manager are hereinafter referred to collectively as “the Managing Group”.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

3.2 The Company: division of responsibilities

The overall and final responsibility for Health, Safety, Welfare and Environmental in the Company is held by the Managing Directors. They are responsible for bringing the Policy Statement to the attention of all management, employees and subcontractors and ensuring compliance by regularly monitoring, auditing and reviewing the safety management action plan & the safety management systems.

It is the also responsibility of the Director (see 3.2.2) with the assistance of the company management and the Health and Safety Consultants (see 3.3), to assess the Health, Safety and Environmental Policy and amend the policy as appropriate.

The said Director and Managers together with those named below form a safety committee which will meet annually.

3.2.1 Roles

The persons responsible as Health & Safety assistants/competent persons are the Managing Group.

The persons responsible as workforce health and safety representatives are the Managing Group

The aforementioned parties plus one other person randomly selected from the workforce will form the safety committee, which is to meet annually.

3.2.2 Managing Group responsibilities

The Health and Safety matters for which the Managing Group are responsible are as follows:

- Provision of suitable financial and time resources for the implementation of a proactive Health & Safety management culture and monitoring the adherence to the said policy/ delegating the monitoring of the sections to competent persons.
- Direct liaison with the Company Secretary (see 3.2.3) and the Health and Safety Consultant to ensure total compliance with current legislation and good practice.
- Gaining an understanding of safety policy, generally and in particular to apply the same to Fastsource Ltd to ensure its effective cooperation with all relevant parties.
- Setting a personal example and encouraging a positive and proactive Health & Safety culture by observing safety procedures and encouraging employees and other persons to do the same.
- Undertaking the role of Health & Safety assistants/competent person.
- Forming part of the safety committee and participating in the committee meetings.
- Implementing and monitoring the specified sections of the policy as instructed by the Director.
- Liaising with the appointed health and safety advisors on all matters regarding health and safety and reporting these matters and findings directly to the Director. (Where not available this role is undertaken by the General Manager or appropriate alternative).
- Assumption of the role as office first aid appointed person.
- Assumption of the role of office fire warden.
- Implementing and monitoring the specified sections of the policy as instructed by the Director.
- Ensuring compliance with the Health & Safety Policy and all relevant legal requirements.
- Observing and reporting any and all Health and Safety infractions occurring on site during site visits.
- Carrying out, upon request, site inspections, the monitoring of all active sites and reporting their findings, in the form of a written report to the Director.
- Highlighting any employee/subcontractor training requirements and arrange/deliver such training with regard to Health & Safety, in the form of on-site modular training ("Toolbox Talks") or off-site tuition relating to legal compliance or the avoidance of specific risk.
- Setting a personal example and encouraging a positive and proactive Health & Safety culture by observing safety procedures and encouraging employees and other persons to do the same.
- Liaising with the appropriate persons in the creation of plans of work including site-specific hazard elimination risk assessments, CoSHH assessments and method statements.
- Undertaking the role of Health & Safety assistants/competent person.
- Forming part of the safety committee as noted.
- Implementing and monitoring the specified sections of the policy as instructed by the Director.
- Setting a personal example and encouraging a positive and proactive Health & Safety culture by observing safety procedures and encouraging employees and other persons to do the same.
- Ensuring compliance with the Health and Safety Policy and all relevant legal requirements.
- Observing and reporting any and all Health and Safety infractions occurring on site during site visits.
- Liaising with the appropriate persons in the creation of plans of work including site-specific hazard elimination risk assessments, CoSHH assessments and method statements.

Fastsources Limited - Health, Safety & Environmental Policy

Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

- Undertaking the role of Health & Safety assistants/competent person.
- Forming part of the safety committee as noted.
- Assuming the role of office first aid appointed person.
- Implementing and monitoring the specified sections of the policy as instructed by the Director.
- Setting a personal example and encouraging a positive and proactive Health & Safety culture by observing safety procedures and encouraging employees and other persons to do the same.
- Ensuring compliance with the Health & Safety Policy and all relevant legal requirements.
- Observing and reporting any and all Health & Safety infractions occurring on site during site visits.
- Liaising with the appropriate persons in the creation of plans of work including site-specific hazard elimination risk assessments, CoSHH assessments and method statements.
- Implementing and monitoring the specified sections of the policy as instructed by the Director.
- Ensuring compliance with the Health & Safety Policy and all relevant legal requirements.
- Ensuring correct channels of communication when working on sites or in private dwellings.
- Ensuring hazard elimination risk assessments have been carried out and any control measures implemented.
- Ensuring all persons in their charge are aware of the hazards and the means of reducing them.
- Ensuring safe systems of work are followed and worked to.
- Ensuring cooperation between the Company's employees and those persons likely to be affected by its activities.
- Carrying out, on request, site inspections, the monitoring of all active sites and reporting their findings, in the form of a written report to the Director.
- Highlighting any employee/subcontractor training requirements and arranging and/or delivering such training with regard to Health & Safety, in the form of on-site modular training ("Toolbox Talks") or off-site tuition relating to legal compliance or the avoidance of specific risk.
- Ensuring the correct supervision of all employees and especially of any young persons.
- Ensuring high standards of housekeeping at all times.
- Ensuring the promotion of safe and healthy working practices.
- Ensuring all defective equipment is removed from service and documented.
- Reporting and investigating all accidents and report those findings to the Manager.
- Ensuring good standards of discipline at all times.
- Reporting all unsafe acts and taking the necessary action to prevent a reoccurrence.
- Setting a personal example and encouraging a positive and proactive Health & Safety culture by observing safety procedures and encouraging employees and other persons to do the same.
- Assuming the responsibility as workforce health and safety representatives including part of the workforce safety committee that meets annually.
- Implementing and monitoring the specified sections of the policy as instructed by the Director.
- Ensuring compliance with the Health & Safety Policy and all relevant legal requirements.
- Ensuring correct channels of communication when working on sites or in private dwellings.
- Ensuring hazard elimination risk assessments have been carried out and any control measures implemented.
- Ensuring all persons in their charge are aware of the hazards and the means of reducing them.
- Ensuring safe systems of work are followed and worked to.
- Ensuring cooperation between the Company's employees and those persons likely to be affected by its activities;
- Carrying out, on request, site inspections, the monitoring of all active sites and reporting their findings, in the form of a written report to the Director.
- Highlighting any employee/subcontractor training requirements and arranging and/or delivering such training with regard to Health & Safety, in the form of on-site modular training ("Toolbox Talks") or off-site tuition relating to legal compliance or the avoidance of specific risk.
- Ensuring the correct supervision of all employees and especially of any young persons.
- Ensuring high standards of housekeeping at all times.
- Ensuring the promotion of safe and healthy working practices.
- Ensuring all defective equipment is removed from service and documented.
- Reporting and investigate all accidents and report those findings to his or her Line Manager.
- Ensuring good standards of discipline at all times.
- Reporting all unsafe acts and taking the necessary action to prevent a reoccurrence.
- Setting a personal example and encouraging a positive Health and Safety culture by observing safety procedures and encouraging employees and other persons to do the same.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	6th January 2026	Stephen McCann	Keith Blasket

3.3 Duties of the Health & Safety Consultant

To assist in developing a proactive attitude to Health, Safety and Environmental matters, the external consultant as identified in section 3.1 will assist by advising on and encouraging a positive Health and Safety Management culture throughout the organisation, with duties as follows:

- Informing the Director and Company Secretary of relevant new legislation, recommend working methods for compliance and assist with dissemination of this information throughout the organisation.
- Carrying out, on request, site inspections, the monitoring of all active sites and reporting their findings, in the form of a written report to the Director responsible for health, safety and welfare.
- Highlighting any employee/subcontractor training requirements and, where appropriate, provide such training with regard to Health and Safety, in the form of on-site modular training ("Toolbox Talks") or off-site tuition relating to legal compliance or the avoidance of specific risk.
- Feeding back information, suggestions, problems, concerns etc., from the workforce to his or her Line Manager and assisting them to measure performance and to set objectives to effect improvement.

SAFETY ADVISOR DETAILS:

Name: PERSES Ltd
Address: 36 Venturefair
Postcode: Edinburgh, Lothian EH17 8WD
Contact: Mr. Stephen McCann
Mobile: 07595 293058
E-mail: stephen@perses.org.uk
Web: www.perses.org.uk

3.4 Duties of employees and the self-employed

All persons at work carry individual responsibilities and these are outlined in sections 7 and 8 of the 1974 Act as follows:

- To take reasonable care of themselves and other persons who may be affected by their acts or omissions,
- To co-operate with the employer so far as is necessary to enable the employer to comply with his statutory duties, and
- Not to intentionally or recklessly interfere with or misuse anything provided in the interest of Health, Safety or Welfare.

Failure to comply with the above may render the employee liable to disciplinary action as determined by their contract of employment or any relevant law.

In particular, all persons working within the Company will at all times:

- Work to recognised safe industry working procedures;
- Ensure compliance with The Industry Standards;
- Cooperate with the Company on all matters regarding health, safety and welfare;
- Cooperate with the principal contractor / client on all matters regarding health, safety and welfare;
- Report all defective equipment to their Site Supervisor;
- Comply with the Waste Recycling and Environmental policy;
- Maintain good housekeeping standards at all times;
- Ensure tools and equipment are in good order and that they comply with the [Provision and Use of Work Equipment Regulations 1998](#);
- Use appropriate personal protective equipment (PPE) as required by the task in hand;
- Report all accidents, incidents and near misses to their immediate Supervisor and cooperate fully in any future investigation; and
- Set a personal example by observing safety procedures, and encourage work colleagues and other persons to do likewise.

3.4.1 Whistle-blowing Policy

The Company encourages workers to raise genuine concerns about malpractice at the earliest possible stage in the right way. This applies to all Company employees, consultants, temporary and agency workers, and anyone on a contract for services.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

The objectives of this policy are:

- To support the current legal requirements of the [Public Interest Disclosure Act 1998](#).
- To support the Company's values.
- To ensure employees can raise concerns without fear of suffering retribution.
- To provide a clear and confidential procedure.

This policy is informed by the following key principles

- Any concerns raised will be treated fairly and properly.
- The Company will not tolerate the harassment or victimisation of anyone raising a genuine concern.
- Any individual making a disclosure will retain their anonymity unless they agree otherwise.
- The Company will ensure that the individual raising the concern is aware of who is handling the matter.
- The Company will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are mistaken. This assurance does not extend to someone who maliciously raises a matter they know is untrue.

The types of matters regarded as malpractice for the purposes of this policy are:

- Fraud or financial malpractice
- Corruption, bribery or blackmail
- Criminal offences
- Failure to comply with a legal or regulatory obligation
- Miscarriage of justice
- Endangering the health and safety of an individual
- Endangering the environment
- Concealment of any of the above.

For personal grievances please use refer to the Company Grievance Policy.

If an individual has a concern about malpractice the issue should first be raised with his or her Line Manager either orally or in writing. If the individual does not feel able to raise the matter with his or her Line Manager, a member of the Managing Group may be approached. In the event of an independent third party is preferred, it can be discussed in confidence with the safety consultant, Stephen McCann (07595 293058)

Once a concern has been raised internally, the employee involved will be kept informed on who is handling the matter, how contact can be made with him or her, and if anything further is needed.

The Company will give as much feedback as possible without infringing any duty of confidence owed by the Company to someone else. The Company will not disclose the identity of a party raising a concern without obtaining the consent of that person. If the situation arises where the Company is not able to resolve the concern without revealing the identity of a relevant party (e.g. if evidence is required in court), this will be discussed in order to determine the best way to proceed.

Independent advice can be sought at any time from the independent charity Public Concern At Work (0207 404 6609). Their lawyers can give provide free confidential advice at any stage about how to raise a concern about serious malpractice at work. (<http://www.pcaw.co.uk/>).

3.5 Subcontractors duties

Please refer to the Sub-Contractors Health and Safety Policy in the Appendix to this policy.

ALL SUBCONTRACTORS WILL BE REQUIRED TO SIGN FOR A COPY OF THE SUB-CONTRACTS POLICY.

All subcontractors will be subject to a pre-qualification appraisal, following the successful approval, the individual subcontractors will be subject to the terms and conditions as per the Appendix.

4. HEALTH AND SAFETY ARRANGEMENTS

This section lists the arrangements that comprise the main elements of the Company's Health & Safety Management System. These arrangements will receive consideration for all work undertaken by the company and in particular when formulating hazard elimination risk assessments, CoSHH assessments, method statements, safe systems of work and safety plans.

For further specialist advice, the services of the consultants are available to the Company, its employees and subcontractors.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

4.1 Training

In order to continually assess the competence level of all managers, employees and sub-contractors, the Company has adopted a Training Needs Analysis (TNA) programme, involving regular employee personal assessments. Each employee will be trained to the Accredited Certification Scheme, as determined by the CITB-Construction Skills scheme and at all times will work to the current industry standards. These certificates are valid for five years on average and therefore a continual programme of reassessment and/or refresher training is paramount to the continual development of each employee.

All members of the Company will be part of its Continual Professional Development (CPD) program. Training requirements for each employee will be identified, with regard to his job specification and competence levels along with any safety-related training required. As a minimum, job-specific training and Category-A asbestos awareness training will be given to each employee.

The majority of training shall be conducted in-house by one of the nominated in-house trainers.

The training programme is divided into four main categories:

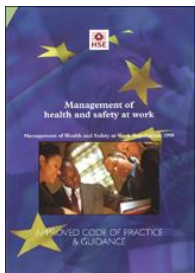
1. Induction Training for new starters, e.g. company and industry safety procedures, site safety awareness, working at heights and use of access equipment, Safe use of tools plant and equipment, et cetera.
2. Skills training including specialist provider training. plant operators, work equipment, first aid, manual handling, noise, CoSHH awareness, risk assessment, et cetera.
3. Site-based modular training or "Toolbox Talks" covering, asbestos awareness, safe use of tools and equipment, working at heights, hot work, confined spaces, permit-to-work systems, et cetera.
4. Safety management training covering company policies and procedures, risk assessment procedures, et cetera.

In addition to the above the Company will at all times ensure that:

- Training records are produced and placed with each individual personal record.
- Refresher training will be highlighted during the review of personal training files at regular intervals and in conjunction with the training needs analysis.
- The identification of suitable training is the responsibility of the Director with assistance from the Company safety advisors.

The persons responsible for ensuring all persons receive specific training are the Managing Group.

4.2 Risk assessment



Regulation 3(1)(a)(b) of the [Management of Health and Safety at Work Regulations 1999](#) establishes a duty on “*every employer to carry out an assessment of the risks to health and safety of his employees and non-employees while they are at work*”. Identification of hazards, assessment of the risk and the establishment and enforcement of control measures are the cornerstones of effective risk management.

Control measures are defined in the form of written safe working procedures, method statements, safety plans and relayed through formal information channels, instruction and training to the persons at risk by line management (see flow chart – 3.1). In order to ensure control procedures are being observed, risk assessments when completed will introduce or recommend control measures. These control measures will then be developed into safe working procedures. A continuous procedure of audit and review will be a major part of the safety management system.

The said Regulations specifically refer to the employment of young persons, pregnant or recently pregnant females as requiring specific risk assessment (see section 4.2.1: Employment of young persons).

The persons responsible for conducting risk assessments are the Managing Group.

4.2.1 Employment of young persons

For the purposes of said Regulations a "young person" is one who has not attained the age of 18.

It is the Company's policy not to employ young persons who do not have sufficient experience.

The persons responsible for the employment status of young persons are the Managing Group.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

4.2.2 Serious and Imminent Danger

Assessment of risk will be undertaken for potentially serious and imminent danger, where applicable fire emergency, evacuation and other emergency situations will be assessed. If the finding requires it, emergency evacuation drills will be implemented, practised and enforced as the works require.

The persons responsible for conducting these risk assessments are the Managing Group.

4.3 Supervision and activity control

Management responsibility within the Company for the supervision and activity control of Health and Safety is as set out in the flowchart in section 3.1.

This responsibility is passed through the management chain to the Site Supervisor who, on a day-to-day basis will provide direct supervision at the operational level. Senior management will provide adequate resources and support to enable the Site Supervisor to adequately control and co-ordinate activities at the operational level.

The persons responsible for supervision are the Managing Group.

4.4 Safe Place of Work and Housekeeping

Housekeeping is an essential feature of accident prevention and good working practices. The Company will provide adequate secure storage arrangements as a priority and will work to ensure that accumulated waste is avoided. The Company will dispose of all waste correctly at the end of each working day.

The Company will strictly enforce good work procedures relating to high-risk activities (e.g. working at height, asbestos, lead, excavations, gas and or electrical work, use of lifting equipment, confined space working, traffic and/or pedestrian management, plant & equipment, and maintenance work).

The persons responsible for maintaining a safe place of work are the Managing Group.

4.5 Environmental Protection & Waste Control

The Company will ensure, so far as reasonably practicable, that the environmental impact of its operations is minimised. The Company will also ensure that as much care as is reasonably practicable is taken to reduce the impact on parties potentially affected by its activities (e.g. by noise and dust).

The principal legislation governing waste disposal is contained within the [Environmental Protection Act 1990](#) and subordinate legislations. Information on compliance with the duties of waste disposal can be found in the Department of Environment approved code of practices "Waste Management Duty of Care". The Company undertakes to comply with the above-noted legislation at all times.

4.5.1 Waste Control

The two main categories of waste covered by the environmental protection legislation are:

- Special Waste
- Controlled Waste

The Company will ensure that waste of either category will be transported and disposed of in line with the particular requirements of the [Controlled Waste Regulations 1992](#) and Schedule 2 to the [Special Waste Regulations 1996](#).

AS A GUIDE, THE FOLLOWING APPLIES:

Controlled Waste

Controlled waste products are defined as a low hazard including all industrial, commercial and similar wastes regardless of the type of premises which also includes waste generated by private households and collected by the local authority.

Special Waste

Special waste products are defined as types that are dangerous or difficult to keep, treat or dispose of or are harmful to the environment.

The Company will ensure that all wastes are:

- Clearly identified;

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

- Securely stored; and
- Controlled and Special wastes are disposed of by an authorised Contractor or Local Authority;

In addition, the Company will ensure that Waste Transfer Notes are held for two years.

The persons responsible for waste flow control are the Managing Group.

4.5.2 Recycling

The Company will comply with its duties as determined by the [Environment Act 1995](#) and note the benefits of the recycling of waste products.

4.5.3 Carbon Footprint

The Company is committed to reducing its environmental impact, where practicable. Carbon-reducing measures will form an integral part of the overall Company strategy and will help to improve operational performance and a reduction in potentially harmful emissions to land, water and air.

Our aim is for a 0% carbon balance to be achieved within a realistic and achievable period. The target date will be set once the directors have analysed all business operations.

To help achieve carbon neutrality, the Company will;

- Comply with all current energy legislation, seeking to meet or better legislative targets
- Minimise waste, promote recycling, and the use of recycled products to help reduce the amount of waste sent to landfill
Continue to promote and design energy efficient, and therefore carbon reducing equipment, on behalf of clients
- Promote environmental awareness and responsibility amongst employees and others and seek to continuously improve Company environmental performance
- Actively promote “video conferencing” as a means of reducing travelling
- Evaluate the potential benefits of carbon off-setting

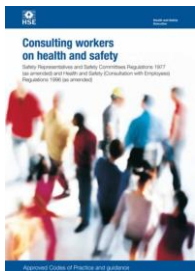
Actions developed to date include;

- Integration of environmental issues into all aspects of the decision-making processes
- Sustainable sourcing Purchasing Policy
- Installation of energy efficient, and therefore carbon reducing equipment throughout Company premises
- Vehicle sharing policy
- The assessment and procurement of fuel-efficient vehicles

This policy clearly identifies the responsibilities and procedures for achieving the Company’s stated objectives in all aspects of its activities leading to improved environmental performance, including reductions in both CO2 and methane emissions.

The persons responsible for waste flow control are the Managing Group.

4.6 Communication



It is a requirement of the 1974 Act and the aforementioned 1999 Regulations that employers undertake such communication with the workforce so as to enable the promotion and development of health and safety in the workplace and also to monitor its effectiveness. In addition, the [Health and Safety Information for Employees Regulations 1989](#) requires employers to provide Health, Safety and Welfare information in the form of an approved poster or an approved leaflet.

The aforementioned 1996 Regulations require employers, in the situation where there are employees (being those who are not already represented by Safety representatives under the [Safety Representatives and Safety Committee Regulations 1997](#)) to consult with those matters of health and safety (see section 48.0. Consultation with Employees).

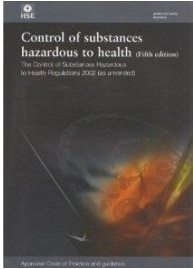
Communication and consultation will be effected through such media as inductions, toolbox talks, safety representatives, safety committees, safety review meetings bulletins and formal and informal means of communication.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

In accordance with said Regulations, the Safety Committee comprises of employees and management representatives as highlighted in section 3.2.1. The constitution will determine how the committee is run.

The persons responsible for communications are the Managing Group.

4.7 Occupational Health Control



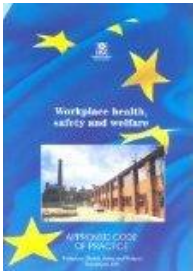
The Company will adhere [Control of Substances Hazardous to Health Regulations 2002](#) (CoSHH) in the assessment of the effects of any substances hazardous to health and the adoption of relevant control measures. Similarly, under the [Control of Noise at Work Regulations 2005](#) assessments will be made to ascertain noise levels and all relevant precautions will be taken to avoid or protect against excessive noise levels.

For the employees who use any tool that may affect their health, safety and welfare, hand-arm vibration will be included in occupational health monitoring and procedures exist to safeguard against Hand Arm Vibration Syndrome (HAVS). All work will be carried out in compliance with [The Control of Vibration Regulation 2005](#).

See section 5.3 for the occupational health monitoring Policy.

The persons responsible for conducting risk and CoSHH assessments are the Managing Group.

4.8 Welfare Arrangements



The Company will provide welfare arrangements in accordance with the [Workplace \(Health, Safety and Welfare\) Regulations 1992](#) as amended, and the [Construction \(Design and Management\) Regulations 2015](#).

Where work is within a client's private dwelling, the Company will, prior to the commencement of work, ascertain as to whether the client will allow its employees the use of their welfare facilities. Where the work is carried out on an active site, welfare arrangements will be the responsibility of the Principal Contractor.

The persons responsible for arranging welfare arrangements are the Managing Group.

4.9 First Aid Arrangements



All office-based employees will be instructed as to the location of the First Aid post and informed who the First Aid-trained employees are. All site-based operatives will be instructed as to the location of site-based First Aid posts and the employees proficient in the provision of First Aid.

The Company will ensure compliance with the [Health & Safety \(First Aid\) at Work Regulations 1981](#) by appointing suitably qualified persons as approved by the Health & Safety Executive (HSE). As detailed in the Approved Codes of Practice (ACoP), where possible the Company can make arrangements to share First Aiders and facilities (e.g. where employees of more than 1 company are working together on one site). Any such arrangements will be communicated to all company employees.

First Aid responsibilities:



- Site: All operatives are currently trained, the Supervisor has overall responsibility.
- Office: all members of the office staff are trained.
- First Aid box located in the office: the Office Manager is responsible for its condition.
- First Aid box located on all company sites: Site Supervisors are responsible for their condition.
- First Aid boxes, located in all company vehicles: Vehicle drivers are responsible for their condition
- The manager is responsible for the arrangement of proper training (see section 4.1).

4.10 Site Security and Protection of the Public

The Company will take all reasonably practical measures to secure the workplace, with particular focus being paid to preventing children from accessing and/or being injured on any work premises.

Measures that the Company will consider include:

- Provision of fencing;
- Removal of access equipment or boarding over access points;
- The securing and immobilising all Plant & Equipment;

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

- The stacking any items which can fall or topple, in a way not to cause danger;
- The securing, boarding up and closing off clients' properties;
- Ensuring security of equipment and materials;
- Use of pictorial hazard warning signage;
- Use of temporary security lighting; and
- Ensuring good standards of housekeeping

The persons responsible for controlling site security are the Managing Group.

4.11 Monitoring, Audit and Review



The Company will conduct all monitoring, auditing and reviews in line with the [Health and Safety Executive's Guidance HSG65](#). The Company will establish a formal recorded system of inspection, monitoring and review to enable all tiers of management to assess control measures and identify problem areas. This will include weekly safety inspection reports completed by the Site Supervisor, with management carrying out their own formal, independent inspection on a monthly basis, where required.

Independent monitoring and auditing by the Safety Consultant will supplement these arrangements. These findings will be reviewed and necessary corrective action taken prior to the implementation of any site or operational changes.

As part of a continuous improvement programme, monthly audits (as part of the ISO: 9001, 14001 & 45001) will be carried out by the appropriate manager to assess performance and set objectives.

The persons responsible for audits are the Managing Group.

4.11.1 Public Relations

All levels of management within the Company are responsible for dealing with and setting up procedures for recording initial enquiries, complaints etc., from clients and the general public. All communications will be dealt with courteously and expeditiously. All complaints and follow-up actions will be recorded and reviewed as necessary.

The persons responsible for public relations are the Managing Group.

4.12 Data Protection Policy

4.12.1 Introduction

The Company is fully committed to compliance with the requirements of the [Data Protection Act 2018](#) and [General Data Protection Regulations 2018](#) (hereafter referred to as GDPR-18). It will therefore follow procedures ensuring that its employees, elected members, contractors, agents, consultants, partners etc who have access to any personal data held by or on behalf of the Company are fully aware of and abide by their duties and responsibilities under the Act and Regulations.

4.12.2 Statement of Policy

The Company has to collect and use information about the people with whom it works and employs. These may include members of the public, current, past and prospective employees, clients and customers, and suppliers. In addition, it may be required by law to collect and use information in order to comply with the requirements of the central government. This personal information must be handled and dealt with properly, however, it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means, and there are safeguards within the Act to ensure this.

The Company regards the lawful and correct treatment of personal information as very important to its successful operations, and as critical towards maintaining confidence between the Company and those with whom it carries out business. The Company will ensure that it treats personal information lawfully and correctly, as per the said 2018 Act.

4.12.3 The principles of data protection

The 2018 Act stipulates that anyone processing personal data must comply with the **Eight Principles** of good practice. These are legally enforceable.

The Eight Principles set out the following requirements for personal information:

- Shall be processed fairly and lawfully and in particular, shall not be processed unless specific conditions are met.
- Shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
- Shall be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

- Shall be accurate and where necessary, kept up to date.
- Shall not be kept for longer than is necessary for that purpose or those purposes.
- Shall be processed in accordance with the rights of data subjects under the Act.
- Shall be kept secure i.e. protected by an appropriate degree of security.
- Shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

4.12.4 Personal and sensitive data

The 2018 Act provides conditions for the processing of any personal data. It also makes a distinction between **personal data** and **”sensitive” personal data**.

Personal data is defined as data relating to a living individual who can be identified from:

- That data;
- That data and other information which is in the possession of, or is likely to come into the possession of the data controller and includes an expression of opinion about the individual and any indication of the intentions of the data controller, or any other person in respect of the individual.

Sensitive personal data is defined as personal data consisting of information relating to:

- Racial or ethnic origin;
- Political opinion;
- Religious or other beliefs;
- Trade union membership;
- Physical or mental health or condition;
- Sexual life;
- Criminal proceedings or convictions.

4.12.5 Handling of personal/sensitive information

The Company will through appropriate management and the use of strict criteria and controls as laid down in GDPR:-

- Observe full conditions regarding the fair collection and use of personal information;
- Meet its legal obligations to specify the purpose for which information is used;
- Collect and process appropriate information and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- Ensure the quality of information used;
- Apply strict checks to determine the length of time information is held;
- Take appropriate technical and organisational security measures to safeguard personal information;
- Ensure that personal information is not transferred abroad without suitable safeguards;
- Ensure that the rights of people about whom the information is held can be fully exercised under the Act.

These include:

- The right to be informed that processing is being undertaken;
- The right of access to one’s personal information within the statutory 40 days;
- The right to prevent processing in certain circumstances;
- The right to correct, rectify, block or erase information regarded as wrong information.

In addition, the Company will ensure that:

- There is someone with specific responsibility for data protection in the organisation. – Nicola Astley: Data Protection Officer.
- Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practices.
- Everyone managing and handling personal information is appropriately trained to do so.
- Everyone managing and handling personal information is appropriately supervised.
- Anyone wanting to make enquiries about handling personal information, whether a member of staff or a member of the public, knows what to do.
- Queries about handling personal information are promptly and courteously dealt with.
- Methods of handling personal information are regularly assessed and evaluated.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

- Performance with handling personal information is regularly assessed and evaluated.
- Data sharing is carried out under a written agreement, setting out the scope and limits of the sharing. Any disclosure of personal data will be in compliance with approved procedures.

4.12.6 Information handling

The Company is committed to ensuring that all relevant parties are made aware of GDPR and the 2018 Act, the Eight Principles, and their duties and responsibilities in terms of the same. The Company will also seek to ensure that its staff will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. In particular, the Company will ensure that:

- Paper files and other records or documents containing personal/sensitive data are kept in a secure environment;
- Individual passwords should be such that they are not easily compromised.
- Personal data held on computers and computer systems is protected by the use of secure passwords, which where possible have forced changes periodically.

All contractors, consultants, partners or other servants or agents of the Company must:

- Ensure that they and all of their staff who have access to personal data held or processed for or on behalf of the Company, are aware of this policy and are fully trained in and are aware of their duties and responsibilities. Any breach of any provision of the Act will be deemed as being a breach of any contract between the Company and that individual, company, partner or firm.
- Allow data protection audits by the Company or Interested Parties of data held on its behalf (if requested).
- Indemnify the Company of any prosecutions, claims, proceedings, actions or payments of compensation or damages, without limitation.

All contractors who are users of personal information supplied by the Company will be required to confirm that they will abide by the requirements of the Act with regard to information supplied by the Company.

The persons responsible for data protection are the Managing Group.

5. REPORTING OF ACCIDENTS & DANGEROUS OCCURRENCES



Certain injuries, dangerous occurrences and diseases are required by law to be reported to the Health & Safety Executive as per [The Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 1995](#) (RIDDOR 1995) as amended.

The Company will investigate all accidents and near misses. Where the risk element is high, the Company will establish the immediate and underlying causes and, where reasonably practicable, recommend measures to prevent a re-occurrence. In all such circumstances, the safety consultant will be requested to attend the site as soon as possible to carry out an investigation on the Company's behalf.

5.1 Accident Injury Reporting Procedures

5.1.1 Introduction

All work activities are covered by the said 1995 Regulations.

1. All employees and self-employed persons are included.

5.1.2 Scope of Regulations

1. Fatal Accidents
2. Serious injuries or acute illness
3. Accidents involving more than seven day's absence from work or from normal work duties.
4. Occupational diseases
5. Dangerous Occurrences
6. Gas Incidents

5.1.3 Internal Notification Procedures

1. Any accidents must be reported to the Site Supervisor on the Company Accident Report Form.
2. The Site Supervisor shall then investigate the incident and complete his part of the report form.
3. The report should then be passed to the Company Secretary/ Director.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

5.1.4 External Notification Procedures

Any accidents or dangerous occurrences in the scope of the above schedule are to be reported to the Health and Safety Executive via [Form 2508](#) through the correct channels by:

1. Internet: www.riddor.gov.uk
2. Telephone: 0845 300 9923
3. Fax: 0845 300 9924
4. Email: riddor@natbrit.com

The persons responsible for the investigation of the accident are the Managing Group.

Persons responsible for ensuring the accident record book is kept up to date are the Managing Group.

The accident book is located in the main office.

5.2 Fire and Emergency Arrangements



Fire risk prevention will follow the requirements of the [Construction \(Design and Management\) Regulations 2015](#) and The [Regulatory Reform \(Fire Safety\) Order 2005](#). The Office Manager is responsible for ensuring the undertaking of Fire Risk Assessment at the office premises and will be recorded in accordance with the [Management of Health and Safety at Work Regulations 1999](#).

The risk assessment will be reviewed annually and/or when any changes have occurred that reflect any significant change in those conditions.

Arrangements will be made for:

- Communication with Emergency Services
- First Aid arrangements
- Firefighting capability
- Assembly arrangements
- Drills and exercises
- Inspection
- Maintenance
- Records

For further details, reference must be made to the Company's Health and Safety Procedures Manual (ISO 45001 Manual) and the fire safety register.

The persons responsible for this section of the policy are the Managing Group.

DESIGNATED FIRE WARDEN

The Managing Group are to jointly hold this function.

FIRE EXTINGUISHERS

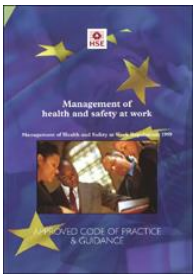
- The fire warden(s) noted above are responsible for ensuring fire extinguishers are on site and in company vehicles (where applicable) and are checked annually. This is carried out with constant information relating to these matters being relayed from the Site Supervisors and/or the designated vehicle drivers.

FIRE ACTION PLAN

- All fire action plans within the office are the responsibility of the Company's fire wardens.
- All fire action plans on site are the responsibility of the Site Supervisor.
- All fire alarms are to be tested quarterly by the designated fire warden or Site Supervisor.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

5.3 Occupational Health Surveillance



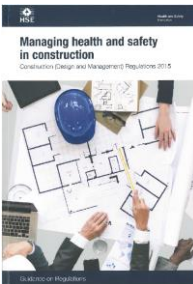
Under Regulation 5 of the aforementioned 1999 Regulations, every employee will be consulted and arrangements made regarding health surveillance, particularly when other statutory instruments require such health surveillance (e.g. the [Control of Lead at Work Regulations 2002](#) (CLAW) and [The Control of Asbestos Regulations 2012](#) (CAR). Annual surveillance will be required when working with or using lead and/or its compounds, work with asbestos-containing materials (ACMs). All operatives exposed to noise and vibration will be tested periodically.

The Company will ensure that employees working with or designated as users of display screen equipment will be ergonomically assessed and appropriate eye tests will be arranged. These tests and examinations will be carried out in accordance with the [Display Screens Equipment Regulations 2002](#).

The Company will ensure that any employee requiring or requesting an assessment, medical and or health surveillance will be assessed and if required appropriate arrangements made. Employees working under the requirements of a specific statutory provision that requires health surveillance will automatically receive the appropriate surveillance and or medical examination. The Director will be responsible for making such appropriate arrangements; the health and safety consultants will assist by giving appropriate advice and guidance. All health surveillance records will be kept in personal files for confidentiality and with the appointed medical advisor in terms of the Data Protection Act 1998.

The persons responsible for ensuring health surveillance is carried out are the Managing Group.

6. CONSTRUCTION DESIGN AND MANAGEMENT



The Company will at all times comply with its duties as determined by the [Construction Design and Management Regulations 2015](#).

The persons responsible for this compliance with the CDM regulations are the Managing Group.

7. CONTRACTOR SELECTION

All contracting companies will have to complete the Contractor Health and Safety Competence Questionnaire, which will then be scrutinised by the Company's Health and Safety Consultant. The Company will award contracts only when it is assured that there is compliance with The Health and Safety Competence Questionnaire. The Company will require all sub-contractors to have, as a minimum, undertaken a standard questionnaire assessment or an assessment with a recognised [SSiP](#) certifying body such as: CHAS, Safe Contractor or other recognised bodies such as Construction Line.



The persons responsible for this section of the policy are the Managing Group.

8. ASBESTOS

Any work that the Company undertakes in an area with potential asbestos present must have the minimum of either a Refurbishment Survey or a Demolition and Refurbishment Survey as per [HSG264](#), the survey guide. The Company does not undertake licensed asbestos removal, and if such asbestos is found, the Company's work must cease immediately.

Only asbestos removal works under the non-licensed and notifiable non-licensed classifications are undertaken by the Company and all works will be carried out in compliance with the Control of Asbestos Regulations 2012, [HSG 210 – Asbestos Essentials](#), and the [National Federation of Demolition Contractors guidance note DRG 103](#).

Notwithstanding the information supplied within the Asbestos Register from the client; should a Company operative discover asbestos or an indication that asbestos is present (that has not been highlighted within the register) all work

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

MUST STOP until the material has been identified and appropriate action has been taken to contain the area / material in question. The Company will ensure that samples are taken only by a trained and competent person.

The persons responsible for this section of the policy are the Managing Group.

9. DEMOLITION

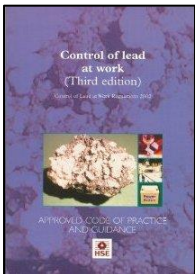


All demolition works undertaken by the company will be carried out in compliance with the BS [6187:2011 Code of practice for full and partial demolition](#), the [National Federation of Demolition Contractors guidance notes](#), and will be accompanied by a full risk assessed method statement as per Regulation-20 of Construction (Design and Management) Regulations 2015.

The Company will ensure that demolition works are only carried out by a trained and competent persons.

The persons responsible for this section of the policy are the Managing Group.

10. WORKING WITH LEAD



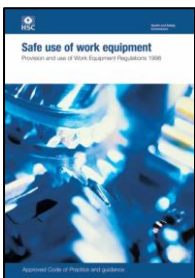
In accordance with the [Control of Lead at Work Regulations 2002](#) there is a requirement to ensure there is a control system in place to ensure all works involving lead have a suitable and sufficient risk assessment carried out.

Where a control procedure has been established, employees will be fully trained and are expected to abide by these procedures for their own safety. Failure to comply will result in disciplinary action. All employees involved with lead must ensure they apply a high standard of personal hygiene and never eat food or smoke without first of all ensuring that they have washed thoroughly. Every effort will be made to engineer a safe working environment with particular attention to good ventilation.

The Company will monitor the exposure of employees to lead on a regular basis and carry out appropriate health surveillance where necessary (See section 4.7). It will also ensure all employees are properly informed, trained and supervised in compliance with the control of lead regulations.

The persons responsible for this section of the policy are the Managing Group.

11. WORK & ELECTRICAL EQUIPMENT, PLANT AND MACHINERY



All plant tools and equipment must comply with the [Provision and Use of Work Equipment Regulations 1998](#) as amended, and [The Electricity at Work Regulations 1989](#) and all other statutory provisions and Approved Codes of Practice (ACoPs).

The Yard Supervisor, acting as the competent person, will ensure that all plant and equipment are maintained in line with manufacturer instructions and legislative standards and that PAT testing is carried out biannually. The Manager is responsible for ensuring all new equipment meets suitable legislative standards prior to purchase.

The Company will ensure that all work equipment, plant tools and electrical equipment are maintained and a record of maintenance is retained. The Yard Supervisor is responsible for ensuring all work equipment, including electrical equipment, office-based equipment and all operatives' tools are subject to planned maintenance and Portable Appliance Testing (PAT). Test periods are set out in the table below.

The Company will keep records of all work equipment and electrical equipment, and those records are the responsibility of the Supervisor. The Supervisor will ensure a competent person carries out all testing of portable equipment within the periods/intervals as set out in the table below or sooner, where the equipment used is subject to heavy usage and conditions likely to damage the equipment or will be subject to wear and tear.

Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

Equipment/Environment	User Checks	Formal Visual Inspection	Combined Inspection and Testing
Battery-operated tools: (Less than 20 volts) Drills, circular saws	Yes	Yes	3 Monthly
Extra low voltage: (Less than 50 volts AC)e.g. telephone equipment, low-voltage desk lights	Yes	No	No
Information technology: e.g. desktop computers, laptop computers, Visual display screens	Yes	Yes Annually	up to 5 years
Photocopiers, fax machines	Yes	Yes Annually	up to 5 years
Double insulated equipment NOT hand held but moved occasionally eg. Fans table lamps, slide projectors	Yes	Yes 6 months – 1 Year	Up to 5 Years
Double insulated equipment HAND held eg, floor cleaners, vacuum	Yes	6 months – 1 Year	No
Earthed equipment (Class 1) Eg. Electric kettles, microwaves, ovens	Yes	Yes 6 months – 1 Year	Yes 1 – 2 Years
Cables, leads, extension leads and plugs connected to the above	Yes	Yes 6 months -1 Year	Yes 1 – 2 Year

NB: Inspection and testing of equipment should also be carried out in the following situations:

1. When there is reason to suspect the equipment is faulty or damaged but cannot be confirmed visually.
2. Any equipment that can be confirmed visually that damage or a fault has occurred.
3. After any repair, modification, or similar work to the equipment and its integrity needs to be established.

The competent person must keep a record of all tools inspected. The supplier and/or hirer of any such equipment will be responsible for the provision of safe tools, plant and equipment, and the Company requires that said equipment be maintained in good condition. The Company further requires that each piece of equipment be supplied with current test certification and records of inspection etc. The failure to supply current test certificates or records of the equipment will render the hire agreement as void and the Company will return the equipment without using it. Any tools or equipment hired or used for the first time by the Company, associated party or employee will be subject to the user or hirer being adequately trained in the safe operation of that equipment. The Company will permit only trained and competent persons to use such equipment. Tools, plant and equipment that is not suitably maintained and of serviceable use, will not be used by the Company, and must be reported to the Supervisor responsible. The work equipment will then be removed from service and a record of this action will be kept within the health and safety file.

11.1 Hand and Power Tools

The hazards associated with hand and power tools are:

- (a) Failure or disintegration of tools
- (b) Proximity to moving or cutting parts.
- (c) Flying particles
- (d) Heat and sparks
- (e) Electric shock
- (f) Crushing or pinching
- (g) Hand Arm Vibration Injuries (HAVs)

The Company notes that tools that are appropriate correct for the job, in a safe condition and used correctly will improve productivity as well as safe working conditions, e.g.:

- i. Wooden handles on tools must be free of splinters or cracks and solidly attached to their working heads. Suitable anti-vibration aids must be fitted to the tools.
- ii. Electric power tools will be 110v only.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

- iii. Electric leads will be maintained free of cuts, abrasions and kinks.
- iv. Tools with exposed moving parts will be provided with guards to minimise exposure to the operator.
- v. All power tools will be stopped and as applicable pneumatic, hydraulic, high-pressure water or electrical supply disconnected to make any adjustments to the tool. All fuel-powered tools will be shut down for re-fuelling.
- vi. Impact-type (percussion) tools will have suitable retainers to hold tool bits in place during operation.
- vii. Extension or leverage increases will not be used on tool handles.
- viii. Tools with 'mushroomed' striking faces must be replaced. If these faces are to be redressed, the tool shall be inspected for cracks and proper temper restored before re-using.
- ix. Grinding wheel and cutting blades' speed and size will be compatible with the speed and power capability of the driving shaft.
- x. All tools will be regularly inspected, repaired and lubricated as required to maintain them in a safe condition. Records will be kept of such inspections.
- xi. Power-activated tools will include safety features that will minimise the possibility of accidental operation.
- xii. Personnel and protective clothing requirements for each type of tool will be established and enforced.
- xiii. Pneumatic / Water / Hydraulic hoses and electrical leads, leading to tools at work areas will be located or covered to protect them from external mechanical damage.

The persons responsible for this section of the policy are the Managing Group.

12. VIBRATION



The Company uses work equipment that can expose employees to potentially harmful levels of vibration. The following tools are examples of such equipment:

- Cut-off saws, reciprocating saws, heavy-duty breakers - HAV
- Crushers, skid steers – WBV

The Company takes its duties to prevent its employees suffering from the effects of Hand Arm Vibration (HAV) and Whole Body Vibration (WBV) very seriously. When such work is required all employees will be fully trained in the operation of such equipment and all work will be carried out in conjunction with the Specific Risk Assessment and Safe System of Work for that specific task. All vibration calculations will be carried out using [BS: 5228-2: 2009](#).

The persons responsible for this section of the policy are the Managing Group.

13. WORKING PRACTISES

The Company is committed to the following general and specific working practices.

1. Employees must not operate any item of plant or equipment unless they have received suitable training and are authorised to do so.
2. Employees must make full and proper use of all equipment guarding. Guards must not be removed.
3. Employees must immediately report to management any fault, damage, defect or malfunction in any item of plant, equipment, implement or utensil.
4. Employees must not clean any moving item or plant or equipment.
5. Employees must not leave any item of plant or equipment in motion whilst unattended unless authorised to do so.
6. Employees under the age of 18 years must not operate any item of plant or equipment unless they have received sufficient training or are under adequate supervision.
7. Employees must not make any repairs or carry out maintenance work of any description unless authorised to do so.
8. Employees must use all substances, chemicals, liquids et cetera in accordance with all written instructions.
9. Employees must return all substances, chemicals, liquids et cetera. to their designated safe storage area when not in use and at the end of the working period.
10. Employees must observe all pedestrian and vehicle controls in force on or off the premises.
11. Employees under the age of 18 years old will be fully supervised at all times.
12. Operatives over the age of 18 years must be supervised when undertaking training or operational awareness.

13.1 Hazard/Warning Signs and Notices

1. Employees must comply with all hazard/warning signs and notices displayed on the premises and at the workplace. Pictorial signage is preferred where possible

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

13.2 Working Conditions/Environment

1. Employees must make proper use of all equipment and facilities provided to control the working conditions/environment.
2. Employees must keep stairways, passageways, work areas and access and egress routes clear and in a clean and tidy condition.
3. Employees must dispose of all rubbish, scrap and waste materials within the working area, using the facilities provided. (see section on waste control – 4.5/4.5.1/4.5.2)
4. Employees must use the correct methods when removing any articles or waste for disposal.
5. Employees must clear up spillage or liquids within the work area in the prescribed manner.
6. Employees must deposit all waste chemicals and other substances at the correct disposal points and in the prescribed manner.
7. Employees must not pollute watercourses, sewers or drains with chemicals, or substances.

13.3 Protective Clothing and Equipment

The Company is committed to compliance with this [Personal Protective Equipment Regulations 1992](#) as amended. In order to demonstrate this commitment, it will introduce hazard elimination risk assessment, and based on the outcome suitable and sufficient PPE will be issued where the control measure indicates the requirements. Suitable training will be provided for the use of the said PPE where required.

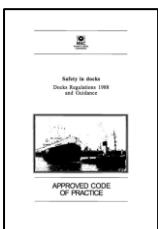
All PPE will be supplied by the Company without charge as required by the 1974 Act and said 1992 Regulations. Received PPE is signed for by the recipient and is understood by the Company to denote proof of compliance with this policy

Personal protective equipment will not be issued as a means of priority control, but may be initiated as an additional control or end-result control.

1. Employees must use all items of protective clothing/equipment provided as instructed.
2. Employees must store and maintain protective clothing/equipment in the approved manner.
3. Employees must report any damage, loss, fault, or unsuitability of protective clothing/equipment to their Supervisor.
4. Any person found to be recklessly interfering with anything provided for health and safety including abusing PPE, will be subject to the Company's disciplinary procedures.

The persons responsible for this section of the policy are the Managing Group.

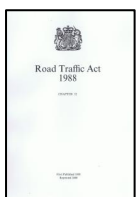
14. WORKING ON OR NEAR TO WATER



The Company will ensure that all work will be undertaken in full compliance, where required, with the Safety in Docks ACoP, and any other relevant legislation. Through the Company's activities, employees may be required to work on or near water, where the probability of harm is significantly increased. Any work falling within this category must only be carried out in accordance with the specific safe system of work, working on or near to water, in-depth hazard elimination risk assessments and full plans of work.

The persons responsible for this section of the policy are the Managing Group.

15. WORKING ADJACENT OR ON THE PUBLIC HIGHWAY



Any work will be undertaken in full compliance with [The Road Traffic Act 1984](#), [Chapter 8 of the Traffic Signs Manual](#) and the [New Roads and Street Works Act 1991](#). The Company will, in conjunction with this, also ensure that the safe system of work and specific risk assessment policies set out above are ensured.

The persons responsible for this section of the policy are the Managing Group.

16. NOISE

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket



Certain tasks undertaken by the Company may involve the generation of excessive noise for the employee. When this situation occurs, if necessary the Company will undertake suitable assessments under the [Noise at Work Regulations 1989](#) as to be amended by the [Control of Noise at Work Regulations 2005](#).

When necessary the Company will ensure that steps are taken to reduce the risk of exposure to its employees and others likely to be affected by such an activity. All noise calculations will be carried out using [BS: 5228-1: 2009](#)

The persons responsible for this section of the policy are the Managing Group.

17. CONFINED SPACE WORKING



The Company undertakes confined space operations whilst working on client's sites. The [Confined Space Regulations 1997](#) regulations define a confined space as: *“Any place, including any chamber, tank, vat, silo, pit, trench, pipe sewer, well or similar space in which, by virtue of its enclosed nature, there arises a reasonably foreseeable specified risk”*. The Company, before undertaking any confined space work, will arrange for suitable and sufficient arrangements for the rescue of persons and the establishment of a Safe System of Work. All work will be in compliance with the Company's Confined Space Entry Permit System. All persons employed in this type of work will be trained in entry and rescue procedures as determined in the said 1997 Regulations.

The persons responsible for this section of the policy are the Managing Group.

18. WORKING AT HEIGHT



The following should be read in conjunction with the [Working at Height Regulations 2005](#), as amended. The Company will, as far as reasonably practicable, reduce the exposure of “working at heights” to its employees. The majority of demolition contracts will be carried out by remote demolition techniques. In the event of a Company employee requiring to work at height, all reasonable steps shall be taken by it to provide a safe working environment for those employees required to carry out their trade or professional skills. In the event of access platforms/equipment of any kind being used they will be erected and operated by fully experienced/qualified person.

The Company shall provide the necessary overall preventive and individual protective measures to prevent falls of persons or materials from the workplace and will liaise with any other persons involved in the work activity. Work equipment/methods that prevent falls from occurring will be devised and incorporated into the works to minimise the risk of falls occurring. Priority will be given to the use of collective/passive protection measures, as they require no action by those working at height to work effectively. Personal measures will only be used where there is no other method to supply protection.

Continual compliance with the Working at Height Regulations will be maintained through instruction, training and supervision of all operatives.

The persons responsible for this section of the policy are the Managing Group.

18.1 Arrangements for Securing the Health and Safety of Workers

The Company will:

- Carry out an assessment of the risks involved in working at height and take steps to eliminate or control them.
- Provide all the necessary equipment to allow safe access to and egress from the place of work.
- Provide suitable plant to enable the materials used in the course of the work to be safely lifted to and stored at the workplace.
- When working at dusk, night or dawn, provide sufficient local lighting, so that work can be carried out safely and access and egress are easily visible.
- Arrange for the regular inspection of all equipment required for working at height, particularly where there is a statutory requirement to do so.
- Appoint a competent person to be responsible for the supervision of the erection, altering and dismantling of scaffolding and for the inspection of equipment used in work at height.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

All scaffolding shall comply with the requirements of The Construction Design and Management Regulations 2015, [BS EN 12811](#) and shall be inspected by a competent person at least every seven days whilst in use, and following alterations or weather conditions likely to affect the scaffolding.

Records of all inspections shall be entered in the Site Scaffolding Register. For further details on scaffolding refer to The CITB Guide to Practical Scaffolding and The Work at Height Regulations 2005.

19. SAFE USE OF ACCESS EQUIPMENT



19.1.1 Scaffolding

The Company's policy is that all traditional tube and clip scaffolding shall only be erected by scaffolders holding a Construction Industry Scaffolders Record Scheme card (CISRS). Only competent persons are to erect, alter or dismantle scaffolding over 5.0m in height. Only trained and competent persons will be allowed to erect, alter and dismantle approved proprietary scaffold systems including easi-deck and ladder deck systems.

19.1.2 Mobile Access Towers

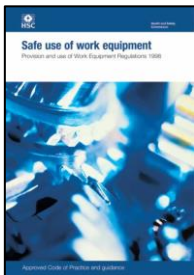
Only PASMA-trained and competent persons will be allowed to erect, alter and dismantle mobile access towers.

19.2 Lifting of persons

Regulation 5 of the above regulations must be complied with at all times. See specific Safe System of Work for this type of work.

The persons responsible for this section of the policy are the Managing Group.

20. SAFE USE OF MACHINERY



The Company commits to ensure that all plant tools and equipment comply with the [Provision and Use of Work Equipment Regulations 1998](#) as amended and [The Electricity at Work Regulations 1989](#). All machinery must have efficient stopping and starting appliances, conveniently positioned, and be properly guarded. It must have clear and unobstructed space; the surrounding floor must be maintained in good condition, free of loose material and must not be allowed to become slippery. Lighting at machinery must be adequate.

The persons responsible for this section of the policy are the Managing Group.

21. MANUAL HANDLING AND LIFTING



The [Manual Handling Regulations 1992](#) as amended require any load likely to cause harm, to be assessed and the risk reduced. The Company will nominate and appoint a competent person to carry out suitable and sufficient hazard elimination risk assessments and introduce control measures and safe systems of work with regard to manual handling.

The Company will strive as far as reasonably practicable to reduce manual handling by the use of mechanical aids, with the following in mind: *"A person shall not be employed to lift, carry or move any load so heavy as to be likely to cause injury to himself"*.

The Company fully understands the need for all employees to be trained to carry out their work in a safe and proper manner. A training programme is in operation as per section 4.1. In addition, Manual handling training will be delivered to every employee who must undertake manual handling operations as part of their allotted tasks - both at the start of their employment and thereafter as refresher training at regular intervals and individuals' capabilities will be assessed.

The persons responsible for this section of the policy are the Managing Group.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

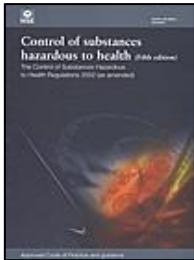
22. MECHANISED MATERIAL LIFTING



The Company will comply with its duties as pre-determined by the [Lifting Operations and Lifting Equipment Regulations 1998](#). Any lifts involving the use of a mobile or static crane will be subject to a suitable lift plan and hazard elimination risk assessment being compiled by a competent person.

The persons responsible for this section of the policy are the Managing Group.

23. INDUSTRIAL HYGIENE, COSHH AND SAFE WORKING PRACTICES



The Company will ensure that all use of chemical products will be subject to good standards of Industrial Hygiene and Safe Working Practices. [The Control of Substances Hazardous to Health Regulations 2002](#) (CoSHH) requires the elimination of hazardous substances and/or the substitution of less hazardous substances. Where this is not possible suitable warnings will be given and control procedures established. Where reasonably practical the Company will be fully committed to this aim.

The hierarchy of control measures is as follows:

- Elimination of exposure;
- Substitution of substance to one less harmful;
- Adequately control the exposure to any substance;
- Monitoring the exposure of employees;
- Health surveillance where assessed as a requirement;
- Training and information to all persons exposed to hazardous substances;
- PPE must only be used as the last resort;

The Company will ensure that no person will be permitted to use any substance unless an assessment has been made of that material and all control measures have been implemented using the hierarchy of controls as listed above. Employees will be issued with specific and generic assessments with regard to the substances used by the Company, detailed advice or assistance on what is desirable or obligatory in this respect may be obtained from the HSE.

The Company will ensure that its employees avoid their skin coming into prolonged or repeated contact with relevant materials. The Company notes that chemicals may present a very low hazard to health in terms of acute or chronic toxicity, whilst being able to cause inconvenience and discomfort by provoking local irritation if prolonged skin contact is permitted. The Company will ensure that protective clothing (as a minimum, gloves, eye protection and overalls) is always worn.

There is a CoSHH manual in which all substances in use are listed, and the risks to health are identified in the ownership of the Company. As a matter of policy, all employees will be made aware of the risks associated with any substances they use or to which they may become exposed.

Where a control procedure has been established, employees will be fully trained and are expected to abide by these procedures for their own safety. Failure to comply will result in disciplinary action.

The Company will monitor the exposure of employees to hazardous substances on a regular basis and carry out appropriate health surveillance where necessary. It will ensure all employees are properly informed, trained and supervised in compliance with the CoSHH regulations. The Company also has in place an emergency CoSHH policy.

23.1 CoSHH/Incident Emergency Policy

The Company recognises its obligations in terms of the 2002 Regulations to ensure that prepared plans and procedures to deal with accidents, incidents and emergencies exist. This will apply where the work activity gives rise to a risk of an accident, incident or emergency involving exposure to hazardous substances which goes well beyond the risks associated with normal day-to-day work. The Company will ensure that **any** accident, incident or emergency relating to the use of materials/products which come under the mentioned CoSHH Regulations will be reported immediately to the management without delay.

Priority 1: Information on what the particular accident, incident or emergency is and if possible details on the

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

substance/product which have been used by the operative or operatives involved with the specific works must be given as soon as is practicable to Supervisory/management personnel. **Only those necessary to deal with the incident may remain in the area and they must be provided with appropriate safety equipment.**

Priority 2: The Company will conduct, where applicable, CoSHH safety drills which will be practised at regular intervals in relation to these regulations.

The persons responsible for this section of the policy are the Managing Group.

24. CHEMICALS IN CONSTRUCTION & REFURBISHMENT



By law, Suppliers and Manufacturers of all materials, chemicals and substances, et cetera. should provide a Hazard Data Sheet. This must also be supplied by the manufacturer and is known as a Manufacturers Safety Data Sheet (MSDS).

Reference to these Data Sheets will identify any specific precautions to be taken for the safe storage and use of the material.

Every container must show whether the contents are:

- Explosive
- Flammable
- Toxic
- Corrosive
- Harmful
- Irritant
- Oxidising

The Company will always seek to use the least hazardous chemicals. The following basic principles will help to ensure safe working:

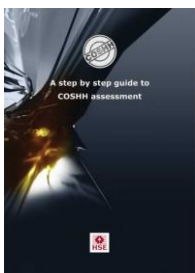
- Inform employees of the hazards that exist and the precautions to be taken.
- Restrict the handling and usage of chemicals to those employees who have given the appropriate information and training.
- Ensure that all managers and Supervisors recognise and understand the hazards, precautions and emergency procedures.

Substances including chemicals can enter the body in any of the following ways:

- Ingestion - eating, drinking, smoking;
- Absorption - through the skin;
- Inhalation – breathing; and
- Injection – splinters, lacerations etc.

The Company will ensure that precautions are taken to prevent ingress to the body.

25. DUST AND VAPOUR HAZARDS



Most chemical products can have some effect on the human system. The Company adheres to the principle that it must therefore follow that sensible precautions should be taken at all times when handling them particularly to ensure that dusts are not generated, for example during normal operations. Some gases and volatile products may have toxic effects and action must be taken to ensure that such products are only used in adequately ventilated situations or equipment, which is correctly designed and controlled to guard against the hazards in question. Any product used must be done so in complete compliance with the CoSHH Assessment and Safe System of Work.

The persons responsible for this section of the policy are the Managing Group.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2025	Stephen McCann	Keith Blasket

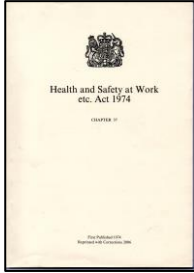
26. BIOLOGICAL HAZARDS



The Company recognises its duty to ensure the Health safety and Welfare of its employees and others in accordance with the 1974 Act and CoSHH Regulations. The Company will ensure that risks from identified biological hazards are assessed and effective control measures are put in place. These risks include those from Leptospirosis (Weil's Disease), HIV/AIDS, Hepatitis (A, B & C), Legionella, Toxocara, etc.

The persons responsible for this section of the policy are the Managing Group.

27. SITE SAFETY – CLIENTS AND OTHER PERSONS



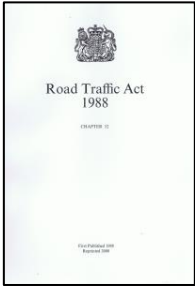
Work on site represents the main circumstances where strict controls are necessary to ensure the health and safety of all those affected which includes clients, client's employees and members of the public. The Company will put in place additional controls for work carried out on domestic premises, working on or adjacent to public highways and pedestrian routes, paying particular attention must be paid to the old, infirm, disabled and children. Irrespective of how small the proposed works are, the Company will comply with all relevant health and safety legislation at all times.

- Where works are carried out in conjunction with the Clients continuing activity, business or otherwise, then careful consideration should be given to the phasing of the works.
 - The need for Clients and Client's staff to enter areas where work is being carried out and vice versa should be minimised and must be strictly controlled by site management, or
 - If the client's premises can be completely closed during any installation works then this should be recommended.
- Assessments of hazard and risk in respect of any work activity that may affect any person will be carried out and appropriate action will be taken and Management will monitor any control measures. Re-assessment will take place as necessary.
- Effective protection controls in the work area, such as fans, barriers, warning notices et cetera will be in place at all times and inspected regularly.
- Information, communication and control measures are essential matters, which need to be discussed with Clients at regular meetings.
- Care in detailing design and inspection of work should be applied to minimise any health and safety risk.
- Such matters as tripping hazards, holes in floor, storage of materials, tools et cetera must be carefully inspected and hazards controlled.
- Potentially dangerous operations, such as cutting, hot works, operatives working overhead etc should be identified early and satisfactory precautions arranged prior to work being carried out.
- Any problems, hazards, risk or unsafe matters identified should immediately be brought to the attention of Site Supervisors for the necessary action to be taken.
- All accidents, injuries and incidents will be reported to site management, recorded as necessary and the appropriate action being taken.
- In the event of an incident, accident to Client personnel or a member of the public, the Safety Adviser will be informed and carry out an investigation and report, if necessary.
- Any Fire Plan provided by the client, in respect of his premises, will be communicated to the Contractor to ensure it is understood and not compromised by any building operations. This matter must be taken into consideration for the Contingency Fire Plan.

The persons responsible for this section of the policy are the Managing Group.

28. VEHICLES

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	6th January 2026	Stephen McCann	Keith Blasket



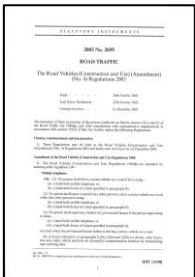
The Company runs a fleet of vehicles, generally, as a means of conducting its business. It is essential that these vehicles are seen as an extension of the professional image of the Company. It is important for the proper and safe functioning of this transport that proper maintenance and care is given to those vehicles; this will protect employees as well as other workers and members of the general public.

Drivers are required to regularly check oil, water and tyre pressure levels in accordance with the vehicle manual and to present their vehicle for servicing at the required mileage. All drivers will be trained in the safe use and operation of the vehicles and will be certificated where appropriate. All operators of such vehicles will at all times when on the public highway abide by the Road Traffic Act and subsequent Legislation.

When operating a vehicle on the site of a client, the vehicle will be operated as to those specific site rules. All vehicles must be kept properly maintained and presentable at all times.

The persons responsible for this section of the policy are the Managing Group.

29. MOBILE TELEPHONES



The Company will not permit mobile phones to be used on-site, other than by the foreman, or in or in exceptional circumstances with consent obtained from management or the Site Supervisor. Furthermore, the Company will not force an employee to use a mobile telephone when driving as part of their duties.

In addition, the Company will inform employees that, under the [Road Vehicles \(Construction and Use\) \(Amendment no 4\) Regulations 2003](#), it is an offence whilst driving to use a hand-held device to:

- Speak or listen to a phone call.
- Use a device interactively to access any sort of data- including internet, text or other images.
- To hold a hands-free phone or other mobile device at any point whilst driving.
- The use of a hand-held device even when stationary (e.g. Traffic Jam, Traffic Lights etc) will remain an offence.

Therefore the Company will promote safe driving for employees by requesting that the use of mobile phones when driving is not undertaken.

Where the use of mobile phones is required, the Company will require employees to:

- Use a hands-free kit and holding cradle for the device.
- Only make or receive calls when the phone is held in the cradle.
- Make a call on a hand-held phone in the event of an emergency (999), if it is unsafe for the driver to stop.
- Keep calls short.
- Inform callers that you are driving and to call back when more convenient.
- Allow the call to go to your message provider.

The above does not require the mobile telephone to be switched off.

The persons responsible for this section of the policy are the Managing Group.

30. LONE WORKING

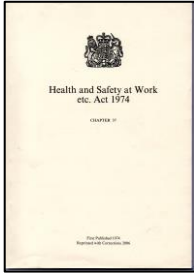
The Company understands that risks can be presented to employees that may have to work alone as part of their job requirements. This may occur at the company premises or when working on-site for a client. The risks from lone working are identified in the risk assessment together with the relevant control measures employed by the Company.

Where high-risk activities are required to be undertaken, it may be determined that lone working is unacceptable.

The persons responsible for this section of the policy are the Managing Group.

31. VIOLENCE AND AGGRESSION AT WORK

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket



The Company recognises that employees have the right to work in safe and healthy conditions in terms of the following:

- [UN Universal Declaration of Human Rights \(Article 3\);](#)
- [European Social Charter 1961.](#)
- [Health and Safety at Work etc. Act 1974](#)
- [Management of Health and Safety at Work Regulations 1999](#)
- [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995](#)
- [Safety Representatives and Safety Committees Regulations 1977](#)
- [Health and Safety \(Consultation with Employees\) Regulations 1996](#)
- [Sex Discrimination Act 1975](#)
- [Equality Act 2010](#)
- [Disability Discrimination Act 2005](#)
- [Protection from Harassment Act 1997](#)

The HSE define Work Related Violence experienced by an employee as:

“Any incident, in which an employee is abused, threatened or assaulted by a member of the public in circumstances arising out with the course of his or her employment”.

It is the policy of the Company to provide all its employees with a safe place of work and that we ensure that our statutory duty of care is applied in all aspects of our working operations. This duty of care also applies to company employees to treat all persons in a fair and respectful manner during working hours. Any employees found to be acting in any aggressive/bullying manner to anyone are considered a danger to our work operations and as such will be subject to instant dismissal.

The Company recognises that people who come into contact with members of the public at any time are at risk from aggressive or violent behaviour. Any violent encounter should be reported to the Site Supervisor or member of management immediately.

The persons responsible for this section of the policy are the Managing Group.

32. FOREIGN LANGUAGE SPEAKERS

Whilst the Company is an equal opportunities employer; it is acknowledged that there are an increasing number of foreign nationals working within the local construction industry some of whom may have difficulty in speaking and/or understanding English (written or verbal).

Thus due to the nature of the industry and the high risks therein:

- The site is deemed to be English-speaking
- All persons who do not have English as a first language must be able to receive English-spoken site communications and instructions. This may be accomplished by means of a competent interpreter being employed within the squad.
- Standards of Safety competence and training are constant regardless of native origin or language spoken.
- The contractor is fully responsible for all additional resources and costs necessary to ensure satisfactory levels of competence and communication capabilities within the workforce.
- Where possible signage and emergency plans will be pictorial.

The persons responsible for this section of the policy are the Managing Group.

33. ASYLUM AND IMMIGRATION VERIFICATION

Information for Employees

All employees are required to provide **original** documentation to prove their eligibility to work in the UK (on the day of the interview wherever possible). Where the checks carried out establish that the prospective employee is not permitted to work, the Company will refuse employment to that person. It is up to the prospective employee to show the Company that he/she is permitted to do the work offered by the Company. Failure to supply documentation prior to the proposed start date will delay the start date and may result in the offer being withdrawn. The Company will accept as verification documents as stated in current Home Office Guidance. It is the responsibility of the employee to determine the nature of the appropriate documentation.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

34. TIME AT WORK



The Company adheres to the requirements of the Working Time Directive by ensuring that there is a limit placed on an individual's working time of forty-eight hours unless otherwise agreed by the individual, and also a limit placed on any night working to average out at eight hours.

34.1 Jury Service and Associated Court Attendance Procedure

Should a Company employee or other relevant party receive notification to attend court for Jury Service or as a witness, the Supervisor or Manager should be informed as soon as possible. If called as a Juror, the Jurors Allowance Form received from the court should be sent to payroll for completion. The completed form will be returned to once processed.

Staff will receive no pay from the Company during a period of Jury Service. It is the Juror's responsibility to claim such loss of earnings compensation from the relevant authority.

Jurors may be able to claim for:

- ✓ Compensation for loss of earnings from the court for Jury Service.
- ✓ Compensation for loss of earnings from the Defence Solicitor (if appearing as a defence witness).
- ✓ Compensation from the police (if appearing as a prosecution witness).

The persons responsible for this section of the policy are the Managing Group.

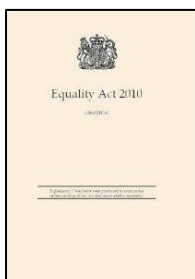
35. STRESS

The HSE defines stress as the *“Adverse reaction people have to excessive pressure or other types of demands placed upon them?”*. This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress which can be determined to be detrimental to health.

The Company is committed to protecting the health, safety and welfare of their employees and recognises that workplace stress is a health and safety issue and acknowledges the importance of identifying and reducing workplace stressors.

The persons responsible for this section of the policy are the Managing Group.

36. EQUAL OPPORTUNITIES



The Company operates an equal opportunities policy, meaning that all employees are selected and treated on the basis of individual merit and will not be discriminated against in any way on the grounds of:

- Sex
- Marital or Parental status
- Physical Handicap
- Colour
- Race
- Ethnic origin or nationality
- Any other reason than the ability to do their work
-

This Equal Opportunities Policy complies with all relevant legislation (including the [Equality Act 2010](#) and the [Disability Discrimination Act 2005](#)). This means that the Company's policy ensures people's differences will be accepted; it also prevents a minority group from being given an unfair advantage.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	6th January 2026	Stephen McCann	Keith Blasket

36.1 Sex Discrimination Policy Statement

The Company is committed to developing an environment that is inclusive, fair, open and welcoming of individuals irrespective of their sexual orientation or gender, and it values the principles of equality and diversity and respect for individual differences. In addition, the Company recognises that many individuals and communities experience unlawful and unfair discrimination and oppression on the grounds of their sex, sexual orientation, and gender. We consider such discrimination unacceptable and will not tolerate it in any form.

The Company is aware of the existence of homophobia and heterosexist assumptions in society, and aims to create an environment in which all staff whatever their sexuality, feel equally welcome and valued, where staff experience fairness and equity of treatment, and are treated with dignity and respect.

36.2 Disability Policy

Objectives

- To provide equal opportunities for disabled persons in recruitment, promotion, and training;
- To ensure that all staff are aware of the Company's policy on the employment of disabled persons;
- To ensure that where possible disabled persons are provided with equipment and facilities to enable them to carry out their duties
- To provide a safe working environment for disabled staff;
- To ensure that the special needs of disabled staff, arising directly or indirectly because of their work, are met.

Recruitment

- Every vacancy will be open to suitably qualified disabled persons subject to safety considerations;
- All vacancies will be notified to the local Disability Employment Advisor in the Jobcentre connected with people with disabilities, and will contain a statement that suitably qualified persons will be considered.

Duties and working conditions

The duties and responsibilities of disabled employees will be reviewed periodically in light of any changes in their condition.

Training

Disabled employees will be given full and fair consideration for inclusion in training programmes.

Rehabilitation

If a disabled employee is unable to continue carrying out existing duties every effort will be made to find suitable alternative employment within the Company with re-training being provided if necessary. (This would automatically apply to other Company employees who become disabled.)

(The services of a Disability Employment Adviser will be sought to help disabled employees)

The persons responsible for this section of the policy are the Managing Group.

36.3 Race Relations Policy Statement

It is the policy of the Company not to discriminate against any person on grounds of their colour, race, nationality or ethnic origin. This applies not only to employees, but to job applicants, customers, and suppliers of the public. The Company requires all its employees to treat all people with appropriate courtesy and respect, regardless of their colour, race, nationality or ethnic origin.

Any person who suffers or believes that they have suffered unlawful discrimination is to report this to their immediate superior or the other member of the Company's management and as that the matter to be dealt with. If it is not resolved to their satisfaction they may take the matter up through the Company's grievance procedure and ultimately with the Director if the problem persists.

All personnel are hereby instructed that unlawful discrimination in contravention of the above policy will not be tolerated and will be dealt with as a disciplinary issue. This includes anyone who becomes aware of discrimination is taking place but does not report it to his or her immediate superior or an appropriate member of management.

Employees are to note that a joke is only a joke if the person on the receiving end thinks it funny. Some people, often for good reason, are more sensitive than others to remarks about their colour, nationality or racial ethnic origin: if it is more apparent that so-called jokes give rise to offence the perpetrator is to desist and if appropriate apologise for any offence that might be caused. Supervisors and those responsible have a duty to ensure that all concerned are made aware of this policy.

It is illegal (i.e. a criminal offence) to incite racial hatred and any employee who does so or participates in or condones any such action, will be subject to disciplinary action.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

This policy applies to employees not only whilst at work but also in their own work activities, insofar as these relate to employees, customers or suppliers of the company or as regards an effect on employees' relationships in the workplace or the Company's public relations.

The persons responsible for this section of the policy are the Managing Group.

36.4 Recruitment Policy

New employees are recruited via a variety of means. To assist this process, Fastsource Ltd operates a standard company recruitment procedure which is implemented by senior members of staff (normally a Director or Senior Level Manager) who is responsible for the recruitment in their sphere of activity. All recruitment and selection activities will be carried out in a fair, consistent, effective and professional manner in accordance with company procedures and protocols.

The Company is committed to applying its equal opportunities policy at all stages of the recruitment process and selection, and therefore, No employee or potential employee shall receive less favourable treatment or consideration during the recruitment and selection process on the grounds of race, colour, religion or belief, nationality, ethnic origin, sexual orientation, gender, age, disability, marital status or part-time status or will be disadvantaged by any conditions of employment that cannot be justified as necessary on operational grounds.

Publicising the Vacancy

All posts will initially be advertised internally. This will give an opportunity for current staff to apply for an internal transfer to another office or post within the Company. Any internal applications should be made to the HR Department in the first instance. Any application or enquiry will not be detrimental to the applicant by accepting or declining another position. When a vacancy arises, consideration will be given, prior to open advertising, to any staff for whom redeployment is being sought on the grounds of redundancy or disability.

Recruitment Process

The recruitment process should be followed in accordance with the following steps:

- Authority to recruit must be granted by a Director before advertising a vacancy.
- A job description and person specification should be produced with full details of the position, tasks, reporting line, responsibilities of the jobholder and number of subordinates, if applicable. The skills, experiences, qualifications and competencies of the jobholder should be laid out in the person specification.
- Job advertisements will be based on the job and person specifications and/or competency profile.

Internally Advertised Vacancies

Internal vacancies will be posted on company notice boards.

External Advertised Positions

A variety of advertising mediums will be used. Positions may be simultaneously advertised internally and externally.

- The organisation may utilise the services of agencies when recruiting permanent individuals. These agencies follow the organisation's standards laid down in this and the Equal Opportunities Policy.
- In circumstances where recruitment agencies are utilised as part of the process, they will be issued with copies of the relevant job descriptions and person specifications. Monitoring of their adherence to these standards will take place on an annual basis. Managers should not contact agencies without the prior approval of a Director.
- Applicants are encouraged to apply via email but hard copies of applications are also acceptable.
- All external applicants will be pre-screened by the HR Department. All applicants that meet the specified criteria will be referred to the relevant recruiting Manager. Internal applicants' details will automatically be sent to the recruiting Manager.
- All interviews should consist of at least two interviewers.
- Recruiting Managers should ensure that all details are collected.
- A question sheet will be designed by the recruiting Manager based on the job description and person specification/competency profile, and the outcome recorded in writing.
- All interview documentation must be returned to the HR department for secure storage. Only those members of staff that require access for specific and authorised purposes will be able to access this information.
- Upon selection of a suitable candidate the recruiting Manager will liaise with the Director and the HR department to identify the appropriate starting salary, the director must approve all offers before they are made to successful candidates.

The HR department will handle all offers to successful candidates.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

- All offers are subject to two satisfactory references, medical clearance (site workers only) and a check on relevant qualifications and eligibility to work in the UK.

The recruiting Manager will apply for and verify all references, which will be requested once applicants have indicated acceptance (subject to the conditions highlighted above). References will ideally come from a current or a previous employer, If the references received and or medical clearance are not satisfactory, the offer may be revoked.

New Employee Induction

This will start as soon as a candidate accepts a position. HR will send out a copy of the written statement of terms and conditions of employment and all related new starter documentation that requires to be completed. All new starters will receive a timetable for their successful induction into the organisation.

Pre-employment checks

A number of employment checks require to be undertaken before a formal offer of employment can be made. It must be ensured that any offer of employment given, is a 'provisional' one, subject to satisfactory receipt of documentation as prescribed below.

References

References should only be used after interview to confirm, but not influence, a decision. The candidate's permission must be sought prior to seeking references. Appropriate referees are those who have direct experience of a candidate's work, education or training, preferably in a supervisory capacity and a reference must be obtained from the current or previous employer. References are confidential and must be sought 'in confidence'. Interviewers must return all copies of any references with the CV's and their interview notes to the HR Department upon completion of the recruitment process. All such references will be retained in their personal file.

Asylum and Immigration

Under this act it is a criminal offence to employ someone who does not have the permission to work in the UK. All candidates must therefore be requested at the interview stage to provide proof of citizenship, by presenting a document indicating the person's name and NI number, for example, a current passport or an NI card together with their birth certificate. Note that it will be unlawful racial discrimination to carry out checks only on potential employees who by their appearance or accent seem to be other than British. Checks must be carried out on all applicants.

Qualifications

Proof of academic qualifications and any others considered essential for the post must be verified.

Appointment

Only the HR Department will issue letters of appointment.

Record Keeping

In accordance with the General Data Protection Regulations, all records relating to the recruitment and selection procedure will be retained only for as long as is necessary (generally 6 months) and will be securely destroyed thereafter.

The persons responsible for this section of the policy are the Managing Group.

37. BULLYING AND HARASSMENT POLICY

It is the Company's policy to support the right of all people to be treated with dignity and respect at work, and the Company notes that workplace bullying and harassment has a detrimental and negative effect on individuals and therefore operational efficiency. Accordingly, the Company is committed to making every effort to provide a working environment free from bullying and harassment. In particular, this includes abusive or offensive behaviour or actions with regard to gender, race, sexuality, disability, religion or age.

All matters relating to any part of this policy are to be treated in the strictest confidence, given the sensitivity of such matters. This applies whether at an informal level, or in obtaining relevant information at investigatory or disciplinary stages. Any breach of confidentiality may involve disciplinary action against those responsible.

DEFINITION: What is "bullying" and "harassment"?

This policy recognises the wide range of possible situations which might be encountered in the workplace, from 'innocent' or inadvertent behaviour, which nevertheless offends, through to more serious cases of deliberate and persistent bullying or harassment.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

Bullying or harassment is when an individual is subject to actions or comments which the recipient views as demeaning or unacceptable. It is generally agreed these can be a persistent pattern of behaviour or a single incident if it is sufficiently serious. Acts of bullying or harassment may be regarded as being imposed by one person or a group of people.

The actions may not always be face to face, but can be via the telephone, written correspondence, e-mail, or any medium which results in an adverse effect on the individual's job performance, personal safety or well-being. Bullying or harassment is offensive, abusive, intimidating, malicious or insulting behaviour, or perhaps unfair use of sanctions. It can make the recipient feel upset, threatened, humiliated or vulnerable, undermine self-confidence and affect their dignity. The behaviour is unsolicited, fails to respect the rights and dignity of others, and in doing so it also fails to recognise the impact that the behaviour or actions may have. Conduct which may amount to bullying or harassment is often not intended to cause offence but occurs because of a lack of awareness of other people's feelings.

Examples of Bullying & Harassment

This list is included to indicate some examples of bullying or harassment covered by this Policy (it is not an exhaustive list)

- Physical: unwanted physical contact or intimidation, including unnecessary touching, patting or brushing against another employee, assault, coercing sexual behaviour, physical threats, insulting or abusive behaviour or gestures.
- Verbal: remarks about appearance, derogatory or lewd comments, innuendoes, persistent name-calling, statements which are suggestive, unwelcome, abusive and offensive.
- Behaviour: that denigrates or ridicules; intimidatory or physical abuse; making threats; attempts to stir up hatred against an individual or group.
- Other: display or circulation of material (posters, magazines, calendars) which are sexually or racially offensive or degrading.

The following list gives more specific examples of behaviour which may amount to bullying or harassment, it is not exhaustive:

- Humiliating or ridiculing others about their work
- Ordering others to work below their level of competence for no reason
- Removing areas of responsibility without consultation
- Spreading rumours or gossip
- Ignoring or sending others to 'Coventry'
- Shouting
- Pointing your finger, invading personal space, shoving, blocking or barring the way
- Suggesting that others should leave the organisation
- Being hostile to others
- Constantly criticising others' work and efforts
- Ignoring the views of others
- Playing practical jokes on people you don't like
- Setting unreasonable tasks or deadlines
- Making false allegations against others
- Engaging in excessive monitoring of the work of others
- Unreasonably obstructing an individual's progress at work by blocking promotion or training opportunities without a genuine business reason
- Causing embarrassment by disciplining staff in public
- Deliberate misrepresentation of the views of senior management and misuse of position

What is not "bullying" or "harassment"?

There is a need for employee performance to be managed in order to bring about the aims of the Company, and this policy does not seek to diminish a Manager's ability to do this. Legitimate and constructive fair criticism of an employee's performance or behaviour at work is not bullying or harassment. It is also recognised that an occasional raised voice or argument does not constitute bullying. However, it is unacceptable to condone bullying behaviour under the guise of a particular management style. Effective management obtains results whilst ensuring that employees are treated with dignity and respect.

If an employee feels bullied or harassed:

In the first instance, and wherever possible, the Company encourages employees who feel they are recipients of harassment/ bullying to resolve the matter informally and directly with the person concerned. It is acknowledged that the harasser/ bully may be an employee's direct Line Manager. If this is the case (and a direct approach is not possible) the

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

employee should approach the next Manager. In these circumstances, all references in this procedure to "the Manager" should be regarded as that next person in the supervisory chain.

- **Actions for employees**

The first step should be that the employee should consider talking to the person causing offence and explain how it is making them feel. They should make it clear that they consider that the persons' behaviour is unacceptable and then ASK THE HARASSER TO STOP. Ask someone else to be present if preferred. It is important to write down what was said and/or what has happened as soon as possible. If, for example, there is a subsequent repetition, the record will be helpful if the employee decides to raise the matter formally. If the employee feels unable to do this, they should ask someone they trust to raise it on their behalf. The offending behaviour may be unintentional and the person may be unaware of the effect of their behaviour on the other party.

The Company encourages staff to alert their Manager to the problem (where it is appropriate and feasible) so that he/she can give advice and/or monitor the situation. The employee may choose to inform another nominated officer.

The employee may feel that it would be helpful to talk it over with someone. They may therefore wish to discuss the incident(s) with a work colleague, Line Manager, or a Contact Officer (see below) who can act either as a "listening ear" or give advice on measures which can be taken to resolve the situation.

- **Actions for Line Manager**

In all cases the Manager should approach and check if the employee is aware or has experienced any of the actions defined as bullying or harassment. They should ensure the individual is directed to a copy of this policy and check if they are aware of how to make a formal complaint. If an employee does not wish to make a formal complaint, the matter must be kept confidential but it is advisable that the Manager monitors the situation.

If the Manager feels that some action needs to be taken, they must intervene at this informal stage to attempt to resolve the situation, yet where possible, still maintain the employee's wish to remain anonymous. Where a Manager believes that an incident requires a further investigation they may initiate a formal investigation. Following investigation the Manager will decide in his/her view whether the complaint is justified and what course of action is appropriate.

If the decision of the Manager is that the complaint is justified, a formal disciplinary hearing may be convened in accordance with the Disciplinary Code.

Some interim action may be necessary to allow normal work to resume. Such action should not disadvantage the complainant. It may be necessary to relocate the alleged harasser for the duration of the investigation or, reorganise the work so that close or regular contact between the two is avoided; in serious cases suspension of the alleged harasser (on full pay) could be possible.

If required the Manager may continue to support the employee in making the complaint including the disciplinary stage. However, the responsibility to pursue the complaint rests with the individual employee. The Manager must decide whether harassment has occurred and if they consider there is a case to answer, the formal Disciplinary Procedure will be invoked. The complainant must be advised of this decision.

38. ETHICAL CONDUCT POLICY

The Company will respect and uphold the rights of every employee, and will act in ways that ensure that everyone, regardless of circumstance, is treated with dignity and consideration. The Company is committed to creating an environment that will foster mutual trust, openness and respect, and everyone who works for the Company will be treated fairly and without discrimination. The Company is an equal opportunity employer, and will recruit, promote and reward employees on the basis of merit alone. The Company also respects the right of employees to join associations of their own choice.

The ethical principles to which the Company adheres are to be promoted by its employees to those with whom they do business. The Company will respect the rule of law, all customs and norms and act in good faith. The Company places a high value on its reputation, and will act in ways that embody the highest standards of personal and professional ethics in every element of its business. The Company will carry out business with integrity, honesty and openness, and respect the different cultures and the dignity and rights of individuals in its operations. The Company will not use child labour in its operations or in the provision of services.

Personal responsibility is encouraged at the Company. Individuals are expected to exercise judgment in a manner consistent with the Company's values. Employees are accountable for their actions. However, the Company strives to be a responsible company and to act in ways that are beneficial to the quality of life in the communities where its employees

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

live and work. Where appropriate, the Company will seek to be involved in activities that will contribute to the social and material development of the individuals who work for the Company.

The Company will ensure that it acts in ways that demonstrate a responsible approach to environmental sustainability. It will also ensure that it makes use of technologies and promotes practices that minimise its environmental impact.

38.1 Anti-bribery policy

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the company rules that must be adhered in order to ensure that no bribery occurs within the company.

Unacceptable behaviour

The following behaviour is unacceptable, and must not occur in this Company:

- Accepting any financial or other reward from any person in return for providing some favour;
- Requesting a financial or other reward from any person in return for providing some favour; and
- Offering any financial or other reward from any person in return for providing some favour.

Business gifts

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item, or something of considerable value. All gifts, however small, must be reported to the head of department and recorded. No gifts with a value of more than One Hundred Pounds may be accepted. If a gift is offered and then refused because of its value, this must be reported to a director.

Hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to the directors.

Permission must be given by your immediate Manager before an employee accepts any invitation.

Offering gifts and hospitality

It is this organisation's custom to offer small gifts to customers, suppliers and other persons. If a gift is authorised by the directors, the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts.

This organisation occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. An employee must not organise any additional hospitality event without seeking authority from a director.

Responsibilities of immediate Managers

Immediate Managers are responsible for keeping a record of all gifts and hospitality that are offered and/or received by employees working in their department's area of responsibility. If immediate Managers are concerned about any actions, they should contact a director immediately for advice.

Immediate Managers are also responsible for ensuring that all their employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Expenses

Immediate Managers must authorise all expense claims from their employees. They are also expected to check and sign all expense claims from their employees against receipts. Any items of expenditure that give rise to concern should be fully investigated.

Attempts to bribe

Any employee who is concerned that he or she is potentially being bribed should report this matter to his or her immediate Manager.

Donations to organisations

The Company makes regular donations to charity. These are managed by the Board of directors. No employee should make donations to a charity without the approval of the Board of directors.

No donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

Disciplinary action

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

Raising concerns

If an employee is concerned that acts of bribery are occurring in the Company, they should inform their head of department in the first instance. If this course of action is inappropriate, the employee should inform another Senior Manager.

38.2 Modern slavery policy

The Company has:

- Made our staff aware of the Modern Slavery Act, including its definitions of slavery and human trafficking
- Told staff what to do if they suspect a case of slavery or human trafficking
- Contacted suppliers in potentially higher-risk categories to check what assurance arrangements they have in place
- Commenced a revision of our procurement contracts and related documents to include prohibitions in respect of slavery and human trafficking and in compliance with legislation; and
- Reviewed our Whistle Blowing Policy

The above procedures are designed to:

- Identify and assess all potential risk areas
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Monitor potential risk areas
- Provide adequate protection for whistle blowers

This statement is made pursuant to section 54(1) of the [Modern Slavery Act 2015](#)

39. COMPANY GRIEVANCE POLICY

Definition

If an employee has a grievance or dispute concerning their employment, the Company will reach an agreement sensitively, fairly and promptly.

Scope

This Company Grievance Policy applies to all Company employees.

Objectives

- To enable the Company to deal with grievance issues sensitively and in a consistent, fair and professional way.
- To provide a framework for employees to raise concerns about their work, working environment or working relationships and for these to be dealt with before they develop into major problems.
- To reflect Best Practice.
- To proactively manage the number of claims brought against the Company.
- To foster good employee relations

Principles

This policy will be applied in accordance with the following principles.

- Any grievance raised will be fully investigated and individuals will be provided with a copy of the investigation report in good time prior to any meeting.
- All grievances raised will be treated seriously and will be investigated in a timely manner in accordance with the procedure.
- Line management will be responsible for managing each stage of the procedure and will be supported by a Managing Director or General Manager (whoever is appropriate) where required. However, in certain circumstances, where it is not appropriate for line management to be involved, the Managing Director or General Manager will manage the procedure. If at any stage, an individual does not feel it is appropriate to discuss the issue with their Line Manager, they should contact their Human Resources department.
- Individuals should present their grievance in person, but have the right to be accompanied by a colleague or union representative at all stages of the procedure. They do not have the right to be accompanied by anyone external, with the exception of a union representative. The Company recognises that judgment needs to be exercised in some cases.
- Notes will be taken during each stage of the process and copies distributed to all parties. The outcome of each stage of the grievance procedure will be confirmed in writing and will clearly state what the individual can do if they are unhappy with the decision.

GUIDELINES

Grievance Procedure

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2025	Stephen McCann	Keith Blasket

If an individual has a grievance relating to their employment or an issue at work, they should use the following procedure:

Stage 1 – in the first instance individuals should discuss their grievance with their Line Manager. The Line Manager will investigate the issue fully and make every effort to resolve it at this level.

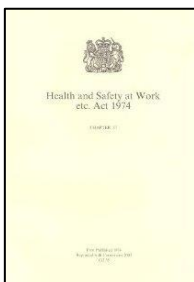
Stage 2 – if the grievance is not resolved or no action has been taken within five working days of the first meeting, individuals should put the issue in writing, stating details of the grievance and that they wish to refer it to the next level of management. The relevant Manager will then arrange a meeting for the individual to explain the issue in more detail and will undertake a full investigation.

Stage 3 – if the grievance is not resolved or no action has been taken within five working days of the meeting, the individual should write to the next level of management, with a copy to a Managing Director or General Manager. They should state the details of the grievance, that Stages 1 and 2 have been exhausted and that they wish to pursue the issue further. A meeting will then be arranged within five working days and a full investigation will be undertaken. The outcome of this meeting will be the final decision under the company grievance procedure.

Roles & Responsibilities

Role	Responsibilities
Line Manager	<p>The Manager will carry out initial investigations to ascertain the facts and where possible seek to resolve an employee dispute without it being necessary for an employee to seek recourse through the formal grievance procedure.</p> <p>Managers are responsible for ensuring employees are aware of the policy as a means to resolving a dispute if all other attempts at resolution have been exhausted. Managers are also responsible for taking timely and appropriate action as a consequence of a grievance being raised.</p> <p>Managers will notify employees in writing at each stage of the grievance process taking advice from a Managing Director or General Manager as appropriate. When an employee raises a formal grievance in writing to their Line Manager, it becomes the Line Manager's responsibility to arrange a meeting to consider the case with the appropriate person.</p>
The Managing Group	<p>Reviewing the policy in the light of changes that might affect the Company as a result of legislation, directives and codes of practice.</p> <p>Providing advice and guidance on the application of the policy.</p> <p>People Services will issue the grievance policy to all members of staff through the Company Intranet.</p> <p>The Managing Director or General Manager will keep a written record of all correspondence relating to an employee grievance including minutes of hearings.</p> <p>In the case of a "final stage" grievance hearing, the Managing Director or General Manager will attend the hearing together with another Senior Manager.</p>

40. CHILDREN AND VANDALISM



When working on client's sites or within domestic premises, the Company will take all necessary steps to prevent children from gaining access to the work areas at all times. Appropriate measures will be taken to ensure the work site may not be utilised as a play area, and so as to prevent vandalism. The occupier of the premises (i.e. the main contractor on most normal sites) is responsible for the safe conduct of its business on that site including the prevention of accidents and injuries to the public, even though they may be trespassing.

Within domestic premises on completion of the day's work, the Company will ensure that work areas should be left safe and secure as not to prevent a hazard. On every site whether enclosed or open to the public (e.g. large housing sites, road works, etc.) it is becoming increasingly necessary to take precautions to prevent vandalism, damage and injury to the public.

Particular attention will be given by the Company, where necessary, to the guarding or covering of excavations and manholes, etc., immobilisation of company vehicles equipment, security of Domestic Gas Supply, security of electricity

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

supply, security of Liquefied Petroleum Gas Supplies, other hazardous substances and prevention of access to working platforms, access equipment and the interior of buildings.

The persons responsible for this section of the policy are the Managing Group.

41. OFFICE SAFETY RULES

All Company office staff have a duty to assist in minimising the risk of accidents, ill health and fire.

The following rules are to be observed:

- Tripping hazards will be minimised by properly storing materials, limiting trailing electrical cables, closing filing cabinet drawers, keeping staircases and fire exits clear.
- Avoidance of manual handling: Where it has been assessed that there is a risk of injury from manual handling, the first consideration should be whether the load needs to be handled at all, or whether the requirement for handling can be minimised by using safe methods of manual handling, i.e. the use of mechanical aids. In all cases, a suitable and sufficient risk assessment will be carried out in accordance with the regulations.
- Chemical hazards will be minimised by the correct labelling and storage of cleaning and other harmful materials or substances.
- Fire hazards will be minimised by keeping fire doors closed, fire extinguishers in place, paper and other flammable materials tidy, use of ashtrays in smoking areas, and other control measures identified in the Fire Risk Assessment complied with.
- Electrical hazards will be minimised by ensuring that all cables and connections are sound, equipment is earthed and correctly fused, sockets are not overloaded and that water is kept away from all electrical installations. Electrical equipment shall be subject to regular checking, annually, and taken out of service if a fault is identified or suspected. The inspection and servicing to be carried out by a competent electrician and no unauthorised person will install, repair or tamper with electrical equipment. All such inspections shall be recorded.
- Risk Assessments are to be completed as appropriate. A set of general risk assessments are available.

OFFICE HOUSEKEEPING RESPONSIBILITIES

Cleanliness

The relevant Manager is responsible for the general cleaning of the office together with cleaning the kitchens and the toilets.

Waste disposal

The office staff are responsible for emptying their own buckets and putting contents into waste disposal containers provided. The waste disposal container is to be emptied once a week.

Kitchen

It is the responsibility of all staff to ensure that the kitchen is kept in a sanitary condition.

Cleaning Equipment

It is kept in the cupboard next to the safe no other type of materials shall be stored here.

Fire

See section 5.2.0 Fire and emergency arrangements

Toilets

It is the responsibility of all staff to ensure that the toilets are kept in a sanitary condition.

Safe Stacking and Storage

Office area, all filing cabinets must be left closed. Boxes must not be stacked too high.

Marking and keeping clear Gangways, Exits etc

All doors must be marked up with appropriate signs for action. Keep workplaces and exit routes tidy and free from obstruction.

Checking Office Equipment

In the event of a breakdown, only suppliers/authorised repairers should attempt to effect repairs. No items of equipment should be left in a place, which could be deemed dangerous.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2025	Stephen McCann	Keith Blasket

Yard and Associated Areas

All Company operatives will ensure at all times that the yard is kept as clean as is reasonably practicable ensuring safe access and egress in the event of fire or any other hazard that requires evacuation of the workplace.

Visitors/Disabled

All visitors are required to be signed, in and out of the premises. Meeting hosts are responsible for ensuring that their visitors know what action to take in the event of a fire alarm or incident. Meetings held with disabled persons should be held specifically in the reception room. Meeting hosts should act as a “buddy” when they have a visitor with special needs and ensure they are assisted in the event of a fire alarm or incident.

The persons responsible for this section of the policy are the Managing Group.

42. DRUGS AND ALCOHOL

42.1 Alcohol

The Company acknowledges that alcohol misuse has become an ever-increasing problem in society affecting all types of businesses and occupations, and that this can have disastrous consequences for individuals, their families and in certain circumstances members of the general public. In addition, the Company has specific statutory responsibilities towards their employees, the public and employees of other organisations working on the company’s premises, property or on clients’ premises or property.

The policy will apply to all employees, external contractors and agency staff, whose misuse of alcohol or drugs, in the opinion of the company, interferes with their work, their performance or ability to do their work and relationships with work colleagues. The policy does not cover social drinking outside of working time, although the effects of heavy drinking are known to have an effect on the following day’s ability to operate a motor vehicle and any other machinery or plant.

Any persons found under the influence of alcohol or discovered consuming alcohol during working hours will be treated as Gross Misconduct under the company’s disciplinary procedures and due to the nature of the industry and the risks to others posed, may result in the immediate dismissal of the employee

The persons responsible for this section of the policy are the Managing Group.

42.2 Drugs

The Company operates a zero-tolerance approach to the consumption or possession of drugs of any class as defined in the [Misuses of Drugs Act 1971](#). Any employee found to be taking or in possession of any such drugs will be subject to the Company’s disciplinary procedures.

This policy does not apply to the taking of drugs prescribed by a medical practitioner or purchased over the counter. However if the taking of such drugs has an effect on the employee to carry out his normal duties safely, he must inform his direct Supervisor (see 3.1).

Rules:

- Alcohol must not be consumed during working hours (including breaks) either on or off the company or clients premises.
- Illegal drugs from the above list must not be consumed / taken during working hours (including breaks), either on or off the company or clients premises.
- Any breach of the above rules will be treated as Gross Misconduct under the company’s disciplinary procedures and due to the nature of the industry and the risks to others posed, may result in the immediate dismissal of the employee.

The persons responsible for this section of the policy are the Managing Group.

43. SMOKING

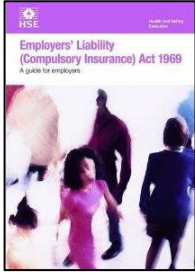


Smoking is prohibited on the site, company’s and client’s premises as per the [Health Act 2006](#). Where work is being carried out on-site, a smoking area will be identified during the site induction. Failure to comply with this policy, may well result in disciplinary action being taken as determined by the employees' terms and conditions of employment.

The persons responsible for this section of the policy are the Managing Group.

44. INSURANCE

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket



The [Employers Liability \(Compulsory Insurance\) Act 1969](#) requires employers to take out and maintain with authorised insurers approved insurance policies against bodily injury or disease sustained by employees in the course of their employment. The Company will adhere to this requirement. Damage and injuries sustained by persons other than employees of the Company are covered by Public Liability Insurance. All steps will be taken to protect those not employed on the site including visitors and the general public. All visitors to the site are to be made aware of safety procedures on site and protective clothing issued.

The persons responsible for this section of the policy are the Managing Group.

45. ADVICE AND CONSULTANCY

LOCAL HEALTH & SAFETY EXECUTIVE OFFICE:

**The Lateral
8 City Walk
Leeds
LS11 9AT**

TELEPHONE NUMBER:

0300 003 1747

HSE INFORMATION LINE:

0870 952 8222

HSE WEBSITE:

www.hse.gov.uk/hsehome.htm

RIDDOR HOTLINE:

0845 300 9923 (8.30 –5.00 pm)

RIDDOR REPORTING WEBSITE:

www.riddor.go.uk

RIDDOR FAX:

0845 300 924

RIDDOR EMAIL:

riddor@natbrit.com

46. PAYMENT TO SUPPLIERS AND SUB-CONTRACTORS

It is the Company's policy to agree on payment conditions with all suppliers/sub-contractors to ensure that payment is made promptly and no later than 30 days from receipt of the invoice submitted in respect of the goods or services provided by the supplier or sub-contractor.

The persons responsible for this section of the policy are the Managing Group.

47. CUSTOMER SERVICE POLICY

The Company aims to put the customer at the top of its agenda, and its customer service policy sets out what this commitment means in practice.

The Company is committed to providing excellent services that offer value for money. The key to achieving that vision is a good relationship with customers. Different services will have different customers but it is important that each is treated to the same high-quality response. This policy and the standards within it apply to everyone.

It is important that customers know what to expect from the Company in terms of service so that they can measure whether their needs have been met. From the perspective of the employer, the Company provides a wide range of services. It is important that all Company staff understand and deliver the same high-quality service irrespective of the part of the Company that they work within.

Our Customer Charter:

The Company promises to:

- Act in a professional manner and be polite at all times.
- Deal with enquiries promptly or explain the reason for any delay.
- Listen to customers and ask for their views.
- Keep its promises.
- Be open, honest and explain decisions.
- Apologise when it makes a mistake, and take steps to put things right.
- Accept the customer's right to complain, and guarantee a full investigation and considered response.
- Treat customers and their property with respect.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

The Company encourages customers to:

- Give the Company all the information it needs to assist customers.
- Treat all employees appropriately and with respect.
- Allow it to improve its services by providing views and suggestions.

The Company encourages customers and staff to inform an employee if it is not conforming to this Charter.

Our customer standards

The Company aims to:

- Answer the phone within five rings.
- Avoid using answering machines during working hours.
- Return calls within one working day.
- See customers within five minutes even if no appointment has been made.
- See customers within fifteen minutes of an appointment time. If the Company is not able to conform to this, an explanation will be given and an alternative meeting time proposed.
- Reply to letters and faxes within ten working days.
- If a query can't be resolved within ten days, the Company will contact customers to explain why and to provide a timescale for resolving the question.
- Respond to complaints within 15 working days.
- Adhere to timescales set out in the Company's complaints procedure.

Other commitments:

- Resolution of queries at the first point of contact, or the provision of contact details for a party who can assist.
- Communicate in plain language, providing interpreting and translation services when required
- Ensuring that office facilities and events are accessible.
- Display the opening times of reception areas and adhere to them.
- Provide information on waiting times or offer appointments for certain services if customers choose not to wait.
- Respect privacy, offering private areas for discussion if required.
- Provide identification on request.
- Have well-trained and confident staff that have the skills and knowledge to do the job.
- Treat private homes with respect.

Unacceptable customer behaviour includes:

- Verbal abuse including racist, sexist or discriminatory comments.
- Threats of any kind (threatening behaviour or intimidation).
- Physical violence.
- Acting under the influence of controlled drugs or alcohol.

The Company will monitor this policy by ensuring that

- It is easy for customers to make a complaint, comment or suggestion
- Monitoring complaints to ensure that mistakes are learned from.
- Publicising customer standards within the Company and to customers.
- Monitoring Company performance against these standards.
- Training and supporting Company staff to provide better customer service.

48. CONSULTATION WITH EMPLOYEE POLICY

The Company recognises its duty under the Health & Safety (Consultation with Employees) Regulations 1996 to consult with all its employees. The Company generally act as representatives of employees as defined in these Regulations. It will carry out regular health and safety meetings with all staff together with the dissemination of information via notice boards et cetera. There will also be regular consultations with the company safety representatives.

All consultations will be in good time with regard to the following:

- The introduction of any measure at the workplace, which may substantially affect the health and safety of the employees.
- The employers' arrangements for appointing or, as the case may be, nominating competent persons to assist him in health and safety matters as required by the regulations.
- Any health and safety information he is required to provide to the employees.
- The planning and organisation of any health and safety training he is required to provide the employees.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

- The health and safety consequences for the employees of the introduction of new technologies into the workplace.

Site Supervisors / Safety Representatives Meetings

The Company will hold a formal meeting on a monthly basis, or more often if necessary. These meetings will be attended by the HSQE Manager, Director, Managers, Site Supervisors and selected members of the workforce as deemed appropriate. The Site Supervisors are involved as safety representatives generally as required by the said Regulations.

The main agenda item will be Safety, Health and Environmental (SHE) Issues. This includes but is not limited to:

1. SHE performance in the previous period – accidents, dangerous occurrences, near misses etc.
2. Appropriate corrective actions (generally immediate) and preventative actions (generally long-term, including lessons to be learned).
3. Effects of new/amended legislation on Company operations.
4. The SHE management structure and any suggestions for improvement.

Actions required will be documented and used as an informal action plan as part of the continual improvement process.

Tool Box Talks

Tool Box Talks will be held weekly on all sites with attendance being compulsory for all employees and sub-contractors.

Tool Box Talks generally are:

1. A Health & Safety/Environmental refresher/reminder on appropriate issues and topics.
2. The forum where the Site Supervisor can identify issues raised by the Company Management and related issues.
3. The forum where employees and sub-contractors can raise any Health & Safety or Environmental issues.

These concerns may be addressed either locally by the Site Supervisor or Company-Wide by the Manager. This may be after formal review and/or discussions with other Site Supervisors and senior personnel.

Tool Box Talks are documented formally and held in the site H&SE construction phase folder.

Induction

The Company will carry out inductions which fall into two basic categories.

- **Company Induction**

All employees receive an induction into the Company. This provides information relating to the Health & Safety and Environmental Policies and Requirements. Integrated Management Systems, Terms of Employment, Personal safety, Health & Environmental Responsibilities, consultation/suggestions etc.

- **Project Specific Induction**

This is to explain the details of the task/area-specific method statement and related risk assessments. All personnel and sub-contractors are required to sign the Safety Induction register and Method Statement register to confirm receipt of their induction and understanding of the method statement and associated risks.

48.1 Industrial Relations Policy Statement

The success of the Company is largely reliant largely upon the commitment, productivity and capability of its employees. The Company's relationships with employees are based upon commercial realities in conjunction with key issues including health and safety. Under no circumstances will the Company risk the health and safety of any employee for the sake of generating revenue.

All work relations matters will be treated with sincerity and in a prompt and professional manner. Central to the efficient management of industrial relations issues is:

- Compliance with all applicable industrial laws, regulations, statutory obligations, awards, agreements, and National and State codes of practice and guidelines.
- Acceptance that the properly held interests of our clients may prevail, and accordingly it is the client who in many cases determines actual industrial relations arrangements.
- Provision of fair and equitable management of work issues and an expectation of the same from all other interested parties.
- Recognition of our employees' entitlement to representation in accordance with awards and agreements.
- Maintaining open relationships with employees and any elected representatives, and with other interested parties.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

The persons responsible for this section of the policy are the Managing Group.

49. QUALITY POLICY STATEMENT

It is the Company's policy to provide products and services in accordance with the requirements of [ISO 9001: 2015](#), and with the customer's requirements.

The policy will be implemented through a series of documented quality procedures and training programmes to ensure all personnel are competent and have a thorough understanding of their responsibilities. The policy is subject to continuous improvements and to review during the Company's annual Management Review Meetings to ensure that our organisational goals continue to meet the current and future anticipated needs of our Customers. Copies of the Quality Policy and associated procedures are made available at all locations which are relevant to the tasks being performed.

The Quality System demonstrates through objective evidence, conformance with customers' requirements, and provides the necessary information to improve quality, costs and service performance. To ensure that the system is efficiently implemented, consideration is given at regular meetings to the required resources for equipment, materials and personnel.

The Company's Manager(s) are committed to the achievement and maintenance of a high standard of service, and the provision of quality products, and are aware that this is not possible without the whole-hearted co-operation of all personnel.

This policy is fully authorised by the Company's Director(s).

50. FAIRLY TRADED GOODS POLICY



The Company will try to source all plant, goods, materials and labour from local suppliers where possible within a 30-mile radius. In addition, the Company agrees with the principles of fairly traded goods and recognises the need to ensure better prices, decent working conditions, local sustainability and fair trade for workers in the developing world.

Fair Trade addresses the injustices of conventional trade, which traditionally discriminates against the poorest and weakest producers, and the Company supports the Fair-Trade Foundation, which is a development organisation committed to tackling poverty and injustice through trade. All Company employees will be made aware of the principles of fairly traded goods.

As much as possible, the Company will purchase goods displaying the fair trade mark and Certification.

51. RESPONSIBLE FOREST PRODUCTS PROCUREMENT

The Company is committed to the responsible procurement of forest products, and its long-term intention is to source all forest products that are procured directly (or procured directly by sub-contractors acting on the Company's behalf) from well-managed forests which have been certified to credible certification standards. This commitment will be realised through a step-by-step approach to responsible procurement which utilises the best available techniques and information.

Where practicable all timber products used within the Company business will be recycled from demolition materials, and be re-used as a priority.

The Company will not source forest products from:

- Forests or forest product suppliers that do not comply with all relevant national and international legislation relating to the trade in forest products.
- High Conservation Value Forests where these are recognised nationally or regionally, unless these forests are progressing towards credible forest certification in a time-bound, stepwise and transparent manner.
- Protected areas, parks or other areas where harvesting operations are not complementary to responsible forest management.
- Forests which are currently being converted to other land uses, or forests that have been converted since 1994.
- Forests which are in areas of armed conflict or civil unrest where there is a direct relationship between the forest products trade and the funding of such conflicts.
- Timber species classified as threatened by the [IUCN \(World Conservation Union\)](#)

To ensure that these goals are achieved the Company will :

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	5th January 2025	5th January 2026	Stephen McCann	Keith Blasket

- Scrutinise all suppliers of forest products for all direct purchases of forest products, and those procured on our behalf by sub-contractors, in all new construction activities.
- Seek information as to the source of all forest products prior to purchasing.
- Clearly communicate the Company's intention to purchase FSC timber where possible in any relevant paperwork.
- Clearly communicate to clients the Company's timber procurement policy and risks to them if this policy is not adhered to on contracts.
- Continually encourage the integration of all tiers of the Company supply chain with transparency of timber sourcing throughout the chain the eventual aim.
- Evaluate this information against the stated policy.
- Continuously improve the level of compliance against these policies, with annual reviews, reports and actions agreed with our suppliers.
- Circulate the Company's timber procurement policy to all suppliers of timber and timber products.
- Work with and encourage suppliers and forest sources who are actively engaged in a SMART process of commitment to credible certification (such as WWF Producer Group members)
- Encourage all suppliers and installers of timber and timber products to seek FSC Chain of Custody.
- Work with key stakeholders (subcontractors, consultants, clients, WWF and all Company employees) to ensure that best practice is followed.
- Set annual, publicly communicated targets regarding the Company's performance.
- Actively monitor and police the policy.

The Company will abide by all local, state and national laws and international conventions (including but not limited to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), World Heritage Convention (WHC), and the Convention on Biological Diversity (CBD) as well as moratoria on logging, declarations of protected areas, forestry laws, environmental protection legislation, as well as labour and social laws.

The Company will never knowingly become involved in, collude with or procure timber from illegal logging operations. The Company will work with our supply chain to ensure that all forest products originate from forests where there is full legal and verifiable title to the land and the harvester has all relevant and current permits and approvals; ensuring products are extracted with full authorisation of those holding rights to the land or forest resources, and with the required authorisation, permits and approvals from all relevant government agencies.

52. DISCIPLINARY PROCEDURE

In order for the Company to maintain high standards in the delivery of our operational services, customer service / care and health and safety & Environmental matters, it has adopted a formal procedure for dealing with misconduct by employees. In cases of misconduct, the Company's disciplinary procedure will normally apply.

This procedure is intended only as a statement of policy and management guidelines and does not form part of a contract of employment. The disciplinary procedure enables the Company to take appropriate action against employees whose performance or conduct is considered unsatisfactory. However, the Company will abide by a number of principles to ensure that anyone subjected to disciplinary action receives consistent and fair treatment.

Any complaint made against an employee will be fully investigated and no disciplinary action will be taken until the employee has been informed of the nature of the complaint and been given the opportunity to respond.

A formal meeting will be held with the employee to investigate the reasons for taking disciplinary action against them at every stage of this process, as set out below. The employee has the right to be accompanied by a work colleague or an employee representative of his or her choice at any disciplinary or appeal meeting. The Company will make all reasonable efforts to ensure that the employee in question is present at his or her disciplinary hearing, but in the case of absence exceeding seven days, the hearing may be held in the employee's absence. In that case, the employee may make written representations.

The outcome of disciplinary meetings will be confirmed to the employee in writing. The Company will at all times use its best endeavours to keep all details relating to any disciplinary investigation or procedure confidential. The employee's Manager or the Company Secretary will deal with minor problems but if the matter is more serious the following procedure will be utilised:

Please note: that the Company reserves the right to implement any stage of the procedure set out below without first following prior states if an employee's misconduct is considered sufficient to warrant such action.

Stage 1 - Verbal Warning

If an employee's conduct or performance has been unsatisfactory, a formal verbal warning will be given. The employee will be informed of the reason for the warning. The employee will be advised of his or her right to appeal. A note of the

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	5th January 2026	Stephen McCann	Keith Blasket

verbal warning will be kept on file but will be considered “spent” for disciplinary purposes after a period of 6 months unless otherwise specified.

Stage 2 - Written Warning

If a serious disciplinary matter occurs or if there has been a failure to improve following a previous verbal warning, an employee will be given a formal written warning. The written warning will give details of the complaint, the improvement required from the employee and the period in which it has to be achieved. It will also warn that a final written warning may be issued if there is no satisfactory improvement within the required period and will advise of the right to appeal. A note of the warning will be kept on file but will be considered “spent” for disciplinary purposes after 12 months, unless otherwise specified.

Stage 3 - Final Written Warning

If there is insufficient improvement following a written warning or if there is misconduct that is serious enough to warrant only one written warning, a final written warning may be given to an employee. This will give details of the complaint and will warn that dismissal, or some other action short of dismissal, may result if there is no satisfactory improvement within a specified period. It will also advise of the right to appeal. A note of the warning will be kept on file but will normally be considered “spent” for disciplinary purposes after a period of 12 months, unless otherwise specified.

Stage 4 - Dismissal

If an employee fails to meet the standards required, or if there is gross misconduct, dismissal will normally result. A decision to dismiss can only be taken by the Director.

As an alternative to dismissal and at the Company’s discretion, the Company may demote an employee. If the Company is considering dismissal, demotion, or any other action short of dismissal, the employee in question will be given a written statement prior to the formal disciplinary meeting, setting out the reasons for the proposed course of action. During the meeting, the issues will be fully discussed and the employee will be informed in writing of the outcome. If an employee is dismissed, he or she will be provided with written reasons for dismissal, the date of termination of employment, and details of any notice pay to which the employee is entitled. The employee will also be informed of his or her right to appeal. If the employee is demoted, he or she will be entitled to the salary and other terms and conditions of employment appropriate to the position to which he or she has been demoted. The employee has a right to appeal against a decision to demote.

Gross Misconduct

If gross misconduct is alleged against an employee, the Company may suspend him or her on full pay pending investigation of the matter. The employee will be given a written statement prior to the formal disciplinary meeting, setting out the reasons for the proposed course of action. The issues will be fully discussed at the meeting and the employee will be informed in writing of the outcome. If, following investigation and after a full disciplinary meeting, the Company is satisfied that there has been gross misconduct, the outcome will normally be summary dismissal without notice or payment in lieu of notice.

The following is a non-exhaustive list of examples that are normally regarded as gross misconduct:

- Theft, fraud, deliberate falsification of records
- Physical violence including fighting and assault on another person
- Deliberate damage to company property or property belonging to any employee
- Incapability through alcohol
- Abuse of drugs
- Refusal to undergo a medical examination at the Company’s request
- Negligence which causes significant loss, damage or injury to other employees or company property
- A serious act of insubordination
- Serious failure to follow the health and safety rules of the Company
- Failure to notify the Company of a serious and immediate danger to health or safety
- Serious misuse of the Company’s computing, telephone or postage facilities
- Sexual, racial or disability harassment
- Disclosure of confidential information
- Dishonest use of the Company's property or name
- Bringing the Company into disrepute
- Failure to follow Company rules when driving a Company vehicle, or your own vehicle, or driving without proper insurance or whilst disqualified when on Company business

The employee has the right to appeal against any warning, demotion, suspension or disciplinary dismissal within five working days, and he or she should give written notice of the intention to do so to the Director or Company Secretary.

Fastsource Limited - Health, Safety & Environmental Policy				
Revision No:	Date:	Next Review Date:	Author:	Authorised by:
0	6th January 2025	6th January 2026	Stephen McCann	Keith Blasket

The employee will be informed in writing of the date of any appeal and he or she will be entitled to bring a colleague or an employee representative with him or her to the appeal hearing. The Director may decide the matter at the hearing or adjourn the hearing for further investigation or further consideration. The employee will be informed of the outcome of any appeal hearing in writing as soon as possible, the decision of which is final.