

The Vitec Group plc

Group Health and Safety Policy Statement – May 2020

The Vitec Group plc (the “Group”) is committed to ensuring the safety, health and welfare of all of its employees and contractors, and others who may be affected by its activities.

This policy statement reflects the key elements of the Group Health and Safety Policy (Appendix 1) and sets out the requirements for all the Group’s sites and businesses (Appendix 2), which remain bound by both local and international law.

Notably, it has been updated to reflect the COVID-19 pandemic (including safe working in the workplace and working from home).

The Group operates businesses in multiple regions, and carries out activities in Research and Design, Manufacturing, Assembly, Product Servicing and related administration activities. Safety management systems are developed and implemented to encompass all of the business units, with the common aim of safe management and operation.

Management at each site must take into consideration any local health and safety legislation and statutory obligations, but as a minimum standard the site is expected to fulfil the requirements of the Group Health and Safety Policy and Policy Statement along with any additional Divisional, Business Unit or site requirements. The allocation of specific health and safety responsibilities to individuals (or by reference to job roles) within the Group are described in the health and safety management systems at each site. The Group operates on the premise that health and safety and compliance with health and safety legislation is the responsibility of all employees and contractors.

To meet this requirement the Group Policy Statement is signed by the Responsible Senior Person (who is normally a member of the Divisional Leadership Team or the Business Unit CEO) and the Responsible Site Manager. Business objectives are defined, reviewed and communicated to businesses annually. Taking into account the Vitec Group Health and Safety Policy, each site commits to the development and continual improvement of site specific safety management systems in order to achieve business objectives.

The Group’s general statement of policy is to, as far as is reasonably practicable:

- Implement control systems which identify and manage risks, including those arising from internal activities, contractors, visitors and related service providers. This includes the implementation of effective precautions and controls in order to prevent where possible, or otherwise mitigate, the risk to the health and safety of all persons, and to prevent health and safety hazards from materialising.
- Provide and maintain safe and healthy working conditions for all employees, contractors and visitors to sites, for the prevention of work-related injury and ill health.
- Implement measures that fulfil legal and other requirements, and are appropriate for the purpose, size and context of the organisation and to the specific nature of health and safety risks.

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- Promote co-operation between all departments and personnel within the organisation.
- Define effective chains of communication, both internal and external to business operations.
- Provide suitable welfare facilities accessible by persons with specific individual needs.
- Provide plant and equipment that is safe and appropriately maintained.
- Ensure all employees and contractors are competent to carry out their tasks and to give them appropriate training.
- Provide employees with the equipment and information to work from home safely. During the COVID-19 epidemic, ensure that operations are conducted in full compliance with regulatory guidelines.
- Carry out all health and safety training during paid working hours, with any costs met by the business unit.
- Monitor the effectiveness of safety management systems, utilising an effective system of reactive monitoring and proactive methods, including audits and reviews.
- Ensure that plans are developed and tested for the response to identified foreseeable emergencies.

All employees and contractors are expected to;

- Take reasonable care of themselves, colleagues and others who may be affected by their acts or omissions.
- Play an active role in creating a positive health, safety and welfare culture.
- Report promptly all accidents and near misses in the workplace (including working from home) and to facilitate root cause analysis of accidents and near misses.
- Work together, to maintain a safe and healthy work environment.
- Comply with all information, instruction and training received by the Group, Division or business unit.
- Meet legal duties put upon them through local or international law.

Review of this policy will be undertaken annually, or earlier should the operations of the Group significantly change.

Signed: _____
Responsible Site Manager

Date: _____

Print name: _____

Signed: _____
Responsible Senior Person

Date: _____

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Print name: _____

Appendix 1: Vitec Group Health & Safety Policy (see page 4)

Appendix 2: List of Sites / Businesses and Responsible Senior Manager

Site Name and Location	Responsible Site Manager	Responsible Senior Person
Vitec Head Office, Richmond, UK	Stephen Bird	Stephen Bird
Vitec Imaging Solutions SpA, Feltre, Italy	Enrico Grando	Nicola Dal Toso
Vitec Imaging Solutions HQ, Cassola, Italy	Nicola Dal Toso	Nicola Dal Toso
VIS UK, Ashby, UK	Neil Martin	Chris Carr
VID Japan, Tokyo	Harumi Ikesu	Akihisa Inaba
VID US, Upper Saddle River, USA	Rocco Zeppetella	Chris Carr
VID China, Shanghai	Troels Persson	Chris Carr
VIS Hong Kong, Hong Kong	Kevin Crandall	Nicola Dal Toso
Lowepro Huizhou, China	Sophia Wang	Nicola Dal Toso
VID Hong Kong, Hong Kong	Kevin Crandall	Chris Carr
VIS India Liaison office, Mumbai, India	Mukul Kashyap	Chris Carr
VID Melbourne, Australia	Matthew Harper	Chris Carr
Rycote, Stroud, UK	Simon Davies	Nicola Dal Toso
JOBY Shenzhen Office, China	Adam Tang	Nicola Dal Toso
Syrp, Auckland, New Zealand	Chris Thompson	Nicola Dal Toso
VPS Bad Kreuznach, Germany	Juergen Sommer	Alan Hollis
VPS Beijing, China	Audrey Chang	Alan Hollis
VPS Bury St. Edmunds, UK	Mike Dowson	Alan Hollis
VPS Cartago, Costa Rica	Julio Lizano	Alan Hollis
VPS Chatsworth, USA	Halid Hatic	Alan Hollis
VPS Garching, Germany	Juergen Sommer	Alan Hollis
VPS Genevillier, France	Sergio Brighel	Alan Hollis
VPS Osaka, Japan	Hiroyuki Taira	Alan Hollis
VPS Shelton, USA	Xavier Arias	Alan Hollis
VPS Singapore	Audrey Chang	Alan Hollis
VPS Tokyo, Japan	Takashi Hino	Alan Hollis
Autoscript, Twickenham, UK	David Fader	Phil Beckett
Camera Corps, Byfleet, UK	Phil Beckett	Phil Beckett
Teradek, Irvine, USA	Milton Stone	Nicol Verheem
Teradek (CSLA showroom), Burbank, USA	Milton Stone	Nicol Verheem
Teradek Ukraine, Odessa, Ukraine	Alexander Farennikov	Nicol Verheem
SmallHD, Cary, USA	Michael Cole	Nicol Verheem
RTMotion, Stroud, UK	Kris Bird	Nicol Verheem
Wooden Camera, Dallas, USA	Elizabeth Schorman	Nicol Verheem
Amimon, Tel Aviv, Israel	Uri Kanonich	Nicol Verheem

Appendix 1

Vitec Group
Health and Safety Policy

Date of Issue: 14 May 2020

Version 1.14

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1. Scope

This policy defines Group-wide guidelines to help prevent accidents and work-related ill health, and provides guidance for the adequate control of health and safety risks arising from work-related activities.

2. Introduction

It is an important duty of all business units in the conduct of their operations, to provide a safe and healthy working environment for all of their employees.

Each business unit needs to take the right precautions in order to reduce the risks of workplace dangers and provide a safe working environment. With regards to employees working from home, section 7 identifies the key measures which must be adopted.

An effective health and safety policy requires the full collaboration and co-operation of all employees.

3. Definitions

Accident is a work related occurrence, which leads to injury or ill health and usually requires first aid or professional medical treatment and leads to either no absence, or absence from work.

Accident Greater than three (3) working days

Non-fatal work place injury, leading to absence from work of more than three (3) days. (Excluding the day of the accident but including everyday thereafter).

Accident Less than or equal to three (3) working days

Non-fatal work place injury, leading to absence from work of three (3) days or less. (This also includes zero day lost time accidents).

Near misses

Non-fatal work place accident that does not result in an injury, but had the potential to do so. Only a fortunate break in the chain of event(s) prevented an injury. Examples of near misses are:

- A person nearly being hit by a fork lift truck as it comes round a corner; driver driving too fast and not looking where he was going;
- Item falling from a shelf/machine and nearly hitting a person;
- A person slipping/tripping in the workplace having caught foot on loose carpet/tile etc.;
- A person tripping over items left on the floor without injury.

Hazard

Anything that may cause harm.

Risk

The chance, high or low, of a person being harmed by a hazard, and how serious the harm could be.

Work Place

Company premises (including company vehicles), third party sites (e.g. relating to installation or off site engineer work) and business travel during working hours. *Note:* See section 7 Driving at work.

4. Manage the risks

Each business unit must manage the health and safety risks in the workplace. To do this each business unit needs to make an assessment about what, in its workplace, might cause harm to people, the potential severity of that harm and what the risk of this taking place might be. This is known as a risk assessment. Once the risks have been identified, each business unit needs to decide how to control them and put the appropriate measures in place to mitigate these risks.

A risk assessment is about identifying sensible measures to control the risks in the workplace. It is not expected of the business unit to remove all risks, but to protect people by putting in place measures to control those risks. Specific procedures relating to COVID-19 are highlighted in the appendix.

5. Training and information

Everyone who works for the organisation needs to know how to work safely and without risks to health. Clear instructions, information and adequate training must be provided to all employees including sub-contractors and contractors.

Each business unit must ensure that everyone has information on:

- hazards and risks they may face in the workplace;
- measures in place to deal with those hazards and risks;
- how to follow any emergency procedures (including evacuation of premises);
- how to report near misses and accidents in the workplace;
- their responsibilities to their colleagues in relation to Health and Safety.

Each business unit must make sure that training is relevant and effective.

Training should take place during working hours and any costs incurred are to be paid by the business unit. A record of all training given and undertaken by employees should be maintained.

Some employees may have particular training needs, for example:

- new recruits;

- people changing jobs or taking on extra responsibilities;
- health and safety representatives;
- people doing work which has been identified as carrying a higher risk or potentially high severity of injury in the event of an accident (e.g. requiring use of permit to work systems, working alone, working in confined spaces, working on live electrical equipment, roof work etc.)

It is important that each business unit assesses the skills required to carry out all the tasks safely and arrange for access to sound advice and help.

Each business unit should also ensure that managers, supervisors and team leaders understand their responsibilities and have the time and the resources to carry these out. Everyone should know what they must do and how they will be held accountable.

6. Provide the right workplace facilities

Each business unit must protect the health and safety of everyone in the workplace, including people with disabilities, and provide welfare facilities for its employees.

Basic facilities should be considered as outlined in the non-exclusive list below.

Welfare facilities

- toilets and hand basins, with soap and towels or a hand-dryer;
- drinking water;
- a place to store clothing (and somewhere to change if special clothing is worn for work);
- somewhere to rest and eat meals.

Health issues

To have a healthy working environment, make sure that there is:

- good ventilation – a supply of fresh, clean air drawn from outside or a ventilation system;
- a reasonable working temperature (usually at least 16°C, or 13°C for strenuous work, unless other laws require lower temperatures);
- lighting suitable for the work being carried out;
- enough room space and suitable workstations and seating;
- a clean workplace with appropriate waste containers.

Safety issues

To keep the workplace safe each business unit must:

- properly maintain its premises and work equipment;
- keep emergency exit, fire extinguishers, floors and traffic routes free from obstruction;
- have windows that can be opened, and cleaned safely;
- make sure that any transparent (e.g. glass) doors or walls are protected or made of safety material;

- provide personal protective equipment (PPE) to employees who may be exposed to a health or safety risk while at work except where and to the extent that such risk has been adequately controlled by other means which are equally or more effective.

7. Employees working from home

Health & Safety law applies to work activities at home in the same way as it does to all work activities at Group sites.

Employers have a duty to provide employees who are working from home with laptops, mouse and keyboards.

Regular advice is communicated in writing and verbally to employees in terms of specific work conditions at home encompassing:

- Workstation management and posture, including the requirement to set up laptops on a firm surface with a solid chair;
- Employees are reminded to take breaks away from the screen at regular intervals to reduce ergonomic concerns.

Line Managers should maintain regular contact with the employees to satisfy themselves of the employees' physical and mental wellbeing.

Injuries or any near misses for employees working from home should be reported in accordance with the health and safety reporting guidelines. Absences must be discussed and reported as normal to line management, and employees must be reminded that standard confidentiality and data protection measures apply.

8. Driving at work

Health & Safety law applies to work activities on the road in the same way as it does to all work activities at Group sites. Employers have a duty to manage the risks to drivers as part of Health & Safety arrangements. Health & Safety law does **not** apply to people commuting to their normal place of work (i.e. between home and their usual office/factory site), however it does apply to those employees who drive for their occupation (i.e. van drivers delivering product to customers or sales reps), employees driving to a meeting with a client at a third party site, or an employee driving to another Group site that is not their normal place of work.

Any motor vehicle accident or near miss whether resulting in an injury or not and whilst on Company business, must be reported in accordance with the Group Health & Safety Policy.

All employees who drive their own vehicles on Company business or drive a Company vehicle for their job must ensure that they take reasonable precautions when driving, including but not limited to:

- You must have a valid driving licence and a copy of that licence should be retained on your HR file;
- If driving your own vehicle on Company business, you must ensure that it is appropriately insured for business use and that it is taxed. The Company's motor insurance policy does not cover personal vehicles while used on Company business.
- You must ensure that the vehicle you are driving is road worthy, regularly serviced and has a valid MOT certificate if necessary.
- You must drive in accordance with driving regulations – observing speed limits and with due care and attention.
- You do not use a hand held mobile phone whilst driving.
- You do not smoke whilst in a Company vehicle.
- You do not drive whilst under the influence of alcohol or drugs.
- You do not drive if excessively tired – you have regard to the amount of hours you have been awake and that you are fit, alert and able to drive – especially if driving a vehicle in a foreign country after a long period of travel.
- You take sensible precautions when driving – having regard to factors such as adverse weather conditions, time of day, lighting and other road users.

If you are involved in a road traffic accident whilst on Company business, as far as possible you should ensure that: you give full details to the other parties involved; take their details, pictures of the accident and names of witnesses if possible; do not admit any liability for the accident; you comply with directions from road traffic Police; and that you report the matter in accordance with this policy.

9. First Aid

There must be first aid arrangements in each business unit workplace. Each business unit is responsible for making sure that its employees receive immediate attention if they become ill or are injured at work. Accidents and illness can happen at any time and first aid can save lives and prevent minor injuries from becoming major ones. The arrangements will depend on the particular circumstances in the workplace and each business unit needs to assess what the first aid needs are.

At a minimum, each business unit must have:

- a suitably stocked first aid box;
- an appointed person to take charge of first-aid arrangements;
- information for all employees giving details of first aid arrangements.

Each business unit should appoint a first-aider. This is someone who has been trained by an approved organisation and holds a qualification in first aid at work or emergency first aid at work.

10. Reporting Accidents (see also Appendix 14)

Each business unit must report and keep a record of injuries, accidents and cases of work-related diseases and near misses.

Keeping records will help each business unit to identify patterns of accidents and injuries and to put in place the controls to prevent these from happening again. Insurance companies may also require inspection of accident records if there is a work-related claim.

The process to be followed to report accidents is outlined below.

For all accident categories and near misses

- The number of accidents and near misses that have occurred must be reported on a monthly basis by Finance following internal communication from Operations as follows:
 - in MPC as part of the normal month end reporting process;
 - in the Divisional Monthly Reports, including figures and a short commentary;
 - in the Group Monthly Reports to the Board.

Additional reporting for accidents Greater than three (3) days

- Must be reported within 24 hours of occurrence (or on immediate knowledge that this has developed into a Lost Time Accident) to the relevant superior, Operations Director and BU Director. The Operations Director has to report it within 24 hours, to the Divisional or Business Unit CEO, Group CEO, Group Company Secretary and Group CFO, as well as to the local enforcing authority within the Country as required by local law.
- Must be reported in the Divisional Weekly Report by Finance following prompt internal communication from Operations.
- A fully completed and signed 8D Accident Report Form (Appendix 15) must be submitted by Divisional Operations, the designated H&S Competent Person for the site, to the Group CEO, Group Company Secretary, Group CFO and Group Finance Team as well as Divisional or Business Unit CEO, CFO and Finance within seven days of occurrence.
- These accidents are reported externally in the yearly Group Annual Report & Accounts.

Importance of timely and accurate reporting

- Accurate, reliable and timely reporting is vital to effective decision making

- It is particularly important that every step is taken to prevent accidents at all locations.
- Where accidents do happen, they need to be reported accurately and in a timely manner.
- Investigations and corrective and preventive steps need to immediately follow all accidents and near misses.
- Information must be retained operationally for divisional analysis, implementation of corrective steps and future prevention activities.

It is important that:

- Business units collaborate with each other to drive improvements in incident preventions and achieve consistent reporting of near misses.
- There is an adoption of KPIs that are consistent across business units and Divisions.
- The effectiveness of the Health and Safety policy is linked to personal objectives (where applicable).
- Health and Safety is always included in any acquisition's integration plan.

Communication between Ops and Finance

Is it extremely important to ensure that good communication links between Operations and Finance are in place and have been tested. This will ensure that accidents and near misses are accurately reported in time in MPC, and that the supporting files are consistent across the Group.

Effective internal procedures and controls must be put in place locally to deliver accurate and timely accident and near misses reporting. Corrective and preventive actions must follow all such accidents and incidents.

11. Audit and Review

The effectiveness of the Health and Safety process should be periodically reviewed, paying particular attention to:

- The degree of compliance with health and safety performance standards (including local legislations);
- Areas where standards are absent or inadequate;
- Injury, illness and incident data – analyses of immediate and underlying causes, trends and common features.

Monitoring provides the information to review activities and decide how to improve performance. Audits by internal employees or third parties complement monitoring activities by investigating if the Health and Safety policy, organisation and systems are actually achieving the right results.

It is important to combine the results from measuring performance with information from audits to improve the approach to health and safety management.

Emergency plans (such as fire evacuation) should be tested at least annually, or more frequently if required by law.

12. Divisional / Business Unit Operations Responsible Persons

- | | |
|--------------------------|-----------------|
| 1. Production Solutions: | Alan Hollis |
| 2. European Services: | Phil Beckett |
| 3. Imaging Solutions | Nicola Dal Toso |
| 4. Creative Solutions: | Nicol Verheem |

The Divisional / Business Unit Operations Responsible Persons are required to nominate a Responsible Senior Person for each Divisional Business Unit workplace. The Responsible Senior Person will be accountable for implementing all relevant aspects of the Group Health & Safety policy within his/her Business Unit workplace, and monitoring compliance with the Policy.

The list of first aiders should also be maintained at Divisional level.

For health & safety purposes, the Corporate Head Office will fall under the remit of the Production Solutions Operations Responsible Senior Person.

13. Documentation

Revision History

Date	Version	Revised By	Reason For Revision
11 October 2011	1	Simone Schiavo	First draft
7 December 2012	2	Rachael Nelson	Annual board approval
7 August 2013	3	Simone Schiavo	Personnel changes
9 December 2013	4	Rachael Matzopoulos	Annual board approval

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Date	Version	Revised By	Reason For Revision
10 December 2014	5	Rachael Matzopoulos and Chris Jorio	Annual board approval
9 December 2015	6	Chris Jorio	Annual board approval
13 December 2016	7	Chris Jorio and Rachael Matzopoulos	Annual board approval
3 May 2017	8	Jon Bolton	"Driving at work" section added
30 June 2017	9	Chris Jorio	Personnel changes
2 November 2017	10	Chris Jorio	Personnel changes and annual board approval
14 February 2018	11	Chris Jorio	Personnel changes
3 December 2018	12	Chris Jorio	Personnel changes and annual board approval
17 December 2019	13	Chris Jorio	Personnel changes and annual board approval
14 May 2020	14	Chris Jorio	COVID-19 and home working

14. Templates

The templates listed below can be found on the following pages.

- **Group Health and Safety Policy Actions:** to support the reconciliation between local arrangements and local legal requirements with the key statement of the Group Health and Safety Policy. *This does not replace documentation already in place.*
- **Risk Assessment:** to support the risk assessment exercise to be completed by each business unit. *This does not replace documentation already in place.*

Group Health and Safety Policy Actions

Business unit / site name:

Overall and final responsibility for health and safety is that of (person name):

Day-to-day responsibility for ensuring this policy is put into practice is delegated to:

STATEMENT OF GENERAL POLICY	RESPONSIBILITY OF: Name/Title	• ACTION/ARRANGEMENTS • LEGAL REQUIREMENTS
To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities.		
To provide adequate training to ensure employees are competent to do their work.		
To provide adequate first aid arrangements.		
To provide basic welfare facilities and a healthy working environment.		
To maintain accurate logs for reporting accidents and near misses.		
To be able to properly manage risks.		
To engage and consult with employees on day-to-day health and safety conditions and provide advice and supervision on occupational health.		
To implement emergency procedures – evacuation in case of fire or other significant accident or incident.		
To maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage/use of substances.		
To ensure the health and safety poster is displayed.		
Signed:		

Risk Assessment

Business unit / Site name: _____ Department : _____

What are the hazards?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by who?	Action by when?	Done
Slips and trips	Employees and visitors may be injured if they trip over objects or slip on spillages.	General good housekeeping. All areas well lit, including stairs. No trailing leads or cables. Staff keep work areas clear, e.g. no boxes left in walkways, deliveries stored immediately, offices cleaned each evening	Better housekeeping needed in staff kitchen, e.g. on spills.	All staff, supervisor to monitor.	01/10/2011	01/11/2011

Assessment review date : _____ (usually within one year, or earlier if working habits or conditions change).

15. Appendix: 5 steps to Risk Assessment

Step 1

Identify the hazards

- **Walk around** your workplace and look at what could reasonably be expected to cause harm.
- **Ask your employees** or their representatives what they think. They may have noticed things that are not immediately obvious to you.
- Ensure that all **employees are aware** of the need for a safe working environment, to **report** anything that they think is unsafe and **always to report near misses and accidents** (regardless of period of absence from work).
- **Check manufacturers' instructions** or data sheets for chemicals and equipment as they can be very helpful in spelling out the hazards and putting them in their true perspective.
- Have a look back at your **accident and ill-health records** – these often help to identify the less obvious hazards.
- **Remember to think about long-term hazards to health** (e.g. high levels of noise or exposure to harmful substances) as well as safety hazards.

Step 2

Decide who might be harmed and how

Remember:

- some workers have particular requirements, e.g. new workers, new or expectant mothers and people with disabilities may be at particular risk. Extra thought will be needed for some hazards;
- cleaners, visitors, contractors, maintenance workers etc., who may not be in the workplace all the time;
- members of the public, if they could be hurt by your activities;
- if you share your workplace, you will need to think about how your work affects others present, as well as how their work affects your staff – talk to them; and
- ask your staff if they can think of anyone you may have missed.

Step 3

Evaluate the risks and decide on precautions

Having spotted the hazards, you then have to decide what to do about them. The law requires you to do everything 'reasonably practicable' to protect people from harm. You can work this out for yourself, but the easiest way is to compare what you are doing with good practice.

So first, look at what you're already doing; think about what controls you have in place and how the work is organised. Then compare this with the good practice and see if there's more you should be doing to bring yourself up to standard.

Step 4

Record your findings and implement them

Write down the results of your risk assessment, and share them with your staff. When writing down your results, keep it simple, for example 'Tripping over rubbish: bins provided, staff instructed, weekly housekeeping checks', or 'Fume from welding: local exhaust ventilation used and regularly checked'.

A risk assessment is not expected to be perfect, but it must be suitable and sufficient. You need to be able to show that:

- a proper check was made;
- you asked who might be affected;
- you dealt with all the significant hazards, taking into account the number of people who could be involved;
- the precautions are reasonable, and the remaining risk is low; and
- your employees or their representatives are involved in the process.

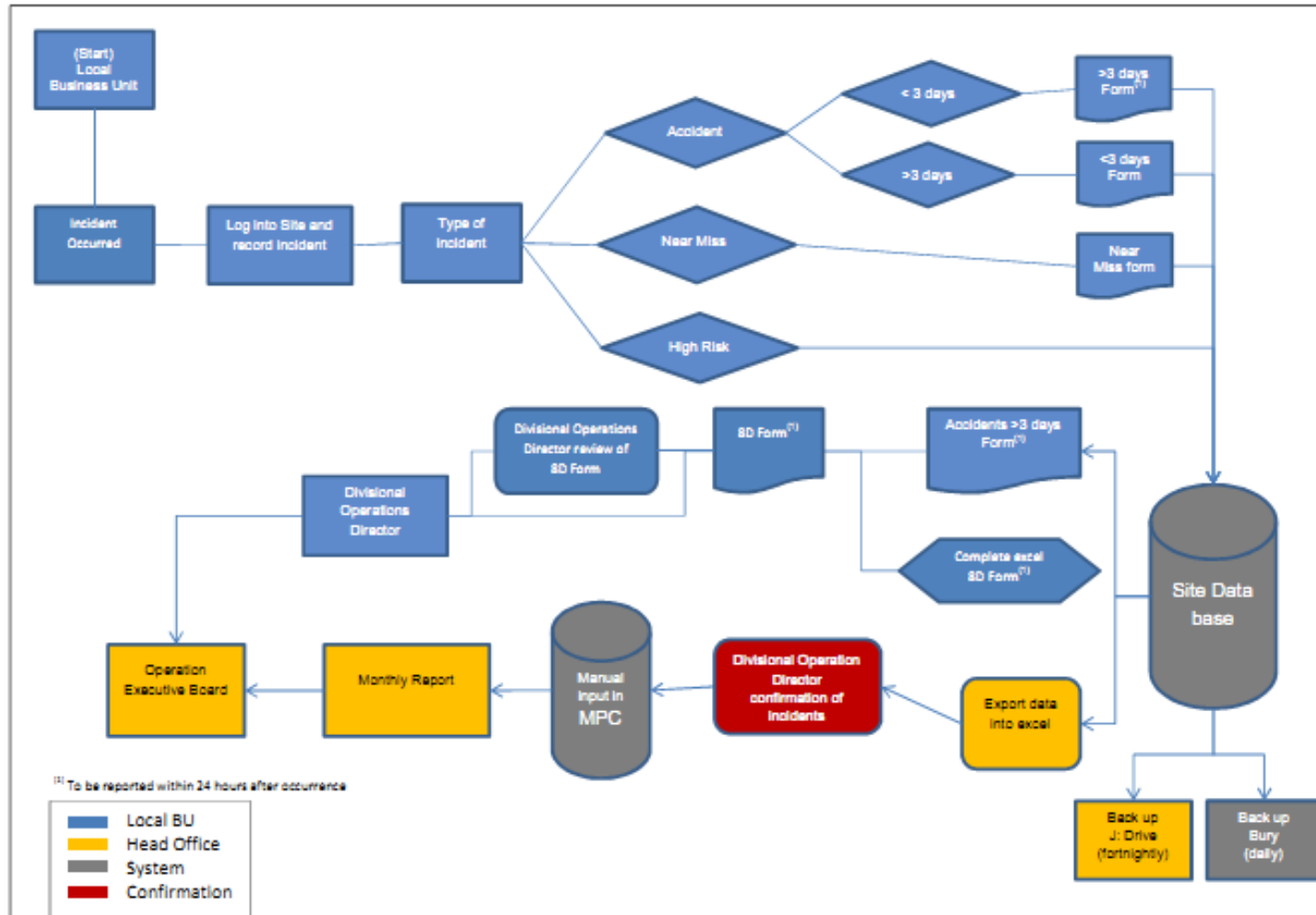
Step 5

Review your risk assessment and update if necessary

At least annually, review where you are, to make sure you are still improving, or at least not sliding back.

16. Appendix: Reporting process

Incident Report Process Chart



17. 8D Form template

Report no.			
part A - INDIVIDUAL			
Name of the person involved			
Job title			
Business Unit			
Address of BU			
Division			
Sex of person and seniority			
Contract type (employee, contractor, work experience)			
part B - ACCIDENT			
Date and time of accident			
Days of prognosis (describe if major or minor accidents):			
a. Agent of the lesion:			▼
b. Way of the accident:			▼
c. Risk condition:			▼
d. Imprudent act:			▼
e. Part of lesion:			▼
f. Kind of lesion:			▼
Describe the Injury (short explanation)			
Details of where on the company premises the accident happened (e.g. warehouse, factory, stairs, canteen, etc.)			
Details of where outside the company premises the accident happened, address and location type. (e.g. car, company travel, plane, court yard, street, public place etc.)			
Did the person who is injured become: a) unconscious, b) need resuscitation, c) more than 24 hours hospital, d) none of the above.			
part C - ACCIDENT			
Describe, in detail, the injury (what happened)			
First Aider's name or witness (if applicable)			
part D - CORRECTIVE ACTION PLAN - CONCLUSIONS			
Immediate action for damage limitation			
Permanent corrective actions			
Verification			
Precautionary action (Documents / System revision)			
Root cause analysis			
Conclusions			
part E - RESPONSIBILITY			
Name of the person who is responsible of the above actions, Job title	21		
Target date			
Compiled by: (department and name)			

18. Appendix. COVID-19 operational guidelines

General approach

These general guidelines cover the basic health and safety principles concerning sites which are allowed to operate under local applicable jurisdiction. Our overriding objective is to provide and maintain safe working conditions for all employees so that they can work with confidence.

The guidelines are designed to be generic and must be adapted to local requirements, for example the definition of acceptable distancing varies (1 metre under WHO; 2 metres under UK law). Government and other guidelines and best practices are continually evolving, and should therefore be reviewed frequently.

All sites are required to undertake a detailed COVID-19 risk assessment of processes in accordance with the Policy. This includes identifying the specific activities and controls implemented to mitigate the risks, which may go over and beyond the key points identified within this document.

The employees assigned site responsibility for health and safety are responsible for monitoring compliance with COVID-19 protocols, escalating issues, and driving appropriate behaviours. Assessments (audits) must be written up and reported to Group.

Permitted onsite access

Onsite screening procedures (such as temperature checks) are at the discretion of divisional management, unless they are mandated by law. Minimum periods of quarantines are established for staff if they develop symptoms compatible with a COVID-19 infection, or if they have been in contact with any person(s) suspected or have tested positive for COVID-19. In the key jurisdictions in which Vitec operates this is 14 days.

Additional risk assessment and mitigating measures must be implemented with respect to medically vulnerable persons. Such persons may need to be redeployed to roles which can be performed from home, or the safest available roles within the site.

External visits to sites are to be minimised. To allow entry to external suppliers, sites must establish entry, passage and exit procedures using predefined routes, methods and timings to reduce the possibility of contact with personnel working in the departments/offices involved. A process must be implemented to disinfect all surfaces which the visitor may have touched using an alcohol solution.

Employee travel to / from the site

Use of public transport and car share schemes is discouraged at this stage. Where possible, drive, cycle or walk to work.

Where there are no viable alternatives to public transport, employees should wear a face covering, travel at staggered times and wash hands with soap and warm water or use sanitisers upon arriving at the site.

Working arrangements

Work scheduling and organisation should be reviewed so that individuals should not be too close to other people for more than a short amount of time. The local minimum distancing guidelines should be used as a reference point.

Premises should be ventilated as much as possible.

Where social distancing measures cannot be fully enforced, the use of appropriate Personal Protective Equipment is mandated, as prescribed by your site health and safety lead. Personal Protective Equipment is the lowest level of control and should only be considered after all other means of protection have been exhausted.

The use of double shifts or altering the workflow and/or erecting temporary barriers may be required to minimise contact between individuals to a desirable level. Several measures must be assessed in accordance with health and safety guidelines and include: establishment of one-way systems, floor markings showing safe distances, multi-entry systems to ease congestion, etc. Where feasible, different shifts should include the same individuals so as to further reduce the risk of cross contamination.

Minimise site meetings through the use of virtual facilities, or require that a safe distance be maintained between all participants.

Cleaning and hygiene

The site management must ensure the daily cleaning and periodic sanitisation of the premises, workstations and any communal areas. End of shift cleaning and periodic sanitisation of keyboards, touch screens and mice with suitable detergents must be carried out both in offices and in production departments. Cleaners should be instructed to focus on high-frequency areas such as door handles, lift buttons, door plates, kitchens and bathrooms. A specialist company should be used for a professional deep clean if there is any suspected infection.

As the virus can survive several days on certain surfaces, new goods receiving protocols should be established to limit the exposure to the virus. All parcels and letters must be handled with gloves and other appropriate Personal Protective Equipment, and employees handling these reminded to wash hands.

Hand sanitisers must be provided in entrance areas and other key locations.

Posters should be put up and regular reminders issued to staff to adopt good hygiene including but not limited to: frequent hand washing, keeping minimum social distances, sneeze or cough in a tissue, avoid touching face with unwashed hands, regularly washing clothes, etc.

Communal Areas

Access to communal areas, including canteen and changing rooms, must be restricted, and access staggered and subject to a specific risk assessment.

There must be continuous ventilation of these areas, reduced time spent inside them and a safe distance between the people occupying them.

Dealing with suspected or known cases

Clear protocols are established for dealing with known or suspected cases, and subsequently investigating other infections and liaising with local health authorities.

All incidents are escalated to Group, as per the reporting guidelines.