

SAFETY STATEMENT

2025

Date: 19th December 2024

Revision 24

Contents:

Foreword

m			4	4
r	Я	r	r	

1.1 Statement of General Policy

1.2 Safety Management Organisation and Responsibilities

Organisation structure

Roles & Responsibilities

Managing Director

Health & Safety Manager

Safety Representative

Employees

Meetings

Contractors

Visitors

1.3 Training

Employers Duty

Mandatory Training

Additional Training

Procedure for New Employee's

1.4 Health & Welfare

General

Violence/Assault/Bullying/Harassment

Workplace Stress

Health Surveillance

1.5 Emergency Arrangements

First Aid

1.6 Review and Revision of Safety Statement

Part 2 Risk Assessment

<u>Part 3</u> Safe Operating Procedures

Part 4

Accident and Investigation

Accident Report Form (IR forms) Internal

Accident Report Form External

Safety Suggestion Form

Risk Assessment Template-Actual Risk Assessments

Induction package

Emergency Evacuation Procedure & Plans

Company Policies

Foreword

The purpose of the Safety, Health and Welfare at Work Act, 2005 and subsequent Regulations is to ensure the safety, health and welfare of all staff in the work place.

This Act and subsequent regulations applies to employers and employees alike in all types of work and embraces the activities of DGD Papers Limited

The Act requires the employer to prepare a written Safety Statement describing the employer's commitment to safety and appropriate arrangements to ensure employee awareness, training and obligations to safety. The attached site specific safety statement meets that commitment.

This Safety Statement is an active document i.e. it does not stand still in time and must be continually reviewed and, if necessary, altered to take account of changing work practices and changing regulations. This review process is referred to in section 1.6 of this document.

This Safety Statement is divided into 4 Main Parts.

Part 1 is the basic generic Safety Statement.

Part 2 is a comprehensive risk assessment of current identified hazards.

Part 3 contains a list of Safe Operating Procedures (SOPs) for all hazardous activities.

Part 4 contains Appendices which include associated forms and policies

1.1 STATEMENT OF GENERAL POLICY

The Safety, Health and Welfare at Work Act, 2005 requires employers and employees alike to consider health and safety as a joint responsibility. We must all strive to work together and co-operate as a team to ensure that safe working becomes an integral part of our organisational culture.

It is our mission to provide a safe and healthy work environment for all our staff and to meet our duties of care as far as is reasonably practicable, to contractors and members of the public who may be affected by our operations.

It is also our policy to consult with all staff on matters of health and safety. This is essentially achieved through the operation of Safety Management and the election and work of Safety Representatives. Staff must also comply with their duties under the Safety, Health and Welfare at Work Act, 2005 to notify management of identified hazards in the workplace.

Safe working is a condition of employment. All personnel, including contractors, will assume responsibility for working safely. The success of the policy will depend on each person's co-operation. It is therefore, important that the Safety Statement be read carefully by all concerned and each person's role and the overall arrangements for health and safety are fully understood.

The matters to which this policy extends include:

- Providing a management structure that will ensure the safety, health and welfare of all staff and others affected by our business.
- Providing and maintaining a safe and healthy working environment, in accordance with statutory requirements.
- Providing systems of work that are planned, organised, performed and maintained so as to be safe.
- Providing such information, instruction, training and supervision as is necessary to enable employees to perform their work safely and effectively and without risk to their health or others.
- Ensuring the provision and maintenance of safety devices and personal protective equipment to ensure safety at work where it is not reasonably practicable to control or eliminate hazards or in prescribed circumstances.
- Preparing and revising, as necessary, plans to be followed in emergencies.
- Providing and maintaining welfare and hygiene facilities.
- Maintained Gym with appropriate information, instruction and training.
- Regular reviewing of this Safety Statement to ensure that it reflects current work practices and any developments in legislation.

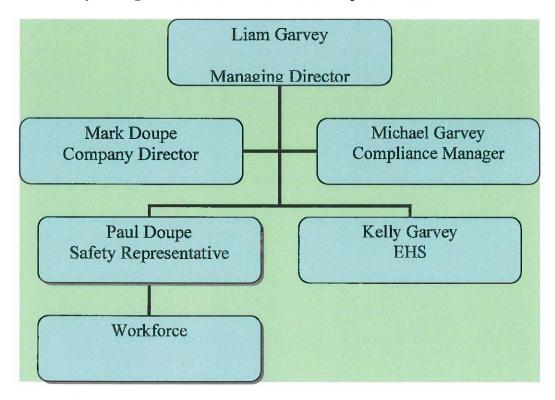
Signed:

Liam Garvey
Managing Director

DGD Papers Limited

1.2 ORGANISATION and RESPONSIBILITIES

1.2.1 Safety Management Structure within DGD Papers Limited



1.2.2 Roles & Responsibilities

1.2.2.1 Managing Director

- The Managing Director (Liam Garvey), holds overall responsibility for health and safety within the confines of DGD Papers Limited
- His deputy on all safety issues is Paul Doupe (Safety Representative)
- The Managing Director will give his full commitment to ensure the Health & Safety programme is management driven and shall source/request sufficient resources as need arises
- The Specific role of implementing responsibilities is delegated to the Health and Safety Representative-Director in consultation with the Managing Director, however ultimate responsibility lies with the Managing Director.
- All works carried out by DGD Papers Limited that comes under the Safety, Health and Welfare at Work Act, 2005 must be *managed* in accordance with this legislation.

1.2.2.2 Responsibilities of the Compliance and EHS Manager

The role of Compliance and EHS Manager (referred to as the Safety Manager), is to manage the day to day functions of the Safety Management Programme. The specific responsibilities are grouped by four main categories

The specific responsibilities of the Safety Manager are grouped by four main categories

- Safety Management,
- · Consultation,
- Training
- Recording
- Accident/Incident Investigation
- Compiling Method Statements & RA's

A. Safety Management

- Co-operate fully with the Managing Director to enable him to fulfil his duties which may be delegated from him.
- Ensure that the Safety Statement is reviewed and in particular the risk assessments annually to ensure that they reflect current work practices. Report significant changes in the Safety Statement or delegate responsibility for this action appropriately.
- Report any non-compliance and significant hazards to the Managing Director.
- Ensure that risk assessments are carried out for all activities within the company. Review risk assessments regularly. These should be completed annually and in between in the event of any significant changes within the company (premises, environment, work practices, and new equipment etc.)
- Appoint specific competent people to be responsible in the event that action is required in relation to health and safety.
- Ensure new equipment, processes, hazardous substances etc. are assessed prior to purchase to determine their suitability from a health and safety perspective, before being used on site.
- Review safety performance regularly and initiate action for any non-compliance.
- Ensure that personal protective equipment (PPE) and clothing is available for staff as required.
- Ensure that safety guards are in place on all balers.
- Ensure that all safe operating procedures are fully complied with.

B. Consultation

- Establish and ensure on a continual basis a consultative process with staff (safety committee)
- Consult with HSA to keep up-to-date on health and safety legislation and ensure requirements are followed.
- Ensure that all employees understand that health and safety information is available as a right.
- Take a direct interest and involvement in health and safety in ensuring a safe and healthy working environment.
- Ensure that all new staff are given adequate safety induction detailing job specific method statements etc.

C. Training

- Ensure that all persons with specific responsibilities in relation to health and safety are aware of their responsibilities and have received sufficient training and/or instruction to enable them to fulfil their roles.
- Plan and implement training and information in relation to health and safety at all levels of staff.
- Ensure that adequate supervision is available at all times for new recruits or those undergoing training.
- Ensure that a fire & emergency plan has been prepared and that personnel responsible under these plans have received adequate training and/or instruction.
- Ensure that a suitable number of first aiders are available.

D. Recording

- Ensure that all first aid equipment and fire-fighting equipment receives regular inspections and that it is maintained or serviced as required and these inspections are recorded.
- Ensure that all records relating to the health and safety of staff are maintained and that any records, test sheets or registers required by law, are correct and up to date.
- Ensure that all accidents and dangerous occurrences are recorded and fully investigated and investigation begins within 24 hours with remedial measures implemented.
- Ensure that all tools and machinery are properly registered and all required testing and training in relation to these is implemented

E. Accident/Incident Investigation

- All Accidents/Incidents are to be notified immediately to the Managing Director
- The initial concern is to relate to the health and welfare of the staff involved. As soon as the Accident/Incident is over an investigation must be launched.
- An Accident/Incident Investigation Form (Internal) must be filled out for all occurrences.
- If required the HSA must be notified and an Accident/Incident Investigation Form (External) must be filled out.
- All staff involved and those witnessing must be interviewed and a details account must be documented from them.
- Any additional sources such as CCTV must be reviewed to facilitate investigation
- Subsequent to information gathering a meeting must be arranged with the Managing Director to assess the Accident/Investigation. Causes are to be determined and actions sanctioned to minimise or eliminate further risk.
- Staff should then be consulted on the new measures to achieve a consensus.

F. Compiling Method Statements & Risk Assessments

- Common or regular activity Method Statements and Risk Assessments are to be devised by the EHS. They are to be included in this document
- Site specific Method Statements and Risk Assessments are to be completed by the operators involved where necessary. The operators are to be provided with the necessary training in order to be able to do so.

1.2.2.3 Role of Safety Representative.

(Currently held by Paul Doupe)

Appointment

Safety Representative(s) to represent the employees in consultations with management with regards to regards health, safety or welfare issues will be appointed. Staff are encouraged to contact their Safety Representative directly on matters relating to health and safety.

Overall Function

The Safety Representative may consult with, and make representations directly to management on safety, health and welfare matters. The intention of these consultations is to prevent accidents and ill health, to highlight problems, and identify means of overcoming them.

The Safety Representative will be given full access to any information in relation to health and safety that directly relates to the safety, health and welfare of staff. The Safety Representative will be given the opportunity to avail of relevant health and safety training as required.

Management shall take such steps as are practicable so that the Safety Representative will be informed of any inspection visit by the Health and Safety Authority and invited to accompany them during a site inspection.

A notice to inform all employees of the appointment of Safety representatives will be put up in their place of work.

Under the Safety, Health and Welfare at Work Act, 2005 the Safety Representative may: -

- Make representations to the employer on any aspect of safety, health and welfare.
- Investigate accidents and dangerous occurrences provided that it does not interfere with the performance of statutory obligations.
- Make oral or written representations to the Health and Safety Authority on matters of safety, health and welfare.
- Receive advice and information from the HSA.
- Inspect the work place subject to agreement with employer as to frequency of inspections.
- Investigate potential hazards and complaints made by staff that he/she represents.
- Where invited consult with the HSA Inspector and accompany them on visits (but not on investigations of accidents).
- Have time off as may be reasonable in order to acquire information on matters of safety, health and welfare.

A full outline of the role of the Safety Representative is provided in the Healthy & Safety Authority publication 'Guidelines on Safety Consultation and Safety Representatives'.

DGD Papers Limited Safety Representative is:

Paul Doupe

1.2.2.4 Role of Employees

DGD PAPERS LIMITED recognises that all employees have an essential role to play in ensuring an effective safety management program. It is the policy of DGD PAPERS LIMITED to involve employees in all matters related to Health & Safety. A successful Safety management policy cannot be guaranteed without the involvement and full commitment of staff and management alike.

Each employee is reminded that they have specific statutory responsibilities, which are outlined in the **Safety, Health and Welfare at Work Act, 2005**. This places a number of duties on staff whilst they are at work.

Specific responsibilities include:

- To take reasonable care of their own health and safety and that of other personnel who may be affected by his/her acts or omissions.
- To co-operate with his/her employer or any other person to enable his/her employer to comply with statutory obligations.
- To use any suitable appliance, protective clothing, convenience, equipment or other means provided for securing safety, health and welfare.
- To report to management without delay any defects of which he/she becomes aware of in equipment, place of work, or system of work, which might endanger safety, health and welfare.
- Not to intentionally or recklessly interfere with any safety measure provided for securing the safety, health or welfare of persons.

In addition to statutory obligations DGD PAPERS LIMITED also asks all employees to adhere to the following.

- Read, understand and utilise the Safety Statement and Safe Operating Procedures (see Part 3) provided for safe execution of the individual work processes, this includes Site Specific Safety Arrangements such as 'Method Statements' etc..
- Inspect the work area and equipment to ensure that it is in proper working order and in safe condition prior to beginning work. Equipment which is in poor/dangerous condition must be clearly tagged with a red "DO NOT USE" label
- When working with others in a process, ensure that all members of the team are working in accordance with procedures and training.
- Communicate any concerns regarding a work process and any environmental, health or safety issues to your Manager and work toward improvement and resolution of those issues.
- Report Near Misses and/or Safety Concerns to your Supervisor See Appendix 2 for Safety Suggestion form.
- In the event of serious or imminent and unavoidable danger, all employees are required to stop working and report the situation to their manager.

1.2.2.5 Role of Safety Management Meetings

1.2.2.5.1 Role

- The Safety Management meetings are constituted so as to ensure adequate consultation between management and staff in matters of Health, Welfare and Safety.
- These meetings have the pivotal role in the management and implementation of Health and Safety in DGD PAPERS LIMITED along with encouraging and promoting a safety culture.
- Safety meetings occur at a minimum annually and as required.

1.2.2.5.2 Responsibilities

The main responsibilities of the meetings are as follows.

- A consultation forum for all Health, Safety and Welfare matters within the context of the work of DGD PAPERS LIMITED.
- Review all issues related to Health, Safety & Welfare including Safety Statement and Health and Safety training.
- Recommend changes and/or improvements relevant to Health and Safety.
- Continuous review and development of Health, Safety & Welfare policies and procedures such.
- Keep Records and Minutes of all Safety meetings.

1.2.2.5.3 Membership

The Safety Meetings shall consist of.

- A. Safety Management Team (Safety Manager/Ass. Safety Manager)
- B. Safety Representatives

1.2.2.5.4 Typical meeting agenda

A typical agenda for Safety Committee meetings may include.

- Minutes and matters arising from previous meeting.
- Safety Statement review issues
- Appointment and duties of staff with health and safety responsibilities;
- Outcome of risk assessments on workplace hazards;
- Notifiable accidents or dangerous occurrences
- Welfare issues Bullying, Stress etc.
- Engagement of safety and health consultants
- Planning and organisation of health and safety training;
- Introduction of new technologies or new work processes
- Purchasing personal protective equipment.

For further reference on the effective consultation please see the Health and Safety Authority publication 'Guidelines on Safety Consultation and Safety Representatives'.

1.2.2.6 Role of Contractors.

- All outside contractors working in DGD PAPERS LIMITED must satisfy requirements in relation to safety, health and welfare set out in the Guidelines for Engaging Contractors see appendix 6
- Safety Statements of all contractors to be issued prior to any works commencing and Method Statement

1.2.2.7 Role of Visitors and Recreational Users

All visitors are required to sign themselves in and out of the facility at reception. This is used as a reference for visitors onsite in the event of an emergency.

During the visitors stay on the premises they are expected to adhere to any health and safety arrangements that have been made. In the event of an emergency or test evacuation of the building, all visitors shall be required to participate, and be guided from the premises by the member of staff to whom they have been visiting or in the case of recreational users will obey the persons organising the evacuation. Visitors to staff and recreational users must observe and obey all safety signs posted.

DGD PAPERS LIMITED exercises a duty of care towards all Visitors, Recreational Users and Trespassers as required by the Occupiers' Liability Act, 1995.

Reference: Occupiers Liability Act, 1995.

1.3 TRAINING

1.3.1 Employer's Duty

The Safety, Health & Welfare at Work Act (2005) places duty, on every employer, to provide adequate training for all employees in relation to Health and Safety. This training must be provided, and include in particular, information and instruction relating to the particular task or workstation involved.

DGD PAPERS LIMITED are committed to provision of Health and Safety training to all employees as necessary. Appropriate training for staff is essential to ensure best and safe practice in all DGD PAPERS LIMITED's operations.

1.3.2 Mandatory Training

Mandatory training is required for the following.

Induction

Forklift operators

- Operation of shredder
- Operation of baler
- Safety Representative training

And other tasks which the Minister for Enterprise Trade and Employment may prescribe from time to time.

Under a new EU Directive on **Temporary Work at Heights** mandatory training in the use of equipment associated in that work e.g. Safety Harness, Rope Access, will be required. Note: No ladders may be used at any time within DGD Papers Limited.

1.3.3 Additional Training

In addition it is company policy that all relevant employees must be trained by a competent person/organisation in the following non-exhaustive list of courses.

- Manual Handling
- Occupational First Aid
- Fire Warden
- Fire Fighting

1.3.4 Procedures for New Employees

This procedure is to be carried out by the Supervisor (or Manager) of the workplace where the new employee will be required to work

- Explain to the new employee what he/she will be required to do and to whom he/she will be directly responsible to.
- Make available to the new employee a copy of the Safety Statement, explain
 its purposes and ensure employee is aware of his/her responsibility. Supervisor
 must ensure that employee reads Safety Statement and obtain a signed
 statement to this effect.
- Ascertain if new employee has any disability/illness which could prevent him/her carrying out certain operations safely or which could require additional protective measures.
- Show the new employee where copies of the Safety Statement Standards, Regulations and associated documents are kept.
- Warn new employees of any potential dangerous areas on site or in the workplace.
- Advise new employees of any prohibited actions on site or in the workplace e.g. working in specific areas without safety glasses etc.
- Inform the Personnel Department if any training or instruction required.
- Issue new employee any protective clothing or equipment necessary e.g. safety goggles, ear defenders, steel toe boots etc.
- Show the new employee the location of the first aid box and explain the procedure in the event of an accident. In particular, explain the necessity to record all accidents and incidents however trivial.
- All new staff shall receive full induction package as per Appendix 8.

Summary

Training shall be provided in all instances where mandatory, deemed necessary or when risk assessment identifies training requirement.

1.4 HEALTH & WELFARE

DGD PAPERS LIMITED recognises the valuable role of all its employees and the importance of their physical and mental well-being. Though health hazards are less obvious than safety ones the resulting ill health can be just as serious. Hence DGD PAPERS LIMITED has documented policies to protect the health & welfare of all its employees, an obligation under the Safety, Health and Welfare at Work Act, 2005.

Management is pro-active in continuously encouraging an active health and welfare regime for staff, by using outside consultants, guest speakers, training and information sessions and, by encouraging all employees to pro-actively suggest improvements.

Occupational health & welfare is about how conditions at work may affect your health and how your health may affect your work.

1.4.1 General Welfare

1.4.1.1 Pregnant women

Because there are some hazards in the workplace which may affect either the health of the woman or her developing child, the Safety, Health & Welfare at Work (Pregnant Employees etc.) Regulations 1994 provide specific protection during this period. These Regulations

- (a) Identify a list of conditions known to affect a pregnant woman, a breast feeding woman or the developing child.
- (b) Outline the ways to manage health & safety of the pregnant (or breast-feeding) woman during this period.

This procedure is designed to provide guidance to Supervisors on work which may reasonably be undertaken by pregnant Employees. The elements of this procedure are based on the relevant legislation and on a guide to the Regulations published by the Health & Safety Authority in 1996.

1.4.1.1. (A) Responsibilities of Pregnant Employees & their Supervisor

Employees

• Report their pregnancy to their Supervisor/Manager as soon as confirmed to the Employee by a medical practitioner (see appendix 7 for Pregnancy Notification Form) NOT CURRENTLY APPLICABLE TO DGD PAPERS LIMITED.

Supervisor/Manager

- Make an assessment of work undertaken by a pregnant Employee and make any changes necessary in work undertaken by pregnant/breast-feeding Employees.
- Maintain regular contact with the Employee through the course of the pregnancy to ascertain the Employees changing condition.
- Review all notification reports.
- Conduct periodic audits in compliance with this procedure.

1.4.1.1. (B) Considerations regarding Pregnant Employee Work Duties

Standing Tasks

Consideration must be given to removing a pregnant Employee from tasks that require long periods of standing (in excess of half an hour at any one time). It is worth noting that a pregnant Employee may experience difficulty in sitting during the last weeks of pregnancy and may express a preference to stand at this stage.

Work Involving Chemical Exposures

Chemical substances are not typically used but if introduced to Facility must be assessed for risk to all including pregnant employees

Manual Handling

Consideration must be given to removing a pregnant Employee from tasks that include excessive periods of manual handling. It is worth noting that a pregnant Employee will show a decreasing capacity for manual handling as her pregnancy advances and is at greater risk from manual handling injury after 28 weeks of pregnancy.

Other Factors (Non-exhaustive list)

Other factors to include in consideration of work undertaken by a pregnant or breast-feeding woman include potential for:

- · Physical Shocks including direct blows to abdomen
- Exposure to extremes of noise, cold or heat
- Extremes of non ionising radiation (magnetic fields, X rays)
- Biological Agents (viruses, bacteria etc.)

1.4.1.2 Hygiene and cleaning

Sanitary facilities are provided and maintained to a high standard and cleaned regularly. Staff should notify their Supervisor if these require attention.

1.4.1.3 Rest Breaks

Designated areas have been allocated for employees to have their rest break while on the premises.

1.4.1.4 Medical Monitoring

Provisions for occupational health monitoring will be made available to employees where necessary in accordance with the company's legal obligations.

1.4.1.5 First Aid

Management are committed to their legal obligation under Part IX of Safety, Health and Welfare at Work Regulations, 1993 – 'to provide first aid equipment which is suitably marked and is easily accessible' and also 'to ensure such number of occupational first-aiders as is necessary'.

At a minimum each area represented by a Supervisor on the safety committee, will have a trained occupational first aider.

1.4.1.6 Canteen Facilities

Canteen facilities with drinking water are provided as per the SHWW Act 2005 'Provision of facilities and arrangements for welfare of employees'.

1.4.2 VIOLENCE/ASSAULT/AGGRESSION/BULLYING/HARASSMENT

DGD PAPERS LIMITED fosters a collaborative work environment based on teamwork, accountability, and respect for the dignity and value of each employee.

The following acts by an individual or group of individuals, irrespective of position within the organisation, shall be construed as violence/assault/aggression/harassment or bullying.

Note: Applies to both workplace and work sponsored functions outside of the premises.

- using violence or the threat of violence towards another's person or property:
- persistent, aggressive behaviour towards another;
- persistent criticism or condemnation:
- repeated verbal harassment e.g. picking on a person as the butt of jokes,
- uncomplimentary remarks and/or use of songs/jokes or laughter as a form of ridicule;
- repeated ridicule by the display of circulation of words, pictures or material;
- repeated physical harassment e.g. picking on a person as the butt of horseplay or behaviour designed to ridicule, humiliate or terrorise an individual;
- continued and deliberate staring, obstruction or other non-verbal physical behaviour;
- showing hostility through sustained unfriendly contact or exclusion;
- repeated unfair selection for difficult or unpleasant tasks.
- It is the impact of the conduct on the recipient and not the intent of the perpetrator that determines if the behaviour is unacceptable.
- Theft or damage of individuals property

DGD PAPERS LIMITED is committed to ensuring any of the instances outlined above are prevented. To ensure success in this regard, DGD PAPERS LIMITED encourages prompt reporting of any such behaviour to allow for early intervention. Such reporting shall be made to Manager or Supervisor as appropriate. The normal procedures under civil service rules shall then apply.

For further reference see HSA publication 'Guidelines on the Prevention of Workplace Bullying'.

1.4.3 WORKPLACE STRESS

Work related stress is experienced when the demands of the work environment exceed the employee's ability to cope with them. If stress is intense and goes on for some time it can lead to both mental and physical ill health.

When demand and pressure become too much they lead to stress.

Work related stress could lead to conditions such as nervousness, fatigue, anxiety and heart disease.

DGD PAPERS LIMITED aims to prevent work related stress, assess areas which may lead to work related stress and take adequate preventive measures where necessary.

In the prevention of stress, Management should be aware of the demands of an employee's job such as;

- Workload
- Relationships e.g. harassment by colleagues etc.
- Support from colleagues
- Training
- Individual factors

Most of the contributing factors, which lead to workplace stress, may not be recognisable on a surface level. Therefore Management ask all employees to inform them off stress factors in their daily duties thus allowing management take the necessary steps to prevent further deterioration.

For further reference see HSA publication 'Work-related Stress, a guide for employers' and appendix 8 'Guidelines on managing stress'.

1.4.4 HEALTH Surveillance

Under the Safety, Health and Welfare at Work (General Application) Regulations, 1993 – General Safety and Health Provisions, it is the duty of DGD PAPERS LIMITED to ensure that health surveillance is made available for every employee appropriate to the health and safety risks that may be incurred at the workplace. See also :2007 General Applications

DGD PAPERS LIMITED will provide as appropriate health surveillance such as Eye/Vision tests for VDU users, Audiometric testing / hearing for equipment operators etc. and other testing as identified through risk assessment process.

1.5 EMERGENCY ARRANGEMENTS

The Safety, Health and Welfare at Work Act, 2005 and the Fire Services Act, 1981 require that employers prepare and plan for an event leading to an emergency. We need to be in a state of readiness that anticipates the emergency and the required communication and subsequent action.

We will ensure the provision of a safe workplace, which includes appropriate fire precautions to prevent fires, detect them if they arise and ensure the safe and speedy evacuation of everyone from the building in which a fire has started. We will also ensure adherence to the *Fire Services Act*, 1981.

DGD PAPERS LIMITED shall establish the following Fire & Emergency Plan

- Perform Fire Drills at least 6 monthly
- Audit fire alarm systems
- Audit Fire prevention equipment
- Assess all sites for Fire risk and perform site safety inductions prior to commencement of work

1.6 REVIEW AND REVISION OF SAFETY STATEMENT

DGD PAPERS LIMITED is a dynamic environment constantly undergoing changes and developments regarding work practices, job duties, facilities, and services provided. To keep current, with the nature of the changing environment, new health and safety legislation and to establish the effectiveness of the health and safety management systems, a review process is necessary.

1.6.1 Review Purpose

Reviews will examine;

- The operation, maintenance and effectiveness of the systems as designed including assessment of near misses, safety suggestions and incident/accident reports.
- The design, development and installation of the health and safety management system in changing circumstances such as new legislation, best work practices, new processes and equipment and recommendations from internal and external bodies.

1.6.2 Review Process

Reviewing is a continuous process undertaken at different levels in the organisation. It includes

- Remedying failures to implement workplace precautions during routine activities
- Provision of training on an on-going pro-active basis.
- Open discussion and consultation through the Safety Management meetings
- Responding to results of Risk Assessments and Audits
- Recommending preventive/corrective measures to the Safety management members
- Scheduling and performing Risk Assessments (as per section 2) of work areas and practices.

1.6.3 Review Frequency

Reviews shall be performed on an-ongoing basis as the need arises. However at a minimum the following reviews shall be performed.

- Full formal review of the Safety Statement and associated procedures/policies along with recommendations from all audits & risk assessments shall be performed annually at a Safety Management Meeting.
- All new processes, job functions, equipment or operations shall undergo a documented Risk Assessment (as per section 2)
- A full Risk assessment shall be carried out at least annually (scheduling and appointing of persons responsible shall be agreed by the Safety Management)

PART 2 RISK ASSESSMENTS

All Limerick site activities shall be assessed at least annually

What is a Risk Assessment?

A Risk Assessment is a process for managing health and safety in the work place. It is based on the identification of hazards and the continuous assessments of risk specific to each site or site in order to improve the working environment.

What is a Hazard?

A hazard is anything that can potentially cause harm. In formulating this Safety Statement, the hazards associated with the operations carried out in DGD PAPERS LIMITED have been identified and subsequent recommended control measures needed.

How to ensure Effectiveness of Risk Assessment.

- 1. Risk Assessments will be carried out regularly and any risks identified, using Blank Risk Assessment Templates see appendix 3). Risks will be assessed (along with recommended controls needed) by the Safety Committee.
- 2. As part of the continuous assessment process it is critical that the Safety Committee ensure recommendations are implemented and effectiveness verified.

Risk Assessment Rating and How to perform Risk Assessment

Risk Assessment and Recommendations will be documented and updated as needed in Matrix Format detailing Area, Operation, Risk Rating and Controls needed with an expected completion date (see appendix 3 for Risk Assessment Template)

Standard Risk Assessments

Severity of Consequence (S)

	20.01.03										
1	Insignificant/minor first aid, no time off, no loss										
2	Lost time, recoverable, (strain, sprain,										
L	laceration, dermatitis)										
3	Temporary disability, recoverable (minor										
	fracture, asthma, deafness, concussion)										
4	Permanent disability, survivable (major										
	fractures, amputation, head injuries, eye										
	injuries, poisoning)										
5	Causing death to one or more people (fatal										
	injuries, occupational cancer, fatal disease/fire)										

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	Likelillood (L)
1	Improbable
2	Low
3	Medium
4	High
5	Almost certain

Risk Level(R)

()	
Trivial	1-4
Tolerable	5 - 9
Moderate	10 - 14
Substantial	15 – 19
Intolerable	20-25

Evaluation of Risk Significance & Timescales

Risk Level	Action & Timescale
Trivial	No action required
Tolerable (low)	No further action required – but
	monitoring to continue to ensure control
	maintained
Moderate	Risk reduction measures implemented
	within $3-6$ months
Substantial (High)	Work should not start until risk reduced.
90 900 800	For on-going work Corrective measures
	to be implemented as soon as possible
Intolerable	No work to start & current work to be
	stopped until risk eliminated.

Forklift Operation

	Forkint Operation	ш									
No.:	Activity:	Identify Hazard:	Who is at risk:	Risk Rating:			Controls Measures:		Risk Ratin		Risk Level
				L	S	R		L	S	R	
1	Forklift Movement	Injury or Death from Collison	Warehouse personnel, staff	3	5	15	Forklift Training, Vehicle Checks, Beacons, Alarm, Site Induction, HiVis Jackets, Signage, Good Housekeeping		5	10	Moderate
2	Forklift used in an unsafe manner	Injury or Death from Collison	Warehouse personnel, staff	3	5	15	Forklift Training, Vehicle Checks, Beacons, AlarmSite Induction, HiVis Jackets, Signage, Good Housekeeping		5	10	Moderate
3	Damaged parts on the Forklift	Injury or Death from Collison	Warehouse personnel, staff	3	5	15	Planned Preventative Maintenance and Vehicle checks, Forklift training		5	10	Mod erate
4	Forklift used without seat belt	Injury or Death from fall	Warehouse personnel, staff	3	5	15	Seatbeits fitted, Forklift training	1	5	5	Tolerable
5	Falling Objects from Forklift	Injury or Death from crush	Warehouse personnel, staff	3	5	15	Planned Preventative Maintenance and Vehicle checks, Forklift training, Safe working loads not to be exceeded.	2	5	10	Moderate
6	Battery Charging	Burns/Injury/Explosion	Warehouse personnel, staff	3	5	15	Proprietary charger installed by electrian used in accordance to instructions. Acid resistant gloves and googles supplied.	2	5	10	Mod erate

Manual Handling

No.:	Activity:	Identify Hazard:	Who is at risk:	Risk Rating:			Controls Measures:		Risk Ratin		Risk Level:	
		riazaiu.		L	5	R			S	R		
1	Lifting Bags/Boxes	Back Injury/foot injury	Collection Staff & Warehouse Staff	3	4	12	Inhouse Manual Handling training, mechanical aids such as wheelie bins, trolleys, forklift, tail lifts provided. PPE steel toe boots provided. Bag size/weight limits.	2	4	8	Tolerable	
2	Repetitive Lifting/movement	Back Injury	Collection Staff & Warehouse Staff	3	4	12	For larger collections additional staff will be sent to help. Inhouse Manual Handling training, mechanical aids such as wheelie bins, trolleys, forklift, tail lifts provided. PPE steel toe boots provided. Bag size/weight limits.	2	4	8	Tol erable	

Lone Working:

No.:	Activity:	Identify Hazard:	Who is at	Risk Rating:			Controls Measures:	-	Risi Ratin		Risk Level:	
	,		risk:	L	S	R		L	S	R		
1	Unfamiliar Site	Accident/Injury/death	Driver/Public	3	5	15	Site information taken by ops staff and provided to driver verbally and through job dispatch programme. Most sites require sign in and provide liason for the collection. Staff training.	2	5	10	M ode rate	
2	Slip/trip/falls	Injury/death	Driver	3	5	15	PPE, Good housekeeping (vehicles), Mobile phone, Handheld, first aid kit in vehicle, vehicle tracking.		5	10	Moderate	
3	Workload too much for individual	Injury	Driver	3	4	12	Job assessed by ops prior to dispatch to driver. PPE, Mechanical aids provided, manual handling trainng, staff informed to stop and report back to base if job is outside of the prescribed parameters.	2	4	8	Tolerable	
4	Risk of Violence	Injury/death	Driver	3	5	15	Most client sites are access controlled. Other sites are in populated areas and works are carried out during daytime hours. Mobile phone, handheld, vehicle tracking, no valuables/cash handling	2	5	10	Moderate	

Offsite Shredding:

No.:	Activity:	Identify Hazard:	Who is at risk:	Risk Rating:			Controls Measures:		Ris! Ratin		Risk Level:
				L	S	R			S	R	
1	Vehicular Movement	Injury or Death from Collison	Operators, Public	2	5	10	Driver Training, Vehicle Checks, Site access assessment prior to arriving onsite.	1	5	5	To lerable
2	Manual Handling	Back Injury, Foot injury	Operators	3	4	12	Manual Handling training, Mechanical aids (e.g. lifting equipment), Bags with weight limits.	2	4	8	Tolerable

Onsite Shredding:

No.:	Activity:	Identify Hazard:	Who is at risk:	Risk Rating:			Controls Measures:		isk R	ating	Comments:
				L.	S	R			S	R	
1	Vehicular Movement	Injury or Death from Collison	Operators, Public	2	5	10	Driver Training, Vehicle Checks, Reversing Alarm, Site access assessment prior to arriving onsite.	1	5	5	Tolerable
2	Manual Handling	Back Injury, Foot injury	Operators	3	4	12	Manual Handling training, Mechanical aids (e.g. lifting equipment), Bags with weight limits.		4	8	Tolerable
3	Operating machinery with moving parts	Entanglement, crushing, amputation, death	Operators	3	5	15	Operator training, SOP, Vehicle checks, safe area of work cordon, PPE, machine guards and emergency shut off.		5	5	Tol erab le
4	Prolonged noise exposure from operating truck	Deafness/hearing loss	Operators	2	4	8	PPE e.g. Ear protectors	1	4	4	Trivial

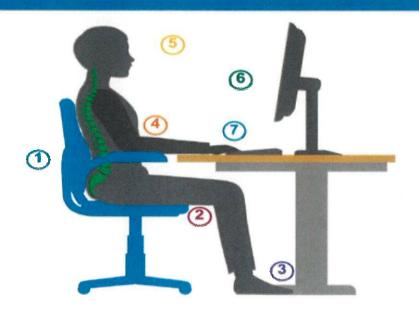


Risk Assessment:	Display Screen Equipment Workstation Risk Assessment Form											
Issue date:	05/08/2022	Issuer:	KG		eview Date:	Aug 2023						
Part A		DSE Wo	rkstat	ion F	Risk Asse	ssment						
Assessor:												
DSE Users name:												
Location:			Da	ate:								

Tasks Undertaken:			
Dominant Hand:	R() L() Both (
Requires glasses:	Y() N()		
Approximate length of time spent at DSE:	1 to 2 Hours ()	3-5 Hours ()	>5 Hours
Other relevant information e.g. discomfort or symptoms or any concerns relating to DSE use raised by the user?			

Sample picture of workstation

Using DSE Safely



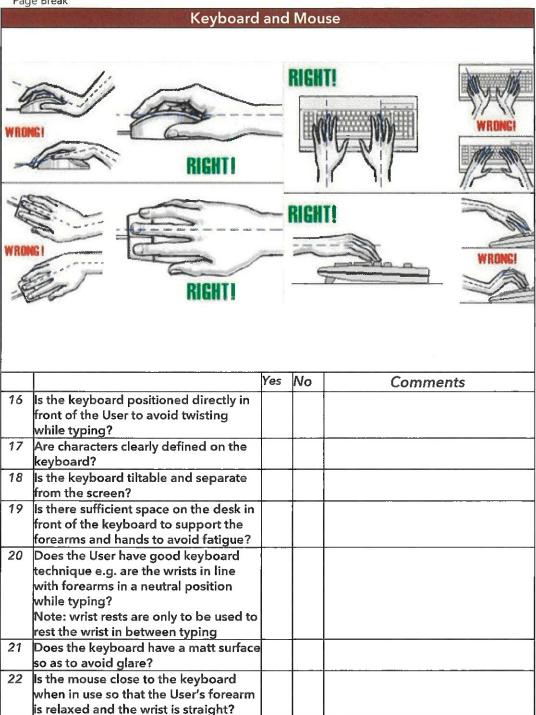
While seated ensure the following:

- (1) Your back is straight and the lower back is supported by the backrest.
- Your thighs are parallel to the floor in a slightly downward position.
- Your feet are resting comfortably on the floor (if not possible, a footrest may be required).
- Your forearms and wrists are in a straight line while typing, your shoulders are relaxed.
 - Eyes are level with top of screen or slightly below eye level.
- The screen is approximately at arm's length and is positioned to avoid reflective glare.
- Keyboard is directly in front of you with enough space to rest forearms on the desk between keyboard and desk edge.

Part	B Ea	uipm	ent	
and the second	Chair	Yes		Comments
1	Is the work chair stable i.e. has a five star			
	base and stable when weight is placed on it?			
2	ls the seat height adjustable?			
	Does the chair allow freedom of movement (in and out of the workspace easily and turn from side to side while seated) and allow for seating in a comfortable position?			
	Is the backrest adjustable in height and tilt to provide lower back support?			
	If arm rests are present, are they adjustable/ removable?			
7	Has the chair been adjusted to ensure while seated: The back is in an upright or slightly reclined position? Shoulders are relaxed? Small of the back is supported? There is a 90 degree angle at knees and elbow? Thighs horizontal or positioned slightly downward? Upper arms are vertical and close to the sides of the body while typing? Forearms horizontal with the desk? Are the feet resting comfortably on the floor? If not, is a footrest provided? Is the User aware of how to adjust the chair in order to find the best posture in accordance with their work?			
THE STATE OF	Scree	n		· · · · · · · · · · · · · · · · · · ·
			No	Comments
	Is the screen positioned directly in front of the User?			Comments
	Is the screen an adequate distance (approximately arm's length) from the User?			
	ls the screen adjustable in height and swivel/tilt?			
	ls the Users' eye-line in the upper third of the screen?			
	Are the characters on the screen well defined, clearly formed and of adequate size and spacing to ensure letters and numerals are clearly distinguishable?			

14	Are the images on the screen stable and		
	free from flickering?		
15	Is the screen clean with brightness and		
	contrast adjustable?		

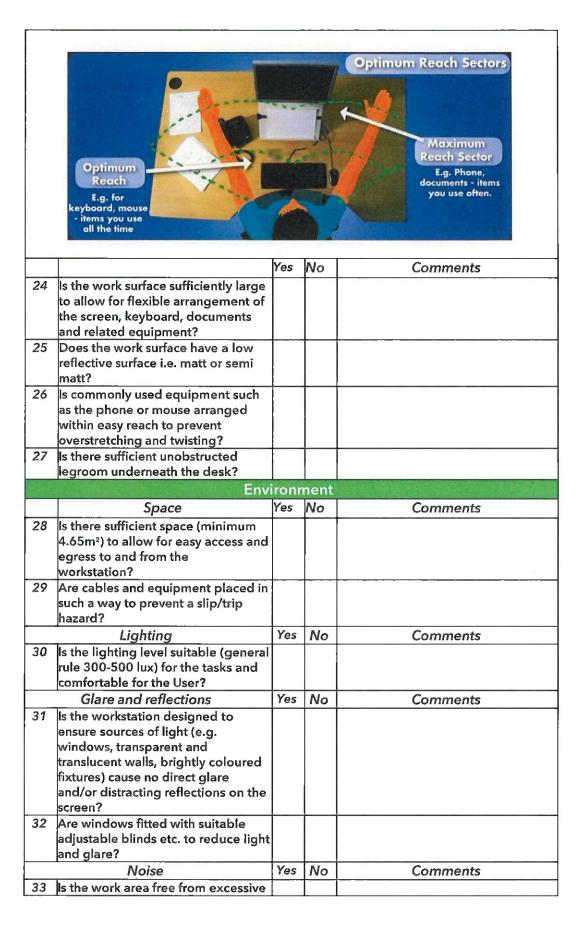
Page Break



Page Break

23 Is a mouse mat required?

Desk



	noise from equipment?			
Heat		Yes	No	Comments
34	Is the work area well ventilated?			
35	Is the work area free of draughts?			
36	Is heat produced by equipment at a level that is comfortable for the User?			
<i>37</i>	Is the ambient temperature (for sedentary work in the range of 18 - 24°C) comfortable for the DSE User?			
	Humidity			
38	Are adequate levels of humidity (minimum of 30 % winter and 40- 60% in summer) maintained?			
	User/ Con	pute	er Int	erface
		Yes	No	Comments
39	Is the User familiar with the computer software programmes they are required to use to perform			
	their tasks?			
40	Does the User consider the software suitable to the task undertaken?			
41	Has the User been provided with training and instruction on the software, as appropriate, in order to perform tasks?			
42	Has consideration been given to the use of a document holder?			
43	If present, is the document holder and the monitor at the same height and angle to minimise head and neck movement?			
44	ls work planned to allow for periodic task breaks or changes of routine away from the DSE?			
45	Has consideration been given to the psychosocial risk factors that may be present e.g. control over pace and nature of tasks, monotonous work, high levels of attention and concentration required, frequent tight deadlines?			
46	Is the User aware of their entitlement to eye and eye sight testing and where appropriate, provision of free corrective lenses?			
47	Is the User aware of how to report any issues relating to the use of DSE?			

PART 3

3.3 SAFE OPERATING PROCEDURES

It is the policy of DGD PAPERS LIMITED to ensure that tasks are within the competencies and capacity of the Employee. The system of work is designed with that in mind.

Following Risk assessment of operations it is clear that some processes give rise to risks which can only be controlled by good practice and adherence to Safe Operating Procedure's.

As with all operations only trained and competent personnel shall perform operations. The posting of a Safe Operating Procedure does not replace the need for proper training but rather acts as a quick reference and works instruction to safely execute a job function.

All employees must adhere to the relevant Safe Operating Procedure when carrying out a task. When a job function cannot be performed in adherence to the relevant Safe Operating Procedure all work must cease until alternative safe arrangements are made.

Employees must be familiar with the relevant Safe Operating Procedures for their work area.

Safe operating procedures are detailed in 'Employee Safety Training Handbook' and are also posted as required in production areas.

Operating Procedure: Persona Baler

No of operatives: 3

- 1. Panel Operator
- 2. Loading Operators x 2
- 3. Forklift Driver

Hazards:

- Electricity
- Conveyors
- Baler
- Needles
- Forklift
- Trucks Unloading

Functions of Operatives:

Panel Operator

- 1. Follow proper procedures when powering up machine.
- 2. Monitor all functions of conveyor and baler.
- 3. Switch off conveyor / baler in the event of blockage or mechanical fault.
- 4. Maintain overall control of production

Loading Operator

- 1. Ensure that he is wearing visible jacket and safety boots at all times.
- 2. Ensure that only suitable materials are fed into conveyor.
- 3. Not to enter conveyor while machine is on under any circumstances.

Forklift Driver

- 1 Ensure that he is wearing visible jacket and safety boots at all times.
- 2 Ensure use of PPE such as googles and ear defenders as necessary
- 3 Ensure that only suitable materials are sent to the Baler sump.
- Not to enter shredder/conveyor/baler while machine is on under any circumstances.
- 5 Inform Panel Operator of any issues
- 6 Hit Emergency Stop Button in the event of any problem/issue
- 7 Take regard of where loading operators are at all times
- 8 Adhere to safe operating procedures for the forklift

OPERATING PROCEDURES FOR PERSONA BALER

SAFETY REGULATIONS

1(4)

- > THE INSTRUCTION BOOK WITH SAFETY REGULATIONS MUST AT ALL TIMES BE AVAILABLE TO THE OPERATING PERSONNEL.
- > THE PLANT MAY ONLY BE STARTED AND OPERATED BY DULY INSTRUCTED PERSONNEL.

It is important that all personnel making service and adjustments to the plant are duly instructed. The operator/s and other personnel must take due note of the safety regulations.

The electric system contains highly dangerous voltage. An authorised electrician must carry out all work on the electric system.

- IT IS PROHIBITED TO START THE MACHINE IF SAFETY GUARDS ARE REMOVED.
- > IT IS PROHHIBITED TO STAY INSIDE, ON OR UNDER THE BALER AND THE CONVEYOR WHEN IN OPERATION.
- > THE MAIN SWITCH MUST BE TURNED OFF AND LOCKED DURING SERVICE TO THE PLANT.

Before making any service, adjustments or other work on the baler or the conveyor the main switch must be turned off and locked. Each person working on the plant must have an individual padlock to the main switch. However, an expectation to this restriction is all work at the needle frame, the twisting unit and the wirepuller. When the safety guards in front of these parts are opened, all strapping- and pressing movements are stopped. The main motor, the material distributor and the conveyor keep on going.

When the safety guards are quite you may correct wire breaks and make smaller adjustments without stopping the baler completely.

<u>Please note!</u> It is absolutely not allowed to step on the conveyor when the plant is in operation. It is also prohibited to step on the service platform of the material distributor when the plant is in operation.

<u>Please note!</u> When the baler is in operation but waiting for material from the conveyor, it is possible to program the motor of the hydraulic unit to stop (to save energy). In this position the motor and the pressing movements can start without previous warning.

SAFETY REGULATIONS 2(4)

DOORS TO PREPRESS CHAMBER AND PREPRESS GUARD MAY ONLY BE OPENED WITH PREPRESS IN ITS LOWER OR UPPER POSITIONS. Even if the baler is closed, the prepress might slowly move backwards and downwards. It is prohibited to open the doors of the prepress chamber or the prepress guard if the prepress is not in its lower or upper positions.

> <u>CAUTION!</u> PROTECT FINGERS, HANDS WHEN HANDLING THE STRAPPING WIRE WHILE PLANT IS IN OPERATION.

Always stop the machine before working with the strapping wire. Fingers, hands and clothes are easily got stuck in a wire loop. The wire leads are sharp and might cause damages. Use protective gloves and safety goggles. If big and high wire coils are used they should be placed on an even and stabile floor. Deformed and incorrectly place wire coils might cause damages if they fall.

> IT IS PROHIBITED TO USE THE PLANT FOR PRESSING MATERIAL THAT MIGHT CAUSE DAMAGE TO THE OPERATING PERSONNEL, THE MACHINE OR THE ENVIRONMENT.

It is prohibited to use the baler for pressing material that might cause explosion, fire, corrosion or other damages to the machine, the operating personnel or the environment. When pressing dusty material the personnel should use breathing protection.

<u>CAUTION!</u> RISK OF FIRE AND SKIDDING IN CASE OF AN OIL SPILL. AVOID ACCIDENTS – PREVENT OIL SPILLS TO DRAINS.

Always wipe off oil spill to prevent risk of fire and skidding. Prevent oil spill to drains or nature. Read the instructions of the oil deliverer about health risks when handling oils.

> THE MATERIAL DISTRIBUTOR MAY NOT BE RETRACTED UNTIL 30 SECONDS AFTER IT IS TURNED OFF. MAKE REGULAR INSPECTIONS OF THE BOLTS OF THE MATERIAL DISTRIBUTOR AND ENSURE THAT THE PROPELLOR IS FREE FROM BIT OF WIRE AND STRING.

It prohibited to retract the material distributor until the propeller has stopped. It takes ab. 30 seconds. Make regular inspections of the bolts of the propeller and the material distributor. If necessary fasten the nipples. Make also regular inspections that the V-belts are correctly tightened (not all models have V-belts). Slipping V-belts might cause fire. When the material distributor is retracted always make sure that the propeller is free from its wire and string. Remove all contraries from the propeller to prevent fire risk.

SMOKING IS NOT ALLOWED! RISK OF FIRE!

Smoking is not allowed on the plant. Dusty environment always causes fire risk.

SAFETY REGULATIONS 3(4)

> CARE AND MAINTENANCE

Make regular controls of the temperature and the pressure in the hydraulic system. Too high temprature or too high pressure might cause damage to personnel

equipment. Keep the plant tidy and clean. Avoid damages on safety guards and safety details. If damages should arise on parts that might affect the security these should be corrected at once. Only use genuine parts of being approved by Persona.

> ALTERATIONS OF THE PLANT

No alterations, mechanical, hydraulic or electrical may be made to the plant without a written consent from Persona.

Do not change the placement of switching equipment. Always place the control panel of the baler where you have a good survey of the start of the baler. Place the control unit to retract the material distributor where you can see the material distributor and the control panel of the conveyor where you can see the conveyor.

Operating Procedure: Lindemann Shredder

No of operatives: 3

- 1 Baler Panel Operator & Shredder Operator
- 2 Loading Operators x 2
- B Forklift Driver

Hazards:

- Electricity
- Conveyors
- Shredder
- Baler
- Needles
- Forklift
- · Trucks Unloading

Functions of Operatives:

Panel Operator

- 1 Follow proper procedures when powering up machine.
- 2 Monitor all functions of conveyor, baler & Shredder.
- 3 Switch off conveyor / baler in the event of blockage or mechanical fault.
- 4 Switch off shredder in the event of blockage or mechanical fault
- 5 Maintain overall control of production
- 6 Maintain oversight of shredding activities at all times

Loading Operator

- 1 Ensure that he is wearing visible jacket and safety boots at all times.
- 2 Ensure use of PPE such as googles and ear defenders
- 3 Ensure that only suitable materials are fed into shredder.
- 4 Not to enter shredder/conveyor/baler while machine is on under any circumstances.
- 5 Inform Panel Operator of any issues
- 6 Hit Emergency Stop Button in the event of any problem/issue

Forklift Driver

- 1 Ensure that he is wearing visible jacket and safety boots at all times.
- 2 Ensure use of PPE such as googles and ear defenders
- 3 Ensure that only suitable materials are sent to the shredder platform.
- 4 Not to enter shredder/conveyor/baler while machine is on under any circumstances.
- 5 Inform Panel Operator of any issues
- 6 Hit Emergency Stop Button in the event of any problem/issue
- 7 Take regard of where loading operators are at all times
- 8 Adhere to safe operating procedures for the forklift

OPERATING PROCEDURES FOR LINDEMANN SHREDDER

(To be carried out and adhered to in conjunction with Baler Operating Procedures)

SAFETY REGULATIONS

1(4)

- > THE INSTRUCTION BOOK WITH SAFETY REGULATIONS MUST AT ALL TIMES BE AVAILABLE TO THE OPERATING PERSONNEL.
- > THE PLANT MAY ONLY BE STARTED AND OPERATED BY DULY INSTRUCTED PERSONNEL.

It is important that all personnel making service and adjustments to the plant are duly instructed. The operator/s and other personnel must take due note of the safety regulations.

The electric system contains highly dangerous voltage. An authorised electrician must carry out all work on the electric system.

- > IT IS PROHIBITED TO START THE MACHINE IF SAFETY GUARDS ARE REMOVED.
- > IT IS PROHHIBITED TO STAY INSIDE, ON OR UNDER THE BALER AND THE CONVEYOR AND THE SHREDDER WHEN IN OPERATION.
- > THE MAIN SWITCH MUST BE TURNED OFF AND LOCKED DURING SERVICE TO THE PLANT.

Before making any service, adjustments or other work on the shredder the main switch must be turned off and locked. Each person working on the plant must have an individual padlock to the main switch. The panel operator acts as supervisor to works being carried out. It is the panel operators' responsibility to allow/deny access to the machine for service/adjustments/other works if it is in his/her opinion that it is safe/unsafe to do so.

<u>Please note!</u> It is absolutely not allowed to step on the conveyor when the plant is in operation. It is also prohibited to step on the service platform of the material distributor when the plant is in operation.

<u>Please note!</u> When the baler is in operation but waiting for material from the conveyor, it is possible to program the motor of the hydraulic unit to stop (to save energy). In this position the motor and the pressing movements can start without previous warning.

<u>Please note!</u> When the shredder is in operation attention must be paid to the safe zones around the machine. It is prohibited to go closer to the machine than as allowed in the safe zone markings. The machine when powering up and down takes considerable time to do so, entry into the safe zones is prohibited until the machine is fully wound down. The panel operator's permission must be attained before going near the machine.

SAFETY REGULATIONS 2(4)

> DOORS TO THE GRID AND ROTOR WHERE THE BLADES ARE MAY ONLY BE OPENED WHEN POWER TO THE SHREDDER HAS BEEN ISOLATED AND POWERED DOWN FOR AT LEAST 60 MINUTES SAVE AND EMERGENCY

Even if the shredder is powered off, it is imperative that power to the machine is isolated before access can be granted. After operation the machine must be powered down for at least 60 minutes to guarantee moving parts are no longer a hazard. Access can only be granted in less time in the event of an emergency and by authorised staff only.

> CAUTION! MOVING PARTS ON THE FEED CONVEYOR

When the shredder is in operation, material is fed through a small feed conveyor at waist level. No loose clothing is to be worn; no chains or items that may get caught in the moving parts of the conveyor are allowed. Material for processing must be deposited on the conveyor in accordance with safe lifting procedures.

> IT IS PROHIBITED TO USE THE PLANT FOR PRESSING MATERIAL THAT MIGHT CAUSE DAMAGE TO THE OPERATING PERSONNEL, THE MACHINE OR THE ENVIRONMENT.

It is prohibited to use the shredder for pressing material that might cause explosion, fire, corrosion or other damages to the machine, the operating personnel or the environment. When processing dusty material the personnel should use breathing protection.

<u>CAUTION!</u> RISK OF FIRE AND SKIDDING IN CASE OF AN OIL SPILL. AVOID ACCIDENTS – PREVENT OIL SPILLS TO DRAINS.

Always wipe off oil spill to prevent risk of fire and skidding. Prevent oil spill to drains or nature. Read the instructions of the oil deliverer about health risks when handling oils.

<u>CAUTION!</u> DEBRIS/FOREIGN OBJECTS EXPELLED FROM THE SHREDDER WHILE SHREDDER IS IN OPERATION

Ensure insofar as is practicable no foreign object(s) enter the shredder that might cause fire or damage or be expelled back out causing harm to operators. PPE must be worn such as Eye protection, ear defenders, Steel Capped Boots, High Visibility Clothes and work wear.

CAUTION! THE OPERATOR MUST ENSURE NO METAL OR AEROSOLS ENTER THE SHREDDER AS THERE IS A POTENTIAL FIRE & DAMAGE RISK

It is prohibited for metals and aerosols to enter the shredder. This is a common risk with all shredders. In the event metal or aerosols enter the shredder the shredder must be switched off immediately. The hydraulics must be left on, as this allows the dust suppression and fire extinguishing system to operate. The operator must ascertain the seriousness of the situation. If there is a high probability of a serious fire the operator must call 999 or 112 for the Fire Brigade.

> SMOKING IS NOT ALLOWED! RISK OF FIRE!

Smoking is not allowed on the plant. Dusty environment always causes fire risk.

SAFETY REGULATIONS 3(4)

> CARE AND MAINTENANCE

Avoid damages on safety guards and safety details. If damages should arise on parts that might affect the security these should be corrected at once. Only use genuine parts of being approved by Lindemann.

> ALTERATIONS OF THE PLANT

No alterations, mechanical, hydraulic or electrical may be made to the plant without a written consent from **Recyling Engineering Service**.

Do not change the placement of switching equipment. Always place the control panel of the baler where you have a good survey of the start of the baler, Conveyor and Shredder. Place the control unit to retract the material distributor where you can see the material distributor and the control panel of the conveyor where you can see the conveyor.

Operating Procedure: Mobile Shredding Unit (Tornado Shredder)

No of operatives: 1/2

- 1 Driver/Operator
- 2 2nd Operator/Operative

Hazards:

- Shredder
- Bin Lifter

Functions of Operatives:

Driver/Operator

- 1 Follow proper procedures when powering up machine.
- 2 Monitor all functions of Tornado Shredder.
- 3 Switch off shredder in the event of blockage or mechanical fault.
- 4 Switch off shredder in the event of problems with Bin Lifter.
- 5 Maintain overall control of shredding process
- 6 Maintain oversight of shredding activities at all times
- 7 Have overall responsibility for shredding

2nd Operator/Operative

- 1 Follow proper procedures when powering up machine.
- 2 Monitor all functions of Tornado Shredder.
- 3 Switch off shredder in the event of blockage or mechanical fault.
- 4 Switch off shredder in the event of problems with Bin Lifter.
- 5 Assist Driver/Operator in carrying out his/her functions

OPERATING PROCEDURES FOR MOBILE SHREDDING UNIT (TORNADO SHREDDER)

SAFETY REGULATIONS

1(4)

- > THE INSTRUCTION BOOK WITH SAFETY REGULATIONS MUST BE AVAILABLE TO THE OPERATING PERSONNEL.
- > THE PLANT MAY ONLY BE STARTED AND OPERATED BY DULY INSTRUCTED PERSONNEL.
- INSOFAR AS IS PRACTICABLE PARTICULAR OPERATOR(S) WILL BE ASSIGNED TO OPERATE THE MACHINE (CURRENTLY ASSIGNED: DENIS NOONAN, MARK DOUPE, KEN MCKENNA)

It is important that all personnel making service and adjustments to the plant are duly instructed. The operator/s and other personnel must take due note of the safety regulations.

- IT IS PROHIBITED TO START THE MACHINE IF SAFETY GUARDS ARE REMOVED.
- > IT IS PROHIBITED TO STAY INSIDE THE SHREDDER WHEN IN OPERATION.
- > THE ENGINE MUST BE TURNED OFF AND KEYS FOR THE INGITION REMOVED DURING SERVICE TO THE PLANT.

Before making any service, adjustments or other work on the shredder the engine must be turned off and cab of the truck locked. The Driver/operator acts as supervisor to works being carried out. It is the driver/operators' responsibility to allow/deny access to the machine for service/adjustments/other works if it is in his/her opinion that it is safe/unsafe to do so.

<u>Please note!</u> It is absolutely not allowed open the shredder door when the shredder is in operation, winding up or in the process of being wound down.

<u>Please note!</u> When the mobile shredding unit is in operation the bin lift mechanism moves up and down the side of the vehicle. It is essential that this process is supervised at all times.

<u>Piease note!</u> In the event of any mechanical issue or otherwise whilst on-site due regard to health and safety must be paid at all times.

SAFETY REGULATIONS 2(4)

DOORS TO THE GRID AND ROTOR WHERE THE BLADES ARE MAY ONLY BE OPENED WHEN POWER TO THE SHREDDER HAS BEEN ISOLATED AND POWERED DOWN FOR AT LEAST 10 MINUTES SAVE AN EMERGENCY

Even if the shredder is powered off, it is imperative that power to the machine is isolated before access can be granted. After operation the machine must be powered down for at least 10 minutes to guarantee moving parts are no longer a hazard. Access

can only be granted in less time in the event of an emergency and by authorised staff only.

> CAUTION! MOVING PARTS ON THE BIN LIFT MECHANISM

When the Bin Lift Mechanism is in operation, all personal should be aware of it. A safe distance must be kept when it is moving up and down. The Operator has responsibility to control this process and pay attention to persons around him/her.

> CAUTION! THE OPERATOR MUST ENSURE NO METAL OR AEROSOLS ENTER THE SHREDDER AS THERE IS A POTENTIAL FIRE & DAMAGE RISK

It is prohibited for metals and aerosols to enter the shredder. This is a common risk with all shredders. In the event metal or aerosols enter the shredder the shredder must be switched off immediately. The hydraulics must be left on, as this allows the dust suppression and fire extinguishing system to operate. The operator must ascertain the seriousness of the situation. If there is a high probability of a serious fire the operator must call 999 or 112 for the Fire Brigade.

CAUTION! RISK OF FIRE AND SKIDDING IN CASE OF AN OIL SPILL. AVOID ACCIDENTS – PREVENT OIL SPILLS TO DRAINS.

Always wipe off oil spill to prevent risk of fire and skidding. Prevent oil spill to drains or nature. Read the instructions of the oil deliverer about health risks when handling oils.

<u>CAUTION!</u> DEBRIS/FOREIGN OBJECTS EXPELLED FROM THE SHREDDER WHILE SHREDDER IS IN OPERATION

Ensure insofar as is practicable no foreign object(s) enter the shredder that might cause fire or damage or be expelled back out causing harm to operators. PPE must be worn such as Eye protection, ear defenders, Steel Capped Boots, High Visibility Clothes and work wear.

SMOKING IS NOT ALLOWED! RISK OF FIRE!

Smoking is not allowed on the plant. Dusty environment always causes fire risk.

SAFETY REGULATIONS 3(4)

> CARE AND MAINTENANCE

Avoid damages on safety guards and safety details. If damages should arise on parts that might affect the security these should be corrected at once. Only use genuine parts of being approved by Tornado.

Part 4

Accident Report Form (IR forms) Internal



Form No: EP020A

Accident Report Form					
Date & Time of Incident:	/				
I cladita involveu.					
Person in Charge:	-				
Location:					
					•
				• • •	
Description of the					
Incident:					
mcident:					
Nature of Injury/					
Damage					
Work being carried					
out at the time:					
					-
Witness Details					
(Contact No)					
					•
					•

PPE & Protective					
Guards in Place					
At the time:	=				
-					
Actions Taken:					
-					
-	#				
-					
			_		
Any other					
Information:					
-		_			
091					
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For Official Use Only:	22	Follow Up/ Act	ions Take	n:	
			Yes	No	N/A
Received by:		CAR			
		HSA Notified			
			-		
Managing Director / Director	or				

Accident Report Form External

Accident/Incidents can be reported online to the HAS by following this link and registering online.

https://webapps.hsa.ie/CIRW/index.php

Reportable accidents

The following is taken from the HAS's website at: http://www.hsa.ie/eng/Topics/Accident_and_Dangerous_Occurrence_Reporting/

Accident Reporting Frequently Asked Questions

What Types of Accidents Must be Notified to

the Health and Safety Authority?

How do I Report an Accident to the Health

and Safety Authority?

What Regulations Apply to the Reporting of

Accidents?

Road Traffic/ Vehicle Accidents Involving

Employees and Self-Employed

General Injuries Involving Members of the

<u>Public</u>

Who is Responsible for Notifying Accidents to

the Health and Safety Authority?

What is the Procedure for Notifying a Fatal

Accident to the Health and Safety Authority?

What Types of Accidents Must be Notified to the Health and Safety Authority?

- General injuries involving employees and self-employed Accidents, where a person is injured at a place of
 work and cannot perform their normal work for more than 3 consecutive days, not including the day of the accident,
 are reportable.
- Road traffic/ vehicle accidents involving employees and self-employed Such accidents are reportable if the person was injured while driving or riding in the vehicle in the course of work, and cannot perform their normal work for more than 3 consecutive days, not including the day of the accident.
- General injuries involving members of the public

 Accidents related to a place of work or a work activity where a person requires treatment from a medical practitioner

Accidents related to a place of work or a work activity where a person requires treatment from a medical practitioner are reportable.

Accidents related to medical treatment or a pre-existing medical condition are not reportable.

Road traffic/vehicle accidents involving members of the public

Road traffic accidents are only notifiable if they relate to vehicle loads or to the construction or maintenance of roads or structures adjacent to roads.

General injuries involving employees and self-employed

If I get injured on a Wednesday and return to work on Monday is it reportable?

Yes, because the person is absent from work for more than 3 consecutive days, the accident is reportable (even if the employee does not normally work on a week-end, the Saturday and Sunday are counted).

If I hurt my back on a Monday and return to work on Thursday but am given light duties for the next week is it reportable?

Yes, even though you were not absent for more than 3 days you could not perform your normal work for more than 3 days.

If I get injured on Monday and return to work on Friday is it reportable? No, you must be absent for more than 3 days, not including the day of the injury.

If I hurt my back on a Monday and return to work on Thursday but am unable to work on Friday is it reportable?

No, you were not out of work for more than 3 consecutive days

If I get injured on Monday and return to work on Friday is it reportable? No, you must be absent for more than 3 days, not including the day of the injury.

If I hurt my back on a Monday and return to work on Thursday but am unable to work on Friday is it reportable?

No, you were not out of work for more than 3 consecutive days back to top

How do I Report an Accident to the Health and Safety Authority? Online Reporting

You can report accidents online by clicking on the on the homepage and several other pages of the HSA website and registering.

The benefits of reporting online are:

Report an Accident online

- It is faster than filling in and posting the paper IR1 form
- You can view details of all the accidents you reported online over the last year
- You can print a copy of the report for your records
- You get a confirmation receipt by e-mail for each accident you report.
- Account activation codes are sent to Health and Safety Managers when a new user registers for their organisation so:
- . They can view details of all accidents reported online for their organisation over the past year.
- Receive an e-mail notification every time a new user registers to report accidents for their organisation.

Reporting on Paper IR1 Form.

- Employers can report accidents on the official IR1 Form
- The HSA only accept the pre-printed forms published by the Authority photocopies are not acceptable
- Copies of the IR1 form are available from the Publications Section of the HSA by Telephoning 1890 289 389 or if calling from outside of the Republic of Ireland +353 1 6147000 back to top

What Regulations Apply to the Reporting of Accidents?

The Safety Health and Welfare at Work (General Application) Regulations, 1993

Extracts are included below:

58. Interpretation of Part X:

'responsible person' means:

- a. in the case of any event required to be reported under Regulation 59 involving an employee at work, his employer;
- b. in any other case, except where subparagraph (c) applies, the person having control of a place of work for the purpose of any trade, business or undertaking (whether for profit or not) at which the accident or dangerous occurrence required to be reported under Regulation 59 occurs; and
- c. where a self-employed person is fatally injured at a place of work, the person who owns the place of work or, in the case of a tenancy existing in respect of the place of work, the tenant or, in a case where the fatally injured person is the owner or tenant, the next of kin.
- (2) In this Part, a reference to an accident or a dangerous occurrence arising at or in connection with work includes a reference to an accident or dangerous occurrence which is attributable to the manner of conducting the undertaking concerned or to any article or substance used for the purposes of the undertaking concerned or to the condition of any part of the place of work where the undertaking concerned is carried on.
- 59. Notification of Accidents and Dangerous Occurrences:
- (1) Where:

- a. any accident occurs at a place of work as a result of which any person carrying out work at that place of work dies or is prevented from performing his normal work for more than three consecutive days, excluding the day of the accident but including any days which would not have been working days, or
- b. in the case of any person who is not at work but who as a result of an accident related to a place of work or a work activity dies or suffers any injury or condition as a result of an accident which results in the person requiring treatment from a registered medical practitioner or treatment in a hospital as an in-patient or an out-patient, or
- c. there is a dangerous occurrence, the responsible person shall:
- i. in the case of a death, supply the Authority by the quickest practicable means with the name of the deceased, brief particulars and the location of the accident, and
- ii. as soon as practicable send a written report in the approved form to the Authority of the death, injury, condition, accident, or dangerous occurrence.
- (2) Where as a result of an accident at work an employee or a self-employed person sustains an injury or suffers a condition which is required to be reported under this Regulation to the Authority, and as a result of that accident the employee or self-employed person dies within a year of the accident, the responsible person shall, as soon as possible after the death comes to his knowledge, inform the Authority in writing of the death, whether or not the accident has been reported under paragraph (1).
- (3) In the case of a responsible person who is a self-employed person, it shall be sufficient compliance with paragraph (1) if the self-employed person makes arrangements with some other person for that other person to make the notification or report required by that paragraph on behalf of the self-employed person.

(4)

- a. Where an accident which is notifiable under paragraph (1) occurs and causes loss of life to a person no person shall disturb the place where it occurred or tamper with anything thereat before;
- i. that place has been inspected by an inspector, or
- ii. the expiration of three clear days after notification, in accordance with paragraph (1), of the accident.
- b. Nothing in this Regulation shall prohibit the doing of anything by or with the consent of an inspector.
- c. In any proceedings taken in respect of a contravention of this paragraph consisting of the doing of any act, it shall be a defence to prove that the doing of the act was necessary for securing the safety or health of any person.
- 61. Application of this Part:
- (1) The provisions of Regulation 59 relating to a death, injury or condition do not apply to a person who, at the time death occurs or injury is sustained or a condition is suffered, is a patient undergoing treatment in a hospital or in a doctor's or dentist's surgery and is not undergoing treatment for an accident at a place of work or for an injury due to a dangerous occurrence, unless the cause of death or injury is unrelated to the patient's pre-existing medical condition or the treatment being provided.
- (2) The provisions of Regulation 59 relating to the death, injury or condition of a person as a result of an accident shall, in the case of an accident arising out of or in connection with the movement of a vehicle on any public road, apply only if that person:
- a. was killed or suffered an injury as a result of driving or riding a vehicle in the course of work, or
- b. was killed or suffered an injury or condition as a result of exposure to a substance or injury from an article being conveyed by a vehicle,
- c. was either himself engaged in, or was killed or suffered an injury or condition as a result of the activities of another person who was at the time of the accident engaged in, work connected with the loading or unloading of any article or substance onto or off a vehicle, or
- d. was either himself engaged in, or killed or suffered an injury or condition as a result of the activities of another person who was at the time of the accident engaged in, work on or alongside a road, being work concerned with the construction, demolition, alteration, repair or maintenance of:
- i. the road or the markings or equipment thereon;
- ii. the verges, fences, hedges or other boundaries of the road;
- iii. pipes or cable on, under, over or adjacent to the road; or
- iv. buildings or structures adjacent to or over the road.

back to top

Road Traffic/ Vehicle Accidents Involving Employees and Self-Employed

If I am a driver or a passenger and am involved in a road traffic accident and am out of work for more than 3 days is it reportable?

Yes, if you were injured while driving or riding in the vehicle in the course of work

If I am at work and am injured by part of the load on a lorry is it reportable? Yes, provided that you could not perform your normal work for more than 3 days.

If I am at work and am injured as the result of the loading or unloading of a lorry is it reportable?

Yes, provided that you could not perform your normal work for more than 3 days.

If I am a driver who is injured when my lorry rolls over my foot in the yard of a customer.is it reportable?

Yes, provided that you could not perform your normal work for more than 3 days.

If I am at work and am injured as a result of roadway construction or maintenance activities is it reportable?

Yes, provided that you could not perform your normal work for more than 3 days.

If I am a driver who is injured when my lorry rolls over my foot on a public road, is it reportable?

No, it is reportable only if you are driving or a passenger if you are on a public road.

If I am driving to or from my home in my company van and am injured is it reportable?

No, commuting accidents are not reportable, unless your home is the base from which you normally work

If I am a mechanic repairing a car on the road-side and am hit by a vehicle is it reportable?

No, it is reportable only if you are driving or a passenger.

If I am injured by part of the load on a lorry is it reportable? Yes, provided you required medical treatment

If I am injured as the result of the loading or unloading of a lorry is it reportable?

Yes, provided you required medical treatment

back to top

General Injuries Involving Members of the Public

If a piece of plywood is blown off a construction site and injured me as I walked along the footpath is it reportable?

Yes, provided you required medical treatment. The injury was related to a place of work.

Other types of accidents

If I slip on a grape in a supermarket is it reportable?

Yes, provided you required medical treatment. Where it is the policy of the supermarket to advise everyone who suffers an accident to "see a doctor" but you do not actually require treatment, it is not reportable.

If I am injured in a fall out of a bed in a hospital is it reportable?

Yes, provided you required medical treatment as a result of the fall and the fall was not related to medical treatment or a pre-existing medical condition

If I am a hospital patient and suffer an injury due to adverse reaction to drugs is it reportable?

No, injuries to patients related to a medical treatment or a pre-existing medical condition are not reportable

If I am injured by inappropriate treatment by a medical practitioner is it reportable?

No, injuries to patients related to a medical treatment or a medical condition are not reportable

If I am injured as a result of roadway construction or maintenance activities is it reportable?

Yes, provided you required medical treatment and the activities were ongoing at the time of the injury

If I am injured as a result of roadway construction or maintenance activities is it reportable, even if there is no-one on site at the time of the accident? Yes, provided you required medical treatment and the roadworks project was ongoing at the time of the injury

If I am a member of the public who is injured by a work vehicle, including a bus, is it reportable?

No, unless you are riding in the vehicle in the course of work

If I am driving and I lose control on loose gravel is it reportable?

No, unless the loose gravel on the road is the result of the activities of a person who was working on the construction or maintenance of the road at the time of the injury.

back to top

Who is Responsible for Notifying Accidents to the Health and Safety Authority?

In the case of an accident involving an employee at work, the employer is responsible for reporting the accident.

In any other case (if the injured person is self-employed or a member of the public), the person responsible for reporting the accident is the person having control of the place of work at which the accident occurred including persons providing training (in the case of death or injury of a person receiving training for employment).

If a self-employed person is fatally injured, the person who is the owner or tenant in the place of work is responsible for reporting the accident. If the fatally injured person is the tenant or owner of the place of work, the next of kin has responsibility for reporting the accident.

Accidents can be reported to the Health and Safety Authority in two ways; namely

(1) by hard copy, i.e completing the Incident Report Form (IR1) and posting the completed form to the Workplace Contact Unit, Health and Safety Authority, The Metropolitan Building, James Joyce Street, Dublin 1, or online, via the Health and Safety Authority's website, www.hsa.ie. Please follow the following link, Report an accident

back to top

What is the Procedure for Notifying a Fatal Accident to the Health and Safety Authority?

The responsible person is required to:

- Supply the Authority with the name of the deceased, location of the accident and brief particulars of the
 accident, by the quickest practicable means.
- Send a written report of the incident, in the approved form, to the Authority as soon as practicable.
 The responsible person should ensure that no person disturbs the accident scene before:
- the scene has been examined by an inspector
- three clear days after notification of the accident

If an injured person dies within a year of the accident, the responsible person is required to notify the Authority in writing as soon as possible after the death comes to their knowledge, even if the incident has not previously been notified to the Authority.

The Gardaí should be notified immediately of all workplace accidents resulting in death.

See more at:

http://www.hsa.ie/eng/Topics/Accident_and_Dangerous_Occurrence_Reporting/#sthash.fARD0b9t.dpuf

DGD Shredding Services Safety Statement



Safety Suggestion Form

Name: Position: Date:
Date:
Area Concerned:
Details:
Signed:
For Official Use Only:
Received By: Date:
Signed on By.

Risk Assessment Template-Actual Risk Assessments

Customer Site: _



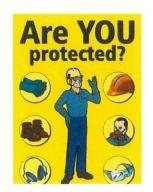
Risk Assessment Form

(Work at a Customers Location) Site & Day Specific

Activity	Hazard	Persons Affected	Degree of Risk: See attached Sheet	Risk Control Measures



Date completed.....



Signed originator...... Job title



Risk Assessments

Risk Rating is used to prioritise Control Actions in order of importance, as follows;

	Slightly Harmful	Harmful	Extremely Harmful
Highly Unlikely	Trivial Risk	Acceptable Risk	Moderate Risk
Unlikely	Acceptable Risk	Moderate Risk	Substantial Risk
Likely	Moderate Risk	Substantial Risk	Intolerable Risk

A basis for prioritising action following Risk Assessment

Risk Level	Action & Timescale
Trivial	No action required
Acceptable	No further action required – but monitoring to continue to ensure control maintained
Moderate	Risk reduction measures implemented within 3 – 6 months
Substantial	Work should not start until risk reduced. For on- going work Corrective measures to be implemented as soon as possible
Intolerable	No work to start & current work to be stopped until risk eliminated

For all questions and queries please contact Michael Garvey on 087 9841982 or

Mark Doupe on 087 6877261 or alternatively contact 1800 491 333





Induction package

- All employees are to be inducted with a PowerPoint presentation outlining the health and safety aspects of the facility.
- Employees must sign a record in recognition of this training and their understanding of the site safety requirements.
- All new site visitors must undergo a site safety presentation. They must sign a record in recognition of this training and their understanding of the site safety requirements also.



Quality, & Environmental Management	IMSP23
Emergency Response Plan	Page: 1 of 4

DATE	REV	REASON FOR CHANGE	ORIGINATOR	APPROVED BY
30 th March 2007	0	Initial release	B Nyhan	L Garvey
10 th May 2011	1	Updated to include reference to MRWCP & WCP	K Fahy	L Garvey
25 th November 2013	2	Update to include reference for Emergency Signage & Remote Monitoring Centre	M Garvey	L Garvey
20 th September 2018	3	Amend to include ISO 9001:2015 & ISO 14001:2015 standard	K Fahy	M Garvey
23/05/20	4	Amend to include new WFP number	K Fahy	M Garvey
12 th January 2022	5	Review & remove reference to Ecojet	K Garvey	M Garvey
28 th April 2022	6	Update Emergency Evacuation Procedure	K Garvey	M Garvey
15 th Nov 2023	7	Review & Update	K Garvey	M Garvey
13 th Nov 2024	8	Review & Update	K Garvey	M Garvey
				+

DGD Shredding Secure Destruction Specialists	Quality, & Environmental Management	IMSP23
	Emergency Response Plan	Page: 2 of 4

1.0 Purpose:

To ensure that emergencies (and potential emergencies) are dealt with efficiently:

- to avoid or at least minimise any injury or damage that might be threatened by an emergency;
- to minimise or avoid impacts on the environment and to minimise disruption to production that might follow.

2.0 Scope:

This procedure covers all aspects of emergency situations and potential emergency situations.

3.0 Responsibilities:

It is the responsibility of the Directors to ensure that this procedure is complied with.

4.0 References:

ISO 14001:2015 8.2 Emergency Test Record IMSF10

Waste Collection Permits NWCPO-11-05669-03
Waste Facility Permit WFP/L/2024/09C/R7

SDS On file

Risk assessments IMSR06 Safety Statement

5.0 Responsibilities:

The Directors are charged with the responsibility of operating an effective emergency plan and for ensuring that it is kept up to date through:

- adequate testing of equipment
- by organising emergency exercises, evacuation drills and fire fighting practices.
- by establishing fire evacuation routes and assembly.

The board of directors carries ultimate responsibility for ensuring that emergencies are coped with effectively. All employees are required to co-operate fully in order to ensure that the company meets their legal obligations as regards emergency planning and emergency action.

6.0 Emergency Procedure-General Approach:

6.1 The Directors will arrange training in the effective use of fire fighting equipment for staff. They will also arrange for all equipment to be examined/tested by the supplier/ maintenance firm at least once every 12 months and keep a formal record of the check.

6.1 Accidental emissions /spillages:

6.1.1 Containment:

DGD Shredding Secure Destruction Specialists	Quality, & Environmental Management	IMSP23
	Emergency Response Plan	Page: 3 of 4

The company operates the following controls:

A-Control of Chemicals/Oils:

Spill trays will be used where appropriate.

B-Chemicals and incompatible materials.

See: Safety Data Sheets.

- incompatible chemicals/oils will be segregated.
- chemicals are stored on a concrete base or on spill trays where appropriate.
- in the event of a spillage the local council will be informed immediately.

C-Prevention of rain ingress, etc., for stored materials.

Chemicals & oils will be stored indoors where appropriate.

D-Preventive Maintenance:

• All equipment with potential impact on the environment will be maintained as per the Preventive Maintenance Plan.

E-Spill kits (sand-granules) and fire extinguishers will be located in strategic locations.

6.1.2 Health & safety of staff and others:

The safety of staff and visitors etc will be of paramount importance at all times.

6.2.2 Emergency Response (In House):

To ensure that an emergency emission/spillage is properly responded to, the following actions must be taken by appropriate personnel:

The most senior person on site must take overall control.

- Consult relevant material data sheet in the case of chemical/liquid emissions and respond accordingly.
- Where possible, spillages will be contained locally by using absorbent material or spill kits in the case of liquids.
- The relevant authority (Limerick City & County Council/EPA) must be informed immediately and the appropriate report documented.
- The reasons for the emergency must be investigated and corrective / preventive action initiated.
- 6.2.3 Procedures will be tested at least annually. Results will be documented and any failure to respond satisfactorily will result in a review of the plan.

6.2.3 Emergency Response (En Route/on sites):

To ensure that an emergency situation en route is properly responded to the following actions must be taken by appropriate personnel:

Emergency signs must be placed in front/behind vehicle.

DGD Shredding Secure Destruction Specialists	Quality, & Environmental Management	IMSP23
	Emergency Response Plan	Page: 4 of 4

- > Consult relevant material data sheet in the case of chemical/liquid emissions and respond accordingly.
- Ensure that the appropriate protective equipment is worn.
- Where possible, spillages will be contained locally by using absorbents material or spill kits in the case of liquids.
- The relevant authority (Local Authority, EPA, Insurance Gardai and Company) must be informed immediately.
- > Incidents and accidents will be recorded on the appropriate DGD forms.

6.2.4 Emergencies outside normal working hours (including holidays):

- A. In the event of an alarm sounding the remote monitoring centre will notify key holders.
- B. The notified key holder will take immediate action appropriate to the emergency and degree of risk.
 - Impact on the environment should be minimized by local containment if possible.
- C. He will contact the appropriate emergency service (fire brigade, doctor etc).
- D. The Directors will be contacted immediately.

6.2.5 Emergency Evacuation Procedure

Emergency Evacuation Plan for:	DGD Shredding	
Premises Address and Contact:	Bay M1, Raheen Business Park,	
	Raheen, Limerick	
Plan Date:	13/11/2024	

Sound of the Alarm
The sound of the alarm will be a continuous warning siren.

Raising of the Alarm

In the Event of a fire beginning:

If the fire is discovered by a staff member, the alarm will be raised by activation of the nearest call point.

If the fire is detected by automatic detectors, this will trigger the alarm.

DGD Shredding Secure Destruction Specialists	Quality, & Environmental Management	IMSP23
	Emergency Response Plan	Page: 5 of 4

Action staff should take on hearing the alarm

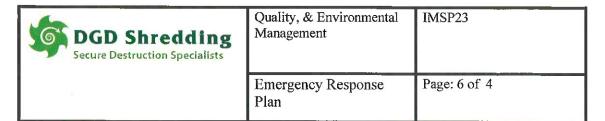
The following actions will be taken upon the fire alarm being sounded:

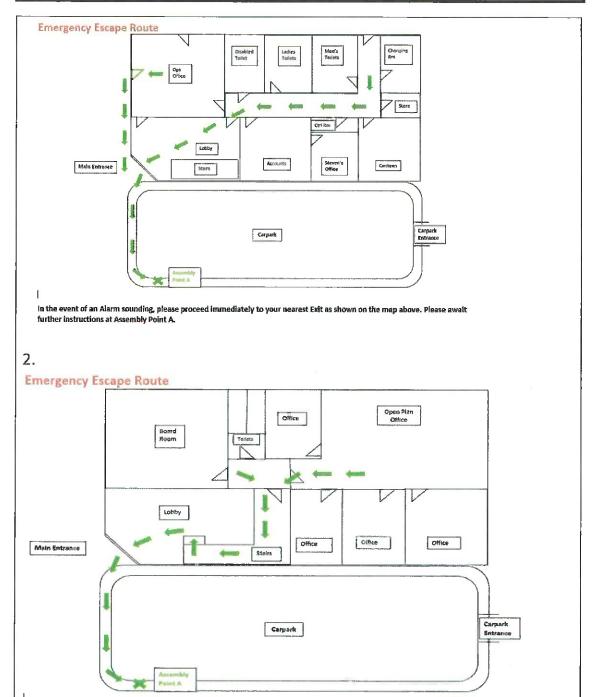
- On hearing the Fire Alarm Building Occupants shall:
 - Evacuate the building immediately via the NEAREST AVAILABLE FIRE EXIT
 - > Comply with all directions given by Fire Wardens
 - Switch off machines (if safe to do so and if it reduces risk to others)
 - Where possible assist less ablebodied persons /visitors to evacuate to safety
 - Proceed to the Fire Assembly Point for the building
 - Remain outside the building until the all clear is given
- On hearing the Fire Alarm, the Fire Wardens shall:
 - > Aid the evacuation.
 - > Sweep and ensure the designated areas are clear.
 - > When evacuating, lead from the back.
 - > Close doors and windows behind them.
 - > Carry out a roll call.
 - > Inform Fire Co-Ordinator.
 - Do not take any risks.
 - ➤ If safe to do, electrical mains and gas supplies should be switched off before leaving the building. The location of these are detailed below.
- On hearing the Fire Alarm, the Fire Co-Ordinator shall:
 - > Call the fire brigade.
 - Liaise with Fire Wardens.
 - Liaise with Fire Service upon their arrival.
 - Co-ordinate extinguishing the fire, with trained staff members, if safe to do so.

Escape Routes & Assembly Points

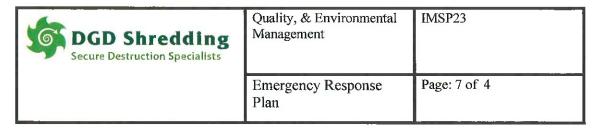
The escape routes from the building and Assembly points are:

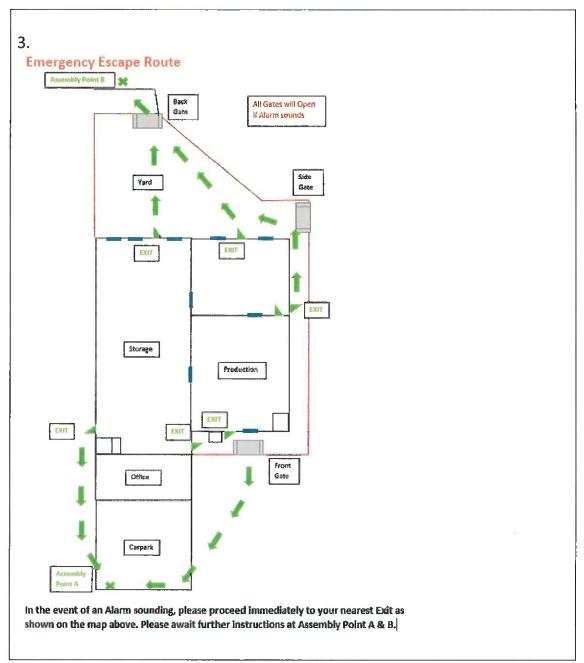
1.





In the event of an Alarm sounding, please proceed immediately to your nearest Exit as shown on the map above. Please await further instructions at Assembly Point A.

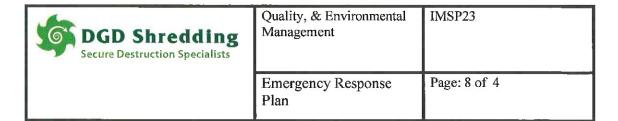




Fighting fires - Extinguisher & Hose use

Fire extinguishers and hoses will only be used where:

- Staff have received training and feel confident in their use.
- Where it is deemed safe to do so, i.e. there is a clear means of escape,



fire is small.

Personal safety always takes priority and, if in any doubt, staff should not attempt to extinguish a fire.

Location of key safety hazards or other fire related equipment

- Mains fuse box: Plant Room
- Gas/oxygen cylinders: Garage
- Location of fire alarm panel: Production Area & Repeater in Ops Office

Number of staff needed to carry out evacuation plan

- To implement the evacuation plan, 3 trained staff are needed on duty.
- Out of hours 2 staff member need to be on duty at all times.

Equipment needed to effect the emergency plan

Mobile phone

Back up arrangements

- In the event of fire alarm failure, then the alarm will be raised manually (verbal).
- In the Event of staff absence, the most senior fire warden will be in charge.

Responsibilities	
For ensuring plan is up to date:	Kelly Garvey
For ensuring adequate staff are on duty	Michael Garvey
to carry out the evacuation plan:	
For training staff on the evacuation plan	Kelly Garvey
and in their roles and responsibilities:	

DGD Shredding Secure Destruction Specialists	Quality, & Environmental Management	IMSP23
	Emergency Response Plan	Page: 9 of 4

6.2.6 Identification of all potential emergencies: This is carried out at the annually management reviews.

7.0 Records:

Environmental records will be retained for a minimum period of 7 years.



Company Policies

Corporate Social Responsibility Policy

We believe that a commitment to the principles of corporate social responsibility (CSR) only makes good commercial sense but complements our company values.

Our policy is based on the following principles:

- To minimise the impact that our work has on the environment and people around us and to be an ambitious leader in sustainability in our industry.
- To be an open and transparent organization for all stakeholders and be a trusted organisation but the public, clients and supplier as well as being a fulfilling workplace for our people.
- To comply with, and exceed where practicable, all applicable legislation, regulations and codes of practice.
- To be an active participant in our community and support both through financial means and involvement & participation in initiatives and charitable organisations.
- To integrate our CSR considerations into all our business decisions.
- To review and to continually strive to improve our CSR performance.

We will actively work to ensure the efficacy of this policy throughout the organisation and will communicate this policy to both internal and external stakeholders.

Ethical Trade Policy

We believe that a commitment to the principles of ethical trade not only makes good commercial sense but complements our company values.

Our policy is based on the following principles:

- To provide our clients with high quality services that do not come at the expense of others through fulfilling our contractual obligations to a high standard to suppliers, customers, business partners and contractors.
- To encourage and develop working relationships based on trust, equal opportunity and nondiscrimination.
- To minimise the impact of our operations on our community, environment and climate.
- To act responsibly in meeting our obligations to health & safety, working with regulators and government agencies, and adhering to all applicable laws and regulations we are subject to.
- To ensure all employment is freely chosen, working conditions are safe & hygienic, child labour is not used, wages are fair and benchmarked, working hours are not excessive, no harsh, cruel or degrading practices exist and no bribery corruption, blackmailing or bullying is permitted.

This policy will be reviewed annually and communicated both internally and externally as required.

Modern Slavery Statement

We are committed to improving and maintaining high standards to combat modern slavery and wish to affirm this commitment through this statement. We acknowledge our commitment to our stakeholders to ensure we carry out our business in a reputable manner. Modern Slavery is a violation of an individual's fundamental human rights through exploitation of workers for commercial gain.

DGD Shredding are leaders in the provision Secure Destruction Services and do so not only in being the most compliant, secure and competitive service but also in ensuring the highest standards are upheld universally throughout its operations. Our people are fundamental to our success, and we ensure they benefit fairly from their contributions.

We are committed to not only ensuring no form of modern slavery occurs directly in our business but also in our supply chain or any business connected to our operation. We have a zero-tolerance approach to working with such organisations. Together with our Ethical Trade Policy we wish to do our part in promoting high standards in our supply chain.

We will regularly review our operations to ensure this statement is adhered to and updated where appropriate.

Data Protection GDPR Policy and Code of Practice

DGD Papers Limited T/A DGD Shredding (DGD) operates in a sensitive industry that involves Secure Shredding of Confidential Documents, media devices, magnetic media and other items designated confidential by the employer or its customers. DGD provides it's services on the basis of being employed as a 'Data Processor' on behalf of 'Data Controllers' as defined by the General Data Protection Regulation (GDPR).

Acting as a 'Data Processor' DGD shall:

- 1. Comply with it's obligations under Data Protection Legislation in respect of personal data processed by the company in connection with the services it provides;
- 2. Only process personal data to the extent that it is necessary to provide services to the 'data controller';
- 3. Implement and maintain appropriate technical and organisational measures to maintain the security of such Personal Data and prevent unauthorised or unlawful access to, or processing of, or any accidental loss, destruction or damage to that Personal Data. Material provided by the client to DGD and subsequently destroyed in error will not be considered to unauthorised or unlawful destruction or damage to Personal Data.
- 4. Ensure that all employees keep the Personal Data confidential.
- 5. Will maintain a record of all processing activities and will provide all cooperation and information to 'the Client' as is reasonably necessary for 'the Client' to demonstrate compliance with its obligations pursuant to Data Protection Legislation, including facilitating audits conducted by or on behalf of 'the Client' or its regulators on reasonable notice from time to time.
- 6. Notify 'the Client' in writing undue delay and in event within 24 hours of discovery of, and provide full cooperation in the event of, any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data in DGD's possession or control.
- 7. Not engage in subcontracting of 'data processing' activities on behalf of 'the Client' without prior authorisation from 'the Client' in writing.
- 8. Stop all processing activities immediately and will return any unprocessed material to 'the client' or their agents where 'the Client' requests in writing to do so.

As DGD is a data destruction service provider all materials provided to DGD by the client will be considered the responsibility of the client to determine whether the destruction is authorised and lawful. DGD will not be responsible for unlawful or unauthorised destruction of 'Personal Data' where a 'Data Controller' has designated the 'Personal Data' for destruction and is subsequently found to be unlawful or unauthorised.

This Data Protection (GDPR) Policy & Code of Practice will be implemented throughout DGD Papers Limited T/A DGD Shredding and the Company and its employees will work at all times to protect 'personal data' in its possession. The Company will work continually towards compliance with the GDPR.

Environmental Policy

DGD Shredding is resolute in its commitment to reduce the impact its operations have on the environment. Through the implementation of an ISO 14001 Environmental Management System the company aims at all times to account for the environment in both its decision making and operational activities.

With annual independent audits by NQA, DGD Shredding proves adherence to its Environmental Management System and its commitment to a path of continual improvement. DGD Shredding's Environmental aims are:

- To use the most energy efficient equipment possible to reduce the company's environmental impact.
- To monitor and review regularly the Company's energy usage and make reductions where possible.
- To adhere to the waste hierarchy of Reduce, Reuse and Recycle where possible and only ever use landfill or incineration as a last resort.
- To account for environmental factors when sourcing equipment and suppliers.
- To monitor and report the company's environmental impacts as required.
- To operate dynamically to account for environmental concerns.
- To ensure all legal requirements are accounted for.

Sustainability Policy

DGD Shredding is committed to minimising any potential impact our activities may have on the environment and the surrounding community by approaching our business matters responsibly. We will strive to promote sustainability and follow sustainable business practices in our day to day operations. Our Sustainability Policy is based on the following principles:

- Complying fully with all relevant legal requirements, codes of practice and regulations.
- Assessing the environmental impacts of our operations, continuously seeking to reduce these
 impacts and improving our resource efficiency through reduction of energy consumption,
 water use and waste.
- Promoting environmental and energy awareness in our employees through participation and training.
- Monitoring our progress to ensure on-going improvements in our environmental performance.
- Making clients and suppliers aware of our sustainability policy, and encouraging them to adopt sound sustainable management practices.

We are committed to:

Energy

- Reducing our energy usage and associated carbon footprint as part of our overall carbon management strategy.
- Optimising energy efficiency and conservation in all operations.
- Controlling and managing energy efficiency in our business and promoting energy efficiency overall
- Reducing the carbon impact of transportation in relation to our business activities.

Waste

- Actively promoting reduce, reuse and recycle principles both internally and amongst our suppliers and clients.
- Minimising waste generation by applying reduce, reuse and recycle options where possible.
- Minimising waste generation and unnecessary resource usage during the stages of planning, design and operation of new and existing business activities.

Continuous Improvement

- Setting specific improvement goals, monitoring progress and communicating results internally.
- Developing specific objectives to continually improve our environmental performance.
- Setting objectives and targets for continuous improvement. Measure and review our performance regularly and communicate our results internally.
- Continual performance improvement in minimising environmental impacts of our business.

Procurement

- Choosing suppliers and contractors that adopt best environmental practices, and make this the
 procurement policy of our company.
- Purchasing products and services that have the least possible environmental impact.
- Encouraging suppliers and contractors to implement sustainable environmental systems.
- Minimising the use of hazardous chemicals and solvents and instructing our agents to do the same
- Using materials, fittings and furnishings from sustainable sources.

Awareness / Training

- Encouraging environmental awareness among our employees through appropriate communication and training programmes.
- Promoting environmental awareness throughout our business.
- Ensuring that all employees understand our environmental policy and conform to its standards.
- Continuous training of all staff in environment related issues.

In order to put these principles into practice we resolve to:

- Where possible walk, cycle or use public transport to travel to our offices, attend meetings, site visits etc. particularly when attending multiple sites close together or working from alternative office locations.
- Avoid physically travelling to meetings, site visits etc. where alternatives are available and practical, such as using teleconferencing and web cams.
- Ensure efficient timing of meetings and site visits to avoid multiple trips.
- Share a car where more than one employee is attending a meeting or site visit in the same place unless there is a valid reason not to.
- Reduce the need for staff to travel by supporting agile working, including working from home and alternative office locations, in line with our Agile Working Policy.
- Minimise our use of paper and other office consumables, for example by double-siding all
 printing where appropriate and identifying opportunities to reduce waste.
- As far as possible arrange for the re-use or recycling of office equipment by purchasing energy efficient equipment and promoting good housekeeping practices.
- Purchase electricity from a supplier committed to renewable energy, in conjunction with our solar PV.
- Actively research and implement renewable energy solutions for our business.
- Ensure that timber furniture, and any other timber products, are recycled or from well-managed, sustainable sources and are Forest Stewardship Council (FSC) certified.
- Purchase fair-trade and/or organic food and beverage.
- Eliminate our consumption of single-use plastic products, by seeking out sustainable suppliers and refilling items such as toner cartridges and hand-soap dispensers.
- Reduce our reliance on paper and reduce office printing. Work with our IT advisors to find less paper intensive file management strategies, and implement to reduce overall paper and printing.
- Take action by advising other businesses on how they can improve their sustainability.
- Keep energy usage low; ensure that all lights and electrical items are switched off when not in use, or on motion sensors.
- Recycle as much waste as possible.
- Recycling equipment that is no longer of use to the company, and where possible look to circular economy uses; for example, giving away electronic items / furniture etc. that we no longer use to not for profit organisations.
- Purchase products made with recycled paper, i.e. toilet paper, paper towels, printer paper and tissues.
- Purchase products with a lower environmental impact, i.e. environmentally friendly cleaning products, soaps and detergents.

This policy is set by the Directors of DGD Shredding, with the aim of addressing, to the best of our ability, the complex challenges presented by climate change.

Smoke Free Workplace Policy

Introduction

Tobacco use is the leading cause of preventable death in Ireland with almost 6000 smokers dying each year from tobacco related diseases. DGD Shredding's goal is to protect staff from the risks of smoking whilst they're at work. It is the policy of DGD that all of the site is smoke-free and that all employees have a right to work in a smoke-free environment.

Purpose

To protect the health wellbeing of our staff and to ensure compliance with the Public Health (Tobacco) Acts, 2002 and 2004 prohibit smoking in indoor places of work. To reduce the risk of fire, and sources of ignition around the site.

Scope

This policy applies to all employees, consultants, contractors and visitors.

Procedures

Smoking is prohibited in all areas of the DGD Site, including all entrances and doorways of all premises, so that employees are not exposed to passive smoke whilst accessing or leaving these premises. A Company vehicle is a 'place of work' as specified in the Safety, Health and Welfare at Work Act 2005; hence smoking is prohibited in all vehicles which are used on DGD business.

Legislation

The Public Health (Tobacco) Acts, 2002 and 2004 prohibit smoking in indoor places of work. Section 47 of the Acts, which came into force on 29 March 2004, is designed to protect third parties, such as workers, from the ill-effects of exposure to secondhand smoke. A person guilty of an offence under Section 5 (2A) of the Acts, a person found guilty of an offence under Section 47 is liable on summary conviction to a fine of up to €3,000.

Definitions

DGD's Smoke Free Workplace Policy extends to the use of E-cigarettes, Vaporisers and Herbal Cigarettes/Tobacco and any derivatives of these. "Workplace" related to all premises/vehicles/facilities where DGD business is conducted.

Responsibilities

Responsibility for the implementation of this policy rests with the manager in charge of the workplace. All employees have an obligation to adhere to, and facilitate the implementation of this policy. Infringements by staff will be dealt with under DGD's disciplinary procedures. Please note that anyone who contravenes the law prohibiting smoking in the workplace i.e. customers, visitors and employees, are liable to prosecution.

Support

Smoking seriously harms you and others around you. If you don't smoke, don't start. If you do, please stop. Information on how to obtain support in stopping smoking is available from the National Smokers' Quitline on 1850 201 203, www.quit.ie

References

- 1. Safety, Health And Welfare At Work Act 2005
- 2. Quit.ie. (2018). Help information and advice on how to quit smoking from the HSE Quit.ie. [online] Available at: https://www2.hse.ie/quit-smoking/ [Accessed 23rd Aug 2022].

Fire Safety Policy

Fire is a hazard that could affect all parts of our premises. The consequences of fire include the threat to the life or health and safety of people, damage to or loss of property and severe interruption to normal business activities and opportunities.

Our fire safety measures include preventing outbreaks of fire and mitigating the direct and consequential damage by early detection, reducing the risk of fire spread by structural containment, providing escape routes, emergency evacuation procedures and means for fire-fighting and detection. This policy expands on our general health and safety and environmental policies. Its primary objective is the creation of a fire safety management system, which together with the structure and maintenance of our buildings seek to protect human life as well as the assets and business opportunities of this organisation. The policy applies to all our buildings including any occupied under a tenancy agreement. Its requirements extend to everyone on the premises, legitimately or otherwise. In jointly occupied premises our objective is to co-operate and coordinate action with other occupiers.

The aim of this policy is to achieve a 'fire safe' environment for all workers and building occupants, which will reduce to a minimum the risks to life, to property, to business loss and of personal injury. To achieve this we will provide the time and resources necessary to formulate a fire safety strategy for our premises. We will ensure that we inform, instruct and train all the relevant people.

Achievement of these objectives will demonstrate compliance with fire safety legislation and current good practice.

Michael Garvey has been appointed as the 'Responsible Person' for fire safety in this business.

Gym Usage Policy

Introduction

This policy is designed to promote, protect, and regulate the use of the gym and its facilities.

Gym Equipment

The gym consists of the following equipment: (Note: Exact equipment may vary)

Ares Multi Gym

Olympics Bar & Bumper Plates

Dumbbell Set

Exercise Bike

Cross-Trainer

Treadmill

Power Bands

Who can use the Gym?

The gym is available solely for use by DGD Shredding Staff and connected persons (subject to management approval). Any individual who uses the gym does so voluntarily and at the individuals' own risk. DGD Shredding will not be liable for any injury sustained by any person as a result of using the gym equipment. No member of Staff is permitted to use the gym unless they have attended a safety induction and the instructor has verified that you may use the equipment.

Induction for new users

New users of the gym must receive an induction session from a qualified instructor. Applications for induction are managed by the Operations Manager. Please apply through the Operations Office. Depending on the time of year and the number of pending applications a waiting list of persons requesting an induction is managed by the Operations Manager. He will notify you of dates for inductions by text.

Before using the Gym Facility

- DGD Shredding advises that before participating in an exercise programme all users should have a thorough physical examination from a medical practitioner.
- Any person with a history of heart disease, hypertension, diabetes or any degenerative joint or muscular disease should first obtain permission from their doctor.
- Do not eat a large meal or drink alcohol for at least 2 hours before exercise.
- · Seek medical advice before using the equipment if you have a medical problem.
- Always ensure that your clothing and footwear are suitable and properly fitting.
- Avoid training alone. Try to ensure there is someone else present.
- Always warm up prior to exercise and cool down afterwards.
- Always warm up and stretch before exercise particularly before weight training. Gentle cardio work with a bike and stretching is excellent before starting on a weight training session or heavy lifting.

Use of the Gym

The gym is provided for the enjoyment of all who use it, irrespective of whether it is recreational for keeping fit, part of rehabilitation from an injury programme, or as part of a training programme for an individual sport. The gym is available for use at any time of the day. Only users of the gym who have had an induction session will be permitted to use the gym. Use of any gym equipment outside the gym is prohibited.

Gym Etiquette

The attached notice has been agreed by DGD Shredding Management and is displayed in the Gym.

Gym Safety

There is a risk of injury when using (or misusing) weight training equipment. The following points should be observed:

- Inspect equipment before each use for loose, worn or frayed parts.
- Check that wire ropes are not frayed or kinked and that pulleys rotate freely.
- · Report any problems with the equipment to the Operations or Facilities Manager.
- Inform other gym users by placing one of the 'Out of order' signs provided on any equipment that is out of action.
- Space in the gym is limited. To avoid trip hazards, do not leave any personal belongings on the floor. Please use the coat hooks provided.
- Always lift and lower weights under control. Serious injury could result from lack of control, balance and form. Do not drop weights on the floor.
- Work with weights you can manage/handle.
- Do not continue training if you feel dizzy or unwell. Remember to breathe properly during exercise particularly when lifting weights.
- · Do not tolerate horse-play around machinery and equipment.

Quality Policy

DGD Papers Limited T/A DGD Shredding is a secure destruction specialist. Its core activities are confidential shredding and recycling carried out at the company's destruction centre in Raheen Business Park Limerick. The organization recognizes it's responsibilities to its staff, shareholders, customers and the general public and is committed to the continual improvement of the operating environment of its facilities. To this end it will maintain a documented Environmental & Quality Management System which conforms to: ISO 14001:2015 and ISO 9001:2015 and will take into account all regulatory and legislative requirements pertinent to its sector, local operating environment and customer requirements.

The organisation's objectives include the following:

- Communicating its policies both internally and externally (customers, contractors and main suppliers) as appropriate
- Commitment to continual improvement in environmental & business performance and improvement of the quality management system
- Using the input of staff, customers, shareholders, government, local authorities, interested third parties and the general public
- Awareness and training on environmental & quality issues
- Creating a better environment for all, through the reduction, recycling and reuse of
 waste, the optimum usage of resources and the elimination of polluting releases to the
 environment
- Compliance with all pertinent applicable regulations, legislation and licences
- · Prevention of pollution
- Processing of 'product' in a safe and confidential environment to customer specifications and requirements
- Customer satisfaction

The above policy is supported by the management and directors of DGD Papers Ltd T/A DGD Shredding who shall commit the necessary resources in ensuring that the objectives and targets can be

achieved. Appropriate programmes are set up to achieve our objectives and will be reviewed at the management review.

Data Protection GDPR Policy and Code of Practice

DGD Papers Limited T/A DGD Shredding (DGD) operates in a sensitive industry that involves Secure Shredding of Confidential Documents, media devices, magnetic media and other items designated confidential by the employer or its customers. DGD provides it's services on the basis of being employed as a 'Data Processor' on behalf of 'Data Controllers' as defined by the General Data Protection Regulation (GDPR).

Acting as a 'Data Processor' DGD shall:

- 1. Comply with it's obligations under Data Protection Legislation in respect of personal data processed by the company in connection with the services it provides;
- 2. Only process personal data to the extent that it is necessary to provide services to the 'data controller';
- 3. Implement and maintain appropriate technical and organisational measures to maintain the security of such Personal Data and prevent unauthorised or unlawful access to, or processing of, or any accidental loss, destruction or damage to that Personal Data. Material provided by the client to DGD and subsequently destroyed in error will not be considered to unauthorised or unlawful destruction or damage to Personal Data.
- 4. Ensure that all employees keep the Personal Data confidential.
- 5. Will maintain a record of all processing activities and will provide all cooperation and information to 'the Client' as is reasonably necessary for 'the Client' to demonstrate compliance with its obligations pursuant to Data Protection Legislation, including facilitating audits conducted by or on behalf of 'the Client' or its regulators on reasonable notice from time to time.
- 6. Notify 'the Client' in writing undue delay and in event within 24 hours of discovery of, and provide full cooperation in the event of, any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data in DGD's possession or control.
- 7. Not engage in subcontracting of 'data processing' activities on behalf of 'the Client' without prior authorisation from 'the Client' in writing.
- 8. Stop all processing activities immediately and will return any unprocessed material to 'the client' or their agents where 'the Client' requests in writing to do so.
- As DGD is a data destruction service provider all materials provided to DGD by the client will be considered the responsibility of the client to determine whether the destruction is authorised and lawful. DGD will not be responsible for unlawful or unauthorised destruction of 'Personal Data' where a 'Data Controller' has designated the 'Personal Data' for destruction and is subsequently found to be unlawful or unauthorised.

This Data Protection (GDPR) Policy & Code of Practice will be implemented throughout DGD Papers Limited T/A DGD Shredding and the Company and its employees will work at all times to protect 'personal data' in its possession. The Company will work continually towards compliance with the GDPR.