

HSE POLICY



Health, Safety and Environment (HSE) Arrangements – Issue 2, Oct 2021

Our Company Values

- Be ambitious – the world depends on us
- Respect and value all stakeholders
- Be committed to safety, quality and sustainability

No matter how ambitious we are, safety is of the utmost importance in everything we do. We all share responsibility for protecting people, property and the environment at all times.



Introduction

Accsys is committed to ensuring that Health, Safety and Environmental (HSE) issues are prioritised in all that we do.

Our HSE vision is that we will strive for:

- Zero harm
- Zero major incidents
- Zero environmental incidents
- Continuous improvements
- ...and Economic and environmental sustainability in everything we do.

HSE Arrangements

Below we set out the arrangements that will enable us to fulfil our vision and to become leaders in HSE. We will continuously review the Management of HSE within our operations to ensure we fulfil and comply with these HSE arrangements.

Note: The HSE arrangements set out below are applicable to all people working at Accsys Technologies PLC and its subsidiaries (Accsys), and at all its sites.

1. Policy Statement

Accsys has a HSE Policy Statement, this statement details our passion for HSE and contains our vision, our principles and our HSE commitments.

The HSE Policy Statement is approved by our Board of Directors (BOD), the Executive Committee (EXCO) and approved/signed by our Chief Executive.

The Policy Statement will be available to our staff and other stakeholders and will be displayed on Accsys's website. It will be formally reviewed annually and updated as necessary.

2. HSE Responsibility

It is important that we recognise that HSE Management is everyone's responsibility, people must take account of their own responsibility and to also look out for each other. Accsys will ensure that we support you by providing a safe plant and equipment, safe processes and procedures, appropriate training and specialist HSE support.

3. Accsys PLC HSE Committee

Accsys PLC has established a HSE Committee. The Committee shall be responsible on behalf of the Company Board of the Directors for the reviewing and updating the Policy, the creation of a Group HSE Risk Matrix, reviewing HSE performance against targets, reviewing the outcome of any significant accidents and major incidents, regularly reviewing the Company's Emergency Response and Incident Management planning, monitoring the effectiveness of the HSE work programmes and ensuring the suitability of risk control measures. The committee will ensure programmes are in place to confirm legal compliance. Terms of References are available for the HSE Committee.

4. HSE Resources

Accsys has a team of qualified HSE professionals. The team includes full-time inhouse HSE Managers and various external HSE professionals. Where we require additional resource, specialist HSE expertise or require independence to our process we will often contract in 3rd party specialists to assist.

In addition to having our HSE professionals, all employees will be trained in HSE and will receive regular HSE awareness training to enable them to contribute to our HSE programmes and support the HSE vision.

5. HSE Strategy

Accsys has a Global HSE Strategy which outlines the key activities for the forthcoming years. The Strategy has been communicated to all staff via a recorded briefing so that it can be reviewed by new starters joining the organisation.

The Strategy will be reviewed annually and will be updated where necessary. An update against the key actions within the strategy is completed at the EXCO Quarterly Performance Review (QPR) meeting.

The HSE Strategy is made up of 4 key sections, there are several key actions and activities within each of the sections shown opposite.

| Strategy | | | |
|--|---|--|---|
| Management & Leadership Setting Expectations, Minimum Std & Leadership Activities / Behaviours | Programs & Systems Setting Policies, Guidance, Performance Measures & Standards | Employees & Behaviours Regular HSE Communications, training, HSE awareness processes & SUSA Auditing | Physical Improvements Creating Safe Environment, Standardising equipment where possible, sharing best practices |
| Be committed to safety, quality and sustainability | | | |

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6. HSE Risk Management / Risk Matrix

Accsys assesses and evaluates its key (high level) risks on an ongoing basis and formally reviews these at quarterly EXCO Risk Committee meetings. Note: Risk matrices are also available within each of the operations.

The Risk Committee meetings will ensure that all key 'material' risks have been included, ensure that the correct risk evaluation score has been applied and also that the appropriate remediation plan and resources have been assigned to each of the key risks.

The Risk Matrix containing the significant risks is shared and discussed with the BOD on a regular basis.

7. Key risks: Chemical risk management

Various chemicals are used in the production of Accoya and Tricoya products. The two main chemicals are Acetic Anhydride and Acetic Acid.

There are several other chemicals that are used in our operations, laboratory, and engineering functions. We also produce wood dust from our processes and use water-based dyes to create our Accoya Color wood products.

All chemicals used (including wood dust that is generated) at Accsys are assessed to determine the chemical hazards, risks to health and identify the controls that need to be implemented. Any new chemicals will be risk assessed before use.

When handling chemicals, we will also consider risks for any third-party contractors such as tanker drivers and wood chip handlers who may be loading or unloading materials from our sites.

8. Key risks: Vehicle & Pedestrian Safety

To help minimise the manual movement of heavy loads Accsys sites operate a fleet of lift trucks. Lift trucks are fitted with various safety features; however, they remain high risk items of equipment and people working near to lift trucks shall take extra care of their own safety and the safety of others.

Employees (or contractors) must not drive lift trucks (or any other vehicles) without formal training, appropriate refresher training and the company authority to drive the vehicle.

For the safety of pedestrians on site, it is important that everyone uses pedestrian walkways, designated crossing points and pedestrian access doors where available.

Pedestrians must always make themselves visible to lift truck drivers when entering any areas where lift trucks are operating and give way/priority to lift trucks; importantly you may easily be able to see a lift truck, however the driver of the vehicle may not have seen you.

A company car/driver handbook is available for company car drivers and those who occasionally need to drive for company business. The key points covered by the handbook include safe journey planning, avoiding the use of mobile phones whilst driving, taking regular breaks to help avoid tiredness (and make important phone calls) and managing emergency situations.

9. Key risks: Remote & Field Workers

Many Accsys employees are required to visit customers, suppliers or other business colleagues as part of their normal work activities; travelling is a key risk in their daily work activities. Safety awareness training and the provision of personal protective equipment have been provided to staff to help keep them safe in what is often an unfamiliar work environment.

10. Key risks: Visitor and Contractor Safety

As we grow our business over the next few years Accsys will have many visitors and contractors on site. To manage these risks, we have in place visitor and contractor procedures. All visitors and contractors must undergo induction training. The level of induction training required will depend upon the activity being undertaken by the visitor/contractor. Risk assessments, method statements and permits will be required for contractor works.

11. Key risks: Fire & Evacuation

It is important that whenever you visit a premises you familiarise yourself with the fire procedures and evacuation protocols. These will be displayed. Ensure you are aware of your nearest fire exit.

All Accsys operations have functional fire alarm systems, you should be familiar with how to activate the system and raise the alarm. It is also vital that you understand how to contact the emergency services and know the address of the site to relay this information to the emergency services.

Accsys sites will have emergency response procedures and will hold evacuation drills to help test the systems and help train staff in evacuation response.

If you have an impairment or disability and require assistance in the event of an evacuation, please inform the Human Resources team.

General fire rules - if you discover a fire:

- Do not attempt to tackle the fire
- Activate the fire alarm via your nearest fire call point
- Evacuate the building via the nearest fire exit, do not divert or stop to collect personal possessions
- Remain calm, evacuate quickly, but do not run. Do not use lifts.
- Call the emergency services
- Assemble at the fire assembly point
- Do not re-enter the building until you are given the 'all clear'

Please note that local site fire rules may differ slightly to those described above.

12. Insurance Risk Management

Like all organisations Accsys holds a range of insurance policies to reflect our business risks, these policies are designed to help minimise business losses should a major incident occur. Accsys works closely with insurers and insurance brokers to help manage and minimise key risks.

Each year Accsys provides a HSE update to our Insurance Brokers, outlining our HSE activities, achievements, and performance. This report will help the insurers to understand our business, our HSE risks and determine how we are managing key business risks.

13. Emergency Risk Management & Response

Accsys and its operations have various emergency plans in place to minimise the impact from an emergency or major event. A group level Incident Management and Escalation Plan is in place which is supported by local site level Emergency Response Plans.

The group level plan ensures that more serious incidents are escalated to EXCO as soon as possible. This helps to ensure that sufficient support is provided to the site and will also help ensure that key stakeholders are informed of incidents without delay.

Training in Emergency/Incident Management is performed.

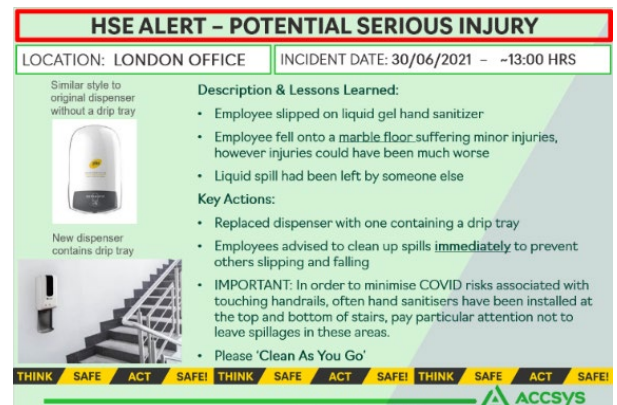
14. Accidents & Incidents

It is our policy and expectation that all accidents, incidents, and near-miss events must be reported as soon as possible (irrespective of how minor the incident may seem). We have appointed first aid staff and first aid provisions in all Accsys business locations to help deal with accidents and treat injured personnel.

Accidents and incidents will be investigated. The depth of investigation will be determined by the potential or actual severity of the incident. More serious incident investigations will be supported by the HSE Director.

Accsys has a HSE Alert process. The HSE alerts are used to communicate accidents, incidents and near-misses where sharing the incident is believed will help prevent a re-occurrence or will raise awareness to a particular situation.

All HSE alerts are shared directly to every member of staff in native languages. Stand-down events will be conducted for serious incidents. A standard template is used to create the alert. An example HSE Alert is shown.



HSE ALERT – POTENTIAL SERIOUS INJURY

LOCATION: LONDON OFFICE | INCIDENT DATE: 30/06/2021 – -13:00 HRS

Similar style to original dispenser without a drip tray

New dispenser contains drip tray

Description & Lessons Learned:

- Employee slipped on liquid gel hand sanitizer
- Employee fell onto a marble floor suffering minor injuries, however injuries could have been much worse
- Liquid spill had been left by someone else

Key Actions:

- Replaced dispenser with one containing a drip tray
- Employees advised to clean up spills **immediately** to prevent others slipping and falling
- IMPORTANT:** In order to minimise COVID risks associated with touching handrails, often hand sanitisers have been installed at the top and bottom of stairs, pay particular attention not to leave spillages in these areas.
- Please 'Clean As You Go'

THINK SAFE ACT SAFE! THINK SAFE ACT SAFE! THINK SAFE ACT SAFE!

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15. HSE Branding & Messaging

To ensure we communicate our HSE messaging effectively across our operations we thought it was important to create a HSE slogan and identity. Following a successful slogan competition, the slogan 'Think Safe, Act Safe!' was selected to help represent our HSE values and identity. The black and yellow colour combination and strap line is now used across a variety of HSE literature.



16. Communications

To ensure that HSE matters are at the forefront of people's minds, we communicate regularly with our teams, both at a group and local operational level.

Group level communications include a monthly HSE update and toolbox briefings. Written communications include a Monthly HSE Dashboard slide and the distribution of routine HSE alerts from accidents, incidents and near-miss events. These are distributed directly to every Accsys employee.

17. Training

HSE training forms part of the training requirements for everyone that works for Accsys. The level of training they receive will depend upon their position within the company, the tasks being undertaken by the individuals and the level of risk which they may be exposed.

Specific specialised and statutory training will be provided where required, for equipment such as overhead cranes, use of lift trucks, first aid, confined space entry, etc

Accsys has a dedicated Learning & Development professional who is jointly responsible (with functional leaders) for assessing the training needs of the organisation and developing training plans.

18. HSE Key Performance Indicators (KPI)

To help measure the HSE performance of our operations we collect and collate various HSE data. This data includes a combination of both proactive and reactive measures (also known as leading and lagging indicators). The data we collect enables Accsys to determine our performance, compare ourselves against prior years and also to compare our HSE performance against other leading organisations. Our measurement of safety performance includes lost time incident rates, severity rates and total incidence rates.

We collect monthly data on proactive (leading safety indicators) which includes Safety Observation Cards (SOC's), Senior Leadership Tours (site safety visits) and the number of training sessions attended by site personnel.

19. Plant & Equipment Safety Assessments

To ensure that our plant and equipment is safe to operate we perform various types of safety assessments. These may be a general risk assessment or may include specialist process safety assessments such as: HAZOP's, HAZID, LOPA, SIL, ATEX, etc. The specialist assessments are designed to assess particular risks associated with an item of equipment or with a given task and therefore the type of assessment must be selected for its relevance. Specially trained professionals are required to perform each type of process safety assessment.

People must use the equipment in accordance with the operating instructions. Never operate equipment without having received the necessary training. Any equipment faults, damage or equipment concerns should be immediately reported to your Line Manager.

Equipment repairs must be carried out by trained staff. Do not attempt to carry out any repairs unless you are authorised and qualified to do so.

20. HSE processes and procedures

Each operational site is responsible for maintaining the appropriate HSE documentation pertaining to their specific operations and activities, the local HSE Manager has ultimate responsibility for maintaining these documents and ensuring these are available for staff within shared network folders and/or paper copies.

Line Managers are responsible for ensuring that their staff have been appropriately trained, however everyone has a responsibility for locating the procedures and reviewing them on a regular basis.

Accsys has various documented practices and procedures to ensure equipment is safe for use and is also operated safely. Risk assessments will be used to help determine the content of the procedures and the risk controls that are required.

Documented safe operating procedures are available for all items of plant equipment and training in these procedures is given to our staff.

21. General Safe Behaviours

THINK SAFE ACT SAFE!

There is a level of general safe behaviour expected by all employees, visitors and contractors working on an Accsys site. It is a legal requirement for all staff to co-operate with its employer on HSE matters and comply with the necessary safety instructions, failure to do this may result in disciplinary action.

All people who work on an Accsys site are required to co-operate in the investigation of any accident, incident or serious near-miss that led to, or likely to have led to a workplace injury.

All people will be expected to follow the site rules, in particular:

- Follow designated walkways
- Hold handrails on stairs
- Only smoke in designated areas
- Only use mobile phones in designated areas, never walk and talk
- Always work safely
- Challenge any unsafe behaviours
- Report and where possible rectify unsafe conditions
- Always wear the appropriate personal protective equipment
- Never misuse or interfere with safety equipment
- Use the Safety Observation Card system to report HSE matters
- Never perform any task which you are not authorised or trained to do

22. Environmental, Social & Governance (ESG)

Accsys have people in place to manage the various aspects of ESG.

Our ESG professional has created a strategy relating to ESG matters and a comprehensive annual ESG report is produced.

The ESG report includes numerous HSE performance data (including energy and resource use) along with social and governance information. Digital copies of the ESG report are available on the Accsys website.

Robert Harris,
Chief Executive Officer