



# Health, Safety and Wellbeing Policy

## November 2025



## 1. Abbreviations and Definitions

Occupational Health and Safety Management System (OHSMS)	The system used to manage OHS risks and opportunities, aligning with ISO 45001:2018.
ISO 45001	The international standard for Occupational Health & Safety Management Systems.
Integrated Management System (IMS)	Apogee's unified management framework encompassing Quality (ISO 9001), Environmental (ISO 14001), Energy (ISO 50001), Occupational Health & Safety (ISO 45001), and Information Security (ISO 27001, ISO/IEC 27001:2022).
Executive Leadership Team (ELT)	Top management responsible for strategic direction and resource allocation.
Environmental, Social, and Governance (ESG)	A framework used by Apogee to assess and manage its performance across environmental sustainability, social responsibility, and corporate governance.
Quality, Health, Safety and Environment. (QHSE)	The collective management domain encompassing the ISO 9001, ISO 45001, and ISO 14001 standards within the IMS.
Interested Parties	Persons or organisations that can affect, be affected by, or perceive themselves to be affected by a decision or activity related to Apogee's OHS performance.
Continual Improvement	A recurring activity to enhance performance, focusing on increasing the ability to meet requirements.
Health and Safety Executive (HSE)	The United Kingdom's national regulatory body for workplace health and safety.
Safe System of Work (SSoW)	A formal procedure that identifies hazards, assesses risks, and details the safe method by which a specific task must be carried out.
Personal Protective Equipment. (PPE)	Equipment worn to minimise exposure to hazards that cause serious workplace injuries and illnesses (e.g., safety footwear, gloves, high-visibility vests).
Employee Assistance Programme (EAP)	A confidential, short-term counselling service and advisory program offered to employees to help with personal and/or work-related problems that might impact their job performance, health, and well-being.
Job Safety Analysis (JSA)	A technique that breaks down a job into steps, identifies hazards, and recommends preventative controls for each step.
Control of Substances Hazardous to Health (COSHH)	The UK regulations requiring employers to control substances that are hazardous to health.

## 2. Introduction

### 2.1. Purpose and Scope

Apogee Corporation Limited is committed to protecting the health, safety, and wellbeing of all employees, contractors, agency staff, visitors, and others who may be affected by its activities, including the prevention of work-related injury and ill-health.

This policy establishes the foundational framework for our Occupational Health and Safety Management System (OHSMS), explicitly aligning with ISO 45001:2018 requirements and all relevant statutory and regulatory requirements across all jurisdictions in which we operate (Great Britain (England, Scotland, Wales), Northern Ireland (NI), Republic of Ireland (ROI), Jersey, Germany, and Isle of Man).

We are proud to maintain external accreditations including SafeContractor and The Contractors Health and Safety Assessment Scheme (CHAS), which demonstrate our pre-qualification to manage health and safety risks effectively.

The objective is to ensure all work is undertaken safely, without risk to health, and in an environment that supports both physical and mental wellbeing.

The scope of this OHSMS Policy applies to Apogee Group operations for:

- The Provision of managed print services, managed IT services, Office Print Services, Technical Services and Document Management Solutions, including the provision and installation of Hardware (printers and computers), Software, Consumables and outsourced services.
- This Group policy is applicable across all relevant functions, processes, and activities, encompassing all operational locations, vehicles, and off-site operations in Great Britain (England, Scotland, Wales), Northern Ireland (NI), Republic of Ireland (ROI), Jersey, Germany, and Isle of Man).

Apogee Corporation Limited is committed to protecting the health, safety and wellbeing of all employees, contractors, agency staff, visitors and other who may be affected by its activities. This policy establishes the framework for managing health, safety and wellbeing in compliance with:

- The Health and Safety at Work etc Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Associated statutory instruments, HSE Approved Codes of Practice and industry standards
- ISO 45001:2018 Occupational Health & Safety Management System requirements

It applied to all Apogee locations, vehicles and off-site operations in the UK and any overseas branched operating under Apogee's control.

The objective is to ensure all work is undertaken safely, without risk to health and in an environment that supports both physical and mental wellbeing.

## 2.2. Guiding principles

Apogee's unwavering commitment to occupational health, safety, and wellbeing is guided by the following principles:

- **Leadership and Commitment:** Demonstrating top management accountability, providing a clear policy direction, and ensuring adequate resources are allocated.

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- **Worker Participation:** Consulting and involving employees in all levels of the OHSMS, ensuring open communication and fostering a culture of ownership over safety.
- **Process Approach:** Managing activities and resources as a set of interconnected processes to achieve consistent and predictable results efficiently, utilizing the structures of the IMS.
- **Continual Improvement:** Committing to the ongoing enhancement of our OHSMS and overall performance through regular audits, reviews, and proactive initiatives.
- **Risk Control:** Systematically identifying, assessing, and mitigating risks to health and safety across all operations to eliminate hazards and minimise OH&S risks.

### 3. Roles and Responsibilities

Roles	Responsibilities
<b>ESG Group</b> (Chaired by the Chief People Officer)	<ul style="list-style-type: none"> <li>● <b>Policy Ownership:</b> Acts as the ultimate owner of this policy, providing strategic direction and ensuring OHS management aligns with Apogee's broader ESG strategy and objectives.</li> <li>● <b>Strategic Oversight:</b> Sets the overall H&amp;S strategy and ensures adequate resources for OHSMS effectiveness.</li> </ul>
<b>Executive Leadership Team (ELT)</b>	<ul style="list-style-type: none"> <li>● <b>Accountability and Leadership:</b> Provides a safe working environment and fosters a positive health and safety culture.</li> <li>● <b>Policy Approval:</b> Reviews and formally approves this Health, Safety &amp; Wellbeing Policy.</li> <li>● <b>Resource Provision:</b> Allocates sufficient financial, human, and technical resource</li> </ul>
<b>Chief Executive Officer (CEO)</b>	<ul style="list-style-type: none"> <li>● <b>Accountability and Leadership:</b> Demonstrates visible leadership commitment and accountability for the overall performance of the OHSMS.</li> <li>● <b>Compliance:</b> Ensures compliance with statutory duties and regulatory requirements across all operating markets.</li> </ul>
<b>QHSE Manager (Competent Person)</b>	<ul style="list-style-type: none"> <li>● <b>OHSMS Implementation Lead:</b> Overall responsibility for the establishment, implementation, maintenance, and continual improvement of the OHSMS in accordance with ISO 45001:2018.</li> <li>● <b>Performance Monitoring:</b> Monitors OHSMS performance, tracks progress against objectives and KPIs, and reports findings to the ESG Group and ELT.</li> </ul>
<b>Department Managers &amp; Senior Managers</b>	<ul style="list-style-type: none"> <li>● <b>Risk Management:</b> Ensure risk assessments, COSHH Assessments, and safe systems of work are in place and communicated.</li> <li>● <b>Incident Management:</b> Lead investigations into incidents and ensure corrective actions are implemented.</li> </ul>
<b>Line Managers &amp; Supervisors</b>	<ul style="list-style-type: none"> <li>● <b>Enforcement:</b> Enforce Safe Systems of Work (SSoW) and promote good practice.</li> <li>● <b>Local Control:</b> Conduct local inductions, inspections, identify and control hazards, and report any issues promptly.</li> </ul>
<b>Logistics &amp; Warehouse Functions (Including Delivery Trucks)</b>	<ul style="list-style-type: none"> <li>● <b>Facility Safety:</b> Responsible for maintaining a safe working environment within all logistics and workshop areas.</li> </ul>

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<p><b>Outsourced Document Services (ODS) &amp; Production Print Management</b></p>	<ul style="list-style-type: none"> <li>● <b>Safe Operations:</b> Responsible for the safe handling, storage, and transport of equipment, including the enforcement of manual handling and mobile plant controls.</li> <li>● <b>Vehicle Safety:</b> Ensure all company-operated delivery trucks and associated lifting equipment are maintained, inspected, and used safely.</li> </ul>
<p><b>Field Engineers / Onsite Technicians</b></p>	<ul style="list-style-type: none"> <li>● <b>Production Safety:</b> Responsible for the safe operation, maintenance, and guarding of high-volume production print and finishing machinery (24/7 operations).</li> <li>● <b>Environmental Control:</b> Ensure effective control of hazards specific to ODS and production, such as dust, noise, heat, and waste handling (shredding/recycling).</li> <li>● <b>Client Asset Management:</b> Ensure the secure and safe storage and handling of client physical documents and data within the facility.</li> <li>● <b>Mobile Worker Safety:</b> Responsible for conducting on-site and job-specific risk assessments (JSA) before commencing work at client locations.</li> <li>● <b>Vehicle &amp; Road Safety:</b> Responsible for the safe operation and maintenance of all assigned company vehicles (cars/vans) and adherence to Apogee's road safety and lone working policies.</li> <li>● <b>Competence:</b> Ensure correct use of PPE and compliance with client site-specific rules.</li> </ul>
<p><b>IT Function</b></p>	<ul style="list-style-type: none"> <li>● <b>Ergonomics &amp; Systems:</b> Responsible for maintaining the reliability of IT infrastructure supporting OHSMS processes and for promoting ergonomic working practices and DSE assessments.</li> </ul>
<p><b>People &amp; Culture Function</b></p>	<ul style="list-style-type: none"> <li>● <b>Competence Management:</b> Ensures employees involved in the OHSMS are trained, competent, and aware of safety standards.</li> <li>● <b>Culture Building:</b> Fosters a culture of accountability and open communication on wellbeing.</li> </ul>
<p><b>All Employees</b></p>	<ul style="list-style-type: none"> <li>● <b>Personal Responsibility:</b> Take reasonable care of their own health and safety and that of others.</li> <li>● <b>Adherence:</b> Comply with company policies and follow safe systems of work.</li> <li>● <b>Reporting:</b> Promptly report any health and safety concerns, defects, incidents, or near misses immediately.</li> </ul>
<p><b>Contractors &amp; Visitors</b></p>	<ul style="list-style-type: none"> <li>● <b>Compliance:</b> Comply with Apogee's site rules and emergency arrangements.</li> <li>● <b>Competence:</b> Provide suitable risk assessments, method statements, and evidence of competence before commencing work.</li> </ul>

#### 4. Policy Requirements

This section outlines the specific requirements that must be followed to ensure Apogee Corporation's commitment to Occupational Health and Safety (OHS) and wellbeing is achieved, aligning with ISO 45001:2018 and our Integrated Management System (IMS).

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## 4.1. OHSMS Framework

Apogee shall establish, implement, maintain, and continually improve an OHSMS in accordance with the requirements of ISO 45001:2018.

- **Legal Compliance:** We shall determine, monitor, and adhere to all applicable legal, regulatory, and statutory requirements across all operating markets (Great Britain (England, Scotland, Wales), Northern Ireland (NI), Republic of Ireland (ROI), Jersey, Germany, and Isle of Man).
- **Worker Participation:** We are committed to consulting with non-managerial workers on the development of our OHS policy, roles, responsibilities, hazard identification, and the determination of controls. This process is formalised through the Communication, Consultation & Participation Procedure and through Safety Committees.

## 4.2. Planning and Risk Management

- **Hazard Identification & Risk Control:** We will systematically determine hazards arising from our activities across all locations and implement controls using the hierarchy of control (Elimination, Substitution, Engineering, Administration, PPE).
- **OHS Objectives:** Measurable OHS objectives will be established at relevant functions and levels, consistent with this policy and detailed in the Register of Safety Objectives & SPIs.
- **Management of Change:** Changes to the OHSMS, operations, or equipment will be carried out in a planned manner using the Change Management Form and the IMS Change Management Process.

## 4.3. Operational Control

Apogee shall implement and control the processes needed to prevent work-related injury and ill-health throughout the service delivery lifecycle:

- **Field Services and Installation:** The Project Management and Field Services teams must ensure a site-specific risk assessment is conducted prior to commencing work at client premises. Safe Work Method Statements (SWMS) or Job Safety Analysis (JSA) must be used for all high-risk or specialized tasks. Lone working risks for field engineers must be assessed and controlled as part of the operational process.
- **Logistics, Warehousing, and Fleet Operations:** All work equipment (including forklifts and lifting gear) shall be maintained safely and monitored using the Equipment Maintenance & Service Log. Formal Manual Handling Risk Assessments must be completed where required by operations. All vehicles, including company cars, vans for field service, and delivery trucks, must undergo scheduled safety maintenance and comply with legal requirements for roadworthiness and driver hours.
- **Outsourced Document Services (ODS) & Production Print Facilities:** Specific Safe Systems of Work (SSoW) must be implemented and enforced for all production print machinery, including operational controls for guarding, lock-out/tag-out (LOTO) procedures, and noise exposure controls. Risk assessments must address the unique hazards of 24/7 operations, including physical security (related to client data storage) and emergency shutdown procedures for high-volume equipment.
- **Office and Facilities Management:** The Facilities Management team, supported by external partners, is responsible for maintaining a safe, accessible, and compliant office environment. This includes regular maintenance of building systems (e.g., HVAC, electrical), clear marking and maintenance of emergency escape routes, and ensuring central management of PPE ordering and distribution for all staff.

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- **Hazardous Substances (COSHH):** Where hazardous substances (such as inks, toners, and cleaning agents) are used in workshops or field services, a formal COSHH Assessment must be completed, communicated, and appropriate control measures implemented.
- **Emergency Preparedness:** Each site shall maintain comprehensive fire, first aid, and evacuation arrangements, which are tested regularly and documented in the Emergency Preparedness Response Matrix.
- **Infrastructure & Equipment:** All work equipment, tools, and infrastructure are subject to the Infrastructure Management Procedure, ensuring they are available, operating safely, and comply with all legal requirements. The physical security and integrity of client data and assets are managed jointly between the OHSMS and the Information Security Management System (ISMS).

#### 4.4. Wellbeing and Health Surveillance

- **Mental Health and Wellbeing:** We promote a supportive culture encouraging open dialogue on mental health, provide access to wellbeing resources, including the Employee Assistance Programme (EAP), and maintain trained mental health first aiders.
- **Health Surveillance:** Health surveillance will be implemented where required by legislation or identified through the Health & Safety Risk Assessment process.

#### 4.5. Partner and Supplier Management

- **Contractor Quality:** All contractors and suppliers must meet Apogee's health and safety standards prior to engagement, reflecting our SafeContractor and CHAS commitments.
- **Assessment:** All third-party partners and suppliers will be assessed using the appropriate audit checklist and held to the same health, safety, and security standards as our own operations (refer to Supplier Due Diligence and Onboarding Policy).

### 5. Consequences

#### 5.1. Business Consequences

Failure to consistently adhere to this policy and the OHSMS procedures can lead to serious consequences, including:

- **Legal & Regulatory Penalties:** Enforcement action, prosecution, and fines from regulatory bodies (e.g., HSE).
- **Reputational Damage:** Severe harm to Apogee's brand image, loss of client trust, and inability to secure new contracts, particularly those requiring high safety standards.
- **Compromised Certifications:** Systemic failure to meet requirements can jeopardise Apogee's ISO 45001 certification within the Integrated Management System (IMS), as well as the loss of SafeContractor and CHAS accreditations.

#### 5.2. Individual Consequences

Employees who disregard safety rules, act recklessly, or fail to adhere to established OHSMS procedures may face disciplinary action, up to and including termination of employment, in accordance with Apogee's People & Culture policies.

### 6. Reporting and Policy Review

#### 6.1. Monitoring and Reporting

Apogee is committed to continuously monitoring and evaluating the effectiveness of its Occupational Health and Safety Management System (OHSMS) and overall health and safety performance. This robust monitoring and reporting framework will include:

- **Auditing:** Internal Audits are conducted as per the IMS Internal Audit Programme.

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- **Performance Measurement:** Ongoing monitoring and measurement of safety performance against defined Leading and Lagging Key Performance Indicators (KPIs), tracked via the Monthly Safety Report.
- **Incident Management:** Incident reporting and investigation shall be conducted using the Incident Investigation & Reporting Procedure to ensure robust root cause analysis and effective corrective actions are implemented to prevent recurrence.
- **Management Review:** Performance data, including audit results and non-conformities, is formally reported to the Executive Leadership Team (ELT) quarterly and reviewed by the ESG Group annually as part of the formal IMS Management Review process.
- **Improvement Tracking:** Corrective and preventive action tracking is systematically managed to ensure the continual improvement of the OHSMS.

## 6.2. Policy Review

This policy will undergo a formal review by the ESG Group (as policy owner), the QHSE Manager, and relevant senior operational leadership on an annual basis.

The policy review will also be triggered sooner if there are:

- Significant changes in legislation, organisational structure, or operational risk across any Group market (Great Britain (England, Scotland, Wales), Northern Ireland (NI), Republic of Ireland (ROI), Jersey, Germany, and Isle of Man).
- Major incidents, significant non-conformities, or material changes in the Integrated Management System (IMS).

The review will ensure the policy's ongoing suitability, adequacy, and effectiveness, ensuring sustained alignment with all applicable laws, ISO 45001, and continuous improvement principles.

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