



Opco 349 Dublin Depot



SAFETY STATEMENT & OHS MANUAL

SAFETY STATEMENT HISTORICAL REVIEW

Version / Year	Changes Made:	Drafted by:	Accepted by:
Rev 01 March 2015	First version new depot	A Martin	P Devine
Rev 02 April 2016	Updated with OHSAS 18001 audit findings, HSA, Corporate feedback, Risk Assessment,	P Devine	D Geary
Rev 03 May 2017	Annual document review Risk assessment review AON and Zurich feedback Brakes integration	R McManus	P Devine

Contents

1.0 INTRODUCTION	6
2.0 SCOPE OF THE OHS MANAGEMENT SYSTEM.....	7
3.0 TERMS AND DEFINITIONS	8
4.0 OHS MANAGEMENT SYSTEM REQUIREMENTS.....	13
4.1 General Requirements.....	13
4.2 OH&S Policy Statement	15
4.3 Planning.....	17
4.3.1 Planning for Hazard Identification, Risk Assessment and Determining Control	17
4.3.2 Legal and Other Requirements.....	19
4.3.3 Objectives and Programmes.....	19
4.4 Implementation and Operation.....	20
4.4.1 Resources, Roles, Responsibility, Accountability and Authority	20
4.4.2 Competence, Training and Awareness.....	28
4.4.3 Communication, Participation and Consultation	29
4.4.4 OHS Management System Documentation.....	32
4.4.5 Document Control	34
4.4.6 Operational Control.....	34
4.4.6.1 Transport and Driving	36
4.4.6.2 Safe Access and Egress	39
4.4.6.3 Chilled/Frozen Warehouses and Food Safety.....	41
4.4.6.4 Welfare Facilities	42
4.4.6.5 Installation, maintenance and use of storage racking.....	44
4.4.6.6 Information on Chemical Substances	45
4.4.6.7 Manual Handling.....	46
4.4.6.8 On Site Vehicles, Tools and Equipment	50
4.4.6.9 Electrical Safety.....	54
4.4.6.10 Chemical Controls.....	55
4.4.6.11 Working at Height.....	56
4.4.6.12 Policy on Preventing and Dealing With Bullying / Harassment at Work.	58
4.4.6.13 Pallas Foods Workplace Violence Policy.....	65

4.4.6.14 Pregnant Employees	68
4.4.6.15 Employee Return & Rehabilitation to Work Policy.....	70
4.4.6.16 Stress Policy	72
4.4.6.17 Employee Assistance Programme	74
4.4.6.18 Smoking Policy	74
4.4.6.19 First Aid	75
4.4.6.20 Members of Public, Contractors, Visitors and Suppliers	76
a. Visitors	76
b. Contractors	77
4.4.6.21 Lone Work.....	78
4.4.6.22 Occupational Exposure to Noise.....	79
4.4.6.23 Personal Protective Equipment	80
4.4.6.24 Ergonomics, VDUs /Computer Work-stations	81
4.4.6.25 Biological hazards/Blood borne Pathogens	83
4.4.7 Emergency Preparedness and Response.....	85
Emergency / Fire / Ammonia	85
a. Emergency Plan	87
b. Fire Prevention Policy.....	87
c. Bomb Threat	89
d. Ammonia	89
4.5 Checking	91
4.5.1 Performance Measurement and Monitoring	91
4.5.2 Evaluation of Compliance	92
4.5.3 Incident Investigation, Non-Conformity, Corrective Action and Preventive Action	92
Disciplinary Action	93
4.5.4 Records	94
4.5.5 Internal Audit.....	94
4.6 Management Review	95
Appendix 1: Risk Assessments	96
Appendix 2: Emergency Response Team.....	98
Appendix 3: Safety Committee Organisation Chart.....	99
Appendix 4 Pallas Foods Opco 349 First Aiders.....	100

Opco 349 Dublin & Depots Safety Statement

Appendix 5: Pallas Foods Opco 349 Safety Representatives.....	101
Appendix 6: Brief for Safety Representatives.....	102
Appendix 7 Emergency Response Phone List	108

1.0 INTRODUCTION

Pallas Foods, as part of the Sysco Corporation has a team of over 1100 people dedicated to providing excellent quality product and services to its customers across the island of Ireland.

We currently service over nine thousand customers from our portfolio of more than eleven thousand products. We are unique in that we offer fresh, frozen, and ambient food products as well as a wide range of non-food products.

We offer next day delivery using our own delivery fleet to ensure that the product arrives as expected by the customer. We operate from two central distribution warehouses in Newcastle West and Dublin, supporting six regional cross docking facilities. There has been a recent addition to the business of four produce specialty depots.

We are committed to helping our customers succeed in the foodservice industry and satisfy consumers' appetites.

We are equally committed to provide a safe and healthy working environment for our employees, customers, contractors and visitors. All requirements under applicable legislation, including the *Safety, Health and Welfare at Work Act, 2005* and the *Safety Health and Welfare at Work Act (General Application) Regulations, 2007* are implemented. This is achieved with the help and assistance of all, by implementing our Health and Safety Management System to the requirements of OHSAS 18001, as outlined in this manual, and by the co-operation of all employees.

2.0 SCOPE OF THE OHS MANAGEMENT SYSTEM

This Safety Statement outlines the OHS Management System at the Pallas Foods Dublin depot and associated cross docking facilities. It meets with the requirements of OHSAS 18001:2007. It will be reviewed at least annually and updated when there have been significant organisational change(s), when it is no longer valid or fit for purpose.

The Safety Statement will be brought to employees' attention on commencement of employment, following any amendments and at least annually - and it will be brought to the attention of other people at the place of work who may be exposed to risks to which it applies, such as contractors and owners of premises we occupy.

The OHS management system applies to the direct and indirect occupational health and safety of Pallas Foods operations and activities in the sites. This Safety Statement is available to all personnel on request.

3.0 TERMS AND DEFINITIONS

3.1 Acceptable Risk:

Risk that has been reduced to a level that can be endured by the organisation having regard to its legal obligations and its Health & Safety policy.

3.2 Accident:

Unplanned, undesired event giving rise to death, ill health, injury.

3.3 Audit:

Systematic, independent and documented process for obtaining “audit evidence” and evaluating it objectively to determine the extent to which “audit criteria” are fulfilled.

3.4 Continual Improvement:

Process of enhancing the OHS management system to achieve improvements in overall OHS performance in line with Pallas Foods health and safety policies.

NOTE: The process need not take place in all areas of activity simultaneously.

3.5 Hazard:

Source, situation, or act with a potential for harm in terms of human injury or ill health, or a combination of these.

3.6 Hazard Identification:

Process of recognising that a hazard exists and defining its characteristics.

3.7 Health and safety:

Conditions and factors that affect the well-being of employees, temporary workers, contractor personnel, visitors and any other person in the workplace.

3.8 Health and Safety Authority (H.S.A.)/H.S.A Reportable accidents

The Health and Safety Authority is the national statutory body with responsibility for enforcing occupational safety and health law, promoting and encouraging accident prevention, and providing information and advice to all companies, organisations and individuals.

H.S.A. reportable accidents are accidents resulting in more than three days lost time, or in a fatality, or resulting in medical treatment to a person not employed by the company.

3.9 Interested Party:

Individual or group concerned with or affected by the OHS performance of an organisation.

3.10 Incident:

A hazardous event where no harm occurs and that has the potential to lead to an accident.

NOTE: An incident where no ill health, injury, damage, or other loss occurs is also referred to as a "near-miss". The term "incident" includes "near-misses".

3.11 Ill health

Any abnormal condition or disorder, other than one resulting from an occupational injury, caused by exposure to factors associated with employment.

3.12 Occupational Safety and Health Administration (OSHA)/OSHA recordable

OSHA is the main United States federal agency charged with the enforcement of safety and health legislation.

OSHA recordable accidents are accidents which result in medical treatment or lost time from work, as defined by OSHA, and as recorded by Pallas Foods as an indicator of performance comparable with its U.S. operations.

3.13 OHSAS:

Occupational Health and Safety Assessment Series

NOTE: OHSAS 18001 is not an International Standard Organisation (ISO) standard.

3.14 OHS Management System:

The part of the overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the health and safety policy.

3.15 OHS Management System Audit:

A systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organisation's OHS management system conforms to the OHS management system audit criteria set by the organisation, and for communication of the results of this process to management.

3.16 OHS Objective:

Overall OHS goal, arising from the health & safety policy, that an organisation sets itself to achieve, and which is quantified where practicable.

3.17 OHS Performance:

Measurable results of the OHS management system, related to an organisation's control of its environmental aspects and OHS risks, based on its environmental and health & safety policies, OHS objectives and targets.

3.18 OHS Policy:

Statement by the organisation of its intentions and principles in relation to its overall health and safety performance, which provides a framework for action and for the setting of its health and safety objectives and targets.

3.19 OHS Target:

Detailed performance requirement, quantified where practicable, applicable to the organisation or parts thereof, that arises from the OHS objectives and that needs to be set and met in order to achieve those objectives.

3.20 Organisation:

Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.

NOTE: For organisations with more than one operating unit, a single operating unit may be defined as an organisation.

3.21 Reasonably Practicable:

Means that an employer has exercised all due care by putting in place the necessary protective and preventive measures, having identified the hazards and assessed the risks to safety and health likely to result in accidents or injury to health at the place of work concerned and where “putting in place of any further measures is grossly disproportionate having regard to the unusual, unforeseeable and exceptional nature of any circumstance or occurrence that may result in an accident at work or injury to health at that place of work.”

Note: This is defined in guidelines to the Safety Health and Welfare at Work Act 2005

3.16 Risk:

Combination of the likelihood and consequence(s) of a specified hazardous event occurring.

3.17 Risk assessment:

Process of evaluating the risk arising from a hazard, taking into account the adequacy of any existing controls, and deciding whether or not the risk is acceptable.

3.18 Safety:

Freedom from unacceptable risk of harm [ISO/IEC Guide 2].

3.19 Workplace

Any physical location in which work related activities are performed under the control of the organisation.

3.20 OHS / OH & S

Occupational Health & safety.

3.21 EHS / EH & S

Environmental Health & safety.

3.22 SSOW/SSWP

Safe System of Work/Safe System of work Plan.

4.0 OHS MANAGEMENT SYSTEM REQUIREMENTS

4.1 General Requirements

Pallas Foods has implemented an OHS management system in order to improve its health & safety performance. Improvements in the OHS management system are intended to translate into improved occupational health and safety performance. The requirements of the OHS management system are described throughout this document. A description of the main duties and responsibilities of the site management representative and other key personnel are outlined in Section 4.4.1 of this Safety Statement.

The OHS management system is supported by top-level management. This commitment to the OHS Management System is demonstrated by the provision of adequate resources for the effective implementation and maintenance of the OHS management system and by the participation of top-level management in setting of the Health & Safety Policy, OHS objectives and targets and in management reviews of the OHS Management System.

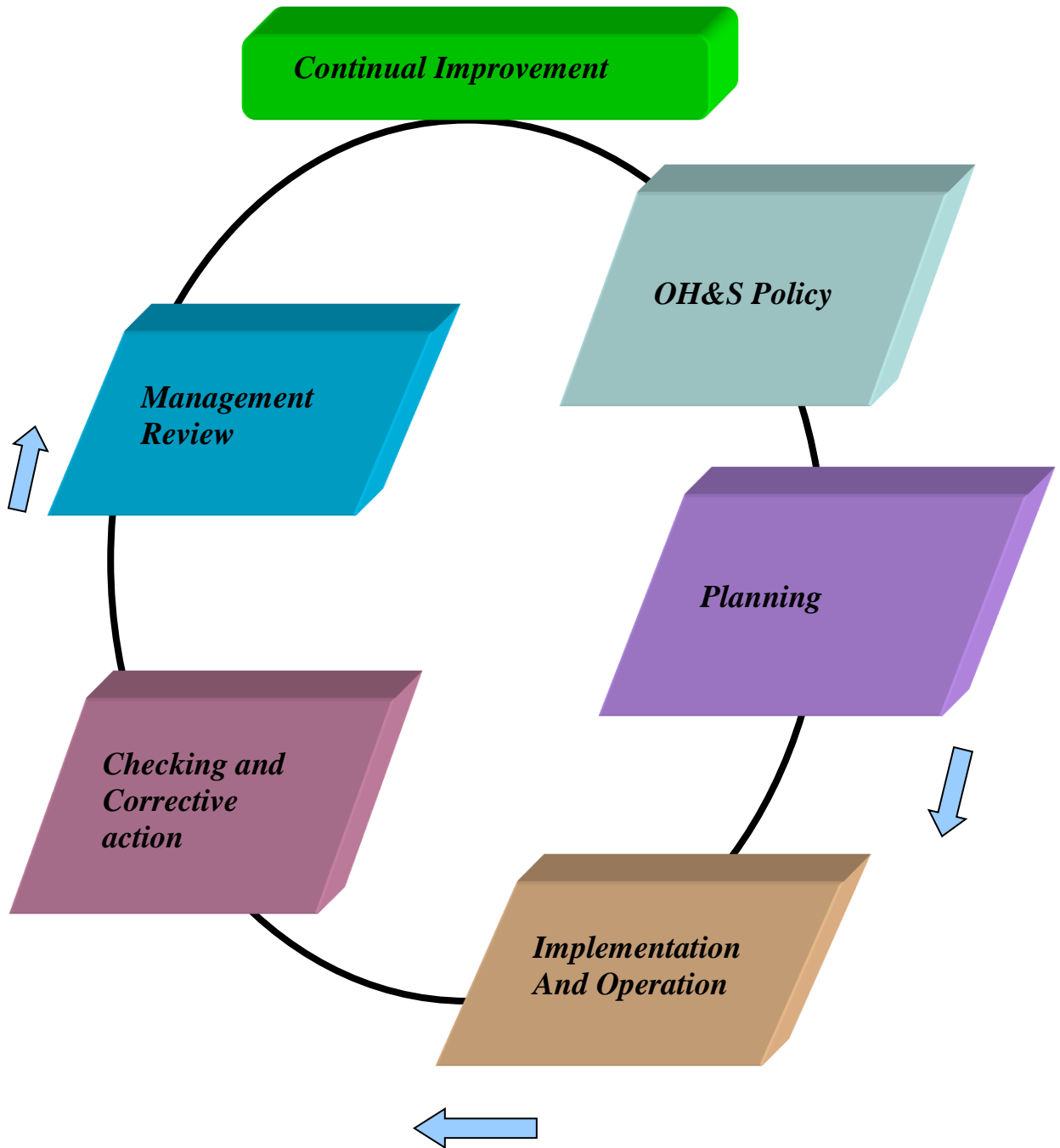


Figure 1 — Elements of successful OH&S management

Note: The OHSAS standard is based on the methodology known as Plan-Do-Check-Act (PDCA) which can be briefly described as follows:

- **Plan:** establish objectives and processes necessary to deliver results in accordance with the organization's OH&S policy.
- **Do:** implement the processes.
- **Check:** monitor and measure processes against OH&S policy, objectives, legal and other requirements, and report the results.

- **Act:** take actions to continually improve OH&S performance.

4.2 OH&S Policy Statement

Pallas Foods has produced an Environmental, Health & Safety Policy statement. This was devised by senior management in respect of occupational health and safety risks of Pallas Foods's activities, products and services.

The Environmental, Health and Safety Policy is endorsed by Pallas Foods Senior Management.

This policy is communicated to all employees through induction and awareness training and posting in prominent locations, on notice boards and through the intranet. It is also visible to visitors through posting at the reception area.

This Policy shall be reviewed on an annual basis as part of the OHS Management Review to ensure that it continues to provide direction to the activities of the organisation and that these remain relevant.

Environment and Safety Policy

It is the policy of Pallas Foods to provide a nationwide next day delivery service of top quality products to the food service industry without risk to the environment or to the safety, health or welfare of employees, contractors, visitors and members of the public. Our key safety objective is to provide a safe place of work for our employees, visitors and contractors. Our key environmental objective is to minimise our negative impacts. We will manage our environmental, health and safety hazards and risks in compliance with all legal and other requirements. We will strive to continually improve our environmental, health and safety performance. Pallas Foods is committed to the prevention of pollution, accidents, injuries and ill health by identifying and eliminating the causes and potential causes of hazards to health, safety and the environment.

We will achieve this, so far as is reasonably practicable:

- Providing appropriate information, instruction and supervision necessary to ensure the safety, health and welfare of our employees and others while at work, and to protect the environment. All employees shall receive adequate health and safety training and will only be allocated tasks suitable to their skill level and level of training.
- Appropriate equipment will be provided for work activities. All equipment will be appropriately maintained while in use.
- A safe place of work will be provided for all employees and others, so they may complete their work without risk of injury.
- All EH&S accidents, near misses or safety observations highlighted to Pallas Foods will be investigated and appropriate control measures implemented to prevent a recurrence.
- Adequate resources will be provided by Pallas Foods to ensure a safe and healthy working environment. Where necessary, the services of a competent person will be obtained for the purpose of ensuring the safety of its employees while at work.
- The Company will identify and comply with all EH&S legislative requirements and appropriate guidelines, in order to maintain a healthy and safe working environment.
- Risk assessments will be completed for all tasks and hazards which pose a significant risk due to our activities. Control measures identified will be appropriate for the hazard identified and will be communicated to the relevant employees.
- Environmental aspects and impacts will be assessed and appropriate controls maintained.
- The Company will prevent accidents, ill health and pollution. We will continuously improve our environmental, health and safety performance through setting objectives and targets and implementing improvement programs. These objectives and programs will be linked to the most significant EH&S hazards and risks where possible.
- Appropriate plans will be provided and communicated, in the event of an emergency in Pallas Foods. In addition, adequate fire detection and prevention systems will be installed and maintained.

This Policy will be communicated to employees and contractors and is available to the public on request at our premises.

Signed: _____

Date: 05th May 2017

Dan Geary - ***President***

4.3 Planning

4.3.1 Planning for Hazard Identification, Risk Assessment and Determining Control

Pallas Foods has established and maintains a method for identification of hazards and assessment of the associated levels of risk and this is detailed in procedure EHS-011 Hazard Identification and Risk Assessment.

Risk Assessments have been conducted of all Pallas Foods work activities. As they form part of this Safety Statement, they are available as required to all employees, contractors and customers. The risk assessment process involves the following:

- Identifying the hazards associated with our activities.
- Identifying what risks are associated with each of the hazards identified.
- Recording the probability and severity of injury/illness associated with the hazard.
- Calculating the risk rating based on probability and severity (the risk rating is arrived at by multiplying the probability of injury x severity of injury - see SOP EHS-011).
- Actions are suggested to reduce the risk (control options) in order to ensure that risks are reduced to the lowest level reasonably practicable (see hierarchy of controls below).
- The hazards identified with a 'High' risk rating should be those that receive immediate attention. The implementation of the actions to reduce the risk should have a high priority.

Risk assessments are reviewed periodically and any necessary amendments made. They are also reviewed if there is a change in circumstances e.g. new equipment, processes, procedures etc., following an accident or incident and in the event of new legislation, codes of practice or new guidance being published.

Risk assessments carried out include the following:

- General Task Based Risk Assessments (e.g. delivery, warehouse etc.)
- Specialised Risk Assessments (e.g. VDU workstations, pregnant employees, chemical risk assessments, Manual Handling etc.)
- Incident investigations

The hierarchy of control is applied, as described in the Safety Health and Welfare at Work Act 2005.

Subcontractors and other third parties performing work on behalf of Pallas Foods are controlled. Pallas Foods examines relevant safety statements and method statements of contractors.

The results of risk assessments are documented and referenced in the Safety Statement and relevant assessments are issued to all employees and contractors of Pallas Foods. This Safety Statement and risk assessments are reviewed regularly and updated as required.

The results of risk assessments are considered in setting the OHS policy and objectives and targets for the year.

The company's management of risk reflects the principle of elimination of hazards where practicable, followed by risk reduction and then the adoption of personal protective equipment (PPE) as a last resort.

Pallas Foods encourages all staff to report hazards to their immediate supervisor in the first instance. It is the local supervisors, frontline and operational manager's responsibility to ensure that the reported hazards, accidents or incidents are addressed or escalated in a timely manner.

The entire Health & Safety Management System is based on continual hazard identification, risk assessment and risk control carried out on a proactive basis.

Related Documents

- Clause 4.3.1 OHSAS 18001
- EHS-011 Hazard Identification and Risk Assessment

- Pallas Foods Risk Assessment Form
- Completed risk assessments (Appendix 1)

4.3.2 Legal and Other Requirements

Pallas Foods identifies its legal and other requirements (e.g. corporate OHS requirements, licences etc.) through periodic reviews of compliance with legislation, in consultation with external bodies where appropriate. An external consultancy provides the company with an online register of legislation, which is continuously updated and facilitates compliance assessment.

Pallas Foods subscribes to OHS periodicals and information sources, including NISO, in order to keep up to date with forthcoming EH&S legislative changes which may be applicable to the organisation. Such information sources include:

- HSA and HSE websites

The requirements of new legislation or obligations are communicated to relevant levels and functions within Pallas Foods.

Related Documents

- EHS-012 Legal and Other Requirements and Compliance Evaluation
- Clause 4.3.2 OHSAS 18001

4.3.3 Objectives and Programmes

Pallas Foods has established and maintains documented OHS objectives and targets.

In setting and reviewing OHS objectives and targets the following are considered:

- legal and other requirements including Corporate
- risk assessment results and the Risk Register
- technological options
- financial, operational and business requirements
- views of interested parties

- Codes of Practice

The objectives and targets are designed to be consistent with the Pallas Foods Health & Safety Policy including the commitment to comply with legal and other requirements and to continual improvement.

The relevant managers or supervisors are nominated as having overall responsibility for individual objectives and targets. Objectives and targets shall be reviewed on a regular basis by the EHS Manager to ensure that sufficient progress towards achievement of these objectives is being made. Where it is identified that targets are not being achieved, a root cause analysis shall be carried out to identify the reasons for the lack of progress and if necessary, the issue shall be escalated to Senior Management for their consideration.

Related Documents

- Objectives and Targets
- Minutes of Management Reviews
- Clause 4.3.3 OHSAS 18001

4.4 Implementation and Operation

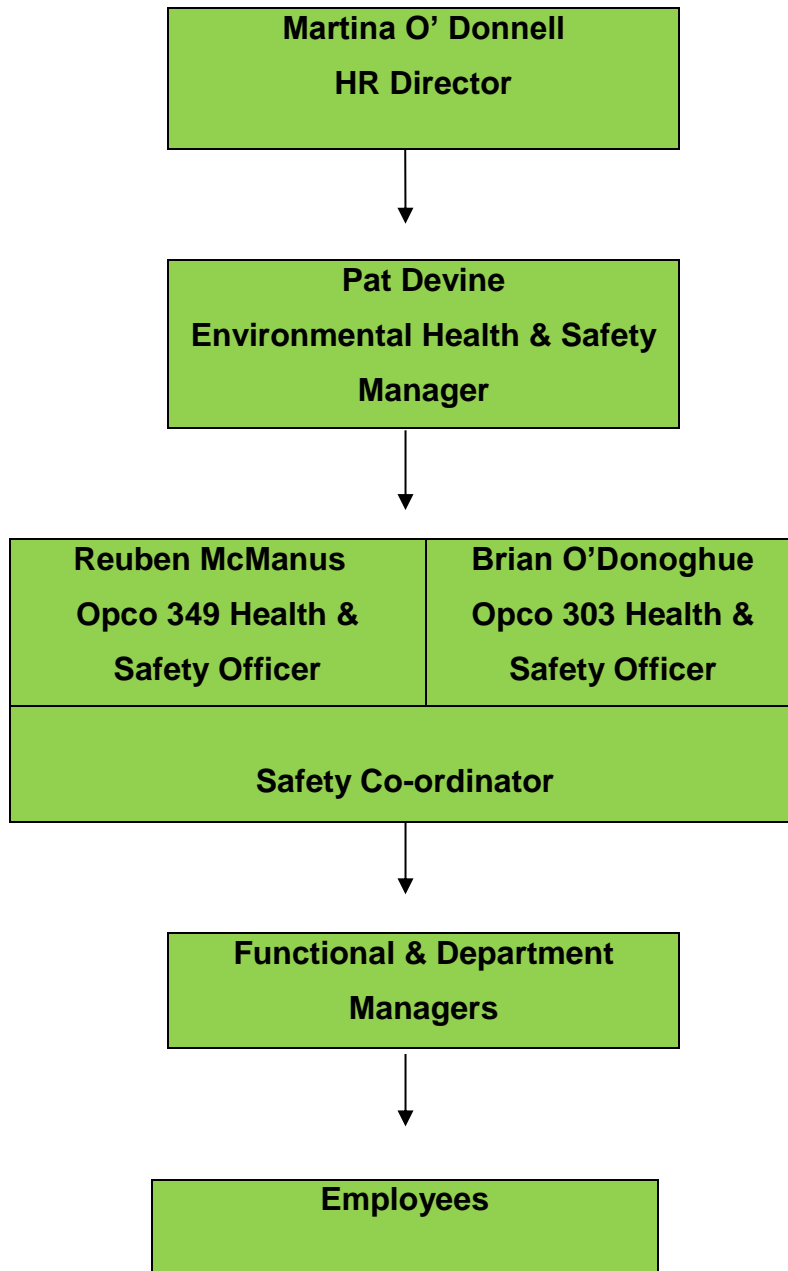
4.4.1 Resources, Roles, Responsibility, Accountability and Authority

Safety Management Structure

The persons or titles listed below, within the company safety management structure are responsible directly or by formal delegation for:

- The effective implementation of the safety policy ensuring that their areas of responsibility are run in accordance with the policy.
- Ensuring that all employees are trained to manage the implementation and ongoing monitoring of this safety policy.

Safety Management Structure in Pallas Foods



Responsibilities

Activities and Responsibilities for Health & Safety under the *Safety, Health and Welfare at Work Act, 2005*.

President

Dan Geary is the individual within the company with ultimate accountability for the activities and results of the business. Safety begins at management level and the overall responsibility for the establishment and maintenance of an effective policy for Safety, Health and Welfare at Work is vested with the president and Directors.

The **Director of Operations** Ian Smith has been delegated the day to day responsibility for Health and Safety within this company. Acceptable health and safety practice will be achieved through the effective operation of a safety management system, safe systems of work, procedures and full employee co-operation.

The Director of Operations shall:

- Demonstrate a commitment to safety, health and welfare by taking active steps to be aware of the safety record of the business and shall issue any necessary reasonable directives in the interest of the safety, health and welfare of all employees and third parties.
- The Director of Operations will endeavour to ensure that there are sufficient financial resources and facilities available to sustain the Safety, Health and Welfare programmes.
- On an annual basis, appraise the effectiveness of the safety statement and the safety management system operated by Pallas Foods.
- Ensure that the responsibility for safety, health and welfare is properly assigned, understood and accepted at all levels of the management team.

- Procure advice and assistance from consultants whenever necessary and take heed, together with remedial action, on any matters brought to his attention in relation to safety, health and welfare.
- Know the appropriate statutory requirements affecting the Company's operations.
- Ensure that appropriate training is given to all staff as necessary.
- Insist that sound working practices are observed as laid down by Codes of Practice and that work is planned and carried out in accordance with the statutory provisions.
- Ensure that tenders are adequate to allow for proper welfare facilities, safe working methods and equipment to avoid injury, damage and wastage and that health and safety factors are considered in the selection of sub-contractors.
- Institute reporting, investigations and costing of injury, damage and loss, promote analysis of investigations to discover trends and eliminate hazards.
- Reprimand any member of the staff failing to discharge satisfactorily their responsibilities for health and safety.
- Instigate liaison with external accident prevention organizations, encourage the distribution of safety literature throughout the Company.
- Take prompt corrective action where unsafe conditions and/or unsafe acts are noted, or identified through accident/incident investigations.
- Ensure that all relevant health, safety and welfare information regarding new methods of accident prevention, new legislative requirements and codes of practice are acted upon in so far as is reasonably practical.
- Ensure that any member of staff failing to comply with the safety policy is subject to the company disciplinary process.

Managers and Supervisors

Pallas Foods Managers are directly accountable to their respective Directors and assume the role of devolved responsibility as direct representatives of Pallas Foods as the employer. Safety is a line management responsibility under statute and common law. In this role they are also required to assume all of the obligations inherent in the legislation referring to the duties of the employer and reinforce Pallas Foods compliance with regard to health and safety as detailed by the Director of Operations and the Board of Directors.

The following Duties are common to all Pallas Foods Managers.

- Communicate Health and Safety at work by personal example.
- Ensure that the Company Safety Statement and other safety guidance is communicated, observed, understood and implemented.
- Ensure that all processes and procedures are completed safely and free from ill health.
- Ensure activities are planned so that they may be carried out safely.
- Ensure that only competent personnel adjust, operate and maintain machinery or equipment.
- Ensure that the safety of lesser-experienced employees is never in jeopardy, from the work they are doing.
- Where personal protective equipment (P.P.E.) is provided, that it is worn, used & maintained.
- Ensure that adequate safety training is provided if necessary and availed of by employees.
- Ensure that employees are aware of actions to be taken in case of an emergency.

- Ensure good housekeeping standards are maintained and in particular access / exit routes as well as fire exits and fire points are never obstructed.
- Ensure all incidents, accidents and dangerous occurrences are thoroughly investigated and remedial actions implemented.
- Ensure that changes in processes, procedures or equipment by way of new purchases, maintenance or addition of new plant, takes full account of health and safety and does not endanger the safety and health of any employee.
- Considering and supporting any representation regarding Health and Safety from employees.
- Provide effective supervision throughout all working practices in this Company.
- Take direct interest in the Health and Safety of the employees.
- Ensure that all mandatory and relevant training in Health and Safety is carried out at all levels, and that all staff are fully aware of their responsibilities.

EHS Manager/Officer and Safety Management Representative

The EHS Manager is the Management Safety Representative for the Safety Management System and communicates regularly with senior management on health and safety performance and resources. The EHS Manager advises the company on requirements for ensuring that the Safety Policy is implemented.

Specific activities and responsibilities delegated to the EHS Officer are outlined below:

- Co-ordinate the organisation's health and safety management system.
- Advise management on Health & Safety Regulations, Codes of Practice and Corporate requirement.

- Ensure that the Safety Statement including risk assessments is periodically evaluated and revised.
- Ensure that all employees have access to the Safety Statement and have read and understood it.
- Ensure regular inspections of premises are carried out and remedial action taken where necessary.
- Monitor the performance of safe systems of work and current safe operating procedures. Implement improvements as required.
- Ensure that induction and safety training of all employees is carried out.
- Ensure that sufficient numbers of staff are trained and hold the positions of first aider and fire warden.
- Develop a proactive approach to accident/incident prevention.
- Ensure that an accident report form is completed for all accidents and that all accidents are investigated.
- Report all relevant accidents and dangerous occurrences to the HSA (Health & Safety Authority).
- Monitor the systems for ensuring that fire precautions are adequate.
- Ensure that a minimum of two emergency evacuation exercises are carried out on an annual basis.
- Promote safety awareness and positive safety behaviours in all groups.

Employees

Employees have general statutory obligations under the *Safety, Health and Welfare at Work Act, 2005, Chapter 2 Section 13*, which includes the following:

Employees must:

- Comply with the relevant statutory provisions, as appropriate, and take reasonable care to protect his or her safety, health and welfare and the safety, health and welfare of any other person who may be affected by the employee's acts or omissions at work,

- Ensure that he or she is not under the influence of an intoxicant to the extent that he or she is in such a state as to endanger his or her own safety, health or welfare at work or that of any other person,
- If reasonably required by his or her employer, submit to any reasonable and proportionate tests for intoxicants by, or under the supervision of, a registered medical practitioner who is a competent person, as may be prescribed,
- Co-operate with his or her employer or any other person so far as is necessary to enable his or her employer or the other person to comply with the relevant statutory provisions, as appropriate,
- Must not engage in improper conduct, horseplay or other behaviour that is likely to endanger his or her own safety, health and welfare at work or that of any other person,
- Attend such training and, as appropriate, undergo such assessment as may reasonably be required by his or her employer or as may be prescribed relating to safety, health and welfare at work or relating to the work carried out by the employee,
- Having regard to his or her training and the instructions given by his or her employer, make correct use of any article or substance provided for use by the employee at work or for the protection of his or her safety, health and welfare at work, including protective clothing or equipment,
- Report to his or her employer or to any other appropriate person, as soon as practicable:
 - any work being carried on, or likely to be carried on, in a manner which may endanger the safety, health or welfare at work of the employee or that of any other person,
 - any defect in the place of work, the systems of work, any article or substance which might endanger the safety, health or welfare at work of the employee or that of any other person,or

- any contravention of the relevant statutory provisions which may endanger the safety, health and welfare at work of the employee or that of any other person, of which he or she is aware.

A person shall not intentionally, recklessly or without reasonable cause:

- misuse, damage or interfere with anything provided under the relevant statutory provisions or otherwise for securing the safety, health and welfare of persons at work, or
- place at risk the safety, health or welfare of persons in connection with work activities.

In addition, employees are reminded:

- Only carry out duties you are trained to perform.
- Keep work areas clean and uncluttered.
- Be careful when moving items.
- Do not run.
- Any form of dangerous pranks or unauthorised hazardous activities is totally prohibited on company premises.

4.4.2 Competence, Training and Awareness

Pallas Foods is committed to providing appropriate health and safety training for all employees, which will be sufficient to meet the company's obligations under the *Safety, Health and Welfare at Work Act, 2005* and other relevant legislation. The primary responsibilities for this rests with management in co-operation with specialists as appropriate and the Company expects that all employees will co-operate in any training provided.

All employees employed by Pallas Foods will receive induction training to ensure that they fully understand the hazards of the environment and what safety precautions and emergency procedures are required. The training shall involve an introduction to the company's Safety Statement.

The Safety Representative(s) will receive the necessary training as recommended by the HSA to carry out his/her role effectively. Training will be given, as necessary, to Management to ensure that they have the necessary skills and knowledge to organize the work safely and without risk to health;

Training records will be maintained and will contain the following information:

- Date of training instruction or exercise,
- Duration of the training course,
- Name of Instructor delivering the training,
- Name of person's undertaking the training,
- Nature and content of the training course.

Additional training courses will be provided to meet specific needs as they arise from time to time. Such courses may be carried out in-house or at an appropriate outside agency. All employees are required to co-operate with the company in the implementation of its training programme.

Related Documents:

- OHS Training Records
- Safety Training Matrix

4.4.3 Communication, Participation and Consultation

Pallas Foods has a strong focus on internal health and safety communications within the organisation and where required will also engage in any external communications with community groups, regulatory authorities, stakeholders and interested parties.

Pallas Foods is committed to meeting its obligations under Part 4, Section 25, of the Safety, Health and Welfare at Work Act 2005 on consultation. The Company is committed to a policy of co-operation and consultation between management and staff and will take account of any representations made by staff members including anonymous, ref safety suggestion box.

Consultation will be by Safety Committee Meetings, which will be held in accordance with the guidance set down by the Health and Safety Authority and these meetings will be chaired by the Opco 349 EHS Officer, the person responsible for Health & Safety. The Safety Representative Committee is made up of representatives from Warehouse, Transport, Tele-sales and Butchery operations and received QQI Level 5 training to qualify them in their role. Management also include the driver representative in decision making and studies to ensure driver involvement. The Safety Committee normally meets once a month to discuss all employees concerns. Minutes from this meeting are circulated to management and employees and signed off by participants of the meeting and posted on employee notice boards

Health and Safety will also be an integral part of all management meetings occurring on a periodic basis. Department managers including, Warehouse, Transport, HR Department, Facilities, Systems, Butchery, Inventory etc. as well as one of the Safety Representatives, meet to discuss items brought up at the Safety Representative Committee meeting or any other safety issues deemed relevant. The Safety Management Committee normally meets once a month. Minutes from this meeting are circulated to management and employees and signed off by participants of the meeting and posted on employee notice boards.

In addition, the Senior Management Team (Safety Steering Group) holds regular Health and Safety meetings to review progress in the implementation of the safety management system and to establish whether change management has integrated safety.

This Meeting is normally held every second month and is made up of the Pallas Foods Senior Management including the Company President, Financial Director, Operations Director, HR Director and EHS Manager. This meeting deals with the strategic planning and decision making process, with a brief on the current Health and Safety trends and issues from safety committee meetings, Legal compliance and processes and the implementation of companywide Health & Safety policy. The agenda for these meetings has been changed since last revision to allow a more proactive approach (inclusion of current risk load, legal compliance and change management) and more active participation by the operations management team including feedback and concerns from depot managers.

The safety representative(s), on appointment, will be given the opportunity to receive appropriate on-going training. In this respect, they will undertake a safety representative course, and will be given the option of undertaking further training if necessary. Safety representatives will be given access to information as is necessary to fulfil their function and will be notified of any visit by a Health and Safety Authority Inspector. The safety representative will be expected to assist the HSA Inspector in order for them to discharge all of their functions under Part 4, Section 25(1), of the Safety, Health and Welfare at Work Act, 2005. Safety representatives will not be placed at any disadvantage as result of fulfilling their role.

The Health & Safety Manager will be responsible for co-ordinating consultation with the work force and providing appropriate information to the work force and their nominated safety representatives on all matters pertaining to safety, health and welfare.

The effectiveness of the consultation arrangements will be reviewed at regular intervals. Pallas Foods recognizes the statutory rights of a safety representative as set out in Part 4, Section 25 (1), of the Safety Health and Welfare at Work Act, 2005, and is committed to co-operating with that person selected. Pallas

Foods also considers any external communications each year at the Management Review. Any related decisions are recorded in the minutes of the review meeting. Employees are encouraged to participate in health and safety improvement through a number of mechanisms:

- Reporting of incidents including hazards, near misses and all accidents
- Participating in risk assessments
- Attendance at Safety Meetings
- Training and participation as First Aiders, Fire Wardens, Fire Team

Appendix 4. Contains the Safety Representative Brief for Pallas Foods

Related Documents

- OHS Management Review Meeting Minutes
- Safety Committee Meeting Minutes
- Safety Representative Brief (Appendix 4)
- Employee Handbook
- Safety Committee Organisation Chart (Appendix 3)

4.4.4 OHS Management System Documentation

The Structure of Health & Safety Documentation relating to the management system in Pallas Foods is as follows:

Tier 1	Legislation - European, National and Industry specific, approved Codes of Practice, industry Guidelines, Corporate requirements
Tier 2	Health & Safety Policy, Safety Statement and OHS Manual
Tier 3	Pallas Foods Internal Health & Safety Procedures; EHS Management Programme
Tier 4	Inspection Checklists, Risk Assessment Templates, Accident / Incident Report Forms, Auditing Templates / Schedules
Tier 5	Records: Training, accidents / incidents, risk assessment, inspections, corrective actions etc.

The OHS Management System is adequately and systematically documented as outlined above.

This Safety Statement is an integral part of the Pallas Foods overall management system. It describes the procedures for operating and maintaining the company's OHS Management System.

The Safety Management System clauses and documentation interact in the following way:

This Health and Safety Statement and the Pallas Foods EH&S Policy are the core documents for which purpose the Occupational Health and Safety (OHS) Management System is maintained. The Safety Statement and Policy are aimed at managing the significant occupational safety hazards and legal/other requirements of the company as a priority. Occupational health & safety hazards are identified and risk assessed and recorded in the Safety Statement. Significant legal requirements apply to these and indeed the Safety Statement is a document required by law. Once identified, significant occupational hazards are managed through Operational Control Procedures and are improved through objectives set out in the OHS Management Programme. System Procedures ensure supporting functions such as auditing, monitoring, compliance evaluation, training, corrective actions and reviews are implemented. The entire system and its documentation are described in this OHS Manual.

Documentation related to the health and safety management system is set-out throughout this OHS Manual.

4.4.5 Document Control

Documentation and Distribution of the Safety Statement

The health & safety department shall hold the master copy of the Safety Statement on the company premises and ensure that a copy of the Safety Statement will be available to all employees and contractors in hard copy and soft copy format.

Dan Geary, President is responsible for the issue of revised Safety Statements. To ensure that each copy of the Safety Statement contains a record of all changes, the person responsible for Health & Safety will record changes as per Document Control Procedure EHS-06.

Once signed off, this document is a public document and will be made available, upon request to Pat Devine the EHS Department Manager or a member of the EHS Department team.

4.4.6 Operational Control

At Pallas Foods we determine what activities associated with our operations present the hazards and risks. We implement and maintain procedures and controls to combat these hazards and risks. All activities associated with high level risk are managed by means of operational control procedures and/or by the setting of an OHS improvement objective.

Documented procedures and Safe Systems of Work (SSOWs) Safe System Work Plans (SSWP) exist which encompass Pallas Foods activities and processes which significantly affect or have the potential to significantly affect occupational health and safety.

It is the policy of Pallas Foods to ensure that tasks are within the competence and capacity of each employee and the systems of work will be designed with that purpose in mind. They will include consideration for the safety and health of visitors/contractors.

Operational controls have been implemented in line with our principle activities and operational areas, as identified in the hazard identification and risk assessment process. Personal Protective Equipment is provided as required and used where there is a residual risk as specified in the risk assessments.

PPE includes:

- Protective clothing (for example in the freezer and chill environments of the warehouse)
- Safety footwear
- Hi-vis clothing
- Hard hats (for external work at height)
- Hearing protection for specific tasks
- Eye protection for maintenance work
- Hand protection when using sharp tools or equipment (e.g. in the butchery)
- Harnesses and lanyards for work at height
- Mobile phones, radios, lone work alarms
- Vehicle personal safety devices such as seat belts

PPE will be signed for by employee receiving it

Where applicable the PPE must be certified to the relevant Euro-norm standard (EN) and carry the CE mark, for example:

- Eye protection (e.g. safety glasses) to comply with EN166
- Head protection (e.g. bump hat) to comply with EN 812
- Safety footwear to comply with EN ISO 20345, 20346, 20347
- Hi-visibility vest and jackets to comply with EN 471.
- Hearing Protection including Ear muffs to comply with EN 352-1 and ear plugs to comply with EN 352-2

- Specific safety gloves must comply with EN 388 (Mechanical hazard protection), EN 407 (Temperature protection) and EN 374 (Chemical hazard protection)
- Safety harnesses to comply with EN 361 and associated lanyards with EN 355.

4.4.6.1 Transport and Driving

Pallas Foods operates a fleet of delivery trucks and sales vehicles all around Ireland. Driving poses significant hazards with regard to the potential for collisions or loss of control of the vehicles. Specific training for each group is provided annually.

Delivery Drivers are exposed to the hazards of manual handling and potential slips, trips or falls while loading and unloading their vehicles and while making deliveries. Chemicals are carried on the vehicles for many customers in the retail and hospitality sectors and a DGSA has been engaged to identify improvements in controls. Delivery drivers are also lone workers once they leave the depot and commence work on their delivery routes.

Pallas Foods has implemented the following controls in order to minimise the risk during transport and driving:

- Tachographs installed in each vehicle and use is monitored and controlled. Drivers must take breaks as required.
- Driver's seat is specially designed to reduce vibration.
- Mobile phones must not be used while driving.
- All drivers are trained and assessed to be competent and qualified to drive vehicles and hold a relevant class, in date driver's licence for the vehicle they are operating.
- No unauthorised personnel are permitted in Pallas vehicles
- Vehicles are regularly maintained by an approved and competent contractor.
- Speed limiter on the delivery vehicles is set to 85 km/hour.

- We continue to install sensors and cameras to assist with parking and tight spaces.
- Equipment including combis which are used for carrying products on delivery vehicles are maintained and repaired as necessary.
- All drivers trained in manual handling.
- Maximum weight of an individual item is 25 kg.
- All drivers receive specific transport related chemical training.
- All trucks are equipped with spill kits.
- Drivers are lone workers (ref. Pallas Foods Lone Work procedure EHS-03) and communications is important in managing lone work. Drivers have mobile phones and hand-free sets which can be used in the event of accident, illness or emergency.
- Drivers must protect their own safety as the priority in any conflict situations.
- Maintenance and repair of Tail Lifts and doors as required.
- Drivers are familiar with routes and avoid overloading trolleys as necessary applicable to the route.
- Drivers will be competent as per their CPC in assessing and securing their loads.
- Safety footwear is mandatory and gloves are worn as necessary.
- Delivery drivers will maintain their vehicle and trailer area in good order and condition so as to avoid hazards or injury.
- Drivers are responsible for parking legally.

In Pallas Foods the drivers have to carry out a wide range of activities which includes not only the driving of the vehicle but the unloading of the vehicles off site at multiple clients premises. We have a wide range of safe working practices and procedures that the drivers must follow whilst carrying out their duties.

All Pallas Foods drivers undergo continuous training to enable them comply with these procedures to ensure their safety needs are met as well as the needs of members of the public and customers. These procedures are then signed off by the drivers and added to their training records .In the case of new clients the relevant Sales Manager/Rep must carry out a site specific safety observation (*K-Drive-Shared-H&S*) on the clients premises and on the activities that drivers will be required to carry out to ensure the correct control measures are in place for our staff to complete their duties without a risk to their safety and health.

Pallas Foods staff should always familiarise themselves with emergency exits and fire points whilst on a client's premises and comply with site specific rules, if not aware of these rules it is the drivers responsibility to ask at security or a point of contact.

- Each Delivery vehicle, where applicable, is fitted with digital tachographs and trackers. These enable us to monitor the speed limit imposed on the roads are been adhered to by the driver .They also allow us to monitor the amount of driving hours the driver has completed to ensure they comply with the legislation. Speed limiters have been fitted to the delivery vehicles, and are set to 85 km/hour.

Pallas Foods have created a drivers handbook which outlines to the driver all the safe working procedures such as correct manual handling techniques for loading and unloading the vans in a safe manner. This handbook also contains a list of to do's and don'ts for example;

- You cannot use any auxiliary equipment without having had the relevant training and where applicable, the subsequent SWP (safe working practice / procedure) signed off by you and the form filed in your training document. Examples below;
 - Tail-lifts
 - Using a mobile telephone including fixed (including hands free);
 - When using a hands free device you should stop in a safe place before using the phone

- Never use a mobile phone that is not hands free at any time whilst the vehicle is either moving or the engine is running
- **Seat belts.** Must be worn at all times
- **No smoking.** Pallas Foods already have a no smoking policy within its sites and vehicles. However this is now law as well. A Pallas Foods vehicle is considered a 'work place' and as such has a no smoking sign displayed. Failure to comply could lead to fines. Pallas Foods will also take disciplinary action against drivers and / or porters who fail to comply

Non transport/delivery employees are regularly required to drive to various work locations on the island of Ireland, which may involve driving for a significant portion of a day. Employees must plan such trips with their management in accordance with the company policy on travel and entertainment which specifies employee safety. Company events must be managed to take travel time into account. Managers must arrange driving hazard awareness training with the group fleet manager for the relevant employees who will provide guidance on regulatory working time requirements.

4.4.6.2 Safe Access and Egress

A swipe card or fob system is in operation at the 303 Newcastle West site to control access throughout the site, in particular the higher risk operational areas. Employees, contractors and visitors will be allocated swipe cards which restricts their access specific to their work. This greatly reduces the interaction between staff / visitors and equipment.

Employees (non-maintenance), contractors (unauthorised) and visitors are strictly forbidden from entering the Pallas Foods Restricted Access Areas – Maintenance Workshop, Waste Water Treatment Plant, the roof, sub level treated effluent tank, the water storage tanks, the water pump control room, the attic/void spaces.

A meeting with the Maintenance Manager is required for any query related. Ref company procedure EHS-016 Permit to Work – Restricted access / Confined space areas.

Visitors must report to reception and sign in at visitor's book, point of contact is responsible for the visitor while on site and must make evacuation procedure known to them on arrival.

In order to ensure that employees have a safe access and egress to and from their place of work at all times, the following controls will be maintained while working on company premises:

- Pallas Foods materials and equipment storage will not obstruct any fire or safety appliance, firefighting equipment or emergency exits on the company premises where work is being conducted.

The following shall be maintained:

- Good housekeeping standards will be maintained at all times and all tools and equipment will be stored away safely. Particular focus is placed on warehousing, especially the Butchery, general storage of chemicals, products and materials, Maintenance workshop and Battery charging areas. A high standard of housekeeping must be maintained in all areas, including depots and vehicles.
- Access routes and aisle ways will be marked on all floors where work is being conducted and will be kept clear of all stored materials at all times.
- Segregate plant and pedestrian where possible and practical.
- Cables and other trip hazards will not be run across work areas and spills will be cleaned up immediately.
- Adequate lighting will be provided during the winter months where employees are working to allow for safe access and egress if required.

- Traffic routes in and out of Pallas Foods are kept clear and that parked vehicles do not obstruct free flow of traffic.
- The warehouse and yard are strictly official business only areas.

4.4.6.3 Chilled/Frozen Warehouses and Food Safety

Work in Food Storage and Loading areas:

Legislation for food hygiene results in work at low temperatures at Pallas Foods. This applies to both the freezer and chill warehouses. Pallas Foods is committed to minimising such exposures as far as reasonably practicable. The nature of work in the Butchery requires the use of hands for food preparation and handling and thus the temperature in the Butchery is controlled at approximately 9 degrees C. The chill warehouse in general is at a temperature of 5 degrees C and the freezer warehouse is at -18 degrees C. The Health and Safety Authority Guide to the Safety, Health and Welfare at Work (General Application) Regulations 2007, Chapter 1 of Part 2: Workplace states that the employer must conduct a risk assessment to determine what is necessary for employee protection. Issues for consideration include degree of exposure, task rotation, local heating, heated rest facilities, insulation from cold surfaces, personal protective clothing and equipment. Pallas Foods provides heated canteen and rest room facilities. Personal protective clothing is provided and worn by exposed employees. Gloves are provided for handling of cold/frozen goods. The majority of warehouse activity is in the chill, then ambient temperature and lastly the freezer section of the warehouse.

Food Safety

Pallas Foods receives stores and delivers cooked and uncooked food to customers. It operates a demonstration kitchen in the Dublin premises. Demonstration kitchen and food preparation staff (in particular Butchery personnel) will continually apply the training received to ensure that all persons handling raw foodstuffs or preparing food on the premises will not be adversely affected.

Pallas Foods has implemented and maintains the international food safety standard, ISO 22000:2005 to ensure the control and continuous improvement of its food and drink management processes. Food is occasionally prepared and served at off site catering events.

Food Preparation Areas

- All food preparation and serving surfaces should be smooth, impervious and capable of easy cleaning
- All other parts of the areas must be capable of easy and frequent cleaning
- Wood is not recommended but where unavoidable must be smooth and finished with an easily cleanable surface
- All equipment must be capable of easy and frequent cleaning
- Any surface coming into contact with food must be capable of being sanitised

Related documents:

- ISO 22000 Food Safety Management System

4.4.6.4 Welfare Facilities

The provision of welfare facilities required by legislation will be provided in accordance with the *Safety, Health and Welfare at Work (General Application) Regulations, 2007, Part 2 Workplace and Work Equipment, Chapter 1 - Workplace and Amendment Regulations 2007*

Employees are reminded that any person who is under medical supervision, or on prescribed medication and who has been certified fit for work, should notify the manager or supervisor of any known side effects or temporary physical disabilities, which could hinder their work performance and which may be a danger to either themselves or their fellow workers. Management will arrange to assign appropriate tasks for that person to carry out in the interim.

Employees must complete a medical questionnaire as part of their manual handling training. This confidential information will be maintained by HR.

The following personal hygiene and general welfare facilities are provided where necessary.

- First aid boxes are located in each area with the names of the first aiders in those areas.
- There is also a dedicated first aid facility at the Dublin depot.
- When interacting with hazardous materials or in potentially dirty areas, staff will wash their hands before eating, drinking, smoking or leaving the site.
- A dining area is provided in the Dublin depot for employee breaks.

The *Safety, Health & Welfare at Work Act, 2005*: requires all employers to provide safe places of work and safe systems of work. This covers the management of staff such that they are not incapacitated by drugs or alcohol consumption to carry out their work without risk to others. The Road Traffic Act also renders it a criminal offence for a driver to be unfit through drugs and/or alcohol. Pallas Foods is committed to assisting with the welfare of its employees, including those who may have a chronic alcohol or drug problem, in so far as it is reasonably practicable.

The following rules apply:

- Illicit drugs and alcohol - employees are not allowed to attend their workplace to carry out duties whilst under the influence of illicit drugs or alcohol. Any person found breaking this rule will be subject to disciplinary procedures.
- Any employee who in the opinion of Management shows apparent signs of the effects of intoxicating liquor or drugs will be required to leave the Company premises immediately. The employee will be requested to relinquish the keys to their vehicle and transport will be arranged for them.

- At least one member of management will accompany the employee to attend the local company nominated medical doctor for a drug & alcohol test.
- The employee will forfeit payment for the remainder of the shift / day.

4.4.6.5 Installation, maintenance and use of storage racking

Warehouse racking is in use at the Dublin depot for the storage of products. Racking is designed to allow the safe, secure and efficient storage and retrieval of materials on site. 4.4.6.2 Access and egress, 4.4.6.7 Manual handling, 4.4.6.8 On site vehicles and equipment and 4.4.6.6/4.4.6.10 Chemical information and management and 4.4.6.11 Work at height, are also relevant to the use of racking and storage areas.

Racking poses risks of collapse or falling materials if incorrectly installed, maintained or used. The following controls have been implemented at Pallas Foods:

- Racking installed and maintained to BS EN 15512:2009 “Steel static storage systems. Adjustable pallet racking systems. Principles for structural design” and BS EN 15620:2008 “Steel static storage systems. Adjustable pallet racking. Tolerances, deformations and clearances.
- Trained and experienced maintenance personnel erect and maintain racking.
- Annual inspection & certification by competent approved consultants who advise of safe working loads and provide signage.
- Inspection by management. Reporting and corrective action for any incidents or damage.
- Pallets checked by Replenishers prior to placement in racking.
- Suppliers instructed by purchasing regarding pallet requirements.
- Forklift drivers trained to the required standard and experienced in loading and unloading racking.

- Areas where walkways go under storage locations are provided with the following protections to protect employees: No heavy items permitted on these locations; Additional support provided by meshing under the product location.
- Any damage to racking is to be notified to supervisors immediately and corrective action taken.

4.4.6.6 Information on Chemical Substances

All employees receive induction training which includes chemical safety awareness. Delivery drivers receive specific training related to the safe storage and handling of chemical products supplied to customers. Safety data sheets are available for all such products on the company server in the K:\Shared\Quality Assurance\SDS Sheets folder.

Chemical substances and materials used in Pallas Foods are supplied in marked containers. The manufacturers or suppliers must show clearly the hazards, if any, of the contents of the container and must supply a Safety Data Sheet (SDS) for the product.

Employees are encouraged to read the container labeling, become familiar with the hazards of the chemical, if any, and refer any queries to their supervisor, manager or the EHS Officer, Reuben McManus, who will advise them.

As a further safeguard, and to ensure that employees have full information on the potential hazards of working with any of the chemical substances used on site, the appropriate manager and/or the EHS officer, Reuben McManus, will obtain and file Safety Data Sheets describing the composition and hazards of all the chemicals used.

Any employee who requires information on any of the substances in use in Pallas Foods can review copies of the relevant SDS by requesting through their Supervisor / Manager.

Related documents:

- **Safety Data Sheets**
- **Chemical Risk Assessments**

4.4.6.7 Manual Handling

All Pallas Foods employees are trained in safe manual handling techniques. Mechanical equipment will be used to reduce the level of manual handling on site by Pallas Foods employees where possible.

- Pallas Foods employees will not attempt to lift loads beyond their physical capacity.
- Avoid sudden and awkward movements while lifting.
- Check for rough surfaces, sharp or jagged edges, splinters etc. and use the appropriate protective clothing at all times.
- Do not allow the object being lifted impede your line of vision.
- Avoid slippery or other unsafe surfaces.
- All lifting will be carried out using the 8 principles of lifting:
 - Size up the load, make certain of good balance
 - Keep the back as straight as possible, tuck in the chin
 - Use the strong leg muscles rather than weaker back muscles
 - Carry the load close to the body
 - Watch where you are going
 - Make sure the hands and feet are clear in placing loads
 - Always ask for help when needed
 - Use mechanical equipment where possible

Manual Handling

Regulation 68 of the Safety, Health and Welfare at Work, (General Application) Regulations 2007 defines manual handling of loads as the following:

“Any transporting or supporting of a load by one or more employees, and includes lifting, putting down, pushing, pulling, carrying or moving a load, which by reason of its characteristics or of unfavourable ergonomic conditions, involves risk, particularly of back injury, to employees.”

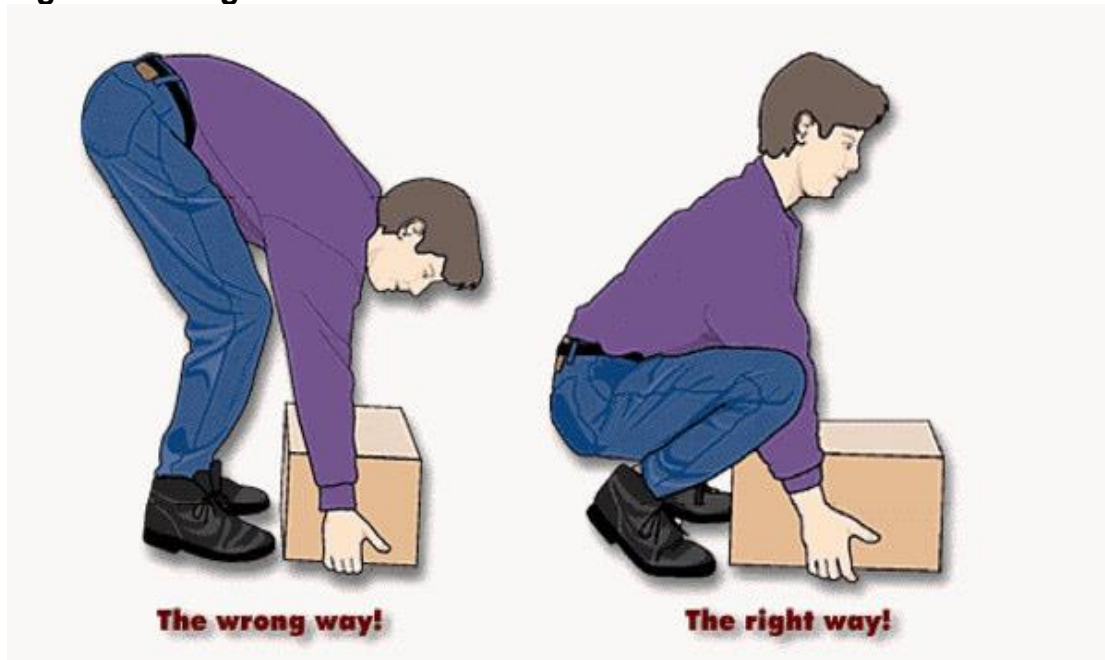
Pallas Foods will comply with the regulations of the Safety, Health and Welfare at Work, (General Application) Regulations 2007, Chapter, 4 regarding manual handling. To this end Pallas Foods will utilize the following methods of dealing with risks from manual handling:

- Take appropriate measures / means to avoid the need for manual handling of loads by Pallas Foods employees as is reasonably practicable.
- As it is not possible to completely eliminate the need for manual handling in the workplace appropriate means / measures will be provided to reduce the level of risk from manual handling activities e.g. use of trolleys to move product, MHE's and pull sticks etc.
- Workstations and work areas will be organized as much as possible to make handling as safe as possible.
- Where possible, we will provide employees with information regarding the weight of the load and the centre of gravity of the load.

To prioritise risk assessment process, vulnerable persons in terms of back injury will have a manual handling risk assessment completed in association with a competent person once they inform Pallas Foods of the vulnerability to back injury from manual handling. The following good practice should be adhered to for movement of trolleys.

- Avoid manoeuvring a fully loaded trolley on carpeting, uneven surfaces, ramps or where differences in floor level exist.
- Ensure that the trolley is well maintained with wheels that run smoothly.
- Push rather than pull trolleys.
- Control the cart from the low side when going up or down a slope. Employees should enlist the help of another worker whenever necessary.
- When pulling a trolley keep feet well away from the load and go no faster than walking speed
- Ensure that handle heights are between the shoulder and waist.
- Do not load in a manner that obstructs the operator's vision.
- The following good practice should be followed for the lifting of loads
(Refer to Figure 2 also)
- Plan the lift: Use handling aids or the help of another person if necessary. Remove obstructions. For a long lift, consider resting the load halfway on a table or bench.
- Keep the load close to the body and ensure a good hold.
- Ensure that a stable position is adopted with feet apart and one leg slightly forward to maintain balance.
- Ensure good posture at the start of the lift.
- When lifting, avoid flexing the back any further.
- Avoid twisting the back or leaning sideways.
- Ensure that the head is up when lifting.
- Avoid jerking or snatching, move smoothly.
- If possible put load down and slide it into position.

Figure 2 Lifting Practices



All Pallas Foods employees who are involved in manual handling will receive manual handling training as part of the induction process and refresher manual handling training every 3 years as a minimum. The process of manual handling risk assessments will be carried out on a prioritized basis.

Due to the significant amount of manual handling activity at Pallas Foods we maintain a policy on prevention and management of manual handling related injuries. Employee training in safe manual handling techniques and the use of mechanical equipment specific to Pallas Foods will be used to control and reduce the level of manual handling by Pallas Foods employees where practical.

- The manual handling module is specific to Pallas Foods works.
- Training will communicate the principals of safe lifting and employees will be capable of implementing these in all manual handling scenarios after individually assessing the requirement.

- Pallas Foods employees will not attempt to lift loads beyond their physical capacity.
- Pallas foods max weight policy of 25kg for manual handling.
- All lifting will be carried out using the 8 principles of lifting:
 - Assess the load – Task, individual, Load, Environment
 - Broad stable base, feet flat on the floor
 - Bend the knees, Use the strong leg muscles rather than weaker back muscles
 - Back in good alignment
 - Firm palmer grip
 - Arms in line with the trunk
 - Keep the load close to the bodies centre of gravity
 - Turn feet in direction of travel.

4.4.6.8 On Site Vehicles, Tools and Equipment

Pallas Foods uses hand pallet trucks, PPT's (powered pallet trucks), LLOP's (long legged Order Pickers), FLT's (Fork lift trucks), Reach trucks, MEWP's (Mobile Elevated Working Platforms), floor cleaning equipment and other vehicles and equipment at the Dublin Depot. Hand pallet trucks and hand carts are also used. Powered pallet trucks are favoured over Fork Lift or Reach trucks. All such equipment is maintained by an external competent contractor. Battery charging is conducted on site and related equipment is also maintained by a contractor.

Pallas Foods have installed a swipe card system to all operational areas. Employees have been allocated swipe cards which restrict them to the area they work. This greatly reduces the interaction between staff / visitors and equipment. Traffic in these areas are organised in such a way that vehicular travel operates in a one directional way whilst in aisles. Non-operational personnel and visitors are not to enter the warehouse and deliveries yard areas. Traffic routes for vehicular are provided; the traffic route is wide enough to enable any vehicle likely to use that route to pass the pedestrian safely.

The loading bays are clearly defined by the use of barriers and painted parking zones. Traffic routes for vehicular routes are provided; the traffic route is wide enough to enable any vehicle likely to use that route to pass the pedestrian safely.

The loading docks are fitted with an interlocked wheel lock system to prevent a vehicle pulling away at work and whilst warehouse staff are working in the trailer.

Vehicle movement in the warehouse (MHE's) is controlled by a safe system of work, which all operators receive training on.

- Only trained personnel permitted to use forklift trucks
- No passengers allowed on forklift trucks
- Right of way system in place
- One way system between racks – no entry permitted between aisles except in the event of a priority issue e.g. spillage which required immediate attention
- Training for all new personnel on right of way system and refresher training provided to existing staff at regular intervals
- Only trained personnel permitted to operate ride on floor sweeper and washer/driers

Operational areas are defined throughout with the aid of Health and Safety signage .When drivers are entering and exiting shutter doors, aisles they must slow down and sound the horn. If an area is deemed unsafe by the operatives to operate the equipment safely they must come to a stop and sound the forklift horn, ensuring the area is clear of pedestrians.

There is a speed limit of 10kph imposed throughout the premises

Operational controls for Powered Pallet Trucks and Fork Lift Trucks include:

- Trained and competent drivers.
- Regular monitoring and supervision of driver performance.

- Medical questionnaire completed by drivers upon hire and periodically thereafter.
- P.M. (Preventative maintenance) programme implemented for vehicles.
- Statutory inspections completed as required by the Safety, Health and Welfare at Work (General Application) Regulations 2007 Part 2 Workplace and Work Equipment, Chapter 2 - Use of Work Equipment and Amendment Regulations 2007.
- Pre-use checks are conducted by user and safety observations by management.
- Drivers trained to avoid distractions and focus on direction of travel.
- All employees and other personnel in warehousing areas must wear high visibility clothing and Pallas Foods approved footwear.
- Keys removed from vehicles when not in use.
- Housekeeping to be maintained at all times – clean as you go policy.
- Aisles kept free of hazards and blockages.
- Driving with forks to the rear.

Other machinery and equipment used on site include vehicle lifting equipment, truck wash in the VMF (vehicle maintenance facility), warehouse mini-load (three enclosed and safety interlocked “auto” storage machines that are manually loaded with items on a small tray. The system will then automatically generate a location within the enclosed guarded storage slots based on how often the items are called for) storage.

Other equipment includes refrigeration plant, electrical plant, electricity generator, balers, compacters, pallet wrapper, dock levellers, bay doors, butchery equipment and demonstration kitchen equipment. Risk assessments and operating procedures to be documented as appropriate. Machinery is CE marked, installed and maintained as appropriate. Safety features including interlocks and guards where required.

The Maintenance Department manage the servicing, maintenance and repair of plant machinery and equipment and ensure that statutory inspections are conducted as applicable. An external contractor manages the VMF machinery and equipment.

All tools and equipment used by Pallas Foods employees are maintained in good condition and only operated by trained and competent employees. Maintenance tools include electrical portable drill and hand tools. Weighing, cutting and packaging machines as well as hand knives are used in the Butchery/food processing area. Equipment and machinery controls include:

- Safe System of Work documented for use of loading bay doors and dock levellers.
- Clear instructions at the point of use for warehouse equipment.
- No items of equipment or machinery will be operated without suitable guards.
- All portable electric tools will be disconnected when not in use.
- Power tools will not be used for applications other than those specified in the operating instructions of the power tool.
- All portable power tools will be maintained in good working condition and inspected on a regular basis.
- All operators of portable power tools will operate them at a rate for which they are intended, no power tool will be operated under excessive force for which it was never intended.
- No power tools will be modified, have guards removed or be used, except in a manner that complies with the manufactures instructions.
- Power cords on all portable equipment will be checked on a regular basis and every effort will be made to avoid contact with heat, oil and sharp edges as part of PAT requirements.
- All portable tools will be operated at the reduced rate voltage (110v)

Related documents:

- Risk Assessments
- Equipment Manuals.

4.4.6.9 Electrical Safety

All electrical work carried out on Pallas Foods property will be completed by a qualified and experienced electrician or contractor, and in compliance with I.E.E. Regulations and the Electro-Technical Council of Ireland.

When working with electrical equipment, i.e. Control panels, Motors etc., isolation must be achieved, locking off where appropriate.

- Where it is not possible to or practical to isolate the system, a second person will be in attendance to act as a watchman, to prevent accidental use while work is in progress.
- Unused or redundant cables should be identified and terminated in suitable enclosures at both ends.
- When isolating electrical equipment always ensure the following:
 - The correct identification of equipment does not depend on labels/tags as they are not always correct.
 - Remove mains and control circuit fuses or switch off circuit breakers.
 - Lock isolator, circuit breaker or any other type of isolation device in the off position at both source and field.
 - Attach appropriate labels to isolated equipment (lockout/danger tags).
 - Always double check that equipment is totally isolated with volt meter at both source and field.
 - Never rely on automatic isolation systems such as photocells interlocks etc. for isolation, isolation should be physical not automatic.
 - Live electrical equipment must always be protected by appropriate doors, panel covers or other devices- live equipment must never be left unattended while exposed.

- A Permit to Work system will be in operation for work on electrical equipment. Higher risk equipment PAT annually.

Related documents:

- EHS-04 Control of Hazardous Energies

4.4.6.10 Chemical Controls

A hazardous substance is described as any substance with the potential to cause harm, injury or damage to a person's health. In most working environments, we are exposed to hazardous substances, however this can be done safely if used in a controlled manner and circumstances.

The following control measures are put into place in all circumstances where hazardous substances are in use:

- Awareness training communicated to the relevant staff
- Specific hazardous chemical and transport of chemical training for delivery drivers
- All goods supplied must have a corresponding Safety Data Sheet (SDS) maintained on the Quality Assurance folder of the server.
- Substances used by the maintenance and hygiene departments require extra attention and awareness training for the relevant staff
- All safety controls advised, such as the use of PPE or spill control procedures, must be obeyed;
- Suppliers of hazardous substances are obliged to provide an SDS for each substance – where one has not been received it should be possible to request an SDS for an existing substance;
- Any emergency response procedures – such as spill control are addressed and practiced as necessary. Spill kits are available in each delivery vehicle.
- Pallas Foods employees will be aware of the inherent hazards associated with any hazardous materials brought into the business.

- Suitable personal protective equipment applicable to the hazardous material will be supplied and worn by our staff when handling at all times.
- Pallas Foods employees will make themselves aware of any hazardous materials used on the premises. This is included in the chemical awareness training at induction.
- There is no Asbestos present at the Dublin depot..
- All hazardous materials brought on site will be stored in suitable chemical containers.
- All chemical containers will be fitted with an appropriate label providing the necessary information and symbol on the hazardous material.
- A safety data sheet will be available on site for every hazardous material.

Related documents:

- Safety Data Sheets
- Chemical Risk Assessments
- EHS-016 Chemical Control procedure

4.4.6.11 Working at Height

All work from heights will be carried out in accordance with the requirements of *Safety, Health and Welfare (General Applications) 2007 Part 4 Work at Height and Amendment Regulations 2007*.

Work at height at Pallas Foods will generally be implemented through the use of a Mobile Elevated Work Platform where a more permanent scaffold or structure is not practicable. Only personnel trained and qualified to operate MEWPs are permitted to do so. Trained personnel must use appropriate safeguards, including safety harness and lanyard attached to the MEWP structure, hi-visibility clothing, safety footwear and other PPE as required by the specific task. Work conducted externally using a MEWP also requires the use of a hard hat.

Work from ladders will only be conducted on the basis that the work has demonstrated that the use of ladders is suitable for the work being performed because of the low risk and –

- Short duration of use,
- Existing features on site that he or she cannot alter.

This assessment is in accordance with the requirements of Part 4 of the *Safety, Health and Welfare (General Applications) Regulations 2007*, and in particular Section 95.

Ensure that the ladder is in good condition and is positioned securely against a solid structure at a safe angle (approximately 75 degrees with the horizontal).

- Clean any mud or greasy substances from your footwear before climbing the ladder.
- Securely lash the top of the ladder to the structure to prevent movement, before commencing work.
- Always face the ladder and use both hands when climbing or descending. Three out of the four body contacts should be in contact with the ladder when climbing or descending. Carry your tools in special pockets or a shoulder bag, or raise and lower them with a hoist/rope.
- Always work facing the ladder and hold on with one hand. If both hands are required for working, use a safety belt.
- It is dangerous to reach out too far in any direction from a ladder. If necessary, move the ladder across.
- Only one person is allowed on a ladder at any one time.
- Never work above the second top rung of a ladder. Do not straddle a ladder.
- **DO NOT** use metal ladders or wire reinforced wooden ladders near electrical wires, circuits, fixtures or power lines.

- If necessary, have an assistant hold the bottom of the ladder to prevent movement and to warn any personnel and drivers of vehicles in the area.
- A safety harness and lanyard shall be used at all times while carrying out work at height from an MEWP, or other non-permanent structure.

4.4.6.12 Policy on Preventing and Dealing With Bullying / Harassment at Work.

Pallas Foods is committed to providing all of its employees with an environment free from bullying and harassment. All employees must be treated with dignity and respect at work. All employees will be expected to comply with this policy and management will take appropriate measures to ensure as far as possible that bullying/harassment does not occur. Appropriate disciplinary action, including dismissal, will be taken against any employee who violates this policy including the making of a vexatious complaint of bullying.

Pallas Foods will strive to handle complaints in a manner which is fair and sensitive to the parties involved. In so far as practicable, confidentiality will be maintained. An employee will not be victimized for making a complaint of bullying.

The policy applies to employees both in the workplace and at work associated events such as meetings, conferences and work related social events, whether on the premises or off site.

The policy applies to bullying/harassment not only by fellow employees but also by a client, customer or other business contact to which an employee might reasonably expect to come into contact with in the course of their employment. Bullying from external sources (for example in a telesales situation or on a delivery to a client) must be reported to the supervisor or manager of the person being bullied. Management must take appropriate action to address such issues.

DEFINITION OF BULLYING

Workplace bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment which could reasonably be regarded as undermining the individual's right to dignity at work. An isolated incident of the behaviour described in this definition may be an affront to dignity at work but as a once off incident is not considered to be bullying.

Bullying includes conduct offensive to a reasonable person, e.g. oral or written slurs, physical contact, gestures, jokes, displaying pictures, flags/emblems, graffiti or other material or conduct which threatens or intimidates.

Other examples of bullying behaviour include patterns or repeated incidences of:

- Personal insults and name calling
- Persistent unjustified criticism and sarcasm
- Inappropriate communication with other employees including shouting
- Unfair delegation of duties and responsibilities
- Setting unreasonable deadlines
- Unnecessary work interference
- Making it unnecessarily difficult for staff to have access to necessary information
- Excessive and unjustified monitoring of work
- Aggression
- Continuously refusing reasonable requests without good reasons
- Intimidation and threats in general.

Reasonable and necessary performance management is not bullying.

DEFINITION OF HARASSMENT

Harassment means any unwanted conduct related to the employee's age, gender, sexual orientation, religion (or absence of religious belief), race, colour, nationality or ethnic or national origins, disability, marital status, family status or membership of the traveller community which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

In either case, the unwanted conduct may consist of acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material.

Examples of harassment include:

- Jokes
- Comments
- Physical harassment
- Visual displays
- Isolation
- Pressure to behave in a manner which the employee believes to be inappropriate by reference to one of the discriminatory characteristics.

Harassment may be verbal or written

Examples of sexual harassment include:

- Sexual gestures
- Displaying sexually suggestive objects, pictures, calendars
- Sending, displaying or creating inappropriate correspondence including faxes, text messages or e-mails
- Unwelcome sexual comments and jokes

- Unwelcome physical conduct such as pinching, unnecessary touching, etc.
- Inappropriate or repeated unwelcome requests for social contact;

Sexual Harassment may be verbal or written

The above examples are indicative of the type of conduct which is considered to be bullying or harassment by Pallas Foods and the above list is not exhaustive. Each case will be decided on its own facts and circumstances.

COMPLAINTS PROCEDURE

There is both an informal and formal procedure to deal with the issue of bullying/harassment at work. For practical purposes it is important to make the complaint as soon as possible after the incident. Any investigation will be completed as quickly as possible. Pallas Foods is committed to ensuring a fair, impartial, confidential and prompt investigation of complaints.

The nature of a complaint may depending on the circumstances require a tailored approach to investigation and decision making. Pallas Foods therefore reserves the right to decide in each particular circumstance on the appropriate investigative person or personnel, the decision maker, the timescale, the manner of the investigation of the complaint, the decision making, the appeal and any post complaint action. Any such deviation shall not be a breach of this policy or invalidate any decision made providing such deviation is not material and does not impact on the rights of the employee or essential fairness of the policy.

Informal Procedure

Complaints of bullying or harassment can be dealt with informally where possible. An employee who is the recipient of unwanted conduct should in the first instance ask the perpetrator to stop immediately. It may be the case that the perpetrator does not realize that the conduct is unwelcome and this may resolve the matter.

It is important that unwanted actions are not allowed to continue; therefore an employee should make it known to the perpetrator at an early stage that the conduct is unwelcome.

The informal approach may produce solutions that are speedy and effective. If a person finds it difficult to approach the alleged perpetrator directly then a person should seek assistance from:

A work colleague; or A manager; or A member of human resources (if appropriate in the circumstances) who will be a contact person on a confidential basis with a view to approaching the alleged perpetrator.

In this situation the approach of the contact person should be by way of a confidential, non-confrontational discussion with a view to resolving the issue in an informal low-key manner. A complainant may decide, for whatever reason, to bypass the informal procedure. Choosing not to use the informal procedure will not reflect negatively on a complainant in the formal procedure.

[Alternatively, the employee can refer the matter to the Ombudsperson who will decide on the most appropriate action.]

It is recognised that it may not always be practical to use the informal procedure particularly where the bullying or harassment is serious or where the people involved are at different levels in the organisation. In such instances the employee should use the formal mechanism set out below.

Formal Procedure

The first step in making a formal complaint is to refer the matter in writing to the employee's HR Manager as soon as possible. The complainant should be identifiable.

Pallas Foods cannot resolve anonymous complaints. All complaints received will be treated seriously, confidentially and dealt with as soon as is practicable. The alleged perpetrator will then be notified of the nature of the complaint as soon as practicable.

After reviewing the initial complaint and after making the initial notification to the alleged perpetrator, Pallas Foods will then issue a proposed timescale in relation to the investigation. Pallas Foods will also notify the parties who the investigator or investigators (if there is more than one) is/are, who the decision maker is and to whom an appeal will lie. The investigator(s), the decision maker and the person to whom an appeal will lie will be members of management who are the appropriate persons in the opinion of Pallas Foods in the circumstances.

The complainant must be prepared to give full details of the complaint and the complainant will be interviewed in relation to the complaint. The perpetrator will be given a full opportunity to respond to the allegations. The complainant may be accompanied by another employee to any meeting in which he/she is being interviewed. The alleged perpetrator may be accompanied by another employee to any meeting in which he/she is being interviewed.

If it becomes apparent during the investigation that other witnesses need to be interviewed, they will be interviewed and witness statements will be taken. Any employee who is interviewed as a witness has a duty to co-operate in the investigation, to deal honestly and to respect the confidentiality of the investigation.

Witness statements can play an important role in the investigation and determination of a complaint. Statements given by witnesses will be circulated to the complainant and the alleged perpetrator for their comments.

When the investigation has been completed in the opinion of the investigator(s), both the complainant and the alleged perpetrator will be given a copy of the investigator's findings arising out of the investigation. Both parties will be given the opportunity to submit their comments in writing to the investigator on the investigator's findings.

After the comments have been submitted, the investigator will pass the findings and the comments on the findings to the decision maker. The role of the decision maker is to decide what action Pallas Foods will take. The decision maker will decide within a reasonable period, such period to be decided by Pallas Foods, what action, if any, needs to be taken. Both parties will be informed of the decision maker's decision within a reasonable period.

Both parties will have the right to appeal the decision of the decision maker within a reasonable period. Pallas Foods will notify the parties of the person to whom the appeal should be directed and the procedure for appealing.

Action Post Investigation

Where a complaint is upheld a disciplinary hearing will take place. The disciplinary action to be taken will be in line with the company's disciplinary policy. Should a case of bullying/harassment be proven then appropriate disciplinary action will be taken.

This can include a warning, transfer, demotion or other appropriate action up to and including dismissal. Records of any warnings for bullying/harassment will remain in the employee's file and will be used in determining disciplinary action to be taken if any further offences of the same or similar nature occur in the future.

Integrity of this Policy

Retaliation of any kind against an employee for complaining or taking part in an investigation concerning bullying/harassment at work is a serious disciplinary offence. Any employee who feels that he/she has been victimized should refer the matter immediately to their Human Resources Manager.

Malicious Complaints

If a complaint is found to be malicious, then the appropriate disciplinary action up to and including dismissal will be imposed.

Further Information

All questions relating to the execution or interpretation of this policy should be referred to Human Resources

4.4.6.13 Pallas Foods Workplace Violence Policy

I. Purpose and Objective

Pallas Foods is committed to providing a safe workplace for all employees, customers, suppliers, vendors, and guests. Accordingly, threats and acts of violence in the workplace will not be tolerated, and will be quickly investigated and addressed when they occur. This Policy applies to acts of violence, threats or other conduct that occur on Company Premises, occur during the course of Company business, occur through the use of Company property, and/or affect Pallas Foods's business interests. This Work Place Policy achieves these goals by:

- A.** Establishing an effective process for identifying, preventing and handling threats or violence in the workplace;
- B.** Creating awareness of actions that can reduce the likelihood of threats that escalate into violent behaviour; and
- C.** Creating accountability and responsibility for these actions

II. Definitions

Protected Persons: These guidelines are designed to cover employees, visitors, customers, vendors, contractors, and other people assigned to work on Company Premises, as well as people engaging in Pallas Foods business off-site.

Company Premises: Company Premises includes any property that Pallas Foods owns, leases or otherwise controls or occupies, including parking lots.

Workplace Violence: Workplace violence is defined as any conduct on Company premises; while conducting company business; or while otherwise representing the Company, that is intended to cause physical harm to a person or property or otherwise intended to have a negative impact on the safety and/or security interests of the Company.

Threat: A threat is any action taken or intent communicated to another individual that would arouse fear, hostility, intimidation or the apprehension of harm in another person for his/her personal safety, or for the safety of his/her family, friends, co-workers, clients, employer or property. A threat can be communicated in writing, verbally, or by gesture, or by any combination thereof. If sufficiently egregious, a threat can constitute a criminal act. Examples of threats include menacing gestures, flashing of a concealed weapon, stalking, or statements of dire consequences if certain actions are or are not taken.

Examples of Prohibited Conduct:

The following are examples of conduct that constitute prohibited, violent or threatening behaviour:

- Fighting or engaging in any violent or threatening physical contact (e.g. hitting, punching, slapping, shoving, kicking, biting, etc.);
- Stalking, harassing, threatening or intimidating others with violence;
- Unauthorized possession or use of firearms, ammunition, explosives, knives, caustic chemicals or other weapons, or use of any tool or other object as a weapon; bringing a weapon, including a concealed weapon, onto Company Premises whether in a personal vehicle or otherwise, and whether or not a license or permit to carry such a weapon has been obtained;
- Engaging in arson, vandalism, acts of sabotage, or other activity which causes damage to the property of Pallas Foods;
- Promoting violence or threats as an appropriate manner in which to solve workplace disputes;

- Engaging in any action outside of work which reasonably has an adverse impact on the safety and security of other employees, the workplace or the Company's interests
- Any other act(s) which a reasonable person would consider as inappropriate and/or posing a danger or threat of danger/violence in the workplace. Such behaviour includes, but is not limited to, oral, written or email statements, gestures or expressions that communicate a direct or indirect threat of physical harm;
- Making offensive comments regarding violent events and/or behaviours.

III. Responsibilities

Employee:

Each employee is responsible for

- Maintaining a safe working environment;
- Abiding by these Guidelines
- Promptly reporting any threat or act of violence in the workplace in accordance with the process outlined by the Company when the employee
- Witnesses or is aware of an act of workplace violence;
- Witnesses or is aware of a threat of violence or intimidating conduct in the workplace, or
- Believes in good faith that an employee or others on site may commit workplace violence or threats or may become a victim of workplace violence or threats; and
- Cooperating in the Company's investigation of threats or acts of violence in the workplace.
- Supervisors/Managers:
- Supervisors and Managers are responsible for:
- Reporting all incidents of violence or threats in the workplace to the security manager.

- Assessing the need for additional training of employees in (i) understanding potential warning signs that an employee may become violent in the workplace, and (ii) conflict resolution; and
- In conjunction with HR, determining and implementing, where appropriate, disciplinary actions.

IV. Confidentiality and No Retaliation

Confidentiality will be maintained to the extent practicable any time information is given concerning threats or acts of violence in the workplace. Information will be shared only on a “need to know” basis. In addition, retaliation against anyone reporting threats or acts of violence is strictly prohibited.

V. Discipline

Any employee who commits acts of violence, engages in threats or other intimidating conduct, or otherwise engages in prohibited conduct as stated in these Guidelines will be subject to discipline up to and including dismissal.

4.4.6.14 Pregnant Employees

The company adheres to all the provisions of the *Safety, Health and Welfare at Work (General Application) Regulations, 2007, Part 6 Sensitive Risk Groups, Chapter 2 – Protection of Pregnant, Post Natal and Breastfeeding Employees and Amendment Regulations 2007* and all leave entitlements adhere to the *Maternity Protection Acts 1994 and 2004*, as outlined in the Pallas Foods Leave Policy.

These regulations apply to employees that are pregnant, have just had a baby or are breast-feeding (within the first 26 weeks after birth). If Management is notified of any of the above, a risk assessment of any hazardous activities relating to the employee will be carried out. The following hazards must be considered:

- Physical shocks, including direct blows to the abdomen.
- Handling a load.

- Movement and postures, which are abrupt or severe, or give, rise to excessive fatigue.
- Non-ionising radiation.
- Chemicals: (In particular any chemical which is harmful by inhalation or when absorbed through the skin, i.e. organic solvents).

A pregnant employee must not be exposed to these hazards unless they are adequately controlled. Adequate control means:

- The hazard is reduced to a level, which will not harm the pregnant woman or the developing child or breast-fed child.
- If any of these risks are present they must either be eliminated or safeguards put in place to protect the employee's health and safety.

These safeguards include:

- Changing the type of work, working hours, etc.
- Moving the employee to other safe work.
- Allowing pregnant employees to use the visitor parking area during adverse weather conditions.

If these safeguards are not possible then the employee must be granted safety and health leave. This is leave which is paid for by the employer for a period of 21 days. If the Health and Safety leave extends beyond 21 days the woman may be entitled to a social welfare benefit, subject to her P.R.S.I. contributions.

Pregnant women and nursing mothers will have the facility of a rest area if necessary.

4.4.6.15 Employee Return & Rehabilitation to Work Policy

Following an absence from work relating to a moderate or serious illness / injury, it is generally accepted as good practice to implement a plan for the employee returning to work on a phased or modified basis back to full normal duties. Pallas Foods is committed to the well-being and rehabilitation of all employees unable to perform their normal duties as a result of being injured on or off the job or recuperating from an illness. Management and Employee representatives in cooperation have developed an Injury Management Program, incorporating modified/alternate return to work duties, to meet this objective. This can be done in the following ways,

Phased Duty: Phased Duty is a normal duty assignment on a part time basis which is for a specified and limited period. It fulfils a necessary job function, appropriate to the Employee's skills and level of experience as determined by the Employer. The purpose being to aid with the rehabilitation of that person to return to full time work duties. Which the employee can perform without violating any medical restriction imposed as a result of a temporary Disability, Sickness or Injury.

For which the Employee is compensated at his or her normal rate of pay and benefits. Phased duty assignments are not a matter of right. The number, availability and duration of such assignments are limited by departmental needs as defined by the department head or designee.

Modified Duty: Modified Duty is a different to normal work assignment which is for a specified and limited period and fulfils a necessary job function. It will be appropriate to the employee's skills and level of experience as determined by the Employer. The purpose being to aid with the rehabilitation of that person to return to full normal work duties. Which the employee can perform without violating any medical restriction imposed as a result of a temporary disability, sickness or injury. For which the Employee is compensated at his or her normal rate of pay and benefits. Modified duty assignments are not a matter of right.

The number, availability and duration of such assignments are limited by departmental needs as defined by the department head or designee.

Circumstances require that-

- a) The employee's management can provide a plan of modified/phased duty work for a defined period in conjunction with EHS / HR.
- b) The "modified/phased duties" arrangement is understood as a temporary arrangement and defined short period, e.g. two to three weeks.
- c) A medical doctor has "signed off" on the modified/phased duties in the form of a report, letter or medical certificate.

The Employee Return & Rehabilitation to Work plan is individualised for each employee and is supported by medical documentation. This program provides for a timely job modification/placement to a temporary disabled employee who cannot perform regular duties as a consequence of an occupational or non-occupational injury/illness. It is Pallas Foods intent that this program will be compatible within current Irish statutory laws and collective agreements with any exceptions being mutually agreed to by both employees and management.

All employees who become injured/ disabled, regardless of cause, will be eligible and encouraged to participate in the program.

It should be recognised that this program does not cover all circumstances. It should also be noted that due to the highly physical nature of the job description of the majority of employees employed that transfer to alternative work may not be possible.

It is our intent to maintain and expand the cooperative efforts of management, employees and the Health and safety committee towards the awareness of accident and injury prevention. .

Any personal information received from or about the worker will be held in the strictest confidence. Information of a personal nature will be released only if required by law or with the approval of the worker, who will specify the nature of any information that may be released and to whom it can be released.

The program is:

- Voluntary
- Respectful of all employees
- Flexible
- Specifically designed for each employee's abilities
- Within the scope of the collective agreement(s)
- Individualised, with programs planned and documented with time lines
- Communicated and promoted through the company.

Safe and timely return to work recognises that while an employee cannot perform the full range of regular duties, meaningful, productive work can be performed.

4.4.6.16 Stress Policy

Pallas Foods adheres to all aspects of the *Safety, Health and Welfare at Work Act, 2005*, which obliges employers to identify and safeguard against **ALL** risks to health and safety, including stress.

Workplace stress arises when the demands of the job and the working environment on a person exceed their capacity to meet them.

Causes of stress in the workplace:

- Poorly organized shift work
- Faulty work organization
- Poor working relationships
- Poor communication at work

- Ill-defined work roles
- Highly demanding tasks
- The threat of violence

Safeguarding health and safety from the effects of stress is based on the same approach as that of any other hazard:

- Identification of potential problems
- Assessment of risks
- Implementation of safeguards
- Monitoring the effectiveness of safeguards.

Pallas Foods will utilise the following methods of managing stress:

- Ensure that employees are aware of the potential causes of stress and the early warning signs
- Ensure that all complaints that may be related to stress are listened to and appropriate measures taken.
- Where employers are aware that a workload or conditions of work are particularly stressful, measures should be taken to reduce the workload or improve conditions.
- Ensure employee supports are implemented, including policies and procedures to adequately support employees, including management, colleague supports and constructive feedback;
- Employees know how to access the required resources to do their job;
- Ensure that, as far as possible, the different job related requirements on employees are clear and compatible;
- Enable employees to raise concerns about any uncertainties or conflicts they have in their role and responsibilities.

- Ensure adequate employee consultation on changes which could affect their role or responsibilities, and provide opportunities for employees to influence proposals;
- Pallas Foods employee assistance scheme, which offers confidential and individual counselling and other advice to employees who may need it

4.4.6.17 Employee Assistance Programme

Pallas Foods provide a confidential 24 hour Employee Assistance Programme through our HR Department in conjunction with VHI. The program is confidential for concerns big or small; the EAP means personnel are able to access the help they need to cope with life's ups and downs. The programme is in line with the codes of practice outlined by the Irish Association of Counselling and Psychotherapy (IACP or other relevant clinical bodies)

4.4.6.18 Smoking Policy

Smoking and vaping is not allowed at the Dublin depot, not permitted in a company vehicle or at a customer site.

This policy is in accordance with *The Public Health (Tobacco) Acts, 2002 & 2004 – Section 47, Smoking Prohibitions*. No smoking is allowed in any enclosed area of the workplace

It is the objective of Pallas Foods to take as far as is reasonably practicable, all reasonable steps to safeguard the health, safety and welfare of all employees and to meet or exceed all relevant safety regulations and legislative requirements. In accordance with this objective Pallas Foods will protect all employees, contractors and visitors from the discomfort and health risks associated with passive smoking. Smoking anywhere indoor within the Pallas Foods Facility is not permitted under Irish law **ref** Smoking shall not be permitted in any enclosed area of the workplace as defined by *The Public Health (Tobacco) Acts, 2002 & 2004 – Section 47, Smoking Prohibitions*

NO SMOKING/VAPING signs are to be observed at all times.

4.4.6.19 First Aid

The provision of first aid equipment required by legislation will be provided in accordance with *the Safety, Health and Welfare at Work (General Application) Regulations 2007 Part 7 Safety Signs and First-Aid, Chapter 2 – First-Aid and Amendment Regulations 2007*. Pallas Foods is committed to having an adequate number of persons who are qualified to administer first aid.

The location of the first aid kits and AED device will be communicated to all employees working on the premises. The names of trained first aid employees in each area are displayed on each first aid box and on notice boards.

A stocked first aid room is located off of the main canteen area, Kitchenette area on the first floor and on the Podiums in the Warehouse for the treatment of injured personnel and a Pallas Foods vehicle is available for transporting personnel to local doctors where required.

The first aid box is to be used for First Aid purposes - **'use it but do not abuse it'**. If you see that certain items are missing, in short supply or 'out-of-date', inform the owner so that they can arrange for replenishment.

All injuries must be reported, if you use the First Aid box for any reason, record the usage and make sure you report the injury to the owner.

Following an accident requiring first aid treatment, an accident report form must be completed as required by procedure EHS 002 Accident and Incident Reporting and Investigation. In the event of a serious injury the ambulance service must be called, the EHS Officer, Reuben McManus, must be notified and a full accident investigation carried out as per company policy.

A check will be carried out regularly to identify any replacement stocks needed. Following this check, a list of stock required will be purchased. The restocking of the first aid boxes will be the responsibility of the person responsible for Health & Safety.

Related documents:

- EHS-02 Accident and Incident Reporting and Investigation Procedure

4.4.6.20 Members of Public, Contractors, Visitors and Suppliers

a. Visitors

It is recognised that members of the public are more susceptible to our occupational hazards due to unfamiliarity of the site and the activities taking place. Therefore, all employees must be aware to the dangers of having the members of the public on the site and take all reasonably practicable measures to ensure that no member of the public is injured in any way while visiting the company premises.

The following procedures have been put in place to eliminate or minimise risk to the public and these procedures must be strictly enforced:

- All areas must be kept clear and free from slip-trip-fall hazards – any liquid spillages must be cleared up immediately and trailing cables and excess stock must be avoided where possible.
- The car parks and main pedestrian walkway areas must be treated during frosty weather to help minimise the risk of injury caused by slipping. The Dublin depot facilities team maintain a supply of salt/grit and concerns must be brought to their attention.
- All vehicles must be driven within the specified speed limit.
- The car parking areas must be kept in a tidy condition – all excess materials, must be placed in proper receptacles and not discarded elsewhere.
- No members of the public are permitted to use Pallas Foods machinery or equipment, hand or power tools on the premises.

- All parking should be controlled and not create additional hazards.
- Designated visitor parking areas are available.
- All visitors are to report to reception on arrival and await their site contact, visitors are to be escorted by their site contact all times.
- Visitors are to sign in at visitor book and display visitor badge when on site. Visitors will sign out when departing.
- Visitors are to comply with all site rules, instruction from Pallas Foods personnel and follow signage when on site.

b. Contractors

Contractor's staff must complete the Pallas Foods Contractor Induction training prior to any work commencing.

Contractors are required to supply specific information and documentation as requested by Pallas Foods, to include Work Method Statements, risk Assessments, proof of training and insurance details etc. Failure to supply this information will constitute breach of contract and as such, the contract may be terminated.

The specific information required includes proof of insurances, copy of safety statement, a method statement/risk assessment and training certification where appropriate will be reviewed and reissued on an annual basis.

Contractors must liaise with their Pallas Foods contact and discuss and agree the safety precautions deemed necessary by either party. Contractors must receive approval from Pallas Foods for any chemicals brought onto the premises, provide a SDS and must take responsibility for removing any waste generated by their activities while on site.

Contractors and suppliers must adhere to site safety rules. Contractors and suppliers are obliged to be aware of the terms and conditions of their contract or purchase order from Pallas Foods which has specific safety requirements

and defines consequences which include monetary fines for violations of these requirements.

All works to be completed are to be controlled and planned, a written Method Statement Risk Assessment is to be compiled and reviewed. In some instances a contractor may have to be employed to carry out urgent repair works, which if not carried out could lead to catastrophic consequences to the Health, Safety and Welfare of personnel and on Pallas Foods operations. In these cases the requirements of contractors to prove health & safety competency as outlined in this policy may be relaxed to allow work to proceed. This decision will be taken by the senior manager on site at that time. At a minimum the senior manager must ensure that the contractor has completed a SSWP, risk assessment and completed and signed the Pallas Foods permit to work before they commence this work.

Related documents:

- EHS-05 Control of Contractors Procedure

4.4.6.21 Lone Work

Pallas Foods are aware of the need to manage the hazards associated with lone working. Lone work at Pallas Foods is conducted by delivery drivers, sales reps and maintenance personnel on a routine basis, and by other personnel in specific circumstances, for example if working late or at weekends. Lone workers must take sensible personnel precautions when working alone. EHS-03 Lone Work Procedure describes the process for lone worker protection at Pallas Foods.

Lone workers must be supervised by one of the following means, appropriate to the work situation concerned:

- Periodic supervisory or security checks
- Periodic contact by telephone

- Informing colleagues that you plan to be working alone

Lone workers must not put themselves at risk. If these workers do not feel safe they should discuss the situation with their direct manager.

Lone workers must be familiar with the company emergency procedures. They should also have access to adequate first-aid kits suitable for treating minor injuries.

If there is a risk of violence to the lone worker then the worker should be issued with a phone, personal attack alarm, radio or other suitable device.

Accidents, dangerous occurrences and near misses experienced by those working alone must be properly reported, recorded, investigated and monitored.

Lone working by warehouse staff in the operations area is not permitted.

Related documents:

- EHS-03 Lone Work Procedure

4.4.6.22 Occupational Exposure to Noise

Noise surveys have been carried out by an external consultant to determine what the occupational noise levels are in the facility. These surveys were carried out in conformance with the Safety Health & Welfare at Work (General Application) Regulations 2007, Part 5 Physical Agents, Chapter 1 – Control of Noise at Work and Amendment Regulations 2007. At present, the plant compressor rooms/refrigeration plant rooms are the principle areas of concern. PPE in the form of appropriate ear muffs has been provided and the required warning signs are posted in these areas.

4.4.6.23 Personal Protective Equipment

Personal Protective Equipment (PPE) is managed as required by the Safety, Health and Welfare at Work (General Application) Regulations 2007, Part 2 Workplace and Work Equipment, Chapter 3 - Personal Protective Equipment and Amendment Regulations 2007. PPE is supplied based on the output from risk assessments where a residual risk remains after the implementation of higher priorities on the hierarchy of control. PPE is provided free of charge by the company and on an individual basis. Employees are expected to take care of their PPE and to report any defects. Mandatory PPE must be worn in the relevant areas and where prescribed by risk assessment, procedure or Safe System of Work Plan (SSOW/SSWP). The following PPE is provided and must be used:

- Protective thermal clothing (for example in environments such as the freezer sections of the warehouses)
- Safety footwear
- Hi-vis clothing
- Hard hats (for external work at height)
- Hearing protection for specific tasks
- Eye protection for maintenance work
- Hand protection when using sharp tools or equipment (e.g. in the butchery)
- Harnesses and lanyards for work at height
- Mobile phones, radios
- Vehicle personal safety devices such as seat belts and emergency alert GPS beacon

Where applicable the PPE must be certified to the relevant Euro-norm standard (EN) and carry the CE mark, for example:

- Disposable face masks to comply with EN 149
- Eye protection (e.g. safety glasses) to comply with EN166F?

- Head protection (e.g. bump hat) to comply with EN 812
- Safety footwear to comply with EN ISO 20345, 20346, 20347
- Hi-visibility vest and jackets to comply with EN 471.
- Ear muffs to comply with EN 352-1 and ear plugs to comply with EN 352-2
- Specific safety gloves must comply with EN 388 (Mechanical hazard protection), EN 407 (Temperature protection) and EN 374 (Chemical hazard protection)
- Safety harnesses to comply with EN 361 and associated lanyards with EN 355.



4.4.6.24 Ergonomics, VDUs /Computer Work-stations

Ergonomics is a science concerned between the “fit” for people and their work. It aims to make sure that tasks, equipment, information and the environment fit each worker. It takes into consideration a range of factors including the job/task being done, the individual’s physical and psychological characteristics, the organisational and social environment.

Pallas Foods has a significant number of VDU users in the Telesales, Administrative and other office areas. Our goal is to comply with the Safety Health and Welfare at Work (General Application) Regulations 2007, Part 2 Workplace and Work Equipment, Chapter 5 - Display Screen Equipment and Amendment Regulations 2007.

The company provides training for VDU risk assessors, predominantly in the Telesales/Administrative Areas. The trained VDU assessors conduct assessments as required under the Regulations. Work stations are designed to comply with the requirements for lighting, equipment, furniture and layout. Tasks are designed to ensure that employees can take breaks away from direct use of the VDU screen. Employees are also provided with the opportunity to have VDU related eye sight tests and where applicable corrective lenses and frames are provided.

Laptop/Tablet use

Pallas Foods has a significant number of Laptop/Tablet users in keeping pace with current technology. As a responsible employer, we recognise our duties under current legislation. Therefore, we have introduced a policy that applies to all users of laptop and tablet computers within the company. This should be read in conjunction with the Display Screen Equipment Policy.

The smaller size and design of laptop and tablet computers mean that, if used wrongly, users can experience discomfort. This is because the smaller screen and keyboard/touch screen encourages users to bend over, causing shoulder and neck problems. As a result, it is company policy that laptops will be used according to the following guidelines: •

- Laptop/Tablet are only to be used outside the office and where no desktop computer or docking station is available
- Wherever possible, keep the use of Laptop/Tablet in stationary cars to a minimum. This is to prevent the additional stress on the spine and the increased likelihood of injury that could arise from unsuitable seating and limited space
- Don't overload your Laptop/Tablet bag.
- Distribute weight as evenly as possible • wherever possible the Laptop/Tablet should be positioned on a firm surface, which is the right height for its use •
- You are advised to angle the computer screen to minimise reflections

- Ensure that you have enough space in front of the Laptop/Tablet to rest your wrists and forearms whilst working
- Take regular breaks, at least ten minutes in every hour
- If any discomfort is experienced whilst using a Laptop/Tablet, it must be reported immediately

4.4.6.25 Biological hazards/Blood borne Pathogens

Pallas Foods has identified the potential for exposure to incidental biological hazards in certain areas of its operations. These are inherent in the Butchery section which involves the handling of raw meat and use of knives. Biological hazard is an issue for staff administering First Aid (blood borne pathogens - BBPs). Maintenance staff may be exposed while working on the waste water system. There is potential exposure from the activities required in handling and disposing of our waste which contains contaminated food and rodent waste.

By practising good personal hygiene (washing hands regularly with warm soapy running water and applying anti-bacteria gel) and applying food safety protocols consistently, the risk of exposure is greatly reduced. Any cuts or abrasions must be treated immediately, and workers must ensure good hygiene practices before and after exposure to raw meat.

First Aiders are trained to protect themselves from BBPs, principally by good hygiene practice and wearing the approved medical glove.

Good hygiene must also be practiced by Maintenance and other employees who may work externally. Always wash hands prior to eating, smoking, using the bathroom and at the finish of shift. Applying hand sanitizer (available throughout the site) is encouraged. Legionella is an issue associated with water cooling tower type of air conditioning and refrigerant plant equipment which requires specific training for the facilities team. Water sampling is completed to ensure that the water systems are free from contamination.

Vaccinations (in consultation with medical opinion) are made available to employees who administer first aid, who travel outside the EU, work in the maintenance departments and Waste water treatment systems.

Legionnaires' disease

Legionnaires' disease is a potentially fatal form of pneumonia which can be contracted when people are exposed to water droplets contaminated with Legionella bacteria. Sources of such droplets include hot and cold water systems, showers or spray from taps. Legionella bacteria can survive in low temperatures and can multiply in temperatures between 20 – 45oC. The bacteria can be killed off above 60oC.

Under general health and safety law Pallas Foods's duties include:

- Identify and assess sources of risk from Legionella that may affect Pallas Foods staff and members of the public
- Prepare a scheme or source of action for controlling or preventing the risk
- Implement and manage the scheme by appointing a staff member of Pallas Foods to be managerially responsible
- Keep records and check effectiveness of system of control.

The following steps will be taken to reduce the risk of the presence of Legionella in our water systems:

- Release of water spray is properly controlled.
- Water temperatures and conditions that favour the growth of Legionella and other micro-organisms will be avoided where possible.
- Water will not be left to stagnate – showers / taps will be turned on frequently, redundant pipe work will be removed etc. (Facilities Department)

- Systems will be maintained in a clean manner through treatment processes

Related Documents.

- EHS-019, Procedure for the control of Bloodborne Pathogens.

4.4.7 Emergency Preparedness and Response

Emergency / Fire / Ammonia

Evacuation drills will take place at Pallas Foods as required, generally once every six months. Employees are reminded to familiarise themselves with the procedures so that a fast and effective evacuation of the premises can be completed in the event of an emergency. After each evacuation a review will be carried out to evaluate procedures and carry out any remedial action deemed necessary.

A Fire Register will be kept by facilities and will be monitored by the EHS Officer. The fire register will include company details, specific duties for employees in the event of a fire, a log of fire procedure notices and fire drills, an inventory of firefighting equipment held by Pallas Foods a record of employee instruction/training and a maintenance/test/inspection schedule.

In the event of a fire, the register must be removed to the fire assembly point.

List of Emergency phone numbers

Ambulance 999 / 112
 Gardaí 999 / 112
 Fire 999 / 112
 ESB 1850-372-999
 DDoc 01 8726954
 Fingal Co. Co. Environment Section 01 8905000



Organisation Address	Pallas Foods , Killamonan Road, The Ward, Co Dublin Tel:+ 01 Fax:+353 (1) Web-site	
Medical Emergency	Emergency dial 112 or 999 Nearest Doctor: – Dr Edel McGinnity, Riverside Medical Centre, Mullhuddart Phone number :016467888 Out of hours phone number 01- 45339333 Company Doctor: Dr G Moran, long mile road (01) 456 2871 Nearest Hospital: Connolly Hospital ,Blanchardstown Phone Number 016465000	
Fire	Local Fire Brigade Phone number : 112 or 999	
Electrical	ESB 1850-372-999	
Gas (leaks etc.)	Bord Gáis Eireann (BGE) 1850-200-550	
Occupational First Aid	1. David Flynn: Click & Collect 2. Niall McAteer: 087 992 8595 3. Andy Murray: 087 915 5906 4. Ken Holbrook - Warehouse Evenings 5. Roman Litvinecs - Warehouse Evenings	
Emergency Response Team	<u>Days Shift</u> 1. Stephen Keating 2. Joe Byrne 3. Shay Dorris 4. Reuben McManus 5. Niall McAteer 6. Michael Lowry 7. Caroline Bailey 8. Lukas Hora 9. Nauris Gailans 10. Alen Tote	<u>Evening Shift</u> 1. Jeff Fitzsimons 2. Paul Maguire 3. Paul Freeman 4. Darren Corcoran 5. Natalia Baranczyk

a. Emergency Plan

- In the event of an emergency, the employee, contractor or visitor must immediately raise the fire alarm by activating a BGU.
- Attempts should not be made to extinguish the fire unless the person feels confident enough and has been trained to use the fire extinguisher/hose. At all times the persons attempting to extinguish the fire should place themselves between the fire and the exit route.
- On hearing the fire alarm all persons, with the exception of the ERT members, must immediately stop what they are doing and leave the premises, assembling at their designated fire assembly points.
- The ERT members and the Incident controller shall ensure that the correct numbers of persons are assembled at their assembly point and that all missing persons are accounted for.

b. Fire Prevention Policy

The risks of a fire occurring is considered low taking into account the following preventive procedures:

- Proper control is maintained in regard to persons observing the safety procedures on site.
- A fire detection and alarm system installed at the depots.
- There will be proper waste receptacles and these will be emptied on a daily basis.
- All electrical equipment conforms to ETCI guidance and is certified and maintained as such. Thermal imaging checks of electrical panels is carried out on a regular basis.
- No combustible material within one metre of electrical devices such as storage heaters or equipment charging units.
- Some employees **ERT** have received training as Fire Wardens

Fire Safety

Fire extinguishers, fire hose reels and gas extinguishant are provided and correctly sited to meet safety requirements where required. These appliances are provided to deal with incipient fires. Trained personnel using these appliances should only tackle small fires.

All of Pallas Foods firefighting equipment is tested and serviced annually by certified contractors. In accordance with the recommendation of the appropriate *Irish Standard I.S. 291.1998* for fire equipment, 30% of extinguishers will be discharged each year and relevant employees trained in the safe and efficient use of the equipment.

Pallas Foods employees are very aware of the potential of fire hazards as a result of their activities or smoking on site. All our employees will take all reasonable care in our work activities to ensure we do not generate any potential fire hazards on site.

- Combustible materials will not be allowed to build up on the company premises and will be removed to bins or skips on a regular basis.
- Smoking is not permitted on the site.
- It is strictly forbidden to bring any personal electrical equipment on site.
- Hot work permit is required where hot work is carried out, with regards to maintenance and or construction/alteration of premises. Appropriate firefighting equipment will be maintained on site and in the vicinity of the hot works at all times.
- All firefighting equipment located on the premises of Pallas Foods will be in accordance with the requirements of the area that it is being located, as well as meeting the required classification for that area based on the classifications as per I.S. 290: 1986 standard.

- All employees must finger scan on arrival at work and scan again when leaving the site.

Related documents:

- Procedure **EHS-015 Emergency Response/Evacuation & Fire.**

c. Bomb Threat

If you receive a bomb threat take the following action:

- Do not open any post or packages
- If it is a telephone threat write down the callers exact message
- Dial 999 / 112 and ask for the Gardaí
- Activate the Fire Emergency Alarm System
- Evacuate the premises immediately and do not allow anybody to enter the premises

NB All Bomb Threats to be taken very seriously at all times.

d. Ammonia

Ammonia or Anhydrous Ammonia is used as the refrigerant gas for the warehouse chill and freezer sections. Ammonia interacts immediately upon contact with available moisture in the body.

Some chemical/physical properties of ammonia are:

- At room temperature, ammonia is a colourless, highly irritating gas with a pungent, suffocating odour.
- In pure form, it readily absorbs moisture.
- Ammonia has alkaline properties and is corrosive.
- Ammonia gas dissolves easily in water to form ammonium hydroxide, a caustic solution and weak base.

- Ammonia gas is easily compressed and forms a clear liquid under pressure.
- Ammonia is usually shipped as a compressed liquid in steel containers.
- Ammonia is not highly flammable, but containers of ammonia may explode when exposed to high heat.

Inhalation: Ammonia is irritating and corrosive. Exposure to high concentrations of ammonia in air causes immediate burning of the nose, throat and respiratory tract. This can result in respiratory distress or failure. Inhalation of lower concentrations can cause coughing, and nose and throat irritation. Ammonia's odour provides adequate early warning of its presence, but ammonia also causes olfactory fatigue or adaptation, reducing awareness of one's prolonged exposure at low concentrations.

Skin or eye contact: Exposure to low concentrations of ammonia in air or solution may produce rapid skin or eye irritation. Higher concentrations of ammonia may cause severe injury and burns. The full extent of eye injury may not be apparent for up to a week after the exposure. Contact with liquefied ammonia can also cause frostbite injury.

Ingestion: Exposure to high concentrations of ammonia from swallowing ammonia solution results in corrosive damage to the mouth, throat and stomach. Ingestion of ammonia does not normally result in systemic poisoning

If you smell it take the following action:

- ALERT everyone in the vicinity to evacuate to the staff canteen immediately. REPORT it to your supervisor as you go.
- Proceed towards the staff canteen without delay.
- The Emergency Response Team (ERT) will then control the evacuation

If you hear the ammonia alarm **Don't Panic**

- The ammonia alarm is backed up with flashing amber warning signs
- Do not stop to gather up personal belongings
- **The assembly point is the STAFF CANTEEN**
- If an external assembly point is necessary. One will be identified by the ERT using the windsocks so that evacuees are directed away from and upwind of any leak or gas plume. Windsocks are located around the building.

- Do not return to the building until instructed to do so by the ERT or the emergency services

4.5 Checking

4.5.1 Performance Measurement and Monitoring

OHS Performance Monitoring

Examples of activities which relate to the OHS Management System that are monitored and measured include:

- Hazards and Risks
- Occupational Exposure to workplace noise and chemicals
- Training
- Accidents and Incidents, and associated lost time recorded
- Health and safety training requirements
- Near miss incidents
- OHS Performance of contractors

Progress towards meeting objectives and targets is monitored by means of management meetings. All other OHS functions are reviewed and monitored by the EHS Officer.

Related Documents

- Accident/Incident Reports
- Behaviour Monitoring /Coaching records
- Training records
- Risk Assessments

4.5.2 Evaluation of Compliance

Pallas Foods ensures that it evaluates compliance with legal and other requirements on an ongoing basis using the Pegasus Legal Register (www.Pegasuslegalregister.com) as described in EHS – 12 Legal and Compliance Procedure.

An evaluation of compliance with legal and other requirements is also carried out as part of the annual management review of the safety management system.

Related documents:

- EHS – 12 Legal and Compliance Procedure

4.5.3 Incident Investigation, Non-Conformity, Corrective Action and Preventive Action

4.5.3.1 Accident and Incident Notification and Investigation

All accidents and dangerous occurrences will be notifiable under Regulation 59 of S.I. No.44, 1993 to the Health and Safety Authority (HSA) by the owner on the Accident Report Form and Dangerous Occurrences Form respectively. Procedure EHS-002 Accident and Incident Reporting and Investigation details the requirements implemented by Pallas Foods.

If an employee is absent from work for more than three calendar days due to an industrial injury or illness, it is a statutory requirement (S.I. No. 44. 1993) that formal notice is given to the Health & Safety Authority on the appropriate form 'IR1' (available on www.hsa.ie).

All notification of accidents or dangerous occurrences to the enforcement authority of the HSA will be completed by the person responsible for Health and Safety.

Pallas Foods must also report on OSHA and DART accidents to Sysco on a weekly basis. Accident and incident key performance indicators are maintained at Pallas Foods and Sysco review and set KPI standards at corporate level.

All accidents to a person, whether or not in the employment of the company, resulting in injury, however slight, must be reported to and recorded by the owner and the appropriate accident reporting form filled out.

All accidents must be investigated by the supervisor or manager of the employee and functional area involved, and supported by the EHS team as necessary. Accident Investigation Training has been provided to management by the corporate and local EHS team.

Related documents:

- EHS-002 Accident and Incident Reporting and Investigation

4.5.3.2 Non-conformity, corrective action and preventive action

Reportable Corrective and Preventive actions in response to OHS non-conformance are carried out as appropriate under the management of the EHS manager, Pat Devine, and by the appropriate Pallas Foods personnel or contracted person.

This process is described in Procedure EHS-013 Non-conformity, corrective and preventive action. Changes to procedures resulting from an action are recorded as for all document changes.

Disciplinary Action

Where coaching, advice, persuasion and informal contravention fail to achieve compliance with safety and health rules; it is the policy of Pallas Foods to take disciplinary action on the matter. The process is outlined in the company disciplinary policy & procedure.

Related Documents:

- EHS-02 Procedure for Safety Incident Reporting and Investigating
- Associated EHS-02 forms – reporting person, injured person
- Witness person, first aid person
- Checklist for safety incident investigating

4.5.4 Records

A list of OHS Records is maintained which stipulates the location, period of retention, type of information and responsibility, including for each type of record forming part of the OHS Management System.

All Pallas Foods employees responsible for the keeping of records associated with the OHS Management System must ensure that these are stored and maintained in such a way that they are readily retrievable and protected against damage deterioration or loss.

Related Documents

- Procedure EHS-014 Control of EH&S Records.

4.5.5 Internal Audit

Internal OHS management system audits will be carried out in accordance with the process outlined in the international standard ISO 19011 and Pallas Foods procedure EHS-010 Internal Audit. An audit schedule is generated by the EHS Manager who will ensure that all elements of the OHS Management system are audited at least once per year.

The schedule is reviewed and the frequency of audits is adjusted in view of:

- Results of previous audits
- Results of Risk Assessments

Regular site housekeeping audits are carried out in all areas.

Corrective/Preventive actions in response to audit findings are carried out by the appropriate personnel and monitored by the EHS Manager.

Related Documents

- EHS-010 Internal Audit
- Annual OHS Audit Schedules
- Audit Reports

4.6 Management Review

- A review of the OHS Management System as described in the procedure EHS-009 chaired by the Company President takes place at least annually. This annual meeting will be supported by the regular Safety Steering Group meetings and other meetings during the year (quarterly review) which cover legal compliance, current risk load and resources. There must be a clear link between the OHS management system goals & objectives and the higher Risk Load activities.

Related documents:

- Procedure EHS-009 describes the process for OHS management review.
- Section 6.3 of the EHS-009 procedure outlines the meeting agenda requirement.

Appendix 1: Risk Assessments

Pallas Foods Risk Assessments
ALL RISK ASSESSMENTS

May 2017



1. Ambient Warehouse
 - a. Delivery area/goods in
 - i. Pedestrian walkways
 - ii. Designated drop locations
 - iii. Emergency egress
 - iv. Bay doors
 - v. Dock levellers
 - vi. Use of hand pallet trucks to unload trucks
 - vii. Work in low temperatures environment
 - viii. Supplier/contractor control
 - ix. Abnormal conditions – damaged or insecure loads
 - x. Emergency conditions – failure of traffic control on trucks – truck movement while loading
 - xi. Powered pallet truck operation
 - xii. Fork lift truck operation
 - xiii. Use of MEW for cycle count – Ref cycle count RA
 - xiv. Racking integrity and maintenance
 - xv. Manual handling – picking from storage
2. Chilled Warehouse
 - b. Delivery Area/Goods Inwards
 - i. Pedestrian walkways
 - ii. Designated drop locations
 - iii. Bay doors
 - iv. Dock levellers
 - v. Use of hand held pallet trucks to unload trucks
 - vi. Work in a low temperature environment
 - vii. Supplier/contractor control
 - viii. Abnormal conditions – busy days, Christmas
 - ix. Abnormal conditions – damaged or insecure loads
 - x. Emergency conditions – failure of traffic control – truck movement while loading
 - Chilled warehouse
 - c. Loading areas/bays
 - xi. Loading areas/bays
 - xii. Loading combis into trucks – manual handling
 - xiii. Loading combis – possible damage to combis and physical contact
 - Chilled warehouse
 - d. Quarantine area/ QA
 - xiv. Waste food
 - xv. Powered pallet truck operation
 - xvi. Fork lift truck operation
 - xvii. Use of MEWP for cycle counting
 - xviii. Racking integrity and maintenance
 - xix. Product stability and storage on pallet at height
 - xx. Office station location at various chilled locations

Pallas Foods Risk Assessments

May 2017



- xxi. Manual handling – picking from storage
3. Freezer warehouse
 - i. Pedestrian walkway
 - ii. Ice on floors
 - iii. Access and egress
 - iv. Exposure to very low temperatures(-18 to -20 Degrees C)
 - v. Abnormal conditions – possible leak of refrigerant gas
 - vi. Abnormal conditions – lone working in the freezer
 - vii. Abnormal conditions –locked into freezer
 - viii. Emergency egress
 - ix. Picking of product
 - x. Visitors and contractors
 - xi. Loading combis
 - xii. Powered pallet truck operations
 - xiii. Fork lift truck operations
 - xiv. Racking integrity and maintenance
 - xv. Use of MEWP for cycle count
4. Off-site commercial activities
 - i. Driving Musculoskeletal problems
 - ii. Driving vehicle breakdown
 - iii. Driving parking and manoeuvring
 - iv. Collision
 - v. Physical or verbal assault
 - vi. Lone work
 - vii. Vehicle washing and refuelling
 - viii. pre-existing medical condition *
 - ix. exposure of pregnant employees
- Emergency conditions
 - x. fire or explosion in the vehicle
5. All Depots
 - Delivery
 - i. Driving Musculoskeletal problems
 - ii. Driving vehicle breakdown
 - iii. Driving parking and manoeuvring
 - iv. Loading trucks with combis/cages
 - v. Unloading trucks
 - vi. Unloading combis/cages with tail lift
 - vii. Delivering from the truck to the customer premises
 - Parking
 - ix. Verbal or physical assault
 - x. Lone work
 - xi. Pre-existing medical conditions
 - xii. Exposure of pregnant employees to certain types of work in the warehouse
 - xiii. Handling of chemical product
 - Emergency condition
 - xiv. Collision
 - xv. Fire or explosion in the vehicle
 - xvi. Vehicle wash and refuelling

Opco 349 Dublin & Depots Safety Statement

Pallas Foods Risk Assessments

May 2017



6. Demonstration Kitchen

- i. Kitchen area
- ii. Cookers, ovens hot plates
- iii. Cookers, ovens, hot plates, deep fat fryers, microwaves
- iv. Knives and other sharp implements
- v. hot water, oil, food, plates, cooking utensils
- vi. biological waste (food and contaminated packaging)
- vii. Microwave oven
- viii. Dishwasher
- ix. Fridges and Freezers/freezer compartments
- x. Food consumption/tasting
- xi. Exposure to rodents or other animals
- xii. Exposure of pregnant employees to certain types of work in the kitchen
- xiii. Lone work
- xiv. First aid provision
- xv. Visitors/clients

7. Common hazards of office areas

- i. Computer work station VDU's
- ii. Photocopiers, Ozone, nitrogen oxide,
- iii. Changing photocopier cartridge
- iv. Housekeeping
- v. Telephone use (with headset)
- vi. Manual handling: copier paper office equipment, laptops
- vii. Electrical equipment (i.e. photocopiers, computers and printers)
- viii. Slips trips falls - Floor conditions, spills, leaks, damage
- ix. Lighting
- x. Stress
- xi. Bullying and harassment
- xii. Violence
- xiii. Exposure of pregnant employees to certain types of work
- xiv. Lone work
- xv. First aid provision
- xvi. Failure of electrical supply
Emergency conditions
- xvii. Fire or explosion

8. Common warehouse

- i. Racking integrity and maintenance
- ii. Product stability and storage on pallets at height
- iii. Aisle ways - markings and signage
- iv. Power pallet truck operation
- v. Fork lift truck operation
- vi. Hand trucks
- vii. Segregation of pedestrians and warehouse vehicles
- viii. Use of the voice systems
- ix. Use of MEWP for cycle counting

9. Hazards common to warehouse areas – Manual handling

- i. Manual handling, loading and handling of combs

Pallas Foods Risk Assessments

May 2017

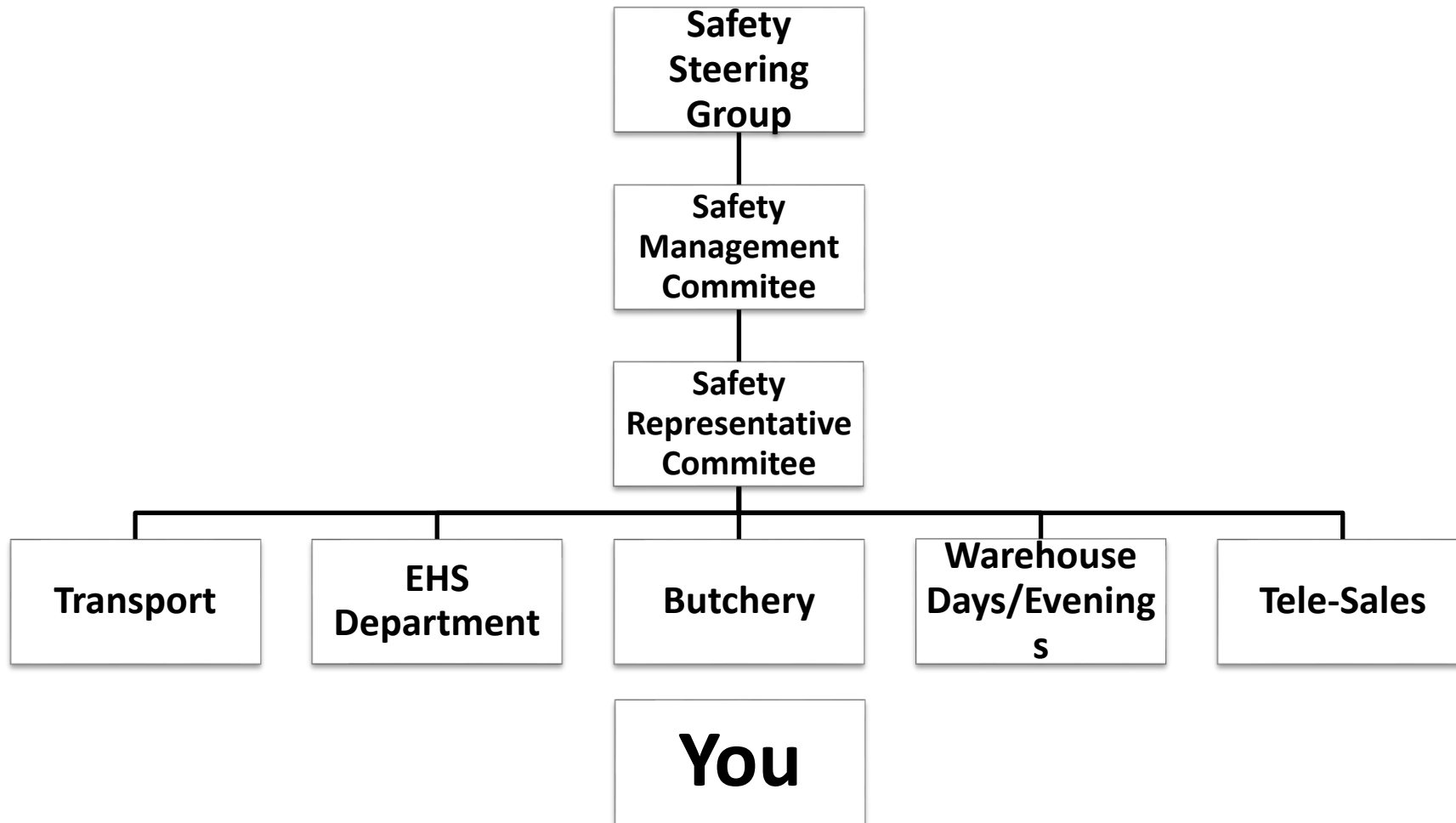
- ii. Manual handling picking from storage
 - iii. Manual handling waste management
 - iv. Manual handling housekeeping cleaning
 - v. Manual handling re-palletising product from damaged pallets
10. Hazards common to warehouse areas – Electricity
- i. Use of electrical equipment
11. Hazards common to warehouse areas – exposure to chemical and physical agents
- i. Storage and handling of chemical products
 - ii. Use of cleaning chemicals
 - iii. Exposure to noise – voice system
 - iv. Exposure to noise
12. Hazards common to warehouse areas – Biological hazards
- i. Exposure to raw meat
 - ii. Exposure to rodents or other animals
13. Hazards common to warehouse areas – Human factors
- i. Stress
 - ii. Bullying and harassment
 - iii. Violence
 - iv. Language and communication issues
 - v. Shift work
 - vi. Pre-existing medical conditions
 - vii. Exposure of pregnant employees to certain types of work in the warehouse
14. Hazards common to warehouse areas – Abnormal conditions
- i. Collapse of a line of racking
 - ii. Fire or explosion
15. Newcastle West – All areas – Lone working
- i. Violence
 - ii. Fire
 - iii. Ill Health
 - iv. Manual handling
16. Warehouse yard – Picking loading – dispatch shift
- i. Poor aisle surface condition
 - ii. Aisles too narrow
 - iii. Inadequate pedestrian equipment segregation inside
 - iv. Yard: Inadequate pedestrian equipment segregation out in yard
- b. Product stored at height in racking
- i. High storage locations - approx. half of freezer, chilled and ambient sector
 - ii. Higher risks storage locations (over travel routes)
- c. Equipment common to warehouse areas
- i. Power pallet trucks
 - ii. Cage/ combi
 - iii. Fork lift trucks
 - iv. MEWP
 - v. Trailer/fridge
 - vi. Hand trucks
 - vii. Hand carts

Hard Copy Risk Assessments area available in each operational area and on the company server.

Appendix 2: Emergency Response Team

Incident Commander - Reuben McManus or designee						
DAYS	FIRE TEAM	Dept	FIRST AID	Dept	UTILITIES FAILURE	Dept
	Stephen Keating	Warehouse	Ger Orr	Warehouse	Shay Dorris	Facilities
	Joe Byrne	Warehouse	Andy Murray	Warehouse	Mick McKeown	Facilities
	Shay Dorris	Facilities	Niall McAteer	Transport	Martin Nesbitt	Systems
	Reuben McManus	EHS Department		Transport		
	Niall McAteer	Transport		Warehouse		
	Michael Lowry	Warehouse		Tele-Sales		
	Caroline Bailey	Tele-Sales		Tele-Sales		
	Lukas Hora	Transport				
	Nauris Gailans	Warehouse				
Alen Tote	IT Department					
Incident Commander - James Gallagher or designee						
EVENINGS	FIRE TEAM	Dept	FIRST AID	Dept	UTILITIES FAILURE	Dept
	Jeff Fitzsimons	Warehouse	Ken Holbrook	Warehouse	Shay Dorris	Facilities
	Paul Maguire	Warehouse	Roman Litvinecs	Warehouse	Mick McKeown	Facilities
	Paul Freeman	Warehouse		Warehouse		
	Darren Corcoran	Warehouse		Tele-Sales		
Natalia Baranczyk	Tele-sales		Warehouse			

Appendix 3: Safety Committee Organisation Chart



Appendix 4 Pallas Foods Opco 349 First Aiders



Ken Holbrook
Warehouse – Evenings



Andrew Murray
WH / Systems
Days - Ext 41556



Niall McAteer
Transport Supervisor
Days Ext 41573



David Flynn
Click & Collect – Days



Gerard Orr
Warehouse - Days



Roman Litvinecs
Warehouse – Evenings

Appendix 5: Pallas Foods Opco 349 Safety Representatives



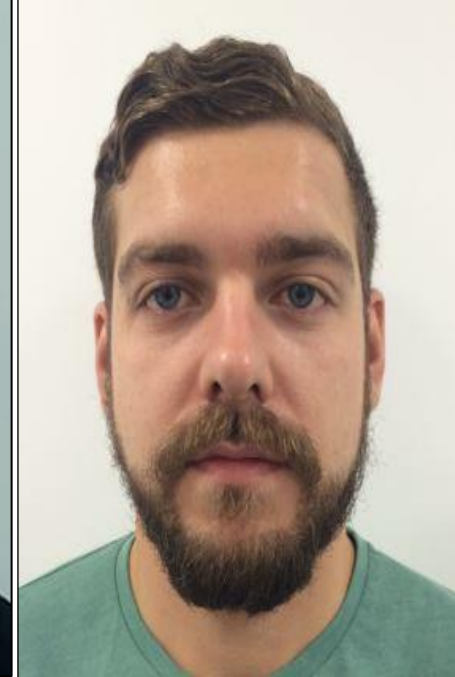
Dave Flanagan - Transport



Caroline Bailey – Tele-Sales



Patrick Galvin - Warehouse



Mantas Jankauskas

Appendix 6: Brief for Safety Representatives

Safety Representatives have duties, responsibilities and rights under the Safety, Health and Welfare at Work Act 2005 and these are highlighted in this briefing document.

1. Election of Safety Representatives

- Pallas Foods employees to propose, decide on, select and appoint a safety representative or, by agreement with Pallas Foods Management, more than one safety representative to represent them in consultations with the management on matters of safety, health and welfare at the place of work.
- There will be no specific term of office. However, to gain most benefit from knowledge acquired and training received during the period, a term of office of about three years will be deemed appropriate. However each Safety Representative will be reviewed by the employees, on an annual basis.
- Elections will be organised annually through a combination of the EHS and HR departments.

2. Management Responsibility

It shall be the Safety Representatives department manager's responsibility to ensure that the Safety Representative,

- Has received the appropriate training to be able to carry out his or her duties.
- Has their roster organised so as to allow them attend meetings and carryout investigations without any loss of time, pay or conditions.
- Does not allow their duties to negatively affect them in any way.
- Be aware that being a Safety Representative gives individuals additional rights under legislation.
- To ensure they make themselves available to the Safety Representative to discuss Health & Safety issues.

3. Consultation on Health and Safety Issues

Safety Representatives may consult with, and make representations to the management on safety, health and welfare matters relating to the employees in the place of work. The management must consider these representations, and act on them if necessary. The intention of these consultations is to prevent accidents and ill health, to highlight problems, and identify means of overcoming them. Consultations would be particularly important when changes are taking place, for example when drawing up safety plans, or introducing new technology or work processes. They also have a part to play in long-established work practices and hazards.

4. Accident/Dangerous Occurrences Investigations

A Safety Representative may investigate accidents and dangerous occurrences in the place of work to find out the causes and help to identify any remedial or preventive measures necessary. However, a Safety Representative must not interfere with anything at the scene of the incident. Nor can the Safety Representative obstruct any person with statutory obligations from doing anything required of them under occupational safety and health legislation.

5. Health and Safety Inspections

A Safety Representative may carry out inspections in the place of work to identify hazards and risks to safety and health. However, the management must be notified before such inspections take place.

The appropriate frequency of inspection will depend on various factors e.g.:

- Size of place of work
- Nature and range of work activities
- Nature and range of hazards and risks
- Changing hazards and risks.

The frequency of inspections must be agreed with Pallas Foods management. However, management may not unreasonably withhold agreement.

There is no standard duration for inspections, and the time taken will vary according to the circumstances. A place of work with relatively low-level risks may be inspected competently in a single session, while a place with a high risk level will take longer. There may also be varying risk factors in different locations in the same workplace, which would obviously require inspections of different frequency and duration.

Inspections can take various forms. Some common types of inspection are:

- Safety tours: general inspection of the workplace
- Safety sampling: systematic sampling of particularly dangerous activities, processes or areas
- Safety surveys: general inspections of particularly dangerous activities, processes or areas.

These types of inspection can be used either separately, or in any combination. The Safety Representative may wish to consult the relevant Manager on the most suitable method when deciding on the form of inspection.

On occasions and by agreement a Safety Representative could usefully be accompanied by a member of management or of the EH&S Department during inspections. It might be appropriate, for example, for the EH&S Manager to be present to give advice on technical safety and health matters. The situation could also arise where it may be necessary to protect the Safety Representative's own safety and health during the inspection.

The Safety Representative should have the opportunity to discuss safety and health matters in confidence with employees he/she represents.

A Safety Representative may investigate situations where there is reasonable fear of risk of personal injury to the employees represented, or where complaints have been made by employees about potential hazards. The management must be notified before such investigations are carried out.

The management is required to inform a Safety Representative when a Health and Safety Inspector arrives to carry out an inspection, if this is practicable. It is very important that the relevant manager should make every effort to meet this requirement.

If the Safety Representative requests it, he/she may accompany an Inspector during an inspection, but not when the Inspector is investigating an accident. (The employer or employer's representation may also accompany the Inspector).

A Safety Representative is entitled to consult a Health and Safety Inspector, either orally or in writing, about any aspect of safety, health and welfare at work. The Representative may receive advice and information from the Inspector on such matters.

6. Entitlement to Information

Safety Representatives are entitled to two types of information. First, employers have a duty under the Act to provide such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the safety and health at work of all their employees.

Second, the Safety Representative has a separate right to information from the employer. Safety Representatives will need to be given information by the employer over and above that necessary for employees in general.

The information made available to Safety Representatives will enable them to fulfil their functions properly and play an informed part in preventing accidents and ill health and promoting safety and health in the workplace. The type of information will vary according to the hazards and risks involved.

In all cases the management will have provided Safety Representatives with their Safety Statement and the Safety Representatives should be fully briefed on the arrangements and organisation for implementing it.

They should also be supplied with any necessary technical information about hazards and precautions connected with articles or substances in the place of work. Examples of such information would include hazard data sheets, instruction manuals, or any other information, including revisions, supplied by a designer, manufacturer, importer or supplier. (Article is defined in the Act as including any plant, machinery, apparatus and equipment for use or operation at work and substance is defined as including any natural or artificial substance, preparation or agent, whether solid, liquid, gas, vapour or micro-organism.)

Safety Representatives should also be given adequate information about the place of work, the system of work and any changes in either that would affect existing hazards or precautions. This would include any reports relating to occupational safety, health and welfare commissioned by Pallas Foods relating to place of work, information on occupational accidents and ill health at the place of work and collective data on the results of any relevant health assessments carried out (without identifying any individual).

In addition, Pallas Foods would be expected to supply any necessary information about appropriate precautions, safeguards (such as permit to work systems), measures to be taken in emergencies, including the names of employees with designated emergency duties, etc. which are currently in place or which should be provided to minimise the risks to safety and health arising from hazards at work.

6.1 Limitation to Information

Since a properly informed Safety Representative can play an important role in preventing accidents and ill-health, it is in the company's interest to ensure that Safety Representatives are supplied with all the relevant information. However, there are limited exceptions:

- Any information which he/she could not disclose without contravening a legal prohibition.
- Any information relating to an individual without their consent.
- Any information which, for reasons other than its effect on safety, health and welfare at work, could cause significant damage to the employer's business.
- Any information obtained by the employer which could affect his legal position in taking or defending any legal proceedings.
- The Safety Representative can get two kinds of information from Inspectors:
 - Factual information to do with safety and health in that particular place of work, except any information revealing a trade secret.
 - Information about any action the Inspector has taken or proposes to take in connection with the place of work.

The Inspector must also give this information to the employer.

Appendix 7 Emergency Response Phone List

**Each Manager Should be called if an Evacuation Takes Place at Night
Or on Weekends and Holidays**

<u>Responsibility</u>	<u>Name</u>	<u>Phone</u>
Ammonia Maintenance tech	Brian A Flynn	069-62044
Director of Operations	Ian Smith	01 - 8246951
Warehouse Manager	Pawel Szabo	087-7995101
Night Warehouse Manager	James Gallagher	087-7379095
EHS Officer	Reuben McManus	01-8246960
Facility Manager	Shay Dorris	087- 6729948
Fleet Manager	Jamie Robinson	087- 9943487
HR	Sonia McGowan	01 - 8246961
Warehouse Supervisor Days	David Sweeney	087- 1889186
Warehouse Supervisor Nights	Sharon Walters	01 - 8241556
Warehouse Supervisor Days	Jeff Fitzsimmons	01 - 8241556
Butchery	Tom Duffy	01 - 8246963
Kitchen Development	Simon Hudson	01 – 8246908
IT Department	Karl Tapley	01 – 8246985

Local Emergency Contacts

Emergency Services	999
James Connolly Hospital, Blanchardstown, Dublin	01 - 646 5000
Blanchardstown Fire Brigade	01 - 673 4000
Fingal County Council (Environmental Section)	01 - 890 5000

Corporate Emergency Contacts

Environmental Health & Safety Manager	069 – 22131
Media Relations	069 22167 or 087 777 4721

State Authorities

The Health & Safety Authority	1890 – 289 - 389
The Environmental Protection Agency HQ	053 - 916 – 0600

Consultants & Ammonia Supplier

Brian A Flynn Refrigeration	069-62044
-----------------------------	-----------

Ammonia Department Employees Phone Numbers

Refrigeration Technician	Mick McKeown	087- 1458917
--------------------------	--------------	--------------

