



**Turbine Surface**  
Technologies

# Operate Safely

## Occupational Health, Safety and Environmental Policy



OHSE  
Issue No: 18  
Date: March 2024  
Review Date: March 2025

## Occupational Health, Safety and Environment (OHSE)

**Policy** TST are committed to taking care of our occupational Health, Safety and Environmental (OHSE), operating safely and creating an environment where each of us can be at our best.

**How does the principle apply and what does it apply to?** TST recognises and accepts its health, safety and Environmental duties for providing a safe and healthy working environment (as far as is reasonably practicable) for all its workers (paid or volunteer) and other visitors to its premises under the Health and Safety at Work Act 1974, the Fire Precautions (Workplace) Regulations 1997, the Management of Health and Safety at Work Regulations 1999, other relevant legislation and common law duties of care.

**Which parts of TST are affected?** This policy applies to all workers:

- all permanent employees
- fixed term employees
- internal secondees (TST employees on internal secondment)
- agency employees
- Contractors
- Interns
- Visitors

**Worker Definition** Worker – Any person who does work activities and is under the control of the company. This would include employees, contractors, summer student workers, temporary workers, etc.

**What support is available to help TST implement this policy?** Support and advice on the Occupational Health, Safety and Environmental Policy is available from the Head of Quality, Health, Safety and Environment

**Important Note:** This document covers our approach to Occupational Health, Safety and Environment. You need to take the time to read and understand the policy to ensure we comply with any specific legislation

## Document control details

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| <b>Owner:</b>                     | Adam Bramley            |  |
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| 17          | 1NOV23                 | Adam Bramley    | <b>Mar 24</b>     | 1) SCOP 2 reference removed from 10.8 and replaced with Non-conformance Procedure (OHSE008).  |
| 18          | March 2024             | Adam Bramley    | <b>March 2025</b> | Merged with Environmental Policy. Full rewrite.   |
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## 1. Introduction

There are compelling human, financial and legal reasons for giving proper attention to OHSE matters. Accidents, ill health and Environmental Damage can have a high impact upon individuals and the overall business and they often cause unnecessary misery, threaten livelihoods, loss of profit and tarnish a Company's reputation.

I am personally committed to achieving the best levels of performance in OHSE and I want you all to share this commitment and help develop the best possible OHSE culture throughout Turbine Surface Technologies Limited.

**Our aim is to create a working environment that supports employee wellbeing, with an aspiration towards zero work related ill health, accidents or harm to people or our Environment.**

This key part of professional management will involve time, effort and money, but the human and business gains outweigh the costs. Each area will need effective OHSE management systems to minimise risks to all employees, contractors and visitors. It is my expectation that everyone takes accountability to reduce risks, Aspects and impacts throughout our activities and actions.

OHSE will always continue to be integrated into the key business decision making processes and Turbine Surfaces Technologies Limited will continue to meet our high standards, ensure compliance with legal and other requirements and drive towards best practice. To this end, the company is committed to alignment with ISO 45001 and ISO14001, Occupational Health and Safety management and Environmental Management systems".

The scope of the management systems include all TST operations and workers at Both Site One and Site Two in Annesley, as well its visitors - including contractors.

I expect that a culture will be sustained where people can speak openly about OHSE matters and that everyone within the organisation will work together in a pro-active manner to reduce the risks within the business.

Employees should speak up if concerned about an activity or decision, including stopping work that we think may be unsafe to people, Infrastructure or the environment and seek advice and support when necessary. TST is a safe place for workers to report accidents / incidents and near misses without facing reprisals

This document describes the policy, organisation and arrangements which are implemented throughout Turbine Surfaces Technologies Limited. Each of you must personally ensure that it is being applied in your part of the organisation.

**John Kilgallon  
General Manager**

## 2. OHSE Policy Statement

TST recognises and accepts its responsibility as an employer for providing a safe and healthy work place and working environment for all its employees to at least the minimum standards required by Health, Safety and Environmental Law.

We also recognise that environmental issues are of fundamental importance to a successful and responsible business strategy, both for the Company and its customers.

TST will take all reasonably practicable steps to meet this responsibility, paying particular attention to the provision and maintenance of:

- Plant, equipment and systems of work
- Safe arrangement for the use, handling, storage and transport of articles and substances.
- Sufficient information, instruction, training and supervision to enable all employees to avoid hazards and contribute positively to their own safety and health at work
- A safe place of work with appropriate welfare facilities
- Provision of a framework which supports the setting of strategic objectives which achieves continual improvement
- Commitment to hazard identification to reduce occupational health, safety and Environmental risks
- Commitment to compliance with legal requirements and other requirements
- Commitment to consultation and participation including worker representatives
- Commitment to comply with requirements of ISO 45001 and ISO14001
- Identify opportunities across the current manufacturing process, new technology and capital investments to reduce resource consumption of materials, energy and water normalised per output to be sustainable in the long term.
- TSTL will operate in a manner that prevents or avoids pollution

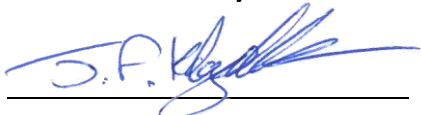
TST will ensure that OHSE management systems are in place to minimise risks to all employees, contractors and visitors. The company is committed to certification to both ISO 45001 and 14001 "Occupational health and safety and Environmental management systems". It is expected that everyone will take personal accountability to reduce risks, Aspects and impacts throughout our activities and actions.

No OHSE policy is likely to be successful unless it actively involves people at work and for TST employees this forms part of their contract of employment. In this connection TST reminds its employees of their own legally binding duties to take care of their own health and safety and that of other employees and other people on the premises and to co-operate with TST so as to enable it to comply with its statutory obligations.

This policy will be reviewed, may be added to or modified from time to time and may be supplemented, in appropriate cases by further statements relating to the work of particular departments or groups of employees.

### Occupational Health, Safety and Environmental Policy Statement

Signed:



Date:

18<sup>th</sup> June 2024

Name:

**John Kilgallon**  
**General Manager**

### 3. TST OHSE Strategic Objectives

We are committed to taking care of our occupational health and safety (H&S), operating safely and creating an environment where each of us can be at our best.

We believe that a safe and healthy workplace, is a better place for our people, our customers and our business. Our H&S performance is fundamental to our success and is an integral part of how we work every day.

TST's overall objective is to comply with legal requirements and Company Health and Safety policies To do this we follow the below objectives:

1. To create a working environment that supports employee wellbeing, with an aspiration towards zero work related ill health, accidents or harm to people.
2. To meet HSE Legal requirements and apply industry best practice in everything that we do where reasonably practicable.
3. To create a positive culture where people can speak openly about OHSE matters and that everyone within the organisation will work together in a pro-active manner to reduce the risks within the business.
4. To ensure risks are managed as low as reasonably practicable within the business and that the hierarchy control is considered to: Eliminate, Reduce, Prevent, Safe Systems of Work, Use of PPE.
5. Ensure that OHSE is integrated into the key business decision making processes.
6. To ensure that employees receive sufficient OHSE Information, Instruction, Training & Supervision.
7. To ensure that OHSE metrics are in place to measure performance, and these are owned and made available to all employees and regularly reviewed.
8. To ensure that individual's Accountability & Responsibility is clear and that responsible people make clear statements about their subject areas to communicate and highlight issues to the wider team.
9. In support of the above, for the H&S management system to align with and subsequently be certified to ISO 45001.



## TSTL Environment Strategic Objectives

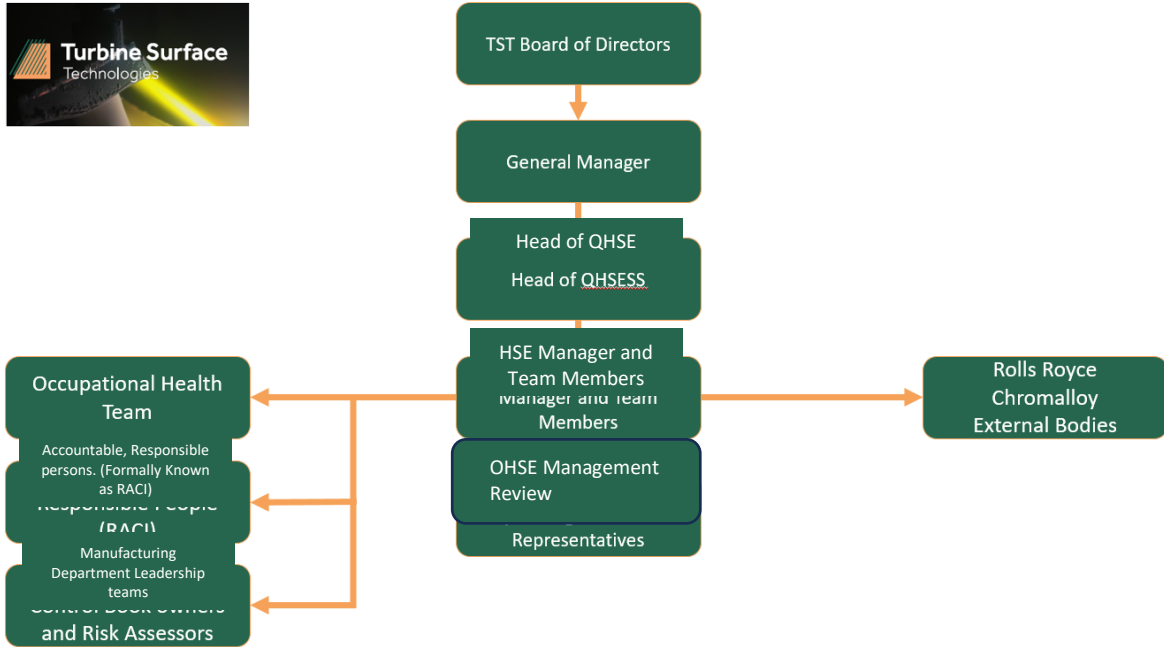
TST have an overall objective to comply with the OHSE Policy, to comply we have the following objectives:

1. To maintain an Environmental Management System (EMS) that meets the requirements of ISO 14001:2015
2. TST will protect and retain a workforce that are proud to be part of the company and encourage environmentally responsible behaviours
3. Identify opportunities across the manufacturing process and tier 1 suppliers to reduce resource consumption of materials, energy and water normalised by output to be sustainable in the long term.
4. Contractors will be selected that behave in an environmentally responsible manner to help TST achieve the outcomes of the EMS
5. TST aims to operate in a manner that prevents or avoids pollution
6. Meet the environmental requirements, where practicable of our major shareholders and customers. This could include future Net Zero Carbon and Sustainability targets.
7. Promote the achievements of the Environmental Management System
8. Comply with relevant environmental legislation and other identified obligations
9. Manage risks and opportunities to continually improve the EMS and improve the resilience of the business (Business Continuity)
10. Review the policy and change where necessary

#### 4. Structure of Health and Safety Documentation

| Document Level | Document                           | Authority       | Issued to   |
|----------------|------------------------------------|-----------------|---|
| a)             | TST OHSE Policy                    | General Manager | Copies of the Policy will be available for reference in each Department via:<br>Online<br>Noticeboard<br>OHSE Dashboard |
| b)             | AP, RP (Formally RACI)             | HSE Team        | Reviewed in Bi-Monthly OHSE Management Meeting.   |
| c)             | TST OHSE Codes of Practice (SCOPS) | HSE Team        | As defined by each procedure<br><br>Copies of all SCOPS can be found on the OHSE Dashboard                              |
| d)             | OHSE Procedures                    | HSE Team        | OHSE Dashboard  |
| e)             | Heat Map                           | HSE Team        | OHSE Dashboard  |
| f)             | Risk Assessments                   | HSE Team        | OHSE Dashboard  |
| g)             | COSHH Assessments                  | HSE Team        | SYPOL   |

## 5. Turbine Surface Technologies OHSE Organisation Structure



## **6. OHSE Accountability & Responsibilities**

### **6.1 General Manager**

The overall accountability for OHSE Management at TST is vested in the General Manager.

They shall, in conjunction with the TST Board, ensure that appropriate mechanisms are in place to enable the Company to fulfil its OHSE responsibilities. They shall provide positive leadership and visible commitment to the Company's standards and management system for OHSE.

### **6.2 Management and Supervision**

All managers and supervisors are responsible for the health and safety of all persons (including visitors and contractors) and Aspects and Impacts of the environment within their areas. They must be aware of the specific legal requirements, which apply to their area, the legal requirements and the Company policy in respect of those regulations, and what they must do to meet the relevant standards. They must ensure that, where applicable to their area:

- a) Regular OHSE risk assessments are undertaken and appropriate controls & recovery measures are implemented in a timely manner.
- b) Regular tours of all areas will be undertaken to pro-actively identify improvements as a means to prevent further incidents or accidents. These shall be formally recorded and closed out using the shout up! system.
- c) All necessary job instructions are provided, and warning notices and signs are displayed and enacted.
- d) Protective clothing, equipment, devices and aids are available, properly used and maintained.
- e) OHSE objectives and targets are set and monitored to improve performance.
- f) Key notifications are controlled through "H&S OR ENV Alerts" or "OHSE" meetings.
- g) Relevant records are held and kept up-to-date.
- h) All equipment is safe and checked by competent technical specialists.
- i) All necessary training is given, and any relevant legal and specific hazard information is issued.
- j) OHSE accidents & incidents are reported and, as appropriate, investigated to determine cause and expedite any corrective action.
- k) All relevant OHSE considerations are applied to employees working away from company premises.

### **6.3 All Employees**

All persons employed by TST have a duty to themselves, their colleagues and the community to work in a safe and responsible manner. To that end, all employees must:

- Take action to prevent work related accidents, ill health and incidents (work in a way to ensure the safety of themselves, others and the environment).
- Report OHSE good spots, unsafe acts, unsafe conditions and near misses immediately.
- Work in a pro-active manner and suggest areas for improvement to supervision and the OHSE team.
- Report all OHSE incidents however minor to supervision.
- Follow the OHSE rules relating to their job.
- Use the control measures, protective clothing, equipment and devices where issued.
- Co-operate with all OHSE instructions and procedures.

## **7. Turbine Surface Technologies OHSE Supporting Specialists**

Employers are required to appoint competent persons to assist them in undertaking the measures necessary to comply with the requirements and prohibitions imposed by legislation. In addition, the fulfilment of certain OHSE objectives and standards requires the allocation of particular responsibilities to competent individuals.

### **7.1 Head of Health, Safety, Environment and Quality**

Main responsibilities are:

- a) To agree company OHSE policies, arrangements, standards and develop implementation plans
- b) Instigate Behavioural Safety Processes and improve Safety Culture
- c) To provide specialist OHSE advice and guidance
- d) Participate in Investigations in to significant accidents and dangerous occurrences
- e) Liaise with corporate and external OHSE specialists
- f) Liaise with Health and Safety Executive and other enforcing authorities

## 7.2 OHSE Team

Main responsibilities are:

- a) To develop company OHSE policies, arrangements and standards and monitor implementation.
- b) To provide specialist OHSE advice and guidance
- c) Investigate significant accidents and dangerous occurrences
- d) Carry out audits and inspections to monitor compliance
- e) Liaise with corporate and other external OHSE specialists
- f) Conduct OHSE audits and reviews
- g) Liaise with Health and Safety Executive and other enforcing authorities
- h) Co-ordinate OHSE training

### **7.3 Individuals and Special Responsibilities**

In addition to the full time OHSE team a number of individuals undertake particular tasks as part of their everyday duties.

Those involved shall have received appropriate, approved training before being appointed to the task and shall be given the time and resources to carry out their duties effectively. Some examples are listed below. This list is not exclusive. The full list of special responsibilities is detailed in the AP, RP document (formally RACI.)

- **First Aiders**

They will provide first aid to all persons taken ill or injured on Company premises as required by the First Aid at Work Regulations.

- **OHSE Risk Assessors**

Responsible for carrying out risk assessments and recommending control measures in accordance with topical legislation including the Management of Health and Safety at Work Regulations and the Control of Substances Hazardous to Health Regulations.

- **Radiation Protection Supervisor**

Responsible for supervising the day-to-day adherence to legal and Company ionising radiation requirements. They will liaise with the OHSE team, enforcing authorities and the Company's external Radiation Protection Adviser (from the Public Health England).

## **8. Health, Safety and Environmental Support**

### **8.1 External Non – Turbine Surface Technologies HS&E Professionals**

Specialist help is available from the Joint Venture Partner HS&E departments. These specialists support TST in discharging its HS&E responsibilities.

### **8.2 Occupational Health Department – TST Team**

A full time Occupational Health team is employed and the services provided by this department include:

- Management of Health & Wellbeing
- Employee medical assessments & Health screening
- Administration of employee medical records
- Drug screening
- Vision screening
- Health promotion
- Assisting in absence management

*See Occupational Health and Mental Health & Wellbeing Policy*

### **8.3 Facility and Services Management at TST**

The bulk of the facility and services management will be undertaken internally by TST.

Some services (e.g. Statutory Inspections, Legionella assessments, testing of fixed electrical installations) will be undertaken by external, approved contractors.

#### **Ionising Radiation**

At the time of authoring the Company utilises the services of a Radiation Protection Adviser from Public Health England to advise the Company on radiation safety requirements. Any change from this will be documented.

## **9. Management of OHSE at TST**

### **9.1 TST Board of Directors**

The TST board is the determining body for OHSES Policy and Practice at TST. They shall ensure that the Company complies with OHSE Policy by having effective procedures supported by adequate resources, training, information and competent advisors.

Advice on Policy matters may be sought from the Joint Venture Partners OHSE departments, as well as the Company's Head of Health, Safety, Environment.

TST, via the TST board and TST senior managers, shall set OHSE objectives and monitor performance periodically (for example by Inspection and Audit).

The TST board shall provide positive leadership and visible commitment to the Company's OHSE Policy and Practice.

### **9.2 Management, Supervision, and Company OHSE Standards**

It is essential that all employees comply with all Company OHSE Standards (as well as pertinent legislative standards – Acts, Regulations, Approved Codes of Practice etc.)



### **9.3 Health, Safety, Environment and Welfare Inspections and Audits**

The management of OHSE is an integral part of every manager and supervisor's role at TST. Effective management of the hazards within TST is essential if we are to protect our employees, control costs, meet our objectives, and enhance the Company's reputation.

An AP, RP Document (Formally RACI) will be maintained to show management teams' commitments to OHSE within the business.

### **9.4 OHSE Management meeting**

This will be chaired by the General Manager or a senior member of the management team and presented by a member of the OHSE team. This forms an important part of the governance of OHSE to ensure that TST OHSE strategic objectives are being met.

The objectives of the meeting include but are not exclusive to:

- Promote and develop OHSE culture and attitudes
- Promote co-operation between management and employees on OHSE issues;
- Promote the effective control of OHSE through the identification of hazards, assessment of risks and environment effects, development of control measures and review of compliance and effectiveness;
- Promote measures that will assist in the continual improvement of OHSE management practice and standards;
- Promote safety and environmental awareness, individual responsibilities and an attitude where it is accepted that accidents and work-related ill health need not happen.
- Update on TST environmental Aspects and Impacts.

On an annual basis, the OHSE department provides a review of the last 12 months performance. Slides from the meeting are displayed on the OHSE board on the shopfloor. The trade union representatives are also invited to this session for consultation on behalf of the workers.

## **10. Arrangements for Eliminating, Reducing or Controlling Risk**

### **10.1 OHSE Risk Assessment**

TST policy is to identify all significant hazards and systematically carry out risk assessments in accordance with the risk assessment standards contained in TST Safety Codes of Practice (SCOPS) particularly **SCOP 3** and **SCOP 8**. Management shall ensure the most suitable method of preventing exposure, controlling the risk, and limiting liability is recorded on the risk assessment together with corrective action date appropriate to the level of risk identified.

All risk assessments will be subject to review taking account of any time period stipulated in the relevant Company standard.

Only properly trained risk assessors shall conduct OHSE risk assessments.

All risk assessments must be recorded in the appropriate Company risk assessment register.

A copy of the risk assessments shall be retained by the relevant area and used to formulate prioritised improvement plans for OHSE with priority given to significant risks. All risk assessments are accessible via the OHSE Dashboard. Open actions are tracked and reviewed at various OHSE meetings.

Management and supervision shall ensure their employees are made aware of all the risk assessments that apply to the work they do and that any control measures identified are in place and adhered to.

### **10.2 Personal Protective Equipment (PPE)**

Where it is not possible to eliminate hazards to the person by any other reasonably practicable means, then employees will be issued with personal protective equipment (PPE).

PPE is issued free of charge to employees when a risk assessment declares it is required to protect employees from hazards.

Management and supervision shall ensure their areas working practices and hazards are reviewed to attempt to eliminate the need for PPE.

## **10.3 OHSE Audit**

### **10.3.1 OHSE Audits at TST**

Audit requirements are linked with Audit schedule A5.2

### **10.3.2 Other External OHSE Audits**

The issuing authority will perform audits against our ISO 45001 and ISO14001 management systems. External Auditors may also be used to conduct internal audits of our management systems.

### **10.3.3 Statutory & Specialist Inspection**

Where there is a legal requirement for external audit, then a competent auditor will be employed.

## **10.4 OHSE Training**

All new employees shall receive basic training in accordance with the TST Induction checklist.

## **10.5 Information on OHSE**

Employees shall be provided with relevant information to enable them to undertake their duties with proper regard to the health and safety of themselves and others.

Such information shall include the risks identified by OHSE assessments, preventative and protective measures, monitoring results and persons with special responsibilities. This includes Aspects and impacts

Company Safety Data Sheets shall be provided for all hazardous substances authorised for use within the Company. Safety Data Sheets shall be made available to all employees via the OHSE dashboard. Materials and substances shall be labelled in accordance with the Registration, Evaluation, Authorisation and restriction of Chemicals Regulations (REACH) and the Classification, Labelling and Packaging Regulations (CLP). Safety information shall be provided to the purchasers of surplus materials and equipment.

Briefings on OHSE shall be a part of the normal communication with all employees.

## 10.6 Safe Systems of Work

So far as is reasonably practicable, all systems of work shall be formulated to ensure the safety and health of employees and others who may be affected.

The risks shall be determined through risk assessments. Where the risk is greater than minimal or there is specific legislation or approved guidance, the system of work shall be documented.

Where work is undertaken which could give rise to significant risks to persons or property, a “permit to work” system shall be used. The arrangements are set out in **SCOP 5 - “Permit to Work Systems”**.

Managers and other supervisory staff must ensure that permits are only raised and worked to by fully competent staff.

## 10.7 Emergency Arrangements

In an emergency on site the usual priority is to first ensure that employees evacuate the premises quickly and safely. The procedure for doing so is given in **SCOP 7 – “Fire and Emergency Evacuation Procedure at TST”**.

## 10.8 Accidents and Statistics

All accidents, dangerous occurrences and near misses shall be reported and appropriately investigated in accordance with the Company Non-Conformance OHSE procedure (OHSE008).

Document can be found on the OHSE dashboard.

Accident statistics shall be created and analysed by TST, in an endeavour to reducing accidents and incidents.

## 10.9 Contractors

Contractors and their personnel must obey all OHSE rules when working for TST.

All contractors shall be issued with **SCOP 22 - the Company HSE Regulations for Contractors** booklet. A Supervising Officer shall be identified to liaise with the Contractor and ensure safe working practices are adhered to.

A Site induction must be completed by all contractors before attending site. More information can be found in OHSE procedure 009.

## 10.10 Visitors

All visitors must be managed as per OHSE Procedure 009.