

HEALTH AND SAFETY AT WORK ACT

B.B. Price Group of Companies, including Harris (Steels) Limited - Health and Safety Policy

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Introduction

This policy outlines the aims, organisation and arrangements for health, safety and wellbeing within our organisation. This policy has been developed in consultation with staff and works representatives to meet legal obligations under the Health and Safety Work Act 1974, the Management of Health and Safety Work Regulations and other statutory requirements. This policy applies to all areas where our organisation's activities are undertaken. The policy has three separate parts that relate to:

Statement of General Policy
Organisation
Arrangements

Separate appendices have been created in support of this policy statement, which provide specific clarification of matters appearing in this statement.

PART 1

Statement of Intent

The B.B. Price Group of Companies recognises, accepts and is committed to providing, as far as is reasonably practicable, the maintaining of a health and safe working environment that promotes the well-being of its employees, visitors, contractors and any other stakeholders who may be affected by our activities. The ultimate responsibility for ensuring the implementation of this policy lies with the directors of the company.

Health and safety contribute to the overall success of the business; it therefore has equal priority with all other aspects of management and will be managed with the same determined commitment. Decisions made by the business will consider any health and safety implications for all our employees and those under our control. We will endeavour to ensure the health and safety of all others who could be foreseeably affected by activities under our control.

The company shall:

- Establish and maintain appropriate management systems to meet the requirements under the Organisation and Arrangements sections of this policy to control health and safety risks within our company.
- Ensure that adequate resources are allocated to establish and maintain the appropriate systems to meet the Organisations and Arrangements sections of this policy to control health and safety risks from the activities that we undertake.
- Take all reasonably practicable steps to safeguard the health, safety and welfare of all persons on the premises.
- Provide adequate working conditions with proper facilities to safeguard the health and safety of personnel and to ensure that any work which is undertaken produces no unnecessary risk to health or safety.
- Encourage persons on the premises to co-operate with the Organisation in all safety matters in the identification of hazards which may exist and the reporting of any condition which may appear dangerous or unsatisfactory.
- Ensure the provision and maintenance of plant, equipment and systems of work that are safe.
- Maintain safe arrangements for the use, handling, storage and transport of materials, articles and substances.
- Provide sufficient information, instruction, training and supervision to enable everyone to avoid hazards and contribute to their own safety and health.
- Provide specific information, instruction, training and supervision to personnel who have particular health and safety responsibilities (e.g. a person appointed as a Health and Safety Officer or Representative).
- Make, as reasonably practicable, safe arrangements for protection against any risk to the health and safety of the general public or other persons that may arise for the Organisation's activities.
- Make a suitable and sufficient assessment of the risks to the health and safety of employees and of persons not in the employment of the Groups/Organisation arising out of or in connection with the Organisation's activities.
- Make a specific assessment of risks in respect of persons considered at higher risk, including people under the age of eighteen.

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- Provide information to other employers of any risks to which those employers' workers on the Organisation's premises may be exposed.
- Have a commitment to progressive improvement of health and safety performance with the objective of creating work practices and working environments that prevent or reduce work-related illness and injury and promote a positive health and safety culture.
- Where accidents, incidents, dangerous occurrences or near misses occur, the company shall be committed to learning from each significant experience and avoiding a blame culture.
- Promote a positive safety culture through the active engagement and positive behaviour of all employees and expect management to set examples for others to follow. Everyone is to be involved with implementing health and safety at any level and should be actively involved in addressing challenging and unsafe behaviour.
- Follow best practice as regards health and safety, and to share this information at all levels within our organisation. Best practice may include reference to and implementation of associated company policies relating to fatigue and behavioural safety approaches as given by the Health and Safety Executive (HSE).
- The company seeks to access competent advice as regards health and safety management, but it must be understood that the implementation of this policy is the responsibility of everybody in our employment or under our control.

This policy statement and associated procedures for its implementation may be altered at any time by the Company's Management. The policy statement shall be reviewed annually in January by the company's health and safety team, and their findings communicated to senior management.

The Statutory Duty of the Organisation

The Group/Organisation will comply with its duty to ensure, as far as is reasonably practicable, the health, safety and welfare at work of its workers and of visitors to its premises and, in general, to:

- Make workplaces safe and without risks to health.
- Ensure plant and machinery are safe, and that safe systems of work are set and followed.
- Ensure articles and substances are moved, stored and used safely.
- Give workers the information, instruction, training and supervision necessary for their health and safety.

In particular, the Organisation will:

- Assess the risks to the health and safety of its workers.
- Make arrangements for implementing the health and safety measures identified as necessary by this assessment.
- Record the significant findings of the risk assessment and the arrangements for health and safety measures.
- Draw up a health and safety policy statement, including the health and safety organisation and arrangements in force and bring it to the attention of its workers.
- Appoint someone competent to assist with health and safety responsibilities.
- Set up emergency procedures.
- Provide adequate First Aid facilities.
- Make sure that the workplace satisfies health, safety and welfare requirements, e.g. for ventilation, temperature, lighting and for sanitary, washing and rest facilities.
- Make sure that work equipment is suitable for its intended use as far as health and safety is concerned, and that it is properly maintained and used.
- Prevent or adequately control exposure to substances that may damage health.
- Take precautions against danger from inflammable or explosive hazards, electrical equipment, noise or electromagnetic fields.
- Avoid hazardous manual handling operations and, where they cannot be avoided, reduce the risk of injury.
- Provide health surveillance as appropriate.
- Provide free any protective clothing or equipment, where risks are not adequately controlled by other means.
- Ensure that appropriate safety signs are provided and maintained.
- Report certain injuries, diseases and dangerous occurrences to the appropriate health and safety enforcing authority.

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The Statutory Duty of the Organisation's Workers

Employees also have legal duties, and the Organisation's confidentiality requests that agency workers also to observe these. They include the following:

- To take reasonable care for their own health and safety, and that of other persons who may be affected by what they do or do not do.
- To cooperate with the Organisation on health and safety.
- To use work items provided by the Organisation correctly, including personal protective equipment, in accordance with training or instructions.
- Not to interfere with or misuse anything provided for health, safety and welfare purposes.
- To report at the earliest opportunity injuries, accidents or dangerous occurrences at work, including those involving the public and participants in activities organised by the Organisation.

Policy for Visitors and Contractors

On arrival, all visitors should be directed to the duty representative of the Management team. This person is to take responsibility for the visitor(s) and assist in their evacuation from the building during an emergency, or arrange help in the event of an accident.

On arrival, all visitors, including contractors and/or their workers, must sign a record of the date and time of their arrival and, before leaving, should further record their time of departure.

Contractors working in the building should report any concerns relating to their own safety or suspected unsafe working practices to the company's Health and Safety Management team, who will investigate and report to the Organisation.

PART TWO

Organisation of Health and Safety

Health and Safety Team and Workplace Representatives.

The Management Committee will appoint a health and safety team to include workplace representatives to representation both of themselves and the staff:

- To have a broad overview of health and safety matters.
- To keep the Organisation's health and safety policy and procedures under review.
- To conduct safety tours of the premises.
- To ensure that risk assessments are carried out, including assessments regarding substances hazardous to health (COSHH regulations).
- To take such action as may be required to ensure that the Organisation's responsibilities for health and safety are fulfilled.
- To report to Senior Management on their performance of these responsibilities.

Contractors working in the building should report any concerns relating to their own safety or suspected unsafe working practices to the Company Management, who will investigate and report to the Organisation.

Safety Tours

The Health and Safety team shall carry out annual tours and inspections of the premises and make a report to the next ordinary meeting of the Management and Health and Safety Management team.

All necessary actions as a result of the tour shall, where reasonable and practicable, be implemented. The tour shall include an inspection of the Accident File.

Health and Safety Rules

All workers must exercise ordinary care to avoid accidents in their activities at work and comply with the following general rules and with any further rules which the Group/Organisation may publish from time to time.

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Accident Forms and Book

The book must be kept in a locked drawer once completed.

An injury suffered by a worker or visitor in the course of employment or otherwise on the Organisation's premises, however slight, must be recorded, together with such other particulars as are required by statutory regulations, on an accident form maintained by the Organisation.

Fire Precautions

All personnel must familiarise themselves with fire escape routes and procedures and follow the directions of the Organisation in relation to fire.

Equipment and Appliances

No equipment or appliance may be used other than as provided by or specifically authorised by or on behalf of the Organisation, and any directions for the use of such must be followed precisely.

Safety Clearways

Factory gangways, corridors and doorways must be kept free of obstruction and properly lit.

Maintenance

Defective equipment, furniture and structures must be reported as such without delay.

Hygiene and Waste Disposal

Facilities for the disposal of waste materials must be kept in a clean and hygienic condition.

Waste must be disposed of in an appropriate manner and in accordance with any special instructions relating to the material concerned and in accordance with waste regulations.

Food Hygiene

When handling or preparing food, there are specific hygiene requirements when using the facilities provided:

- Regularly wash hands before and during food preparation, and especially after using the lavatory.
- Tell your supervisor or representative of the Committee of any skin, nose, throat or bowel problem.
- Ensure cuts or sores are covered with waterproof dressings.
- Keep yourself clean and wear clean clothing.
- Remember that smoking in a room where food is prepared or eaten is illegal.
- Never cough or sneeze over food.
- Clean as you go. Keep all equipment and surfaces clean.
- Prepare raw and cooked food in separate areas. Keep perishable food covered and either refrigerated (less than 8 °C) or piping hot (above 63 °C).
- Ensure waste food is disposed of properly. Keep the lid on the rubbish bin and wash your hands after putting waste in it.
- Avoid handling food as far as possible.
- Tell your supervisor or representative of the Committee of any defects or concerns regarding the facilities – e.g. uncleanness, refrigeration malfunction.

Display Screen Equipment

The Organisation recognises its responsibility to ensure the well-being of workers who habitually use display screen equipment for a significant part of their normal work. Workers are advised to ensure that they take a five-minute break from the display screen equipment at least once an hour and are advised that, if they experience vision defects or other discomfort that they believe may be wholly or in part a consequence of their use of such equipment, they have the right to an eye-test at the Organisation's expense.

Alcohol, Drugs and Tobacco

Smoking within the premises and the use of drugs (except under medical supervision) on the premises are prohibited at all times. The use of intoxicants (alcohol) is prohibited during working hours, and no employee may undertake his/her duties if under the influence of alcohol or drugs (except under medical supervision).

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PART 3

Arrangement and Procedures

The Health and Safety Officer, nominated by Senior Management, is responsible for ensuring that the safety policy is carried out and that responsibilities for safety, health and welfare are properly assigned and accepted at all levels. His/her details and contact number will be displayed on company noticeboards in canteens and communal areas.

First Aid and Accident Reporting

Fire Drills and Evacuation Procedures:

First Aid

- The current First Aider(s) for the premises are displayed on the noticeboard in the reception area and in the site canteens.
- First Aid boxes are provided in the following location(s):
 - 1) Office Reception: Lodgefield Road
 - 2) Office Canteen: Newtown Street, Unit 1, Harris (Steels) Limited
 - 3) Works Office: Harris (Steels) Limited
 - 4) Works Office: Rumbow Works, Harris (Steels) Limited
 - 5) Works Canteen: Unit 1
 - 6) First Aider's Office: Newtown Street
 - 7) Fabrication Shop: Newtown Street
 - 8) Toolroom: Rumbow Works

Accidents

- In the event of an injury or illness, call for a member of staff or ring for an ambulance directly. To call an ambulance – dial 999 and ask for “ambulance”.
- All accidents must be reported to the Health and Safety Officer, your Line Manager or another member of staff on duty immediately or as soon as practicable.
- All accidents must be entered on an accident form, available from the site and works managers. The procedures for “notifiable” accidents, as shown in Appendix A below, must be followed.
- The Health and Safety Officer will investigate incidents and accidents, writing a detailed report for the Organisation’s Management Committee to consider the actions necessary to prevent recurrence.

Fire Drills

- All workers and volunteers must know the fire procedures, position of fire appliances and escape routes.
- The fire alarm points, fire exits and emergency lighting system will be tested by the Fire Officer/Health and Safety Officer during the first week of each month and entered in the logbook provided.
- The Fire Officer will arrange for fire drills and fire prevention checks to be carried out and entered in the logbook.

In the Event of Fire

- Persons discovering a fire should sound the nearest alarm.
- The first duty of all workers is to evacuate all people from the building by the nearest exit immediately the fire is discovered.
- All persons must evacuate the building and, where possible, without personal risk, leave all doors and windows closed.
- The assembly point for each site is as follows:
 - 1) Unit 1: Factory frontage right of the factory
 - 2) Newtown Street Factory: Yard by entrance gates
 - 3) Newtown Street Office: Office car park
 - 4) Rumbow Works: Car park entrance
 - 5) Lodgefield Road: Front of office (car park)
 - 6) Harris (Steels) Limited: Yard, front of buildings

- No one should leave the assembly point without the permission of a member of staff.
- For fires that are not immediately controlled, call the fire brigade immediately by dialling 999 and asking for "fire".
- When the fire brigade arrives, advise whether all persons are accounted for and the location of the fire.

General Machinery and High-Risk Areas

- All machinery and portable machinery must be switched off and unplugged when not in use.
- Wandering cables are a hazard; use with caution and safety in mind.
- Slippery floors are dangerous; use warning signs.
- Use protective clothing and equipment provided and as instructed on machinery/equipment/material. It is the duty of a worker to report any loss or defect in protective clothing or equipment.

General

- All thoroughfares, exits and gates must be left clear at all times.
- Corridors and fire exits must not be blocked by equipment, work bins, pallets or other obstructions.
- Vehicles must not be parked near to the building so as to cause any obstruction or hazard.
- Hazards or suspected hazards or other health and safety matters should be reported to the Health and Safety Officer, Line Managers immediately or as soon as practicable, so that action can be taken. If the hazard is of a serious nature, immediate action must be taken to protect or clear the area to prevent injury to staff or other users.

APPENDICES TO THE HEALTH AND SAFETY AT WORK ACT

B.B. Price Group of Companies, including Harris (Steels) Limited - Appendices to the Health and Safety Policy

APPENDIX A - ACCIDENT REPORTING

1. Accidents

All accidents which occur during work for the Group/Organisation and/or for the User/Hirer, or on premises under the control of the Group/Organisation must be recorded.

2. Accidents to Workers or Contractors' Staff

a) For ALL Accidents

Complete the Accident Form and give it to the Health and Safety Officer urgently.

b) **For accidents reportable to the Health and Safety Executive** (for contractors see c)

If the accident results in incapacity for work for more than 7 calendar days, then complete online form F2508 with copies to the Directors and the Health and Safety Team.

If the accident results in fatality, fracture, amputation or other specified injury (see section 4, below), then **immediately notify:**

Health and Safety Executive on HSE's Infoline Tel: 0845 345 0055 and Company Directors.

Follow up within seven days with the completed online form F2508 with copies to the Directors and Health and Safety Team.

c) If a reportable accident involves a contractor's employee and the premises are under the control of someone other than the contractor, then the person in control of the premises is responsible for reporting the accident.

If a contractor's employee is at work on premises under the control of the contractor, then it is the contractor or someone acting on his/her behalf who is responsible for reporting the accident.

3. Accidents to Members of the Public

a) For ALL Accidents

Complete the Accident Form and give it to the Health and Safety Officer

b) For accidents reportable to the Health and Safety Executive

If an accident results in fatality, fracture, amputation or other specified injury (see section 4 below), then **immediately notify:**

- i. Health and Safety Executive
- ii. Incident Contact Centre
- iii. Caerphilly Business Park
- iv. Caerphilly
- v. CF83 3GG
- vi. And the Chair of the Management Committee

Some injuries may not be fully identified until the casualty has been taken to the hospital. It is therefore essential that, if it is known that an individual has gone to the hospital as a result of an accident, follow-up action is carried out.

4. Definition of Specified Major Injuries or Conditions

- Fracture of the skull, spine or pelvis, any bone in the arm or wrist, but not a bone in the hand, any bone in the leg or ankles, but not a bone in the foot.
- Amputation of a hand or foot, a finger, thumb or toe, any part thereof if the joint or bone is completely severed.
- Other specified injuries and conditions:
 - The loss of sight of an eye, a penetrating injury to the eye, or a chemical or hot burn to an eye
 - Injury (including burns), either requiring immediate medical treatment or involving loss of consciousness, resulting (in either case) from electric shock from any electrical circuit or equipment, whether or not due to direct contact.
 - Loss of consciousness resulting from a lack of oxygen
 - Decompression sickness requiring medical treatment
 - Either acute illness requiring treatment or loss of consciousness, resulting (in either case) from absorption of any substance by inhalation, ingestion or through the skin
 - Acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a pathogen or infected material
 - Any other injury which results in the person injured being admitted immediately to the hospital for more than 24 hours.

IF IN DOUBT, REPORT IT

5. Dangerous Occurrences

- Overturning of a forklift truck
- Explosion/damage of a closed vessel/cylinder
- Electrical explosion/fire

Notify the following immediately:

The Health and Safety Team, who will notify the:

Health and Safety Executive
Incident Contact Centre
Caerphilly Business Park
Caerphilly
CF83 3GG
HSE's Infoline Tel: 0845 345 0055
Email: hse.infoline@natbrit.com

6. Occupational Diseases

- Poisoning
- Skin Diseases
- Lung Diseases
- Infections

On receipt of a written diagnosis from a Doctor, report the disease using online form F2508A to hse.infoline@natbrit.com **and** the Chair of the Management Committee.

Full details of Dangerous Occurrences and Occupational Diseases can be found in HSE RIDDOR booklets 11 and 17.

IF IN DOUBT, REPORT IT

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APPENDIX B - CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH REGULATIONS)

1. Assessment

The assessment must be a systematic review

What substances are present and in what form

What harmful effects are possible

Where and how are the substances actually used or handled

What harmful effects are given off, etc

Who could be affected, to what extent and for how long

Under what circumstances

How likely is it that exposure will happen

What precautions need to be taken to comply with the COSHH Regulations

What procedures need to be put in place to comply with the Control of Asbestos at Work Regulations 2002

2. Prevention or Control

Employers have to ensure that the exposure of workers to hazardous substances is PREVENTED or, if this is not reasonably practicable, ADEQUATELY CONTROLLED.

On the basis of the assessment, the employer has to decide which control measures are appropriate to the work situation in order to deal effectively with any hazardous substances that may be present. This may mean PREVENTING exposure by

- Removing the hazardous substance by changing the process
- Substituting with a safe or safer substance, or using a safer form

Or here, this is not reasonably practicable, CONTROLLING exposure by

- Totally enclosing the process
- Using partial enclosure and extraction equipment
- General ventilation
- Using safe systems of work and handling procedures

The employer shall choose the method of controlling the exposure and to examine and test control measures, if required.

The Regulations limit the use of Personal Protective Equipment (e.g. dust masks, respirators, protective clothing) as the means of protection of those situations ONLY where other measures cannot adequately control exposure.

Employers must provide any of their workers and, so far as is reasonably practicable, other persons on site who may be exposed to substances hazardous to health, with suitable and sufficient information, instruction and training so that they know the risks they run and the precautions they must take.

Employers must ensure that anyone who carries out any task in connection with their duties under COSHH has sufficient information, instruction and training to do the job properly.

APPENDIX C - FIRE PREVENTION

1. The Company Shall Maintain

- The number and width of escape routes so as to provide a ready means of escape from all parts of the premises
- Emergency lighting and its maintenance
- The most suitable way of raising an alarm in the event of fire
- The contents of fire instruction notices
- The numbers and types of fire extinguishers or other firefighting appliances which should be provided
- Precautions to be taken with any activities involving the use of flammable liquids, naked flames or heating processes
- Gangways to be so arranged as to allow free and easy access, direct to the fire exits
- Exit doors are always unlocked before the start of any session and kept unlocked until the last person leaves.
- Escape routes and exit doors are clearly signposted and marked so that anyone not familiar with the building can quickly see the way out.
- Escape routes and exit doors are never allowed to become obstructed.

2. Fire Equipment Shall Be Maintained in Safe Working Order Including:

- Fire extinguishers and fire alarm systems (where provided), which shall be regularly maintained by specialist fire engineering firms
- Staff/duty officers trained to use this equipment
- Equipment is kept in its proper position and is always clearly visible and unobstructed

3. All reasonable steps have been taken to prevent fires:

- Smoking is allowed only in designated areas outside
- Substantial ashtrays are provided in areas where smoking is permitted
- If portable heaters have to be used, they are kept away from combustible materials
- Precautions to ensure that convector-type heaters are not covered
- Electrical installation carried out and checked by a competent electrician
- Sufficient socket outlets are provided to obviate the need for long trailing flexes
- Damaged leads are replaced regularly
- All parts of the premises are kept clear of waste and rubbish, particularly staircases, space under stairs, storerooms and boiler rooms.

APPENDIX D - HEALTH AND SAFETY INSPECTION

1. Inspection

- A Health and Safety inspection of the building should be undertaken at least annually.
- Member(s) of the Health and Safety team to carry out the inspection
- When the inspection is complete and has been signed, matters noted as not satisfactory, together with any other concerns raised by the inspection, should be reported to the Health and Safety Team
- **The Health and Safety Team should be authorised, where URGENT action is necessary to make an immediate, reasonable response**
- The whole form should be made available to members of the Company Management
- The forms should be preserved in a file maintained for this purpose. As required action is taken, the responsible person should initial the form to confirm completion of corrective actions.

2. Risk Assessment

- Risk assessments relate to activities within the premises or grounds
- Risk assessments NEEDS to be carried out in relation to every activity undertaken by the Health and Safety Team
- Special attention should be paid to the circumstances of workers under the age of eighteen and to expectant mothers, women who have given birth within the past six months or who are breastfeeding
- A risk assessment needs to be carried out whenever a new activity is envisaged
- Assessments need to be repeated whenever circumstances change
- Changes in the layout of equipment
- Observing trends from accident forms
- Changes in staff
- Introduction of new procedures, processes or materials

APPENDIX E - DISPLAY SCREEN EQUIPMENT

1. The regulations are for the protection of workers who habitually use display screen equipment for a significant part of their normal work.

In some cases, it will be clear that the use of Display Screen Equipment is more or less continuous on most days, and the individual concerned should be regarded as a user. Where use is less continuous 'user' status would apply if most or all of the following criteria are met:

- The individual depends on the use of display screen equipment to do the job, as alternative means are not readily available for achieving the same results
- The individual has no discretion as to the use or non-use of the display screen equipment
- The individual needs significant training and/or particular skills in the use of display screen equipment to do the job
- The individual uses display screen equipment in this way, more or less daily
- Fast transfer of information between the user and the screen is an important requirement of the job
- The performance requirements of the system demand high levels of attention and concentration by the user, for example, where the consequences of error may be critical.

2. Workers Entitlement

2.1 Eye Test

Any worker covered by the Regulations is entitled to request an eye and eyesight test which will be paid for by the employer. Workers should inform their line manager, who will provide them with the forms to take to an optician of the worker's choice.

A worker may request a test if he/she:

- Is already a user for a significant part of his/her work
- Is about to start using display screen equipment for a significant part of his/her work
- Is experiencing visual difficulties, which may reasonably be considered to be related to display screen work
- It is recommended by an optician that, at the time of an eye examination, the worker should have eye tests at regular intervals.

2.2 Spectacles

If, as a result of the eye test, a worker requires spectacles solely for use with display screen equipment, he/she is entitled to reimbursement of the cost of a basic pair. If the worker wishes to choose more costly spectacles (e.g. a more expensive frame), the employer is not obliged to pay the full cost of these. In this event, the worker will only be reimbursed for the cost of basic spectacles.

If, as a result of the tests, spectacles are required for normal use, e.g. reading or distance vision, but which may also include display screen equipment use, under the Regulations, the employer is not required to make reimbursement beyond the cost of the eyesight test and the report.

2.3 Who pays the Optician

The worker pays the optician and then obtains the reimbursement, attaching the receipt(s) and any report to the form DSE1, and gives these to his/her Line Manager.

We request that our Staff and Visitors respect this Policy, a copy of which will be available on demand.

Approved by the Company Management

SIGNED: 

Managing Director

DATE: **05 January 2026**