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HEALTH AND SAFETY FOR VISITORS/CONTRACTORS

GENERAL STATEMENT

It is our policy to do all that is reasonably practicable to protect the health and safety of all visitors and contractors, to this end we have developed additional criteria specific to non-employees while on GPS premises. The term 'visitor' when stated also includes 'contractors'.

The GPS Health & Safety Statement, Ethics Policy and Bribery Policy which are relevant to our staff will also be applicable to visitors and should be read as part of this policy.

LEGAL POSITION

The Health and Safety at Work (NI) Order 1978, places a duty on employers to ensure the health, safety and welfare of anyone who may be affected by the work being carried out. This duty extends to visitors.

The Occupiers Liability Acts 1957 and 1984 impose a duty of care to ensure visitors (including unlawful visitors) are reasonably safe whilst on the premises. Under the Management of Health and Safety at Work Regulations (NI) 2006, we are also required to provide safety information to all those who require it, including visitors. In addition, these regulations require risk assessments to cover all persons affected by any hazard and any risks which are likely to be created. No element in this document absolves contractors from their legal duty to comply with all current legislation.

VISITOR ACCESS

Visitor access, during normal office hours (9am-5pm), is via the main entrance at the front of the building - please use intercom at inner door for attention. Out of hours access is via the Staff Entrance located at the right hand side of the building adjacent to the car park by ringing 07973 743 493 or 07929 053 812. If the gates are closed please press the intercom for attention.

VISITOR PASS

If your visit involves access to areas other than the main reception area you will be issued with an authorised visitor pass which you are required to wear at all times during your visit – this is for identification and health and safety purposes. Visitors will normally be accompanied by a member of staff, but where this is not the case, in the event of an emergency, visitors should follow the emergency procedures set out in this document.

GOODS IN/OUT - ALL DRIVERS

The goods in/out gate opens between 6.45am and 5.30pm. Out of hours please use the intercom on the main gate for attention. Carriers visiting the premises should follow the instructions on the large sign displayed on the wall of the goods in/out yard area. As instructed on this sign you may gain assistance by using the intercom located at the top of Driver Pedestrian Entrance or by calling the telephone number displayed. Appropriate protective clothing and footwear must be worn.

Vehicles must **not** be driven into the building interior through any access point.

Vehicles 7.5 tonne or over must **not** be driven into the tarmacked carpark and are not permitted in this area.

The speed limit is **5 mph** on the GPS premises.

If you require further assistance regarding access, please ring **07973 743 493** or **07929 053 812**.



VISITOR FIRE EVACUATION PROCEDURE

In the event of the alarm sounding, the visitor's host must escort them to the assembly point. If the visitor is not accompanied by a staff member, the visitor is expected to follow the direction of other staff. No member of staff should travel further into the building in order to look for a visitor.

The assembly point area is located in the yard, adjacent to the Marshalls Road perimeter fence at the front of the building - the assembly points are clearly signposted.

GENERAL ARRANGEMENTS FOR THE PROTECTION OF VISITORS

So far as is reasonably practicable, routes and areas of the premises used by visitors are in a safe condition.

Our risk assessments take into account all those who may be exposed to hazards in our workplace, including visitors. Any hazards/hazardous locations are marked with suitable warning signs and hazard information is provided if necessary. Staff are expected to take responsibility for their visitors and to notify reception if they consider anyone to be an unauthorised visitor.

RISK ASSESSMENT AND CONTROL

When we undertake general risk assessments of our work activities we take into account the risks to individuals, including visitors. We also ensure that risks which are likely to be introduced by visitors are included.

Our fire safety risk assessment also takes into account the numbers and types of visitors we are likely to have on site at any one time.

Warning signs are displayed where visitors need to be forewarned of particular hazards or safety requirements.

Our risk assessments have determined that visitors will be provided with and required to wear hearing protection when exposed to noise in the production areas for more than 30 minutes. Hearing protection is available from the dispensers located in the main corridor at the entrances to the main production areas.

FIRST AID AND ACCIDENTS INVOLVING VISITORS

The Company maintains first aid facilities and employees trained in first aid are available on site.

In the event of an accident involving a visitor, first aid will be administered in the first instance by one of our trained first aiders. Accidents and near misses involving visitors must be reported promptly to the Health & Safety Officer who will investigate in the same way as incidents affecting our own employees.

Accidents which are caused by the design of our premises or the way in which we work, may be reportable under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR).

Records will be kept of all investigations, communications and remedial action taken.



ADDITIONAL HEALTH & SAFETY RULES/PROCEDURES FOR CONTRACTORS

Before any work can commence, the contractor must submit a Health & Safety Risk Assessment and Method Statement which must be approved by GPS senior management.

Contractors must ensure that all operatives are competent for the requirements of their work including proficiency in the English language so far as is necessary to ensure their safety and that of those around them.

Contractors must ensure that copies of the risk assessment are issued to all relevant operatives and any other party affected by the activities. A copy of each assessment must be given to the GPS contact or GPS Health & Safety Officer. Any instruction and necessary training must be delivered before work commences and a copy of all relevant certificates must be provided on request.

Ensure that you follow all control measures required by the risk assessments and/or agreed written method statements/safe working procedures.

Please pay particular attention to the following:-

Loading Bay

Couriers collecting from or delivering to GPS should have had appropriate training, operate in a safe manner and be able to carry out a safety risk assessment prior to entering our property.

They must never use unsafe working practices when delivering to or collecting from our loading bay – an example of this would be to climb up or jump off the loading bay.

GPS can have no liability if a driver was to injury himself/herself on our property through carrying out unsafe work practices.

Asbestos

The main roof is manufactured from asbestos cement - all other asbestos containing materials were removed during the recent major refurbishment.

GPS is committed to protecting all staff and visitors to its premises from exposure to asbestos fibres. The Asbestos Policy and Statement of Intent, has been prepared to mitigate hazards as required by law. The remaining asbestos containing material, on the main roof, will be regularly monitored to ensure it remains in satisfactory condition.

GPS accepts that risks to health can be presented by exposure to airborne asbestos fibres, and will take all reasonable measures to minimise those risks, as should all contractors working on site. An asbestos survey has been completed and is available for inspection by interested parties. An Asbestos Management Plan has also been prepared which includes records of periodic inspections.

Anyone contracted to perform any type of work at or near the roof is required to read the 'GPS Asbestos Register' and sign that they have read and understood by completing the 'Register Inspection Confirmation' sheet.

Working areas

Work only in your agreed, designated area and only carry out operations related to your particular task. Inspect the working area for potential hazards at the start and finish of the task and report any findings to your supervisor or your contact at GPS before commencing work.

Equipment

Do not remove any existing barriers or guards without prior agreement. Do not use makeshift tools or equipment. Do not use or operate any machinery or vehicles unless trained and authorised to do so. Ensure all equipment is inspected, maintained and certificated as required by current legislation. Do not leave any plant, machinery or substances in a dangerous condition. Always transport equipment/materials in a safe and secure manner along agreed routes. Where required for the task, wear/use all protective equipment in the correct manner.



Working at height

No work may be carried out above anybody's head until precautions have been implemented to ensure the safety of persons or property below. All scaffolding/mobile towers must be erected/ altered only by trained and competent persons. Ladders must be regarded as for access use to places of work and the 'three point contact' rule must be applied. Ladders must be stable, properly secured and/or footed and be free from defects. On no account must contractors use GPS ladders.

Barriers

Ensure that barriers and safety signs are placed around the working areas where appropriate and that they are removed upon completion of the work.

Electricity

All electrical equipment is to be suitably tested and all electrical work is to be carried out in accordance with the requirements of the Electricity at Work Regulations 1989. You must not carry out any electrical isolation or reinstatement of mains supplies without prior agreement from your contact or their authorised representative. Isolation of services must be detailed on the method statement prior to work commencing. Where practicable, all electrical hand tools should be of 110v or of the portable, cordless type.

Permit to work/access

Certain processes/jobs will require written permits before proceeding. Such requirements should be identified prior to work commencing by the contractor. Safety precautions and procedures must be fully explained before work begins. The permit must be in the possession of the person in charge of the operation before the work can commence.

Hot Work

(Cutting, Welding, Soldering, Brazing and use of equipment producing heat or naked flame) NOT to be undertaken without a 'Hot Work Permit to Work'. Do not commence hot work without first ensuring the authorised isolation of heat or smoke detectors in the immediate areas. Ensure there are no flammable liquids, gases or materials likely to be ignited through hot work and that there is adequate ventilation and appropriate firefighting appliances near to hand. See 'permit to work' for full requirements.

Housekeeping

Keep all gangways, corridors, access and exits clear. Do not block fire exits. Never use fire extinguishers as door stops. Do not allow rubbish to accumulate. Rubbish and waste is to be properly bagged prior to removal from site. It is the contractor's responsibility to ensure all rubbish and waste is cleared from site and disposed of in accordance with current legislation.

Hazardous Substances

Contractors must not bring on to the site any hazardous substances or highly flammable materials until a COSHH assessment has been completed and the place of use, method of work and storage has been agreed by the GPS contact or H&S Officer. All containers must have the correct symbol and instructions clearly visible. Substances must not be decanted into containers that are unmarked or normally used for food and drink.

Accidents and First Aid

All accidents and injuries to any contractor must be reported to the GPS contact. Where appropriate, GPS will provide first aid facilities for contract staff. The names and locations of first aiders are displayed on notice boards around the site.

Fire and Emergency Procedures

In the event of a fire the fire alarm will sound. The fire alarm system is tested on a regular basis and you will be informed on your arrival if there is an alarm test that day. Do not remove or obstruct fire-fighting appliances or other emergency equipment. Fire extinguishers MUST NOT be used as door stops.

Action on hearing the Fire Alarm:

- Stop what you are doing and switch off any equipment if it is safe to do so.
- Leave the building by the nearest exit.
- Do not stop to collect personal belongings, equipment etc.
- Do not re-enter the building.
- Go immediately to the fire assembly point and report to the Fire Warden.
- Inform senior person if you suspect anyone missing.



Protective Clothing

Contractors will provide and ensure that their employees wear any protective clothing or equipment necessary. Contractors will not use any equipment belonging to GPS without first getting permission from the Health & Safety Officer.

Training

Contractors will ensure that their employees are adequately trained, equipped and are competent to work on the GPS site.

Contractors Plant and Equipment

Contractors will ensure that all plant, equipment and machinery brought on to these premises are safe and have been properly maintained to a standard which will not constitute an offence under any relevant statutory provision.

Smoking

Due to the risk to Health & Safety of all employees and in accordance with current legislation the Company operates a strict 'No Smoking Policy' on its' premises.

This policy extends to the use of electronic cigarettes.

General

Obey all safety signs, notices and instructions (verbal and written). All visitors are to treat the building, facilities and furniture with respect. Canteen facilities may be used by contractors. Toilets and washing facilities are available - these facilities are shared with the Company's employees and are to be kept clean and tidy and are not to be abused.

The contractor is to ensure the good conduct of its employees throughout the duration of their visit to GPS. All contractors are to behave in a reasonable manner at all times. All dress is to be neat and tidy in line with the type of work being undertaken. Contractors are not allowed to be under the influence of alcohol whilst on GPS's premises.

HEALTH & SAFETY STATEMENT

Health and Safety of employees and others on our site is of paramount importance at GPS. In response to this, the company has developed a Health & Safety Management System to meet the requirements of OHSAS 18001.

The company accepts all responsibilities toward Health & Safety for employees and others who may be affected by our activities.

The company will endeavour to 'at least' comply with current applicable occupational Health and Safety legislation and other requirements.

Every opportunity will be provided to employees to discuss matters affecting Health and Safety. All employees will be given the appropriate information, instruction and training to carry out their duties with due regard to their own and other's Health and Safety.

All employees will be made aware of their Health and Safety obligations and will be expected to co-operate with all arrangements for Health and Safety.

The company will strive to achieve year on year improvement in Health and Safety performance. Health and Safety Objectives & Targets within the Management Programme will set the framework for achieving this.

This statement can be read in conjunction with the Management Systems Manual that outlines organisation responsibilities and detailed arrangements, commensurate with the recommendations of the Health & Safety at Work (NI) Order.

This statement and the full 'Health & Safety Policy' will be made available to all interested parties on request.



ETHICS POLICY

PURPOSE

GPS is committed to the practice of responsible corporate behaviour. Through its business practices GPS seeks to protect and promote the human rights and basic freedoms of all its employees and agents. Furthermore the company is committed to protecting the rights of all of those whose work contributes to the success of the business including those employees and agents of suppliers to the company.

GPS is also committed to eliminating bribery and corruption. It is essential that all employees and persons associated with GPS adhere to this policy and abstain from giving or receiving bribes of any form. More detailed information on this subject is provided in the anti-bribery policy.

This ethics policy is non-exhaustive, and all aspects of GPS's business should be considered in the spirit of this policy.

HUMAN RIGHTS

GPS is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.

The company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.

GPS will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its employees or who breach the human rights of those affected by the organisation's activities.

EMPLOYEES RIGHTS

GPS is committed to complying with all relevant employment legislation and regulations. The company regards such regulations and legislation as the minimum rather than the recommended standard.

No employee should be discriminated against on the basis of age, gender, race, sexual orientation, religion or beliefs, gender reassignment, marital status or pregnancy. All employees should be treated equally. Employees with the same experience and qualifications should receive equal pay for equal work.

No employee should be prevented from joining or forming a staff association or trade union, nor should any employee suffer any detriment as a result of joining, or failing to join, any such organisation.

Employees should be aware of the terms and conditions of their employment or engagement from the outset. In particular, employees must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Employees should also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum.

GPS does not accept any corporal punishment, harassment in any form, or bullying in any form.

ENVIRONMENTAL ISSUES

GPS is committed to keeping the environmental impact of its activities to a minimum and has established an environmental policy in order to help achieve this aim. Please see Environmental Policy and Chain of Custody Policy.

As an absolute minimum, GPS will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.



CONFLICTS OF INTEREST

GPS holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the business with its partners.

In order to help preserve and strengthen these relationships GPS has developed an Anti-Bribery Policy which provides rules and guidelines concerning the conduct of its managers and employees aimed at minimising the possibility of conflicts of interest and at avoiding risks associated with bribery and corruption.

All managers, employees and representatives of GPS are expected to act honestly and within the law.

INFORMATION AND CONFIDENTIALITY

Information received by employees, contractors or agents of GPS will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.

The company will at all times ensure that it complies with all applicable requirements of data protection legislation (including, but not limited to, the Data Protection Act 1998) in force from time to time.

SUPPLIERS AND PARTNERS

GPS expects all suppliers and partners to work towards and uphold similar ethical and moral standards.

Further, GPS reserves the right to request information from suppliers regarding the production and sources of goods supplied.

The company reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this ethics policy.

BRIBERY AND CORRUPTION

GPS is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.

Employees and any other persons associated with the company such as agents, subsidiaries and business partners are not permitted to either offer or receive any type of bribe and/or facilitation payment.

All employees are encouraged to report any suspicion of corruption or bribery within the company in accordance with the GPS whistleblowing policy and/or the anti-bribery policy.

Should any employee or associated person be in doubt when receiving or issuing gifts and hospitality, he/she must refer to the GPS Anti-Bribery Policy for guidance.

GPS endeavours to implement the guidance principles on bribery management that are published, from time to time, by the Secretary of State in accordance with Section 9 of the Bribery Act 2010.

If an employee or associated person is found guilty of giving or receiving a bribe, he/she will be personally criminally liable and may be subject to disciplinary action.

Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.



ANTI-BRIBERY POLICY

INTRODUCTION

GPS is determined to maintain its strong and well respected commercial reputation and is committed to protecting its heritage as a printing company that can be trusted through the implementation of an anti-bribery policy. This policy complies with the anti-bribery legislation which was introduced into UK law in July 2011 and is aimed at ensuring an anti-corruption environment within the commercial arena.

PURPOSE AND SCOPE

This policy applies to all permanent staff plus all agency, temporary and casual employees as well as suppliers, customers and any third party involved in any commercial dealings with GPS such as subcontractors etc. The purpose of this policy is to provide guidance and clarification on what is appropriate business activity and how to avoid and / or recognise bribery or corruption and what to do in those circumstances.

BRIBERY

A bribe is an inducement, offer of money or some other benefit designed to gain commercial, contractual or employment advantage. GPS expressly prohibits this kind of activity and will not tolerate any form of inducement being offered to or by any of its employees, suppliers, customers, sub-contractors etc in order to gain personal, commercial or contractual gain.

RESPONSIBILITY

It is the responsibility of GPS staff, customers, suppliers, sub contractors or any third party connected to the business etc to:

- Ensure that this policy is made available to everyone connected to the business and that the policy is understood and complied with.
- Detect, prevent, and report any suspected acts of bribery or corruption.
- Comply with and adhere strictly to all established processes and procedures connected to GPS business transactions.

Employees, suppliers and customers are asked to inform GPS's Chairperson immediately if they suspect or become aware of any activity which has or may occur in the future which may result in a breach or potential breach of this policy.

BREACH OF POLICY

GPS's disciplinary procedure will be invoked if there is any reported/alleged or identified breach of this policy by a member of GPS staff. The outcome of any disciplinary which involves and proves that corruption of any form has taken place by a member of staff may result in summary dismissal.

Any reported attempt from a GPS employee of corrupt activity by a third party will be taken very seriously and will be thoroughly investigated possibly resulting in a cessation of business with the alleged party.

INTERNAL CONTROLS

GPS will continue to ensure that all processes and procedures are accurately maintained and will record all evidence of any financial activity involving outgoing and incoming payments/services. All accounts, invoices, delivery notes, job dockets etc will be prepared and maintained accurately and will be subject to ad hoc and annual audit checks.



GIFTS, HOSPITALITY AND EXPENSES

GPS prohibits the giving, the offering, the solicitation or the acceptance of any cash, gifts, hospitality or expenses or other inducement or favours to or from any public or government body or official, company or business or private individual. This includes activity conducted by GPS or other employees, agents, subcontractors or any other business or individual acting on behalf of the business with the intention of acquiring contractual or commercial gain for the company or for personal gain of the individual involved. Any such activity, if proved, will be considered by GPS as an act of bribery which contravenes this policy.

However, GPS recognises that there may be occasions when it is appropriate to maintain good relationships with customers and suppliers. This policy does not prevent the normal provision or receiving of normal and appropriate hospitality or token/good will gifts at corporate events and for promotional, PR and marketing purposes.

MONITORING

It is the responsibility of the Company Accountant to ensure this policy is regularly reviewed and updated in line with any changes to anti-bribery legislation and that all relevant parties are advised accordingly.

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