

Health & Safety and Environmental Policy

This policy details arrangements for the management of Health & Safety and Environmental risks across APC Technology Group and its subsidiary companies (the “Group” or “Company”). The Group provides a range of technologies and services to clients to improve organisational sustainability and operational performance and distributes specialist electronic components. In the course of its undertakings, the Group carries out its work using predominantly in-house resources but also make use of subcontracted staff.

The Group will take all reasonable steps to ensure that its activities do not place the Health & Safety of its employees, sub-contractors or any third parties at risk. Furthermore, the Group will take all reasonable steps to ensure that its activities do not cause harm to the Environment and meet the regulations pertaining. The Group acknowledges its obligations in all cases, including residual liability where sub-contractors or third parties are employed and will use due diligence to ensure that they adhere to our standards.

This policy document is intended to detail where accountability and ownership lie in the management of Health & Safety and Environmental risks across the Company. It is also intended to explain the organisation of resources to meet Health & Safety and Environmental management responsibilities and also the arrangements in place to implement the policy. This policy is to be viewed as a key pillar of the Group’s corporate strategy.

Commitment

As the senior company executive responsible for Health & Safety and Environmental management, I affirm that it is our policy to ensure the Health & Safety of all our employees while at work; in addition, we accept that we have a duty of care to employees of our sub-contractors, as well as to our clients’ staff and to any other persons who may be affected by our work activities such as members of the public. It is also our policy to fully comply with all applicable legal requirements and with all other requirements to which we subscribe, which relate to our Health & Safety and Environmental risks. Furthermore, we undertake to influence, as far as reasonably practicable, the legal compliance of our clients with respect to Health & Safety and Environmental regulations. Our employees, sub-contractors and consultants are to use the utmost due diligence to achieve compliance.

I require the Company to share my commitment by:

- raising Health & Safety and Environmental quality standards reducing workplace risks;
- reducing the carbon footprint of our activities preventing pollution;
- increasing the sustainability of our operations; and,
- following a process of continual improvement in managing the Health & Safety and Environmental risks of our business.

Health & Safety and Environmental risk management is to be viewed as an integral function of our business risk management activities and will be resourced adequately. An Integrated Risk Management System (covering Health & Safety and Environmental risks) will be established to meet our needs, and all staff, whether all employees, or sub-contractors must co-operate fully in raising standards of risk management performance.

Health & Safety and Environmental Strategy/Key Risk Management Objectives

Our Health & Safety and Environmental Strategy is to manage the health & safety risks and environmental impacts inherent in our business and, through a process of continual improvement, raise our standard of performance.

Our Key Risk Management Objectives are:

- To ensure compliance with applicable legal requirements and with all other requirements to which the Group subscribes;
- To manage the Health & Safety and Environmental aspects of our activities, setting targets as appropriate;
- To regularly review the Group Health & Safety and Environmental performance and monitor progress towards our objectives;
- To maintain effective Health & Safety and Environmental management system, maintain safe and healthy working conditions, maintain safe plant and equipment, work to safe methods and procedures and ensure the provision of safe materials
- To reduce energy consumption; to reduce the amount of waste at source and increase the percentage recycled; to conserve water supplies
- To develop the Health & Safety and Environmental skills base in order to achieve a culture of continual improvement
- To procure goods and services from suppliers and sub-contractors who share our vision of responsibility and sustainability; and,
- To influence our clients in the adoption of safer, healthier and more sustainable approaches to their business
- To adapt and safely operate, as far as is reasonably practicable, in the new Coronavirus environment.

Organisation and Key Responsibilities

As Chief Executive of the Group, I am ultimately responsible for all Health & Safety and Environmental management matters within the Company. The Company Board of Directors has appointed the Chief Financial Officer as Board representative with specific responsibility for Health & Safety and Environmental management at a strategic level. Health & Safety and Environmental responsibilities and authority are delegated to the Divisional Directors, Operations Managers & Line Managers of each Company subsidiary for the work streams under their control. A Group Health & Safety and Environmental Committee has been established across the Company to monitor the implementation of this policy and its Integration across the Company.

The Board has appointed an internal Health & Safety team to advise on the content, execution and review of this policy. This role is also responsible for monitoring the integration of Company and subsidiary policies; developing the overall Health & Safety Risk Management System; monitoring Health & Safety and Environmental performance; maintaining the system for Health & Safety and Environmental assessment; developing the training strategy; audit of the Risk Management System; and, review to confirm its appropriateness to the Business.

Day to day responsibilities for Health & Safety and Environmental management rests with each employee, sub-contractor, or any other representative of the Group. These responsibilities follow the line management structure. I hold each Manager responsible for the Health & Safety and Environmental management arrangements within their department. Each manager is to ensure that local policy and procedure is congruent with the requirements of this policy document and our Risk Management System implementation and monitoring of the practical application of Health & Safety and Environmental management practices and procedures is a fundamental responsibility of each manager. Our duty of care requires Managers, Supervisors, Employees and Sub-Contractors to take ownership of potential risks and implement appropriate remedial action

Position	Responsibilities
Chief Executive Officer	Ultimate responsibility for Health & Safety and Environmental management arrangements
Director of Group Operations	Board representative responsible for Health & Safety and Environmental matters. To present relevant Health & Safety and Environmental matters to the Board of Directors at regular intervals
Group Compliance Manager	Responsibility for implementing this policy, completing reviews annually and upon any changes. Developing and driving strategies to ensure continual performance improvement. Chair of Company Environment, Health and Safety Committee. Responsible for monitoring health, safety and environmental performance across their operations and for reporting results against agreed KPIs. Ensure that their business units are represented on the Company Environment, Safety and Health Committee
Human Resources Manager	Responsible for identifying, implementing and enforcing training requirements for employees in order to comply with legislation and health, safety and welfare policies and procedures and maintaining related health and safety documentation. Ensuring that all staff and Contractors have relevant training and are aware of their responsibilities within the APC Group Health & Safety Policy
Managers and Supervisors	Responsible for implementing and enforcing the Health & Safety and Environmental policies and procedures. Ensuring that all staff and Contractors under their control receive relevant training and are aware of their responsibilities within the Group Health & Safety and Environmental policy. Leading by example in protecting the workforce and ensuring the health & safety of persons at all times
Employees	Carry out their work activities in line with company procedures and policies, completing risk assessment activities, develop safe systems and work in accordance with them. To communicate any issues of concern including breakdown of procedure relating to Health & Safety and Environment to their Line Manager immediately. To co-operate fully with clients' risk management arrangements and site-specific requirements.

Sub-contractors	Provide suitable and sufficient risk assessments and Method Statements for work activities, develop safe systems and work in accordance with them. To work safely at all times and communicate issues of concern with regard to Health, Safety and the Environment. To co-operate fully with both APC Technology Group plc and its client's risk management arrangements and site-specific requirements.
Health & Safety and Environmental Committee and Representatives	Responsible for attending Health & Safety and Environmental Committee on a monthly basis, communicating matters identified and consulting with all employees. Leading by example in protecting the workforce and ensuring the Health & Safety of persons at all times

Practical arrangements

In order to implement this policy a number of practical arrangements are to be made within the Risk Management System. These arrangements will contain the necessary guidance, templates and forms to enable managers at all levels to meet their responsibilities. These arrangements relate to (amongst others):

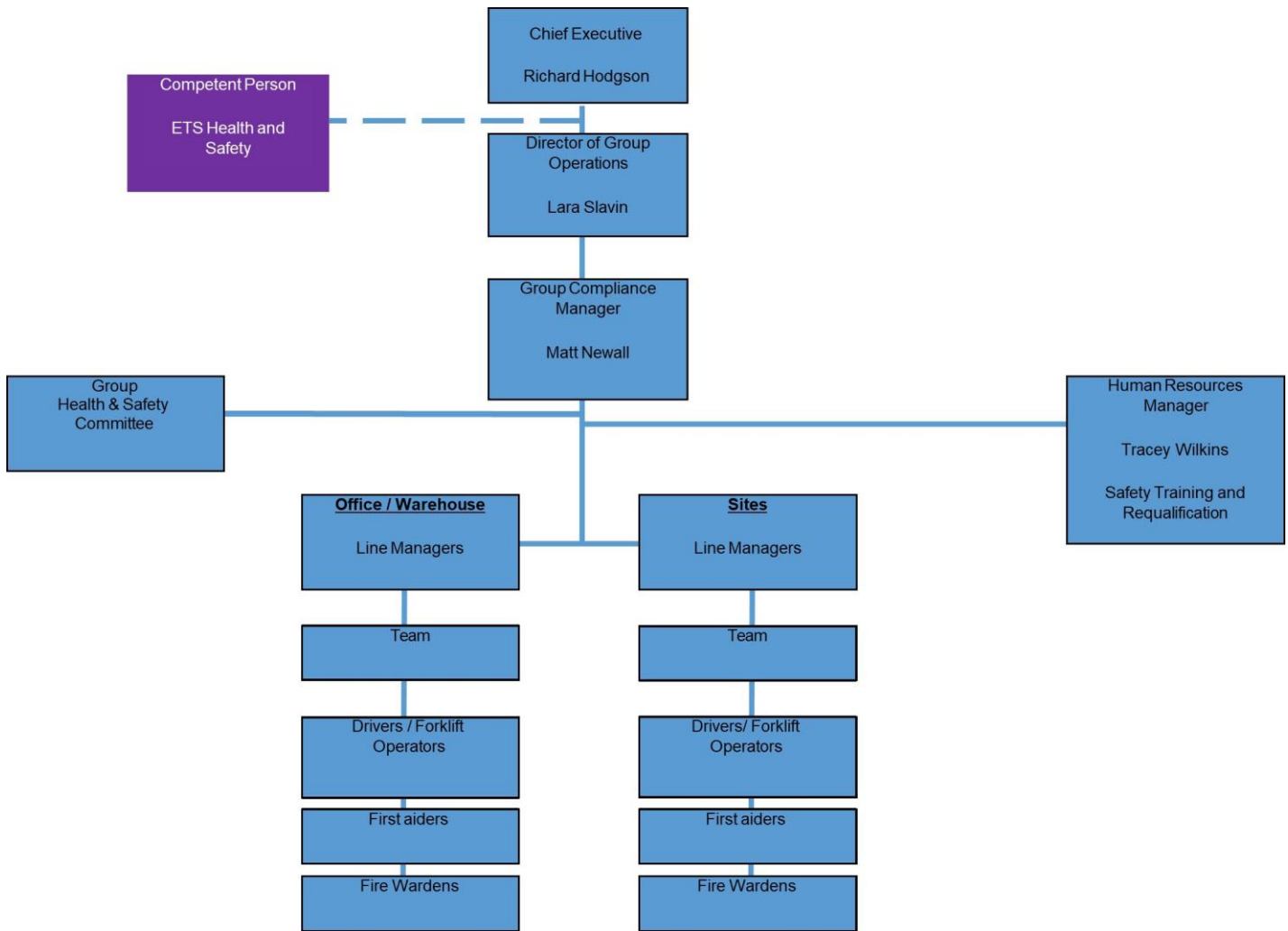
- •Identification of Health & Safety hazards and assessment of risks;
- •Identification of Environmental aspects and quantification of Environmental impacts on Health & Safety and Environmental management procedures;
- Training;
- •Communication of Health & Safety and Environmental information;
- •Health & Safety and Environmental performance reporting Emergency management arrangements and contingency planning;
- •Accident/incident reporting and investigation;
- •Maintenance of plant, equipment and building fabric;
- •Legislation, regulations and guidance applicable to the Group;
- •Management of contractors; and,
- •Procurement of goods and services.

All managers, staff and sub-contractors are expected to understand and apply these arrangements to the activities which are under their control, or over which they may exert influence.

Policy Reviews

The management team endorses this policy statement and is fully committed to its implementation, and to review this policy statement and update when necessary.

Group Organisational Chart for Health & Safety and Environmental Management



Health & Safety and Environmental Policy Statement

At APC Technology Group and its subsidiary companies (the “Group” or “Company”), we believe that as a successful member of the business community, we have significant responsibilities towards Health & Safety and the Environment. We will take all reasonable steps to ensure that our operations and activities do not place the Health & Safety of our employees, sub-contractors or any third parties at risk. Furthermore, we will take all reasonable steps to ensure that our activities do not cause harm and, where feasible, actively enhance the Environment and the communities they might affect. We acknowledge our obligations in all cases, including residual liability where third party sub-contractors are employed and will use due diligence to ensure that they meet our standards.

We recognise that our business activities have both direct and indirect impacts upon the Environment. We are committed to managing these Environmental impacts in the most effective and responsible manner using our Risk Management System to pro-actively raise our level of Environmental performance.

We will endeavour to ensure that our policies actively promote Health & Safety and Environmental protection, prevent pollution, improve legal compliance and minimise waste. We aim to achieve far more than mere passive compliance; we will undertake an improvement programme of positive action by setting annual and longer-term objectives and targets and by continually monitoring and reviewing our Health & Safety and Environmental performance. We will strive to:

- Continually improve our Health & Safety and Environmental performance and report on progress each year;
- Incorporate Health & Safety considerations and Environmental stewardship into central pillars of our business strategy;
- Develop policies and practices, which raise awareness; and both encourage and enable our staff and sub contractors to make a contribution towards achieving Environmental improvement;
- Assess all risks, develop appropriate mitigation and control procedures, and implement safe systems of work;
- Use energy and water efficiently and seek means of reducing consumption through improved management practice and technological upgrades;
- Reduce consumption of materials through re-use rather than disposal, wherever possible and promote recycling;
- Encourage our suppliers of goods and services to protect Health & Safety and to minimise the impact of their operations on the environment through our procurement policies and practices;
- Prevent pollution; and,
- Our risk management activities will be appropriately resourced and I require the general principles set out above to be cascaded across all Group companies.

This document is available for public inspection on our website.