

Health and Safety Policy Statement

General Statement of Intent

Rubax Lifts Limited is a UK Lift Installation, Lift Maintenance and Lift Servicing business which is committed to protecting the health safety and welfare of our employees, clients or anyone else that may be affected by our activities (or omissions).

The nature of our operations brings with potential risks. As such, Rubax is committed to the effective management of health and safety risks to ensure the prevention of accidents and cases of work-related ill health.

OH&S Risks will be identified, reviewed and managed.

Our people are our most valued asset, and we are intent on ensuring they remain supported and protected. We will consult with our employees on matters affecting their Health, Safety and Welfare.

It is the policy of Rubax Lifts, so far as is reasonably practicable, to:

- Identify and comply with applicable Legal and other requirements.
- Provide adequate protection to those that may be affected by our work activities.
- Provide appropriate information, training and supervision to enable employees to carry out their duties safely and effectively, ensuring:
 - all employees have the required competence to carry out tasks they are assigned
 - operatives work in accordance with safe lift working codes of practice
 - we maintain a safe and healthy working environment for our employees
 - tools, equipment and Personal Protective Equipment are effective and suitable for purpose

We will continually improve business processes and operational performance and strive to prevent the occurrence of injury and ill health.

The leadership team will monitor, review and action health and safety issues and performance within the company, proactively promoting positive safety behaviour and address unacceptable risks.

It is not acceptable for employees to put themselves or others at risk of injury or ill health. Working safely is NOT optional. Employees are encouraged to 'challenge' unsafe acts, behaviours or conditions that may endanger them or their colleagues. This Policy will be communicated to all employees to ensure everyone's responsibilities are fully understood and communicated to other interested parties.

Our leadership team will review this policy and overall health and safety performance at least annually or when significant changes occur.



David Verey, Managing Director

Reviewed May 2026

Organisation

Overall and ultimate responsibility for Rubax health and safety is that of the Managing Director.

Day-to-day health and safety will be managed and monitored by HSEQ Manager, Project and Operations management.

To ensure that health and safety standards are maintained and improved, the following people have responsibility for Health, Safety and Welfare in the following areas:

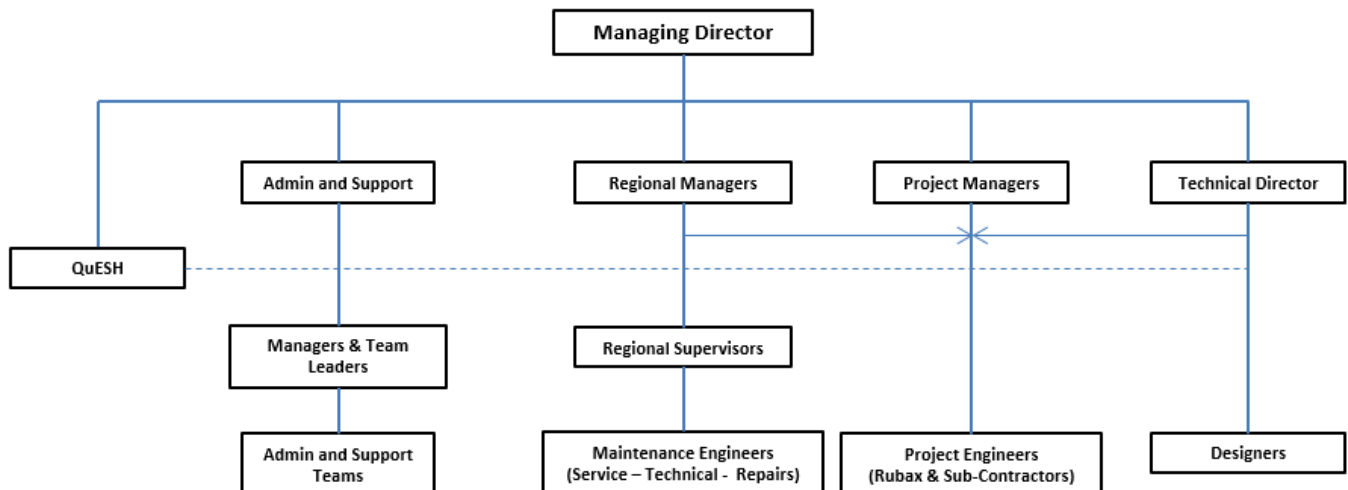
Position	Responsibility
Directors	Ensuring Rubax policies and procedures are implemented in all areas of the Rubax operation. Supporting management and operations and ensuring employee safety.
Managers and Supervision	Allocation of tasks and management and monitoring of subordinates. Implementing safe working practices. Providing suitable equipment and ensuring only competent and qualified personnel under their control are assigned to undertake tasks. Supporting operatives and responding effectively to issues raised.
HSEQ Manager	Development, management and maintenance of the H&S management system. Providing H&S information, advice and support and assisting with training and monitoring.
Field Engineers and staff	Responsible for their own activities and omissions and for adhering to procedures, industry codes of practice for working safely and for not putting yourselves and others at unacceptable risk that could cause injury or ill health. Adhering to site rules. Promptly reporting issues and concerns to Management.

Employees' Duties - All employees, including managers, are required under Health and Safety legislation to:

- Co-operate with your employer and others on health and safety matters
- Take reasonable care of yourself and others affected by your acts or omissions (things you do and things you should do)
- Maintain welfare and safety equipment provided for your wellbeing
- Not interfere with, misuse or abuse anything provided to safeguard health and safety
- Report all health and safety concerns to your manager. Informing them of any risk situation or shortcomings in protective arrangements

Non-compliance with health and safety legislation can result in legal action or disciplinary action, which may include dismissal.

H&S Organisational Chart



Rubax Lifts Limited

Wilson House
Cinnamon Park
Warrington WA2 0XP

**H&S POLICY STATEMENT**

RLHSEMSP_01
Issue: 04
Date of Last Reviewed: May 2026
Author: L. Rose

Position	Name
Managing Director	Dave Verey
HSEQ Manager	Laura Rose
Operations Manager	Lee Byrne
Technical Director	Mike Verey
Project Manager	Variable

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All other company policies and procedures in relation to health and safety are supplementary to this policy.

1. Risk Assessments

In accordance with the Management of Health and Safety at Work Regulations, the company will carry out risk assessments of activities to determine and prioritise the significant risks to employees or others. These risk assessments will be carried out in line with Health & Safety Executive guidance, and the procedure for doing so is as follows:

1. Consider the activities, working environment and methods of work
 2. Determine the significant hazards present or their potential to occur
 3. Identify who and how they may be harmed, evaluating the likelihood and severity should an incident / accident take place
 4. Record the measures to be taken to reduce risk to an acceptable level
 5. Evaluate the level of risk and decide if existing precautions are sufficient, or if more needs to be done.
 6. Record the results of assessments and indicate if (and when) the Risk Assessment will be reviewed (*many assessments are 'one off' for a specific project or remedial activity and as such will not indicate a review date*)
- Risk assessments will be undertaken by: Lift Engineers, Managers (HSEQ) and/or Directors or any persons competent in the activity
 - Approval for the required actions to remove, reduce or control risks will be given by: Directors, Managers and/or HSEQ Manager

2. Health and Safety Management System

The company operates a documented health and safety management system developed within the framework and certified to ISO 45001. Assessed by a UKAS accredited assessment authority (the company is subject to regular surveillance assessment).

- Implementation of health and safety management system is the responsibility of: Directors, Operations Management and the HSEQ Manager

3. Health and Safety Manual

The company has a health and safety reference manual, which contains information and advice on key aspects of health and safety and health and safety legislation applicable to our activities.

- The manual and documented procedures are maintained electronically at head office

4. Construction (Design and Management) Regulations 2015

Rubax Lifts Limited are occasionally appointed Principal Contractor by the Client for New Installations / Modernisations of Lifts; and therefore, recognise our duties of Principal Contractor under the CDM Regulations 2015 (Regulations 12 to 14). To ensure we comply with these regulations; Rubax will:

- make sure the client is aware of the client duties under CDM 2015 before any work starts
- plan, manage and monitor all work carried out by themselves and their workers, taking into account the risks to anyone who might be affected by it (including members of the public) and the measures needed to protect them
- check that all workers they employ or appoint have the skills, knowledge, training and experience to carry out the work, or are in the process of obtaining them
- make sure that all workers under their control have a suitable, site-specific induction, unless this has already been provided by the principal contractor
- provide appropriate supervision, information and instructions to workers under their control
- ensure they do not start work on site unless reasonable steps have been taken to prevent unauthorised access
- ensure suitable welfare facilities are provided from the start for workers under their control, and maintain them throughout the work

In addition to the above responsibilities, where Rubax engage other contractors as part of the works, we will:

- coordinate the work with the work of others in the project team
- comply with directions given by the principal designer and/or ensure contractors comply with the Construction Phase Plan relevant to their work

To further our commitment to compliance with the CDM regulations we have developed a more detailed and specific CDM policy:

OPERATING AS A CONTRACTOR Code of Practice - RLHSEPD_11

5. Consultation with Employees

The company will consult with employees in accordance with the Safety Representative and Safety Committees Regulations and the Health and Safety (Consultation with Employees) Regulations.

- Employee Representatives (ROES) include field engineers and office staff
- When and if appropriate, the company will consult directly with individuals, particularly in the case of field-based engineering staff

Health and safety arrangements are communicated through employee induction, toolbox talks, training sessions, company procedures, risk assessments and method statements. For construction projects, relevant health and safety information is shared with designers, clients and contractors through Construction Phase Plans, risk assessments and coordination meetings in accordance with CDM 2015.

6. Safe Equipment

The company and operatives will ensure that required equipment is suitable and without risks to health and safety, in accordance with legislation including the Provision and Use of Work Equipment Regulations (PUWER), the Lifting Operations

and Lifting Equipment Regulations (LOLER), the Electricity at Work Regulations. The company will ensure suitable personal Protective Equipment and Welfare Facilities are provided in accordance with the Personal Protective Equipment at Work Regulations and the Workplace (Health, Safety and Welfare) Regulations.

- Responsibility for identifying and providing equipment and protective equipment, including suitable PPE and for identifying equipment that shall require maintenance is that of the: The Directors, Managers, Engineers and HSEQ Manager
- Responsibility for identifying, agreeing and ensuring provision of suitable welfare arrangements is that of: The Directors and Managers
- Responsibility for ensuring that effective maintenance procedures are drawn up and implemented is that of: The Directors and Managers with assistance from the HSEQ Manager
- Responsibility for ensuring that all identified maintenance is implemented is that of: The Directors and Managers
- Responsibility for maintaining and requesting replacement Personal Protective Equipment: The person(s) the equipment has been issued to i.e. Engineers
- Any problems with plant or equipment should be reported to: Regional Managers and supervisors or to the Directors.
- Responsibility for checking that new equipment meets health and safety standards before it is purchased is that of: The Service and Technical Directors and Design Engineers

7. Safe Handling and Use of Substances

The company will assess and control health risks from exposure to hazardous substances in accordance with the Control of Substances Hazardous to Health Regulations (COSHH).

- Responsibility for identifying all substances that need a COSHH assessment is that of the: Managers and the HSEQ Manager
- COSHH assessments will be carried out by the: HSEQ Manager or anyone else competent in the task
- Approval for the required action to remove or control risks will be given by the: Directors, Managers and the HSEQ Manager

8. Manual Handling

The Manual Handling Operations Regulations 1992.

In line with the requirements of the Manual Handling Operations Regulations 1992, the Company will ensure that all work activities involving manual handling operations are, where possible, avoided or, where this is not possible, ensure the risks of the manual handling operation are assessed in line with the hierarchy of control. Every effort shall be taken to reduce loads and the risk of injury from manual handling operations.

Risk Assessments will identify manual handling risks and control measures introduced to reduce the risk as low as is reasonably practicable. Manual handling risks that exceed the HSE recommendations for lifting will have a full and detailed Manual Handling Risk Assessment carried out.

Arrangements shall be put in place to ensure that members of staff are made aware of assessment findings and of the control measures required to minimise the likelihood of injury from manual handling operations. These measures shall include the provision of mechanical aids such as sack trucks, trolleys, suitable containers, etc. and the provision of manual handling training for those persons who need to repeatedly carry out such operations.

9. Information, Instruction and Supervision

The Health and Safety Law poster is displayed at the head office. A copy of HSE 'Health and Safety Law', 'What you need to know' leaflet will be included in any Construction Phase Plan folder developed for Lift projects.

The company employs a NEBOSH qualified HSEQ Manager to provide competent advice on health and safety issues.

The company shall liaise as necessary with external authorities such as the HSE, consultants and the Lift and Escalator Industry Association (LEIA, lift industry trade association) and parent company H&S Professionals where internal expertise is not available.

- Supervision of young workers/trainees/apprentices will be arranged, undertaken and monitored by: Operations Management and the Field Engineers (generally, the company does not employ 'young persons')
- Responsibility for ensuring relevant health and safety information is provided to our employees working at locations under the control of other persons is that of the: The Persons in control of the premises, Rubax Directors, Project Management and attending engineers

10. Training and Competency

- Induction training for all new employees is the responsibility of the: Directors, Managers and HSEQ Manager
- Job specific training will be provided by: Directors, Managers and Supervision
- Specific tasks requiring special training: As required to meet the needs of the business can include the use of external professionals
- Training records are kept at/by: Head office in the locked and restricted access personal files maintained for each individual employee
- Training will be identified, arranged and monitored by the: Directors, Managers and the HSEQ Manager

11. Accidents, First Aid and Work-Related Ill Health

- Health Surveillance is assessed, as required. Identified following risk assessment (not required under the current scope of activities)
- Health Surveillance will be arranged by: Directors, Managers and HSEQ Manager utilising 3rd party surveillance professionals
- Health Surveillance records will be kept by/at: In employee's restricted access, personal file at Head office
- First aid box(s) are located at: Head office in the kitchen area and in each field engineer's vehicle
- The appointed person(s) / first aider(s) are: EFAW trained and certified staff
- All accidents and work-related ill health are recorded in the accident book, which is kept at/by: Head office by the HSEQ Manager and summarised electronically on the company server
- Responsibility for reporting accidents, diseases and dangerous occurrences to the enforcing authority is that of: HSEQ Manager or any Manager or Director
- Responsibility for reporting accidents, incidents and near misses is that of: The employee experiencing or witnessing the accident, incident, unsafe condition or near miss.

12. Monitoring

- To check our working conditions, and ensure our safe working practices are being followed, we will: Carry out initial site and equipment surveys and assess the equipment and the working environment, including the provision of welfare arrangements
- Undertake periodic site audits and monitoring of our activities appropriate to the size, complexity and duration of work undertaken
- Random monitoring of field engineers' quality of work and adherence to procedures and safe working codes of practice.
- Responsibility for investigating accidents is that of: Operations Management with support from the HSEQ Manager
- Responsibility for investigating work-related causes of sickness / absence is that of: Operations Management supported by the HSEQ Manager
- Responsibility for acting on investigation findings to prevent a recurrence is that of: The Directors, Managers and HSEQ Manager. Employees to cooperate with protective measures

12.1 Audit and Review

The company will undertake periodic internal audits of the Health and Safety Management System to verify compliance with company procedures, legal requirements and ISO 45001 standards.

Internal audits will be coordinated by the HSEQ Manager and may involve Directors, Managers or other competent persons where appropriate. The purpose of these audits is to ensure that the management system is effectively implemented, maintained and continues to be suitable for the nature and scale of the company's activities.

Audit findings will be reported to senior management and corrective actions implemented where necessary. Progress against identified actions will be monitored to ensure effective resolution.

The Directors and senior management will review health and safety performance periodically. This review will consider accident and incident trends, audit findings, monitoring results, legal compliance and opportunities for continual improvement. Actions arising from the review will be implemented to improve health and safety performance across the organisation.

13. Emergency Procedures – Fire and Evacuation

- Responsibility for ensuring the fire risk assessment for our premises is undertaken and completed is that of: The Directors
- Escape routes are checked: Periodically by staff
- Fire extinguishers are maintained and checked by/every: Annually under contract by a fire extinguisher supplier by the landlords representative
- Emergency evacuation will be tested every: 12 months – organised by the landlord to include all building occupants
- Site Emergency arrangements: Arrangements are communicated to attending engineers by the persons in control of premises. (Usually by a facilities manager or in their absence of by their security or caretaking staff)
- Attending engineers are required to comply with site arrangements.
- Rubax provides engineers with mobile phones and operate a 24/7 x 365-day contact line and on call staff. Any issues are escalated to our company Operations Management or Directors
- Office staff receive instruction regarding emergency arrangements during induction
- Emergency Information is displayed on the notice board for employee or visitors reference

14. Welfare

Welfare arrangements shall include the provision of toilets with lockable doors, washing facilities with hot water, a place to take breaks away from the work area where the person can sit and consume food and drink. A source of drinking water and somewhere to heat food shall also be provided:

- Suitable welfare provisions are available at the head office
- Welfare facilities shall be provided by clients for engineers working on their premises
- If welfare facilities are not readily available to field engineers, suitable welfare equipment shall be hired by the company for use by the attending engineers