Management System Policy Manual Overview

Revised to conform with:
The Health and Safety at Work Act etc. 1974,
Compliant with Annex SL
(Incorporating ISO 45001:2018).

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Introduction

At BDR Thermea UK&I (hereafter referred to as Baxi), we believe that Safety Matters and that no job is so important that we cannot take the time to do it safely, without ill health or damage to the environment. Baxi believe in, and aspire to the following principles that are embedded in our safety matters strategy;

Health – organising our activities so that they prevent occupational health related issues to our staff / workers (Colleagues).

Safety – Undertaking our activities in such a manner that prevents harm to our staff / workers (Colleagues), contractors and any other persons who may be affected by our operations

Environment – ensuring that our activities, products, and services are sustainably delivered to minimise our impact on the Environment.

Our aspirations reflect these principles, which are

Health – No occupational ill health incidents.

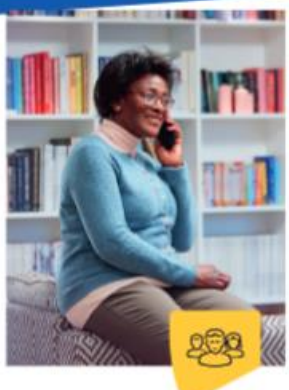
Safety – Zero harm

Environment – Zero environmental incidents.

Living our core values enables us to continuously drive towards the achievement of our aspirations.

Our Values

United in bringing the energy transition to life



Customer focus

Serving our customers is what makes us tick

We always put them first, inspiring them to join us as ambassadors on our journey to a sustainable future.

One team

We are stronger together

The diversity of our talent and collective ambition help us learn and grow. We work as one team. With our customers, we develop the right solutions for a better world.

Sustainable future

We care about shaping a better future

We continuously improve our business and innovate to bring the energy transition to life. We make a difference every day.

BDR THERMEA UK & IRELAND

Our HSE strategy, ambitions and principles are aligned with our values, and with the BDR Thermea UK&I (Baxi) and the BDR Thermea Group strategic outcomes which can be visualised below

Company Outline and Scope of Operations

In the UK and Ireland, Baxi has a portfolio of some of the best known and most respected brands in the heating industry. From our award-winning customer support to our industry-leading hands-on training, we are fully committed to making life with Baxi as easy and safe as possible.

We have a strong research and development platform and the financial strength of BDR Thermea Group means we make considerable capital investment to stay at the cutting edge of innovation. We are actively involved with designing products that will take us into the zero carbon future.

We provide integrated solutions for domestic and commercial heating and hot water including boilers, electric water heating, air source heat pumps, combined heat and power, heat interface units (HIUs), prefabricated plant rooms and skids, controls and digital applications.

We employ over 1,200 people in the UK and Ireland and our manufacturing site is in Preston, close to where Baxi was first established in 1866.

Scope

The Baxi HSE scope is defined below for each area of the business:

UK&I - "The design, manufacture, assembly, and supply of; heating and hot water products, associated components and systems. The provision of servicing, support and training on heating and hot water products and associated components."

Preston - "The design, manufacture, assembly, supply and aftersales support of; heating and hot water products, associated components and systems."

Warwick - "The provision of servicing, support and training on heating and hot water products, associated components and systems. The design of heating and hot water systems."

Training Centre - Warrington: "The provision of training on heating and hot water products, associated components and systems"

Training Centre - Dartford: "The provision of training on heating and hot water products, associated components and systems"

Ireland - "The provision of servicing, support and training on heating and hot water products, associated components and systems."

The Management System

This document sets out the framework of the HSE Management System used within Baxi. It is a précis of our current HSE Management Systems and is intended to give an overview to customers and interested parties and promotes Baxi philosophies and practices to customers.

The Management System is the organisational structure, responsibilities, activities, resources and events that together provide organised processes, procedures and methods of implementation to ensure the capability of the Company to meet its Health, Safety and Environmental requirements.

The system documented by this manual contains details of policies, organisation and procedures for all functions which impact upon the Health, Safety and Environmental performance of the Company.

The purpose of this document is to:

- overview the HSE management system and the business it supports
- enable checks to be undertaken to confirm that they are suitable, adequate, effective and properly implemented

Management System Requirements

Process Interrelation

The interrelation of the core activities that underpin the Management System is illustrated on the following page. Core processes are organised to deliver continual service and financial improvement and are enabled by supporting processes – both are accessible via the intranet:

Plan-Do-Check-Act Approach

To drive continuous improvement throughout the business the Management System is based on the Plan Do Check Act Cycle. Just as a circle has no end, the **PDCA** cycle is repeated again and again for continuous improvement.

Plan

What we want to accomplish over a period of time & what we might do, or need to do to get there. – ***Reflects Management responsibility for managing & controlling the business effectively in order for it to achieve its objectives***

Do

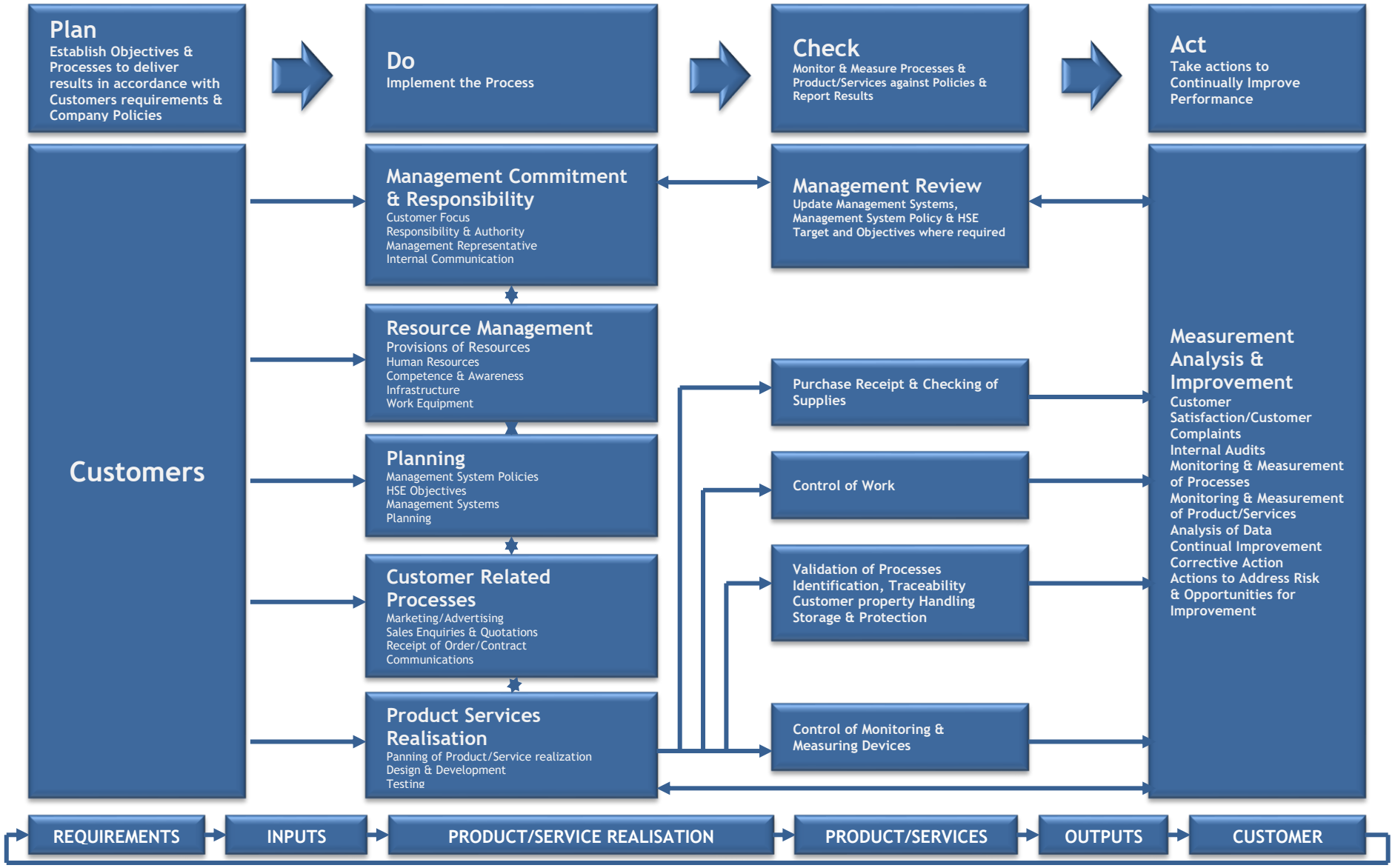
What we plan on doing. – ***Delivering a timely, cost effective service that meets safety, health & environment requirements & needs.***

Check

The result of what we did to see if the object was achieved. – ***Concerned with measuring & evaluating performance.***

Act

On the information & plan for further improvement. – ***Driving innovation & improvements in business performance.***



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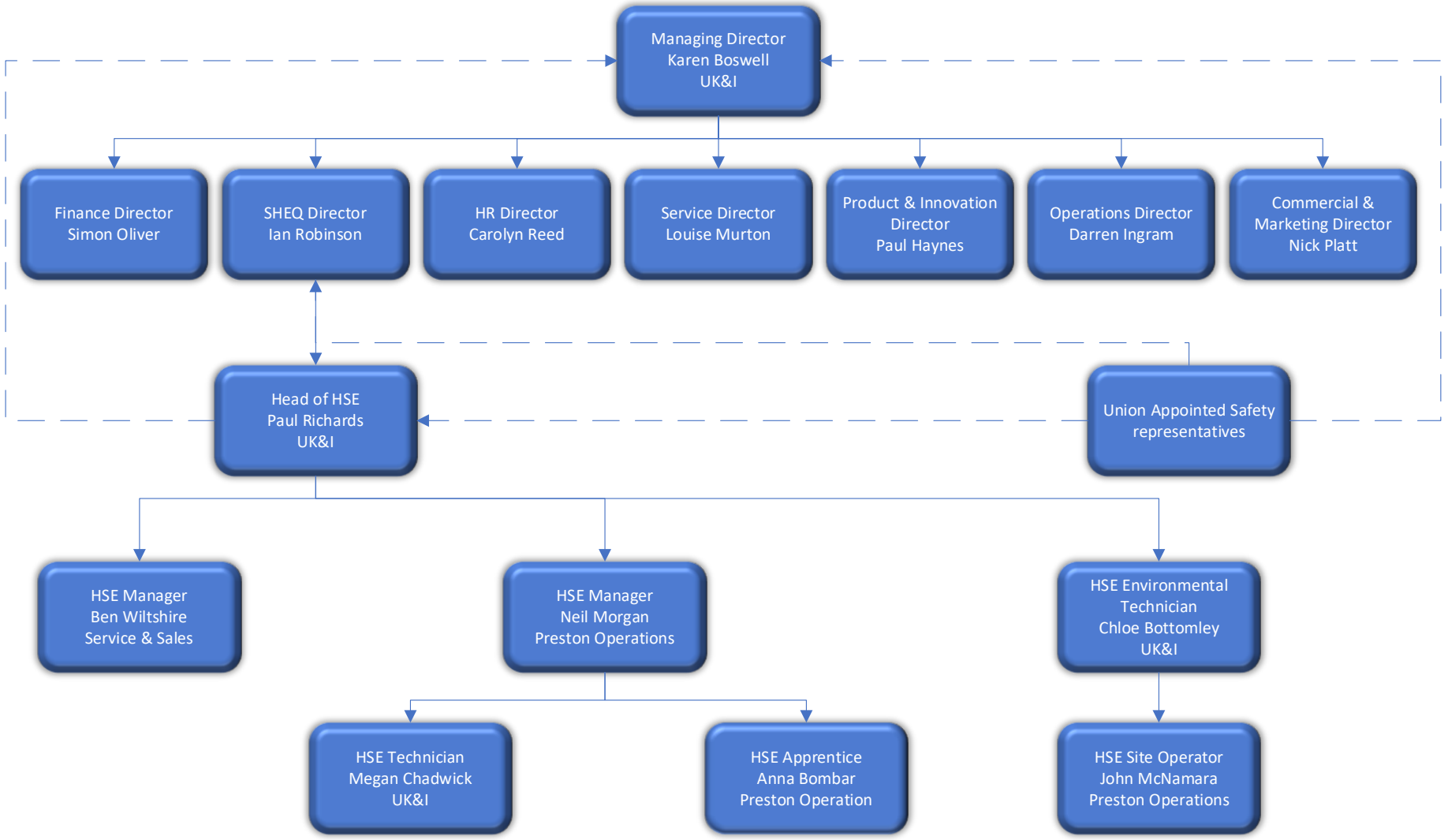
Leadership - HSE



Plan

4.0 Context of the Organisation

4.1 Understanding the organisation and its context

Context of the Organisation

Baxi operates within a competitive business environment. By accurately identifying the context of our organisation, Baxi ensures that Health, Safety and Environment is a key driver in achieving business objectives in order to deliver quality products and services to our customers.

Business Context

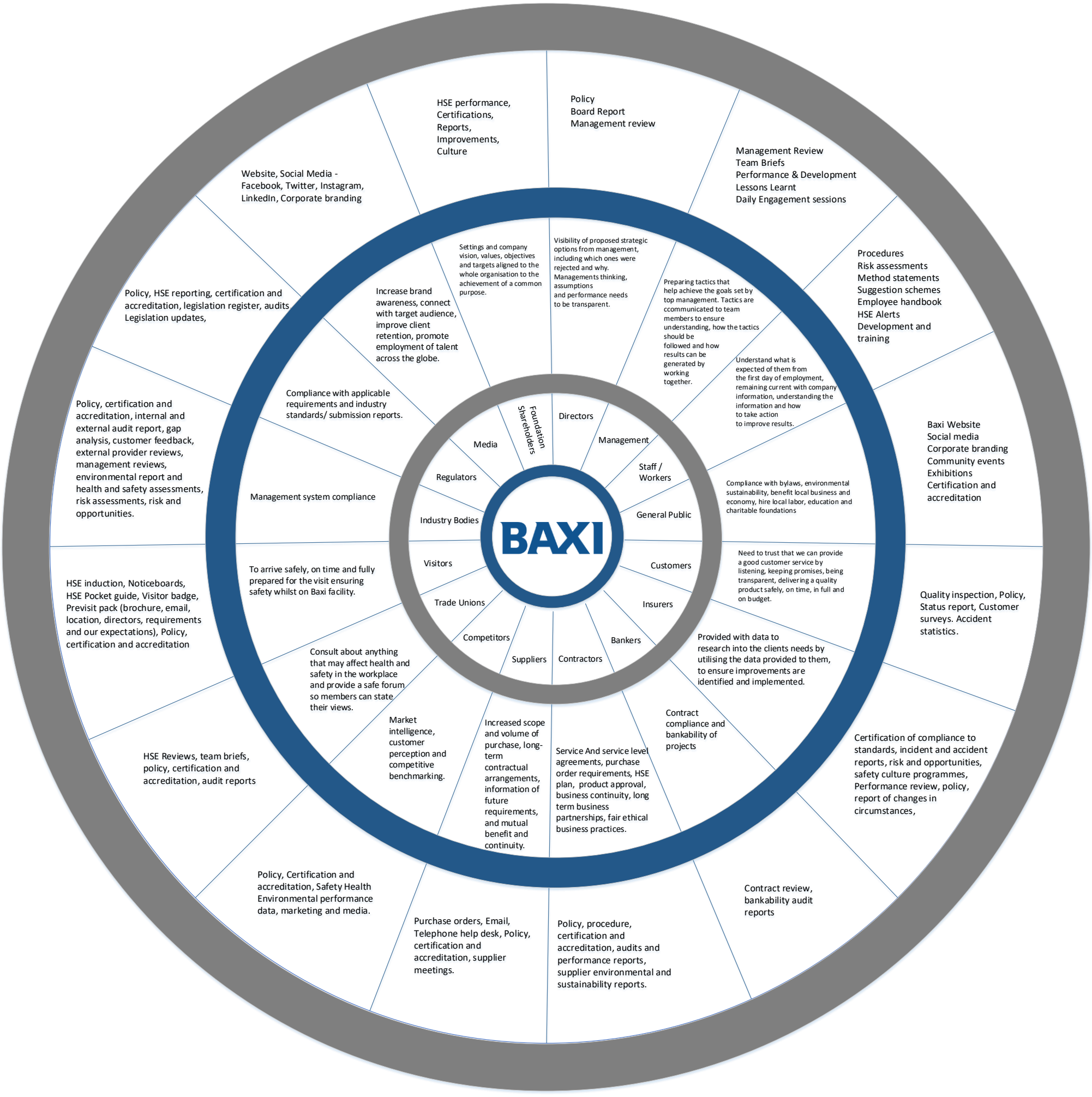
Baxi understands the context within which it operates by monitoring and reviewing both internal and external factors that are relevant to its business environment and which may affect its ability to achieve the intended outcomes of its Health, Safety & Environmental Management System. This information/data is utilised to help plan and guide its overall strategic direction.

4.2 Understanding the needs and expectations of interested parties

Interested parties and their requirements are reviewed and monitored on a regular basis to ensure the business reacts to changing needs.

Interested parties may include the following which is not exhaustive:

Customers – For whom the service is provided
Management – Members of staff to who represent the organisation
Staff / Workers – Enable the business to fulfil its potential
Suppliers –Baxi relies on wide range of suppliers to provide products & Services
Insurers - Baxi have a legal requirement to hold specific insurances
Contractors - The use of specialists to fulfil different client's requirements
Enforcing authorities - Comply with national and international legal requirements and support emissions reduction targets as a minimum
Competitors – Baxi do not operate in isolation and must be aware of competition and maintain a competitive edge.


BAXI
Foundation Shareholders
Directors
Management
Staff / Workers
General Public
Customers
Insurers
Bankers
Contractors
Suppliers
Competitors
Trade Unions
Visitors
Industry Bodies
Regulators
Media
HSE performance, Certifications, Reports, Improvements, Culture
Policy
Board Report
Management review
Management Review
Team Briefs
Performance & Development
Lessons Learnt
Daily Engagement sessions
Procedures
Risk assessments
Method statements
Suggestion schemes
Employee handbook
HSE Alerts
Development and training
Baxi Website
Social media
Corporate branding
Community events
Exhibitions
Certification and accreditation
Quality inspection, Policy, Status report, Customer surveys. Accident statistics.
Certification of compliance to standards, incident and accident reports, risk and opportunities, safety culture programmes, Performance review, policy, report of changes in circumstances,
Contract review, bankability audit reports
Policy, procedure, certification and accreditation, audits and performance reports, supplier environmental and sustainability reports.
Purchase orders, Email, Telephone help desk, Policy, certification and accreditation, supplier meetings.
Policy, Certification and accreditation, Safety Health Environmental performance data, marketing and media.
HSE Reviews, team briefs, policy, certification and accreditation, audit reports
HSE induction, Noticeboards, HSE Pocket guide, Visitor badge, Previsit pack (brochure, email, location, directors, requirements and our expectations), Policy, certification and accreditation
Policy, certification and accreditation, internal and external audit report, gap analysis, customer feedback, external provider reviews, management reviews, environmental report and health and safety assessments, risk assessments, risk and opportunities.
Website, Social Media - Facebook, Twitter, Instagram, LinkedIn, Corporate branding
Policy, HSE reporting, certification and accreditation, legislation register, audits Legislation updates,
Settings and company vision, values, objectives and targets aligned to the whole organisation to the achievement of a common purpose.
Visibility of proposed strategic options from management, including which ones were rejected and why. Managements thinking, assumptions and performance needs to be transparent.
Preparing tactics that help achieve the goals set by top management. Tactics are ccommunicated to team members to ensure understanding, how the tactics should be followed and how results can be generated by working together.
Understand what is expected of them from the first day of employment, remaining current with company information, understanding the information and how to take action to improve results.
Compliance with bylaws, environmental sustainability, benefit local business and economy, hire local labor, education and charitable foundations
Need to trust that we can provide a good customer service by listening, keeping promises, being transparent, delivering a quality product safely, on time, in full and on budget.
Provided with data to research into the clients needs by utilising the data provided to them, to ensure improvements are identified and implemented.
Contract compliance and bankability of projects
Service And service level agreements, purchase order requirements, HSE plan, product approval, business continuity, long term business partnerships, fair ethical business practices.
Increased scope and volume of purchase, long-term contractual arrangements, information of future requirements, and mutual benefit and continuity.
Market intelligence, customer perception and competitive benchmarking.
Consult about anything that may affect health and safety in the workplace and provide a safe forum so members can state their views.
To arrive safely, on time and fully prepared for the visit ensuring safety whilst on Baxi facility.
Management system compliance
Compliance with applicable requirements and industry standards/ submission reports.
Increase brand awareness, connect with target audience, improve client retention, promote employment of talent across the globe.

Identification of Legal & other Requirements

Baxi monitors changes in legislation and assesses the impact it may have on its businesses particularly from a health, safety and environmental point of view. Baxi maintains and makes available legal & other registers for our activities.

Baxi ensures that applicable legal and other requirements are considered in establishing, implementing and maintaining our Health, Safety & Environmental Management System. Baxi subscribes to an online tool (LUS by the Compliance People) to determine how these requirements apply to our operations.

The legal register is reviewed following any amendments to applicable legislation or, as a minimum, on an annual basis.

Items to be considered but not limited to:

- Policy requirements
- Legal requirements
- Industry Codes of Practice
- Agreements with public authorities
- Non-regulatory guidelines
- Company standards
- Contract requirements

Information updates/changes are obtained by a number of media means:

- HSE
- IOSH
- IIRSM
- IEMA
- LUS – Compliance People

5.0 Leadership

There is full commitment from the executive team at Baxi with a Health & Safety Committee in place representing the various functions of the business to achieve HSE improvement, provide a governance framework and deliver the HSE objectives. Having the leadership and commitment from the executive team ensures that HSE is embedded across Baxi and forms part of everything that we do.

5.1 Leadership & Commitment

The Managing Director has appointed a QSHE Director to take accountability for HSE and report to the Board of Directors on all matters concerning HSE.

Top level management play an active role in analysing the effectiveness of the HSE Management System in order to continually improve its results in a planned and strategic manner. The Directors take responsibility for their respective areas of the business and the HSE activities within them.

5.2 Policy

Policy statements are updated on an annual basis, they are reviewed and signed by the Managing director and displayed at all locations and communicated to staff, contractors and clients where appropriate, during inductions as a means of confirming our commitment to carrying out our activities safely and with due regard for the environment. The policies are available to stakeholders on request.

The policies will be appropriate to Baxi's activities and services and is derived from the overall policies and strategy of Baxi's and provides a framework for establishing and reviewing objectives.

Baxi are committed to:

ensuring that all inputs, operational activities and outputs fully meet statutory requirements and leads to the adoption of best practices and facilitating protection of, and improvement in company performance that may affect health & safety and the environment. The adoption shall comply with the requirements of "The Health and Safety at Work etc. Act 1974" the Management of Health and Safety at Work Regulations, ISO 45001, ISO 14001 and ISO 50001.

The Company Management Systems Policies will apply to all of our directly controlled activities and services.

The operation and efficiency of the Management Systems Policies shall be continually monitored. Where it is felt necessary the policy will be revised and re-issued. This shall take place as often as is necessary, but in any event the policy will be reviewed and updated at intervals not exceeding twelve months.

A copy of the latest signed and dated statement can be viewed on the Company Intranet and on HSE notice boards.

5.3 Organisational, Structure, Roles, Responsibilities & Authorities

Roles, responsibilities, and authorities are identified using job descriptions and organisational charts. Below is an overview of general roles and responsibilities.

Employees

Managers and Supervisors

Senior Managers and Directors

Leadership and Commitment			
Culture	You will support our health and safety culture through demonstrable accountable safe behaviours	You will always lead by example, following rules, procedures and general safe behaviour. Maintain and challenge standards. Involve others	You will be committed to continuous health and safety improvement and developing an industry leading health and safety culture
Leadership	Your actions will always take account of your own safety and the safety of your fellow work colleagues. You will report unsafe acts and conditions to allow them to be controlled	You will promote safe behaviours through your actions. Take timely action on safety issues. Ensure effective control of health and safety hazards is achieved	You must accept your personal responsibility and accountability for safety performance. Maintain active engagement on safety performance with direct reports. Provide sufficient resources
Intervention	If you witness unsafe acts or conditions you must step in – if it is safe to do so. Always do this in a positive and polite manner. Act positively when this may happen to you	You must make colleagues aware of acceptable standards. Stepping in where required. Celebrate good safety performance, assign performance objectives to ensure continuous improvement	You must recognise good safety performance and ensure suitable action plans are completed for areas in need of further improvement. Promote sharing of information
Policy and performance objectives			
Objectives	You should understand the safety requirements for your job role. Through H&S meetings and interactions you will have a great opportunity to contribute	You must communicate company objectives to your direct reports and ensure they understand. Comply as a minimum level of performance with company policies and procedures	You must involve all levels of the organisation with objective setting and communication. You must personally monitor the performance of objectives within your team
Organisation and arrangements			
Organisation	You must make sure you understand the structure of the organisation. In particular who can support you on health and safety	You must ensure that all safety responsibilities are understood. Accountability for safety performance is determined and demonstrated	You must maintain an effective management structure and arrangements to ensure the safety of personnel under your responsibility
Training and experience	You must not carry out tasks without training and a good understanding of the risks involved. Only operate equipment and machinery you have been trained to operate	You must provide the necessary resources to ensure personnel under your control receive adequate training for their role.	You must determine the qualifications and experience for all roles within your area of responsibility.
Competence	You must always follow the appropriate safety rules and procedures and ask for clarification if you are not sure	You must ensure personnel under your leadership are competent. You must assign SMART performance objectives for Health and Safety	Ensure only personnel with demonstrable competence are appointed. You must assign SMART performance objectives for Health and Safety
Risk Control and Management			
Workplace	You must keep your workplace and the work equipment you use in a clean, tidy and safe operating condition	You must maintain a safe and healthy working environment for all personnel. You must inspect the workplace to maintain standards	You must ensure resources are provided to achieve sustained safe and healthy working environment
Risk assessment	You must comply with the agreed risk assessment as a minimum level of performance. Report immediately issues in relation to any risk assessment	Ensure risk assessments and safe working procedures are completed and reviewed. Agree control measures with team members. Reduce risks to acceptable levels	You must ensure a risk based safety management system is in place and is regularly reviewed. Review the effectiveness of the system through performance monitoring
Implement and monitor			
Consult	You will be involved in the consultation process. Take part and give your point of view	You must communicate relevant parts of the safety management system to your teams. Regularly consult with others on health and safety matters	You must communicate relevant parts of the safety management system to your teams. Regularly consult with others on health and safety matters
Legal compliance	You must adhere to our safety policies and procedures to ensure legal compliance	You must remain aware of the H&S legislative requirements applicable in our business	You must remain aware of current legislation and assess the impact of new legislation
Incident investigation	You must report any incident which you are involved or witness immediately	You must investigate all incidents to identify root cause and put in action plans to prevent reoccurrences	You must review incidents and incident performance. Share learning's with others. Ensure corrective measures are achieved
Discipline	You must conduct your role in accordance with your training and procedures provided	You must take action where H&S performance standards fall below acceptable levels	You must take action where H&S performance standards fall below acceptable levels

5.4 Participation and Consultation

Baxi recognises its duties to consult with their employees or their employee's representatives on Health and Safety matters under:

- The Safety Representatives and Safety Committees Regulations 1977 (as amended)
- The Safety Representatives and Safety Committees Regulations (Northern Ireland) 1979 and;
- The Health and Safety (Consultation with Employees) Regulations 1996 (as amended)
- The Health and Safety (Consultation with Employees) Regulations (Northern Ireland) 1996

Meeting our duties and the wider need for effective employee engagement can be achieved by consulting with employees and by providing a forum for effective two-way communications for open discussion in terms of Health, Safety and Environment.

In order to achieve this, the location or business area will ensure communication between management and the workforce.

6.0 Planning

6.1 Actions to Address Risk and its Opportunities

Whilst planning for the management system, Baxi has considered the issues in 4.1 (understanding the context of the organisation) and the requirements referred to in 4.2 (understanding the needs and expectations of interested parties) and developed a mechanism to identify the risk and opportunities that need to:

- Assure the management system(s) in place can achieve their intended outcome.
- Prevent, or reduce undesired effects.
- Achieve Continual Improvement.

Risk and opportunity is a primary consideration in decision making throughout Baxi. It aims to mitigate risk and exploit opportunities in an organised and coherent manner. These feed into short and long-term objectives.

Hazard Identification & Evaluation of Aspects, Impacts & Risks

Baxi have identified the significant hazards and risks to the organisation and its associated operations and have recorded their finding in a significant risk register that is reviewed at least annually by the HSE Team and Top Management.

At a local level hazard identification follows the same process and the findings are recorded locally. The significant risks are then managed through the risk assessment process and reviewed at intervals determined during the risk assessment process.

Particular attention should be paid to:

- Activities of all personnel having access to the workplace (including contractors and visitors);
- Routine and non-routine, i.e. periodic or emergency activities;
- Activities, products or services that can be controlled or influenced, i.e. purchase;
- The environmental concerns of interested parties;
- Existing and changing legislation and regulations;
- All information on hazards, risks and environmental aspects and impacts assessments is kept up to date and regularly reviewed;

- High risk hazards and significant environmental aspects are taken into account in establishing, implementing, and maintaining the Integrated Management System.

Due consideration will be given to activities in the Risk Assessment process, Baxi will ensure compliance with any relevant legislation & other requirements and encourage best practice and improved HSE performance.

6.2 H&S Objectives and Planning to achieve them

Health & Safety Objectives and targets

In the context of HSE objective setting, Baxi consider operational and business risks, legal compliance obligations and key stakeholder views.

To ensure the continuous improvement of HSE through the setting of targets and objectives, the HSE Committee add a layer of governance via a review of progress and suitability during meetings. Additional review of the progress is undertaken by the Executive Leadership team (ELT) within the monthly meetings via the HSE board report.

Baxi has established, implemented and maintains programmes for achieving its objectives and targets which include the designation of responsibility for achieving objectives and targets at relevant levels within the organisation, and the means and time-frames by which they are to be achieved.

Action plans are in place to achieve the HSE objectives within a timely manner.

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7.0 Support

Support processes are critical to ensure that personnel are given the required skills, equipment/tools and working environment to deliver the management system and obtain the required results.

7.1 Resources,
7.2 Competence,
7.3 Awareness

A review of competence will be undertaken as part of the annual appraisal process, these are designed to identify the appropriate performance and development plans for individuals and then measure their achievement against those plans with any further training needs identified and time scales for completion agreed to implement the management system.

Staff and operatives employed are appropriately trained for the duties they are required to perform, with the skills or experience necessary to their profession or trade. Records are kept of training received and of qualifications and membership of any professional institutions.

Baxi continually assesses the capability of existing resources affecting the Management System in order to identify potential gaps and address them where necessary. This is encompassed within the management review.

Departmental Managers are responsible for training and development within their areas of the business. Processes are in place and reviewed regularly to ensure that competence requirements are identified and addressed where necessary. Gaps may be filled in a variety of ways including:

- Internal training
- External training
- E-Learning

Awareness training is given through:

- Induction to all staff /worker, contractors and visitors providing information on the hazards, key requirements and other issues including company standards.
- training to groups of key personnel who are involved in the detailed requirements of management procedures
- toolbox talks used to provide on-site technical, safety and environmental etc. awareness
- briefing sessions used to make contract teams aware of forthcoming activities and any associated method statements

New staff joining the company receive induction on Baxi and local issues upon arrival.

7.4 Communication

Baxi has written and verbal communication programmes that provide sources of information on their Management System and related subject matter. Much of this is available via the company intranet with certain key information distributed regularly by e-mail to all those with Baxi addresses. This and other information is cascaded through Toolbox Talks, team briefings, daily Gemba meetings etc. which as well as facilitating discussion also includes those who do not have access to e-mail.

In accordance with its policies, Baxi maintains communication with internal and external parties to insure flow of information on its Health, Safety & Environment performance, feedback, new developments, and concerns, if any.

Internal Communication

What	When	Responsibility	How
Policy	Change in policy/new starter	Manager	Employee Brief (as applicable)/Managers HSE Meeting/TBT/ HSE Induction
Relevant HSE Management System Information	As and when required	HSE Department	Managers HSE Meeting/ Quarterly Brief (as applicable)
HSE Management Review	Quarterly	HSE Department	Within HSE Board Report
HSE Objectives and KPIs	Quarterly	HSE Department	Within HSE Board Report

External Communication

What	When	Responsibility	How
Policy	Change in policy	Manager	Website updated via Baxi Communications Team
LAPPC Permit Information/Compliance	As requested	HSE Manager/HSE Advisor	Information/data sent electronically to the Regulator
Customer	As requested	HSE Manager/HSE Advisor	Data sent electronically

7.5 Documented Information,
7.5.2 Create and Updating,
7.5.3 Control of documented information

When creating and updating documents Baxi shall ensure appropriate identification and description, format and review with appropriate approval for suitability and adequacy.

Procedures and guidelines are in place to ensure that the key processes, objectives, and performance indicators are achieved. HSE records are established and periods for their retention are documented in in accordance with the company governance requirements. Subsequent updates and amendments, which will meet the requirements identified in the Management System are reviewed and approved prior to issue.

This document contains the main elements of the Management System and is available on a controlled basis through the Company Intranet where relevant procedures are also held.

Controlled documents are defined as those that transfer key information in the form of drawings, specifications, method statements and are by their nature subject to revision.

Correspondence includes letters, faxes, memorandum and document transmittals, are generally issued only once and are therefore not subject to update or amendment.

Do

8.0 Operational Control

8.1 Operational Planning and Control

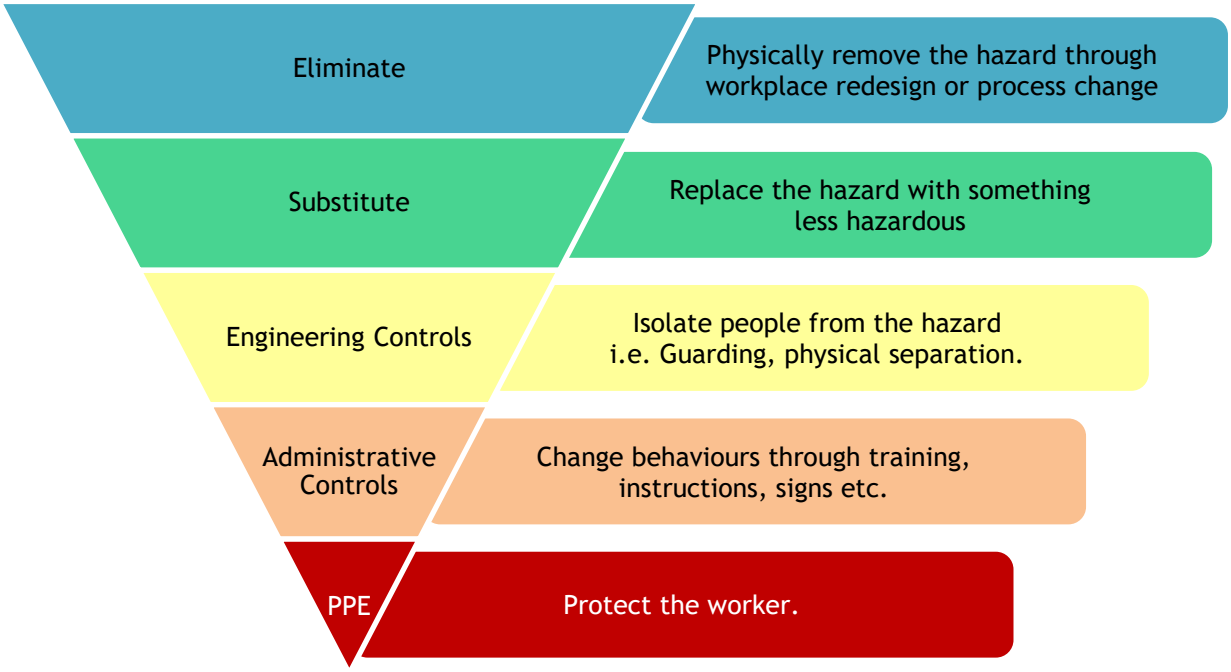
Baxi operations having significant Safety, Health and Environment risks and impacts that are identified through our Risk Assessment process. Where required, appropriate documented procedures are established and maintained, defining how these operations must be carried out. Additional local system procedures may be produced at local level as required.

General tasks, including manufacturing and maintenance are carried out in accordance with HSE requirements and technical standards, designed to negate accidents and to maximise effective and safe completion.

Operational procedures are available on the Company Intranet.

Eliminating Hazards and Reducing Risk

Baxi apply the principles of the risk reduction hierarchy to eliminate risk.



Management of Change

Baxi have a process that considers the impact on HSE performance resulting from planned temporary and permanent change. The process will consider impacts from, Engineering, Operation & Design, Quality, Operational Personnel, External personnel, regulations, standards & codes of practice, operational structures, suppliers, community, client.

The findings of the process will feed into the resulting change requirement.

Contractors

Contractors are required to pre-qualify prior to being considered for working at any Baxi location.

Pre-qualified contractors will be engaged in the following process

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Document No. - UKI-02-PM-09.2
Revision - 0
Owner - HSE
Issue Date - August 2023
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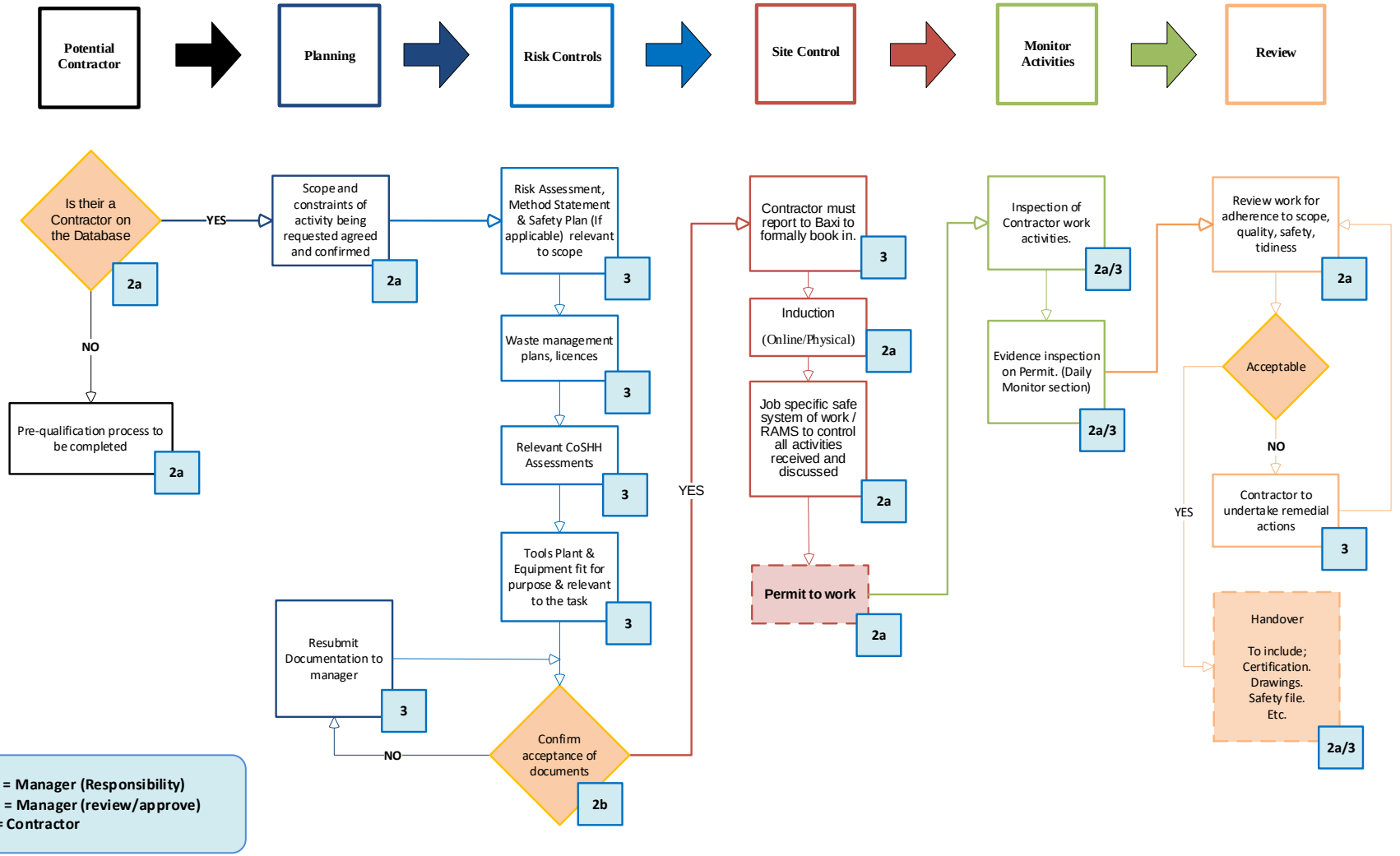
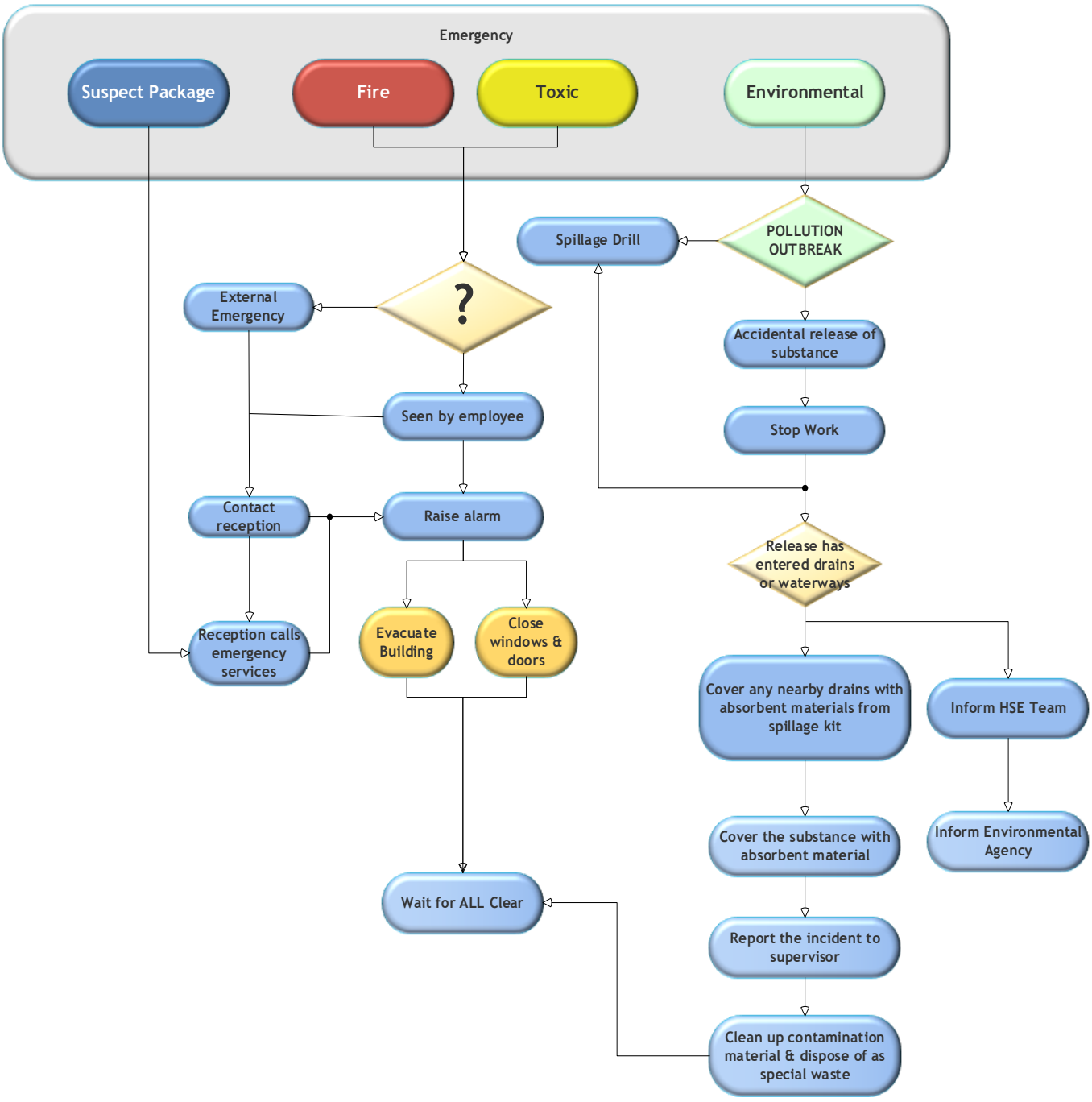
Contractor Management Process



Emergency Preparedness



Additional emergency preparedness procedures may be required at local level.

Check & Act

9.0 Performance Evaluation

9.1 Monitoring, Measurement, Analysis and Evaluation

Improvement and Performance Monitoring

Baxi has established processes for monitoring and measuring the HSE performance on a regular basis. These processes provide for both qualitative and quantitative measures, proactive measures that monitor compliance, reactive measures of performance to monitor accidents, near misses, and other evidence of substandard HSE performance. The recording of such data and the ensuing results will be used to facilitate subsequent corrective and preventive and or improvement action analysis.

Certification Body Audits, external audits by interested parties, Internal Audits and Site HSE Tours are undertaken as programmed.

Baxi ensures that calibrated or verified monitoring and measurement equipment is used and maintained and that associated records are retained.

Evaluation of Compliance

Procedures are implemented and are maintained to ensure the periodic evaluation of compliance with applicable business, contract, legal and other requirements relating to the work activities being undertaken. Records of these evaluations are retained.

HSE Department will carry out annual evaluation of compliance with legal and other requirements and will also be reviewed following amendments to applicable legislation, as part of the Management System audit. The audit report will identify and detail the compliance status and any non-conformances and make recommendations on actions required within the given timescales to address these issues.

Internal Audit

Procedures are implemented and are maintained for conducting internal audits to confirm that the management system continues to be effective in meeting its objectives and to identify potential improvement by:

- auditing the HSE system processes, in accordance with an internal audit plan
- reviewing a summary of the results of the internal audits as part of the agenda for the management review meeting
- ensuring auditors are competent and independent of the process being audited
- ensuring that appropriate corrective actions and follow-up verification activities are taken without undue delay

The internal audit program is used as a tool to check the compliance of company's processes against ISO 45001:2018 requirements and their efficiency.

Auditors verify that work activities in the areas of manufacturing, delivery, service, and Safety, Health, Environment, are planned, performed, and comply with the requirements of our Management System. Written procedures are in place to define the responsibility for planning and conducting audits,

reporting their results and maintaining records. Internal auditors shall not audit their own work. All activities affecting the Management System shall be audited at least once a year. The departments audited shall receive timely reports on the findings of audits and department managers shall perform timely corrective action. Audit findings shall be documented and followed. These actions shall be reviewed during HSE meetings and management review meetings.

Findings from the audits are assessed to identify systemic failures and lessons learned are applied across Baxi, where applicable, to maximise the value of the audit system and to drive improvements throughout.

Management Review

The Management System is subject to periodical reviews at all levels to evaluate its suitability, adequacy and effectiveness of our business processes in order to:

- ensure the continued suitability, adequacy and effectiveness of the management system in satisfying the policies, objectives and requirements of the business and ISO 45001:2018
- ensure that the management objectives, lines of accountability, methods and procedures are effective
- identify any necessary or desired correction
- identify possible improvements

The results of all such reviews, including the conclusions as to the system's suitability, adequacy and effectiveness in meeting policy and objectives, are recorded.

HSE Management Review Input

Management review information is prepared for the Executive Leadership Team (ELT) who meet monthly.

Inputs to the Management System review include the following.

- Results of audits, external and internal;
- Status of preventive and corrective actions
- Risks and Opportunities for improvement
- Follow-up actions from previous management reviews
- Regulatory changes that could affect the HSE Management System
- Recommendations for improvement from all interested parties
- HSE Trends (incidents, injuries)
- HSE Objectives and Targets
- Workforce engagement
- Results of the evaluation of compliance with legal and other requirements

HSE Management Review Output

The output from the HSE Management review includes any decisions and actions related to the following.

1. Improvement of the effectiveness of the Management System and its processes
2. Actions
3. Resources needed

10.0 Improvement

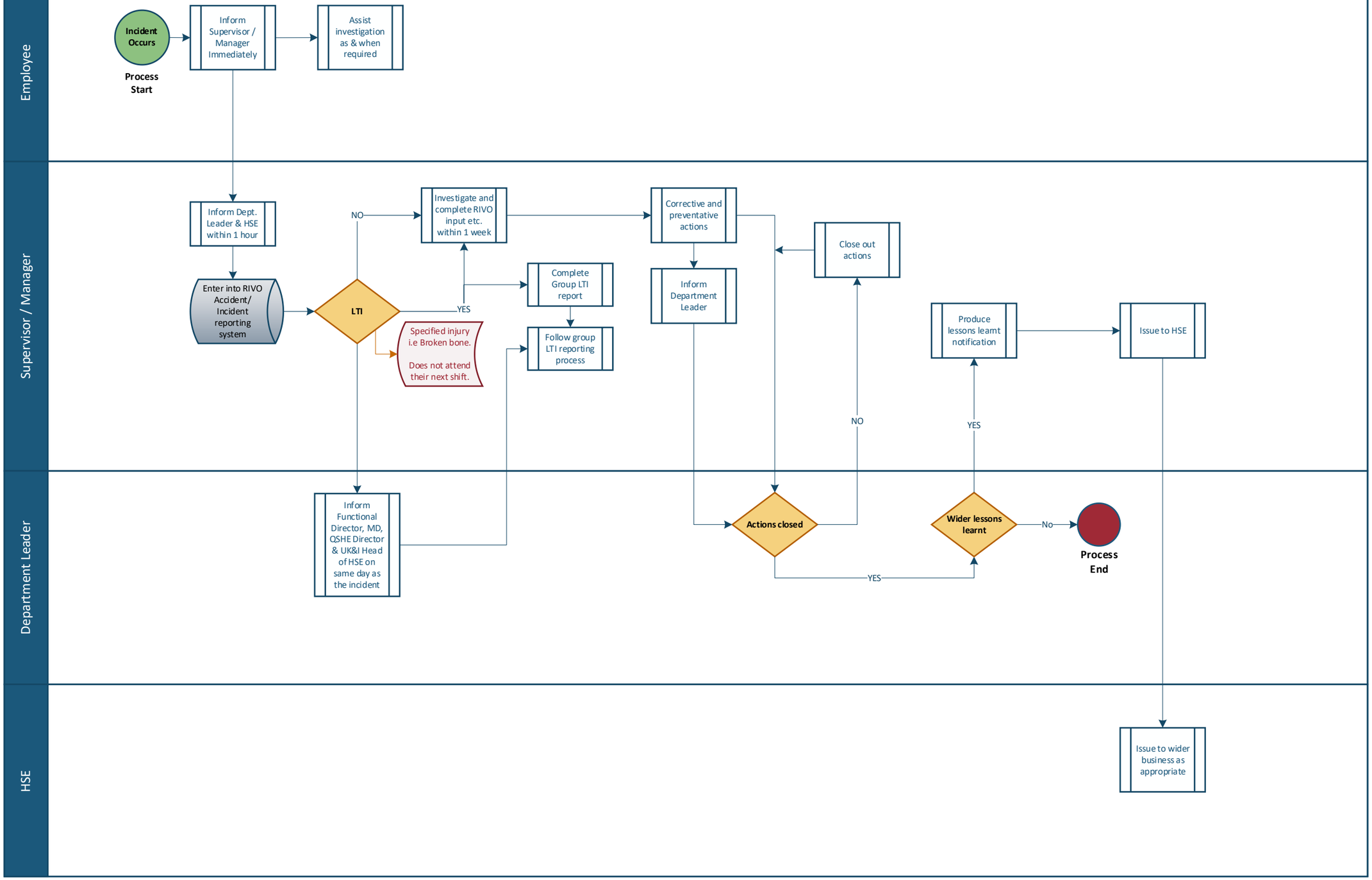
10.1 Incident, Nonconformity and Corrective Action

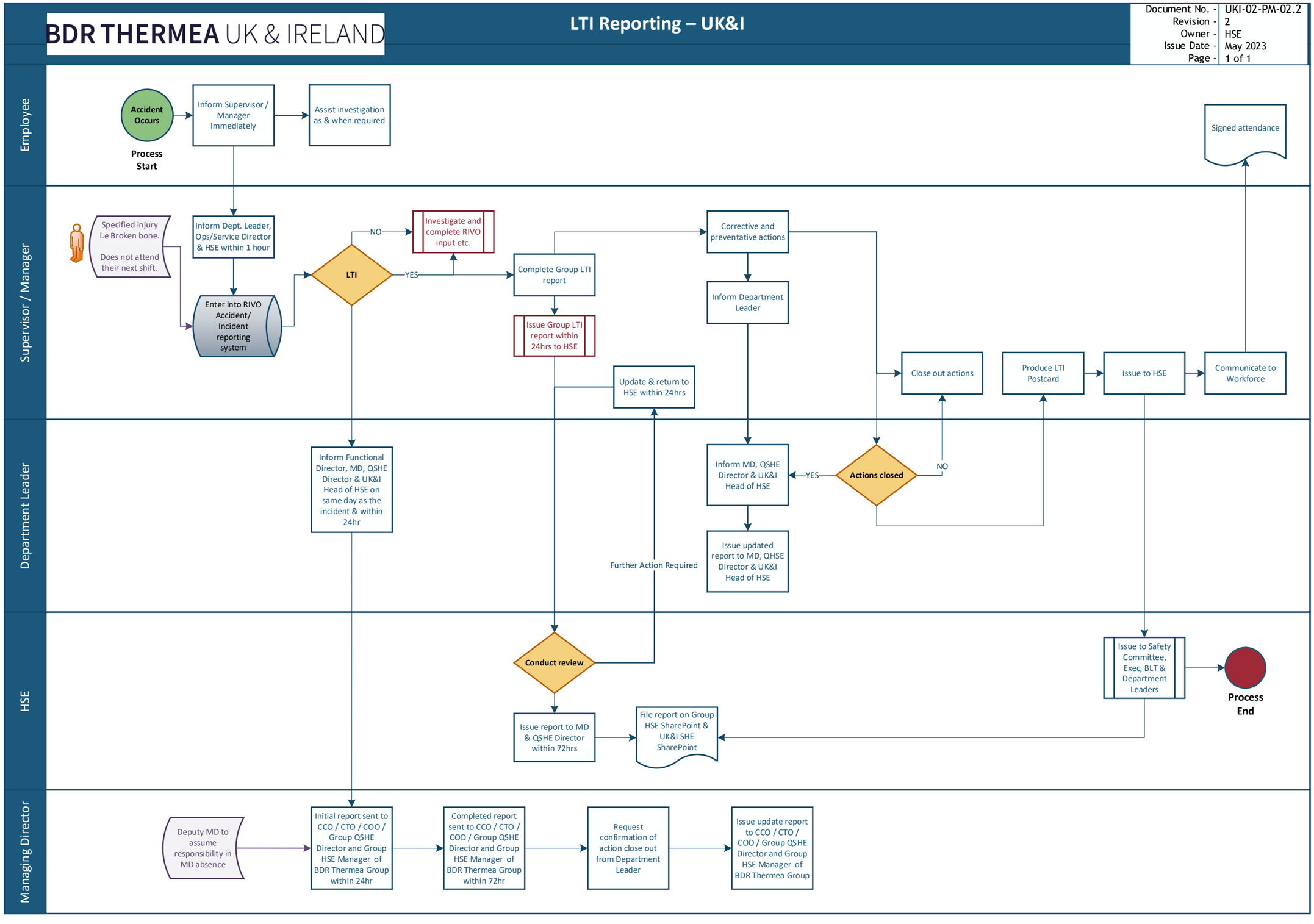
All accidents, Near Misses, Property Damage and hazards are reported on the company reporting system. The following process maps below indicate the workflow that is followed;

BDR THERMEA UK & IRELAND

Incident Reporting – UK&I

Document No. -	UKI-02-PM-02.1
Revision -	1
Owner -	HSE
Issue Date -	December 2022
Page -	1 of 1




BDR THERMEA UK & IRELAND
LTI Reporting – UK&I
Document No. - UKI-02-PM-02.2
Revision - 2
Owner - HSE
Issue Date - May 2023
Page - 1 of 1
Employee
Supervisor / Manager
Department Leader
HSE
Managing Director
Accident Occurs
Process Start
Inform Supervisor / Manager Immediately
Assist investigation as & when required
Signed attendance
Specified injury i.e Broken bone.
Does not attend their next shift.
Inform Dept. Leader, Ops/Service Director & HSE within 1 hour
Enter into RIVO Accident/ Incident reporting system
LTI
NO
YES
Investigate and complete RIVO input etc.
Complete Group LTI report
Issue Group LTI report within 24hrs to HSE
Update & return to HSE within 24hrs
Corrective and preventative actions
Inform Department Leader
Close out actions
Produce LTI Postcard
Issue to HSE
Communicate to Workforce
Inform Functional Director, MD, QSHE Director & UK&I Head of HSE on same day as the incident & within 24hr
Inform MD, QSHE Director & UK&I Head of HSE
YES
Actions closed
NO
Issue updated report to MD, QHSE Director & UK&I Head of HSE
Further Action Required
Conduct review
Issue report to MD & QSHE Director within 72hrs
File report on Group HSE SharePoint & UK&I SHE SharePoint
Issue to Safety Committee, Exec, BLT & Department Leaders
Process End
Deputy MD to assume responsibility in MD absence
Initial report sent to CCO / CTO / COO / Group QSHE Director and Group HSE Manager of BDR Thermea Group within 24hr
Completed report sent to CCO / CTO / COO / Group QSHE Director and Group HSE Manager of BDR Thermea Group within 72hr
Request confirmation of action close out from Department Leader
Issue update report to CCO / CTO / COO / Group QSHE Director and Group HSE Manager of BDR Thermea Group

Non-Conformity and Corrective Actions

Non-conformities are identified through different methods such as audits, customer complaints and data analysis. Where non-conformities are identified, they are recorded and documented as per the process through which they were found. There are different problem-solving techniques utilised ranging from basic investigation to cross-functional investigations such as Single Event Analysis (SEA) or Ishikawa (cause & effect).

All investigation findings are logged and managed through Baxi's online accident/incident management system. Corrective actions are carried out to fix the immediate issue and preventative actions identified, through investigation, in order to seek a long-term solution when necessary.

Continual Improvement

Baxi seeks to improve all aspects of the organisation using the Plan, Do, Check, Act (PDCA) cycle. Improvements are made based upon analysis of the organisations risks and opportunities.

Everyone in Baxi is responsible for Continuous Improvement. Management is responsible for identifying, investigating, and documenting the cause of repetitive non-conformance and identifying the corrective actions required to prevent recurrences of the non-conformance.

Baxi seeks to continually improve the suitability, adequacy and effectiveness of the HSE Management Systems to enhance safety, health and environmental performance by identifying opportunities through data analysis, setting of objectives based upon said data, lessons learned from investigations and continually reviewing the performance in achieving those objectives.

Issue Status of Manual

Issue	Revision Description	Authorised by	Date
1	Complete revision of the previous policy document	Paul Richards	December 2022
2	Review of entire document to align with current practices	Paul Richards	May 2023
3	Update of HSE structure and inclusion of company wide scope	Paul Richards	August 2023

All amendments to this manual will be done as per the procedure for Control of Documents and will be issued and controlled by the Management Representative