



Stericycle Ireland – Health and Safety Statement 2025

Document Author:	Claire Cull	EHS Manager Ireland	
Document Owner:	Julie Howard	Director Operational EHS	
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2. Introduction

Scope of Safety Statement

- 2.1 This safety statement deals in the main with the health and safety issues that fall within the remit of Stericycle and Shred It. Our staff offices and operations are located in the following Estates:
- 430 Beech Road Western Industrial Estate, Naas Road, Dublin 12.
 - Unit 1a Allied Industrial Estate Kylemore Road Dublin 10.
 - Shred it 6a Westgate Business Park, Ballymount, Dublin 24
- 2.2 This safety statement applies to all service locations where business operations are undertaken by the company.
- 2.3 The scope of Stericycle includes:
- Consultation, classification, packaging, transportation and recovery/disposal of Hazardous/ Non Hazardous material in compliance with relevant legislation.
 - Validation and compliance services.

3. Quality, Environment, Safety and Health Policy

Stericycle delivers innovative business solutions that protect people and brands, promote health, and safeguard the environment. We operate in highly regulated and complex arenas that have tremendous environmental and social impact. Our UK and Ireland business operates in the following areas:

- Clinical Waste Management and Hazardous Waste Management in Stericycle (SRCL Ltd);
- Secure Information Destruction in Shred-it.

This policy is applicable to all of the diverse range of services and products provided by the Company and to all of its facilities.

Throughout all of its business activities, Stericycle is committed to the continual improvement of its quality, environmental, safety and health performance and to the prevention of pollution.

The business will minimize risk and develop sustainably through the implementation of controls and procedures which align with and support this policy. To this end, Stericycle will:

- Promote a strong quality, environmental, safety and health culture through effective training and awareness;
- Comply with the requirements of BS EN ISO 9001 (Quality), BS EN ISO 14001 (Environment); BS ISO 45001 (Health and Safety); and BS EN 15713 (Secure Destruction of Confidential Material);
- Comply with all relevant environment, safety and health legislation and other identified requirements in relation to the activities of the group;
- Systematically identify and reduce, where practicable to do so, significant safety and health risks that arise from the group's activities;
- Systematically identify the environmental aspects and reduce, where practicable to do so, the associated impacts which arise from the group's activities;
- Ensure that all complaints, environmental, safety and health incidents are reported, investigated and appropriate actions are taken to prevent a reoccurrence;
- Provide a channel for raising concerns regarding confidentiality without fear, blame or recrimination;
- Periodically set, review and publish quality, environmental, safety and health objectives that align with the strategic direction of Stericycle;
- Develop and maintain a schedule of internal audits to monitor compliance;
- Provide sufficient resources to implement this policy and ensure continual improvement of the quality, environment, safety and health management system;
- Ensure that this policy is communicated to all necessary parties and is available upon request.

The ultimate responsibility for quality, environment, safety and health lies with the Stericycle UK & Ireland Senior Vice President who will ensure that it is given equal priority with other primary business objectives and the strategic direction of the business. Implementing this policy is a line management responsibility at all levels together with the participation of all employees. Staff is reminded that adherence to this policy is a condition of employment.

The policy will be revised and updated as necessary by the Director Operational HSE.



Signed:

Date: 09/01/2025

Toby Black, Senior Vice President UK and Ireland

Issue: 8

4. Safety Legislation

- 4.1 Safety and Health in the workplace is governed by the Safety, Health and Welfare Act 2005. An employer must ensure, so far as reasonably practicable, that the workplace is safe, that the equipment provided is safe, that employees are properly trained and that they work under a system of work which will help to ensure their health and safety and welfare. Employees must co-operate with the systems and the arrangements which are provided for health and safety reasons.
- 4.2 An employer must consult with his employees on health and safety issues and is entitled to the co-operation of employees in the development of safe systems and safe arrangements for the workplace.
- 4.3 The Safety, Health and Welfare at Work (General Application) Regulations 2007 to 2016 impose duties on Stericycle to carry out risk assessments and to adapt where reasonable and practical to technical progress in health and safety. The Regulations also set standards for the use of machinery, electricity, first aid, accident reporting, manual work, welfare facilities, health surveillance and the use of VDUs.
- 4.4 There is a non-exhaustive list:
- The European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 to 2017;
 - Chemicals Act 2008 (No. 13 of 2008) and Chemicals (Amendment) Act 2010 (No 32 of 2010)
 - The Safety, Health and Welfare at Work (Biological Agents) Regulations 2013 (S.I. No. 572 of 2013).

To ensure these needs and expectations can be met, the Company has compiled Legal Requirements Register applicable to its operations. This is available on Steripoint (the Company's intranet). A procedure is in place for identifying applicable legal requirements, together with the procedures for the maintenance of the registers to ensure that the information is kept up to date.

5. Arrangements for Safety, Health and Welfare

5.1 This section examines the areas that need to be addressed in the Company Safety System and the resources available for its implementation. Such examinations include costing of necessary remedial work and risk assessments.

General Arrangements

5.2 The following is an indication of the areas, which are addressed in the process:

- **Housekeeping** – The keeping of work areas and walkways in a safe and clean condition. This is done through the facility-cleaning schedule, regular auditing and management walk round's.
- **Noise** – Noise levels are currently below the 80dB threshold but if this level increases appropriate measures will be taken in accordance with the Safety, Health and Welfare at Work (General Application) Regulations 2007 to 2016
- **Equipment Maintenance** – The maintaining of work equipment on site and the implementation of a Planned Preventative Maintenance programme.
- **Testing** – Regular testing of boilers and related equipment, lifting equipment, fixed electrical and portable electrical appliances.
- **Training** – Employee training programmes.
- **Protective Equipment** – Provision of PPE based on hazard and risk assessment, CE marking and safety approval.
- **Emergency Procedures** – Provision and training on all emergency situations including fire, spillages of untreated material, incidents, driver safety and waste handling.
- **Medical Surveillance** – Company doctor available for any vaccinations, information or check-ups required.
- **Information Awareness** – Providing all members of staff with adequate information on the hazards they are exposed to and safety related responses through training.
- **Induction Course** – Safety provision for the non-employees (contractors, visitors and members of the public).
- **Safety Audits** – as per planned audit programme basis, the Safety Manager / Advisor will arrange to have safety audits carried out which will look at plant, equipment and systems of work and the training needs of employees. In addition to this the General Manager / Plant Manager / allocated person and safety representative also complete and review monthly reports. The Management will prioritise any action needed arising out of the findings and advises on preventative or corrective measures.

- **Welfare Facilities** – The Company provides:
 - Clean drinking water,
 - Hygienic washing & toilet facilities,
 - Hygienic facilities for taking meal breaks,
 - Means to heat drinks & food at meal breaks,
 - Lockers for clothes.
- **Transport/DGSA** - Stericycle have also appointed a Dangerous Goods Safety Advisor in accordance with current legislation.
- **Visual Display Unit's** - The Company will honour its obligations under the Safety, Health and Welfare at Work (General Application) Regulations 2007 Chapter 5 of Part 2; it will in relation to display screen equipment carry out a risk assessment of each workstation and will adopt the recommendations.
- **Assessment** - An assessment should be carried on all VDU stations on-site. All employees are responsible for their own work area.
- **Eye Tests** - Undergoing an eye examination will not incur any financial cost on the employee.

Emergency Training

5.3 All staff, subcontractors and visitors shall be familiar with the following in the event of an emergency situation arising:

- Know where the nearest emergency exit is;
- Know where their assembly point is;
- Ensure their supervisor knows they are on site.

5.4 All assembly points shall be issued individually and posted up around the site:

- On discovery of a fire the alarm shall be raised and staff shall proceed to the nearest assembly point;
- On hearing the fire alarm staff shall proceed to their assembly point;
- Emergency facilities and equipment such as fire extinguishers should not be tampered with except in emergency situations. All staff shall be briefed on the different types of extinguishers and their uses.

Welfare Facilities

5.5 The following welfare facilities are provided at Stericycle:

Medical & First Aid

- Trained First Aid Representatives;
- First Aid Equipment;
- Company Practitioner (Long mile Medical Centre & Medmark Occupational Healthcare);
- All staff shall be made aware of the first aid facilities available on site;

- First aid boxes are available in clearly marked locations throughout the site. The contents of each first aid box shall be checked at regular intervals by a named individual, responsible for its upkeep.

Food & Drink Facilities

- Canteen including fridge, microwave.

General

- Sanitary and washing facilities;
- Showers and lockers rooms;
- Provision of protective clothing;
- Fire fighting equipment.

Hygiene

5.6 Stericycle will ensure that adequate welfare facilities are provided in order that strict hygiene procedures are maintained. In addition all staff shall observe the following:

- Smoking, drinking or eating are strictly forbidden (other than in designated areas);
- Thoroughly wash hands before and after each procedure and before handling any foodstuff;
- Personal Protective Equipment should be worn in designated areas at all times.

6. Assignment of Duties and Responsibilities

Employer

- 6.1 The Regional Manager Operations ROI has site responsibility for health and safety. It is his/her duty to ensure that every member of staff has a copy / access to the Company Safety Statement and is fully familiar with its contents. The Manager Operational Health, Safety and Environmental must also ensure that all staff is aware of all written safety procedures, standards and practices.
- 6.2 It is the duty of management and the safety committee to ensure (as far as is practicable) that:
- a) Safe systems of work are in place;
 - b) Effective steps are taken to ensure that all persons employed in the place of work are familiar with means of escape in case of fire or other emergency evacuation;
 - c) No member of staff shall operate machinery or carry out an activity until training has been carried out by a responsible person (See training records);
 - d) Work equipment is maintained in a safe condition, with appropriate inspections and approval to ensure the safety of persons using such equipment and others who may be exposed to risk from work equipment;
 - e) Hazards (such as damaged fittings, spillages or trip hazards) in the areas occupied by staff are reported and eliminated as quickly as possible after they occur or come to the attention of relevant parties;
 - f) Employees receive appropriate training in:
 - Operating procedures pertinent to their work activities
 - PPE
 - Manual handling and manual handling aids
 - The storage compatibility of various hazardous substances
 - The co-loading of hazardous substances
 - The interpretation of material safety data sheets
 - Dangerous goods training
 - g) Vehicles are in a fit condition for use and are properly maintained and those authorized to use vehicles are appropriately trained and certified to do so;
 - h) Safe work practices and procedures are followed including where necessary the use of Personal Protective Equipment;
 - i) Employees have been made aware of the provisions of the Safety Statement and of written safe practices and procedures relevant to their areas of work. All employees are informed of content and location of safety statement during induction training;
 - j) All occupational injury / illness and near misses or dangerous occurrences are reported in writing by the site management to the Manager Operational HSE ensuring that any necessary follow-up action is taken without delay. The Manager Operational HSE must then inform the Health & Safety Authority where necessary;
 - k) Safety audits are carried out at each site to ensure that training in safety and the use of Personal Protective Equipment is carried out on an ongoing basis;
 - l) Monitor the standards of housekeeping in all areas and implement the procedure to ensure that this is maintained to as high a standard as is reasonable practical;

- m) Adequate precautions must be taken when a new or special hazard is about to be introduced into the Company;
- n) Ensure employees are made aware of the risks involved in the handling of chemicals & hazardous substances;
- o) Maintain a fire safety book, containing details of training, fire drills, fire related plant and equipment;
- p) Provision of appropriate first aid facilities and supplies;
- q) To have this safety statement available in a form manner and language that is reasonably likely to be understood to the attention of all employees at least annually, new employees and subcontractors.

Regional Manager Operations ROI

- a) Ensuring that the plant is operating in compliance with the Environmental Licenses, Permits, Authorisation, Registration Documentation and all other environmental laws, regulations and other requirements, including the Duty of Care;
- b) Ensuring that all required data under the Environmental License, Permit, Authorisation or Registration; or BMS is gathered and recorded in a timely and efficient manner;
- c) Ensuring that the plant is being operated efficiently and that environmental, health & safety and quality issues are taken fully into account throughout the site, including identifying the environmental aspects and health & safety risks of goods and services, also past, present and future activities;
- d) Ensuring that effective environmental and health & safety protection equipment is available at all sensitive areas of the site, and that appropriate user instructions are to hand;
- e) Operating the Incident Reporting Procedures;
- f) Liaising with the Water Utilities supplier on all aspects of water supply, including compliance with the discharge consent;
- g) Implementing the BMS and ensuring that all environmental, health & safety and quality control procedures are being adhered to and understood by all staff and taking appropriate corrective and preventive action;
- h) Implementing all environmental improvement plans for the site;
- i) Providing technical input to the Management Team to assist in the resolution of compliance problems;
- j) Maintaining the Site Plan and identifying, in consultation with other members of the Safety, Health and Compliance / site departments, all areas of environmental and health & safety risk and potential liability;
- k) Reviewing all environmental and health & safety data and performance records for possible inclusion in the Company's impacts and aspects register and/or objectives and targets;
- l) Controlling the time-tabling of waste/delivery vehicles in and out of the site and ensuring receipt/dispatch of the correct documentation;
- m) Keeping records on all registered waste carriers and licensed waste disposal facilities for the Company's own wastes;
- n) Customer relations and the resolution of sales/administration problems;
- o) Fielding waste related environmental queries from customers and ensuring that an authoritative response is forthcoming from appropriate managers;

- p) Ensuring that the environmental and health & safety implications of all process operations, materials handling and storage activities are properly understood by all operational staff;
- q) Ensuring site installations and drainage systems are protected in emergencies, particularly in the event of spillages;
- r) Co-ordinating the activities of operational and maintenance personnel to safeguard continuity of operations, having full regard to environmental and health & safety issues;
- s) Overseeing modifications to plant and equipment, Management Team recommendations or to meet the requirements of management;
- t) Ensuring proper internal communications between management and operational staff on all issues, including environmental and health & safety issues;
- u) Ensuring that all operations under his/her control are carried out in accordance with the site's Environmental Licence, Permit, Authorisation and/or Registration Documentation and in compliance with the BMS;
- v) Advising on training requirements particularly in areas having an environmental, health & safety or quality impact;
- w) The co-ordination of all training activities;
- x) Keeping and updating all training records;
- y) Carry out training reviews for all members of staff on a periodic basis;
- z) Will develop, maintain and review emergency response systems.

Manager Operational HSE

- a) With the Safety, Health and Compliance Department acting as overall safety and health co-ordinator, the Plant Managers and Manager Operational HSE are responsible for periodically reviewing the performance and standards achieved in relation to health and safety at the locations;
- b) The Manager Operational HSE in consultation with the Plant Managers reports on health and safety standards to the Regional Manager Operations ROI making appropriate recommendations on policy and priorities and capital spending;
- c) The Manager Operational HSE, through the Plant Managers, ensure that corporate health and safety policies and legislative requirements are implemented at the sites.
- d) To keep abreast with all relevant legislation and other requirements to which the organisation subscribes and to inform the Management Team on any changes to health & safety legislation and regulations that will have an impact on Stericycle's operations and subsequently any changes that will be required to the BMS;
- e) Generating and co-ordinating all health and safety activities, contingency planning for fires, accidents and other emergencies, such as spillages and other relevant incidents;
- f) To review and respond accordingly to all Incident Reports.

Plant Manager

- a) The Plant Manager in consultation with the corporate management of Stericycle is responsible for ensuring that personnel, finance and physical facilities at the location are adequate to meet the commitments of the general policy statement and the detailed commitments on control of hazards which are made later in this statement.
- b) The Plant Manager has responsibility to periodically review the performance and standards achieved in relation to health and safety at the location and to consider all of the risks to which employees, contractors and visitors, are exposed. The Plant Manager is committed to consultation with staff and managers at all levels on issues of health and safety:
 - To apply the corporate policies on health, safety and welfare at the location;
 - To co-ordinate and priorities for action, any health and safety issues raised by safety and health audits, the safety committee / representative or by individual employees;
 - To ensure that all systems of work are regularly reviewed for health and safety reasons;
 - To ensure that plant, equipment, buildings and facilities are maintained to a high standard and are as safe as reasonably practicable;
 - To ensure that new systems and equipment being introduced are as safe as practicable;
 - To co-ordinate the work of the safety committee / representative and to ensure that recommendations are actioned appropriately;
 - To consult with individual employees on health and safety issues which affect them and take appropriate action arising out of the consultation;
 - To ensure that all statutory and recommended safety inspections/certifications are recorded for equipment such as lifting machinery, air-receivers, and fire equipment;
 - To monitor safety and health training needs and to advise the General Manager.

Individual Employees

- a) Individual employees are obliged to adhere to safe systems of work as outlined in this safety statement and to the instructions provided by their Manager in relation to health and safety. They are also obliged to use the protective equipment provided and the information they have gained in training courses to protect their own health and safety and the health and safety of others.
- b) Employees are obliged to co-operate with Management on health and safety issues and must bring any defects in plant, equipment or systems of work to the attention of their Supervisors or Manager without delay.

General Duties of Employees – Safety, Health and Welfare Act 2005

It shall be the duty of every employee while at work:

- a) to take reasonable care for his / her own safety, health and welfare and that of any other person who may be affected by his / her acts or omissions while at work;
- b) to co-operate with his / her employer and any other person to such an extent as will enable his / her employer and any other person to comply with any of the relevant statutory provisions;
- c) to use, in such manner so as to provide the protection intended, any suitable appliance, protective clothing, convenience, equipment or other means or thing provided (whether for his / her use alone or for use by him / her in common with others) for securing his / her safety, health or welfare while at work; and
- d) to report to his / her employer or his/ her immediate supervisor, without unreasonable delay, any defects in plant, equipment, place of work, or system of work, of which he/she becomes aware and which might endanger safety, health or welfare.
- e) No person shall intentionally or recklessly interfere with or misuse any appliance, protective clothing, convenience, equipment or other means or thing provided in pursuance of any of the relevant statutory provisions or otherwise, for securing the safety, health or welfare of persons arising out of work activities.

Reporting of Accidents and Dangerous Occurrences

- 6.3 All accidents and incidents must be reported immediately to the Regional Manager Operations ROI / Plant Manager / responsible person. The Regional Manager Operations ROI / Plant Manager / responsible person must then report this as soon as is reasonably practicable to the Manager Operational HSE via the online reporting system.
- 6.4 The appropriate Stericycle online incident report form will be completed by the Regional Manager Operations ROI / Plant Manager / responsible person.
- 6.5 An email alert will be sent to the Manager Operational HSE. All investigations will be carried out by the Manager Operational HSE and the Regional Manager Operations ROI / Plant Manager.
- 6.6 If a serious accident / incident occurs, the Manager Operational HSE must be notified immediately.
- 6.7 All serious accidents / incidents must be recorded on the SEMS online reporting system. All accidents/ incidents must be reported to the Manager Operational HSE not later than 1-day following the accident/incident. If the incident / accident exceeds 3 consecutive days (excluding the day of the accident itself and including weekends), it must be reported to the Health & Safety Authority (HSA). Accident / Incidents records are maintained by the Manager Operational HSE and investigations and corrective actions protocols are regularly reviewed.
- 6.8 The Company Manager Operational HSE will then complete the IR1 or IR3 if required and forward to the HSA.

Abrasive Wheels

6.9 Once an employee has successfully completed training in the correct use of abrasive wheels, they can be authorised in writing by the Company to use / mount abrasive wheels. Records of this authorisation will be maintained.

6.10 The company maintains a list of personnel who are competent to use abrasive wheels.

Site Location	SRCL Beech Rd
Specific equipment authorised to use / mount:	4.5 & 9 inch angle grinder
Note any equipment specific controls:	110V and PAT tested
Authorised by name:	Maintenance Manager Brian Buckley
Date of authorisation:	Exp 31.03.25

Employee name:	SRCL Kylemore Rd
Specific equipment authorised to use / mount:	4.5 & 9 inch angle grinder
Note any equipment specific controls:	110V and PAT tested
Authorised by name:	Maintenance Manager Brian Buckley
Date of authorisation:	Exp 31.03.25

Legionella Risk Assessment

- 6.11 Stericycle periodically contract a competent third party to complete an assessment to identify and assess the risk of exposure to legionella bacteria from work activities and water systems on the premises and any precautionary measures needed.
- 6.12 The Duty Holder is responsible for ensuring the risk assessment is carried out and the appointment of a competent person or persons to help undertake the measures needed to comply with the findings of the risk assessment.
- 6.13 The identified lines of communication are shown below;

Duty Holder: The person on whom the statutory duty falls.	
Name	William Gardiner
Role	Regional Manager Operations ROI
Responsible Person: Responsibility for implementing the risk assessment recommendations and the risk management program.	
Name	Joe Mahon – Beech Road, William Garnder (acting until new person appointed) – Kylemore Road Declan McMonagle – Dublin SID Assistant Service Manager (Transport) – Lee Kavanagh
Role	Plant Manager
Deputy Responsible Person: Responsibility for implementing the risk assessment recommendations and the risk management program in the absence of the responsible person.	
Name	Brian Buckley – Stericycle only
Role	Maintenance Manager

7. Controls of Contractors

- 7.1 Contractors, sub-contractors, owner drivers, hauliers and other persons working in or entering Stericycle locations/sites are obliged to adhere to all safety rules and regulations required by Stericycle and all relevant health and safety legislation and regulations.
- 7.2 Contractors must have appropriate current insurance cover for Employers, Public and Product Liability. Copies of the insurance certificates will be presented to and checked by the Plant Manager, before work is started.
- 7.3 Contractors must liaise with the Plant Manager, / Supervisor or a person assigned by the Plant Manager, / Supervisor.
- 7.4 Contractors must ensure that they and their employees are competent and trained to carry out the work undertaken by them.
- 7.5 Contractors must ensure that they and their employees observe all safety rules and procedures (including isolation procedures) required by Stericycle.
- 7.6 Contractors must ensure that they and their employees wear the protective equipment appropriate to the area they are working in. Safety signs and instructions must be observed and adhered to.
- 7.7 Contractors must take all due care of their own safety, the safety of their employees and all others affected by their work.
- 7.8 Stericycle equipment and the services of Stericycle personnel may only be used if approval is given by the Manager/Supervisor.
- 7.9 Contractors must report all accidents and dangerous occurrences to the Manager/Supervisor.
- 7.10 Contractors will comply fully with and carry out their work in accordance with the requirements of the relevant Health and Safety legislation and regulations.
- 7.11 Contractors must ensure that plant/equipment brought on to a Stericycle location / site is in good and safe condition and has, where necessary, valid certification.

8. Control of Visitors**Authorised Entry**

- 8.1 All visitors to Stericycle locations/sites must be authorised or accompanied by a Stericycle liaison person. All visitors must abide fully by the Safety Rules and Regulations required by Stericycle.

Safety Signs

- 8.2 Visitors must heed all warning signs/signals and stay clear when required to do so.

Protective Equipment

- 8.3 Hard hats and protective footwear must be worn in all production/operational areas.
- 8.4 In some areas additional protective equipment including hearing, eye and/or respiratory protection may be required. The Stericycle liaison person will advise the visitor in this regard.

Mobile Plant

- 8.5 All visitors must keep well clear of mobile plant and make drivers aware of their intentions if they wish to approach such machines.
- 8.6 Visitors must not climb onto equipment and must never ride on a vehicle except where passenger accommodation is provided.
- 8.7 Visitors must never attempt to drive or operate any machine unless they have been trained and are authorised to do so.
- 8.8 All visitors driving their own vehicle on a Stericycle location or site must ensure that they give way to Stericycle production traffic, stay on approved grounds, park only in an approved area or as directed by the Stericycle liaison person and park so that their vehicle does not become an obstruction or hazard.

Machinery

- 8.9 Visitors must not attempt to operate any machinery in or on a Stericycle location /site unless authorised to do so by the Stericycle liaison person.
- 8.10 Visitors must be aware that machines, plant and equipment may be started from remote control cabins, so they must keep clear even when machines and / or plant is not running.

Accidents and Dangerous Conditions

- 8.11 Visitors must report all accidents/dangerous occurrences and dangerous condition to Stericycle liaison person/supervisor without delay.

Safety Information

- 8.12 Where a visitor is in doubt about Health and Safety he/she should contact the Stericycle Manager, Supervisor or liaison person.

9. Personal Protective Equipment

Policy 4-204

Managing Personal Protective Equipment

1. Purpose

- 1.1 The purpose of this policy is to establish a framework for the management of Personal Protective Equipment (PPE).

2. Scope

- 2.1 This policy applies to all Stericycle facilities and team members in the international business.

3. Definitions

- 3.1 **At Work** – Any activities undertaken for or on behalf of Stericycle, both at and away from Stericycle facilities.
- 3.2 **Contractor** – Any person that is not a Stericycle team member who comes onto Stericycle facilities to carry out work.
- 3.3 **Personal Protective Equipment (PPE)** – Stericycle approved clothing, shoes, gloves, glasses/goggles and other such items meant to protect team members from potential exposure to workplace hazards.
- 3.4 **Reasonably Practicable** – That which is reasonably able to be done to ensure health and safety, taking into account and weighing up relevant matters including the likelihood of the hazard concerned occurring and the severity of potential injury, against the cost in time, money and effort of implementing control measures to eliminate or reduce the risk of the hazard occurring. The cost must greatly outweigh the risk and severity of the hazard occurring if the control measures are not to be implemented.
- 3.5 **Visitor** – Any person who comes onto Stericycle facilities that is not a contractor and is not a site team member. For the purpose of this procedure this will include Stericycle team members who are not based at the specific site.
- 3.6 **Team Members** – All employees of Stericycle, including permanent and temporary employees and those provided by employment agencies.

4. Responsibilities & Governance

- 4.1 **Vice President (VP) EHS International** – Responsible for monitoring the implementation of this policy across the international business.
- 4.2 **EHS Area Director / Senior Manager EHS** – Responsible for monitoring the implementation of this policy in areas under their control and for all team members under their supervision and notifying the VP of EHS International of any serious issues relating to the procurement or use personal protective equipment in areas under their control.
- 4.3 **EHS Managers** – Responsible for providing support to line managers regarding PPE selection, to ensure that PPE is suitable for the tasks/activities and complies with relevant standards. Are responsible for supporting the development of information and training relating to PPE use and for monitoring the implementation of this policy across sites under their control.

4.4 **Manager/Supervisors** – Responsible for ensuring that the requirements of the PPE policy are implemented at the site/areas under their control.

4.5 **Team Members** – Responsible for complying with the requirements of the PPE policy.

5. Policy Statement

5.1 It is the policy of Stericycle that all team members, that are at risk of injury/illness while at work, are provided free of charge, appropriate PPE for the task or activity being undertaken, to allow, so far as is reasonably practicable for adequate protection from injury and/or illness.

5.2 All contractors who attend a Stericycle facility will be expected to bring with them appropriate PPE to allow for adequate protection from injury and/or illness while they are completing their work.

5.3 All visitors to Stericycle facilities must wear the PPE required and will where required be provided free of charge with appropriate PPE to allow, so far as is reasonably practicable for adequate protection from injury and/or illness.

6. Accountability

6.1 Stericycle regards compliance with this policy to be a significant duty of all Stericycle team members.

6.2 Disciplinary action may be implemented following the guidance set out in Policy 4-109 EHS Accountability if any team member intentionally disregards and/or neglects to comply with the requirements set out in this work instruction.

7. Related Policies & Procedures

7.1 SP4-204 Managing Personal Protective Equipment Procedure

7.2 Policy and Procedure 4-107 Risk Management

7.3 Stericycle Global Environmental, Health and Safety Policy Statement

8. Requests for Additional Information, Interpretation & Document Ownership

8.1 Document ownership belong to:

Document Owner:	Stuart Budd	Vice President, EHS International
Document Author:	Philip Purcell	EHS Programs Manager

8.2 For all enquiries related to this document or change requests contact EHS-ProgramsTeam@stericycle.com

9. Revision History

9.1 Revision History:

Version	Issued	Overview of Changes
1.0	November 01 2021	<ul style="list-style-type: none"> New Policy
2	01/03/2023	<ul style="list-style-type: none"> Updated Section 6 Accountability statements to include EHS Accountability Policy. Updated review requirements in 8.2. Updated Document Retention Periods in Section 10.

9.2 This policy must be reviewed when changes occur to applicable legislation and/or company operations that prompt revision of this policy.

10. Document Retention

10.1 This policy shall be retained electronically until reviewed and updated.

10.2 Hard copies of this policy must be disposed of after use using appropriate secure document destruction methods.

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Risk Assessment

- 9.1 Refer to the risk assessments on Steripoint / site to understand the hazards, risk and control measures identified and to be followed to reduce hazards to as low as reasonably practicable or lower.
- 9.2 All employees undertaking the tasks identified in the risk assessments must as a minimum wear the Personal Protective Equipment (PPE) identified.
- 9.3 A permit to work may also be required prior to the start of the task and may identify additional control measures / PPE that may be required to undertake a specific task.
- 9.4 A task must not be undertaken unless the risk assessment / dynamic risk assessment has been completed and competent personnel are available undertaking the task.

10. Dignity at Work

- 10.1 The Company recognises the moral and legal rights of its employees to be treated with dignity and respect and the right to perform their duties in an environment free from harassment of any kind.

Definition of Harassment

- 10.2 Harassment is defined as 'any unwelcome, verbal, non-verbal behaviour, which is objectionable or causes offence to others'. Although sexual and racial harassment are the best known forms of the activity, people can be harassed, bullied or victimised because of their age, ethnic origin, disability, religion or appearance. In fact any activity which singles out one employee from his/her colleagues can constitute harassment.
- 10.3 Whether or not an employee feels that he/she is being harassed will depend upon the individual's perception. Someone else may perceive an action which one individual may shrug off as workplace fun as a threat or an insult. Also an individual who is accused of harassment may not even be aware that his/her behaviour was causing offence.

Harassing and Discriminatory Behaviours

Sexual

- Unwelcome sexual remarks, such as jokes, innuendo, and verbal abuse;
- The display of pornographic pictures or sexually suggestive subject matter and the display of pin-ups which may cause offence to others;
- Unwelcome remarks about a person's dress, physical appearance or marital status;
- Behaviour which condemns ridicules or physically threatens a person because of their sexuality;
- Unwelcome physical contact or demands for sexual favours.

Racial

- Racially derogatory remarks or racist jokes, whether within the hearing of the offended individual or not;
- The display of racially offensive material or graffiti, insulting behaviour, threats or physical assault, isolation or non-co-operation at work.

Disabled People

- Harassment, undignified treatment, ridicule of people because of their disability, vulnerability or actual or perceived reduced independence.

Bullying and Victimisation

- The intentional intimidation or belittling of someone by an individual or a group through the misuse of power or position which leaves them feeling hurt, upset, vulnerable or helpless; and where a person is treated less favourably than others because of any of the above or because an individual has complained about discrimination against them or other people.

Religious Discrimination

- Behaviour which fails to acknowledge the rights or needs of people with different beliefs or practices.

Age Discrimination

- Ridiculing or demeaning behaviour addressed towards people of a particular age;
- Refusal of promotions or other job offers on the grounds of age.

Policy Statement

- 10.4 The Company has a legal and corporate duty to deal with workplace harassment and promote good working conditions for its employees. The Company has a responsibility to:
- Understand the different forms of harassment and maintain a safe working environment which includes preventing the occurrence of harassment at work;
 - Be aware of the policy, its operation and ensure that all employees understand and adhere to it;
 - Act immediately and within the procedure whenever a complaint of harassment has been made;
 - Discourage behaviours identified as inappropriate and to take action as and when they occur. Ensure that all complaints of harassment, whether formal or informal are responded to and investigated.

Procedural Guidelines

- 10.5 Harassment is an extremely personal matter and informal/formal procedures will be followed when dealing with such cases. In the first instance, there is a greater emphasis on investigation and action at an informal level and by the consent of the complainant. If this is inappropriate, then the formal procedure will be followed.
- 10.6 Managers will be supported by the HR Department to instigate a formal meeting with the employees concerned.
- 10.7 Where harassment is proven, possible disciplinary action could occur for the harasser, up to and including dismissal depending on the impact, nature and seriousness of the proven harassment.
- 10.8 Where harassment is not proven due to insufficient evidence, managers will monitor the situation

closely in the future.

- 10.9 If allegations are proved to be unfounded i.e. malicious then appropriate disciplinary action will be taken against the complainant.
- 10.10 Appropriate counselling can also be offered to the alleged harasser.

11. Immunisation Policy

11.1 It is the policy of Stericycle to ensure that, in as so far as it is reasonably practicable, that employees that are at risk of acquiring blood borne diseases from handling infectious wastes are protected by immunisation.

11.2 Following an assessment of activities and risks the following job roles are deemed to be in the at risk category:

Job Role	Risk
Operators (including temporary employees and agency staff)	High
Shift Supervisors / Team Leaders	Medium
SQ Collection Vehicle Drivers	High
LQ Collection Vehicle Drivers + SID drivers & Plant Operatives	Medium
Plant Manager	Medium
Regional Manager Operations ROI / Transport Managers	Low
Other Managers	Low

11.3 Those staff considered being at high or medium risk, not already immunised, will receive immunisation by either the Company's doctor / occupational health provider or by their own GP. Where immunisation is provided by an employee's GP and the GP levies a fee the Company will reimburse the employee on the production of a receipt.

11.4 Where an employee elects not to be immunised or where an employee fails to develop antibodies following vaccination then they must sign a declaration to this effect acknowledging the increased risk of acquiring a blood borne disease in the event of a needle stick or sharps injury, skin abrasion or cut or contact with eyes mouth or saliva.

12. No Smoking Policy

12.1 The Company operates a no smoking policy, which means smoking is not permitted in any building, reception area, meeting room, office, Company vehicle or any other designated smoking area.

Reasons for Policy

12.2 The policy has been designed to protect both employees from the ill health and nuisance effects of smoking and passive smoking based upon existing legislation in the UK and Ireland.

Guidelines

12.3 Smoking is restricted to designated smoking areas with ash trays for collection of smoking debris. These areas will be clearly communicated to employees, visitors, contractors and agency workers etc.

12.4 Prior to smoking in a designated area, anyone who has been engaged in any work other than office work, in a clean environment, should ensure that they have washed to prevent any risk of hand to mouth contamination.

12.5 Smoking is forbidden when handling any equipment, substance or packages at work examples are: handling clinical waste, loose or bins; handling samples; carrying out maintenance tasks on any vehicle, plant or equipment.

12.6 People working for, or on behalf of, the Company on other organisations' sites must adhere to the site's smoking rules if they choose to smoke.

12.7 Smoking in a designated no smoking area or whilst carrying out a task which has been defined as a no smoking task is a disciplinary matter and may result in disciplinary action being taken in accordance with the procedure.

12.8 Further guidance on the above can be obtained from the HR Department.

13. New and Expectant Mothers

13.1 An employee is advised to inform their employer of their pregnancy at the earliest possible stage in order for the employer to carry out a risk assessment specific to the expectant mothers' duties.

Relevant Legislation

- The Safety, Health and Welfare at Work (General Application) Regulations 2007, Part 6, Chapter 2.
- The Safety, Health and Welfare at Work Act 2005.
- Maternity Protection Acts 1994 and Amendment Act 2004.
- Pregnant Workers' Directive (92/85/EEC).

13.2 On receiving notification that an employee is pregnant the Company will assess the specific risks to that employee which may encompass some or all of the hazards below. The employer will assess the risk and act to ensure there is no damage to health by adjusting the working conditions appropriately or providing suitable alternative work if required.

13.3 The table below categorises the hazards that may be presented to new or expectant mothers.

Hazard	Risk	How to Avoid the Risk
VDU Work	Work with VDU's The levels of ionising and non-ionising electromagnetic radiation which are likely to be generated by display screen equipment are well below those set out in international recommendations for limiting risk to human health created by such emissions and the UK's National Radiological Protection Board does not consider such levels to pose a significant risk to health.	No special protective measures are therefore needed to protect the health of people from this radiation.
Physical shocks vibration or movement	Regular exposure to shocks i.e. a sudden severe blow to the body or low frequency vibration for example driving or excessive movement may increase the risk of miscarriage. Long term exposure to vibration does not cause foetal abnormalities but often occurs with heavy physical work so there may be an increased risk of prematurity or low birth weight.	There are no such threats on-site. Avoid work likely to involve uncomfortable whole body vibration or where the abdomen is exposed to shocks or jolts Breast feeding workers are at no greater risk than other workers.
Manual handling of loads or where there is a risk of injury.	As the pregnancy progresses especially after 28 weeks a pregnant worker is at greater risk. Breast feeding workers are at no greater risk than other workers.	The amount of manual handling involved in the job is minimal. Specific needs of the worker may need to be addressed and aids for her to reduce the risk may be introduced.
Noise	There are no specific risks to new or expectant mothers or to the foetus, but prolonged exposure to loud noise may lead to increased blood pressure and tiredness.	New mothers are at no greater risk than other workers.
Ionising radiation	Significant exposure to ionising radiation is harmful to the foetus and this is recognized by placing limits on external radiation dose to pregnant women. If a pregnant or nursing mother works with radioactive liquid or dusts there can cause exposure of the foetus through ingestion or via contamination of the mother's skin and transfer across the placenta to the foetus or by breast feeding to the baby.	Dose-meter to be worn by any pregnant personnel who work on the factory floor. All work in the lab to be avoided or kept as low as reasonably practicable.










Hazard	Risk	How to Avoid the Risk
Biological Agents	Biological Agents are known to cause abortion of the foetus, or physical and neurological damage. These agents are included in the Safety, Health and Welfare at Work (Biological Agents) Regulations 2013 (S.I. No. 572 of 2013). Many of the biological agents in these risk groups can affect the unborn child if the mother is infected during pregnancy. These may be transmitted to the baby through the placenta while the child is in the womb or during or after birth from breastfeeding or close physical contact between mother and child. Examples of agents include Hepatitis A&B HIV herpes, TB, Syphilis, Chickenpox and Typhoid.	Stericycle employees are immunised BMS/9.02 against Hep B however as Stericycle sites are licensed to accept infectious waste it is appropriate for the pregnant worker to avoid exposure to the Waste Awaiting Processing altogether to rule out any potential risk.
Chemical Agents	There are about 800 substances labelled with these risk phrases which should be avoided at all costs; R40: Possible risk of irreversible effects, R45: May cause cancer, R46: May cause heritable genetic damage, R61: May cause harm to the unborn child, R64: may cause harm to breastfed babies	With the hazardous transfer station the instance of these substances may be quite frequent. All waste arrives in UN approved packaging and is clearly labelled hence no actual handling of the waste goes on on-site. However those who hold management positions or are employed in H&S services may occasionally spend time in this area. The amount of time spent in this area should be kept as low as reasonably practicable and in the event of a spillage or emergency the pregnant worker should immediately vacate the area and designate another person to clean up.

14. Hazardous Materials

- 14.1 A safety data sheet (SDS) and assessment is held on file for every substance or article used in this plant and is available for reference at any time.
- 14.2 Plant Managers must keep the list of SDS and assessment on file updated as new substances enter the workplace.
- 14.3 All precautions listed in the SDS and assessment shall be implemented on Stericycle sites.
- 14.4 In the event of an accident involving a hazardous substance the relevant SDS / assessment sheet shall be made available immediately to medical staff.
- 14.5 Employees are made aware of this file and can consult it at any time.

Chemical Information for Employees / Chemical Labelling

- 14.6 All dangerous substances will carry a hazard warning sign.
- 14.7 The label provides vital information. Read the label, it is your safeguard.
- 14.8 Learn the meaning of the following symbols. They indicate that a substance is a potential health hazard.

	Acute toxicity, Very toxic (fatal), Toxic etc		Harmful to the environment
	Gasses under pressure		Oxidising gases, oxidising liquids, oxidising solids
	Harmful skin irritation, serious eye irritation		Respiratory sensitiser, mutagen, carcinogen, reproductive toxicity, systemic target organ toxicity, aspiration hazard
	Flammable gasses, flammable liquids, flammable solids, flammable aerosols, organic peroxides, self-reactive, pyrophoric, self-heating, contact with water emits flammable gas		Corrosive (causes severe skin burns and eye damage), serious eye damage
	Explosive, self-reactive, organic peroxide		

When using chemicals in the workplace:

Do

- Read and understand the label and ask questions if you don't understand;
- Follow safe work procedures;
- Read and follow instructions before use;
- Use and look after any personal protective equipment, which is recommended and provided;
- Wash your hands before going to the toilet or eating and drinking.

Don't

- Transfer chemicals into unmarked containers;
- Use flammable chemicals near sources of ignition;
- Mix chemicals unless you are sure they don't react;
- Eat, drink or smoke while working with a hazardous substance;
- Keep food or drink near hazardous substances.

Transport of Hazardous Goods

- 14.9 All Stericycle drivers hold an ADR Driver Licence for chemical classes transported.
- All chemicals are transported in accordance with the European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 to 2017.
- 14.10 Stericycle transport dangerous goods in accordance with the requirements of the ADR Agreement. Packaging, labelling etc. is in accordance with the requirements of the ADR.
- 14.11 During deliveries drivers maintain the transport documents which contain information on the dangerous goods carried and TREM cards which are to be used in the event of an accident involving the dangerous goods.
- 14.12 Stericycle employs appointed safety advisers with a valid vocational training certificate who is capable of performing the duties of a safety adviser in accordance with the requirements of the ADR and the European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 to 2017.

Vehicles

- 14.13 Due the nature of its business, Stericycle requires vehicles for carrying out its operations. All vehicles are fully maintained and have a D.O.E certificate. Due to the nature of the business all vehicles are fitted with the necessary first aid and safety equipment in accordance with ADR Regulations.

Drivers

- 14.14 All Stericycle drivers are fully licensed to drive vehicles. All drivers are in possession of an ADR licence.

14.15 Drivers are required to report any defects immediately to their Line Manager.

Safety Checks

- 14.16 Drivers are responsible for carrying out daily checks on transport unit.
- 14.17 Stericycle carries out ADR Compliance audits on the transport units throughout the year to ensure that it meets the ADR requirements.

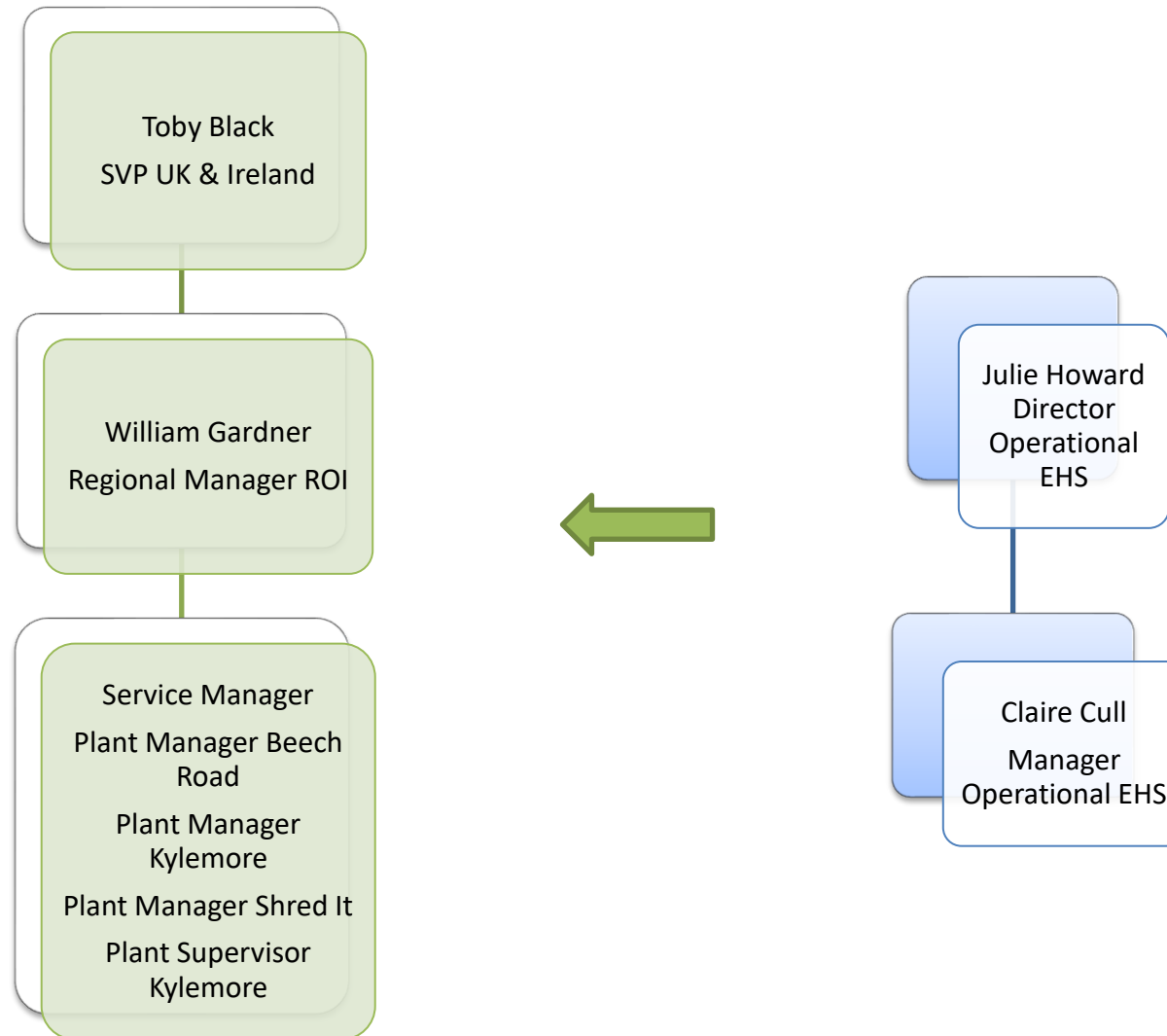
Maintenance

- 14.18 The transport units are serviced regularly. Drivers are responsible for reporting defects immediately upon detection to the Service / Logistics Manager.

Driver Safety Rules

- Drivers must be in receipt of the appropriate licence for the vehicle at all times;
- Drivers must drive in accordance with the rules of the road at all times;
- Drivers must not put themselves or any other person in danger as a result of their driving activities;
- Drivers are not permitted to operate Company vehicles when excessively tired;
- Drivers must inform their Manager if they are taking any prescription drugs which may impair their driving ability;
- The use of alcohol or illegal drugs is strictly prohibited when operating a vehicle;
- Drivers must don his/her seatbelt when operating the vehicle;
- Only authorised drivers are permitted to operate Stericycle vehicles.

15. Ireland -Process / Sales Organisational Structure



16. Hazard Identification and Risk Assessment Procedure

Definitions

- 16.1 A Hazard is defined as a source of potential harm or damage or situation with potential for harm or damage.
- 16.2 A Risk is the combination of the likelihood and the severity of harm of a specified hazardous event.

Likelihood of Harm

- Highly Unlikely – very few people involved; short duration of exposure to the hazard; Protection afforded by PPE.
- Unlikely.
- Likely – large number of people involved; little protection from any PPE; unsafe acts by persons (e.g. no skills to carry out specific work; underestimate risks and no knowledge of what the hazards are).

Severity of Harm

- Slightly Harmful – minor cuts/bruises & temporary discomfort.
- Harmful – concussion, minor fractures, deafness or asthma.
- Extremely Harmful – amputations, fatalities or occupational disease.

Risk Assessment Tables

Severity Rating (S)		Probability Rating (P)	
Major Injury / Death	4	Very Likely	4
Serious	3	Likely	3
Minor	2	Unlikely	2
Insignificant	1	Very Unlikely	1

Numerical Value (S x P)	Descriptive Risk Rating	Action
16	Intolerable	Steps must be taken to reduce risk before task is undertaken
12	Substantial	
8 - 9	High	Reduce to ALARP
4 - 6	Moderate	Reduce to ALARP
2 - 3	Low	No further action
1	Insignificant	No further action

		Potential Severity			
		Insignificant 1	Minor 2	Serious 3	Major 4
Probability (likelihood) of harm occurring	Very Likely 4	Moderate 4	High 8	Substantial 12	Intolerable 16
	Likely 3	Low 3	Moderate 6	High 9	Substantial 12
	Unlikely 2	Low 2	Moderate 4	Moderate 6	High 8
	Very Unlikely 1	Insignificant 1	Low 2	Low 3	Moderate 4

Table 2: A Risk-based Control Plan

Risk Level	Action & Timescale
Trivial	No action is required and no documentary records need to be kept.
Tolerable	No additional controls are required. Consideration may be given to a more cost effective solution or improvement that imposes no additional cost burden. Monitoring is required to ensure that the controls are maintained.
Moderate	Efforts should be made to reduce the risk, but the costs of prevention should be carefully measured and limited. Risk reduction measures should be implemented within a defined period.
Substantial	Strenuous efforts must be made to reduce the risk.
Intolerable	Work should be discontinued pending a decision on risk reduction.

OPERATIONS RISK ASSESSMENT INDEX

Loading and unloading	Legionella
Receipt and Inspection	SQ Vehicle Operations On site/ Off site
Storage and Segregation	LQ Vehicle Operations On site/ Off site
Fork Lift Truck	AT Operations
Office and Canteen	Bio Systems Plant Operations
Fire	Transfer Station Hazard Operations
Maintenance Operations	Sharps Management Systems
First Aid	Noise
Enclosed Space	Dublin Site Services
Continuation of Stericycle operations during Covid pandemic	

17. Individual Receipt of Safety Statement

I _____ understand the information enclosed within this health and safety statement and will comply to the best of my ability with the policies outlined.

Signed:

Date:

