



Health and Safety Policy

Company Policy
APOL-044

Version 1

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1 Document Control

This section defines who prepared, checked and approved this document version.

Date	V.	Prepared	Checked	Approved	Comments
06/10/2025	1	Enea Di Mauro	James Boucher	Jun Zhang	Expansion and extraction from the combined HSSE policy 2025-2026

Table 1. Document control

2 Distribution

This company policy applies to Atmos Headquarters in UK.

3 Validity

This policy is applicable from the date of issue and takes the place of any previous policy on this subject. It will be valid until a new version is published. Please also note that any specific British laws will take precedence over this guideline if the two differ.

4 Reference

This section lists any other documents or regulations that are connected with this policy:

HLCR	HSE Legal Compliance Register
HSEC	HSE Committee
HSEM	HSE Manual
HSEO	HSE Organogram
IPP.35	HSE Procedure
IPPL	Incident Prevention Plan

5 Definitions

This section lists any specific terminology used within this policy:

OHSAS	Occupational Health and Safety Assessment System
HSR	Health Safety Representative (appointed or elected by a trade union)

6 Compliance

The following legislation and regulations inspired the production of this document:

ATEX	Equipment and Protective Systems Intended for Use in Potentially Explosive Atmospheres Regulations 2016 (refereed to as EPS)
CAR	Control of Asbestos Regulations 2012
COMAH	Control of Major Accident Hazard Regulation 2015.
DSEAR	Dangerous Substances and Explosive Atmosphere Regulations 2002
DWPA	Duty Worker Protection Act 2023 (Amendment of Equality Act 2010).
EAWR	The Electricity and Work Regulations 1989
EPA	Environmental Protection Act 1990 (sec 34)
HSWA	Health and Safety at Work Act 1974
MHSWR	Management of Health and Safety At Work Regulations 1999
OIR	Offshore Installations Regulations 2015 (offshore installations).
PFEER	Prevention of Fire and Explosion and Emergency Response 1995 (offshore installations).
PUWER	Provision and Use of Work Equipment Regulations 1998
ISO 45001:2018	Occupational Health and Safety Management System

7 Purpose

The purpose of our Health and Safety Policy is to ensure a safe and healthy working environment for all employees, contractors, visitors, and others affected by the organization's activities. Here's a breakdown of its key objectives.

7.1 Legal Compliance

Ensures the organization complies with relevant health and safety laws and regulations.
Helps avoid legal penalties and liabilities.

7.2 Risk Management

Identifies potential hazards and outlines procedures to minimize or eliminate risks.
Promotes proactive rather than reactive safety management.

7.3 Employee Protection

Safeguards the physical and mental well-being of employees.
Reduces workplace accidents, injuries, and illnesses.

7.4 Clear Responsibilities

Defines roles and responsibilities for health and safety across all levels of the organization.
Encourages accountability and involvement from management and staff.

7.5 Continuous Improvement

Establishes a framework for monitoring, reviewing, and improving health and safety performance.
Encourages reporting of incidents and near misses to learn and prevent recurrence.

7.6 Positive Safety Culture

Promotes awareness and training to foster a culture where safety is a shared value.
Enhances morale and productivity by showing commitment to employee welfare.

8 Scope

The scope of this policy affects only the UK Headquarters.

9 Introduction

Atmos International Limited is a software house and hardware design SME company. We work in an office environment with very low risks. We occasionally use some chemicals such as PCB cleaning agents and coating sprays but do not operate machinery, plants, cranes, HGVs or production lines. Occasionally we devise prototypes for our hardware, but mostly they get tested at the customer premises. The only time when some staff (project engineers mainly) are potentially at risk is when they visit our customers' premises which are: refineries, pipeline installations, oil platforms, etc. In those cases, our staff follow exactly the local laws and regulations in the country and plant visited. Please note that our staff do not perform site installations. Those are always carried out by locally qualified specialists, vetted by the customer, with local work permit.

10 The policy

10.1 Applicable health and safety regulation or legislation

The compliance section 6 lists all the possible UK regulations. The table below shows the applicability (or otherwise) for each of them with a justification in each case.

Law or regulation	Long description	Applicability	Justification
ATEX	Equipment and Protective Systems Intended for Use in Potentially Explosive Atmospheres Regulations 2016	Yes	Applicable in projects where we deal with ATEX products
CAR	Control of Asbestos Regulations 2012	Yes	Applicable to all industries
COMAH	Control of Major Accident Hazard Regulation 2015.	Yes	Applicable only when our staff visit offshore installations
DSEAR	Dangerous Substances and Explosive Atmosphere Regulations 2002	Yes	Applicable
DWPA	Duty Worker Protection Act 2023 (Amendment of Equality Act 2010).	Yes	Applicable to all industries
EAWR	The Electricity and Work Regulations 1989	Yes	Applicable to all industries
EPA	Environmental Protection Act 1990 (sec 34)	Yes	Applicable to all industries
HSWA	Health and Safety at Work Act 1974	Yes	Applicable to all industries
MHSWR	Management of Health and Safety At Work Regulations 1999	Yes	Applicable to all industries
OIR	Offshore Installations Regulations 2015 (offshore installations).	Yes	Applicable only when our staff visit offshore installations
PFEER	Prevention of Fire and Explosion and Emergency Response 1995 (offshore installations).	Yes	Applicable only when our staff visit offshore installations
PUWER	Provision and Use of Work Equipment Regulations 1998	Yes	Applicable to all industries

Table 2. Applicable H&S regulation or legislation

The regulations and laws applicable to our business are then addressed in the following sections.

10.2 Policy Statement

Below is a brief declaration of the company's commitment to maintaining a safe and healthy work environment.

"Atmos International Ltd. is committed to ensuring the health, safety, and welfare of its employees, contractors, and visitors. We aim to comply with all relevant health and safety legislation and promote a culture of safety and well-being."

10.3 Responsibilities

The ultimate responsibility for Health and Safety rests with the Chief Executive Officer. She delegates the day-to-day duties for HSE to the HSE Manager. Duties include risk assessments, training, emergency planning, and employee consultation. Please note that the HSE Manager is not a union appointed or elected safety representative (HSR), therefore he does not have the same legal authority.

For site visits, the HSE responsibility rests with the Project Manager.

For lone workers, the responsibility rests with their Line Manager.

10.3.1 Management Responsibilities

- Ensure compliance with health and safety laws.
- Provide necessary resources and training.
- Conduct regular risk assessments.

10.3.2 Employee Responsibilities

- Follow safety procedures and report hazards.
- Use equipment safely and responsibly.

- Participate in training and awareness sessions.

10.4 Risk Assessment

- Identify potential hazards (e.g., ergonomic risks, fire safety, electrical equipment).
- Evaluate and control risks.
- Review assessments annually or when changes occur.

10.5 Workplace Safety Measures

- Ergonomic workstation setup.
- Fire safety procedures and equipment.
- Electrical safety and equipment maintenance.
- Cleanliness and hygiene standards.

10.6 Emergency Procedures

- Fire evacuation plan.
- First aid arrangements.
- Contact details for emergency services and internal safety officers.

10.7 Health and Wellbeing

- Encourage breaks and movement during long work hours.
- Mental health support resources.
- Flexible working arrangements where possible.

10.8 Training and Communication

- Induction training for new employees.
- Regular updates and refresher sessions.
- Clear communication channels for reporting issues.

10.9 Monitoring and Review

- Annual review of the policy.
- Feedback from staff.
- Updates based on changes in legislation or company operations.

10.10 Health and Safety Management System

Atmos has a limited management system for health and safety, principally because of the small number of personnel and also the hazards present in everyday work tasks.

The HSE Manager carries out risk assessments of the work-place, for instance to determine the type of extinguishers to assign to each section of the company. He also deals with day-to-day Health and Safety issues that may arise and advises the company on current Health and Safety regulations.

He looks after the training for employees designated for first aid and fire protection. He keeps all the HSE documentation up to date and keeps informed of the relevant regulation and legislation.

He listens to reports and seek information about any hazard, current and future, and act as soon as possible to minimise the consequences.

He commits to continual improvement in Health, Safety.

With regards to communicable diseases, such as COVID, he performs risk assessments, deploys hand sanitizers, warning posters, hybrid working, social distancing, information bulletins.

He helps minimize and prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities.

He devises and implements emergency procedures – for instance an evacuation in case of fire or other significant incidents.

He also works with the relevant head of other departments to maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage / use of substances.

10.11 ATEX and DSEAR

A number of the products that Atmos works with are certified to Explosive Atmosphere standards. The HSE manager with the relevant Product Expert work together to make sure the regulation is followed and that the appropriate precautions are taken, both in the company as well as on site.

10.12 Control of Asbestos Regulation

The HSE Manager is responsible for making sure there is no asbestos in the company premises. When there is then the proper safe procedure is implemented which involves the safe removal of asbestos by a specialist company and a follow up test to confirm the restoration of safety.

In case the asbestos cannot be removed, the HSE Manager will commission yearly tests, from a specialist, to check the health of the fixtures containing asbestos to guarantee that they are indeed safe.

10.13 COMAS, OIR, PFEER regulations

These are only applicable in those few instances when some personnel (project or field engineer) visit customer sites: pipeline installations, oil platforms, refineries, etc. These regulations are normally implemented by the owners/users of the premises and Atmos personnel will always receive specialist training and follow the local HSE induction or be chaperoned by suitable qualified local personnel.

10.14 Duty Worker Protection Act

This refers to the Worker Protection (Amendment of Equality Act 2010) Act 2023, which came into force on 26 October 2024. It introduces a positive legal duty for employers to take reasonable steps to prevent sexual harassment in the workplace and work-related settings. Atmos does not tolerate any harassment of any sort and has a number of policies to reinforce their commitment.

10.15 The Electricity and Work Regulations

Atmos aims to ensure that electrical systems and equipment are constructed, maintained, and operated safely to avoid risks such as electric shock, burns, fires, and explosions.

We operate three approaches:

1. Annual PAT testing, to check all portable electrical appliances – The IT Manager is responsible for this.
2. Quinquennial fixed circuits testing, to check the electrical circuits – The Infrastructure Manager is responsible for this.
3. RAMS (Risk Assessment and Method Statement) for any site installation – The Project Managers are responsible for this for their projects.

10.16 EPA section 34

Section 34 establishes the “**Duty of Care**” for anyone who handles **controlled waste** (household, industrial, or commercial). It applies to:

- Producers and importers of waste.
- Carriers, brokers, and dealers.
- Anyone who keeps, treats, or disposes of waste

While this is covered by the Environmental Policy, unsafe waste disposal also has HSE repercussions.

10.17 Health and Safety at Work (HSWA and MHSWR)

HSWA:

- Primary legislation forming the foundation of UK health and safety law.
- Sets out **general duties** for employers, employees, and others to ensure health, safety, and welfare at work.
- Principles-based, not prescriptive.

MHSWR:

- Secondary legislation made under HSWA.
- Provides **specific requirements** for managing health and safety, focusing on **risk assessment and preventive measures**.

PUWER:

It is a UK regulation under the **Health and Safety at Work Act 1974**. It aims to ensure that **work equipment is safe, suitable, and properly maintained**, reducing risks of accidents and injuries in workplaces.

Apart from the standard risks and hazards of an office environment, Atmos staff has occasional exposure to hazardous environments at the customer sites. We work closely with our customers to minimize risks and comply with their local regulations.

The health and safety law poster is displayed in the kitchen.



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