



## Contractors Handbook

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## **1.0 Introduction**

1.1 Chivas Brothers believe that the health, safety and welfare of both Company and Contractors' employees and the protection of the environment are of paramount importance. It is recognised that the standards adopted by Contractors have a significant impact on the overall safety and environmental performance of our business. For this reason, access to our property is restricted to Contractors who share our views and are able to maintain high standards in these areas.

1.2 The objective of this Handbook is to provide:-

1.2.1 Contractors' organisations with awareness of the health, safety & environmental standards required by Chivas Brothers.

1.2.2 These standards must always be considered when tendering or conducting work on our premises.

1.2.3 Contractors' employees with a source of advice and reference information while working within our premises.

1.3 Failure to comply with the specified standards will result in individuals or groups of Contractor's employees being requested to leave our premises. If the non-compliance is serious enough, the Contractor's organisation will be removed from the Approved Contractors Listing and consequently will not be eligible for future work. This handbook must be read carefully. If you have questions relating to the contents, please discuss the matter with your site contact.

1.4 "Company" means Chivas Brothers Limited and Chivas Brothers International Limited (Chivas Brothers) and associated subsidiary companies and includes their personal representatives, successors and permitted assignees. When reference is made within this document to Chivas Brothers' sites, the company's premises or any phrase similar, it is intended to refer to any site where work is being conducted for Chivas Brothers.

1.5 "Contractor" means any contractor or sub-contractor carrying out works on any Company property. Contractors must always adhere to regulations, rules etc. provided by any other person or company who may be controlling that site. Contractors must endeavour to find out any such rules etc. before commencing work.

1.6 The rules contained within this document are not exhaustive but are intended to protect the Health and Safety of all persons who may be affected by the contractor's activities, not just

Chivas Brothers' employees. These rules are also intended to protect the quality and integrity of the Company's products and general site security. You are required to comply with these regulations and are instructed to bring the content of this document to the attention of your employees.

### 1.7 Apprentices (all ages) and Young Persons (16 to 18 years of age)

Chivas Brothers have a recruitment and training programme for engineering apprentices, and wholly support this where facilitated by its Contractors.

Within areas where significant risks have been identified, activities should be restricted to persons over 18.

In order we can collectively meet our obligations it is imperative that Apprentices and any Young Persons are identified to the site-contact prior to their arrival at site in order that specific risk assessment, appropriate controls, and their attendance at site is agreed in advance.

All work activities carried out by an Apprentices and Young Persons must be clearly instructed and closely supervised by an identified and suitably competent Responsible Person nominated by the Contractor.

On arrival at site, and prior to any works commencing, these individuals require to be introduced to the site-contact and must receive ACE-induction – to include a comprehensive discussion ensuring clarity on permitted tasks, how to comply with site-controls, and personal responsibilities whilst operating at site, with their Responsible Person and the Chivas Brothers site-contact.

## 2.0 Approved Contractors

2.1 Only Approved Contractors are authorised to work within premises operated by Chivas Brothers. All Contractors' organisations must supply information to demonstrate an awareness of health, safety and environmental issues to a level required commensurate with the risks associated with the work to be undertaken. Contractors who meet this requirement may be eligible to be included on our list of "Approved Contractors". Approved Contractor status allows your company to tender for work at any site operated by Chivas Brothers.

2.2 The listing will be reviewed at three yearly intervals and will require an update of Contractors health, safety & environmental information to be held on file. The update process works on a calendar basis, consequently your initial approval period may be less than a full 3 years.

## 3.0 Health & Safety at Work Company Policy Statement

3.1 Health & Safety legislation requires all companies employing five or more people to produce a Safety Policy and bring it to the attention of Staff, stating the Company's safety rules and arrangements for managing Health & Safety. The Company will examine Contractors Safety Policies and will supply, on request, a copy of our own. Duties under 'The Health &

Safety at Work etc. Act' and Common Law require that all contractors must take reasonable care to ensure that their employees and others are safe in and about their work. To fulfil these obligations the Contractor must ensure:-

- 3.1.1 Safe means of access to and egress from work places.
- 3.1.2 Safe sites of work and systems of work - Contractors CSCS, CPCS, CISRS, CCNSG, Safe Pass, or some other form of accredited training will be expected
- 3.1.3 Competent employees and craftsmen.
- 3.1.4 Adequate training and supervision - Trained Supervision: SMSTS, SSSTS, NEBOSH, IOSH Managing Safely or some other form of accredited training will be expected.
- 3.1.5 Safe plant, equipment and appliances in good working order - service/inspection records require to be maintained and be available for review at site.

#### **4.0 Commencing work**

4.1 Permission must be obtained from the Company before Contractors start work on the site and before they arrange for deliveries prior to their work commencing. Contractors' management and supervisor will normally be required to attend a pre-start site meeting.

The Contractor shall be asked to nominate an 'Approved Contractors Employee' (ACE). This person is normally, but not always, the foreman or supervisor who will be present on site whilst work is in progress.

4.2 The ACE receives induction training on relevant Chivas Brothers rules and procedures, and must ensure that controls specified in the Safe Systems of Work to include; method statement, risk assessment, pre-start documentation, Work Authority and if applicable, Permit to Work, are strictly observed.

4.3 The Company operate a Work Authority system for all work carried out by Contractors. Before starting work, the Contractor's site supervisor must have possession of a Work Authority which will specify isolation, fire prevention and other precautions necessary. A Work Authority will only be issued when the guidance set out in this document is to be implemented. The Work Authority must be returned to the issuing office at the end of each day, or when the work has been completed if earlier. For high risk work, a Permit to Work will be issued which supplements the Work Authority document.

4.4 All Risk Assessments/Method Statements under the Management of Health and Safety at Work Regulations, The Manual Handling Operation Regulations, The COSHH Regulations and any other Relevant Statutory Provision must be available on site, for inspection at all times.

4.5 The Contractor must provide job specific Method Statements for all operations. The Method Statements must be approved by the Company's Authorised Representative before any work commences. The Method Statements must contain details of the hazards, the sequence of the works and special precautions needed. The Contractor must be satisfied that the hazards associated with working in a production unit have been fully assessed in the Method Statement. This will require information on the hazards present in the work area. The Company's Site Management will provide information and assist in identifying hazards arising from the production process. The Company may provide guidance on the information required in a Method Statement. Contractors can use their own form but it must contain the minimum information required by the Company. Method Statements are to be provided in a timely manner, and in normal circumstances not less than 3 working days before the relative work is due to start.

All statutory notices applicable to the work should be displayed for operatives to read before starting the job.

4.6 When the hazards of dangerous fumes, dusts or fibres are present, then suitable assessments must be carried out under the Control of Substances Hazardous to Health Regulations (COSHH).

4.7 Approved Contractors are required to demonstrate insurance cover to a specified minimum standard. In certain circumstances, where the potential for an exceptional loss exists, the Company Method Statement will specify that the Contractors arrange a premium level of insurance to reflect the higher risk.

4.8 All contractors are required to fulfil their legal obligation under The Control of Asbestos Regulations to ensure where their staff will be at risk of becoming exposed to asbestos subject to their work activities; they will be suitably trained.

## **5.0 Approved Contractors Employees (ACE's)**

5.1 To ensure compliance with the control measures described within the Company Method Statement and our general safety & environmental requirements, all Contractor organisations are required to nominate one or more Approved Contractors Employees (ACE's). ACE's must attend a Chivas Brothers induction to familiarise them with our sites/procedures/emergency arrangements and other relevant information. A record of this training will be maintained.

5.2 Common safety and environmental procedures exist within Chivas Brothers. Due to the diverse range of activities, it is necessary to restrict the recognition of ACE status to individual sites or groups of sites. Your Company representative will be able to advise you on this matter.

5.3 In some instances, due to the nature of the risks, Chivas Brothers may specify that all employees of a particular "Approved Contractor", who work on our sites, must attain ACE status. These requirements will be indicated on the Company Method Statement.

## **6.0 Pre-Start Meeting**

6.1 Immediately prior to work commencing, a Pre-Start Meeting must be completed. The meeting will be conducted by a Company representative and requires the attendance of a Contractor's employee who has attained ACE status. All authority to work is immediately withdrawn if the presence of at least one ACE, who has attended the Pre-Start Meeting, cannot be maintained on site. To avoid this situation, it may be beneficial to have a number of staff trained to ACE status and attending the Pre-Start Meeting.

Contractors are responsible for the conduct of their Sub-Contractors. For this reason, the requirement to maintain the presence of an ACE is extended to situations where a Contractor may only have Sub-Contractors on site. It is acceptable to arrange for a Sub-Contractor's employee to be trained to ACE status provided there is a written request by the main contractor to do so.

6.2 The objective of the Pre-Start Meeting is to ensure the ACE(s) is/ are aware of:-

6.2.1 the details of the work to be undertaken;

6.2.2 the health, safety & environmental controls specified previously or forming part of the Pre-Start Meeting / Work Authority Form;

6.3.3 the ongoing communication arrangements regarding reporting to your Company representative, on completion of the work, and the need to collect Safety File documentation.

6.3 It is essential that the ACE(s) who attend(s) the Pre-Start Meeting has/ have the authority to ensure compliance with all agreed health, safety & environmental standards.

The ACE(s) will be required to sign a Pre-Start Meeting / Work Authority Form to confirm the issues listed above have been discussed and agreed.

## **7.0 General Conditions**

7.1 All construction work must be carried out in such a manner that it satisfies the requirement of 'The Construction (Design and Management) Regulations.



7.2 The duties imposed on all employers by the Management of Health & Safety at Work Regulations must be fulfilled including, where appropriate the co-operation and co-ordination between themselves, other contractors on site and the Client.

7.3 Contractors' personnel must report their arrival and departure each day as instructed by the Company. This requirement will ensure that in the event of a site evacuation all personnel can be accounted for.

7.4 All Contractors must nominate a named site supervisor and if required a safety officer. No substitutions will be allowed, unless by previous agreement and with reasonable notice. The nominated site supervisor is required to be on site at all times during the execution of the works.

7.5 The Contractor is required to fence his site establishment and the work area and shall provide suitable warning and safety signs at the perimeters thereof to advise all personnel of restrictions and possible dangers. Where agreed by the Company's Authorised Representative alternative arrangement for demarcation of the site establishment and/or the work area will be accepted.

7.6 The Contractor is required to provide and maintain suitable signs on all escape routes affected by the works to direct personnel to alternative exits.

7.7 The Contractor shall take all proper measures to the satisfaction of the Company to minimise the spread of dust, fumes, noise, liquids, pollutants, etc. and to prevent any nuisance arising from the carrying out of the works.

7.8 No petrol or diesel powered plant or equipment shall be permitted within buildings or confined spaces without approved exhaust extraction arrangements or approval of a method statement for work to be undertaken. Such approval for petrol driven plant is unlikely to be granted where alternatives are available.

7.9 The Contractor must take all reasonable steps to limit noise generated by execution of the Works; operations likely to bring about disturbance/nuisance may require to be carried out out with normal working hours, but such consideration will include an assessment of 'Neighbourhood Annoyance'

7.10 Contractors must establish contingency plans to handle emergencies which may arise in their areas of responsibility.

7.11 In the context of consideration for general health (apart from any special regulations in existence in relation to promotion of safety and avoidance of fire), the Company strictly limits the number of areas within their premises within which personnel are allowed to smoke; smoking will only be permitted in designated areas.

7.12 No work is to be carried out at high level where people are working or could access areas below, unless adequate precautions are taken.

7.13 Each individual Contractor is responsible for ensuring that all tools and equipment, in their control, are inspected and tested for safety before being put to use. The Company may inspect the Contractor's work equipment during permit compliance checks, and if deficiencies are found the Contractor may be asked to stop work and leave site until rectified.

7.14 Proper means of access, gangways etc, must be maintained to a suitable width and free from obstruction.

7.15 Each Contractor is responsible for ensuring that ALL electrical supply leads in their control are kept in safe positions. Any supply leads that are to be in position for a period of time should be secured.

7.16 The Contractor is advised that no consumption of food or drinks is permitted by operatives within any building except in designated messing area and that radios are forbidden within the site.

7.17 The possession or consumption of alcohol is forbidden on the Company's premises. Each Contractor shall ensure that no workmen under his control, is at work on Chivas Brothers' premises whilst under the influence of alcohol or drugs (except drugs prescribed by a General Practitioner and assessed as acceptable for work).

7.18 Each Contractor must ensure that workmen under his control operate in a clean and tidy manner at all times and in particular, avoid any accumulations of materials which could pose a fire hazard. All waste materials must be removed and disposed of at the end of each shift.

7.19 All persons engaged on construction and associated works are required to wear head protection and where work is at height, a chin strap to secure the safety headwear. In certain areas and sites the wearing of head protection is mandatory.

7.20 Adequate protective clothing must be provided by the Contractor against inclement weather, extremes of temperature, sparks, hot substances and poisonous or corrosive materials.

7.21 Operations such as chipping, grinding, sanding, welding and similar activities must not be undertaken without the provision of adequate eye protection (Contractors should refer to the general duties of the Health & Safety at Work Act and the Personal Protective Equipment at Work Regulations). All persons working in areas identified by appropriate signage must wear eye protection while in these areas. Adequate foot protection must also be provided. The feet should be safe from hazards posed by cold, wet or muddy conditions and sharp or falling object. The foot protection must be capable of withstanding penetration through the sole or uppers where such risks arise. All persons working in operational areas or engaged in construction or engineering works are required to wear safety footwear.

7.22 Where work involves contact with any Toxic, Harmful, Corrosive or Irritant substance, or there is a risk of cuts or abrasions, gloves suitable for the task should also be provided.

7.23 With reference to the Control of Noise at Work Regulations, hearing protection to the appropriate E.N. standards may also need to be provided. All persons working in areas identified by appropriate signage must wear ear protection while in these areas.

7.24 High visibility clothing to a standard of EN471 class II minimum is required where traffic is operating, including inside all warehouses and where local site rules require.

## **8.0 Corporate Social Responsibility**

8.1 The Purchaser is committed to conducting its business in a socially responsible and ethical manner which supports and promotes the *United Nations Global Compact* within the Purchaser's sphere of influence. This includes the Purchaser's suppliers. Accordingly, the Contractor agrees to carry out the Works and its obligations under the Contract in accordance with applicable ethics and principles of sustainable development. The Contractor shall provide its services to the Purchaser in compliance with employment rights, human rights and fundamental freedoms, and undertakes to abide by the provisions of international labour conventions, particularly the eight fundamental International Labour Organisation (ILO)

Conventions. In particular, the Contractor agrees that it will not employ under age children. The Contractor shall provide such reasonable evidence as the Purchaser may request from time to time that they are acting in accordance with the aforementioned labour standards.

## **9.0 Construction (Design and Management) Regulations**

9.1 Contractors should note that these regulations can apply to mechanical, electrical and plant site work not otherwise considered being "construction" work.

The Company will appoint in writing a Designer, a CDM coordinator and a Principal Contractor where these regulations apply. All of these appointees have duties within these regulations as do all other contractors. Your attention is drawn to HSE guidance PML 54

9.2 The Contractor is required to comply fully with the requirements of the Construction (Design & Management) Regulations and the Health and Safety File for the works including the prompt provision of any information required for development of or inclusion in the plan. Where the Contractor is the "Principal Contractor" in terms of the Regulations he must develop the Health and Safety Plan for the construction phase of the works.

## **10.0 Non-Compliance**

10.1 At the company's sole discretion, work thought to be dangerous or not complying, in all respects with the submitted Company Method Statement or the Chivas Brothers general health, safety & environmental requirements may be halted. Chivas Brothers will not accept any liability for lost earnings or costs incurred by the enforced cessation of any contracted works as a result of breaches of health, safety or environmental performance standards.

## **11.0 General Safety & Site Rules**

11.1 Information is issued on entry to our sites by way of a Site Guide. This explains the emergency arrangements and site rules applicable to both Visitors and Contractors.

Site rules include:

11.1.1 The requirement to notify your Chivas Brothers representative, on a daily basis, before you start work or enter the work area;

11.1.2 The site specific emergency arrangements: - e.g. fire/first aid;

11.1.3 The need to observe and comply with site safety signage and warnings;

11.1.4 Restrictions placed on smoking within the site;

11.1.5. Prohibition of photography without permission from your Company representative;

11.1.6. Designated parking areas, or parking as directed by local site management;

11.1.7 Company equipment may not be used without explicit permission from your Chivas Brothers contact. Permission will only be granted in exceptional circumstances or in circumstances where our refusal would create a significant safety hazard; this includes the use of Chivas Brothers' workshops and any equipment within the workshops.

11.1.8 Chivas Brothers reserves the right to search vehicles and individuals;

11.1.9 Company passes, normally issued at reception or the Security gatehouse must be displayed at all times. The pass details the contractor's address, 24-hour contact number and employee details. At certain locations where this system is not in operation, all Contractors' staff must carry a means of identification;

11.1.10 Work to be carried out by Young Persons (i.e. those under 18 years of age) must be assessed in line with the additional requirements of The Management of Health and Safety at Work Regulations.

11.1.11 In line with good safety practice, hair must be tied back and jewellery removed within processing areas or when working with machinery;

11.1.12 Radios and personal stereos are not permitted;

11.1.13 Dogs and other animals are not permitted;

11.1.14 Bringing highly flammable liquids/liquefied petroleum gas on-site requires the permission of your Chivas Brothers contact. This category of product must be stored in a safe manner and location during work. It must be removed daily, unless otherwise agreed;

11.1.15 Chemicals and other substances must be suitably stored to prevent accidental spillage;

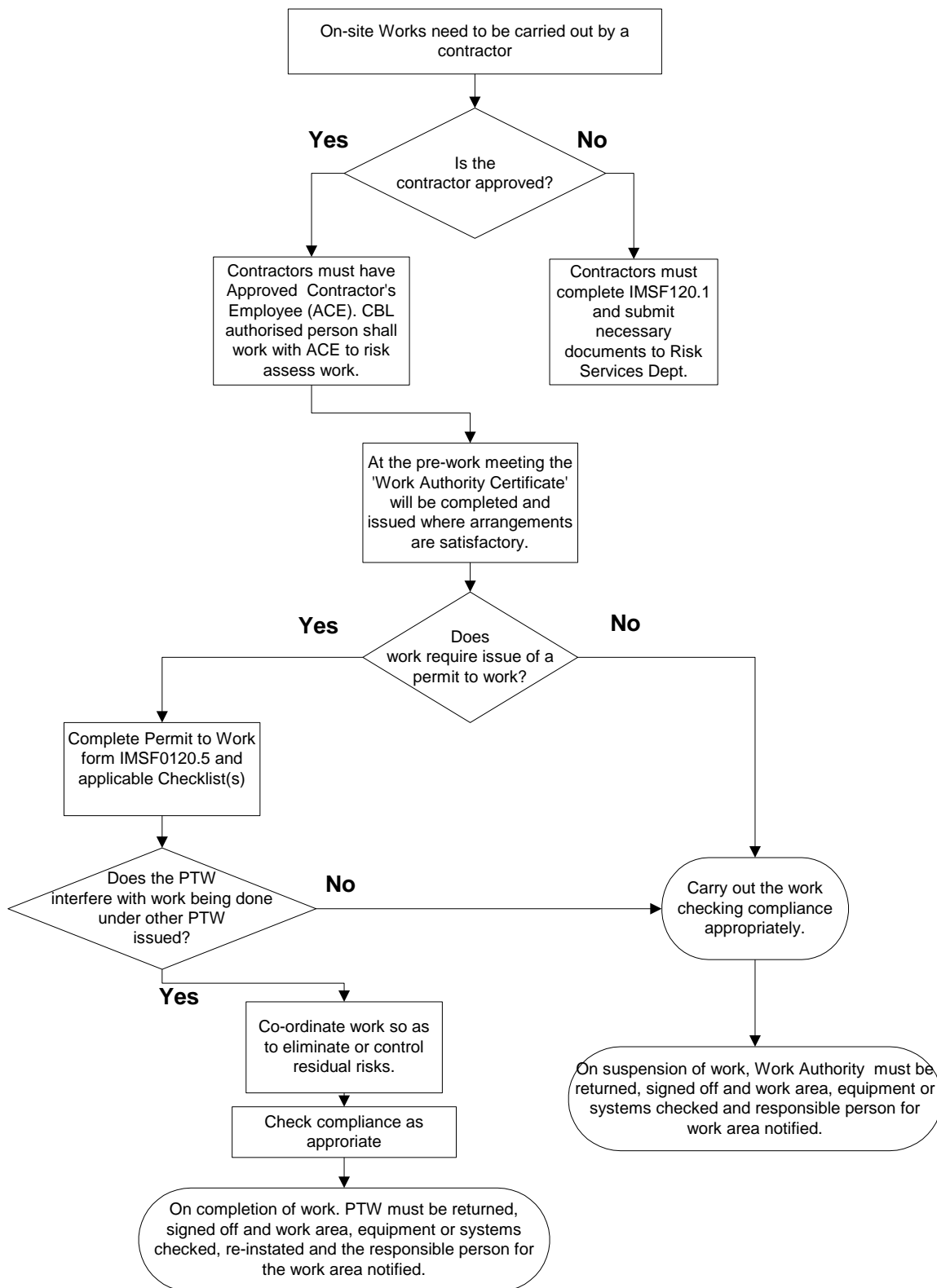
11.1.16 Pressurised cylinders (e.g. propane, butane, etc.) must be adequately secured to prevent accidental falls.

11.2 Contractors' vehicles must be roadworthy and drivers in possession of the appropriate licence. Holders of provisional licenses are expressly prohibited from driving any vehicles on site.

## **12.0 The Control of On Site Works**

12.1 The Chivas Brothers 'Control of On Site Works Procedure shall be used for all work unless it has been agreed in advance that the construction area shall be transferred to the Contractor as a CDM site and an alternative means of work control employed.

12.2 The general requirements of Chivas Brothers' Control of on Site Works Procedure are set out below:



### **13.0 Accident & Dangerous Occurrences (RIDDOR)**

13.1 The Contractor must be aware of and comply with the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). In addition to the requirement to advise the Health & Safety Executive, all accidents, diseases, dangerous occurrences and near misses must be reported to the Company's Site Manager and where applicable the Principal Contractor as soon as practicable. Wherever injury has been caused, it must be recorded in the Accident Book.

13.2 Chivas Brothers notification liability in respect of persons other than Chivas Brothers' employees is confined to self-employed persons, members of the public, and persons undergoing training with Chivas Brothers. All near misses as well as accidents and dangerous occurrences must be reported to the Company's Site Management to assist in developing a safer working environment.

13.3 Use of any emergency equipment- such as fire extinguishers or eye wash bottles- or any incident where protective equipment (e.g. hard hat, fall arrest systems) has been needed to prevent an accident must be reported to the Company's Site Management

### **14.0 Confined Spaces**

14.1 Any contractor required to enter confined spaces must under all circumstances comply with the letter and spirit of Confined Spaces Regulations. Access to Confined Spaces will only be by authorisation by the Company on issue of a 'Permit to Work' (PtW) which will not be granted without the prior completion of a suitable and sufficient risk assessment. It will be completed by the Company in consultation with the Contractor. Equipment identified as necessary by the risk assessment must be provided by the Contractor who will be required to verify that it meets current standards, is properly maintained and that their employees have been trained in its use. Prior to a PtW being issued current certification demonstrating medical fitness for entry into a confined-space requires to be facilitated. An appropriate Rescue Plan requires to be provided, and discussed & agreed prior to works commencing.

### **15.0 Excavations**

15.1 All excavations require a written 'Permit to Work' issued for each individual job with an 'excavation checklist' completed and issued for a maximum of 12 hours only. No excavation work is to be carried out under any circumstances without a valid permit.

Prior to any excavation work the Contractor must obtain copies of the Company's records of underground services in the vicinity. Information on the location of public services may be

required from the owner of the services e.g. gas, electricity, water or communications company.

15.2 Prior to excavating, the area must be scanned to confirm and/or identify the location of underground services. Such locating work should only be undertaken by suitably trained operatives who are familiar with the limitations of the locating devices.

15.3 Where electrical cables are known to exist or are uncovered the contractor must contact their Chivas Representative who will in turn contact the Company's Electrical Engineer.

15.4 Where underground services are known to exist, no machinery will be used until the location of the services has been identified by hand digging. Where drainage services only exist, machine excavation may be permitted if specifically authorised by the Company's Authorised Representative.

15.5 It will be necessary for the contractor to follow the guidance laid down in HSE guidance concerning *Underground Services*. Should there be any doubt as to the identity of a buried service, it should be treated as an electric cable or gas pipe until proven otherwise. If a buried service is damaged, it must be reported to the service owner and the area cordoned off until repair is made.

15.6 Any exposed service must be backfilled carefully in accordance with any advice given by the service owner.

15.7 Contractors must ensure that excavations are adequately shuttered and braced against collapse. Stockpiles of excavated and fill material must be positioned to avoid any danger of increasing the load on trench sides or slips into the excavation - An appropriate Rescue Plan requires to be provided, and discussed & agreed prior to works commencing.

15.8 The Contractor performing excavation works shall provide temporary hoardings, fencing, planked footways, guard rails, gantries and the like as may be necessary for protecting the company employees, employees of the contractor, sub-contractors, visitors and all other persons, for the proper execution of the work and for meeting the requirements of any local or any other authority.

15.9 Fencing, barriers etc. must be suitably illuminated during darkness.



## **16.0 Electrical Work**

16.1 Initiating work within the areas listed below, anywhere on site, is defined as Electrical Work;

16.1.1 Within sub-stations, switch-rooms and sub-distribution systems;

16.1.2 On all systems 55V AC / 50V DC or over, unless the equipment can be isolated by the physical disconnection of a plug;

16.1.3 On any systems which may suddenly become “live”; and non-electrical work in sub-stations, switch-rooms and transformer rooms;

16.2 All electrical work carried out by the Contractor must conform to the Electricity at Work Regulations and to BS7671 Requirements for Electrical Installations (IEE Wiring Regulations) and their current amendments.

16.3 All electrical work must comply with Chivas Brothers' General Electrical Specification and be carried out by person / persons competent and qualified to do so. All electrical installations shall be completed by person/persons who are members of a suitable body for example, the NICEIC (National Inspection Council for Electrical Installation Contractors) or SELECT (Electrical Contractors Association of Scotland).

16.4 Electrical work carried out in hazardous areas must be completed to the relevant standards for example BS EN 60079 and by persons competent to do so. A suitable recognized qualification is required for those persons for example a COMPEX certificate. As applicable, the Contractor is to ensure that all services are isolated before leaving the premises.

16.5 The Contractor shall not drill into or purposely damage building-fabric to run cables without confirmation that no ACM is present.

16.6 Company requirements relating to Electrical Work Permits include;

16.6.1 Continuous presence of person trained in resuscitation techniques where electrical risk exists; and

16.6.2 Certification for High Voltage work.

## **17.0 Control of Substances Hazardous to Health Regulations**

17.1 All persons carrying out any work on Chivas Brothers' premises MUST comply with all relevant aspects of the Control of Substances Hazardous to Health Regulations (COSHH Regulations).

The Company requires all contractors, on our premises, to comply with the spirit and the letter of the above legislation.

17.2 Local site management must be notified before any hazardous substance is brought on site. An assessment under the COSHH Regulations must be carried out by the Contractor, covering the use, storage, disposal and transportation of any hazardous substances and copies of Safety Data Sheets must be supplied to the Company's site management before the substances are allowed on site. Where required by the Company's site management the Data Sheets must be available at the point of use.

17.3 The contractor MUST ensure that any safeguards control Measures, personal protective equipment etc., which may be called for by the assessment, is provided and properly used.

17.4 Any non-compliance with the COSHH Regulations could result in immediate termination of the contract.

17.5 Contractors are strongly advised, wherever possible, to dispense with hazardous substances, and substitute in their place alternative, innocuous substances. Where this is not possible the inventory of the material held on site should be minimised.

## **18.0 Hot Work**

18.1 All hot work requires a written 'Permit to Work' issued for each individual job. No hot work is to be carried out under any circumstances without a valid permit. Hot work includes welding, burning, grinding, heating with LPG torches or any other activity which in the opinion of Chivas Brothers could lead to a potential loss by fire or explosion. Such activities may include the use of any powered or spark generating tools or equipment in areas where a flammable atmosphere may arise (see section *Work in Potentially Flammable Atmospheres*).

18.2 When carrying out hot work the Contractor is to ensure that a fire extinguisher, appropriate to the risk, is close at hand. Contractor's personnel must be conversant with the methods of operation of such extinguishers. When using welding equipment which has a potential for damage to the eyes, the Contractor is to erect flame proof screen(s) to protect Company and Contractor employees from the flashes of light. In addition, all welding gear must be in sound condition with maximum lead lengths of 15m. Welding must only take place in a well ventilated area.

18.3 All welding, flame cutting and such processes must be carried out in accordance with the guidance set out in HSG139, by staff adequately trained in the use of the equipment involved.

18.4 Flashback flame arresters must be fitted to all oxygen, acetylene, and propane or butane gas apparatus.

18.5 When transporting any gas cylinders, a properly designed trolley must be utilised in which the cylinders can be adequately secured.

## **19.0 Work in Potentially Flammable Atmospheres**

19.1 Using any of the following items within a potentially Flammable Atmosphere is also defined as Hot Work;

19.1.1 portable electric tools/equipment;

19.1.2 all internal combustion engines/ generators;

19.1.3 soldering;

19.1.4 flash photography;

19.1.5 cellular phones; and

19.1.6 all varieties of heating.

19.2 Company requirements relating to work within potentially flammable atmospheres include;

19.2.1 all hot work requirements;

19.2.2 use of continuous atmosphere monitoring equipment by staff trained in its use; and

19.2.3 the provision of electrical equipment constructed to "intrinsically safe" standards

## **20.0 Ethanol vapour levels**

20.1 Work in an area should be halted where ethanol vapour level exceeds 10% of LEL for ethanol (3000ppm ethanol) as indicated by the gas meter which is to be set to alarm at 10% of LEL for ethanol. Entering an area where ethanol vapour level exceeds 10% of its Lower Explosive Limit should be regarded as a flammable atmosphere. Entry to these areas requires a Permit to Work, including measures to reduce the ethanol vapour levels.

The long-term (8-hour TWA) exposure limit for ethanol is 1000ppm. The HSE guideline for controlling short-term peaks in exposure is three times the long-term limit, which is therefore 3000ppm.

20.2 Company requirements relating to work within Flammable Atmospheres include;

20.2.1 staff trained in the associated hazard;

20.2.2 provision of anti-static clothing and equipment; and

20.2.3 the use of intrinsically safe equipment

## **21.0 Working at Height**

21.1 Using any of the following types of equipment, at a height where a fall would be likely to cause personal injury, or accessing areas indicated below, anywhere on the site, is defined as Working at Height;

21.1.1 tower scaffolds;

21.1.2 ladders and step ladders;

21.1.3 mobile and suspended access equipment;

21.1.4 mobile elevating work platforms;

21.1.5 boatswains chairs or rope access techniques;

21.1.6 accessing fragile roofing;

21.1.7 erecting scaffolding and false work; and

21.1.8 accessing any area where a fall resulting in injury is foreseeable.

21.2 Company requirements relating to Work at Height include;

21.2.1 provision of adequately trained staff;

21.2.2 serviced and tested fall arrest equipment (when working without alternative method of protection); and

21.2.3 equipment inspection records.

21.3 An appropriate Rescue Plan requires to be provided, and discussed & agreed prior to works commencing.

21.4 Working on Vehicle 'flat-beds': All works at site require to be controlled – loading or unloading goods-vehicles included. Vehicle-drivers, Contractors, or anyone, must not be allowed to climb onto, or work from the unprotected edge of a vehicle, even if it's 'only for a minute' – it's not permitted! Should access be required, a means of safe-access & fall-prevention must be facilitated in agreement with local on-site management. Access to/from tractor-units requires training to be followed and adherence to the 3-points-of-contact rule maintained at all times. Working at Height (WaH) is a 'high-risk-activity' which requires to be strictly controlled, being governed by our WaH and Permit-to-Work procedures.

## **22.0 Ladders and Scaffolding**

22.1 The following points are designed to provide a general overview of some of the precautions to be taken when carrying out work involving ladders and scaffolds. In addition;

all contractors engaged in this type of work must be fully conversant with; and comply with the letter and spirit of the Health and Safety Executive Guidance concerning Construction.

22.1.1 All ladders must be inspected before they are put into use by the Contractor, to ensure that they are in a safe working condition.

22.1.2 Ladders must extend 1 metre above the working landing or support and must rise at an angle given by one metre out from the wall for every four metres of a rise.

22.1.3 Ladders, when being used in one place for any length of time, must always be tied. If they are only being used in a particular spot for a short period of time then they may be "footed" instead.

22.1.4 Ladders not in actual use must be rendered unusable preferably by being taken down. If they can't be taken down other measures must be taken to render them un-climbable.

22.1.5 Scaffolding must be assembled on safe foundations, be truly vertical and securely fixed to the structure or suitably stabilised. Scaffolding work must be carried out by fully trained and competent Scaffolders and must be inspected in accordance with the appropriate Regulations.

22.1.6 Tower scaffolds are to be erected by suitably trained personnel.

22.1.7 Certification of training will be required for all personnel engaged in the erection or dismantling of any form of scaffolding including quick assembly and prefabricated towers.

22.1.8 Where any form of scaffold or protection is being erected and where overhead working is in progress, a suitable barrier is to be provided to prevent access to the vicinity by any person not engaged on the activity.

22.1.9 Quick assembly/self-assembly type scaffolding **MUST** be assembled / dismantled strictly in accordance with the manufacturers/suppliers written instructions. Contractors **MUST** ensure that their personnel who use/assemble/dismantle this type of scaffolding are provided with, and comply with, manufacturers/suppliers written instructions and have received suitable training.

22.1.10 Particular attention must be given to the provision of guard rails and toe boards on all scaffolding, including the movable quick assembly type. This is to prevent the fall of tools, materials and people.

22.1.11 Materials should not be stored on scaffolding to a height above the toe boards, unless wire guards have been fitted. In every case care must be taken to ensure that the scaffolding is not overloaded by the storage of materials.

22.1.12 Scaffolds must be inspected by a competent person at least every 7 days and also if exposed to weather conditions likely to affect its strength or stability. The results of the

inspection must be recorded. Daily pre-use inspections are also required to be carried out by a competent person.

22.1.13 Where a scaffolding inspection register is required this is to be available for inspection by the Company. A scaftag system shall be used, and applied to the scaffold to confirm the scaffold has been inspected and is safe to use. Subsequent modifications and inspection shall also be recorded on the scaftag.

22.1.14 Any scaffolding left incomplete for any reason, including alteration, must as far as practical be rendered un-climbable and must also have notices clearly displayed warning of the danger of the incomplete scaffold including an instruction prohibiting use.

Any scaffolding left erected and unattended in any location where unauthorised persons, could gain access to it, is to be rendered un-climbable.

## **23.0 Roof Work**

23.1 Roof Work is defined as any access onto a roof which, due to its construction and / design, would expose a person on the roof to the risk of falling off, or falling through the roof i.e.

23.1.1 Fragile roofs, e.g. cement asbestos sheeted roofs

23.1.2 Any type of roof incorporating non load bearing roof lights

23.1.3 Any type of roof with no edge protection i.e. with parapets / barriers less than 930mm in height

23.1.4 Any type of roof where the activity to be carried out on the roof will create gaps in the edge protection or openings in the roof

23.2 The following is designed to give a general overview of some of the precautions to be taken when carrying out roof work. In addition we require all contractors engaged in any work on one of the company's roofs, to be fully conversant with, and comply totally with, the letter and spirit of the Health and Safety Executive Guidance "*Safety in Roof Work*".

23.2.1 Access to roofs will only be permitted after the formal approval of the Contractor's Method Statement by one of the Company's authorised issuers of Roof Permits followed by the issue of a 'Permit to Work' and 'Roof Permit'.

23.2.2 Where a valley gutter of suitable construction is used as a means of access and the roof next to it is covered by fragile materials, an approved safety frame may be used subject to the approval of the Company's Safety Adviser.

23.2.3 Roof edge protection should be erected at the edges of flat and sloping roofs. For sloping roofs the barrier should be high enough and strong enough to stop a person who is rolling or sliding down the roof slope. Roof edge protection must be fitted with toe boards or

suitably positioned third rail to prevent persons or materials which slide down the roof from passing under the mid rail.

23.2.4 Any proposal to use roof edge protection of the type fixed by expanding, or resin, anchors to walls must be approved by the Company's Civil Engineer. Submissions for approval must be supported by a site specific risk assessment prepared by a Chartered Structural or Civil Engineer. On removal of any such edge protection, the fixings, including imbedded anchors and projecting rods, must be removed and holes filled with a suitable coloured mortar.

23.2.5 Openings and fragile skylights should either have a barrier around them or be covered. Any cover should be substantial and preferably fixed in position. If this is not possible it should be marked to show its purpose.

23.2.6 On most sloping roofs purpose-made roof ladders should be used to give a secure foot-hold. These must be adequately secured to stop them slipping. The best way to do this is to use a ridge iron which bears on the opposite slope of the roof.

23.2.7 Waste material should not be thrown to the ground. Use debris chutes or lower the debris in skips or baskets.

23.2.8 Full and proper consideration must be given to the regulations concerning safety nets, safety sheets, safety harnesses and other suitable and sufficient equipment and such devices must be provided and used to comply with the Regulations. Where any such safety equipment is used appropriate certification will be required.

23.2.9 Any doors leading to the roof may be used as a fire escape route and therefore must not be obstructed.

23.2.10 The Principal Contractor is responsible for carrying out the necessary strength check prior to placing or leaving any heavy weights on a Company roof.

Similar checks must be carried out prior to installing any cranes or lifting tackle that may damage the structure or the covering.

## **24.0 Lone Work**

24.1 Lone working includes any situation where personnel are required to operate alone, out of the sight or hearing range of others, i.e. sole presence on site, remote locations on populated sites, or any situation where it could take a significant time to realise an incident had occurred. Precautions should take account of normal work and foreseeable emergencies, e.g. fire, equipment failure, illness and accidents. Contractors should identify situations where people work alone and risk assess aspects such as special risks within the workplace, safe access/egress, can equipment, plant, substances and goods be safely handled by one person, is there a risk of violence, are women or young workers especially at risk if they work alone

and is the person medically fit to work alone? The controls, communication and level of supervision required is a management decision which should be based on the findings of risk assessment. All varieties of Permit to Work activity will normally be prohibited.

## **25.0 Work with Asbestos**

25.1 Any contractor required to work with asbestos containing materials must be appropriately licensed with the Health and Safety Executive under the Control of Asbestos Regulations for works with asbestos insulation or asbestos coating.

25.2 Company requirements relating to Work with asbestos include;

25.2.1 The requirements of the Control of Asbestos Regulations will be, at minimum, met.

25.2.2 Works will only take place on asbestos containing materials by contractors appropriately licensed with the Health and Safety Executive under the Control of Asbestos Regulations for work with asbestos insulation or asbestos coating.

25.2.3 Where possible, contractors will be selected from the Asbestos Removal Contractors Association (ARCA).

25.2.4 All contractors working with asbestos containing materials must have insurance cover for the asbestos works proposed.

25.2.5 All asbestos containing materials are stored safely and correctly.

25.2.6 Before commencing work on any material which can not be safely guaranteed that it is Asbestos free, a check must be carried out either by referencing the site Asbestos Register and / or by obtaining specialist advice.

25.2.7 It is the responsibility of the Contractor that before starting any work where asbestos is present, he must ensure that an adequate assessment is carried out in order to ascertain the precautions needed to control the exposure of workers and others to asbestos. The assessment is the responsibility of the Contractor intending to carry out the work; in most cases the assessment should be in writing.

25.2.8 In most cases, work involving asbestos can only be carried out by someone who holds a license from the Health and Safety Executive. Fourteen days' notice must be given to the local Health and Safety Executive office, before asbestos removal commences.

25.2.9 All work with asbestos should be carried out in line with HSE Guidance.

## **26.0 Process Intervention**

26.1 Process intervention is defined as any activity whereby a contractor is required to access or intervene in process pipe work.



26.2 Prior to the process intervention, the contractor and company representative must complete a process intervention checklist, detailing the isolations and controls in place to ensure safety during the process intervention activity.

## **27.0 Fire Precautions**

27.1 Initiating work which involves an impairment of systems, fixed equipment or statutory provisions relating to fire safety, anywhere on the site will require a Fire Precautions Permit.

Typical examples include;

27.1.1 work which renders a sprinkler system, or part of it, inoperable;

27.1.2 work which renders a fire alarm system, or part of it, inoperable;

27.1.3 work which renders systems or equipment intended to provide local protection, inoperable, (e.g. fire suppression systems within cooker hood, deep fat fryers, fire doors, breaches of fire containment arrangements, etc.); and

27.1.4 work which causes significant impairment within a fire escape or exit route.

27.2 Company requirements relating to Fire Protection permits do not place any specific requirements on Contractors.

27.3 It is the responsibility of the Contractor to ensure adherence to fire laws and regulations.

27.4 If a fire should occur, or an alarm sound in an area where work is in progress or where Contractor's employees are present, these employees will assemble under the direction of their Supervisor and report to the appropriate Assembly Point.

27.5 Contractors should ensure, before commencing any job, that their personnel know the location of the nearest fire alarm; the emergency evacuation system; the escape routes; the location of fire extinguishers and their methods of use, and the location of the evacuation assembly point.

27.6 Company firefighting equipment is not to be used for any purpose other than firefighting.

27.7 Smoking is not permitted within the Company's premises except in areas clearly designated for the purpose.

27.8 It should be noted that even in areas where "Hot Work" is permitted, the No Smoking restriction still applies. Failure to comply with this restriction will result in the individual being instructed to leave the site.

27.9 No highly flammable liquids or liquefied petroleum gas may be brought on site without the permission of local management. Containers of petrol will not normally be allowed on site. All flammable material must be stored in an appropriate manner.

### **28.0 Cartridge Tools**

28.1 Cartridge tools are not generally permitted on Chivas Brothers' sites. In circumstances where there is no practical alternative their use may be sanctioned subject to the provision and approval of a Risk Assessment and Method Statement.

28.2 Cartridge tools operated by gas canister may be acceptable in certain circumstances and locations but will require to be approved by Chivas Brothers' Risk Services Team before their use will be permitted. Use should not be assumed when tendering for work.

28.3 Operators must have been fully and thoroughly trained in the use of the equipment by attendance at a properly organised course of instruction and is in possession of a certificate, issued by a competent person certifying that the operator is proficient in the safety aspects of the use of the equipment.

### **29.0 Cranes, Hoists and Lifting Tackle**

29.1 Cranes, hoists, lifting tackle of any type, belonging to the Company, must not be used by the Contractor without prior written permission from a person of authority within the Company.

29.2 Fork lift trucks belonging to the Company are never to be operated by the Contractor or his employees unless specifically authorised in writing. Contractors must keep a safe working distance from Fork Lift Trucks whilst in use (at least 2 metres).

29.3 Contractors operations must meet the stipulated requirements of the Provision and Use of Work Equipment Regulations, the Lifting Operations and Lifting Equipment Regulations and the requirements of BS7121.

29.4 All lifting appliances, cranes, hoists, chains, pulley blocks, gin wheels, slings etc. must be in good order and conform to the Lifting Operations and Lifting Equipment Regulation. No lifting appliance will be used on site until a valid Statutory Thorough Examination Report Test Certificate has/have been inspected by the Company's staff. Operator training certification is required for all powered lifting equipment.

29.5 All lorry loader cranes must be fitted with an interlocking system (or equivalent Engineering solution) to prevent the crane operating without stabilizers being deployed.

29.6 Any lifting work must be pre-planned. Where required lifting calculations and drawings must be supplied to the Company before work takes place.

### **30.0 Demolition**

30.1 The CDM regulations apply to all demolition work including the dismantling of fixed plant. All demolition work must be carried out in accordance with Health & Safety Executive Guidance in Construction. A separate Method Statement must be submitted for all demolition work.

30.2 When demolition work is in progress Contractors are to take adequate steps to ensure that all persons in the vicinity are protected from the hazards of falling debris, e.g. the area must be fenced or cordoned off. Appropriate warning signs must be posted in the area affected. No materials are to be left in a position where they could be a source of danger to anybody. Tools or other materials must never be thrown to the ground from elevated positions.

### **31.0 Drains & Sewers**

31.1 No sand, soil, cement, mortar, plaster, chemicals or substances may be deposited down any of the Company's drains, either by disposal or by way of cleaning tools.

### **32.0 Electronics**

32.1 It is essential that any Contractor working with electronics must use employees who are suitably qualified in the subject. A high degree of expertise is required in the handling, testing and safe use of such equipment.

### **33.0 First Aid**

33.1 All Chivas Brothers' sites have access to first aid equipment including an Automated External Defibrillator (AED) in accordance with the Health and Safety (First Aid) Regulations. First aid is available by contacting the site Security Guard or named first aiders as per site first aid notice.

### **34.0 Gas Work**

34.1 All gas work carried out by the Contractor must conform to the highest standards to accord with the latest Regulations, Requirements and Recommendations.

34.2 It is a requirement that any gas work must be completed by person / persons competent and qualified to do so and it is a requirement that gas installation is completed by

person/persons registered with the HSE and are of a class approved by the Health and Safety Executive, in writing.

34.3 As applicable, the Contractor is to ensure that all services are isolated before leaving the premises and that all persons concerned are advised thus in writing.


It is a requirement that all Contractors ensure that all workmen under his control who are to undertake gas work are trained, competent, and suitably qualified to do so. Evidence of

individual's registration to the Gas Safe register and carry a Gas Safe Registration card is mandatory.

34.4 It is a requirement that Contractors who undertake gas work have independent public liability insurance for a minimum sum of £1,000,000.

### 35.0 Personal Protective Equipment

35.1 Personal Protective Equipment (PPE) to be worn while on site, or engaged in specific tasks shall be described on the Contractor's method statement, and agreed with the Company's representative at the pre-start meeting, and be provided by the Contractor, and be fit for purpose in line with the 'The Personal Protective Equipment at Work Regulations'. Once appropriate risk control strategies have been implemented it may be necessary to use identified PPE e.g.:

Hi Viz	Safety Footwear	Hard Hat	Hand Protection	Disposable Gloves	Hearing Protection	Goggles	Full Face Visor	Respirator	Dust Mask	Chemical Apron	Overalls	Harness
												

As a minimum the **highlighted PPE** above must be worn at all times when out-with normal office environment or away from designated safe-routes – for all other tasks PPE will be guided by adequate risk assessment and formally communicated by specific Method Statement.

35.2 Head Protection must to be worn on Construction sites. It is mandatory to wear head protection i.e. a helmet constructed to EN397 (or equivalent standard) whenever engaged with "building operations" and "works of engineering construction".

35.3 It is the responsibility of all employers to provide such safety helmets for their staff or for the self-employed to provide their own safety helmets. Helmets must be replaced at intervals specified by the manufacturer, and be in sound condition. Head protection must be worn at all times except when there is clearly no risk of head injury from falling objects or risk of striking the head against something. In all cases, it must be assumed that head protection is required

on Chivas Brothers' sites until such time as the Principal Contractor or Site Manager in control gives specific instructions to the contrary. Safety footwear and high visibility clothing is normally worn although will be subject to the findings of the relevant risk assessment.

### **36.0 Lead**

36.1 It is the Contractor's responsibility to ensure that all employees under his control are aware of their responsibilities and liabilities with respect to all Regulations and Legislation governing the control of lead and that full compliance is met. In particular your attention is drawn to the Approved Code of Practice for the Control of Lead at Work Regulations.

36.2 If workers are likely to be exposed to lead levels which exceed current control limits then protective clothing and/or respiratory protective equipment should be provided and used.

36.3 Consideration of the potential presence of lead based primers / paints must be included in the assessments of Hot Works, e.g. burning of vessels.

### **37.0 Liquefied Petroleum Gas - LPG**

37.1 LPG fired equipment is not permitted on Chivas Brothers' sites unless specific exemption is given and recorded. The incorrect use of LPG fired equipment can give rise to significant hazards, particularly in confined locations. The hazards are two fold, first the build-up of an explosive concentration of gas due to a leak, flame failure or an inadequately turned off valve and second the build-up of a poisonous atmosphere due to inadequate ventilation. In both cases the smaller the building or room concerned the more rapidly a dangerous situation can build up. Detailed guidance concerning the use and storage of LPG can be found in the Health & Safety Executives Guidance notes. Chivas Brothers require all persons handling any form of LPG on our premises to conform fully to the letter and spirit of those notes.

37.2 The following represents a basic outline of requirements relating to the storage of LPG on Chivas Brothers' premises; it is stressed that compliance with the full letter and spirit of the Health and Safety Executive's relevant guidance notes on the use and storage of LPG will be the minima. This includes:

37.2.1 LPG cylinders, when not in use, are to be stored in the open air in a well ventilated area at least three metres away from any cellar, drain, excavation or hollow where vapour may collect.

37.2.2 LPG cylinders are to be stored at least three metres away from oxygen cylinders, other flammable liquids, oxidizing materials and toxic or corrosive substances.

37.2.3 Valves of so called "empty" cylinders are to be kept closed as are those of full cylinders. Plugs, shrouds and caps are to be kept in place on all cylinders.

37.2.4 All LPG cylinders are to be stored with their valves uppermost. LPG cylinders are to be stored in a lockable, non-flammable wire cage. The cage is to bear the following notices (If pictorial signs are used they are to conform with the Health and Safety (Safety Signs and Signals) Regulations):

37.2.4.1 NO SMOKING - NO NAKED LIGHTS

37.2.4.2 HIGHLY FLAMMABLE - LPG

37.2.5 At the end of each working day gas supplies to all equipment are to be turned off. Any cylinders or equipment in confined spaces are to be removed from such areas. Special care is to be taken to ensure that cylinders and equipment are not tampered with or vandalized. Extra special consideration must be given to preventing children gaining access to unattended LPG cylinders or LPG fired equipment.

37.2.6 Any contractor or any other person with any LPG cylinder(s) on site who finds himself unable to comply with the foregoing is to remove his LPG cylinder(s) from the site for overnight storage elsewhere.

## **38.0 Machinery**

38.1 All machinery used by the Contractors must conform to appropriate Regulations. Particular attention should be paid to the Provision and Use of Work Equipment Regulations.

38.2 Whilst on company property, no guards or protective device may be removed or misused by the Contractor or his employees, from any machine, lift or other facility.

It is the responsibility of each individual Contractor to ensure that all machinery (e.g. power tools etc.) in their control are maintained to a safe standard and are serviced on a regular basis by person/persons competent to do so.

38.3 Power tools with integral dust control should be utilised wherever possible and Operatives expected to wear RPE require to be face-fit tested. Dust extraction/suppression requires to be facilitated where appropriate.

38.4 Specified Hazardous Machinery (SHM) has been identified at each CHIVAS site, and particular attention is paid to all necessary forms of Isolation and the required competencies

of those contractors expected to work on this equipment - documentary / contractual back-up to notices on plant and PTW will be expected.

### **39.0 Control of Noise at Work**

39.1 All Contractors should be aware of the requirements of the Control of Noise at Work Regulations.

39.2 The Control of Noise at Work Regulations deal with the daily personal exposure to noise of persons at work. Under certain circumstances requirements are placed on employers, employees and the self - employed to make an assessment of the exposure to noise. If the exposure exceeds certain levels then information, instruction and training about risks to hearing must be given and ear protection must be provided and worn.

### **40.0 Overhead Electric Lines**

40.1 Any external work which may involve cranes, excavators, tipping lorries, scaffolding, "cherry pickers" or other metallic equipment e.g. hand tools coming within 15 metres of overhead electric lines suspended from steel towers or within 9 metres of lines suspended from wooded, concrete or steel poles, must have the specific prior written approval of the local Electricity Company .

40.2 The Contractor must obtain and follow the guidance contained in HSE guidance notes concerning "Avoidance of Danger From Overhead Electric Lines". Contact with the local electricity company must be made where the H.S.E. guide on separation distances cannot be achieved and the electricity company's requirements must then be followed.

Any necessary provision of separation barriers, "goal posts" and marker bunting will be the responsibility of the individual contractor.

### **41.0 Painting & Decorating**

41.1 Particular notice should be taken of the legislation pertaining to the following activities:

41.1.1 When using spraying equipment or pressure vessels, the Pressure Systems Safety Regulations will be complied with.

41.1.2 Lead based paints and primers carry special regulations. The Contractor must discuss with their Chivas representative before using these.

41.1.3 Fire is always a risk when dealing with paints etc. Contractors apply controls within the Health & Safety Executive's Guidance concerning - Spraying of Flammable Liquids.

41.2 Chivas Brothers' requirements under "Ladders & Scaffolding" also apply to decorators.

## **42.0 Portable Power Tools**

42.1 All portable electric tools must comply with the Electricity at Work Regulations and the latest edition of the IEE Regulations. Portable tools above 110 volts are generally unacceptable. In hazardous areas only equipment certified as safe in flammable atmospheres are acceptable, this includes portable phones, radio pagers and radios.

42.2 All portable electric tools and equipment must be accompanied by a current test certificate. The Company reserves the right to inspect/test any electrical equipment brought onto our premises.

42.3 Should 240v power tools be absolutely necessary, then a residual current device (RCD) must be used at all times. The RCD must operate if the earth leakage current exceeds 30 milliamps and must have an operating time of less than 30 milliseconds. 39.4 When the utilisation of an RCD is required, then it must be plugged directly into the 240v power supply and not into any subsequent extension leads.

42.4 Transformers for 110v power tools and electrical items other than tools e.g. radios, kettles, transformers etc. which are 240v, may be utilised without an RCD unit so long as the power lead does not exceed 1 metre in length and is plugged directly into a fused socket outlet.

42.5 It is a requirement that each Contractor is to supply his workforce with the appropriate residual current device(s), as applicable, and that the device(s) is/are tested on a regular basis by utilising the "test button".

42.6 Compliance with respect to the Electricity at Work Regulations is required in respect to any electrical work undertaken by a Contractor. It is a requirement that each Contractor ensures that all employees under his control are trained in the safe operation of portable power tools and the Health & Safety aspects of each machine in use. Each Contractor must ensure that all power tools are used in accordance with the manufactures written instructions.

42.7 Where tools pose a potential eye injury hazard e.g. disc tools, circular saws etc., safety goggles or spectacles to comply with BSEN 166 must be worn.

42.8 All portable power tools must be in good condition (including the lead or flex) and be suitably earthed or be double insulated. All plugs must be correctly and safely fitted and be correctly fused.



42.9 It is a requirement of each Contractor that he ensures that all power tools utilised by any employees under his control are serviced and maintained on a regular basis by persons deemed competent to do so.

42.10 When deciding which equipment to provide full account should be given to the Provision and Use of Work Equipment Regulations 1998.

### **43.0 Pressure Systems**

43.1 All work on pressure systems and all pressure systems brought onto Chivas Brothers sites must comply with the Pressure Systems Safety Regulations.

43.2 Transportable gas containers must comply with the Carriage of Dangerous Goods (Classification, Packaging and Labelling) and use of Transportable Pressure Receptacles Regulations.

### **44.0 Safety Knives**

44.1 Knives are used across Chivas. The preferred use is a ceramic blade. The use of metal blade knives, which perform better for certain cutting activities, must be justified by risk assessment and training; they should however have a safety function by design, such as a retractable blade. PPE must be worn when using a metal blade knife, including cut proof gloves and safety glasses. Contractors must always follow general guidance on the use of knives and importantly, cut away from the body. When not in use, securely store metal blade knives in locked toolboxes. Do not loan any metal blade knives to anyone. All knife use must be detailed in RAMS.

### **45.0 Waste Disposal**

45.1 Under Environmental legislation, all contractors must ensure that they comply in respect of any waste disposal.

45.2 Waste may only be transferred to a registered carrier and disposed of in a licensed site. Appropriate documentation (transfer notes) must be prepared and kept for a minimum of 2 years.

45.3 Wastes determined to be special wastes must be disposed of in accordance with current national legislation noting in particular any requirements for pre-notification of disposal and correct documentation.

45.4 Under no circumstances is any waste to be disposed of to Chivas Brothers' bins or skips unless by prior arrangement with site management. It is the Contractors' responsibility to ensure correct disposal.

#### **46.0 Water Supply and Drainage**

46.1 All Contractors are to ensure that any installation undertaken with respect to water supply and drainage is done in accordance with the relevant Local and National Water Regulations (including amendments), the latest edition of The Building Regulations (including amendments) and any other applicable Legislation, Regulations or Codes of Practice.

Installations are only to be undertaken by person/persons competent and suitably qualified to do so.

#### **47.0 Window Cleaning**

47.1 All equipment used by Contractors must be of sound construction, adequate strength and sufficient length, and must be properly maintained.

47.2 Only employees who have been trained to recognise possible unsafe hand and foot holds may be employed on our premises. They must have been instructed in the recognition of all unsafe window cleaning practices by the Contractor. Anyone employed as a window cleaner must be fully insured.

#### **48.0 Working in Bonded Areas**

48.1 Certain of the Company's premises are approved by H.M. Revenue and Customs for distilling, maturing, preparing, conditioning, processing, bottling and packaging of excisable spirits and conditions are imposed in respect of security for the duty on the spirits.

48.2 The following conditions apply to all persons employed directly or indirectly whose duties require access to such premises.

48.2.1 A warning notice is clearly displayed at the entrance to such premises.

48.2.2 Any person affecting an unauthorised entry to such premises found interfering with or in possession of excisable spirits on which duty has not been paid is liable to prosecution by H.M. Revenue and Customs or the Company.

48.2.3 The Company considers it essential that all possible steps are taken by the contractor to ensure that a breach of Customs & Excise (C&E) regulations does not take place.

48.2.4 In pursuance of this, the Contractor must ensure that all his and his sub-contractors' employees are made aware of the penalties of any breach of the C&E Regulations at the commencement of the work and that his supervision exercises strict control of the work force during the course of the work.

48.2.5 In addition, should there be a contravention of this clause by any of the Contractors or his Sub Contractors the Company may regard this as a breach of the contract and terminate it forthwith with consequent prejudice to opportunities to tender for future work for the company.

#### **49.0 Liability**

49.1 No permission or consent under this notice shall in any way relieve the Contractor of liability for accidents, injury or damage under the Contract.

#### **50.0 Parking**

50.1 Space for vehicles within the Company's premises is extremely limited and directions given by Security Guards will be obeyed, to ensure priority for essential services. On-site parking will not be permitted unless previously authorised.

50.2 Permitted use of the Company's car parking facilities will be solely at the Contractor's risk.

#### **51.0 Search**

51.1 Anyone working within the Company's premises is liable to be searched by one of the Company's nominated officials. Contractors' huts and vehicles whether private or otherwise will similarly be subject to search.

#### **52.0 Drugs & Alcohol**

52.1 No persons are permitted on site where they are under the influence of non-prescribed drugs or alcohol.

52.2 No-one may drive or operate machinery contrary to medical advice whilst being prescribed medication which states they may be adversely affected if they do so.

#### **53.0 Emergency Work**

Where the Company must arrange an emergency response using a non-approved contractor, the Risk Services Department will be notified as early as possible to allow the approval process to be applied. Where it is reasonable to do so, an induction seminar will be covered which results in the Contractor's employee achieving Approved Contractors Employee status. If this is not practicable, the Company will provide the essential information to allow the particular task to be completed safely. In this instance, enhanced supervision will be required.

#### **54.0 Company Hygiene Policy**

The Company is committed to providing high standards of hygiene within the organisation in accordance with legislative requirements. We refer to the condition of the plant, the practices

within and the personal hygiene of our personnel including full time, part-time, temporary and contractual workers. All contractors and visitors are required to comply with the Company Hygiene Policy and will be informed of their requirements before entering / commencing work on the premises.

### **PLANT HYGIENE POLICY**

The hygiene of our plant, equipment and personnel is an essential part of the Company's Quality Management System in ensuring that:

- as a minimum we comply with legal requirements and exceed these where appropriate we safeguard our products against contamination (and therefore reduce the possibility of customer complaints)
- we ensure a pleasant and safe working environment
- we reflect our standards to our customers and assist business performance

The hygiene of manufacturing and storage areas will be controlled by company employed personnel and external contractors using the following methods to ensure that the sites and activities comply with the requirements of all relevant legislation.

- clean-as-you-go methodology
- additional schedules, records, monitoring procedures and internal auditor verification

### **Personnel Hygiene – Company Regulations**

The following describes the personal hygiene rules and regulations which are compulsory to all personnel, visitors and external contractors entering our process areas.

All personnel have a moral and legal duty, as food handlers, to ensure that contaminants do not enter our products. The rules and regulations given below are essential in helping us to achieve this and therefore in complying with the relevant legislation

**Work-wear** - In the interests of health & safety and food safety, clothing must be appropriate and suitable. All personnel working within production areas should wear employer supplied work-wear. All work-wear must be changed on a frequent basis. Soiled work-wear is not acceptable. Clothing with glitter, sequins, diamante etc is not permitted within production areas.

All personnel must wear clean work-wear when entering production or storage areas. During exceptionally warm periods the Company's Bottling Manager has the authority to deviate from these rules.

Visitors should always be escorted within production areas and are requested to wear a high visibility vest at all times.

Clearing Glass Breakages - Personnel clearing glass breakages will ensure their work-wear is free from glass fragments before returning to other duties. Any affected work-wear must be removed and replaced before personnel return to normal duties. The removed work-wear must be segregated for laundry.

All visitors to production areas must wear work-wear /PPE appropriate to the area they are visiting. All contractors must wear appropriate work-wear / PPE as detailed in their Authority to Work and any supporting documentation.

**Outdoor Overcoats** - Personnel working within certain areas of the plant are permitted to wear anoraks / padded jackets.

**Safety Shoes** - are mandatory for all personnel working within production areas. This includes temporary workers and external contractors. Any visitors to the site who are required to spend prolonged periods of time within production areas are advised to provide and wear safety shoes.

All visitors must check the requirement to wear safety shoes with the relevant production area manager. No visitors or personnel will be allowed to enter production areas wearing open toe or sandal type shoes.

**Outdoor Clothing** - Outdoor clothing and personal items must not be taken into bottling halls.

**Ear-Plugs / Ear Protection** - The ear plugs provided are mandatory and must be worn in all designated production areas unless prescribed earplugs have been supplied. Furthermore, the ear plugs provided must be worn with the joining cord attached as without this the individual ear plugs pose a product contamination risk.

**Jewellery** - Many items of jewellery e.g. rings, brooches, earrings & other visible studs or rings, necklaces and bracelets have small parts and precious stones, which could potentially fall into product causing contamination of finished product and loss of personal property.

Furthermore, in order to ensure the health & safety of personnel and contractors within our bottling sites personnel are advised that no exposed jewellery is permitted to be worn other than a single wedding band, a single pair of plain “sleeper” earrings (i.e. no two piece earrings) and a wrist watch. In the interests of food safety, any loss of jewellery must be immediately reported to the Company’s Team Leader who will initiate relevant actions, e.g. a product hold must be raised on bottling sites in the event of any such loss.

**Smoking** - Smoking is prohibited throughout the entire workplace other than in any designated smoking areas. This includes company vehicles. This policy applies to all employees, contractors and visitors and extends to the use of electronic vapour devices.

**Eating** - Eating within manufacturing and storage areas is not permitted. Eating is only permitted within designated canteens, rest rooms and offices.

**General Hygiene** - Personnel are reminded that they are involved in the manufacture of a food product and must ensure that they wash their hands after using the toilets

**Illness** - Personnel are reminded that they are involved in the manufacture of a food product and any illness must be reported to their Company contact

**First Aid** - Any cuts must be protected using blue waterproof plasters which are easily identifiable and visible in our products should they become detached. Clinical waste disposal units are available and must be used for all used first aid products as per local arrangements.

**Personal Items** - Personnel are not permitted to take any personal belongings into production areas – this includes mobile phones. Any items deemed necessary for the job will be issued by the Company's Team Leaders and should be left in the halls at the end of the production shift. Money must be kept in pockets or in lockers.

Personnel are also reminded that, in the course of their work, small items of equipment and machine parts should not be left on or near conveyors, work stations or points at which they may become associated with the finished product. All such items must be removed and stored appropriately so as to prevent the occurrence of contamination.

Personnel are also advised that the Company cannot be responsible for theft or loss of personal items left on site.

### **55.0 Sub-Contractors**

Approved Contractors will be required to advise Chivas Brothers of any Sub-Contractors they wish to use in writing. Chivas Brothers will reserve the right to permit the sub-contractor or not.

### **56.0 Apprentices and young person's**

Contractors are required to notify Chivas Brothers of any apprentices/young persons they intend to employ on site so Chivas management may satisfy themselves that all precautions have been taken to assure the safety of that person.

### **57.0 Advice & Contact Numbers**

57.1 The Business SHE Department should be contacted along with your Chivas Brothers representative to provide clarification on any of these requirements.

- Northern Operations 01343 554127
- Southern Operations 0141 531 2406
- Northern Sites 24 hr Contact No. 01542 78 3181

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- Aberlour 01340 872402
- Allt A Bhainne 01340 821 188
- Braeval 01807 590799
- Burncrook Not manned, contact Mulben
- Dalmunach 01340 835307 / 835290
- Glen Keith 01542 783 120 / 783 082
- Glenburgie 01343 850364
- Glentauchers 01542 860 272
- Keith Bond 1 01542 78 3175
- Keith Bond 2 01542 78 3091
- Keith Bond 3 Not manned, contact Mulben
- Longmorn 01343 86 2306
- Miltonduff 01343 554 120
- Mulben 01542 78 3432
- Scapa 01856 875 430
- Strathisla 01542 78 3003 / 3004
- The Glenlivet 01340 82 1700 / 1707 / 1703
- Tormore 01807 510 244
- Southern Sites:
  - Airdrie 01236 768 344
  - Balgray 0141 531 2580
  - Dalmuir 0141 531 2003
  - Dumbuck 1, 2 & 3 01389 723924
  - Hammersmith 0208 250 1801
  - Kennington 020 7820 4200
  - Kilmalid 01389 765111
  - Paisley 0141 531 1801
  - Plymouth Distillery 01752 665292
  - Strathclyde 0141 429 2024
  - Willowyard 01505 504 784

### 58.0 Reference Publications

58.1 Working on Chivas Brothers property requires attention to both legislative requirements and recognised good practice. It must be stressed that it is the responsibility of Contractors to ensure knowledge of and compliance with all relevant current legislation on the part of their employees.

58.2 A list of publications related to the management of health and safety and general Contractor's activities has been prepared as guidance. This list, though not intended to be exhaustive, can be provided by your Chivas Brothers representative. Further information on safety legislation and guidance available can be obtained from the Health & Safety Executive Book Catalogue. Details are available via <http://www.hse.gov.uk/> or the HSE Info line telephone: 0845 345 0055.

## **59.0 General Data Protection – Personnel Privacy**

### CHIVAS BROTHERS - PERSONNEL PRIVACY NOTICE

What is the purpose of this document? Chivas Brothers is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all current and former employees, workers and contractors (including interns and unpaid volunteers) directors, office holders and also agency workers and secondees to the extent that we act as the data controller of their data. As such, some information in this notice will be more relevant to certain categories of individuals: for example, the information about paying salary will primarily apply to those individuals that Chivas Brothers Limited and/or Chivas Brothers International Limited pays directly. The most up-to-date version of this document and other policies referred to in it are available on Chivas Spirit or upon request (if you do not have access to Chivas Spirit).

Chivas Brothers Limited and Chivas Brothers International Limited are each a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any employment or other contract between us. We may update it at any time and/or notify you in other ways about processing of your personal data. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

#### Data protection principles

In accordance with the General Data Protection Regulations (GDPR), the personal information we hold about you will be: 1. Used lawfully, fairly and in a transparent way. 2. Collected only



for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes. 3. Relevant to the purposes we have told you about and limited only to those purposes. 4. Accurate and kept up to date. 5. Kept only as long as necessary for the purposes we have told you about. 6. Kept securely.

The kind of information we hold about your personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are "special categories" of more sensitive personal data which require a higher level of protection.

### Personal data

We may collect, store, and use the following categories of personal information about you:

- Personal details such as name, title, addresses, date of birth, gender, dependents, photographs, telephone numbers, personal email addresses, next of kin, and emergency contact information (including where this information is contained in identification documents).
- Financial details such as your National Insurance number, bank account details, payroll records, tax information, salary, annual leave, pension and benefits information.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
  
- Employment records (including employment contract, start date, working location, job titles, work history, previous salary details, working hours, training records and professional memberships, performance, disciplinary, and grievance records (including in relation to expired sanctions), and time and attendance records).
- Information about criminal convictions and offences.
- CCTV footage, records of access to our premises and other information obtained through electronic means such as swipe card records.
- Information about your use of our information and communications systems.
- Details of your use of the internet and websites accessed, and business-related social media, such as LinkedIn and your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur). This includes technical information including the site accessed by a particular computer, IP addresses, URLs, user IDs, user groups, departments, the dates and times that the site was visited, the length of time that the site was visited for, the bandwidth, the threat level of the site and the site category as applicable.
- Details of your share incentive arrangements, and all information included in these and necessary to implement and administer them.

- Details of any work related travel including mileage and location tracking.

#### Special categories of data

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation, marital status, and political opinions.
- Trade union membership status, if applicable.
- Information about your health, including any medical condition, health and sickness records and genetic information and biometric data and information obtained as part of any drug and alcohol checks.

#### How is your personal information collected?

We typically collect personal information about employees, workers and contractors (including interns and unpaid volunteers) directors, office holders and also agency workers and secondees to the extent that we act as the data controller of their data, through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from

third parties including former employers, credit reference agencies, other background check agencies, banks or financial institutions.

We will collect additional personal information in the course of job-related activities throughout the period of you working for/with us. In some circumstances, information about you may be provided to us by a third party or another member of staff and depending on the nature of that information and the specific circumstances we may also need to store and process such data if it is relevant to the employment relationship.

#### How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances: 1. Where we need to perform the contract we have entered into with you. 2. Where we need to comply with a legal or regulatory obligation. 3. Where it is necessary for our legitimate interests (or those of a third party such as a benefits provider) and your interests and fundamental rights do not override those interests. We may also use your personal information in the following situations: 1. Where we need to protect your interests (or someone else's interests). 2. Where it is needed in the public interest or for official purposes. 3. Where it is needed in relation to legal claims.

Some of the above reasons for processing will overlap and there may be several grounds which justify our use of your personal information.

Examples of situations in which we will use your personal information include:

- Making a decision about your recruitment or appointment, determining the terms on which you work for us and checking you are legally entitled to work in the UK including by reviewing identification documents.
- Paying you and providing you with benefits (including pension, insured benefits, company cars, company credit cards and any incentive plans) and, if applicable, deducting tax and National Insurance contributions.
- Business management and planning, including accounting, auditing, equal opportunities monitoring, and to conduct data analytics studies to review and better understand employee retention and attrition rates.
- Conducting performance reviews, managing performance, determining performance requirements, making decisions about salary reviews and compensation, and assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other personnel including accidents at work.
- Ascertaining your fitness to work, managing sickness and sickness absence, and complying with health and safety obligations.
- To prevent fraud, ascertain compliance with our policies and procedures, and ensure protection of our intellectual property.
- To monitor your use of our information and communication systems, to maintain data security and ensure compliance with our policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To market and sell to you our products or those of other members of our group.
- To arrange/book work related travel and to monitor and track mileage and location as applicable.

#### Our legitimate interests

We consider that our legitimate interests in using your personal information are as follows:

- To maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice.

- To ensure safe working practices.
- To monitor and manage personnel access to our systems and facilities.
- To record absences.
- To protect our networks, and personal data of individuals, against unauthorised access or data leakage.
- To ensure our business policies, such as those concerning security and internet use (including the Telephone, Email, Internet and Monitoring Policy), are adhered to.
- For operational reasons, such as maintaining employment records, recording transactions, training and quality control.
- To ensure that commercially sensitive information is kept confidential.
- To check that restrictions on your activities that apply after our relationship has ended (confidentiality terms and post-termination restrictions) are being complied with.
- For security vetting and investigating complaints and allegations of criminal offences.
- For statistical analysis.
- To prevent unauthorised access and modifications to our systems.
- As part of investigations by regulatory bodies, or in connection with legal proceedings or requests.
- To promote our products to personnel so that they are aware of our current range.

#### If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have with you (such as making a payment to or in respect of you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our personnel).

#### Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required by law or regulation or where the law permits us to do so.

How we use sensitive personal information "Special categories" of sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. The main reason we would need

to hold and process these categories of information is to carry out our obligations under our contract with you. We may process special categories of personal information in the following circumstances: 1. In limited circumstances, with your explicit written consent. 2. Where we need to carry out our legal obligations and in line with our Data Protection Policy. 3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our Data Protection Policy. 4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. We may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about employees or former employees in the course of legitimate business activities with the appropriate safeguards.

Examples of situations in which we will use your particularly sensitive personal information include:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits/incentives.
- We may track information about drug or alcohol use to ensure compliance with our policies.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.
- Where necessary, we will retain information on health and safety grounds for example to track any accidents or risks of industrial injury/illness.

#### Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our policies. We may also use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information

about past and present employees, workers or contractors (interns and unpaid volunteers) directors, office holders and also agency workers and secondees to the extent that we act as the data controller of their data, in the course of legitimate business activities with the appropriate safeguards.

We envisage that we may hold information about criminal convictions. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process. We may become aware, or be notified directly by you, of such information in the course of you working for us.

#### Automated decision-making

For information on the use of automated decision making during the recruitment and job application process, see our Candidate Privacy Notice, a copy of which is available from the HR department and can be found on Chivas Spirit or upon request (if you do not have access to Chivas Spirit). In all other respects, we do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

#### Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations as an employer or exercise specific employment law rights. In limited circumstances, we may approach you for your written consent to allow us to process certain categories of particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us, and once given you are also free to withdraw it at any time.

#### Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law. They may process your personal data in accordance with our instructions, or to comply with any legal or regulatory requirements that we or they may have. We may also share your data in response to a reference request received in respect of you, from potential new employers for example. We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. For example, the following activities are carried out by third-party service providers: payroll, pension administration, benefits provision and administration (including company cars and credit card/expenses), document storage, IT services/software providers, IT security (including Zscaler), CCTV providers and outsourced security providers (including G4S), legal services, training providers, insurance services, employee discount providers, talent management, career progression, recruitment and succession plan providers, HMRC, the Health and Safety Executive, tax, audit and accountancy, travel service providers and mileage/location trackers (including Mileage Count), credit reference agencies, other background check agencies, banks or financial institutions. We may also share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

We will share personal data relating to your participation in any share plans operated by a group company with third party administrators, nominees, registrars and trustees for the purposes of administering the share plans.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group for a number of reasons including to conduct our business activities, as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data, work travel, secondments, in respect of career move opportunities, training, marketing products of the group, and in respect of other group wide/cross-group activities. We will share personal data relating to your participation in any share plans and pension arrangements operated by a group company with other entities in the group for the purposes of administering the share plans.

Transferring information outside the EU

We may transfer your personal information outside of the EU for the purposes described in this policy. If we do this, we will do so using one of the adequate safeguards permitted by regulators for transfers of personal data outside of the EEA, for example we may use the appropriate safeguard of the model contractual clauses approved by regulators.

Data security We have put in place measures to protect the security of your information. Third parties will only process your personal information on our instructions (or the instructions of

another entity in our group) and where they have agreed to keep the information securely and in accordance with our legal obligations.

### Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker, director, officer holder or contractor, (or in the case of an intern, unpaid volunteer, agency worker or secondee to the extent that we act as the data controller of your data, once you are no longer an intern, unpaid volunteer, agency

worker or secondee) we will retain and securely destroy your personal information in accordance with our Document Retention Policy, and applicable laws and regulations.

Details of the proposed maximum retention periods for different aspects of your personal information are outlined in the Document Retention Policy. Particular relevant data may be held for longer where necessary, for example to hold data for a period corresponding with claim limitation periods. Further information if required is available from our Privacy Champion, HR's Privacy Expert or the Privacy Expert for your function or brand team. Or you can send an email to [chivasbrothersdataprotection@pernod-ricard.com](mailto:chivasbrothersdataprotection@pernod-ricard.com) .

### Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (a "data subject access request").
- Request correction of the personal information that we hold about you.
- Request the erasure of your personal information where there is no good reason for us continuing to process it.
- Request the restriction of processing of your personal information or that we stop processing.

This enables you to ask us to suspend the processing of personal information about you, for



example if you want us to establish its accuracy or the reason for processing it or for us to stop processing in certain circumstances.

- Request the transfer of your personal information to another party.

You can exercise these rights by contacting the Privacy Champion or HR's Privacy Expert or the Privacy Expert for your function or brand team in writing. Or you can send an email to [chivasbrothersdataprotection@pernod-ricard.com](mailto:chivasbrothersdataprotection@pernod-ricard.com) .

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

#### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

#### Questions or complaints about this privacy notice

We have appointed a Privacy Champion, Amanda Hamilton-Stanley, to oversee compliance with this privacy notice as well as a Privacy Expert in each of the key functions and brand teams within the business. If you have any questions about this privacy notice or how we handle your personal information, please contact the Privacy Champion, HR's Privacy Expert or the Privacy Expert for your function or brand team. Or you can send an email to [chivasbrothersdataprotection@pernod-ricard.com](mailto:chivasbrothersdataprotection@pernod-ricard.com) . An up to date list of the Privacy Experts can be found on Chivas Spirit or upon request (if you do not have access to Chivas Spirit).

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

#### Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

#### Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Privacy Champion or HR's Privacy Expert. You can also send an email to [chivasbrothersdataprotection@pernod-ricard.com](mailto:chivasbrothersdataprotection@pernod-ricard.com).

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Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you have any questions about this privacy notice, please contact the Chivas Brothers Legal Department.