Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

HEIDELBERG UK
Quality, Health, Safety and Environmental

POLICY MANUAL

Issue: 2.15

Function	Name	Department	Date	Signature
Prepared by:	Delphine Carnet	Lifecycle Business Analyst	04.03.2026	
Approved by:	Jonathan Roch	Service Director	04.03.2026	DocuSigned by: 49A84A8589A44ED...
Released by:	Ryan Miles	Managing Director	04.03.2026	DocuSigned by: Ryan Miles 99ED1990F5254F9...

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Table of Contents

Introduction and Scope 3

General Statements of Policy

Environmental Protection, Health and Safety and Product Safety **4**

Quality **5**

Environmental **7**

Organisation and Planning 9

Organisation Structure

Roles and Responsibilities

Human Resources

Other Resources

System Documentation

Records Maintenance

Health, Safety and Environmental Operational Controls 11

General Data Protection Regulation (GDPR) 12

Business Processes 18

Identifying Customer Requirements

Purchasing Equipment, Parts and Subcontracted Services

Product Receipt, Handling, Storage, Packaging and Delivery

Installation and Service Delivery

Measurement, Analysis and Improvement 22

Control of Measuring and Monitoring Equipment

Internal Audits

Corrective / Preventive Action

Feedback on Performance

Review of Policy, Objectives and Operational Controls

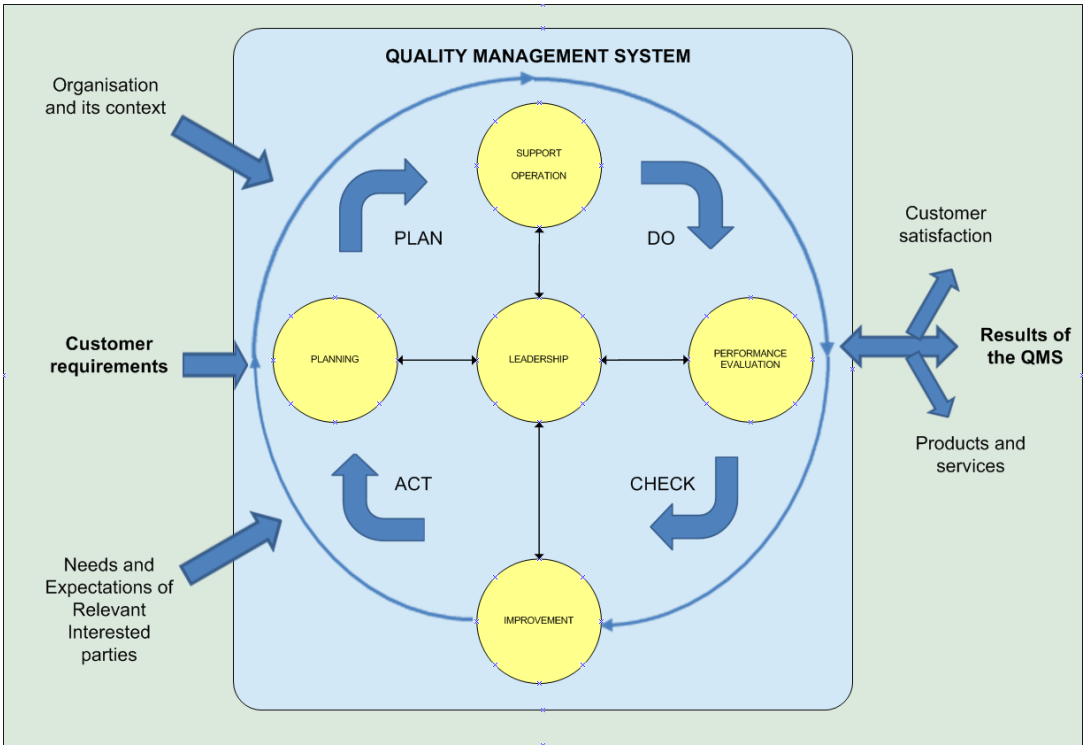
Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Introduction

This manual contains the details of company policy regarding working methods and codes of practice employed by Heidelberg Graphic Equipment Ltd, a market leader in the distribution and servicing of graphic systems and equipment to the printing and publishing industry. Our Management System has been developed to comply with the requirements of the following recognised standards:

- ISO 9001: 2015 Quality Management Systems
- ISO 14001: 2015 Environmental Management Systems

The above standards define a common approach reflecting sound management principles that can be depicted as illustrated as below:



The scope of the QHSE system covers HUK business activities in the sales, installation and servicing of graphic equipment and systems including the distribution of spare parts and consumables. It is applicable across the following departments: - Sales, Service, HR, Process Improvement, Customer Support Centre, Marketing, IT, Facilities, Vehicle Fleet, Consumables, Accounts Credit Control and Spare Parts. An overview of the interaction of these processes is given in Procedure 61 100-01.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Leadership Commitment

Heidelberg are committed to the maintenance of the ISO9001 standard, making sure that the necessary resources and infrastructure are in place. Our commitments include:

a) taking accountability for the effectiveness of the quality management system;
b) ensuring that the quality policy and quality objectives are established for the quality management system and are compatible with the context and strategic direction of the organization;
c) ensuring the integration of the quality management system requirements into the organization's business processes;
d) promoting the use of the process approach and risk-based thinking;
e) ensuring that the resources needed for the quality management system are available;
f) communicating the importance of effective quality management and of conforming to the quality management system requirements;
g) ensuring that the quality management system achieves its intended results;
h) engaging, directing and supporting persons to contribute to the effectiveness of the quality management system;
i) promoting improvement;
j) supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

This manual is a controlled document, any amendments or updates are approved and saved on to a local intranet site to ensure that they are current and consistent in content. This site is accessible by all employees. Procedures have been established where further details regarding implementation of policies are found. Any questions regarding the content of this manual should be addressed to your immediate manager.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

General Statements of Policy

Environmental Protection, Health and Safety and Product Safety

1. Our activities are based on the model of sustainable development and the principle of continual improvement. With regard to our products, we are therefore committed to identifying and implementing safely operable, cost-effective, environmentally compatible and socially responsible solutions over their entire life cycle, from manufacture to disposal. Environmental aspects and product safety are an integral part of our systematic product development process. We shall strive to actively involve our suppliers and business partners in our efforts to achieve this aim.

2. We implement all applicable legal requirements at the Heidelberg site, and in respect to product compliance in the market where we are active. Internally, we use the best available technology for occupational safety and environmental protection when putting new investment into our site and product development. When implementing all these measures, we go above and beyond the legal requirements in so far as this is expedient and cost-effective.

3. Our aim is to safeguard our employees against health hazards and to reduce the potential for impairment of the environment at and around our site. We are committed to actively preventing accidents and emergency situations at our site.

4. We are continually improving occupational safety and environmental protection and the environmental compatibility and safety of our products. Wherever feasible, we are committed to conserving resources and to taking advantage of opportunities for recycling and minimizing waste production.

5. In conjunction with employees, management develops and agrees on the required objectives regarding occupational safety and environmental protection and regularly reviews the implementation of the measures resulting from them, including review of working hours under the Working Time Regulations 2013.

6. We need responsibly minded employees at all levels that actively help to put our occupational safety and environmental protection principles into practice. Through appropriate information and training, we help employees to play an active role in occupational safety and environmental protection and to implement corresponding measures.

7. We shall pursue an open dialog and strive to actively share information with the responsible authorities, shareholders, the public and everyone else involved in the life cycle of our products. We are committed to providing support to our customers on the environmentally compatible and safe operation of Heidelberg products through training and information.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Quality

HEIDELBERG

Our commitment to quality.
Heidelberg Group.

Our customers expect top quality. So do we.
The goal of our efforts is to meet our customers' expectations. We must continue to be the preferred partner of our customers and set the standards for top performance.

What our customers want:	To use our products and services to increase their performance and productivity.
So we will:	· Rapidly carry out all necessary developments · Supply cutting-edge, integrated, secure and environmentally-sound solutions designed to provide maximum benefits · Plan the quality of products with special characteristics, implement the plan, and manage compliance · Meet all promised deadlines · Provide competent advice and consulting in all situations · Make sure the delivered solutions run reliably at all times · Continuously improve the effictiveness of our quality management system
Our most important task is:	To continue systematically improving ourselves, our suppliers, our business processes and especially our cooperation at all levels.

For our customers and ourselves, a decision for Heidelberg is always a decision for quality.

We gladly take this responsibility.
Heidelberger Druckmaschinen AG
09/07/2024

The Management Board

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Environmental Policy of the Heidelberg Group

Vision

Within its industry, the Heidelberg Group is an exemplary sustainable company. By sustainability we understand the long-term balance of ecology, economy and social responsibility.

Legal Compliance

We are committed to meeting all environment-related laws and regulations relevant for the Heidelberg Group.

Communication

We raise our employees' and our partners' awareness of sustainability. Through our communications, we act as an opinion leader in our industry and with all business partners.

Sites

Step by step, we are cutting emissions that are harmful to health and the environment, and we are committed to CO_2 neutral production of our products and CO2 neutral offering of our services over the long term. We use a continuous improvement process (CIP) to ensure environmental impact and health risks are minimized on an ongoing basis or prevented altogether. We give preference to suppliers and partners whose products and services offer environmental and social added value and motivate them to pursue the further development of environmentally friendly offerings and services. We utilize targeted measures to cut energy consumption. We are continuously driving forward the changeover to energy generated from renewable sources. We are ensuring continuous increases in our resource efficiency, with the aim of creating production processes that do not result in any environmentally-critical waste.

Products and Services

We develop and drive forward eco-friendly innovations for all phases of the product life cycle - i.e. manufacturing, operation, and disposal/recycling - that are safe and reliable to operate. We boost the energy efficiency of our products where this is possible and makes sense. We cut paper waste, emissions, and process waste that occurs when operating our products. We expand our portfolio of services and consumables continuously, aiming to provide support for our customers in the eco-friendly design of their production facilities and production processes.

Transportation and Logistic

We optimize our transportation and logistics processes continuously with a view to ensuring environmentally friendly packaging, transportation, and transportation routes.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Environmental Policy of the Heidelberg Group

HEIDELBERG

Our environmental policy.
Heidelberg Group.

Vision: Within its industry, the Heidelberg Group is an exemplary sustainable company. By sustainability we understand the long-term balance of ecology, economy, and social responsibility.

Legal compliance: We are committed to meeting all compliance obligations of the Heidelberg Group such as environment-related laws and regulations.

Communication:
- We raise our employees' and our partners' awareness of sustainability. Through our communications,
- We act as an opinion leader in our industry and with all business partners.

Sites:
- Step by step, we are cutting emissions that are harmful to health and the environment.
- We use a continuous improvement process (CIP) at our sites to ensure that environmental impacts are minimized and health risks are prevented.
- We give preference to suppliers and partners whose products and services offer environmental and social added value.
- We ensure that our production processes are optimized with regard to resource, material and energy efficiency

Products and services:
- We develop eco-friendly innovations for all phases of the product life cycle – i.e. manufacturing, operation, and disposal/recycling – that are safe and reliable to operate.
- We boost the energy efficiency of our products where this is possible and makes sense and reduce process emissions and waste that occur during operation.
- We expand our portfolio of services and consumables continuously, aiming to provide support for our customers in the efficient and eco-friendly design of their production facilities and production processes. In this respect, we place particular emphasis on offering our customers carbon neutral products and services.

Transportation and logistics: We optimize our transportation and logistics processes continuously with a view to ensuring environmentally friendly packaging, transportation, and transportation routes.

We gladly take this responsibility.

Heidelberger Druckmaschinen AG

28/08/2023

Dr. Ludwin Monz
Chief Executive Officer

Tanja von der Goltz
Member of the Management Board

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Values of Heidelberg Group

We commit to being the preferred partner in the Print Media Industry world-wide over the long term. We provide innovative and high-quality solutions which help to increase our customers' performance and competitiveness. Our solutions encompass printing presses, prepress and postpress equipment, consumables, services and consulting services in the print media industry, and also include other products, services and advisory services in the areas of mechanical engineering, electronics, electrical engineering and the metal industry.

Our work focuses on our customers. Our company’s long-term success depends on satisfying their needs.

We strive to attract qualified and capable employees globally. They are fundamental to our success and we invest in their development. We respect their values and cultural backgrounds and we do not tolerate any form of discrimination.

We work constructively with our employee representatives on the basis of mutual trust.

By focusing on the sustainable increase of our company value we ensure that our shareholders earn an adequate return on their investment.

We continually improve our business structures and processes to gain efficiency and clarity.

We ensure that our products are manufactured with high quality standards leveraging processes that are safe, reliable, cost-effective, and environmentally-friendly.

We are committed to maintaining long-term relationships with our business partners based on mutual respect and trust.

We support the principle of sustainability and promote social and cultural interests at our company's sites.

We strictly abide by existing laws and regulations and we adhere to globally accepted standards of good management and leadership.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Organisation and Planning

HUK Organisation Structure

The organisation structure is that detailed in the latest document issued by the Human Resources department**.**

Roles and Responsibilities

It is the responsibility of all employees to carry out their duties in accordance with the requirements of the policy manual and related procedures and processes. All employees shall bring to the attention of their line manager any matters that they believe requires remedial action. Managers will assess the risks involved, promptly take appropriate action and inform the employee(s) who originally raised the issue.

It is the responsibility of senior management headed by the Board of Directors to create the internal environment that supports policy and ensures that the required resources are made available. The Service Director is the senior management representative for QHSE policy matters, with ultimate responsibility resting with the Managing Director.

The policy manual and related procedures identify authorities and responsibilities associated with specific activities needed to meet policy requirements. Each manager shall monitor the activities applicable to their area of responsibility and apply appropriate corrective action in order that defined standards are met. Line managers are also responsible for reviewing processes applicable to their function with a view to improving and updating them in the light of changing circumstances.

The management representative appointed to monitor, report and advise senior management of overall system issues is the company's Process Improvement Executive who shall be supported by Health and Safety Specialist in matters of health, safety and environmental legislation.

Human Resources

Only the most suitably qualified and capable people shall be recruited with the ability to progress into higher skilled and / or more senior positions within the company.

Managers are responsible for evaluating and appraising the effectiveness of previous training, identifying any additional training needs of their staff and establishing training plans that shall be implemented to ensure that all their employees have the commensurate competence to carry out their duties in a safe, effective and efficient manner.

Other Resources

The following support functions shall be provided to achieve policy requirements:

- Facilities maintenance
- Field service transportation
- Information Technology resources
- Technical advice
- Telecommunications
- Process Improvement

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Organisation and Planning (cont.)

System Documentation

The management system is documented and organised as follows:

1. Policy manual - general statements and specific elements authorised by the Managing Director.
2. General company-wide process procedures generally authorised by a Board Director/Senior Manager.
3. Department / location specific process procedures authorised by the department manager.
4. Product service manuals and instructions from suppliers.

The policy manual and documented procedures shall be reviewed and approved prior to issue. A controlled copy of these documents is available to all employees via the company intranet and shall be maintained by the Process Improvement Department identifying their issue status.

To aid the readers of these documents, the nature of any amendments made to them shall be clearly identified and superseded versions shall be either removed or clearly marked as to their obsolete nature. Managers are responsible for making their employees aware of any changes to policy or procedures.

Records Maintenance

Arrangements shall be established for the maintenance of those records identified in company policy and related process procedures as required to verify effective operation of the management system and compliance with relevant legislation. The following shall be defined to ensure that such records are legible and can be readily retrieved:

- Identification of records to be retained and who are responsible for their maintenance
- Periods of retention, method and location of storage

Computer-based records on the central data base shall be protected on the company system by the provision of automatically updated virus protection and by daily / weekly backup of data on medium stored away from company premises. Records inputted on the SAP database shall be retrievable for up to ten years, to meet current legal and quality standards.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Health, Safety and Environmental Operational Controls

The company is committed to complying with current applicable Health, Safety and Environmental legislation and other requirements to which it subscribes, including the following:

C Corporate Manslaughter & Corporate Homicide Act 2007
Environmental Protection Act 1990 (various minor amendments 2008)
Health and Safety at Work etc. Act 1974
Pollution Prevention and Control Act 1999
Coronavirus Act 2020
Carriage of Dangerous Goods by Road Regulations 2009 (Amendment 2014) In Accordance with ADR 2017 (European Agreement concerning the International Carriage of Dangerous Goods by Road) **Carriage of Dangerous Goods (Amendment) Regs 2019* where applicable
Classification, Labelling & Packaging (CLP) Regulations 2008 (various amendments 2015)
Construction (Design and Management) Regulations 2015
Control of Noise at Work Regulations 2005
Control of Substances Hazardous to Health Regulations 2002 2004
Electricity at Work Regulations 1989
Food Safety & Hygiene (England) Regulations 2013 + Food Safety & Hygiene (England) (EU Exit) Regulations 2019 2020*
GDPR General Data Protection Regulation 2016
General Data Protection Act 2018
Hazardous Waste (England and Wales) Regulations 2005 (Amendment 2009) + 2016 + **2018*
Hazardous Waste (Wales) Regulations 2019*
Health and Safety (First Aid) Regulations 1981 (minor amendments 2018)
Health and Safety (Display Screen Equipment) Regulations 1992 (various minor amendments 2002)
Ionising Radiation Regulations 2017
Lifting Operations and Lifting Equipment Regulations 1998
Management of Health and Safety at Work Regulations 1999, 2008
Manual Handling Operations Regulations 1992
Personal Protective Equipment (Enforcement) Regulations 2018
**Personal Protective Equipment at Work Regulations 1992 (amended 2022)*
Producer Responsibility Obligations (Packaging Waste) (Miscellaneous Amendments) Regulations 2016 +2017
Producer Responsibility Obligations (Packaging Waste)(Amendment)(Wales) Regulations 2020
Provision and Use of Work Equipment Regulations 1998
REACH Regulations 2008 (Amendment 2014) +REACH (EU Exit) Regulations 2019, 2020, *2022 *2023*
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
Smoke-free (Premises and Enforcement) Regulations 2006.
The Regulatory Reform (Fire Safety) Order 2005
Fire Safety Act 2021
The Supply of Machinery (Safety) Regulations 2008 (Amendment 2011)
Transport of Dangerous Goods (Safety Advisers) Regulations 1999
Waste Electrical and Electronic Equipment Regulations (WEEE) 2013, 2018
Working at Height Regulations 2005, 2007
Working Time (Amendment) Regulations 2013, Working Time (Coronavirus) (Amendment) Regs. 2020
Workplace (Health, Safety and Welfare) Regulations 1992
UKCA & UKNI UK Declaration of Conformity 2021
Control of Electromagnetic Fields at Work Regulations 2016
Control of Artificial Optical Radiation at Work Regulations 2010
Environmental Act 2021
Energy Performance of Buildings (England and Wales) Regulations 2021, *2022 *2024*

**amended since last publication*

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

General Data Protection Regulation (GDPR)

We are Heidelberg Graphic Equipment Limited. We are based at 1 Furzeground Way, Uxbridge Middlesex UB11 1EZ. You can contact us at webinfo@heidelberg.com. In this privacy notice we describe how we process data, including personal data. We are committed to a lawful, fair and transparent processing of personal data, adhering to the EU General Data Protection Regulation (GDPR).

1. **We process the following (categories of) personal data**

   I. Name. We collect the given names (first name, last name) of customers, and of contacts when they express interest in our goods and services or sign up for our newsletter.
   II. Email address. We collect the email address of customers, and of contacts when they express interest in our services or when they sign up for our newsletter.
   III. Postal address. We collect the postal address of clients for billing purposes, and of customers who order goods and services.
   IV. Telephone number. We collect the phone numbers of customers and contacts.

2. **What (purposes) do we use the data for? We use the data under 1. to offer the following goods and services:**

   I. Email and postal marketing relating to our goods and services.
   II. A Heidelberg newsletter we periodically send to all our subscribers. We also add e-mails that we obtain from general inquiries to this list. Within each newsletter e-mail, an opt-out link is provided.
   III. Providing quotations, proposals, invoices and safety notifications

3. **What is our legal basis for the processing?** We base our processing on consent of the data subject for the newsletter, and the execution of a contract with the data subject for customers and people who order goods and services or other materials.

4. **Where do we obtain the data from (sources)?** We collect the data for our database, including any personal data contained therein directly from the data subjects, who provide it to us.

5. **How long and where do we store data?**

   I. We store client and customer information for at least 7 years to be able to meet our obligations to keep accurate records for the tax authorities.

   II. We store newsletter subscriber information until such subscriber indicates they no longer want to receive the newsletter.

6. **What safeguards have we taken to protect data?**

Taking into account the nature, scope, context and purpose of the processing, we have taken the following technical and organizational measures:

   I. Our database, and the information contained therein, is protected with access control.

   II. Access to the database is limited, not all staff in our organization have full access.

   III. Data submitted via our website is not encrypted in transit.

7. **Who we share data with?** We do not actively share data with any third-parties, other than processors acting on our behalf.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

8. **Your Rights** You have the right to request access to your personal data that we process. You also have the right to: – Rectify incorrect personal data or erase it in certain circumstances. – Restrict or object to the processing of your personal data. – Receive your data so that you can use it elsewhere (data portability). Where we process data based on your consent, you also have the right to withdraw your consent at any time but we would like to point out that this does not affect the lawfulness of the processing before the date that you withdrew your consent. If you wish to exercise any of the above rights, please write us at webinfo@heidelberg.com. Finally, you have the right to lodge a complaint with a supervisory authority. If you do not know who your supervisory authority is, please contact us and we will tell you.

9. **How to contact us?**

You can contact us with any questions you may have about the processing of your personal data or the use of cookies and similar technologies by us, or to exercise the above rights, at the address above or by email at webinfo@heidelberg.com.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Risk Assessments

Risks to the health and safety of employees whilst at work and other persons arising from company activities shall be assessed, to include identifying potential hazards, determining who may be subject to harm, evaluating the risks, recording the findings, implementing effective remedial action and will be reviewed bi-annually.

Accidents and First Aid

Arrangements shall be established for the provision of appropriate first aid materials and qualified first aiders, the awareness training of employees and the reporting and investigation of accidents/incidents. Procedures are in place for the investigation and evaluation of incidents.

Fire Safety and Evacuation

The company shall do all that is practicable in minimising the causes of fire, maintaining a reliable system for detection and providing effective means of escape. Precautions shall be compliant with any specific requirements of the applicable risk assessment for the company's premises and shall include methods for the safe storage of flammable substances away from sources of ignition, the containment of fire and the awareness training of employees by means of regular fire drills.

Contractors and Visitors

The company shall do all that is reasonably practicable to ensure the health and safety of our employees and other people who work on our site, including contractors, and members of the public who may be affected by our operations. The company also recognizes that the presence of contract personnel on site introduces additional hazards which require controlling.

Arrangements for meeting this policy shall include for the planning of subcontracted work including compliance to relevant legislation, selection of suitable contractors and control of their work on site, monitoring of contractor performance and the general management of visitors on site.

Stacking, Storage and Lifting

Facilities and controls shall be provided to prevent accidents due to hazards associated with stacking, storage and mechanical lifting of materials including safe storage design and loading, protection of racking from damage, protection from vehicle movement, provision of suitable lifting equipment and the awareness training of employees in safe practices, including refresher training where indicated.

Electrical Safety

All necessary precautionary measures shall be taken against the risk of death or injury from work involving or being carried out in the vicinity of electricity, applying to portable electrical equipment and workplace installations.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Display Screen Equipment (DSE)

Arrangements for minimising potential health risks to habitual users of display screen equipment shall include conducting risk assessments on workstations and environments, the provision of suitable equipment and the health and safety training of employees in the use of their equipment and workstations. DSE training is provided every two years to all office staff via on-line training solution.

Personal Protective Equipment (PPE)

Equipment shall be made available to employees appropriate to the risks involved and shall comply with relevant British or equivalent European / International standards. Employees are responsible for ensuring that they have the appropriate personal protective equipment for the task in hand, which shall be maintained in a clean and efficient working order. Employees who need to use any specialised equipment shall receive appropriate training and / or instruction.

Work Equipment

Suitable equipment, including machinery and other plant, shall be provided and maintained that is safe to use and without risks to health. Any equipment that poses a specific risk to health and safety shall only be used and maintained by designated employees who have been properly trained

Electromagnetic fields are below the Action Levels of the Control of Electromagnetic Fields at Work Regulations 2016.

Manual Handling

Manual handling activities involving a risk of injury shall be avoided where possible, where such an activity is not avoidable, it shall be assessed and the associated risks reduced to the lowest level practicable. Manual Handling training provided annually to all workshop and field service staff every 12 months.

Control of Hazardous Substance and Waste Materials

Facilities and procedures shall be provided for the reduction in use, safe storage and handling of hazardous substances, including waste, by employees and contractors. Provisions shall be made for containment of all hazardous substances stored and precautions made to control accidental spillages

Waste materials shall be handled, collected and disposed of in a manner that minimises the risks to health and safety of individuals, damage to the environment and promotes a practical approach to waste reduction, re-use and recycling. Hazardous waste materials shall be collected and disposed of only by registered waste carriers or holders of waste disposal management licenses

Noise

Arrangements shall be implemented to minimise the adverse health effects of exposure to noise at work. Where persons are exposed to a daily noise level of more than 80dbA, the risks to hearing damage shall be assessed and the levels reduced when reasonably practical. Suitable and sufficient hearing protection shall be made readily available.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Working Hours

The company shall implement patterns of work that provide the necessary rest breaks, daily rests and annual leave to protect the health and safety of its employees. Working Time Regulation reporting reviewed quarterly.

Employee Information, Instruction and Awareness

Employees shall be provided with suitable and sufficient information, instruction and awareness of health and safety issues associated with their work.

General Facilities and Employee Welfare

The company shall provide a safe and healthy workplace and working environment, taking into account factors of workspace, lighting, ventilation, temperature, cleanliness, traffic routes, building structures and welfare facilities within its' purview.

Site Activities

Employees working at customer sites on installation and servicing work are exposed to and create additional hazards due to the nature of their work in an ever-changing environment. Specific arrangements to reduce the risk to health and safety of HUK and customer employees and the general public resulting from site activities, will be made in conjunction with site rules. Precautions and controls shall be established.

COVID-19

Heidelberg Graphic Equipment Limited confirm that we have complied with the government's guidance on managing risk of Covid-19.

- We have carried out a Covid 19 risk assessment and have the results and systems of work with the people who work here.

Following amendments to government guidance, Risk assessment as carried out on a regular basis and reviewed by our H&S Advisor and the Heidelberg UK management team and the appropriate actions taken.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Business Process

Desired results are achieved more efficiently when related resources and activities are managed as processes, from the identification of a requirement as an input to the satisfaction of that requirement as an output. Such processes are also interrelated with other processes to make up a whole system and therefore the sequence and interaction must be determined, planned and controlled to ensure that they operate effectively and continue to meet company policy.

Documented process maps shall be approved by those with responsibility for their implementation.

Internal communication between functions regarding system processes and externally with customers regarding provision of product and service information shall be effectively implemented.

Identifying Customer Requirements

Written quotations and responses to customer enquiries shall be reviewed by authorised personnel prior to release. Contracts shall be to the company's own standard terms and conditions unless otherwise authorised in writing by a board director.

All contracts and amendments shall be recorded, reviewed and accepted by authorised personnel as identified in procedures. The review shall take into account the ability to meet customer defined requirements and legal obligations, minor changes however to equipment scopes of ongoing service contracts may be made without additional vetting procedures. Contract details and subsequent changes shall be communicated to affected personnel.

For service work where there is no written contract (i.e. Time and Materials) the customer shall be informed of the dispatch time of field service personnel and if they have no prior service record with us, the charge rates.

Technical support shall be provided to customers relating to conformity of product. Referrals made to the Customer Support Centre shall be logged and allocated to appropriate personnel. Records of actions taken on any escalation shall be recorded. The Technical Helpdesk will aspire to solve customer problems over the telephone where possible and if not, refer to service where necessary.

Invoice queries and customer complaints (Disputes) shall be handled in a timely manner and the customer kept advised of any actions affecting them. These issues shall be included as feedback on company performance (see Measurement, Analysis and Improvement).

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Purchasing of Equipment, Parts and Subcontracted Services

Equipment

Purchasing of equipment from our sister companies shall be documented on Purchase Orders, signed by authorised personnel identified in procedures. The subsequent performance of equipment shall be monitored, major non-conformities documented and brought to the attention of the supplier.

Parts and Consumables

The scope of after sales servicing requires the company to acquire spare and replacement parts corresponding to a customer's original equipment. These are requisitioned by field based personnel, often verbally, from central stores who are responsible for delivery to our field engineers / customer premises. When such verbal requests are made, the details shall be recorded both in central stores and via our mService solution.

Parts are purchased from our sister companies by EDI where requirements are identified and recorded by part numbers.

Consumable offerings are from a proven and tested portfolio, procured via EDI link or email from our approved vendors.

Performance of our sister companies' and approved vendors' ability to provide these parts and consumables in a reliable and timely manner shall be monitored. Any subcontracted services having a major direct effect on customer satisfaction shall only be carried out by suppliers who have met pre-set standards, their performance shall be monitored on an ongoing basis with reports documented.

Subcontracted services

Suppliers of services shall be evaluated and selected based on their ability to meet contractual requirements in a manner that minimises the risk to health and safety and environment of our employees, customers and the general public. They are given Approved status and bi-annually monitored.

Product Receipt, Handling, Storage, Packaging and Delivery

Parts received by our third party logistics (3PL) company shall be visually inspected to ensure that the delivery matches the original order (quantity and part number) and that there is no evidence of damage to packaging. Any damaged goods shall be segregated and / or clearly labelled to identify its non-conforming status.

3PL and WLC shall maintain appropriate stock levels of parts and components that are subject to a reasonable level of turnover. Any items that may be subject to a limited shelf life shall be monitored and used within the manufacturers' recommended timescales.

Saleable equipment, parts and components shall be stored in designated storage areas that are protected from damaging elements that could cause deterioration of the product. Receipt and dispatch of product from these areas shall be controlled by authorised personnel who shall record any such transactions.

Sufficient protection shall be given to product during delivery from storage to field service personnel / customers. All hazardous substances will be despatched in accordance with the relevant carriage legislation.

Field Service personnel order customer parts from 3PL location or WLC. Field Service personnel shall not carry stock other than non-critical consumables and they shall be made aware during product training of the need to handle parts in a manner that prevents damage and deterioration.

Precautions shall be taken to protect Electrostatic Sensitive Devices (ESD's) such as plate imagers by the deployment of portable electronic dissipation kits, which are issued to Prepress personnel.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Business Process (cont.)

Any damage caused to customers' property during installation / service / repair activities shall be reported to the customer and recorded on the service report.

Installation and Service Delivery

Installation and service activities shall be planned and implemented by suitably trained personnel. The service process includes planning and dispatch of field personnel through to the completion of service visits and invoice preparation. Service personnel are equipped with training, experience, service documentation, tools, equipment and on-line technical support from specialists.

Product shall be marked with its unique serial number and spare parts shall be identified with their unique part number. Any defective parts received by a field engineer shall be clearly identified and returned to central stores for segregation, disposition and where necessary replacement. Unused and conforming parts returned by an engineer to central stores shall be clearly identified to allow traceability and return to stock for re-use.

Functional / demonstration tests shall be carried out on installed, repaired and serviced equipment at completion of the work to the engineer's and customer's satisfaction. Installed machines shall not be handed over to customers until they have been verified as being suitable by design and construction for their intended purpose.

To enable cross-referencing and traceability, installation and service documentation shall record the job number, applicable part numbers, and description of work carried out, customer name and acceptance of work, engineer's name and the status of the job as complete or incomplete.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Measurement, Analysis and Improvement

It is a company objective to continuously evaluate and improve the effectiveness of the management system. Employees shall be provided with the resources, tools and opportunity to contribute to the achievement of this objective.

Control of Measuring and Monitoring Equipment

Equipment shall be provided that is appropriate to the measurements being made and the required accuracy.

The following items are considered to be susceptible to deterioration in accuracy to such an extent that would adversely affect the validity of diagnostic or verification activities and are therefore subject to calibration/test:

ESD Protection, Torque Measuring Devices, Guillotine Safety Check Kits, Densitometers, Spectrophotometers, Manometers, Bearer Pressure meters, Level table, Belt Tensioner and PAT testers

Each item of equipment shall be identified with its calibration status and a record maintained of its most recent calibration.

A calibration service provider with UKAS accreditation will check the accuracy of the equipment at intervals defined in procedures and reviewed periodically based on previous results. Should equipment be found to be out of calibration, the validity of test results since the preceding calibration shall be verified with appropriate action taken and documented.

All other equipment is exempt from mandatory calibration based on the premise that their accuracy is readily validated by final functional checks carried out on customer equipment or are used for indication purposes only, where accuracy is not critical.

Internal Audits

Personnel independent of the area being audited, formally trained in auditing techniques by a recognised external body shall conduct scheduled internal audits. The results of audits shall be documented and brought to the attention of the persons with responsibility for the area / activity being audited.

Audits shall be scheduled so that on an annual basis at selected company locations, all core business processes and certain support functions and controls are verified to be working to established procedures and confirm that the procedures themselves are effective in meeting company policy and objectives. The frequency and scope of the audits may be increased however in areas of concern or have a high risk.

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

Measurement, Analysis and Improvement (cont.)

Corrective / Preventive Action

Arrangements shall be established for the identification, recording and handling of non-conformities (including the results of internal and external audits) to prevent recurrence corresponding to the level of risk involved, to include the collection and analysis of factual data, assessing the level of risk involved, investigating root causes and implementing timely and effective corrective action

The above measures will equally apply to where potential non-conformities are identified and action is needed to prevent occurrence. Additionally, projects will be conducted to address and develop the business processes to try and prevent any system non-conformities.

Feedback on Performance

The receipt of customer complaints and shall be managed in a systematic manner that will both satisfy external customers and improve the overall performance of the company

Arrangements shall be established to monitor and measure on a regular basis, the key characteristics of company operations and activities that have a significant impact on policy and objectives including information on customer satisfaction levels and compliance with relevant legislation. The Process Improvement Executive shall publish a quarterly review report containing the following elements:

- Internal audit, CARs and Preventative Action results
- External audit results
- Preventative Maintenance (Pro-active actions)
- eShop
- Sales Statistics
- Market Share
- Warranty Fair Dealing
- Digital Performance Measures
- Product Issues
- Service Escalations
- Courier Performance
- 3PL Warehouse Performance
- Working time Regulations
- Complaint (Dispute) / Invoice Query analysis
- Customer Satisfaction Survey (NPS)
- Performance against company set targets

Docusign Envelope ID: 1163399D-76D3-4AF7-937E-95F9F0D9749B

- Approved Supplier Monitoring
- Accidents and Health & Safety

Copies of this report shall be distributed to the board directors, and managers for communication to their employees.

Review of Policy, Objectives and Operational Controls

On a quarterly basis, Process Improvement and management shall evaluate the review reports to ensure the suitability and effectiveness of the system and its continual improvement. Changes to policy, objectives and controls shall be determined from this review with action plans documented, distributed and monitored at subsequent reviews.