



**WRAPID MANUFACTURING
STAFF GENERAL INDUCTION PACK**

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This Pack contains:

- Health & Safety Policy**
- BRC Global Standard Policy Statement**
- General Rules**
- Safety Responsibilities**
- Wrapid First Aiders**
- Appendix 1 Ethical commitment**
- Appendix 2 Data Protection Policy and Privacy Notice**
- Appendix 3 IT Acceptable use Policy**

Job Specific Risk Assessments and company lay out will be covered upon arrival at the site.

Sign below to show you have read this Induction Pack and will follow the requirements indicated there.

Name	
Signature	
Job Title	
Date	

WRAPID MANUFACTURING STAFF GENERAL INDUCTION PACK HEALTH & SAFETY POLICY

It is the Policy of Wrapid Manufacturing Ltd to take all possible steps to ensure the health, safety, and welfare of all employees and any other persons engaged in work for the organization. Along with any third parties who come into contact with the business.

It is the duty of each employee to comply with the company safety policy. And cooperate with the management of the company, to ensure the work place remains as safe as possible.

If any person is in any doubt as to whether anything is safe, or unsafe, then they must assume that it is unsafe until further guidance has been given by their manager, or by the safety officer.

The Board of Directors of the company is fully committed to maintaining safe systems of work, and fully recognizes their overall responsibility for safety in the work place. Any member of staff who does not comply with this safety policy, or any other safety requirement, will be liable to disciplinary action.

COMPANY BRC GLOBAL STANDARD POLICY STATEMENT

The Company has defined its policy on the BRC/IOP Standard as follows:

Policy Statement – BRC Global Standard - to meet the specification for production and as stockists of assessed capability.

The policy of the Company is to provide a high level of workmanship and quality for all our work, which will be a guarantee to our customers that the products that they receive from us will meet our obligations to produce safe and legal products. The company is committed to a process of continuous improvement, which will benefit both our employees and our customers.

The Company's documented BRC Global Standard management system covers the requirements for the conversion of Mylar against the Global Standard for Packaging Material Issue 6.

It is essential that every member of this Company is aware of our commitment to the BRC/IOP Standard, for which a Quality Manual has been prepared. This contains our hygiene/quality procedures, which conform to national quality standards.

This policy is documented in the BRC Global Standard Manual and steps have been taken to ensure that it is understood, implemented and maintained at all levels within the Company. A copy of the Policy Statement will be issued to each member of the company on a personal basis.

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General Rules

The company would like to remind all employees that certain practices must not take place in any production departments or warehouse areas:

No food, gum or sweets should be taken / eaten on the shop floors or in the warehouses. Staff must ensure that they wash their hands after using the toilet and after eating or smoking breaks.

No cups, bottles or drinking containers, other than the ones issued are allowed on the shop floor or in the warehouses. Drinking cups are also provided next to the fountains.

Coats, bags and personal belongings are to be kept in lockers at all times.

No reading of books, newspapers, magazines or electronic equipment on the shop floor or warehouses.

Personal mobile phones must not be used in production or warehouse areas, and should be kept in lockers at all times.

If you are suffering from any medical condition or are on any medication that could impair your ability to do your job effectively and safely then you must declare this to your Manager so that the risks to you and the product can be assessed.

Any contact with infectious diseases must also be reported so that the safety of our food packaging is not compromised.

No chemicals or other hazardous materials should be spilt or dumped on the company grounds. In the event of any spillage, please report this to your Supervisor so that this can be dealt with. All waste should be disposed of in the containers provided.

Hi Visibility Vests or Jackets must be worn in Warehouse areas.

Ear Plugs **must** be worn in areas where high noise levels (85 decibels or more) have been identified. Currently these areas are Envelope Production and Print finishing area. Ear Plugs are recommended but not mandatory in the Card Wrap machines area.

Emergency calls can be taken via the following numbers-

Danni Fletcher – 07929014741 - Production Manager for Mylar, Riston, Envelopes and Print finishing areas

Martyn Radley – 07929014719 – Production Supervisors for the above areas

Steve Fields – 07812965952 – Warehouse Manager

Rafal Rubczak – 07992170908 – Warehouse Supervisor

Jilly Batty – 07791283343 – Production Manager Card Wrap Area

Mariusz Jedrzejewski – 07929014742 – Production Supervisor Card Wrap

Also call the relevant number if you are going to be late, are ill or are not coming in for some other reason.

All employees are required to comply with the above rules which are necessary to ensure the health and safety of our staff, and to comply with our BRC accreditation.

Failure to comply with these requirements could lead to formal disciplinary action.

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Safety Responsibilities

1. Organization and Lines Of Responsibility

Overall responsibility for the health and safety of all persons within the company rests with the Directors of Wrapid Manufacturing Ltd

The Directors delegate this responsibility to the individual operations managers for the purposes of the day to day running of the operation with the direct assistance of individual line managers and supervisors.

Wrapid Manufacturing Ltd has a nominated Safety Manager who has overall group responsibility for reviewing and making recommendations on all matters relating to health and safety.

The Safety Manager who has overall responsibility for the day to day safety operations will be **Kevin Mullins**. Deputy is Viktoriya Angelova.

The safety officer will ensure through the management organisation that:

- All persons employed by the company receive adequate health and safety training. In addition employees will receive adequate instruction and supervision to enable them to undertake their work in a safe manner.
- All plant and equipment are suitable for their intended purpose and that it is maintained in a safe condition at all times.
- All persons working on site, whether or not employees of the company, are adequately notified of all known hazards and protective measures.
- That the company risk assessments, along with all other safety documentation, are brought to the attention of all relevant parties.
- All employees are required to comply with their legal requirements under current National statutory provisions. All staff must co-operate with the management of the company to allow it to comply with the legal requirements for health and safety.
- Individual members of staff who have any concern regarding their own safety, or that of a third party, are responsible for reporting the matter to their manager without delay.
- All members of staff will receive a copy of the safety policy and will be required to sign to state that they have read and understood it. New members of staff will be required to read and sign a copy of the safety policy before they start work and their manager will familiarise, explain and assist them to begin work in a safe manner.

2. Fire Safety

The company will provide the necessary fire fighting equipment in accordance with the requirements of the local Fire Authority. It is the policy of the Company to over rather than under provide such facilities. All employees are required to familiarise themselves with the fire drill before commencing work. Exercises will be arranged at regular intervals. Existing fire fighting equipment will be checked monthly by safety staff and by the external contract engineers on an annual basis. Fire fighting equipment will be inspected and a certificate issued by a competent authority on an annual basis. Alarms will be tested weekly.

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Fire exits must be kept clear at all times. No fire door to or from an occupied room may be locked. Smoking is only permitted in designated area in the car park.

No internal doors are to be wedged or propped open in any way. Appointed personnel will be trained by an exterior body in the safe use of fire fighting equipment.

You should know which extinguishers are available in your immediate place of work. In particular you should ensure that combustible materials do not accumulate around your place of work.

Flammable materials must never be exposed to hot surfaces or direct heat sources.

In the event of a gas leak switch off all equipment and evacuate the premises immediately. Contact the Emergency Services immediately.

In the event of a fire the premises should be evacuated immediately following the information provided on the fire notices and training provided.

Fire extinguishers should only be removed from their wall brackets in an emergency. The removal of fire extinguishers in other cases without good reason will be considered as misconduct.

3. Electrical Safety

Ensure that all electrical equipment you use is in good order. Do not use any electrical equipment that does not appear to be in good order but report it to your supervisor without delay.

Changes to the electrical system (including new plugs) should only be undertaken by competent persons who have been trained and all works required should be reported to the Safety Manager.

Work on 3 phase electrical systems or live plant must never be undertaken by unqualified personnel and live working requires a specific risk assessment to be undertaken.

General Safety Requirements for Electrical Systems

- Switch off all electrical equipment after use. Do not overload sockets.
- Do not allow wires to project into the walkways where they present a tripping hazard.
- Use a residual circuit breaker when operating a portable hand tool.

4. Training

General induction training will be provided for all new members of staff. Additional training will be provided for nominated members of staff as required.

The planning of training in health safety is the responsibility of the Safety Manager. Documented training records will be maintained. If any member of staff feels that he/she could benefit from specific safety training in addition to that which has been assessed as relevant by the Company then they should approach their supervisor.

5. Cleanliness

Good housekeeping in all areas is an essential feature of safety and the prevention of accidents.

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Staff working in all areas must have regard to the following:-

- Ensure that loose and worn flooring is reported to your supervisor.
- Ensure all entrances, corridors, walkways and exit doors are kept clear of obstructions at all times.
- Close all cabinets, cupboards and drawers after use.
- Never overload shelving or store heavy items above head height except on load bearing purpose built racking.
- Never leave a lit cigarette unattended in the designated smoking area.
- Clear away immediately any dangerous substance or spillage. Dangerous substances are marked and are defined as toxic, harmful, irritant, flammable or oxidising.
- Dust and fumes should not be inhaled. If dust or fumes are produced by any activity then cease the task immediately until protective measures have been put into place.
- Equipment must not be left where it can be a tripping hazard.

6. Manual Handling

Lifting and moving loads by hand is the biggest cause of injury in the work place.

Lifting should be carried out in accordance with the following guidelines:

- If a load is awkward or beyond your capability you must get help.
- Check all packaging and articles for sharp edges and projections before lifting.
- Ensure that there are no obstructions in your path before lifting any article.
- Ensure that you can see around a load when lifting it.
- Ensure that there is adequate room to put down a load when you have moved it.
- When lifting stand close to the load with your feet slightly apart. Keep your chin in, bend your knees and keep your back straight at all times. Straighten your knees using your thigh muscles. Always lift in stages (e.g. floor to knee, knee to carrying position).
- Always use your entire body weight in a controlled manner when pushing a load.

Heavy goods are to be lifted in accordance with the Company assessments for manual handling. Do not use lifting equipment unless you have been specifically authorised.

7. Control of Substances Hazardous to Health (Chemicals)

The law requires the company to control the use, disposal and transportation of all hazardous materials.

A formal assessment must be carried out of all materials used by the company and this is available on site at all times for reference purposes. Employees are not permitted to purchase or to bring to work chemicals.

Disposal of chemical products must only be carried out on the direct instruction of the Safety Manager.

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It is a strict requirement of the company that when any person handles a chemical they never mix it with any other chemical product as this can be dangerous.

All containers that holding chemicals must be labelled identifying the correct contents. If marking up a spray bottle with Marker Pen write on the base so it doesn't rub off.

Any unlabeled containers containing chemicals found must be handed into to a Supervisor or Manager without being opened. Any flammable chemicals must be stored in the Flammable Cupboard when not in use.

Chemicals must always be handled according to the instructions with the correct precautions (such as wearing gloves, safety glasses etc) taken. If you do not have the correct data sheet to hand and are unsure how to handle a chemical then ask the Safety Manager for the relevant data sheet guidance.

Do not touch or smell any chemical if you do not know what it is or what precautions to take. If there is a chemical spillage then use the spillage kits provided to contain or clean up the spillage taking into account the usual precautions for handling that chemical. If you are not sure how to do this then report immediately to a Supervisor or a Manager so someone can be assigned to do this ASAP. Dispose of spillage materials using the bags provided. Report the spillage so that the spillage kit can be replenished. **Deliberate or negligent mishandling of chemicals is a disciplinary offence.**

8. Protective Clothing

Where protective clothing is provided it must be worn. It is a strict legal offence for an employee to abuse or disregard safety equipment. You are obliged to use all personal protective equipment which has been provided following a detailed assessment.

One of the major causes of injury in the work place are cuts to the hand. Personal protective clothing in the form of gloves are a significant method of protection from such injuries. Gloves should always be worn when handling sharp items and when moving loads.

Persons wishing to handle chemicals must first read the chemical data sheet/ assessment to determine the precise nature of the clothing required for any particular product. Anyone going into the Mylar or Riston Clean areas (including office staff, visitors, contractors) must wear hair nets and Wrapid coats / overalls and wash their hands.

9. Visual Display Screen Equipment

The company will carry out formal assessment of all work stations where visual display screen equipment is used. It is the policy of the company to provide eye tests for visual display screen work where an employee is required to work with this equipment.

10. Machinery

Only trained personnel may use machinery provided in the work place. If you have not received training then under no circumstances should you attempt to operate it.

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Prior to authorization being given to operate machinery an assessment of your competence will be carried out.

If at any stage whilst using any item of machinery you begin to feel unwell you must stop what you are doing, isolate the plant concerned via the remote electrical supply switch and report to your supervisor.

Never talk to another member of staff when you are operating machinery. Do not approach or distract any other employee operating machinery.

11. Guarding

It is not only dangerous but illegal to remove a guard from a machine unless you need to clean or repair it.

Only trained personnel may clean or repair items of plant which require guarding to be removed. Equipment which is to be cleaned must be isolated electrically. The electrical supply should be locked out and the key retained by the personnel working on the machine.

If any part of the equipment you are using is unguarded you should stop work immediately, isolate the plant concerned, and report the matter to the safety officer without delay.

12. Visitors & Contractors

All visitors and contractors must report to the main reception.

Any contractor carrying out work at the premises may be required to provide the following details to the Safety Manager in advance of the work commencing:

- ✓ Health and Safety Policy
- ✓ Risk Assessments
- ✓ Chemical Safety Assessments
- ✓ Liability Insurance Cover.

Contractors carrying out electrical, gas or hot works will be issued with a permit to work before commencing work. A permit to work will also be required for persons working at height or in confined spaces.

All contractors working for the company are required to comply with this safety policy and with all other written safety instructions.

13. Risk Assessments

The company has produced detailed written risk assessments for all members of staff.

All staff are required to read the Wrapid Manufacturing Risk Assessments relevant to them and abide by their requirements at all times.

14. First Aid, Incidents and Hazards

The company will provide first aid facilities in accordance with the requirements current National standards. The nominated first aiders will be published on the notice board.

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If you suffer an injury, however slight, report it to your manager and the nominated first aider at once. The injury must be entered in the accident book and you will be required to provide a full explanation of the events surrounding the accident.

If a serious accident occurs the first aider should be contacted at once. The first aider will arrange for an ambulance to be summoned immediately.

If chemical come into contact with your skin or eyes or if they are swallowed or inhaled then seek immediate first aid. Your supervisor will have access to the chemical data sheets and the assessments which provide detailed advice on the measures to be taken to counteract the effects of each chemical used by the company.

IF AT ANY TIME YOU ARE CONCERNED BY ANY ASPECT OF SAFETY IN THE WORK PLACE THEN STOP WORK AND MAKE IMMEDIATE CONTACT WITH THE SAFETY MANAGER. IF YOU CANNOT CONTACT THE SAFETY MANAGER THEN MAKE CONTACT WITH YOUR SUPERVISOR.

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WRAPID FIRST AIDERS



MICHAEL FIRTH
Card Wrap

MARIUSZ JEDRZEJWESKI
Card Wrap

NASRAT BI
Card Wrap



ALEX HOLMES
Clean Room

DAVID MARSHAL
Envelopes (Nights)

PHIL LAMB
Envelopes



MARTYN RADLEY
Unit 4

VIKTORIYA ANGELOVA
Thornton Road

JASON FOULDS
Card Wrap

ARABELLA BROOKS
Factory Office

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WRAPID FIRE MARSHALS**

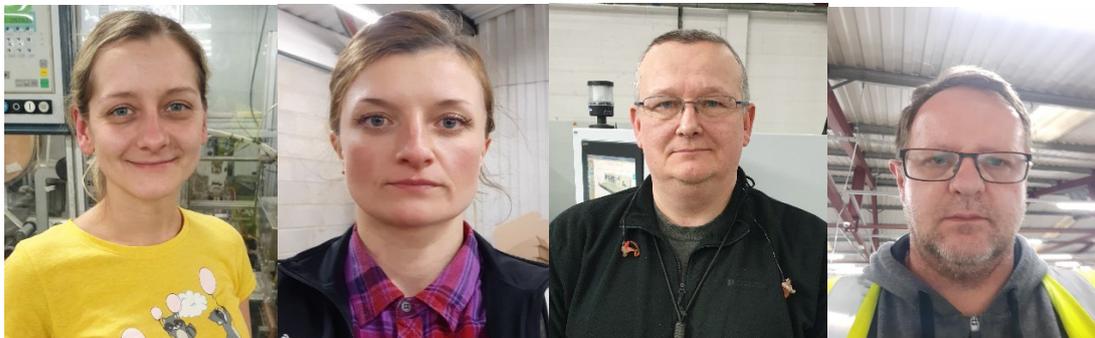


TONY FLETCHER
Card Wrap Office

MARK ABSON
Mylar

DAVE MARSHALL
Envelopes (Nights)

MARTYN RADLEY
Unit 4



MARLENA RUGALA
Card Wrap

ALEKS OBIEGLY
Card Wrap

WAYNE BRYAR
Unit 4

MARIUSZ JEDRZEJEWSKI
Card Wrap



VIKTORIYA ANGELOVA
Thornton Road

JASON FOULDS
Card Wrap

RAFAL RUBCZAK
Warehouse

NASRAT BI
Card Wrap

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Appendix 1 Ethical Commitment

This Appendix reminds you of Wrapid Manufacturing Ltd's commitment to operate according to recognized Ethical principles.

We will provide reminders every year so you are continuously aware of this commitment.

The Quality/Health & Safety Compliance Manager is responsible for providing this training information to all staff.

Policy Statement

We believe strongly in ethical principles & good stewardship and are committed to the concept of Universal Rights as outlined in the United Nations Guiding Principles on Business and Human Rights covering:

- The state duty to protect human rights
- The corporate responsibility to respect human rights
- Access to remedy for victims of business-related abuses

We are proud to guarantee that we trade according to the principles of the **Ethical Trade Initiative (ETI) Base Code** (shown below).

We are also members of **Sedex** (Supplier Ethical Data Exchange), a not for profit membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains.

The ETI Base Code (As amended 01 April 2014)

1. Employment is freely chosen
 - 1.1 There is no forced, bonded or involuntary prison labour.
 - 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
2. Freedom of association and the right to collective bargaining are respected
 - 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
 - 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
 - 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
 - 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.
3. Working conditions are safe and hygienic
 - 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
 - 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
 - 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
 - 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

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3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers.

Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety;
- and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

7. No discrimination is practised

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-

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contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

Modern Slavery policy

Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Wrapid Manufacturing Ltd says NO to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and relationships to ensure that modern slavery is not taking place within our own business or in any of our supply chain.

This statement is made in accordance to s.54 of the Modern Slavery Act 2015 and outlines what is in place in order to help combat modern slavery.

Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains. Our Policy Statement reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking does not take place anywhere in our business or within our supply chains.

We will treat any breach of our Anti-slavery and Human Trafficking Policy very seriously. For example, any employee who breaches the policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.

Our Workers

ID checks are carried out on all workers and induction includes our commitment to the Ethical Trade Initiative with refresher training annually.

If a worker was to report that they are being trafficked or controlled under the definition of modern slavery then this would be immediately reported to the Police.

Our Suppliers

Our supply chain includes the sourcing of raw materials including film, paper and inks related to the manufacturing of packaging.

Our suppliers work to UK and EU regulations and requirements

Commitment

We have a constant commitment against Modern Slavery and will continue developing our internal practices, working in partnership with our suppliers to maintain our zero tolerance stance.

As Approved by: Steve York

Joint Managing Director

23rd August 2017

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Appendix 2 Data Protection Policy & Privacy Notice (approved 25 May 2018)

We only keep personal data that is necessary to comply with legal requirements and our obligations as a Manufacturing Company & Employer. GDPR requirements are explained below:

1. As your employer, the Company needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately.

We will keep and use the information during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings.

If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

2. As a Manufacturing company we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes.

The nature of our legitimate interests is legal compliance, in relation to tax requirements, immigration and right to work requirements and all other relevant legal requirements. We hold personal details that allow us to pay you and details relevant to health & safety and training.

We will never process your data where these interests are overridden by your own interests.

3. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees.

4. The sort of information we hold includes your application form and references, proof of identity (ID Card, Passport, Birth and/ or Marriage certificates), hand print biometric data for clocking in and out of work, your contract of employment and any amendments to it; correspondence with or about you, for example letters to you about pay or, at your request, a letter to your mortgage company confirming your salary; information needed for payroll, benefits and expenses purposes (such as bank details, pension deductions, hospital fund deductions and court order details); contact and emergency contact details; records of holiday, sickness and other absences; and records relating to your career history, such as training records, any appraisals or other performance measures and, where appropriate, disciplinary and grievance records.

5. You will, of course, inevitably be referred to in many company documents and records that are produced by you and your colleagues in the course of carrying out your duties and

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the business of the company.

These are retained for compliance purposes.

6. Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay, health insurance or life insurance policies.

7. We do not use automated decision making or profiling.

We do not currently process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, or sexual orientation.

We would always obtain your explicit consent if undertaking those activities unless this is not required by law or the information is required to protect your health in an emergency.

Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

Your information will not be transferred outside of the EEA or to any international organisation.

8. In addition, we monitor company computer use in relation to websites viewed and email addresses used and company mobile telephone use, by reviewing the itemised bills. We also keep records of your hours of work by way of our clocking on and off system which uses handprint biometric data.

We monitor the premises with CCTV cameras and retain data from this for 1 month.

This data can be used for investigation of security, Health & Safety and conduct issues.

9. Other than as mentioned below, we will only disclose information about you to third parties if

we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to Earnie, our external payroll provider as well as pension or health insurance schemes.

10. Your personal data (including training records) will be stored for a period of your time of employment + 7 years.

Pay Roll data is kept for 7 years.

Health & Safety Data such as accident records will be retained for 7 years in order to understand trends and map improvements against targets and history.

11. If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

12. All personal data we store relating to you is kept in secured cupboards and/or secure protected servers. Any business partners such as Insurers, our Payroll Company and Occupational Health providers are also obliged to retain data in a secure way.

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If we suffer any breach of security that may involve your personal data we will inform you of this and the actions being taken to address the issue.

Your Rights.

13. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

14. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

15. If you wish to make any of the requests outlined above you should do so in writing to Pam Mawson (contact details below). You will get a response within 30 days of receipt of your email/letter.

If the number and/or complexity of the requests are such that they cannot be fully actioned in this time you will be advised of the further period needed to complete the action which shall be no more than a further 2 months.

16. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 2018 with regard to your personal data. Contact details are: <https://ico.org.uk/concerns/> Helpline on 0303 123 1113.

17. Pam Mawson is the controller [and processor] of data and data protection officer for the purposes of the DPA 2018 and GDPR.

18. If you have any concerns as to how your data is processed you can contact:

Pam Mawson at: pam.mawson@wrapid.co.uk

If you have any remaining concerns you can contact Steve York, Joint managing Director at steve.york@wrapid.co.uk

or you can write to these individuals using the address of:

Wrapid Manufacturing Ltd
250 Thornton Road
Bradford BD1 2LB

WRAPID MANUFACTURING STAFF GENERAL INDUCTION PACK

Appendix 3 IT Acceptable Use Policy

1. Introduction

This Acceptable Use Policy (AUP) for IT Systems is designed to protect Wrapid, our employees, customers and other partners from harm caused by the misuse of our IT systems and our data. Misuse includes both deliberate and inadvertent actions.

The repercussions of misuse of our systems can be severe. Potential damage includes, but is not limited to, malware infection (e.g. computer viruses), legal and financial penalties for data leakage, and lost productivity resulting from network downtime.

Everyone who works at Wrapid is responsible for the security of our IT systems and the data on them. As such, all employees must ensure they adhere to the guidelines in this policy at all times. Should any employee be unclear on the policy or how it impacts their role they should speak to their manager or IT.

2. Definitions

“Users” are everyone who has access to any of Wrapid’s IT systems. This includes permanent employees and also temporary employees, contractors, agency staff, consultants, and business partners.

“Systems” means all IT equipment that connects to the corporate network or access corporate applications. This includes, but is not limited to, desktop computers, laptops, smartphones, tablets, printers, data and voice networks, networked devices, software, electronically-stored data, portable data storage devices, third party networking services, telephone handsets and all other similar items commonly understood to be covered by this term.

3. Use of IT Systems

All data stored on Wrapid’s systems is the property of Wrapid. Users should be aware that the company cannot 100% guarantee the confidentiality of information stored on any Wrapid system except where required to do so by local laws.

Wrapid can monitor the use of its IT systems and the data on it at any time. This may include (except where precluded by local privacy laws) examination of the content stored within the email and data files of any user, examination of the access history of any users and also CCTV footage.

Wrapid reserves the right to regularly audit networks and systems to ensure compliance with this policy.

4. Data Security

If data on Wrapid’s systems is classified as confidential users must take all necessary steps to prevent unauthorized access to safeguard the confidential information.

Users are expected to exercise reasonable personal judgement when deciding which information is confidential.

Users must not send, upload, remove on portable media or otherwise transfer to a non-Wrapid system any information that is designated as confidential, or that they should reasonably regard as being confidential to Wrapid, except where explicitly authorized to do so in the performance of their regular duties.

Users who are supplied with computer equipment by Wrapid are responsible for the safety and care of that equipment, and the security of software and data stored on it and on other Wrapid systems that they can access remotely using it.

Because information on portable devices, such as laptops, tablets and smartphones, is especially vulnerable, special care should be exercised with these devices. Users will be held

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responsible for the consequences of theft of or disclosure of information on portable systems entrusted to their care if they have not taken reasonable precautions to secure it.

All workstations (desktops and laptops) should be manually locked by the responsible user whenever leaving the machine unattended for long periods of time. (Pressing the Windows Key and L at the same time achieves this instantly)

Users must at all times guard against the risk of malware (e.g., viruses, spyware, Trojan horses, rootkits, worms, backdoors) being imported into Wrapid's systems by whatever means and must report any actual or suspected malware infection to IT immediately.

5. Unacceptable Use

All employees should use their own judgment regarding what is unacceptable use of Wrapid's systems. The activities below are provided as examples of unacceptable use, however it is not exhaustive. Should an employee need to contravene these guidelines in order to perform their role, they should consult with and obtain approval from their manager before proceeding.

- All illegal activities. These include theft, computer hacking, malware distribution, contravening copyrights and patents, and using illegal or unlicensed software or services. These also include activities that contravene data protection regulations.
- All activities detrimental to the success of Wrapid. These include sharing sensitive information outside the company, such as research and development information and customer lists, as well as defamation of the company.
- All activities for personal benefit only that have a negative impact on the day-to-day functioning of the business. These include activities that slow down the computer network (e.g., streaming video, playing networked video games).
- All activities that are inappropriate for Wrapid to be associated with and/or are detrimental to the company's reputation. This includes posts on social media websites such as Facebook/Twitter etc., pornography, gambling, inciting hate, bullying and harassment.
- Circumventing the IT security systems and protocols which Wrapid has put in place.
- Employee personal Mobile phones should not be charged via a USB lead connected to a PC and files from the Mobile phone should not be transferred to a PC as this poses a potential risk of virus infection.

6. Enforcement

Wrapid will not tolerate any misuse of its systems and will discipline anyone found to have contravened the policy, including not exercising reasonable judgment regarding acceptable use. While each situation will be judged on a case-by-case basis, employees should be aware that consequences may include the termination of their employment.

Use of any of Wrapid's resources for any illegal activity will usually be grounds for summary dismissal, and Wrapid will not hesitate to cooperate with any criminal investigation and prosecution that may result from such activity.