



**DS SMITH PLC**

**HEAT STRESS AND HEAT DISCOMFORT PROTOCOL**

**Background:**

For some time the DS Smith EWC has been raising concerns with DS Smith Senior Management around workforce health, safety and general well-being arising from exposure to an excessively hot working environment. This has been, to date, labelled "heat stress".

During the 2017 EWC plenary meeting this topic was raised with the Group H&S Director who confirmed that there was little or no empirical data to validate the concerns being raised.

This protocol sets out the joint understanding of the DS Smith EWC and DS Smith Senior Management on the issues relating to heat stress.

**Definitions:**

**Heat Stress:** The medical state that occurs when the human body's ability to control its internal temperature starts to fail because of its exposure to heat.

**Heat Discomfort:** The psychological state of being or feeling uncomfortable as a result of an excessively hot environment at work.

**Excessive:** Excessive is defined as "a level which is reasonably recognised as being harmful to health". This may be determined by local legislation and local arrangements should be adjusted accordingly.

**Action Plan:**

Both the DS Smith EWC and DS Smith Senior Management recognise that psychological and physiological harm can be caused through the exposure to an excessively hot work environment, however it is caused.

**Risk Assessment**

All sites are required to conduct a formal risk assessment to consider the health risks created by the working environment looking at both hot and (where appropriate) cold working environments.

**Control Measures**

All sites are required to take necessary action to reduce, mitigate or eliminate the risks of serious harm (as identified by risk assessment) arising from excessively hot (or cold) working environments. Sites are required to seek the advice of a competent person and / or expert in appropriate circumstances. Where such risks can reasonably be eliminated (as opposed to merely reduced), DS Smith will take all necessary action to eliminate them; and where such risks can only reasonably be reduced as opposed to eliminated, DS Smith will take all necessary action to reduce those risks.

### **Information & Training**

All sites are required to provide information and training to all employees who are at risk from the health effects associated with excessively hot or cold working environments.

### **Requisite expertise**

There are a number of situations where local site management might require additional expertise to 1) understand issues arising from heat stress, heat discomfort and cold temperatures, 2) decide upon appropriate and necessary action and; 3) implement such action (for example, recognising "excessive" heat pursuant to the definition of "excessive", conducting "formal risk assessments", taking appropriate "control measures" etc). Sites are required to secure such expertise as is necessary to support them in addressing issues under this Protocol.

### **Complaints**

Any complaint, whether by an individual employee or through an employee representative or representative organisation, should be made to the local site management and such complaint will be treated seriously and quickly, and in any event within 7 days of the complaint being raised.

Where the complaint relates to heat stress and a real and imminent risk to health is believed to exist then an immediate response is required.

Any failure to provide an adequate response at a local level will be managed through the escalation process set out below.

### **Escalation Process for Specific Sites of Concern:**

If the DS Smith EWC believes that there are specific issues at specific sites, and the local response (as detailed in Complaints) has been deemed inadequate - then the following process will be followed.

- |             |   |
|-------------|---|
| First step  | DS Smith EWC / Employee Representatives raises formal concerns about a specific site. Local HR, H&S and General Manager to investigate and respond within 48 hours.                           |
| Second step | If the issue / concern remains open after 48 hours then escalation to country/regional level with HR, H&S, Operations and Divisional EWC Chairman responsible for the review.                 |
| Final Step: | Once steps 1 and 2 are concluded, if the issue remains open then a Site Visit or detailed review (depending on circumstances) by the Group HS Director and the EWC Chairman will be arranged. |

**Site Visits:**

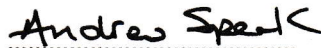
Where specific concerns are raised over either a substantial risk to health, safety and well-being or a specific management failure to comply with this protocol then site visits will be arranged, at the earliest practical opportunity, between the EWC Chairman's Group and the Group HS Director. Relevant issues about specific sites should always be managed via the complaints and then, escalation process.

**Signatures**

Signed, with an effective date of July 10 2018,

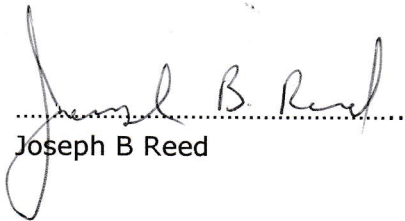


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Group CEO  
For and on behalf of D S Smith

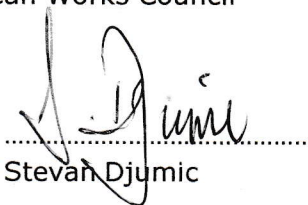


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Group H R Director  
For and on behalf of D S Smith

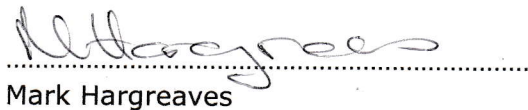
Signed by the Chairs Group of the D S Smith plc European Works Council



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Joseph B Reed



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Stevan Djumic



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Mark Hargreaves



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Simon Barrowclough

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