

#### **Policy Statement**

SCCS Survey Equipment Ltd is committed to undertaking its business operations (as a value-added supplier) in a manner which consistently:

- 1. Complies with all relevant Health & Safety Legislation
- 2. Maintains the integrity of products supplied
- 3. Favours sustainable procurement practices
- 4. Develops close/ collaborative relationships with identified key suppliers
- 5. Drives down cost without compromising quality and safety of the products supplied to its customers

#### **Policy Aim & Commitments**

#### **Company Commitments**

- 1. The Company shall ensure new products supplied for sale or hire will be safe and without defect as far as reasonably practicable.
- 2. The Company shall ensure reconditioned products supplied for sale or hire will be supplied in the same condition (in relation to its safety) as when the product was originally placed on the market for first purchase/ use, as far as reasonably practicable. This shall mean that all health & safety features are present and fully functional.
- 3. The Company shall ensure items returned from repair & servicing will be checked to ensure the retained integrity (safety) of the product before its return.
- 4. The Company will make available manufacturer information which may include the following:
  - 4.i Technical Specification Information
  - 4.ii Certifications (such as Certificate of Conformity, UKCA, UKNI)
  - 4.iii Manufacturer guidance on correct/safe use and recommendations for upkeep through the lifecycle of the product.
- 5. The Company shall ensure equipment, tooling and similar procured for use by its personnel (or any agent acting on its behalf) shall be (when making procurement selections):
  - Suitable for the intended use
  - Safe for use (meets required legislative and industry safety standards) and is supplied with suitable safety marking/certifications/technical product information and safety data.

#### **Policy Aims**

- 1. Provide a structured framework from which to operate its procurement practices
- 2. To provide maximum value for our customers whilst maintaining integrity & safety
- 3. Only procure equipment, tooling and similar for its personnel in accordance with the remit of this policy

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#### Scope

This policy applies to:

1. The Company's procurement practices.

2. The Supply of product to our customers, whether that be for purchase (new or reconditioned), hire, service, repair or FOC sample.

#### **Definitions**

- 1. "Company" shall mean SCCS
- 2. "HSWA74" shall mean The Health & Safety at Work Act 1974
- 3. "Management Team" shall generally refer to senior management such as the Managing Director and Operations Director (and such other senior personnel deemed appropriate)
- 4. "PPE" Personal Protective Equipment

#### 1. Relevant legislation and standards

- Health & Safety at Work Act 1974 (section 6)
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Aerosol dispensers Regulations 2009
- Measuring Instruments Regulations 2016
- Noise Emission in the Environment by Equipment for use Outdoors Regulations 2001
- Radio Equipment Regulations 2017
- Regulation (EU) 2016/425 and the Personal Protective Equipment (Enforcement) Regulations 2018
- Supply of Machinery (Safety) Regulations 2008
- General Product Safety Regulations 2005
- Construction Products (Amendment etc.) (EU Exit) Regulations 2019
- Construction Products (Amendment etc.) (EU Exit) Regulations 2020
- Network Rail standard NR/L2/OHS/00120 as may be amended and other applicable client infrastructure requirements

#### 2. Responsibilities

#### General

- For the purpose of this policy the Company defines its activities as a value-added supplier of surveying goods and services
- The Company does not design or manufacture goods.
- The Company operates associated relevant procurement practices/policies which include: Sustainable & Responsible Procurement, Ethical Trading, Code of Business Conduct, Supplier Code of Conduct.

#### Specific

- Management has overall responsibility for the operation of Company procurement policies
- Day to day management of Company procurement processes have been delegated to a Procurement and Goods in teams.
- Procurement requirements will either be determined by:

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Specific customer order requirements

- Rolling re-stock or products (available for customer purchase)
- Company operational requirements such as tooling, equipment, safety and general welfare requirements
- Rolling re-stock of products for hire fleet
- Where appropriate authorisation to purchase is fed down to the Procurement team by authorised personnel (Management, line managers, HR business partner and H&S Manager)
- The Goods In Team have responsibility for booking in checks as set out in this policy
- The Procurement Team, in conjunction with Credit Control have day to day responsibility for Supplier selection.

#### 3. Supplier Selection/On-boarding and audit

#### **General**

- 3.1 The Company is a value-added supplier of surveying equipment. The nature of the industry in which the Company operates pre-determines some purchasing decision based on specific customer requirements which may only be sourced from specific suppliers.
- 3.2 The Company is an authorised distributor (and in some cases service partner) of the following specific products ranges:
  - Leica Geosystems
  - Amberg Technologies
  - Radiodetection
  - Nedo
  - BMI
- 3.3 The Company defines its **Key Suppliers** as those suppliers (whose supplies are) vital to the Company in order to fulfil customer requirements in accordance with its business objectives.
- 3.4 The Company defines its **Ancillary Suppliers** as those supplies (whose supplies are) important to the Company for fulfilment of its business objectives but do not necessarily form the primary part of the Company's core range of products. Typically, these might be products that could be procured from more than one potential source.
- The Company defines its **Key Ancillary Suppliers** as those supplies or services which are of (significant) importance to the Company but could be available from multiple sources. Typically, this could be providers of PPE, specific services such as safety advice and required subscriptions such as safety subscriptions, providers of occupational health services & testing.
- 3.6 The Company is committed to securing close collaborative working relationships with appropriately selected suppliers.
- 3.7 The Company use an informal supplier selection process suitable to its operational needs. The Company will continue to review the format and extent of this process based on operational need, legislative needs, client and infrastructure needs.

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#### Supplier selection criteria

3.8 Wherever supplier selection has not been pre-determined for reasons set out above the following criteria will be adopted when selecting new suppliers (for use):

- **Stability.** The length of time a business appears to have been in operation and an indication of the financial stability of that proposed supplier.
- Reliability. Will the potential supplier have items in stock. What are the likely lead time for stock? Are any references or other customer feedback available for the proposed supplier?
- **Cost.** Is the price competitive?
- Location. Sourcing locally will reduce environmental impact and reduce lead times for delivery. It will also encourage business within a local community context.
- Quality. Are goods legitimate and not counterfeit. Goods that are too good to be true may not be legitimate items. Can the quality of the stock be assessed in advance of selection? An example might be customer feedback ratings or FOC samples for evaluation.
- Ethical Practices. The Company favours suppliers who can demonstrate operating in a matter that is compliant with the principles of diversity, legal compliance, safety compliance, fairness and transparency within its operations. A typical example might be the presence of supplier policies on their own website.
- Sustainable & Responsible Procurement Practices. The Company favours suppliers who are able to demonstrate practices in line with the Company.
- Quality Control or other relevant accreditations. The Company favours suppliers who hold quality and similar accreditations as these will tend to be a strong indicator of the manner in which the supplier operates. Additionally, accreditations tend to be subject to auditing by external bodies.

#### **Supply Chain Audit**

- 3.9 The Company will sample audit suppliers within its Supply chain at appropriate interval (generally annually).
- 3.10 Audit will generally be achieved by completion of supplier questionnaire. The aim of the questionnaire will be to assess the ongoing ability of the supplier to operate to required compliance standards (safety legislation, other relevant business legislation and recognised best practices).
- 3.11 The assessment of supplier responses shall be undertaken by competent personnel with sufficient compliance knowledge and understanding to conduct a meaningful audit.
- Assessed deficiencies, following audit, will be suitably followed up and resolved. The 3.12 Company aims to work with its supply chain to achieve best practice rather than penalise suppliers who may have appropriate practices but perhaps have not formalised those practices due to the size of its operations.
- 3.13 The Company has a Supplier Code of Conduct setting out the expectations of the Company within its dealings with Suppliers. This code requires signature by the supplier to signal their agreement to work within the parameters set out by the Company.
- 3.14 The Procurement Team shall be responsible for the (informal) day to day ongoing assessment of the performance of Company suppliers against selection criteria and compliance requirements.

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3.15 The details of suppliers shall be held on the Company ordering system and details held in accordance with all GDPR data protection requirements (as set out in Company policies).

- 3.16 The details of supplier (key) contacts may also be in other applications stored securely for the purpose of supply chain audit and held in accordance with GDPR data protection requirements.
- 3.17 Where suppliers are no longer able to demonstrate their ability to meet Company requirements the use of that supplier will be noted on the audit database as pending or suspended (depending on circumstance) and the details of the change of status notified within the Procurement Team. If the supplier is able to take suitable steps to resolve any identified issues their status will be amended back to approved status and the status notified within the Procurement Team.
- 3.18 The Company considers the compliance of its Suppliers to the requirements of its Supplier Code of Conduct to be imperative to its business objectives.

#### Gifts and Hospitality

- 3.19 The Company will not be prejudiced by, or make supplier selections based upon, the receipt or offer of gifts, hospitality or other related acts which may been understood by a casual observer to influence the decision-making process.
- 3.20 The Company maintains a robust Anti-Bribery Policy
- 3.21 Selection decisions will only be based upon relevant compliance criteria as referred to within this policy.

#### 4. Procurement of goods and services

- 4.1 The Company has a dedicated Procurement Team with responsibility for procurement on behalf of the Company.
- 4.2 SCCS personnel are required to submit their purchasing requirements to the Procurement Team for processing. All procurement requires a purchase order (with a unique purchase order number) to be raised. Purchase orders are generated on the Company order processing/ order procurement software operating system.
- 4.3 The procurement team have control over purchasing decisions, but this is overseen by Management and may involve the prior approval of certain items for procurement (in advance). An example might be the prior approval by management for procurement of rolling hire stock.
- 4.4 Purchase orders are placed with prior approved suppliers but where that is not possible a new supplier may be sourced in accordance with the principles set out in this policy. The team will satisfy themselves that the proposed new supplier is able to rate highly compared to those criteria before first use.
- 4.5 Each order will be placed by sending a purchase order to the supplier. The purchase order will have a unique identifiable purchase order number generated by the Company operational system.
- 4.6 The purchase order will be noted (on the Company operational system), *as appropriate*, with suitable details such as:

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- Person requesting order
- Intended recipient of goods (Company internal orders or stock orders)
- Customer details including delivery note number (for customer orders)
- Known lead times for supply (as advised by the supplier)
- Where a supply will be made directly to a customer this will be noted
- 4.7 The Purchasing Team will informally monitor progress against open purchase orders, including, as appropriate, chasing overdue stock (revised lead time) or missing lead time information.
- 4.8 Goods received are booked in following goods in procedures. Relevant delivery receipt paperwork is passed to the Procurement Team to close out the order.
- 4.9 Shortfalls and other identify problems are notified to the Procurement team for rectification.

#### 5. Receipt (and despatch) of procured goods

#### Receipt

- 5.1 Supplies are received into the Company with delivery paperwork.
- 5.2 Goods are checked against the received paperwork and the referenced Company purchase order.
- 5.3 Each delivery is checked to ensure it is received free from obvious signs of damage or defect.
- 5.4 Each delivery is checked to ensure it is received in the condition stated on delivery paperwork (quantities and type).
- 5.5 Each delivery is cross references to Company purchase order to ascertain whether those goods are for stock, customer order fulfilment or specific Company end user.
- 5.6 Delivery deficiencies (quantity and type) are notified to the Procurement Team for rectification.
- Where any product is received and deemed to have an inherent risk to health & safety it will segregated and tagged pending resolution. The tag will contain information recording its associated purchase order, date of receipt to premises and brief description of defect. If the goods are re-packed and returned to the supplier <u>immediately</u> the tagging system will not be required. Safety checks will generally include (as appropriate):
  - Signs of cracked casing or outer covering or product
  - Exposed hazards such as sharp unprotected edges
  - Signed of electrical cabling being split or damaged
  - · Signs of wear and tear suggesting product not supplied as new
  - Lose handles/handle covers on tools
  - Signs of discoloration on electrical products
  - Other obvious signs of damage

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Section 6 of the Health & Safety at Work Act 1974 imposes a duty on all persons within the supply chain. Responsibilities include:

- Supplied goods are safe and without risk to health at all times when used, cleaned or maintained
- Supplied products will have received necessary testing & examination to ensure it is safe
- Goods will be supplied with information regarding the safe use, cleaning, maintenance, dismantling and disposal of the item (whole lifecycle)
- 5.8 Goods received will be checked to see if expected accompanying documentation is present (such as legal certifications, safety data, technical data). Where any doubt exists regarding compliance with legal requirements this will be flagged with the Procurement Team for investigation with the supplier. The supplier must be able to satisfy the Company that it has met all currently relevant legal standards. This is particularly the case during the transitional (post Brexit) period and when new UK legislation comes into full force.
- 5.9 Products received into the Company shall be received as set out above and, upon checking, the checker will sign off (to confirm result of checking process) before passing the paperwork to the Procurement Team. The received stock is booked into the Company stock operating system by the Goods In team (quantities updated against product SKU numbers).
- 5.10 Notifications of stock received will be sent via email to appropriate Company Teams to notify them of the arrival of stock (which may be required for customer order fulfilment).

#### Despatch

- 5.11 Depending on the nature of the equipment received (and later picked for order fulfilment) the product(s) will undergo suitable testing in accordance with Company Operational Procedures, Company Policies, applicable legislation requirements and Company practices (such as checking hire kit before re-hiring).
- 5.12 Goods received for order fulfilment will require a pick instruction to be sent to the relevant Picking Team. This will typically be a copy of the delivery note with quantities required to be picked and its location within the warehouse.
- 5.13 On receipt of a pick request the Picking Team will proceed with the pick and notify the result to relevant personnel including details of any stock deficient (which will be required to be ordered in to fulfil that order). If the order is deemed ready for a part of full delivery the appropriate personnel will print off two copies of delivery paperwork to the warehouse. One copy for the customer to retain and one copy for the Company. Each copy will be noted with the details of the picker and the person double checking the picked quantities. The Company copy of the delivery note will be used to either note a tracking reference for goods sent by external delivery services or used by Company driver to obtain a proof of delivery signature from the customer.

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5.14 During the picking process the picking team will check that goods still retain their relevant safety marking and any accompanying product/safety/technical/legal compliance documentation. Checks will be made to ensure products are sent with any required Supplier details (name and address) which may be required for supply following the end of Brexit transitional arrangements.

- 5.15 Where delivery is made by Company driver the driver will sign the delivery paperwork after making delivery. Any problems are notified on the delivery paperwork by the driver. The driver will also secure the signature of the recipient of the goods delivered.
- 5.16 All Company delivery drivers scan a copy of delivery paperwork before passing the hard copy to the appropriate team for processing (and invoicing).
- SCCS retain drivers for the delivery of customer orders, FORS deliveries are delivered by 5.17 SCCS FORS trained/accredited driving personnel.
- From time-to-time, due to location or for expediency reasons, FORS deliveries may be 5.18 made by the Company preferred courier company who also retain FORS accreditation. It is a requirement of the Company that any delivery company used for FORS delivery shall be accredited to a minimum of Silver level.

#### 6. Supply (legal) Compliance Requirements

- 6.1 Following Brexit, the UK government plans to implement its own (legal) safety marking arrangements. The current transitional date/time is set for 11pm on the 31<sup>st</sup> December 2024.
- 6.2 At the present time the UK is in a transition period whereby it is possible to continue to rely on EU CE marking as well as the proposed UK UKCA and UKNI marking as appropriate. The full details of the transition may be subject to further changes before full implementation and so the status of requirements is set out in Schedule 1 attached to this policy.
- 6.3 Relevant personnel are required to keep themselves up to date with current requirements in case of further changes to implementation dates and requirements. Resources will be set out in Schedule 1.
- Goods lawfully marked with the CE mark and placed on the EU market before the end of 6.4 the transition period can continue to circulate until they reach their end user, whether they are in the UK or the EU. This means goods are covered by a harmonised EU standard, are affixed with CE marking and are accompanied by a manufacturers declaration of performance and have been assessed by an EU recognised notified body. After transition the UKCA marking will NOT be recognised on the EU market. Products supplied to the EU will continue to require a CE marking for sale in the EU. The UK Government intend to end its recognition of CE marking within GB market on the 30<sup>th</sup> June 2025. All declaration of conformity issued must accompany the product through the supply chain to the end user.
- Where a product is sourced which is not CE marked the first importer of that product 6.5 takes on the duties of the manufacturer (for the purpose of discharging all legal duties).
- 6.6 During the transitional period it is possible, as appropriate, to apply the UKCA (or UKNI marking for goods from Northern Ireland) where goods have met the requirements of those assessment requirements. Goods may only receive that marking if they have received assessment by a UK government approved assessment body. The list of approved assessors is available from the UK Government website.

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Wherever goods are held by the Company before then end of the transitional period but not actually supplied to an end user they will not be required to comply with UKCA (or UKNI) if it can be clearly demonstrated those goods were procured (for supply to end user) before the end of the transition period.

- 6.8 UKCA and UKNI marking is subject to exact sizing and re-sizing requirements.
- 6.9 Some construction products will not be covered by UKCA/UKNI requirements and will be covered by alternate rules.

#### 7. Monitoring & Review

- 7.1 Management shall have overall responsibility for implementation of all appropriate purchasing and supply chain management policy implementation (via top-down endorsement) including this policy.
- 7.2 Management will have overall responsibility for the review and further implementation of such additional processes that may be necessary to meet the changing needs of its customers & business partners as well as requirements for the maintenance of Company accreditations
- 7.3 Management shall have overall responsibility for the review of its own supply chain needs, necessary to meet it operational objectives (but may delegate as deem appropriate)
- 7.4 The Management team shall have overall responsibility for overseeing the monitoring of supply chain performance but will usually delegate this to appropriate personnel as set out above. The results of monitoring/auditing shall be reviewed, as appropriate.
- 7.5 The Purchasing Team shall have responsibility for the development of collaborative relationships with its suppliers, this will include suitable resolution of identified short falls within performance and the escalation (and suitable suspension of supplier) of continued or unresolved shortfalls via Management (who may delegate to suitably competent personnel for final resolution).
- 7.6 This policy shall be reviewed a minimum of annually (and as otherwise required).

Print name: Kevin Smith

Position: Managing Director

Revision 12

Print name: Kevin Smith

Date: 24<sup>th</sup> January 2023

Next review: 24<sup>th</sup> January 2024

# PROCUREMENT & SUPPLY CHAIN MANAGEMENT POLICY SCHEDULE 1: PRODUCT SAFETY MARKING

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Products covered by the requirement to apply UKCA marking can be found here:
 <a href="https://www.gov.uk/guidance/using-the-ukca-marking#product-areas-covered-by-the-ukca-marking">https://www.gov.uk/guidance/using-the-ukca-marking#product-areas-covered-by-the-ukca-marking</a>
 The Company have initially assessed the following products (supplied by the Company) will be subject to the requirements of UKCA marking:

- o Measuring instruments
- o Radio equipment
- Personal Protective Equipment (PPE)
- Machinery
- Equipment for use outdoors
- Aerosols
- o Low voltage electrical equipment
- UKCA marking cannot be used for products placed on the Northern Ireland market. At the current time European harmonised standards remain the relevant standards for placing goods on the Northern Ireland market, where there is alignment with relevant EU rules.
- The UKCA marking is NOT recognised on the EU market. Products needs a CE marking for sale in the EU.
- Some products are covered by UKCA marking but have special rules. There is specific guidance available for the following products:
  - o Construction products
  - o Rail interoperability
  - Energy using products
  - Hazardous substances (RoHS)

Further advice regarding applicable regulations to products can be viewed here: https://www.gov.uk/guidance/product-safety-for-businesses-a-to-z-of-industry-guidance

- The UKCA marking must be placed on a label affixed to the product or on a document accompanying the product until 11pm on 31<sup>st</sup> December 2027 (please refer to separate Govt advice regarding products falling under the "Construction Products" requirements).
- The UKCA mark applies to the product or its packaging. It must be clearly visible, legible and indelible when affixed. It may sometimes be placed on manuals or other supporting literature depending on specific regulations that apply to that product. These rules are currently the same as affixing CE marking. When affixing UKCA marking YOU take full responsibility for conformity with the requirements of relevant UK legislation. You must not place any marking/signature or inscription which is likely to mislead any other as to the meaning or form of the UKCA marking or affix any marking which would impair the visibility, legibility and meaning of the UKCA marking. Both the CE and UKCA marking can be placed on a product so long as neither prevents the other being clearly seen and the requirements of both GB and EU legislation are met.
- Batch goods do not require each individual component to be marked but if the Company wishes to break up the batch then each would need the appropriate accompanying documentation. The same principles continue to apply to all units as they move through the supply chain to its end user.
- The UKCA mark is at least 5mm in height (unless otherwise stated under separate rules). Resizing must be do proportionately.
- UK approved bodies (approved to assess goods for UKCA) marking can be viewed here:
   <a href="https://www.gov.uk/guidance/construction-products-regulation-in-great-britain#annex-a-uk-approved-bodies">https://www.gov.uk/guidance/construction-products-regulation-in-great-britain#annex-a-uk-approved-bodies</a>
   Assessment by any other body is NOT acceptable.

## PROCUREMENT & SUPPLY CHAIN MANAGEMENT POLICY SCHEDULE 1: PRODUCT SAFETY MARKING

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A summary of currently acceptable markings appears below:

#### **General**

Placing goods on the market in GB	Accepted marking or combination of markings
Manufactured products being placed on the GB market until 11pm on 31 <sup>st</sup> December 2024	UKCA or CE
Manufactured products placed on the GB market from 11pm on 31 <sup>st</sup> December 2024	UKA
Placing qualifying Northern Ireland goods on the market in GB (unfettered access)	CE or CE and UKNI

NB. Goods will be subject to Importer labelling as set out below

#### Supply of goods to Northern Ireland

You must continue to meet the requirements as though supplying to the EU but also UKNI requirements. You cannot use UKNI marking if the ultimate intention is to for goods to be placed on the market in the EU

#### **Construction Products (supply in GB)**

Supplying goods (which are not qualifying Norther Ireland goods) to the market in Great Britain	Accepted marking or combination of markings
Construction product supplied to the GB market until 30 <sup>th</sup> June 2025	UKCA or CE or CE & UKNI
Construction product supplied to the GB market from 30 <sup>th</sup> June 2025	UKCA
Supplying qualifying Northern Ireland goods to the market in Great Britain (unfettered access*)	Accepted marking or combination of markings**
Construction product which is a qualifying Northern Ireland goods being supplied to the GB market under unfettered access provisions from 30 <sup>th</sup> June 2025	CE or CE & UKNI

<sup>\*</sup> Goods which start their journey in the EU and then come to Great Britain via Northern Ireland will NOT qualify for unfettered access.

NB. Goods will be subject to Importer labelling as set out below

#### Supply of goods to the EU market

The EU continue to recognise the EU marking (declaration of conformity) process only.

Required content for any Declaration of Conformity:

- State the name and address of the manufacturer and, where appropriate, the name and address of their authorised representative
- Contain a description of the product, its make and serial number
- Indicate all European laws (directives) with which the product complies
- List the details of any notified body involved in the process

<sup>\*\*</sup>You may use combinations of the product markings listed in each box and your goods may be acceptable with more than one marking.

#### **PROCUREMENT & SUPPLY CHAIN** MANAGEMENT POLICY SCHEDULE 1: PRODUCT SAFETY MARKING

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- Specify which standards have been used in the manufacture (if any)
- State the place and date of the declaration
- Be signed by a person with authority to do so

Checklist for safe supply (to the EU market) should include (but not be limited to):

- Check for obvious signs of damage and/or defect
- Check that known product risks are suitably controlled or that the product is supplied with information on how to control known inherent risks
- Check for the inclusion of instructions from the manufacturer to include the safe installation, use, adjustment and maintenance
- Ensure any warning signs are clearly visible and easy to understand
- Check for a properly completed Declaration of Conformity and CE marking

#### Importer labelling

An "Importer" is the first person to place goods on the market within GB, from outside the UK.

Goods placed into circulation in GB require Importer labelling. Until 31st December 2025 these goods may be provided on packaging or in an accompanying document. After 31st December 2025 the Importer details must be affixed directly on the product.

Importer details must include a name and address.

Signed: Print name: Kevin Smith 24<sup>th</sup> January 2023 Position: **Managing Director** Date: 24<sup>th</sup> January 2024 Revision 12 **Next review:**