



HEALTH, SAFETY & ENVIRONMENT MANAGEMENT SYSTEM (HSEMS)

Document Revision Table

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Introduction

Zip World HSE Management System defines the principles by which we conduct our operations with regards to health, safety, and the environment. All management are responsible for communicating the HSE philosophy to all employees, customers, contractors, and third parties associated with our business, and each of Zip World's sites (including, but not restricted to, Penrhyn Quarry, BYC, Llechwedd, Tower, London, Manchester, Windermere, Cardiff, TYC and Base Camp) must provide positive evidence of conformance to the system in its day-to-day business.

The HSE Management System model comprises seven interrelated components:

1. Management Leadership and Commitment
2. Policy and Strategic Objectives
3. Organisation, Responsibilities, Resources, Standards and Documentation Hazards and Effects Management
4. Planning and Procedures
5. Implementation and Performance Monitoring
6. Audit
7. Review.

These are continuously improved by conformance checks on day-to-day standards and procedures (controls) on the management system (correction) through modifications to the management system (improvement).

The Chief Executive Officer's message

Foreword by Andrew Hudson CEO of Zip World

Zip World is committed to maintaining safe working practices across all areas of the organisation. Health, Safety and Environment (HSE) is fundamental to how we operate and is integral to:

- Delivering high-quality work
- Supporting good and responsible business practice
- Meeting and exceeding client expectations
- Complying with the conditions of employment and contractual obligations

As CEO of Zip World, I expect full commitment, personal responsibility, and accountability from all employees and contractors. All operations must comply with Zip World HSE policies, procedures, standards, and guidelines as a routine part of day-to-day activities. There are no exceptions.

We are committed to fostering a proactive, safety-conscious culture throughout the organisation, led from the top down. Every employee has a responsibility to promote, support, and uphold safe working practices, and to actively lead, influence, and monitor performance within their areas of responsibility.

Our commitment to safety is demonstrated and measured through a range of processes and controls. The Zip World Health and Safety Management System (HSE-MS) defines our approach and sets out how we plan, manage, and carry out our operations safely. Our reputation and continued

success depend on conducting our business in the safest possible manner — the first time, every time.

Zip World Integrated Safety Management Statement

Zip World is an adventure tourism company. The Executive team are committed to ensuring that all company operations are delivered in an efficient, safe, and environmentally sound manner. This includes the provision of safe and healthy working conditions and the protection of the environment.

We aim to meet or, where practical, exceed all relevant legislative and compliance obligations and minimise the effect of our operations on the environment. We are committed to continual improvement in all aspects of our operations, achieving this through the setting of quality, environmental and health and safety objectives which are reviewed on an annual basis.

Excellence in safety, health and environmental performance is our top priority to be achieved through a positive safety culture in which we believe all incidents are preventable. We recognise the active employee and contractors' involvement is critical to achieving our quality, safety, health, and environmental objectives.

The specific aims of our policies are to:

1. Implement and maintain a comprehensive quality, environmental, health and safety management system which forms an integrated part of our existing organisational culture of commitment to continuous improvement.
2. Ensure that our facilities have as low an impact as possible on local people and the environment by working in close partnership with the community and other stakeholders to ensure we are a responsible neighbour.
3. Provide appropriate training to our employees and sub-contractors to enable them to work within and contribute to our policy commitments.
4. Promote our commitment to providing a quality service in a safe and environmentally responsible manner to our customers, employees, contractors, and suppliers by making this policy available to all stakeholders.

This policy will be subject to regular review.

Andrew Hudson
Chief Executive Officer

HSE Management System - At a glance:



1. Management, Leadership, Commitment and Accountability

1.1 Management, Leadership and Commitment

The Zip World Executive team shall establish policy, provide perspective, sets expectations, and provide the resources for successful and safe operations. H&S leadership and commitment starts at the top with the Executive team and they will demonstrate strong leadership in times of crisis.

Zip World Executive team leads by:

- establishing a clear vision for the working group;
- sharing that vision with others so that they will follow willingly;
- providing information, methods, and resources to realize that vision, and
- co-ordinating and balancing conflicting interests of all members and stakeholders.

The leadership team is required to lead all aspects of HSE Management by committing to positive actions in all operations and demonstrating to employees and contractors working for the company, their personal leadership.

The leadership team ensure that team members delegated with the responsibility to lead others are qualified and experienced enough to make the right decisions, oversee operations, and ensure targets are responsibly met. General Managers are accountable for organising and coordinating business activities to achieve defined strategic and agreed local objectives.

1.2 Company structure chart

Under review: Change to include DK, DS

1.3 Accountability

This requires Zip World management, company individuals, and contractors, to account for their actions, accept responsibility for them, and to disclose the results in a transparent manner.

2 Policy and Strategic Objectives

2.1 Policy

The Zip World HSE Policy requires the company to follow a systematic approach to HSE management and is designed to ensure compliance with the law and to achieve continuous performance improvement. The HSE Management System accompanying the Policy describes the elements of an HSE-MS and the minimum requirements in each element or heading.

An HSE management system facilitates the management of HSE hazards and effects associated with the business of the organisation. This includes the organisational structure, planning activities, responsibilities, standards, documentation, and resources for developing, implementing, achieving, reviewing and maintaining the organisation's HSE Policy and meeting its stated objectives.

The system concentrates on critical activities and should ensure that they are properly controlled and that measurements are made and reported to enable monitoring of overall performance and identification of areas for improvement. Management systems will provide a structured process for

the achievement of continual improvement. The rate of that is generally set by the organisation itself, considering growth and ride development.

The HSE MS will bring improvement in HSE performance in the longer term, but only after the company is 'working and improving the system'. This requires time for behavioural and attitudinal changes to support compliance with a system.

2.2 Strategic Objectives

A systematic risk-based approach to the management of HSE is in place as an integral part of business planning, with H&S goals, clearly defined and communicated objectives and targets shall be established and measured. A philosophy of continual improvement is applied to H&S by Zip World.

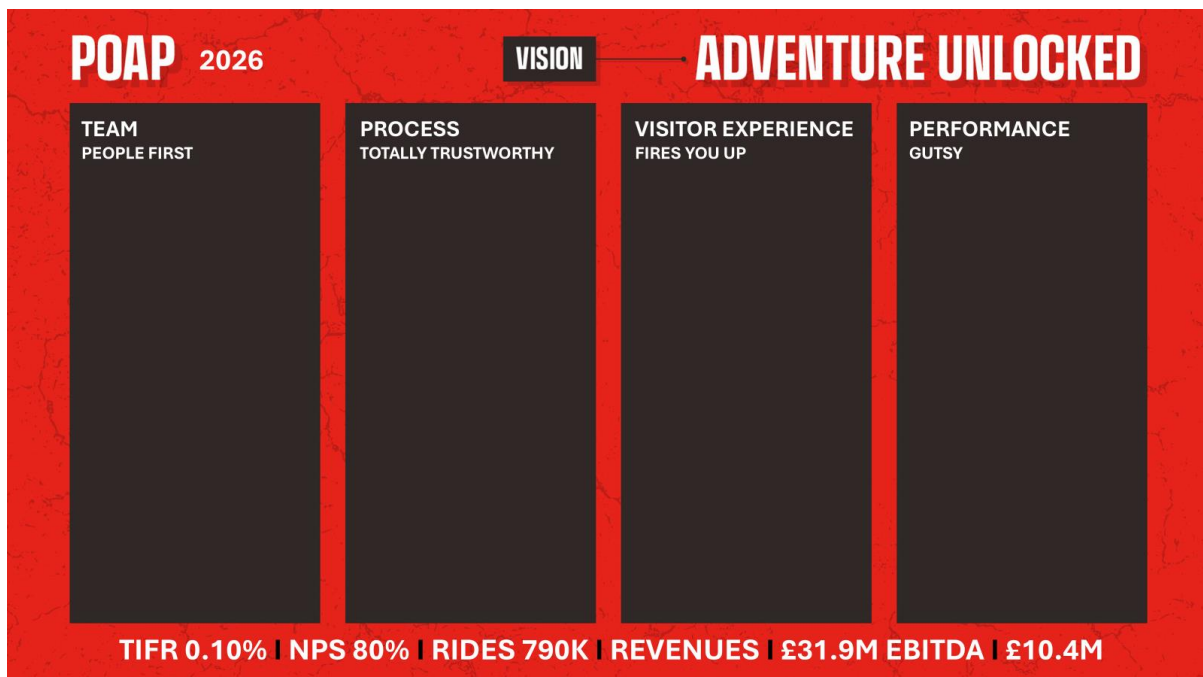
2.3 Performance Requirements

Business planning activities at all levels of Zip World include HSE considerations. On an annual basis, Zip World sets companywide H&S goals, objectives and targets within the HSE Strategy. Consistent with the HSE Policy and HSE Management System the strategy aims to deliver and to drive HSE performance improvement. These goals, objectives and targets are linked to leading and lagging indicators that are measurable, documented, communicated, and reviewed.

Business units set annual targets that support the achievement of Zip World company-wide targets and take into account significant risks, legal and other compliance requirements, and the interests of relevant stakeholders.

2.4 Operating Plan 2025-2026

Under review:



2.5 HSE Strategy 2026



Manager, team, and individual KPIs are set which support the achievement of both company and Business Unit targets. These KPIs are assessed as part of reward schemes and individual performance evaluation.

The HSE action plans are established which include clearly designated responsibilities, timeframes, resources and actions to achieve goals, objectives and targets. HSE risks are considered in the development of goals, objectives, and targets in annual HSE action plans.

Systems are established to periodically monitor and report the implementation of these goals, objectives and targets including the tracking of KPIs. Where conflicts exist between HSE goals, objectives and targets and other business goals, objectives and targets, resolution is consistent with the requirements of these HSE Standards.

3 Organisation, Responsibilities, Resources, Standards and Documents

3.1 Organisation

Responsibilities at all levels will be clearly described, communicated, and understood. Team members will be developed following structured competency assessment and training systems.

The organisational structure, roles, responsibilities, authorities, accountabilities, and interrelations (e.g. partners, contractors, regulators) necessary to implement the HSE MS will be defined, documented, communicated, and reviewed at regular intervals.

The Executive team will appoint General Managers who will have clearly defined roles, responsibilities, authority, and resources for ensuring that HSE MS requirements are established, implemented, and maintained in all locations and spheres of operation within the organisation.

The General Managers will be accountable to the Executive team and should have sufficient knowledge of the company and its activities, and of HSE issues, with sufficient authority to undertake the role effectively. They will regularly report on the performance of the HSE MS for review and as a basis for improvement. They will ensure the implementation of the HSE MS in accordance with this Guideline.

All HSE critical activities will be identified and recorded in the annual HSE plan for each applicable site. Responsibilities will be assigned to every HSE critical activity and inputs and outputs necessary for its control recorded. Performance standards and mechanisms for verification will also be in place, providing an auditable program.

Team members (company and contractors) competencies for HSE critical activities will be defined and responsibilities and requirements associated with the control of the activities understood by the team members.

HSE responsibilities will be updated and revised in conjunction with Zip World team members (company and contractor).

3.2 Responsibilities – Risk Manager and HSE Advisors

The Risk Manager (or) HSE advisor will have direct access to Exec and senior management.

Risk Manager (or) HSE advisor shall be HSE competent persons who meet the relevant regulatory and professional requirements to be able to provide professional HSE advice.

Risk Manager (or) HSE advisor shall be the custodian of the HSE MS but will not be responsible for the management of HSE critical activities. This is the responsibility of the Executive team. Risk Manager (or) HSE advisor or HSE advisors are responsible for the quality and timeliness of HSE advice.

Risk Manager (or) HSE advisor will monitor and communicate information on HSE issues (legal requirements, stakeholder concerns) and best practice from internal and external sources.

Risk Manager (or) HSE advisor will collate HSE performance reports and maintain HSE performance data for internal use - including input to the review by Executive Team and Board Members and co-ordinate the preparation and verification of the annual HSE Report.

Risk Manager (or) HSE advisor will maintain an independent schedule of HSE audits/inspections and participate in the review of findings from all audits/inspections/incident investigations.

3.3 Resources

The Executive team will ensure that sufficient resources are available to ensure the effective operation of the HSE MS and effective management of risks. This will include resources available for:

- prompt rectification of HSE related deficiencies identified by the company or regulators
- on-going verification that HSE critical systems function in accordance with the design intent and objectives
- ongoing training to maintain and enhance competencies

- experienced and appropriately trained team members shall be posted in H&S roles.

Procedures will ensure that any changes in resource level do not increase HSE risk e.g. leave rotations will ensure resourcing does not drop to a level that will compromise HSE critical activities.

3.4 Standards and Documents

A system will be in place for the management and control of documents in paper and/or electronic format. This will include formal administration, custodianship for technical correctness and communication of correct use.

3.5 Health and Safety

The HSE management standards outline requirements in the areas of H&S with the aim of:

- protecting, promoting, and improving the health and wellbeing of Zip World employees
- minimising and managing occupational exposures to all personnel
- minimising adverse impacts of our operations on the communities
- providing a work environment where people can work safely and understand their rights and obligations towards a safe workplace
- promoting a rewarding workplace for employees by encouraging personal development, recognising good performance, valuing teamwork, and fostering equality of opportunity

3.5.1 Zip World 10 Safety Principles

The Zip World 10 Safety Principles describe the safety culture that is expected of the employees, and contractors. These will be fully integrated by Zip World and will detail the fundamental principles and safety culture that will enable all teams to operate and be compliant with the expectations of the Zip World Integrated Policy Statement.

The 10 Safety Principles are:

1. We believe all incidents and injuries can be prevented
2. Everyone's first responsibility is to ensure they work safely
3. Everyone has the duty to stop their work if they feel the situation is unsafe
4. The expectations and standards are the same for everyone on the site
5. Rules and procedures must be observed and respected
6. We should look out for each other's safety and unsafe situations
7. All injuries and incidents /near misses must be reported and investigated
8. Risk assessment must be carried out prior to, during and on completion of work
9. We must always work within the limit of our competency and training
10. All line managers have a special responsibility for promoting and upholding these principles.

3.5.2. HSE Induction

All new personnel, including subcontractors, will undergo a basic program of HSE training before being allowed to commence work on the program. The four-hour minimum training will include:

- Who are Zip World
- Zip World Integrated Policy Statement

- Zero tolerance for substance abuse (drugs and alcohol)
- Zip World 10 Safety Principles
- Duty to stop work if they feel it is unsafe to work
- Overview of UK legal requirements related to Health and Safety at Work 1974
- Hazard identification and risk management awareness
- Job Safety Analysis and Last-Minute Risk Assessments
- Incident Reporting
- HSE Plan
- Emergency Response Plan
- Manual Handling
- Lock Out/Tag Out
- Permit to Work
- Security and Counter terrorism

Where subcontractors or personnel are not familiar with the concepts of adventure tourism, an introductory presentation will be included.

HSE Induction training shall be conducted by the Zip World site Safety Representative through the Train the Trainer system.

HSE Awareness refresher training shall be completed once annually, to all employees, with a relevant and proposed H&S program developed by the HSE Team and agreed and sanctioned by the Exec.

3.5.3 Environment and Community

- Promote the reduction and prevention of pollution, efficient use of resources and energy and biodiversity protection
- Promote a culture of benefiting and respecting the rights and interest of the communities in which Zip World operates
- Consideration of the environmental and social impact of the resources, products, and services we use or provide to others and caring about our impact on customers, colleagues, the community, environment and for shareholders.

3.5.4 Competency

- All personnel who perform H&S critical activities are safety critical roles and require appropriate experience, qualifications, and training to ensure their competence to undertake these important risk control measures
- An HSE competency assurance process should be in place for all HSE critical employees (company and contractor). This will document the required and actual HSE competence of employees
- The competency requirements of all safety critical activities will be periodically reviewed and improved where possible. The competence of employees will be reassessed, and shortfalls addressed.

3.5.5 H&S Plan

The company will identify and document those critical operations and installations, which require a fully documented demonstration that risks have been reduced to a level as low as reasonably practicable (ALARP) (Refer to part 5 and Hazard and Effect register & section 4 Hazard and Effects Management).

HSE Plans compliant with regulatory requirements and EP guidelines will be available for these operations and installations defined as critical. The HSE plan will be endorsed by the asset or process owner and by those managing the asset or operation.

The HSE Plan shall also accurately reflect current practice at the location or site and be reviewed as per described plan review cycles.

Contractors managing H&S critical activities will provide risk assessments for the scope of the work, competencies shall be reviewed along with liability insurances.

The HSE Plan shall demonstrate that controls in place to reduce risks to ALARP.

3.5.6 Safety Communication

The success of the Zip World meeting its H&S goals and objectives will depend on establishing clear and effective lines of communication both internally within the business units, and other Zip World sites, and externally with third party stakeholders including government and local institutions as well as interested third parties.

Internal safety communications will include but not be limited to:

- Safety Message (DS) KD
- Weekly Base Camp Safety Meeting (WSM) MB
- Senior Management Safety Meeting (SMSM) MB/All
- Monthly Board Meeting (MBM)
- Bi-Monthly Safety Committee Meetings. (MSCM) KD
- HSE information notice boards KD
- HSE Alerts, both for general awareness and following incident investigations. MB
- HSE training and instruction. KD/EL
- Safety Representative conducting vlog, highlighting safety principles, STOP card actions taken. KD
- HSE feedback from the employees and contractors via the system of JotForm proactive safety observation cards (STOP) – Action Tracking Register.

3.5.7. Implementation and Monitoring

Regular inspections, checks and work observations will be conducted to verify whether and to what extent, rules described in Zip World's Integrated Policy Statement, 10 Safety Principles and the HSE Plan are being followed.

Inspections, cross-inspections, ERP preparedness checks, safety principle inspections and work observations shall be carried out according to the Plan of Inspections prepared by the Operations Director, Health, Safety and Risk Manager. The plan of inspections is a living document and may be changed when it can help to improve safety or when the initially planned scope of work is modified.

3.5.8. Safety Inspection frequency

Inspections shall be conducted and linked to KPI's as follows:

	Work Observation	Cross Inspection	ERP preparedness Inspection	Safety Principles Inspection
Leadership Team member	1 monthly	1 monthly	2 annually	2 annually
General Manager	1 monthly		2 annually	2 annually
Operations Manager	1 monthly		2 annually	2 annually
Team Leader	1 monthly	1 monthly		

4. Risk Management

4.1 Definitions

Hazard is the inherent property of a situation or physical item likely to cause harm, including ill health or injury, damage to property, plant, products or the environment, production losses or increased liabilities.

Risk is the product of the chance that a specified undesired event will occur (probability) and the severity of the outcome of the event (consequences).

Hazards are therefore intrinsic, and risk is related to a particular situation. The same hazard may present different risk levels in different situations. For this reason, risk levels cannot be generic, and do not appear in the company Hazard Register. All risks must be assessed on a project-by-project and site-by-site basis.

An **unsafe act or condition** (USA/USC) is a failure by personnel to follow procedures for safe working or to observe controls which should be in place or a lack of such procedures or controls which creates a situation which may cause injury, damage, or other loss.

A **near miss** is an event or sequence of events which have no measurable outcome, but which may be significant in future operations because of probability of recurrence and/or potential outcome.

An environmental incident is any incident which has measurable impact or potential for measurable impact on the environment.

A damage incident is any equipment failure or damage related to HSE.

"As low as reasonably practicable" (ALARP) means risk reduced to levels such that further risk reduction measures would be so disproportionate to the probability of occurrence that it would be objectively unreasonable to implement them.

4.2 The Risk Management System

Effective risk management is the cornerstone of the Zip World HSEMS. The company Risk Management System is based on five processes:

1. Identification of hazards
2. Analysis of risks
3. Control of risks
4. Action point listing
5. Recovery from incidents

4.3 Identification of hazards

The hazard identification process is continuous. At the planning stage of any operation, best efforts are made to identify hazards that may affect that operation because of the local environment or the equipment and techniques in use. The process is then on-going, identifying new hazards as mobilization, start-up and production proceed. Hazards may be identified through:

- previous experience in the area
- local knowledge, including that of third parties
- general observation and safety awareness
- safety audits
- accident/incident investigations
- drills and exercises
- safety meetings

Action to be taken by individuals on identifying a hazard is:

1. eliminate or control the hazard immediately (or) isolate the hazard to prevent an accident
2. report the hazard using the standard Jotform or STOP card in both of the above cases.

Note that all hazards are to be reported, including those eliminated or controlled immediately. These are collected and collated by the HSE Advisors, who will analyse the results to identify trends and direct remedial action. Note that any situation where an incident could cause injury or other significant loss under different circumstances, should be reported as a near miss.

4.4 Analysis of risk

Every reported hazard is analysed for risk level. Where possible, this should be a quantitative process, but the nature of operations usually involves risks that can only be subjected to qualitative analysis. This qualitative process is conducted according to the Zip World risk matrix based on the knowledge and experience of the persons conducting the analysis. Assessments should always be conducted by a group of people with relevant experience, and a consensus reached as to the risk level involved. Assessments should never be done by one person alone, as the assessment will be skewed by their individual experience, opinions and prejudices.

4.5 Zip World Risk Matrix

		Likelihood				
		Rare 1	Unlikely 2	Possible 3	Likely 4	Almost Certain 5
Severity	Insignificant 1	1	2	3	4	5
	Minor 2	2	4	6	8	10
	Moderate 3	3	6	9	12	15
	Major 4	4	8	12	16	20
	Catastrophic 5	5	10	15	20	25

4.6 Assessment before mitigation

A first risk evaluation of hazard is conducted by using the risk matrix. This evaluation is determined by the fact that controls are not totally in place.

The risk matrix is an integral part of the HSEMS. It is associated with the Hazard Identification Register system and the Incident investigation. The matrix may be used to assess an actual situation (real consequences of an incident) as well as the potential of an event: Risk Assessment, Near Misses, Unsafe Acts and Unsafe Conditions.

The Intolerable red area is considered unacceptable. In case of intolerable risks situations, immediate urgent corrective actions are to be taken by the management to bring back to acceptable standards.

In other cases, to ensure a continuous improvement, normal attention must be given by the management to HSE matters and a focus on these risks will maintain within acceptable risk level.

The risk matrix provides for analysis of probability of occurrence and severity of consequence or potential consequence, producing a rating as an alpha-numeric code. The product of probability versus outcome is then classified into three risk groups; low, medium or high risk. The level of risk does not indicate whether action is required, but is indicative of how much effort and urgency must be put in to controlling the risk. All risk levels must be controlled to some extent.

Major hazards are those which fall into the yellow and red zones of the risk matrix. Those in the GREEN zone are called insignificant hazards.

4.7 Control of risks

The hazard and its associated risks are controlled by either reducing probability of occurrence or by mitigating the effects. This may be achieved by one or more of the following steps:

Eliminate:	Remove the hazard entirely, or change the operation so there is no exposure to the hazard
Substitute:	Replace the hazards/hazardous items with items which will achieve the same task at a lower risk level
Reduce:	Reduce the quantity of the hazardous item or the number of people exposed to the hazard, or the time people are exposed to the hazard
Isolate:	Physically separate the hazard from personnel, equipment or the environment using guards, containment measures or separation
Procedures:	Apply procedures for safe work in the presence of the hazard
Protect:	use personal protective equipment and clothing (PPE & C) to mitigate the outcome of any incident.

Note that these measures are listed from most effective (eliminate) to least effective (protect). Efforts should be made to use the most effective possible measures to achieve results, and several measures may be applicable to any one situation.

The importance of human behaviour in the correct application of the above measures is paramount.

Once the control measures have been designed, the hazard must be analysed on the risk matrix to ensure that risk has been reduced to acceptable levels.

Control measures other than elimination should be constantly monitored.

4.8 The hazard identification registers

All identified hazards are documented in the company corporate hazard register in which details of each hazard are recorded on a formal register. This is intended as a resource for planning operations, where relevant hazards are highlighted in the HSE plan or procedures manual.

During the planning stage of any operation, the hazard register should be consulted, and all applicable hazards extracted. All of these should be assessed for risk level in the situation presented by the operation being planned. Major hazards are documented in the applicable HSE Plan; significant hazards are managed at low level by safe working procedures.

Note that risk presented by any hazard is related to the situation in which it exists, and that the risk analysis is therefore conducted on a project or facility basis; analysis is therefore absent in the company register.

The corporate hazard register is maintained by the Risk Manager. New hazards identified should be notified to the Risk Manager for review and inclusion in the hazard register.

Evaluation after mitigation

A second risk evaluation of the hazard is conducted by using the Risk Matrix. This evaluation is determined by the fact that controls are totally in place.

4.9 Remedial Work Plan - RWP

Hazards and risks not immediately controlled are recorded in a RWP which tracks hazards remaining in an uncontrolled condition as Action Points (APs). The HSE team will be the custodian of the RWP. For each AP, the following are defined:

- serial number
- date opened
- what is to be done
- person/s responsible for closure
- time limit on closure
- status (open or closed)

Closure of APs must be verified by the Risk Manager and notified as above.

Each AP will hold all entries for the previous 12 months or since the start of the current project (whichever is longer). This includes all closed APs and those APs which were open previous to a project start-up. Open APs relating to sub-contractors going off hire will be passed to those sub-contractors by the crew or facility manager at the end of any contract.

Action Points may be generated from a host of activities, including STOP cards, hazard reports, audits, meetings and accident investigations.

4.10 Recovery from incidents

Plans must be in place to mitigate the effects of and recover from the release of any hazard. This may require only simple remedies such as first aid boxes, extending up to full Emergency Response Plans where potential losses are high.

Where required, written contingency plans are prepared to recover from the effects of any foreseen situation and return to normal work. These will include:

- damage limitation plans
- confirmation that any situation is over and/or under complete control
- treatment and evacuation of injured personnel
- dealing with the public and media
- replacement of damaged equipment
- replenishment of consumables, such as fire-fighting equipment, first aid supplies
- testing of systems for safe operation
- re-training of personnel
- procedure to reopen rides post incident investigation

5. Planning and Procedures

This section addresses the planning of work activities, including the risk reduction measures (selected through the evaluation and risk management process). This includes planning for existing operations, managing changes and developing emergency response measures.

UK Regulations Guide

Zip World conducts its operations in line with the following regulations and standards:

Legislation and Regulations

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Construction (Design and Management) Regulations 2015
- Personal Protective Equipment at Work Regulations 1992 (as amended 2022)
- Mines Regulations 2014
- Mines and Quarries Act 1954 (as applicable)
- Regulation (EC) No 853/2004 and Food Safety and Hygiene (England) Regulations 2013

Standards and Industry Schemes

- EN 15567-1 & EN 15567-2 (Ropes Course Standards)
- ADIPS
- LEAPS

5.1 Procedure Requirement

Relevant legal and regulatory requirements and voluntary commitments are identified, documented, made accessible, understood and complied with wherever Zip World operates. Effective HSE document control systems are in place to ensure clarity of company expectations and to facilitate efficient and accurate information management.

5.1.1 Performance Requirements

HSE related acts and regulations are maintained and available. Legislative and regulatory requirements (including licences, permits and approval conditions) and voluntary commitments applicable to specific Zip World operations are identified and documented in a Site register.

Regulatory registers are reviewed and kept up-to-date, and all changes are communicated to all relevant personnel.

Wherever possible, legislative and other external requirements are incorporated into the relevant operational procedures to ensure consistent, ongoing compliance with these requirements.

Compliance with legal and other requirements is demonstrated, evaluated, and reported.

Systems are in place to ensure that HSE records are established, maintained, accurate, legible, and identifiable and to manage the archiving and disposal of HSE records.

HSE records have established retention times, consistent with legal requirements and knowledge preservation, and are assigned to responsible custodians.

Employee health, medical and occupational exposure records are maintained and retained as necessary, with appropriate confidentiality in place.

5.2 Procedures and Work Instructions

All HSE-critical activities and the supporting tasks will have written procedures or work instructions in place as necessary.

The appropriate safe operating procedures (SOP) will be readily accessible to employees, suppliers and contractors and be written in a way that users will understand. Managers will ensure that relevant H&S procedures and requirements for their assets are communicated to suppliers and contractors.

A defined process for the development and review of HSE standards, procedures and work instructions will be in place, which includes employee involvement. This process must ensure that HSE objectives are achieved, best practices are incorporated, and legislative requirements are met.

There will be evidence that in addition to the formal review cycle, modifications to standards, procedures and work instructions are initiated by operations personnel and reviewed considering incidents.

5.3 Management of Change

Zip World will maintain written procedures for the planning and control of all changes (i.e. not only equipment changes but also organisational restructuring), both permanent and temporary, in people, plant, plant controls, processes, and procedures, to assess HSE impact and avoid adverse HSE consequences.

Change control procedures for projects will document the evaluation and approval process, and the responsibilities and competencies of those involved.

Comparative analysis and documentation of the HSE impact of implementing the change as well as the HSE impact of the implemented change will be an integral part of all change control procedures.

5.4 Contingency and Emergency Planning

The risk management process may identify situations which may be considered as having the potential to become emergencies, where life may be endangered. Because of the nature of adventure operations, Zip World requires that emergency plans are prepared for every contract for the following scenarios under the Emergency Response Preparedness Policy:

- fire on any premises or work site
- evacuation of injured or ill personnel (medevac)
- driving incidents
- missing person situations
- spills and unplanned releases of product or other materials
- outbreaks of disease
- natural events – storms, high winds, lightning, heavy rain, snow

Individual projects and events may require further emergency plans depending on local conditions and are the responsibility of the General Manager.

Emergency plans will be based on one or more of the following prioritised aims:

- save human life
- move to a place of safety
- save assets - (without endangering personnel)
- protect the environment - (without endangering personnel)

Emergency response plans shall cover:

- organization, responsibilities, authorities and procedures for emergency response and disaster control, including the maintenance of internal and external communications
- systems and procedures for providing personnel refuge, evacuation, rescue and medical treatment
- systems and procedures for preventing, mitigating and monitoring environmental effects of emergency actions
- procedures for communicating with authorities, relatives and other relevant parties
- systems and procedures for mobilizing company equipment, facilities and personnel
- arrangements and procedures for mobilizing third party resources for emergency support
- arrangements for training response teams and for testing the emergency systems and procedures

Procedures shall be in place for the periodic assessment of emergency equipment needs and the maintenance of such equipment in a ready state.

5.5 Frequency of Emergency Drills (KPI).

Business Units	Fire Drill	Medevac Drill	Man Lost Drill
Llechwedd	Twice annually	Twice annually	Once annually
Penrhyn Quarry	Twice annually	Twice annually	Once annually
Betws-y-Coed	Twice annually	Twice annually	Once annually
Tower	Twice annually	Twice annually	Once annually
Big Red	Within four weeks of opening	Within four weeks of opening	Within four weeks of opening
Tyn-y-Coed	Twice annually	Twice annually	Twice annually
Manchester	Twice annually	Twice annually	Twice annually
Windermere	Twice annually	Twice annually	Twice annually
London	Twice annually	Twice annually	Twice annually
Cardiff	Twice annually	Twice annually	Twice annually

To assess the effectiveness of response plans, Zip World shall maintain procedures to test emergency plans by scenario drills and other suitable means, at appropriate time intervals, and to revise them as necessary based on the experience gained. It is particularly important that the response to any real situation is analysed after the event to judge its effectiveness and make improvements where necessary.

6. Implementation and Monitoring

This section address how activities are to be performed and monitored, and how corrective action is to be taken when necessary.

6.1 Procedure Requirement

HSE performance targets will be set to ensure progression towards the long-term goals of no harm to people and no damage to the environment.

Performance indicators will be established, monitored and results reported in a way that can be externally verified.

All HSE incidents and near misses with significant actual or potential consequences will be thoroughly investigated and reported.

6.2 Performance Monitoring

Activities and tasks will be conducted according to the procedures and work instructions of the company (Refer 5.2 Procedures and work instructions). The Exec will ensure that there are systems in place to verify that the tasks and activities are carried out in accordance with these procedures and work instructions.

The HSEMS will include documented and maintained procedures to monitor the implementation of the HSE MS (proactive e.g. progress on close out of audit action items) and HSE performance (reactive statistics e.g. incidents, deviations) on a regular basis.

Proactive measures such as 'management safety visits' and 'site safety inspections', shall be in use to monitor performance and identify shortcomings.

A documented procedure for the periodic evaluation of compliance with relevant HSE legislation and regulations will be maintained.

The company will regularly measure, record, track and report HSE performance against targets set in the HSE Plan and in maintaining control.

Where monitoring equipment is required for performance measurement and monitoring, the company will establish and maintain procedures and retain records for the calibration and maintenance of such equipment.

Procedures will be established for data handling and interpretation (including the calibration of equipment).

The progress of individuals in undertaking their HSE critical activities and also in meeting planned HSE targets will be monitored through the staff appraisal system.

The company will establish and maintain procedures for the identification, maintenance and disposition of HSE records. These should include:

- reports of audits and reviews
- audit tracking data
- register of or a means of identifying and accessing legislation applicable to the company activities
- legally required documents
- situations of non-compliance with HSE policy, and of improvement actions
- any incidents and follow-up actions
- any complaints and follow-up actions
- appropriate supplier and contractor information
- inspection and maintenance reports of HSE critical equipment i.e. equipment providing a control and recovery function
- product identification and composition data
- data obtained from monitoring as input to performance records
- results of emergency drills and exercises
- training records which include HSE competency requirements which include HSE

HSE records will be legible, identifiable; traceable to the activities involved with retention times defined. They will be stored and maintained to prevent loss and unintended use.

6.3 Non-Compliance & Corrective Action

The company will maintain procedures for defining responsibility and authority for:

- the handling and investigating of non-conformances with legislation, regulations, HSE MS policies, procedures and standards
- identify root causes and taking action to mitigate any consequences arising from such non conformances
- the initiation and completion of corrective and preventative actions
- confirmation of the effectiveness of corrective and preventative action taken

Any corrective or preventative action taken to eliminate the causes of actual and potential non-conformances will be appropriate to the magnitude of problems and commensurate with the HSE risks encountered. Zip World will implement and record any changes in the documented procedures resulting from corrective and preventative action.

To prevent non-compliance with standards and procedures a documented system for variance/change control will be in place. Employees will be aware of the system. (Refer 5.3 Management of Change).

6.4 Incident Reporting & Follow Up

Zip World maintains procedures for the reporting and investigation of hazardous situations, near misses and incidents, which are compliant with its policies, procedures and legal standards.

Incidents will be investigated in a timely manner, with accountabilities assigned, and progress on recommended actions monitored until close out.

The company will foster a culture of openness in reporting all incidents and near misses.

Team Members will be aware of the near miss and incident reporting procedures and participate in incident investigations.

Any corrective or preventative action taken to eliminate the causes of potential incidents will be appropriate to the magnitude of problems and commensurate with the HSE risks encountered. Training will be provided in incident investigation to appropriate staff throughout the company (5 whys, Tap Root, Barrier breach).

Zip World will implement and record any changes in the documented procedures resulting from corrective and preventative action. Lessons learnt from accidents and incidents will be disseminated to relevant personnel and contractors. A safe to open protocol/authority to operate shall be implemented to ensure adventure rides are formally deemed safe to reopen post incident investigation.

7. Audit

7.1 HSE MS Procedure Requirement

An audit programme will be in place to review and verify effectiveness of the management system. It will include audits by auditors independent of the process or facility audited.

7.1.1 Audit Plan

The company will establish and maintain an audit programme and procedure for HSE audits to be carried out in accordance with Zip World.

A one year audit plan will be established including HSE audits of all facilities and operations on a fixed time scale appropriate to the facility and the risks associated with the activity or the operation.

Audit programmes may include:

- HSE MS audits
- independent audits (that is, audits led by auditors approved by the Exec)
- specific activity audits (facilities, start up, projects, process safety, occupational health).
- Zip World 10 Safety Principles audit
- ADIPS/LEAPS inspection
- Food safety audits.
- STOP Cards

A detailed annual plan for audits will be in place that will cover the whole HSE MS including operations and projects that have been contracted out. Only personnel, who have received adequate training, will lead audits. (Refer 7.1.2 Auditor Competencies).

The company will maintain an effective control process to ensure that audit findings are recorded, prioritised, corrective actions identified, action parties are assigned, and targeted completion dates are identified and findings tracked to final close-out. Best practices and key lessons learned should be shared with all locations/assets as appropriate.

A periodic review by management of audit findings/trends and follow up action plans will take place (Refer: 8. Review).

7.1.2 Auditor Competency

Audit procedures will specify the requirements of audit teams in terms of competency, experience in subject area of the audit and impartiality.

An audit focal point or department responsible for the audit process will coordinate the appointment of competent HSE auditors. A competence assurance system will be in operation to define auditor competence and ensure that relevant HSE auditor training is provided. A number of employees from different areas of the company will be identified to carry out HSE audits.

7.1.3 Contractor Audits

Prior to the commencement of the operations contracting companies will provide Zip World with training certifications as per their individual contract requirements. Where gaps are identified, Zip World will either ask the contractor to certify their personnel, or they will participate in Zip World's training sessions. As a minimum, the Risk Manager will prior to allowing the person to work will witness statutory certifications. The preference though, is for the contractor to provide a copy of the certification. Records of subsequent training provided on the crew will be kept in the Facilities Managers office.

Contractors failing to comply with the HSE expectations of Zip World are subject to removal from the place of work or contract termination.

8. Review

Management will regularly review the suitability and effectiveness of the system.

8.1 Review

A formal process will be in place for top/senior management to review the effectiveness and suitability of the MS in managing HSE risks and ensuring continuous improvement in HSE performance.

The review will address but not be limited to:

- the findings of previous reviews
- the need to change HSE policies and strategic objectives
- the impact of significant organisational, location or activity changes the HSE concerns of employees, contractors and external stakeholders
- the provision of adequate resources and competent personnel to achieve HSE targets objectives and strategies
- audit findings

- Self-Appraisal Assessment (HSE-MS)
- verification of closure of corrective actions resulting from HSE reviews, audits, inspections and incident investigations, and
- review of legal compliance. Management Reviews of the MS will take place on an annual basis. Performance against annual HSE Plans and Department HSE Plans will be reviewed regularly
- Results of Management reviews and identified remedial actions will be documented and monitored until conclusion.

Annex A - Sewage Effluent Management (Zip World Betws-y-Coed)

1. Site Summary

- **Location:** Zip-World Betws-y-Coed, A470, Betws-y-Coed, LL24 0HX
- **OS Grid Reference:** SH 80497 57423
- **What3Words:** triangle.baseless.rich
- **Description:** Outdoor adventure attraction with visitor activity areas, reception and operational buildings, two cafés (Top Café and Forest Café), access routes, and parking.

Facilities contributing to sewage:

Area	Toilets	Urinals	Sinks / Kitchen / Cleaning
Top Site	4	1	4 (including café kitchen)
Forest Café	8	1	8 (including cleaning cupboard)

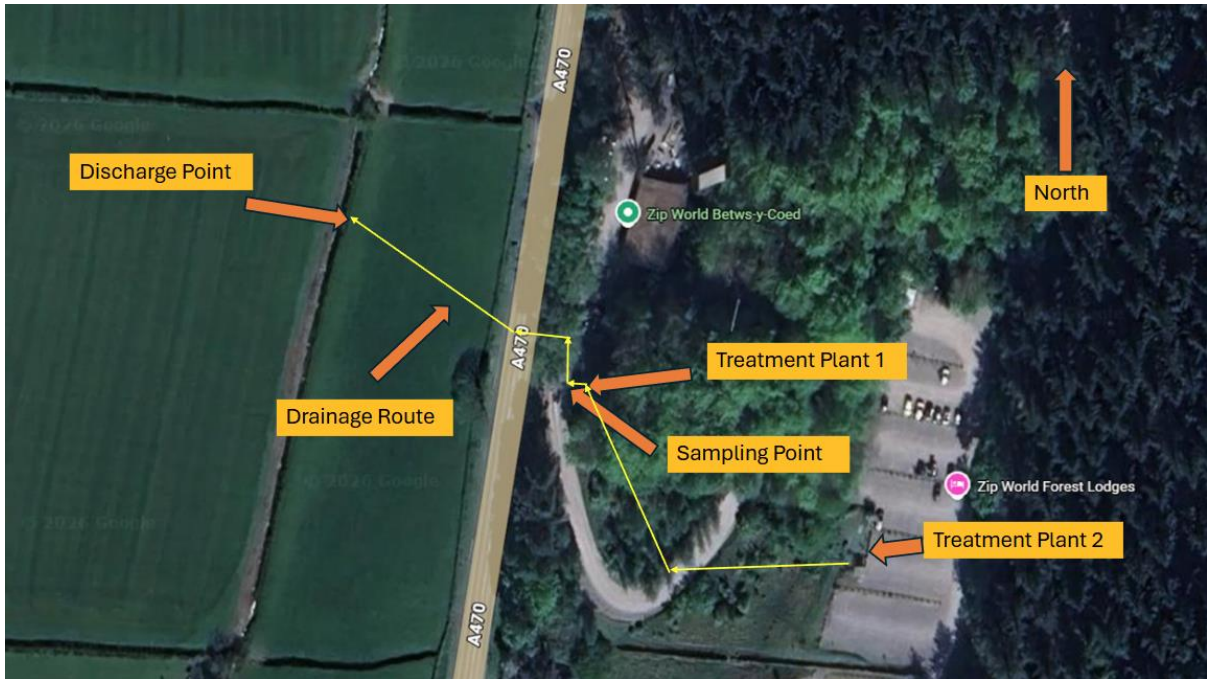
- **Water Supply:** Borehole; discharge estimated using per-person values from *Flows and Loads* 4.
- **Annual Visitor Participation:** ~183,115 activity participations (30% repeat visits).

2. Sewage System Overview

- **STP 1:** Serves top of site.
- **STP 2:** Serves bottom of site.
- **Discharge Path:** Treated effluent from both plants flows through a drainage channel to a manmade flowing drainage ditch.

Key Controls:

- Plants operate independently; no inter-treatment.
- No bypass to surface water.
- Single environmental receptor: farm drainage bed.



3. Permit Compliance

- **Maximum combined daily discharge:** STP 1 + STP 2 (as estimated from visitor numbers, per-person discharge, and facility usage).
- **Effluent quality:** Monitored to ensure permit compliance.
- **Monitoring and Responsibility:** Site General Manager oversees visitor throughput to avoid system overload.

4. Sewage Treatment Plant (STP) Management

Controls and Maintenance:

- Weekly visual inspections and odour checks
- Alarm verification (if fitted)
- Power supply verification
- Sludge level monitoring
- Annual servicing by external contractor
- Desludging as required

Supporting Records: Servicing certificates and inspection logs retained on site.

5. Drainage Channel Management

- Weekly inspections for:
 - Free flow of effluent
 - Absence of solids discharge
 - Structural integrity
 - Normal odour
- **Action:** Blockages or malfunctions treated as urgent pollution risks.

6. Discharge Point Monitoring (Manmade Flowing Drainage Ditch)

- Weekly checks for:
 - No visible solids or sewage fungus
 - No discolouration or abnormal odour
 - No erosion, ponding, or environmental impact
- **Action:** Investigate and report immediately; notify Risk Manager and NRW if pollution occurs or is likely.

7. Incident Response

Environmental incidents include: plant failure, permit exceedance, visible pollution, drainage blockage, alarms unresolved >24 hours.

Immediate Actions:

1. Identify and investigate source
2. Stop or reduce discharge if possible
3. Contact maintenance contractor
4. Log incidents and follow Accident Recording Policy
5. Notify NRW if pollution has occurred or is likely

8. Record Keeping

- Weekly inspection logs
- Maintenance and desludging records
- Incident reports
- Complaint logs
- Monitoring and calculation data
- Staff training records

All records retained **≥6 years** to demonstrate compliance.