

## Staying COVID-19 Secure in 2020

Totally Wicked Bidco Limited, Pillbox38 (UK) Limited, The Electronic Cigarette Company (UK) Limited and UK Vapour Brands Limited (Totally Wicked Group of Companies)

We confirm we have complied with the government's guidance on managing the risk of COVID-19. We have carried out a Risk Assessment (detailed below) across all physical areas in the business. We have produced detailed Operating Measures for each physical area (both customer facing and not), to make the business as safe as possible for employees, for suppliers' employees who have to visit our sites and for our customers.

- We have carried out a COVID-19 risk assessment and shared the results with the people who work here
- We have cleaning, handwashing and hygiene procedures in line with guidance
- We have taken all reasonable steps to help people work from home
- We have taken all reasonable steps to maintain a 2m distance in the workplace
- Where people cannot be 2m apart, we have done everything practical to manage transmission risk

Employee representatives have been appointed for each area of the business and any questions or concerns on our operating procedures may be made through these employee representatives, your line manager or any member of the Senior Leadership Team.

Any customer concerns may be raised with the Store Manager or Store Supervisor.



Marcus Saxton  
Chief Executive Officer

8 June 2020

<b>Risk Assessment Number.</b>	TW RA 113 COVID-19	<b>Location: (Site/ Building/ Room)</b>	All sites
<b>Assessment Date:</b>	29/05/2020	<b>Review Date:</b>	Ongoing during Pandemic
<b>Assessors Name:</b>	Liam Humberstone	<b>Job Title:</b>	Technical Director
<b>Task:</b> All work related activities for Totally Wicked Group Employees – Coronavirus/COVID-19 risks			

What are the hazards? (See list of sample hazards)	Who might be harmed? (e.g. Staff, visitors)	Guidelines	Company Control measures	In place? Yes/ No	Corrective actions required	Risk Evaluation			Risk Rating
						Consequence (1 – 3)	Likelihood (1 – 3)	Overall risk (C x L)	Low, Medium or High
“Extremely vulnerable” group exposed to virus at work.	Staff	Government and NHS have defined a group of population deemed to be at much higher than average risk if exposed to virus. This group have been written to by their GP and advised that they should be “shielded”.	All employees in this group to work from home or furloughed.	Yes	None	3	1	3	Medium Risk
Employees exposed to virus or expose others to virus at work - <b>General</b>	Staff	Government has recommended social distancing and other further measures to be used in workplace.	All employees that practically can, work from home.  Strict observation of >2 metre separation of employees in contact for 15 minutes or more wherever possible.  Where not possible, or passing at <2 metre more than occasionally, face masks with requisite instruction in place.  Regular hand washing encouraged, provision of hand sanitiser.  Teams separated into functional areas and interactions limited.  Instruction given to recognise symptoms and take appropriate action.  Additional cleaning in all areas.	Yes	None	2	1	2	Low Risk

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						Consequence (1 – 3)	Likelihood (1 – 3)	Overall risk (C x L)	Low, Medium or High
Employees exposed to virus or expose others to virus at work - <b>Office</b>	Staff	Additional precautions for office environments.	Work stations single person, no hot-desking.  Shared equipment (e.g. printers) cleaned, particularly at touch points, after every use.	Yes	None	2	1	2	Low Risk
Employees exposed to virus or expose others to virus at work - <b>Warehouse</b>	Staff	Additional precautions for warehouse environments.	Due to potential of passing frequency, masks worn at all times with instructions for safe use.  Shared equipment (e.g. pallet truck, picking trays) cleaned, particularly at touch points, before change of user.	Yes	None	2	1	2	Low Risk
Employees exposed to virus or expose others to virus – <b>Deliveries / Goods inward</b>	Staff / Delivery Drivers	Actions must be taken to reduce risk when goods and/or materials delivered.	Delivery drivers may not enter buildings.  Drivers asked to remain in vehicle where possible.  Single person unloads if possible	Yes	None	2	2	2	Low Risk
Employees exposed to virus or expose others to virus at work – <b>e-liquid production and finishing</b>	Staff	Additional precautions for e-liquid production environments.	Due to fixed positions on machines, masks worn at all times with instructions for safe use.  Fixed 3 person teams distanced at >2m from other teams.	Yes	None	2	1	2	Low Risk
Employees exposed to virus or expose other to virus – <b>Canteens/ Kitchens</b>	Staff	Additional precautions for canteen / Kitchen environments	Employees encouraged to bring food and stay at work during lunch breaks.  Breaks separated into shifts to reduce interaction.  Cleaning regime increased in thoroughness and frequency.	Yes	None	2	1	2	Low risk

What are the hazards? (See list of sample hazards)	Who might be harmed? (e.g. Staff, visitors)	Guidelines	Company Control measures	In place? Yes/ No	Corrective actions required	Risk Evaluation			Risk Rating
						Consequence (1 – 3)	Likelihood (1 – 3)	Overall risk (C x L)	Low, Medium or High
Employees exposed to virus or expose others to virus – <b>Retail Stores</b>	Staff, Customers	Additional precautions for retail environments	<p>Number of customers allowed in store limited by floor area.</p> <p>Hand sanitiser provided for customers as well as team.</p> <p>Employees required to wear face masks with full instruction given.</p> <p>Full instruction given for store cleaning and schedule, particularly for touch points.</p> <p>Screen between customers and employee at till.</p> <p>Social distancing maintained in store.</p> <p>Specific instructions given for passing of goods and taking payment.</p> <p>Specific instructions given for maintenance work on customers' devices.</p>	<b>Yes</b>	<b>None</b>	<b>2</b>	<b>2</b>	<b>4</b>	<b>Medium Risk</b>
Employees exposed or expose other to virus – <b>Field Visits</b>	Staff	Additional precautions for field travel	<p>No journey may be made if it can reasonably be avoided.</p> <p>Field Merchandizing team instructed in safest working practices.</p> <p>Single vehicle occupancy preferred, with instruction for reducing risk if this is not possible.</p>	<b>Yes</b>	<b>None</b>	<b>2</b>	<b>2</b>	<b>4</b>	<b>Medium Risk</b>

1. EXAMPLE HAZARDS THAT MAY BE APPLICABLE TO THE JOB or WORK ACTIVITY			
Exposure of employee to coronavirus	Employee exposes others to coronavirus		

2. RISK MATRIX		Potential consequence of harm		
		1 – Minor Injury (e.g. hazard can cause illness, injury or equipment damage but the results would not be expected to be serious)	2 – Significant Injury (e.g. hazard can result in serious injury and/or illness, over 3 day absence)	3 – Major Injury (e.g. hazard capable of causing death or serious and life threatening injuries)
Likelihood of harm	1 – Unlikely (injury rare, though possible)	1 – Low	2 – Low	3 – Medium
	2 – Possible (injury could occur occasionally)	2 – Low	4 – Medium	6 – High
	3 – Probable (injury likely to occur, can be expected)	3 – Medium	6 – High	9 – Extreme

### 3. RISK EVALUATION

This is calculated by multiplying the likelihood against the consequence e.g. taking a likelihood of 1, which is classified as Unlikely and multiplying this against a Potential Consequence of 2, which is classified as Significant Injury, would give you an overall Risk Rating of 2, which would result in an overall evaluation as a low risk.

#### 1 to 2 = Low risk

Low risks are largely acceptable, monitor periodically to determine situation changes which may affect the risk, or after significant changes

#### 3 to 4 = Medium risk

Medium risks at the upper end of this band should only be tolerated for the short-term and then only whilst further control measures to mitigate the risk are being planned and introduced, within a defined time period. Risks on the lower end should be reduced if practicable.

#### 6 = High risk

High risks activities should cease immediately until further control measures to mitigate the risk are introduced. The continued effectiveness of control measures must be monitored periodically.

#### 9 = Extreme Risk

Work should not be started or continued until the risk has been mitigated. Immediate action is required to reduce exposure. A detailed mitigation plan must be developed, implemented and monitored by senior management to reduce the risk before work is allowed to commence.

### Use the risk rate to prioritize action

Where risks are assessed as requiring additional controls the following action plan should be used to manage the process. Action timescales depend on levels of risk — as far as reasonably practicable, the greater the risk the sooner action must be taken.

### ACTION PLAN FOR FURTHER CONTROLS

What is required?	By whom?	By when?
Twice-monthly review while coronavirus pandemic is active	LH/SM	12/06/20

In order to ensure that work continues to be safe, the control measures identified in the risk assessment must be implemented and maintained. The following checklist should be used to highlight how controls will be checked.

### PLAN FOR ACTIVE MONITORING

Control measure	How monitored?	By whom?	How often?
Assess likely infection level in workforce	Daily Staff Level update	LH/SM	Weekly

Risk assessments must be reviewed following any significant change, e.g. if there is any reason to suspect that the assessment is no longer valid and at least annually. The results of the reviews are to be recorded below.

*Any changes must be recorded on the assessment and communicated to the relevant staff.*

### DETAILS OF REVIEW

Date of review	Findings	Reviewed by?	Signature

The guidance contained in this section intended to serve as a general reminder of the risks that are sometimes encountered during the examination and sampling procedure and of the safety equipment that you should use and precautions that you should take.

You must refer to the legislation and the guidance of your national administration for more information.

### Revisions

Version	Date	Changes
TW RA 113 COVID-19	29/05/2020	Version 1