


Group Policy

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| Title | Health and Safety | | | | |
| Code | QA04 | Date | March 2025 | Issue Number | 32 |
| Authorised By | Matthew Brabin | Signature |  | | |
| Reason for Amendment | Annual Review | | | | |

ISO 45001, ISO 9001 & ISO 14001

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1 STATEMENT

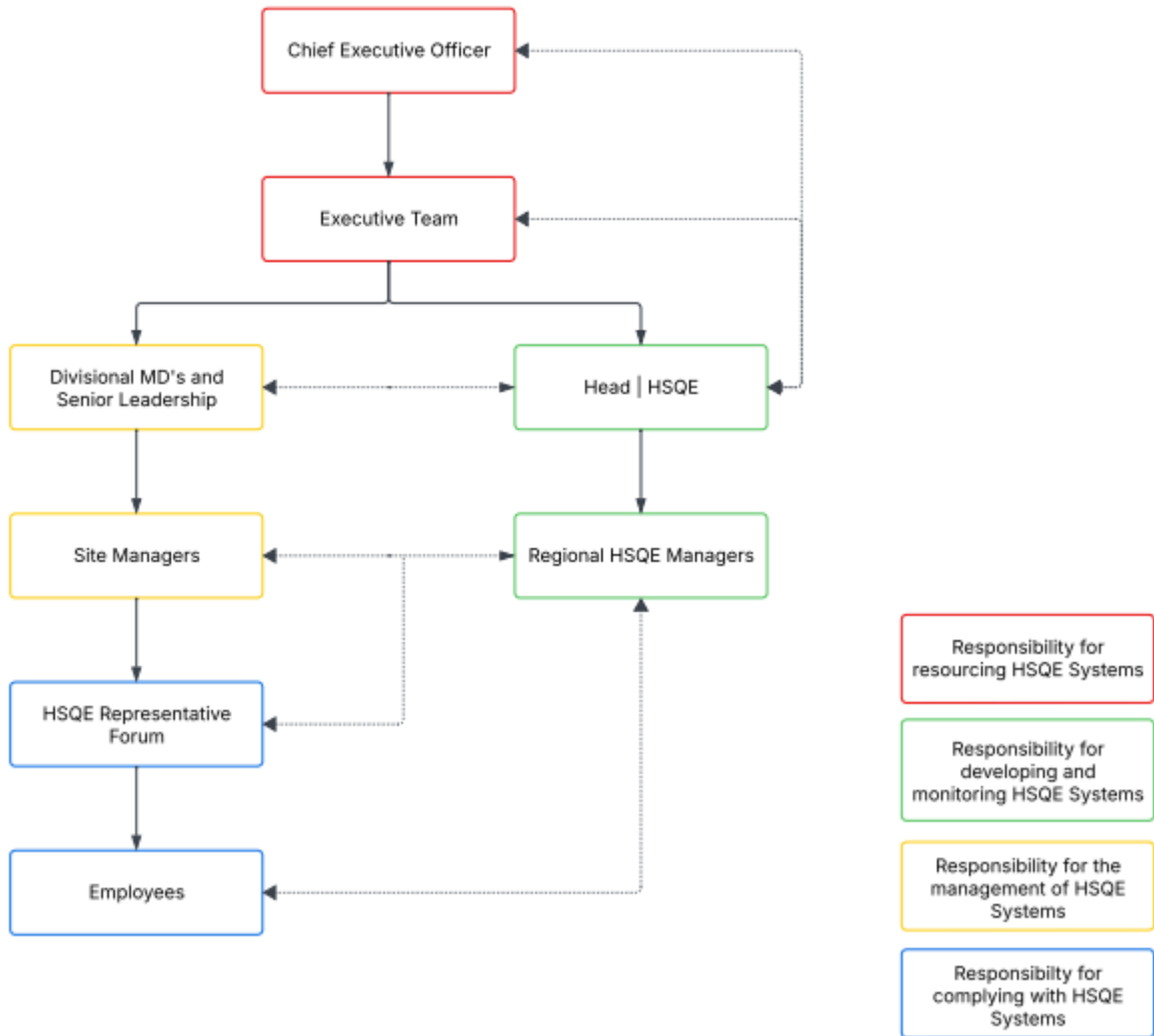
We recognise our responsibility under the Health & Safety at Work Act 1974, Law 31/95, the Prevention of Workplace Risks Law (Spain- Prevención de riesgos laborales), the Safety, Health and Welfare at Work Act 2005 (Ireland) and all other relevant statutory provisions, to protect and safeguard the health, safety and welfare of all employees and other persons who may be affected by our undertakings or activities.

Every employee and contractor have a responsibility for their own safety, health and environmental performance under the Health & Safety at Work Act 1974 and the Safety, Health and Welfare at Work Act 2005 (Ireland). This includes the duty to take reasonable care for their own safety and that of others whilst co-operating to enable us to comply with the law and make sure safe and healthy working is routine. We therefore expect you to co-operate and offer any assistance required to ensure that this Policy is effectively implemented.

Our Health & Safety Strategy is as follows:

- To strive for best practice Health and Safety standards in training, systems, facilities, premises, and equipment
- To consult with our employees to engender in them a collective commitment to Health and Safety standards.
- To provide effective communication at all levels to promote high standards of Health & Safety and continual improvement in Health and Safety performance.
- To provide information, instruction, training, and supervision, sufficient to ensure that all employees are fully aware of their responsibilities and of Health and Safety issues associated with their work.
- To develop safe products, services, and systems of work sufficient to ensure the Health & Safety of both employees and others who may be affected by our activities.
- To ensure the Health and Safety of anybody attending our premises or who may be affected by our activities.
- To undertake open and timely measuring, monitoring, and reporting of Health & Safety performance
- To maintain objectives that avoid injury and harm, minimise the severity of incidents and promote health and wellbeing.
- To allocate sufficient resources to drive the continual improvement of Health and Safety within the organisation.
- To review this Policy regularly, to accommodate changes in law/organisational developments and achieve or exceed compliance.
- To make this Policy and any changes to it, accessible to all our employees via the company intranet and to stakeholders on request

2 ORGANISATION



3 RESPONSIBILITIES

Responsibilities of the:

3.1 CEO

- To understand the application and implications of the Health & Safety at Work Act 1974, the Safety, Health, and Welfare at Work Act 2005 (Ireland) and other legislation relevant to our activities
- To ensure that health and safety management is aligned and integrated with our business strategy.
- To demonstrate visible and active commitment to good health and safety management
- To make available human, financial and technological resources essential to implement & improve the Health & Safety management system.
- To review the performance of the Health & Safety management system at regular intervals to ensure its effectiveness and ability to meet the objectives specified in this policy.
- To promote the Yellow Rules “Safety Culture”

3.2 Group Head | Health Safety Quality and Environment (HSQE)

- To understand the application and implications of the Health & Safety at Work Act 1974, the Safety, Health, and Welfare at Work Act 2005 (Ireland) & other legislation and interpret and apply them in the context of our activities.
- To devise and administer the effective implementation and maintenance of the Health & Safety management system.
- To provide the CEO and relevant senior managers with regular reports and data to demonstrate the effectiveness of the Health & Safety management system.
- To identify any legislative changes relevant to our activities and assess their implications.
- To inform the CEO of all legislative changes, weaknesses in the Health & Safety management system and significant health & safety incidents
- To communicate applicable Health, Safety & Welfare information from the HSE/HSA, safety organizations, trade associations etc. throughout the business
- To audit premises and activities on a periodical basis to assess compliance with the requirements of the Health & Safety management system.
- To respond to health and safety incidents in a timely manner and provide support, investigation, and analysis of each incident to prevent a re-occurrence.
- To continually improve and promote the Yellow Rules “safety culture”.

3.3 Health Safety Quality and Environmental Managers and **pHS** Compliance Safety, Quality and Technical team (SQTT) Manager

- To administer the effective implementation and maintenance of our Health & Safety management system in conjunction with the Group Quality, Environmental and Safety Manager and our employees at all levels
- Work with managers to ensure that all hazards have been identified, and risks assessed, on sites within their region.
- Support managers to evaluate the risks and ensure that there are adequate control measures in place to mitigate the identified risks.

- To identify all legal, international standards, and other health and safety requirements relating to their sites and ensure that all obligations are discharged.
 - To monitor and continually improve health and safety performance at their sites and provide Site/Departmental Managers and Directors with reports detailing best practice, findings, non-compliance, and recommendations for improvement.
 - To lead the investigation of all RIDDOR reportable incidents within their region, ensure that the root causes are identified and monitor the implementation and completion of corrective/preventative actions.
 - To provide on-site support within their region and advice to all members of staff on Health & Safety matters
 - To promote the “Yellow Rules Safety Culture”
- 3.4 Executive Team Members, Business Unit Managing Directors, and Functional Heads
- To understand the application and implications of the Health & Safety at Work Act 1974, the Safety, Health, and Welfare at Work Act 2005 (Ireland) and other legislation relevant to the activities of their division
 - To ensure that all relevant Health, Safety or Welfare information is communicated, understood, and implemented by all applicable employees within their division.
 - To ensure that all employees for which they are responsible adhere to the requirements of the Health & Safety management system.
 - To re-educate, coach or apply disciplinary processes to any employee that fails to adhere to the requirements of the Health & Safety management system depending on its severity.
 - To promote and embed the Yellow Rules “Safety Culture”.
- 3.5 Site/Departmental Managers
- To understand the application and implications of the Health & Safety at Work Act 1974, the Safety, Health, and Welfare at Work Act 2005 (Ireland) and other legislation relevant to their activities
 - To ensure that operations under their scope of responsibility are carried out in accordance with the requirements of the Health & Safety management system, thereby resulting in minimal risk to persons, equipment, and materials.
 - To bring relevant Health & Safety issues to the attention of senior management and the HSQE, **phs** Compliance SQTT managers
 - To ensure accidents and near miss incidents are thoroughly investigated and reported in appropriate timescales.
 - To co-operate with HSQE Regional Managers and phs Compliance SQTT manager during their visits and act upon the recommendations received
 - To ensure that all tasks have been suitably risk assessed.
 - To ensure all employees, contractors or visitors to site receive information, instruction, training, and supervision necessary to allow them to work in a safe manner.
 - To discipline any member of staff failing to comply with Health & Safety rules.
 - To promote and embed the Yellow Rules “Safety Culture”.
- 3.6 HSQE Representatives Forum
- To engage with our employees through our Viva Engage HSQE Page
 - To participate in the reporting of proactive HSQE observations

- To participate in the risk assessment process and assist in the development of safe practices of work.
- To assist in the investigation of incidents at their site
- To share and promote the Yellow Rules “Safety Culture” with their colleagues.

3.7 Employees

- To understand Health & Safety legislation relevant to their responsibilities and work activities
- To have a personal concern for the Health & Safety of themselves and of others
- To work in accordance with training, company procedures and equipment and H&S information provided and not to undertake any task if unauthorised or untrained.
- Not to intentionally or recklessly misuse or interfere with any item or piece of equipment provided for use.
- To report promptly any hazardous defects in plant or equipment, or shortcomings in Health & Safety systems
- To suggest improvements to work practices to improve safety performance.
- To actively participate in, and comply with, the Yellow Rules “Safety Culture”.

4 ARRANGEMENTS

4.1 Yellow Rules

We have a safety-first culture underpinned by our Yellow Rules. The Yellow Rules provide a simple outline of the safety expectations for every employee and enable our workforce to champion safety. The Yellow Rules are built on health and safety data which identify key risks, KPIs and mitigating actions. It is underpinned by a proactive approach utilising a right to challenge and near miss reporting processes. The Yellow Rules are led by all employees and are the corner stone of our safety culture.

4.2 Risk Assessment and Safe Systems of Work

In accordance with Regulation 3 of The Management of Health and Safety at Work Regulations and general duties under The Health and Safety at Work Act 1974 we will ensure that we make a suitable and sufficient assessment of all health and safety risks to which our employees are exposed whilst carrying out their duties. Risk assessments will also consider any third parties exposed to risk of injury or damage because of our undertakings.

Our managers, with responsibility for people, products, or infrastructure, will identify associated hazards, evaluate risks effectively and identify appropriate control measures to minimise their impact in accordance with the principles of prevention.

Safe systems of work (SSOW) will be developed from the risk assessments for all activities which represent significant risk to the health and safety of our workforce and any third parties. SSOW will detail how each work activity should be carried out to minimise the risk of harm or damage.

A SSOW is a statement prepared within the Company detailing how a work operation is to be carried out in a manner which is safe and presents minimal risk to health and safety. The SSOW enables people engaged in the operation to understand the hazards and risks associated with the work, to carry out their work in a safe manner and to implement control measures that reduce exposure to injury or ill health.

SSOW relating to activities/work will be maintained on site(s) for the duration of the work activities. The Site Manager will monitor the controls for effectiveness and amend the risk assessment and SSOW when significant hazards and risks are identified.

SSOW will enable the activities to be monitored by all persons concerned with health and safety.

4.3 Employee Health and Safety Consultation

We will consult and communicate with all its employees to promote safety awareness, safe working practices and identify any matters of concern regarding health and safety. This will be achieved locally at our sites, during site inspections and toolbox talks.

We will share our health and safety performance on quarterly company-wide webinars so employees can understand our performance and focus.

4.4 Workplace Provision and Welfare Facilities

In accordance with the Workplace (Health, Safety and Welfare) Regulations 1992, we will ensure that suitable and sufficient facilities are put in place to provide (so far as reasonably practicable) adequate welfare facilities for its staff and any visitors to its sites. These facilities will consist of suitable toilet and washroom facilities, the availability of clean drinking water, clean and hygienic areas for taking meal breaks/rest. Where staff are required to wear specialist clothing appropriate changing facilities will be provided.

All our facilities will be designed to maintain the welfare, health and safety of its employees and provide safe access & exit. Sites will be maintained in good order and will provide levels of light, heat, and ventilation appropriate for the type of work carried out.

4.4.1 Good Housekeeping

Everyone is responsible for keeping their work area clean and safe. Work areas are to be cleaned regularly in accordance with the type of work carried out and waste materials placed in waste receptacles immediately or stored neatly for transfer to receptacles as soon as practicable.

Accesses, walkways, stairs etc. will be clearly marked, kept clear of obstruction & contamination, and maintained in a suitable condition.

Periodic housekeeping inspections will be carried out to monitor site housekeeping practice and any circumstances or activities that could affect the safety of the work area should cease or be reported to the Site Manager.

4.4.2 Site Security

Where it is our responsibility, site management will ensure the establishment and maintenance of efficient security measures where fitted. This includes fencing, intruder alarms, gating, or other barrier to protect members of the public from gaining accidental or deliberate access to our site. Suitable notices will be posted warning of any specific site hazards.

Where fitted, fences and gates will be maintained secure, and gates kept closed unless access or exit is required. Suitable warning notices will be posted prominently.

4.5 Work Equipment

The Provision and use of Work Equipment Regulations 1998 (PUWER) (as amended) and various other specific legislation, e.g. the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) (as amended) specify the requirements for manufacture, use, inspection, testing, examination, maintenance, and relevant certificates for work equipment.

In accordance with the regulations, all work equipment will be suitable for its intended use and maintained in accordance with manufacturers guidelines. Where use of equipment may impose specific risks, information, instruction, and training will be given, and/or use of the equipment may be restricted to authorised persons.

The term “work equipment” covers all equipment used to carry out the work. This includes everything from hand tools through to vehicles and complex machinery that may be required to carry out the job.

All equipment used by our employees will be inspected, examined, tested, and certificated in accordance with any applicable legal requirements as appropriate. Where equipment is hired-in, we will ensure that the hire company provide instructions for its use and documentation indicating that it is safe for use. All paperwork will be retained on site in accordance with the retention requirements specified by the relevant legislation.

Persons who operate or work with equipment will be authorised, competent and in possession of the relevant licences or certificates.

4.5.1 Use of Portable and Handheld Electrical Equipment

All equipment will be kept in a safe condition and well-maintained. Where relevant, equipment will be subject to periodic testing. Guards and side handles will be used where provided.

Where hazardous equipment is identified that has specific competency requirements, the Company will ensure that sufficient training and resources are allocated to ensure that the relevant competencies are achieved.

4.5.2 Lifting Operations and Equipment

All lifting equipment will be inspected by a competent person before use and during use, at intervals specific to relevant legal requirements. Inspections will be recorded, and no equipment shall be put into use without the appropriate safety inspection being carried out.

Where equipment is hired-in, we will ensure that the hire company provides instructions for use and documentation indicating that it is safe for use. All paperwork will be retained on site in accordance with the retention requirements specified by the relevant legislation.

If any equipment is damaged during lifting operations, it will be immediately taken out of service and returned with details of damage to the site or hirer as applicable.

Lifting operations will only be carried out where a risk assessment and safe systems of work has been put in place. A competent person will ensure the following areas are covered and included where necessary:

- Thorough planning of the operation, along with the selection, provision, and use of suitable equipment
- Any necessary preparation of the site including erection and dismantling of equipment.
- Ensure that all equipment has been maintained, tested, and examined as necessary.
- Ensure operation of all equipment is by competent and trained people.

- Supervision of the lift by trained and competent people, with the authority to progress and stop the job as necessary.
- Ensure effective means of communication between all members of staff during the lifting operation.
- Ensure the safety of all people involved in the lifting operation and those not involved.

4.6 Manual Handling

In accordance with The Manual Handling Operations Regulations 1992 (as amended) and we will ensure that a specific risk assessment is produced for activities that involve significant manual handling. In this context, manual handling includes but is not limited to lifting, carrying, pushing, pulling, and holding.

The risk assessment will identify factors that could result in injury, such as heavy or unstable loads, the need to lift from the floor or above shoulder height, the need to twist, stretch or stoop while manual handling.

Action will be taken to eliminate factors that could cause injury. Where possible, manual handling activities will be avoided or reduced by providing mechanical aids such as trolleys, and re-designing work operations.

All staff required to carry out manual handling will receive training in safe handling techniques.

4.7 Personal Protective Equipment (PPE)

In accordance with the Personal Protective Equipment at Work Regulations 1992, we will ensure that suitable PPE conforming to relevant standards is provided free of charge to any employees carrying out work activities which may expose them to residual risk.

We will use the risk assessment process as a means of identifying the PPE requirements for the task, but we recognise that specifying PPE is a last resort for protection against hazards.

We maintain procedures for the issue, storage, inspection, and maintenance of PPE and will ensure that employees are provided with information, instruction, and training in relation to the PPE provided to them.

Where specific testing and inspection of PPE is required, this will be carried out and recorded by a competent person.

Employee are expected to use PPE in accordance with manufacturer's instructions and ensure that PPE is not misused or used for purposes for which it was not intended.

4.8 Fire Precautions

In accordance with the Regulatory Reform (Fire Safety) Order 2005, we will appoint a responsible and competent person(s) to produce fire risk assessments at its sites to identify potential fire hazards, evaluate the associated risks and determine suitable control measures. Fire risk assessments will be communicated to all members of staff and displayed in a prominent position with each site.

All sites will be organised and maintained in a manner which minimises the opportunity for fires to start and spread and will be equipped with fire-fighting equipment, alarms, emergency lighting and safety signage as necessary. All equipment will be regularly inspected at least once per annum and appropriate records maintained.

Flammable materials and substances are to be stored, handled, transported, and used in accordance with the supplier's recommendations and minimum working quantities will be maintained on site.

Every site will maintain an emergency evacuation plan detailing their procedures for a safe and orderly evacuation in the event of a fire and responsibilities will be clearly defined. Fire drills will be held at 6 monthly intervals to evaluate the effectiveness of the emergency evacuation plan and appropriate action taken where necessary.

Where a person may have difficulty in using the ordinary means of escape due to a disability or injury (either permanent or temporary) a personal emergency evacuation plan (PEEP) will be developed with their input and communicated to the responsible person on site and any fire marshals.

4.9 Substances Hazardous to Health

In accordance with the Control of Substances Hazardous to Health (COSHH) Regulations 2002, we will ensure that it has arrangements in place to assess the exposure of its employees (and other persons) to hazardous substances and take appropriate steps to avoid or control the exposure.

These arrangements will cover not only substances but also exposure to dusts emitted by work processes, and biological hazards such as Legionella.

All substances with the potential to be hazardous to health will be identified, assessed and where relevant a Material Safety Data Sheets (MSDS) will be obtained from the manufacturer.

A COSHH assessment will be completed for all hazardous substances that identifies how and when they will be used and how exposure will be minimised. The assessment will also identify storage requirements, emergency measures, transportation requirements (dangerous goods) and any PPE that should be worn during its use.

4.10 First Aid

In accordance with the Health and Safety (First Aid) Regulations 1981 we will ensure the provision of adequate first aid for all its employees and any visitors to its sites. This will be carried out through the risk assessment process to ensure that suitable and sufficient first aid provisions are in place.

We endeavour to have first aid cover at all sites during operating hours. First aiders are trained to a HSE or HAS recognised qualification for first aid at work.

In addition, all our sites will maintain at least one regularly inspected first aid kit and ensure that any peripatetic workers are issued with their own first aid box when conducting duties off site.

4.11 Accident Investigation, Reporting and Recording

We have developed systems that promote and encourage reporting of incidents and near misses. All reported incidents are evaluated and fully investigated (where necessary) to identify their root cause and eliminate the potential for re-occurrence.

In accordance with the Social Security (Claims and Payments) Regulations 1987, we will ensure that there is a B1510 accident book available on all its sites to record any accidents and dangerous occurrences.

Any serious accidents, incidents, and diseases within the scope of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) will be submitted online to the relevant Health and Safety enforcement agency.

Our HSQE Team will monitor accident frequency and severity both onsite and offsite to identify trends and implement proactive measures to minimise the likelihood of injuries to our employees and any third parties affected by our undertakings.

4.12 Display Screen Equipment

In accordance with the Health & Safety (Display Screen Equipment) Regulations 1992, we have made DSE training and assessment available to all personnel who are regular DSE users. This interactive training provides all information, instruction, and training, including a risk assessment to identify any hazards and risks associated with their workstation.

We will take all reasonable measures to reduce these risks including the provision of appropriate equipment and work breaks.

Where a member of staff is identified as display screen users. We will make them aware of the entitlement to a free eye care voucher to cover the cost of an eye test. If the eye test identifies that a prescription is specifically required for display screen use. We will provide a further voucher to cover the cost.

4.13 Smoking

In accordance with The Smoke free (Premises and Enforcement) Regulations 2006, smoking is prohibited in all Company and client premises, those persons wishing to smoke must do so in designated outdoor areas. All our employees will be required to comply with the site smoking procedures of its customers and any other buildings they visit in the course of their duties.

Company vehicles are regarded as workplaces and smoking in Company vehicles is prohibited.

In accordance with The Smoke Free (Signs) Regulations 2012 appropriate “No Smoking” signs will be displayed within premises and Company vehicles.

We recognise that electronic cigarettes may offer a safer alternative to smoking a traditional cigarette, however, there will be no distinction between either method on our sites and all smoking will be subject to the same rules.

4.14 Migrant Workers

In accordance with the Health and Safety at Work Act 1974, we have a duty to ensure the safety of all employees whatever their nationality or language skills.

We expect all employees to be able to communicate proficiently in workplace English (for the UK and Ireland) and Spanish (for Spain) and the company endeavours to recruit staff with this skill. Migrant workers may have some difficulty speaking, reading, and understanding the English or Spanish language. Workers with weaker communication skills present an increased risk and will therefore be provided with information, instruction and training they need to work safely. Managers/supervisors must be satisfied that the person has fully understood any information, instruction and training received.

Migrant workers with poor local language skills will not be permitted to work on operational sites until the following steps have been put into place:

- They have completed a site safety induction and are able to demonstrate that they understand the site rules.
- They can demonstrate that they have understood all Risk Assessments/Method Statements applicable to their work activities and the control measures put in place to minimise the potential for injury.
- They can demonstrate that they can communicate with Supervisors, colleagues or other site management and follow instructions.

4.15 Noise

In accordance with the Control of Noise at Work Regulations 2005, we will ensure that noise levels associated with its employee's activities are periodically assessed by a competent person. Where the levels of noise are identified as presenting a risk of damage to employee hearing and the wider environment, all reasonably practicable measures will be taken to reduce noise levels.

Personnel will be supplied with, and be required to wear, appropriate hearing protection where residual levels constitute a hazard and provided with information and instruction in relation to its use.

Where employees are exposed to high and sustained levels of noise, periodical health surveillance will be carried out to verify that employees hearing is not being damaged.

4.16 Vibration

In accordance with the Control of Vibration at Work Regulations 2005, we will ensure that hand arm and whole-body vibrations levels associated with its employee's activities are periodically assessed to identify whether exposure levels are detrimental to its employee's health. Where the levels of vibration are identified as presenting a risk to employee health all reasonably practicable measures will be taken to reduce vibration levels.

Personnel will be supplied with, and be required to wear, appropriate PPE where residual levels constitute a hazard and given information and instruction in relation to its use.

Where employees are exposed to high and sustained levels of vibration, periodical health surveillance will be carried out to verify that employees are not developing chronic conditions.

4.17 Electricity at Work

In accordance with Electricity at Work Regulations 1989 (as amended), we will only appoint competent people to work on or near electricity. Where there is a risk of people encountering electricity then a risk assessment will be carried out and control measures put in place prior to the work commencing. This will be supported by a SSOW and the issue of a Permit to Work when the activity is carried out one of our sites.

All portable equipment used by our employees either at our own sites or on our customer's sites will be subject to a portable appliance test by an appropriately qualified person and any items identified as defective removed from service immediately.

4.18 Dust and Fumes

Where our employees are exposed to dust or fume-filled atmospheres whilst carrying out their work activities a risk assessment will be carried out to identify whether exposure levels are detrimental to its employee's health. Where the levels of dust or fumes are identified as presenting a risk to employee health all reasonably practicable measures will be taken to reduce exposure.

Personnel will be supplied with, and be required to wear, appropriate PPE where residual levels constitute a hazard and given information and instruction in relation to its use.

Where employees are exposed to high and sustained levels of dust or fumes, periodical health surveillance will be carried out to verify that employees are not developing chronic conditions.

4.19 Asbestos

In accordance with the Control of Asbestos Regulations 2012, we will utilise a consultant to provide a competent person to assess its premises, identify the location and condition of any asbestos present and carry out a risk assessment.

we will ensure appropriate control measures are put in place to control asbestos identified on its sites and make any persons that work on its premises aware of its location and condition.

Where our employees work off site and asbestos are discovered (or suspected), work will immediately cease and the matter will be brought to the attention of the site manager.

4.20 Confined Spaces

In accordance with the Confined Spaces Regulations 1997 (as amended), we will carry out a risk assessment of the work activity and the work environment to ensure that when working in confined spaces cannot be avoided adequate controls are put in place in place via a suitable SSOW. Precautionary measures and rescue procedures will also be produced as required by a competent person.

Work equipment will be assessed for suitability for use in the specific environment/atmosphere and a permit to work issued prior to the commencement of any works.

Persons working in confined spaces will be trained in the relevant precautionary measures and rescue procedures relevant to the activity carried out.

4.21 Working at Height

In accordance with the Work at Height Regulations 2005 (as amended), we will carry out risk assessments on all work at height activities to ensure that all reasonably practicable controls are in place prior to starting the work. As part of the risk assessment Site Managers will ensure that:

- Working at height is avoided where possible.
- All work at height is properly planned and appropriately supervised.
- Those working at height are competent and appropriately trained.
- Work at height equipment is inspected and maintained in accordance with legal requirements.
- The place where work is carried out at height is safe.
- The risk from fragile surfaces is controlled.
- The risk of falling objects is controlled.
- Equipment for working at heights is appropriate and suitably inspected and maintained.
- Controls are in place to ensure the safety of employees in adverse weather conditions.
- Procedures are in place to facilitate rescue in the event of an emergency.

When all factors have been considered through the risk assessment process, then it will be the responsibility of the person planning the work to identify the safest working procedure for the activity and produce a SSOW.

4.22 Lone and remote Working Arrangements

We recognise the enhanced risk that lone working and remote working presents and will ensure that a risk assessment is completed to identify potential hazards and implement control measures that will reduce the likelihood of injury to our employees.

In our industry lone working cannot be avoided so we have invested significantly in tracking and trace technologies to ensure we are aware of our employee's progress around their planned routes. The systems can be monitored to confirm employee safety.

All lone workers are provided with a mobile tele-communications device and a SSOW relevant to the activities that they carry out.

Risks are reduced due to our routes and vehicles being highly visible; an incident that prevented communications would likely be identified by the public.

Remote workers are all informed of the risks and methods to maintain communications and line managers of remote workers maintain contact by phone and e mail. All remote workers and lone workers have at least 1 communications device or tracker.

4.23 Drugs and Alcohol

We have a zero-tolerance approach regarding the use of drugs and alcohol in the workplace. This will help to ensure the health and safety of its employees and others with whom they may come into contact during their duties.

As a result, all employees and contractors working on behalf of us will not:

- Report or try to report for work when unfit due to substance, alcohol or drugs abuse (whether illegal or not)
- Consume or possess alcohol in the workplace.
- Consume or be in possession or be under the influence of illegal drugs in the workplace.
- Undertake abuse of any substance whilst at the workplace (It should be noted that this can include both prescription and non-prescription medicines, which may impair the individual's ability to drive or operate machinery safely)

For additional information please refer to the Company's Drugs and Alcohol Policy.

4.24 Young Persons

We recognise that Young Persons (Employees under the age of 18) may be exposed to additional risks in the workplace. To maintain their safety, we will ensure that:

- personal risk assessments are completed for all activities and hazards to which young persons are exposed.
- sufficient information, training and guidance is provided to all young persons in order that they understand the risks to their health and how to avoid them.
- young persons are supervised by a competent person.

4.25 New and Expectant Mothers

We recognise that new and expectant mothers are more sensitive to hazards in the workplace and that those hazards can have a greater impact on both the mother and the unborn child. To maintain their safety, we will ensure that:

- we provide a safe workplace that as far as reasonably practicable reduces the risk of injury to expectant mothers and their unborn children.
- personal risk assessments are completed for all activities and hazards to which expectant mothers are exposed.
- where the level of risk is greater than that to be expected outside the workplace, we will temporarily adjust the working conditions, offer suitable alternative work or suspend employees from work on full pay.

4.26 Construction Projects

Construction (Design and Management) Regulations 2015 (CDM 2015) is applicable to us, as electrical installations and maintenance are classed as construction work activities. As a result of these construction activities, we will never be the principal contractor or designer, but may conduct works that are defined in the regulations as construction work. When this is the case, our contractors on all projects must:

- make sure the client is aware of the client duties under CDM 2015 before any work starts.
- plan, manage and monitor all work carried out by themselves and their workers, considering the risks to anyone who might be affected by it (including members of the public) and the measures needed to protect them.
- check that all workers they employ or appoint have the skills, knowledge, training and experience to carry out the work, or are in the process of obtaining them.
- make sure that all workers under their control have a suitable, site-specific induction, unless this has already been provided by the principal contractor.
- provide appropriate supervision, information and instructions to workers under their control.
- ensure they do not start work on site unless reasonable steps have been taken to prevent unauthorised access.
- ensure suitable welfare facilities are provided from the start for workers under their control and maintain them throughout the work.

Where required, we will comply with the principal contractor requirements and ensure inductions, hazards, risks, and the mitigation plans are fully understood.

In any case where CDM applies at our sites for refurbishment or larger construction tasks, the group safety team would appoint competent CDM designers and contractors.

4.27 Accountability

We recognise that deviation from legal requirements, this policy, or safe operation, can cause serious harm. To ensure the policy is adhered to, the group compliance disciplinary policy is used to enforce any unsafe actions of a negligent or deliberate nature.