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# 1. Policy Statement of Intent

The latest ISG Health & Safety Policy statement of intent forms part of the Code of Ethics and can be found on the ISG website: www.isgltd.com

This policy is reviewed annually and is signed by the Chief Executive Officer.

# ISG is a global construction specialist, delivering places where people and businesses thrive.



# Health and safety

This is an extract of page eight of ISG's 'Code of ethics and business conduct - June 2023'. (Click here to view the full copy of the code)

At ISG, we are committed to providing a safe and healthy working environment where risks to our employees, contractors and visitors to our premises and projects are minimised. We will ensure a suitable and sufficient provision of welfare facilities at work, as far as it is practicable.

To implement our statement – and to comply with our legal obligations – we have developed processes and procedures that are contained within management systems. In the UK and several other countries in which ISG operates, these processes and procedures have been certified as meeting the requirements of ISO 45001. We set, develop and maintain company health and safety standards that apply throughout our global business.

Adherence to such management systems will ensure that:

- we maintain our focus on excellence in safety being about the presence of positives and not just the absence of negatives
- we take all reasonable steps to minimise accidents and incidents of ill health to our employees, clients, supply chain, third parties, visitors and members of the public

- we provide, so far as is reasonably practicable, adequate control of the health and safety risks arising from our work and associated activities
- we are committed to ensuring full compliance with our legal obligations and all current health and safety legislation in respect of our business activities
- we will strive to lead industry best practice and will demonstrate adherence to our clients' health and safety requirements
- information, instruction and training is provided to our employees that is appropriate to their roles and responsibilities within the organisation
- we encourage and actively promote health and safety innovation, best practice and improvement initiatives, through the involvement of our people, subcontractors and management systems
- suitable and sufficient resources are given to health, safety and welfare across all levels of the business
- we regularly consult and communicate to our people on health and safety issues and listen when feedback is given

- we create and maintain a positive health and safety culture and ensure that it is our highest priority across all levels of the business
- systems are in place to regularly monitor and review our health and safety performance
- we strive to continuously improve our operating systems, standards of compliance and our safety performance
- various key performance indicators (KPIs) are used to provide visibility on where improvements may be needed. Such KPI data is regularly reviewed by the ISG Statutory Board.

We regularly review our procedures to ensure they are appropriate to the nature and scale of our occupational health and safety risks, and remain relevant and appropriate to the purposes of the

Matt Blowers Chief Executive Officer

January 2024

#### 2. Introduction

2.1 ISG is striving to create a positive and inclusive working environment and culture, providing the conditions for individuals and teams to thrive and achieve the highest standard of performance and service, where contributions are fully recognised and valued by all. This is a key part of our company Strategy 'Right thing first'.

For an international organisation the size and complexity of ISG, it is imperative that an effective and unambiguous operational framework is in place to ensure that Health and Safety issues are tackled in a planned and co-ordinated manner. This Health and Safety policy details the framework for the organisation and management of Health and Safety issues within ISG.

2.2 This policy has been written to confirm ISG's standards regarding Health and Safety, and the responsibilities of different individuals within the organisation to ensure adherence to it. A focus within the policy has been placed on UK regulations and procedural requirements, which is where the majority of the group's business is located. However, ISG operates in 20+ countries around the world; it is acknowledged that for other jurisdictions in which ISG carry on business, specific local Health and Safety compliance obligations may also exist, on a country by country basis. In such instances, additional local policies and procedures may be required to supplement this overarching (but UK focused) group policy.

Where local variations are necessary, the Managing Director of each non-UK business shall be responsible for ensuring that such arrangements are accurately recorded via a separate policy (or an addendum to this policy), in conjunction with their Health and Safety Departmental Leads. The Group Health and Safety Director will carry out a regular review of such local policies to ensure they are of a similar standard to the UK template.

- 2.3 The nature of ISG's work within the Construction Industry means that there may be some Health and Safety risks to ISG staff, contractors, project visitors and members of the public. This policy details how ISG will prevent or manage such risks to ensure the Health and Safety of all individuals affected by ISG's undertaking.
- 2.4 In order to do this, ISG, its managers and staff, must know their responsibilities for the management of Health and Safety related risks and hazards and are expected to fully comply with all ISG's Health and Safety policies and procedures, whilst working for ISG.
- 2.5 ISG staff have an obligation to comply with ISG processes and procedures that allow ISG to fulfil its legal obligations. Members of staff who fail to fulfil or discharge their responsibilities satisfactorily may be subject to disciplinary action.
- 2.6 This policy applies to all people who perform services for or on behalf of ISG (including all full and part-time employees, all Directors, all agency staff/contractors and all persons employed by all group companies). Failure to comply with this policy will be treated as a very serious matter and, for employees, a disciplinary matter.

# 3. **Definitions**

- 3.1 Health and Safety: Organised efforts and procedures for identifying workplace hazards and reducing accidents and exposure to harmful situations and substances. It also includes training of staff in accident prevention, accident response, emergency preparedness and the use of protective clothing.
- 3.2 Hazard: Something with the potential to cause harm.
- 3.3 Risk: The likelihood of that harm occurring.
- 3.4 ISG: Any subsidiary company operating under or reporting into ISG plc.
- 3.5 Company Directors: A Director within ISG or an ISG subsidiary company, whether a Statutory Director or a person with Director in their job title.
- 3. 6 Account Lead: A person with operational lead allocated to a Client or workstream.
- 3.7 ISG employee / ISG staff: Any person working for or on behalf of ISG, including direct- employees, self-employed persons, agency staff, volunteers or freelancers.

3.8 Contractor: means any person who, in the course or furtherance of a business, carries out, manages or controls work for ISG.

## 4. Scope of the policy

- 4.1 The contents and requirements of this policy are applicable to:
  - All employees of ISG as defined in para 3.7
  - Suppliers working on ISG premises:
  - Contractors and their employees /representatives who have been engaged to work on ISG projects;
  - All visitors to ISG premises.
- 4.2 This policy covers general Health and Safety issues and ISG have distinct policies covering other operational topics.

## 5. Purpose of the policy

- 5.1 The Health and Safety of anyone affected by the work of ISG is a responsibility that is taken extremely seriously. This document sets out ISG's policy for protecting the Health and Safety of anyone working on ISG projects, ISG premises and any visitors or members of the public who may be affected by ISG's undertaking, thus complying with the requirements of the Health and safety at Work etc. Act 1974, and all other relevant Health and Safety legislation.
- 5.2 This policy details the arrangements for the management and application of Health and Safety practices at ISG to ensure a coordinated, systematic and focused approach.
- 5.3 The policy makes explicit the responsibilities of the ISG Statutory Board, Chief Operating Officer, Group Health and Safety Director, Managing Directors, all Directors, Account Leads, Departmental and Functional Heads, HSE Managers and Advisors, Managers, Surveyors and Commercial Staff, Estimators, Bid Managers, Planners, Engineers, Foreman and Supervisors, directly employed Operatives and ISG Office Staff/any other staff within ISG, to ensure adequate and effective management of Health and Safety.
- 5.4 This policy must be read and implemented in conjunction with other ISG policies and procedures. These provide more detailed guidance on specific Health and Safety issues.

## 6. Arrangements to deliver this policy

This policy will be delivered by:

- The development of procedures, protocols and guidance that meet the requirements of Health and Safety law as applicable to ISG which will be made available via the staff intranet (Workspace).
- Ensuring management conduct suitable and sufficient risk assessments and controls for their areas of responsibility;
- The provision of appropriate Health and Safety training and access to advice where required;
- Providing staff with the appropriate tools and equipment for their jobs;
- · Putting in preventative and protective measures;
- Consulting workforce on matters relating to Health and Safety.
- To implement emergency procedures
- Providing clear instructions and information, and adequate training, to ensure employees are competent to do their work;

# 7. Responsibilities

# 7.1 ISG Statutory Board

Initiate ISG's policy for the prevention of injury, ill-health, damage and wastage and set targets for the continuous improvement of Safety and Health.

To administer the policy by:

Receiving regular reports on the Health and Safety performance and actions of contractors.

- Knowing the requirements of the Health and Safety at Work Act 1974, The Management of Health and Safety at Work Regulations 1999 and other supporting regulations and ensure that they are complied with throughout ISG.
- · Knowing the legal requirements and standards relating to the products and services being delivered.
- Arranging procedures to implement new and changed legal requirements and to consider other external developments and events.
- Agreeing and establishing an appropriate number of Health and Safety objectives and targets (KPI's) with the Board and Chief Operations Officers. The KPI's will be set to measure performance and demonstrate continual improvement.
- Reviewing ISG's Management Systems (CMS) in conjunction with the relevant Chief Operating Officer, Managing Directors and Group Health and Safety Director on a 12 monthly basis to assess its ongoing suitability, adequacy and effectiveness.
- Ensuring that all levels of staff receive adequate and appropriate training to enable them to gain the skills and knowledge, and ultimately the competence, to carry out their work safely and without risk to their health.
- Insisting that good working practices and behaviours be regularly observed and adhered to.
- Appointing one or more competent Employees and Contractors to help them implement the measures
  needed to take to comply with the legal requirements. Ensuring that recorded Health and Safety
  inspections of site conditions and audits of the implementation of the ISG management system are carried
  out
- Arranging for periodic audits of the effectiveness of management structures and risk controls for Health and Safety are carried out.
- Making certain that during tendering, at planning stages and during the pre-construction stage that
  allowance is made for safe systems of work to be implemented, adequate welfare facilities and equipment
  provided to avoid injury, damage and wastage and that sufficient resources are available to deliver works
  to the client's specification and in accordance with ISG best practice, management systems and company
  standards.
- Providing and maintaining safe plant, equipment and machinery (where relevant);
- Instituting proper and timely incident and accident reporting, investigation and costing of injury, damage and loss procedures, promoting action to prevent recurrence and initiating analysis to discover accident trends.
- Disciplining any members of staff, trade contractors or suppliers failing to discharge satisfactorily the responsibilities allocated to them.
- Instigating liaison with external accident prevention organisations; encouraging the distribution of pertinent information throughout the company.
- Arranging for funds and facilities to meet requirements of this policy.
- Setting a personal example and provide positive Health and Safety leadership from the Boardroom.
- Ensuring Health and Safety is considered as part of ISG's corporate governance and KPI's on safety performance are set and monitored.
- Ensuring competent Health and Safety advice is available and obtained where necessary.
- Ensuring suitable and sufficient risk assessments are carried out.

- Ensuring employees or their representatives are involved in decisions that affect their Health, Safety and welfare.
- Giving appropriate weight to reporting both preventive information (such as progress of training and maintenance programmes) and incident data (such as accident and sickness absence rates).
- The Board will appoint a Health and Safety Champion at Board level and for Executive Committee meetings.

#### 7.2 Chief Operating Officer

The Chief Operating Officer (COO) has delegated responsibility from the Chief Executive to ensure this policy and associated procedures, protocols, guidance and management systems are fully understood, applied and resourced within their respective areas of responsibility and associated business units, by the relevant Managing Directors. The COO should also provide leadership by example and proactively promote responsible attitudes towards health and safety by:

- Understanding ISG's policy and the requirements of the Health & Safety at work etc Act 1974, The
  Management of Health and Safety at Work Regulations 1999 and other relevant legislation. Appreciate the
  responsibilities allocated to each employee; and supply adequate support, resource and monitoring to
  ensure compliance.
- Ensuring that suitable and sufficient risk assessments are undertaken, records made as required and significant risks reduced to an appropriate level prior to work starting.
- Ensuring that tenders have sufficient provision for safe systems of work and adequate equipment and
  resources are made available for the Health and Safety of employees and those who may be affected by
  ISG works.
- Ensuring that sufficient resources are allocated at planning stage for the most appropriate order of working, with adequate welfare facilities provided.
- Ensuring that a documented program of works is prepared explaining sequence of operation, outlining hazards and indicating precautions to be adopted.
- Ensuring that sufficient resources are allocated at planning stage for the most appropriate order of working, to avoid Health and Safety incidents.
- Ensuring that sufficient resources are allocated at planning stage to allow the successful delivery of risk assessments and other bespoke Health and Safety management schemes as required by the contract.
- Ensuring that sufficient resources are allocated at planning stage for the most appropriate order of working, to deliver the project in accordance with ISG procedures, with relevant legal requirements and industry standards and that sufficient resources are available to deliver works to the client's specification and in accordance with ISG best practice, management systems and company standards.
- Setting a high standard of personal Health and Safety at all times on all company premises and projects.
- Ensuring the completion of recorded Health and Safety inspections, systems audits and Directors Safety Leadership Tours of site conditions and other company premises as defined in the ISG Company Management System (CMS).
- Ensuring adequate supervision is available to co-ordinate Health & Safety, management activities between Main Contractor, Sub- contractor and any other contractors working on the same site.
- Fully supporting the Health and Safety Departments in the execution of their duties.
- Instigate investigations into major site accidents (including over 7-day injuries), incidents and Dangerous
  Occurrences and Significant Events to establish immediate and root causes and prevention measures.
  Ensure that investigations are carried out in accordance with company procedures. Ensure cooperation with
  external investigations of accidents/incidents and ensure that any recommendations for prevention are

implemented.

- Ensuring that all staff are given a company induction within their first 90 days of employment within ISG.
- Providing or arrange for adequate training at all levels through the organisation to enable specific duties to be carried out in accordance with relevant Health and Safety legislation.
- Ensuring communication links are maintained to increase awareness of Health and Safety matters.
- Setting a personal example and provide positive Health and Safety leadership.
- Ensuring the objectives of the company KPI's are met and maintained.
- here non-compliance of statutory requirements or company procedures is evident, ensuring the company disciplinary procedures for both employees and contractors are implemented.
- Ensuring that Managing Directors and project delivery teams have the correct levels of knowledge, skills and
  experience and disciplines to enable safe system of works to be implemented without harm to the ISG staff,
  contractors and the general public.
- Receiving regular reports on the Health and Safety performance and actions of their business units and associated contractors.
- Ensuring employees or their representatives are involved in decisions that affect their Health, Safety and welfare.
- Effectively monitoring of sickness absence and workplace health can alert the board to underlying problems.

## 7.3 Group Health and Safety Director

Is responsible for initiating the company's policy to prevent injury, ill-health, damage and wastage, to audit and set targets for the continuous improvement of Safety and Health.

To administer the policy by:

- Knowing the requirements of the Health and Safety at Work Act 1974, The Management of Health and Safety at Work Regulations 1999 and other supporting regulations and ensure that they are observed throughout ISG.
- Knowing the legal requirements and standards relating to the products and services being delivered.
- Agreeing and establishing an appropriate number of Health and Safety objectives and targets (KPI's) with the ISG Statutory Board and Chief Operating Officers. The KPI's will be set by the Board to measure performance and demonstrate continual improvement.
- Arranging for periodic audits of the effectiveness of management structures and risk controls for Health and Safety are carried out.
- Reviewing ISG's Management System/s (CMS etc) in conjunction with the ISG Statutory Board, Chief Operating Officer Operations Board, and Heads of Health and safety, Health and Safety Leads on a 12 monthly basis to assess its ongoing suitability, adequacy and effectiveness.
- Ensuring that all levels of staff receive adequate and appropriate training to enable them to fulfil the terms
  of their employment.
- Insisting that good working practices and behaviours are regularly observed.
- Ensuring that recorded Health and Safety inspections of site conditions and audits of the implementation of the ISG management system are carried out.

- Making certain that during tendering, at planning stages and during the pre-construction stage that
  allowance is made for safe systems of work to be implemented, adequate welfare facilities and equipment
  to avoid injury, damage and wastage and that sufficient resources are available to deliver works to the
  client's specification and in accordance with ISG best practice, management systems and company
  standards.
- Instituting proper and timely incident and accident reporting, investigation and costing of injury damage and loss procedures, promoting action to prevent recurrence and initiating analysis to discover accident trends.
- Receiving regular reports on the Health and Safety performance and actions of contractors.
- Disciplining any members of staff or sub-contractors failing to discharge satisfactorily the responsibilities allocated to them.
- Instigating liaison with external accident prevention organisations; encouraging the distribution of pertinent information throughout the company.
- Arranging for funds and facilities to meet requirements of the policy.
- Setting a personal example and provide positive Health and Safety leadership.
- Monitoring the impact of changes such as the introduction of new procedures, work processes or products, or any major health and safety failure, is reported as soon as possible to the board.
- Collecting workplace Health and Safety data to allow the board to benchmark performance against others in the sector.
- Overseeing the employee consultation process on Health and safety.
- Ensuring competent Health and Safety advice is available and obtained where necessary.
- Ensuring suitable and sufficient risk assessments are carried out.
- Ensuring employees or their representatives are involved in decisions that affect their Health, Safety and Welfare.
- 7.4 All Managing Directors, Company Directors and Account Leads

All ISG Directors have delegated responsibility from the Chief Executive and Chief Operating Officer to ensure this policy and associated procedures, protocols, guidance and management systems are fully understood, applied and resourced within their respective areas of responsibility. They should also provide leadership by example and proactively promote responsible attitudes towards Health and Safety by:

- Understanding ISG's policy and the requirements of the Health & Safety at work etc Act 1974, The
  Management of Health and Safety at Work Regulations 1999 and other relevant legislation. Appreciate the
  responsibilities allocated to each employee; and supply adequate support, resource and monitoring to ensure
  compliance.
- Ensuring that suitable and sufficient risk assessments are undertaken, records made as required and significant risks reduced to an appropriate level prior to work starting.
- Ensuring that tenders have sufficient provision for safe systems of work and adequate equipment and
  resources are made available for the Health and Safety of employees and those who may be affected by ISG
  works.
- Ensuring that sufficient resources are allocated at planning stage for the most appropriate order of working, with adequate welfare facilities provided.

- Ensuring that a documented program of works is prepared explaining sequence of operation, outlining hazards
  and indicating precautions to be adopted.
- Ensuring that sufficient resources are allocated at planning stage for the most appropriate order of working, to avoid Health and Safety incidents.
- Ensuring that sufficient resources are allocated at planning stage to allow the successful delivery of risk assessments and other bespoke Health and Safety management schemes as required by the contract.
- Ensuring that sufficient resources are allocated at planning stage for the most appropriate order of working, to
  deliver the project in accordance with ISG procedures, with relevant legal requirements and industry standards
  and that sufficient resources are available to deliver works to the client's specification and in accordance with
  ISG best practice, management systems and company standards.
- Setting a high standard of personal Health and Safety at all times on all company premises and projects.
- Ensuring the completion of recorded Health and Safety inspections, systems audits and Directors Safety
  Leadership Tours of site conditions and other company premises as defined in the ISG Group of Companies
  Management System (CMS).
- Ensuring adequate supervision is available to co-ordinate Health & Safety, management activities between Main Contractor, Sub- contractor and any other contractors working on the same site.
- Fully supporting the Health and Safety Departments in the execution of their duties.
- Instigate investigations into major site accidents (including over 7-day injuries), incidents and Dangerous
  Occurrences and Significant Events to establish immediate and root causes and prevention measures. Ensure
  that investigations are carried out in accordance with company procedures. Co-operate with external
  investigations of accidents/incidents and ensure that any recommendations for prevention are implemented.
- Ensuring that all staff are given a company induction within their first 90 days of employment within ISG.
- Providing or arrange for adequate training at all levels through the organisation to enable specific duties to be carried out in accordance with relevant Health and Safety legislation.
- Ensuring communication links are maintained to increase awareness of Health and Safety matters.
- Setting a personal example and provide positive Health and Safety leadership.
- Undertaking Directors Safety Leadership Tours at intervals highlighted within the ISG Group of Companies Management Systems (CMS).
- Ensuring the objectives of the company KPI's are met and maintained.
- Where non-compliance of statutory requirements or company procedures is evident, ensuring the company disciplinary procedures for both employees and contractors are implemented.
- Ensuring that project delivery teams have the correct levels of knowledge, skills and experience and disciplines
  to enable safe system of works to be implemented without harm to the ISG staff, contractors and the general
  public.
- Receiving regular reports on the Health and Safety performance and actions of contractors.
- Ensuring employees or their representatives are involved in decisions that affect their Health, Safety and Welfare.
- Effectively monitoring of sickness absence and workplace health can alert the board to underlying problems.
- 7.5 Health and Safety Departmental Leads & Function Heads

The appointed Health and Safety Departmental Leads & Function Heads shall report to the relevant Chief Operating Officer and be accountable to the ISG Group Health and Safety Director. They have delegated

responsibility from the ISG Group Health and Safety Director to ensure this policy and associated procedures, protocols, guidance and management systems are fully understood, applied and resourced within their respective areas of responsibility. They will have responsibility for coordinating the overall Health and Safety management program, and shall also be responsible for the issue, updating and communication of all project related Health and Safety statutory, administrative and procedural documentation.

The Departmental Heads and Functional Heads shall:

- Assist the Directors in developing a strategy and promoting a Health and Safety culture of continuous improvement within ISG on all Health and Safety related matters.
- Advise the ISG Group Health and Safety Director on any issues which may foreseeably influence the overall Health and Safety program.
- By agreement of the board, review and, where necessary, develop systems, KPI's, procedures, controls
  and monitoring standards to maintain legal compliance and to further promote the Health and Safety
  management program.
- Circulate relevant Health and Safety management related information and instructions to the respective Directors/Senior Managers and Health and Safety teams charged with special responsibility for implementing the Health and safety management programmes.
- Undertake, co-ordinate and advise on Health and Safety training.
- Be available to meet with and advise Directors / Senior Managers and Health and Safety support teams charged with special responsibility for implementing the Health and Safety management programme on the development and implementation of Health and Safety issues, procedures and controls.
- Undertake Health and Safety audits and inspections as required by this policy and undertake a
  management review on a yearly basis.
- · Appraisals of senior managers to include a discussion of their contribution to Health and Safety.
- Liaise with enforcement agencies in the various areas / geographies where the ISG is operating.
  - The Heads of Health and Safety shall promote understanding of the requirements for the development of the following core areas:
  - 1. Identification of significant risks
  - 2. Information for third parties
  - 3. Implementation and review of the requirements of project Health and Safety plans
  - 4. Task safety analysis
  - 5. Risk assessment criteria monitoring standards
  - 6. Safe working and methodologies without risks to persons
  - 7. Legal compliance
  - 8. Leading by personal example
- Provide a monthly Health and Safety report for the COO and Board of Directors detailing accidents, Significant Events, dangerous occurrences, near misses, enforcing authority visits and training compliance.
- Maintain continued professional development regarding new legislative requirements, good practice, developing technology and measures required to ensure compliance with current Health and Safety standards and industry best practice.
- Assist with investigations into major site accidents, incidents and dangerous occurrences to establish
  immediate and root causes and prevention measures. Ensure that investigations are carried out in
  accordance with company procedures. Co- operate with external investigations of accidents/incidents and
  ensure that any recommendations are implemented.

- Implement Group led initiatives to improve Health and Safety standards within ISG and capture KPI's and performance data against agreed deliverables.
- Effectively monitoring of sickness absence and workplace health can alert the board to underlying problems.

## 7.6 Health and Safety Managers / Advisers

All Health and Safety Managers / Advisors must understand the Health and Safety policies and procedures as set out in ISG's management systems (CMS) and ensure all persons who they advise are aware of its requirements.

- The Health and Safety Managers / Advisors shall:
- Be accountable to the Heads of Health and Safety and shall liaise closely with the Managing Director in control of their respective business units for implementing the Health and Safety Management Program.
- Ensure that suitable and sufficient risk assessments are undertaken by contractors and third parties for any works undertaken on ISG premises or ISG projects, records made as required and significant risks reduced to an appropriate level prior to work starting.
- Support and advise all employees with regards to best practice and legal requirements regarding Health and Safety.
- Assist in consulting with employees on Health and Safety.
- Appreciate the responsibility allocated to all individuals within the company operative and management structure.
- Assist with the identification of potential hazards on new contracts and new activities before commencement and liaise with Contractors and project delivery teams.
- Assist and advise on the formulation of Health and Safety Plans, Method Statements, and Risk Assessment.
- Carry out site inspections / audits with managers and/or supervisors to see that safe methods of working
  and good practice are in operation and that all Regulations and Company Policies / Company Standards
  and the requirements of the management system are being observed.
- Maintain records of all injuries, ill health and near miss incidents relating to Health and Safety matters sustained during company operations.
- Assist with training of all employees and develop a company Safety training program.
- Attend Company Health and Safety meetings when requested.
- Provide a monthly Health and Safety report for their defined area detailing accidents, dangerous
  occurrences, near misses, enforcing authority visits, training and compliance.
- Carry out Health and Safety audits as directed by the respective Heads of Health and Safety.
- Maintain liaison with all enforcing authorities and professional bodies.
- Promote within the company an understanding that accident prevention, damage control, quality installation and compliance are an integral part of business and operational efficiency.
- Attend meetings/seminars with Senior Management, Site Management outside agencies as required where Safety and Health issues are a topic of discussion.
- Maintain continued professional development regarding new legislative requirements, good practice, developing technology and measures required to ensure compliance with current Health and Safety standards and industry best practice.

- Assist with investigations into major accidents (including over 7day injuries), incidents, Significant Events
  and Dangerous Occurrences to establish immediate and root causes and prevention measures and
  ensure the dissemination of root causes and preventative measures. Ensure that investigations are carried
  out in accordance with company procedures. Co-operate with external investigations of accidents/incidents
  and ensure that any recommendations are implemented. Share details of any Significant Events, causes
  and lessons learned with other operating business units and ISG Group Safety function.
- At all times set a personal example promoting high standards together with positive, proactive approach regarding Health and Safety standards and matters.

# 7.7 All Managers will:

- Read and understand ISG's policies for Health & Safety and ensure that it is readily available at all work locations. Plan all work in accordance with their requirements and ensure that they are regularly examined and notify members of the Health and Safety teams of any improvements or additions that should be made.
- Ensure risk assessments are provided in accordance with statutory requirements to establish the working
  method, outline potential hazards at each stage and indicate precautions to be adopted. These should be
  defined within the Construction Phase Plan.
- Discharge their respective responsibility for developing, reviewing, monitoring and communicating the Construction Phase Plan.
- Ensure safe systems of work have been established and communicated to all concerned prior to any works being undertaken.
- Understand ISG's policy and appreciate the responsibilities allocated to each employee; and supply adequate support, resource and monitoring to ensure compliance.
- Set a high standard of personal Health and Safety with zero tolerance for unsafe practices at all times on all company premises. Set a high standard of personal Health and Safety awareness at all times on all ISG premises.
- Ensure that work is planned, organised and carried out to company and statutory standards; with minimum risk to all personnel (including members of public), equipment and materials.
- Ensure contractors are provided with appropriate instructions and comprehensible information regarding any risks to that person's Health and Safety.
- Ensure that all personnel including subcontractors are adequately trained to carry out their duties and that all ISG staff are given a company induction within 90 days of starting work. Ensure that all contractors /volunteers, visitors to projects receive a Safety induction prior to starting work or walking the project.
- Co-ordinate activities between principal contractor, subcontractors, and any other contractor working on any
  company premises to minimise the potential for a Health, and Safety incident.
- Carry out recorded Health and Safety inspections of site conditions and other company premises.
- Ensure monthly Health and Safety documentation is completed and submitted in accordance with agreed timetable.
- Assist with investigations into major site accidents (including over 7-day injuries), incidents Significant
  Events and Dangerous Occurrences to establish immediate and root causes and prevention measures.
  Ensure that investigations are carried out in accordance with company procedures. Co-operate with external
  investigations of accidents/incidents and ensure that any recommendations are implemented. Share details
  of any Significant Events, causes and lessons learned with other operating business units and ISG Group
  Safety function.
- Ensure Health and Safety is treated as a priority and that adequate communication is established to ensure all staff are aware of Health and Safety requirements and developments.

- Take disciplinary action against persistent offenders of Health and Safety requirements and any staff who
  fail to discharge Health and Safety duties, including ISG staff and contractors.
- Where applicable ensure the information required for the Health and safety File is made available to the Principal Designer.
- Assist in the end of contract project review process.
- Effectively monitoring of sickness absence and workplace health.
- Assist in consulting with employees on Health and Safety

# 7.8 All Surveyors and Commercial staff will:

- Read and understand ISG's policies for Health and Safety and appreciate the responsibilities allocated to all
  individuals within the company operative and management structure.
- Personally set a high standard of Health and Safety at all times on all company premises.
- Ensure all Sub-Contractors employed by ISG are made aware of all Health and Safety requirements prior to appointment, in accordance with the (CMS). e.g. Health and Safety mandatory questionnaires and documentation. Specific requirements for high risk activities and general Health and Safety requirements.
- Ensure orders are only placed with sub-contractors who have an approved status on the ISG vendor management system.
- Ensure the information contained in the Health and Safety plans and any relevant Company Standards are made available to all Sub-Contractors prior to start on site.
- Assist management in ensuring that work is organised, resourced and managed so that work is carried out
  to both ISG/ statutory standards and requirements with minimum risk to all workers, equipment, materials,
  members of the public and persons not in ISG employment.
- Ensure that prior to issuing sub-contracts that all Sub-Contractor personnel have the required skills, knowledge and experience to carry out their duties on site.
- Assist management in coordinating Safety activities between the Principal Contractor, Subcontractors and any other contractor working on ISG premises.
- Be in attendance with Managers when recorded Health and Safety inspections are carried out.
- Ensure Health and Safety is treated as a priority and assist in the communication to all site personnel of health and safety requirements and developments.
- Ensure the requirements are made known to the Subcontractor relevant to his passing information to ISG for inclusion in the Health and Safety File.
- Liaise with other management on all matters concerning the appointment of Subcontractors, including their health and safety performance and supervision.
- Support other management in the discharging of their responsibilities.
- Ensure adequate resources and funding is available for projects to be set up and delivered to ISG Health and Safety standards.
- Ensure the correct personal protective equipment is worn when visiting sites.

## 7.9 Estimators / Bid Managers / Planners will:

- Read and understand ISG policies for Health and Safety and appreciate the responsibilities allocated to all individuals within the ISG operative and management structure.
- Ensure adequate provision in tenders to cover safe methods of work, necessary welfare facilities, considerations and the requirements of the Pre-Construction Information provided.
- Report on unsafe Health and Safety practices when visiting sites.
- Ensure the correct personal protective equipment is worn when visiting sites.
- Set a high standard of personal Health and Safety awareness at all times on all company premises.
- Gain advice as required on sound methods of work, welfare facilities and Health and Safety best practice
  from relevant staff and the Health and Safety department to include in estimates and quotations for work.
- Comply with the Company's procedures for competence assessments of prospective sub-contractors and passage of information on standards and Health and Safety requirements.

## 7.10 RETAIL ONLY Engineers/Foremen/Supervisors will:

- Read and understand the company policy for Health & Safety contained within the site Health and Safety plan and ensure employees and sub-contractors follow its requirements where it affects them.
- Appreciate the responsibility allocated to individuals within ISG operative and management structure.
- Set a good example by working safely on the site and wearing the appropriate personal protective
  equipment.
- Ensure site rules are enforced.
- Ensure that only trained and authorised workers use plant and equipment and that persons undergoing training do not operate plant and equipment unless strictly supervised by a competent person.
- Ensuring that all staff are given a company induction within their first 90 days of employment within ISG and are correctly supervised at all times.
- Ensure that plant and equipment under their control or brought to site by the subcontractor has any
  necessary certificates of test, inspection and examination and kept in safe condition to use.
- Ensure that clear instruction and information is given to persons under their control.
- · Carry out recorded Health and Safety inspections of site conditions.
- Ensure that persons under their control wear and use any personal protective equipment correctly, to manufacturer's instructions and to statutory and company requirements.
- Ensure that site employees under their control are given toolbox talks and Safety briefings as required by the ISG Health and Safety policy and that details of control measures from risk assessments are fully explained.
- Ensure that any accident/incident is reported to the site manager as soon as is possible and that all
  accidents are entered in the correct site and ISG documentation.
- Ensure that access/egress routes are kept clear from obstruction, particularly escape routes and ensure that good housekeeping is observed at all times.
- Ensure that any plant/equipment for use by employees under their control is checked to ensure any
  necessary guards or safety devices are checked by competent persons prior to use.
- Liaise and co-operate with the company Health and Safety department during their visits.

- · Attend any meeting on Health and Safety issues as required.
- Read and understand the responsibilities within the Health and Safety plan.
- Ensure they take reasonable care of the Health and Safety of themselves and others who may be affected by their acts or omissions at work.
- Comply with any duty or requirement imposed by ISG, to enable ISG to fulfil its legal duties or requirements.
- Ensure site traffic management policies are in place and adhered to at all times by all persons on site.

# 7.11 Directly Employed Operatives: Operatives will:

- Read and understand the company policies for Health and Safety, set a good example and work safely on site at all times.
- Use the correct tools and equipment for the job in hand as identified in method statements, risk assessments and COSHH assessments.
- Request the correct tools to carry out tasks safely.
- Read any instructions provided for tools or machinery not previously used.
- Inform their supervisor where any training or instructions would reasonable represent a shortcoming in the
  protection of Health and Safety.
- Keep any tools and equipment in good condition.
- Report any defects in plant or equipment to the immediate supervisor.
- Be aware of the position of spill kits and report any leaks or spillages that may lead to contamination.
- Wear the protective equipment provided as appropriate and maintain it in good condition.
- Carry out recorded Health and Safety inspections of site conditions if required.
- Refrain from horseplay.
- Suggest ways of improving Health and Safety and eliminating hazards.
- Maintain a safe working environment.
- · Not interfere, misuse or remove anything provided in the interest of Safety, Health and Welfare.
- Not abuse the welfare facilities provided on company premises.
- Not use plant and equipment unless trained and authorised to do so.
- Attend the site Health and Safety induction before commencing work.
- Read and understand their responsibilities within the Health and Safety plan.
- Report unsafe acts to the Site Management.
- Comply with any duty or requirement imposed by ISG, to enable ISG to fulfil its legal duties or requirements.

# 7.12 Office Staff will

Read and understand the company policies for Health and Safety and carry out their work according to its

requirements.

- Ensure that they are fully aware of the procedures in the event of an emergency, including
  - o positions of the fire exit and the assembly point locations
  - Nominated Fire Wardens
  - o position of the first aid equipment and the identity of the trained first aid personnel
  - o any accident or damage procedures
- Report any defects in office equipment immediately to your line manager.
- Observe good housekeeping at all times and keep corridors, doorways and floor spaces clear and free from
  obstruction.
- Not attempt to lift or move articles as heavy and likely to cause injury.
- Not overreach for items on high shelves, using the correct access equipment provided.
- Not misuse or interfere with equipment provided for the Safety of you and others.
- Not try to use, repair or maintain any equipment for which you have not received training or instruction.
- Complete and return Display Screen Assessments as and when requested.
- Follow office recycling procedures.
- Ensure you comply with the relevant office procedures regarding signing in and out.
- Notify senior management of any suspicious packages or behaviours.
- Comply with any duty or requirement imposed by ISG, to enable ISG to fulfil its legal duties or requirements.
- Immediately report any unsafe working practices or hazards.

## 8. General Arrangements

Detailed arrangements can be found in the local company management system (CMS).

1 First Aid

Suitably trained and certificated number of First Aid personnel will be appointed for each project and office location where the company conducts its business. The appointed person/s will be responsible for First Aid on site including care and maintenance and restocking of the site First Aid Kit. When the first aid at work trained person leaves site emergency cover will be provided.

2 Incident, Accident and emergency procedures

All reportable accidents, dangerous occurrences, incidents, Significant Events and cases of disease are to be reported promptly in accordance with the accident reporting requirements of the management system (CMS) and to the Statutory Authorities as required by the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013 (RIDDOR) and in Country requirements, within local legislative timeframes. A full investigation will be carried out where required to identify immediate and root causes and introduce measures to prevent recurrence. All recommendations are to be considered as a result of these investigations. Following any major incident, lessons learned will be communicated via Significant Event reports and Alerts/ Bulletins which will be issued to all sites and office locations informing all staff of the circumstances relating to the incident. Any emergency procedures required (both in permanent and transient locations) will be developed according to office or project needs.

## 3 Fire management & hot works

All personnel must take note of and comply with any Fire Precaution Notices / Plans displayed in ISG Group of Companies work locations. Suitable and sufficient fire-fighting appliances will be located throughout the working area. All emergency fire exits will be kept clear at all times. The company will operate a documented Hot Work Permit procedure. The storage of flammable liquids and materials must be kept to the minimum, appropriately marked and stored correctly to meet the current legislation and insurance requirements concerning fire.

Adequate consideration must be given at the planning stage on all projects to the establishment of safe means of access and escape, incorporating a strategy of compartmentalisation designed to reduce the spread of fire during construction.

# 4 Health and welfare facilities

The Manager responsible for the project will allocate all Health and Welfare facilities required on projects. All mess rooms allocated for site use will be adequate and suitable for the total number of persons likely to use them at any one time. They will be provided to projects in a clean and tidy condition, toilets and washing facilities will be provided at an adequate and suitable ratio to the number of persons employed on projects. When in use, all project facilities will be maintained in a clean and tidy condition.

# 5 Manual handling

Manual handling operations are to be avoided so far as is reasonably practicable and where such avoidance is not possible a suitable and sufficient assessment must be made. This assessment must reduce the risk of injury from those operations by mechanisation, automation and careful planning of such activities, taking into consideration the task, individual, load and environment. Manual handling assessments are to be carried out in accordance with the ISG Group of Companies Management System (CMS).

## 6 COSHH Control of Substances Hazardous to Health (COSHH)

The company uses a range of materials, some of which have the potential for causing ill health, but if handled properly and with due regard for the risks involved the chance of harm can be minimised. The aim is the protection of health, in which everyone has an interest in ensuring success. While planning works involving substances hazardous to health, Material Safety Data Sheets (MSDS) must be consulted so that an adequate COSHH assessment can be undertaken. This must then be communicated to the person / site operative undertaking the work, so that they can implement adequate controls as identified in the COSHH assessment and in accordance with the ISG Group of Companies Management System (CMS).

# 7 Safe systems of work

The company shall ensure that a Safe System of Work is provided and communicated in a timely manner to all personnel who will require the information, so that they can plan and complete a given task in an adequate, appropriate and correct manner in relation to Health and Safety. Specific Hazard data risk assessments / method statements shall be provided during all hazardous operations. Method statements and risk assessments shall be prepared in line with the ISG Group of Companies Management System (CMS).

# 8 Visitors to site

All visitors will be given a site-specific induction and be required to sign a visitor's register. Visitors must be escorted at all times whilst on the company's premises.

# 9 Young persons

The Management of Health and Safety Work Regulations 1999 require that employers ensure the Health and Safety of young persons (Over 16 and under 18 years of age) by the completion of a suitable and sufficient Risk Assessment (considering their immaturity and lack of experience etc) to identify and control risk to their Health, Safety and wellbeing. The ISG Group of Companies will provide suitable and sufficient Risk Assessment for any young people brought into to the workplace. They also expect any Sub-contractor used by them to ensure the same requirements are met.

# 10 Scaffolding

Scaffold will only be erected or altered by trained and competent persons, giving cognisance to the complexity of the scaffold design (basic or designed scaffold). Pre-use handover certificates shall be issued by the erector and access to the working platforms will be provided by the erector. All loading bays shall be guarded using a proprietary gate system. All scaffolds will be erected in accordance with the requirements of SG:4/TG20 (current edition) and EN12811. The Use of Fall Prevention and Fall Arrest Equipment whilst Erecting, Altering & Dismantling Scaffolding is a mandatory requirement. Scaff-tag or similar systems will be introduced and recorded inspections will take place every 7 days or following inclement weather or any incident which may affect the stability and integrity of the scaffold. The individual user prior to access should visually inspect scaffolds and report any defects to the Project team without delay.

# 11 Working at height

All working at height must be planned and conducted in accordance with the Work at Height Regulations 2005. Any working platforms that are to be used will be selected, assembled and used in accordance with the Working at Height Regulations 2005 and the ISG work at Height Company Standard, which includes the requirement to follow the established hierarchy of risk and hierarchy of control. Adequate consideration must be given to the prevention of falling tools, materials and components, in accordance with the ISG Working at Height Standard.

The use of ladders on site will only be authorised on submittal of a Ladder Justification form and adequate risk assessment which clearly demonstrates that safer alternatives are not suitable for the task, that they will be restricted for short duration work only and that a three-point contact with the ladder frame can be maintained at all times.

Ladders shall be of sound condition and fit for the purpose intended; the foot of the ladder should be supported on a firm level surface, at the correct angle and should not rest either on loose material or on other equipment to gain extra height. The top of the ladder shall be securely fixed to the structure so that it cannot slip. While lashings etc. are being secured the ladder shall be footed, the ladder should extend 5 rungs above the step off point. Ladders (including stepladders) are provided as an access to a work area only and should not be used as a working platform or for transporting materials to the work area

#### 12 Electrical

The fixed electrical systems used in our premises have been inspected, tested and certificated by a competent electrical contractor. Our employees are instructed to make a visual Safety check of portable electrical equipment each time that it is used. They report defects to us for repair or replacement. We have also implemented a formal system for the more thorough inspection and electrical test of portable electrical equipment (PAT) by appointed contractors at company locations. We keep an inventory of equipment and records of these inspections.

Nominated NICEIC or ECA approved contractors will carry out electrical connections, checks and alterations to temporary accommodation. Temporary electricity supplies to site accommodation shall be tested on installation and at three monthly intervals. Generally, electricity supplies above 33,000 volts are routed overhead. Below this voltage they may be overhead or underground. If work is required to be carried out near overhead power lines, the electrical provider shall be consulted before work commences and a safe system of work devised and implemented. 110V electrical tools, temporary lighting and other equipment shall be used at all times, unless local (overseas) voltages require 220-240v equipment be used, protected by an RCD in line with current (regional) legislation. Routine inspection will be carried out in accordance with the ISG Group of Companies Management System (CMS). Electrical work undertaken on ISG projects shall be completed in accordance with ISG management systems and Electrical Safe Systems of Work

## 13 Roof work

As a high-risk activity it is important that any roof-work operations follow the hierarchy of controls. The particular hazards of each job and the best means of overcoming them must be considered so that a safe method of work can be established with a detailed written method statement prepared. Before any roof is used as a means of access or as a place of work during any operation, whether for construction, repair, maintenance, it is essential to identify all risks associated with work at height including fragile materials and decide on the precautions to be taken. When fall prevention measures cannot be introduced, fall arrest equipment shall be provided such as harnesses and lanyards air/bean bags. When nets are provided the manufacturer's, advice shall be sought on the suitability of any particular net for the purpose for which it is to be used. When work from a roof may endanger the public by falling materials, brick-quards/fans, material and tool tethering or other similar

precautions shall be provided. The majority of roof work will require a permit to work. Where harnesses and lanyards are used, only trained and competent persons shall use them.

#### 14 Excavations

Excavations work shall be carried out under the control of the Permit-to-Dig procedure. There is no minimum depth requirement for the shoring of excavations. Adequate supplies of support materials matching the support design/s shall be available before the excavation commences and will be of sound construction, free of defects, of adequate strength and properly maintained. Supports shall be fixed securely to prevent displacement. Care shall be taken to see that excavation work does not jeopardise the stability of any adjacent structure. Safe means of access and egress to and from an excavation shall be provided. Ladders shall be securely fixed and properly maintained and shall permit quick and easy escape in case of flooding or falls of materials.

Where a person may be exposed to a risk of fall, suitable and sufficient barriers shall be erected; shallow excavations shall have suitable barriers erected where persons may fall into them. Barriers shall be erected to keep materials, plant and equipment away from the edges of an excavation. Barriers may be removed to permit access of men, plant and equipment etc; they shall be replaced as soon as possible. Spoil heaps can form part of the barrier. During darkness the edges of an excavation shall also be marked with lights, where there is a danger to the general public. All excavations shall be inspected before work starts, on a daily basis and thoroughly examined weekly, or after substantial damage or any other factor that may affects its integrity i.e. severe weather etc. A record of these examinations shall be recorded on the appropriate documentation.

Before any excavation work is undertaken a survey of the area shall be conducted. The owners of the services shall be contacted to obtain plans to show the approximate line and depth of known cables. If possible, cable routes shall be avoided; a cable-locating device (CAT and Genny, GPR etc) shall be used to trace the position of the cable as accurately as possible in conjunction with any available cable plans. The line of any cable shall be noted and marked using paint, wooden pegs, waterproof chalk etc. Power tools shall not be used within 0.6m of the indicated line of the cable or service.

# 15 Lifting operations

Lifting equipment is defined as work equipment used for lifting, lowering and suspending of loads (including persons) and any attachments for anchoring, fixing or supporting the load. All lifts shall be properly planned, appropriately supervised by a competent person and carried out in a safe manner. All equipment and accessories must be tested in accordance with current legislation and copies of certification held on site. Clarification of responsibilities shall be sought with crane hirers and the following documentation requested prior to work commencement

- 12 monthly test and examination
- 6 monthly test certificates for slings, chains, man baskets, associated lifting gear
- Lift plan signed off as suitably developed by a CPCS Appointed Person
- operators competency certification
- method statement/risk assessments for work to be carried out
- name of nominated competent person supervising the lifting operation

All cranes and other lifting appliances shall be clearly marked with their maximum safe working load (SWL). If the driver cannot see his load during the whole lifting operation he shall have one or more trained signaller (banksmen) or some other signalling system to enable him to handle the load safely.

Where tower cranes are used a thorough test and examination must be carried out after erection and before being put into use for the first time. No lifting operation/s will be permitted without an adequate lifting plan in place.

# 16 Work equipment

Work equipment can be defined as any machinery, equipment, appliance, apparatus tool or installation for use at work. All work equipment shall be inspected and monitored as detailed in the ISG Group of Companies Management System (CMS).

# 17 Mobile plant

When plant is constantly moving on or around a site or being relocated, the factors that create hazards and cause accidents may be more difficult to anticipate and eliminate. All vehicle movements will be controlled by a written traffic management procedure in accordance with the ISG Group of Companies Management System (CMS) ensuring vehicle/pedestrian separation at all times.

# 18 Confined spaces

Wherever work is to be carried out in any confined space, adequate ventilation will be provided and maintained. Suitable and adequate means of access to and egress from the confined space will be provided and maintained. It may be necessary that the air in certain confined spaces will require monitoring before work commences and at regular intervals during work procedures. When planning work in any confined space the possibility of a lack of oxygen must be considered. Before any confined space working is allowed the environment to be worked must be tested by a competent person and a Permit-to-Enter issued. An emergency rescue place must be in place before any works commence. Only trained and competent persons are allowed to undertake work in confined spaces or to operate as the 'Top Man'.

#### 19 Asbestos

A licensed sub-contractor must be used to remove asbestos material with full documentation provided prior to work commencement. The HSE shall be notified 14 days before removal begins for notifiable works. Method statements and risk assessments will be communicated to all persons carrying out or affected by asbestos removal works. Where asbestos is known/suspected to be present all staff will be briefed on the procedure for un expected discovered material that might contain or be asbestos. Asbestos decontamination units and locked skips must be situated at locations that are as close to the place of work as is reasonably possible.

# 20 Control of waste

Waste produced on site will be deposited in skips to be removed and replaced as required in accordance with project Site Waste Management Plans. The Waste Company will be fully registered for waste disposal and must provide a duty of care waste transfer notice to be filed in the site office. A specialist-licensed sub-contractor who will supply all necessary Safety documentation prior to starting on site will remove contaminated waste. Duty of care-controlled waste certificates will be provided and a copy of Certificate of Registration as required under current legislation will be available following removal. All site locations will prepare and operate a Site Waste Management Plan. (SWMP)

## 21 Personal protective equipment (PPE.)

All personnel will wear task appropriate PPE. as highlighted in their risk assessment and/or method statement. Where sites are designated a PPE area; hard hat with 4-point chin strap, Safety footwear, high visibility clothing, light eye protection and gloves will be worn at all times and appropriate signage will be displayed. In some (non-UK) countries, business units must wear a minimum or 3 points PPE, namely Hard hat, Hi-Vis and Safety boots and be in the process of transitioning to 5-point PPE.

# 22 Communication / consultation on matters of Health and Safety

Regular senior management Health and Safety reviews are held and attended by senior staff, Health & Safety Manager, Health and Safety Department, Office Manager and Directors.

All sites will hold health and Safety Forum meetings on a regular basis attended by members of the project team and sub- contractors working on the project. This will ensure communication between all companies on site hazards, work methods, programming for Safety and all aspects of site Health, Safety and Welfare. All meetings will be recorded and actions identified. Minutes will be taken of all meetings with protective and preventative measures taken and the minutes displayed on site notice boards.

Site induction / Toolbox talks involving all those involved with the work will be held prior to commencement of works as detailed in the ISG Group of Companies Management System (CMS). ISG Group of Companies will

operate an open-door policy to allow any individual to raise any Safety, Health and Welfare concerns to site management - this will be communicated at induction and posters displayed in site welfare facilities. All issues raised will be treated with confidentiality and where necessary appropriate action taken.

### 23 Subcontractors

ISG Group of Companies fully endorses their commitment to a fully qualified workforce and will check all sub-contractors working on their sites to confirm they have the appropriate skills, knowledge and experience to undertake the tasks for which they have been employed. All Sub-contractors must produce the following information prior to site start-up:

- · company Health and Safety Policy
- ISG completed sub-contractors declaration
- appropriate insurance/s
- method statements/risk assessments
- emergency procedures including rescue planning where required
- management and operative training records (including CSCS or equivalent details)
- plant and equipment (records of preventative inspections and maintenance)
- waste carriers licence registration document

This information will be checked and approved prior to work commencement. Subcontractor Health and Safety performance will be closely monitored at all times and post contract reviews and re-checks will be carried out at contract completion. Any sub-contractors failing to reach the desired levels of Health, Safety & compliance will be prevented from working on further contracts until the necessary steps have been taken to ensure improvements in performance.

# 24 Temporary staff

Where temporary workers (i.e. Agency Personnel /freelancers) are employed, the company will ensure through enquiry and consultation that the individual is trained, competent and fit to carry out their duties. The Project Team shall check that all agency personnel have received a site-specific induction and all relevant information (i.e. Risk Assessments and Method Statements) for them to carry out the role safely.

# 25 Drugs, alcohol and smoking policy

ISG Group of Companies will not tolerate any drug or alcohol abuse from any of their workforce, temporary employees or sub- contractor employees. Anyone suspected of being under the influence of any non-prescription drug, alcohol, or prescription drug (except under medical supervision) which may affect their ability to perform their duties in a safe manner, will be subject to the procedures set out in the ISG Drug and Alcohol policy

ISG prohibit smoking and the use of e-cigarettes on all premises under ISG control unless a dedicated area has been put aside for this purpose.

# 26 Training

Formal Health and Safety training requirements will be identified by managers in consultation with the health and Safety Departments. Directors are responsible for ensuring that their staff are trained in line with the ISG Group of Companies training matrix. Managers will review their Health and Safety training requirements on a monthly basis during Health and Safety management Review Meetings.

# 27 Health & Safety monitoring and control

At every work location the project/nominated manager will ensure that regular inspections are carried out to ensure that work operations are being carried out in accordance with the location specific Construction Phase Plan, Method Statements/Risk Assessments, Management plan and company Health & Safety, Quality and policies. These inspections will take into consideration the work operations taking place and the location conditions prevailing at the time. Site inspections and audits will be carried out in accordance with the ISG Group of Companies Management System (CMS). The periods of formal inspections shall be a minimum of every seven days by the project teams, monthly by contracts/senior management, directors and annually by the managing director, unless prior agreement with the Head of Health and Safety has been given, but the period

between inspections must not exceed 2 weeks. Health and Safety Departments will issue formally report at each inspection. In addition to inspections, formal written audits will take place by the Health and Safety teams.

## 28 Housekeeping

ISG Group of Companies operates a "Clean Floor Policy" and a 'Clear as you go' policy' and good housekeeping is to be observed at all times at all ISG work locations where safe access and egress to work areas must be maintained. Regular cleaning of spent materials, debris and unused material will be undertaken, where applicable sub-contractors must be held responsible for keeping work areas and welfare facilities in a clean and tidy condition. Lay-down areas must be incorporated into the Health and Safety plans wherever practicable. This is to allow for the safe storage and subsequent distribution of materials. Sites are to be kept clean and tidy, free from dust (so far as is practicable) and walkways and safe routes kept free from obstructions.

#### 29 Display screen equipment

An assessment of every workstation used is carried out, in order to identify the risks and precipitate action to reduce them to the lowest extent reasonably practicable. Workstation assessments will be carried out as detailed in the ISG Group of Companies Management System and in accordance with the Display Screen Equipment regulations and ISG processes.

#### 30 Road risk

Whilst driving on company business we must exercise a duty of care to other road users. All drivers must operate within the ISG Group of Companies and ISG Group driving policy documents and recognise the need for journey planning, regular breaks during long journeys and the care and maintenance of the vehicle being used. The use of mobile phones when driving is discouraged and if urgent, staff are required to use a handsfree kit. The company does not expect or encourage anyone to make or receive a call when driving.

ISG only authorise appropriately licenced drivers and ensure that all vehicles are adequately insured, inspected and maintained.

# 31 Temporary works

Temporary works may consist of trench support, falsework or structural support of existing buildings or of a building under construction. The size of temporary works may vary from major structural support to needles in existing buildings. Each item of temporary works shall be assessed and classified by the Project team in accordance with the ISG Group of Companies Management System (CMS). Works identified shall be from prestart, through to the installation and eventual removal.

# 32 Demolition

The demolition or dismantling of a building or part of a building must only be undertaken by competent, experienced and trained persons working for a NFDC registered (or equivalent) company. All demolition works need to be adequately planned by a competent person, in many cases a structural engineer, to ensure that the demolition process is controlled, giving adequate consideration for the building's stability and structural integrity. Adequate consideration must be given to the building's location, any adjacent buildings and above all and members of the public.

## 33 Company Standards

ISG Company Standard are intended as guidance and at all times Legal Compliance will be viewed as the minimum acceptable standard to be followed, however ISG require ISG staff and Contractors to adopt the safest method of working possible at all times and comply with ISG requirements if higher than legislative requirements. ISG standards set out ISG's goals and expectations and does not replace any specific legislation or approved codes of practice.

## 34 Procedures for serious and imminent danger and for dangerous areas /situations identified

Whenever imminent danger or foreseeable danger has been identified, all ISG staff shall ensure that, so far as is practicable, persons are removed from danger without delay, the severity of harm arising from dangerous

situations / dangerous areas is reduced to as low as is reasonably practicable. Harm to individuals and damage to property shall be prevented whenever possible and when not possible mitigated to a level that is as low as is reasonably practicable. ISG staff shall respond to a major Health and Safety, fire or incident in an appropriate and structured way so that the Company can comply with its obligations and to ensure that the welfare of employees and others involved is considered. The arrangements for responding to Major incidents are set out in the ISG Major Incident Response Protocol

## 35 Legionella

We have a duty to protect the health of our workforce and others affected by our activities from the risk of infection by Legionella Pneumophila from our hot water and cooling systems and from hot water and cooling systems on ISG construction projects. We have to assess the risk of infection and attempt to eliminate that risk or implement suitable control measures. Within ISG controlled premises, the control measures are reviewed at least every 12 months and the risk assessment every 2 years. On ISG projects, an assessment of risk is to be undertaken prior to work commencing and appropriate controls implemented.

#### 36 Occupational Health

ISG recognise that 100 times as many workers are made ill by work than are injured in accidents. Construction workers have one of the highest rates of work related illness of all occupational groups in Europe and as such ISG require the 'Principles of Prevention' (Schedule 1 MHSW Regs 1999) to be applied to all occupational health hazards whenever ISG staff or contractors working on behalf of ISG are working with such hazards.

## 37 Lone Working and Out of Hours Working

ISG prohibit lone working whenever high-risk activities are being undertaken (e.g. steel erection, roof-work, cladding, asbestos removal, work at height, working in excavations over 600mm deep; this list is not exhaustive) and ISG management supervision must be on site at all times when high risk works are being completed. Whenever Out of Hours work is required i.e. work into the evening or over weekends, an ISG manager must be present at all times.

Occasionally ISG employees may, as part of their duties, have to work alone for all or part of the working period. We identify the risks to which these employees are exposed with the aim of eliminating these risks wherever reasonably practicable and reducing lone working activities and out of hours working activities to a minimum. Where lone working is necessary and does take place, we identify and implement systems to ensure that safe working and communication exists between the lone worker and their management. Affected workers have been notified of our arrangements for the management of lone working activities and that we require them to notify management of any concerns they may have.

# 38 Gas Safety

Gas appliances and supply pipes are subject to an annual Safety check by a GasSafe™ registered engineer. The main isolating controls are clearly marked and accessible so that the supply can be quickly isolated in an emergency. On all ISG projects, wherever connections to gas systems are to be made, these are to be undertaken by GasSafe™ registered engineers.

# 39 Risk Assessment

We undertake risk assessments of all identified hazards related to work undertaken by our workforce. We eliminate these risks wherever possible. Where we cannot achieve this, we implement suitable and sufficient control measures, based on these assessments, to reduce and manage, so far as is reasonably practicable, the risks to our workers and others. Our risk assessments are reviewed periodically, and new work activities are risk assessed, as above. These risk assessments are reviewed annually and updated as required. They are also reviewed whenever circumstances have changed and following the investigation of any accidents or incidents that may occur.

Whenever work in undertaken by contractors appointed by ISG, contractors are required to assess the risks associated with their work and put in place controls measures to mitigate the risks to a level that is as low as is reasonably practicable, before work commences. Risk assessments written for construction site activities must have achieved 'A' status before work commences and must be reviewed and where needed re-written whenever

circumstances have changed or following the investigation of an accidents or incidents that may have occurred that is related to current works, or by no later than 3 months after first issue.

## 40 CDM Regulations

The Construction (Design and Management) Regulations (CDM Regulations) are intended to ensure that Health and Safety issues are properly considered during all phases of a construction project. All ISG staff and contractors working on behalf of ISG must give adequate consideration to the requirements of these regulations and the duties outlined within the CDM 2015 regulations.

## 41 Mental Health & Mental Wellbeing

We recognise that we have a duty to act to reduce and where reasonably practicable to eliminate ill health which is caused by work related stress. Where we believe an employee is showing signs of work related stress we have in place systems to discreetly monitor and assess individuals. Where appropriate we seek to provide the necessary occupational health assistance and counselling programmes where required. All employees have been enrolled into the Employee Assistance Programme which is accessible to staff 24 hours a day through the ISG Workspace intranet page. Further details can be sought from the HR department.

# 42 High Risk Activities

Some construction projects require works to be undertaken that are unusual, out of the ordinary or rarely encountered i.e. working with explosives, working from boats, pontoons etc. In such cases no work shall commence until a suitable and sufficient assessment of risk has been completed a Safe System of Work has been developed and adequate control measures implemented, in accordance with the Hierarchy of Controls. In cases such as this, a member of the ISG Health and Safety team must be notified prior to any work taking place.

# 43 Whistle Blowing

It is the duty of all employees of ISG (as defined in para 3.7) to immediately report any knowledge or suspicion of bribery or corruption and to follow the procedures outlined in ISG's Whistleblowing policy, a copy of which is available within the Governance and compliance section of Workspace.

#### This policy was approved by the Board of Directors of ISG Ltd on

For and on behalf of ISG Ltd

Signed:

Matt Blowers

**Chief Executive Officer** 

Date: January 2024