



## HEALTH & SAFETY POLICY - 2026

### GENERAL HEALTH & SAFETY POLICY STATEMENT

### RESPONSIBILITIES

Group CEO

Directors

Compliance Manager

Managers

Supervisors

Operatives / Employees

Subcontractors

Construction (Design & Management) Regulations 2015

### GENERAL ARRANGEMENTS

Competency & Training

Communication & Consultation

Incident/Accident Reporting

RIDDOR

First Aid

Fire & Emergency

Monitoring & Audit

Work Equipment

Working at Height

Personal Protective Equipment

Manual Handling

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Asbestos

Noise

Vibration

COSHH

Display Screen Equipment

Young Persons

Lone Working

Violence & Harassment

Health Surveillance

## APPENDIXES

- a) Manual Handling
- b) Work Equipment - Maintenance
- c) Risk Assessment
- d) Safe System of Work
- e) Drug & Alcohol Policy
- f) Accident Investigation Flow Chart
- g) Driving at Work Policy
- h) CDM Procedure
- i) Asbestos Policy
- j) First Aid
- k) Vibration Exposure
- l) Working at Height
- m) Radio Frequency Policy
- n) Subcontractor Policy

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## HEALTH & SAFETY POLICY REVIEWS

A formal review of the Health & Safety Policy will be undertaken annually each year.

Review Date	Comments
October 2012 to March 2019 are available upon request.	Issues, reviews, updates
January 2020	Full Policy Review & Update
January 2021	Full Policy Review & Update
January 2022	Full Policy Review & Update
January 2023	Full Policy Review & Update
January 2024	Full Policy Review & Update
July 2024	Group Restructure Update
December 2024	Amendments to Risk Assessment Arrangements & Appendix H CDM Procedure
May 2025	Update to Org Chart & Responsibilities section
May 2026	Version 10 - Added Building Safety Act 2022 arrangement; expanded Fire & Emergency; added Hot Works arrangement; replaced Appendix C risk assessment methodology, H&S Organogram Updated

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## SECTION 1

### GENERAL H&S POLICY STATEMENT

It is the policy of Eurosafes to comply with the terms of the Health & Safety at Work Act 1974, the legislation made under it and to provide & maintain a healthy & safe working environment. Eurosafes health & safety objective is to minimise the number of occupational accidents & illnesses & ultimately to strive for an incident free workplace.

In order to achieve the above aims, Eurosafes will act to:

1. Identify, assess and manage the health and safety risks arising from our work activities
2. Provide information, instruction and supervision for our employees
3. Ensure all our employees are competent to perform their tasks and that they have received adequate training
4. Consult with our employees and actively seek their cooperation on matters that may affect their health and safety
5. Provide and maintain safe equipment and plant
6. Ensure safe working at height practices are conducted safely and that we comply with the Working at Height Regulations 2005
7. Ensure safe handling and use of substances in accordance with the Control of Substances Hazardous to Health regulations (COSHH)
8. Prevent accidents, incidents and cases of ill health, so far as is reasonably practicable. Investigate any incidents thoroughly but proportionately so that we may understand the causes of incidents in order to prevent a reoccurrence
9. Encourage best practice an innovation. Promote and maintain a culture of excellence throughout Eurosafes

The Eurosafes Health & Safety Policy will be continually monitored & revised as necessary & a formal review of the policy will be undertaken every 12 months.

This policy is applicable to Eurosafes Solutions Ltd, Eurosafes Contracting Ltd, Eurosafes Compliance Ltd and Eurosafes Training & PPE Ltd.

Signed

Gavin Ellis,

Group CEO

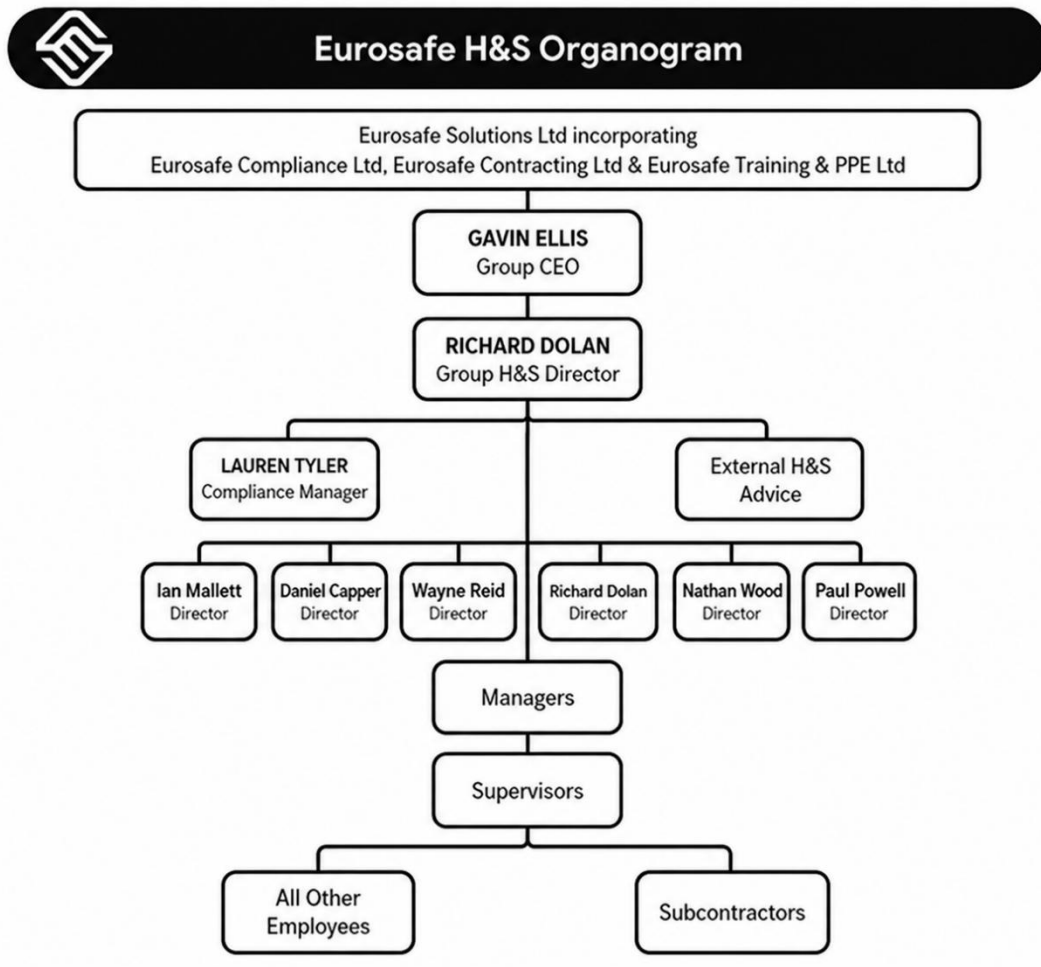
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## SECTION 2

### RESPONSIBILITIES



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## CHIEF EXECUTIVE OFFICER

- Initiate, administer, and interpret the effective implementation of Euro safe's Health & Safety Policy
- Understand the application of the Health & Safety at Work Act 1974 and other relevant legislation to Eurosafe operations along with a general knowledge of relevant Regulations and Codes of Practice.
- Arrange for the necessary funds, facilities and resources sufficient to meet the requirements of this Policy.
- Be aware of changes in legislation which affect Eurosafe.
- Ensure the Health & Safety Policy and its associated procedures are reviewed as necessary.
- Identify any need for particular expertise from outside Eurosafe and ensure that it is obtained.
- Promote the safe conduct of work generally.

## HEALTH & SAFETY DIRECTOR

- Initiate, administer, and interpret the effective implementation of Eurosafe's Health & Safety Policy
- Have an understanding of the application of the Health & Safety at Work Act 1974 and other relevant legislation to Eurosafe's operations along with a general knowledge of relevant Regulations and Codes of Practice.
- Be aware of changes in legislation which affect Eurosafe.
- Ensure the Health & Safety Policy and its associated procedures are reviewed as necessary.
- Ensure that the companies projects are properly planned managed and monitored
- Manage the Managers to ensure that the health and safety considerations are properly applied and executed
- Identify any need for particular expertise from outside Eurosafe and ensure that it is obtained.
- Promote the safe conduct of work generally.

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## COMPLIANCE MANAGER

- Have an understanding of the application of the Health & Safety at Work Act 1974 and other relevant legislation to Eurosafes operations along with a general knowledge of relevant Regulations and Codes of Practice.
- Ensure compliance to the above relevant legislations across all departments and be aware of changes in legislation which affect Eurosafes.
- Familiarise themselves with the contents of Eurosafes Health & Safety Policy & monitor the business to ensure this Policy is being observed.
- Ensure the Health & Safety Policy and its associated procedures are subject to annual review and updated as necessary.
- Ensure 3 monthly, 6 monthly & annual, workplace inspections take place at office locations
- Ensure HSQE site-based inspections are taking place as a minimum of twice monthly.
- Ensure annual fire risk assessment takes place on all Eurosafes premises.
- Collate & present health and safety KPI's at annual directors meeting.
- Carry out all accident/incident investigations including reporting to RIDDOR where appropriate.
- Manage all Health & Safety certification for Eurosafes
- Undertake Fire Safety testing (This duty can be delegated to a competent person)
  - weekly testing of fire alarm
  - Monthly test of emergency lighting
  - Bi-annual emergency evacuation drills at Eurosafes head office.
- Assist with identifying & monitor HSQE training requirements for all employees.
- Overseeing implementation and conducting internal inspections and communication with others
- Ensuring correct persons are visiting sites to ensure that agreed procedures are being implemented
- Carrying out reviews of processes and adapting plans based on feedback
- Maintaining records of compliance practices
- Filing documentation with relevant bodies
- Producing training materials and sharing best practice throughout a business

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- Ensuring that the IMS conforms to the requirements of the standards listed within the system.
- Ensuring that the processes of the IMS are delivering their intended outputs.
- Responsible for overseeing document control and record keeping.

## DIRECTORS

- Initiate, administer, and interpret the effective implementation of Eurosafe's Health & Safety Policy across the groups companies.
- Have an understanding of the application of the Health & Safety at Work Act 1974 and other relevant legislation to Eurosafe's operations along with a general knowledge of relevant Regulations and Codes of Practice.
- Be aware of changes in legislation which affect Eurosafe.
- Ensure the Health & Safety Policy and its associated procedures are reviewed as necessary.
- Ensure that the companies projects are properly planned managed and monitored
- Manage Eurosafe Managers to ensure that the health and safety considerations are properly applied and executed
- Identify any need for particular expertise from outside Eurosafe and ensure that it is obtained.
- Promote the safe conduct of work generally.

## MANAGERS

- Know the general requirements of Health & Safety at Work Act 1974, and legislation applicable to their work.
- Familiarise themselves with the contents of Eurosafe Health & Safety Policy & monitor the running of the site or work area to ensure this Policy is being observed.
- Demonstrating to employees the appropriate level of leadership and commitment required for achieving high standards of health and safety within Eurosafe.
- Ensuring that suitable H&S documentation i.e. Safe Systems of Work & risk assessments have been developed, implemented and maintained up to date clearly showing document history.
- Issue at appropriate intervals controlled documents to relevant parties throughout the project to ensure understanding of project safety, health, environmental and quality requirements.
- Set a personal example, including the wearing or use of protective clothing or equipment, as appropriate.

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- Ensuring that all work activities are adequately planned, resourced and organised to maintain compliance with Eurosafe health and safety policy, statutory and project requirements including:
  - Selecting and issuing suitable and sufficient work equipment
  - Identifying existing site hazards and specifying safe working practices and procedures based on risk assessment requirements
  - Specifying appropriate welfare arrangements
  - Specifying suitable emergency arrangements and provision of emergency equipment
  - Allocating competent personnel who have received the necessary information, instruction, training and supervision to undertake their work activities
  - Maintaining co-operation and communication with relevant parties and ensuring they have been briefed on the project health and safety requirements
  - Suitably monitoring work activities throughout the project

## SUPERVISORS (AND OTHERS IN CHARGE OF WORK AREAS)

- Know the general requirements of Health & Safety at Work Act 1974, and legislation applicable to their work.
- Familiarise themselves with the contents of Eurosafe Health & Safety Policy & monitor the day to day running of the site or work area to ensure this Policy is being observed.
- 'Brief' staff on the Health & Safety documentation i.e Risk Assessments & Safe Systems of Work relevant to the works to be undertaken ensuring that the content is understood & obtain a signature.
- Ensure, so far as it is practicable for them to do so, that all plant and equipment used is safe and fit for purpose & has been tested in accordance with any relevant Regulations.
- Ensure that all machinery and plant, including power and hand tools, are checked, and in good and safe condition, and that any defects are reported to the plant hire company or owner, and/or the relevant manager.
- Where appropriate, ensure that copies of current test/inspection certificates are available.
- Ensure that all periodic tests, inspection and maintenance are carried out.
- Ensure that all repair and maintenance work is carried out in a proper manner and that emergency repairs are dealt with properly as soon as possible.
- Where relevant ensure that appropriate fire-fighting appliances are maintained on site as necessary.
- Ensure that adequate first-aid facilities are established, and that they are available during working hours.
- Accompany Enforcing Authority Officers (e.g. HSE Inspectors, Environmental health Officers) on their site visits.
- Review work hazards and methods with new or transferred employees.

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- Where relevant ensure that statutory notices are displayed and that statutory inspections and registers are being maintained up to date.
- Discourage horseplay and reprimand any employee who consistently fails to consider their own and others wellbeing & report immediately to the Manager responsible for the project.
- Set a personal example, including the wearing of Eurosafe corporate wear, protective clothing & use of equipment, as appropriate.
- Ensure Site Inductions are undertaken for all personnel on site.
- Keep safe custody of the Site Health & Safety Plan and ensure that its contents, particularly Risk Assessments, are known and understood.

## OPERATIVES & ALL OTHER EMPLOYEES

- Use the correct tools and equipment for the job, including safety equipment and protective clothing.
- Keep tools in good condition.
- Report to the person in charge of the work any defects in plant or equipment or any obvious health & safety risks.
- Comply with the requirements of this Health & Safety Policy, and relevant risk assessments and Safe Systems of Work.
- Develop a personal concern for Health & Safety - for themselves and for others, particularly newcomers and young persons.
- Avoid improvising procedures or techniques which entail unnecessary risks.
- Warn new personnel of known hazards.
- Refrain from horseplay and the abuse of welfare facilities.
- Report all incidents & accidents which have led or may lead to injury.
- Suggest ways of eliminating hazards.
- Co-operate in the investigation of any incidents, accidents or dangerous occurrences.
- Set a personal example, including the wearing of Eurosafe corporate wear, protective clothing & use of equipment, as appropriate.
- Follow the local fire and emergency procedures as applicable.
- Set a personal example of good practice in all Health & Safety matters.

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## SUB-CONTRACTORS

Eurosafes recognises that there is a legal requirement to ensure that all Contractors and Sub-Contractors directly employed/appointed have the necessary health and safety competence and resources to carry out their allocated work in a safe manner. An Approved List of Contractor/Sub-Contractors has been established based on satisfactorily completing and achieving the pre-qualification criteria specified by Eurosafes.

Any Contractors/Sub-Contractors wishing to be placed on the Approved List will be requested to complete an appropriate Health and Safety Questionnaire which will be appraised by Eurosafes.

Contractors/sub-contractors are prohibited from further sub-contracting work without the written permission from a Director of Eurosafes. Only where the required health and safety criteria have been achieved will appointment be authorised. Upon completing this process, sub-contractors will be issued with relevant health and safety information to allow them to resource and plan their work.

### ALL SUB-CONTRACTORS ARE SUBJECT TO THE FOLLOWING CONDITIONS:

- All sub-contractors will be expected to comply with the Eurosafes Health and Safety Policy and submit their own Health and Safety Policy and procedures to Eurosafes for verification.
- All work must be carried out in accordance with the relevant statutory provisions and take into account the safety of others including the general public. Sub-contractors employees must comply with any safety instruction given to them by the Site Foreman.
- All plant, equipment and tools brought onto site by sub-contractors must be safe and in good working condition, fitted with any necessary guards and safety devices, and with any necessary certificates available for checking. All operatives must be adequately trained in the use of such plant and equipment and, where appropriate, provide proof of their competence.
- Any injury sustained or damage caused by sub-contractors employees must be reported immediately to the Site Foreman/Supervisor and/or the Manager.
- Sub-contractors will provide the Site Foreman with the name of the Responsible Person they have appointed to manage and control their works.
- Suitable welfare facilities and first-aid arrangements in accordance with the Regulations must be provided by subcontractors for their employees, unless arrangements have been made for sub-contractors employees to have the use of shared facilities, in which notification will be issued detailing the shared facilities provided. Subcontractors will be required to provide, when appropriate, a suitably trained first-aider.
- Any material or substance brought on site which has Health, Fire or Explosion risks must have a suitable COSHH assessment and be used and stored in accordance with this assessment.
- Sub-contractors must ensure that their workplace is kept tidy and all debris, waste materials, etc is cleared as work progresses.
- Sub-contractors will be required to provide and wear appropriate items of personal protective equipment required for the process and environment in which they are engaged.

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## CONSTRUCTION (DESIGN AND MANAGEMENT) REGULATIONS 2015 RESPONSIBILITIES

Eurosafes will fully comply with its duties under the Construction (Design and Management) Regulations 2015 (known as CDM), when carrying out works which fall under the regulations.

On projects where we are appointed to act as Contractor or Principal Contractor we will undertake the duties for this role as set out in the CDM Regulations including the development of a Construction Phase Plan, this will be a simple plan for small projects & on projects which are notifiable a more detailed plan will be produced. On projects where we act as a sub-contractor, we will assist the Principal Contractor in planning the works in a safe and controlled manner, providing them with all the necessary documentation associated with our works.

### DESIGN WORK

- Employees preparing designs on Eurosafes behalf will bring to the attention of clients their duties under the Construction (Design & Management) Regulations 2015 & our employees undertaking designs are required to follow the designer's duties as defined within the HSE Guidance on the Regulations (L153) this will also include liaison with the appointed Principal Designer.
- The guiding principles for designs prepared by Eurosafes are to design to avoid Health & Safety risks, so far as is reasonably practicable. Where avoidance is not possible the risks should be reduced at source as far as practical and all information relevant to Health & Safety should be included with the design.
- It will be Eurosafes practice to co-operate fully with the Principal Designer, where appointed, and with other designers involved in projects to make the maximum contribution to design safety.

### WELFARE AND FIRST-AID

The Construction (Design and Management) Regulations 2015 specify minimum requirements for welfare facilities on construction sites. The Workplace (Health, Safety and Welfare) Regulations 1992 specify minimum standards for offices.

The Health and Safety (First Aid) Regulations 1981, together with Approved Code of Practice and Guidance Note, specify the first-aid equipment, facilities and personnel required, depending on the type of work and numbers of persons affected at each site or workplace.

Whether acting as Principal Contractor or Contractor Eurosafes shall in all cases ensure work is planned to take into account the requirements of the above regulations. Confirmation will be sought to ensure such arrangements will be in place or provided so far as is reasonably practicable for:

- Suitable & sufficient sanitary conveniences
- Suitable & sufficient washing facilities
- An adequate supply of drinking water
- Suitable & sufficient accommodation for the storage of clothing
- Suitable & sufficient rest facilities

Sub-Contractors will be formally notified regarding joint/shared facilities provided on site.

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Within the Main Office a First Aid box shall be provided in the kitchen/staff welfare areas & Warehouse. The contents will be monitored and maintained by Eurosafes Appointed Person for first aid. Vehicle first aid kits are provided in all company vehicles, employees are responsible for maintaining these individually. At least one First Aid at Work trained first aider shall be employed by the company, additional first aiders will be provided in accordance with HSE guidance.

## BUILDING SAFETY ACT 2022

The Building Safety Act 2022 (BSA) introduces a more stringent regulatory regime for the design, construction, and management of buildings, in particular Higher-Risk Buildings (HRBs). Eurosafes recognises its obligations as a duty holder and is committed to meeting all applicable requirements of the BSA and its associated regulations.

### DUTY HOLDER OBLIGATIONS

When engaged on a project as a contractor, Eurosafes acknowledges its role as a duty holder under the BSA and CDM 2015. Eurosafes will:

- Ensure all work is designed and carried out to comply with applicable Building Regulations.
- Cooperate and coordinate with the Client, Principal Designer, and Principal Contractor throughout the project.
- Notify the Principal Contractor promptly of any concerns that may affect building safety compliance.
- Only accept Principal Designer or Principal Contractor appointments where this has been confirmed in writing and where Eurosafes has verified it has the competence and resources to fulfil those duties.

### COMPETENCE

Eurosafes will ensure all staff working on projects within scope of the BSA hold appropriate skills, knowledge, experience and behaviours. Competence assessments will be conducted against the requirements of the role and the level of building safety risk involved. Relevant staff will receive Building Safety Act awareness training appropriate to their responsibilities. A Competency Matrix will be maintained and reviewed annually, recording individual competence against role requirements, and training records will be retained in the Training Matrix.

### INFORMATION AND THE GOLDEN THREAD

Information management is central to the BSA, particularly for Higher-Risk Buildings. Eurosafes will:

- Provide accurate, timely, and relevant information to the Principal Contractor and designers to support compliance with Building Regulations.
- Contribute to the Golden Thread of information where required, using Eurosafes digital CRM and project management systems to record and share relevant project data.
- Ensure change control processes are followed. No design or construction change will be implemented without formal communication to and agreement from the Principal Contractor and relevant designers.
- Provide accurate records of work completed, inspections, and certifications to support project handover and ongoing building safety management.

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## HIGHER-RISK BUILDINGS (HRBS)

Where Eurosafes work involves an HRB (defined under the BSA as a building over 18 metres or seven storeys with at least two residential units), the project will be identified as involving an HRB at the pre-construction planning stage. Eurosafes will support the Principal Contractor in maintaining a Change Control Log for any design or construction changes that could affect the HRBs safety case, and where applicable will cooperate with the Accountable Person or their representatives by providing relevant information relating to Eurosafes scope of work to support safe building management.

## MANDATORY OCCURRENCE REPORTING (MOR)

Eurosafes has a duty under the BSA to report certain occurrences to the Building Safety Regulator (BSR). Full details of Eurosafes MOR obligations and reporting procedure are set out in ESL-POL-BSA-002 Building Safety Act & Mandatory Occurrence Reporting Procedure. All staff must understand what constitutes a reportable occurrence and report concerns to their line manager or the Compliance Manager immediately. The Compliance Manager will assess whether a formal report to the BSR is required and will manage the reporting process. Records of all reportable occurrences and actions taken will be maintained in accordance with BSR requirements.

## SUPERVISION, MONITORING, AND SUBCONTRACTORS

In the context of the BSA, Eurosafes will supervise all work to ensure it is carried out safely and in compliance with Building Regulations. Only subcontractors who have completed Eurosafes pre-qualification process and appear on the Approved Subcontractor List will be engaged. Additional competence checks will be conducted for subcontractors involved in safety-critical or building-safety-related activities. Regular scheduled HSQE inspections will be carried out on site and corrective action taken where non-compliance is identified. Supporting Documents: ESL-POL-BSA-001 (Building Safety Act Policy), ESL-POL-BSA-002 (MOR Procedure), ESL-IMS-MAN-001 (IMS Manual).

## SECTION 3

### GENERAL ARRANGEMENTS

#### COMPETENCY & TRAINING

All employees of Eurosafes will be provided with training to ensure they are competent for their respective tasks, considering their qualifications and experience.

In the first instance the Senior Manager for the relevant department shall ensure that induction training is carried out for new employees on starting with Eurosafes. Induction training will include as a minimum the following information:

- Health & Safety Policy
- Familiarisation of the premises and key personnel.
- Reporting requirements
- First Aid provisions & emergency procedures

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- Security, fire and emergency procedures.
- Welfare and amenity provisions.
- Consultation arrangements.
- Relevant safe systems of work and safety rules.

The relevant Director shall then ensure that all other training needs are identified, arranged and monitored. The following are examples of specific training needs that may be required:

- First Aid
- Fire Safety
- CSCS Card
- Rooftop Training / Working at Height Awareness
- Harness Inspections
- Asbestos Awareness
- Manual Handling
- Site Management Safety Training
- Supervisors Safety Training
- Risk Assessment
- Abrasive Wheels

A training matrix detailing all employees training undertaken shall be monitored and updated as required by the relevant Manager. A copy of the training matrix can be produced on request.

In addition to formal training, Tool Box Talks will be undertaken on long term projects on subjects relevant to the works being undertaken, the subject & attendees will be recorded.

## COMMUNICATION & CONSULTATION

In accordance with the Health and Safety (Consultation with Employees) Regulations 1996 the Directors and the Compliance Manager will consult with all employees on health and safety matters. Employees should ensure any matters for consultation are brought to their attention either directly, or through their line/Contract Manager. All employees are encouraged to raise points of concern or suggestions for improvement with regard to health and safety matters. Typical matters for consultation include:

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- The provision of health and safety information and arrangements, including emergency procedures.
- The provision of health and safety training, and the introduction of new technologies or machinery.

A meeting chaired by the Compliance Manager, to include health, safety and welfare matters, will be held every 3 months or earlier if required, with a record kept of attendance, action points and/or comments raised. This meeting shall be attended by a Site Supervision representative, Managers and Director from each department in the business. Health and safety agenda items for the meeting will normally include:

- Update & Actions from last meeting
- Examination of accident/incident and/or disease statistics and trends.
- Examination of safety audit reports.
- Analysis of information and reports provided by enforcing authority inspectors.
- Review of external H&S Bulletins
- Development, introduction and monitoring of safety rules and SSOW.
- Appraisal of the effectiveness of health and safety training.
- Provision of safety and health communication and publicity in the workplace.

## SITE COMMUNICATION & COORDINATION

Eurosafe are committed to managing health and safety risks in a reasonably practicable manner and will consult with all relevant parties on site to ensure that hazards are eliminated or reduced so far as reasonably practicable, and control measures put in place to control risks.

All health and safety procedures shall be maintained up to date and relevant project information shall be communicated to site personnel during site induction. However, further communication on health and safety will be carried out by safety review meetings, toolbox talks and workplace briefings. These will be conducted prior to carrying out new work activities, where a change in activities is required or prior to high risk operations taking place.

All site personnel will be encouraged to discuss health and safety issues with the Supervisor and where this results in changes to working practices site personnel will be informed as necessary.

## NON - ENGLISH SPEAKING PERSONNEL

Whilst Eurosafe welcome non-English speaking personnel, our sites are “English Speaking” in respect of project communications. Therefore, where personnel speak or read limited English a risk assessment must be undertaken to demonstrate that measures are in place (at all times) to ensure such personnel are adequately safeguarded and do not pose unacceptable risk to themselves or others.

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## INCIDENT/ACCIDENT REPORTING

All employees & training delegates are made aware that all incident & accidents must be reported. Details of all incidents & accidents will be gathered by completing an accident report form in the first instance (in addition to the filling in of the Accident Book where an injury or loss has occurred if required). Following this the report shall be returned to the Head Office where it will be reviewed by the Compliance Manager and an accident or incident shall be investigated.

Eurosafe view accident investigation as a valuable tool in the prevention of future incidents & in the event of an accident resulting in injury and/or damage a report will be prepared detailing:

- The circumstance of the incident/accident including photographs & diagrams where possible
- The nature & severity of the injury and/or damage sustained
- The identity of the any witnesses
- The time, date & location of the incident/accident
- The date of the report

The investigation will be undertaken by the Compliance Manager and or Line Manager for the employee. Following the investigation any actions required as a result of the findings will be implemented & the action taken communicated to the workforce. The accident investigation flowchart is included in Appendix H.

## REPORTING OF INJURIES, DISEASES & DANGEROUS OCCURRENCE'S REGULATIONS 2013 (RIDDOR)

In the event of an accident involving an employee or training delegate which is reportable to the enforcing authority under the Reporting of Injuries, Diseases & Dangerous Occurrence's Regulations 2013 (RIDDOR) Eurosafe will take the following action:

- For Fatalities, Specified Injuries & Dangerous Occurrence's as detailed within the RIDDOR regulations these will be notified to the Health & Safety Executive (HSE) by the quickest possible means i.e. by telephone on 0345 300 9923.
- For work related injuries which result in an employee being absent from work or unable to do their normal job for more than 7 days and/or diagnosis of a specified Occupational Disease these will be notified to the HSE on-line at [www.hse.gov.uk/riddor/report.htm](http://www.hse.gov.uk/riddor/report.htm) (using form F2508 for injuries & F2508A for occupational diseases) within 15 days of the 7 day absence or diagnosis of the occupational disease.

The responsible person under RIDDOR is the Compliance Manager who will consult with our external H&S advisor on any reporting requirement.

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## FIRST AID

The Health and Safety (First-Aid) Regulations 1981 require employers to provide adequate and appropriate equipment, facilities and personnel to ensure their employees receive immediate attention if they are injured or taken ill at work.

Therefore to comply with this requirement Eurosafes will ensure that a fully stocked first aid kit will always be available at all worksites. The location of the accident book, first aid kit & the qualified first aiders along with the location of the nearest Accident & Emergency Hospital Department will be communicated to all employees/sub-contractors prior to commencement on site.

Drivers of Eurosafes vehicles for which they are responsible must ensure that a First Aid Kit is present & maintained with replacement of defective or missing items as required. Any items required should be reported to the office immediately by the vehicle driver.

Within the office details of the First Aider(s) & the location of the Accident Book & First Aid Kit will be displayed on the Health & Safety Notice Board

NB. Details of First Aid training undertaken are held in the Training Matrix

## FIRE & EMERGENCY

Fire precautions will be provided and maintained in accordance with the Regulatory Reform (Fire Safety) Order 2005, the Health and Safety at Work Act 1974, the Workplace (Health, Safety and Welfare) Regulations 1992, and the Fire Safety Act 2021. On construction sites, Eurosafes also complies with fire safety requirements under CDM 2015.

### EUROSAFE PREMISES

A fire risk assessment on all Eurosafes premises will be carried out, recorded, and reviewed regularly to ensure it remains valid and that control measures are effective. Following completion of the fire risk assessment, an emergency fire action plan will be implemented, taking into consideration all employees and visitors, including those with disabilities or mobility needs. Fire safety information and training will be provided for employees and others who may be affected.

Emergency evacuation procedures will be posted at strategic positions throughout all Eurosafes premises. Emergency evacuation drills will be conducted at least twice per year, with records maintained.

### EMERGENCY PROCEDURE - EUROSAFE PREMISES

The Compliance Manager, or in their absence a nominated deputy, will carry out the following duties:

- Instigate the safe evacuation of premises in the event of any emergency.
- Summon the emergency services when an incident is reported.
- Ensure all emergency exits are checked monthly.
- Test fire alarms weekly and record the results.
- Ensure access and egress to all buildings are kept clear of obstruction at all times.
- Ensure fire alarms, emergency lighting, and fire extinguishers undergo periodic testing and inspection by a qualified engineer, with records maintained.
- Ensure monthly testing of emergency lighting is carried out and recorded.
- Ensure bi-annual emergency evacuation drills are carried out at Eurosafes head office, with records maintained.

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## FIRE SAFETY ON CLIENT AND CONSTRUCTION SITES

When working on client or construction sites, Eurosafes will comply with the site-specific fire safety procedures established by the Principal Contractor or the Responsible Person for the building. All personnel will receive site-specific fire safety induction information, including evacuation routes, assembly points, alarm signals, and the location of firefighting equipment. Where this information is not available, the Site Supervisor becomes responsible for setting evacuation routes, assembly points between Eurosafes employees. Where Eurosafes is acting as the Principal Contractor, fire marshals will be appointed and trained. Eurosafes will coordinate with the building manager or Responsible Person to identify and communicate any fire risks arising from Eurosafes's work activities that may affect the building's existing fire precautions.

## COORDINATION BETWEEN EUROSAFES AND THE RESPONSIBLE PERSON

Two-way communication between Eurosafes's team and the building manager or Responsible Person is a key principle of fire safety management on occupied sites. Before work commences, Eurosafes will inform the building manager of any activities that could introduce new fire risks, affect escape routes, or impact existing fire detection, alarm, or suppression systems. Eurosafes will ensure the building manager informs Eurosafes of any existing fire risks, temporary fire precaution arrangements, or planned changes to the fire safety systems that may affect Eurosafes's team. Fire safety interface arrangements will be recorded and agreed in the project risk assessment and method statement, or the Construction Phase Plan, as applicable. Where works are planned in or near fire-protected compartments, Eurosafes will coordinate with the Responsible Person to maintain the integrity of compartmentation throughout the works.

## WHEN SUBCONTRACTORS MUST PRODUCE A SPECIFIC FIRE RISK ASSESSMENT

In most circumstances, Eurosafes and its subcontractors will work under the building's existing fire risk assessment. A specific fire risk assessment must be completed, however, when the work activity could:

- Introduce new ignition sources (for example, hot works including welding, cutting, grinding, use of blowlamps or hot air guns).
- Significantly increase the fuel load on or around the site (for example, accumulation of combustible packaging or materials from product installation).
- Affect or alter a building's means of escape (for example, replacement or alteration of an external fire escape, or temporary blocking of corridors or exit routes).
- Impair or interfere with fire protection systems or equipment (for example, works that could trigger, disconnect, or disable fire detection, fire alarm, or emergency lighting systems).

Outside of these trigger conditions, Eurosafes and its subcontractors will operate under the building's fire risk assessment. In all cases, the critical requirement is the coordination process described above. Where a specific fire risk assessment is required, it must be completed by a competent person before work commences, reviewed and approved by the Eurosafes Supervisor or Project Manager, shared with the building manager or Principal Contractor as appropriate, and reviewed and updated if the scope of works changes.

Hot works present the greatest fire risk in Eurosafes's operations. Full arrangements for the management of hot works are set out in the Hot Works section below.

## HOT WORKS

Hot works cover welding, cutting, grinding, brazing, soldering, torch-on waterproofing, use of blowlamps and hot air guns, and any other activity that produces sufficient heat or sparks to ignite surrounding materials. Hot works create significant risks including fire, explosion, burns, fumes, and ignition of hidden combustible materials. Eurosafes will avoid hot works wherever reasonably practicable by selecting alternative methods such as cold cutting, mechanical fixings, and prefabrication. Where hot works are necessary, they will be planned, risk assessed, and controlled using a robust safe system of work, including a Hot Works Permit where required.

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## LEGAL AND GUIDANCE CONTEXT

Hot works controls support Eurosafe's duties to manage workplace risk under the Health and Safety at Work Act 1974, to maintain appropriate fire precautions in accordance with the Regulatory Reform (Fire Safety) Order 2005, and, on construction sites, under CDM 2015. Where dangerous substances or potentially explosive atmospheres may be present, hot works must be managed to prevent ignition in accordance with the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR).

## PLANNING AND AUTHORISATION

Hot works must not start until:

- A suitable risk assessment and method statement (RAMS) is in place covering fire risk, fumes, and burns.
- The work has been authorised by a competent person (Supervisor, Site Manager, or the client's permit issuer, as applicable).
- A Hot Works Permit has been issued where required by the site, the client's rules, or the findings of the risk assessment.
- The permit has been checked to confirm it is current, correctly completed, and appropriate for the location and task.

## FIRE PREVENTION BEFORE WORK COMMENCES

Before hot works begin, the Supervisor must ensure all combustible materials within a minimum 5-metre radius of the work area are removed, wetted, or protected with fire-resistant blankets. Where this distance cannot be achieved, a risk-assessed alternative must be agreed before work starts. Floors, walls, and surfaces adjacent to the work area must be inspected for hidden combustibles, including voids, cavities, and service routes. Appropriate fire extinguishers must be available at the work location, not just in the nearest general area. The building's fire detection and suppression systems must be assessed, and where necessary, local detector heads may be temporarily isolated with the Responsible Person's agreement. Any isolation must be recorded on the Hot Works Permit, and systems fully reinstated once hot works are complete. A fire watch operative will be in place where required by the risk assessment or permit conditions.

## CONTROL DURING HOT WORKS

- Operatives must hold appropriate competency for the equipment in use.
- All hot works equipment must be inspected before use and maintained in accordance with PUWER and manufacturer recommendations.
- Fume and smoke must be controlled in accordance with COSHH. Adequate ventilation must be provided, and respiratory protective equipment (RPE) worn where required.
- PPE requirements include as a minimum fire-resistant gloves, face protection, and appropriate body protection for the specific task.
- Hot works must stop immediately if conditions change (for example, wind direction, accidental ignition, or detection of gas or vapour).

## FIRE WATCH AND POST-WORK INSPECTION

After hot works are complete, a fire watch must be maintained for a minimum of 60 minutes after the cessation of all hot work activities, or for the period specified on the Hot Works Permit, whichever is longer. The fire watch operative must inspect the work area and all adjacent spaces, including voids, cavities, and areas below the work point, for smouldering materials, smoke, or heat. The fire watch must be carried out by a competent person who is not engaged in other tasks during this period. Any fire detection systems that were isolated must be

fully reinstated

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and tested before the work area is vacated. The completed Hot Works Permit must be signed off by the authorising person and retained on site and in the project file.

## HOT WORKS PERMIT - MINIMUM REQUIREMENTS

A Hot Works Permit is required for all hot works on client sites and Eurosafes premises, unless specifically excluded by a written and signed risk assessment. As a minimum, the permit must record the nature and location of the hot works; the name of the authorising competent person; date, start time, and permitted end time; precautions in place before work commences (confirmed as completed); details of any fire systems that have been isolated; the duration of the fire watch and the name of the person responsible for it; and sign-off confirming fire watch completion and reinstatement of all fire systems.

## TRAINING AND COMPETENCE

All operatives undertaking hot works will have received appropriate training for the specific process and equipment involved, with records maintained in the Training Matrix. Fire Safety Awareness training will be provided to all relevant employees. All relevant personnel must understand the Hot Works Permit system and their responsibilities under it.

## CONFINED SPACES

Work in confined spaces carries a high risk of death or serious injury. Eurosafes will avoid entry into confined spaces wherever reasonably practicable, using alternative methods such as remote cameras, extended equipment, or external working positions. Where entry is unavoidable, it will only take place under a formal, planned safe system of work that includes a written risk assessment, a method statement, a Permit to Enter, appropriate atmospheric monitoring, and a tested emergency rescue plan. No confined space entry will take place without these controls being in place.

## DEFINITION AND CLASSIFICATION

Under the Confined Spaces Regulations 1997, a confined space is a place that is substantially enclosed, and where there is a reasonably foreseeable risk of serious injury from hazardous substances, conditions, or lack of oxygen arising from the nature of the space or the work carried out within it. Examples relevant to Eurosafes' operations include roof voids, ceiling voids, service ducts, tanks, vessels, silos, sewers, shafts, manholes, inspection chambers, tunnels, culverts, and any enclosed or partially enclosed space where ventilation is restricted. The identification of a confined space must be made by a competent person as part of the pre-work risk assessment. If there is any doubt as to whether a space is a confined space, it must be treated as one until a competent assessment confirms otherwise.

All identified confined spaces will be classified as either low risk (limited atmospheric or other hazards, controllable through basic precautions - but still requiring a permit to enter and a buddy system), or high risk (significant risk from oxygen deficiency or enrichment, flammable or toxic gases or vapours, free-flowing solids, excessive heat, or drowning). Entry into a high risk confined space requires a full confined space rescue team and emergency arrangements to be in place before entry commences.

## LEGAL FRAMEWORK

Eurosafes' confined space arrangements comply with the Confined Spaces Regulations 1997, the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999, the COSHH Regulations 2002 (for atmospheric hazards), and HSE guidance L101 Safe Work in Confined Spaces (Approved Code of Practice).

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## PRE-ENTRY PLANNING

Before any confined space entry, the following must be completed: a written risk assessment identifying all hazards associated with the space, the task, and the surrounding environment; a method statement setting out the sequence of work, controls, equipment, and emergency rescue procedure; a Permit to Enter issued by a competent Authorised Person confirming all pre-entry checks have been completed and the space has been declared safe for entry; and confirmation that the entrant(s), attendant, and rescue team (where required) are present, briefed, and competent for their role.

## ATMOSPHERIC TESTING

Atmospheric testing is mandatory before any entry into a confined space where there is a foreseeable risk of atmospheric hazard, and continuously during the work where the risk assessment requires it. Testing must cover oxygen level (safe working range 19.5% to 23.5%; entry outside this range requires appropriate breathing apparatus); flammable gases and vapours (below 10% of the Lower Explosive Limit before entry, with work stopping if levels reach 25% LEL); and toxic gases including carbon monoxide, hydrogen sulphide, and any other substance identified by the COSHH assessment. Testing must be carried out by a competent person using calibrated, certified gas detection equipment. Readings, times, and the name of the tester must be recorded on the Permit to Enter.

## ROLES AND RESPONSIBILITIES

- Authorised Person - the competent person who issues and signs the Permit to Enter, confirms all precautions are in place, and has authority to cancel entry if conditions change.
- Entrant(s) - trained personnel entering the confined space. Entrants must not enter until the permit is signed, and must withdraw immediately if conditions deteriorate or they are instructed to do so by the Attendant.
- Attendant - a trained person stationed outside the confined space at all times while any entrant is inside. The Attendant maintains continuous communication with entrants, monitors atmospheric conditions where required, and initiates the emergency rescue procedure if needed. The Attendant must not enter the space under any circumstances.
- Rescue Team - a trained confined space rescue team must be on standby before entry into any high risk confined space. The team must have practised the rescue procedure for the specific space type, have appropriate rescue equipment ready, and be positioned to respond immediately.

## EMERGENCY RESCUE

An emergency rescue plan must be prepared and agreed before every confined space entry. The plan covers the method of raising the alarm from within the space, communication between entrants and Attendant, the retrieval system (a rescue harness and lifeline must be worn by the entrant in all cases where this does not introduce a greater risk), the rescue team's role and positioning, the location of the nearest emergency services and the procedure for calling them, and the location of first aid equipment and any specialist rescue equipment. Non-entry rescue is always the preferred approach. Entry rescue by personnel who are not part of the trained rescue team is strictly prohibited.

## TRAINING AND COMPETENCE

All persons entering confined spaces must hold a recognised confined space entry qualification appropriate to the level of risk, as a minimum a BOHS P601 or equivalent for medium and high risk spaces. Attendants must hold a recognised confined space attendant qualification. Rescue team members must hold a recognised confined space rescue qualification and have completed regular practical rescue exercises. Training records are maintained in the Training Matrix, with refresher training and practical exercises conducted at regular intervals and after any

confined space

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incident. Subcontractors undertaking confined space work on behalf of Eurosafes must demonstrate equivalent competence and will be subject to pre-qualification checks against these standards.

## PERMIT TO WORK

A Permit to Work (PTW) is a formal documented safety procedure used to control high-risk work activities where the hazards are such that the work cannot be safely undertaken without a structured authorisation and control process. Eurosafes operates a Permit to Work system for specific high-risk activities and will comply with any client or Principal Contractor PTW system in place on site. The PTW system does not replace risk assessments and method statements - it works alongside them as an additional layer of control for the highest-risk tasks.

## SCOPE - WORK REQUIRING A PERMIT

The following activities require a Permit to Work when carried out by Eurosafes employees or subcontractors. Where a client or Principal Contractor operates their own PTW system for any of these activities, that system takes precedence and Eurosafes personnel will comply with it.

- Permit to Enter (Confined Spaces) - required for all entry into any space classified as a confined space under the Confined Spaces Regulations 1997. Full requirements are set out in the Confined Spaces section of this policy.
- Hot Works Permit - required for all hot works on client sites and Eurosafes premises. Full requirements are set out in the Hot Works section of this policy.
- Permit for Work on Electrical Systems - required for any work involving isolation of or work on electrical systems, switchgear, or live conductors, including work that requires isolation of fire detection or alarm systems, emergency lighting circuits, or any electrical circuit forming part of a life safety system. The permit must confirm that the circuit has been isolated, locked off, and tested as dead by a competent person before work commences. Live electrical work is prohibited except where demonstrated by a risk assessment to be absolutely unavoidable, in which case it must be carried out only by a qualified electrician with additional controls in place.
- Permit for Work at Height in Fragile or Unstable Environments - required where the working at height risk assessment identifies the roof or structure as fragile, structural integrity is unknown, or there is a risk of falling through the surface underfoot. The permit confirms that a structural survey or fragility assessment has been obtained, the access method and fall protection equipment are suitable, and the Authorised Person has reviewed and approved the method statement.
- Permit for Work Affecting Means of Escape or Fire Protection - required where works will temporarily impair a building's means of escape, fire compartmentation, fire detection, or suppression systems. This permit is coordinated with the building's Responsible Person and confirms the compensatory measures in place for the duration of the impairment, including any requirement for a fire watch or enhanced evacuation arrangements.

## GENERAL REQUIREMENTS

Regardless of the type of permit, all Permits to Work issued under Eurosafes's system must be in writing and completed in full before work commences (verbal permits are not acceptable); identify the specific location and nature of the work, the date, the permitted start time, and the permitted end time or completion condition; be issued and signed by a competent Authorised Person with the authority and technical competence to assess the risks; be received and countersigned by the person in charge of the work (the Permit Holder), confirming they understand the conditions and will comply; list all precautions and controls that must be in place before work starts, with confirmation that each has been completed; include a clear procedure for suspension, cancellation, and handback; be cancelled and re-issued if the scope of work changes, the

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permitted time expires, or there is any interruption that could affect safety; and be retained on site and in the project file once completed.

## ROLES AND RESPONSIBILITIES

- Authorised Person - the competent person responsible for issuing the permit, confirming controls are in place, and signing it off on completion. The Authorised Person must have specific knowledge of the hazards associated with the work type, be independent of the working team where practicable, and have the authority to suspend or cancel the permit if conditions change.
- Permit Holder - the person in charge of the work who receives the permit, confirms understanding of all conditions, ensures the work team is briefed, and is responsible for compliance with the permit conditions throughout the task. The Permit Holder must not allow work to proceed beyond the scope or time limits of the permit.
- Compliance Manager / Site Manager - responsible for maintaining the PTW system, ensuring permits are correctly completed and retained, and reviewing the effectiveness of the system as part of routine H&S audits.

## COMPLIANCE WITH CLIENT PTW SYSTEMS

Many of Eurosafes clients and Principal Contractors operate their own Permit to Work systems. Where this is the case, Eurosafes personnel must comply fully with the clients PTW system requirements. Eurosafes own permit is not required in addition to the clients permit, provided the clients permit covers the same scope of controls. The Project Manager or Supervisor must confirm during pre-construction planning whether a client PTW system is in place, and brief the team accordingly during site induction. Where a client PTW system exists but does not cover a specific high-risk activity relevant to Eurosafes scope, Eurosafes own permit must be used to fill that gap.

## TRAINING

All personnel who act as Authorised Persons or Permit Holders must be trained in the Eurosafes PTW system and in the specific permit type relevant to their role. Training must be recorded in the Training Matrix. Personnel who have not received PTW training must not issue or accept permits.

## MONITORING & AUDITING

Eurosafes recognise the importance of regular monitoring & audit therefore will ensure our policy & procedures & work operations are monitored accordingly. The Health & Safety Policy & its contents will be reviewed as a minimum on an annual basis with assistance from our external Health & Safety Advisors. The H&S Policy will also be subject to review following any significant changes to the business or legislation.

Health & Safety Inspections will also be undertaken on our premises & work activities. Our premises will be subject to an annual Workplace Inspection, this will be undertaken by the Compliance Manager with assistance from our Compliance Manager.

Our work activities will be monitored on a daily basis by our Supervisors. Contracts with a duration of over two weeks will be subject to a weekly H&S Site Inspection (using the Site Inspection form). As required a formal Health & Safety Inspection will be also be undertaken by the relevant Site Manager. The findings from these inspections will be reviewed & where necessary remedial actions agreed with the Group CEO.

Employees are encouraged to bring to the attention of their immediate line manager areas in which, in their opinion, this policy appears inadequate. All such comments will be passed to the Compliance Manager & discussed for consideration & review at the Health & Safety Meeting.

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## WORK EQUIPMENT (PUWER)

The Provision and Use of Work Equipment Regulations 1998 (PUWER) require extensive precautions to be taken to ensure the continued safety of employees whilst operating or maintaining work equipment of all types. Only competent persons who have been trained and are adequately supervised are permitted to use plant, machinery & equipment.

Therefore Eurosafe will endeavour to ensure that all equipment used in the workplace is safe & suitable for the purpose for which it is to be used.

All plant and equipment operators are reminded that it is their responsibility to:

- Work and behave safely at all times.
- Obey all company health and safety rules.
- Ensure equipment is properly guarded when used.
- Ensure the working area is kept clean, clear and tidy.
- Know what to do in an emergency.
- Take action following an accident or near miss.

The following general precautions are to be observed by all employees operating plant and machinery:

- Report all defects or faults with equipment as soon as possible.
- Always wear the correct PPE and suitable clothing.
- Always ensure the equipment is switched off, isolated and immobilised before carrying out cleaning or maintenance operations.
- Always use the correct tool for the job, ensure the tool is in good condition, and use it the right way.

The Manager for each section is responsible for the identification of all plant & equipment for their team & the Asset & Fleet Manager is responsible for ensuring that all identified checks & maintenance requirements are implemented.

Work equipment shall be subject to visual inspection before each use & additional checks eg. PAT testing & other maintenance requirements in line with manufacturer's recommendations. Further details on user checks & maintenance of work equipment is included in Appendix A.

NB. 'Portable Appliances' are generally defined as appliances that have a lead or cable & plug & which will normally be moved around or are easily moveable from place to place.

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Equipment	Visual Inspection	Formal Inspection
Hand Tools	Yes	N/A
General Equipment	Yes	3 Monthly Defect Inspection (for equipment not covered under other statutory inspection regime)
Power Tools	Yes	PAT Testing (3 monthly)
Plant	Yes	As per Manufacturers Recommendations
Lifting Plant	Yes	As per Manufacturers Recommendations & LOLER

Should any defect be found with any work equipment this should be reported to the Supervisor or Manager immediately, the equipment removed from general use & reported to the Asset & Fleet Manager to allow repair or replacement (any items requiring repair/replacement must be dealt with as soon as possible).

All employees shall be provided with adequate information, instruction & training to enable them to use work equipment safely.

## WORKING AT HEIGHT

Eurosafe will comply with its duties under the Work at Height Regulations 2005 (WAHR), as part of its risk assessment procedures. All work at height will be thoroughly assessed by a competent person and alternatives to working at height will always be considered. The use of ladders for any work at height will only be approved where other more suitable work equipment is not considered to be appropriate.

Eurosafe recognise that working at height activities are core to the business and as such we have produced a standalone working at height policy available on request.

The hierarchy of control measures listed in the Work at Height Regulations are:

- Avoid work at height
- Prevent any person from falling
- Use an existing place of work which complies with Schedule 1 of the Regulations
- Use work Equipment
- Mitigate falls by using work equipment to minimize the distance and consequences of a fall
- Where work equipment does none of the above, provide additional training and instruction or other suitable measures

The above hierarchy will be considered during the preparation of risk assessments and method statements to ensure that safe systems of work which comply with the WAHR are established and implemented. Other factors such as the location and duration of the work; the weather conditions; the task to be carried out and the experience and competence of the individual should also be taken into consideration.

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As the majority of our works involves working at height in addition to the above suitable training shall be provided to all Supervisors & Operatives on safe working at height practices, the equipment & PPE required e.g. harness & lanyard and training on the rescue procedures to be followed in an emergency.

This policy and its arrangements allows the use of ladders. A ladder / step ladder should be referred to as a temporary measure which may be used as a working platform for no more than 30 minutes. However for works of longer duration other suitable working at height equipment should be selected taking into account the factors detailed in the hierarchy of control measures above.

Ensure that only properly marked class 1 industrial equipment is used for working at height. Domestic grade ladders and step ladders must **NOT** be used, all ladders & working at height equipment to be used must be of the correct type for the specific task, should be inspected before use, subject to regular checks and maintenance, and meet appropriate legislative and equipment standards. These are summarised below:

- Keeping wooden ladders free of paint or any other coating which could hide cracks or splits
- Marking of ladders with a unique number to aid recognition
- Securing and footing of ladders as soon as possible after erection
- Use of ladders at the correct angle (75 degree from horizontal)
- Provision of ladder attachments as necessary
- Marking of safe zones around working at height equipment & ladders where persons are working above or below ground, plus use of barriers and warning notices
- Test/Inspection Certification for MEWPS
- Scaffolding and Scaffold towers only erected/alterd by suitable trained personnel.

HSE guidance 'Safe Use of Ladders & Step Ladders' (INDG455) are issued to all employees who use ladders as part of their work.

## PERSONAL PROTECTIVE EQUIPMENT

All employees who may be exposed to a risk to their health & safety while at work will be provided with suitable, properly fitting & effective personal protective equipment.

Minimum standard issue will include safety footwear, safety helmet, high visibility vest and hand, eye & respiratory protection when required. Other specialist safety clothing and equipment e.g. Harness, Lanyard etc. will be issued as works dictate through risk assessment and the safety method statement. Equipment is provided without charge to all direct employees & a record kept when PPE is issued.

All persons issued with protective clothing, or equipment are responsible for maintaining it in a satisfactory condition and must immediately report to their Line Manager any loss or defects to allow replacement as necessary (damaged equipment or PPE **MUST NOT** be used at any time).

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## MANUAL HANDLING OPERATIONS

Eurosafes recognises that manual handling activities need to be appropriately and effectively managed to reduce any potential health risks. All significant manual handling activities will be assessed and where necessary appropriate control measures put in place which focuses on avoiding manual handling and the provision of mechanical lifting aids.

All persons involved in manual handling will be informed of the hazards associated with manual handling and trained in good lifting techniques.

All manual handling will be in accordance with the Manual Handling Operations Regulations 1992 and HSG 149 Backs for the Future - safe manual handling in construction.

Further details are included in Appendix A.

## ASBESTOS

Asbestos containing materials (ACM's) were used in the construction industry for many years primarily to deter the spread of fire or for their insulation properties. Therefore, asbestos may be present in a wide variety of products including: ceiling/wall boards; suspended ceiling tiles; floor tiles; soffit boards; roof panels; fire insulation; pipe lagging; boiler lagging; bitumen adhesives; door panels etc. Although the use of such materials is now prohibited by legislation, they may still exist in many older premises.

It is Eurosafes aim therefore to prevent exposure to asbestos or ACM's so far as is reasonably practicable & protect the health, safety & welfare of our employees. Before works commence records regarding asbestos present shall be consulted (Asbestos Register, Asbestos Surveys) to ensure that the works are suitably planned to avoid exposure or disturbance.

However, during works, should any employee suspect that a material they are working on, or are about to work on may contain asbestos, then they should stop work immediately & follow the procedure detailed in Appendix G including securing the area to prevent others from entering and inform their Supervisor immediately so that further investigations may be carried out.

The actions to be taken on discovery of Asbestos or ACM's will be communicated to employees during Induction & a copy of the Asbestos Essentials guidance EM1 provided. A flow chart detailing the action to be taken is also included in Appendix I.

Under the Control of Asbestos Regulations 2012, all persons involved with building; construction; installation of services and pipework etc; maintenance; refurbishment; repair of existing structure where asbestos may be present, must be provided with compulsory Asbestos Awareness Training.

Details of Asbestos Awareness training undertaken is detailed in the Training Matrix

## NOISE

Noise is covered by the Control of Noise at Work Regulations 2005. Therefore, Eurosafes will ensure that all tasks and work activities will be arranged to take the requirements of these regulations into account. Where noise is identified as potentially nearing the lower exposure action level a noise assessment will be undertaken by a competent person to establish the noise level so suitable action can be taken.

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Where noise in the workplace reaches the lower exposure action value of 80dB(a), operatives will be given information regarding the risk of exposure to noise & suitable ear protection will be made available for use. Where noise in the workplace reaches the upper exposure action level of 85dB(a) action will be taken to reduce the exposure to the noise & the wearing of suitable ear protection will be mandatory to prevent any possible hearing damage. Signs will be displayed to identify hazardous areas of the workplace. Where the noise assessment levels indicate, it is required health surveillance for employees affected will be undertaken.

## VIBRATION

Vibration is covered by the Vibration at Work Regulations 2005. Therefore, Eurosafe will ensure that all tasks and work activities will be arranged to take the requirements of these regulations into account.

Hand Arm Vibration (HAV) is vibration transmitted into the hands and arms when using hand-held, powered work equipment. Excessive exposure to HAV can cause hand-arm vibration syndrome (HAVS) & Carpal Tunnel Syndrome therefore exposure to vibration should be monitored. The exposure action value (EAV) for hand arm vibration is a daily exposure of  $2.5 \text{ m/s}^2$ . The exposure limit value (ELV) for hand arm vibration is a daily exposure of  $5 \text{ m/s}^2$ .

Initial & Annual HAV screening will be undertaken & information will be provided to employees regarding the risks of exposure to vibration & action taken to reduce exposure to HAV eg. low vibration tools, regular maintenance etc. Where a potential problem is identified the risk will be assessed & the necessary action taken to reduce exposure. Where the HAV Screening indicates a potential issue external health surveillance for employees affected will be undertaken.

## CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

The regulations for control and the safe use of all materials, chemicals and substances are covered by the Control of Substances Hazardous to Health Regulations 2002.

General Guidelines to be applied are covered in HSE Guidance Notes of which there are a great variety published. Those more specific to the Construction Industry include:

EH 44 - Dust, general principles of protection

EH 54 - Assessment of exposures to fumes from welding and allied processes

GS 5 - Entry into confined spaces

No assessment can be carried out without reference to EH 40 - Occupational Exposures Limits. Such limits are constantly reviewed and the latest limits should always be checked when undertaking any assessment. Other information is contained in the Construction Industry Advisory Committee publications, the HSE Construction Information Sheets and the HSE COSHH Essentials Website.

All work will be planned to take the above standards and guidance into account. The Supervisor will ensure that, before operatives are set to work, they are instructed in the safe use of any product they are using in accordance with the written assessment and manufacturer's instructions. He will take into account the circumstances and conditions in which the substance is being used & ensure that any necessary protective clothing or equipment is provided and used.

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Managing hazardous substances and complying with the COSHH Regulations requires Eurosafe to take the following steps to comply with the regulations:

- Identify the problem
- Assess it, measure it and establish the likely risks and hazards.
- Decide on the method of solving the problem. (ie: Alternative product, method of working or personnel protective equipment)
- Implement the chosen method of solving the problem, ensuring that all necessary equipment is present and precautions are implemented.
- Check and control the works to ensure that the method is being implemented properly. Monitor the outcome to ensure compliance with the requirements and objectives.

Employees will be made aware of the hazards of any materials they will be asked to use, material safety data sheets will be issued for each product and control methods will be devised. Eurosafe will keep records of all assessments, data sheets and medical surveillance as required in the regulations. These assessments will be reviewed at regular intervals to ensure that they are up to date and still relevant.

## DISPLAY SCREEN EQUIPMENT (DSE)

The risk posed to office staff using DSE shall be assessed and controlled in accordance with the Health & Safety (DSE) Regulations 1992 as amended by the Health and Safety (Miscellaneous Amendments) Regulations 2002 and the Management of Health & Safety at Work Regulations 1999. The aim of such assessments is to prevent work related upper limb disorders (WRULD), lower back problems, eyestrain, stress and repetitive strain injury (RSI).

Eurosafe does not underestimate the impact of such factors (if adverse) on the health of employees and shall endeavour to control such risks as is reasonably practicable.

All workstations should be subject to a DSE assessment, this should be carried out by a competent person and the findings of the assessment shall be communicated to those affected.

The safe use of Display Screen equipment and workstations in general are covered in the Health and Safety (Display Screen Equipment) Regulations 1992 as amended by the Health and Safety (Miscellaneous Amendments) Regulations 2002. Further information & guidance is contained in INDG 36 Working with display screen equipment (DSE)

The use of display screen equipment and workstations should be planned so that there are regular breaks or changes of activity. All display screen equipment and workstations should be subjected to a specific risk assessment and any identified risks should be dealt with appropriately.

Ensure that workstations satisfy the minimum requirements which are set for the display screen itself, keyboard, desk and chair, working environment and task design and software. Display screens, seating and workstations should all be fully adjustable to suit the individual.

The company will provide all information and training necessary to comply with the relevant regulations.

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## YOUNG PERSONS

Eurosafe recognises that young people may be more at risk to their health and safety at work due to lack of experience, lack of awareness of existing risk or immaturity.

## DEFINITIONS

- Young person - An employee or work placement student who has not attained the age of eighteen.
- Child - Person who is not over the compulsory school leaving age (16)

The 'Health and Safety at Work etc Act 1974' requires employers to secure the health and safety of all employees at work and anyone else who may be adversely affected by the employer's undertaking, so far as is reasonably practicable.

The 'Management of Health and Safety at Work Regulations 1999' require employers to assess work-related risk of all their employees, and require a specific assessment of risks to young persons.

Usually, the measures taken to protect the workforce as a whole should be sufficient to protect young persons. However, where this is not the case additional measures should be determined and implemented before the young person commences work. In extreme cases this may mean prohibiting young persons from certain work activities.

The young person has the right to expect that the employer has undertaken a suitable risk assessment. Employers must also provide the young person or the parents or guardians of children in employment with comprehensive and relevant healthy and safety information on the risk assessment and associated preventative and protective measures.

Under the Health and Safety at Work etc Act 1974 employees have a responsibility for their own health and safety. This needs to be significantly emphasised to young persons as they are potentially more likely to 'mess about' or play practical jokes, etc without being aware of the possible consequences.

The "Management" Regulations require employers to take the following factors into account when undertaking a young person's risk assessment:

- their inexperience and immaturity
- their lack of awareness of risks to their health and safety
- the fitting out and layout of their workstation and workplace
- the nature, degree and duration of any exposure to biological, chemical or physical agents
- the form, range, use and handling of work equipment
- the way in which processes and activities are organised
- any health and safety training given or intended to be given
- risks associated with certain specified agents, processes and work activities

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## LONE WORKING

Lone working activities must be avoided wherever practicable however in the event of employees being required to work alone, the following is mandatory:

- Access to means of communication (mobile phone or radio device in areas without signal)
- The employee is required to inform the Eurosafes office of where they are going and for how long. Details of the employees whereabouts, duration etc should be recorded.
- No employee shall enter a site alone if there is a significant risk of the site being occupied by unauthorised persons liable to commit acts of violence if disturbed.
- When working alone only ground level working is permitted
- No employee shall enter a site alone if the state of the premises is unknown and a risk of falling due to unsound structural materials exists.
- Employees are required to call the office on a regular basis to confirm their whereabouts.

## VIOLENCE AND HARASSMENT

Eurosafes recognises that by the nature of the business, employees are required to work in a range of different environments, some of which may pose a risk of verbal abuse and in extreme cases, physical assault. The company is aware of its obligations under the HSWA 1974 to ensure both the mental and physical health of employees as affected by systems of work. The risk of such instances are to be controlled by arrangements including:

- Constant supervision by site foremen/Supervisors in high risk areas of sites such as prisons, or sites occupied by persons suffering from mental ill health.
- Employees are instructed to diffuse potential hostile attacks by remaining calm, summoning assistance and/or leaving the area when safe to do so.
- Incentives to violent attacks should be reduced by avoiding exposure of valuable items (mobile phones, equipment etc) in public areas as far as possible.
- Any hostile act towards employees, whether verbal or physical, shall be taken seriously and immediately reported to the Group CEO and recorded as an incident in the accident book. These occurrences shall be monitored by the Managing Director. Physical assaults shall be notified to the HSE as a 'dangerous occurrence' under RIDDOR 2013.
- Any employee suffering emotional distress due to acts of violence should report this to the management who shall offer counselling and assistance as is necessary.

## HEALTH SURVEILLANCE

Eurosafes will ensure that all employees are provided with health surveillance if deemed appropriate, due to hazards identified by detailed risk assessments. Once it has been decided that health surveillance is appropriate, it will be maintained during the employees employment unless the risk to which the worker is exposed and associated health effects are short term. Health surveillance will be recorded on individual

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records. Surveillance may include:

- Inspections of readily detectable conditions by a competent person
- Enquires about symptoms, inspection and examination by a qualified person
- Medical surveillance, which may include clinical examinations
- Biological effect monitoring

The frequency of the use of such methods will be determined either on the basis of suitable general guidance or on the advice of a qualified practitioner.

## MENTAL HEALTH & WELLBEING

Eurosafes recognises that mental health and wellbeing are equally as important as physical safety. Work-related stress, anxiety, fatigue, and poor wellbeing can adversely affect personal health, team performance, and safety-critical decision making. Eurosafes is committed to promoting positive mental health, reducing work-related stress, and supporting any employee experiencing mental ill-health. These arrangements support Eurosafes's obligations under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999, and are integrated with the occupational health framework of ISO 45001.

### MANAGING WORK-RELATED STRESS

Eurosafes will use the HSE Management Standards approach (demands, control, support, relationships, role, and change) to identify and manage the risk of work-related stress. Work activities will be planned and resourced to avoid unreasonable workloads and time pressures wherever practicable. Roles, responsibilities, and expectations will be clearly communicated to all personnel. Reasonable working hours will be promoted, with adequate rest breaks encouraged and fatigue managed through planning, breaks, and the provision of accommodation where required. Lone working arrangements will be monitored to reduce isolation.

### SUPPORT, RECOGNITION, AND REPORTING

Managers and Supervisors will be trained to recognise early signs of stress or poor wellbeing and to respond appropriately. An open-door policy is promoted, and all personnel are encouraged to raise concerns relating to workload, stress, or wellbeing with their line manager, HR, or any Director. Where appropriate, Eurosafes will consider flexible working, task adjustments, or temporary adjustments to duties. Any employee experiencing mental ill-health is encouraged to inform their line manager so that appropriate support can be arranged. Mental health and wellbeing topics will be included in briefings and toolbox talks where appropriate.

### CRITICAL INCIDENTS AND POST-INCIDENT SUPPORT

Following any serious incident, near miss, or other challenging situation, Eurosafes will review the impact with affected personnel and make appropriate support available. This may include access to external wellbeing resources, Employee Assistance Programme services where provided, or onward referral to occupational health. Records of incidents, near misses, and the support provided will be maintained by the Compliance Manager.

## ENVIRONMENTAL

Eurosafes is certified to ISO 14001:2015 and is committed to preventing pollution, minimising environmental impact, and complying with applicable environmental legislation including the Environmental Protection Act

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1990 and the Environmental Permitting (England and Wales) Regulations 2016. Environmental management is integrated with health and safety and quality management within Eurosafes' Integrated Management System (IMS) and is led by the Compliance Manager.

## ENVIRONMENTAL ASPECTS AND IMPACTS

Eurosafes maintains an Environmental Aspects and Impacts Register identifying the significant environmental aspects of its activities, products, and services. Principal aspects considered include waste generation and disposal, use of materials and resources, energy and water consumption, emissions to air from vehicles and site activities, potential for soil or water contamination from spills, and noise and disturbance to neighbours. The register is reviewed at least annually and whenever activities change significantly.

## OPERATIONAL CONTROLS

- Waste - waste will be segregated at source wherever practicable, with hazardous waste managed in accordance with the Hazardous Waste Regulations 2005. Only licensed waste carriers will be used, and waste transfer notes and consignment notes will be retained as required. Waste minimisation will be considered at the planning stage of all projects.
- Spills and pollution prevention - all sites will hold suitable spill response materials appropriate to the substances in use. Fuels, oils, and hazardous substances will be stored in accordance with the Control of Pollution (Oil Storage) (England) Regulations 2001 and relevant COSHH assessments. Any spill must be contained and reported to the Supervisor immediately; significant pollution incidents will be reported to the Environment Agency as required.
- Resource efficiency - Eurosafes will consider energy and water efficiency in the selection of plant, equipment, and working methods. Sustainable procurement principles will be applied where reasonably practicable.
- Neighbour impact - noise, dust, and disturbance will be controlled to minimise impact on neighbouring occupants and the public. Site-specific controls will be set out in the project risk assessment and method statement.

## TRAINING AND COMMUNICATION

All employees will receive environmental awareness as part of their induction and refresher training. Environmental incidents, near misses, and improvement opportunities are reviewed alongside health and safety performance at the quarterly H&S meeting. The detailed operational arrangements for environmental management are set out in the Eurosafes Environmental Policy (ESL-POL-ENV-001) and the IMS Manual (ESL-IMS-MAN-001).

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## SECTION 4

### APPENDIXES

#### APPENDIX A

##### MANUAL HANDLING

A manual handling operation is defined as any transporting or supporting of a load (including lifting, putting down, pushing, pulling, carrying or moving) by hand or bodily force. Where an implement is being handled in the process of using it for its intended purpose, that task does not count as a manual handling operation.

A load is defined as any item or object that is being transported or supported, including a person or animal.

Injury from manual handling operations does not include injury caused by the inherent properties of substances that may spill from or contaminate the surface of the load. Common injuries include sprains and strains, amputations, cuts and bruises, disc and muscle injuries.

General safe manual handling procedures include storing heavy objects low down in racks, keeping high racking for light objects, adopting the correct lifting procedure, wearing the correct clothing and PPE, and using mechanical assistance wherever possible. In addition to the information given below regarding good handling, all employees are reminded not to move heavy or awkward loads unless:

- Mechanical handling aids can be used, or
- Assistance from another person is available, and
- The correct manual handling techniques are used.

A specific risk assessment is to be carried out and recorded for all manual handling tasks where there is a risk of injury.

##### Good Handling Techniques

Some important points for safe handling using a basic lifting operation as an example:

- Plan the lift. Where is the load to be placed? Use appropriate handling aids if possible. Is help required with the load? Remove obstructions such as discarded wrapping materials. For a long lift, such as floor to shoulder height, consider resting the load mid-way on a table or bench in order to change grip.
- Position the feet. Feet apart, giving a balanced and stable base for lifting (tight skirts and unsuitable footwear make this difficult). Leading leg as far forward as is comfortable.
- Adopt a good posture. When lifting from a low level, bend the knees. Do not kneel or over flex the knees. Keep the back straight (tucking in the chin helps). Lean forward over the load if necessary to get a good grip. Keep the shoulders level and facing in the same direction as the hips.

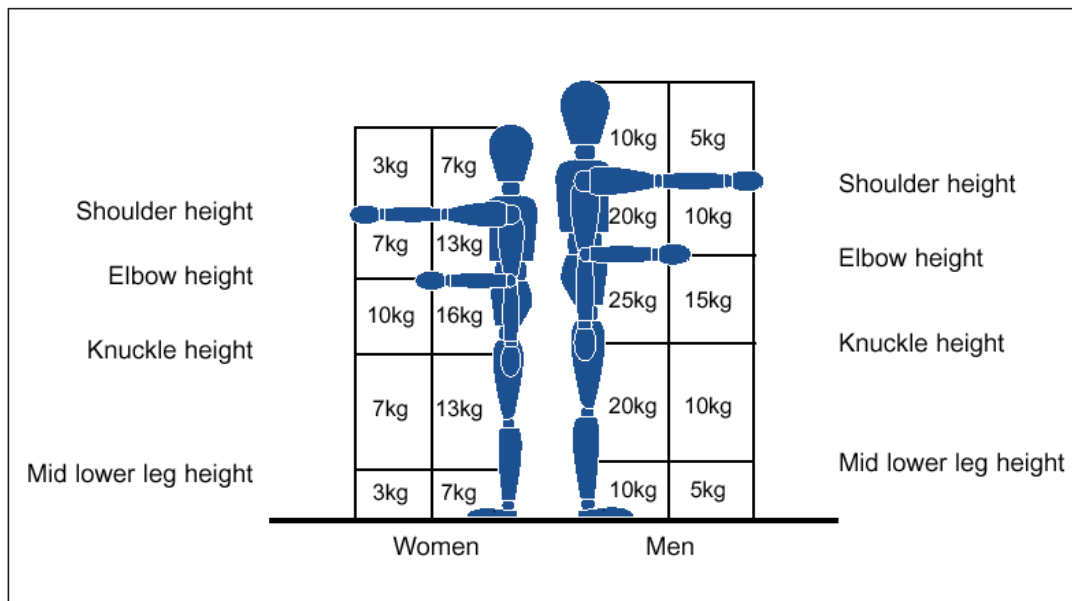
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- Get a firm grip. Try to keep the arms within the boundary formed by the legs. The best position and type of grip depends on the circumstances and individual preference, but it must be secure. A hook grip is less tiring than keeping the fingers straight. If there is a need to vary the grip as the lift proceeds, it should be done as smoothly as possible.
- Keep close to the load. Keep the load close to the trunk as long as possible. Keep the heaviest side of the load next to the trunk. If a close approach to the load is not possible, slide it closer to the body before trying to lift.
- Don't jerk. Lift smoothly, keeping control of the load.
- Move the feet. Don't twist the trunk when turning to the side.
- Put down, and then adjust. If precise positioning of the load is necessary, put it down first, then slide it into the desired position.

All employees are to report any manual handling tasks where it is not possible to meet the above requirements, and any physical condition that affects their ability to lift safely.

## GUIDELINE WEIGHTS FOR MANUAL HANDLING OPERATIONS





## APPENDIX B

### WORK EQUIPMENT - MAINTENANCE

#### MAINTENANCE

All work equipment is to be suitably maintained so that its performance does not deteriorate to the extent that it puts people at risk. The extent and complexity of maintenance will vary enormously, from simple checks on hand-held tools (for example to identify loose heads of hammers or splayed mushroom heads on chisels) to a planned maintenance programme for plant.

The frequency at which equipment needs to be checked is dependent on the equipment itself and risk assessments are to be carried out to identify this, taking into account:

- Intensity of use (frequency and maximum working limits).
- Operating environment (outdoors etc).
- Variety of operations (same task all the time or does it change).
- Risk to health and safety from malfunction or failure.

Maintenance work is only to be carried out by those who have received adequate information, instruction and training relating to that work, including the reasons for the maintenance activities as well as the procedures and techniques which are to be applied. The following general precautions are to be observed by all persons carrying out maintenance on work equipment:

- Work on electrical circuits/systems is only to be carried out by persons who are competent to do so and who are authorised by a Manager. Live electrical work is forbidden.
- Good maintenance practices are to be strictly observed including the use of permits, isolating and locking off power sources, locking off controls etc.
- Cutting corners or taking other short cuts in maintenance procedures is not acceptable practice at any time or for any reason.
- The defect/hazard reporting procedure is to be strictly observed by all employees and regularly monitored by management.

In addition to any requirement to carry out maintenance under PUWER, other legislation may set out minimum requirements for maintenance or for inspection or test. Examples are specific requirements for hoists, lifts, scaffolds and control measures such as ventilation plant.

A record of maintenance is to be kept for all plant & equipment to provide information for future planning and to inform maintenance personnel and others of previous action taken.

Maintenance procedures are to be carried out in accordance with any manufacturers specifications, for example periodic lubrication, replacement and adjustment of parts.

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## HIRED EQUIPMENT

All plant and equipment hired for use at Eurosafe is to be thoroughly checked for serviceability before use & the checks recorded. All employees are to ensure they are fully conversant with operating controls and procedures, and have received instruction before using hired equipment.

Employees who have responsibility for the collection or receipt of hired equipment are to ensure they are in possession of operating manuals, service and maintenance details, and records of thorough examination and testing where applicable, before accepting the equipment.

Clear responsibilities are to be established in the hire contract for safety-related maintenance by the person responsible for hiring the equipment in conjunction with the hire company.

## NEW PLANT AND MACHINERY

Before being used for the first time, all plant and machinery at Eurosafe is to be:

- Properly installed and commissioned with certification obtained from the supplier or installer where appropriate.
- Subject to a risk assessment to identify hazards and appropriate control measures.

Prior to first use, adequate information, instructions and training is to be given to plant and equipment operators, with regard to their experience and/or qualifications.

## HAND TOOLS

The following general precautions are to be observed by all employees who use hand tools:

- Hammers - do not use with split, broken or loose shafts, and worn or chipped heads.
- Files - these should have a proper handle and never be used as levers.
- Chisels - the cutting edge should be sharpened to the correct angle, the head of cold chisels must not be allowed to spread to a mushroom shape - grind off the sides regularly.
- Screwdrivers - never use them as chisels, and never use hammers on them - split handles are dangerous.
- Spanners - avoid splayed jaws and scrap any that show signs of slipping, do not improvise by using pipes, etc, as extension handles.
- Power Tools

A variety of hand-operated power tools are used on a daily basis. In addition to instructions given elsewhere in this manual, the following general precautions are to be observed by all employees when using such equipment:

- Hold the equipment securely.
- Take care when operating the trigger.

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- Keep cables away from cutting surfaces etc and avoid long runs of extension cables.
- Do not attempt to replace blades, bits or carry out maintenance whilst the tool is connected to the power supply.
- Do not touch blades, edges of materials etc immediately after use/contact, as they will be hot.
- Inspect equipment for damage, faults etc before use and report problems found.
- Wear PPE as required (dust mask, goggles etc).
- Do not operate electrical tools in wet or damp environments unless they are specifically designed to do so.
- Always use tools as intended and follow the manufacturer's instructions.

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## APPENDIX C

### RISK ASSESSMENT

The methodology for carrying out a risk assessment uses the HSE's five-step approach:

1. Step 1: Identify the hazards.
2. Step 2: Identify all those who may be affected by the hazards and how.
3. Step 3: Evaluate the risks and decide whether existing precautions are adequate or more should be done.
4. Step 4: Record the findings.
5. Step 5: Monitor and review the assessment and revise it if necessary.

The risk rating for each hazard is calculated by multiplying Severity (consequence of harm) by Likelihood (probability of occurrence) on a 5x5 matrix, consistent with the scoring system used in Eurosafe's operational documentation. The resulting score determines the risk priority level and the action required.

### RISK MATRIX

		Likelihood				
		Very unlikely	Unlikely	Possible	Likely	Very likely
Severity	Negligible	1	2	3	4	5
	Minor	2	4	6	8	10
	Moderate	3	6	9	12	15
	Major	4	8	12	16	20
	Extreme	5	10	15	20	25

□

Score	Priority	Action
1 to 4	Low	Low risk identified – Control measures to be implemented and PPE to be worn.
5 to 12	Medium	Medium risk identified – Control measures to be implemented, PPE to be worn, and team level supervision in place.
15 to 25	High	High risk identified – Control measures must be implemented, PPE to be worn, rescue plans available where necessary, and isolation / permit procedures in place if required. Management supervision should be in place, and protection of the wider public is also paramount.

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## RISK RATING AND REQUIRED ACTION

Risk control measures must be identified and introduced in accordance with relevant legislation and published standards, applying the following hierarchy:

6. Eliminate the risk completely wherever possible.
7. Substitute for a less dangerous approach.
8. Combat risks at source through engineering controls.
9. Apply collective control measures before individual controls.
10. Implement administrative controls and safe systems of work.
11. Provide appropriate PPE as a last line of defence, not a substitute for other controls.

## REVIEW AND RECORDS

Risk assessments must be reviewed when changes take place in the workplace, staffing arrangements, or working methods; following the introduction of new machinery, hazardous substances, or work practices; and following any incident or near miss, or where there is reason to suspect the assessment is no longer valid.

Records of all risk assessments must be maintained and made available to relevant personnel. Any changes or amendments must be communicated to all affected employees before work restarts. The completion of a risk assessment will normally require the development of a Safe System of Work to ensure that work activities are carried out with appropriate control measures in place.

Eurosafe have considered the risks their operations could have on third parties, members of the public, and clients as part of our Risk Assessment process.

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## APPENDIX D

### SAFE SYSTEM OF WORK

Safe Systems of Work are used as a means of demonstrating that the hazards and risks associated with a particular task have been properly considered and evaluated, with the appropriate risk control strategies having been implemented. A Safe System of Work can only be completed once the potential hazards have been identified and assessed, this therefore requires the completion of a properly considered risk assessment for the activity, which identifies not only the hazards, but also the required controls to manage any residual risks.

The risk assessment procedure is set out within Appendix C of this document.

All Safe Systems of Work documents should be completed using the standard Safe System of Work pro forma (or alternatively at least contain all of the information specified and set out in a logical easy to understand format). When completing the Safe System of Work it should address all of the issues whilst avoiding irrelevant material which is not applicable to the specific situation.

Eurosafe will develop, issue and brief 'Safe Systems of Work for all work activities undertaken.

The Supervisor will provide a 'briefing' to all those involved with the work, operatives will sign to state their attendance and understanding of the activity requirements and risks involved.

Any operatives that have not received the task brief shall not be permitted to undertake work. The Supervisor is responsible for ensuring work activities are carried out in accordance with the Safe System of Work.

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## APPENDIX E

### DRUG & ALCOHOL POLICY

Eurosafes has a ZERO tolerance to drug & alcohol abuse.

#### Risk to Health and Safety

Drug & alcohol abuse by employees and sub-contractors (including supervisory and management staff) can adversely affect the safety and health of themselves or others.

It is the policy of Eurosafes that any person known to be or strongly suspected of being affected by alcohol or drugs whilst on a working site will be challenged by the Contract Manager or Supervisor to explain their condition and why they have reported to work in such an unsafe condition.

NB. All Employees must inform their Line Manager or Supervisor if they are suffering from any illness &/or have been prescribed with any medication by a Doctor.

It must be noted that symptoms suggesting that a person is under the influence of drugs or alcohol may be created by other conditions e.g. heat exhaustion, hypothermia, diabetes, etc. The person may also be affected by legitimate medication prescribed by a doctor.

Any condition whether due to drugs, alcohol or a medical condition will require the person to be removed from their work and the site for safety reasons.

Any person removed from site due to them being judged to be unsafe due to drugs or alcohol will be subject to disciplinary action. The Group CEO will be informed and he will instigate any action deemed necessary.

If there is any doubt as to the persons condition or cause, of their condition medical advice should be sought immediately.

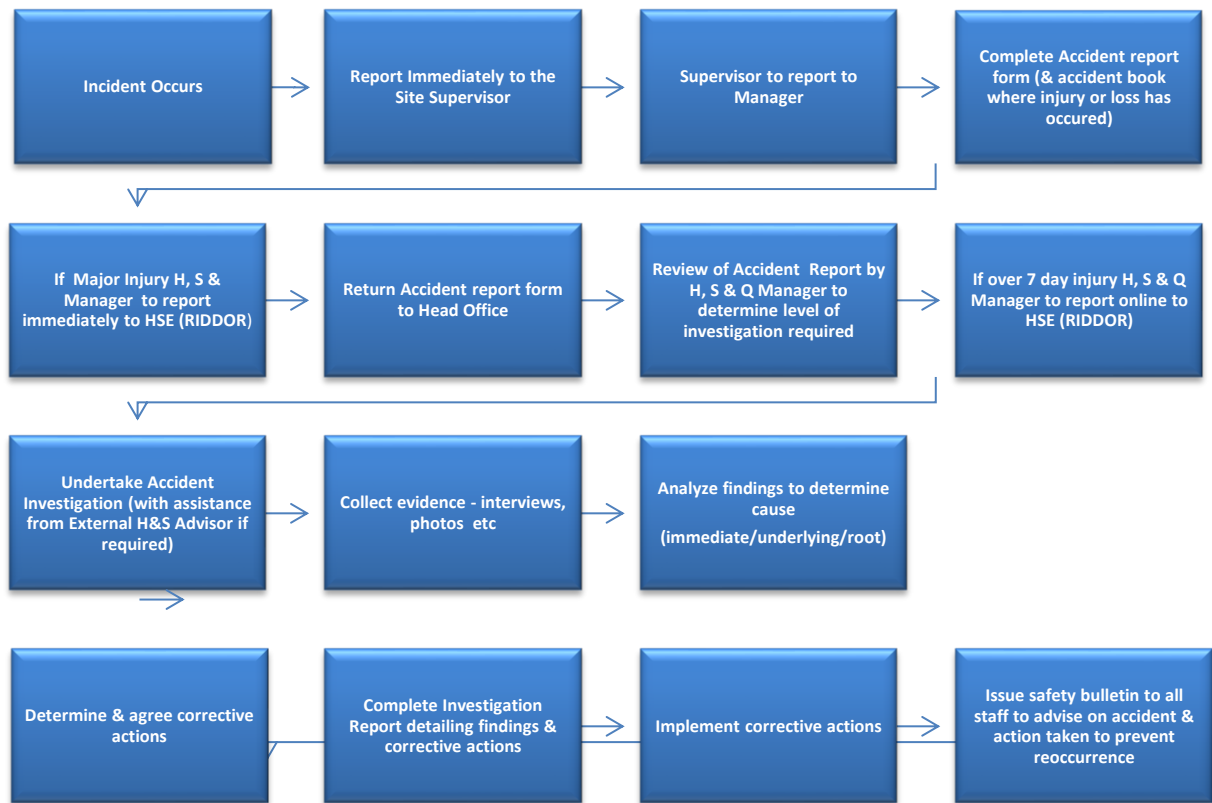
Where Eurosafes are acting as Sub Contractor on a site and the client or Principal Contractor has a drugs testing policy Eurosafes employees will be expected to comply with any request for them to undergo a drugs or alcohol test without argument. In the event that a Eurosafes employee refuses to take a test the Supervisor will immediately inform the Manager who will instigate any action deemed necessary.

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## APPENDIX F

### ACCIDENT INVESTIGATION FLOW CHART



The accident investigation will be undertaken by the Compliance Manager, Manager and/or Supervisor for the location where the accident occurred with assistance from our external H&S advisors as & when required.

NB. Guidance may be required from our External H&S Advisor regarding action to be taken following an accident & RIDDOR reporting required.

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## APPENDIX G

### DRIVING AT WORK POLICY

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#### INTRODUCTION

There is a legal duty under the Health and Safety at Work Act 1974 to ensure as far as reasonably practicable, the health and safety of all employees while at work. Employers and employees also have a duty that others are not put at risk by work related driving activities.

#### DEFINITIONS

Eurosafes defines:

- Driving for work - is travelling from our offices for the purpose of work on behalf of Eurosafes, this does not include travelling from your home to office.
- Vehicle - Includes any type of motorised transport including motorcycles.

#### MONITORING AND REVIEW

The Directors shall ensure that this policy is reviewed annually in the light of:

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- a) Any significant changes in working practices
- b) Any changes in statutory legislation or Eurosafe requirements.
- c) An incident occurs that requires improvements in practice.

## COMPLIANCE

Failure to comply with the requirements of any of Eurosafe health and safety policies and procedures may result in disciplinary action.

## VEHICLES

All vehicles, whether they are company owned, leased or privately owned, must be suitable for the task, be maintained, have the relevant road tax license and be appropriately insured.

## EMPLOYEES WHO DRIVE TO WORK

If an employees vehicle is more than three years old they must ensure that any vehicle used for work has a valid M.O.T. Certificate. They are also encouraged to undertake routine weekly safety checks. It is recommended that they use the private vehicle weekly safety check form (see Appendix)

## INSURANCE

The employees are responsible for ensuring that all vehicles have adequate insurance cover when they are in use. The drivers of private cars must ensure that the car is insured for use at work.

## DRIVERS LICENCES

All drivers must ensure that they have a valid driving license. All employees who drive for work purposes are required to produce this for inspection when taking up the post & provide a further copy on an annual basis or when requested, It is the responsibility of individual drivers to inform the Directors immediately if for any reason they have their license removed.

## USE OF MOBILE PHONES IN VEHICLES

It is illegal to use a mobile phone in the vehicle at any time when the engine is running. This includes when stationary at traffic lights or when parked on or adjacent to roads when engine is running. No Eurosafe employee should use a mobile phone whilst in the driving seat of a vehicle and the engine is running. There are two exceptions to this rule:-

- i) If your life is in danger and you need to contact emergency services on 999 and to stop would exacerbate the situation.
- ii) If the mobile phone system can be activated totally hands free. To be totally hands free there must be no need to take either of your hands off the steering wheel. Such systems can be activated by voice or automatically cut in.

Although these can be used when driving it is important to consider if the road conditions are such that it is safe to do so. If the weather conditions are poor or the traffic is heavy then cut the conversation short and find a safe place to stop then phone the caller back.

The use of any phone/electrical device for reading and responding to emails is strictly prohibited whilst the vehicle engine is

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switched on.



## DRIVERS HEALTH

The safety of any driver is affected by eyesight defects and all drivers have a legal duty to satisfy the eyesight requirements in the Highway Code. Eurosafe employees should have regular eyesight tests as they are not provided by Eurosafe. These eyesight tests are to be carried out by a competent person, at suitable intervals thereafter.

No member of staff should drive at work under circumstances which may affect their ability to drive safely. It is the duty of any employee who is required to drive on Eurosafe business to inform the directors if they are suffering from any illness or health condition which impairs their ability to drive or if they are required to take medicine that might affect their judgement. No employee should drive at work when they are under the influence of alcohol or drugs.

## WORKING DAY DURATION WHEN TRAVELLING LONG DISTANCES

Working long hours which include driving long distances can increase the possibility of accidents. This is especially so in poor driving conditions such as those caused by adverse weather conditions.

When attending meetings or training sessions which involves driving, overnight accommodation may be made available through discussion with the directors if the total of travel time and working day is deemed excessive.

When driving long distances all drivers should take a rest of 15 minutes after driving continuously for two hours.

## APPENDIX 1: PRIVATE VEHICLE SAFETY CHECK FORM VEHICLE CHECKS

Item	Checked		Comments
	Yes	No	
Tyres pressure and tread			
Lights (front, rear, brake, full beam and reversing indicators)			
Windscreen/windows			
Washers and wipers			
Mirrors including the internal mirror			
Oil/coolant, battery levels			
Seating position			
Hand break			
Gear operation			
Warning lights			
First aid kit/torch and reflective waistcoat			

## APPENDIX 2 - DRIVING CODE OF GUIDANCE

This code of guidance is intended for all vehicle users and contains the following sections:

- a) General Driving
- b) Travelling Alone
- c) Motorway Breakdown
- d) Winter Driving
- e) Driving and Stress

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## PART A - GENERAL DRIVING

Before setting out on any journey carry out a maintenance check of your vehicle.

1. Clean your windscreen inside and out
2. Ensure wing mirrors are clean
3. Look for signs of wear on windscreen wiper blades and replace as necessary.
4. Check that lights and indicators are working
5. Check your tyres for sharp objects and worn tread
6. Check your tyre pressure
7. Carry out oil check
8. Ensure sufficient water is in the radiator and windscreen washer bottle
9. Maintain at least half a tank of petrol

Plan ahead for your journey. If travelling long distances consider having the following in your vehicle.

1. Driving licence, MOT certificate, insurance document
2. Supply of small change, mobile phone
3. Torch
4. First aid kit
5. Fire extinguisher
6. Light snack in case you are held up in traffic or stranded due to bad weather.
7. If travelling in poor weather/snow take Wellington boots, additional clothing, spade, flask of warm drink.

## PART B - TRAVELLING ALONE

1. Always try to travel on main or well used roads
2. If travelling after dark make sure someone knows your destination, estimated time of arrival and your planned route
3. Keep doors locked in towns. Unlock on open roads as in the event of an accident it is easier for a rescuer to get into the vehicle.

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4. Park in well lit areas. If in a multi-storey car park, try and find a space near the exit.
5. Never put possessions on the passenger seat when travelling in town. They may be snatched at traffic lights.
6. Always lock your vehicle. When returning, enter the vehicle swiftly.
7. If vehicle starts to “play up” stop in a well-lit area, near a phone box or a well used area.
8. NEVER give lifts to strangers
9. Ensure that you have charged your mobile phone before setting off on your journey.

What to do if:

- a) You see someone in difficulty, an accident, someone tries to flag you down or another incident. Think first. Is it genuine, can you help? It might be safer to continue and report what you have seen at the next telephone or nearest police station.
- b) You are being followed, try these counter measures:
  - i. Keep calm, pull into the left lane and slow down
  - ii. Ignore the follower, chances are they’ll get bored and drive past
  - iii. Don’t make eye contact
  - iv. If they persist don’t go home, make sure your windows are closed and doors locked, drive to a busy, well-lit public place, a police station, garage forecourt or similar place.
- c) You are forced to stop
  - i. Try to keep your engine running, don’t try to ram the other vehicle as you will probably stall and be unable to get away.
  - ii. If the driver leaves the vehicle and approaches you, check there is enough space behind to reverse into and accelerate away, sounding your horn and activating your hazard lights.
  - iii. If there is no room to manoeuvre make sure all windows and doors are locked and look around for something to protect yourself with. It is illegal to carry weapons in this country, but there are many everyday items that can be used to defend yourself, e.g. bunch of keys. Continue to sound horn and lights.

## PART C - MOTORWAY BREAKDOWN

The police run regular patrols on the motorway, but there is always the chance that they may be called away to attend an accident. If you just stay with the vehicle and wait for assistance to arrive, you may find there is a long delay. Also you cannot be sure that the police know of your difficulties unless you have asked for help on one of the emergency telephones.

As soon as you are aware that you are in trouble you should

- i. Pull over to the hard shoulder as far to left as possible
- ii. You need not stop straight away, often you will be able to coast for quite a distance.
- iii. Aim to reach one of the emergency telephones

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These telephones are available for use in an emergency by anyone - you do not have to be a member of the AA/RAC etc. to summon help. If you cannot stop right next to the telephone, look for one of the marker posts which will show you the direction to the nearest one. The telephones are only a mile apart, so you never have to walk more than half a mile.

Never reverse on the hard shoulder or cross the carriageways.

Telephones are always opposite each other. If they are out of order, whenever possible, extra police cars will be sent to patrol the motorway. Even if you have a mobile phone you should still use the emergency telephones to inform the motorway police, as these telephones pin-point your position exactly.

- a) Switch on your hazard lights
- b) Leave the passenger door wide open (unless you are leaving the vehicle a distance from a telephone)
- c) Lock all other doors and wind up windows

Whilst using one of the emergency phones, stand behind it facing the oncoming traffic, this will enable you to see if anyone is approaching.

You will not need any money to make the call and will be put directly in touch with motorway control. Inside the box you will find a list of all the information you will need to give Motorway Control. If you are a woman travelling alone tell them and your call will be given priority.

## PART D - WINTER DRIVING

Driving in poor winter conditions need not be daunting as long as you and the vehicle are properly prepared.

Take the following points into consideration

Speed:

- i) Don't drive as quickly as you normally do
- ii) Don't be hurried into faster driving by others
- iii) Conditions mean that more time and distance is needed to pull up safely or steer around a potential accident.
- iv) Look out for possible trouble, e.g. black-ice which is usually indicated by a 'lightness' feeling in the steering

Gears:

- i) When driving on snow stay in the highest gear possible, for the best traction
- ii) Keep the vehicle moving on hills, maintaining momentum is all important
- iii) Try to keep your speed constant but avoid wheel spin do not accelerate too much
- iv) When going down hills, select a lower gear and keep speed down

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- v) If possible do not use the accelerator or brakes
- vi) If you need to brake, do so before your speed picks up

Skidding:

Skidding is caused by; excessive speed, misjudgement in steering, over acceleration, sudden braking.

These are three types of skid, each requiring different methods of control

- i) Front wheel skid - Usually caused by excessive speed at a corner. The vehicle continues in a straight line instead of following the direction of the front wheels. This can be corrected by removing pressure from the accelerator and at the same time straightening the front wheels.
- ii) Rear wheel skid caused by excessive speed, misjudgement in steering or over-acceleration. Correct by removing pressure on the accelerator and at the same time turn the front wheels into the skid i.e. if the back of the vehicle swings to the right, steer the vehicle to the right (or vice versa), but do not prolong the action longer than is required to correct the skid or you may develop another skid in the opposite direction.
- iii) Four wheel skidding is caused by sudden braking. To get you out of trouble lightly pump the brake pedal, off and on, as quickly as you can. This will keep the wheels moving so you can steer out of trouble. If your vehicle has anti lock brakes, it will carry out this action for you.

## PART E - DRIVING AND FATIGUE

Driving whether you're sitting in city centre hold-ups or travelling at speed down the motorway cause fatigue and physical discomfort. When driving you move very little and your range of movements are restricted by the position of the hand and foot controls. This sustained sitting position together with poor posture is responsible for the many painful back, neck and shoulder problems experienced by drivers.

There are three things you can do to minimise the fatigue of driving:-

- a) Adopt the best position

Before setting off take the time to position yourself correctly in the vehicle

- i. Make sure the vehicle seat provides support for the small of your back. It may pay to invest in a lumbar roll.
- ii. Adjust the for and after movement of the seat so that you can reach pedals and steering wheel without stretching. The knees should be slightly bent and the thighs supported by the seat cushion.
- iii. Ensure the seat belt goes comfortably across your body.
- iv. Keep your hands a comfortable distance apart on the steering wheel and your arms slightly bent.
- v. Adjust the interior and exterior mirrors every time you enter the vehicle to provide the best possible backward views (gravity compresses the spine by up to ¾" during the day).

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#### b) Reducing Tension

Reducing the tensions of driving can be achieved by following simple exercises when stopped at traffic lights or in a traffic jam.

- i. Tuck in your chin and stretch your neck to make in longer, then relax. Repeat two or three times
- ii. Turn the head slowly to one side as far as possible. Then turn to the other side, repeat two or three times.
- iii. Haunch your shoulders towards your ears and relax. Repeat as above.
- iv. Tighten your stomach muscles as frequent intervals. This helps support the internal organs and promotes good posture.
- v. Ensure you have a supply of fresh air into the vehicle.

#### c) Take a Break

Take a break for 15 minutes after every two hours driving. The important thing is to recognise when you need to stop and get out stretching your legs, let fresh air into your lungs. Take a short walk to help your circulation and generally wake yourself up.

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## APPENDIX H

### CDM PROCEDURE

The Construction (Design & Management) Regulations 2015 aim is to improve the management of health & safety in construction from concept design to the end of life of a structure.

Eurosafe will fully comply with its duties under the Construction (Design and Management) Regulations 2015 (known as CDM) & through our works we perform duties as both Principle Contractor, Contractor & Designer.

### SUMMARY OF DUTIES - CONSTRUCTION (DESIGN & MANAGEMENT) REGULATIONS 2015

CDM Duty Holders	Main Duties
<b>Commercial Clients</b> Organisations or individuals for whom a construction project	Make suitable arrangements for managing a project, including making sure: <ul style="list-style-type: none"> <li>• Other duty holders are appointed as appropriate</li> <li>• Sufficient time and resources are allocated</li> <li>• Relevant information is prepared and provided to other duty holders</li> <li>• The principal designer and principal contractor carry out their duties</li> <li>• Welfare facilities are provided</li> </ul>
Designers - organisations or individuals who as part of a business, prepare or modify designs for a building, product or system relating to construction work	When preparing or modifying designs, eliminate, reduce or control foreseeable risks that may arise during: <ul style="list-style-type: none"> <li>• Construction</li> <li>• The maintenance and use of a building once its built</li> </ul> Provide information to other member of the project team to help them fulfil their duties.
Principle Designers - Designers appointed by the client in projects involving more than one contractor. They can be an organisation or an individual with sufficient knowledge, experience and ability to carry out the role.	Plan, manage, monitor and coordinate health and safety in the pre-construction phase of a project. This includes: <ul style="list-style-type: none"> <li>• Identifying, eliminating, or controlling foreseeable risks.</li> <li>• Ensuring designers carry out their duties.</li> <li>• Prepare and provide relevant information to other duty holders.</li> </ul> Liaise with the principal contractor to help in the planning, management, monitoring and coordination of the construction phase.
Principle Contractors - contractors appointed by the client to coordinate the construction phase of a project where it involves more than one contractor.	Plan, manage, monitor and coordinate health and safety in the construction phase of a project. This includes; <ul style="list-style-type: none"> <li>• Liaising with the client and principal designer</li> <li>• Preparing the construction phase plan</li> <li>• Organising cooperation between contractors and coordinating their work</li> </ul>

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	<p>Ensuring:</p> <ul style="list-style-type: none"> <li>• Suitable site inductions are provided</li> <li>• Reasonable steps are taken to prevent unauthorised access.</li> <li>• Workers are consulted and engaged in securing their health &amp; safety</li> <li>• Welfare facilities are provided.</li> </ul>
<p>Contractors - Those who carry out the actual construction work, contractors can be an individual or a company</p>	<p>Plan, manage and monitor construction work under their control so it is carried out without risks to health &amp; safety.</p> <p>For projects involving more than one contractor, coordinate their activities with others in the project team. In particular, comply with directions given to them by the principle designer or principal contractor.</p> <p>For single contractor projects, prepare a construction phase plan.</p>

## DUTIES OF DESIGNERS:

Where we undertake design work we will ensure:

- Employees preparing designs on Eurosafe behalf will bring to the attention of clients their duties under the Construction (Design & Management) Regulations 2015 & our employees undertaking designs are required to follow the designer’s duties as defined within the HSE Guidance on the Regulations (L153) this will also include liaison with the appointed Principal Designer.
  - The guiding principles for designs prepared by Eurosafe are to design to avoid Health & Safety risks, so far as is reasonably practicable. Where avoidance is not possible the risks should be reduced at source as far as practical and all information relevant to Health & Safety should be included with the design. To assist with this process we use a Design Risk Assessment which has been developed in line with the Working at Height Hierarchy of Control, this document can be issued with the Design when required to identify any significant residual risk issues.
  - It will be Eurosafe practice to co-operate fully with the Principal Designer, where appointed, and with other designers involved in projects to make the maximum contribution to design safety.
- 1) A Designer must not commence work in relation to a project unless satisfied that the client is aware of the duties owed by the client under these regulations
  - 2) When preparing or modifying design, the designer must take into account the general principles of prevention and pre-construction information to eliminate, so far as reasonably practicable, foreseeable risks to the health and safety of any person -
    - a. Carrying out or liable to be affected by construction work

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- b. Maintaining or cleaning a structure; or
  - c. Using a structure designed as a workplace
- 3) If it is not possible to eliminate these risks, the designer must, so far as reasonably practicable -
  - a. Take steps to reduce or, if that is not possible, control the risks through the subsequent design process;
  - b. Provide information about those risks to the principal designer; and
  - c. Ensure appropriate information is included in the health and safety file
- 4) A designer must take all reasonable steps to provide, with the design, sufficient information about the design, to adequately assist the client, other designers and contractors to comply with their duties of the regulation.

#### DUTIES OF PRINCIPLE CONTRACTORS:

Where we undertake work as a Principle Contractor we will ensure to:

- plan, manage, monitor and coordinate the entire construction phase
- take account of the health and safety risks to everyone affected by the work (including members of the public), in planning and managing the measures needed to control them
- liaise with the client and principal designer for the duration of the project to ensure that all risks are effectively managed
- prepare a written construction phase plan before the construction phase begins, implement, and then regularly review and revise it to make sure it remains fit for purpose
- have ongoing arrangements in place for managing health and safety throughout the construction phase
- consult and engage with workers about their health, safety and welfare
- ensure suitable welfare facilities are provided from the start and maintained throughout the construction phase
- check that anyone we appoint has the skills, knowledge, experience and, where relevant, the organisational capability to carry out their work safely and without risk to health
- ensure all workers have site-specific inductions, and any further information and training they need
- take steps to prevent unauthorised access to the site
- liaise with the principal designer to share any information relevant to the planning, management, monitoring and coordination of the pre-construction phase

#### DUTIES OF CONTRACTORS:

Where we undertake work as a Contractor we will ensure to:

- make sure the client is aware of the client duties under CDM 2015 before any work starts

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- plan, manage and monitor all work carried out by themselves and their workers, taking into account 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 we 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 our 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 our control
- ensure we 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 our control, and maintain them throughout the work

In addition to the above responsibilities, when working as contractors on projects involving more than one contractor we will:

- coordinate our work with the work of others in the project team
- comply with directions given by the principal designer or principal contractor
- comply with parts of the construction phase plan relevant to our work

Where we are the sole contractor working on a project, we will ensure a construction phase plan is drawn up before setting up the site.

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## APPENDIX I

### ASBESTOS POLICY

#### BACKGROUND

Asbestos containing materials (ACM's) were used in the construction industry for many years primarily to deter the spread of fire or for their insulation properties. Therefore, ACMs may be present in a wide variety of products including: ceiling/wall boards, suspended ceiling tiles, floor tiles, soffit boards, roof panels, fire insulation, pipe lagging, boiler lagging, bitumen adhesives, door panels etc. Although the use of such materials is now prohibited by legislation, they may still exist in many older premises.

There are three main types of asbestos that are widely used in the Construction Industry in over 3000 products, however there are an additional three types of asbestos which are not so common but still may be encountered in Construction Work.

Three Main Asbestos types:

- Chrysotile (White)
- Amosite (Brown)
- Crocidolite (Blue)

Asbestos Containing materials are not easy to identify as its appearance may be altered due to over coating, ageing, becoming dirty, the effects of heat, encapsulation and or cross contamination sources such as oils, chemicals etc. The health effects arising from asbestos exposure and inhalation are severe and may include but are not limited to:

- Mesothelioma
- Lung cancer
- Asbestosis

#### TRAINING

Under the Control of Asbestos Regulations 2012, all persons involved with building; construction; installation of services and pipework etc; maintenance; refurbishment; repair of existing structure where asbestos may be present, must be provided with compulsory

#### ASBESTOS AWARENESS TRAINING.

Details of Asbestos Awareness training undertaken is detailed in the Training Matrix but should consist of initial training on asbestos awareness followed by annual refresher training. This training should be consistent with the UK Asbestos Training Board (UKATA) training syllabus and the course should be delivered by an approved UKATA training provider.

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## PROCEDURE

It is Eurosafe aim therefore to prevent exposure to asbestos or ACM's so far as is reasonably practicable & protect the health, safety & welfare of our employees. Before works commence records regarding asbestos present shall be consulted (Asbestos Register, Asbestos Surveys) to ensure that the location and condition of ACMs are understood and to enable the works to be are suitably planned to avoid exposure or disturbance.

However during works should any employee suspect that a material they are working on or are about to work on may contain asbestos, they should stop work immediately & follow the procedure detailed in Appendix G, including securing the area to prevent others from entering. The operative should then inform their Supervisor or Compliance Manager immediately, so that further investigations may be carried out.

The actions to be taken on discovery of Asbestos or ACM's will be communicated to employees during Induction & a copy of the Asbestos Essentials guidance EM1 provided. A flow chart detailing the action to be taken is also included in Appendix G.

## APPENDIX J

### FIRST AID POLICY

#### GENERAL STATEMENT

It is our policy to ensure the appropriate first aid arrangements are in place for our staff and any visitors to our premises. This includes providing sufficiently trained employees for our business needs and maintaining an adequate supply of first aid equipment. It also involves providing enough information to staff to enable first aid assistance to be sought during normal working hours. Where work is regularly undertaken outside these hours, then adequate first aid cover will be provided.

#### THE LEGAL POSITION

Our duty to provide first aid at work is governed by the Health and Safety (First Aid) Regulations 1981. These require us to carry out a risk assessment in order to determine what first aid facilities and personnel are necessary to meet the needs of our business. We are also required to review this assessment at least periodically to ensure that current provision is adequate. In order to comply with these regulations, our assessment has considered several factors, including the following:

- Size of business
- Type of business
- Needs of lone workers away from office
- First aid cover in times of sickness or annual leave

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## RESPONSIBILITIES OF FIRST AID PERSONNEL

In order to carry out their duties effectively, first aid personnel have the following duties and responsibilities.

First Aiders are responsible for:

- Responding promptly to all requests for assistance
- Summoning further help if necessary
- Looking after the casualty until recovery has taken place or further medical assistance has arrived.
- Reporting details of any treatment provided.

Appointed Person(s) are responsible for looking after the first aid equipment and ensuring that boxes are re-stocked when necessary.

## PROCEDURES

The following are general first aid related procedures to be followed by all staff. If you are aware that an employee has been taken ill, or has had an accident, inform the Compliance Manager for assistance, if the Compliance Manager is not available please see first aiders list, located on kitchen notice board. You should not attempt to give first aid treatment yourself.

If you need to access a first aid kit for personal use, do not remove it from its designated place. Any loss or damage to first aid equipment must be reported to the appointed person, if this person is not available please see first aiders list, located on kitchen notice board.

## APPENDIX K

### VIBRATION EXPOSURE POLICY

Vibration is covered by the Vibration at Work Regulations 2005. Therefore, Eurosafe will ensure that all tasks and work activities will be arranged to take the requirements of these regulations into account. Hand Arm Vibration (HAV) is vibration transmitted into the hands and arms with regular use of using hand-held, powered work equipment. Excessive exposure to HAV can cause hand arm vibration syndrome (HAVS) & Carpal Tunnel Syndrome therefore exposure to vibration should be monitored. Eurosafe will utilise the HSE Hand Arm Vibration Calculator when assessing the likely vibration impacts from our tools and equipment. The exposure action value (EAV) for hand arm vibration is a daily exposure of 2.5 m/s<sup>2</sup> The exposure limit value (ELV) for hand arm vibration is a daily exposure of 5 m/s<sup>2</sup> Where ESL identify that there is a risk to the health of our employees arising from vibration related activities, ESL will initiate a programme of HAVS monitoring with an initial health assessment which will be followed by annual health assessments where applicable. Initial & Annual HAV screening will be undertaken & information will be provided to employees regarding the risks of exposure to vibration & action taken to reduce exposure to HAV e.g. low vibration tools, regular maintenance etc. Where a potential problem is identified the risk will be assessed & the necessary action taken to reduce exposure. Where the HAV Screening indicates a potential issue external health surveillance for employees affected will be undertaken.

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## APPENDIX L

### WORKING AT HEIGHT POLICY

Eurosafes will comply with its duties under the Work at Height Regulations 2005 (WAHR) while undertaking its core work activities. The nature of the work that Eurosafes undertake involves the installation of height access solutions and the subsequent routine testing inspection and repair of such equipment. This type of work naturally involves the setting to work of operatives who will be regularly engaged in various working at height activities and this demands that Eurosafes's safe system of work procedures are robust and suitable. All work at height tasks will be planned managed and monitored and assessed by competent and experienced persons, however alternatives to working at height will always be considered in accordance with the (WAHR) 2005.

The hierarchy of control measures outlined in the (WAHR) 2005 are:

- ☒ Avoid work at height
- ☒ Prevent any person from falling from a place of height
- ☒ Use an existing place of work which complies with the Regulations
- ☒ Use work Equipment to effectively mitigate the potential of falls from height
- ☒ Mitigate falls by using work equipment to minimize the distance and consequences of a fall
- ☒ When selecting fall prevention measures strive to install collective prevention measures above individual prevention measures
- ☒ Where work equipment does none of the above, provide additional training and instruction or other suitable measures

The above hierarchy will be considered during the preparation of risk assessments and method statements to ensure that safe systems of work which comply with the WAHR are established and implemented. Other factors such as the location and duration of the work; the weather conditions; the task to be carried out and the experience and competence of the individual should also be taken into consideration when planning and managing work at height tasks.

As the majority of Eurosafes works involves working at height in addition to the above suitable training shall be provided to all Supervisors & Operatives on safe working at height practices, the equipment & PPE required e.g. harness & lanyard and training on the rescue procedures to be followed in an emergency situation.

### LADDERS (INCLUDING STEPLADDERS)

This policy and its arrangements allow the use of ladders under certain conditions. A ladder should be considered as a temporary measure and may be used if the task is of short duration (maximum 30 minutes) and the ladder user is always able to maintain three points of contact with the ladder. However, for works of longer duration other suitable working at height equipment should be selected considering the factors detailed in the hierarchy of control measures outlined above.

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We will ensure that only properly marked class 1 industrial equipment is used for working at height. Domestic grade ladders and step ladders will **NOT** be used. Ladders must be of the correct type for the specific task and will be visually inspected before each use, subject to regular checks and maintenance, and meet appropriate legislative and equipment standards. These are summarised below:

- ☐ Keeping wooden ladders free of paint or any other coating which could hide cracks or splits
- ☐ Marking of ladders with a unique number to aid recognition
- ☐ Securing and footing of ladders as soon as possible after erection
- ☐ Use of ladders at the correct angle (75 degree from horizontal)
- ☐ Provision of ladder attachments as necessary

☐ Marking of safe zones around working at height equipment & ladders where persons are working above or below ground, plus use of barriers and warning notices

HSE guidance 'Safe Use of Ladders & Step Ladders' (INDG455) are issued to all employees who use ladders as part of their work.

## MOBILE PLATFORMS, TOWER SCAFFOLDS

Eurosafe will allow the use of mobile platforms and tower scaffolds to provide temporary working at height access providing that the following conditions are in place:

- ☐ The operative erecting the platform will be suitably trained and possess an adequate level of experience and knowledge. The prescribed training for the erection of this equipment will be PASMA (PASMA carded operatives)
- ☐ Eurosafe will provide suitable equipment that has been maintained tested and inspected in accordance with The Lifting Operations and Lifting Equipment Regulations 2005 (LOLER)
- ☐ The access equipment will be erected and used on firm / level none sloping ground conditions
- ☐ Consideration will be given to any overhead services or obstructions
- ☐ The manufacturers instructions will be available and have been read and understood by the user
- ☐ Bracing, platforms, guard rails and toe boards will be correctly fitted
- ☐ Platforms with out-riggers will be properly installed
- ☐ Wheels will be locked when the tower is in use
- ☐ The practice of 'Surfing' i.e. moving the platform with persons on board will be prohibited
- ☐ The platform will be inspected before first use, following alteration or following of adverse weather conditions

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- ☑ The base area of the platform will be demarcated to ensure members of the public and site users are aware of the hazard

## ROOF ACCESS

Eurosafe work activity will often involve operatives and staff accessing roof areas in order to undertake physical tasks related to installation of and the testing / inspecting and repairing of height access equipment. Accessing of roof areas will only be undertaken following a full pre-assessment in accordance with the Working at Height regulations 2005, in particular the recognised hierarchy of control assessment (mitigation of falls):

- ☑ Avoid working at height if possible (Is the access necessary)
- ☑ Use an existing safe place of work (Can the task be undertaken without roof access)
- ☑ Provide work equipment to prevent falls (PPE, MEWPS etc)
- ☑ Mitigate distance and consequences of a fall (Netting, air bags etc)

Eurosafe workforce will seek out pre-existing information relating to the roof condition and features of the area to be accessed via the Building Manager in order to assist with decision making and planning prior to accessing the roof area. This will include the acquiring of roof condition surveys where required.

Where it is determined from a risk assessment or survey that the roof to be accessed has areas where collective edge protection is not present, then a further risk assessment will be produced in order to implement collective and individual fall protection measures that are suitable for the task to be undertaken, examples of which include:

- Installation of temporary or permanent collective edge protection systems
- Use of individual PPE (Harness & lanyard / fall restraint equipment)
- Installation of permanent or temporary 'Man Safe' systems for use during the project duration

## MEWPS

Eurosafe will allow the use of general Mobile Elevated Work Platform equipment (commonly referred to as MEWPs) include portable powered access equipment such as:

- Articulating Boom Lifts (i.e. Cherry Pickers, truck mounted and self-propelled machines)
- Vertical Scissor Lifts
- Push Around Vehicles (PAVS)

The use of this type of equipment will be subject to the following conditions:

- Correct level of information instruction and training will be delivered to applicable operatives and staff and this training will be IPAF 3a & 3b

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- The use of personal restraint systems including harnesses and restraint lanyards will be used by individuals working in Boom type MEWPs
- The MEWPs provided will be maintained tested and inspected in accordance with The Lifting Operations and Lifting Equipment Regulations 2005 (LOLER)
- MEWPs to be used on suitable ground conditions only avoiding sloping / uneven ground and ground where the integrity is unknown such as above drainage runs etc.

## TEMPORARY SCAFFOLDS

Fixed to structure type scaffolds may be used by Eurosafe operatives and staff in order to gain access to height. There are no specific training requirements for the use of a completed scaffold providing that:

- The scaffolding has been erected inspected and certified as usable by competent others
- Eurosafe operatives will not alter or dismantle any part of a scaffolding structure
- Eurosafe operatives will report any defects in the scaffold to the responsible person (Principle Contractor / Building Manager)
- Scaffolding will only be used for the purpose it has been erected and this will be detailed during the site induction

## ROPE ACCESS / ABSEILING

In circumstances where the hierarchy of control measures listed in the (WAHR - page 1) dictate that all other methods of height access have been considered and discounted due to unavoidable access or logistical restrictions, the use of rope access & abseiling methods will be utilised under certain conditions:

- A detailed risk assessment and method statement will be produced for each task
- Only suitably trained and experienced operatives will be engaged to undertake the operation
- The associated equipment used for rope access and abseiling operations will be provided to the operatives undertaking the work, this equipment will be tested and inspected at prescribed periods in accordance with the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) and Provision and Use of Work Equipment Regulations 1998 (PUWER).

## LONE WORKING AT HEIGHT

In some situations, Eurosafe Surveyors and Assessors will be required to work at height alone and the hazards associated with this activity must be carefully managed.

Eurosafe have developed a comprehensive risk assessment that outlines the required control measures for working alone at height. The key control measures outlined in the WAH risk assessment are as follows:

- Collect all pre survey information prior to the visit (roof surveys, test and inspection records etc)
- Conduct the survey from a place of safety (utilising equipment such as extendable cameras, drones etc)

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- Access the working at height area by way of pre-installed stairs or fixed access ladders (if these are fit for use)
- Work in areas of collective edge protection where this is available
- In situations where collective edge protection is not available, make use of **fall restraint** personal fall protection equipment (PFPE) in accordance with your training on that equipment
- Attach to a suitable anchor point or installed system from a place of safety, and to suitably fixed anchor points or Man-safe systems that are tested and inspected
- It is important to note that all surveying work is properly planned managed and monitored. Lone working must be avoided where possible. Lone working while undertaking survey work in **fall arrest** is not permitted.

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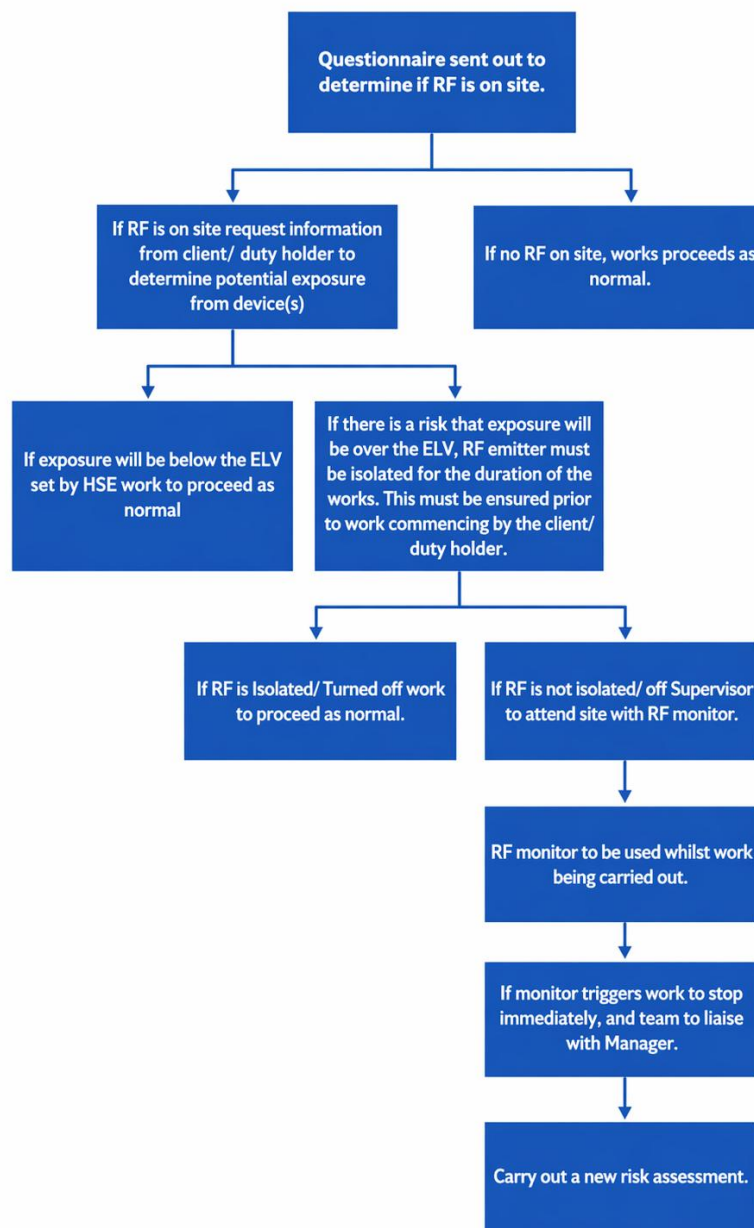
## APPENDIX M

### RADIO FREQUENCY POLICY

#### POLICY STATEMENT

This policy is designed to highlight the safety procedure that should be followed where RF could be encountered, including the process that should be followed from a job being scheduled leading to arrival on site.

#### RF FLOW CHART



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## TRAINING & INFORMATION

All engineers that work in a possibly RF containing environment must have completed RF Awareness training prior to attending site.

## PPE REQUIREMENTS

Where required site engineers will be provided with an RF monitor following the process above. When in use the RF must be switched on and should never be solely relied on.

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## APPENDIX N

### SUBCONTRACTOR POLICY

#### PURPOSE

The purpose of this policy is to identify to all Eurosafes subcontractors the safety rules, procedure, and policies implemented to control accidents and injuries and reduce liability to Eurosafes.

#### SCOPE

This policy applies to all contractors involved on a subcontract agreement to any division of Eurosafes.

#### POLICY

Subcontractors will be expected to recognise and comply with all relevant Health and Safety regulations and standards. Subcontractors will be furnished and required to comply with Eurosafes Health and Safety Policy (kept at Head Office).

#### GENERAL

Eurosafes requires that all subcontractors indemnify us in the event of an injury to a subcontractors employee from lawsuits. However, an injury to a subcontractor's employee could possibly expose Eurosafes adversely to costs associated with incident investigation, interviews, and time away from work to attend court in a civil lawsuit. Therefore, joint coordination between the subcontractors and Eurosafes are key to the reduction of loss associated with process, people and profits.

Before the project site work activities begin the subcontractors bonafide personnel must receive a site-specific safety and health orientation for the project from the Eurosafes supervisor or safety department.

#### SUBCONTRACTOR RESPONSIBILITIES

The subcontractor will ensure that the site-specific health and safety plan is in compliance with all health and safety requirements (i.e hazard communication, personal protective equipment, medical surveillance etc), whilst working with Eurosafes.

The subcontractor is responsible for health, safety and to minimise the potential for loss of process for all employees, equipment, supplied materials, services, suppliers and third tier contractors whilst working for Eurosafes.

#### SAFETY RULES

A list of some important accident prevention practices and procedures that apply to subcontractors, while on a Eurosafes project are as follows:

- The subcontractor must furnish its own first aid supplies provided for in a location available to its personnel. Emergency telephone numbers must be accessible to employees
- Subcontractor incident/accidents are reported to the Eurosafes Manager. A copy of the incident/accident report must be provided to the Manager within 24 hours.

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- The subcontractor is expected to comply with the Personal Protective Equipment at Work Regulations 1992. Eurosafes maintains the right to designate the required personal protective equipment for a project. The following types of PPE may be required: hard hats, hearing protection, eye protection, foot protection, respiratory protection etc.
- Subcontractors should conduct a daily safety audit of its work areas and report any unsatisfactory conditions. Subcontractors will be required to correct any unsatisfactory conditions within their work activities in an agreed timeframe. If this is not done, penalties may apply.
- If unsafe conditions or practices are observed by Eurosafes personnel, the subcontractor will be requested to correct them immediately or, based upon the assessed level of risk agreed to by Eurosafes and the subcontractor, within a defined schedule. If the corrections are not made immediately or within the agreed schedule a formal letter will be issued defining the deficiencies and work activities may cease dependent upon the severity or the conditions.
- Whenever required, subcontractors may be required to either participate in Eurosafes toolbox meetings or conduct their own similar meetings for employees and third tier subcontractors. Documentation must be provided to Eurosafes if separate meetings held.
- Good housekeeping practices are required of all subcontractors. Refuse and scrap should not be allowed to accumulate, especially when it may interfere with work activities or create possible hazards. Combustible materials must be placed in appropriate containers and not allowed to accumulate in the work area.

## SUBCONTRACTOR SECURITY

Subcontractors should take the necessary precautions or security measures to protect its own materials and equipment. Eurosafes is not responsible for any lost or stolen subcontractor materials or equipment. The subcontractor will be responsible for any loss or damage caused by them, their personnel, or their subcontractors to the work or materials, to adjacent property and to persons.

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