

Health and safety policy and procedures

HEALTH AND SAFETY POLICY AND PROCEDURES

I. SCOPE AND INTRODUCTION

The safety and health of all persons, as well as the quality of the environment, should be protected. Wentworth is committed to responsible actions with regard to the effects of its operations on the environment and the people of the local communities.

At Wentworth we recognise our legal and moral obligation to safeguard the health and safety of our employees, stakeholders and community members whilst protecting the environment in which we operate.

We will integrate sound health and safety management practices into all aspects of our business in line with our mission and values.

To achieve our health and safety goals we will:

- Comply with the relevant legal requirements while aiming towards good practice
- Promote robust preventative measures, to assist in the elimination or reduction of work related ill-health, health and safety incidents and maintaining a clean, tidy and pollution free workplace
- Establish and test suitable emergency procedures and equipment
- Manage, monitor and minimise the risks and impacts of our operations and driving continual improvement through clear objectives and targets
- Ensure our employees are competent, supervised, trained, supported, given competent guidance, actively engaged, listened to and effectively communicated with.

We expect:

- All employees to take personal and collective responsibility to help us achieve our vision and contribute to every aspect of health and safety performance.
- That by achieving high levels of health and safety performance, we can earn the confidence and respect of our employees, stakeholders and the communities in which we work
- That by adopting good practice in health and safety performance, we can engage our people, our business partners and the communities in which we work in achieving continual performance improvement.

This Policy will be reviewed periodically to ensure on-going suitability and is authorised by senior management.

II. PURPOSE

The purpose of the Policy is to help prevent health and safety breaches from occurring and to protect the Company and its personnel from breaching the relevant health and safety legislation in the UK and legislation which applies overseas.

III. WHAT IS COVERED IN THIS POLICY AND PROCEDURES

This Policy:

- sets out the principles that all personnel, business partners and contractors must follow and
- provides further guidance on the health and safety regulations including details in the procedures of how to spot issues and practical steps to take with our business partners, and other third parties we work with;

IV. **WHO IS COVERED BY THE POLICY**

All personnel, including any director, officer, or employee of the Company, as well as joint venture and business partners, contractors, and suppliers and service providers to the Company must comply with the Policy.

The Policy does not form part of any employee's contract of employment and may be amended at any time.

V. **ROLES AND RESPONSIBILITIES**

The Board

The Board has overall collective responsibility for health and safety within the Company. The Chief Executive will assist the Board in directing the overall management and development of the Health & Safety Policy (the Policy), defining the aims of the Policy and communicating the responsibilities associated with the management of health and safety within the Company. The Board is responsible for:

- adopting, endorsing, communicating and promoting the Policy statement;
- approving any recommended changes to the Policy;
- promoting the protection of all those who are covered by the Policy;
- providing appropriate resources to allow the Policy to be implemented;
- ensuring an appropriate management structure is in place;
- endorsing and reviewing performance against strategy, objectives and targets;
- endorsing and reviewing performance against the Policy including compliance with relevant legislation;
- receiving and reviewing investigation reports regarding H&S accidents and 'near misses' within the Company;
- monitoring progress against targets and agreed actions to improve H&S performance and culture; and
- conducting an annual management review.

Senior Management Team

The Senior Management Team is responsible for:

- implementing the Policy statement and leading by example;
- promoting the protection of all those who are covered by the Policy;
- providing appropriate resource to maintain the management system;

- implementing procedures to ensure, so far as is reasonably practicable, compliance with legal, organisation and best practice requirements;
- managing, monitoring and delivering agreed safety key performance indicators; and
- seeking to ensure training needs are identified and met.

Health and Safety Communication

The Company will communicate directly with employees. The two way communication will aim to:

- promote health and safety in the workplace;
- monitor health and safety incidents in the Company and seek to identify trends;
- feed back suggested improvements in the Policy;
- bring issues affecting the Company to a wider audience including, where necessary, the Board.

The Competent Person

The Office Manager will act as the Company's Competent Person, in respect of advising the Company on health and safety management and legislation.

Where appropriate, the Office Manager will:

- Provide advice on the Company's arrangements for managing Health and Safety.
- advise on the Company's health and safety training programmes;
- assist in the conduct of the Company's health and safety risk assessments;
- ensure that incidents on the Company's premises or involving the Company's employees are, as appropriate, discussed with the Company's legal advisers , and investigated such that appropriate steps are taken (where necessary) to prevent recurrence;
- keep the Wentworth Senior Management Team up to date with changes in legislation and where necessary highlight where new policies and procedures are required or where the revisions of existing documentation is required;
- carry out an annual audit of the Wentworth Health and Safety Management system;
- liaise with other external consultants where necessary.

Managers

The Office Manager in each office is required to:

- co-ordinate the implementation of the Policy within the premises for which they are responsible;
- ensure that suitable and sufficient risk assessments are carried out including using internal staff or external consultants where necessary;
- organise appropriate health and safety training and publication of safety procedures and notices;

- ensure so far as is reasonably practicable that staff comply with the Company's policies and procedures;
- promote health and safety;
- encourage employees to promote health and safety and release employees to conduct the Company's health and safety business and attend meetings as necessary;
- Ensure appropriate record keeping is undertaken.

Employees

The co-operation of all employees is essential to the success of the Policy. Employees are responsible for:

- taking personal responsibility for their health and safety and that of others who may be affected by their acts or omissions;
- following all lawful, reasonable instruction and procedures;
- co-operating with the company and their colleagues on all safety matters;
- using and maintaining personal protective equipment, if provided, at all times;
- informing management of any work situation that could be reasonably considered hazardous and/or dangerous.

VI. CONSEQUENCES OF NON-COMPLIANCE

Any breach of this Policy and procedures by any Company personnel will be investigated by the Company and may involve disciplinary procedures also being initiated. A serious breach may amount to gross misconduct, and could therefore result in summary dismissal.

Any breach of this Policy and its associated procedures by business partners, contractors and other third parties will be investigated and any breach may result in relevant contracts being terminated.

As criminal offences can also arise for breaches of the UK's health and safety legislation, a breach of this policy may also be a criminal offence where Company personnel, business partners, contractors and other third parties could face separate law enforcement investigations and prosecutions.

VII. GENERAL ARRANGEMENTS FOR HEALTH AND SAFETY

This part of the Policy deals with the arrangements for implementing the Policy by those people described in Part V. The implementation of the Policy is the responsibility of managers at all levels. The latest version is available for inspection by every employee on request to their manager.

All employees of the Company have had the Policy drawn to their attention and they should familiarise themselves and comply with (and where appropriate ensure that their subordinates (if any) comply with) all relevant health and safety legislation, Company Policy and procedures and instructions. If, where appropriate, they wish to delegate any part of their duties to a colleague with special responsibilities for safety, they may do so, always remembering that responsibility still lies with them.

Any employee of the Company can request that work stop in the event of unsafe behaviour. The Company's Senior Management Team and Managers have the authority to order work

to stop if they consider that continuation would endanger health and/or safety or to escalate following Company line management procedures

The Senior Management Team and Managers will be available to give advice and guidance on safety matters on request. They will also circulate information on new safety legislation and other information as it becomes available.

The arrangements for health and safety in this section are those arrangements that affect the whole of the Company. The Company's safety procedures for our asset amplify these and detail arrangements specific to the asset. On occasion however, local arrangements may take precedence over these arrangements.

VIII. **MANAGEMENT OF HEALTH AND SAFETY**

VIII.1 **Health and Safety Policy**

- Review of the Policy:
 - (a) the Policy will be reviewed annually or when specific changes are required; and
 - (b) the Policy will be amended where required and all employees informed of any amendment.
- Display of the Policy:
 - (a) a copy of the Policy will be available to all employees; and
 - (b) each office will hold a copy of the signed policy statement, together with a list of general health and safety responsibilities which will be displayed on the breakout room notice boards.

VIII.2 **Health and Safety Risk Assessments**

- It is the Company's Policy to carry out risk assessments wherever there is a foreseeable risk to the health, safety, or welfare of employees, or others who may be affected by our routine and non-routine business activities. Risk assessments will be carried out by a Manager. In particular, we will carry out risk assessments to cover the following topics but we are not limited to just these:
 - (a) control of substances hazardous to health;
 - (b) use of display screen equipment ("DSE");
 - (c) fire;
 - (d) expectant women and nursing mothers;
 - (e) water hygiene;
 - (f) asbestos (where asbestos is known or suspected);
 - (g) confined spaces
 - (h) noise and vibration at work;
 - (i) employment of young people;
 - (j) manual handling operations;

- (k) use of work equipment; and
- (l) personal protective equipment ("PPE").
- Copies of the results of risk assessments and the control measures the Company proposes to implement to eliminate the hazard or reduce the risk, will be made available to all staff and provided to contractors as part of our procurement process and included in pre-contract health and safety plans where appropriate.
- Hazards will be eliminated or the risk reduced to the minimum reasonably practicable level by implementing control measures and safe systems of work. This will involve the following steps:
 - (a) identify hazards;
 - (b) assess the risk to the health, safety and welfare of employees (and others) as a result of those hazards;
 - (c) eliminate the risk or identify measures to control the risks;
 - (d) implement the control measures; and
 - (e) monitor control measures.
- Risk assessments will be reviewed:
 - (a) regularly (at least annually);
 - (b) when any significant change takes place in the workplace;
 - (c) when an employee raises a concern; and
 - (d) following an accident, dangerous occurrence, or near-miss.
- Where any employee identifies a hazard that may pose a significant risk to the health, safety or welfare of employees, they should report it to their Manager. Once reported, a risk assessment will be carried out and documented. If necessary control measures will be implemented and monitored.

VIII.3 **Safe Systems of Work**

- Where a risk assessment identifies a hazard that cannot, so far as is reasonably practicable, be eliminated, Managers have a duty to consider in detail the hazards of each 'work process' and devise safe systems of work which will, as far as is reasonably practicable overcome the hazards. Safe systems of work are to be drafted in accordance with the requirements of the Policy and agreed with the Senior Management Team.
- Since work processes change, safe systems of work will be monitored in accordance with the Company's policy.
- Where tasks require access to hazardous areas or involve hazardous activities, a Permit to Work or Hot Works Permit system may be instigated.
- If required, suitable PPE will be issued by the Manager, free of charge to employees.
- Where a hazard cannot be eliminated suitable alternative controls will be found and a suitable hazard warning sign may be displayed.

VIII.4 **Employee Communication and Safety Information**

- Great importance is placed by the Board on solving health and safety problems as close to the workplace as possible. Day-to-day problems should be dealt with by the Manager and the staff concerned, assisted where required by the Senior Management Team.
- All relevant safety information will be provided at the Company's offices. This is to include:
 - (a) the Policy;
 - (b) any relevant legal information;
 - (c) employer's liability insurance certificate (current);
 - (d) fire safety instructions;
 - (e) other safety instructions relevant to that workplace; and
 - (f) a list of key health and safety personnel.
- Communication of health and safety information will as with all other matters be dealt with through the normal management chain. In addition, the Board will also communicate health and safety issues directly to employees. Similarly, issues raised by employees may be communicated to the Board through normal reporting lines.
- In consulting with employees, the Company will ensure that any Representatives are provided with sufficient time off, on full pay, to undertake suitable training in their role and to carry out their function as representatives and be provided with sufficient information to identify:
 - (a) what the likely risks and hazards arising from their work may be;
 - (b) the measures in place, or which will be introduced, to eliminate or control those risks; and
 - (c) what employees should do when encountering risks and hazards.
- The Company believes that contractors and suppliers play an integral part in achieving high levels of health and safety performance. Effective communication with all contractors and suppliers is therefore an essential part of the Policy. The Company will ensure through its procurement and management procedures that contractors and suppliers receive all relevant health and safety information, to enable them to plan and implement safe systems of work while working on the Company's premises.

VIII.5 **Monitoring**

It is the policy of the Company to carry out regular monitoring of health and safety in all areas of the Company's undertaking. This monitoring includes:

- annual Safety Review by the Senior Management Team and approved by the Board.
- review of risk assessments and accident statistics as appropriate by the Senior Management Team;

- system and equipment testing and inspections by Consultants, Suppliers and where appropriate an annual audit carried out by the Manager; and
- review of any relevant information by the Senior Management Team.

VIII.6 **Safety Instruction and Training**

- The Company's policy is to ensure that all employees (including temporary workers) are adequately trained to carry out their role in a safe and healthy manner.
- The Company has carried out an assessment of basic health and safety training requirements for employees at all levels in the Company and it is carrying out a programme to fulfil this training need.
- All new employees will be given safety induction training to include:
 - (a) fire precautions and safety procedures;
 - (b) first aid and accident reporting arrangements;
 - (c) general information on health and safety;
 - (d) known hazards in the workplace and control measures in place;
 - (e) the Company's policy and procedures;
 - (f) specific topics relating to that person's role and their place of work.

VIII.7 **Purchasing**

It is the Company's policy, so far as is reasonably practicable, to reduce the risks to its employees and contractors from equipment, materials and substances. We intend to achieve this by implementing procurement procedures to ensure:

- health and safety is considered and assessed when purchasing/hiring equipment, products and substances; and
- adequate checks are carried out on contractors, to ensure their competence and their ability to allocate adequate resources to the contract, prior to them commencing work on site.

VIII.8 **Records**

- It is the policy of the Company to ensure that all health, safety and welfare systems are adequately recorded and that statutory records and registers are maintained. A list of such records, together with a list of persons responsible for maintaining them is kept at each office location.
- All records and registers (with the exception of personnel files and details of individual's health monitoring) are available at all reasonable times to employees, by prior arrangement with the Senior Management Team.

VIII.9 **Contractor Management**

- The Company has in place procedures and contract conditions for managing the selection, competency and control of contractors.
- The Company believes that effective communication with all contractors and suppliers is an essential part of good health and safety and will ensure that

contractors and suppliers receive all the relevant Health and Safety information to enable them to plan and implement safe systems of work whilst working on Wentworth's premises.

- In all cases the Company will define any works to be done; identifying any associated hazards and assess the risks. The Company will produce a tender document and will select a contractor based on its predetermined selection criteria.
- Once employed, contractors are to complete their own site specific safety risk assessment on the property / site to be worked on. Where hazardous tasks are foreseen, the contractor is to produce a site specific method statement showing his safe system of work.
- Copies of the contractors' site specific assessment and method statement, where required, will be provided to the Company and copies will be available on site.
- Consideration will be given to the degree of management supervision that the work requires and ensure an appropriate level of communication between all concerned parties.
- Contractors working on site will receive a site induction and must follow the procedures detailed in the site notes.
- It is the Company's policy to ensure so far as is reasonably practicable that anyone who has to work at height will be prevented from falling.

VIII.10 **Permit to work**

The Company does not currently carry out operations that require the implementation of a Permit to Work System. However, permits may be issued under Local Arrangements.

VIII.11 **Fire Safety**

- **General**
 - (a) The Company has in place procedures for:
 - (i) carrying out fire risk assessment;
 - (ii) preventing fires;
 - (iii) evacuation in the event of a fire;
 - (iv) maintaining and checking all fire detection, alarm and fighting systems.
 - (b) The Senior Management Team have overall responsibility for maintaining and ensuring the local implementation of the Company's fire procedures; for making and maintaining a 'fire map' of the Company's premises, showing places of high risk and the precautions put in place by the Company. Copies of these maps are brought to the attention of all employees and others who may be affected by:
 - (i) posting a copy of the fire map on all notice boards;
 - (ii) bringing the fire map to the attention of all employees, contractors and visitors, etc. during all training and site induction sessions;
 - (iii) providing an appropriate number of trained Fire Marshals

- **Fire Risk Assessment**
 - (a) All of the Company's premises will be subject to a fire risk assessment. (This may be conducted by an external consultant).
 - (b) A copy of the fire risk assessment report will be available on site where staff are employed and their attention brought to any hazards found in the assessment.
 - (c) Fire hazards will be eliminated or the risk reduced to the minimum level practicable by implementing control measures and safe systems of work.
 - (d) Regular assessments will be made by the Fire Marshals to ensure that the walkways are kept clear of obstruction and tripping hazards.

- **Fire Detection**

Each of the Company's premises must have adequate means of fire detection. The detection equipment will be maintained and regularly checked by competent persons.

- **Fire Alarm**

- (a) Each of the Company's premises has an adequate means of raising the alarm in the event of fire.
- (b) The fire alarm system in each location is tested by the landlord of the office on a regular basis within the legal requirements of the local jurisdiction.
- (c) The fire alarm system will be serviced by the landlord.
- (d) Records of these tests and servicing will be maintained by the landlord and reviewed by the Office Manager annually.

- **Fire Fighting Equipment**

- (a) The fire risk assessment will determine the minimum level of fire fighting equipment which must be present in the Company's premises.
- (b) Fire extinguishers, fire hoses, wet and dry risers and/or other fire suppressant systems will be serviced by a contractor annually and the service date recorded on each extinguisher/hose reel/system.

- **Emergency Lighting**

- (a) Emergency lighting must be installed in the Company's premises where lighting would continue to be required in the event of a mains power failure.
- (b) Where emergency lighting is generator powered, the lighting will be tested monthly by way of simulated mains failure. A maintenance and servicing programme for the generator will be arranged.
- (c) Battery operated emergency lighting will be tested monthly and serviced six monthly.
- (d) Records of testing and servicing of emergency lights will be maintained on site.

- **Emergency Procedures**

- (a) Written emergency procedures will be provided at each of our offices. These written instructions will include procedures in the event of a fire and where required, procedures in the event of a bomb warning.
- (b) Notices will be displayed on each floor of the Company's premises detailing the action that staff and visitors should take in the event of a fire, and highlight the assembly point to evacuate to in an emergency. This may be different from the Fire execution point depending on location.
- (c) There must be adequate means of escape for all occupants of the Company's premises. These means of escape will be clearly signed with pictograms.
- (d) The means of escape will be regularly inspected by the Fire Marshals to ensure they are kept clear of obstructions and tripping hazards.
- (e) Where disabled persons use the premises, specific arrangements will be made to ensure they can escape in an emergency.
- (f) Where more than 10 members of staff are employed, an appropriate number of Fire Marshals will be nominated and trained to be responsible for specific parts of the Premises.
- (g) A person will be nominated to be the Senior Fire Marshal in each office. Unless stated otherwise their duties will include contacting the emergency services and liaising with them on arrival.
- (h) Emergency evacuation procedures will be practised annually in the Company's premises where staff are employed. –
- (i) Written records of evacuation drills will be maintained.

○ **Fire Training**

- (a) Staff will be informed in relation to:
 - (i) action to take if they discover a fire;
 - (ii) action to take on hearing the alarm; and
 - (iii) action to take in the event of a bomb alert.
- (b) Fire Marshals will be trained in:
 - (i) emergency Evacuation Procedures;
 - (ii) use of Fire extinguishers;
 - (iii) emergency bomb alert procedures; and
 - (iv) how to spot Fire hazards.
- (c) Clients, visitors and contractors:
 - (i) in the event of an evacuation, it is the host's responsibility to ensure that their clients or visitors are escorted off the premises safely.
 - (ii) fire procedures will be explained to all visitors where an individual host cannot take personal responsibility for their safe evacuation.

- (iii) all contractors will receive suitable site induction training to ensure that they are aware of the policy procedures and assembly points.

- **Fire Prevention**

The Company takes all reasonable precautions to prevent a fire from breaking out and recognises that for a fire to take place oxygen, flammable materials and a source of ignition must all be present. The processes of prevention are aimed at preventing one or more of these elements being together. To ensure the processes are being implemented the Office Manager will:

- (a) comply at all times with relevant regulations on the storage, transportation, handling and disposal of flammable materials;
- (b) regularly inspect all the areas where there are potential sources of ignition and ensure that no flammable materials are stored close by;
- (c) maintain awareness through training and refresher training of the preventative steps that need to be taken;
- (d) consult regularly with the Fire marshal team;
- (e) include fire prevention and evacuation procedures during the induction process with all new starters; and
- (f) pay close attention to the activities of contractors through a series of permits to proceed and inspections.

- **Fire Records**

Records are kept of training; inspections; evacuations and maintenance of systems and equipment.

VIII.12 **Workplace Safety**

- **Staff Welfare**

Suitable and sufficient welfare facilities will be available to staff in the Company's premises including:

- (a) toilet facilities including for the disabled;
- (b) washing facilities;
- (c) facilities for rest and to eat meals; and
- (d) drinking water.

- **Workplace Safety**

- (a) Each area of the Company's premises classified as a workplace will:
 - (i) have adequate ventilation;
 - (ii) provide a suitable working temperature;
 - (iii) be adequately illuminated;
 - (iv) be kept in a clean condition;

- (v) have adequate access and workspace for the activity;
 - (vi) have suitable furniture and work stations; and
 - (vii) be regularly inspected and assessed.
- (b) Safe access and egress will be maintained in each workplace, including for the disabled.
 - (c) Provisions will be made to prevent slips, trips, falls and falling objects.
 - (d) All storage racking will be structurally sound and regularly inspected.

VIII.13 **Public Safety**

It is the Company's aim to ensure so far as is reasonably practicable, the health and safety of members of the public who might be affected by our work activities. Where any of our risk assessments identify risks to the public, appropriate control measures will be implemented to control those risks.

VIII.14 **Homeworking**

All employees of the Company who have been designated as homeworkers and subject to a contractual arrangement will be subject to a written risk assessment. This does not apply to those who may occasionally work from home on an informal basis.

VIII.15 **First Aid and Accident Procedures**

- It is the policy of the Company to ensure that adequate first-aid cover is provided for all employees and others who may be affected by our work activities.
- The Manager will report incidents as required by local legislation to the relevant enforcing authority.
- It is the Company's policy to reduce incidents and cases of ill health to the lowest possible level. Where a work-related incident does occur, the Company's incident reporting and investigation procedure is to be implemented. The aim is to learn lessons and communicate key findings to prevent recurrence. The relevant Manager will implement the Company Incident Response Protocol where appropriate.
- The Manager will regularly assess the risks posed to employees and others whilst on the premises and will then determine the required number of first aid facilities and personnel required to control those risks. This is achieved by the provision of a suitable number of qualified First Aiders as appropriate for each location. Within the Company's Premises, names of the trained first aiders will be displayed on Notice Boards.

VIII.16 **Display Screen Equipment (DSE)**

- The Company will ensure, so far as is reasonably practicable, that the health and safety of employees is not adversely affected by the use of Display Screen Equipment ("DSE").
- The Company will ensure that all users' of DSE are provided with information, instruction and training in the safe use of such equipment. Managers will ensure that a programme of assessment of all employees' workstations is in place and that all such assessments are carried out by a competent assessor when a user joins the Company or when there has been a change in their work environment.

- Employees working off site will either ensure that they have their workstations assessed by the host, or undertake an assessment of their own workstation.
- Employees who may be suffering from ill health effects, which may be caused by or made worse by the use of DSE should report these effects to their Managers. Occupational health assessments may be required to be undertaken by employees following such notice to the Company.
- Where eye tests are required by DSE users, these will be provided free of charge. Where an employee provides evidence from an optician showing that they require spectacles for DSE work, then the cost of spectacles suitable for that purpose will be reimbursed by the Company (up to a reasonable figure). Individuals may put this sum towards a pair of spectacles which may also be suitable for other purposes as long as these spectacles are made available for use at work.
- Written records of DSE assessments will be maintained by the Office Manager.

VIII.17 **Manual Handling**

- The Company's policy is to minimise so far as is reasonably practicable, the need for manual handling.
- Where manual handling tasks are necessary, it is the Company's Policy that this will only be carried out by staff who carry out manual handling tasks as part of their normal duties.

VIII.18 **Lone Workers**

- There is no general prohibition on a person working alone.
- Whenever employees or contractors are working alone they should arrange with their manager to have an appropriate level of contact with the office or another colleague. This may entail:
 - periodic supervisory checks;
 - periodic contact by telephone; and/or
 - periodic visits by other employees.
- Young persons and people under training should not be permitted to work alone.
- Where lone working is to be carried out, the person's Manager should ensure in advance, that a safe system of work has been set up to ensure so far as is reasonably practicable, the health, safety and welfare of the employee.

VIII.19 **Remote Workers**

- Remote workers may require additional precautions and safeguards to be put into place. These may be similar to the precautions adopted for the Lone Workers. However, these may also include different precautions, including:
 - (a) provision of transport;
 - (b) accommodation;
 - (c) guides, translators or bodyguard;
 - (d) insurance;

- (e) local currency; and
- (f) telephone and remote access computers.
- Prior to requesting employees to visit remote locations or overseas countries, guidance may be sought from the relevant Government department.
- Employees of the company must follow any business travel protocol.

VIII.20 Personal Protective Equipment (PPE)

- PPE will be issued for use where it has not been possible to eliminate or reduce risk to an acceptable level. Requests for protective clothing and equipment will be made to the Manager, for action.
- Requirements for personal protective clothing and equipment may be identified by:
 - (a) managers, or workers;
 - (b) Senior Management Team;
 - (c) outside agencies.

VIII.21 Safety Signs

Where a hazard cannot be eliminated, the hazard will be indicated by a safety sign conforming to the relevant regulations.

VIII.22 Construction Work

The Company will comply with any local Regulations that relate to construction work.

VIII.23 Electrical Safety

The Company will:

- take action when defects are discovered
- have systems in place for the inspection and repair of electrical installations and equipment (to include fixed wire and portable appliance testing)
- ensure that records of inspections and test certification are retained

VIII.24 Gas Safety

The Company will:

- take action when defects are discovered
- have systems in place for the inspection and repair of gas installations and equipment
- ensure that records of inspections and test certification are retained as landlord.

VIII.25 **Water Quality**

- To ensure that the Company, where applicable, manages water systems it will ensure that suitable and sufficient risk assessments have been undertaken where significant risks have been identified, in particular:
 - (a) water systems incorporating a cooling tower or an evaporative condenser
 - (b) hot and cold water systems
 - (c) other plant and systems containing water where the temperature is likely to exceed 20C and which may release a spray or aerosol during operation or when being maintained.
- Suitable control measures and associated records will be kept for all such assessments and operational / maintenance activities.

VIII.26 **Equipment Safety**

The Company will:

- Undertake risk assessments on the use of all equipment
- Maintain equipment in line with manufacturers' recommendations
- Arrange for testing and inspection by competent persons in line with statutory requirements (by third parties where appropriate)
- Maintain records to demonstrate that statutory testing has been undertaken and written schemes of use and examination are in place where required

VIII.27 **Asbestos**

- It is the Board's Policy that no employee or other person for whom the Company is responsible should, so far as is reasonably practicable, be exposed to asbestos (except in the case of an approved specialist). Where an employee/contractor believes they have discovered asbestos, the Company will seek appropriate specialist advice.
- Where asbestos exists or is suspected in any of the Company's properties, an asbestos risk assessment will be conducted by specialist surveyors to identify asbestos containing materials.
- An asbestos register will be maintained for each property where appropriate.
- Details of the asbestos will be made available to all occupants of the building and visiting contractors (as required).
- Where asbestos exists, and risk assessments indicate a high asbestos hazard, warning signs will be displayed.
- An asbestos management plan will be formulated to either:
 - (a) encapsulate any asbestos present and monitor its condition; or
 - (b) negotiate with the building owner (depending on the lease arrangements for premises and the relevant extent of the Company's obligations); and
 - (c) have the asbestos removed by a specialist contractor.

VIII.28 **Noise and Vibration Hazards**

Where a concern is raised that noise levels within the Company's Premises are too high and a request made to measure the levels, the Office Manager on notification will arrange for this to be assessed and recommend any follow up actions to the Company.

VIII.29 **Waste Management**

- Adequate facilities will be provided at each of the Company's premises for the safe storage of waste materials. Separate facilities for storage of waste food products will be provided, where required.
- Contracts for the regular removal of waste will be established with licensed contractors.
- Separate contracts may be required for the safe removal of any hazardous waste such as, batteries, light tubes, clinical waste, etc.

IX. **ANCILLARY POLICIES**

IX.1 **Smoking**

General

- Smoking is not permitted in the Company's premises.
- Smokers are asked to ensure that if they do smoke then they do so away from the Company's premises building and that their presence does not cause a potential security hazard or create a poor impression of the Company.

X. **LINKS TO OTHER POLICIES**

X.1 Please note that the Wentworth Employee Policy Handbook contains guidance on the following areas which includes health and safety provisions:

- (a) business travel;
- (b) drugs and alcohol.
- (c) performance management (including the consideration of stress management)

XI. **DOCUMENT HISTORY**

18 February 2021: Approved and adopted by the Board of Directors of Wentworth Resources Plc