



Health, Safety & Environment Policy

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1. INTRODUCTION

This document outlines the company's approach and commitment to fulfilling its statutory and other Safety, Health & Environment (SHE) obligations. It describes the links to the NG Bailey Safety, Health & Environment (SHE) Management System, which is based on ISO 45001 & ISO 14001. It also describes the NG Bailey SHE strategy and performance reporting systems ensuring that each area of our operational business activities are effectively administered. It is provided for the purpose of ensuring that all NG Bailey staff are fully aware of their responsibilities in line with the organisation and the arrangements provided to implement this Health, Safety & Environment Policy.

This policy applies to all NG Bailey Group operations, including NG Bailey Limited, NG Bailey Facilities Services Limited, NG Bailey IT Services Limited, OSM Ventilation and Freedom Group of Companies

2. ORGANISATIONAL CONTEXT

This NG Bailey Health, Safety & Environment Policy covers all facets of the NG Bailey Group and includes all internal & external factors, for example, competence, contractor management, procurement & outsourcing, that may impact the SHE management system.

NG Bailey has many 'interested parties' both internal and external, for example, our shareholders, NG Bailey family members, employees, clients, statutory & third-party bodies, local government, specialist subcontractors/suppliers etc.

Information about interested parties' needs and expectations is reviewed as part of our normal business practice, strategic and business planning etc.

2.1 GLOBE structure and SHE Culture

At NG Bailey we are committed to embedding a continuously improving culture of SHE into all aspects of our undertaking. This is based on our principle of Safety First & Foremost, which in turn is supported by our long term SHE Strategy based on our GLOBE principles.

Our strategy consists of five key elements:

- Governance:** How we manage H&S is based on the 'Plan, Do, Check, Act' model
- Leadership:** Ensuring leadership at every level is visible and felt
- Ownership:** Everyone understanding their responsibilities and being accountable for their actions
- Behaviour:** Introducing new processes to positively affect culture change
- Environment:** Ensuring healthier and safer workplaces



2.2 Safety first & foremost - Governance

Good SHE governance is a vital part of how we operate and how we are held accountable. NG Bailey has developed a SHE governance model based on Plan, Do, Check, Act. This is implemented through Senior Leadership Teams (SLT) and is key to ensuring we can deliver our responsibilities as SHE leaders.

To ensure we do this as effectively as possible, we have integrated SHE management into our organisation from the Group Leadership Team (GLT) down. Each division has identified its key risks and issues and has embedded effective plans to control these risks. We have robust policies and procedures in place which, together with our standards and expectations, make up our SHE management system.

We review SHE performance at every level, inclusively working with, and supporting our supply chain to ensure they meet or exceed the standards and expectations that we have set.

2.3 Organisational structure – Operational Divisions detail

Our **Group Leadership Team (GLT)**

Chaired by our Chief Executive Officer, Jonathan Stockton, our Group Leadership Team is the senior management team responsible for driving the operational and strategic performance of the business.



Jonathan Stockton
Chief Executive Officer



Clare Salmon
Group Finance Director



Rob Smith
Group HR Director



Craig McGowan
Group Commercial Director

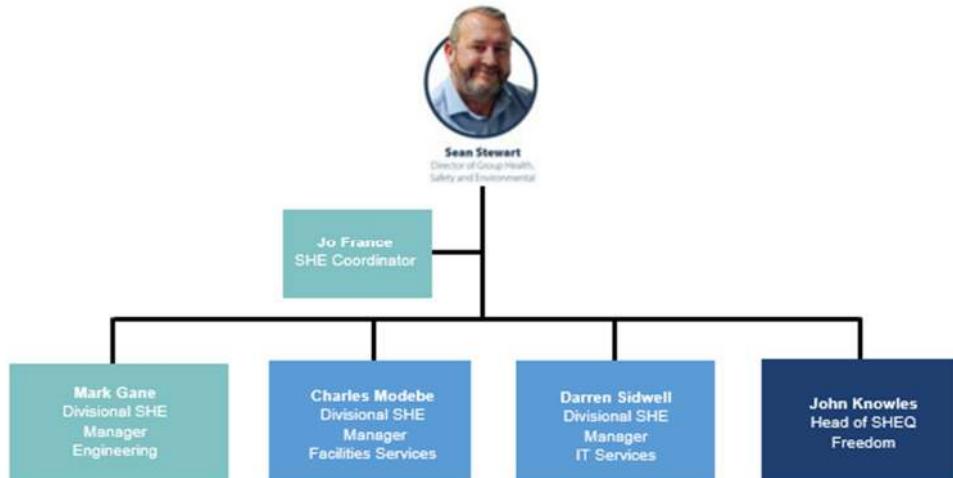


Paul Aulton
Managing Director
Built Environment



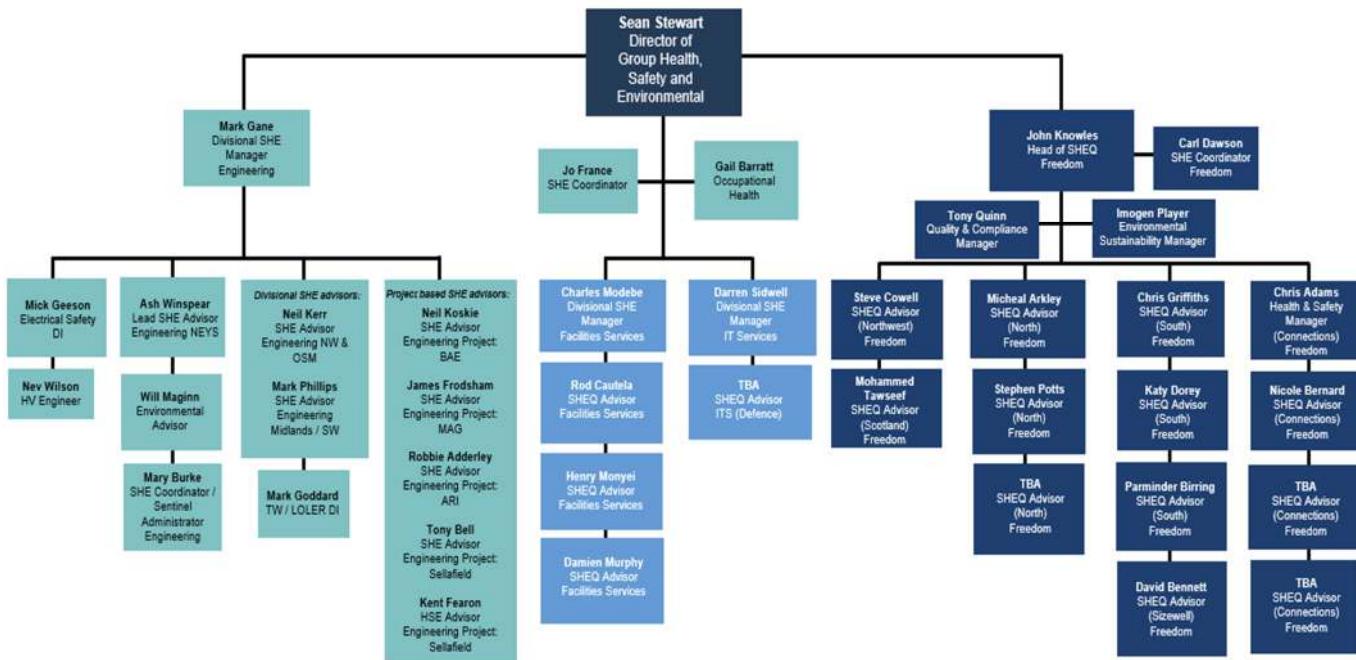
Carl Clay
Managing Director
Freedom

2.4 Safety, Health & Environmental (SHE) Leadership Group



Terms of Reference can be found in the NG Bailey Health, Safety & Environment Governance Guidance document.

2.5 SHE Organisational structure



3. LEADERSHIP & WORKER PARTICIPATION

3.1 Safety first & foremost - Leadership

Visible and felt leadership is crucial to successful SHE management and performance. We will establish SHE leadership groups at every level to ensure engagement, understanding and communication of our expectations. At NG Bailey we believe that all our personnel and our supply chain are SHE leaders and we expect everyone to demonstrate role model behaviour.

Our senior leaders will establish clear expectations, standards and processes based on our belief of Safety First & Foremost. The SHE Leadership Group is there to set the Vision, Expectations and Milestones for the Group with regard to SHE.

3.2 H&S Policy and Statement of Intent

At least annually, the NG Bailey Chief Executive Officer will review the Health & Safety Policy Statement and the Environment Policy Statement and amend or update, if necessary, based upon company performance or new requirements.

These policy statements will be made readily available to all employees and relevant parties. NG Bailey has separate policy statements of intent in support of our separate Health & Safety and Environmental registrations, ISO 45001 & ISO 14001.

SAFETY FIRST & FOREMOST MISSION STATEMENT

Mission statement

Health and safety is firmly ingrained in NG Bailey's philosophy. Our legacy has seen us continually strive to reduce risks, and protect our people and stakeholders, by building a culture where safety really is, first and foremost. Although we remain one of the leading companies in our sector, we are continuously striving to develop new, safer and healthier methods of delivery.

Delivering our mission

The Group Leadership Team is committed to ensuring that everyone in our business and in our supply chain are engaged and focused on safety 'first and foremost' at all times.

Our leadership will support and encourage everyone working on behalf of the company. In buying into this mission critical strategy, we will recognise positive behaviours, learn and act on emerging trends and we will address poor performance.

Treating health like safety

We are putting the health into health and safety by nurturing a health and wellbeing ethos that protects our people, supply partners and clients from workplace health risks, empowering and enabling them to make informed lifestyle choices.

We acknowledge the challenge and are committed to working across our sectors to blueprint a healthier future.

This includes the mental health and wellbeing of our people.

Group Leadership Team:



Jonathan Stockton
Chief Executive Officer



Clare Salmon
Group Finance Director



Rob Smith
Group HR Director



Craig McGowan
Group Commercial Director



Paul Aulton
Managing Director, Built Environment



Carl Clay
Managing Director, Freedom

3.3 Safety first & foremost - Ownership

At NG Bailey our people take responsibility, not only for the surrounding environment and their own health, safety and wellbeing but for that of the people around them or people impacted by the work that they are doing.

Our Chief Executive Officer is ultimately accountable for our SHE performance and retains overall responsibility for the implementation of this Health, Safety & Environment Policy. We continue to promote and recognise everyone's ownership and involvement in SHE.

3.4 Key roles & responsibilities

Responsibilities for the Management of SHE within NG Bailey. Within NG Bailey, responsibility for the implementation, operation and performance of the SHE Management Systems lies with line management. To ensure that the policy, legal obligations and experience are applied effectively, line management is supported by the SHE organisational structure referred to on page 6 of this Policy. General responsibilities are given to all employees with additional responsibilities depending on their role.

3.5 Responsibilities – Employees

All employees should:

- Ensure that they take reasonable care of their own health & safety and the environment
- Take reasonable care not to put other people, fellow employees and members of the public at risk by what they do or don't do in the course of their work
- Read and follow the Health, Safety & Environment Policy and arrangements, procedures, guidance and instructions provided to them
- Respect and not interfere with any items that have been provided or put into place to ensure good health, safety & environmental care
- Identify and report all items of good practice / innovation to allow for continuous improvement in processes / ways of working across the organisation
- Report any incidents, injuries, or illnesses that they may suffer as a result of doing their work
- Remain vigilant and report all observations of unsafe acts or conditions to ensure they can be acted on and potentially prevent a more serious incident from occurring
- Co-operate with NG Bailey in all matters of SHE, including undertaking the training offered to them
- Inform NG Bailey of any information that may affect their ability to safely undertake their duties
- Utilise any appropriate personal protective equipment (PPE) or other equipment that is provided for the task they are undertaking
- Always report to their line manager any concerns over SHE for any tasks they have been asked to do, or they have been made aware of
- Where they believe that they will be at risk they have the right to refuse to undertake the work and discuss this with their manager to ensure that suitable and reasonable adjustments are made to make the job safe
- Must ensure they have been fully briefed on and have a good understanding of the task at hand, this includes the potential risks and appropriate measures to be implemented to prevent those identified risks from occurring.

Employees must always work in accordance with the instructions given and any written Risk Assessment / Method Statement / Briefing and / or operational procedures.

3.6 Responsibilities – The GLT

The GLT:

- Will approve a framework for the management of SHE and ensure that sufficient resources are available to enable the SHE Management Systems to function effectively

- Will provide positive leadership and promote an enthusiastic SHE culture at Senior Management level
- Will ensure that a Group Leadership Team (GLT) Director is appointed to have overall responsibility for leadership of the SHE functions
- Will ensure that decisions take proper account of this Health, Safety & Environment Policy and the associated SHE Management Systems
- Will maintain appropriate visibility of SHE risks within their areas, utilizing routine risk monitoring mechanisms
- Will ensure that current SHE issues are first on the agenda at GLT meetings and review SHE performance at Board / GLT Meetings by receiving and considering SHE reports that ensure the following are reviewed and if necessary, ensure that appropriate improvement action is taken:
 - SHE performance
 - Significant SHE achievements; and
 - Significant accidents and incidents and the outcome of investigations into their cause.
- Will carry out SHE Leadership visits at specified intervals
- Will ensure that they comply with their individual responsibilities in SHE matters
- Will appoint a competent person to carry out the functions and responsibilities of Director of Group Health, Safety & Environmental
- Will consult the Director of Group Health, Safety & Environmental on decisions affecting SHE management
- Will ensure that arrangements are in place to make all personnel aware of their own individual responsibilities under this Health, Safety & Environment Policy and those of any personnel under their control
- Will ensure that a clear disciplinary process has been defined and, where appropriate is applied, to address breaches of this Health, Safety & Environment Policy or SHE Management Systems.

3.7 Responsibilities – Directors & Heads of Department

Directors and Heads of Departments:

- Will co-ordinate the implementation of this Health, Safety & Environment Policy, organisation and arrangements in respect to ensuring compliance with our SHE obligations
- Will monitor the SHE performance and ensure that the SHE Management Systems is being fully implemented within their departments and take such actions as are necessary to remedy any shortcomings
- Will be actively engaged in the promotion of a positive SHE culture throughout the organisation and shall in particular provide their full support to ensuring the following:
 - Providing adequate resources are made available within the organisation to implement all aspects of the SHE strategy
 - Effective implementation of this Health, Safety & Environment Policy and the SHE Management Systems within their sphere of operational activity / responsibility
 - Will liaise with the SHE team and the HR L&D Department to ensure that all staff within their departments are adequately trained in SHE matters
 - Actively leading the SHE leadership teams
 - SHE Performance is included in the 'management review process' implemented within their business area
 - Accidents, incidents and dangerous occurrences within their sphere of operational activity / responsibility are reported and investigated in accordance with the company incident reporting & investigation procedure
 - Be part of and ensure all personnel within their business areas carry out regular SHE audits, tours or inspections of projects / commissions as per agreed schedules and record the results
 - Will know the broad requirements of SHE legislation and have a working knowledge of the SHE Management Systems
 - Will ensure that effective liaison with third party stakeholders, clients etc. is undertaken and recorded as necessary. In order to ensure that SHE matters raised are effectively resolved and communicated prior to work commencing.

3.8 Responsibilities – Managers

Managers:

- Will ensure that the company SHE strategy is implemented on all projects / commissions and activities under their control including:
 - Promoting a positive SHE culture of worker consultation, participation and engagement
 - Maintaining a comprehensive understanding of the SHE Management Systems
 - Monitoring the performance of SHE on their project / commission and ensure all personnel carry out regular SHE inspections and record the results / observations
- Make arrangements for SHE Induction Training for all new starters at the workplace under their control
- Ensure appropriate levels of duty of care to the workforce are maintained
- Will monitor the SHE performance and ensure that the SHE Management Systems is being fully implemented within their departments and take such actions as are necessary to remedy any shortcomings
- Will ensure that all staff within their area of responsibility are familiar with those parts of the SHE Management Systems, which affect them or the activities in which they are engaged
- Will liaise with the SHE team and the HR L&D Department to ensure that all staff within their departments are adequately trained in SHE matters
- Will check that the proper SHE procedures are followed for the reporting and recording of all accidents and incidents within their area of responsibility
- Will know the broad requirements of SHE legislation and have a working knowledge of the SHE Management Systems.

3.9 Responsibilities – Supervisors & Engineers

Supervisors and engineers:

- Will provide positive leadership on SHE issues for the members of the work team for which they are responsible
- Will monitor that work is carried out in accordance with relevant Risk Assessments / Method Statements and briefings
- Will monitor that personnel under their control comply with their individual SHE responsibilities
- Will give personnel under their control, including contractors, clear instructions about the required safe methods of work
- Will ensure that all relevant personnel are involved in Risk Assessments prior to any work activity commencing, and, where appropriate, that briefings are available, understood and that any identified control measures are correctly implemented
- Will, where appropriate, assess and implement any additional controls required to address the needs of new employees, young persons, non-English speaking workers, disabled persons, pregnant women, etc.
- Will monitor that Risk Assessments / Method Statements and briefings accurately reflect the hazards present and ensure that any required changes are agreed and implemented in accordance with the arrangements for control of changes to planned methods of work
- Will ensure appropriate arrangements are in place for two-way communication and where appropriate deliver Risk Assessments / Method Statements and briefings to the work teams
- Will identify any SHE training requirements of personnel under their control and advise appropriate management accordingly
- Will see that accidents and incidents are reported immediately to the relevant manager
- Will ensure that personal protective clothing and equipment is used where identified as required and is properly maintained and stored
- Will ensure that the plant and equipment supplied is appropriate for the work and has any necessary certification. Ensure that plant and equipment is immediately put out of use if unsafe or presents a potential threat to the environment
- Will ensure that only authorised persons operate plant and equipment, and that unattended plant and equipment, materials and premises are left in a condition that does not present a risk to persons or the environment
- Will support senior managers in the delivery of SHE Management Systems on all projects / commissions.

3.10 Responsibilities – Commercial

The Commercial team will:

- Will ensure adequate financial resources are allowed for SHE, and that all necessary SHE associated costs are included for on all projects
- Will ensure that SHE performance of contractors is given equal consideration to cost in commercial decisions
- Will ensure that the appointment of contractors takes into account the SHE competence and capabilities of prospective contractors and gives this the same level of validation as the contract costs
- Will ensure during the planning stage, where practicable, in consultation with the identified project teams that:
 - The most appropriate safe methods of working will be adopted
 - The provision of welfare facilities will be planned
 - The SHE responsibilities of contractors and others are considered
 - The most suitable materials will be used
 - The arrangements for the protection of the Client's Operatives, Members of the Public, especially children, and visitors plus any others working on our sites are considered
 - Will ensure that the NG Bailey procedures for procuring contractors are complied with.

3.11 Responsibilities – Procurement

Procurement will ensure that sub-contract orders allow for the following:

- Tendering contractors have been provided with the NG Bailey 'SHE Terms & Conditions for Sub-Contractors' and that compliance with them is a condition of contract
- Will ensure liaison with SHE team is carried out in relation to sub-contractor appointments
- Ensure that the NG Bailey procedures for procuring contractors are complied with
- Suppliers of materials, plant and equipment etc. are requested to provide all necessary information and operating instructions so that their products can be used safely without risk to persons or the environment
- Where such information is received by the buyer, ensure that it is passed on to the people who will use the materials, plant and equipment etc.
- Orders to suppliers for personnel include sufficient detail to adequately describe the work for which they are required
- Contractors and labour agencies are assessed as competent and adequately resourced for the work before contracts are placed
- No undertakings, either verbal or written, are given to any supplier, relieving it of its SHE responsibility
- Monitor that the above arrangements are effectively implemented.

3.12 Responsibilities – Design

The design team:

- Will be aware of their individual responsibilities as designers under the Construction (Design & Management) Regulations 2015
- Will ensure, as necessary, relevant sub-contractors are carrying out their duties under Construction (Design & Management) Regulations.
- Will ensure that designs deliver the following:
 - Designs which recognise, include and apply safe practice during preparation, construction and subsequent operational use and maintenance, and which consider lifecycle environmental impact including decommissioning and disposal
 - Design / engineering / planning interfaces are co-ordinated to ensure that the project can be carried out with minimum risk to persons and environment
 - Designs will include energy efficient solutions incorporating environment friendly products & materials
 - The principle of prevention is applied to design risks and where possible, construction hazards are eliminated through the design process

- Ensure that the above arrangements are effectively implemented in accordance with the requirements of the Construction (Design & Management) Regulations 2015.

3.13 Responsibilities – Visitors

Visitors:

- Will report to the office / reception immediately upon arrival
- Must receive a Visitors' SHE Induction and always be hosted by a member of staff
- Will follow all site-specific SHE rules received and use the designated access / egress routes provided
- Will report any incidents or unsafe acts or conditions to their host
- Will wear standard protective clothing and equipment to include hard hat, steel toe capped boots, hi-visibility vest or jacket, light eye protection and gloves as required
- Will ensure that they comply with all SHE procedures / requirements etc.

3.14 Safety first & foremost – Behaviours

As a part of our developing culture, we endeavour to train all our employees in the mechanisms of behavioural safety. A Safety First & Foremost course has been developed. We will continue to work to introduce new behavioural processes to embed health and safety standards in everything we do.

3.15 Engagement – Communication, participation & consultation

3.15.1 Communication

NG Bailey maintains a number of methods to communicate SHE information to its employees, but all originate from the organisational computer intranet system called the Portal. This information includes but is not limited to:

- **NG Bailey SHE Management System**

The documented content of the management system is readily available to all employees through the portal. New updates to this system are communicated (updated procedures, guidance) are indicated through this system in the first instance

- **News Items**

News items are regularly posted onto the portal providing regular up to date information to all employees regarding important health and safety issues

- **Visual Standards**

NG Bailey continues to develop visual standards to cover many of its processes to demonstrate to all employees what good SHE practice looks like

- **Knowledge Shares & Health & Safety Alerts**

Best practise / innovation and learning items arising from observed issues and incidents at projects (and from external sources too if pertinent to NG Bailey operations) are published in the form of Knowledge Shares and SHE Alerts which are again available for review by all NG Bailey employees via e-mail cascade from senior leaders and via the portal

- **Alerts and Knowledge Shares**

NG Bailey has a programme of key monthly messages issued to all personnel; these are followed up with associated SHE Shares on a weekly basis. These are positive communications designed to be used at the start of meetings / daily briefings to generate proactive discussion to allow teams to improve their SHE performance

- **Statutory & company notices / signs**

Every operating location must have a SHE Notice Board positioned in an appropriate location and maintained with up to date SHE information. This is to ensure that information is consistently displayed at all operating locations and that everyone has access to key H&S information.

The notice board is a visual indicator of the company commitment to H&S excellence and therefore should reflect the highest possible standards in appearance and information provided. The SHE team has developed a standard Office H&S notice board.

The contents of which are listed below:

- Accident Procedure
- Office Contacts
- Employer's Liability Insurance certificate
- H&S Law Poster
- Communication Section – latest SHE Alerts and / or Knowledge shares
- Emergency Information / Route to nearest hospital
- Emergency Procedures, Fire Marshalls and First Aiders
- Health & Safety Policy Statement
- Environmental Policy Statement

The maintenance and upkeep of these boards is the responsibility of the Office Manager / Responsible Senior Manager who is listed in the Office Health, Safety, Environment & Security (H, S, E, S) Plan. Project / Contract Managers are responsible for ensuring that the above information is developed, kept up to date and maintained in good order throughout the duration of a project / commission.

NG Bailey also ensures that its supply chain and other relevant interested parties are kept informed of relevant SHE information. Such methods include:

- **Supply Chain Forums**

NG Bailey operates regular forums. These include an annual supply chain forum where supply chain directors are invited to discuss collaborative business health and safety performance and issues arising.

- **Requests for Health & Safety Information**

NG Bailey receives regular requests for health and safety information from external sources. Such requests are evaluated within the SHE team and may be supplied accordingly. This could be in association with bid responses; from external 3rd parties, such as regulatory or certification bodies.

If the request for health and safety information is considered detrimental to the business, then such information may not be supplied.

3.15.2 Participation & consultation

- **Project / commission workforce SHE meeting**

Consultation will take place with the workforce by way of safety briefings and pre-start briefings

The meeting should be chaired by the Project / Contract Manager or nominated deputy and will comprise of representatives from the Project Management Team, key contractors and trade unions (if applicable)

- **Project Day-to-Day SHE Communication**

Employees and contractors with concerns regarding SHE issues should in the first instance raise the issue with their line manager

Visitors with concerns over SHE issues should communicate them to their escort on the day or to a member of the Project Management Team

If the line manager has been unable to resolve the matter, then the matter should be brought to the attention of the Project / Contract Manager or nominated deputy, who will note their concerns, if possible, resolve the issue or if appropriate bring the matter to the next workforce consultation meeting

An NG Bailey SHE team member will visit projects / commissions and employees and contractors are also encouraged to raise any SHE issues with them

NG Bailey encourages the involvement of trade unions and will be pleased to deal with concerns raised by recognised representatives either on a formal or informal basis.

4. PLANNING

4.1 Risk assessment

All operations are subject to risk assessments in order to minimise potential risks to employees and all those that may be potentially affected. Risk assessments must be undertaken in advance of any operation and should be appropriately documented and reviewed for adequacy only by those persons who are seen as competent to do so.

Risk assessments may vary in complexity dependent upon:

- the nature of the works being undertaken
- the environment in which the works are to be undertaken
- the persons who are undertaking such works.

Whilst suitable and sufficient task specific risk assessments will be developed as per the requirements of The Management of Health & Safety at Work Regulations (1999), NG Bailey maintains a number of risk assessment methodologies to meet the requirement of other specific legislative requirements e.g. display screen assessments, manual handling assessments, noise assessments, lifting assessments & hand arm vibration assessment etc. The operation and use of such assessments can be found in the relevant sections of the SHE Management Systems on the Portal.

It is also expected that managers should undertake workplace assessments when placing employees in environments where NG Bailey do not have direct control over the operations being conducted e.g. placed within a client workplace.

All suppliers undertaking works on behalf of NG Bailey must produce risk assessments that are suitable and sufficient for the works to be undertaken. These may be supplemented by the inclusion of a method statement to cover the works to be undertaken.

4.2 Business sector risk arrangements

Where a client requires specialised, SHE risk management arrangements e.g. working within the rail or nuclear sector, additional requirements may be required to those contained within the SHE Management Systems. In such cases localised arrangements in terms of documentation is created as required.

Although this documentation still forms part of the SHE Management Systems these may require evaluation through sector specific inspections and audits that are included within additional 3rd party audits in addition to those undertaken for ISO 45001/ ISO 14001 registrations. The relevant Business Sector Director will be responsible for ensuring that these are undertaken on an annual basis.

4.3 SHE legal and other requirements' Register

NG Bailey maintains a process to review and to take into account a SHE legal and other requirements that will have an impact upon all levels and within all sectors of its business operations.

The register(s) shall be reviewed on a regular basis, be kept up to date and relevant information taken into account in all processes and procedures and readily communicated to all NG Bailey personnel as necessary. A copy of the register(s) is available on the Portal.

4.4 Establishing performance measures

4.4.1 GLOBE H&S objectives, targets & KPI's

The SHE Leadership Group will set measurable high level organisational objectives and targets in line with the NG Bailey SHE strategy (Fig 1).

These objectives and targets shall be disseminated through each tier of the business (the boxes to the left) commencing from the SHE Leadership Group to create discernible measures (the boxes to the right) that are cascaded to the next tier below.

In this manner, high level business requirements can be translated to requirements at an individual project level. Measurement of the effectiveness of SHE arrangements can then be made at all levels through regular reporting (e.g. monthly) through each tier and reported back to the SHE Leadership Group accordingly.

Fig 1. GLOBE KPIs

Governance	Training Plan	Divisions to have a training plan to deliver training requirements set out within each divisional SHE Training Matrix.	Fully populated SHE training matrix: <ul style="list-style-type: none"> - All required training identified per individual / role - Completion dates up to date. - Training commencement dates in place as known - A well trained, competent organisation as an industry leader. 	
	SHE Leadership meeting governance structure in place	Demonstrate that a robust governance structure is in place utilising the standard agenda to ensure that GLOBE is consistently cascaded throughout the organisation	SHE Leadership meeting governance structure in place	
Leadership			Standard agenda and items of reference in use	
			SHE Leadership meetings being held as per agreed frequency per division	
			Outputs recorded and accountable owners identified	
Leadership Tour	One SHE Leadership Tour per quarter by the GLT and their SLT members which includes observations (+ or -) reported into the SHE team	NG Bailey senior leaders to undertake specific SHE tours of their sites where they proactively demonstrate their commitment to, SHE by engaging with the workforce & discussing SHE issues, etc. One Tour must be done jointly with a member of the SHE team		
Ownership	SF&F BU Comms	100% of Business Units delivering a quarterly SF&F communication cascaded to the team by GLT Member or BU Director	Ensure all personnel are engaged with relevant, up to date information and knowledgeable in associated good SHE practices	
	Sub-contractor Management	All projects to collate sub-contractor SHE performance on a monthly basis	Supporting the continuous improvement of the NG Bailey supply chain SHE performance by identifying key risks and issues and working in collaboration with the supply chain	
Behaviour	Observation reporting	All business units to report at least 25 observations (+ve /-ve) on a monthly basis	All NG Bailey personnel and sub-contractors recognise the importance of reporting, recording, investigating and resolving hazards, near misses and unsafe acts/conditions as positive interventions together with the identification of best practise and innovation to prevent occurrence of more serious accidents	
Work (Environment)	Workplace Inspection	All office locations to have an office inspection completed by the most senior manager in the office every quarter All sites to have a monthly inspection completed by the site / project manager	Ensuring all offices / sites are safe and health work environments whilst ensuring compliance with NG Bailey standards and expectations At least one office inspection must be done jointly with a member of the SHE team	
	Office H. S. E & S Plan	All office locations to have an up-to-date Office Health, Safety Environment & Security Plan in place	New Office Health Safety, Environment & Security plan implemented to ensure all office environments look and feel the same with regards to the standards expected	
	Mental Health training	All office locations to have an up to date SHE notice board in place	Consistent approach to ensure all relevant information is provided to all personnel	

4.4.2 Proactive & reactive health and safety arrangements (lead and lag performance)

NG Bailey maintains systems for proactive and reactive SHE processes so that the effectiveness of the SHE Management System can be evaluated. This is achieved from a perspective of how processes and procedures are being implemented within business operations (proactive – lead measurement of SHE performance e.g. monitoring arrangements – audit & inspection) and in the event of non-conformance leading to breakdown in SHE Management System application (reactive – lag measurement of SHE performance e.g. accident, incident, unsafe act or condition and trend analysis).

5. SUPPORT

5.1 SHE management support – Director, managers, & advisors

The Director of Group Health, Safety & Environmental, Divisional Heads of SHE, Divisional H&S Managers, SHE Advisors, and the SHE Co-ordinators provide services to support line management in discharging its safety, health, environmental responsibilities.

The service provided includes:

- Providing positive leadership, advice & guidance for all parts of the business on SHE issues and promote the adoption of SHE best practice
- Review and development of this Health, Safety & Environment Policy, and Procedures
- Review and development of proposed SHE training
- Information on current and proposed SHE legislation
- Dissemination of information including procedures, statistics, and Group wide current experiences
- Preparation and issue of SHE Management System documentation
- General overview of SHE performance and provision of performance reports
- Guidance on identifying hazards and assessing risks
- Ensuring appropriate processes are in place for the reporting of accidents & incidents etc.
- Investigating accidents & incidents as per NG Bailey procedures
- Site / Office inspections and audits
- Promoting an enthusiastic SHE culture that delivers positive commitment to, and engages all employees in, continuous improvement in SHE performance
- Monitoring the SHE performance and ensure that the NG Bailey SHE Management System is being fully implemented across the regions and take such actions as are necessary to remedy any shortcomings
- Providing support and assistance to the whole business regarding the assessment of supply chain competency, in terms of SHE, and ensure appropriate and robust procedures are developed, implemented and maintained
- Developing and maintaining all internal audits and reviews necessary to support and maintain the accreditation to ISO 45001 / ISO14001.

Team Purpose

*'The purpose of the SHE function
is to provide leadership, engagement &
influence throughout NG Bailey to deliver an
effective working environment for success'.*

What we mean by 'Leadership':

- Thinking ahead & thinking differently rather than just following convention
- Removing barriers & Identifying solutions
- Being visible & felt
- Creating the right working environment to influence & engage excellence
- Champion GLOBE throughout the organisation

What we mean by 'Engagement':

- Ensuring we use evidence to support our guidance & advice
- Coaching people to unlock their potential
- Provide the right information to our stakeholders
- Develop the confidence in others to take personal responsibility
- Helping find ways to ensure Safety First & Foremost

What we mean by 'Influence':

- Using our passion & integrity to stimulate others
- Being confident and assertive in our approach
- Developing relationships so people have faith in us
- Endeavouring to excite others' imagination
- Drawing energy from the motivation we create in others

5.2 Training requirements

NG Bailey is responsible for ensuring that its direct employees are competent to carry out the SHE functions that their roles require, bearing in mind that competence is defined as a combination of skills, knowledge, attitude, training and experience (SKATE). NG Bailey keeps detailed SHE training records for all direct employees. The Learning and Development (L&D) department of HR, manage these records.

Training at induction will be given and then a system of ongoing training will be provided to ensure that each person is suitable and sufficiently trained to carry out their role. Minimum levels of training are required as per job descriptions for all personnel. Refresher training will be provided as per statutory provision or relevance to role.

Line Managers must ensure that staff under their control are adequately trained before allocating any SHE responsibilities to them.

The need for additional project specific training to ensure awareness and management capability of particular hazards or processes should be identified within the planning phase of the project to ensure individuals can receive training well in advance of the particular works starting.

Project / Contract managers are responsible for ensuring that any sub-contractors working on our behalf are competent to undertake the task before they start work.

Each division in NG Bailey will have a bespoke training matrix and will incorporate training requirements specific to the division. All training will be managed by each division in liaison with the HR L&D Department.

6. SHE DOCUMENT CONTROL, RECORDS & ARCHIVE

All documents issued for use in the operation of the SHE Management Systems shall be allocated a unique number from the register of documents. The allocated number will be incremented at each subsequent modification.

A master index of Management Systems Documents shall be maintained by the Director of Group Health, Safety & Environmental.

The Director of Group Health, Safety & Environmental will maintain records relating to the performance of the SHE Management System.

Records will include the following:

- Superseded SHE documents
- Audit reports – both internal and external
- Audit programs
- SHE Leadership Meeting Minutes
- Correspondence with HSE (and other enforcing authorities)
- Other correspondence relating to SHE matters, not relating to a particular project
- Accident and incident records
- Document control records.

Documents will not normally be disposed of but scanned and retained in electronic format. Disposal of all such electronic records is not anticipated at this stage; however, no such disposal will take place prior to 10-years elapsing and will be authorised by the Director of Group Health, Safety & Environmental.

7. OPERATION

7.1 Safety first & foremost – work environment

To reduce risk and ensure healthier and happier workplaces within NG Bailey, all elements that form a fundamental part of how NG Bailey 'operates' on a day-to-day basis must be considered.

7.2 Treating health like safety

We are putting the health into health and safety by nurturing a health and wellbeing ethos, that protects our people, supply partners and clients from workplace health risks, empowering and enabling them to make informed lifestyle choices.

We acknowledge the challenge and are committed to working across our sectors to blueprint a healthier future. The continued health and wellbeing of all NG Bailey employees is paramount to the effective operation of the business. NG Bailey operates a drug and alcohol procedure which all employees must adhere to.

For details relating to health at work and also with regards to drugs and alcohol please refer to the relevant information contained on MyNGBailey.

7.3 Office SHE

All NG Bailey office locations will have a specific Office Health, Safety, Environment & Security Plan. This plan details the roles and responsibilities of key personnel to ensure we manage SHE in the office environment effectively. The plan covers the most fundamental aspects of SHE and by complying with the plan and completing the appropriate forms, the office will be well-placed with respect to fulfilling its legal obligations.

The Office Health, Safety, Environment & Security Plan together with an office specific risk assessment is communicated to all personnel and is available on the office notice board.

7.4 Implementing NG Bailey Health & Safety Arrangements – Management System

In order to implement the NG Bailey Health & Safety Policy Statement requirements and all arrangements as indicated within this document, the business has a fully documented Health & Safety management system that sets out the standards expected to be operated within all of its projects and programmes.

In order to achieve this, the management system is available to all employees in the form of policies, procedures, operational documents (forms and templates etc.) that are all readily downloadable for use, on the company portal, MyNGBailey.

This system meets the requirement of the Occupational Health and Safety Assessment System (ISO 45001), the system is maintained internally by the Director of Group Health, Safety & Environmental who will act as the NG Bailey H&S Management Systems representative.

7.5 Implementing NG Bailey Environmental Arrangements – Management System

In order to implement the NG Bailey Environmental Policy Statement requirements and all arrangements as indicated within this document, the business has a fully documented Environmental Management System that sets out the standards expected to be operated within all of its projects and programmes. In order to achieve this, the Environmental Management System is available to all employees in the form of policies, procedures; operational documents (forms and templates etc.) that are all readily downloadable for use.

This system meets the requirement of the Environmental Assessment Framework (ISO 14001:2015). The system is maintained internally by the Director of Group Health, Safety & Environmental.

7.6 Change management

Where new SHE requirements or substantial changes to existing requirements are identified, the potential effects of these will be communicated to NG Bailey senior management in the first instance.

This may lead to changes to business operations, the effects of which shall require changes or the creation of appropriate procedures and other documentation that shall be added to the H&S Management System. This process will be managed through the SHE team.

Changes to existing documentation or the creation of new documents will be communicated to all NG Bailey personnel as necessary through the Portal and other internal communication media.

8. PERFORMANCE EVALUATION

8.1 SHE statistics analysis

The compilation of SHE statistics is an essential tool that enables the company to monitor performance and continually improve the business SHE performance. Statistics are collated in standard formats that enable the company to benchmark performance against our competitors and also supply clients with information as required.

The collation of accident / incident records will be carried out by the SHE team and used to develop and promote the trend analysis of this data. The accident / incident types will be collated using the HSE accident type categories to ensure the data follows recognised categories.

The SHE team will prepare a monthly report detailing the Company's Accident Incident Rate (AIR), Accident Frequency Rate (AFR) & Environmental Incident Rate (EIR) and trend analysis for submission to the GLT.

The SHE team will prepare a monthly report detailing the Divisional Accident Incident Rate (AIR), Accident Frequency Rate (AFR) & Environmental Incident Rate (EIR) and trend analysis for submission to the Divisional SLT Meetings.

8.2 SHE Monitoring

NG Bailey maintains systems for proactive and reactive SHE monitoring arrangements so that the effectiveness of the SHE Management Systems can be evaluated. This is achieved from a perspective of how processes and procedures are being implemented with business operations (proactive – lead measurement of SHE performance) and in the event of non-conformance leading to breakdown in application (reactive – lag measurement of SHE performance).

Wherever practicable all NG Bailey projects / commissions will record and monitor SHE information relating to:

- Accidents
- Incidents
- Don't Walk By's (Safe / unsafe acts & conditions, near misses)
- Good operational behaviour
- Audits
- Inspections
- Tours
- Recording visits from regulators and other 3rd parties (as relevant to the project).

It is also an NG Bailey requirement that its supply chain should also be a major part of the monitoring process and must report this information whenever they are working on behalf of NG Bailey. This information is to be provided by the Divisional Heads of SHE to the Director of Group Health, Safety & Environmental each month. This will form the GLT & Board reports together with supplementary detail.

8.3 Inspections, audits and senior leadership tours

Arrangements will be made to undertake a schedule of planned inspections, audits and Senior Leadership Tours (possibly including the client or their representative) to be undertaken throughout a project / commission lifespan.

All personnel at Operations Director level and above are committed to undertaking a minimum of 4 Senior Leadership Tours per year whilst the SHE team will undertake regular inspection & advisory visits on projects / commissions, with managers and supervisors undertaking site inspections and statutory inspections as required.

8.4 SHE Assurance

SHE Audits will be performed by

- The SHE team – internally.

External parties who may carry out audits include:

- Accreditation bodies
- External clients.

All internal audits will be performed in accordance with standard auditing procedures, which will respect ISO 45001 & ISO 14001. Individual projects will be audited on a sample basis; however, those projects to be audited will be given advanced notice. The advance notice will be no less than one calendar week. The SHE team will maintain an electronic file of all audits.

8.5 Policy and H&S management system review

The whole content of the SHE Management Systems shall be reviewed throughout the year through regular monthly update meetings with the Director of Group Health, Safety & Environmental & Divisional Heads of SHE.

Areas that shall be covered shall include:

- Adequacy of the system to meet business needs
- Changes required
- Review of the outcome of management system and project audits and inspections
- NG Bailey SHE specialists updates.

This will be further supported by discussions at the SHE Leadership Group in reviewing:

- Adequacy of this Health, Safety & Environment Policy, and arrangements to meet the continuing need of the business
- Review of SHE objectives and targets/key performance indicators (KPIs).

9. IMPROVEMENT

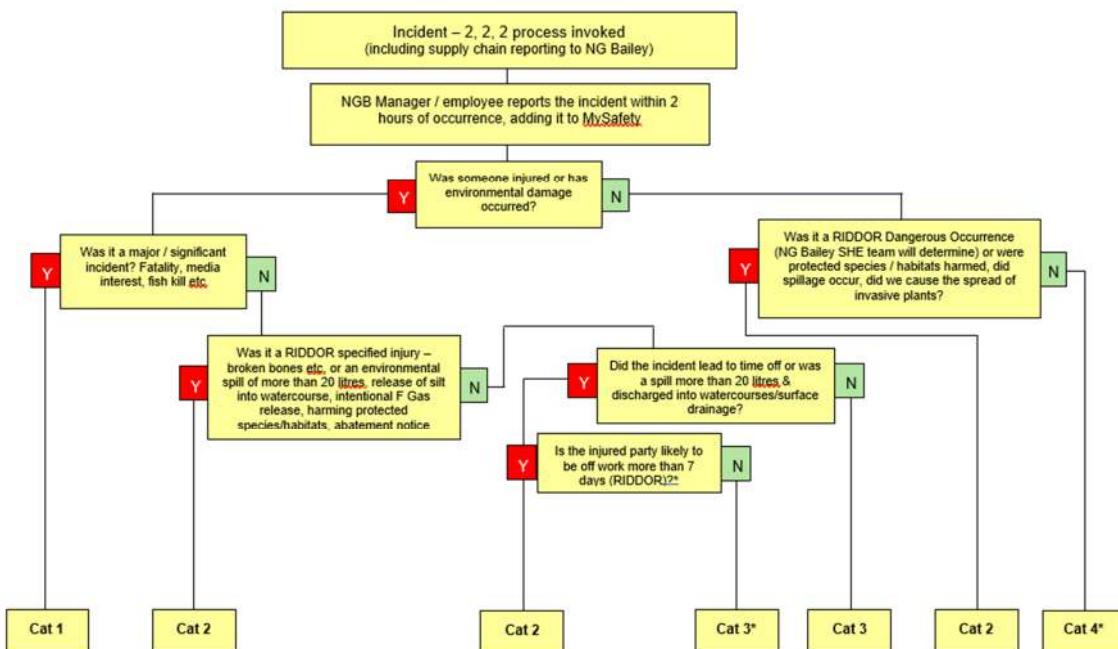
9.1 Incident reporting, investigation & corrective action

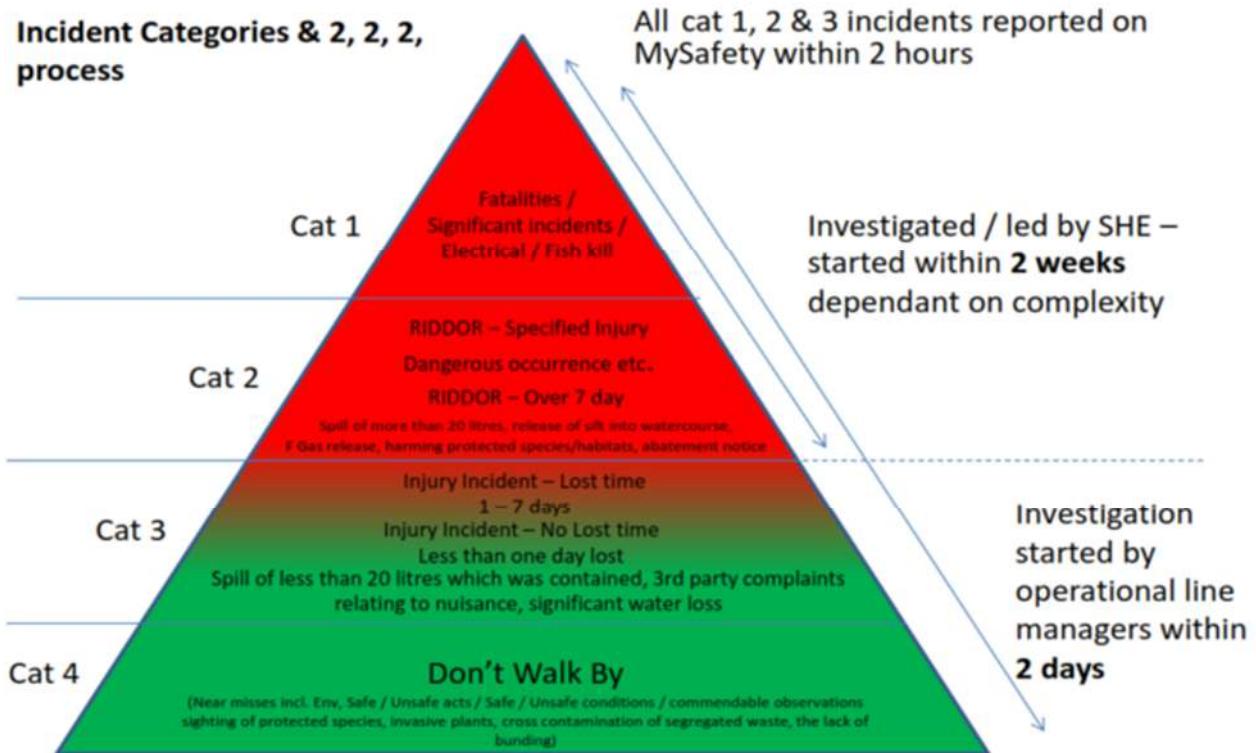
All incidents and near misses, unsafe act / condition observations, including Environmental incidents must be reported following the incident reporting procedure contained within the SHE Management Systems on the Portal. Where the incident has the potential to be 'significant', then these must be reported as soon as possible using the 2-hour First Alert process.

Significant incidents must be formally investigated as soon as possible following the investigation process; again, this can be found within the SHE Management Systems.

A summary of the procedures to be followed following an incident are shown on the Incident Reporting Procedure Flowchart & Accident / Incident triangle on the next page.

Incident Reporting & Investigation Process GSF/SHE/S/054

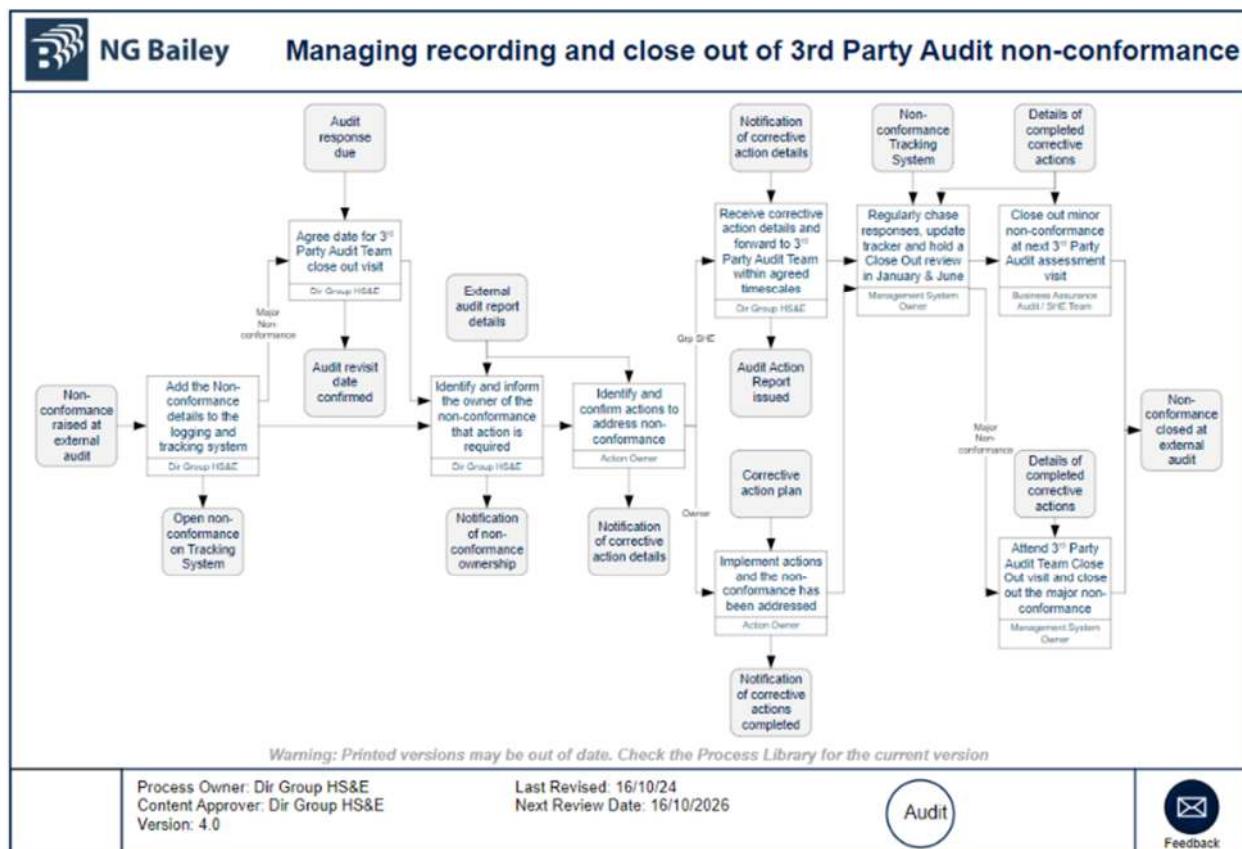




9.2 Emergency Planning

NG Bailey maintains a procedure for emergency planning in the event of incidents that may have a significant effect upon the project or operations, such as ceasing all works to deal with the emergency. In order to ensure that such events are dealt with in the most effective and robust manner, such plans shall be suitably communicated to all employees, planned, tested and reviewed accordingly. A process to cover emergency planning is maintained with the SHE Management Systems.

9.3 Nonconformity & corrective action process map



10. DOCUMENT HISTORY

10.1 Document owner and approval

The Director of Group Health, Safety & Environment is the owner of this document and is responsible for ensuring that this policy is reviewed in line with legal requirements as well as emerging best practice.

A current version of this document is available to all members of staff on the NG Bailey intranet. It does not contain confidential information and can be released to relevant external parties.

Signature:

Date: January 2026



Jonathan Stockton

Chief Executive Officer

For and on behalf of the Board of the Company

10.2 Change amendment summary

Document Amendment Summary

This document is published as a controlled document but will be uncontrolled once downloaded or printed. The document will be reviewed periodically.

Issue Date	Version	Author	Approved by	Details of Changes
Nov 20	GSOP/SHE/S/036/02	Matt Dixon	David Hurcomb	Policy review
Nov 21	GSOP/SHE/S/036/03	Matt Dixon	David Hurcomb	Policy review
Nov 22	GSOP/SHE/S/036/04	Sean Stewart	David Hurcomb	Policy review
Jan 24	GSOP/SHE/S/036/05	Sean Stewart	David Hurcomb	Policy review
Jun 24	GSOP/SHE/S/036/06	Sean Stewart	Jonathan Stockton	Change of CEO
Oct 24	GSOP/SHE/S/036/07	Sean Stewart	Jonathan Stockton	Policy Review
Jan 25	GSOP/SHE/S/036/08	Sean Stewart	Jonathan Stockton	Policy Review
Oct 25	GSOP/SHE/S/036/09	Sean Stewart	Jonathan Stockton	Changes to GLT & SHE team structure
Nov 25	GSOP/SHE/S/036/10	Sean Stewart	Jonathan Stockton	Document moved to new PIRE template & Inclusion of OSM Ventilation
Jan 26	GSOP/SHE/S/036/11	Sean Stewart	Jonathan Stockton	Policy Review

Issue Date	Version	Review Date	Author	Owner	Page
Jan 26	08	Jan 27	Sean Stewart	Jonathan Stockton	30
Review Date is 1 years from Issue Date			Retention Period is 5 years from Review Date		