

ECORA RESOURCES PLC

HEALTH & SAFETY POLICY

1. General Policy

1.1 Ecora Resources PLC (the "**Company**") is committed to ensuring the health and safety of staff and anyone affected by our business activities, and to providing a safe and suitable environment for all those attending our premises.

1.2 This policy sets out our arrangements in relation to:

- (a) assessment and control of health and safety risks arising from work activities;
- (b) preventing accidents and work-related ill health;
- (c) provision and maintenance of a safe workplace and equipment;
- (d) information, instruction, training and supervision in safe working methods and procedures; and
- (e) emergency procedures in cases of fire or other major incident.

1.3 This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, building contractors, homeworkers, casual workers and agency staff, or any other person who may work from or attend the Company's office at 3rd Floor Kent House, 14-17 Market Place, London W1W 8AJ.

1.4 *The Company's Duties*

The Company recognises its duties under the Health and Safety at Work etc Act 1974 (the "**Act**") and all relevant regulations made under it from time to time. While the Act does not specifically apply to contractors or consultants, the Company requires all contractors and consultants to comply with the policy and procedures and the term "employee" used below is taken to include contractors, consultants, directors, officers, senior managers, homeworkers, casual workers and agency staff.

1.5 The Company will conduct its business in such a way as to ensure that insofar as it is reasonably practicable employees who may be affected are not exposed to risks to their health and safety. Where such risks exist, information will be provided and reasonable steps will be taken to bring this to the attention of employees. All employees are obliged to support and co-operate with the Company in achieving this objective.

1.6 *Employer's Duties*

The Company is responsible for:

- (a) assessing the risk to health and safety of its employees and others who may be affected and identifying the measures needed to comply with its health and safety obligations;
- (b) providing and maintaining locations, equipment and systems at work which are safe and without risks to health;

- (c) ensuring that all necessary safety devices are installed and maintained on equipment;
- (d) providing information, instruction, training and supervision in safer working methods and procedures when appropriate;
- (e) providing and maintaining a healthy and safe place of work and providing a means of access to it;
- (f) promoting the co-operation of employees to ensure safe and healthy conditions and systems of work by discussion and effective joint consultation;
- (g) establishing emergency procedures as required;
- (h) establishing and reviewing the management of health and safety at work; and
- (i) keeping this policy under review and making any revision necessary from time to time.

1.7 *Responsibility for this Policy*

The Executive Committee has day-to-day responsibility for the implementation of this policy. The Executive Committee will be responsible for:

- a) appointing the Company's Safety Officers;
- b) reviewing all accidents and other incidents relating to health and safety;
- c) reviewing health and safety training (if required); and
- d) addressing any other incidents that have been brought to their attention.

The Company's Safety Officers will keep the Executive Committee informed of any accidents, issues and other incidents relating to health and safety that have been brought to their attention as necessary.

1.8 *Building Manager*

The Building Manager, currently GPE Management, has overall responsibility for health and safety in common areas of the building and the external structure of the building. The Building Manager completes annual risk assessments in relation to health and safety, fire and water for the common areas of the building.

1.9 *Employee's Duties*

The present legislation stresses that all individuals at every level must accept responsibility for health and safety matters. It is the duty of every employee to:

- (a) take reasonable care for their own health and safety and that of other persons (including other employees, directors, consultants, contractors, suppliers and workmen) who may be affected by his or her acts or omissions at work;
- (b) co-operate with the Company to enable:
 - (i) the successful implementation of this policy; and

- (ii) the Company's compliance with the obligations imposed under the relevant statutory provisions;
- (c) comply with all safety instructions and directions issued by the Company;
- (d) report and co-operate in the investigation of all accidents or incidents that have led or may lead to injury;
- (e) use equipment provided in accordance with training received; and
- (f) report any potential risk or hazard or malfunction to the appropriate person.

1.10 *Building Contractors*

- (a) All building contractors working at the Company's premises should be familiar with relevant health, safety and environment policies and standards. The maintenance contractor for the building is responsible for ensuring that its employees are familiar with and adhere to health and safety standards in order to prevent hazards to themselves, other occupants, or the general public. All building contractors must provide competent staff to carry out the work on behalf of the Company, and training certificates and competency statements should be provided if required.
- (b) If the building contractor employs other contactors (sub-contractors) to undertake work on their behalf, it is the contractor's responsibility to ensure the sub-contactors are sufficiently competent to undertake the assigned work and that they adhere to all health and safety policies and standards.

1.11 Any failure by an employee to comply with any aspect of the Company's health and safety procedures, rules or duties specifically assigned to the employee with regard to health and safety may be regarded by the Company as misconduct which will be dealt with under the terms of the Company's Disciplinary Policy.

1.12 The allocation of duties for safety matters and the particular arrangements which have been made to implement the policy are set out below.

1.13 The policy will be kept up to date, updated in line with relevant guidance and particularly as the business changes in nature and size. To ensure this, the policy and the way in which it is operated will be reviewed on a regular basis, and at a minimum annually, and any revisions will be notified to employees.

2. Organisation and Arrangements

2.1 *Company's Health and Safety Obligations*

The Company's health and safety obligations with respect to its tenancy are set out in Annex 1 to this policy. The checklist will be reviewed annually to ensure the Company's compliance with its health and safety obligations.

2.2 *Emergency Procedures*

- (a) All employees have the responsibility to ensure that all fire exits are kept free from obstruction at all times. Packaging and paper in particular should not be kept near the exits since these are potential fire hazards.

- (b) Fire evacuation procedures are detailed on the Fire Evacuation Emergency Plan notice displayed in the office common areas and the fire safety notices displayed in the building's common areas. It is the responsibility of all employees to become familiar with these. In particular, they must be aware of their nearest fire exits, the location of fire alarms and extinguishers and their allocated assembly point.
- (c) If the fire alarm is heard, leave the building immediately by the nearest available fire escape route and calmly walk to the fire assembly point shown on the fire safety notices. Do not stop to collect belongings and do not use the lifts. If you have visitors or contractors with you, instruct them to follow you. Do not re-enter the building for any reason until instructed to do so.
- (d) If an employee discovers a fire, they should operate the nearest fire alarm call point. The fire alarm will sound an evacuation throughout the building. They should call the emergency services on 999 immediately. The employee should not put themselves at risk and should only use the firefighting equipment provided to enable evacuation if they have been trained to do so. They should leave the building by the nearest available exit and proceed to the assembly point and await further instructions.
- (e) Disabled persons should be escorted from the property to the relevant place of safety by their assistant or 'buddy'. Once outside the building, the disabled person or their assistant or 'buddy' must report their presence to the person in charge of the evacuation.
- (f) Nominated individuals will be trained in the correct use of fire extinguishers. Fire extinguishers are in appropriate locations in the Company's office. The extinguishers in the common areas of the building are maintained by the Building Manager and are tested at least every 12 months. Any faults should be reported to the Safety Officers.
- (g) Employees should notify their line manager if there is anything (for example, impaired mobility) that might impede their evacuation in the event of a fire and appropriate provisions will be made to assist them in the event of an evacuation.
- (h) The Building Manager conducts fire drills at least every 6 months, which must be taken seriously.
- (i) The Company is responsible for ensuring fire risk assessments are undertaken and implemented for the office. The Building Manager is responsible for conducting maintenance and regular checks of fire extinguishers, fire alarms, escape routes and emergency lighting. The Building Manager is also responsible for ensuring that all escape routes are clear as part of daily building patrols.
- (j) The Building Manager is responsible for communicating any updates with regards to fire safety and evacuation procedures to the Safety Officers.
- (k) Fire Alarms

The fire alarm is tested on a weekly basis. The alarm buttons are situated in appropriate locations. The Building Manager is responsible for maintenance of the fire alarm system within the Company's demise. However, any fault identified should be reported to the Safety Officers.

2.3 *Non-Emergencies*

If an employee observes a situation or incident which suggests a danger to health or safety such employee should report it to the Safety Officers.

2.4 *Training*

The Company will ensure that all employees are given adequate training and supervision to perform their work competently and safely. Employees will be given all applicable documentation relating to health and safety. All new employees will be given a health and safety induction and be informed of the fire procedures, first-aid facilities, this policy, and out of hours/lone working.

2.5 *First-Aid*

- (a) The workplace environment and the size of the building is considered to present a low risk. The Safety Officers will be provided with relevant first-aid training.
- (b) In accordance with the relevant regulations a first-aid box is maintained at the Company's premises and a notice is posted giving the location of the first-aid box and the name of the person in charge of it.

2.6 *Accident Report Book*

- (a) Any accident or injury, however slight, must be reported to the Safety Officers who will record the incident in the accident book.
- (b) In a case where an employee is injured to the extent that he or she is unable to attend to his or her usual work, a detailed written report must be prepared by the Safety Officers or the individual's line manager and submitted to the Executive Committee.

2.7 *The Reporting of Injuries, Diseases and Dangerous Occurrences*

- (a) The Safety Officers are responsible for investigating any injuries or work-related disease or illness, preparing and keeping accident records, and for submitting reports to the relevant authorities if required under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). The investigation will seek to identify underlying causes of accidents and corrective actions which should be taken to prevent recurrence.
- (b) In recognition of its duties under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) the Company will report accidents, diseases and dangerous occurrences to the Health and Safety Executive, in addition to its statutory duty to keep an accident book.
- (c) Should there be a death or serious injury from an accident in connection with the business of the Company or if there is a dangerous occurrence the Executive Committee must be notified immediately. The Safety Officers will notify the appropriate authority as soon as possible (normally by phone). The appropriate authority is the Local Authority Environmental Health Department.

2.8 *Reporting*

- (a) If anybody is off work for more than three days as a result of an accident at work; or

- (b) if any death, serious injury or dangerous incident has occurred; or
- (c) if a specified occupational disease is certified by a doctor,

a written report must be forwarded to the Executive Committee at the earliest opportunity in order that a special report form can be completed for dispatch to the appropriate authority within seven days of the incident, as required by the relevant regulations, as set out in paragraph 2.7 above.

2.9 *Control of Substances Hazardous to Health Regulations (COSHH)*

The COSHH regulations require the control of hazardous substances in the workplace. The Company will do all that is reasonably possible to avoid the use of substances hazardous to health at work. The Company will conduct a COSHH risk assessment and put in place appropriate measures to comply with the regulations. All employees should be aware of potentially flammable materials being used on Company premises, for example, spirit-based cleaning fluids, toner and floor polishes. If there is any doubt as to the adequacy of such arrangements relating to hazardous substances a report should be made to the Executive Committee.

2.10 *Electricity at Work Regulations*

- (a) The purpose of these regulations is to require precautions to be taken against the risk of death or personal injury from electricity at work.
- (b) The regulations impose responsibilities on all employees in relation to electrical appliances and installations in so far as they relate to matters within their control. It is, therefore, important that employees are aware of the possible dangers from electrical installations and appliances in relation to their work activities in order for them to report any hazards to the Safety Officers at the earliest opportunity.
- (c) Employees should bear in mind, in particular, the following non-exhaustive list to reduce risk of fire:
 - (i) electrical sockets should not be overloaded;
 - (ii) defective plugs/sockets should be reported;
 - (iii) connecting cables should not be repaired by tape; and
 - (iv) any electrical equipment should be unplugged or switched off overnight.

2.11 *Equipment*

- (a) Equipment (including photocopiers, facsimile machines, franking machines and computer equipment) is normally serviced under maintenance agreements with outside contractors. Portable appliance testing (PAT) on equipment is carried out at least every 12 months. However, it is every employee's responsibility to report defects in equipment immediately, particularly if they might be dangerous to health. Please report any faults or malfunctioning of equipment to the Safety Officers. The Safety Officers will hold a list of maintenance contracts. This will enable steps to be taken to rectify the defect and/or "make safe" the equipment at the earliest opportunity.
- (b) Employees must use equipment in accordance with any instructions given. No attempt should ever be made by an employee who has not been properly trained to repair

equipment or adjust the internal workings of any equipment. No employee should touch electrical equipment with wet hands. Equipment should be turned off when no longer necessary. No unauthorised equipment should be used on any premises of the Company. The Safety Officers are responsible for ensuring equipment safety and maintenance.

2.12 *Risk assessments and measures to control risk*

- (a) The Company appoints an external consultant to carry out general workplace risk assessments periodically. The purpose is to assess the risks to health and safety of employees, visitors and other third parties as a result of its activities, and to identify any measures that need to be taken to control those risks.
- (b) Measures will be taken to avoid or reduce the need to lift or carry items which could cause injury (manual handling) and to provide training on manual handling as necessary. If an employee is requested to move heavy items and has not had such training, they should speak to the Safety Officers.
- (c) The Safety Officers are responsible for workplace risk assessments and any measures to control risks.
- (d) If an employee's health condition or impairment is likely to be within scope of the Equality Act 2020, the Company will ensure that a risk assessment is undertaken to identify and implement any reasonable adjustments necessary that will assist them in carrying out their role.

2.13 *Display Screen Equipment Safety*

- (a) The Company recognises the risk posed by working with Visual Display Units (VDUs) and is committed to minimising the harm and injury to the staff by ensuring that workplaces are well designed.
- (b) The Company will carry out analysis and assessment of workstations to reduce risks and arrange eye tests on request for all employees who habitually use VDUs as a significant part of their normal work. Employees will be asked to carry out a display screen equipment self-assessment every two years.

2.14 *Smoking*

Under the terms of the Health Act 2006, employees are not permitted to smoke in the Company building at any time.

2.15 *Legionella management*

- (a) The Company will do all that is reasonably practicable to protect employees, visitors and neighbours from hazards arising from the use and distribution of water services in our property. This will be achieved through full compliance with all statutory requirements of current relevant legislation, British and European standards, codes of practice and guidance notes.
- (b) The domestic water services under the Company's responsibility at Kent House are considered to be of a low risk. The Building Manager is responsible for undertaking annual water and legionella risk assessments and six-monthly water sampling to assess water quality for the water systems present in the common parts. The water immersion heater serving water in the kitchenette will be inspected on annual basis.

2.16 *Lone working*

Employees are advised not to carry out any high risk activities when working 'outside' business core working hours and inform their line-manager of any medical condition that may potentially affect them when working alone. All employees will be informed of the procedures to follow in case of an emergency.

2.17 *National health alerts*

- (a) In the event of an epidemic or pandemic alert the Company will organise its business operations and provide advice on steps to be taken by employees, in accordance with official guidance, to reduce the risk of infection at work as far as possible. Any questions should be referred to the Safety Officers.
- (b) It is important for the health and safety of all employees that everyone complies with instructions issued in these circumstances.

2.18 *Working from Home*

- (a) The Health and Safety at Work Act 1974 applies to home working employees. The Company will work to ensure that usual health and safety provisions are adhered to in all locations. This will include conducting risk assessments of the proposed working environments, where necessary, to comply with legal provisions, such as inspecting the home set-up.
- (b) If an employee's health condition or impairment is likely to be within scope of the Equality Act 2020, their line manager will ensure that a risk assessment is undertaken to identify and implement any reasonable adjustments necessary that will assist them in carrying out their role.
- (c) Homeworking employees are responsible for day-to-day health and safety issues and for reporting any concerns to their line manager. Employees must take reasonable care to ensure that they work in a safe working environment.
- (d) Failure to comply with the health and safety provisions may result in the withdrawal of the homeworking arrangement and disciplinary action.

3. Information and Consultation

The Company is committed to providing such information and instruction as may be necessary to ensure compliance with the relevant legislation and to promote awareness and understanding of health and safety throughout the workforce. The Company will consult with employees on significant matters relating to health and safety at work.

4. Insurance

In further recognition of its statutory and common law duties, the Company has taken out insurance with an approved insurer against liability for death, injury and/or disease suffered by any of its employees and arising out of, or in the course of, employment by the Company provided only that it was caused by the negligence and/or breach of statutory duty on the part of the Company.

5. General Housekeeping

It is each employee's responsibility to ensure that their areas are kept safe at all times. General guidelines include:

- (a) a general level of cleanliness should be maintained at all times;
- (b) waste should be disposed of in the bins provided;
- (c) items must be stored away or stacked on shelves etc and this should be done in a safe manner ensuring that drawers are kept closed and wires are not left trailing;
- (d) gangways and exits should be well lit and kept clear of obstructions;
- (e) employees should avoid undue hurrying particularly downstairs and handrails should be used;
- (f) employees should never read whilst walking;
- (g) any spilled drinks should be cleared up immediately;
- (h) pointed objects such as pencils, letter openers and scissors must be used carefully to avoid puncture wounds;
- (i) electrical sockets should not be overloaded;
- (j) defective plugs/sockets should be reported;
- (k) connecting cables should not be repaired by tape;
- (l) any electrical equipment should be unplugged or switched off overnight; and
- (m) no items should be obtained beyond reach unless a stepping stool or ladder in a safe condition can be used.

6. Conclusion

6.1 Responsibility for health and safety arises at all levels. On a personal basis, every employee is responsible for their own and others' safety at all times. Overall responsibility rests with the Company. Should any guidance be needed on matters relating to health and safety, employees should consult with the Safety Officers.

6.2 This Policy Statement is issued in compliance with Section 2(3) of the Health and Safety at Work etc. Act 1974 and binds all directors and employees.

Annex 1

Company responsibilities within the demise:

- Cleaning
- Cleaning the internal face of all windows and doors within the demise
- Pest control
- Waste disposal on street
- Fire risk assessment
- Maintenance of fire doors including magnetic locks
- Maintenance of lighting and testing of emergency lighting
- Maintenance of additional installed air conditioning units (i.e., within comms rooms)
- Fire signage
- Provision and maintenance of fire extinguishers
- Provision of fire wardens
- Personal emergency evacuation plan (PEEP) for disabled employees or visitors
- Provision of first aiders
- Water hygiene risk assessment
- Portable appliance testing (PAT)
- Inspection and testing of fixed wiring and electrical installations in accordance with relevant regulations
- Security and access control systems
- Insurance of the occupier's contents, fixtures and fittings
- Payment for electricity usage within the demise
- Provision of hot water to kitchenette
- Control of substances hazardous to health (COSHH)
- Arranging statutory inspections, as necessary, of any occupier plant or equipment