



START SAFE – WORK SAFE – FINISH SAFE



AquaGib

Committed to your life source

AquaGib Ltd Health and Safety Policy



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1.0 Purpose

This policy is to define AquaGib Ltd.'s (AGL) commitment, responsibilities and approach for the management of health and safety. It confirms its intent to ensure all sectors of the company are aware of the direction, primarily to ensure a safer workforce.

2.0 Policy

This policy is implemented via a consultation process with all relevant stakeholders and is approved by the Managing Director (MD), Board of Directors, the Senior Management Team (SMT) and annually reviewed by the Health and Safety Manager. Compliance with the requirements of this document is mandatory for all departments and employees and any non-compliance of the Health and Safety policy and/or health and safety procedures will be treated with serious concern.

HEALTH, SAFETY AND ENVIRONMENT POLICY STATEMENT

At AquaGib we acknowledge the significance of the health, safety and wellbeing of our employees, contractors, suppliers, customers and communities. We are committed on having high quality Health & Safety (H&S) standards in all areas of our business.

We are always focused on continual improvement when it comes to health and safety, ensuring we have a dedicated safety management system that exceeds the expected standards. As Managing Director, I am committed to ensuring that this programme will help to position health and safety as one of our top business priorities, building a strong culture for continual improvement in the removal, reduction and control of risk to people, property and the environment.

Together we will continue focusing on enhancing our H&S system to acquire a positive health and safety culture throughout the business and by working as a team to achieve:

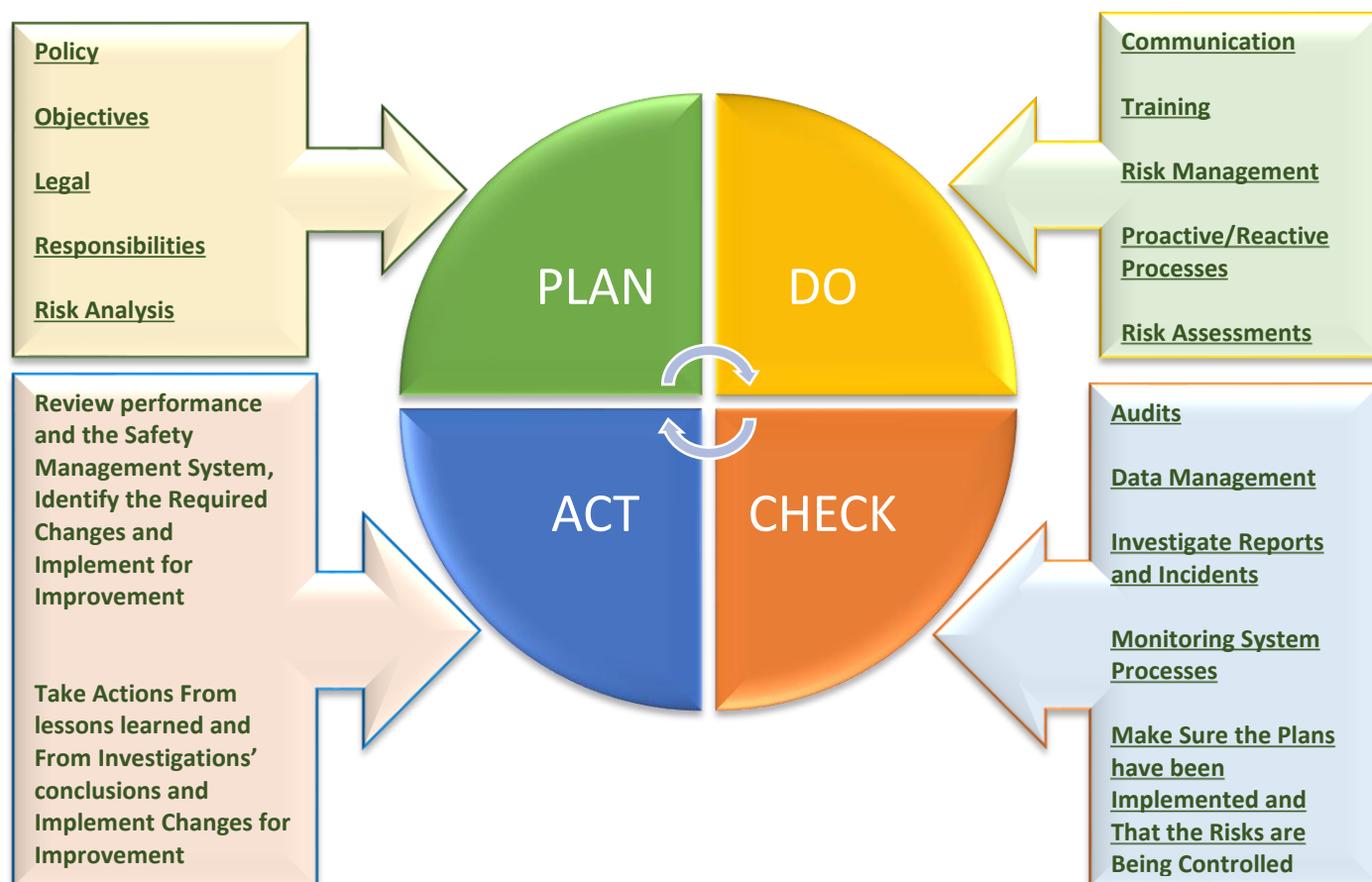
- Appropriate training systems and effective communicative structures on health and safety.
- The establishments of appropriate systems to improve health and safety performance and risk management to adopt a proactive approach.
- And ensure significant risks in the workplace are assessed, controlled and managed to minimise the likelihood of harm to employees and anyone affected by AGL's activities.
- And ensure health and safety features importantly in meeting agendas throughout the organisation and the relevant information is transmitted to the Senior Management Team and the Board.
- And ensure collaboration so that management and workforce continue to work together to guarantee workforce safety, compliance with statutory requirements, continually improve performance, take ownership of health and safety issues and achieve best practice for the benefit of all stakeholders.
- Effective working partnerships with contractors to ensure outsourced works comply with statutory health and safety requirements and provide a healthy and safe environment.

Paul Singleton
Managing Director
2025

3.0 H&S Policy Implementation

AGL pursues an effective management system with an identified structure that provides an effective route to ensure our objectives are met. The context of the structure is shown in figure 3.1 with the Plan-Do-Check-Act (PDCA) approach.

FIGURE 3.1



4.0 Objectives

AGL's objectives are clear and primarily the main focus of the organisation is to ensure the safety of the workforce, contractors, suppliers, customers and communities by enhancing the current health and safety culture, but to ascertain this, our drive is to have an effective program in place that facilitates an efficient consultation process, and by the aid of all levels of employees within the organisation.

5.0 Legal

This policy is designed to meet legal requirements, the Health and Safety Manager will continuously review AGL's compliance with statutory requirements and will work in-conjunction with the Senior Management Team in case of any required amendment of the safety management system (SMS) to ensure it is compatible with its legal obligations.

6.0 Control and Competence

It is recognised that responsibility for the control of H&S at work comes under those in charge with running the business. Since ultimate responsibility of this policy and for directing all health and safety matters rests with the Managing Director (MD) and board of Directors, the daily responsibility for discharging it devolves through Management teams (Senior Management, Superintendents and Supervisors). To assist in achieving the objectives and to efficiently deliver our responsibilities, a competent person is appointed as the H&S Manager; in this case AGL's Senior Manager of the Finance & Business Support department is the appointed person. Furthermore, where necessary, advice is sought from external consultants to facilitate on achieving the business' objectives.

7.0 Responsibilities

It shall be the duty of the business to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees. Employees are also responsible to take care of themselves and of others who may be affected by their acts or omissions at work. Employees' duty also entails to co-operate with the business so far as is necessary to enable the business to comply with all health and safety and statutory requirements.

7.1 Board

- a) Ensure the company's H&S commitment is adhered;
- b) Communicate with the Managing Director to acquire the relevant information on health, safety and environmental matters;
- c) Ensure that responsibilities for reporting H&S matters to the Board are clearly defined;
- d) Ensure quantitative information is analysed;
- e) Ensure that full consideration is given to H&S risks in all business decisions;
- f) Ensure that H&S arrangements are adequately resourced;
- g) Ensure that H&S policy, performance and risks are formally reviewed annually;
- h) Ensure that an effective H&S consultation process is in place;
- i) Annually review the performance of the SMT regarding its contribution to H&S performance;
- j) Endorse Senior Management Team's H&S strategies.

7.2 Health and Safety Manager

- a) Demonstrate commitment to H&S by promoting a strong and positive H&S culture and give clear direction to the Board and Senior Management Team to achieve improvement in H&S culture, climate and performance;
- b) Ensure adequate resources for competent H&S advice and support throughout the business, maintaining professional H&S competence through the Institution of Occupational Safety and Health Continual Professional Development (IOSH CPD);

START SAFE – WORK SAFE – FINISH SAFE

- c) Develop, plan and deliver a programme of H&S inspections of assets and audits of H&S Management manual procedures, and identify constructive resolutions to issues identified through inspections, audits, and assessments;
- d) Provide assistance to managers and supervisors to ensure that any hazards and risks from Company operations are properly identified, assessed and controlled, and H&S is sufficiently considered in local business plans;
- e) Develop and facilitate the implementation of the H&S policy, management and supporting standards to meet legislative requirements and H&S strategy;
- f) Review applicability of H&S procedures in case of new or changing legislation;
- g) Communicate any new or changed H&S procedures to the business;
- h) Support the Human Resources Manager to ensure the H&S training requirements of employees are correctly identified to meet legislative requirements;
- i) Review H&S training on a regular basis to ensure it reflects the requirements of H&S procedures;
- j) Support the design and delivery of H&S training courses, as required;
- k) Facilitate effective risk management and produce constructive internal and external H&S reports to assist monitoring and review of safety risks, performance and management system effectiveness;
- l) Liaise with H&S enforcement authorities and maintain dialogue with organisations and associations with shared interest in the H&S arena;
- m) Ensure company complies with H&S legislation requirements;
- n) Develop comprehensive, practical H&S procedures which comply with all applicable H&S legislation and best practice;
- o) Develop, support and maintain an effective consultation process and effective methods and processes for communication of H&S to all employees;
- p) Inform relevant Senior Managers and Directors immediately of significant / reportable accidents and incidents review within their area of responsibility;
- q) Deliver a programme of Toolbox Talks to employees, appropriate to risk;
- r) Investigate accidents/incidents and subsequently advise on remedial measures following such events and collate the information to provide significant learning points;
- s) Provide thorough information to the business regarding its H&S performance and comparative indicators;
- t) Support all Directorates to achieve Company targets and objectives.

7.3 Senior Management Team

- a) Accountable to the Managing Director on implementations required affecting the H&S management system;
- b) Lead by example on H&S and demonstrate commitment by not cutting corners;
- c) Ensuring decision making on strategic planning as a result of advice from the Health and Safety Manager and consultants;
- d) Adhere to statutory requirements;
- e) Ensure that adequate resources are made available for the provision of a safe and healthy working environment, including sufficient tools and equipment;
- f) Collaborate on the reviews of accidents and incidents;
- g) Ascertain that the reporting of accidents and incidents processes is followed;
- h) Motivate staff & engage with the workforce to solve H&S problems;
- i) Agree and support the implementations of new H&S risk management strategies;
- j) Commit and communicate that continual improvement on health and safety is our objective;
- k) Monitor the respective department's H&S practices to ensure it is operated in accordance with the agreed H&S directions of the organisation;
- l) Ensure H&S is in the agenda for all Senior Management Team meetings;
- m) Work in partnership with the Health and Safety Manager and consultants on the implementations and updating of the H&S policies;
- n) Work in partnership with the Health and Safety Manager and consultants on the implementations and updating of the H&S management systems;

START SAFE – WORK SAFE – FINISH SAFE

- o) Work in partnership with the Health and Safety Manager and consultants on operational requirements to acquire Health and Safety support and to ensure that H&S is not viewed as a separate function, but as an integral part of productivity, competitiveness and profitability;
- p) Provide clearly defined lines of responsibility for implementing, monitoring, auditing and reviewing the H&S policy and management system. Ensure this is regularly updated to reflect change;
- q) Ensure that systems and resources are in place to effectively manage the safety of assets from design to disposal;
- r) Agree and endorse long term H&S strategy;
- s) Ensure that appropriate training is provided for employees and their H&S representatives meet legislative requirements;
- t) Provide a structure for effective management / employee consultation and lead and participate in management / employee consultation;
- u) Review all reportable and significant accidents and incidents;
- v) Regularly appraise Managers regarding their contribution to H&S performance using pro-active & reactive measures;
- w) Carry out safety tours in line with an agreed programme to ensure visibility to the workforce;
- x) Ensure that H&S performance is reported to the Board;
- y) Motivate the staff & engage with the workforce to solve H&S problems;
- z) Ensure sufficient funds and resources are provided for required welfare facilities, equipment, training, supervision, employees and maintenance to ensure safe places of work;
- aa) Attend required H&S training to aid in ensuring a healthy workforce and a safe environment;
- bb) Collaborate and agree on new risk management strategies.
- cc) Ensure contractors are contracted in full consideration of our H&S obligations, to comply with statutory requirements and to ensure safety;
- dd) Report details of accidents and incidents that are notifiable under legislation to the appropriate authorities;
- ee) Report to the Health and Safety Manager regarding completion of and progress towards recommendations from audits, inspections and investigations;
- ff) Communicate H&S Alerts to all employees upon receipt from H&S Manager;
- gg) Ensure there is a supervision process when subcontracting.

7.4 Superintendents/Supervisors

- a) Demonstrate commitment to H&S by leading by example and not cutting corners;
- b) Ensure that relevant H&S procedures are followed by employees and that appropriate records are available e.g. records of maintenance and testing and records of pre-user checks of appropriate plant and equipment;
- c) Ensure that risk assessments are up to date, including adequate and implemented control measures. Communicate appropriate risk assessments;
- d) Support Senior Management to implement local H&S plans and achieve continual H&S improvements;
- e) Action and ensure closure of recommendations from audits, inspections, assessments and investigations are adhered;
- f) Appraise employees' H&S performance e.g. adherence to appropriate H&S procedures, implementation of control measures from risk assessments, raising of H&S issues and provision of feedback from H&S training;
- g) Report to Senior Management and Health and Safety Manager regarding completion of and progress towards recommendations from audits, inspections and investigations;
- h) Ensure that visitors to Company premises, including members of the general public who are in close proximity to Company operations, are not exposed to risks to their H&S as result of our activities;
- i) Ensure that visitors and contractors are inducted to site as appropriate, and that new starters receive local H&S induction.
- j) Challenge and report unsafe behaviour;
- k) Discuss H&S with employees and encourage staff to raise all H&S concerns & issues;
- l) Appropriately allocate time to provide support and supervision relevant to H&S risk, ability and competence;

START SAFE – WORK SAFE – FINISH SAFE

- m) Carry out safety audits appropriate to risk;
- n) Give employees positive personal, specific and timely feedback regarding H&S issues and concerns raised and action taken;
- o) Deliver a programme of Toolbox Talks to employees, appropriate to risk;
- p) Communicate H&S Alerts to all employees upon receipt from H&S Manager and/or any other SMT member;
- q) Ensure employees report all accidents, incidents and issues on the working day or shift of occurrence and support them to find solutions to problems;
- r) Report accidents and incidents via the available procedure within 7 days of occurrence if no lost time, if lost time, on day of occurrence or first absence.
- s) Collaborate on accident/incident investigations, identifying underlying causes including human factors as well as underlying management-related causes without attributing blame and make practical recommendations to prevent reoccurrence.
- t) Review and respond to relevant H&S documentation issued as part of consultation.

7.5 All Employees

- a) Demonstrate commitment to H&S by leading by example and not cutting corners;
- b) Co-operate with management and colleagues to ensure the Company complies with its obligations under H&S legislation;
- c) Follow H&S procedures, including pre-user checks of equipment and emergency exercises;
- d) Correctly use all protection devices, systems and all required PPE;
- e) Co-operate in health screening and surveillance procedures, as needed by the Company, to include the obligation to attend medical health, safety occupational or other relevant assessments as may be required by the Company;
- f) Take reasonable care for the H&S of themselves and anyone else who may be affected by their work activities;
- g) Ensure that fellow employees, contractors and visitors follow site H&S procedures. Challenge and report unsafe behaviour to your direct Line Manager or Health and Safety Manager;
- h) Attend H&S training and provide feedback on its effectiveness;
- i) Report all H&S issues and any matters of concern regarding H&S that arise in connection with workplaces, equipment or activity by following the H&S reporting procedure in conjunction with direct Line Management and the Health and Safety Manager;
- j) Collaborate by suggesting areas for improvement on H&S to direct Line Managers or the Health and Safety Manager etc.
- k) Be attentive and conscious to all appropriate H&S communications facilitated via, meetings, Toolbox Talks, H&S Representatives, Notice Boards, Newsletters and Briefings etc;
- l) Report all accidents and incidents including near misses to management immediately;
- m) Carry out dynamic risk assessments as appropriate, before commencing work activity. Implement measures to ensure risk is removed or adequately controlled and if not comfortable with the situation request support from Management or the Health and Safety Manager;

8.0 Risk Analysis

The Health and Safety Manager conducts a Risk Review of the organisation, this exercise assesses the respective activities, which enables to measure the level of risk exposure from each department within the organisation, to enable an effective and accurate holistic representation of the level of risks throughout the organisation, in order to implement an effective Risk Management System.

9.0 Communication

The company is committed to a consistent and effective communication system for Health and Safety. This is relayed through our departmental meetings in which Health and Safety is an integral part of all meetings'



START SAFE – WORK SAFE – FINISH SAFE

agendas, including the SMT Operations Meetings. Communication on Health and Safety will also be captured via the Health and Safety Committee, including the provision of, Presentations, Toolbox Talks, Mobile Work Site Inspections, Site Inspections, Directors Safety Tours and Senior Management Safety Tours. All these practices allow and generates the chance for communication, commitment, to listen to concerns and to conclude on required improvements to ensure continual Health and Safety improvement for the organisation.

10.0 Training

All employees, middle management and senior management are provided with sufficient training to ensure they have the necessary skills to carry out their full range of duties and act with proper regard for the H&S of themselves and others who might be affected by their work activities. The training programme is managed by the Health and Safety Manager in-conjunction with the SMT and when necessary, in consultation with the company's appointed health and safety advisors.

11.0 Risk Management

Post to the risk analysis, the company ensures to apply appropriate measures as a risk management approach, to control the risks and hazards identified in our risk analysis. This includes the required respective risks assessments within the safety management system and the monitoring applications which are continuously implemented e.g. Mobile Work Site Inspections, Site Inspections, Senior Management Safety Tours and Directors Safety Tours etc. These practices ensure to apply a continual effective risk management system and ensures a proactive/reactive approach to identify, analyse, reduce and control the hazards and risks reflecting from our required operations.

12.0 Risk Assessments – Safe System of Work

Risk assessment is key to all aspects of the Company's H&S management. Any significant risks to AGL employees, visitors, contractors or members of the public are initially evaluated by the Health and Safety Manager. A risk-management approach is taken following consideration of potential exposure to risks.

AGL employees are trained in a process of on-the-job hazard identification and risk assessment. Tasks as well as locations are identified and risk assessments and safe systems of work of the identified hazards and practices are conducted, recorded and communicated as appropriate.

Aside from general risks, certain hazard categories are recognised and are subject to specific risk control systems defined. These categories are as follows:

Hazard Identification and Risk Assessment

- Rock fall
- Workplaces
- Work Practices
- Manual Handling
- COSHH
- DSE
- Noise
- Vibration
- Fire
- First Aid
- Legionella
- Environmental

Safe Systems of Work



START SAFE – WORK SAFE – FINISH SAFE

Isolation of Equipment
Lifting Equipment and Lifting Operations
Operation of Vehicles
Working in Confined Spaces
Working on Near Open Water
Working at Heights - Use of Ladders & Use of Ropes
Excavations and Underground Services
Working with Chemicals
Working in the Highway
Working in Excavations
Electrical Safety
Legionella
Asbestos Cement Pipes
Exposure to sewage and sharps
Manual Handling

13.0 Safe Working Environment, Plant and Equipment

The Company strives to ensure that all employees operate in a healthy and safe working environment using safe plant and equipment through provision of: -

- Suitable, safe, access and egress to and from each working area which takes account of the condition of floors and walkways, segregation of pedestrian and vehicle traffic and levels of lighting;
- Appropriate methods of providing heating and ventilation or recourse to such a provision where the work is substantially outside;
- Well maintained clean and tidy floors and passageways;
- Adequate welfare facilities;
- Sound structures and materials of construction.

An effective system is in place for the design of operational facilities, plants, equipment and processes, in accordance with relevant engineering guidelines, codes of practice and statutory requirements.

All items of machinery, plant and equipment used are subject to an appropriate level of examination, testing and maintenance to enable them, when used correctly, to be safe and without risk. All such items purchased are to recognised standards as laid down by current legislation.

In fixed work locations all fire precautions, firefighting equipment and means of escape in case of fire are provided following a risk assessment in line with the requirements.

Whilst the use of personal protective equipment is acknowledged as being the least favoured option in the hierarchy of controls, there are situations where reliance on its use cannot be avoided. All protective clothing and equipment deemed necessary as a result of risk assessment is to a standard that complies with current legislation and has been properly assessed as suitable for the work by a group representing, H&S and Procurement section. These assessments take account the range of user characteristics when deciding upon the range.

14.0 Management of Contractors

AGL is to ensure the contracted companies are competent enough to carry out the required works. The contracted companies need to follow a risk assessment protocol, by following AGL's risk assessments, health and safety procedures and by providing risk assessments to AGL in relation to all their work activities requested by AGL. The risk assessments provided by the contracted companies require to be approved by middle management and/or the SMT/Health and Safety Manager. A supervision process of the works carried out by the contracted companies needs to be implemented when subcontracting.

15.0 Monitoring

AGL is firmly committed to adopt all measures possible to avoid accidents and is committed on leading an effective proactive/reactive system. AGL implements the following measures to ensure a safer working environment through a monitoring process:

Proactive

- Risk Assessments
- Mobile Work Site Inspections
- Site Inspections
- Line Managers Health and Safety Checklists
- Directors Safety Tours
- SMT Safety Tours
- Health Surveillance
- Unsafe Condition Reports
- H&S in Meeting agendas
- Committees

Reactive

Whilst it remains the company's priority to avoid personal injury, cases of work-related ill health and incidents resulting in damage to property, it is recognised that they can occur and that it is essential to learn as much as possible from any such event. Therefore, Accident and Incident Reporting plays a major part in adopting an efficient reactive approach, to ensure as much as possible that the chance of reoccurrence is minimised. However, Accident and Incident Reporting allows the opportunity to engage on proactive actions too. Nevertheless, the following measures are paramount as a reactive approach:

- Accident/incident/ill-health statistics
- Unsafe Condition Reports, which includes near miss reporting
- Accident/Incident Investigations
- H&S in Meeting agendas
- Committees

16.0 SMS Review

The Health and Safety Manager is responsible to carry out an annual audit of the Safety Management System, to ensure all necessary areas are covered in compliance with statutory requirements and to aid on identifying required changes and implementations for improvement.

As a monitoring process, statistics of reporting and injuries are analysed by the Health and Safety Manager in – conjunction with the SMT and conclusions of the analyses are relayed to Middle Management and the employees, with statements of required improvements and required commitments to ensure continual effective safety management system and to enable an effective proactive/reactive approach. The analysis also considers the areas the SMS is not capturing, if any, and this identification is then considered for improvement.

All incident reports are investigated by the Health and Safety Manager, which he then involves all relevant parties e.g. employee, direct management and the SMT. These investigations are always reviewed as a



START SAFE – WORK SAFE – FINISH SAFE

monitoring process, ensuring an effective reactive approach to avoid reoccurrence and for health and safety improvement.

The plan for risk management is reviewed by the Health and Safety Manager, in-conjunction with the SMT and Middle Management to ensure all risks are controlled and the SMS is reviewed annually as a whole to identify any potential voids that require an assessment for improvement and implementation.

17.0 Alcohol and Drugs

It is recognised that abuse of alcohol, drugs, solvents etc., can pose a risk to all people in the workplace and managers and supervisors within the Company will remain alert to this risk and take the necessary action to ensure the safety of the individual and of others. Consequently, we will also ensure that any employee involved is helped, whilst not compromising the H&S of fellow employees, contractors, customers and visitors.

18.0 Stress

The HR Manager and Health and safety Manager administer the stress management approach for AGL's employees. Direct line managers are always approachable to ensure initial support is provided to any employee suffering from stress related issues. The company also provides training in mental health first aid and on wellbeing leader training which aids on support for our employees and to ensure an established wellbeing program is functional and effective.

19.0 Improvement

As a result of the review of the system, the health and Safety Manager carries out an exercise which provides information of areas for improvement and this is discussed at SMT level to agree on potential alterations and implementations to the SMS, that would improve the system and the level of health and safety of the company. When necessary, this is also discussed with NWG's Health and Safety advisors.

20.0 Policy Review

The H&S policy will be annually reviewed or more frequently in the case of significant change regarding the nature or scope of H&S risk within the business. All revisions will be ratified by the SMT and board of directors and relayed to all company employees where appropriate.

START SAFE – WORK SAFE – FINISH SAFE