



HEALTH & SAFETY AT WORK POLICY - PART 1

We, VINCI Construction UK Ltd, are fully committed to a process of demonstrable, continuous improvement in pursuit of health and safety excellence. This complements VINCI's core values which include transparency, integrity and respect for people. Our principal goal is to prevent all injury or ill health amongst our employees, those who work with us, and members of the public.

It is therefore our intention that the operations of all Group Companies and their Divisions are executed at all times in such a manner as to protect the health and safety of any person. This commitment includes the prevention of injury and ill health by monitoring and improving the safety management arrangements and culture of the Company. To achieve the standards to which we aspire, we require all those working for VINCI to adopt the behaviours and leadership necessary to drive the highest standards of health and safety of those around them.. The Directors and Managers of the company must at all times demonstrate proactive and conspicuous leadership with regard to health and safety.

In order to make this a reality, each Company and Division within VINCI Construction UK Ltd will adopt a management system that complies with current legislation and with the requirements of BS OHSAS 18001:2007.

Both the management system and its implementation will reflect, as a minimum, compliance with relevant legislation; industry best practice and contract conditions. Directors are accountable for compliance with Minimum Safety Standards and other HSE policies, and all Directors targets will include health and safety KPIs. Performance against these targets will be considered when awarding any incentives or rewards. As an important part of this process the Directors of each Company and, as appropriate, Division will establish an organisation, reflecting the management structure of the business, with responsibilities for controlling all aspects of health, safety and the protection of the environment. They will also set and monitor appropriate objectives which relate to areas of the business that require improvement Directors are responsible for the provision of appropriate training to those working for them to enable them to carry out their responsibilities.

Minimum Safety Standard 14 describes the risk management arrangements which each Company and, as appropriate Division, will adopt to enable the work, undertaken by its employees and subcontractors, to be planned, communicated, and carried out safely.

All sections of the Policy and the additional supporting documents in the form of "Minimum Safety Standards", "Rail Procedures" and the Construction Safety Manual are available on the Group's intranet systems.

VINCI Construction UK Ltd recognises that workforce involvement in health and safety matters is essential. As a business we support formal and informal workforce involvement approaches, and when appropriate will work with Trade Union Representatives to improve the engagement of our workforce on health and safety issues.

Appropriate sections, in particular Part 2, shall be explained to members of the management team to enable them to understand their responsibilities clearly. In addition, Part 1, this Policy Statement, will be made available to members of the public via VINCI Construction UK Ltd's web site and on request from the head offices at Watford.

This document will be revised to take account of any new work situations and their associated hazards or improved methods of control as well as changes in the organisational structure of the Company concerned. These alterations will be brought to the attention of persons affected by the changes.

VINCI Construction UK Ltd is an active member of Build UK and supports the health and safety commitments made by Build UK.

Health and Safety excellence will not be achieved unless everyone in the Group has a positive attitude, which includes seeking out best practice, intolerance of poor performance or failure to comply with company procedures, and a preparedness to take action to ensure consistently high standards.

I, and my colleagues at VINCI Construction UK Ltd, will play our part in this process and we expect you to demonstrate vigilance and leadership on a daily basis to help deliver the objectives of this policy.



Bruno Dupety
Chief Executive
VINCI Construction UK Ltd



REAL SUCCESS IS THE SUCCESS YOU SHARE



VINCI CONSTRUCTION UK LTD HSE POLICY - PART 2 PRINCIPAL, HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT ARRANGEMENTS

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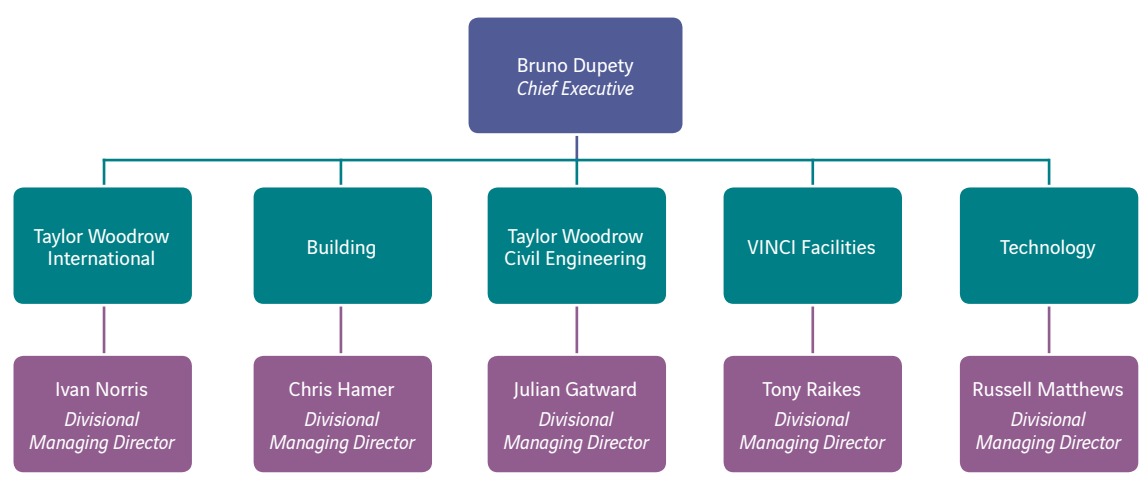
HSE Management Principles

Our management systems are designed to achieve the right balance of operational accountability, consistent standards to control established risks and legal compliance, and a systematic approach to risk management. To make sure that as a business we fully understand the risks that our work presents in each individual case, our HSE management system (as set out in this document) avoids a prescriptive approach to control.

Working within an exhaustive control framework can be counterproductive as the emphasis becomes compliance rather than safety leadership. Differentiating between routine risk and that which is particular or high consequence to a specific location or process is essential to delivering our work without injury or harm to the environment. We have designed our management system so that as a business we can recognise what will cause damage, plan, and then deploy to eliminate and reduce that risk.

Structure and Scope of Operations

This document sets out the common management arrangements for HSE that are applied across all divisions which are structured as illustrated below:

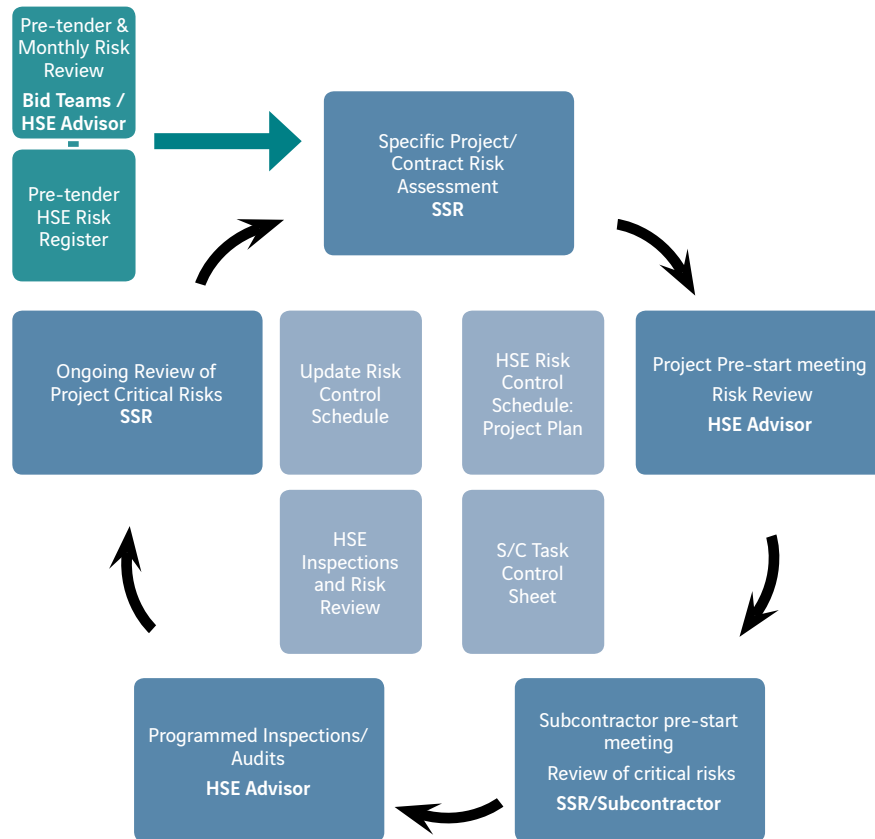


Review and Planning

HSE governance

We are required to manage a diverse range of HSE risks on a contract by contract basis, as a large construction and facilities management organisation. We strive for the highest management standards regardless of contract value, location, or employment status of those delivering work on behalf of the company. We do this through robust risk management. Risk management is the basis of how we plan and prioritise improvements in HSE at a company and contract level.

Ongoing review and planning for improvement is based around an annual cycle of HSE review meetings as illustrated below.



Director's monthly meeting

This meeting is chaired by the VCUK Chief Executive, on a monthly basis, and is attended by the divisional Managing Directors (except Taylor Woodrow International) and Financial, Human Resources and HSE Directors. The meeting has the following terms of reference:

- The meeting is the authorising authority for all significant changes to HSE policies, strategies, and procedures
- Review of HSE performance is a standing agenda item
- The VCUK Chief Executive will chair the meeting, prepare the agenda and papers, and arrange a meeting secretary
- At the final meeting each year, members consider a paper reviewing the HSE risk profile of the business and proposing objectives and targets for the forthcoming year designed to reduce those risks to the lowest level practicable

Divisional HSE reviews

Divisional HSE reviews take place every six months, and have the following terms of reference:

- Meet no less than twice a year
- The second review meeting must take place in October and a HSE Report, then produced for the Director of HSEQ
- The divisional Managing Directors must attend or, on an exceptional basis, may nominate a delegate to attend on their behalf
- Divisional HSE performance review will be a standing agenda item
- A member of the HSE Team will attend every meeting
- Meeting agenda and minutes will be prepared and circulated to members

HSE Risk Management

The overall risk profile of our operations is subject to formal review by the divisional Managing Directors on an annual basis. The review is carried out at the end of year Director’s monthly meeting. Review findings are carried forward in the form of HSE targets and objectives for the following year.

Performance against HSE targets and objectives is reported in the company Annual Report. Key output documents are:

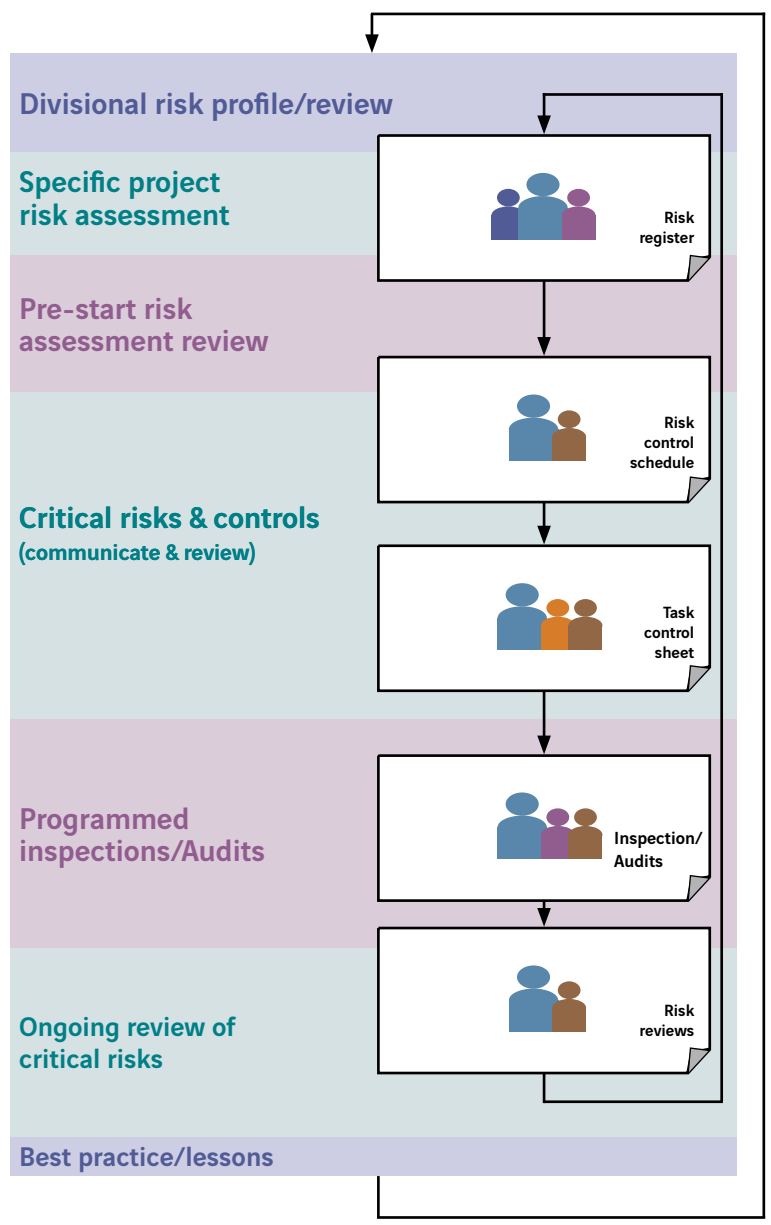
- Annual Risk Review
- HSE Targets and Objectives
- Managing Director’s HSE Review Meeting minutes and agenda
- Divisional HSE Review Meeting minutes and action plans

Minimum Safety Standard 14

Risk management on all projects and contracts is subject to Minimum Safety Standard 14: Risk Management in VINCI Construction UK Ltd.

MSS 14 sets out the mandated activities and documented outcomes that are to be implemented to ensure the effective assessment of risk and implementation of management controls to protect all those who may be harmed as a consequence of the company’s operations.

MSS 14 is the primary mechanism with which we meet our legal obligations under Regulation 3 of the Management of Health and Safety at Work Regulations 1999. Our risk management cycle is illustrated here:



Divisional & Bid teams
 SSR
 HSE Adviser
 Subcontractor
 Contract Manager

Leading and managing for HSE

Strong visible proactive leadership is at the heart of our management culture. All employees of the company are expected to apply this principle in relation to HSE matters at all times.

Core accountabilities

The core accountabilities of those in key leadership positions are set out in this policy.

Divisional Managing Directors will make sure that:

- They provide strong visible proactive leadership including the active challenge and engagement of directors, managers, employees, and suppliers to reinforce the high conduct and standards required by VINCI Construction UK Ltd including compliance with our Minimum Safety and Environmental Standards (MSS & EMS)
- Sufficient resource is made available to enable the HSE policies and related MSS/EMS to be implemented in full. In particular, all competency requirements set out in MSS/EMS for designated activities, and the training requirements set out in MSS 15: HSE Training, must be met in full
- Divisional HSE performance is monitored and subject to regular review, including the delivery of all improvement actions raised as a consequence of any scored inspection, senior management audit, or incident investigation
- Any significant change in the divisional risk profile is brought to the attention of the Managing Director and the Group Director of HSE
- The HSE leadership in their division is subject to routine review, and is formally included in the company's performance review process. The personal conduct of any individual with regard to HSE leadership must be considered in any bonus payment or other incentive paid to any individual
- A divisional HSE performance review is carried out in conjunction with the HSE team at least once a year, and a report generated

Directors will make sure that:

- They provide strong visible proactive leadership, including the active challenge and support of all project and contract teams within their area of responsibility to ensure full compliance with all relevant MSS/EMS
- The significant HSE risks relating to projects and contracts within their area of responsibility are fully understood, and that all contracts are adequately staffed and have a realistic programme
- Any subcontract package agreed allows for the provision of adequate and competent supervision, is fully compliant with this policy and any relevant MSS/EMS, and has identified and agreed safe working practices for any significant risk that arises as a consequence of that work
- They undertake a minimum of six senior management audits each year across projects under their control
- All SSRs are provided with the necessary support and resources to deliver a contract or project without significant harm to individuals or the environment

Group HSE Director will make sure that:

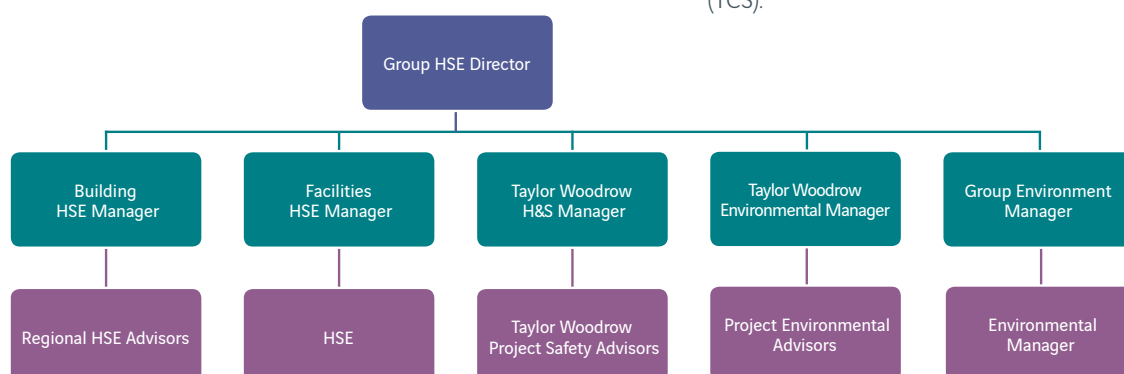
- He/she provides leadership and management of all matters pertaining to HSE across all areas of the business.
- He/she drives the business forward through the development of policy, procedures and operational guidance that will enable an effective process of regulatory compliance, incident prevention, and performance outcomes that protect the companies employees, contractors and reputation.
- He/she will provide and support a dedicated team of HSE advisers to ensure the business has access to specialist HSE support
- An annual programme of HSE audits is agreed and delivered covering minimum of 12 audits per year.

Senior Site Representatives (SSRs) will make sure that:

- They provide strong visible proactive leadership in connection with HSE on the contract or project under their control
- They familiarise themselves with the requirements of all relevant MSS/EMS and ensure that all our HSE requirements relating to their contract or project are fully complied with
- The requirements of MSS 14 Risk Management are fully implemented in relation to their contract or project, and that risk control schedules and task control sheets are reviewed on a regular basis
- They ensure all HSE incidents are reported in a timely manner
- Weekly team inspections are carried out as required by this policy document for their contract or project
- All those working on their project or contract meet the requirements set out in MSS 15 HSE Training

HSE assistance

VINCI Construction UK Ltd have a network of regional and project-based HSE advisers to provide specialist support to operational teams managing projects and contracts. All HSE advisers report to the Group Director for HSE in relation to incident reporting and programmed site scored inspections. The Group HSE Director reports directly to the Chief Executive. The HSE team structure is below:



All employees and those working under our control will make sure that:

- They display and communicate at all times the HSE values and ethos of VINCI Construction UK Ltd
- They stop work regardless of management instruction to proceed if they have grounds for believing that to proceed will put themselves or others at risk of injury, or will cause harm to the environment
- They will challenge any unsafe behaviour that presents a risk to health, safety and the environment whilst at work

Control

Minimum safety and environmental management standards

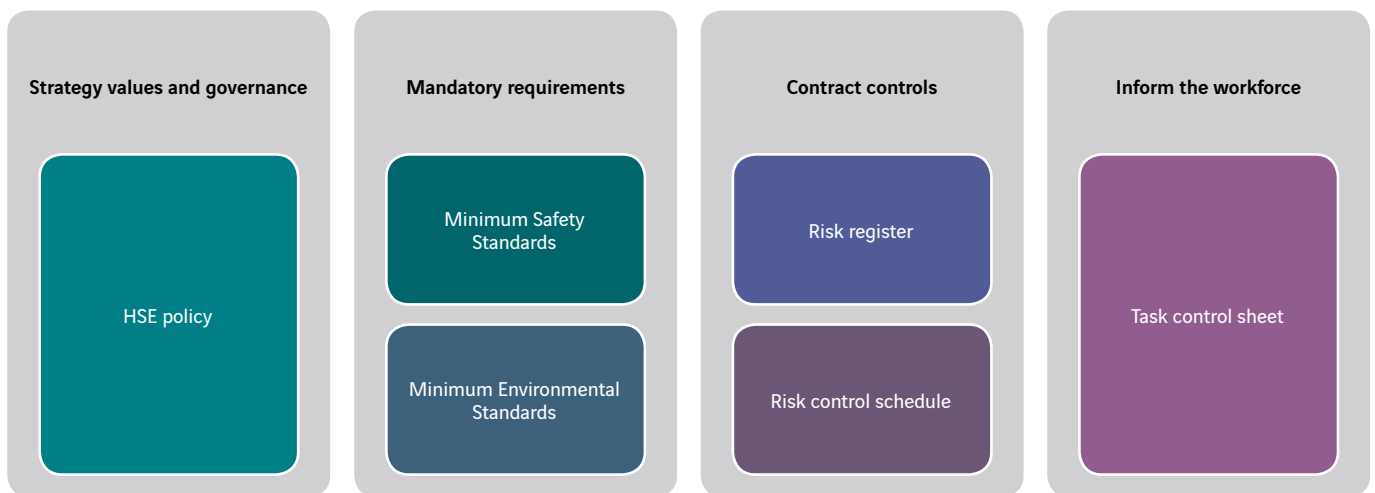
The company maintains a suite of Minimum Safety Standards (MSS) and Environmental Minimum Standards (EMS). These documents mandate certain activities, controls or accountabilities for most known and recurring HSE risks relating to our work. These are subject to regular review and are communicated to the business primarily through the intranet.

Contract and project controls are identified and documented in local risk registers and contract or project risk control schedules. The principal means of HSE communication to the workforce is through the development and briefing of Task Control Sheets (TCS).

Procedures for serious and imminent danger

VINCI Construction UK Ltd have a Disaster and Emergency plan which is available to all staff via the intranet. The plan sets out the actions required when a significant incident occurs and is designed to ensure a systematic response to any incident and to facilitate effective decision making.

HSE Documentation



Monitoring

Trailing indicators

Incident investigation and reporting

VINCI Construction UK Ltd investigate all incidents that result in an injury, or which have the potential to cause significant harm. These arrangements include an incident severity classification system to ensure that high potential incidents are subject to thorough investigation regardless of the injury/harm outcome. All investigation reports and resultant improvement actions are reported through the Footprint system. Close-out of improvement actions is the responsibility of the nominated manager. Progress of the investigation and recommendations will be tracked centrally by the HSE team.

MSS 16 Incident Investigation and Reporting sets out the detailed arrangements for reporting and investigating HSE incidents.

Close calls and positive interventions

VINCI Construction UK Ltd operate a near miss reporting system across all its operations. The close calls and positive interventions system (CCPI) is designed to capture near miss events (close calls) and safety/environmental enhancements made by individuals when they intervene to eliminate or reduce a risk (positive interventions). CCPI reporting is used both to provide rough root cause data about events, and a positive indicator of proactive safety/environmental behaviours. The CCPI process is set-up to facilitate communication and feedback to the workforce on each project or contract on HSE matters. Each project has a nominated CCPI champion who is responsible for coordinating any remedial actions and for the sharing of information in relation to a report.

MSS 2: Close Calls and Positive Interventions Reporting, sets out the detailed arrangements for reporting CCPIs

Leading indicators

Scored inspections

HSE advisers undertake scored HSE Inspections on a regular basis across all operations. The scored inspection system utilises a BRAG rating system (Blue, Red, Amber and Green) and improvement actions are raised and agreed when any significant area of poor performance is identified. Inspection scores, excellence reports, and improvement actions are captured and reported through our Footprint system. Improvement Actions raised following an inspection will be closed out by the regional management and progress will be reviewed at the regular HSE review meetings. Improvement actions identifying significant management failings will be escalated and reviewed at the regular MD's HSE meetings.

Senior Manager audits

Senior Manager HSEQ audits will be carried out according to a programme agreed by each divisional Managing Director. All Senior Management HSEQ audits will be recorded on Footprint.

Internal Audits

Internal audits will be carried out according to a programme developed by the Group HSEQ Director and will be recorded on Q pulse.

Weekly site team inspection

The SSR for each project or contract will ensure that at least one Weekly Site Team Inspection is carried out for his/her project. The inspection will use the standard inspection template, and each inspection report will be stored in-situ for the duration of the project.

Third party management systems certification audits 18001/14001

All parts of the business are certified to OHSAS 18001 and ISO 14001 management standards. ERCVS carry out surveillance and audit to check compliance against these international standards.

Competence

Core HSE training

We provide training to all those who have a critical role to play in the delivery of HSE. We positively support the Build UK Health and Safety Training Standard for our directors, managers, supervisors and operatives. We also maintain a suite of e-learning courses that are mandated for certain activities by either a MSS or EMS. Specialist qualifications and training are also set out in MSS or EMS, and our staff undertaking specialist roles are provided with the relevant training to do so.

MSS 15: Health, Safety and Environmental Training in VINCI Construction UK Ltd, set out the details of training

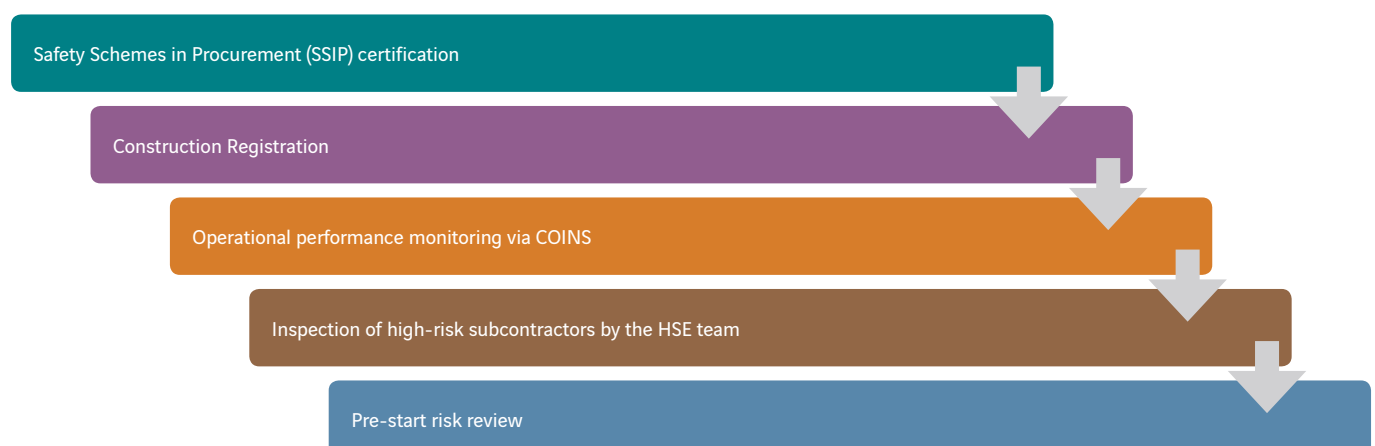
To supplement the HSE training provided to staff the Construction Industry Publications (CIP) Health and Safety Manual is available to all staff through the intranet. The CIP manuals provide detailed advice on legal compliance and industry best practice across a wide range of construction risks.

The CIP Construction Health and Safety manual (available at <http://vinciintranet.vinci.norwest.co.uk/vcuk/technology/environmental/Pages/Guidance.aspx>) includes a list of all applicable health and safety legislation and serves as the standard reference for the company's statutory obligations under UK health and safety law. Any significant changes of the company's legal duties are identified by the Group Director of HSEQ and reported as part of the annual risk review.

Competent subcontractor and supplier selection

Selection of competent contractors is a legal obligation for construction activity under Regulation 4 of the Construction (Design and Management) Regulations 2015, and is a key consideration in the safe delivery of facilities operations.

To ensure that subcontractors working for us have the necessary experience and expertise to prevent harm to individuals or the environment, all companies need to satisfy us that they have sufficient organisation and understanding of HSE matters. Similarly, the teams and individuals that subcontractors deploy to deliver the contract must have in place the necessary understanding and capability to manage the risks on that contract. We do this through a combination of industry accreditation, monitoring of subcontractor performance, and pre-start risk review. There are five steps to the assurance of subcontractor competence, these are:



All contractors working for VINCI have to be certified by a SSIP assessment scheme. SSIP was formed in 2009 to facilitate cross-recognition of such schemes, and is supported by the UK Government and the Strategic Forum for Construction. In addition, all contractors must be registered with Constructionline. Both SSIP and Constructionline are designed to reduce the bureaucracy and cost of prequalification for contractors and we support these principles. These arrangements ensure that all our subcontractors meet the requirements of the Construction (Design and Management) Regulations 2015, and are compliant with PAS91:2013.

The only exceptions to this policy are:

1. Sole traders or labour only subcontractors working under the direct control of a VINCI Construction UK Ltd company. In these cases those at work must be treated as 'employees' in regards to all HSE requirements, such as minimum standards, PPE etc.
2. When a client specifies a broader range of criteria than those specifies in SSIP scheme certification, such as Achilles. In these cases VINCI Construction UK Ltd will have to comply with those client requirements that apply to our own subcontractors.

HSE performance monitoring of subcontractors is reported through the COINS iPortal. Operational teams assess and score each subcontractor, and the HSE team capture performance issues raised during inspections and incident investigations on the system. In the event of a subcontractor being categorised as high-risk, the HSE team may carry out an inspection of that company and advise the divisional Managing Directors of the suitability of that company to work on projects or contracts.

Assessment of the technical expertise and experience of a contractor to undertake a particular work package is the primary responsibility of the relevant project manager. However, the capabilities of the designated team provided by the subcontractor to carry out the works and achieve compliance with all our HSE requirements is established at the pre-start risk review, carried out by the SSR.

All subcontractors, working for VINCI Construction UK Limited, must apply the same criteria when selecting any company to which they contract work to be carried out on a VINCI Construction UK Limited project.

Occupational Health

Occupational ill health is a significant problem for those working in construction. Health risks are identified and managed in the same way as safety risks, as identified on the project risk schedule. This would include but not limited to Driving, Mental Health and Fatigue.

We are a signatory of the UK Government's Public Health Responsibility Deal, and as such have undertaken to provide an occupational health support service to our staff that meets the SEQOHS Occupational Health Standards for Accreditation. Our nominated OH Provider is Clarity Healthcare.

To fully quantify and understand health risks related to specific construction or facilities activities it is sometimes necessary to engage the services of an occupational hygienist. Our nominated occupational hygiene provider is Park Health Ltd.

Workforce consultation and involvement

- Safety alerts, and excellence reports issued via the company intranet
- Close calls and positive intervention (CCPI) reporting
- Footprint, the company HSE reporting platform
- Site-specific safety briefings and inductions
- Communication of task control sheets (TSCs)

Reviews and revisions

| Revision | Date | Revision Comments | By | Approved | Effective |
|----------|---------------|---|--------------------|----------------------|-------------------------------|
| 0 | January 2014 | Replaces HSEP Policy Part 2 Document Number 560/Issue 7 | Andy Sneddon | Andrew Ridley-Barker | 1 st January 2014 |
| 1 | January 2014 | Inclusion of closing out of improvement actions has been added under Monitoring | Andy Sneddon | Andy Sneddon | 1 st January 2014 |
| 2 | March 2014 | Removal of John Stanion's signature | Laura Williams | Andy Sneddon | 6 th March 2014 |
| 3 | April 2014 | Inclusion of Internal audits. Removal of Environmental Policy | Laura Williams | Andy Sneddon | 29 th April 2014 |
| 4 | February 2015 | Amendments of title, dates and charts | Andy Sneddon | Andy Sneddon | 6 th February 2015 |
| 5 | August 2015 | Change CDM 2007 to CDM 2015 change of occupational health provider | Andy Sneddon | Andy Sneddon | 18 th August 2015 |
| 6 | December 2015 | Annual Review | Andy Sneddon | Andy Sneddon | 3 rd December 2015 |
| 7 | July 2016 | HSE Governance updates | Andy Sneddon | Andy Sneddon | 18 th July 2016 |
| 8 | December 2016 | Policy update | Richard Hinchliffe | Bruno Dupety | 1 st January 2017 |