



HEALTH & SAFETY AT WORK POLICY

Purpose and scope

This is the Health and Safety policy statement for VINCI Construction UK (VCIUK). It is owned by the Group Chief Executive Officer (CEO) and sets out our commitment to the management of Health and Safety across all our operations.

Our commitment

- We take our responsibility to manage Health and Safety, very seriously.
- We reject the idea that workplace accidents and work-related ill health are unavoidable.
- We refuse to accept that delivery on time comes before Health and Safety.

Responsibilities

Our CEO is ultimately responsible for Health and Safety in VCIUK and is supported by the Group HSEQ Director, one of his direct reports and a member of the Management Board.

The management of Health and Safety is principally a line management responsibility and so in line with our decentralised operating model, the CEO holds each Managing Director accountable for all aspects of the management of Health and Safety in their business.

The Group HSEQ Director manages a team of professionals to provide each Managing Director (and their teams) with the competent advice they need so they can meet their legal obligations.

We include specific responsibilities for our people in their role descriptions and we set out our general responsibilities in our Group HSEQ Standards.

Our approach

These are the things we do:

- We have a management system for Health and Safety that is certified to OHSAS18001 which is integrated with our systems for managing Quality and the Environment wherever possible.
- We use hazard identification and risk assessment to ensure that we have the right risk controls in place that minimise the chances of injury or ill health through safe systems of work.
- We give our people the right information, advice, training so they know their responsibilities and are competent to work and we hold everyone accountable for their behaviour.
- We have channels of communication which encourage all employees and their representatives to contribute to improvements in our Health and Safety performance.
- We have a just culture which helps us reward contributions to improving Health and Safety and we apply our disciplinary procedures to those who deliberately breach safety regulations, procedures or directions.
- We make sure that Health and Safety is an essential factor in the selection and management of joint venture and supply chain partners.
- We measure and report Health and Safety performance on a regular, consistent and meaningful basis so we can continue improving.
- We record, investigate and report all ill health, incidents, dangerous occurrences and close calls so we can learn from them and comply with the requirements of the law.
- We use plans and objectives to help us improve our performance.
- We review this policy every year, or when there are significant changes to the business.
- We provide sufficient resources to implement this policy in full.



Bruno Dupety
Chief Executive
VINCI Construction UK Ltd



VINCI CONSTRUCTION UK LTD HEALTH & SAFETY POLICY - APPENDIX 1 ORGANISATION AND ARRANGEMENTS

Health & Safety 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 Health & Safety management system (as set out in this document) avoids a prescriptive approach to control.

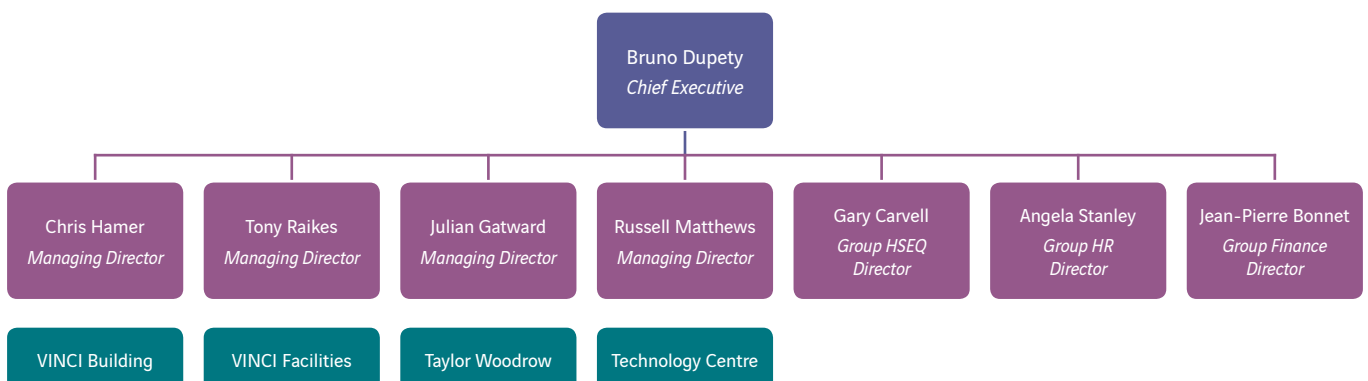
Working within an exhaustive control framework can be counterproductive as the emphasis becomes compliance rather than safety leadership. Differentiating between routine risk and that which is particular to or of high consequence to a specific location or process is essential to delivering our work without 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 Health & Safety that are applied across all divisions which are structured as illustrated below.

The Group HSEQ Director provides the divisional Heads of HSEQ with functional direction and leadership and is accountable for their competence and the quality of support they provide to the business, i.e. how they work.

The divisional Managing Directors provide the Heads of HSEQ with operational direction and leadership and are accountable for their deployment in support of the business, i.e. where they work and what they do.



Review and Planning

HSEQ governance

We are required to manage a diverse range of Health & Safety 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.

Management Board meeting

This meeting is chaired by the VCUK Chief Executive, monthly, and is attended by the divisional Managing Directors and the Group Directors for HSEQ, Finance and Human Resources. The meeting is the authorising authority for all significant changes to Health & Safety policies and systems. The VCUK Chief Executive will chair the meeting, prepare the agenda and papers, and arrange a meeting secretary. The review of Health & Safety performance is a standing agenda item.

Divisional HSEQ reviews

Divisional Health & Safety reviews take place every six months and the divisional Managing Directors must attend or, on an exceptional basis, may nominate a delegate to attend on their behalf. Meeting agenda and minutes will be prepared and circulated to members and Divisional Heads of HSEQ (or Health & Safety for Taylor Woodrow) will attend every meeting.

HSEQ Risk Management

The overall risk profile of our operations is subject to formal review by the divisional Managing Directors on an annual basis and the review findings are carried forward in the form of targets and objectives for the following year.

Minimum Safety Standard 14

Health & Safety 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.

Leading and managing for Health & Safety

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 Health & Safety 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.
- Sufficient resource is made available to enable the Health & Safety policies and related Standards to be implemented in full. In particular, all competency requirements set out in our MSS for designated activities, and the training requirements set out in MSS 15: HSE Training, must be met in full.
- Divisional Health & Safety 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 HSEQ Director.
- The leadership of Health & Safety 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 Health & Safety leadership must be considered in any bonus payment or other incentive paid to any individual.
- A divisional Health & Safety performance review is carried out in conjunction with the HSEQ 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.
- The significant Health & Safety 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, 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.

The Group HSEQ Director will make sure that:

- They provide leadership and management of all matters pertaining to Health & Safety across all areas of the business.
- They drive 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 company's employees, contractors and reputation.
- They provide and support a dedicated team of managers and advisors to ensure the business has access to specialist competent advice and support.

- An annual programme of audits is agreed and delivered covering minimum of 12 audits per year.

Senior Site Representatives (SSRs) will make sure that:

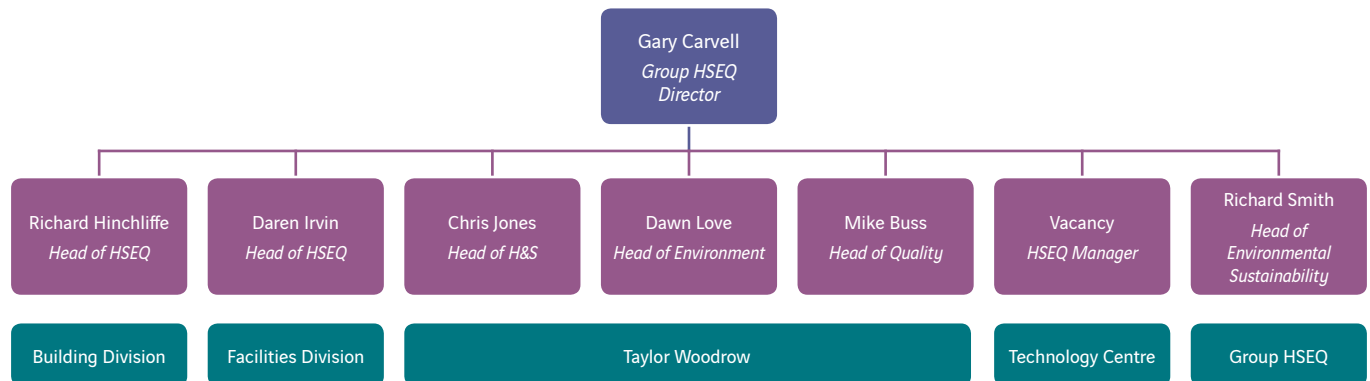
- They provide strong visible proactive leadership in connection with Health & Safety on the contract or project under their control.
- They familiarise themselves with the requirements of all relevant MSS and ensure that all our Health & Safety requirements relating to their contract or project are 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 Health & Safety 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.

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

- They display and communicate at all times the Health & Safety 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.
- They will challenge any unsafe behaviour that presents a risk to health, safety whilst at work.

HSE assistance

VINCI Construction UK Ltd have a network of regional and project-based HSEQ advisers working under divisional Heads of HSEQ to provide specialist support to operational teams managing projects and contracts. The divisional Heads of HSEQ report to the Group HSEQ Director to ensure independence and impartiality. The Group HSEQ Director reports directly to the Chief Executive. The HSE team structure is below:



Control

Minimum safety standards

The company maintains a suite of Minimum Safety Standards (MSS) that mandate certain activities, controls or accountabilities for most known and recurring Health & Safety 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 Health & Safety 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.

Monitoring

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 HSEQ 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 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 behaviours. The CCPI process is set-up to facilitate communication and feedback to the workforce on each project or contract on Health & Safety 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

HSEQ advisers undertake scored 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 review meetings. Improvement actions identifying significant management failings will be escalated and reviewed at the regular MD's meetings.

Senior Manager audits

Senior Manager Audits will be carried out according to a programme agreed by each divisional Managing Director. All Senior Management 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 Health & Safety training

We provide training to all those who have a critical role to play in the delivery of Health & Safety. 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. Specialist qualifications and training are also set out in our MSS, 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 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 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 HSEQ Director HSEQ.

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 Health & Safety 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.

All contractors working for VINCI have to be certified by aSSIP 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 Health & Safety 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 HSEQ 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 HSEQ 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 or contract manager. However, the capabilities of the designated team provided by the subcontractor to carry out the works and achieve compliance with all our HSEQ 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 SEQOSHS 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)

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
9	March 2018	Updated in line with new policy	Gary Carvell	Gary Carvell	28 th March 2018