

# Health & Safety Policy

## for

# Shaftesbury Capital PLC

**Scope:** This document contains the full Health & Safety Policy of Shaftesbury Capital PLC (the “Company”) and was drafted to ensure that the Company complies with the Health & Safety at Work etc. Act 1974, the secondary health and safety legislation made under this Act and the fire safety, building safety and housing legislation relevant to the Company’s operations.

The policy was approved by the Board of Shaftesbury Capital PLC on 20 November 2024.

This policy is due for review by 31 December 2025.

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## 1.0 Introduction

This Health & Safety Policy has been prepared to define the way that Shaftesbury Capital PLC (the “**Company**”) intends to manage health and safety and meet the requirements of the Health and Safety at Work etc. Act 1974, the secondary health and safety legislation made under this Act and the fire safety, building safety and housing legislation relevant to the Company’s operations.

The Company will ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees and any other persons such as tenants, contractors, consultants, agents, visitors and members of the public that may be affected by the Company’s operations.

This will be achieved by providing:

- safe systems of work
- safe plant, machinery and equipment
- safe means of using, handling, storing and transporting, etc. articles and substances
- necessary information, instruction, training and supervision
- wellbeing and mental health support to employees
- safe and healthy places to work, with safe access to and egress from these
- adequate welfare facilities
- arrangements for consultation with employees and other interested parties.

Where the Company controls properties or land on which non-employees are present or can access, the Company will, so far as is reasonably practicable, ensure that the properties or land or anything on the properties or land do not present an unacceptable risk to health and safety. Particular attention will be paid to the health and safety of members of the public that access property or land under the control of the Company.

It is also necessary that our employees:

- take reasonable care for the health and safety of themselves and of any other persons that may be affected by their acts or omissions at work
- co-operate with the Company to assist in meeting the Company’s health and safety standards
- do not interfere with or misuse anything provided for health, safety or welfare reasons.

Failure to comply with the Company’s Health & Safety Policy may lead to one or more of the following:

- injury or ill-health to one or more employees or any other persons that may be affected by the Company’s operations
- damage to the Company’s reputation
- financial losses due to loss of productivity, loss of business, the payment of compensation in the civil courts and increased insurance costs
- enforcement action by statutory enforcement authorities such as the Health & Safety Executive, the Building Safety Regulator, Local Authorities, Fire Authorities and, in the case of Corporate Manslaughter or Gross Negligence Manslaughter, the Crown Prosecution Service

- statutory enforcement action can include imprisonment for individuals, fines for the Company and / or individuals, the service of notices and in the case of Corporate Manslaughter unlimited fines, remedial orders and publicity orders.

The Company recognises the value of the joint guidance “*Leading health and safety at work*” produced by the Institute of Directors and the Health & Safety Executive and has integrated its essential principles into the Company’s Health & Safety Management System:

- strong and active leadership from the top
- worker involvement
- assessment and review.

## 2.0 Health & Safety Policy Statement

Shaftesbury Capital PLC (the “Company”) acknowledges and accepts our statutory responsibilities under the Health and Safety at Work etc. Act 1974 to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees and any other persons such as tenants, contractors, consultants, agents, visitors and members of the public that may be affected by the Company’s operations. All employees have a legal responsibility to take reasonable care for the health and safety of themselves and of any other persons that may be affected by their acts or omissions at work, to co-operate with the Company to assist in the meeting of health and safety standards, and to not interfere with or misuse anything provided for health, safety or welfare reasons.

The Executive Directors of the Company acknowledge and accept their responsibilities for implementing, monitoring and maintaining this Policy and will ensure that health and safety considerations are always given priority in the planning and day-to-day supervision of work.

The Company will, so far as is reasonably practicable, ensure that:

- adequate resources are provided to ensure that proper provision can be made for health and safety, with a commitment to eliminate hazards and reduce risks
- risks arising from work activities are assessed, effective controls are implemented, and suitable policies and procedures are provided, implemented and reviewed
- safe systems of work are provided and maintained
- arrangements for the use, handling, storage and transport of articles and substances for use at work are safe and without risks to health
- all employees receive the necessary information, instruction, training and supervision to secure their safety and health at work and the safety of others who may be affected by their actions
- an appropriate level of health and safety information and / or instruction is provided to tenants, contractors, consultants, agents, visitors and members of the public
- where appropriate, health surveillance will be provided to employees
- wellbeing and mental health support is available to employees
- the provision and maintenance of all plant, machinery and equipment is safe and without risk to health
- the working environment of all employees is safe and without risks to health so as to prevent work related injuries and ill-health and that adequate provision is made with regard to the facilities and arrangements for their welfare at work
- legal and other health and safety requirements are fulfilled
- work related accidents, ill health and safety performance are monitored regularly.

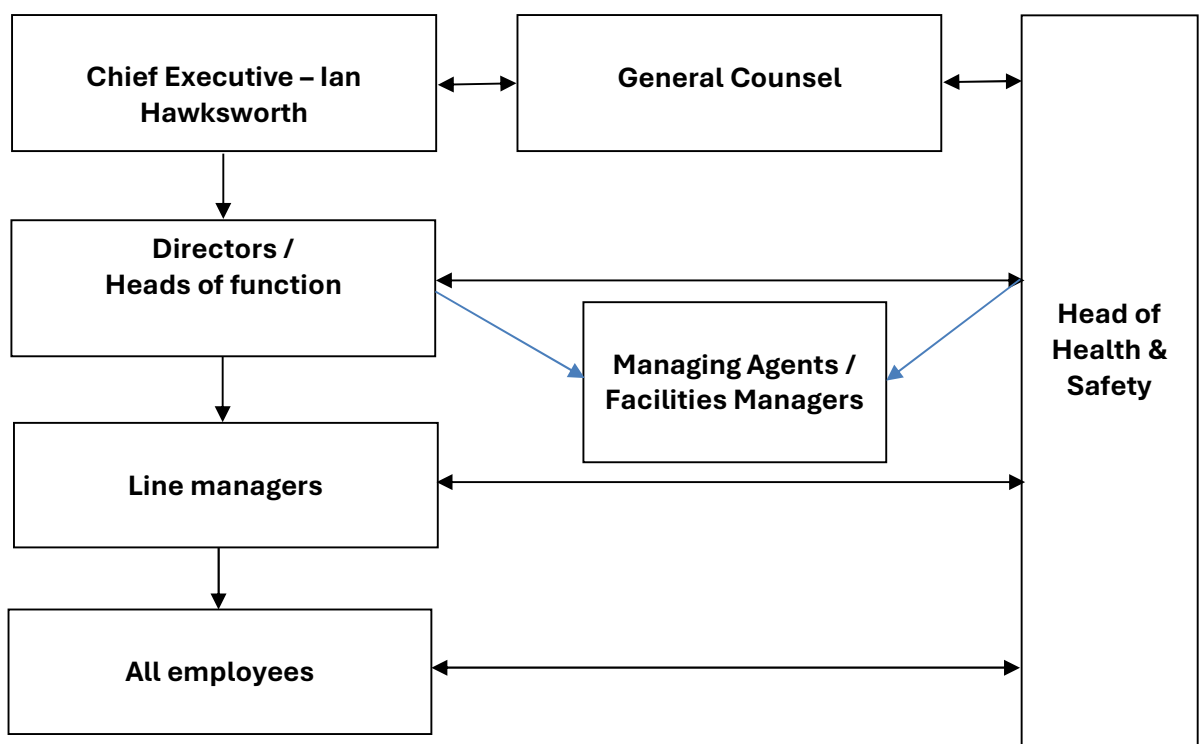
The Company is committed to continual improvement of the Occupational Health & Safety Management System and this Policy will be reviewed annually and when there is a significant change to the Company’s operations or relevant legislation; changes will be communicated to all employees. In addition, clear and meaningful health and safety objectives will be set annually, along with plans to achieve and monitor them. The Company will ensure that there are effective procedures for consultation, communication and participation between all levels of management, employees and other interested parties on all matters relating to health and safety. Detailed information is available to employees on the Company’s SharePoint system and this Policy Statement is published on the Company’s website so that it can be accessed by all interested parties.

### 3.0 Organisation for health and safety

#### 3.1 Health and safety organisational structure within Shaftesbury Capital PLC

Explicit health and safety responsibilities are held by the:

- Chief Executive
- General Counsel
- Head of Health & Safety
- Directors and Heads of function
- line managers
- employees.



#### 3.2 Individual responsibilities

**The Chief Executive is responsible for:**

- establishing a Company health and safety culture in which good health and safety management is recognised, valued and prioritised
- approving the commitment of Company resources to ensure the adequate management of all health and safety matters within the business
- providing information to shareholders on health and safety performance.

**The General Counsel is responsible for:**

- providing advice to the Chief Executive to facilitate the establishment of a health and safety culture in which good health and safety management is recognised, valued and prioritised

- setting the Head of Health & Safety targets and objectives to ensure the necessary competent person support is provided to the Company
- advising on the appointment of additional external, third party health and safety competent person support and legal advice when required
- providing corporate oversight of the health and safety performance of the Company.

**The Head of Health & Safety is responsible for:**

- establishing and maintaining a Company Health & Safety Management System, comprising a Policy and Procedures that identifies and reduces health and safety risks, meets regulatory requirements and encourages a positive health and safety culture
- supporting the Chief Executive, General Counsel, Directors, Heads of Function, Line Managers and employees in delivering their own responsibilities
- supporting the members of the Health & Safety Committees and Safety Leadership Teams in their role as health and safety facilitators
- demonstrating health and safety leadership and setting an example for health and safety across the Company
- establishing a competency framework for all employees and supply chain partners
- monitoring, reviewing and reporting on health and safety performance to the Chief Executive, the General Counsel and the Directors / Heads of function.

**Directors / Heads of function are responsible within their part of the Company for:**

- establishing the Company health and safety culture by being visible on health and safety matters to their staff and other interested parties
- ensuring that health and safety considerations are always given priority in the planning and day-to-day supervision of work
- adequately resourcing for health and safety when preparing and submitting budgets
- accessing the necessary health and safety competent person support
- implementing the Company Health & Safety Policy and Procedures
- monitoring, reviewing and reporting on health and safety performance
- ensuring the Chief Executive, General Counsel and Head of Health & Safety are informed of all serious incidents without delay
- reporting any unresolved health and safety concerns to the Chief Executive or the General Counsel.

**Line managers are responsible for:**

- establishing the Company health and safety culture within their team by being visible on health and safety matters to their staff and other interested parties
- ensuring that health and safety considerations are always given priority in the planning and day-to-day supervision of work
- adequately resourcing for health and safety when preparing and submitting team budgets
- implementing the Company Health & Safety Procedures
- following health and safety instructions issued by their Director / Head of function
- recording and reporting all incidents, including near misses and accidents without delay
- ensuring their Director / Head of function and Head of Health & Safety are informed of all serious incidents without delay

- reporting any health and safety concerns to their Director / Head of function and Head of Health & Safety.

#### **Employees are responsible for:**

- taking reasonable care for the health and safety of themselves and of any other persons that may be affected by their work
- not interfering with or misusing anything provided for health, safety or welfare reasons
- following the Company Health & Safety Procedures and any health and safety instructions issued by their line manager
- reporting all incidents, including near misses and accidents without delay
- reporting any health and safety concerns to their line manager.

### **4.0 Arrangements for health and safety**

The arrangements given below detail on a topic-by-topic basis how good standards of health and safety will be achieved across all of the Company's business operations. They have been approved by the Company Board. The details of how the required risk control system for each are will be implemented are contained within the Company's Health & Safety Procedures.

#### **4.1 Accidents, incidents, near misses and concerns**

The Company will discharge its legal duty to ensure, so far as is reasonably practicable, the health and safety of all employees and others that may be affected by our work activities. Particular attention will be paid to ensuring the health and safety of members of the public that access property or land under the control of the Company. The Company will have processes in place to ensure all accidents, incidents, near misses and concerns are recorded and that investigations are carried out to determine their immediate and underlying causes, with the appropriate remedial actions being taken to prevent any recurrences. The reporting requirements of the Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 will be met in full.

#### **4.2 Asbestos**

The Company recognises the significant hazards posed by asbestos containing materials and will comply with the Control of Asbestos Regulations 2012. Company employees will not undertake asbestos surveying, treatment (e.g. encapsulation) or removal works and the Company will instruct competent third party specialists for these services. Up to date and complete information will be held relating to the known or suspected presence of asbestos in the parts of the properties under the control of the Company. This will be shared with all relevant tenants and instructed third parties prior to occupation and any works being carried out. As part of the planning for projects and works, the necessary assessment and, if required, surveys to identify the presence of asbestos will be undertaken. The Company will ensure that all employees who face the potential risk of working in properties that may have asbestos containing materials have received the appropriate level of asbestos awareness training.

#### **4.3 Competence and training**

The Company understands that a key element of successfully managing health and safety risks is to ensure that all employees have the appropriate competency to fulfill their duties in a manner that is safe and without risks to health for themselves and others. In the Company, health and



safety competency is viewed as being a combination of having the appropriate levels of knowledge, ability, training and experience, and the Company will provide the appropriate resources and systems for assessing these and supporting employees should a gap in their competency be identified. The same requirements and definition of competency are applied to all instructed service providers such as managing agents, facilities managers, contractors, consultants and others.

#### **4.4 Confined spaces**

The Company recognises the specific hazards that exist when working in confined spaces (working includes any visit, inspection, survey or other task) and will comply with the Confined Space Regulations 1997. Every endeavour will be made to proactively identify the confined spaces in the Company's properties with details being passed to the relevant Company employees and relevant third parties, including tenants. All work in confined spaces will be risk assessed and method statements prepared for each individual confined space task prior to its commencement. The Company will also ensure that all instructed service providers such as managing agents, facilities managers, contractors, consultants and others undertaking work in confined spaces prepare the appropriate risk assessments and method statements prior to any tasks commencing in a confined space.

#### **4.5 Construction Design and Management ("CDM")**

The Company recognises that construction activities carry some of the highest health and safety risks of serious accidents and ill-health and will comply with the CDM Regulations 2015 for all notifiable projects, non-notifiable projects and general works. The Company is aware of the explicit legal responsibilities held by the CDM role holders of: Client, Principal Designer, Designer, Principal Contractor and Contractor. The Company understands its role as a CDM Client and as a Designer. As a Client, the Company's duties extend to ensuring that suitable arrangements are made for managing projects and works from conception to completion and processes are in place to monitor the standards of health and safety on projects and during works. The Company ensures all employees carrying out CDM role holder duties hold the appropriate levels of competency, including training, and has processes in place to ensure all appointed dutyholders are competent. The Company will ensure that all relevant parties involved with a project or general works have fully considered the risks to members of the public and tenants that may be affected and have the necessary controls in place.

#### **4.6 Contractors, consultants, managing agents and other supply chain partners**

The Company recognises the health and safety benefits of engaging with competent third parties to provide services to the Company itself, to tenants and to the members of the public and other visitors that access land and property under the control of the Company. The Company carries out health and safety assessments of these third parties as part of the engagement processes, with specialist assessments being carried out on Principal Designers, Principal Contractors and Project Managers involved in the delivery of CDM projects. Following appointment, processes are in place to monitor the health and safety performance of instructed third parties.

#### **4.7 Consultation and governance**

The Company recognises that effective consultation mechanisms and robust governance processes are a pre-requisite for achieving the successful implementation of a health and safety management system and are essential to instill a meaningful health and safety culture within the

Company. All Directors and Heads of Function are required to bring all relevant health and safety information to the attention of their team members, make them aware of how to raise any health and safety concerns and will ensure that their teams are properly represented on a Health & Safety Committee or a Safety Leadership Team meeting.

#### **4.8 Electrical safety**

The Company will have processes in place to ensure compliance with the Electricity at Work Regulations 1989 and the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 for both fixed electrical installations and portable electrical appliances in the Company's properties and offices. The Company's employees will not carry out works on fixed or portable electrical systems and will take all precautions to avoid coming into contact with live electrical systems. The Company will instruct competent third party specialists to carry out such works. Processes with strict controls are in place to minimise working on or near live electrical system in the Company's properties or on project sites.

#### **4.9 Falls and falling objects**

The Company is aware that falling from height is the biggest single cause of accidental death amongst the working population of the UK. Working at height will only be permitted when all alternatives have been investigated and found to be impracticable. The clear hierarchies of control and specific legal duties placed upon duty holders that are contained within the Work at Height Regulations 2005 will be followed. The Company will ensure that suitable training and equipment are provided to all employees that work at height. All health and safety assessments of instructed third parties will include a review of work at height controls and monitoring visits will include an assessment of the working at height safe working practices. All projects and works sites will be required to have the necessary safeguards to protect workers, tenants, tenant employees, visitors and passers-by from falling objects.

#### **4.10 Fire safety and building safety**

The Company recognises that risks to life safety from fires are present at all properties the Company owns and during all construction projects and works. The Company will comply with the Regulatory Reform (Fire Safety) Order 2005, Fire Safety Act 2021, Building Safety Act 2022, regulations made under these Acts and all relevant parts of the Building Control system. All Principal Contractors and Contractors will be required to have site fire safety plans and hot works permit systems in place. Expert third parties will be instructed to carry out fire risk assessments of all parts of properties that are under the control of the Company, (where necessary) to draft fire strategy documents, and to advise on the installation of active and passive fire safety systems. Commercial tenants will have clear standards set out in relation to fire safety for their fit-outs, any refurbishments and during their day-to-day operations. Residential tenants will be liaised with to ensure that they are aware of the expected behaviours in terms of preventing fires. All tenants will be informed of the fire safety arrangements for the building they occupy, as is set by legislation and accepted property industry standards. Buildings with two or more residential properties and common areas that are between 11 metres and 18 metres will have the additional fire safety checks carried out on them as is required by fire safety legislation. Where the Company is a Principal Accountable Person or Accountable Person of a Higher-risk Building as defined by the Building Safety Act 2022, the Company will ensure it meets the detailed requirements set for these dutyholder positions.

#### **4.11 First aid**

The Company will ensure that an assessment of first aid needs has been carried out for the Company's operations and that the appropriate arrangements are made for first aid provision for all employees and visitors, including members of the public, to the Company's offices and properties and land under the Company's control.

#### **4.12 Gas and other heating and hot water systems and appliances**

The Company recognises that unsafe gas and other types of heating and hot water systems and appliances have the potential to lead to carbon monoxide poisoning, fires and explosions. The safe installation and use of gas, oil, solid fuel and other systems and appliances will therefore be undertaken in compliance with any relevant parts of the Gas Safety (Installation and Use) Regulations 1998, Workplace (Health, Safety and Welfare) Regulations 1992, Provision and Use of Work Equipment Regulations 1998 and the relevant landlord and tenant legislation. All short-term residential leases prohibit the use of fireplaces. Only GasSafe registered and competent oil and solid fuel engineers will be instructed to undertake works on heating and hot water systems.

#### **4.13 Hazard identification and risk assessment**

The Company understands the concepts of hazard identification and risk assessment and of their importance in reducing accidents and ill-health. Measures will be put in place to identify hazards both proactively and via the ongoing monitoring of accidents, incidents, near misses and concerns. Risk assessment systems will be implemented to ensure compliance with the Management of Health & Safety at Work Regulations 1999 and all other regulations with risk assessment requirements. These systems will culminate in the implementation of meaningful risk control systems across all the Company's operations, including the provision of personal protective equipment. All health and safety assessments of instructed third parties will include an assessment of their hazard identification and risk assessment processes.

#### **4.14 Hazardous substances**

The Company recognises that the uncontrolled use and storage of or exposure to hazardous substances (whether physical, chemical or biological) may result in deleterious health effects. Full compliance with the Control of Substances Hazardous to Health Regulations 2002 will be attained with an emphasis on selecting the least harmful product that will produce the desired outcomes. All health and safety assessments of instructed third parties will include an assessment of their hazardous substance identification and risk assessment processes.

#### **4.15 Manual handling**

The Company is aware that musculo-skeletal and other injuries caused by poor manual handling techniques are a common cause of workplace injury and of lost-time. The Manual Handling Operations Regulations 1992 will be followed, with the avoidance of hazardous manual handling operations taking precedence. All health and safety assessments of instructed third parties will include an assessment of their manual handling assessment processes.

#### **4.16 Members of the public and residential tenants**

The Company prioritises the health, safety and security of the members of the public that access property or land under the control of the Company and residential tenants in occupation at the

Company's properties. The Company ensures that the adopted hazard identification and risk assessment processes include the potential hazards that may affect these specific groups to identify and implement rigorous risk control systems to ensure, so far as is reasonably practicable, their health, safety and security. This includes having suitable and sufficient risk assessments in place and the inclusion of health, safety and security checks during short-term tenant check-ins and mid-term property inspections.

#### **4.17 Personal safety**

The Company recognises that as part of its everyday operations many employees will be working without other colleagues present and they are therefore lone working. This may be at a property (whether occupied or vacant), at a project site, an office or whilst travelling on Company business. Therefore, as a matter of clear priority every line manager will ensure that all employees are fully conversant with and understand all aspects of the Company personal safety procedures. In addition, we encourage all employees to complete an individual Personal Safety Risk Assessment and any necessary remedial actions identified will be addressed. All health and safety assessments of instructed third parties will include an assessment of their personal safety processes.

#### **4.18 Plant and equipment**

The Company recognises that the provision and use of plant and equipment is an integral part of its operations. The Company will comply with the Workplace (Health, Safety and Welfare) Regulations 1992, Provision and Use of Work Equipment Regulations 1998, Lifting Operations and Lifting Equipment Regulations 1998 and Pressure Systems Safety Regulations 2000. Training and, where required, personnel protective equipment will be provided to all employees for the plant and equipment they use. All health and safety assessments of instructed third parties will include an assessment of their hazard identification and risk assessment processes for the selection, use and training of operatives of plant and equipment.

#### **4.19 Workplace risks**

The Company will provide workplaces that are safe, without risks to health and have appropriate welfare facilities in line with the Workplace (Health, Safety & Welfare) Regulations 1992. Measures will be taken to protect employees and visitors from slipping and tripping accidents. Individual workstations and the use of equipment such as computers will be assessed to ensure compliance with the Health & Safety (Display Screen Equipment) Regulations 1992. The Company's responsibilities are acknowledged as extending to the safe management of events for members of the public, employees, tenants, prospective tenants, supply chain partners and others.

#### **4.20 Vulnerable groups**

The Company recognises that certain vulnerable groups do require greater support to ensure their health and safety and the Company is fully aware of the requirements regarding such groups contained within the Management of Health & Safety at Work Regulations 1999. These groups include young persons, the elderly, those with a disability (including long term ill-health issues) and expectant, new and nursing mothers. Appropriate measures will be put in place to provide any additional measures required.