

# RWS Group

## Health and Safety Policy

**Author:** Health and Safety Committee

**Approver:** Ian El-Mokadem

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## 1 Document history

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## 2 Scope

This Health and Safety policy (“Policy”) sets out the approach RWS will take to minimise the Health and Safety risks of our day-to-day activities and maximise our colleagues’ safety at work.

This Policy applies to RWS Holdings plc, its affiliates, subsidiaries, divisions, operations, functions and locations worldwide.

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### 3 Terms and definitions

- HSMS – Health and Safety Management system
- ICET Tool – Online tool to manage the HSMS

### 4 Associated documents

- Colleagues: Health and Safety Procedure
- Freelancers, Suppliers, Contractors: Health and Safety Procedure
- Home Working/Lone Working/Mobile Working: Health and Safety Procedure
- Office: Health and Safety Procedure
- Health and Safety Training Procedure
- Health and Safety Communication Procedure

### 5 Introduction

RWS Holdings plc and its affiliates and subsidiaries (“RWS” or “Group”) is committed to providing the highest standards of governance in all its business undertakings. In doing so, it recognizes that protecting the safety of its colleagues is an essential objective for the Group.

It is RWS’s firm resolve to comply with local legislation and encourage colleagues to contribute to their own health, safety and welfare and that of their colleagues and any individuals affected by RWS’s business undertakings.

This Policy will be communicated to all colleagues, freelancers and contractors and training will be provided so that all colleagues are aware of their responsibilities under the Policy.

As RWS has its head office in the United Kingdom (“UK”) and is publicly listed on the Alternative Investment Market, the London Stock Exchange regulated market, the Group’s policies are UK law compliant. For those jurisdictions in which RWS operates where there is a higher local standard for Health and Safety required than in the UK, the local legal requirements will apply.

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A more detailed series of individual Health and Safety procedures (“Procedures”) set out a range of procedures to support compliance with this Policy.

The purpose of this Policy is to ensure that, collectively, we endeavour to reduce the incidence of accidents, incidents, dangerous occurrences and ill health within our workplace and ensure that our Procedures remain effective. All colleagues should read this Policy and the associated Procedures documents to ensure that they are aware of their responsibilities.

## 6 Statement of Intent

It is RWS’s intent to provide a safe and healthy workplace, with adequate prevention and controls of Health and Safety risks arising from business activities in order to minimize accidents, injury or ill health. In support of this intent, all Group locations will:

- establish and maintain sufficient resources and infrastructure for setting and reviewing Health and Safety systems and programmes to maintain internationally accepted safety standards;
- initiate and maintain a culture of continual improvement in Health and Safety management and Health and Safety performance;
- maintain a full understanding of applicable local Health and Safety legislation, approved codes of practice and official guidance. RWS will seek to ensure that applicable legislation is considered when establishing, implementing and maintaining its safety management system;
- provide such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health, safety and welfare at work of colleagues and those who could be affected by the Group’s operations. Where necessary and legally permissible, RWS will retain associated Health and Safety records;
- provide and maintain a working environment, so far as is reasonably practicable, that is safe and without risk to health and adequate regarding facilities and arrangements for welfare at work. This includes safe access and exit points which are well maintained, as well as the maintenance of equipment and implementation of safe systems at work;
- provide, so far as is reasonably practicable, safety and absence of risk to health in connection with the use, handling, storage, transport and disposal of hazardous articles and substances. However, it should be noted that RWS is a

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business services organization and has limited exposure to hazardous substances; and

- obtain the full co-operation and involvement of colleagues and contractors in attaining Health and Safety objectives through participation, colleague consultation and effective communication.

Everyone whose work may have a significant impact on Health and Safety will be trained and competent to do their tasks and held accountable for complying with the Policy and accompanying Procedures. All colleagues are responsible for undertaking their duties and responsibilities safely, both personally and with due regard to others. Everyone has a duty to report workplace conditions or practices that pose a health or safety hazard and to take reasonable actions to alleviate such risks.

## 7 Roles and Responsibilities

RWS manages this Policy through a number of delegations of responsibility.

The Board has ultimate responsibility for Health and Safety matters at the Group.

The Chief Executive Officer will ensure relevant reports are submitted to the Board on a regular basis and will be responsible for the Health and Safety performance of the Group.

The Health and Safety Committee is responsible for reviewing and updating the Policy and monitoring and managing overall compliance. The members of this committee vary from time to time, with the Group Chief Financial Officer, the Group Health, Safety and Facilities Director and the Group Business Continuity Manager being ex-officio members.

The structure for managing compliance with this Policy at each site will be set out in each site's Business Continuity Plan. A Health and Safety Lead is responsible for managing local compliance – ordinarily the Health and Safety Lead will be the site leader, although at some sites this responsibility will lie with a Facility/Office Manager. Health and Safety Leads will be assisted by an identified Health and Safety Representative at each location. It should be noted that, at some offices, the Health and Safety Lead will also be the Health and Safety Representative. Members of the Executive Team have overall responsibility for Health and Safety at sites where they are the nominated Executive Team member.

Where a Health and Safety matter is required to be escalated under the Policy or Procedures it should be reported as follows:

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- by colleagues to their Manager;
- by Managers to their Health and Safety Lead;
- by Health and Safety Leads to Health and Safety Representatives or the Group Health, Safety and Facilities Director or the relevant member of the Executive Team responsible for that site;
- by the Health and Safety Representative, Group Health, Safety and Facilities Director or the member of the Executive Team responsible for that site to the Health and Safety Committee; and
- by the Health and Safety Committee to the Chief Executive Officer or Board.

### 7.1 The Board and Chief Executive Officer

The Board has ultimate responsibility for determining the Group’s approach to Health and Safety matters and approving this Policy. It will receive reports and monitor performance in order to fulfil its responsibilities.

The Chief Executive Officer (“CEO”) governs the strategic direction of the organization by making top-level managerial decisions. The CEO is accountable for the Health and Safety performance of the Group.

The CEO has the responsibility to ensure that:

- a strong, positive Health and Safety culture is developed throughout the Group;
- a minimum standard of acceptable Health and Safety is established throughout the Group;
- the Health and Safety Policy is kept up-to-date and that Procedures are developed and implemented by the Health and Safety Committee in support of this Policy;
- the [Group’s Health and Safety statement of intent](#) is displayed within each office and at any other permanent place of work in a prominent area;
- the Group’s Health and Safety culture is communicated to all its colleagues, freelancers and contractors;
- reporting on Health and Safety performance (on a regular basis and incident-led, as necessary) is tabled at RWS Holdings plc Board meetings and Health and Safety is reviewed by the Executive Team at least once each financial year;

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- the [Group`s Health and Safety statement of intent](#) is kept up to date and that the Group`s Health and Safety management system (“HSMS”) is reviewed regularly through the Health and Safety Committee;
- the HSMS is in place for the effective planning, organization, control, monitoring and review of preventive and protective measures;
- all levels of management have a positive approach to safety and that Health and Safety arrangements are being applied effectively;
- adequate resources are available to implement the HSMS, including the Group`s Health and Safety Policy and Procedures;
- systems are implemented to identify, mitigate and reduce (as far as is reasonably practicable) Health and Safety risks within the Group, including accidents at work, health hazards, loss or damage to Group property and risks to clients, vendors and the public caused through Group`s activities; and
- the workplace is maintained to the statutory standards of health, safety and welfare.

## 7.2 Executive Team

The Executive Team is responsible for setting the Group`s strategic goals and planning processes, including supporting and promoting a positive Health and Safety culture aligned to the Group`s strategic goals. Members of the Executive Team have overall responsibility for Health and Safety at sites where they are the nominated Executive Team member

The Executive Team has the responsibility to ensure that:

- they promote the importance of Health and Safety matters within the Group;
- they support the communication of the Policy and Procedures to all colleagues, freelancers and contractors;
- guidance and leadership on Health and Safety matters is provided to their management teams;
- adequate resources are made available for the implementation of Health and Safety requirements within the Group and any necessary major Health and Safety expenditure is authorized;
- (at sites where they are the nominated Executive Team member) a Business Continuity Plan is in place and that a Health and Safety Lead and a Health and Safety Representative have been appointed to manage compliance with this Policy at the relevant site;

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- they have a working knowledge of the areas of Health and Safety that are regulated by various governmental agencies applicable to the Groups operations; and
- Health and Safety is included as an agenda topic at least once each financial year at Executive Team meetings.

### 7.3 Health and Safety Committee

The Health and Safety Committee provides a structured approach to consultation. They provide a forum where management and colleagues can work together to address any Health and Safety issues. The Health and Safety Committee will take all reasonable and practicable steps to maintain a safe and healthy working environment that complies with statutory requirements.

This will be complemented by an ongoing programme of Health and Safety initiatives designed to keep colleagues informed of their Health and Safety responsibilities.

The Health and Safety Committee has the responsibility to ensure that:

- a regular review (at least annually) of the Group's Health and Safety Policy and Procedures is undertaken to ensure that they reflect any organizational changes and captures new risks;
- a regular review of the Group's accidents, incidents, dangerous occurrences and notifiable diseases statistics is undertaken and reports with recommendations of remedial actions is produced for the Executive Team;
- a regular review of the Health and Safety checks, audits and statutory inspections reports is undertaken;
- any external reports from enforcement agencies are reviewed and that the appropriate actions are taken;
- a regular review of all Health and Safety training and instruction activities is conducted and to report the findings to the Board;
- a regular programme of communications is implemented to raise awareness of Health and Safety matters throughout the Group;
- safe systems of work and safety procedures are developed throughout the Group;
- a regular review (at least annually) of all Group risk assessments is conducted and to report the findings to the Executive Team;

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- a regular review of all Health and Safety activity reports and performance statistics is undertaken; and
- reports from Health and Safety Representatives are reviewed.

In meeting its responsibilities, the Health and Safety Committee will approach its work in a way which reflects and promotes the Group’s values.

#### 7.4 Health and Safety Leads

Health and Safety Leads are responsible and accountable for the Health and Safety performance of their site as specified in the site Business Continuity Plan. Ordinarily this role will be fulfilled by the local site leader, but at some sites the Health and Safety Lead role will be transferred to Facility/Office Managers and, where this is the case, it will be set out in the site Business Continuity Plan.

The relevant Health and Safety Lead has the responsibility to ensure that:

- the [Group’s Health and Safety statement of intent](#) is displayed in a prominent area and that colleagues are familiar with the requirements of the Health and Safety Policy and Procedures;
- each colleague based on the site is aware of their Health and Safety responsibilities and they will consult with these colleagues on issues affecting their safety as they arise;
- their workplace is arranged and maintained to aid the safety of all colleagues;
- risk assessments are undertaken and recorded, as required, and the results are disseminated to the relevant colleagues. The methods used to assess the risks will be chosen and used to take account of local requirements;
- all equipment provided is safe for use, inspected and maintained in accordance with best practice, and that only competent colleagues use such equipment;
- all necessary safety devices and protective equipment, including fire and emergency equipment, is available and maintained;
- all maintenance and other work activities are planned and conducted with regard to statutory provisions and good working practice;
- fire-fighting equipment is maintained, fire exits are kept clear and fire drill practices are organized and recorded at least annually;
- adequate first aiders or appointed persons are available to deal with injuries resulting from workplace accidents;

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- welfare provisions are maintained and sufficient first aid kits are available; and
- any external contractors selected to conduct work on behalf of the Group or landlord are able to satisfy their responsibilities regarding health, safety and welfare and are aware of restrictions affecting their operations.

## 7.5 Health and Safety Representatives

Each office location will have a Health and Safety Representative who will help to implement the Group’s HSMS across their area of responsibility. Each Health and Safety Representative is identified in the site’s Business Continuity Plan.

Health and Safety Representatives have the responsibility to ensure that:

- they represent the interests of the Group to colleagues on Health and Safety matters;
- they inform the Health and Safety Leads of potential hazards and dangerous occurrences within the workplace. This includes advising on general matters affecting the Health and Safety of the colleagues they represent;
- the Group’s online HSMS tool (“ICET Tool”) is kept up to date including ensuring that investigation into the causes of accidents, work-related disease, ill-health and dangerous occurrences is conducted and reported. The local authorities’ requirements/regulations should be taken into consideration when reporting;
- all required reports and actions regarding Health and Safety matters are completed and forwarded to the relevant person on time;
- any accident, dangerous occurrence or incident is fully investigated and reported;
- all necessary risk assessments are completed and that all colleagues, freelancers, suppliers, contractors and visitors are made aware of their content;
- all relevant Health and Safety checks, inspections and audits are completed on time and reported via the ICET Tool; and
- they attend Health and Safety meetings as required.

## 7.6 Managers

Managers are those managers that are managing internal or external colleagues and have direct or dotted direct line reports. They are responsible and accountable for the Health and Safety performance of these colleagues.

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Managers have the responsibility to ensure that:

- each colleague under their control is aware of their Health and Safety responsibilities and will consult with these colleagues on issues affecting their safety as they arise;
- appropriate safety induction training and supervision is given to new colleagues and appropriate training and periodic retraining is given to all colleagues within their control;
- they provide suitable and adequate information, instruction, and supervision to all colleagues within their control;
- their office workplace is arranged and maintained to aid the safety of colleagues;
- risk assessments are undertaken and recorded, as required, and the results are disseminated to relevant colleagues, including home workers; and
- all equipment provided is safe for use, inspected and maintained in accordance with best practice, and only competent colleagues use such equipment.

## 7.7 Colleagues

Colleagues are those who are directly employed by the Group and have a contract of employment. They are responsible for their own Health and Safety and those who may be affected by their acts or omissions.

All colleagues of the Group have the responsibility to ensure that:

- they provide and maintain safe and healthy working conditions, taking account of any statutory requirements;
- they read and confirm that they understand and will comply with the Group's Health and Safety Policy and Procedures as far as it relates to their safety and that of other colleagues;
- they will take reasonable care of their own Health and Safety and that of others who may be affected by their acts or omissions;
- they will not interfere with anything provided to safeguard their Health and Safety;
- they will wear personal protective clothing and equipment as identified by risk assessments;
- they are required to fully co-operate with any reasonable request from their Manager regarding Health and Safety matters;

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- they are responsible for the correct use and storage of their tools and equipment. They must also ensure that these are not used in a way which could endanger themselves or others and report any defects immediately;
- they will not use equipment for purposes for which they are not designed;
- they will not attempt to use, repair, or maintain any equipment or machinery for which they have not received full instructions or training;
- they will, wherever possible, attempt to reduce hazards by their own actions (e.g. remove trip hazards) and warn others of possible dangers;
- they will report the abuse of any facilities to their Manager; and
- they will inform their Manager of any changes to their health, either temporary or permanent, which may affect their working ability or suitability to conduct any particular task(s).

### 7.8 Freelancers, Suppliers, Contractors and Visitors

Freelancers and Contractors are self-employed individuals or companies who are not contractually bound to one specific employer but who provide goods or services to the Group. Suppliers are those individuals or companies that provide goods or services to the Group. Visitors are those individuals or companies that are visiting a Group office for business or personal reasons.

Freelancers, Suppliers and Contractors have the responsibility to ensure that:

- they are responsible for their own Health and Safety;
- their actions do not jeopardize the safety or health of others;
- they obey any site safety rules, particularly regarding the use of safety equipment;
- they understand and follow Health and Safety rules and procedures for the safe performance of their assigned task;
- they maintain a healthy and safe place of work and co-operate with Managers in the implementation of Health and Safety matters;
- they follow the established procedures for accidents and near misses reporting; and
- they report any absences from the Group caused by accident or illness.

The Health and Safety Policy and Procedures are available to all Freelancers, Suppliers and Contractors. Acceptance of their contract with RWS will imply acceptance of these

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rules and any issues or conflict arising during the course of their contract must be highlighted immediately to their direct report in RWS.

Visitors have the responsibility to ensure that:

- they are responsible for their own Health and Safety;
- they are made aware of the site visitors safety procedure
- their actions do not jeopardize the safety or health of others;
- they follow any safety rules, particularly regarding the use of safety equipment; and
- they ensure they understand and follow Health and Safety rules and procedures for the safe performance of their assigned task(s) if applicable.

### 7.9 Health and Safety Sub-Committee

The Health and Safety Sub-Committee will be responsible for conducting specific projects under the instruction of the Group Health and Safety Committee.

The Health and Safety Sub-Committee has the responsibility to ensure that:

- any project is completed and conduct in line with the agreed aims and objectives; and
- members of the Health and Safety Sub-Committee will be appointed from time to time, as appropriate, depending on the nature of the project being undertaken.

## 8 Health and Safety Procedures

This section lists and provides link to the Health and Safety Procedures (which are available on the RWS Hub). [Health and Safety Procedures](#)

- Colleagues Health & Safety Procedure
- Freelancers, Suppliers, Contractors Health and Safety Procedure
- Home Working/Lone/Mobile Working Health and Safety Procedure
- Office Health & Safety Procedure
- Health and Safety Training Procedure
- Health and Safety Communication Procedure

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## 9 Policy review

This Policy is available on the Group’s intranet. If there are amendments to applicable legislation or regulatory requirements, the Policy will be amended to reflect these.

There will be an annual review by the Health and Safety Committee to ensure it is fit for purpose and remains effective. Any changes will be communicated by email by way of a “Health and Safety update, team briefings or training, depending on the complexity of the relevant amendment.

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