

Curo Enterprise Ltd

Health & Safety Policy



Version N°.	0.9 Issue document
Date:	27 June 2025
WRITTEN BY	Steve Cole External HS&E Adviser
REVIEWED BY	Andrew Culverhouse Curo Enterprise Ltd - H&S Manager Mulberry Project
APPROVED BY	Simon Collins Director with Responsibility for HS&E Curo Enterprise Ltd

PREVIOUS VERSIONS	
Number	Date:
0.0	01 Feb 2017
0.1	24 Jul 2017
0.2-07	Previous Revisions
0.8	27/06/2024
0.9	27/06/2025

Table of Contents

1.0 Group Requirements for Operating Companies.....	3
2.0 Introduction	3
3.0 General Safety Principles.....	4
4.0 H&S Policy Statement.....	4-5
5.0 Organisation.....	6
6.0 Responsibilities.....	6-7
7.0 Risk Management.....	8
8.0 Co-Operation	9
9.0 Communication	9
10.0 Safety Monitoring Systems	9
11.0 Revision and Audit.....	10

1.0 Group Requirements for Operating Companies

Throughout their own Health and Safety structure and the Health and Safety team Curo Enterprise Ltd will be responsible for:

- Implementing the Groups stated requirements (e.g. Operational Standards) and supporting the Group's strategy, targets, commitments and programmes/initiatives in respect of Health and Safety.
- Setting a local strategy for Health and Safety in support of Curo Enterprise Ltd.'s aims and objectives.
- Establishing and maintaining comprehensive Health and Safety operational arrangements (Management Systems) which encompass all relevant areas of operations.
- Providing operational 'day to day' Health and Safety support to all relevant areas of operations through the Director with Responsibility for HS&E.
- Undertaking incident investigation and communicating the lessons learnt on a wider basis where appropriate.
- Setting minimum policy requirements for Health and Safety training and the provision of a supporting training programme for staff and where relevant the supply chain.
- Participating actively in Group Health and Safety meetings and support the principles of sharing lessons learnt and best practice throughout the Group.
- Monitoring and measuring performance across the business in all key areas of operations.

2.0 Introduction

Curo Enterprise Ltd has at the heart of its undertakings a Health & Safety Policy that provides a systematic approach to the provision of health and safety at the workplace for employees, contractors, consultants, and other people who may be affected by the activities of Curo Enterprise Ltd.

The aim is to provide a workplace environment without risk to health and safety.

It is based upon the principles laid down in health and safety legislation, governmental guidance and industry best practice. It is reviewed and audited annually for compliance with legal requirements and with a view to defining areas for further enhancement. These principles are contained within the Safety Management System.

The management elements are as follows:

1.1 Health and Safety Policy

1.2 Organisational arrangements

1.3 Responsibilities

1.4 Risk Management

1.5 Co-operation

1.6 Communication

1.7 Safety Monitoring Systems

1.8 Revision and Audit

3.0 General Safety Principles

General Safety Principles

2.1 The Board of Directors will:

- a) Include health and safety performance data in the Curo Enterprise Ltd annual reports
- b) Indicate publicly which Director holds responsibility for health and safety
- c) Include health and safety on the agendas of Board meetings

2.2 Raising workplace standards and the awareness of health and safety among Directors, Managers and workers throughout the organisation, subcontractors and suppliers.

2.3 Encouraging good standards of health and safety throughout the Curo Enterprise Ltd.'s subcontractors and suppliers.

4.0 H&S Policy

This Policy is prepared in accordance with section 2(3) the Health and Safety at Work etc. Act 1974, with the intention of promoting a safe working environment that will, so far as is reasonably practicable, ensure the safety and health of all workers and to enable Curo Enterprise Ltd to comply with legislation.

A safe place of work and safe systems of work can only be achieved by the co-operation of the workforce and management with determination to promote and maintain a strong safety culture in all of the Curo Enterprise Ltd activities.

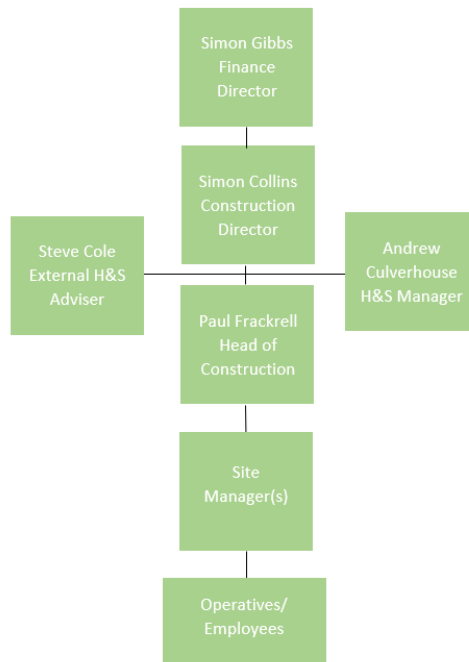
This document sets out the aims of the Curo Enterprise Ltd, details the organisation that will manage and promote its objectives, together with the arrangements contained within its Safety Management System that it considers necessary to inform and guide personnel in achieving a good health and safety culture.

This Policy will be reviewed as necessary to ensure it complies with all relevant Regulations, Codes of Practice, etc.

---Insert June H&S Policy Statement 2025---

5.0 Organisational Arrangements

This section sets out the general organisational arrangements which have been put in place to achieve the five main management principles of control, co-operation, communication, commitment and competence. These are set out within the Organisations management structure within the roles and responsibilities of Key Individuals as well as all the employees of Curo Enterprise Ltd.



6.0 Responsibilities

6.1 The Finance Director is responsible for the general oversight of health safety and welfare. He must:

- Ensure that the Safety Policy satisfies both legal and practical requirements in the prevention of risk, accidents and ill health and in the promotion of a safe working environment
- Ensure that the organisation is structured so as to meet the requirements of the Company's Health and Safety Policy
- Ensure compliance with the Company's Health and Safety Policy throughout the organisation
- Ensure that the processes and activities are planned and implemented in accordance with approved policy and standards
- Ensure that the policy is regularly reviewed and developed accordingly
- Ensure that proactive, reactive and investigatory mechanisms and systems are in place

6.2 The Board of Directors is responsible:

- For ensuring that a Safety Policy, Safety Management System and satisfactory Operational Team arrangements are in place
- For the allocation of resources for the management of health and safety

- To insure via the audit process that a Safety Management System is implemented in accordance with established standards and requirements

6.3 The Director with Responsibility for HS&E is responsible:

- For the production of an annual H&S Plan that sets objectives and targets for the business
- For safety matters within the operational and network sphere of operations
- For promoting and maintaining a high level of commitment for safe and sound operations throughout the business as a whole
- To ensure that risk assessments are carried out for all new project activities.
- To ensure appropriate training for those working on Curo Enterprise Ltd projects.
- For developing a system of worker participation and representation

6.4 The Head of Construction is responsible is responsible for:

- The operational organisation of all sites to ensure H&S compliance.
- The allocation of competent resources.
- Ensuring adequate programme time is allowed to achieve H&S compliance.
- Ensuring high levels of H&S compliance are achieved throughout all construction activities.
- Ensuring sub-contractor H&S is planned and allowed for (pre construction and construction).

6.5 The H&S Manager is responsible for:

- Ensuring a current H&S assurance and compliance auditing/Inspection programme is in place, managed and executed.
- Providing a review function for all construction SSoW/ RAMS.
- Ensuring H&S standards are achieved and surpassed throughout all construction activities.
- Maintaining a programme of worker consultation and engagement.
- Providing an 'onsite' H&S advisory function to the construction teams.

6.6 The External HS&E Adviser is responsible:

- For providing the Curo Enterprise Ltd.'s Board independent advice on all H&S matters
- For assisting in the formulation of Policy and Systems
- For providing advice on standards and compliance
- Promoting Industry best practice
- For providing Audits and Inspections on a as necessary basis

6.7 Employee Responsibilities

Every Employee must:

- Take reasonable care of the health and safety of themselves and others who may be affected by their acts or omissions at work
- Co-operate with their employer in complying with duties and requirements imposed by relevant statutory provisions
- Co-operate with their employer in complying with duties and requirements on health and safety matters imposed by management
- Not interfere with or misuse anything provided in the interests of health, safety and welfare
- Identify and report to their managers any unsafe acts or conditions

7.0 Risk Management

Curo Enterprise Ltd undertakes a systematic approach to the control and management of risks by having in place an effective organisation for health and safety, the commitment of Senior Managers and Directors, effective communication and co-ordination of efforts in promoting good practice in health and safety throughout the organisation and its Service Providers.

7.1 Hazard Identification

Hazard Identification is an essential step in risk control. In order to identify hazards the following information should be taken into account:

- Applicable legislation and supporting codes of practice
- Relevant local and international standards
- Industry or trade association guidance
- The personal knowledge and experience of Managers and Employees
- Accident, ill health and incident data from within the organisation, from other organisations or from central sources
- Expert advice and opinion

7.2 Risk Assessment

After hazards have been identified, Curo Enterprise Ltd assesses the severity of these hazards and the likelihood of their occurrence, i.e. assesses the risks. As a general rule Curo Enterprise Ltd concentrates on those risks which present the greatest severity, the occurrence of which may be very high, and where a large number of people are involved.

7.3 Risk Control

When the risks are analysed and assessed the control measures must be put in place. In doing so the following should be taken account:

- Minimum legal requirements
- Assessment of cost effectiveness
- Hierarchy of control which include:
 - Elimination of risk
 - Combating risks at source by engineering controls and by giving priority to collective protective measures
 - Minimising risk by design of suitable systems of working
 - Minimising risk by use of personal protective clothing and equipment

8.0 Co-Operation

Curo Enterprise Ltd encourages and promotes participation, commitment and involvement in health and safety activities at all levels in order to fulfil legal requirements and to achieve effective risk control.

Safety Representatives will be encouraged from any of our subcontractors or supplier organisations, subcontractors or suppliers will be supported in fulfilling their roles. Safety Representatives will be positively supported which, in common with all employees, enables them to make an informed contribution on health and safety issues. They must enjoy the positive benefits of an open communications policy and must be closely involved in directing the health and safety effort by the nature of their involvement within Curo Enterprise Ltd.'s undertakings.

9.0 Communication

Curo Enterprise Ltd understands the importance of effective communication within the organisation at all levels. This involves information entering the organisation, flowing within the organisation and going out from the organisation.

9.1 Information Coming Into the Organisation

Curo Enterprise Ltd appreciates that good internal communications are essential for the promotion of good health and safety practice. A comprehensive system of communication is established by using formal and informal means of communication, which ensures an adequate flow of information up, down and across the organisation.

9.2 Flow of Information from the Organisation

Health and Safety information is communicated outside the organisation when liaising with the Group and sub-contractor organisations or informing enforcing agencies of certain accidents and ill health data. Curo Enterprise Ltd is open, informative and presents information in a format that can be readily understood.

10.0 Safety Monitoring Systems

In order to ensure that health and safety performance meets predetermined plans and standards and to identify the need for remedial action Curo Enterprise Ltd carries out monitoring activities as part of its management commitment to health and safety objectives. Monitoring is a line management responsibility and these arrangements cover the whole range of health and safety performance standards which have been established within each operational team. There are two types of monitoring system:

- Active systems which monitor the achievement of objectives and the extent of compliance with standards; and
- Reactive systems which monitor accidents, ill health, incidents and other evidence of deficient health and safety performance.

11.0 Revision and Audit

Comprehensive reviews are made to provide an independent assessment of the validity and reliability of the H&S Policy and supporting Safety Management System.

Audits are carried out by competent people who are independent of the area or team activity being audited. These people will work singly or in teams and may be a combination of in-house or external resources. Those with auditing responsibilities will require specific training in this task to secure competence.

A system will be put in place to assess the following key elements of health and safety management:

- Policy – its intent, scope and adequacy
- The organisation, including:
 - The acceptance of health and safety responsibilities by Line Managers and the adequacy of arrangements to secure control
 - The adequacy of the arrangements to secure the involvement of all employees in the health and safety effort
 - The adequacy of arrangements to secure the communication of policy and relevant information
 - The adequacy of arrangements to secure the competence of all employees
- Planning and policy implementation including:
 - Overall control and direction of the health and safety programme
 - The standard setting- its adequacy and relevance
 - The allocation of resources to implement standards
 - The extent of compliance with standards and their effectiveness in risk control
 - The long term improvement in accident and incident performance
- Measuring systems- their adequacy and relevance; reviewing systems and the ability of the organisation to learn from experience and improve performance.