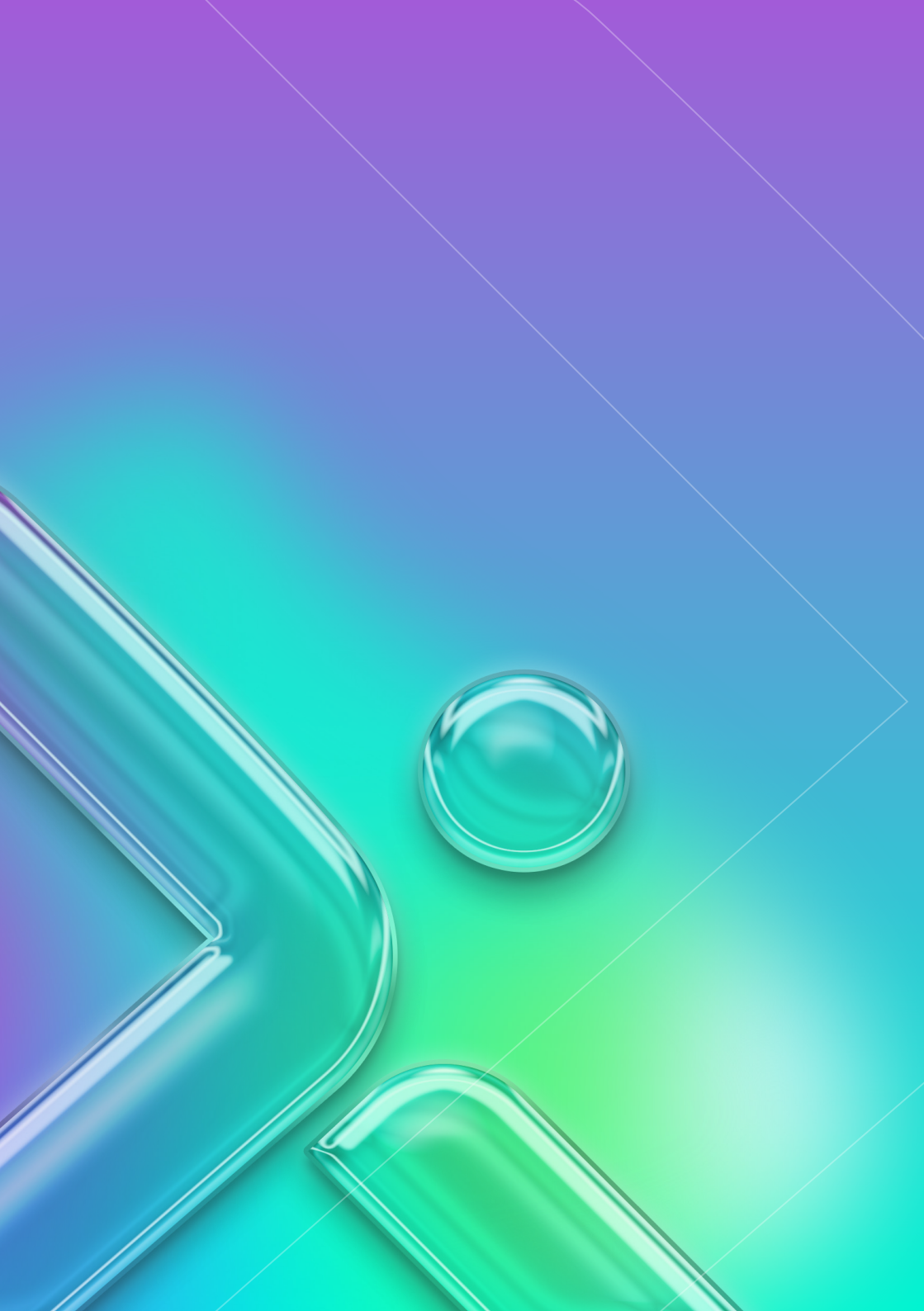


# HEALTH & SAFETY POLICY



PRIORITISE  
SAFETY



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# CHIEF EXECUTIVE'S INTRODUCTION

Prioritising Safety is a core value of Nexora. Nothing we do is so important that it cannot be done safely, every time.

Our goal is zero accidents and we must all make sure that we do not put ourselves, colleagues, contractors, customers or the wider public at unnecessary risk.

Excellence in Health & Safety is good for business and supports Nexora's strategic objective of building a successful and sustainable business over the long term.

Nexora is responsible for ensuring that our employees and those working on our behalf go home safe and well every day. To meet this responsibility, we will:

- As a minimum, comply with all applicable regulatory requirements and operate in accordance with industry codes of practice relevant to our businesses
- Demonstrate the necessary leadership and provide sufficient resources to embed H&S considerations into business decision making at all levels
- Implement effective H&S management systems and challenge ourselves to continually improve our performance by learning from events and adopting best practice
- Look for innovative approaches to strengthen behaviors using appropriate communication programs and engagement tools.
- Work with contractors and other stakeholders to ensure all H&S risks are appropriately managed
- Foster an open culture that promotes engagement at all levels in the Nexora Community

If you are in any doubt about our H&S standards, always ask. If you have a concern, always raise it. You will always be supported for doing the right thing.

**Clive Fitzharris**  
CEO, Nexora



## WHO DOES THIS POLICY APPLY TO?

This Policy applies to all Nexora community businesses (Nexora Community) and every business in which Nexora has a controlling interest.

All references to “Nexora”, “the business”, “community”, “we”, “us”, and “our” in this Policy can be read accordingly.

## WHAT ABOUT OTHER POLICIES AND PROCEDURES OR OTHER REQUIREMENTS?

This Policy supports Nexora’s devolved, autonomous business model by providing a high-level framework in which Health & Safety management systems continue to be developed and managed at subsidiary level.

More detailed policies, procedures and standards will be in place, whether across the Nexora Community, within individual subsidiaries or at third party sites. These operate in addition to this Policy: they add detail to the general principles set out here.

In some countries where we do business the law may have additional requirements to those set out in this Policy. If that is the case, then the legal requirement must be met. We must always work within the law.



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## WHAT IS EXPECTED OF MANAGEMENT?

Directors and senior managers are accountable for H&S performance in the activities they direct and must:

- Have a clear understanding of this Policy and work to ensure it is implemented in both letter and spirit.
- Lead by example – always follow safety rules and raise a concern if something is unsafe.
- Actively engage with our safety value and principles.
- Recognise good H&S performance by employees.
- Ensure H&S implications are considered in objectives setting and decision making processes within the business.
- Support a learning culture to continuously improve H&S performance.

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## WHAT HAPPENS IF I DO NOT FOLLOW THIS POLICY?

Those who do not follow this Policy are subject to disciplinary action, up to and including dismissal. Examples of behaviour that may result in disciplinary action include:

- Deliberately breaching this Policy.
- Asking or encouraging others to breach this Policy.
- Failing to report a clear breach of this Policy.
- Retaliation against a person who has raised a concern.

Directors and senior managers are reminded that in many jurisdictions, significant criminal sanctions may apply to individuals in the event of a breach of H&S regulations.

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# GOVERNANCE

## A. Management and Reporting

Managing Directors are accountable for H&S performance in their businesses. Performance metrics and commentary on significant H&S matters will be included in monthly reports at all levels of the Nexora community businesses (Nexora Community). Qualitative and quantitative metrics will be aligned with the Expectations set out in this Policy to assess the trends in performance against desired outcomes.

## B. Assurance

Three levels of assurance are provided; business level audits, Nexora H&S audits and external audits by regulators and other independent organisations. Community H&S audits will be completed to assess performance against this Policy, including the Expectations set out in the following pages. Audit actions raised will be monitored to ensure effective completion.

## C. Development

The Policy provides a framework for the determination and development of H&S standards within the Community. Standards can be technical in nature or define a best practice for carrying out a specific management activity.

Working Groups, drawing on internal and external expertise, meet regularly to share best practice, learn from events and develop standards in specific risk areas including process safety, transport safety and occupational health & safety.

A Steering Group oversees the activities of the Working Groups, including prioritisation of work streams and objectives.

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# VALUES AND BEHAVIOURS

At Nexora, our values are more than words. They're how we work, lead, and grow:

## People Powered

Our people make the difference: we support, empower, and lift each other.

## Progressive

We never stand still. We embrace innovation, curiosity, and change.

## Partnerships

We go further, together. Collaboration and trust are our advantage.

## Positive Impact

We act with purpose: creating value commercially, socially, and sustainably.

## Prioritise Safety

We protect what matters most: our people, our planet, and our future.

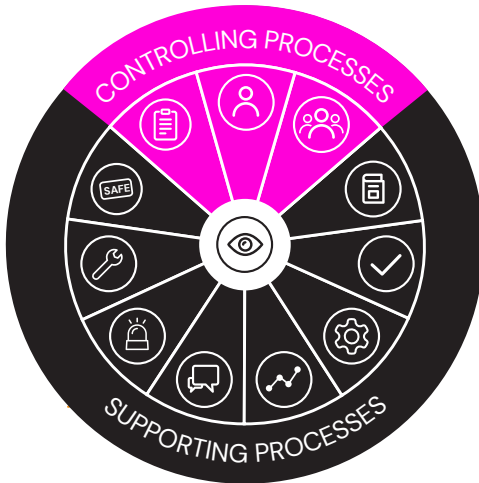
# EXPECTATIONS

Every Health & Safety management system follows a similar structure, often based on national, regional or international requirements.

The key processes in any H&S management systems are set out under twelve Expectations in this Policy. Business H&S management systems will be aligned to meet these Expectations.

Central to these Expectations is Risk Management for identifying, assessing and controlling H&S risks in the business. Surrounding Risk Management are three controlling processes and eight supporting processes.

The figure below provides a graphical representation of the Expectations.



**1. Leadership & Commitment**



**2. Planning, Organisation & Communication**



**3. Risk Management**

- Identify
- Assess
- Manage
- Demonstrate



**4. People, Training & Competency**



**5. Compliance & Knowledge**



**6. Engineering & Project Management**



**7. Operations & Performance**



**8. Learning From Events**



**9. Emergency Preparedness**



**10. Asset Management**



**11. Contracted Services**



**12. Audit & Review**



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## **EXPECTATION 1: LEADERSHIP & COMMITMENT**

**Management will provide visible and active leadership in developing and maintaining a supportive culture.**

- H&S goals and objectives will be identified, documented and communicated throughout the organisation.
- Management within each business will be clearly accountable for H&S performance, including the achievement of the identified goals and objectives.
- Management will demonstrate their commitment through their behaviours and actions.

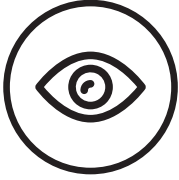


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## **EXPECTATION 2: PLANNING, ORGANISING & COMMUNICATION**

**The organisation  
and responsibilities  
for H&S  
management  
will be defined  
and documented.**

- H&S management systems will be clearly documented to ensure business processes and plans are communicated and understood.
- Structured management and group meetings will be used to communicate plans, actions and performance.
- Action tracking systems will be used to record actions and monitor progress to completion.
- Resources will be regularly reviewed to ensure they are adequate to achieve H&S goals and objectives.



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## EXPECTATION 3: RISK MANAGEMENT

**Hazards will be identified, the risks assessed and appropriate controls implemented.**

- Formal processes will be established to identify the health, occupational safety and process safety hazards arising from current or proposed operations.
- Appropriate risk assessments will be performed and documented to identify risk control and mitigation measures.
- Risk assessments will consider the hierarchy of controls and where practicable preference will be given to inherently safer options (e.g. elimination, reduction) over those that need technical or procedural controls.
- Risk control and mitigation measures will be defined and documented.
- The risk control and mitigation measures will be monitored to ensure that they are functioning and effective.



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## **EXPECTATION 4: PEOPLE, TRAINING & COMPETENCY**

**People will be selected, trained and developed to carry out their duties competently.**

- Processes and systems will include the means to identify required H&S accountabilities and competencies for employees, and will ensure that recruitment processes consider these requirements.
- Employee inductions will include H&S topics.
- H&S competence and capability of personnel will be developed and maintained using continuous training and development programmes.

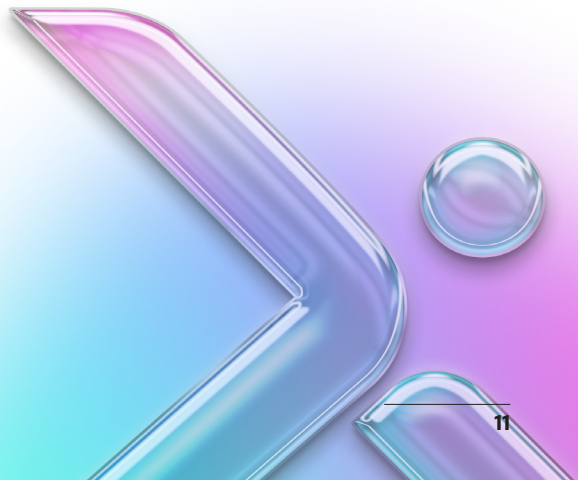


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## **EXPECTATION 5: COMPLIANCE & KNOWLEDGE**

**Relevant managers will have access to the knowledge needed to effectively deliver compliance with relevant H&S legislation and regulations. Key information will be identified and organised for retention and retrieval.**

- Processes will be established to ensure that the business remains informed of relevant legislative and internal requirements, codes, standards and regulations relating to H&S.
- A document control system will be established to manage key documents and records throughout their life cycle.
- Retention policies will be defined for key documents and records.





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## **EXPECTATION 6: ENGINEERING & PROJECT MANAGEMENT**

**Facilities will be designed, constructed and maintained to meet relevant codes of practice, applicable standards, operational needs and regulatory requirements.**

- A management of change procedure will be documented to cover organisational, technical and procedural changes which occur in a business due to a significant project or development.
- Project management procedures will be documented to cover the entire project management life cycle.
- Technical standards will be used to ensure that engineering changes and projects comply with the specific needs of the local conditions and with regulatory requirements.





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## **EXPECTATION 7: OPERATIONS & PERFORMANCE**

**All activities will have relevant, safe, secure and precautionary systems of work defined. Performance indicators will be established.**

- Operating procedures will be developed and maintained with appropriate employee input. Procedures will be clear, concise and consider abnormal and emergency situations.
- Safe operating limits of equipment will be defined and documented in operating procedures.
- Key H&S performance indicators, both leading and lagging, will be developed and monitored at subsidiary and divisional level.



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## **EXPECTATION 8: LEARNING FROM EVENTS**

**Events will be reported and analysed to establish underlying root causes and prevent recurrence. The findings and recommendations of investigations will be communicated as appropriate to ensure the learning is shared.**

- A process will be defined to ensure that all events (including near misses, unsafe acts and unsafe conditions) are consistently reported and investigated based on their potential outcome.
- An end to end system will be in place to ensure root causes are identified, corrective actions taken and wider learnings communicated to support continuous improvement in H&S management systems.

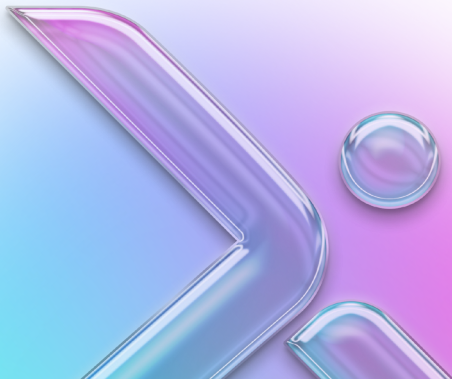


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## **EXPECTATION 9: EMERGENCY PREPAREDNESS**

**Arrangements will be made to ensure that sufficient resources are available to effectively manage and recover from emergencies and crisis situations.**

- Emergency response plans that consider events or crises with on and off-site impacts will be established and aligned with wider business continuity management plans.
- Emergency response plans will be tested to assess their effectiveness and updated as necessary.
- External bodies and agencies will be consulted during development of emergency response plans where their involvement may be required.





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## **EXPECTATION 10: ASSET MANAGEMENT**

**Maintenance programmes will be established to ensure that physical assets are maintained in a condition appropriate to meet operational integrity requirements.**

- Asset registers will be established and kept up to date for each facility.
- Where applicable, process safety and safety critical devices and equipment will be specifically identified in the register.
- Policies, practices and procedures will be defined to ensure that assets are acquired, installed, maintained and inspected such that they are able to deliver the required operational and safety performance over their lifetime.
- Inspection programmes will consider the frequency and depth of inspection to reflect the risk associated with the equipment and to meet regulatory requirements.
- Procedures will be established for the eventual divestment or disposal of assets to ensure that any potential legacy issues and risks are addressed.



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## EXPECTATION 11: CONTRACTED SERVICES

**Contracted services will be managed to ensure that contractors deliver an acceptable level of H&S performance.**

- Systems will be established to ensure the effective management of contractor operations, including assessment, engagement and assurance.
- Only approved contractors will be used for any work which may have an impact on H&S standards and performance.





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## EXPECTATION 12: AUDIT & REVIEW

**Audits and reviews will be performed to assess the effectiveness of the management system and to identify areas for improvement.**

- Senior management review meetings will be held periodically to examine the effectiveness of the H&S management system.
- A risk based audit programme will be established to ensure that all processes and procedures are examined at appropriate intervals.
- H&S performance will be assessed both qualitatively and quantitatively.
- Continuous improvement plans will be developed, based on performance outcomes.

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# QUESTIONS OR CONCERNS

If you are unsure about how to apply this Policy in practice, please contact Nexora's Health, Safety & Sustainability Director, Liz Hancock at [Liz.Hancock@nexora.eu](mailto:Liz.Hancock@nexora.eu)

For more information on how to raise a concern please refer to the Nexora Code of Conduct.

You will be supported if you raise a concern about a breach of this policy. Retaliation against a person who raises a concern is prohibited.

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# LEADERSHIP TEAM



**Clive Fitzharris**  
*CEO, Nexora*



**Liz Hancock**  
*Health, Safety &  
Sustainability Director,  
Nexora*



**Troy Draper**  
*President  
North America,  
Nexora*



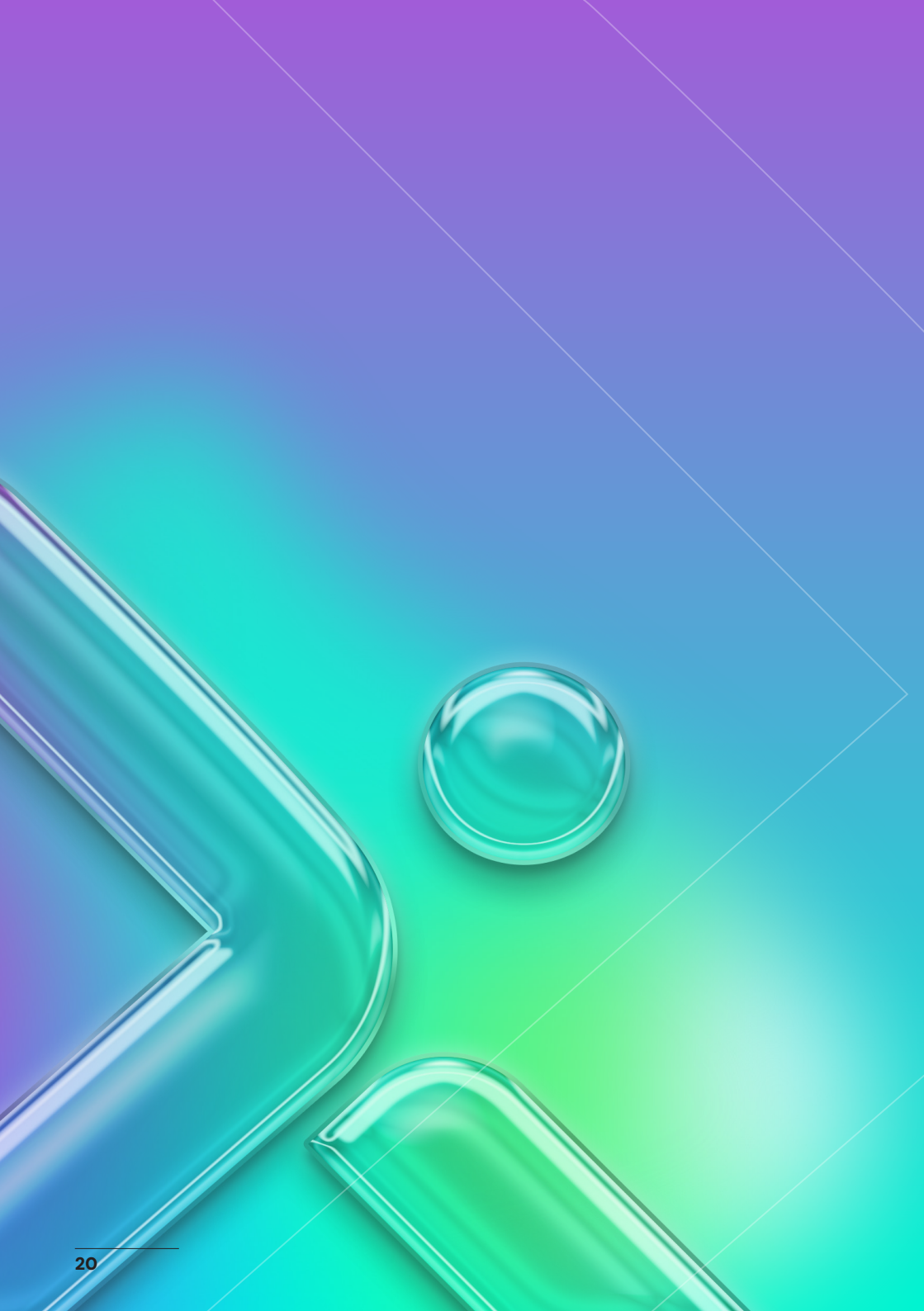
**John Dunne**  
*Managing Director  
Western Europe, Nexora*



**Jason Chibnall**  
*Managing Director,  
Hammer Distribution*



**Jona Silander**  
*Managing Director,  
Captech*



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