



Global Health and Safety Policy



Page Group Global Health and Safety Policy Statement of Intent

The Group Plc Board is committed to protecting the health, safety and well-being of its employees, contractors, visitors and anyone else who comes into contact with our operations worldwide. Furthermore, we support local legislation requirements where relevant, such as temporary staff placed at client locations.

We recognise that a positive health and safety culture not only safeguards people and property, and protects the business from reputational harm, but also enhances the performance of its employees.

Our aim is to ensure that all activities and people in each of our businesses adhere to this policy as a minimum and comply with relevant legislation in the countries in which we operate. If there is ever conflict between local legislation and our Group minimum standard, the Regional Finance Director and the Head of Risk reporting shall be informed.

A safe and healthy business environment is important to the long-term sustainable growth of our company; therefore, our commitment to health and safety worldwide includes:

- providing safe and healthy working conditions for the prevention of work-related injury and ill health.
- fulfilment of relevant legal and other requirements.
- so far as is reasonably practicable, eliminating hazards and reducing health and safety risks.
- ensuring development, implementation, and continual improvement of the health and safety management system.
- ensuring consultation and participation of workers on health and safety matters at all hierarchical levels.
- making available sufficient resources in order that effective health and safety processes can be implemented.
- ensuring through our code of conduct and our policies that all employees understand their responsibility for maintaining a healthy and safe working environment.
- all PageGroup employees at all levels are encouraged to adopt a proactive and co-operative approach towards health and safety.

Responsibilities for ensuring we have a safe environment have been agreed by the Board and are outlined in the Group Health and Safety Policy. Additionally, regional/local policies and procedures outline individual responsibilities to enact this policy, and to help develop and maintain a positive health and safety culture throughout the Group.

The Group Health and Safety Policy provides a guideline of the areas to be addressed and sets out the standards that should be applied in each; furthermore, it provides a framework for setting health and safety objectives. The specific activities to adhere to these standards and achieve our objectives are determined on a regional and country basis and applied considering local legislative requirements.

CEO: Nicholas Kirk

Signature: 

Date: 9th January 2023

To be displayed in all PageGroup office locations.

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SECTION 1 – OVERVIEW

This Global Health and Safety Policy sets out PageGroup’s approach for managing health and safety within our business. Additionally, local countries have their own policies and procedures to conform with applicable laws and regulations. Employees can obtain further information from:

- a. Local office managers or business support co-ordinators
- b. Line Managers
- c. Regional Safety Managers/Directors, where applicable
- d. Online via the policies directory, intranet or Yammer

All PageGroup employees are required to read, understand and adhere to this policy and are encouraged to work with management to help develop a robust health and safety culture, and adopt a proactive and co-operative approach towards it.

Objectives

To provide and maintain a safe and healthy workplace environment and ensure that significant risks arising from our operations are eliminated or suitably controlled.

To establish and maintain a positive health and safety culture worldwide.

To develop and implement appropriate health and safety procedures and safe working practices.

Ensure all employees are provided with suitable and sufficient information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, their health and safety at work.

Scope and Application

This Policy applies to all PageGroup business activities worldwide:

- a. All office locations
- b. All employees when on company business.
Legal advice should be sought as to the status of temporary workers on our payroll based at clients’ premises as to who has responsibility; this will vary by country. If we are responsible, we should treat them as we would employees.
- c. All employees when travelling on approved company business (See local business travel process).
- d. All employees when engaged in company sponsored and arranged social, sporting or charitable events (See local events management process).

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SECTION 2 – RESPONSIBILITIES FOR HEALTH AND SAFETY

Executive Board	CEO	The CEO is ultimately responsible for PageGroup health and safety, reporting to the Group Board on health and safety matters.
Regional Executive Management	Regional MD/Regional FD	Are responsible for nominating suitably competent persons under their management to take accountability for the day-to-day management of health and safety and to ensure appropriate budget is available.
Regional/Safety Management	Competent Person(s)	Are directly responsible for the conduct of health and safety matters in their region. To ensure that processes are in place to support compliance with any local legislation and Group Policy standards.
Office management	MD/Office manager	Should ensure their locations remain safe places to work supporting line management in creating a healthy and safe working environment.
Line manager	Manager	Should ensure employees are aware of health and safety requirements and act in accordance with the policy.
Employees	Employees	All employees should act in a way to ensure both they, their fellow employees and any visitors remain safe. See employee safety code of conduct.

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SECTION 3 – GROUP ARRANGEMENTS FOR HEALTH AND SAFETY

Introduction

The Group has outlined its Health and Safety Management standards and arrangements that form our minimum groupwide requirements.

Additionally, countries/regions develop and implement their own management arrangements to conform with local laws and regulations. Our governance processes will monitor our activity against these standards.

Principles of Health and Safety

As part of its commitment to the health, safety and wellbeing of its employees, PageGroup has the following key health and safety principles:

- a. **Assess.** Ensure you understand which health and safety risks you have. See below for guidance on areas that should be considered, assessed and mitigated so far as is reasonably practicable
- b. **Inform.** All staff will be informed of the Group Policy and those assigned specific Health and safety responsibilities will be appropriately trained
- c. **Monitor.** Monitor and report on key aspects of health and safety performance (see reporting, for example, accident recording).
- d. **Improve.** Assess the company's performance in health and safety matters and enact improvements as and where necessary.
- e. **Cooperate.** Engage with service providers to ensure that their health and safety policies and procedures align with PageGroup's and that any actions or omissions on their part do not jeopardise the success of this policy.
- f. **Document.** Ensure that we can validate that the above steps have been appropriately taken.

General Arrangements for the Management of Health and Safety

Law, Standards and Guidance. Each location will at a minimum comply with the approved health and safety codes of practice and associated legislative requirements of its operational countries. A nominated individual will have access to the most relevant and up-to-date information for each country, so they can ensure that the company's processes and procedures in their area of responsibility are and remain compliant.

Health and safety Reviews. (*We should discuss health and safety at local Boards at least twice per annum*). The fact that health and safety has been considered should be formally noted and any decisions or actions documented.

Communication. The Global Health and Safety Policy Statement of Intent and any applicable regional documents e.g., Policy, Employee Code of Conduct, and Risk Assessments, shall be made available to all employees, both when they join the business as part of our induction process and then on an ongoing basis (usually annually, or at a point of significant change). The documents can be shared via local noticeboards and whatever Groupwide electronic media is available e.g., Yammer, intranet, e-learning, or shared directories. This should be done by the 'competent person' who may also be the Office Manager.

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The PageGroup Health and Safety Policy shall be communicated in full to all the PageGroup Directors and made available to all employees. Breaches of this Policy will be dealt with in accordance with local disciplinary policies and procedures.

Employees are encouraged to contact their local HR department, or the Group's speaking up helpline, if they feel there is a health and safety hazard or risk which is not being addressed and they do not want to raise this with their local health and safety manager.

If at any point the most senior regional individual has any doubts, concerns, or ideas to improve this Policy, or questions about local legislative requirements and any activity being undertaken, guidance should be sought from their manager, Office Manager, the Regional Safety Manager, local consultancy, or the Head of Risk Reporting.

Risk Assessments. PageGroup uses various risk assessment methodologies to control hazards undertaken on and off its premises.

Generic risk assessments are undertaken to ensure the main hazards and risks within the business are identified and suitably controlled. Records are held by regional safety and office management. Site and task-specific risk assessments are undertaken to control higher risk activities.

Risk assessments are at a minimum reviewed annually or when there are significant changes in operations which make it necessary for an earlier review to be conducted. Regional safety and office management are responsible for ensuring that the required actions are undertaken.

Temporary workers. Temporary workers working for PageGroup are treated the same as any other employee would be.

In the case of temporary workers placed by PageGroup at clients', we need to ensure that we are compliant with local legislation; Australia, for example, places additional responsibilities on the service provider; therefore, we must ensure that we are compliant with the laws and corresponding guidelines with a to ensure good practice in the industry.

Contractors. Each location will ensure that only competent contractors are employed to complete work on the company's behalf. They will be appropriately inducted, including being informed of the company's health and safety Policy, emergency arrangements, and any actual or potential hazards in the areas that they visit.

Visitors. Locations will ensure the health and safety of visitors and members of the public. They are to be informed of the company's health and safety arrangements and any relevant hazards in the areas that they visit. All visitors should be signed in and out of site and/or always accompanied by an employee.

Internal Audit. PageGroup internal auditors to periodically inspect and assess the status of regional health and safety compliance.

Actions are raised as part of the audit which are referred to Senior Regional Management; corrective measures are implemented and monitored to ensure they're suitable and sufficient before being closed.

First Aid. All company locations are required to have someone with nominated responsibility for first aid and will make first aid supplies available. Details of first aiders and location of supplies should be made available to all employees, and where required by legislation displayed on noticeboards.

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Accident and Incident Reporting. The investigation and analysis of work-related accidents and incidents forms an essential part of managing health and safety, including preventing reoccurrences from lessons learned. In order to ensure effective management of occurrences PageGroup has established the following reporting requirements:

Occurrence Type	Example	Reporting Action
Incident: Near Miss. An event not causing harm but has the potential to cause injury or ill health.	Employee trips on a broken stair tread but doesn't fall and doesn't suffer an injury	Local reporting and investigation if required by legislation
Incident: Undesired Circumstance. A set of conditions or circumstances that have the potential to cause injury or ill health.	Employee spots a broken stair tread that could pose a trip hazard. Or an untrained person undertaking maintenance work	Local reporting and investigation if required by legislation
Accident. An event that results in injury or ill-health	Employee trips on a broken stair tread, falls and sprains ankle	Local reporting and investigation if required by legislation
Significant. An event that results in injury or ill-health resulting hospital/medical treatment, or time of work for a week or more.	Employee trips on a broken stair tread, falls, suffers concussion or sustains non-life changing injury(ies).	Local reporting and investigation. Regional HR & Health and Safety Representative informed
Severe. An event that results in major life-changing injury, ill-health or fatality(ies).	Employee trips on a broken stair tread, falls, breaks spine and is confined to a wheelchair pending further treatment	As above and inform Group Human Resources Director at the earliest opportunity (and immediately if the occurrence involves a death)

Where local legislation specifies additional reporting requirements, these must be adhered to.

Housekeeping. Effective housekeeping is important to ensure a safe working environment. The accumulation of combustible materials and clutter shall be controlled through appropriate housekeeping. Additionally, waste is removed frequently and work equipment, including stationery, deliveries etc. should be stored appropriately. Managing Directors throughout the business will work with Office Managers, the Facilities Team and other relevant employees to develop a clean and tidy office culture.

Emergencies. Each office shall have Emergency Evacuation Plans to ensure employees know where their nearest fire exits and assembly points are and what the country emergency contact number is. Evacuations shall be practiced in line with local legislation or at least once per year. Instructions shall be made available to

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new employees on their first day as part of their induction and where reasonable/necessary to visitors and temporary workers. Consideration should be given to employees or temporary workers who require further assistance e.g., have a temporary or permanent mobility impairment. Offices shall test their fire alarms on a regular basis in line with local legislation if applicable, or at a minimum monthly.

Additionally, regional health and safety and office management shall implement country-specific emergency plans, which may include what to do in the event of a power failure, bomb or terror threat etc. These procedures shall be communicated regionally, and employees shall be suitably trained.

Training. As relevant, and in accordance with risk assessments, employees will be given suitable and sufficient training so as to reduce so far as is reasonably practicable the risks associated with their roles. Specifically, this may include health and safety induction, display screen equipment (DSE), fire safety training, or manual handling training. Such training is to be recorded and reviewed on an appropriate periodic basis. Employees are required to co-operate with the company and attend necessary training.

Safe and Healthy Working Environment. Each office, so far as is reasonably practicable, is required to implement suitable and sufficient measures to design, maintain, and procure appropriate plant and equipment to ensure a good standard of health and safety, which mitigates the likelihood of work-related injuries and ill-health.

Working from Home. Where employees work from home, either on a permanent basis or occasionally, they are required to ensure that they have an appropriate working environment, including workstation equipment.

Employees who are contracted to work from home on a permanent basis shall discuss, assess, and document with their line manager their homework environment. Where areas/considerations are identified the employee should be supported with remedial action.

Employees with an office-based contract should ensure that their homework environment is suitable. If they have any concerns, they should discuss these with their manager. **Managers and employees should ensure that they comply with any specific local legislation on home working.**

Business Travel. Where employees travel for business reasons, the travel arrangements should be made through reputable carriers and travel service providers.

When employees travel to Overseas PageGroup locations they should seek guidance from local management e.g., do's and don'ts, including use of public transport and travelling around at night.

A record should be maintained of all employees on overseas travel so that in the case of emergency they can be contacted, or support provided as necessary.

Where we have no local representatives then management should discuss the most sensible approach.

It is recommended that wherever possible teams do not travel together.

Driving on Company Business. Where company cars are provided there should be a documented policy covering health and safety matters made available to all company car drivers. Additionally, where employees use their own vehicles, they should be appropriately maintained and conform to local legislative requirements, for example, in United Kingdom, hold a current MOT certification and appropriate business insurance. The company should ensure that drivers are appropriately insured and verify they are qualified to drive.

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Staff Events. Managers must include health and safety as part of the planning of company sponsored or company arranged events. This includes motivational trips and charitable events. It is important to remember that the company has a duty of care towards its employees when they are attending such activities. For events supported by a third party, we should satisfy ourselves that they have performed a risk assessment, hold suitable insurances, and are taking appropriate precautions to ensure health and safety. Documentation should be maintained to verify that we have performed the above reviews. See separate regional guidelines on events management (See local process on events management).

General Arrangement for the Control of Specific Hazards

Fire Safety. PageGroup adopts the common five universally applicable international principles for fire safety management. In all stages of the building's life cycle, sufficient measures shall be taken to implement the following:

- a. **Prevention** – Safeguarding against the outbreak of fire and/or limiting its effects
- b. **Detection and Communication** – In accordance with the building emergency procedures, investigation and discovering fire, followed by informing occupants and the fire service, where appropriate
- c. **Occupant Protection** – Facilitating occupant avoidance of and escape from the effects of fire
- d. **Containment** – Limiting of fire and all of its consequences to as small an area as possible
- e. **Extinguishment** – Suppressing of fire and protecting of the surrounding environment

Additionally, regional office management is required to ensure that they conform to the applicable fire safety legislation.

Display Screen Equipment. Office workspaces shall be designed and provided with suitable ergonomic equipment to minimise the risks associated with Display Screen Equipment (DSE) use. Regional office management is required to conform with local legislation, for example explicit training, and ensure that equipment is inspected and replaced when necessary.

Hazardous Substances. The use of any hazardous substances will be regulated and appropriately controlled to ensure that exposure to them is minimised and that they are only used where required by competent persons. Hazardous waste is to be handled and disposed of in accordance with local legislation and industry best practice.

Mental Health and Well-being. PageGroup is committed to enhancing its workplace culture where people can confidently discuss their issues and is proud to be recognised as an inclusive employer. PageGroup employs a diversity, equity and inclusion team (DE&I) who strive to put our employees' health and well-being first and support various global initiatives and localised events.

Infectious and Bacterial Diseases. We are committed to mitigating the potential consequences of an infectious or bacterial outbreak, for example Coronavirus (COVID-19), flu, monkeypox etc. Regional Senior Management shall ensure suitable policies and procedures are implemented in accordance with localised guidance, to control spread and protect the health of our employees.

Water Management. Appropriate water management and risk control is required to mitigate the likelihood of a legionellosis (collective term for diseases caused by legionella bacteria) outbreak. Regional office

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management in accordance with the building management are required to comply with local water management legislative requirements and control methods.

Smoking. Smoking, including e-cigarettes, is prohibited inside offices, except where allowed within suitably designed and designated smoking areas.

Personal Protection. Suitable personal protective equipment (PPE) is to be made available where appropriate and identified as the result of a suitable and sufficient risk assessment to help protect employees from reasonably foreseeable risks. Examples include where staff are working in the property and construction discipline visit a building site, or a one-off event such as a pandemic where staff welfare is at higher risk

Asbestos. Asbestos causes significant acute and chronic ill health, including serve cancers. Therefore, Asbestos importation and use has been widely banned globally; however, there are noticeable exceptions, including the United States. Regional executive, health and safety and office management shall implement country-specific asbestos management controls, ensuring so far as is reasonably practicable, that PageGroup employees are not exposed to the hazardous substance.

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SECTION 4 – DOCUMENT CONTROL

Document Name	Group Health and Safety Policy
Document Number	GP/FM/16/001
Document Owner	Paul Kaczmar, Head of Risk Reporting
Responsible Department Head	Regional H&S Manager
H&S Qualified document editor	Andy Clarke
Summary of Purpose	To define the company's policy and standards towards health and safety and ensure that all areas of the business adhere to them.
Date of Approval	January 2023
Version Number	1.4
Review Frequency	Annually or when there is significant change
Next Review Date	January 2024
Reference Documents	Employee Handbooks Supplier Code of Conduct
Distribution	Chief Executive Officer Chief Financial Officer Executive Board Directors Global Human Resources Director Chief Information Officer Regional Finance Directors Regional HR Directors Regional and Senior Managing Directors Country MDs Regional Safety managers/Directors Intranet/Yammer (for the attention of all employees)