

# Health and Safety Policy

**Garda Sikring Group**

**Policy Owner:**

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**Policy Version: 1.2**

This Policy will be reviewed and updated annually.

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## 1. Policy Statement, Scope and Principles

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This Policy is globally valid and applies to all entities of Secure HoldCo AS (“Garda Sikring Group”, “the Company” or “we”). It is publicly disposed and incorporated in Garda Sikring Group routines and clearly communicated internally and externally.

It is the policy of the Garda Sikring Group to ensure, so far as it is reasonably practical, the health and safety at work of all its employees, contractors and visitors, in accordance with the relevant statutory requirements and corporate best practice. The Company also accept its responsibility for the health and safety of other people who may be affected by its activities. Consideration is given to ensure suppliers and contractors’ provision for safety is compatible with that of the Company.

All employees of Garda Sikring Group are expected to follow this policy. The objective of this health and safety statement can only be achieved through the support and cooperation of all employees. It is therefore the responsibility of all employees, to ensure that by their activities or behaviour, they do not knowingly create hazards for themselves or others.

This Health and Safety Policy describes the management commitment to Health and Safety in all Garda Sikring Group operations. It sets the framework for local objectives, target setting and decision making in the management system processes. Compliance with this Policy is mandatory for all employees and anyone working on our behalf.

Security and openness are fundamental Garda Sikring Group values which must be respected and upheld. The Company’s overarching commitment is to ensure decent working conditions and provide a healthy and safe working environment free from accidents and work-related illness at our offices, at client’s offices, in the field, in business travel and at project sites. This also includes a safe and healthy workplace from a physical, emotional and mental well-being perspective.

Garda Sikring Group shall:

- Provide and maintain equipment and places of work that are safe and without risk to health.
- Provide as necessary, information, instruction, training and supervision that is required to ensure health and safety at work of its employees.
- Encourage staff to set high standard of safety, and to foster a culture which embeds safety practices as the norm.

The Company’s appointed Health and Safety Manager is responsible to advising the organisation on all matters relating to health and safety, and to oversee the implementation of this policy.

To ensure this policy, and the way in which it operates, is kept up to date, it will be subject to an annual review.

## 2. Responsibilities

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It is essential that the effective management of health and safety is recognised as an integral part of the overall management of Garda Síking Group. Therefore, responsibilities have been allocated to all employees within the Company.

### ***2.1 The Board of Directors shall ensure that:***

- A Health and Safety Policy is in place that supports effective occupational health and safety arrangements.
- Adequate resources are made available to meet the requirements of the Health and Safety Policy.
- All necessary statutory and regulatory records are available.
- Key staff are appointed in writing, to undertake specific duties to comply with the Health and Safety Policy and all applicable requirements.

### ***2.2 Health and Safety Manager shall:***

- Maintain a broad understanding of the Health and Safety Policy related procedures, and those statutory requirements that may affect the Company's activities.
- Ensure the Board of Directors are made aware of health and safety matters within Garda Síking Group and provide guidance to the Board of Directors.
- Ensure information relating to Garda Síking Group's safety performance is collated for presentation to the Board.
- Undertake health and safety assessments, inspections and audits.
- Ensure health and safety recommendations from inspection, audits and accident investigations are implemented to prevent a recurrence.
- Distribute resources necessary to satisfy occupational health and safety requirements.
- Engage a Competent Person as a focal point for liaison with enforcing authorities and other external bodies.
- Authorise changes to the Health and Safety Policy Statement.

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### ***2.3 The Group HR Director shall:***

- Maintain a broad understanding of Garda Síking Group's Health and Safety Policy and procedures, and those statutory requirements that may affect the Company's activities.
- Inform the necessary authorities of reportable injuries and diseases.
- Ensure all employees receive Induction Training that includes health and safety information.
- Provide guidance on training needs, when requested.
- Oversee driving license checks.
- Coordinate eye site / vision checks.
- Ensure all appropriate statutory and regulatory records relating to health and safety are maintained.

### ***2.4 CEO of Sub-Entities shall:***

- Be responsible for the compliance of the Health and Safety Policy in the sub-entity.
- Be responsible for compliance with local, national and international statutory regulations in relation to health and safety are complying.
- Work with the Health and Safety Manager to ensure that adequate resources can be provided to the Company's core activities.

### ***2.5 Divisional Manager, Operational Directors and Project Managers shall ensure that:***

- They understand the Company's Health and Safety Policy and related statutory requirements.
- The workplace(s) under their control are compliant with the Company's Health and Safety Policy arrangements.
- They manage all safety aspects of employees under their control.
- Any health and/or safety recommendations from inspection, audits and accident investigations are implemented as to prevent a recurrence.
- All employees have received suitable and sufficient induction.
- Candidate and visitor health and safety requirements have been considered while on Company premises.
- Out of hours visitor have signed-in.
- Suitable first aid provision is available during normal working hours.
- They cooperate with the Health and Safety Manager (or Local Representative) to achieve the aims of the Health and Safety Policy and act on any recommendations that may have been made.

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## ***2.6 Occupational Health Services shall:***

- Support the Sub-Entities to ensure that physical and mental health are assessed and considered.
- Support the Sub-Entities with implementation of actions to promote physical and mental health.

## ***2.7 The local Health and Safety coordinator (Employee Safety Representative) shall:***

- Work with the Health and Safety Manager to ensure that adequate resources can be provided to the Company's core activities.
- Undertake site specific risk assessments prior to works commencing and communicating or implementing suitable control measures.
- Liaise with Clients' Safety Representative (where necessary) to verify suitable workplace arrangements have been implemented.
- Co-ordinate and supervise health and safety support under their control, gather feedback and identify trends.
- Advise on recommendations for the continuing development of the Company's Health and Safety Policy and participate in safety reviews as requested.
- Provide appropriate safety input to the tender process as required, this may include responses to requests for Information, assessment of risks at bid stage, providing appropriate advice to Marketing/Communication.
- When requested, provide appropriate safety input to the procurement process.
- Promote the provision of adequate resources and competencies, to achieve the required health and safety performance within the business. This is to include assisting in the promotion, development, organisation and delivery of health and safety training instruction.
- Ensure that accident and incident investigations are properly carried out to identify both immediate and underlying causes. Collate, analyse and report on such data and promote actions to prevent recurrence.
- Oversee the coordination of reportable injuries and diseases.
- Advise and assist all appropriate managers in discharging their responsibilities for health and safety of employees and others to whom they have a duty of care.
- Initiate actions to improve health and safety performance throughout Garda Síking Group.
- Ensure that all Operational Directors and Managers are aware of the Health and Safety Policy.
- Inform managers and other employees of existing and potential hazards to health and safety at work, and of the legal requirements relevant to their work.
- Distribute Health and Safety Information.

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- Monitor and report on working practices to ensure that they follow the Company's safe work practices and statutory requirements.
  - Liaise with external organisations (i.e., insurance providers, third party certification bodies etc) on matters relating to occupational health and safety.
  - Approve all changes to the Health and Safety Policy, including check and verify changes to the Policy Statement before Director approval.
  - Ensure safety reports and accident reports are monitored and any recommendations implemented.
  - Ensure all levels of staff receive suitable and sufficient training as is necessary to meet the arrangements of the Health and Safety Policy.
  - Appoint persons to assist in compliance with the Health and Safety Policy (Fire warden, First Aiders, etc)
  - Ensure that a suitable office safety induction is delivered to all new employees.
  - Ensure audits and/or assessments of the Company's workplaces are carried out.
  - Ensure all appropriate statutory and regulatory records are maintained.
  - Ensure sub-contractors undertake their own risk assessments and provide a copy of the report.
  - Manage all safety aspects of sub-contractors under their control.

Note: The local Health and Safety coordinator (Employee Safety Representative) shall be expected to follow the spirit of this manual and view its content as best practice, but also considers a practical approach to its implementation that fits with local legislation and custom.

### ***2.8 Sales and BID Managers shall:***

- Understand the Company's Health and Safety Policy and related statutory requirements.
- Ensure that health and safety is considered throughout the sales process, including estimations in sales offers.

### ***2.9 Supply Managers shall:***

- Understand the Company's Health and Safety Policy and related statutory requirements.
- Ensure that employees considerations are included in the purchase of personal protective equipment (PPE).
- Follow the procedure of purchase of chemicals.

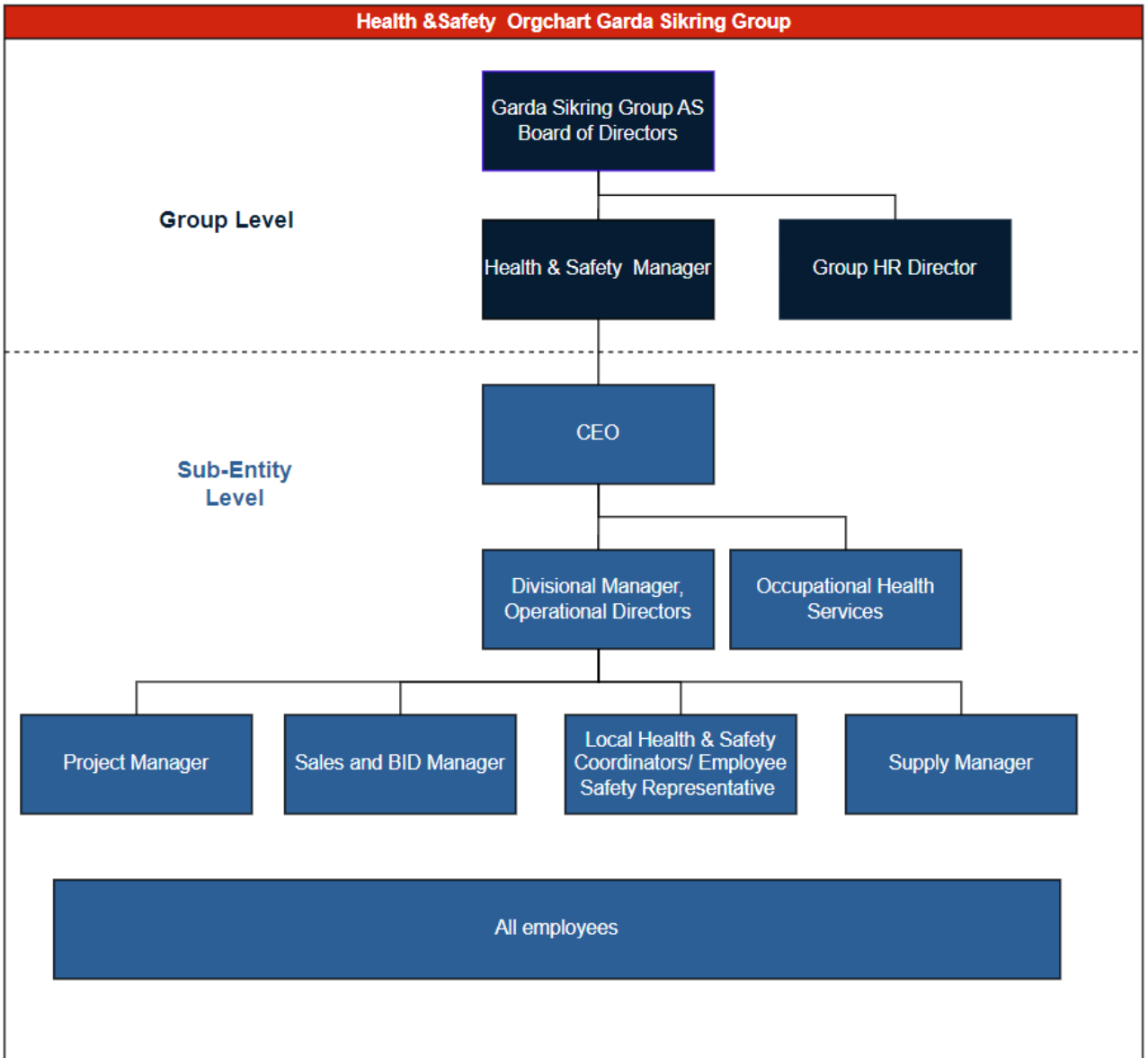


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### ***2.10 All Employees shall ensure that:***

- They understand Garda Síking Group's Health and Safety Policy and related arrangements.
- They take reasonable care for the safety of themselves and others who may be affected by their acts or omissions.
- They always observe safe-working practices.
- Any accidents, incidents, faults, defects, hazards or unsafe conditions are reported immediately.
- They do not interfere with equipment provided in the interest of health and safety.
- They follow all instructions, directions and risk assessments.
- They co-operate with the employer on all matters regarding health and safety.

### 3. Organisation chart



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## **4. Arrangements for health and safety**

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### **4.1 Competent Advice**

Garda Sikring Group shall determine competency as a person or group with sufficient knowledge, training and experience in health and safety matters relating to the Company's undertakings. Garda Sikring Group shall utilise the services of both in-house expertise and external health and safety support, as appropriate.

### **4.2 Information and Records**

Information relating to health and safety matters shall be obtained through a variety of channels including Management System (TQM), official websites, external advisors and professional bodies. Central documents of such information will be obtained in TQM and maintained, being the responsibility of the Health and Safety Manager.

The Health and Safety Manager shall determine the means of dissemination and mode of communication for relevant information (taking into consideration any potential impairments such as eyesight, hearing and language differences).

General update information shall be provided through the Company's internal channels (e.g., Viva Engage, intranet, etc.). It shall be company policy not to rely solely on poster campaigns or signage as a means of communicating information.

Records referenced throughout this policy, shall be retained in line with Company Procedures and in accordance with data protection legislation.

### **4.3 Orientation and Training**

All employees shall receive formal Orientation Training as near to the first day of employment as practical. Line management (persons employing or responsible for supervision of the new starter) will be responsible for ensuring the requirements of this arrangement are completed in regard both health and safety and occupational health attributes.

It is Company policy to ensure, as a minimum, that the Group HR-Director, Health and Safety Manager, CEO, Divisional Manager, Operational Manager, Sales & BID Managers, Supply Managers and Project Managers has competence on ISO 9001, 14001 and 45001. In addition, the same positions shall have competence on the relevant local, national and international statutory regulations in relation to safety and work environment.

### **4.4 Consultation and Communication**

Garda Sikring Group will consult with employees through the Health and Safety Manager. The Health and Safety Manager (or local Health and Safety coordinator (Employee Safety Representative)) shall ensure that health and safety meetings are convened when necessary or when requested. Other meeting may also be utilised for this purpose.

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Consultation and communication with staff shall be maintained to the highest practical extent, utilising the methodologies prescribed within the corporate Management Systems. This shall also include arrangements for employees, contractors and visitors who cannot easily communicate in the principal language at the place of work.

Communication chains shall generally follow the Company hierarchy (see organisation chart). Garda Sikring Group shall ensure that where visually or hearing-impaired persons are employed that effective means of communication are provided. Those employing such persons will be responsible for ensuring the requirements of this arrangement are followed.

All employees are required to contribute to the consultation process and communicate effectively through the available communication chains. In case of any violations, it is Company policy to report through the [whistleblowing portal](#).

#### ***4.5 Supervision and Inspection***

It is Company policy to determine adequate supervision levels through activity specific risk assessment, taking into consideration such factors as difficulty of tasks, risks involved, operative experience, client requirements, etc. Where contractors are engaged they will be required to provide their own supervision regardless of the Company's provision.

The Health and Safety Manager shall ensure that the Company's offices and regular places of work are periodically inspected. Reports of inspections are to be evaluated by the Health and Safety Manager and Office Manager relevant to the location with any remedial actions being determined. The Health and Safety Manager will monitor the remedial action requirements of each inspection to assist with identification of trends.

#### ***4.6 Monitoring, Measurement and Review***

The requirements and performance of this policy shall be monitored through a range of mediums, including inspections, audits and safety inspection, where key activities and operations are evaluated. The Health and Safety Manager (or local Health and Safety coordinator (Employee Safety Representative)) shall be responsible for ensuring this arrangement is followed.

Garda Sikring Group shall endeavour not to rely on accident, ill health and incident statistics as a measurement of performance, though these shall be evaluated. Line management are responsible for ensuring the relevant information is collected and passed to the Health and Safety Manager, who shall ensure statistics are analysed.

The Health and Safety Manager shall measure performance in relation to set aims and objectives on an annual basis.

It shall be Company policy to undertake internal audits to ensure on-going compliance with the Management System and these audits will also be used to monitor Health and Safety operational controls.

The Health and Safety Manager shall review policy and performance on an annual basis, having access to the findings of the above processes.

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#### **4.7 Deviations, Incidents and Non-Conformities**

In the event of a deviations, incidents or non-conformities regarding health and safety matters, it should be reported through the Management System (TQM), if applicable, or the local operational health and safety system. If such system is not in place, it should be reported to a Director for addressing, and if not successfully resolved, directed to the Health and Safety Manager in writing. Procedure to be followed (TQM): '1215 Handling of deviations and incidents'.

#### **4.8 Discipline**

Failure to comply with the Company's Health and Safety Policy or contravention of statutory requirements, regulations or rules, will be disciplined in accordance with conditions of employment.

#### **4.9 Contractor and Agency Selection Control**

Garda Sikring Group shall maintain a database of preferred contractors, of whose health and safety performance is already ascertained and is broadly compatible with Garda Sikring Group's own standards.

Contractors may be subject to competency checks prior to appointment, as deemed necessary by the Health and Safety Manager.

Contractor performance shall be monitored via internal supervision and where necessary ad-hoc health and safety checks undertaken.

#### **4.10 Risk Assessment, Safe System of Work and Control Hierarchy**

ISO 31000 is adopted as the standard protocol for Health & Safety risk assessments conducted by the Group.

It shall be Company policy to assess all aspects of its operations to determine significant risks. All significant risks shall be recorded and communicated to those who may be exposed to them.

Risk assessments shall be reviewed regularly to ensure that they remain suitable and sufficient with any changes being communicated to those affected.

The Health and Safety Manager shall ensure that activity specific risk assessments are maintained and controlled.

Businesses contracted by Garda Sikring Group shall be expected to provide their own assessments, where appropriate.

The risk assessment process shall be used to identify adequate measures to control that risk and to develop a safe system of work that shall follow the expected hierarchy of:

- Avoiding risks
- Combating risks at source
- Adapting the work to the individual
- Adapting to technical progress

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- Substitution of the dangerous for the less dangerous
  - Giving collective protective measures priority over individual protection measures
  - Giving appropriate instruction, information and training to employees

With particular reference to young persons and pregnant women, it is the Company's policy to take specific account of the vulnerability of these groups and to make assessment of the potential impact upon them to determine adequate controls.

All Directors are responsible for ensuring risk assessments are undertaken as applicable for matters under their direct control. They shall also be responsible for ensuring that safe systems of work are implemented.

#### ***4.11 Control of Substances Hazardous to Health***

No substances that fall into this category shall be used unless an assessment has been made and control measures identified, taking into account the substance format, issues affecting the substance, the environment, purpose of use, routes of exposure, people involved, waste control, hazards arising and emergency actions. All aspects of handling, use, storage and transport shall be considered.

Information about such substances shall be obtained from the manufacturer or supplier Material Handling Safety Data Sheets (MHSDS), not Product Information Sheets, to enable assessment to be undertaken. Those ordering materials shall be responsible for obtaining the MHSDS and for passing it to the relevant person(s) as appropriate.

The findings of the assessment, control measures and necessary precautions (and any emergency procedures) will be made clear to all affected prior to use.

The Company's policy and hierarchy of controls shall be followed:

- Avoid use of hazardous substances wherever possible.
- Where the use of a hazardous substance is not avoidable, selection process is to be carried out to remove the most hazardous substances and reduce the effects of their use.
- Protection through design of work processes, isolation of contact and engineering controls and use of work equipment.
- Control of exposure at source, including adequate ventilation systems.
- Use of suitable PPE
- Use of additional training to allow for the full control of the application or use via discipline and experience.
- If any use and storage of chemicals, SDS (Safety Data Sheet) must be available in latest updated version.
- Chemical handling procedure 831 in TQM to be used
- All chemicals to be purchased must go through a risk assessment and substitution process before purchase.

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#### ***4.12 First aid***

The Safety Officer (or Local Representative) shall ensure that a qualified person and a fully maintained first aid box of suitable size and quality is available within the office at all times. The designated person shall be responsible for the maintenance of the first aid equipment including all reserve stocks. Notices will be displayed to identify the first aid contact and equipment location. The Health and Safety Manager (or local Health and Safety coordinator (Employee Safety Representative)) shall ensure that all employees in Garda Síking Group receives a yearly first aid training with minimum practical CPR.

#### ***4.13 Welfare***

The Health and Safety Manager shall in collaboration with the local Health and Safety coordinator (Employee Safety Representative) ensure that suitable and sufficient welfare facilities are provided. Arrangement shall be made for the facilities to be regularly cleaned and maintained.

#### ***4.14 Fire Safety***

The Health and Safety Manager shall in collaboration with the local Health and Safety coordinator (Employee Safety Representative) ensure that a Fire Risk Assessment has been undertaken in respect of all the premises where staff will be working.

The validity of each Fire Risk Assessment shall be reviewed annually or in light of any changes in legislation, employee numbers, or requirements that may affect the suitability of the assessment.

It is Company policy that smoking is strictly prohibited in all places of work, including vehicles.

#### ***4.15 Emergency Procedures***

Where it has been determined that additional hazards exist (other than the fire), such as bomb threat, flooding etc., Emergency Procedures and Response Plans shall be available. The Plans will be an integral part of the Business Continuity Arrangements.

Emergency Procedures shall be appropriate to the Office and its location and may be initiated utilizing the methodology prescribed within the Operating Procedures available from Facilities.

#### ***4.16 Incident Reporting and Investigation***

It shall be Company policy to insist that all incidents requiring first aid treatment and lost-time are regarded as a near-miss incident. All employees are responsible for reporting incidents to their line manager, and line managers for reporting on to the Health and Safety Manager (AND local Health and Safety coordinator (Employee Safety Representative)).

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All reportable incidents (as defined by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) must be communicated to the Health and Safety Manager, who shall ensure that a report is submitted to the relevant authorities, and where necessary also inform the Client.

Where reportable incidents occur to employees working away from one of the Company's offices, they shall be required to report to the Health and Safety Manager, who shall where necessary, forward a copy of the report to the Client.

Incident statistics shall be collected, collated and passed to the Health and Safety Manager (or local Health and Safety coordinator (Employee Safety Representative)) to be evaluated.

Accident Books shall be kept by the Health and Safety Manager (or local Health and Safety coordinator (Employee Safety Representative)). Where an entry is made in the accident book, those making the entry shall return the data immediately to the Health and Safety Manager.

It shall be Company policy to investigate all serious reportable incidents. All serious reportable incidents shall be investigated internally through the Health Safety Manager. External consultants may be requested to assist in investigation of any major reportable incidents. The Directors shall be responsible for ensuring this arrangement is adhered to.

#### ***4.17 Personal Protective Equipment***

It shall be Company policy not to rely on the use of Personal Protective Equipment, but to make assessment of the task and determine more effective controls.

Where it is deemed that PPE is necessary, it shall be considered for ergonomic design (such as size, shape, practicality and with understanding to its limitations or restrictions (loss of ability to easily communicate, loss of mobility, heat gain, replacement availability, etc.)) and shall be assessed for the relevant BS or EN standard applicable to the task.

The Company shall ensure that, where appropriate, staff are trained in the use, storage, handling and maintenance of PPE.

#### ***4.18 Manual Handling Operations***

It is Garda Síochána Group policy to avoid manual handling where practicably possible through use of mechanical lifting aids or alternative assistance. Where manual handling shall be experienced the operation must be controlled to limit exposure. Where deemed necessary by the Health and Safety Manager, a risk assessment shall be undertaken with consideration given to the task, the individual, the environment and the load.

Staff will be provided with relevant training and instruction.

#### ***4.19 Stress Management***

It shall be Company policy to determine working methods that avoid excessive exposure to stress. Managers and Directors shall be assisted to recognise signs of stress and monitor related staff absence and behaviour. For further information on this topic, see the Group Personnel Handbook and ESG Policy.



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Individuals are encouraged to report symptoms of stress to their line manager. All reports are treated with strict confidentiality. Any employees identified with work related stress will be fully supported by Garda Síking Group, who will consider measures to help resolve issues, and where necessary seeking advice from occupational health professionals. The Directors shall be responsible for ensuring that the stress management procedures are enforced within their operational spheres.

#### **4.20 Health Surveillance**

It is Company policy to assess risk from all hazardous work activities. A throughout exposure analysis must be completed in all departments, as a baseline for monitoring health. This exposure analysis must be conducted by Occupational Health Services. The following activities is required to be health monitored:

- Inhalation exposure from hot work operations (welding, cutting etc)
- Inhalation exposure from drilling operation into solid rock, concrete etc.
- Exposure from 2-Iso-Cyanids, aerosols and other chemicals.
- Manual heavy lifting operations.
- Magnetic field operation
- Lead handling operations
- Asbestos

#### **4.21 Work at Height**

It shall be Company policy to plan work at height activities, ensuring those involved are trained and competent. Emphasis shall be given to avoidance of working at height wherever practicable. It is however recognised that this is not always possible and therefore a hierarchy of control measures shall be followed. In practice, and wherever possible, any working at height shall be undertaken by competent contractors.

Wherever practicable it shall be company policy not to allow lone working where any work at height activities are necessary and to ensure the provision of adequate supervision.

All Directors will be responsible for ensuring that the above policy is followed.

#### **4.22 Work Equipment**

Only those with relevant training / competency shall be permitted to operate work equipment, though this policy shall not prevent equipment use for training purposes when under the supervision of a competent person. All Directors shall ensure this policy is adhered to.

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Equipment use shall be suitable for the task and regularly inspected (including before use) as outlined in any risk assessment and inspection by the user. All equipment noted to be defective will be removed from use until repaired, replaced or destroyed as applicable. The person responsible for identification of the defective equipment shall be responsible for ensuring policy is followed

Where the provision of work equipment is supplied by the client and is found to be defective, the Company operates a 'do not proceed' policy.

It is Company policy to ensure all equipment is maintained, inspected and tested as applicable. The Divisional Manager/Operational Directors shall be responsible.

All equipment users/operators shall use equipment according to instructions provided and training received, and as designed for purpose without adaption.

#### ***4.23 Lone Working***

It is Company policy to minimize lone working. If any lone working takes place, ensure a risk assessment is undertaken.

Garda Sikring Group shall ensure that employees, who have no option but to undertake lone working, are provided with instruction in the requirements of the risk assessment.

Divisional Manager/Operational Directors will be responsible for ensuring that Security Policies, where available, are fully implemented.

#### ***4.24 Housekeeping***

Garda Sikring Group shall enforce a policy of high standards of housekeeping in all its offices and at all places of work. This shall be the responsibility of all Directors.

Staff working at Clients premises are required to strictly adhere to their policies and standards.

## 5. Relevant additional documents

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Personnel handbook

Whistleblowing policy

Employee Code of Conduct

ESG Policy