Health & Safety Policy

Manual Rev 12

February 2026

STRUCTURETONE

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Amendment Record

DATE	ITEM	BY	NOTES
June 2020	Updated due to the updated Integrated Management Plan including ISO 45001:2018 Standards	Fiona O'Reilly & Janet Fitzpatrick	Addition of Resources, Employee Risk Assessment & COVID-19 Risk Assessment
January 2021	Updated to include additional information.	Janet Fitzpatrick	Addition of Serious Incident Communication Protocols, amended STL Org chart, addition of Safety Representative, exclude risk assessments from document &
January 2022	Updated to include additional information	Janet Fitzpatrick	Amendment of STL Org Chart & Safety 360 logo
June 2022	Updated to include additional information	Janet Fitzpatrick	Amendment of STL Org Chart & COVID19 Compliance Officer. Additional Risk Assessments added to log. First Aid Requirements amended.
January 2023	Updated to include additional information	Janet Fitzpatrick	Amendment of STL Org Chart & Addition of Communication Flowchart
November 2023	Updated to include additional information	Janet Fitzpatrick	Update to include STOBG Code of Conduct- Section 2.1.7
November 2024	Updated to include additional information	Janet Fitzpatrick	Amendment of STL Org Chart, CAP Programme & Boxcore
November 2025	Updated to include additional information	Niall Forristal	Amendment of STL Org Chart, Update to mandatory PPE, Addition of Datascope system, Additional risk assessment
February 2025	Updated to include additional information	Deirdre Gingles	Amendment of STL Org Chart, Change in senior management

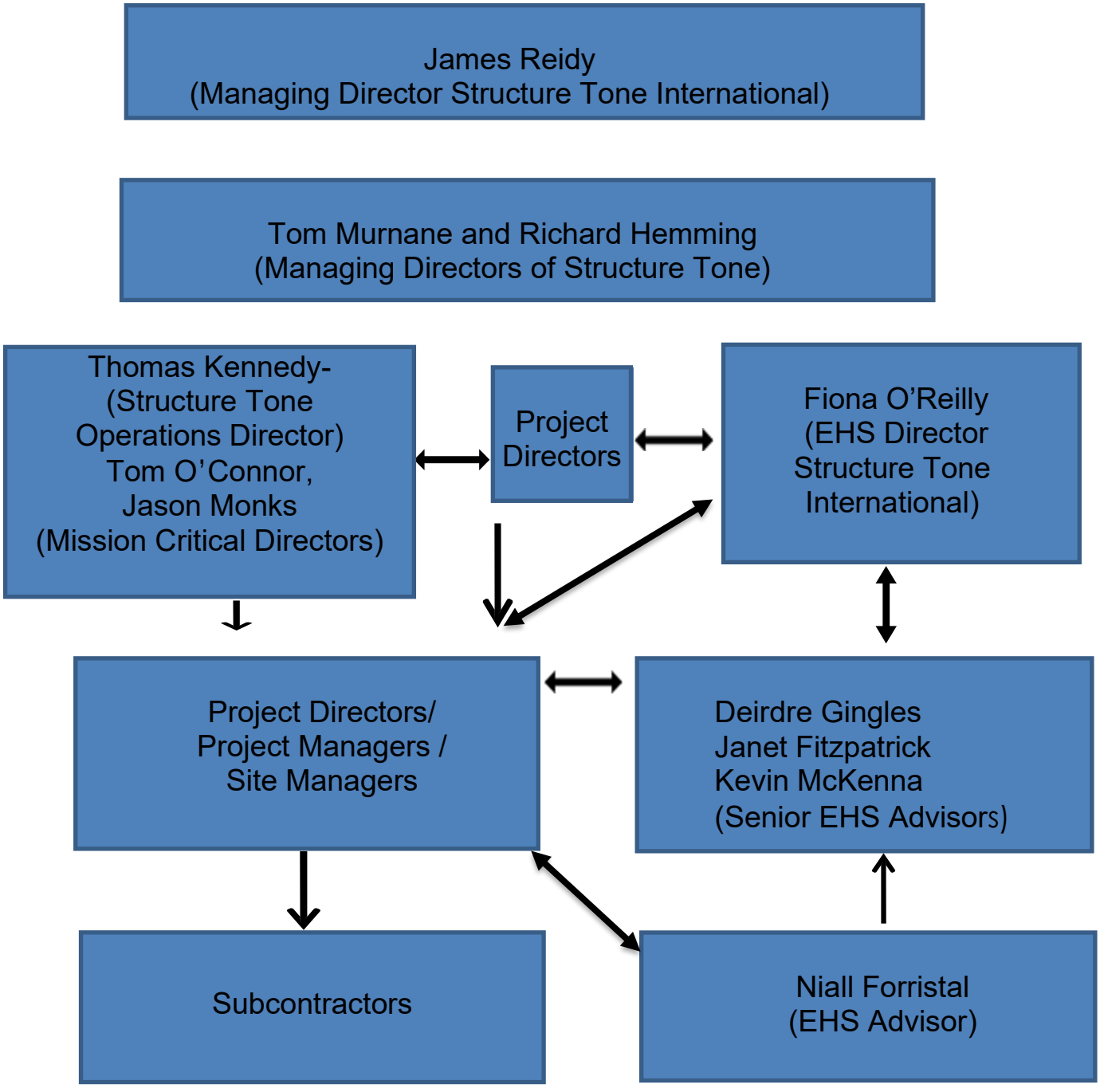
Introduction

Health & Safety Policy Manual
The Health & Safety Policy Manual is used by all staff and defines systems, procedures and best practice.

The main sections of the H&S Policy Manual are:

1. Health & Safety Management Structure Chart
2. Duties & Responsibilities
3. Arrangements for Policy Implementation
4. Structure Tone Project Planning Procedures
5. Structure Tone Procedures for Pre-Construction & Construction
6. Resources
7. Training Policy and Procedures
8. Accident/ Incident Management Procedure
9. Selection and Control of Sub Contractors
10. Communication and Consultation
11. Company Offices (Not including Site Office)
12. Site Office
13. First Aid Arrangements for Sites
14. Food Hygiene- Kitchens & Canteens
15. OH&S Risk Assessments

1 Health and Safety Management -Structure Chart



2. Duties and Responsibilities

The works that Structure Tone carry out are construction contracting to include construction management, design and build, project management and management contracting in the public and private sectors.

- The Safety Health & Welfare at Work (Construction) Regulations 2013 establishes duties for Clients, Project Supervisors, Designers, Project Supervisors for Design Process (PSDP), Project Supervisor for Construction Stage (PSCS), subcontractors and contractors. The Regulations outline that throughout the duration of all construction projects, as far as reasonably practicable that all risks are identified. All risks must be removed, reduced or controlled by adequate procedures being put into place prior to the works commencing. All aspects of works will be covered by a Specific method statement and risk assessment (RAMS) which must be communicated to all personnel prior to works commencing. Where works can be adequately covered, risks assessed and adequate control measures outlined on a five- day Safe Plan of Action (SPA), the SPA will be completed by a competent person and communicated to all personnel prior to works commencing.

- Structure Tone will ensure that as Principal Contractor/Main Contractor/PSCS that the general duties outlined in the Safety Health and Welfare at Work (Construction) Regulations 2013 are implemented, monitored and reviewed on a regular basis. Regular reviews of the Structure Tone EHS Management system will be completed by carrying out internal and external Safety, Health, Environmental & Quality Audits. The findings of these internal and external Audits will be discussed at the Monthly Department Meetings and Operations Council meetings and with the relevant Site Management Teams and weekly EHS meetings held with the subcontractors.

- Structure Tone Health & Safety procedures cover planning, employment of competent personnel to work in a coordinated team approach.

- Training for all STL personnel will be reviewed on a regular basis and will be discussed at the Monthly Department Meetings and Resource meetings. Where necessary adequate training will be put into place. Training will out-sourced where required. Internal training will be completed on a regular basis with all Structure Tone personnel.

- Set a personal example by wearing appropriate protective clothing/personal protective equipment when onsite, safety gloves, safety eye protection, safety helmet with chin strap, safety footwear and high visibility vests).

- Work in a safe manner at all times.

- In respect of Health, Safety and Welfare assist the company in achieving "Company Standards". Individuals who are considered to consistently ignore this aim will be subject to disciplinary action.

2.1 Client

- The Client will appoint in writing before design work starts, a project supervisor for the design process (PSDP) who has adequate knowledge, experience and resources to complete the role as PSDP.
- Appoint in writing before construction begins, a project supervisor for construction stage (PSCS) who has adequate training, knowledge, experience and resources.
- The Client must be satisfied that each designer and contractor appointed by the Client has adequate training, knowledge, experience and resources for the work to be performed.
- Co-operate with the project supervisor for the design process and the project supervisor for the construction stage and supply all relevant and necessary information.
- Retain and make available the Safety File for the completed structure.
- Projects for furtherance of a business, trade or undertaking, provide a copy of the safety and health plan prepared by the PSDP to every person tendering for the project.
- Notify the Health & Safety Authority in writing in an approved form of the PSDP (Project Supervisor for Design Process) where construction is likely to take more than 500 person days or 30 working days.

2.2 Designer

- The role of a Designer under the Construction Regulations 2013 is defined as:- Designers who are engaged in preparing drawings, particulars, specifications, calculations, and bills of quantities on the project. The designer also has responsibility in designing temporary works and submitting design information including drawings, calculations and temporary work certificates. The designer is obliged (so far as is reasonably practicable) to ensure that the design includes adequate information about aspects of the design or of the materials specified which may affect the Health and Safety of those working on the project.
- In determining what is "so far as is reasonably practicable" the risk to Health and Safety produced by a feature of the design has to be weighed against the cost of excluding that feature by: -

    - Designing to avoid risks to Health and Safety
    - Tackling the causes of risk at source; or if this is not possible reducing and controlling risks by protecting anyone at work who might be affected so yielding the greatest benefit.

As a Designer the responsibilities and duties are-

- Identify any hazards that the design which may present a hazard during construction and subsequent maintenance.
- Where possible eliminate the hazards or reduce the risk.
- Communicate the necessary control measures, design assumptions and or remaining risks to the PSDP. The PSDP can then add and outline the control measures to be taken in the Preliminary Health & Safety Plan.
- Cooperate with other designers, PSDP and PSCS and must take account of any existing Health and Safety plan or file.
- Comply with directions as issued by the PSDP where a PSDP has been appointed.
- Inform the Client of the requirements of the Legislation regarding the appointment of a PSDP.
- The Safety Health and Welfare at Work Act 2005 requires designers to ensure that the project is capable of being constructed to be safe, can be maintained safely and complies with all relevant health and safety legislation.

2.3 Project Supervisor for Design Process

- A competent PSDP must be appointed in writing by the Client for each project.
- Identify hazards arising from the design or from the technical, organisational, planning for time related aspects of the project
- Where possible, eliminate the hazards or reduce the risk
- Communicate necessary control measure, design assumptions or remaining risks to the PSCS so they can be dealt with in the Safety and Health Plan
- Ensure that the work of designers is coordinated to ensure safety
- Organise co-operation between designers
- Prepare a written safety and health plan for any project where construction will take more than 500 person days or 30 working days or there is a Particular Risk and deliver it to the client prior to tender.
- Prepare a safety file for the completed structure and give it to the client
- Notify the Authority and client of non-compliance with any written directions issued The PSDP may issue directions to designers or contractors or others.
- Temporary works will be coordinated and communicated between all parties including the PSCS and Design Team.

2.4 Project Supervisor for Construction Stage

- A competent PSCS will be appointed in writing by the Client for each project.
- Co-ordinate the identification of hazards, the elimination of the hazards or the reduction of risks during construction.
- Develop the Safety and Health Plan initially prepared by the PSDP before construction commences.
- Co-ordinate the implementation of the construction regulations by

contractors.

- Organise cooperation between contractors and the provision of information.
- Co-ordinate the reporting of accidents to the Authority.
- Notify the Authority before construction commences where construction is likely to take more than 500 person days or 30 working days.
- Provide information to the site safety representative.
- Co-ordinate the checking of safe working procedures.
- Coordinate measures to restrict entry on to the site.
- Co-ordinate the provision and maintenance of welfare facilities.
- Co-ordinate arrangements to ensure that craft, general construction workers and security workers have a Safety Awareness card, e.g. Safe Pass and a Construction Skills cardwhere required.
- Co-ordinate the appointment of a site safety representative where there are more than 20 persons on site.
- Appoint a safety adviser where there are more than 100 on site.
- Provide all necessary safety file information to the PSDP.
- Monitor the compliance of contractors and others and take corrective action where necessary.
- Notify the Authority and the client of non-compliance with any written directions issued.
- The PSCS may issue directions to designers or contractors.

2.5 Contractors

- Co-operate with the PSCS Provide a copy of your safety statement and relevant information to the PSCS.
- Promptly provide the PSCS with information required for the safety file.
- Comply with directions of Project Supervisors.
- Report accidents to the Authority and to the PSCS where an employee cannot perform their normal work for more than 3 days.
- Comply with site rules and the safety and health plan and ensure that your employees comply.
- Identify hazards, eliminate the hazards or reduce risks during construction.
- Facilitate the Site Safety Representative.
- Ensure that relevant workers have a safety awareness card and a construction skills card where required.
- Provide workers with site specific induction.
- Appoint a safety officer where there are more than 20 on site or 30 employed.
- Consult workers and Safety Representatives.
- Monitor compliance and take corrective action.
- Where no PSCS has been appointed, inform the client that a PSCS must be appointed.

2.5.1 Site Safety Representatives

The person appointed / elected in accordance with Regulation 23 of the Safety, Health and Welfare at Work (Construction) Regulations 2013

- Who may obtain safety information from the Project Supervisor for the Construction Stage (PSCS),
- make representations to the PSCS or contractor(s) on site,
- investigate accidents & dangerous occurrences,
- make representations to HSA Inspectors,
- carry out safety inspections,
- investigate potential hazards and complaints,
- accompany HSA inspectors whilst they are on site,
- invited to the weekly EHS Meeting,
- form of training will be provided to the Safety Reps in the form of a Toolbox talk.

2.6 Directors

- It will be the responsibility of all Directors to ensure the well- being of all persons employed by Structure Tone.
- Provide the organisation, finances and resources necessary for the implementation of the Structure Tone Policy for Health, Safety and Welfare.
- Be aware of the statutory requirements affecting Company operations and seek further advice when necessary.
- Ensure that staff at all levels receives appropriate training.
- Monitor the safety performance of sites through the SHEQ team and take appropriate action whenever a site's safety performance is not up to Company Standards.
- Actively promote at all levels the Company's commitment to effective safety management.
- Ensure that all new staff is issued with a copy of the Company Policy for Health, Safety and Welfare.
- Set a personal example by wearing appropriate protective clothing/personal protective equipment when on site.
- The Board of Directors will ensure that decisions made reflect the Company's Health and Safety intentions as identified in the Policy Statement.
- The Board of Directors have nominated one Director as having particular responsibility for Health and Safety within the Company (refer to signed Policy).
- The duties of the Director Responsible for Health and Safety will include:
- Understanding the statutory requirements affecting the company's operations and keeping the board informed.
- Ensuring that, where the Company commissions any "construction work" as a

"client" or acts as an agent for another organisation for such work the requirements of the Construction Regulations 2013 are complied with, in particular the appointment of a Project Supervisor for the Design Stage and Project Supervisor for Construction Stage and main Contractor.

- Ensure that there is a system in place to provide staff with the required training appropriate to their job functions and the training needs of individuals are regularly reviewed against job requirements. Ensure that records are maintained.
- Ensure all projects have sufficient first aid Response cover as set under the Pre- Hospital Emergency Care Council.
- Reprimand any member of staff failing to discharge their duties in accordancewith Company standards.
- Lead by personal example.
- Arrange for regular meetings with senior management to discuss; Company health and safety standards, accident investigations, safety performance and areas forimprovement.
  Annually review the Company's Health & Safety performance with the board of Directors, Project Directors, Project Managers and Construction Managers
- Identify the role and responsibility of Structure Tone. In respect of the Construction Regulations, for each project.
- Ensure that the Project Team prepares a Construction Stage Health and Safety Plan at the start of the contract, and that they operate in accordance with it. The PSDP Health and Safety Plan hazard identification and control measures must be taken into consideration when completing the Construction Stage Health and Safety Plan.
- Undertake a Manual Handling Assessment of relevant site activities when developing the Health & Safety Plan.
- Ensure that the regular progress meetings include safety as an agenda item and Weekly Site Managers Safety Checks take place on site every week, in accordance with Company Policy.
- Monitor the overall safety performance of sites and ensure that action is takenwhenever sites fail to meet Company Safety Standards.
- Ensure the SHEQ team are involved at pre-contract stage on all new contracts.
- Ensure the SHEQ team are informed about remedial and contract maintenanceworks.
- When placing sub-contract orders, ensure that the Selection and Control of Sub- Contractors Procedure is followed.
- Discuss safety matters with site management teams at regular site management meetings.
- Plan safety into work activities and ensure the site teams have adequate time, resources, information, skills and training to carry out the operations to Company Standards.
- Ensure that the overall safety performance of sites is discussed atregular intervals with all supervision, including sub-contractors.
- Report any problems or improvements to this policy to the appropriate

Director orSHEQ team.
- Actively promote at all levels the Company's commitment to effective safety management.
- Set a personal example by wearing appropriate protective clothing/personal protective equipment when on site.

2.7 Site Manager

- Ensure that all site supervisors are aware of their responsibilities.
- Understand the roles and responsibilities of Structure Tone in respect of the Construction Regulations for that particular site.
- Help Prepare a Health & Safety Plan at the start of the contract and ensure that the project team operates in accordance with it.
- Ensure ALL new employees, including sub-contract employees, are instructed on Structure Tone safety requirements, including project specific requirements.
- When placing sub-contract orders, ensure that the Selection and Control of Sub- Contractors Procedure is followed. Review all RAMS and ensure the RAMS fully cover the full aspects of works to be undertaken including hazard identification and the control of risks associated with same. Carry out regular reviews of RAMS and ensure the information is fully communicated with all personnel undertaking the works. Where necessary request updated RAMS.
- Organise and plan sites so that work is carried out to Company Standards with minimum risk to employees, other contractors, and members of the public, equipment, materials and the environment. Bring to the attention of the Project and/or Construction, Director
- /Manager and the SHEQ team any improvement required, or problems being encountered.
- Plan safety into site operations; in particular by effective use of the progress meetings, where safety is an agenda item, supervisor's meetings and safety briefings.
- Ensure that adequate supplies of personal protective equipment are available on site.
- Make full use of the services of Structure Tone's SHEQ team and ensure that all recommendations are actioned. Report immediately any dangerous occurrences, reportable accidents, disciplinary action or HSA visits to the SHEQ team.
- Ensure that all sub-contractors are made aware of their responsibilities for safety on your contract.
- Actively promote at all levels the Company's commitment to effective safety management.
- Ensure that COSHH, Manual Handling, Noise and Risk Assessments are effectively monitored, reviewed and available on site.
- Identify the requirements for method statements, and ensure they are produced and approved on time. Identify required distribution (e.g.

Foremen, Supervisors, Operatives, Client, and Professionals) and ensure it is strictly followed and controlled.

- Appoint a responsible person to induct all staff in respect of safety within the site offices.
- Lead by example and promote good health and safety standards at all times whilst on site. Always wear the correct PPE.

2.8 Site Supervisors/ Logistics Managers

- In conjunction with the Site Manager, ensure all new employees, including sub- contractors, are instructed on Structure Tone Safety Instructions and written records kept.
- When method statements are produced ensure that all affected persons are briefed as to the contents and monitor operatives for compliance, including sub-contractor operatives.
- Ensure that an adequate supply of personal protective equipment is kept on your site and implement disciplinary procedures against any employee who does not make full use of this equipment.
- In conjunction with the Site Manager plan safety into work activities.
- In conjunction with the Site Manager discuss safety with all supervision, including Sub- Contractors, on a regular basis, and record any findings.
- Ensure all statutory and company specific inspections are carried out as prescribed in the Construction Health & Safety Plan.
- Make full use of the services of Structure Tone's SHEQ team and co-operate with them to achieve Company Standards on site and advise the SHEQ team of all disciplinary measures taken on site.
- Do not allow horseplay, and discipline those who consistently fail to consider their own or others safety.
- Follow Company Procedures and report any problems in achieving these standards to the Site Manager and SHEQ team.
- Actively promote at all levels the Company's commitment to effective safety management.
- Ensure that the requirements of COSHH, Manual Handling, Noise and Risk Assessments are brought to the attention of all operatives involved.
- Ensure that when permits to work are issued all operatives involved in the work operations understand them.
- Actively encourage employees to report Health, Safety and Welfare problems.

2.9 Operatives (Including Subcontract Labour)

- Read and understand the company health and safety policy and carry out your work in accordance with its requirements and those of any Health and Safety Plan developed for the site on which you are working.
- Ensure that you have received induction instructions for the site you are working on from Structure Tone supervision.
- Ensure that you follow the instructions given to you at the Induction, and all subsequent safety briefings (e.g. method statements, risk assessments, manual handling, toolbox talks, etc.) and that you act in a responsible manner.
- Actively participate in the management of Safety by reporting all incidents,

accidents and near misses.
- Do not lift anything that you are not physically capable of lifting comfortably. Understand the techniques required to lift safely.
- If in doubt of any risk associated with your work ask you supervisor.
- Always wear the PPE identified, or displayed on signage, and ensure it is worn correctly.
- Do not use plant or equipment for work for which it was not intended or if you are not trained or experienced to use it. Use the correct tools and equipment for the job. Keep tools in good condition. Report immediately to supervision any defects in plant or equipment.
- Work in a safe manner at all times. Do not take unnecessary risks which could endanger yourself or others. If possible, remove site hazards yourself, e.g. remove or flatten nails sticking out of timber, tie unsecured access ladders, etc.
- Report to supervision any person seen abusing the welfare facilities provided.

2.10 Commercial and Site Support Staff

- Ensure persons under your control work in a safe manner.
- Assist the Site Management in achieving Company Safety Standards on site, by reporting unsafe operations and conditions.
- Suggest ways of improving overall safety performance.
- When placing sub-contract orders, ensure that the Selection and Control of Sub- Contractors Procedure is followed.
- Ensure the provision of Support Services in no way compromises Site Safety.
- Set a personal example by wearing appropriate protective clothing/personal protective equipment when on site.

2.11 Visitors to Site

- Visitors to site, including Structure Tone personnel, must ensure that they receive a visitor's induction on their first visit to a site. All visitors will be accompanied on site.
- Visitors shall ensure that they follow the instructions given in the induction, and act in a responsible manner.
- If visitors to the site need to actual go onto the designated works area they are expected to wear the appropriate PPE at all times.

2.12 SHEQ Team

- Identify the role and responsibility of Structure Tone in respect of the Construction Regulations for each project and agree a course of action with the Project Director/ /Construction Manager and Site Manager to satisfy these requirements.

- Assist site management in preparing the Construction Health & Safety Plan, prior to the contract commencing.
- Identify areas/operations which require specific safety/environmental instructions and organise and assist with this instruction on site using visual aids etc., as required.
- Provide information in the form of Instruction's, Best Practice Guidance notes, Codes of Practice, Safety Information Sheets etc., and inform the site management of group accidents/incidents/visits from the Health and Safety Authority and Environment Protection Agency.
- Ensure induction instructions are reviewed on site regularly and are relevant to the work in hand and are effectively carried out on site.
- Review high-risk contractors' method statements, provide any assistance required in assessing method statements, and monitor the implementation of the same on site.
- Ensure by Instructions/advice, information and training those contracts are being carried out to Company Standards.
- Advise the Site Manager if his contract is not achieving Company Safety Standards and further advise the Project/Construction Manager and Director Responsible for Safety.
- Communicate effectively with the Health and Safety Executive regarding the Policy and inspections, accidents and incidents, ensuring that accidents and dangerous occurrences are reported promptly.
- Investigate accidents/incidents as required by HSA. Make known and discuss all findings/recommendations throughout the Company.
- Liaise with Project/Construction Managers on contract standards and any future changes or additions to the Policy and any specific areas of the policy where particular emphasis is required.
- Monitor the effectiveness of the Structure Tone's approach by site inspections and audits and report on improvements necessary. Ensure continuous improvement by continual research.
- Ensure all of the site team is involved in the safety and environmental management of the contract by discussion, briefings, training sessions and effective communication.
- Monitor the effective running of the progress meetings, where safety is an agenda item, and monitor that items requiring attention are actioned.

- Ensure that all risk assessments required by current statute are carried out, information is displayed on the site safety notice board, and that effective arrangements for briefing employees on the above are implemented.
- Update as necessary EHS policies and SHEQ Management system to ensure all relevant Legislation, Code of Practices and Acts are fully implemented.

2.13 Office Based Staff

- Read and understand the company's safety policy and carry out your work in accordance
  with its requirements.
- Office based staff are expected to follow all instructions given at Induction and act in a responsible manner. In general employees must:
- Take reasonable care for the health and safety of themselves and others whilst at work.
- Co-operate with management to enable compliance.
- Do not intentionally or recklessly interfere with or misuse anything provided for the purposes of health and safety.
- Set a personal example by wearing appropriate protective clothing/personal protective equipment when on site.
- Report any safety issues to their line manager or the SHEQ team.
- Where additional hazards are introduced in your working area or an adjacent area, such as construction work, make sure you comply with the health and safety requirements brought to your attention by your supervisor.
- Do not try to use, repair or maintain any office equipment or machinery, or carry out any work activity which may be hazardous to your health and safety, for which you have not received full instructions or training.
- Report any defects in office equipment or machinery immediately to your supervisor.
- Ensure that you know the location of the first aid box and who the first aider is.
- Ensure that you know the procedure in the event of a fire, or other emergency and comply with its requirement. Do not use fire-fighting equipment unless you have been trained in its specific use.
- Report any accident or damage, however minor, to your supervisor.
- It is your responsibility to maintain your work area keeping it tidy.
- Ensure that corridors, office floors, doorways, etc. are kept clear and free from obstruction, trailing wires, drawing pins, open desk or filing cabinet drawers or doors.
- Do not attempt to lift or move, on your own, articles or materials so heavy as likely to cause injury.
- Do not attempt to reach items on high shelves unless using steps or a properly designated hop-up, do not improvise or climb.
- Suggest ways of eliminating hazards and improving working methods.
- Do not smoke in designated "No Smoking" areas and dispose of spent matches, cigarette ends, etc. properly.
- Ensure that when using chemical substances such as cleaners or detergents you make sure you comply with the requirements of any assessment made for its safe use.
- If in doubt check with your supervisor
- When Office personnel visit site they must ensure that they receive a visitor

induction. All visitors will be accompanied on site.

2.14 Office Staff

- Read and understand the company's safety policy and carry out your work in accordance with its requirements.
- Office based staff are expected to follow all instructions given at Induction and act in a responsible manner. In general employees must:
- Take reasonable care for the health and safety of themselves and others whilst at work.
- Co-operate with management to enable compliance.
- Do not intentionally or recklessly interfere with or misuse anything provided for the purposes of health and safety.
- Do not try to use, repair or maintain any office equipment or machinery, or carry out any work activity which may be hazardous to your health and safety, for which you have not received full instructions or training.
- Complete a display screen equipment self -assessment check sheet and report any issues to the STL Office Manager.
- Report any defects in office equipment or machinery immediately to your supervisor.
- Ensure that you know the location of the first aid box and who the first aider is.
- Ensure that you know the procedure in the event of a fire, or other emergency and comply with its requirement. Do not use fire-fighting equipment unless you have been trained in its specific use.
- Report any accident or damage, however minor, to your supervisor.
- It is your responsibility to maintain your work area keeping it tidy.
- Ensure that corridors, office floors, doorways, etc. are kept clear and free from obstruction, trailing wires, drawing pins, open desk or filing cabinet drawers or doors.
- Do not attempt to lift or move, on your own, articles or materials so heavy as likely to cause injury.
- Do not attempt to reach items on high shelves unless using steps or a properly designated hop-up, do not improvise or climb.
- Suggest ways of eliminating hazards and improving working methods.
- Do not smoke in designated "No Smoking" areas and dispose of spent matches, cigarette ends, etc. properly.
- Ensure that when using chemical substances such as cleaners or detergents you make sure you comply with the requirements of any assessment made for its safe use.
- If in doubt check with your supervisor

2.1.6 Safety 360 Committee

The continual roll out of the Safety 360 training will be reviewed on a regular basis by the corporate safety 360 STOBG Committee & the Dublin Safety 360 Committee: James Reidy, Jason Monks, Fiona O'Reilly, Tom Kennedy and Sean Bagnall.
The regular review of statutory legislation will be reviewed on a monthly basis through the Department & Project Directors Meetings.

Structure Tone also forms part of the CIF Safety Committee.

2.1.7 Code of Conduct

STO Building Group's Code of Conduct and Business Ethics (the "Code"), available here, is the keystone to our commitment to ethical conduct. It provides guidance on upholding STO Building Group's core values and helps employees and business partners understand the legal and ethical principles that govern the way we conduct business.

The Code applies to all STO Building Group employees, and to members of the board of directors, agents, consultants, contracted labor, and others when they are acting for or on behalf of STOBG. This Code also applies to the company's vendors, subcontractors, suppliers, and other business partners.

The Code is an indispensable resource, but it cannot address every situation that may arise. We rely on you to exercise common sense and good judgment in applying the principles contained in the Code, and to ask for help when you need it.
These key principles include:

- Maintaining compliance with the letter and spirit of all applicable laws and regulations
- Upholding our commitment to maintaining a respectful workplace, free from discrimination and harassment, and to fair employment practices providing business opportunities to minority, women-owned, and disadvantaged business enterprises (M/W/DBEs)
- Avoiding conflicts of interest—actual, potential, and perceived
- Promoting fair competition and making business decisions exclusively on the basis of
- Price, service, and the ability to meet the company's and clients' needs
- Operating in a fair and transparent fashion and disclosing material terms and conditions of our engagements
- Keeping accurate company documents and records

As a member of the STOBG family, you also have a duty to let the company know about any potential misconduct. Managers have a duty to act and to ensure that reports of potential misconduct made to them are promptly escalated and handled in accordance with the Code. You can report potential misconduct to or seek guidance from any of the following company resources:

- Your manager, a more senior manager, or your business unit leader
- A member of STOBG executive management
- Your compliance liaison or the Compliance & Ethics Department, which can be reached by email at: compliance@stobuildinggroup.com
- The Human Resources Department
- The Legal Department

You may also report potential misconduct anonymously through our 24/7 helpline, operated by a third party unaffiliated with STOBG, by calling the below toll-free numbers or visiting the online portal.

Call toll-free:
800.461.9330 in the United
States 1.800.235.6302 in
Canada 0808.189.1053 in the
United Kingdom 1800.904.177
in Ireland

Online: compliancehelpcenter.com

3. Arrangements for Policy Implementation

3.1 Monitor and Review of the Policy

In order to comply with Health and Safety this handbook must be monitored, evaluated and reviewed as appropriate to ensure it effectively meets the Statutory Requirements related to the Company's activities and reflects best practice in safely achieving work objectives.

Progressive improvement in health and safety performance can only be achieved through constant development of policy approaches to its implementation and techniques of risk control.

The outcomes of the monitoring, evaluation and review processes are to secure:

- The maintenance and development of an effective health and safety policy.
- The maintenance and development of an effective organization to ensure that the policy is implemented.
- The maintenance and development of improving performance standards.
- The implementation of remedial action by responsible person(s) when failures or gaps in policy are identified.

To achieve these outcomes all supervisors and employees must constantly evaluate their work activities in relation to the policy and bring to the notice of the company through its management system and/or safety coordinating arrangements any areas where this policy is inadequate or ineffective.

The company will make arrangements for the SHEQ team to visit the Company's sites and premises at regular intervals to identify and report on any hazards, lack of control measures, defects or breaches of regulations. A report of the inspection will be issued to the project team including the Project Manager, Project Director, Operations Director, and EHS. To establish if the appropriate procedures in Integrated Management System have not been complied with or are deficient and action can be taken to ensure similar problems do not recur on Company sites.

In adopting a pro-active approach to ensure that Structure Tones safety policy is being effectively implemented, managers have the responsibility to undertake routine safety inspections, assisted by the SHEQ team if appropriate, of their management area.

The safety inspection undertaken for each major activity under the manager's control should examine current performance, adherence to requirements and

where deficiencies are identified to take practical action to improve standards and/or modify the safety policy. A formal report on the safety audit will be submitted to the relevant director for a review of its findings and recommendations. (SHE inspections) Such safety inspections should be undertaken on a regular basis, or at specified intervals as appropriate to the risk environment managed by the individual Manager.

A review of overall company performance in health and safety will be undertaken at annual intervals, or other intervals as arranged. The Health & Safety Director and the company's senior management will discuss safety performance over the preceding period reviewing accidents, compliance with policy, requirements for competence training and other issues relevant to improving this policy and performance.

The SHEQ team will submit a quarterly report to the Board of Directors outlining Company Safety performance for that period. The report will compare progress measured against the yearly objectives and, where necessary, make recommendations to the board to improve performance.

3.1.1

In order to comply with Health and Safety; this handbook must be monitored with special regards to STL "recognise that all staff have the right to be treated with respect and dignity when at work and is committed to ensuring that all staff is free to do their work in a safe environment"
The Company will not condone any infringement on personal integrity through any form of Bullying, Harassment or Sexual Harassment as referenced in this policy. Bullying, Harassment or Sexual Harassment in any form will not be tolerated, whether perpetrated by a member(s) of staff, client, supplier or a business contact of the Company.
It should be noted that bullying, harassment and sexual harassment are defined by their impact on the target of the bullying/harassment not by the intention of the perpetrator.

Employees:
Each individual employee is required to contribute to achieving an environment free of bullying and harassment through co-operation with management's commitment to preventing bullying and harassment. Each employee must be aware of their duty not to place the dignity, safety and welfare of their colleagues at risk by engaging in or condoning bullying and harassment.

Please refer back to Section 8: Respect & Dignity at Work procedures, Structure Tone's Employee Handbook (EHB-01).

Structure Tone Project Planning Procedures

4.1 Introduction

Our professional management philosophy is based upon principles, which have proved successful in the past. These are:

- Detailed forward planning
- Good communication
- Motivation of the team by the team
- A strong sense of discipline
- Training
- Measurement and review of performance
- Consultation & Participation of Workers

4.1.1 Effective Planning

Contract safety planning has three distinct phases.

a) Pre-tender: Where known hazards are assessed, and resources allocated accordingly. Information can be obtained from:

- Tender Documents.
- Meetings.
- Site Visits.
- Pre-construction information.

b) Contract Award: Where the key members of the Project Team meet to discuss and agree actions on all the potential health and safety hazards which are likely to be experienced throughout the contract. At this meeting the development of the Construction Stage Health & Safety Plan will be formulated.

c) Throughout the Contract: A progress meeting where safety is an agenda item will be held regularly to review all expected site activities for the forthcoming period and to discuss in detail the relevant method statements, risk assessments and agreed actions. Discussion will also include training requirements, employment of sub-contractors, utilisation of plant and materials, and the overall co-operation and co-ordination of all parties. The site team then agrees the current safety standard being achieved. This meeting will be recorded. If necessary, the H/S Plan will be amended.

This planning framework is intended to ensure that the appropriate safety procedures are followed on site and that safe systems of work are adopted.

4.2 Key Phases to the Planning Process

4.2.1 Tender Stage:

Utilising the pre-construction information provided by the Client/Project supervisor (as appropriate) Structure Tone will assess the areas of significant risk and evaluate the resources required to either remove or reduce such risks and thereby enable management to control the activities with minimum residual risk to employees or those affected by the works. Such information may be presented in the form of an initial contract risk assessment detailing major global issues for the project and taking into account the design and construction processes including impact on the environment and the final maintainability of the structure.

Structure Tone Pre-Construction will liaise with Operations to determine the necessary competency of personnel when establishing the project team to ensure the OH&S performance is not affected directly/ indirectly.

Supporting documentation will be submitted with the tender along with any other additional information requested.

4.2.2 Upon Award:

Prior to any works commencing on site the Project Team, including the SHEQ team where necessary, will initiate a pre-start safety meeting with the construction team to discuss and agree actions on all aspects of safety pertinent to the particular project including known hazards, environmental issues, use and control of plant, materials and labour and above all the allocation of their individual roles and responsibilities to ensure the successful management of the project – see Pro-forma for Pre Start meeting in the Construction Stage Health and Safety Plan.

This initial meeting will formulate the basic information to develop the Health and Safety Plan for the project in conjunction with the pre-construction information provided by the Project Supervisor. The Plan will be monitored, reviewed and updated via the regular site progress meetings.

The regular site progress meetings brings together the management team for the project in order to review, discuss and ensure actions are initiated for the safe completion of the works. Safety will be an agenda item. The frequency of the meetings will be identified in the Construction Stage Health & Safety Plan.

The skills and experience of those present will identify the operations to be undertaken, materials and plant to be utilised, and therefore readily assess the risks.

This enables the formulation of a practical method of working taking into account all elements and highlighting particular training requirements, level of supervision and inspection criteria.

The team will also review current activities, all site accidents and incidents, disciplinary action, visits by external professional bodies such as the HSA, company news pertinent to the works and finally staff resources ensuring roles and responsibilities are constantly updated to accommodate holidays and changes of personnel.

4.2.3 Team/Sub Contractor Briefings

The site team will convene a safety meeting for all sub-contractors and operatives in order to review current activities, accidents and future activities, thus ensuring full consultation, co-operation and co-ordination by all parties and also providing a forum for feedback to senior site management of current affairs and suggestions for improvement to safe systems of work.

The minutes of these meetings will be formally recorded & are uploaded onto CMiC. The frequency of the meetings will be identified in the Construction Stage Health & Safety Plan.

Structure Tone is committed to ensuring the involvement and participation of workers in the implementation of relevant aspects of Health & Safety. The consultation of workers is a key requirement of an effective integrated management system as it enables Structure Tone to make informed decisions.

Structure Tone's implementation of Safety 360 within the organisation has helped the consultation of workers improve on our construction sites. This enables each site team to bring five workers of different trades (non-managerial personnel) to lunch to get their point of view across; this can be on site welfare, cleanliness, general attitude of workers on sites. The site team then review the above and take action if necessary.

In 2025 Safety 360 training was rolled out on sites for apprentices, persons under 20 and vulnerable workers.

Each project will be encouraged to participate in Safety 360 Good Incentive Scheme. This entails personnel being rewarded for good practices onsite. Please refer to Good Incentive Log for full details.

6. Structure Tone Procedures for Pre- Construction & Construction

5.1 When tendering

Make full allowance of time and resources demonstrating (with documentation) how the Health and Safety Plan will be developed to comply with all Health and Safety obligations. Please refer to the Management Systems Handbook for the full scope of procedures to be followed.

5.1.1 When appointed

- Develop the Health and Safety Plan prior to commencing work on site, taking into consideration the work and materials of all subcontractors and suppliers.
- Discuss with and advise subcontractors on contents of the Health and Safety Plan and give information of on-site risks to enable them to comply with Health and Safety obligations.
- Prevent unauthorised site access by fencing and posting of notices.
- Update the Health and Safety Plan throughout the life of the Contract.
- Provide the relevant information for the Health and Safety File.
- Provide site orientation training (training) for all site operatives, both subcontractors and employees, to ensure compliance with the relevant statutory provisions.
- Consider the risk to the safety, health and welfare of everyone on site taking into account the requirements of the COSHH, Noise at Work, Manual Handling and Personal Protective Equipment Regulations.
- Display notification to the HSA. Provide in writing on an approved form notice to the Authority the AF 1 form (issued by the PSDP) and the AF2 form issued by the PSCS.
- Obtain and assess method statements and risk assessments. Complete the 10-point STL check sheet and file under the Health and Safety folder (sections 1-16).
- Measure Health and Safety performance by completing regular site inspections and monthly SHEQ Audits. Report the findings to the site team and Directors.
- Ensure the consultation, co-operation and co-ordination of all parties who work within the site confines.

5.1.2 Actions to Protect Health, Safety and Welfare of those on Site

The Hierarchy of control measures will be reviewed and implemented for all aspects of works on the project. All RAMS completed must ensure the Hierarchy of Control measures is put into place. Control measures must be put into place to remove a hazard (eliminate) or at least reduce the hazard to an acceptable low level (minimise).

The General Principals of Prevention summary are as follows:

- Avoid the Risk- Can the hazard be eliminated or removed? Reduce the risk. Evaluate the risks at source- if the hazard cannot be eliminated then a risk assessment must be completed with all risks associated with the task risk assessed.
- Combat the risks at source- Deal with the hazard at the root.
- Adapt the work to the individual- arrange the workplace and tasks to take into account the employees and to reduce the effect of works on health.
- Adapt the workplace in line with technical progress- Continual review of processes taking place and the implementation of new systems where reasonable practicable.
- Replace dangerous systems with safer alternatives- Replace dangerous articles, substances or systems of work.
- Develop a prevention policy- Outline in the EHS Policy how the company will protect employees and other people from the hazards in the workplace.
- Give priority to collective measures- provide collective protection ahead of personnel protective measures.

5.1.3 The Pre-construction Information

The pre-construction information is provided by the Project Supervisor as part of the tender documentation providing tenderers with information about the project, and with details of potential risks to Health and Safety. Items in the plan will include: -

- Name of the Client
- Name of the Project Supervisor
- Details of the project (nature of construction work)
- Location
- Timescale for completion
- Site environment and surrounding land (i.e., any planning restrictions)
- Existing services, overhead and underground
- Existing traffic systems and restrictions (i.e., bridge restrictions, limits on deliverytimes, limits on parking times etc.)
- Existing structures (e.g., presence of asbestos, fragile materials etc.)
- Ground conditions (i.e., contamination, instability, subsidence, presence of mineworking's, underground obstructions etc.)
- Project design
- Hazardous construction details
- Heavy/difficult materials to be handled
- Other information pertinent to the project with potential risks to safety, health and welfare
- The Health and Safety Plan is developed, prior to the commencement ofworks.

5.2 The "Health and Safety File"

The file will have the details of relevant information of risks to Health and Safety, or potential problem areas to assist in subsequent alterations, repairs, redecoration, cleaning or eventual demolition.

Information for the file is to be provided to the project supervisor promptly to enable him/ her to update, review or amend the file accordingly. This information is to be provided by our sub- contractors and suppliers, to enable Structure Tone to fulfil our statutory duties. This is in addition to the information we have compiled for delivery to the PSDP Co-ordinator.

The project supervisor at the end of the project will give the completed Health and Project Safety file to the Client. If the Client disposes of his interest in the property, he/ she is required to deliver the file to the person who acquires the property.

The contents and required layout for the Project Health & Safety of the file should be included in the pre-construction information. However, the regulations specify the following items as the basic requirements of the File: -

- Records/drawings/plans with details of design criteria
- Details of construction methods and materials
- Details of the equipment installed, and maintenance facilities
- Maintenance procedures
- Operation manuals for plant and equipment
- Requirements and procedures for repairing and cleaning
- The nature, details and location of all services and utilities
- The location and details of all firefighting measures and emergency procedures
- "As-built" drawings

5.3 Risk Assessments

The Safety and Welfare at Work Act 2005 place duties on employers and the self-employed to take certain actions as summarised below:

1. Assess the risks to the health and safety of employees and any others who could be affected by work activities. This also includes contractors and temporary staff engaged for specific work. Relevant procedures must be specified to eliminate or minimise the risks. Generic assessments incorporated as arrangements within a safety policy document will be acceptable provided arrangements for identifying additional risks are in place.
2. Where the risk is considered to be significant, then this must be recorded inwriting and, where relevant, identify those groups of employees being especially atrisk.
3. Risk assessments should be reviewed and altered if they are no longer valid or circumstances have changed significantly.
4. Provide health surveillance where there is an identifiable disease or adversehealth condition related to the work concerned, provided

that it is able to be detected and there is a reasonable likelihood it may occur under working conditions.

5. Appoint one or more nominated competent persons to assist in complying with requirements.

6. Establish emergency procedures to be followed in the event of serious and imminent danger and nominate sufficient competent persons to implement evacuation procedures.
7. Provide relevant information to employees on the identified risks, the control measures to be taken, emergency procedures, names of competent persons, and risks where work areas are shared with other employers.
8. Co-operate fully with other employers where work areas are shared, by exchanging information on the protective measures and risks associated with each other's activities, and subsequently pass such information to employees in those areas.
9. Provide relevant training to employees in respect of:
    - Duties and tasks allocated to them.
    - Induction on first being employed.
    - When transferred to new work or given increased responsibility.
    - When changes in work equipment or methods are introduced.
    - The training must be repeated periodically and take account of changes, and also take place during working hours.
10. Assess the risks to health and safety of new or expectant mothers at workand undertake measures to avoid such risks.

Employees also have duties as follows:

1. Use anything provided by the employer in accordance with the instructions and training given. This includes machinery, equipment, dangerous substances, means of transport, plant and safety equipment etc.
2. Inform the employer (or nominated person) of any dangerous work situation or any matter that is considered to be a shortcoming in his employer's health and safety protection arrangements.

Definitions:

- Hazard - this is the potential for harm.
- Risk - this is the likelihood that actual harm will occur.
- Assessment of risk will take into account the severity of the hazard, the number of people likely to be exposed and the possible consequences.

General Procedure:

1. Identify the hazards and activities.
2. Assess the risks, i.e. what is the nature and extent of the risk?
3. Are existing control measures or precautions adequate?
4. Is there full compliance with the law?
5. Are any further precautions required?
6. Record the findings, and arrangements to be implemented if necessary.

Where the risks are generic the procedures laid down in the Sub Contractor documentation or in Structure Tone's Health and Safety Plan may be sufficient to cover the activity. However, the Site Management will need to review the activity and the proposed method of work and confirm the risks have been addressed. Documentation should be available on site for review and audit purposes.

The Hierarchy of Control measures will be reviewed and implemented for all aspects of works.

5.4 Standard Forms located in Health and Safety Plan

Standard Form Risk Assessment will be used when undertaking risk assessments on site. The form uses a quantitative method to identify the level of risk exposure and the residual risk being accepted by the person undertaking the assessment. The following steps are used to complete the form:

- Identify the Project.
- Identify the Task being assessed.
- Identify the Hazards (something with the potential to cause harm) and the considered Risks (exposure to the hazard) of undertaking the task.
- Who is exposed to the risk (Operatives, Members of the Public etc)?
- The Control Measures that will be in place to: eliminate, reduce or control the risk.
- Identify any training or health surveillance required.
- Review the risk with the Control Measures in place and consider: (a) what now is the likelihood of encountering an incident when undertaking the task? And (b) if an incident where to happen what are the likely consequences? Use the grid to evaluate the Residual Risk.
- Once the residual risks are identified if the values are LOW or below then the work can proceed as described. If the risk is MEDIUM then additional procedures are required before work commences to reduce the likelihood of an incident occurring, and/or minimise its impact if it did occur. If the residual risk is HIGH or above NO WORK MAY COMMENCE until the risk has been re- evaluated.
- Only Senior Managers or the SHEQ team can sign off risks of High or above after a re-evaluation.
- Identify the sources of information used to undertake the
- Risk assessment.

- The risk assessment should be signed by the individual undertaking it, dated and the persons it will be issued to identify. In the event of a re-evaluated High Risk it should be countersigned by the Senior Manager or SHEQ team.

5.5 Hazard Identification / Risk Assessments / Risk Control Procedures / Method Statements Assessment of Hazard (Severity):

H = Fatality / major injury or illness causing long term disability
M = Injury or illness causing short term disability
L = Other minor injury

Next the likelihood of the identified hazard occurring is assessed using the following criteria: - Assessment of Risk(Likelihood):

H = Certain or near certain
M = Reasonably likely to occur
L = Very seldom never

SEVERITY

LIKELIHOOD

	L	M	H
L	L	M	M
M	M	M	H
H	M	H	H

Risk Assessments

High Risk Operations and Method Statements

High risk operations will be identified at the contract pre-start meeting and a plan of action agreed, including identification and use of approved sub-contractors, arrangement of pre-start safety meetings in accordance with the company policy, and where possible utilisation of alternative methods/materials in order to reduce the risks likely to be encountered.

Once Site Management have reviewed the method statement their controlling supervisor will brief the operatives and written records kept on site, after which work will commence.

The method statement must be adhered to at all times and if the situation on site changes such that the conditions cannot be complied with then work will cease until an agreed amended method of working is formulated and the personnel involved re-briefed. A Safe Plan of Work can also be completed prior to any high risk activities being carried out to ensure all aspects of the work are discussed and briefed with the personnel.

Typical High Risk Activities include:

- Deep Drainage
- Steel Erection
- Roofing and Cladding
- False work and Scaffolding
- Confined Space Working
- Demolition work
- Contaminated Ground
- Asbestos Removal
- Handling of Dangerous Substances
- Work in Public Places
- Traffic Management
- Service Risers / Switch Rooms / Plant Rooms / any other areas deemed to be High Risk
- Temporary Works (temporary platforms, false work etc).

For certain High Risk Activities, the SHEQ team should be consulted to assist with the review of the proposed method of work.

5.6 Permit to Work Procedures

Permits to work have been formulated for the following activities: -

- General "General Permit to Work"
- Confined spaces - "*Permit to Enter*"

- Burning / Welding / Grinding and other work where there is a fire risk - "*Hot Work Permit*"
- Electrical Works – 'Permit to Work on Electrical Systems', 'Permit to Enter Riser'.
- Permit to Dig.
- Open Floor Void Permit

Copies of all permits can be found on Boxcore, Datascope & Internal Server (if required) T DRIVE Health and Safety, Permits.

Permits will be completed by the nominated member of staff via Boxcore or Datascope, who will be suitably trained and knowledgeable on the particular area of work- Depending on what permit has been issued, for a high risk permit the relevant Supervisor who will be responsible for briefing his/ her operatives on the precautions to be taken and ensuring sufficient equipment is provided and maintained throughout the works.

The works in progress will be monitored for compliance with the permit and method statement by Structure Tone Site Management.

5.7 Electrical Permit Procedure

Where work is required under an Electrical Permit to Work it must be issued by an authorised person and all precautions applied as stipulated on the permit and detailed within the works Method Statement.

The Electrical permit is defined as: -

"A form of declaration signed and given by a senior authorised person to a person in charge of work to be carried out on any earthed extra high or high voltage apparatus, for the purpose of making known to such persons exactly what apparatus is dead, isolated from all live conductors, has been discharged, is connected to earth and on which it is safe to work."

A Senior Authorised Person is: -

"A competent person over 18 years, adequately trained and possessing technical knowledge and appointed in writing by their manager to carry out specific operations and/or work on the system, including authority to issue and cancel electrical permits to work." A Senior Authorised Person may be either directly employed or sub-contract personnel.

5.8 Plant

All plant items to be worked on that could be made potentially live shall be identified on the Permit to Work and the appropriate key removed from the key cabinet and the key placed in a separate secure box. The key number should be identified on the permit.

All active permits to work shall be displayed in a clearly visible location in the site office. The requirement for an electrical permit to work shall be identified on the general permit.

An electrical permit shall be issued to remove a lock from each individual MCC isolator. Each lock and key set shall be numbered and identified on the key list to an individual device. Electrical permits to be issued to sub-contractor by authorised personnel only.

When an electrical permit is issued, the following procedure shall be followed: -

- The permit shall be filled in and approved via Boxcore or Datacope on behalf of Structure Tone by the authorised Electrical Supervisor.
- The permit shall be read and signed by the applicant via Boxcore or Datascope.
- Both parties shall witness lock removed from the isolator, and responsibility for safety of the equipment shall be the responsibility of the sub-contractor.
- The lock, key and original permit shall be kept together in a visible location in the site office.
- General permits to be signed off at the end of each day via Boxcore or Datacope.
- Electrical permits are to be kept open and signed off on completion of the work described. The sub-contractor shall ensure that equipment is left in a safe condition at the end of each day and should report status to the Electrical Supervisor.

6. Resources

Structure Tone will determine the necessary competency of workers that can affect/ or effect its occupational health and safety performance.
Structure Tone employees will undertake appropriate educational training with an outsourced independent body. Structure Tone will review experience, competency and knowledge of the site teams and where applicable additional training will be provided. See Training Matrix for further details.

7. Training Policy and Procedures

There are many hazards that arise from using incompetent and poorly trained personnel to undertake work activities. Many accidents at work stem from a miss-match between an individual's capability and training to perform the work activities required by his/ her job. Examples include incorrect use/misuse of hand and powered tools, personal protective equipment, access and egress etc.

7.1 At the Planning Stage

When planning all work activities there is a requirement to undertake risk and other assessments related to the work. One element that must be considered in such assessments, and in meeting the requirements of any health and safety plan developed for the work, is the competence of the personnel who will undertake the work.

In planning work the Project Director/ Manager/Construction Manager will ensure that the personnel detailed to undertake it meets the competence requirements specified in the assessment/plan. Where personnel are not competent then arrangements must be made to:

- Develop through training the required competence in individuals prior to the work commencing.

and/or

- Sub-contract the work activities to a contract organisation whose personnel do have the necessary competence. (This must be established prior to the contract being let as part of the contractor appointment procedure.)

In undertaking the allocation of work to each person there should be a clear

common understanding of what is expected of each individual in terms of the range of tasks and the standards to which they are to be performed. The standards not only include the quality of the work affected, but also the health and safety conditions and performance required whilst the work is being executed.

These competence requirements are not static and training needs will be generated by the requirements to:

- Acquire fresh skills, knowledge and experience.
- Understand and apply new techniques or work in an unfamiliar environment.
- Handle a new set of problems and decisions.
- Develop new competence in the shortest possible time.
- Adopt different approaches to work and meet new standards of quality.
- Improve flexibility and meet requirements for enhanced competence, for example, at Supervisor level.
- Meet changes in manpower resources as personnel leave and are recruited to the Company.
- Undertake the raising of skill levels and knowledge of new entrants to the levels required for full job competence.

7.2 Monitoring Training Needs Project Director/ Manager must:

Ensure that only competent personnel undertake the work activities under his/ her control. Where individuals display incompetence in the way the work is being executed then he/ she must take steps to rectify the situation by:

- Removal of the individual from the work activity until his competence level can be developed through training and experience to the level required.
- Improve the level of direct supervision of the individual by competent personnel experienced in the work activity detailing the limits of the individual's involvement in the work.
- Ensure that where new systems of work or changed techniques are being implemented then the required information and training is undertaken prior to the work activity commencing.
- Ensure that, where appropriate, refresher training is undertaken prior to executing work activities not regularly encountered. This will ensure those involved raise their competence level to that required by the work.
- Ensure that where personnel deputise for others that they are sufficiently competent to undertake the changed activities.

7.3 Control Measures

Before entrusting work activities to individuals assess their capability to perform the work to the health and safety standards and other criteria required.

Ensure that where deficiencies in competence are identified these are addressed by the provision of adequate training, development experiences and, where appropriate, the required level of supervision.

Ensure that appropriate refresher and re-training is undertaken to meet the needs of individuals and requirements of changing systems of work, new techniques and changing risk environments.

All Structure Tone staff will be trained to ensure adequate competency and knowledge; to ensure they are aware of the Integrated Management System including the hierarchy of control measures for the analysis of risk control measures. Structure Tone staff will ensure they review all work activities prior to and throughout the works process.

Structure Tone personnel will have the autonomy to remove themselves and others from work situations that they consider present an imminent and serious danger to their life or health, as well as the arrangements for protecting them from undue consequences for doing so. This is demonstrated through the implementation of the inhouse Safety 360 programme and relevant training. Project teams experience and knowledge will be reviewed at pre-tender stage, please refer to 4.2.1.

8. Accident / Incident Management Procedure

8.1 Introduction

All personnel employed on any Structure Tone Project will be encouraged to report all incidents that occur on their sites in a no blame culture. Such reports will be analysed to identify trends and improve working conditions with the overall objective of eliminating risk and reoccurrence of incidents of a similar nature.

All injuries, damage or near miss incidents, however minor, will be reported to the SHEQ team on Standard Form located in the Health and Safety Plan. This applies to incidents involving sub- contractors, visitors to the site, and members of the public or any other persons affected by our works.

8.2 Reporting

All Site/Project Managers shall be responsible for immediately reporting the following occurrences using Standard Structure Tone Forms.

- Any injury that is reportable to the HSA (Death, Major Injury or Over 3 Day Injury)
- Any Dangerous Occurrence Reportable to the HSA.
- Any injury or ill health resulting from work activities.
- Any injury resulting in lost time.
- Any injury requiring First Aid treatment.
- Any property damage including Company vehicle damage.
- Any Environmental Incident including those reportable under legislation.
- Any near miss which had the potential to cause one of the above.
- Any hazard that may have the potential to cause one of the above.

Any Reportable Incidents must be reported immediately to the SHEQ team.

It shall be the responsibility of all employees and contractors working for Structure Tone to report all incidents immediately to their Line Manager.

8.3 Investigation

Any investigation report is privileged information and must not be issued to any other person without permission of a Company Director.

8.4 Responsibilities

When an incident occurs, it is important to gather information that will enable us to establish the cause of the incident, the consequences and, where necessary, take action to prevent a reoccurrence. The following staff will have specific responsibilities under this procedure in addition to the responsibilities identified above:

8.4.1. Site Management

- Make the site safe and deal with any immediate risks.
- Ensure an injured person receives treatment.
- Report any fatality, major injury or injury to a member of the public requiring hospital treatment to the HSA by the quickest mean practical within 24hrs.
- Complete STL Accident form in full and return to the SHEQ team within 1 day (draft copy) with completed copy issued within 3 days.
- For all First Aid injuries ensure the Accident Log is completed and reported to your line manager and the SHEQ team.
- Take photographs of the incident location.
- On Reportable Incidents where possible preserve the incident location until the SHEQ team have been informed.
- Retain any items of plant or equipment etc. that were involved in the incident.
- Identify all documentation relating to the incident. (i.e. Risk Assessments, Method Statements, Permits etc.)
- Identify any witnesses to the incident and ensure they complete a Whiteness report is completed in the second section of the STL reporting form. Where there is a reportable incident involving a sub-contractor ensure they complete the required statutory forms.
- Assist the SHEQ team with their investigation. This includes closing out any actions identified in reports to prevent a reoccurrence.
- Where necessary inform the client or client's representative.

8.4.2. SHEQ Director

- Ensure any reportable incident has been notified to the HSA.
- Instigate a formal investigation of all reportable incidents.
- Distribute copies of a formal investigation report to the Site Management Team and the Managing Director.
- Ensure any actions are closed out within the specified time scales.
- Assist the HSA with any investigations they wish to undertake.
- Produce statistical analysis of accident and incident trends. Where necessary suggest action plans to tackle problem areas.

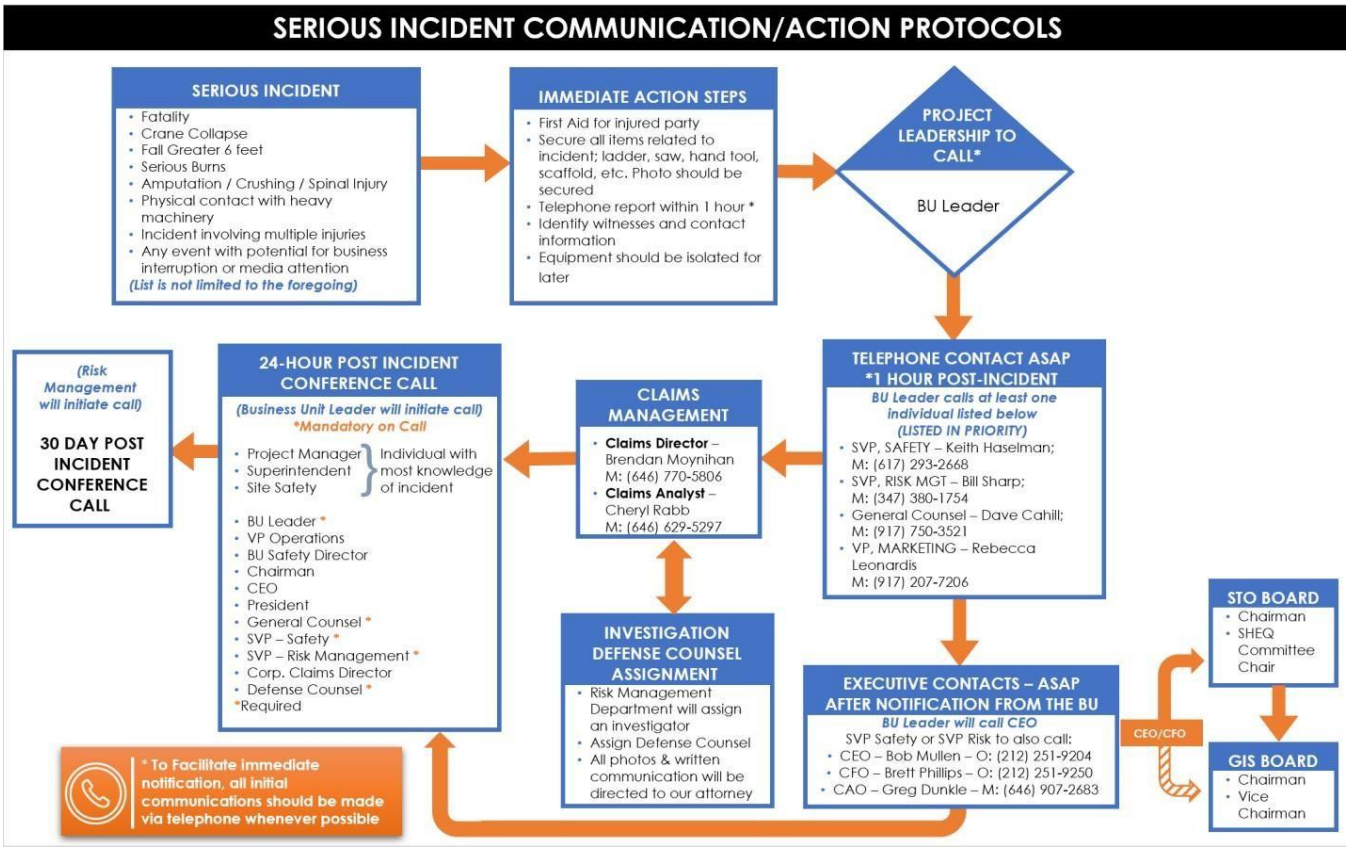
- Inform the Board of Directors of the Company's Accident/Incident Performance.

8.4.3. Directors

- Review reportable incidents at board meetings.
- Review accident/incident performance and where necessary ensure resources are made available to tackle problem areas.
- Ensure formal investigation reports are closed out by site management within the specified time scales.

8.4.4 Managing Director

The Managing Director James Reidy will follow Serious Incident Communication/ Action Protocols as outlined in the flowchart below.



8.5 Accident Logs (Books)

All injury incidents must also be recorded in the Accident Log that will be kept in the site and main offices. The Site/Project Manager will be responsible for ensuring all injuries are recorded on the Accident Log and duly signed off.

The completed Accident Report Form from the Accident Log will be returned to the SHEQ team with an Accident/Incident Report Form, immediately after the incident. The SHEQ team will make arrangements to keep all Accident Records for 3 years from the date of the entry.

9. Selection and Control of Sub Contractors

9.1 Objective

To define how Structure Tone selects and controls sub-contractors to be employed on our projects

9.1 Sub – Contract Selection

- Only sub-contractors that are on our Approved Supplier List can be employed to undertake work on our behalf unless written dispensation is sought from a Director.
- Sub-Contractors used on our projects will be approved in terms of the standard of their health and safety competence.
- To achieve approval, they must complete and return in full a Pre-Qualification form to the Commercial Department to demonstrate their ability to meet our safety standards.
- The purpose of the questionnaire and requested information is to ensure Sub-Contractors are aware of and understand all current health and safety legislation relevant to the work they are undertaking. The SHEQ Department conducts a regular review of Pre- Qualification forms, continual review of sub-contractors is conducted weekly/ monthly in the means of SHE inspections and HSEQ audits.
- Any Sub-Contractor removed from our Approved Supplier List will be required to resubmit an application.
- Sub-Contractors will be issued with Structure Tone's Pre-award document and will be expected to comply with them in full when carrying out their works.
- In addition to being on the Approved Supplier List Sub-Contractors may be required to demonstrate competence for a specific project or task in accordance with the requirements of the Construction Regulations 2013.

Responsibilities

- Project Directors
- Project Managers
- Construction Managers
- Site Managers
- Site Foremen/ Logistics Managers
- Quantity Surveyors

9.2 Sub – Contract Control

- All Sub-Contractors are to be informed that they are responsible for the health and safety of all aspects of their operations and must ensure that their management, employees, contractors and others acting on their behalf comply fully with Structure Tone's current policy, responsibilities and arrangements.
- Sub-Contractors are required to submit risk assessments, method statements and COSHH assessments in advance to Structure Tone's Site Management for verification.
- Sub-Contractors will be required to comply with the requirements of the Construction Regulations 2013. In particular:
- To co-operate with the Main Contractor,
- Pass the main Contractor information which will affect health and safety or is relevant to the health & safety file or is relevant to any statutory requirements.
- Comply with the directions of the Main Contractor and the rules in the health & safety plan, provide information and training to employees and
- To ensure that when arranging for any contractors to carry out construction work, they are competent and have made adequate provision for health and safety.
- Site Management have a responsibility to ensure Sub-Contractors undertake their work in accordance with our requirements and as detailed in their risk assessments and method statements. We must ensure that persons identified to undertake work are competent to do so and that where necessary the required certification is held. Copies of all relevant certification will be kept in the Health & Safety Plan.
- Sub-Contractors are required to provide evidence that plant and equipment brought to site is in good order, fully tested in accordance with current legislation and that any plant operators are competent and trained.
- Sub-Contractors operations will be included in Structure Tone's health and safety inspections and audits carried out by Site Management and the SHEQ team. A consistent failure to operate in accordance with our standards will trigger a Non-Compliance review by the SHEQ team.
- Where it is felt that a Sub-Contractor cannot demonstrate an ability to achieve to our health and safety standards, they will be removed from the Approved Supplier List. They will receive written notification of this decision.
- Sub-Contractors must inform Structure Tone of any accident/incident or near miss associated with their works on our projects.
- Structure Tone must ensure Sub-Contractors receive the relevant health and safety information in advance to enable them to assess their work so that they can allocate sufficient time and resource to undertake their work safely.
- At the end of each project the performance of the Sub-Contractors will be

reviewed, and the Approved Suppliers List will be updated.

Responsibilities

- Project Managers
- Site Management
- Quantity Surveyors

10. Communication and Consultation

10.1 Communication, Motivation and Discipline

Structure Tone systems are designed to ensure that all personnel on site have a clear understanding of what is expected what role individuals play and what happens if individuals do not co-operate. This is an essential part of any safety management plan.

10.1.1. New Employees

This procedure is to be carried out by the site/workplace supervisor/line manager of the site/workplace where the new employee will be required to work.

1. Explain to the new employee what he/she will be required to do and to whom he/she will be directly responsible.
2. Show the new employee where the company safety policy is kept, explain its purpose and ensure that the employee is aware of his/her responsibility. Explaining requirements of the site Health and Safety Plan.
3. Ascertain if the new employee has any disability, ill health or illness which could prevent him/her carrying out certain operations safely or require additional protective measures.
4. Show the new employee where copies of Regulations and the site Health and Safety Plan are kept.
5. All new office staff will undertake the office welcome pack and a buddy system will be implemented to ensure any queries or concerns can be answered or addressed. The Integrated Management System is introduced and defined for their role.
6. Undertake or arrange for the site induction training to be given to the new employee(s) and ascertain their existing competence level(s) identifying any immediate training needs required to be met before work tasks can be allowed. In particular, cover items 6-10 inclusive, below.
7. Warn new employee of any potentially dangerous areas of operation on site or in the workplace.
8. Warn the new employee of any prohibited actions on site or in the workplace, e.g. entering specific areas without a safety helmet, operating plant unless authorised etc.
9. If there is any training or instruction required, inform management, e.g. MSIC, PSCS, Occupational First Aid Responder & Scaffold Inspection, etc.
10. Issue to the new employee any protective clothing or equipment necessary,

e.g. safety helmet, goggles, ear defenders, wet weather clothing etc., and obtain their signature for the items issued. Ensure that the new employees understand how to use and wear the equipment/clothing correctly.

11. Show the new employee the location of the first aid box and explain the procedure in the event of an accident, in particular, the necessity to record all accidents, however trivial it may appear at the time.

Additional Procedures for New Employees Under 18 Years Old

The Supervisor must undertake a specific Risk Assessment for any new employee or trainee under 18 years old and record the findings. This information will be available for the parent or guardian to review if required. The Assessment will be held in the personnel files with the HR Department.

If the individual is to work on site, then the following additional precautions are required:

Inform employees that they must not operate any plant (including dumpers), give signals to any crane driver, and use any power tools or equipment unless being trained under the direct supervision of a competent person.

10.1.2 Site Inductions

All site personnel must attend a site-specific Safety Induction. Refer to the Construction Stage Health & Safety Plan for details of inductions.

10.1.3 Supervisors

All first line supervisors are made aware of their roles and responsibilities and in particular their major contribution to the management of safety, by the provision of appropriate clear instructions to the personnel under their control.

Such instructions will include: -

- Identification of job-specific risks
- Methods of work
- Handling and storage of materials
- Use of works equipment
- Use of personal protective equipment
- Structure Tone disciplinary procedure

Additionally, the first line supervisors on the contract attend a supervisor's safety meeting on site to
discuss, as a minimum, the following: -

- Site safety issues arising
- Future operations
- Co-ordination of operations within the works
- Means of maintaining Company Standards of Health, Safety and Welfare

Management Items above may form part of other site meetings where safety an agenda item.

10.1.4 Notice boards

Safety notice boards will be established in both the office area and the canteen, which will display relevant information for the contract, i.e.

- Company Safety, Environmental and Quality Policy
- Notification to Health and Safety Authority
- Location of the Construction Health & Safety Plan
- The Risk Assessment Information Notices
- Company Performance Reports
- Fire & Emergency Procedures
- Any Other Relevant Statutory Notices
- All relevant in-house health and safety information
- Identify who is/are the site First Aider(s) and Fire Marshalls.

10.1.2 Compliance

There is a formal procedure to be followed where disciplinary action is required as a result of failure to comply with the Structure Tone Management System. This system utilises An Improvement Notice (Yellow card) will be served upon a site, individual, or sub-contractor/partner where it is the opinion of Site Management that there is a failure to comply with the Structure Tone Management System without reasonable grounds.

The Improvement Notice will state; the issuer, the recipient, the shortcomings and recommendations for compliance, and copies held by the recipient, Safety Department, Project Manager and/or Construction Manager.

A Prohibition Notice (Red card) can be issued to; an individual, or sub-contractor/partner where it is the opinion of Site Management that there is a contravention of the Structure Tone Management System, and that failure involves, or will involve, a risk of serious personal injury.

If a Prohibition Notice is issued, then that task and associated operations will cease until a safe method of work has been submitted to and agreed by the issuing person(s).

The Prohibition Notice will state the issuer, recipient, contravention and possible remedial actions. In addition, the Prohibition has to be signed by the Issuer and Recipient, or Witness, as proof of receipt. The Notice remains in force until relevant actions are taken and submitted, in writing, for approval by the issuer. Only after the issuer has signed the completed Notice as acknowledgement of actions taken, may the conditions of the Prohibition Notice be removed, and related operations re- commence.

The Safety Department, as evidence of past performance, will hold records of Improvement Notices and Prohibition Notices. Any Sub Contractor who consistently accrues Improvement

Notices will be issued a letter of warning from the Safety Department requesting details of actions taken to improve their performance. Failure to comply with Structure Tone's procedures will mean removal from the Approved Suppliers List.

A CAP, or Corrective Action Plan will be put into placed as our attempt to help those trade partners improve the safety performance while significantly decreasing the number of incidents on our projects. During the prequalification of trade partners and including looking at safety statistics & performance on our projects, sub safety performance will be reviewed, and subs will be either approved to work or placed in a Yellow or Red CAP category based on the worse category performance which will require the implementation of a Corrective Action Plan. The CAP programme commenced in January 2025.

10.2 Consultation

10.2.1 Who is to be consulted?

Consultation must be with either:

- The employees directly, or
- Employees elected by a group of employees to act as their "representative of employee safety". [Note the use of this phrase to differentiate from trade union appointed "Safety Representative".]

Where "representative(s) of employee safety" are appointed, the employer must notify relevant
employees of those names.

10.3 Employers Duties

Where employees are NOT represented by a Safety Representative then employers must consult those employees in good time on health and safety matters, and in particular:

- When introducing measures which may affect health and safety
- The appointment of competent person(s)
- The provision of statutory health and safety information
- Any statutory health and safety training detail
- The health and safety consequences of new technologies.

The employer must provide such information to employees or representatives to enable their full and effective participation in the process, and to carry out their function as representative, where appointed.

Information may only be withheld if:

- it is against national security:
- such disclosure is in contravention of any prohibition by an enactment:
- it is of a personal (personnel) nature, unless consented:
- it is of significant commercial/confidential importance that its disclosure could cause injury to the business:
- it has been obtained for use in legal proceedings; or
- It is not related to health and safety.

Employers must also:

- Provide reasonable training to representatives of employee safety in respect of those functions, including travel and subsistence costs, if appropriate.
- Allow representatives time off with pay during working hours to fulfil the functions; and
- Provide representatives with reasonable facilities to fulfil their functions.

10.4 Functions of Representatives of Employee Safety

- Bring to the attention of employers any potential hazards and dangerous occurrences which could affect the group of employees being represented.
- Discuss with the employer general health and safety matters, and any information provided by the employer under these regulations.
- Represent the group of employees in consultation with HSA (or other Enforcing Authority) Inspectors.
- The Safety Rep responsibilities do not absolve the Legal responsibilities for the Construction team. The Safety Rep will be used to communicate any issues with Site Management if issues are brought to their attention by site personnel.

10.5 Communication Process

Structure Tone systems are designed to ensure that all employees & personnel on site have a clear understanding of who has the responsibility for internal and external communication. This is an essential part of any safety management plan.

Please see below table indicating the responsibility of such communication.

Potential External Interested Party	Frontline Responsibility / Authority	Back-Up Responsibility / Authority
Customers	Managing Director	Operations/ Project Director/ Pre-Con Director
Contractors	Managing Director	Operations/ Project Director
Suppliers	Managing Director	Operations Director
Insurers	Managing Director	Commercial

Potential External Interested Party	Frontline Responsibility / Authority	Back-Up Responsibility / Authority
Government Regulators	Managing Director	ALL dire
Health & Safety	Managing Director	Health & Safety Director/ PD OP
Media (Crisis)	Managing Director	Corporate
General Public	Managing Director	Operations Director/ALL
Environmental Groups	Managing Director	Operations Director/ EHS
Other: ISO	Managing Director	ALL

Communication Types

Type of Communication	Audience	Frequency	Owner	Location of Communication
Toolbox Talks	Internal Staff	Monthly	EHS Director	Company Network
	External Staff	Monthly	EHS Director	Company Network
	Client	When Requested	PD/ EHS	Company Network
Safety Bulletins	Internal Staff	When Required	EHS Director	Company Network
	External Staff	When Required		Company Network
	Client	When Required		Company Network
Company Communication	Internal Staff	When Required	Managing Director	Intranet/Email
	External Staff	When Required	Managing Director	Intranet/Email
Policies, Procedures and Forms	Internal Staff	Annually or ISO Standard Requirement Change	Managing Director/ Commercial Director / EHS Director	Intranet / Shared Drives
	External Staff	Annually or ISO Standard Requirement Change	Managing Director/ Commercial Director / EHS Director	Intranet / Shared Drives
	Client	When requested	Managing Director/ Commercial Director / EHS Director	Intranet / Shared Drives/ Email
	Subcontractors	Annually/Induction	Operations Director/ PD	Intranet /

Type of Communication	Audience	Frequency	Owner	Location of Communication
				Shared Drives/ Email
Audit Reports	Internal Managers	When required	EHS Director	Email

11.Company Offices (Not Including Site Offices)

11.1 Office Manager and Department Heads

The Office Manager or Department Head will be responsible for inducting all office-based staff on their roles and responsibilities in relation to office safety including fire precautions, workstation assessments, manual handling assessments and use of equipment.

The Office Manager or Department Head in conjunction with the SHEQ team will ensure there is an adequate Fire Plan for the Head Office. The plan will be reviewed annually.

11.2 Welfare Arrangements

The Office Manager, in conjunction with the SHEQ team, will ensure there is adequate provision made for Welfare. These requirements shall include:

- Ensuring there is adequate ventilation, heating and/or cooling and lighting.
- Ensuring there is adequate sanitary conveniences for male, female and disabled persons.
- Welfare facilities will have adequate washing facilities.
- Suitable drinking water will be made available.
- Facilities are available for rest, eating meals and changing clothing.
- Head Office is a No Smoking environment.

11.3 First Aid Arrangements

The Office Manager, in conjunction with the SHEQ team, will ensure there is adequate provision made for First Aid. These requirements shall include:

- The nomination of trained and certificated persons sufficient to provide the correct level of cover for the Head Office. The level of cover must for all times there is work undertaken in the office and will consider cover during holidays and sickness.
- Means of communicating the arrangements made to all employees, visitors, and contractors with reference to the emergency plan (fire and evacuation) where appropriate.
- A place or room set aside for the administration of simple first aid procedures (see

below).

- A means of recording on a suitable form the first aid treatment given. This should include patient's name/address, patient's occupation, date of entry, date/time of accident, place/circumstances of the accident, injury details and treatment given, signature of person making the entry.
- The maintenance of first aid materials at appropriate levels.

- First aid boxes located strategically throughout the workplace, particularly near to high-risk areas. Such boxes should be maintained to include:-

Materials	First-aid travel kit contents	First-aid box contents		
		1 to 10 persons	11 to 25 persons	26 to 50 persons[1]
Adhesive plasters	20	20	20	40
Sterile eye pads (no. 16) (bandage attached)	2	2	2	4
Individually wrapped triangular bandages	2	2	6	6
Safety pins	6	6	6	6
Individually wrapped, sterile, unmedicated wound dressings medium (no. 8) (10 x 8 cms)	1	2	2	4
Individually wrapped, sterile, unmedicated wound dressings large (no. 9) (13 x 9 cms)	1	2	6	8
Individually wrapped, sterile, unmedicated wound dressings extra large (no. 3) (28 x 17.5 cms)	1	2	3	4
Individually wrapped disinfectant wipes	10	10	20	40
Paramedic shears	1	1	1	1
Pairs of examination gloves	3	5	10	10
Sterile water where there is no clear running water[2]	2 x 20 mls	1 x 500 mls	2 x 500 mls	2 x 500 mls
Pocket face mask	1	1	1	1
Water-based burns dressing small (10 x 10 cms)[3]	1	1	1	1
Water-based burns dressing large[3]	1	1	1	1
Crepe bandage (7 cm)	1	1	2	3

[1] Where more than 50 persons are employed, pro rata provision should be made.

[2] Where mains tap water is not readily available for eye irrigation, sterile water or sterile normal saline (0.9%) in sealed disposable containers should be provided. Each container should hold at least 20 ml and should be discarded once the seal is broken. Eye bath/eye cups/refillable containers should not be used for eye irrigation due to the risk of cross-infection. The container should be CE marked.

[3] Where mains tap water is not readily available for cooling the burnt area.

Where mains tap water is not readily available for eye irrigation, sterile water or sterile normal saline (0.9%) in sealed disposable containers should be provided. Each container not be re-used once the sterile seal is broken.

Eye Baths/Eye Cups/Refillable Containers should NOT be used for Eye Irrigation

A place or room identified as a first aid room should meet the following criteria: -

- Be situated adjacent to sanitary facilities and on the ground floor (if practicable) to allow access for a stretcher, wheelchair or carrying chair. If possible, be fitted with some form of emergency lighting.
- Nominated first aiders should ensure that the place or room is kept stocked to the required standard and that it is at all times clean and ready for immediate use.
- The following facilities and equipment should be provided in first-aid rooms:-

  - Drink with running hot and cold water always available
  - Drinking water when not available on tap, and disposable cups
  - Soap
  - Paper towels
  - Smooth-topped working surfaces
  - A suitable store for first-aid materials
  - First-aid equipment equivalent in range and standard and quantities to those listed for a first aid box
  - Suitable foot-operated refuse containers lined with a disposable yellow clinical waste bags or a container suitable for safe disposal of clinical waste
  - A couch (with a waterproof protection) and clean pillow and blankets
  - Clean protective garments for use by first-aiders
  - A chair
  - An appropriate record books
  - A bowl
  - A telephone or other communication equipment

Where special first-aid equipment is required, this equipment may also be stored in the first-aid room.

Requirements of Staff when Working in our Offices

Generally, all personnel in the office will ensure that: -Access ways are kept clear of tripping/slipping hazards.

Fire escape routes are kept free from obstructions.

Electrical fittings/equipment are in good working order, free of obvious defects,

and are readily identified with a current test/examination tag.

Waste materials are not allowed to accumulate leading to a possible fire hazard.

All kitchen areas are kept in a clean condition.

All problems are reported to the responsible persons, details of who will be on office notice boards.

They do not attempt to move heavy/unmanageable items unassisted. Ask your Supervisor for the risk assessment detailing how such objects are to be moved.

See section 13 for First Aid arrangements on project sites.

12. Site Offices

Where applicable, site offices will comply with the requirements of any statutory regulations laid down by the HSA.

12.1 General Requirements

The Construction/Project Manager will ensure all fire precautions in accordance with Statutory Requirements shall be supplied and maintained.

All fire equipment shall comply with the relevant CURRENT STANDARDS and will be serviced and maintained at regular intervals. Training will be provided to members of staff in the use of the equipment.

The Construction Manager will ensure that all offices are cleaned out daily.

Any liquefied petroleum gas heating appliances shall be used in accordance with the requirements of company policy.

Any electrical installation shall be to the requirements of the General applications as laid down by the HSA and shall be installed, tested, altered and maintained by qualified electricians only.

The Construction Manager will ensure that any office machinery is installed safely and that it is
maintained and serviced in accordance with manufacturer's recommendations.

Training will be provided in the use of office machinery and no person may operate or service any machinery unless authorised to do so.

12.2 Welfare Requirements/ Planning

All work will be tendered for taking into account the requirements of all the relevant Regulations and other statutory requirements.

The welfare requirements for the site should be detailed in the Construction Health and Safety Plan

Welfare requirements should be established as soon as

possible, certainly before any demolition or construction work commences.

Where welfare facilities are to be shared between different contract organisations, arrangements and procedures for the proper use and maintenance of those Facilities must be developed and communicated to all parties sharing the facilities and recorded in the Construction Health and Safety Plan.

12.3 Monitoring of Welfare Areas

The Construction Manager will ensure that all planned welfare facilities required for the site are provided and that they are maintained to the required standard.

Where the company has arranged to use facilities provided by another contractor, the Construction Manager must ensure that they comply with statutory requirements and will also report to the contractor's management any deficiencies or failures to maintain them to the required standard.

12.4 Site Welfare Facilities

12.4.1 Sanitary conveniences

- Rooms containing sanitary conveniences shall be adequately ventilated and lit.
- Sanitary conveniences and the rooms containing them shall be kept in a clean and orderly condition.
- Separate rooms containing sanitary conveniences shall be provided for men and women, except where and so far as each convenience is in a separate room the door of which is capable of being secured from the inside.

12.4.2 Washing facilities

Washing facilities shall be provided: -

in the immediate vicinity of every sanitary convenience, whether or not provided elsewhere; and in the vicinity of any changing rooms required by paragraph (14) whether or not provided elsewhere

Washing facilities shall include: -

- A supply of clean hot and cold, or warm water, (which shall be running water so far as is reasonably practicable); and
- Soap or other suitable means of cleaning; and
- Towels or other suitable means of drying.
- Rooms containing washing facilities shall be sufficiently ventilated and lit.
- Washing facilities and the rooms containing them shall be kept in a clean and orderly condition.

Separate washing facilities shall be provided for men and women, except where and so far as they are provided in a room the door of which is capable of being secured from inside and the facilities in each such room are intended to be used by only one person at a time.
The above shall not apply to facilities which are provided for washing hands, forearms and face only.

12.4.3 Drinking water

Every supply of drinking water shall be conspicuously marked by an appropriate sign where necessary for reasons of health and safety.

Where a supply of drinking water is provided, there shall also be provided a sufficient number of suitable cups or other drinking vessels unless the supply of drinking water is in a jet from which persons can drink easily.

12.4.4 Accommodation for clothing

Accommodation for clothing shall include or allow for drying clothes.

12.4.5 Facilities for changing clothing

The facilities for changing clothing shall be separate facilities for, or separate use facilities by, men and women where necessary for reasons of propriety.

12.4.6 Rest Facilities

Rest facilities shall:-

- Include rest facilities provided in one or more rest rooms or rest areas;
- Where necessary, include suitable facilities for any person at work who is a pregnant woman or nursing mother to rest;
- Include suitable facilities to ensure that meals can be prepared and eaten; and include the means for boiling water.

12.4.7 Sanitary Conveniences

The following table shows the minimum number of toilets and washbasins that should be provided:

Table 1: Number of Toilets and Washbasins for mixed use (or women only)

No. of People at Work	No. of Toilets	No. of Washbasins
1 – 5	1	1
6 – 25	2	2
26 – 50	3	3
51 – 75	4	4
76 – 100	5	5

For more than 100 persons:
An additional water closet, and one additional washing station, should be provided for every 25 people above 100.

Project Sites Sanitary Conveniences:

Before work commences, the Construction Manager must make arrangements for the use by operatives of convenient sanitary facilities throughout the duration of the work.

- There must be at least one suitable sanitary convenience (not a urinal alone) for every 20 persons at work on the site.
- For larger sites (more than 100 persons) and where there is sufficient urinal provision, the ratio may be adjusted to one WC for every 25 persons up to the first 100 persons, and one WC for every 35 persons thereafter.
- In calculating required numbers, any number of persons less than 20 shall be treated as 20.
- Separate male and female sanitary conveniences must be provided or arranged so that there is separate use.

Each WC (other than urinal-only facilities) must:

- Be under cover, partitioned off, with a proper door and fastening to ensure privacy.
- Be adequately ventilated.
- Discharge into a mains sewer where practicable.
- Be conveniently accessible at all times to persons on site and,

where practicable, located close to washing facilities.

13. First Aid Arrangements for Sites

13.1 Planning

There will be a minimum 1No. First Aider for every 50 No. employees on every Structure Tone site. Additional first aid resources will be determined taking into account the nature of the work activities, number of employees, geographical spread of operations, and accessibility to accident and emergency services. This will ensure adequate and appropriate personnel and facilities to deal with emergencies as they occur.

In addition to this, the 11-50 person First Aid Kit will be on all sites, or multiples of these kits to meet the number of workforce present on site.

The Construction/Project Manager will establish the necessary first aid arrangements for the site determined by the expected risk environment, employee/contractor population, available local hospital facilities, and the requirement of the Construction Health and Safety Plan. In order to meet the requirements of Statutory Requirements for the provision of suitable person(s) to administer first aid, the Construction Manager/Site Manager/ Logistics Manager/ Site Foreman must ensure when establishing the site staff, that sufficient numbers of trained and certificated 'suitable persons' are appointed to the site.

Where the numbers of employees/contractors to be employed on the work is large, then consideration must be given to providing appropriate facilities to administer first aid such as a dedicated room in the office accommodation.

The Project Director/ Construction Manager/ Site Manager/ Site Foreman/ Site Logistics Manager will establish the necessary procedures and arrangements to: -

- Communicate the first aid facilities to all persons on site through the site induction procedure;
- Communicate the names of suitable person(s) to all persons on site;
- Ensure that first aid materials are replenished when used;
- Ensure the first aid facilities are not abused;
- Arrange all necessary first aid equipment, with guidance from the safety adviser if needed. The safety adviser can arrange the supply of materials if required.

13.2 Training Requirements

Appropriate first aid training and refresher training for personnel nominated as suitable person(s) will be provided to ensure that competence is established and maintained. If work processes require additional specialised first aid provision, then appropriate personnel must be trained for that requirement. Additional Cardiac First Responder training is provided to employees who do not require the full 3 day First Aid Responder course.

13.3 Monitoring First Aid

The Project Director/ Manager will ensure that all arrangements for first aid are established and that they are used and maintained to the required standards.

All personnel appointed as suitable person(s) must ensure that their certification remains current and must highlight any requirements for refresher training.

(Where the company is utilising arrangements made by the principal contractor then any deficiencies in that provision must be reported to the principal contractor).

Arrangements made for the use of first aid facilities by visitors or other contract organisations must also be monitored to ensure that the required standards are being provided.

The use of first aid facilities and materials should be recorded

First Aid Arrangements – Short Term Sites

Main Projects will comply with the same First Aid requirements as for the Head Office. The Project Manager/ Construction Manager will ensure that the site has adequate facilities necessary for the peak number of operatives working on the site.

Where short-term work is carried out moving from site to site, the following provision for first aid should be made:

- As a minimum, one member of each work team should be a nominated suitable person to administer first aid treatment. If dangerous equipment is being used, then at least 2 members should be so nominated.
- Welfare facilities must include the provision for washing and drying hands and adequate drinking water.
- If working in remote areas, the supervisor should have readily available,

details of the local hospital facilities for dealing with non-ambulance casualties.

- All members of the work team must be informed of the first aid arrangements.
- The use of first aid equipment/materials must be recorded as part of the company accident recording procedure. Used materials must be replenished as soon as possible to maintain the availability of the first aid provision.

13.4 First Aid Kits

The contents of first aid kits should be appropriate for the circumstances in which they are to be used. The large grab bag as provided by Medichem.

At least the following should be included: -

FABRIC ASSORTED PLASTERS 100s	1
WATERPROOF STANDARD PLASTERS 100s	1
STANDARD TAPE	1
STERILE WOUND WIPES 50S	1
BURN GEL 50ml	1
BURN DRESSING MEDIUM	2
BURN DRESSING LARGE	1
EYE WASH 20ML	5
STERILE WOUND DRESSING MEDIUM	2
STERILE WOUND DRESSING LARGE	2
STERILE WOUND DRESSING XL	2
STERILE EYE PAD	2
CREPE BANDAGE 7.5cm	2
CREPE BANDAGE 15cm	1
FOIL BLANKET	1
ANTISEPTIC SPRAY	1
TRIANGULAR BANDAGE	4
PAPER STITCHES	4
PARAMEDIC SHEARS	1
CONFORMING BANDAGE 7.5cm	2
INSTANT ICE PACK	4
LATEX GLOVES (10s)	1
SELF ADHESIVE DRESSING 10 X 10	4
APRON (DISPOSABLE)	3
SAFETY PINS	6

A Structure Tone Automated External Defibrillator (AED) will be provided where an existing AED is not based within the building or within the immediate vicinity.

Where sub-contractors have more than 49 employees on site they shall be required to provide an AED to the project and minimum of 1 trained First Aid Responder.

13.5 Fire Precautions

Every year there are numerous major fires on construction sites and in buildings undergoing refurbishment. All have serious consequences: people are injured; buildings, including those of historic interest, are destroyed. Plant and equipment is damaged, work is held up and completion dates are not met. The majority of fires can be prevented by designing out risks, taking simple precautions and by adopting safe working practices.

Structure Tone will therefore ensure that adequate detection and prevention measures are incorporated during the design and contract planning stage; and the work on site is undertaken to the highest standard of fire safety thereby affording the maximum level of protection to the building and its occupants.

Structure Tone will appoint in accordance with the Construction Regulations, a Fire Safety Co- Ordinator who will be responsible for assessing the degree of fire risk and for formulating and regularly updating the Site/Office Fire Safety Plan. The plan will detail, as a minimum:-

- The organisation of and responsibilities for Fire Safety.
- General site / office precautions, fire detection and warning alarms. The Technical Services Managers will coordinate and communicate with the Site Management teams to review the life safety systems within the building. This means reviewing the switching of heat heads to smoke heads. Isolating the life safety system temporarily and outlining the agreed procedures to be followed. Temporarily inputting a fire alarm system during the construction works.
- The requirements for a Hot Works Permit regime.
- Site/office accommodation-location, construction and maintenance.
- Fire escape and communications (including an effective evacuation plan and procedures for calling the fire brigade).
- Fire brigade access, facilities and co-ordination.
- Fire drills and training.
- Effective security measures to minimise the risk of arson.

- A materials storage and waste control regime.
- When finished surfaces or fittings incorporated into a building are to be temporarily protected during construction or refurbishment then in

  selecting a protective covering material regard must always be paid to the relative fire load and the potential for fire growth and spread.

13.6 Emergency Preparedness

- Please refer to Emergency Preparedness Procedures 2025 which can be found: *T:\3. Environmental Folder\1. Environmental Policy\2025*

- At the commencement of every new project the above document is communicated to the Site teams with each Site Environmental Manual and signed off.

- STL Head Office Premises Emergency and Fire Risk Assessment can be found on the T-Drive; T:\4. Health and Safety\4. Head Office Safety\2025

14. Food Hygiene – Kitchens & Canteens

The main hazards associated with the work and the areas involved are: -

- Dangerous machinery/appliances - electricity, gas, steam, hot water, mincers, slicers, mixers etc.
- Use and safe storage of sharp knives etc.
- Manual handling of hot pans, vessels etc.
- Fire from hot fats/oils
- Burns from hot surfaces
- Food hygiene and personal cleanliness

14.1 Planning

The workplace manager will ensure that registration of the premises is carried out, if relevant. This may also apply to canteens on construction sites where food is prepared/handled on the company's behalf.

Arrangements will be made for the training of staff concerned, not only for the use of dangerous machinery but also in food hygiene aspects, and relevant records will be kept.

Requirements of the relevant standards will need to be considered in respect of temperature control for food storage together with any other needs for protection from both mechanical and electrical hazards, and regular inspection procedures will be arranged.

Where contract staff are employed then allocation of responsibilities will be clearly defined.

14.2 Monitoring

Supervision will ensure that protective equipment is available and used, and that all relevant protective devices and machinery guards are in place and operating correctly.

Staff training will be provided, and the supervisor will monitor work to ensure that only trained personnel carry out those operations for which training is required.

The supervisor will also monitor the regular inspections of the areas and ensure that good hygiene and safety precautions are observed.

The supervisor will ensure that the first aid and fire-fighting facilities are maintained and are appropriate for the work area, together with appropriate hygiene facilities.

14.3 Training

Training will be provided to those staff required to use or clean machinery or equipment. Training will also be provided to that staffs that is required to prepare or handle food.

Records will be kept of all training given.

14.4 Controls

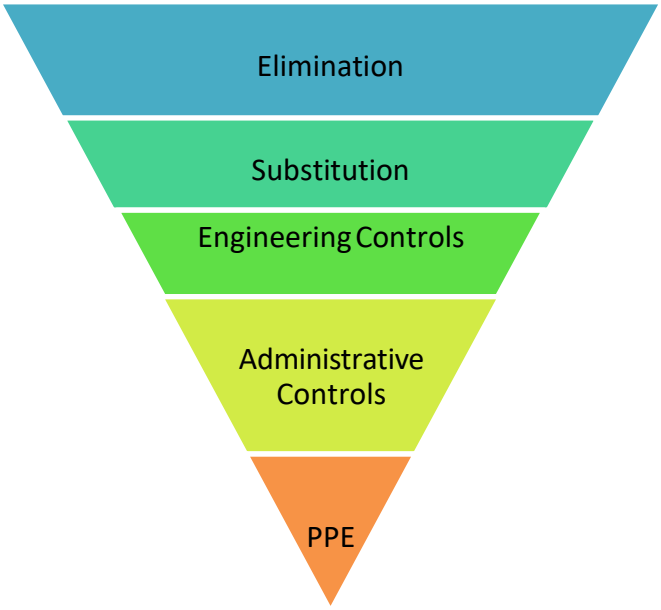
- Ensure all machines have been fitted with relevant guards, and these are in place before work starts. Follow any instructions or notices. Ensure work areas are adequately lit and ventilated.
- Ensure washing facilities with running hot and cold water are available and are equipped with soap, nailbrush, hand dryers etc., and are separate from food/equipment washing facilities, but close to the preparation areas.
- Machinery should be switched off and isolated before carrying out any cleaning or maintenance.
- Ensure machinery and electrical equipment are regularly checked and maintained and tested as required. This also includes the correct operation and temperature control of refrigerators, ovens etc.
- Report any faults promptly and do not use equipment if it has any fault which could cause a risk to health and safety.
- Report suspected gas leaks immediately and switch off gas valves before leaving the area. (DO NOT OPERATE ELECTRICAL SWITCHES)
- Keep the work area and machines, clean and tidy. Preparation and storage surfaces should be smooth, non-absorbent, easy to clean and pest proof.
- Clear up spillages promptly.
- Ensure that training has been given where the use of any hazardous chemicals e.g. cleaning materials, and relevant assessments are available. Do not mix different chemicals together unless it is known and agreed that they are able to be mixed safely.
- Take special care with any equipment or utensils which have sharp blades. Use protective equipment and clothing provided.
- Take special care when working near hot surfaces, equipment or food preparation. Ensure there is sufficient space for work to be carried out.
- Use the correct equipment for the job; keep knives etc., stored in appropriate racks or sheaths.

- Take care when using microwave ovens and follow cooking instructions carefully especially when using covered/sealed containers.
- Ensure first aid facilities, including clean, waterproof plasters are readily available and report accidents promptly.

15. Risk Assessments

OH&S RISK ASSESSMENTS-

Hierarchy of control must always be considered when carrying out a risk assessment for all employees (office & site based), visitors, client, landlord, design team, subcontractors and for all work activities. There are five main elements to the hierarchy of controls these are as follows:



Structure Tone will continually review all aspects of work to ensure the hierarchy of control measures are adhered to. This will be established by completing specific risk assessment and method statements for all projects.

All Structure Tone site management will review and record the assessment on a check sheet to determine the status of the RAMS provided until the project is completed.

To ensure the hierarchy of controls are being completed correctly Structure Tone will complete regular site inspections and audits to ensure compliance. Regular training will be completed with all site teams to ensure they are competent and knowledgeable of the procedure

Work areas must be adequately reviewed and assessed by all operatives i.e. Site Supervisors, Contractor Supervisors, Structure Tone Staff etc. This non exhaustive list and applies to all on site.

15.1 Risk Assessment Table

All Risk Assessments are readily available on the T-Drive:
T:\4. Health and Safety\3. Health and Safety Documents and Procedure\4. Risk Assessments
& can be found saved as a separate document titled Structure Tone Risk Assessments.

No	Hazard
High	
1	Demolition / Refurbishment
2	Electricity
3	Entry into Confined Spaces
4	Fire
5	Ladders
6	Manual handling and Lifting
7	Mobile Scaffolds
8	Site Tidiness
9	Welding
10	Working at Height
11	Temporary Works
12	Dust
13	Loading & Unloading of Materials
14	Crystalline Silica
15	Safety Critical Workers
16	Employee Risk Assessment
17	COVID-19
18	Lift Installations
19	Construction Mobile Plant
20	Lorry Mounted Cranes
21	Mobile Cranes & Tower Cranes on Site
22	Riser Procedures
23	Gas Works
24	Excavations
50	Tower Crane Rescue
Medium	
25	Portable Appliance Testing
26	Abrasive Wheels
27	Health Hazards

28	Noise
29	Permit to Work
30	PPE
31	Pressure Testing and Commissioning
32	Site Set up
33	Driving for Work
34	Working Under Pressure
35	Subcontractors
36	Vibration
37	Dermatitis
45	First Aid Requirements
47	Underground & Overhead Services
48	Programme Demands
51	Young Person on Site
52	Vulnerable Workers on site
Low	
38	Cartridge Tools
39	Hand Tools
40	Purchased Materials
41	Weil's Disease
42	Working in the sun
43	Asbestos
44	Visual Display Units
46	Chemicals
47	Programme Demands
48	Intoxicants in the Workplace
49	Crane Operations
50	Young Person on Site
51	Vulnerable Workers on Site
52	Use of Pallet Truck
53	Use of Pallet Truck

16. Appendices

16.1 Appendix A – HSA Disclaimer Occupational

Safety and Health Legislation in Ireland

The Health and Safety Authority is required, under section 57 of the Safety, Health and Welfare at Work Act 2005 (No. 10 of 2005) to keep under review safety and health legislation (relevant statutory provisions) and other statutes (associated statutory provisions) that have a bearing on occupational safety and health. The Authority will submit such proposals to the Minister for Labour Affairs, as appropriate, from time to time. A wide range of occupational safety and health and dangerous substances legislation and associated codes of practice are administered and enforced, in whole or part, by the Health and Safety Authority.

Disclaimer

Some pieces of legislation are available in full text here on the HSA site. These documents are intended for reference only.

All official copies of legislation should be available from,

Government Publications Sales Office
Sun Alliance House
Molesworth Street
Dublin 2
Tel: (01) 647 6000