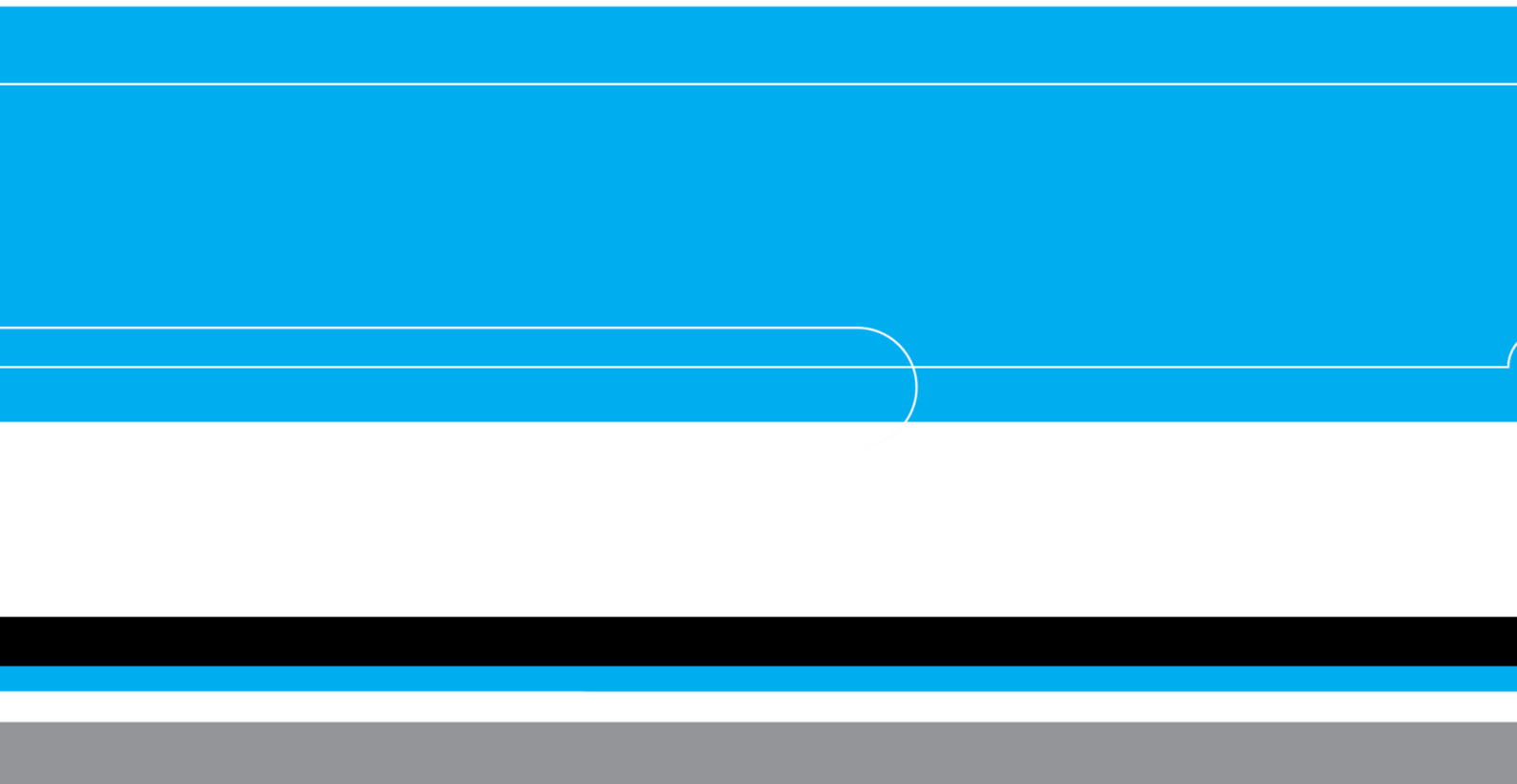


VolkerServices HSEQS Policy and Practice

August 2019



HSEQS POLICY STATEMENT

VolkerServices consists of a range of specialist functions which provide support to the wider VolkerWessels UK (VW UK) group of companies: VolkerFitzpatrick, VolkerHighways, VolkerRail, VolkerStevin and VolkerLaser. The functions include business critical support services such as Finance, HR, Fleet & Facilities, Learning & Development, Procurement, ICT, Corporate Communications and Corporate Responsibility.

VolkerServices considers Health & Safety, Environmental, Quality and Sustainability management to be core business values which are embedded within all other business objectives. Our core values enable a culture which places health, safety and welfare at the centre of our planning, management and monitoring. The board of VW UK, and those with specific duties for health and safety, are responsible for ensuring the integrated management system meets its intended outcomes and the protection of everyone working on our behalf.

VolkerServices treats the need to prevent accidents, injuries and ill-health as a top priority and supports the general health and well-being of its employees and others affected by the company's activities. Priority is given to the assessment of risk and the provision of appropriate control measures, information, instruction and training. The company strives to prevent adverse environmental impact and to continually improve overall environmental performance through the reduction of waste, reuse and recycling of materials, the prevention of pollution, and the reduction in our relative consumption of energy and our carbon footprint.

VolkerServices seeks to develop strong business relationships and improve the quality of our delivery.

VolkerServices' top management is committed to review and improvement of health and safety, environmental and quality performance, including implementing new guidelines and requirements in its endeavour to achieve industry best practice. Objectives and targets will be established and reviewed according to the nature of our activities, business and other legal requirements to ensure continual improvement in our performance. Adequate resources, commitment and the participation of all employees will ensure the continuation and development of a positive HSEQS culture.

To implement this policy, VolkerServices will:

- Maintain Health & Safety, Environmental and Quality management systems compliant with the requirements of BS ISO 45001:2018, BS EN ISO 14001:2015 and BS EN ISO 9001:2015 and continually improve these systems, processes and delivery
- Comply with all relevant health & safety and environmental legislation, corporate and other requirements to which we subscribe
- Make sure that the causes of any accidents or ill-health that may arise from its activities are, wherever possible, identified, understood, and either prevented or controlled
- Promote the health and wellbeing of all staff by educating employees on preventative measures that can be taken, and how to deal with issues as and when they arise
- Provide employees with the necessary support to effectively handle the demands and pressures of work through encouragement, sponsorship, line management and colleagues to enable a healthy work-life balance and ultimately lead to improved individual and organisational performance
- Seek to minimise the adverse impacts of our operations on local communities and the wider environment, wherever we have an influence
- Seek to fully understand the needs and expectations of our customers
- Maintain strong relationships with our interested parties, work collaboratively to continually improve the quality of our delivery and the sustainability of our business
- Provide our employees, and others working on our behalf, with the appropriate information, training and support needed to develop their skills, knowledge and experience

All employees and others working for VolkerServices are required to comply with this policy. In particular, by cooperating and carrying out activities safely, and in such a manner that does not intentionally or recklessly interfere with, or misuse, anything provided in the interest of health, safety or welfare or endanger the environment or negatively impact the quality of works or products. It is the responsibility of VolkerServices' management and supervisory staff to ensure that this policy and its arrangements are implemented.

This policy will be reviewed annually and revised as often as may be deemed appropriate by VolkerServices and then brought to the attention of all employees. It is accessible to interested parties via the VW UK website, Workspace, noticeboards, reception areas and is available on request.

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INTRODUCTION

This document describes the arrangements in place to put into practical effect the commitment made in the HSEQS Policy Statement. It outlines the Integrated Management System (IMS) operated by VolkerServices, based on the requirements of ISO 45001, ISO 14001, ISO 9001 and applicable legal and corporate requirements. This HSEQS Policy and Practice is applicable to all VolkerServices' offices and facilities.

The board of VW UK is committed to maintaining high HSEQS standards throughout the group's operations. Company requirements are designed to secure, so far as is reasonably practicable, the health, safety and wellbeing of those affected by our activities and the environment within which we operate.

VolkerServices fully supports the aims and objectives of the Health and Safety at Work etc. Act 1974, Environmental Protection Act 1990, the associated statutory provisions, and will cooperate fully with the requirements of the Health and Safety Executive (HSE), Environment Agency (EA) / Scottish Environmental Protection Agency (SEPA) / Natural Resources Wales (NRW) / Northern Ireland Environment Agency (NIEA), Local Authorities, and other regulatory or enforcement bodies.

The IMS has been developed around internationally recognised quality management principles: customer focus, leadership, engagement of people, process approach, continual improvement, evidence-based decision making and relationship management.

The IMS incorporates relevant policies, procedures and guidance for employees of VolkerServices. Through effective application of our IMS, continual improvement of the system and assurance of conformity, we aim to enhance our customer satisfaction and improve performance. The IMS is available electronically through our business management system, Workspace.

Formal amendment to this document is the responsibility of the Corporate Responsibility (CR) Director with the approval of the VW UK board of directors. This document is available to all employees and any other interested parties via Workspace. Staff appointed responsible for the management and implementation of HSEQS requirements are required to ensure that a copy is displayed in offices.

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1.0 ORGANISATION AND ARRANGEMENTS

1.1 ARRANGEMENTS FOR IMPLEMENTATION OF THIS POLICY

Our aim is to plan activities and implement control measures to ensure compliance with relevant statutory provisions and client requirements associated with our works. We seek to do this in such a way that we avoid the need for complaint, issue of enforcement (improvement or prohibition) notice, or prosecution.

The company will achieve the aims and objectives of this policy by:

- Maintaining compliance to relevant health, safety and environmental legislation
- Identifying hazards and assessing the risks to health and safety in the workplace together with the provision and maintenance of adequate control measures
- Assessing our environmental aspects and impacts, together with objectives and targets identified and recorded in accordance with company procedures
- Providing clearly defined safe systems of work and communicating them in sufficient detail to those affected
- Paying particular attention to the provision of safe access and egress
- Minimising use of the earth's resources through appropriate planning, reuse or recycling procedures, as well as using materials from renewable sources wherever practicable
- Mitigating the environmental impact of our operations by paying particular attention to the concerns of the local and wider community that could be affected
- Establishing emergency procedures and ensuring they are under the control of competent people
- Controlling use of hazardous substances
- Ensuring adequate and appropriate protective equipment is provided where deemed necessary
- Selecting or establishing offices and other facilities which utilise water and energy saving technologies
- Maintaining high standards of hygiene, cleanliness and housekeeping
- Ensuring the occupational health and mental wellbeing of employees, carrying out appropriate health surveillance
- Providing appropriate equipment which is tested, certificated and safe to use
- Displaying and communicating written or pictorial information as may be necessary to assist in the implementation of safe practices
- Selecting and training personnel, providing information, instruction and supervision as may be necessary at all levels; paying particular attention to personnel attending a location for the first time or on a temporary basis
- Making arrangements for consultation between management and employees
- Encouraging HSEQS awareness among staff, suppliers and stakeholders by working with companies whose attitudes reflect our own and increasing awareness through appropriate training
- Monitoring and reviewing performance
- Reporting and investigating accidents, disseminating findings and where required revising arrangements and procedures
- Applying and sharing company / industry best practice at all of our sites and offices wherever we have an influence
- Being forward thinking in terms of HSEQS by reviewing our policy in line with the latest concerns as they unfold in the everyday world

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1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.2 STRUCTURE OF THE IMS

To operate in a consistent manner, and to meet legal, corporate, client and other requirements we maintain an IMS which includes all the VW UK policies, procedures, forms, standards, and reference information.

The VW UK IMS supports the implementation of this policy and practice. It is stored on Workspace and provides access to:

- Policies and procedures
- Forms, process maps and guidance documents
- Legislation registers
- Alerts and bulletins
- Objectives and targets
- HSEQS performance reports
- HSEQS and other related databases
- Best practice guidance
- Links to external, web-based HSEQS guidance and technical support (e.g. IHS reference material)
- Subcontractor interfaces, selection and performance standards / appraisals

1.3 MONITORING AND REVIEW

This policy and practice will be monitored and reviewed by:

- Internal and external verification, audit and monitoring of our activities
- Safety performance monitoring (hazards, near misses, accidents etc.)
- Comparison with current, new and proposed legal requirements or best practice, and
- Meetings carried out with directors, senior managers and HSEQS management

1.4 LEADERSHIP

Leadership and commitment is demonstrated throughout various levels of management. From the VW UK board, senior management team and departmental heads to the support specialists, line management functions and team leaders.

The roles that fall within VolkerServices' top management for HSEQS are:

- The VW UK Chief Executive Officer (CEO)
- The VW UK Corporate Responsibility Director

Top management responsibilities include:

- Developing the HSEQS policy and objectives for VW UK, and ensuring that the correct organisational structure and resources are in place to support these goals
- Promoting the HSEQS policy and objectives to employees and other relevant stakeholders to increase awareness, motivation and involvement
- Ensuring that the goals and responsibilities for individual employees reflect our overall objectives
- Ensuring a process approach to all management activity, and that risk / opportunity based thinking is applied appropriately to all activities
- Demonstrating leadership and engagement within the application of the IMS across the business
- Ensuring the business correctly focuses on the needs of its clients and other interested parties
- Ensuring the IMS is implemented to meet the needs of VolkerServices, its clients and other interested parties
- Reviewing the IMS periodically
- Identifying ways in which to improve HSEQS performance

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1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.5 ROLES AND RESPONSIBILITIES

Different roles have varying levels of authority with regard to HSEQS and the IMS, and are explained as follows:

VW UK CEO

The VW UK CEO holds overall responsibility for the operations of VW UK, from developing long-term strategy for the business to overseeing its day-to-day activities. The CEO is ultimately responsible for the company's HSEQS performance and, together with the VW UK CR Director, ensuring the setting and implementation of realistic goals in relation to HSEQS matters.

Corporate Responsibility Director

The CR Director is responsible for the implementation and development of sustainable business practices throughout the VW UK group and maintaining compliance to corporate, legal, and stakeholder requirements. Reporting to the VW UK CEO, the responsibilities of the CR Director are:

- Oversight of health, safety, environment, quality and sustainability activities and staff across VW UK business units
- Oversight of corporate governance and risk management
- Development of CR strategy through a strategic view of the business environment
- CR management reporting and communication within VW UK and to VW
- Management of any applicable memberships, affiliations and registration schemes relevant to HSEQS
- Monitoring, review and formal amendment of the IMS
- Ensuring that IMS documentation is appropriate and maintained to reflect any changes in legislation and company requirements
- Playing a key part in improving HSEQS performance across the VW UK companies
- Provision of technical services and compliance support to all of the VW UK companies
- Provision of occupational health services to all of the VW UK companies
- HSEQS manager for shared services
- Provision of HSEQS briefings to shared services staff
- Commitment to the growth and development of employees, including the delivery of training services and external course provision
- Development of sustainable business practices including the selection and integration of tools and techniques
- Understanding the role of government, business, NGOs, society, global and local issues and how they interact with each other and their impact on VW UK
- Development of systems and protocols, including IT platforms, to support the needs of VW UK
- Acting as lead officer for major incident response and the provision of legal support services
- Ensuring thorough investigations are carried out and appropriate records are compiled where incidents do occur, and make recommendations to prevent recurrence
- Represent VolkerServices in communications with the EA / SEPA / NRW / NIEA, Local Authorities and other external enforcement authorities or organisations
- Adhere to the professional code of conduct as set through membership of the Institute of Occupational Safety and Health (IOSH), International Institute of Risk & Safety Management (IIRSM), Institute of Environmental Management and Assessment (IEMA), the Chartered Institute of Wastes Management (CIWM), and the Chartered Quality Institute (CQI)
- Identify opportunities for improvement and share best practice from across the business and industry

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1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.5 ROLES AND RESPONSIBILITIES (CONTINUED)****Senior IMS Manager**

Reporting to the CR Director the Senior IMS Manager is responsible for:

- Implementation, management, and review of the IMS and other interrelated systems
- Development, coordination and management of activities related to the implementation and maintenance of the IMS
- Monitoring, review and amendment of IMS documentation as necessary
- Controlling, publishing and maintenance of the IMS within Workspace
- Supporting and monitoring the effective application of the IMS in terms of compliance across VW UK companies
- Carrying out auditing in accordance with company procedure Q03 *Audit* to ensure compliance with existing requirements

Commercial, Estimating and Procurement Managers

It is the responsibility of the Commercial, Estimating and Procurement Managers to:

- Ensure subcontractors and suppliers working on behalf of VolkerServices or the wider VW UK group are aware of the relevant HSEQS Policy and Practice document
- Ensure that the Procurement Policy is communicated to all subcontractors and suppliers
- Check the HSEQS performance of suppliers and subcontractors in relation to accidents, incidents, regulator liaison, fines and court proceedings relating to HSEQS offences prior to contract award
- Check any relevant health and safety, environmental or quality certifications and the performance of suppliers and subcontractors
- Arrange audits of suppliers and subcontractors as required
- Be familiar with statutory provisions relating to ethical and responsible procurement for specific contracts
- Understand the environmental resourcing and monitoring requirements when tendering, or supporting a tender, for a contract

Shared Services Departmental Heads

It is the responsibility of the departmental heads to:

- Establish the processes and procedures for their areas of responsibility and incorporate them within the IMS, in accordance with procedure Q01 *Control of Documented Information - Overview*
- Ensure staff are aware of, and implement, the parts of the IMS applicable to them
- Train, support and mentor their direct staff to develop their knowledge and application of the IMS
- Provide leadership and encourage active participation of their staff in improving HSEQS performance
- Be instrumental in creating a workplace with a positive culture that supports the production and delivery of high quality products and services with zero defects
- Inform, guide and support staff to create workplaces with a positive attitude to health, safety and environmental management

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1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.5 ROLES AND RESPONSIBILITIES (CONTINUED)****All employees, subcontractors and any other persons working on our behalf**

It is their responsibility to:

- Be familiar with the HSEQS Policy and Practice document and cooperate with management / supervision in its implementation
- Understand the parts of the document applicable to them and take reasonable care for themselves and others
- Follow the instructions given regarding safe working in general and safe methods of work for particular tasks
- Keep equipment in good order, use the correct equipment for the task and report any defects in equipment or any shortcoming in safe systems of work to their manager / supervisor
- Contribute to the safety culture, be aware of relevant safety rules and abide by requirements
- Use and not abuse the protective equipment and measures provided in the interests of health and safety
- Be instrumental in creating workplaces with a positive culture that support the production and delivery of high quality products and services with zero defects

1.6 TRAINING

Appropriate training will be identified and provided to all levels of VolkerServices' employees. Training may comprise of HSEQS inductions, in-house training courses and specialist external training courses.

Training requirements are assessed both at commencement for new employees and on an on-going basis for existing employees. The capabilities and expertise of our management / supervisory employees is assessed at annual Development and Performance Reviews (DPRs). Individual training requirements are identified through DPRs or requested by individuals responsible for an activity.

1.7 CLASSIFICATION OF WORKFORCE

VolkerServices aim is to ensure the health and safety of its employees whilst at work and that any health issues are identified and addressed. In doing so it is recognised that not all employees are exposed to the same level of risk. Accordingly, employees can be considered in the following two categories in terms of personal or workplace safety issues:

- Office and administration roles
- Safety critical roles

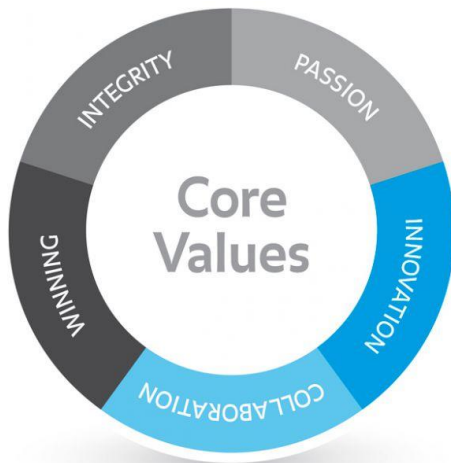
An in-house occupational health service is available from the Occupational Health Department. The level of service provided will be based on a health questionnaire and assessment of risk for each group.

1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.8 CORE VALUES AND THE VANTAGE MODEL

Our Core Values

Our core values define our organisation's ethics and guide our decisions, actions and behaviours, which results in best in class delivery, quality and people. All VW UK operating companies share the same philosophy and core values. This common set of values offers clear benefits to all our stakeholders and in turn gives them the confidence to trust in our company and people.



Integrity

We are open and totally honest; our business is ethically and morally strong and each of us is accountable.

Passion

We are committed in heart and mind and enjoy what we do.

Innovation

We strive to be ahead of the game by continually improving the way we do things for ourselves and our clients.

Collaboration

We collaborate in all aspects of our business, we work as a team to take advantage of our collective genius so that we succeed together.

Winning

We never settle for second best; we always deliver high quality work and we strive to exceed expectation.

Our Vision for the Future

VW UK's vision is to be the construction contractor of choice by always exceeding our stakeholders' expectations.

By continually investing in our people we achieve the highest quality of service delivery for our clients and stakeholders. To support our ongoing growth and development, we have identified the following focus areas, in the form of our 'Vantage Business Model'.

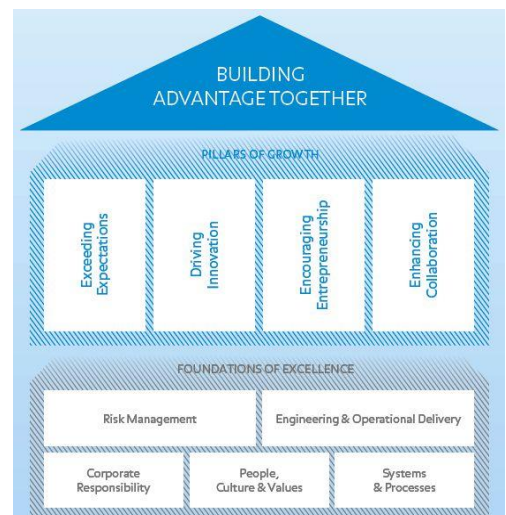
At the base of the model are the foundations that underpin everything we do. These include good corporate responsibility and health and safety, our talented and dedicated people, our core values and the strong systems and processes which support our work.

The second layer of our foundations is what we believe makes a successful contractor really stand out. It is about balancing risk management with engineering and operational delivery.

To drive our performance further, we have identified some areas that we believe are key to VW UK. By targeting these pillars individually, it will give us the advantage in the marketplace to become the contractor of choice.

Exceeding expectations means being industry leading in efficient delivery for all our stakeholders. Driving innovation is about bringing innovative solutions to the forefront. We want our people to look for innovations in engineering solutions and to think outside the box. Encouraging entrepreneurship is giving our people the confidence to come up with new solutions; to be innovative and explore new lines of business and markets.

Enhancing collaboration means working together internally, with our partners and supply chain to come up with optimal solutions.



1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.9 INTEGRITY AND BUSINESS ETHICS**

VW UK is absolutely committed to preventing slavery and human trafficking in its corporate activities. Our statement of compliance with the Modern Slavery Act 2015 sets out actions to understand the potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains. This commitment is also made in our Responsible Procurement Charter.

VolkerServices will also:

- Behave legally, honourably and ethically at all times
- Remain opposed to bribery and the receipt of goods within the context of all aspects of its business
- Trade and compete fairly, within a framework of applicable competition law
- Source a series of company-wide term deal orders to attempt sourcing of goods where possible and practical from local sources
- Attempt to ensure free and open trade within the guidelines of the specification and its ethical conduct. The client generally specifies goods and services, however where value engineering can be undertaken it is encouraged
- Procure fairly traded goods in line with the requirements of its clients and its own procurement guidelines however, we do not typically procure from outside the UK

Additional detail is available in:

- *VolkerWessels UK Anti-Corruption Policy*
- *VolkerWessels UK Fraud Policy*
- *VolkerWessels UK Integrity Policy*
- *VolkerWessels UK Whistleblowing Policy*
- Modern Slavery Act Compliance Statement (available on our websites)

1.10 MANAGEMENT OF SUBCONTRACTORS

As part of the process of selecting subcontractors their HSEQS performance will be reviewed to confirm acceptable systems are in place. Audits, accident and performance records and the taking of references will be implemented as appropriate in accordance with company procedures to ensure competent contractors are employed and sufficiently resourced.

2.0 HEALTH & SAFETY

2.1 RISK ASSESSMENT AND HEALTH & SAFETY PLANNING

VolkerServices identifies risk as any uncertainty on our ability to achieve our objectives. We recognise that all of our activities involve risk and in order to effectively minimise the negative effects of risk, it must first be properly managed.

VolkerServices manages risk by using coordinated activities aimed at identifying it, assessing its potential impact on our operations and implementing controls appropriate to the levels of perceived risk where deemed necessary. The principles of prevention to be applied while assessing risk are as follows:

1. Avoiding risks
2. Evaluating the risks which cannot be avoided
3. Combating the risks at source
4. Adapting the work to the individual, especially with regards to the design of workplaces, the choice of work equipment and the choice of working methods, with a view, in particular, to alleviating monotonous work and work at a predetermined work-rate, and to reducing their effect on health
5. Adapting to technological progress
6. Replacing the dangerous by the non-dangerous or the less dangerous
7. Developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment
8. Giving collective protective measures priority over individual protective measures, and
9. Giving appropriate instructions to employees

Key business activities requiring suitable and sufficient assessment include but are not limited to:

- Manual Handling
- Personal Protective Equipment
- Display Screen Equipment
- Noise at Work
- COSHH
- Work at Height
- Fire

Risk assessment is the responsibility of the relevant departmental manager with the assistance of the CR Director. Assessments are completed by competent individuals and based on the best information available, such as experience, observation, forecasts, industry best practice, technical guidance and approved codes of practice.

All risk assessments shall be reviewed by the relevant manager if there is a reason to suspect it is no longer valid or there has been a significant change in the matters to which it relates. Office risk assessments shall be carried out and reviewed as necessary.

VolkerServices also seeks to maximise the positive effects of opportunity; advantageous circumstances which offer the company a chance to progress or grow. It does this in much the same way, by identifying, assessing and implementing measures to capitalise upon opportunities as they present themselves.

Risk and opportunities management are not stand-alone activities; VolkerServices continually improves its approach to these management activities and where possible integrates relevant processes within the wider IMS.

2.0 HEALTH & SAFETY (CONTINUED)

2.2 SITE HEALTH & SAFETY RULES

VolkerServices is committed to providing a safe and suitable working environment. We take care to ensure that we provide appropriate resources, such as buildings, equipment, transport and supporting services, and that they are maintained in a condition that enables our employees to work safely and to meet company objectives. This section defines the standards and rules, which compliment company procedures, the Construction Industry Publications (CIP) Health & Safety Manual (“the green book”) and Environmental Manual (“the green book”).

Throughout the course of employment, VolkerServices’ personnel may be required to visit construction sites under the control of the wider VW UK group. When doing so, VolkerServices’ personnel must follow the relevant business unit’s site rules but in any case, as a minimum the rules states below:

- All persons having any business on site must attend an induction and receive and understand a copy of the site rules
- All persons must report to the site office and sign in before entering the site, and sign out on leaving the site
- All persons on site must wear the mandated PPE at all times (the site offices and welfare facilities are excluded from this rule)
- Trainers will not be permitted at any time. Visitors shall be made aware regarding protective footwear, but may be exempt if agreed and accompanied by site management
- No one is to operate vehicles, plant or machinery. This is a zero tolerance issue which may result in persons being removed from site
- Failure to wear a suitable harness and lanyard connected to a safe attachment point is a zero tolerance issue where and when appropriate
- The use of hand held mobile phones while operating vehicles whilst on site is prohibited, except if parked up and the engine switched off
- No person under the influence of drugs or alcohol will be permitted to remain on site
- Welfare facilities are to be kept clean and tidy at all times
- Smoking, drinking or eating is only permitted in designated areas
- Warning signs must be obeyed at all times
- All hazards, near misses, close calls, accidents and dangerous occurrences must be reported to the site office, and all injuries entered in the accident book
- It is incumbent upon all staff to operate in a safe manner and not to endanger themselves or other persons by their actions
- All pedestrian and vehicle control signs must be complied with
- No persons are permitted to be underneath any unprotected overhead activities
- Horseplay will not be tolerated
- VolkerServices’ personnel must not carry out any construction works, operate any plant or equipment or handle any hazardous substances without prior authorisation. In the unlikely event that such activities are authorised, personnel must consult the individual business unit’s *Health and Safety Policy and Practice*

It is the responsibility of all employees to observe these rules, to behave in a safe and reasonable manner, and to adhere to all instructions given by appointed management with regard to the respective location. Failure to comply with the following rules will render employees liable to disciplinary action. It should also be borne in mind that a breach of health & safety legislation is a criminal offence and action taken by an enforcing officer may result in heavy penalties i.e. fines and / or imprisonment. Safety is the responsibility of everyone: directors, managers, site and office staff, fellow employees and yourself. All persons have a responsibility to contribute towards making their place of employment a safe place to work. Safety measures are introduced to control risks to everyone at the location, including employees, subcontractors, visitors, members of the public and anyone else who could be harmed.

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2.0 HEALTH & SAFETY (CONTINUED)

2.3 HEALTH

Elements of the VW UK Occupational Health system include:

- **Pre-employment health questionnaire** to ensure employees are fit and capable for effective performance at work without risk to health
- **Management of work activities to eliminate / reduce risks to health**, including planning, organisation and risk assessment
- **Health surveillance** to evaluate whether there are any adverse effects the work or working environment are having on the individual and to act upon the earliest signs of possible harm
- **Assessment of fatigue** - The risk of accidents from cumulative fatigue is well recognised, and
- **Consideration of new and expectant mothers** - See *VolkerWessels UK Employee Handbook*. The Human Resources Department will notify the Company Occupational Health Nurse. A risk assessment will be carried out on the individual employee concerned

Additional information is available via our *VolkerWessels UK Occupational Health and Wellbeing Policy and Strategy*.

2.4 DRUGS AND ALCOHOL POLICY

The *VolkerWessels UK Drugs and Alcohol Policy* is designed to ensure safety by placing and enforcing strict limits regarding the misuse of drugs or alcohol. We ask all VolkerServices' employees and those working on our behalf, to lead by example, challenge unsafe attitudes and behaviours to establish a workplace free of injury or incident. All employees, those working on our behalf, and visitors to sites or offices must be aware of the requirements of the *VolkerWessels UK Drugs and Alcohol Policy*, and the implications of failing to comply, as part of the site or office induction process.

The policy is available to all employees on Workspace and copies can be provided on request.

To ensure compliance with this policy you may be required to undergo testing in the following circumstances:

- **Pre-employment new employee screening** - All new employees must undergo screening for drugs and alcohol as soon as practicable after their start date
- **Random** - Unannounced random drugs and alcohol screenings could take place at any time whilst at work or on duty of any employee, subcontractor, self-employed or agency worker. A minimum percentage of personnel will be subject to unannounced random alcohol and drug screening each year
- **For Cause** - Screening to find out whether drugs or alcohol were a factor in an accident or incident, where the person(s) actions or omissions are suspected of contributing to the accident or incident, where the behaviour of the person gives cause to suspect that person is unfit to continue work or if drugs or paraphernalia are discovered on a VW UK managed facility
- **Transfer or promotion** - Any employee who is transferred or promoted to a safety critical post will be screened for drugs and alcohol, even if the employee already holds a safety critical post

All testing is undertaken to ensure that employees' safeguards, confidentiality and dignity are maintained to a high standard at all times.

2.0 HEALTH & SAFETY (CONTINUED)

2.5 OFFICE / WORK PLACE SAFETY

The following requirements apply to offices in which VolkerServices operates:

- Electrical installations shall only be installed by a competent person and tested at regular intervals in accordance with the Electricity at Work Regulations 1989
- Offices shall be kept at a reasonable temperature, be well ventilated and lit
- Passages and stairs shall be kept clear of obstructions and be well lit
- Flooring shall be kept in a safe condition. Damaged carpeting, liquid spillages etc. shall be reported to management
- Filing cabinets shall be loaded from the bottom drawers first and only one drawer opened at a time. Storage racking shall be of adequate strength, properly loaded, stable, and securely fixed where possible
- Great care shall be taken in the storage and use of chemicals and liquids. They shall be stored and used in accordance with the manufacturers' instructions / COSHH assessment
- Portable equipment shall operate at 110V or lower. Where this is not possible RCD protection shall be used
- Electrical equipment shall be visually inspected and checked for defects at regular intervals and, if a fault is suspected, taken out of use and checked by a qualified electrician. Trailing electric cables shall be avoided
- An appropriate maintenance system (e.g. HSE guidance) shall be established for all electrical equipment and records of inspection and testing maintained as necessary
- Employees who are considered to be display screen equipment users (through DSE assessment) shall be entitled to free eyesight tests and the provision of corrective eyewear if prescribed
- DSE users will be provided with suitable equipment to establish an ergonomic workstation
- Suitable instruction on its adjustment will be provided
- Adequate welfare facilities shall be provided
- All dangerous parts of machinery shall be adequately guarded
- All employees shall make proper use of all safety equipment and facilities provided to control working conditions / environment
- Work areas shall be kept clear and in a clean and tidy condition
- Toilet and welfare facilities provided shall be kept clean and tidy

Any person found contravening these requirements shall be subject to disciplinary action.

2.6 NOTICES AND WRITTEN INSTRUCTIONS

All hazard / warning signs and notices displayed on the premises shall be complied with.

2.7 EMERGENCY PROCEDURES

Procedures to deal with potential, serious and imminent danger and danger areas e.g. first aid, fire and means of escape in an emergency, shall be detailed at each office location. A competent person shall be nominated to implement these procedures.

2.8 FIRST AID

The company affirms its responsibilities under the Health & Safety (First-Aid) Regulations 1981 to provide or ensure that adequate equipment, facilities and trained persons are provided to render first aid.

At least one qualified first aider shall be provided at each work location dependent on the risk of injury or ill health. An appointed person shall be identified at each location who may also be a first aider. It shall be the first aiders / appointed person's responsibility to ensure that appropriate first aid equipment / facilities are maintained.

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2.0 HEALTH & SAFETY (CONTINUED)

2.9 FIRE PRECAUTIONS

A fire safety risk assessment shall be carried out for all locations in accordance with The Regulatory Reform (Fire Safety) Order 2005 to identify necessary arrangements and control measures.

A fire plan shall be produced and displayed for permanent offices to include location of firefighting equipment, fire or smoke detectors, emergency lighting, fire call points and fire exits. Training, appointment of marshals, and evacuation procedures shall be established.

Adequate fire notices and signs shall be prominently displayed, as identified by the fire safety risk assessment.

All emergency procedures shall be adhered to. These procedures will vary from location to location and training will be given.

All fire escape routes, firefighting equipment and fire doors shall be kept free from obstruction and routinely monitored. Fire doors must be kept closed at all times when not in use.

Any used or missing firefighting equipment shall be reported to management, who will ensure that it is replaced as soon as possible.

2.10 MANUAL HANDLING

Lifting and moving loads by hand are one of the most common causes of injury at work; one poor lift can cause permanent and often painful damage. VolkerServices' personnel should:

- Eliminate, where practicable, the need for manual handling
- Carry out a manual handling assessment to address task, load, work environment and the individual's capability, and
- Use mechanical handling aids to reduce physical strain

2.11 HAZARDOUS SUBSTANCES

When selecting substances or materials for use, preference must be given to the substance or material that produces the least risk to personnel and the environment. Where potentially hazardous substances are provided by the company for use by VolkerServices' personnel, each substance must be accompanied by a suitable and sufficient assessment carried out in accordance with the requirements of the Control of Substances Hazardous to Health (COSHH) Regulations 2002. COSHH assessments are carried out by competent members of the CR department and must be requested by any VolkerServices' employee that intends to use a potentially hazardous substance. These assessments will outline the mandatory controls which must be in place when using, or in proximity to, such substances. See H48 *Control of Substances Hazardous to Health* for guidance.

2.12 PERSONAL PROTECTIVE EQUIPMENT (PPE)

The company recognises its responsibility under the Personal Protective Equipment Regulations to assess the risks, to provide and train personnel in the use of suitable PPE, and to maintain and replace this as necessary. Therefore:

- Protective equipment shall be used, stored and maintained in accordance with manufacturers' instructions and training provided where necessary
- Any damage, loss, fault or unsuitability of protective equipment shall be reported to management, and
- VolkerServices will issue suitable protective equipment to directly employed staff and operatives, and undertake to replace such equipment whenever necessary

2.0 HEALTH & SAFETY (CONTINUED)

2.13 DELIVERIES

Drivers delivering goods and materials must report to a competent member of staff at each location to receive instructions on when, where and how to unload their vehicle. They must remain with their vehicles, except to visit welfare facilities or offices to deal with paperwork. When outside of the vehicle the driver must wear any required PPE for the site, if required.

Vehicles must not be overloaded. Loads must be evenly distributed, secured and must not project beyond the side or back of the vehicle. The design and construction of the vehicle must be suitable for the load(s). Drivers or operators are responsible for checking the security of their loads. Where necessary, abnormal loads must be formally notified and a warning vehicle should be in attendance. When vehicles are being loaded, the driver should only remain in the cab if it can protect him from the risks of falling materials / objects and other relevant hazards. Personnel working at height while loading and unloading deliveries must follow the industry guidance on preventing falls from vehicles. Personnel should:

- Load and unload vehicles from ground level where possible
- Use all available mechanical lifting aids where trained to do so, and
- Only work at height as a last resort, using all available fall prevention equipment available

2.14 ACCIDENT AND INCIDENT REPORTING

Medical treatment should be sought for injuries sustained at work, no matter how slight and an appropriate record must be made in the accident book.

All accidents and incidents, diseases, dangerous occurrences and damage to property belonging to VW UK or others, shall be reported to your line manager. Line managers should escalate this as necessary. As soon as it is practicable, causes of such occurrences should be thoroughly investigated to prevent a recurrence. VolkerServices personnel can refer to HSE-31 *Accident & Incident Report* for guidance.

All injuries, diseases or dangerous occurrences suspected of being covered by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 must be notified to the CR Director as soon as practicable.

A formal investigation will be held for all RIDDOR reportable injuries, serious injuries, fatalities, reportable diseases, reportable dangerous occurrences, significant near misses and any other event warranting formal investigation due to its scale, nature or impact.

The CR Director in certain situations may request a formal investigation to be carried out for some accidents and incidents that would ordinarily be treated as local investigation to draw important lessons from a formal investigation. Formal investigations will be completed by the CR Director or other competent person and documented using H07-02 *Accident Incident Near Miss HSEQ Investigation Report*.

Records of accidents, personnel numbers, and total hours worked by VolkerServices are used in HSEQS performance measurement.

All personnel are encouraged to report hazards, near misses and close calls relating to our activities using HSE-54-VW *Hazard Observation - Close Call - Near Miss Report*. Line managers will ensure these are reviewed, closed out, trends monitored for action and feedback is given to those raising them.

2.15 WORK EQUIPMENT

VolkerServices requires that all work equipment complies with the requirements of the Health and Safety at Work etc. Act 1974, the Provision and Use of Work Equipment Regulations (PUWER) 1998 and the Electricity at Work Regulations 1989 as applicable.

All work equipment must be suitable for the purpose for which it is intended. To be able to work as safely as possible it is essential that work equipment is maintained and inspected by a competent person, in accordance with legal requirements and manufacturers' recommendations.

Any fault, damage, defect or malfunction of any equipment shall be reported to management for action, which may include taking the item out of use.

Repair, maintenance or cleaning of equipment shall only be carried out by an authorised, competent person, in accordance with manufacturers' recommendations and preceded by a risk assessment where appropriate.

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2.0 HEALTH & SAFETY (CONTINUED)

2.16 VEHICLES

Regular checks of vehicles, in conjunction with company procedures and manufacturers' recommendations, shall be carried out prior to use.

Driving or operating any vehicle is not permitted without the appropriate driving licence, competency and authorisation. Unauthorised passengers or unauthorised loads shall not be carried. Vehicles shall not be used for unauthorised purposes. Vehicles shall not be loaded beyond the stated capacity.

Driving or operating vehicles whilst suffering from a medical condition or illness that may affect ability is not permitted. Driving or operating vehicles whilst under the influence of alcohol or any other drug, which may affect operating ability, is not permitted.

All available safety features such as seat belts shall be utilised.

Use of mobile phones in vehicles whilst driving is restricted to hands free use only however still avoid making or taking phone calls when driving wherever possible. Hands free calls should make use of a vehicles Bluetooth interface and at no time shall a handheld device be touched while driving, even to answer a hands free call. Bluetooth connections should be established before beginning a journey.

Vehicles must be immobilised and the ignition key removed whilst unattended, keys must be kept in a secure place when not in use.

All personnel driving at work will be required to comply with the *VolkerWessels UK Driving for Work Policy and Handbook*.

2.17 NO-SMOKING POLICY

The Health Act 2006 states "all employees have a right to work in a smoke free environment" and that "premises must be smoke free if they are used as a place of work".

Therefore smoking is not permitted in any part of any building, including corridors, lifts, stairways, lavatories, reception areas or entrances and ALL company owned or hired vehicles (excluding ECOP vehicles owned or hired by the driver). Smoking is also prohibited within 5m of any doorway or fire escape.

Smoking is only permitted in a designated "Smoking Area". VW UK determines that Electronic cigarettes (e-cigarettes), products that can be used for the consumption of nicotine-containing vapour via a mouth piece (vaping), should be treated in the same manner as cigarettes.

This policy applies to all employees, contractors, customers and visitors and all staff are obliged to support the implementation of this policy. Appropriate "No Smoking" signs will be clearly displayed at all entrances and exits, within the premises, and in company vehicles.

Those who do not comply with the smoking law are liable to a fixed penalty fine and possible criminal prosecution.

If you would like further advice or assistance on quitting smoking please contact Occupational Health on 01992 305045 or the NHS by calling 0300 123 1044 (<http://smokefree.nhs.uk/>).

2.0 HEALTH & SAFETY (CONTINUED)

2.18 YOUNG PERSONS

Where it is intended to employ young persons, those being under 18 years of age, a specific risk assessment for the type of work they will be involved in shall be carried out in accordance with the Management of Health and Safety at Work Regulations 1999.

Special consideration must be made when a person under the age of 21 years is to operate certain vehicles on a public highway, i.e. only if a valid driving licence is held.

2.19 CONSULTATION WITH EMPLOYEES

VolkerServices is committed to consulting with its employees on health and safety matters in accordance with the Health and Safety (Consultation with Employees) Regulations 1996 (as amended).

Consultation involves listening to our employees' views and taking account of what they say before any decision is taken.

Employees will be consulted on matters that affect their health and safety and, in particular, with regard to:

- The introduction of any measures or new technologies
- Arrangements for appointing competent persons
- Relevant health and safety information, and
- Planning and organisation of any health and safety training

This will be either directly or through elected representatives.

Employees or representatives may make representations to management on potential hazards and dangerous occurrences at the workplace, which affect, or could affect, themselves or others.

Consultation may be carried out during:

- Inductions, and
- Pre-arranged or ad-hoc meetings following any responses to any circulated information

2.20 GROSS MISCONDUCT

An employee will be liable to summary dismissal if he / she is found to have acted in any of the following unsafe ways:

- A serious or wilful breach of the safety rules specific to each location
- Failure of a drugs and alcohol test
- Unauthorised removal or interference with any guard or protective device
- Unauthorised operation of any item of machinery, plant or equipment
- Unauthorised removal of any item of first aid equipment
- Wilful damage to, misuse of, or interference with any item provided in the interest of health, safety or welfare at work
- Unauthorised removal or defacing of any label, sign or warning device
- Misuse of chemicals, flammable or hazardous substances, or toxic materials
- Smoking in any designated 'No Smoking' area
- Smoking whilst handling flammable substances
- Horseplay or practical jokes which could cause accidents
- Making false statements or in any way deliberately interfering with evidence following an accident or dangerous occurrence
- Misuse of work equipment
- Dangerously overloading any item of lifting equipment, and
- Overloading or misuse of any vehicles

3.0 ENVIRONMENT & SUSTAINABILITY

3.1 PRIME CONCERNS

Each day we deal with a number of environmental issues that relate specifically to our industry. The key areas of concern are:

Sustainability - Balancing the seemingly conflicting needs of social, economic and environmental aspects of our operations. Environmental sustainability is concerned with protecting, conserving and enhancing both biodiversity and the environment, by reducing waste, preventing pollution and by using water and other natural resources as efficiently as possible.

Energy Consumption - The environmental impacts of energy use are numerous from initial extraction, production and transport through to conversion, consumption and disposal of waste products. Inefficient energy use or wastage at temporary and fixed locations, including use by equipment, is a concern throughout our activities. Energy consumption shall be monitored with a view to seeking opportunities for reduction wherever practical. Wherever possible we will select fixed offices, and seek to establish site offices, with energy saving measures / technology.

Company owned and operated vehicles shall generally be diesel powered, which is considered to be more energy efficient than equivalent petrol driven vehicles, resulting in less fuel consumed by our fleet generally. Vehicles operated by the company shall also be serviced in accordance with the manufacturer's details to maintain efficiency and minimise pollution.

Carbon Footprint - Our carbon footprint is measured and reported on an annual basis. Relevant reports will be issued in accordance with recognised emission reporting protocols, and where necessary be validated by a third party. Where possible, and when requested, the company will disclose our carbon footprint data in accordance with standard Carbon Disclosure protocols. Progress towards reducing our carbon footprint will be communicated to all employees, and any feedback from the business will be used to further improve our footprint year on year.

Pollution (Air, Water, Noise, Visual) - Particularly where it may affect the quality of life for people living and working in the vicinity. We will take every reasonable precaution to avoid pollution of the environment. Control measures shall be put in place where necessary.

Water Consumption - Water consumption shall be monitored with a view to seeking opportunities for reduction wherever practical. Appropriate water saving measures and devices will be made available where practical to do so.

Waste Management - In recognition of the fact that the earth's resources are finite, every step possible will be taken to minimise waste through the implementation of the waste hierarchy. VolkerServices will encourage the reuse or recycling of materials, in accordance with industry guidelines and relevant environmental legislation. Transport of waste materials to the appropriate location will only be undertaken by a licensed waste carrier.

Responsible Timber Procurement - The UK government recognises wood certified under the FSC and PEFC schemes as "verified legal and sustainable". In line with these policies, VolkerServices will ensure that all timber, timber products and timber sheet materials purchased on behalf of VW UK is purchased from FSC or PEFC schemes. Those which cannot demonstrate they are from FSC or PEFC schemes must not be used. Timber from illegal and unsustainable sources must not be used.

3.2 IMPACT ASSESSMENT

VolkerServices recognises that its activities may at times have an impact on the environment. Wherever possible we shall identify and endeavour to mitigate any adverse effects which may occur as a result.

3.3 COMMUNITY RELATIONS

VolkerServices will inform the relevant parties of how and when our operations will affect them, through public meetings, notices, and signage or by verbal or written means.

4.0 QUALITY

4.1 QUALITY OBJECTIVES & KPIS

VolkerServices is committed to continually improving performance across all its activities. To ensure that we are achieving the best delivery outcomes possible, we need to measure our performance against our stated objectives. VolkerServices has established a number of Key Performance Indicators (KPIs) that help us to measure our performance. The results of these KPIs help us to identify areas that need attention, and by changing our processes to deal with these areas we continually monitor the appropriateness, and seek to improve the effectiveness of the IMS.

Objectives are established in agreement with 'top management'. These objectives set targets which relate to the KPIs, as well as other requirements according to the current needs of the organisation.

4.2 RISK AND OPPORTUNITIES MANAGEMENT

VolkerServices utilises quality risk management towards the identification, assessment, and prioritisation of risk and the effects of uncertainty, whether positive or negative, on our performance. Combined with the efficient application of resources, we aim to minimise, monitor, and control the probability and / or impact of any unplanned disruptive events whilst maximising the realisation of positive opportunities.

4.3 RESOURCE MANAGEMENT

We use a number of external resources to help us with our work, including advisors, suppliers and consultants. When selecting external resources, we use Workspace to store any necessary information regarding such organisations.

Engagement with the supply chain should align with the wider business and group procurement strategies, comply with relevant business and group processes and policies, helps the business to achieve its objectives and above all be conducted ethically and in alignment with the company values.

4.4 CONTROL OF DOCUMENTED INFORMATION

This section describes the procedures we have put in place to ensure that we use the right information correctly to manage business activities efficiently and effectively.

ISO 9000 defines a 'document' as information and the medium on which it is contained, for example a record, specification, procedure document, drawing, report, or standard. The medium can be paper, magnetic, electronic or optical computer disc, photograph or master sample, or combination thereof. A set of documents, for example, specifications and records, is frequently called "documentation". Some requirements (e.g. the requirement to be readable) relate to all types of documents. However, there can be different requirements for specifications (e.g. the requirement to be revision controlled) and for records (e.g. the requirement to be retrievable).

ISO 9000 also defines 'documented information' as information required to be controlled and maintained by an organisation and the medium on which it is contained. Documented information can be in any format or media and from any source. Documented information can refer to:

- The management system itself, including related processes
- Information created in order for the organisation to operate (documentation), or
- Evidence of results achieved (records)

Q01 *Control of Documented Information - Overview* describes the business' approach towards control. Q01-01 *Control of the Integrated Management System* defines how we establish, create, format, reference, control, and make available the IMS documentation. It also defines how we control the IMS screens and other storage areas within Workspace including the document library and the project folder structure.

Q01-03 *Control of Records and Workspace in Offices and Departments* defines the controls for retaining documented information, including (but not limited to) VolkerServices' departments and regional offices. It includes guidance on document storage and access to records through Workspace.

Q01-04 *Control of Archiving* defines the controls for archiving office records.

4.0 QUALITY (CONTINUED)

4.5 CONTROL OF NON-CONFORMANCE

BS EN ISO 9000:2015 defines 'non-conformity' as 'non-fulfilment of a requirement', where 'requirement' is a 'need or expectation that is stated, generally implied or obligatory'.

Non-conformance potentially arises through any of the following:

- At internal audit, a failure to comply with VW UK systems and requirements
- Complaint from a customer / client in respect of the product / service provided by VW UK
- Third party complaint

When such instances are identified, they are dealt with in accordance with Q04 *Non Conformance and Corrective Action*.

4.6 CORRECTIVE ACTION

Corrective action is the action taken to eliminate the cause of an identified non-conformity. It is the action taken to deal with the root-cause of the situation.

Procedure Q04 *Non Conformance and Corrective Action*, defines how non-conformances, including complaints from the client, are reviewed in order to determine the required action. The review will also include:

- Identifying if the IMS documentation needs to be reviewed; and if corrective action is required, the CR Director / Senior IMS Manager is informed and will help agree how the revision is to be applied
- Any changes made are communicated to all employees and the new arrangements monitored for effectiveness

4.7 COMMUNICATION

VolkerServices is committed to involving all of its employees in the management of HSEQS. We will ensure that our objectives are communicated to employees in a range of ways, including individual meetings, team briefings, memos, notice boards, and other means, and we welcome and act upon employee feedback in order to maintain continual improvement.

4.8 MEASUREMENT, ANALYSIS AND IMPROVEMENT

VolkerServices uses a number of measurement techniques to help analyse and improve our performance. The results that we collect from KPIs, non-conformances, audits, client satisfaction surveys, feedback on our supply chain, etc. are analysed to discover how effectively we are performing and where there are weaknesses in our IMS. In this way we can identify areas for improvement. By looking at how we do things and the results we achieve, we are able to revise our systems where required.

4.9 AUDIT AND SURVEILLANCE

An audit is most easily described as a formal assessment of the application of agreed processes and ultimately procedure(s). An audit is not activity based (that is a surveillance), it is process based. The company internal auditors will perform periodic checks on the application of our IMS in accordance with Q03 *Audit* to determine effectiveness and company-wide conformance to the system. From time to time we are also audited by external bodies (third parties), such as clients, trade organisations and the BSI. These audits will demonstrate conformance to our IMS, current performance, our ability to meet their requirements and where appropriate conformance to standards such as ISO 9001.

4.0 QUALITY (CONTINUED)

4.10 MANAGEMENT REVIEW

At least once a year, we conduct a management review of the IMS, as detailed within Q07 *Management Review*. Minutes of the review are issued to appropriate parties, and any changes that are required as a result of the review are incorporated into the management system. Changes within the IMS are communicated through the 'Record of Revisions', emailed to all employees on a monthly basis.

The review includes consideration of external and internal issues that are relevant to business purpose and strategic direction. Further, identification and review of issues that could affect the business's ability to achieve the intended results of the IMS.

The continued appropriateness of the IMS is reviewed regularly against the size and scope of the business, its markets, legislative change, and client and stakeholder requirements. Any intended changes, modifications, extension of scope are agreed with senior management and the VW UK Corporate Governance and IMS teams.

All external resources must adhere to the requirements of our IMS, unless operating under their own IMS which, where necessary, should be registered to BS ISO 45001, BS EN ISO 14001 or BS EN ISO 9001 respectively by a UKAS certified registration body.

4.11 CONTINUAL IMPROVEMENT

Continual improvement of our IMS is achieved by using the data we collect, as described above, as well as through employee feedback and management reviews, to revise and improve our systems and processes.

5.0 IMS AUTHORISATION

Document owner approval:

Adrian Shah-Cundy, CR Director - 13.08.2019

Approval for IMS:

Andria Georgiou, IMS Coordinator - 13.08.2019