Health & Safety Policy

(including:
H&S Statement;
H&S Organisation and Responsibilities;
H&S Arrangement Policy; and
Occupational H&S Policy)

THE CLARUS NETWORKS GROUP

CLARUS NETWORKS LTD

Versioning History

DOCUMENT CLASSIFICATION	Protected
DOCUMENT REF	IMS-DOC-05-1c
VERSION	9
DATED	27 July 2026
DOCUMENT AUTHOR	Emma Gartland, Compliance Manager
DOCUMENT OWNER	Derek Phillips, Managing Director

Revision history

VERSION	DATE	REVISION AUTHOR	SUMMARY OF CHANGES	DISTRIBUTION
1	01/07/2018	Jacqui Dalgleish	First publication	All staff, subcontractors and customers on request
2	17/12/20	Jacqui Dalgleish	Review	All staff, subcontractors and customers on request
3	07/01/22	Jacqui Dalgleish	Review and expansion to include responsibilities	All staff, subcontractors and customers on request
4	23/03/23	Kathryn Andrews	Reformatted to include headings/sub-headings, additions to/clarifications of risks and responsibilities following move to new offices with warehousing	All staff, subcontractors and customers on request
5	05/10/23	Kathryn Andrews	Amended for change in staff roles	All staff, subcontractors and customers on request
6	16/07/2024	Kathryn Andrews	Amended for change in staff roles	All staff, subcontractors and customers on request
7	21/07/2025	Kathryn Andrews	Amended for change in staff roles	All staff, subcontractors and customers on request
8	21/08/2025	Kathryn Andrews	Clarification of how CDM Regs met	All staff, subcontractors and customers on request
9	27/07/2026	Emma Gartland	Annual review and updated staff roles	All staff, subcontractors and customers on request

Approval

NAME	POSITION	SIGNATURE	DATE
Derek Phillips	Managing Director		01/07/2018
Derek Phillips	Managing Director		17/12/20
Derek Phillips	Managing Director		07/01/22
Derek Phillips	Managing Director		23/03/23
Derek Phillips	Managing Director		17/10/23
Derek Phillips	Managing Director		18/07/24
Derek Phillips	Managing Director		23/07/25
Derek Phillips	Managing Director		22/08/25
Derek Phillips	Managing Director		29/07/2026

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1. Introduction

The Clarus Networks Group (Clarus) is a provider of specialist connectivity solutions. The Group operates within the UK, EU, USA, and Brazil and exports globally.

This policy forms part of Integrated Management System for Clarus Networks Limited.

This policy applies to employees, workers and contractors.

2. The Statement of the Health and Safety Policy (Statement of Intent)

Clarus aims to ensure, so far as is reasonably practicable, the health, safety and welfare of our employees while they are at work and of others who may be affected by our undertakings. This general policy statement provides a commitment and intent to comply with the Health and Safety at Work etc. Act 1974.

To ensure the principles of health and safety are clearly understood throughout the organisation we will be committed to:

- complying with relevant health and safety laws and regulations, voluntary programmes, collective agreements on health and safety and other requirements to which the organisation subscribes;
- setting and monitoring of health and safety objectives for the organisation;
- effective communication of and consultation on health and safety matters throughout the organisation;
- assessing the risks to the safety, health and wellbeing of our employees and other who may be affected by our activities and implementing controls to minimise those risks;
- ensure the health and wellbeing of our employees;
- preventing work-related injuries, ill health, disease and incidents;
- providing and maintaining safe plant and equipment and implementing safe systems of work;
- the safe use, handling, storage and transport of articles and substances;
- providing and maintaining a safe working environment with safe access, egress and welfare facilities;
- providing the necessary training to our employees and others, including temporary employees to ensure their competence with respect to health and safety;
- providing suitable and sufficient information, instruction and supervision for employees;
- continually improving the performance of our health and safety management;
- devoting the necessary resources in the form of finance, equipment, personnel and time to ensure the health and safety of our employees and seeking expert help where the necessary skills are not available within the organisation;
- an annual review and when necessary the revision of this health and safety policy;
- making this policy available to relevant interested external parties, as appropriate.



Derek Phillips
Managing Director

29 July 2026

3. Health and Safety Policy Organisation and Responsibilities

3.1. Organisational Scope to Support the Policy

The Clarus Networks Group have provided a scope to support the policy and we will endeavour to:

- Provide adequate control of health and safety risks arising from our work activities.
- Consult with and engage our employees and contractors on matters affecting their health and safety.
- Ensure that safe plant and equipment is suitably maintained.
- Ensure that all employed people can handle and use substances safely.
- Provide information, instruction and supervision for employees and contractors as appropriate.
- Maintain a H&S Management System (saved internally within the Policies library).
- Ensure that all employees and contractors are competent to do the work, and provide adequate training as needed for the situation.
- Prevent accidents and cases of work related ill health.
- Maintain safe and healthy working conditions with the provision of suitable welfare facilities.
- Review and revise this policy as necessary or at regular intervals whichever comes first.

3.2. Overall responsibility

The overall responsibility for health and safety in the organisation belongs to:

Name	Derek Phillips
Position	Managing Director

It is the responsibility of the above person to ensure that sufficient resources are available to ensure that the arrangements within this health and safety policy are implemented, monitored and are operating effectively.

Health and safety management in The Clarus Networks Group will be the responsibility of Derek Phillips, Managing Director, who will:

- Develop a clear overall policy.
- Allocate responsibilities for managing safety at the appropriate levels.
- Develop and implement a health and safety plan for individual projects where appropriate.
- Check the implementation and effectiveness of each plan through a monitor and review system.
- Ensure all hazards are identified and risk assessments carried out to help design systems of work that minimise and/or control risk where appropriate.
- Provide supervision for all persons where there is a shortfall in experience or competence, young people and trainees.
- Review, monitor and audit the whole process continually, as necessary or sooner when the activity or conditions change that effect the risk with an aim to making continuous improvement.

3.3. Named Responsibilities

The following persons have been named as having responsibilities to assist in the delivery of this health and safety policy:

Name	Warren dos Reis Marques
Position	Operations Director

Area of responsibility	General inspections of the office for slip and trip hazards. Ensuring risk assessments are undertaken as appropriate.

Name	Josh Fleming
Position	TSI Manager
Area of responsibility	Performing risk assessments.

Name	John Gillogley
Position	Warehouse Manager
Area of responsibility	Inspecting the warehouse and yard for slip and trip hazards, ensuring all stock is safely stored, forklift truck safety and maintenance, Fire Marshall.

Name	Kathryn Andrews
Position	Compliance Director
Area of responsibility	Training and associated documentation

It is the responsibility of the above people to ensure that their named duties are carried out diligently in support of this health and safety policy.

3.4. Training

Induction training will be provided for all new starters; further training will be provided, that relate to competence and activities and will include site specific inductions on project sites. Training may be delivered in any of the following formats:

- Toolbox talks
- Individually from a manager, an expert from outside the organisation, a client, managing director or another representative who will be considered suitable.
- Instructor led training on a pre-booked session covering a specific need.
- E-Learning

The training process is the responsibility of Kathryn Andrews, Compliance Director, who will be responsible for keeping training records and the prompting of refresher training. The group has identified the following activities as requiring training:

Activity	**Training Description**	**Delivery Mechanism**
Company Inductions	Cover all aspects of the company	In-house
Installations	Healthy & Safety Working at Heights CSCS cards IPAF card	Outsourced to specialist provider
Warehouse	Forklift training Manual handling	Outsourced to specialist provider

3.5. Information, Communications and Consultation

If at least one person is employed either the health and safety law poster (What You Need to Know) should be displayed or each member of staff should be provided with a copy of the equivalent pocket card.

Health and safety information and support is available from Kathryn Andrews, Compliance Director and RBS Mentor.

Where persons are working at sites owned or controlled by others, information relating to the hazards present, risk assessments, safe systems of work and any emergency procedures will be given to them by their immediate line manager.

3.6. Accidents, First Aid and Emergencies

All accidents and near misses will be reported to Kathryn Andrews, Compliance Director, who will be responsible for the keeping of records and reporting accidents, diseases and dangerous occurrences to the enforcing authorities. When required by a risk assessment, health surveillance will be provided for employees as part of the risk management process. Health surveillance records will be kept by Kathryn Andrews, Compliance Director, who will notify the employees of any issues that they need to be aware of in terms of worker health.

The following action is to be taken in the event of the following emergencies:

Emergency	**Action**
Fire Alarm	Evacuate the building by the stairs and nearest fire exit door and assemble at far end of the stock yard.
Adverse weather considerations	If the UK MET Office issues a 'red' weather warning (danger to life), all staff will be sent home/told not to attend the office/warehouse premises.

First Aid provision has been made by group and the following first aiders may be contacted if first aid is required:

First Aider	Location	Contact Details
Clare Henderson	Livingston Office, Finance Department	0330 1244 805
Scott Macleod	Livingston Office, Projects Department	0330 1244 805
Gary Flowerday	Bathgate office, Tech department, first floor	0330 1244 805
Steven Richards	Bathgate office, NOC department, Ground floor	0330 1244 805
Jonathan Bloomfield	Norwich office	0330 1244 805

3.7. Monitoring and Auditing

Monitoring and auditing will be undertaken as appropriate with an aim to making continuous improvement.

Auditing and monitoring will be the responsibility of Derek Phillips, Managing Director, and will instruct a list of representatives to support the process.

3.8. Plant and Work Equipment

It is the policy of the group to use properly selected and maintained plant and equipment.

It is the responsibility of Warren dos Reis Marques, Operations Director, to oversee the selection of work equipment (whether hired or company owned) and ensure that it is fit for purpose and ensure that it conforms to any required safety standards.

The oversight of the maintenance procedure and programme review is the responsibility of Warren dos Reis Marques, Sales and Operations Director, who will identify all equipment that requires maintenance, arrange for the maintenance and then check that it has been completed. John Gillogley, Warehouse manager, will assist with this as required. It is the responsibility of the site supervisor to check that all tools have been adequately maintained before use onsite, (whether hired or company owned).

If defects are found with any plant or work equipment these should be reported to Warren dos Reis Marques, Sales and Operations Director or John Gillogley, Warehouse Manager, for action. The machinery must be taken out of action and the supplier called to perform the necessary maintenance.

3.9. Hazardous Substances

All hazardous substances will be identified and assessed for risk and checked that they are safe to use prior to purchase. All hazardous substances used that have a significant risk will either be substituted with a less harmful alternative or controlled by designing safe systems of work and communicated to relevant people who are likely to use the product.

Assessments of hazardous substances will be reviewed annually or whenever changes occur that might alter the level of risk.

3.10. Storage and Handling

Storage will be designed so that items are stable in storage and that shelving or racking will be suitable in terms of strength and position to allow safe storage. This will be the responsibility of John Gillogley as appropriate.

Where items require handling, the appropriate means of handling, whether manual or mechanical, will be designed and risk assessed prior to the start of the activity/project. Handling risk assessments and the design of safe systems will be the responsibility of John Gillogley, Warehouse Manager, as appropriate.

3.11. General responsibilities of the Employer

- Make the workplace safe and without risks to health.
- Ensure plant and machinery are safe and that safe systems of work are set and followed.
- Ensure articles and substances are moved, stored and used safely.
- Provide adequate welfare facilities.
- Give information, instruction, training and supervision necessary for health and safety protection.

3.12. Consultation responsibilities of the Employer

- Consult employees or safety representatives on health and safety matters including:
    - Changes in procedures, equipment or ways of working.
    - Arrangements for getting competent people.

- Providing information on likely risks and dangers.
- Measures to reduce or remove the risks.
- The overall health and safety plan.
- The health and safety consequences of introducing new technology.

3.13. The employer must:

- Assess the risks.
- Make arrangements.
- Record the findings.
- Draw up a health and safety policy statement.
- Appoint someone competent.
- Co-operate with other employers.
- Set up emergency procedures.
- Provide adequate first-aid facilities.
- Make sure that the workplace satisfies health, safety and welfare requirements.
- Make sure that work equipment is suitable for use.
- Prevent or adequately control exposure to substances.
- Protect against flammable or explosive hazards, electrical equipment, noise and radiation.
- Avoid hazardous manual handling operations.
- Provide health surveillance where appropriate.
- Provide free, any protective clothing or equipment.
- Ensure that appropriate safety signs are provided.
- Report certain injuries, diseases and dangerous occurrences.

3.14. General responsibilities of Employees

- Take reasonable care for health and safety.
- Co-operate with your employer.
- Correctly using work items.
- Not interfere with or misuse anything provided.
- Report all hazards, defects or concerns.
- Use all facilities for the purpose provided.

4. Health and Safety Organisation and Arrangement Policy

4.1. Introduction

The Group wishes to achieve and demonstrate sound health and safety performance by controlling the risks associated with its organisation and activities, products and services. To achieve this effectively, it shall develop appropriate organisation and arrangements.

The Group shall use this document to guide development of appropriate organisation and arrangements to support effective health and safety practice.

4.2. Management of Organisation and Arrangements

The Group shall manage Organisation and Arrangements by using the following staged approach:

Stage 1	Establish if you have any Organisation and Arrangements issues
Stage 2	Appoint Senior Manager with responsibilities for health & safety
Stage 3	Delegate individuals with responsibilities to implement and monitor health & safety performance
Stage 4	Ensure Competent advice is available to assist
Stage 5	Provide information and training to those
Stage 6	Implement risk assessment findings
Stage 7	Provide adequate supervision
Stage 8	Establish a committee comprising key stakeholders and HS&E practitioners.
Stage 9	Provide resources essential to the implementation, control and improvement of the HS&E
Stage 10	Actively audit arrangements and controls
Stage 11	Monitor
Stage 12	Review

4.2.1. Stage 1 - Organisation and Arrangements

Roles, responsibilities and authorities of employees who manage, perform and verify activities having an affect on the health and safety risks of the Group's activities, facilities and processes, shall be defined, documented and communicated in order to facilitate good health and safety management.

4.2.2. Stage 2 - Senior Accountability

The Group shall define a Senior Manager with accountability for the organisation and arrangements for health and safety. This Senior Manager shall be accountable for the health and safety performance of the Group and shall ensure that appropriate and sufficient resources are made available.

4.2.3. Stage 3 - Delegated Manager and Team

The Senior Manager may delegate responsibility for implementation and monitoring to a defined representative. This representative may form a team to assist in implementation with members of the team named and provided with defined responsibilities.

4.2.4. Stage 4 - Competent Health and Safety Manager

The Group shall appoint a competent Health and Safety Manager to advise the business on health and safety requirements, to ensure implementation of the health and safety strategy and to monitor the health and safety performance of the business.

4.2.5. Stage 5 - Training

The Group shall appoint a person responsible for keeping records of health and safety training and

for prompting refresher training.

4.2.6. Stage 6 - Implementation of Risk Assessment Findings

This Health and Safety Manager may delegate responsibility for specific components of the risk assessment to named employees.

4.2.7. Stage 7 - Supervision

The Group shall allocate employees to act as supervisors for employees who lack experience or competence. A named individual shall have specific responsibilities for young people or trainees.

4.2.8. Stage 8 - Committee

The Group shall form an HS&E Committee comprising key stakeholders and HS&E practitioners.

4.2.9. Stage 9 - General Health and Safety Responsibilities

The Group shall allocate health and safety responsibilities to each level of Manager and employee across the business, as appropriate, with each Manager responsible for implementing the health and safety policy in their area of accountability.

Managers at all levels shall provide resources essential to the implementation, control and improvement of the HS&E management system, including human resources, specialised skills, technology and financial resources.

4.2.10. Stage 10 - Monitoring

The Group shall monitor the performance of employees who are involved in the implementation of this policy.

4.2.11. Stage 11 - Audit

The Group shall audit to ensure that the processes and documents relating to this policy are properly implemented.

4.2.12. Stage 12 - Review

The Group should review this policy as required by the outcome of monitoring, audit and/or changes in legislation or guidance.

5. Occupational Health & Safety Policy brief and purpose

Our Occupational Health and Safety Policy help us preserve the best possible work conditions for our employees. Our company is committed to follow legal standards and create a hazard-free workplace.

5.1. Scope

This Occupational Health and Safety Policy applies to all prospective and current employees of the company as well as volunteers, contractors and consultants.

5.2. Preventative action

Preventative action is any action we take to avoid injuries or illness related to workplace conditions.

We conduct periodical risk assessments and job hazard analysis to discover what is likely to harm employees. We have established preventative measures accordingly.

Potential threats and dangerous situations include but are not limited to:

- Performing tasks on heights, scaffolds, ladders and other unsteady structures;
- Chemical substances (toxic, flammable etc.);
- Operating dangerous equipment;
- Slippery or uneven surfaces;
- Electrical infrastructure;
- Noise/temperature; and
- Quality of air.

We have taken the following preventative measures:

- When employees work in dangerous contexts or locations, we make sure there are safety precautions like scaffolding and safety nets.
- We provide protective gear like gloves, protective uniforms, goggles etc. Using safety equipment is mandatory.
- Inspectors and quality control employees inspect equipment and infrastructure regularly.
- We hold employee training sessions in health & safety standards and procedures.
- All highly dangerous job tasks require at least two employees to be present.
- Employees who do repairs or cleaning have to put up caution signs.
- We have prohibited smoking and vaping indoors.

Also, we enforce a substance abuse policy to protect employees from colleagues' misconduct.

5.3. Emergency Management

Emergency management refers to our plan to deal with sudden catastrophes like fire, flood or explosion. These depend on human error or natural forces.

Our emergency management involves the following provisions:

- Functional smoke alarms and sprinklers that are regularly inspected;
- External maintenance professionals available to repair leakages, damages and blackouts quickly;
- Fire extinguishers and other fire protection equipment that are easily accessible;
- An evacuation plan posted on the walls of each floor;
- Fire escapes and safety exits that are clearly indicated and safe; and
- Fully-stocked first-aid kits at convenient locations.

We also schedule fire drills and emergency evacuations periodically. We monitor performance of health and safety procedures and revise them as required to ensure higher level of protection.

5.4. Additional measures

Our company keeps abreast of changes and tries to promote health & safety actively. We:

- Update our policies according to changes in occupational health and safety legislation.
- Analyse past incidents to discover what went wrong.
- Establish clear procedures for accident reporting.
- Revise work procedures to make them safer.

Our company also consult experts or insurance representatives to ensure it complies with local and international standards.

5.5. Disciplinary Consequences

Every team leader is responsible for implementing this occupational health and safety policy.

Employees must follow health and safety instructions and are held accountable when they do not.

We take disciplinary action that may extend to termination when employees consistently disregard health and safety rules.

It is everyone's responsibility to contribute to a healthy and safe workplace.

6. Responsibilities under the Construction (Design and Management) Regulations 2015 (CDM 2015)

6.1. Introduction

Although not a construction company, the installation of telecommunication equipment falls under the CDM Regs 2015 and Clarus is deemed to be a Contractor. A contractor is anyone who directly employs or engages construction workers or manages construction work.

Clarus ensures that all our employees, and any Bonafide subcontractors/engineers we engage, have the skills, knowledge, experience and, where relevant, the organisational capability to carry out the work safely and without risk to health.

6.2. Our responsibilities under CDM 2015

Clarus always:

- Ensures that all parties are aware of their duties under CDM 2015. This is achieved via thorough planning including meetings involving all interested parties, site inspections and approval of RAMS prior to the commencement of any work;
- plans, manages and monitors all work carried out by our own employees and any subcontractors we engage. Our RAMS always take into account the risks to anyone who might be affected by our installation work (including members of the public) and the measures needed to protect them;
- check that all workers we employ/engage with have the skills, knowledge, training and experience to carry out the work, or are in the process of obtaining them. Clarus provides all necessary training to our employees and supports our subcontractors with any training needs they may have;
- ensures that all workers under our control have a suitable, site-specific induction. This is always discussed with the customer as part of our planning and is provided by the customer's own site manager (customers preference);
- provides appropriate supervision, information and instructions to workers under their control;
- ensures that we do not start work on site unless reasonable steps have been taken to prevent unauthorised access. This is led by the Customer / Principal Contractor; and
- ensure that suitable welfare facilities are provided from the start for workers under their

control, and maintain them throughout the work. This is always discussed as part of planning.

In addition to the above responsibilities, if we are working on a project with multiple contractors we ensure:

- that we coordinate our installation work with the work of others in the project team;
- that we comply with directions given by the principal designer or principal contractor; and
- that we comply with parts of the construction phase plan relevant to our work by means of our RAMS.

6.3. CDM 2015 Exclusions

The requirements relating to "Domestic clients" do not apply to Clarus as we only work with businesses.

7. Approval



Derek Phillips
Managing Director

29 July 2026