

HEALTH AND SAFETY POLICY DOCUMENT

Last Revised: June 2025

Version 1.0

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SCOPE

1 Introduction

This document aims to define the organisation's Health and Safety Management Systems (HSMS) alignment to the Addleshaw Goddard (AG) vision to be a London headquartered, international, full-service law firm delivering consistently high-quality outcomes for our clients globally.

2 Purpose

The purpose of this policy is to specify the roles, responsibilities and arrangements for leading the implementation of HSMS within AG.

The HSMS is dedicated to maintaining healthy working environments that **strives for zero harm** to all individuals affected by our operations.

Our goal is to foster practices that support operational excellence while ensuring compliance with relevant health and safety (H&S) legislation and industry standards.

It is each employee's responsibility to promote H&S standards, which also applies to our business partners, suppliers, temporary workers, contractors, and visitors authorised to be on any of our premises.

3 Legislation and Other Requirements

- Solicitors Regulation Authority (SRA) - Principle 7.
- The Code of Conduct for Solicitors, RELs (Registered European Lawyers), and RFLs (Registered Foreign Lawyers).
- The Health and Safety at Work Act (HSWA) 1974.
- The Management of H&S at Work Regulations 1999.
- The Regulatory Reform (Fire Safety) Order 2005.
- The Construction (Design and Management) Regulations 2015.
- The Terrorism (Protection of Premises) Act 2025.

International requirements, when applicable will be applied and referenced in the market specific H&S Plan.

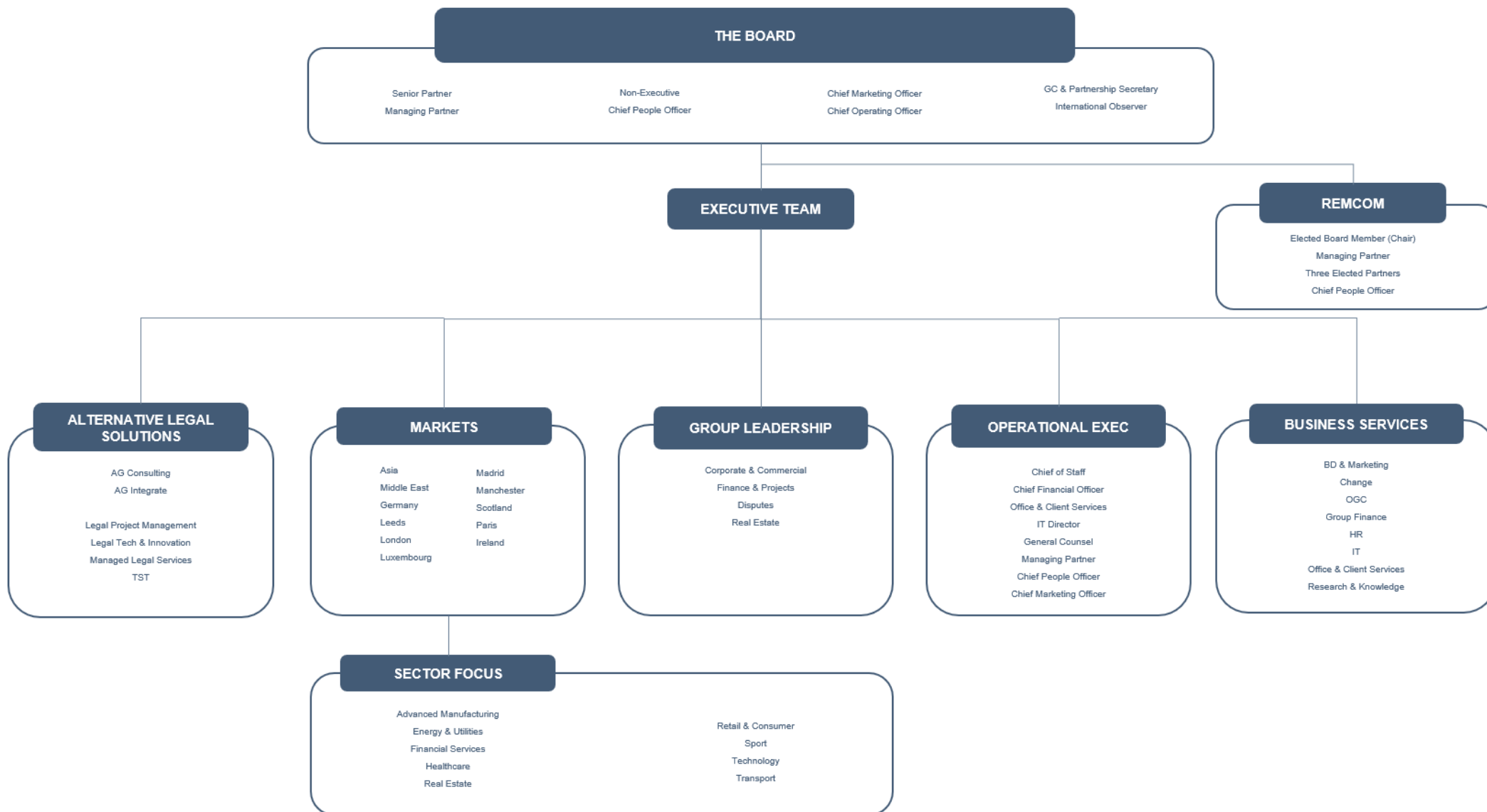
- The AG Employee H&S Handbook.

key personnel are kept informed of relevant, current, and upcoming requirements that may impact operations.

4 Target and Objectives

- 4.1 Zero (0) serious injury/illness and fatality (SIFs) incidents; including SIF Near Misses.
- 4.2 Recognize H&S management as a core component of operational responsibilities.
- 4.3 Effectively communicate commitments: Statement of Intent, establish best practices, and compliance with HSMS.
- 4.4 Identify H&S risks and implement appropriate controls to prevent harm and protect assets.
- 4.5 Oversee H&S performance reporting by utilizing leading indicators to monitor progress and drive improvement
- 4.6 Ensure the availability of competent personnel to support Group and Business Service leaders.
- 4.7 Promote and support employee wellbeing.

5 Context of Organisation





HEALTH AND SAFETY STATEMENT OF INTENT

INTENT

As a leading international law firm, we are dedicated to fostering healthy working environments that strive for zero harm across our global operations. We are committed to adhering to all applicable H&S legislation and industry standards. Our proactive initiatives are designed to promote operational excellence and effectively manage H&S risks within our core business functions and office locations.

We are committed to:

Compliance with relevant H&S legislation, guidelines, industry standards and best practices	Reporting and investigating incidents to prevent future occurrences and foster a culture of safety
Evaluation and oversight of Service Partners	Competent safety leadership, consultation, and promoting employee safety
Recognising employees' right to refuse unsafe tasks	Monitoring and enhancing employee well-being
Engaging with all stakeholders to facilitate the successful implementation of H&S responsibilities	Preventing significant injury, health risks and substantial damage
Assessing H&S risks and establishing effective controls through hazard elimination or mitigation	Conducting inspections, audits, and lessons learned initiatives
H&S performance reporting to monitor performance and facilitate continuous improvement	Provision of relevant information, guidance, and training programs

All employees are responsible for translating these commitments into positive actions.



Name: **Andrew Johnston**

Signed:

Position: **Managing Partner**

Date: **June 2025**

For and on behalf of Addleshaw Goddard



The statement will be communicated to all relevant stakeholders and incorporated into all H&S inductions. This policy will be reviewed periodically to ensure its continued relevance and appropriateness.

7 Organisational Roles & Responsibilities for Health and Safety

7.1 Managing Partner

Accountable for establishing and maintaining H&S to protect people from harm, prevent damage to assets, mitigate legal risk, and uphold the reputation of AG. This includes, but is not limited to:

- Ensuring that H&S objectives and arrangements are established and that leadership is responsible for effectively managing H&S within their respective areas of responsibility,
- Appointing a competent person to lead and drive AG H&S,
- Considering H&S during the planning and implementation of AG business strategies,
- Approving sufficient H&S resources to meet H&S objectives.
- Periodically review H&S performance to verify compliance with AGH&S objectives, arrangements and strategies and respond appropriately to anomalies,
- Informing the AG Board of any H&S issues that may affect or incur adverse publicity,

7.2 Executive Team, Group & Business Services Leaders

Responsible for the implementation of H&S objectives and arrangements within respective business units, and in particular for;

- Ensuring that the necessary arrangements are in place for managing H&S effectively and that the management and line supervision are accountable for H&S in their respective areas,
- Ensuring business units have appropriate H&S processes in place to support respective undertakings,
- Ensuring there are sufficient resources available to meet business unit H&S objectives.
- Ensuring arrangements are in place for consultation with stakeholders and that they are involved in decisions relating to H&S,
- Including H&S on the agenda of management meetings,
- Ensuring suitable controls are in place for the effective H&S management of suppliers, temporary workers, and contractors.
- Informing the Managing Partner (via the Exec. Team) of any significant H&S issues that may affect or incur adverse publicity for AG,

7.3 Health Safety and Business Continuity Manager

Provide strategic H&S direction to the business for implementation of H&S objectives and arrangements through core actions, and in particular for;

- Directing the H&S program for AG,
- Establishing and maintaining a consistent H&S performance reporting system across the business and update the operational exec. of developments on a regular basis,
- Identify significant H&S risks to business units and drive H&S strategies to address them,
- Oversee H&S implementation, assess compliance, identify areas for improvement, and recommend corrective actions,
- Informing the Operations Exec of any significant H&S issues that may affect or incur adverse publicity,
- Design and implement HSE training program,

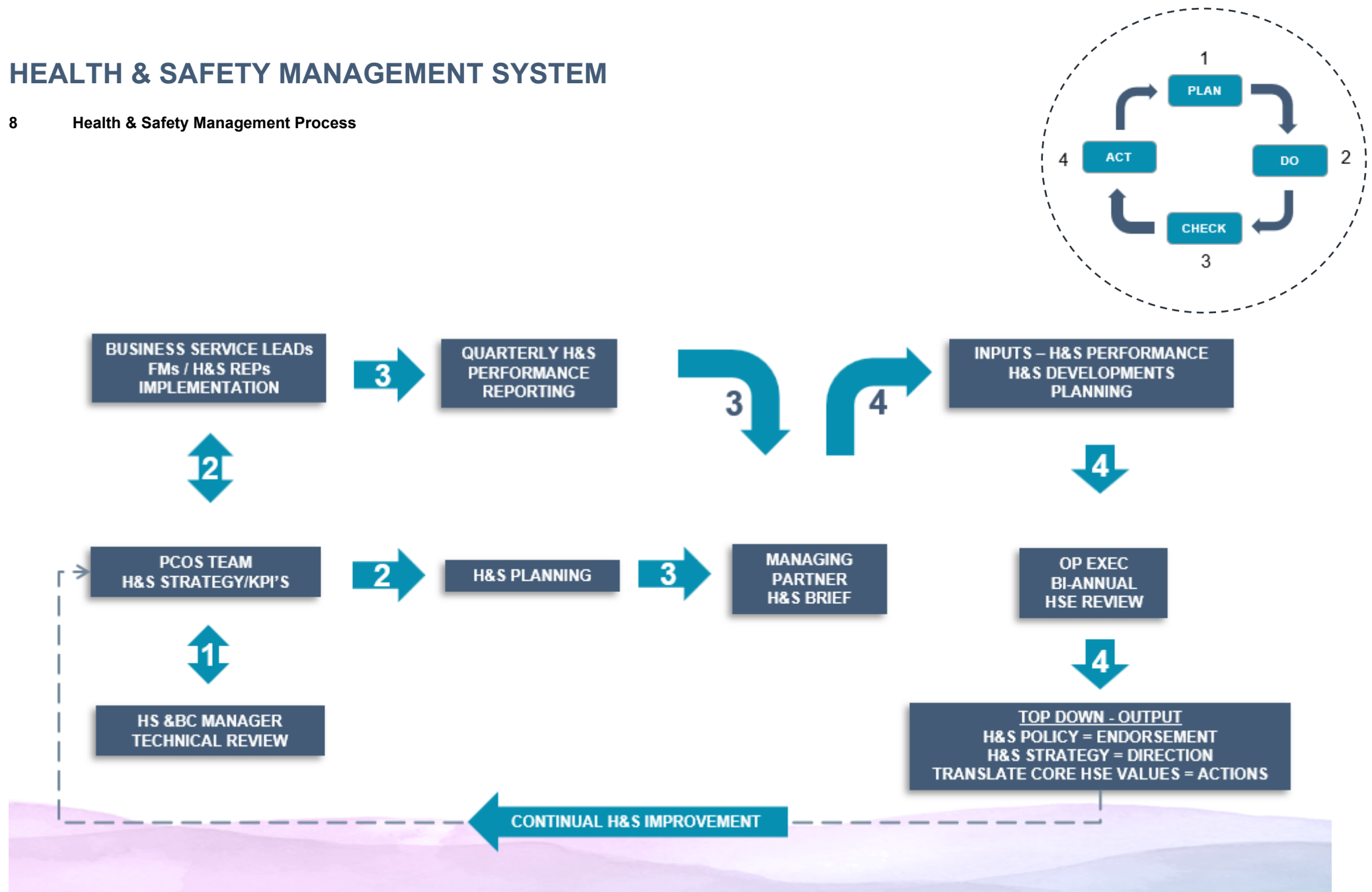
- Provide H&S input to support new business development strategies such as pre-qualifications and new contracts bids.

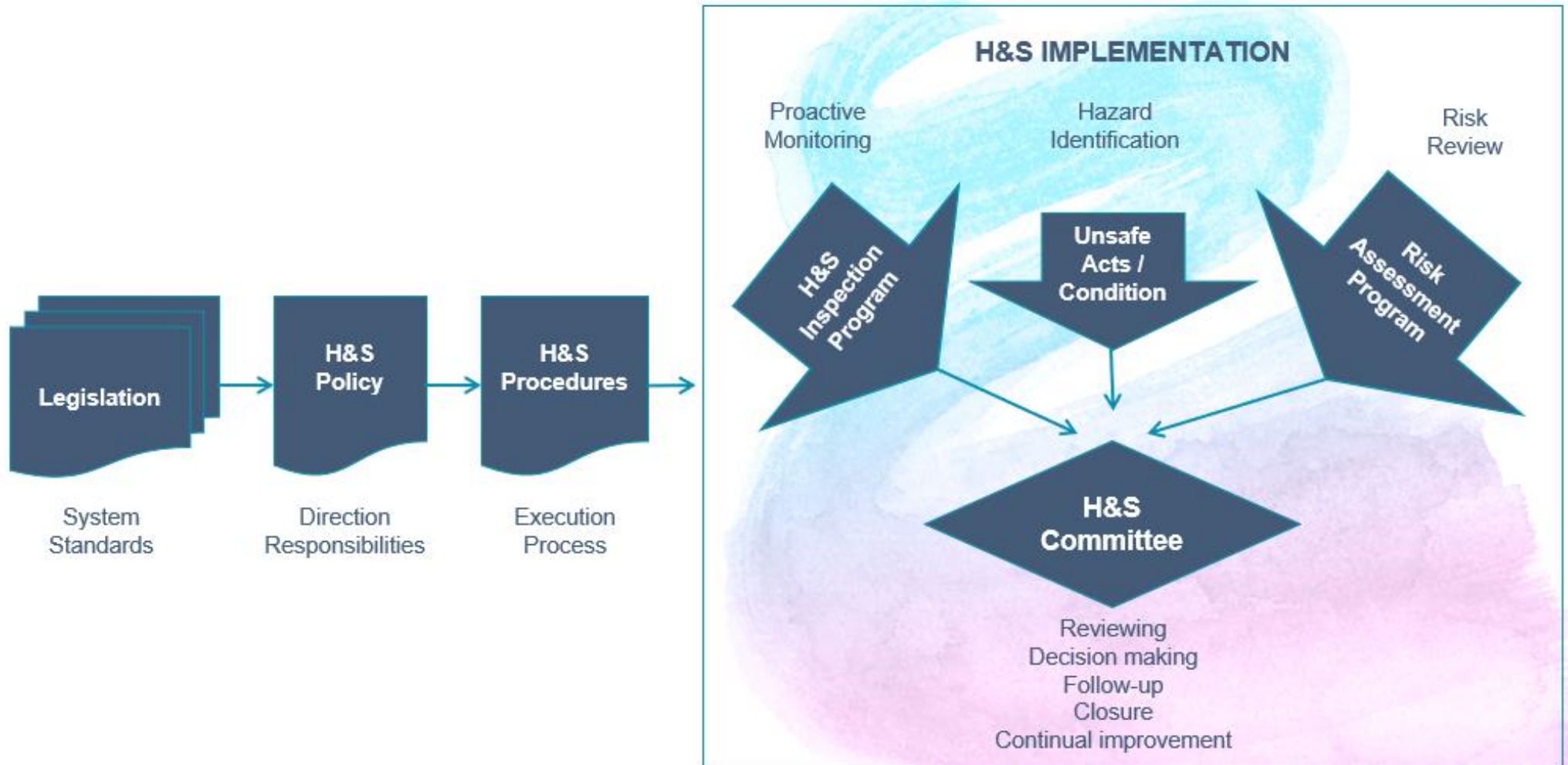
7.4 **Employees**

- People have obligations to take reasonable care for the H&S of themselves and others who may be affected by their acts at work.
- To cooperate with line supervision and management by translating AG H&S objectives into tangible results.

HEALTH & SAFETY MANAGEMENT SYSTEM

8 Health & Safety Management Process





8.2 Arrangements for Health & Safety

(a) Consultation & Participation of Workers

We will ensure that all employees are consulted on all relevant aspects of Health and Safety in the workplace, this could include the following:

- The introduction of any measure which may substantially affect their health and safety at work, e.g. the introduction of new equipment or new systems of work, such as the speed of a process line or shiftwork arrangements.
- Arrangements for getting competent people to help them comply with health and safety laws (a competent person is someone who has the necessary
- Knowledge, skills and experience to help an employer meet the requirements of health and safety law).
- The information you must give your employees on the risks and dangers arising from their work, measures to reduce or get rid of these risks and what employees should do if they are exposed to a risk.
- The planning and organisation of health and safety training; and
- the health and safety consequences of introducing new technology.

We positively encourage the involvement of all employees in health and safety matters through individual consultation or representative discussion through consultation with their managers

Regular consultation and communication will be achieved through regular informal staff meetings and briefings

Are employees members of a recognised trade union?

Representatives of employee safety (ROES)

Elected by the workforce, where the employer has decided not to consult directly

Representing the employer on:

- Potential hazards and dangerous occurrences
- General matters affecting H&S of the employees they represent
- Specific matters on which the employer must consult
- Represent employees in dealings with H&S inspectors

(b) **Risk Assessment**



(c) **Communication**



(d) **Competence. Awareness and Training**

Screening

- Education
- Training
- Examination (Qualifications)
- Experience



Onboarding

All new employees will receive a formal H&S induction to the Company.
This training may be repeated as management or supervision identifies the need for people to receive refresher training.
Records of induction shall be maintained on file.



Vocational Training Needs

- Future demands related to strategic and operational plans and objectives
- Anticipated management and workforce succession needs
- Changes to the Company's processes
- Evaluation of the competence of an individual to perform defined duties
- Statutory and regulatory requirements and standards, affecting Company and its clients.



Sources of Training

- Outside courses
- On Job Training
- Group Workshops



Training Plans

- Training Matrix
- Records of Training



Job Descriptions

- Qualifications
- Experience
- Role and Responsibilities

(e) **Emergency Preparedness**

Emergency Classification

GOLD – Strategic off-site team, responsible to escalate major incidents to Board.

SILVER – Tactical off-site team, responsible to escalate significant incidents to the GOLD Team.

BRONZE – Operational on-site team, responsible for immediate emergency response

Emergency Scenarios

- Fire / Arson
- Natural Disaster
- Pandemic
- Extreme Weather
- Demonstrations / Riots
- Acts of Violence / Terrorism
- Crime
- Extreme Temperature
- Power Outage
- Cyber Attack
- Train derailment
- WFH (House Fire / Gas Leak)

Emergency Response Plan

In the event of an incident, account for Partners & staff, inform and update Group & Business Services.

- Incident Controller
- Communicator (significant incident)
- Fire Wardens
- First Aider

Escalation to major incident

Incident controller cannot resolve the emergency impacting BAU for a prolonged period.

Communication Protocols

No communications, whether verbal or via social media platforms, are to be issued without prior approval from the GOLD Team.

- Inform and update the management regarding the occurrence when it is safe to do so.
- Offsite communications into the incident should only go through the designated Communicator.
- Leadership to Issue communications statement, when required.
- Inform and update Board at regular intervals (when required).

Business Resumption

- Casualty Management
- Post Emergency Action
- Risk Assessment
- Business Continuity Plan

Training

- Identify an emergency scenario
- Familiar with the local emergency response plan
- Identify the location of emergency equipment, evacuation routes and **invacuation plans**

(f) **Performance**

Monitoring Program

- Incident/injury data
 - Fatality
 - Serious Injury/illness
 - Minor Injury/illness
 - Significant property / equipment damage
 - Serious Injury/illness and Fatality (SIF) Near Misses
- Sickness Cases
- Non-loss Incidents: Unsafe Acts and Unsafe Conditions
- Leading and Lagging KPIs



Leading Indicators

- H&S Inspections (H&S Manager, FMs, H&S Reps.)
- Audits (Internal, 3rd party, Clients)
- Emergency Drills
- H&S Meetings / Reviews
- H&S Campaigns



Lagging Indicators

- Complaints
- H&S non-conformance issued
- Corrective Action Notices (Warning, Improvement & Prohibition)
- Breach Notices (Fines and Penalties)
- Court Prosecutions
- Construction Project Work Stopped – Unsafe Acts and Unsafe Conditions



The management team shall review the performance.

(g) **Internal Audit**

Scheduling

- Sufficient scope to ensure that all significant aspects of the Management Systems are audited.
- Third Party 'supplier / venue' audits may be audited based performance.
- Should a major breach become apparent an unscheduled Audit, at 24 hours' may be initiated.



Planning and Preparation of Audit

- Initial contact, communicated via e-mail or formal meeting.
- Agree a mutually convenient date(s).
- Identify the Audit scope and criteria.
- Request familiarisation (if applicable).
- Request Management and/or senior representatives to attend.
- Prepare an audit checklist, based upon the audit scope and the elements to be audited.



Audit

- Controlling procedures have been identified.
- Correct SSOW are being followed.
- That correct documents and/or drawings are available.
- That correct standards and specifications are being used.
- That adequate records are being generated and maintained.
- That the work is adequately supervised.



Audit Report

- Purpose
- Audit Scope
- Audit Criteria
- Summary and Conclusions
- Audit Findings/ Observations



Recommended Improvement Actions

- Action Register: status of an audit finding, whether it is Open, Closed, and Overdue.
- Timely reminders will be sent to follow up a required action.



Follow up and Close Out

- verification formally as a new audit or via informal check.
- When properly implemented, findings updated in action register.

(h) **Incident Recording, Reporting and Investigation**

(Early) Notification of Incident: raised within 7 hours of occurrence.

- Who was involved?
- What happened?
- Where it happened?
- When it happened?
- What has been done and
- What is planned to be done?



Incident Investigation

Identify root causes, system deficiencies, and opportunities for improvement to prevent future incidents, rather than assigning blame. All incidents, including Serious Injury and Fatality (SIF) near misses, should be reported transparently.

- conduct as soon as reasonably practicable; within 72 hours post incident.
- Gather information; Scene Diagrams/Photos, Witness Statements, Records, Procedures etc.
- Analyse the cause, based on the unsafe acts or unsafe conditions.
- Identify controls to prevent reoccurrence.
- Implement a timely remedial (Action) plan.

identify improvement actions to reduce future harm or loss.



Incident Report

- Recorded within 5 days.
- Metrics:
Trends, Time of Day, Work Activity, Personnel.
- Data insights monitored by OP Exec.:
Fatalities, Serious injuries-illness, minor Injury-Illness, SIF Near miss, unsafe acts & conditions, Damage.



Lesson Learned

- Define what happened
- Establish what should have happened
- Identify, locate, and describe the change; what, where when and to what extent
- Specify what 'was' and what 'was not' affected
- Identify the distinctive features of the change



Corrective Action (Register) Plan

(i) **Improvement**

An assessment of the appropriate measures for addressing any non-conformities should be conducted. The extent of the corrective actions taken should be proportionate to the associated risk, magnitude, and nature of the issue.

Internal Audit NCR's

Identified during planned internal audits of management systems, suppliers, and site inspections.

External Audit NCR's

Initiated by the potential client's audit team or certification authorities.

Classification of NCRs

Major: Notable discrepancies affecting statutory requirements.

Minor: No significant impact; these are considered as opportunities for observation or improvement.

Evaluation

- Extent of any improvements.
- Potential impact on operational efficiency, compliance, safety, and well-being.
- Documented within management review outputs.
- Informing plan adjustments and supporting ongoing continuous improvement efforts.

Investigation of Potential Causes

- Identify corrective actions to address and eliminate any underlying issues.
- Assess whether an isolated incident or indicative of a broader systemic problem.
- If a systemic issue is identified, conduct a thorough root cause analysis.
- Review current procedures and modify requirements as necessary.

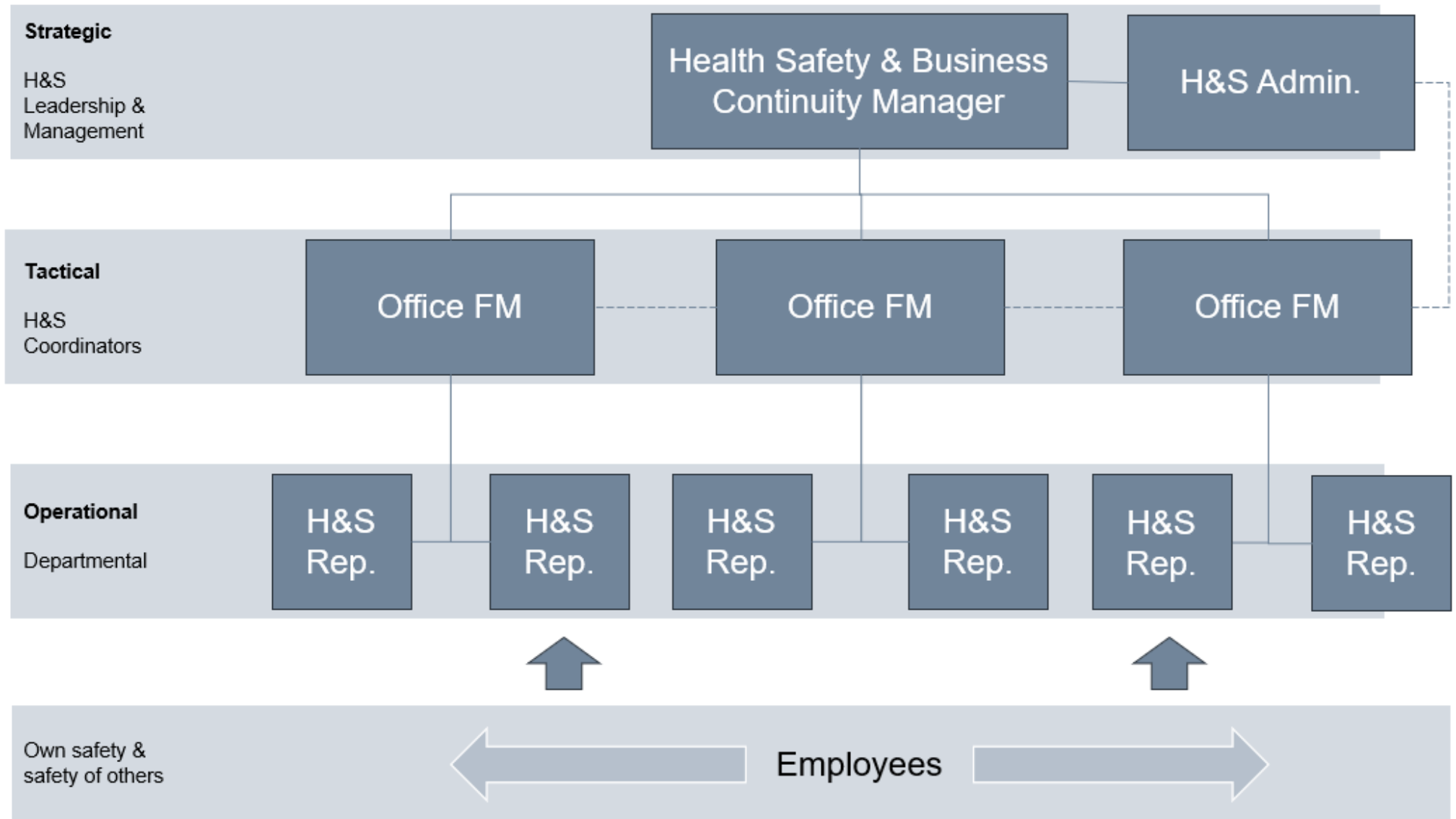
An Action Register shall be maintained and regularly reviewed to assess the effectiveness of the implemented actions.

(j) **Employee Health & Safety Handbook**

This separate document outlines the practical arrangements in support of the HSMS approach and provides employees with the systems to maintain a healthy working environment and ensure compliance.

APPENDICES

(a) H&S Organisation



DOCUMENT CONTROL:

HEALTH AND SAFETY POLICY

DOCUMENT CLASSIFICATION

DOCUMENT TYPE	CLASSIFICATION	DATE
Policy	Viewed	22/08/2017
Policy	Viewed	10/09/2018
Policy	Viewed	26/07/2019
Policy	Viewed	16/07/2020
Policy	Viewed	08/07/2021
Policy	Viewed	06/07/2022
Policy	Viewed	26/07/2023
Policy	Viewed	31/07/2024
Policy	Viewed	02/06/2025

VERSION CONTROL

VERSION	STATUS	DATE
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0.6	Reviewed	06/07/2022
0.7	Reviewed	26/07/2023
0.8	Reviewed	31/07/2024
1.0	Reviewed	02/06/2025

DISTRIBUTION

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AG	Various	10/09/2018
AG	Various	26/07/2019
AG	Various	16/07/2020
AG	Various	08/07/2021
AG	Various	06/07/2022
AG	Various	26/07/2023
AG	Various	08/08/2024
AG	Various	02/06/2025

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Mick Quinn	Health Safety & Environment Manager	16/07/2020
Mick Quinn	Health Safety & Environment Manager	08/07/2021
Mick Quinn	Health Safety & Business Continuity Manager	06/07/2022
Mick Quinn	HS&BC Manager	26/07/2023
Andrew Slater	HS&BC Manager	31/07/2024
Andrew Slater	HS&BC Manager	30/01/2025
Gary Buckett	HS&BC Manager	02/06/2025

AUTHORISATION

NAME	POSITION	DATE
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John Joyce	Managing Partner	08/07/2021
John Joyce	Managing Partner	06/07/2022
John Joyce	Managing Partner	26/07/2023

Andrew Johnston	Managing Partner	08/08/2024
Andrew Johnston	Managing Partner	19/06/2025

DOCUMENT REVIEW

DATE	COMMENT
22/08/2017	This document shall be reviewed periodically

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