



Group HSE

SIG Group Health, Safety & Environmental Policy

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Last reviewed	September 2026
Version	v 2

INTRODUCTION

We are committed to providing safe, healthy working environments and a culture where health, safety and the environment are integral to our business activities and all our people actively engage in our drive for excellence.

We believe that nothing is so important that it cannot be done safely and that a safe, healthy workplace is the cornerstone of a sustainable, profitable business. Our aim is to provide a culture where health and safety are an inherent part of our business activities and where we strive to ensure everyone associated with our undertakings goes home safe and well. We will continuously strive to develop and maintain best practices, seeking continual improvement and innovation in health, safety, and environmental (HSE) aspects across all business activities. To achieve this we will set objectives, which will require all Operating Companies (OpCos) to establish HSE plans and strategies. These plans will be regularly reviewed to ensure they are suitable and sufficient to achieve our goals.

This policy also applies to contractors, agents, consultants, and any others working for or on behalf of SIG plc.

In this document 'SIG' refers to SIG plc and its affiliate companies. 'Our' and 'we' refers to SIG plc.

PRINCIPLES

We have developed a comprehensive set of safety principles which set the standards in our businesses. As a minimum, we commit to complying with all local legal requirements in whichever jurisdiction we operate. Where there is a difference between our corporate policies and standards and those in the local jurisdiction, we will always comply with the higher standard.

The ultimate responsibility for HSE rests with the Group Board, represented by the Group Chief Executive Officer. This responsibility is cascaded through the organisation via the OpCo Managing Directors within the Executive Leadership Team and their leadership teams.

Everyone in or associated with our business has a part to play in ensuring their own health and safety and that of those who may be affected by their actions. We expect our people to respect and commit to our HSE policy, rules, and principles, to work safely together with integrity and trust, and to actively engage and participate in all HSE training and activities.

We commit to actively engage with our colleagues, contractors, stakeholders and partners on HSE matters and we will listen and respond appropriately to all suggestions, issues, and ideas. To enable this, we expect our colleagues to constructively challenge unsafe situations and behaviours, in the knowledge and understanding that health and safety concerns will be listened to and dealt with appropriately and all suggestions and ideas will be considered.

We will provide the necessary resources in all our OpCos to enable fulfilment of this policy, any local legal requirements and all corporate HSE policies and standards.

LEADERSHIP AND ACCOUNTABILITY

Everyone in or associated with our business has a part to play in ensuring their own health and safety, and the health and safety of those who may be affected by our activities.

It is the responsibility of the Managing Director (MD) and Leadership Team of each OpCo to ensure that the organisation and arrangements for implementing the Group HSE Policy and Principles and for complying with all local legal requirements, are in place and are documented.

Each OpCo MD and their Leadership Team is responsible for the development and communication of strategies to provide for the implementation of effective HSE management in their business. They are accountable for the overall HSE performance of their business and for decision making consistent with the Group's HSE Policy and strategy.

Each Leadership Team member will promote the importance of HSE, including leading by example and engaging employees at all levels in conversations about HSE matters, to foster a strong HSE culture within their business.

Line management is accountable for the overall HSE performance of their people, sites, and operations, and for making decisions consistent with the Group and OpCo HSE Policy and strategy. Line management is also accountable for the implementation of all legal and SIG compliant HSE requirements and processes in their area of control, and for facilitating the timely completion of relevant actions from audits, inspections and assessments.

All levels of management will be visible, leading by example in the workplace on HSE matters, engaging employees, customers, and contractors in conversations about HSE, and participating in relevant HSE meetings, education and training. Managers' and employees' HSE performance and behaviours will be taken into consideration during the performance appraisal process as well as for career progression.

We expect all our colleagues to respect and commit to our HSE policy, rules and principles, to work safely together with integrity and trust, and to actively engage with and participate in, applicable health and safety activities.

ROLES, RESPONSIBILITIES AND EXPECTATIONS

Everyone in the organisation is provided with clearly defined and documented HSE roles, responsibilities and expectations. This supports the understanding that HSE is an integral part of everyone's job and contributes to clarifying accountability, training needs and personal performance objectives.

To ensure that management is adequately supported, guided, coached, and challenged in the HSE aspects of business activities, each Opco will have a directly employed HSE function. This function will be provided with the resources to enable effective support to the OpCo and / or Group on HSE matters.

Each OpCo will maintain its own HSE Policy Statement in line with the Group HSE Policy. A copy will be prominently displayed in the local language at all relevant SIG locations, to enable all employees to be aware of and understand its content.

HEALTH SAFETY AND ENVIRONMENT IMPROVEMENT PLANS

To effectively implement the Group HSE Policy and Principles and local legal requirements, each OpCo will have in place a documented HSE improvement plan.

The plan should incorporate timebound actions considering all relevant HSE aspects, including:

- Continuous improvement opportunities relating to the Group HSE Principles and Guidance documents.
- Lessons learnt from events.
- Audits, site visits, employee suggestions and inspections.
- Internal or external information sources (safety bulletins, regulatory guidance).
- Networking and external benchmarking visits.

Each OpCo's MD will ensure that the relevant resources (people, time, money) are available to implement the action plan.

FACILITIES

New facilities and modifications to existing facilities will be designed, procured, commissioned, and constructed to enable safe, healthy and environmentally sound workplaces and cultures.

Existing facilities will comply with all applicable local legal requirements and aspire to the Group HSE Principles in relation to employee health, safety and welfare and protection of the environment.

RISK MANAGEMENT

Our commitment is to provide safe, healthy working environments and cultures, where HSE is integral to our business activities. The Group HSE Principles address the main potential hazards in our businesses, however they do not cover every possibility or circumstance.

At OpCo and site level, as well as across office and central functions, tools and initiatives will be defined to address local risks. Group functions and OpCos will provide the resources and systematic processes to prioritise, manage and address risks in a sustainable manner.

Risks will be assessed and managed, both predictively (with the aim of devising safe working procedures) and dynamically (i.e. just before carrying out a task). Risks should be assessed by trained and competent people, including those knowledgeable of the task or activity.

Once risks are assessed, they should be managed according to priority and within reasonable timescales. Where control measures are medium to long term projects, an interim solution to manage the risk to an acceptable level should be implemented until the final controls are installed.

Control measures should be devised following the principle of Hierarchy of Control, focussing on eliminating, substituting, or isolating the risk. Only when it is not practicable to do so

should administrative controls be used (including instruction and training). The use of PPE is the last choice in addition, or when other controls are not practicable.

EMERGENCY PREPAREDNESS

At branch and site level (including office sites), procedures and resources will be in place to ensure emergencies, for example serious incidents, fires, or health events, are effectively managed. This typically includes competent response teams such as first aiders and fire marshals, first line of response fire-fighting equipment, and regular drills and evacuations.

Group functions and OpCos should maintain a business continuity plan for cases where an emergency escalates into a critical situation.

INSPECTING AND AUDITING

Each OpCo will regularly assess its compliance with the Group HSE Policy and Principles as well

as its own arrangements, procedures and local legal requirements, through audits managed at OpCo level. External audits supplement this where relevant.

Audit results should be reported to OpCo leadership, who are then responsible for agreeing and owning the actions to address findings in a timely manner.

At a local level, branch and site managers will provide their own inspection processes, focused on operational HSE. The local HSE team will provide information and support for this process.

A programme of OpCo assessments will be undertaken annually to establish trends and to facilitate the sharing and development of best practice in EHS.

EMPLOYEE / STAKEHOLDER ENGAGEMENT

Group and OpCos will implement activities and processes that actively engage our colleagues, contractors, and other stakeholders in relation to HSE. These activities and processes will give opportunity for employee and stakeholder suggestions, ideas and issues to be raised, listened to and positively responded to.

Group and OpCos will provide an environment where unsafe situations and behaviours can be constructively challenged, in the knowledge and understanding that HSE concerns are listened to and dealt with appropriately – and all suggestions and ideas are considered.

FURTHER GUIDANCE AND SUPPORT

If you have any questions on the content of this policy, or need further guidance or support, please contact your local HSE or HR Representative. You can also find further information on raising concerns in:

- Group Whistleblowing Policy
- Group Health and Wellbeing Policy

- Group Code of Conduct Policy
- Group Corporate Social Responsibility Policy
- Local disciplinary and grievance policies
- Local anti-bullying and harassment policies