

Standards for Subcontractors

HS-MCS-D-001

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General Health & Safety requirements

It is clearly understood that there will be a number of different classes of subcontractor working on behalf of Eon Control Solutions ranging from small companies with few employees to large multi-national organisations. However, whilst there may be variations in the level of detail or complexity required in management systems and work method statements, no variation in reasonable standards of health and safety performance will be permitted.

In order to assist our subcontractors in delivering these standards, the following section provides an outline of the safety management arrangements that Eon Control Solutions will expect subcontractors working on our behalf to demonstrate. Later sections will cover issues like plant, machinery and site management.

1.1 Health & Safety management

Throughout the progress of the work, subcontractors must comply with their duties under the Health and Safety at Work etc. act 1974 and the Management of Health and Safety at Work Regulations 1999.

Subcontractors will be responsible for ensuring the standards outlined in this document are met throughout their engagement with Eon Control Solutions. This responsibility extends to the activities of any appointed sub-subcontractors under their control. Subcontractors are reminded that further sub-contracting of works to a secondary tier of sub-contractor is strictly prohibited without the written permission of the Eon Control Solutions.

Eon Control Solutions reserves the authority to stop any subcontractor working if, in their opinion, this is necessary in the interests of health and safety. Eon Control Solutions will not accept liability for any loss incurred by a subcontractor due to the stoppage of work if that subcontractor has infringed contract requirements, operational safety rules, health and safety legislation or the standards outlined in this document.

1.2 Pre-qualification

Regulations impose a duty on Eon Control Solutions to make reasonable enquiries regarding the suitability, competency and knowledge base of our subcontractors, so that we can ensure they meet their statutory obligations.

Eon Control Solutions will only work with registered companies that have been awarded approved subcontractor status as a result of a detailed health and safety assessment. In order for any company to progress to 'approved status' a Health and Safety Competency Questionnaire must be completed for pre-qualification assessment.

Each subcontractor will be informed of their assessment results and notified of any outstanding requirements to be implemented in order to improve this status as required.

We require each subcontractor to commit to the minimum safety standards and conditions as set out within this document. A signature is requested within the questionnaire to confirm this commitment.

1.3 Health & Safety policy

The Health and Safety at Work Act requires companies employing more than five staff to maintain a documented health and safety policy. A copy of the subcontractor's health and safety policy will be requested as part of the pre-qualification process. Health & safety policies should be understood and acted upon by all employees within the subcontracting company. A copy of Eon's Health and Safety Policy is located in **Appendix 1 (Page 17)** of this document.

1.4 Health & Safety management systems

As part of the pre-qualification process subcontractors will be required to provide details of effective arrangements for the management of Health & Safety. Management system assessment will be made subjectively in relation to contract scope and levels of associated risk.

All management systems must take into account relevant aspects of health & safety, particularly the use of sub-subcontractors and protection of third parties (e.g. members of the public). Systems should also include;

- Clearly defined duties and responsibilities of management and supervisors
- Details of how you intend to comply with your health & safety policy
- Arrangements for dealing with common hazards
- Periodic reviews of the management system

For small companies, as an absolute minimum Eon Control Solutions would expect documentary evidence of roles and responsibilities, insurance cover, certificates of competence, risk assessments and safe working method statements to be made available.

1.5 Competence and training

Subcontractors must ensure that their personnel and any sub-subcontractor under their control have the correct authorisation, competence and training for the tasks that they are undertaking. Demonstration of competence forms a key element of the pre-qualification process.

We require that competence be supported, as a minimum, by a valid, current CSCS, CPSC or CISRS card. The following requirements also apply:

- Anyone involved in surveying, demolition and/or refurbishment work" must have undertaken an asbestos awareness course
- Crane operators must hold specific crane's CPCS certification.
- Slinger/signallers must hold CPCS certification.
- Mobile towers must be erected by a trained scaffolder or operative with PASMA certification.
- Subcontractors operating mobile towers must be aware of requirements for the safe use of towers (Manufacturers" instructions must be available on site).
- All scaffolders must hold appropriate certification, under the CITB Scaffolders Registration Schemes (CISRS) and comply with NASC Guidance SG4:15.
- Drivers must hold the appropriate license for specific type of vehicle e.g. HGV
- Electrical technicians must hold NICEIC or ECA certification
- All operators of plant and equipment that are covered by CPCS/IPAF schemes must hold appropriate certification for specific type of machine e.g. MEWPs.
- All supervisors must demonstrate sufficient levels of competence and retain an appropriate level of training in relation to the work being undertaken. For example; CITB Site Supervisors Safety Training Scheme (SSSTS), a relevant CSCS/ECS skills card and suitable First Aid qualification.
- All managers must demonstrate sufficient levels of competence and retain an appropriate level of training in relation to the work being undertaken. For example; CITB Site Managers Safety Training Scheme (SMSTS), a relevant manager's CSCS/ECS skills card and suitable First Aid qualification.

Subcontractors must also provide sufficient resources to satisfy necessary safety appointments, including first aiders, fire/emergency co-ordination and/or appointed person/supervisors for lifting operations, as identified prior to award of the sub-contract. If it is found that a particular individual does not hold proof of competence, the subcontractor will be responsible for providing verification of the individual's suitability.

1.6 Risk assessment and method statements (RAMS)

The Management of Health and Safety at Work Regulations requires all employers and self-employed persons to carry out a suitable and sufficient assessment of the health and safety risks to workers for work activities undertaken and to record this.

Eon Control Solutions requires its subcontractors to provide comprehensive, robust risk assessments that clearly identify how each of their activities will ensure hazards and their associated risks are removed or reduced as far as possible.

Subcontractors must assess the health and safety risks associated with their work activities and identify suitable and effective control measures to be used to combat these risks.

A method statement is required to describe the sequence of carrying out a work activity and to detail how control measures will be implemented. The method statement therefore needs to be written in conjunction with, and refer to, the relevant risk assessment(s). It may also require further supporting documentation e.g. COSHH assessments, technical drawing.

Eon Control Solutions expect that:

- Site specific risk assessments and method statements (RAMS) must be completed and forwarded to Eon Control Solutions 7 days prior to work commencing. This will allow Eon Control Solutions to review and disseminate RAMS to applicable parties (Clients, Principal Contractors) for approval.
- All site operatives must read and understand the RAMS prior to work commencing.
- The agreed method of work must be adhered to at all times, failure may result in work being stopped and operatives being removed from site.
- RAMS should be reviewed and revised as necessary to accommodate any changes in methods of working, plant, equipment, materials or site conditions.
- Revised RAMS must be forwarded to Eon Control Solutions for review and approval prior to work commencing.

Although Eon Control Solutions reviews subcontractor RAMS prior to the commencement of work, it shall be noted that the responsibility to eliminate or reduce risks to as low as reasonably practicable rests with the subcontractor.

Where RAMS are reviewed and deemed to be insufficient or incomplete (either in content, clarity, depth or scope of information), they must be amended and re-submitted for review and approval prior to work commencing.

1.7 Communication & meetings

Subcontractors must ensure that everyone working on their behalf, including agency workers, understands the agreed safe methods of work and risks involved, prior to any work being permitted to start. Subcontractors will encourage feedback and comments on safety matters, attend safety meetings and assist with safety monitoring programmes as required.

The subcontractor's Site Manager is responsible for ensuring that the following meetings are attended by subcontractor's representatives (at their own cost):

- Pre-start meetings to agree site set-up requirements, the availability of subcontractor's risk assessments/method statements, site safety and environmental controls and waste management
- Progress meetings to review the on-going suitability and adequacy of the above
- Safety meetings to discuss issues related to the site

- Meetings to discuss and review specific safety and environmental procedures e.g. evacuation arrangements to reflect changing hazards

1.8 Toolbox talks

Subcontractors will ensure that safety toolbox talks are held on site. The subcontractor's supervisor should select a suitable topic and address the workforce on the general safety requirements of that subject. A record of each tool-box talk, listing those who attended, should be maintained and forwarded to Eon Control Solutions for review.

Where toolbox talks are administered by Eon Control Solutions, subcontractors are reminded attendance is a mandatory requirement.

1.9 Permits to work

Where hazardous elements of an operation are undertaken, a permit to work system may be put in place. This will be identified within the relevant Method Statement and Risk Assessment.

Examples of high-risk activities that require a Permit-to-Work include (but are not limited to):

- Working in a confined space
- Working at height
- Live electrical works
- Hot works

Once the client has agreed the safe system of work, the subcontractor obtains a Permit-to-Work from either Eon Control Solutions or the client (or their representative) prior to starting the work activity on a daily basis.

Once issued, the subcontractor is responsible for ensuring the scope of the activity is as expressed within the Permit and for ensuring all safety control measures are maintained for the duration.

The subcontractor must present the Permit at the end of each day to either Eon Control Solutions or the client (or their representative) for review and sign off.

Permits-to-Work will generally be issued by the client in respect of the following works carried out on customer's premises, in the event that a project requires Eon Control Solutions to provide electrical Permit-to-Work this shall apply for the following tasks:

- Switching off any switch fuse, distribution board, or mains circuit board that may affect critical systems, the safety of client's staff or any other person working on or visiting the premises.
- Work on live electrical apparatus.
- Work on electrical distribution systems that need the installed safety systems/barriers defeated or removed.
- Work on electrical distribution systems that expose personnel to shock hazards.
- Work on remote and automatically controlled low voltage switch-gear.
- Work on any earthing system whilst the supply is still live.

All Permits to Work for work on electrical equipment shall be issued by an Authorised Person (Electrical Services) in accordance with Eon Control Solutions procedures for Permit-to-Work or by the clients/principal contractor's authorised person. A Permit-to-Work is not required for the following work if it is carried out by a competent person (electrical services) or authorised subcontractor;

- Isolation of electrical distribution systems and equipment to make them safe
- Replacement of electrical outlets, fittings equipment and fuses that have been made safe
- Installation of new electrical fittings, outlets and equipment

1.10 Accident, incident & near miss reporting

As soon as is reasonably practicable (within 24 hours), subcontractors must report any accidents, incidents or near misses to Eon Control Solutions at the earliest opportunity regardless of how small or insignificant.

Subcontractors must also provide a copy of the Accident Book entry and/or subsequent investigation, in order for Eon Control Solutions to accurately record and manage accidents effectively and to assist in future prevention.

Where a subcontractor does not provide their own accident book, they will be required to follow Eon Control Solutions Accident Reporting procedure. Notwithstanding the requirements of the Data Protection Act 2018, subcontractors are reminded of their duty to co-operate with reasonable requirements of the Principal Contractor under the CDM Regulations 2015.

Where there is a reportable injury or disease, subcontractors will inform the Health and Safety Executive (HSE) directly, as required under the Reportable Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.

The subcontractor will also provide the Senior Manager with the following information:

- A copy of the Accident Book entry
- Copies of any witness statements
- The results of an in-depth accident investigation undertaken by the subcontractor
- A copy of the completed F2508 form issued to the HSE
- Copies of any further information or evidence e.g. photographic evidence

Subcontractors are required to keep Eon Control Solutions informed of the subsequent development of long-term injuries, diseases and dangerous occurrences.

Subcontractors must co-operate fully with any on-going accident investigation undertaken by the representatives of Eon Control Solutions or the HSE, and assist in implementing subsequent remedial actions or preventive measures as required.

Eon Control Solutions must also be notified of any other significant incident e.g. trespass, violent acts, vandalism or near miss that potentially could have caused harm.

Near Miss reporting is actively encouraged within Eon Control Solutions and forms part of a subcontractor's periodic performance review. Near Miss reporting cards are available on request.

1.11 Monitoring, auditing & review

Regular internal audits are undertaken by Eon Control Solutions Managers and the Health and Safety Team as part of our subcontractor monitoring programme.

Subcontractors must co-operate fully with any arrangements made by Eon Control Solutions

Subcontractors have a legal duty to carry out regular inspections of certain work equipment under their control e.g. working platforms, mechanical plant, lifting equipment. Where subcontractors undertake their own inspection regime, Eon Control Solutions will require a copy of inspection reports as and when they are completed.

Eon Control Solutions maintains a system to measure and record subcontractor performance. The system assists Eon Control Solutions to periodically review performance and breaches in compliance in order to optimise resources and agree future resource allocation.

2 Operational standards

Eon Control Solutions is committed to maintaining high standards of health & safety management. These standards apply to our own staff and subcontractors working on our behalf.

Company guidelines on work sites and methods of working are not intended to outline requirements in all situations. They are, however, intended to provide some basic standards that subcontractors are expected to meet.

2.1 Site induction

Subcontractors are responsible for ensuring they comply with 'site signing in' procedures and receive a site induction prior to commencing work.

2.2 Drugs & alcohol

Our Drugs and Alcohol Policy implements control measures to prevent personnel, as far as possible from:

- Carrying out safety-critical work when affected by drugs or excess alcohol
- Consuming drugs or alcohol at work.

Any worker found under the influence or in the possession of Drugs and Alcohol whilst at work will be immediately removed from site, pending a full investigation.

2.3 Smoking

Smoking on site is only permitted in designated areas. Any worker found smoking outside the boundaries of the designated smoking area will be immediately removed from site, pending a full investigation.

2.4 Access & egress

Designated safe access/egress routes must be provided to all work areas/work platforms. These must be maintained free from obstructions at all times to ensure:

- Safe movement of personnel in the event of an evacuation
- Elimination of trip hazards

2.5 Safety rules

As a minimum requirement the following health and safety rules must be observed by all persons whilst working on behalf of Eon Control Solutions:

Ensure

- That you wear the correct PPE at all times whilst on site
- That you observe all H&S signs and notices displayed
- That you keep to the pedestrian access routes

Do not

- Access the site until you have attended an appropriate induction
- Consume food or drink on the site, unless it is within the welfare facilities provided
- Attend site under the influence of alcohol or drugs

- Smoke on site except within authorised areas
- Remove any guardrail or cover to any hole unless you have been given express permission from your supervisor. Ensure protection measures are replaced on completion of your work activities
- Undertake any work unless your supervisor has briefed you on the key aspects of the safe system of work
- Burn any materials on site
- Use radios, Walkman's, MP3 players, iPods or similar on site

Anyone found contravening safety rules may be subject to further action and exclusion from site.

2.6 Asbestos

All subcontractors must have undertaken appropriate asbestos awareness training. Prior to work commencing work all subcontractors are reminded to review the asbestos information for any building.

If at any time a subcontractor suspects any suspicious material of containing asbestos, they should cease work in that area immediately, vacate and prevent others from entering the area and report it to the client/principal contractor and Eon Control Solutions.

2.7 Plant & equipment

Subcontractors are responsible for the safe use and maintenance of all plant and equipment provided on site for use by their workforce. Provision and Use of Work Equipment Regulations (PUWER) requires that equipment provided for use at work is:

- Suitable for the intended use
- Safe for use, maintained in a safe condition and inspected to ensure it is correctly installed and does not subsequently deteriorate
- Used only by people who have received adequate information, instruction and training
- Accompanied by suitable health and safety measures, such as protective devices and controls. These will normally include emergency stop devices, adequate means of isolation from sources of energy, clearly visible markings and warning devices
- Used in accordance with specific requirements for mobile work equipment

Wherever practical electrically powered equipment will be reduced to 110V. Where this is not practical, equipment will be operated in conjunction with a Residual Current Device (RCD). All portable electrical equipment will be subject to an appropriate Portable Appliance Testing regime.

2.8 Electrical work

Subcontractors are reminded the Electricity at Work Regulations 1989 requires every employer to comply with the provisions of the Regulations in so far as they relate to matters which are within their control and in particular:

- All systems shall at all times be of such construction as may be necessary to prevent danger, so far as is reasonably practicable
- All systems shall be maintained, so far as is reasonably practicable, so as to prevent danger
- Every work activity, including operation, use and maintenance of a system and work near a system, shall be carried out in such a manner as not to give rise, so far as is reasonably practicable, to danger
- Any equipment provided under these Regulations for the purpose of protecting persons at work on or near electrical equipment shall be suitable for the use for which it is provided, and be maintained in a condition suitable for that use, and be properly used

Note: Any proceedings against Eon Control Solutions or individuals in relation to The Electricity at Work Regulations 1989 will be regarded as being criminal. All subcontractors who are employed by Eon Control Solutions must comply with the Electricity at Work Regulations 1989 and with IET Wiring Regulations - BS7671:2018 (18th Edition).

Subcontractors carrying out the testing and/or repair of electrical equipment associated with Building Management System (BMS), or associated connections must have appropriate technical knowledge, training and information to enable them to work safely. General guidelines for competence are set out below:

- Practical experience in working with electricity relating to the testing of BMS and an adequate knowledge of hazards.
- Knowledge of current safety standards and a clear, understanding of the precautions required to avoid danger.
- The ability to recognise whether it is safe for work to continue, particularly in respect of unfamiliar equipment and unfamiliar locations.

All electrical work carried out including work carried out by authorised subcontractors shall be subject to risk assessment. The results of risk assessments for work on electrical equipment shall be documented and shall include detailed method statements that record:

- The steps that will be taken to ensure and verify that there is adequate means of access/egress, adequate lighting and adequate safe work space at all electrical equipment on which work is being performed.
- The means by which the electrical equipment to be worked on shall be disconnected from every source of electrical energy.
- The steps that will be taken to ensure that electrical equipment to be worked on has been made dead.
- The precautions that will be taken to prevent electrical equipment, which has been made dead becoming electrically charged during work.
- The personal safety equipment and tools that are required to prevent injury and death.
- The steps that will be taken to ensure that electrical equipment is re-instated in a safe manner.

Subcontractors shall ensure before any work is carried out on electrical equipment that may give rise to danger that there is;

- Adequate working space, access/egress and lighting.
- All necessary steps shall be taken to protect against inadvertent contact with other live parts nearby. This shall be done wherever practicable by the erection of physical barriers and/or the use of temporary insulation.
- No employee shall work on electrical equipment if they are unsure of the requirements of the safe working procedures set out in the safety method statement for the work.
- Before disconnecting or isolating any electrical equipment, the circuit to be worked on, or near, shall be identified. Electrical equipment shall wherever practicable be physically identified. Wherever possible this process should be aided by the use of appropriate drawings, diagrams and other written information. Labelling on circuits and equipment may be used to assist in the identification process, it must however never be assumed that labelling is correct.
- Once the circuit or equipment to be worked on or near has been identified it shall be disconnected from every source of electrical energy.
- Adequate precautions shall be taken to prevent electrical equipment, which has been made dead, from becoming electrically charged during that work. Wherever practicable this should be carried out by locking off all isolators. Where such facilities are not available, the removal of fuses or links is permissible.

- Fuses or links shall be labelled and kept in safe keeping away from the isolator by Competent Person. Under no circumstances must the fuses or links be left unattended by or near the isolator.
- Once isolated a notice or label shall be put at the place of disconnection identifying the distribution board references of the circuits been worked on. This should be supplemented by 'danger' notices adjacent to the place of work indicating nearby apparatus that is still energised.
- It is the duty of all employees to be aware of the Health and Safety Policy that is relevant to their work as well as observing any additional rules and regulations on health and safety provided by the client.
- Having isolated the circuit, equipment and all parts to ensure that they are dead, even if the isolation has been achieved automatically through an interlocking system. If it is a three-phase system or equipment with more than one supply, prove that all supply conductors are dead. The device used for proving dead shall itself be proved immediately before and after testing.
- For High Voltage and stored energy equipment. To ensure that the risk to personnel is minimised, even if the above precautions fail, conductors should be earthed using properly designed earthing devices or earthing leads, usually applied to all points where the circuit or equipment is isolated from the supply. Additional earths at the point of work may also be necessary if this is remote from the point of isolation, but these should be applied only after proving dead at the point of work. The earthing conductors and their connections should be suitable for the energy that may flow in the event of a failure of the above precautions. Earthing low voltage equipment is particularly desirable if there is a risk of re-energisation. In other low voltage equipment, however, it may be physically impractical to apply earths, or the risk of short circuit from introducing an earth near adjacent live parts may outweigh the benefit of earthing the apparatus being worked on.

2.9 Working at height

Where working at height cannot be avoided, subcontractors must consider their method of working in line with the hierarchy of control prior to putting operatives to work. The mode of access to carry out the work is most important and consideration should be given to access arrangements that do not put operatives at unnecessary risk.

Any subcontractor undertaking work at height must be appropriately trained and provide Eon Control Solutions with a detailed risk assessment, method statement and where required, an emergency rescue plan.

Where mechanical means of access is not an option subcontractors must provide safe access for employees working at height. This can be done by the provision of safe scaffold access such as:

- Fixed tube and fitting scaffolding
- Mobile scaffold towers

Collective fall protection must be considered at all times. On floors above ground level and at roof level fixed guard rail edge protection is to be provided comprising double guard rails and toe boards as minimum. These must also be provided around service riser and lift shaft openings.

Where operatives are working at leading edges, suitable fixed distance barriers are to be erected with appropriate signage to protect other operatives. Leading edge operatives must be provided with suitable fall, protection/fall arrest arrangements.

Fall protection arrangements are a last resort and should only be considered where other safe access arrangements cannot be provided e.g. MEWPS or suitable scaffold access arrangements.

Where operatives are working from a running line using a harness the running line must be tested to ensure it is fit for the loads intended, i.e. if used for fall restraint or fall arrest. When operatives are working from a harness the fall protection must be fit for the task

Subcontractors in the safety net rigging and fall arrest industry must be members of the Fall Arrest Safety Equipment Training (FASET) association.

Ladders and Stepladders should only be used for short duration work (30 minutes max) if agreed with by the Client.

2.10 Scaffolding

All subcontractors appointed to conduct scaffolding work must adhere to the Construction Design and Management Regulations 2015, Work at Height Regulations 2005 and the National Access and Scaffolding Confederation guidance. Scaffolding subcontractors must be members of the National Access and Scaffolding Confederation (NASC).

2.11 Crane lifting operations

All project crane lifting operations are subject to specific safe lifting requirements in accordance with the Lifting Operations and Lifting Equipment Regulations (LOLER) and BS7121. All subcontractors appointed to conduct crane lifting operations must appoint a trained Appointed Person (CPCS). They shall be responsible for the effective planning and control of their lifting operations.

2.12 Lighting

Subcontractors are responsible for ensuring the provision of adequate standards of lighting (Task Lighting) required for the safe undertaking of their operations (20-50 Lux).

2.13 Housekeeping

Subcontractors shall be responsible for maintaining an acceptable standard of site cleanliness within their area of works

- All rubbish and debris shall be cleared from the work site on a regular daily basis in progress with the work.
- No excess rubbish or debris will be permitted to be left on site at the end of the working shift.

2.14 Fire prevention

Each subcontractor is required to provide suitable and sufficient resources to ensure the prevention of fire. Where additional emergency arrangements are required, due to the work being undertaken, subcontractors must incorporate these provisions into their Method Statement and/or Risk Assessment(s).

Subcontractors must liaise with Site Management to ensure their emergency arrangements do not conflict with arrangements already in place.

Where Eon Control Solutions act as Principal Subcontractor all fire arrangements will be defined within the project's Fire/Emergency Plan (e.g. Hot Work Permits, Fire Detection and Suppression, Evacuation and Assembly Procedures). The main aspects of the Project Fire/Emergency Plan shall be addressed in the site safety induction.

2.15 COSHH

Working with hazardous substances is regulated by the Control of Substances Hazardous to Health Regulations. Any work activity involving a hazardous substance must be undertaken in line with a specific risk assessment known as a COSHH assessment prior to the operation taking place. Subcontractors should consider the following control measures for hazardous substances in hierarchical order

- Elimination
- Substitution
- Isolation
- Ventilation
- Personal Protective Equipment

Where the use of the hazardous substance cannot be avoided then employers must undertake the COSHH assessment specific to the operation. Due consideration must be given not only to the operatives undertaking the operation but to others who may be within the vicinity of the hazardous operations.

The assessment itself must be based on the information contained within the hazard data sheet relating to the hazardous substance to be used. All employees involved with the use of hazardous substances must be briefed on the contents of the COSHH assessment prior to undertaking the operation.

Any subcontractor using Hazardous substances must include the appropriate COSHH Assessment as part of an overall fully detailed health and safety method statement.

All subcontractors using COSHH materials must ensure the COSHH assessment and Material Safety Data Sheet are stored on site for the duration of time the hazardous substance is stored on site.

2.16 Confined spaces

Where there is a necessity for subcontractors to work within a confined space (i.e. any place including any chamber, tank, vat, silo, pit, trench, sewer, flue, well or similar space in which, by virtue of its enclosed nature, there arises a reasonably foreseeable significant risk), these works must be carried out under the conditions specified within a job specific confined space entry permit. Subcontractors should take due note of the main hazards within confined spaces:

- Oxygen deficiency / displacement – Asphyxiation
- Oxygen enrichment - explosion & fire
- Toxic atmospheres - poisoning/asphyxiation

Any subcontractor undertaking confined space entry work must be appropriately trained and provide Eon Control Solutions with a fully detailed health and safety method statement and emergency rescue plan.

2.17 PPE

Method Statements and Risk Assessments must state what Personal Protective Equipment (PPE) is required to support each work activity and the appropriate PPE must be worn for the work undertaken at all times.

The subcontractors site supervisor and/or manager is responsible for ensuring that personnel under their control are issued with the appropriate PPE and that it is suitably cleaned and maintained.

Minimum mandatory requirements for all construction site personnel are as follows;

Personal protective equipment	Standards
Safety Helmet	EN 397:2012 – Type 1
Hi Vis Vest / Jacket	EN471:2013 – Class 2
Gloves (protection level appropriate for the work)	EN 388:2016 – 4.X.4.2.E (Typically)
Safety Glasses / Spectacles	EN 166:2001 - 1 Optical Class, F Frame strength (Typically)
Safety Shoes/boots	EN345: EN ISO 20345-2011 S1-P or S3

Where additional PPE is necessary, the subcontractor’s method statement will identify the requirements.

All subcontractors are required to ensure that any additional requirements are fully adhered to as and when it is necessary to do so. This will include all dress code requirements e.g. no shorts or vests will be permitted.

2.18 Calibration Equipment & Handtools

To maintain the highest standards of precision and accuracy in our operations, it is imperative that all subcontractors comply with specific requirements regarding the calibration of equipment. Subcontractors are mandated to ensure that all measurement and testing instruments utilised in their processes are calibrated regularly in accordance with industry standards and applicable regulations. Calibration should be performed by accredited calibration laboratories, and a traceable record of calibration activities, including dates, results, and any adjustments made, must be maintained. Subcontractors are responsible for keeping calibration certificates readily available for inspection upon request. Additionally, any deviations from the specified calibration intervals or tolerances must be promptly reported to our organisation for review and approval. Compliance with these calibration requirements is fundamental to guaranteeing the reliability and accuracy of data, fostering quality assurance, and upholding our commitment to delivering products and services of the highest quality.

For the seamless execution of projects and to uphold safety standards, it is essential that all subcontractors adhere to specific requirements concerning the use and maintenance of hand tools. Subcontractors are expected to ensure that all hand tools utilised in their work are of high quality, well-maintained, and suitable for the tasks at hand. Regular inspections should be conducted to identify and promptly replace any damaged or worn-out tools. Subcontractors must provide proper training to their personnel on the correct usage of hand tools, emphasising safety protocols and ergonomic considerations. Tools should be stored securely, easily accessible, and kept in a clean and organized manner. Any hand tools with specific calibration requirements must be calibrated regularly by accredited facilities, and records of these calibrations should be maintained. Compliance with these requirements not only contributes to the efficiency and safety of the work but also aligns with our commitment to delivering projects of the highest quality.

2.19 Supervision

Supervision levels will be determined according to the levels of risk involved and the competence of those undertaking the works. Eon Control Solutions and the subcontractor will agree supervision

levels prior to award of the sub-contract and requirements will be identified within method statements and risk assessments.

Subcontractors who Eon Control Solutions employ must seek written authorisation from Eon Control Solutions when employing agency workers and/or subcontracting works to a secondary tier of sub-contractor, before they can commence on site. Any breach of this may result in suspension of the Contractor from future works.

Subcontractors must be able to declare and demonstrate the level of health and safety training undertaken by their supervisors and/or managers, which should respectively reflect their responsibilities. Subcontractors must provide sufficient resources to satisfy necessary safety appointments, including first aiders, fire/emergency co-ordination and appointed person/supervisors for lifting operations, as identified prior to award of the sub-contract.

2.20 Protection of third parties

Protection of third parties (e.g. the public) is of paramount concern and all arrangements must take into consideration the reduced level of awareness amongst third parties. Any provisions for protecting the third parties defined in the Construction Phase Plan, Fire/Emergency Plan must be adopted by all personnel alike.

Subcontractors must include adequate precautions for third parties and others throughout the duration of the works. Arrangements in respect of the third parties shall be clearly defined within the subcontractor's method statements.

2.21 Misconduct

Eon Control Solutions operate a site misconduct procedure when acting as Principal Contractor. The procedure allows for warnings to be issued and recorded. Implementation of this procedure and authorisation for issuing warnings is at the discretion of the Eon Control Solutions Site Manager.

Any individual who receives a warning for misconduct will be required to leave site with immediate effect. Where warnings are issued, the subcontractor will be required to reply in writing that action has been taken to prevent recurrence of the breach.

3 Other requirements

All subcontractors working on behalf of Eon Control Solutions shall conform to the organisations Quality and Environment, Energy and Anti-slavery policies.

3.1 Quality

Eon Control Solutions is committed to consistently meet our customers' needs and enhance their satisfaction. This is a fundamental part of our values and principals and key to the way we do business. All subcontractors working on behalf of Eon Control Solutions shall commit to conform to the organisations Quality Policy. A copy of Eon Control Solutions Quality Policy is located in **Appendix 2** of this document.

3.2 Environment

Environmental protection is also a fundamental part of Eon Control Solutions values and principals. Care of the environment is key to the way we do business. All subcontractors working on behalf of Eon Control Solutions shall commit to conform to the organisation's Environmental Policy. A copy of Control Solutions Environmental Policy is located in **Appendix 3** of this document.

3.3 Energy

All subcontractors working on behalf of Eon Control Solutions shall commit to conform to the organisations Energy Policy, procedures and energy management system. Eon Control Solutions is committed to reducing energy consumption in all aspects of our business both clients facing and within our own office environments. Eon Control Solutions is actively assessing energy usage across our offices and sites with a view to reducing consumption and emissions. We require the commitment of our subcontractors in realising this aim and would ask that all possible efforts are made to reduce unnecessary energy usage while working on Eon Control Solutions sites.

This will be achieved by:

- Ensuring lights are turned off when leaving un-occupied areas
- Use of electrical equipment is kept to a minimum
- Maintenance and cleaning activities shall be carried out in a safe but energy efficient manner ensuring all plant if left operating in an efficient way
- In case the work involves activities that are energy / CO₂, intensive then subcontractors shall, upon the request of Eon Control Solutions, submit greenhouse gases / energy efficiency management plans.

In carrying these out the benefits will be:

- Cutting costs
- Reduction in greenhouse gases
- Improving sustainability
- Increasing innovation

These efforts will assist Eon Control Solutions in reaching our commitment to achieve their energy and carbon reduction objectives. A copy of Eon's Energy Policy is located in **Appendix 4** of this document.

3.4 Modern Day Slavery

Eon Control Solutions is committed to supporting international efforts to promote ethical principles and practices related to the prevention of the exploitation and abuse associated with modern day slavery and human trafficking as defined in the modern-day slavery act 2015. This states that every business in the UK with a total annual turnover of £36m or more, which applies to Eon Control Solutions, will be required to produce a statement, which must be posted on their website, of steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place both within their business and their supply chain.

Eon Control Solutions expects commitment to these principals from all organisations that we have associations with, and will not support or do business with any company knowingly involved in any act of slavery or human trafficking. A copy of Eon Control Solutions Slavery & Human Trafficking Policy is located in **Appendix 5** of this document.

4 Appendix

4.1 Appendix 1

GROUP HEALTH & SAFETY POLICY STATEMENT

E.ON Control Solutions Limited recognises and accepts its responsibility as an employer for providing a safe and healthy working environment on premises and property under its control in accordance with the requirements of the Health and Safety at Work etc Act 1974. E.ON Control Solutions Limited in the conduct of its activities will ensure that it:



- Protects the health, safety and welfare of employees and others that may be affected by its activities.
- Meet its responsibilities as an employer to do all that is reasonably practicable to prevent accidents, injuries and damage to health.

The Company will also, so far as is reasonably practicable:

- Provide and maintain safe working environments that are without risks to health, safety and welfare.
- Set standards that comply with the relevant statutory requirements relating to health, safety and welfare with regard to the effect on employees, contractors, visitors and the public.
- Safeguard employees and others from foreseeable hazards connected with work activities, behaviour, processes and working systems.
- Ensure that when new substances, plant, machinery, equipment, processes or premises are introduced, adequate guidance, instruction, training and supervision are provided for safe methods of work to be developed.
- Ensure all employees are aware of their own responsibilities in respect of relevant health and safety matters and ensure they participate in the prevention of accidents.
- Actively encourage a positive health and safety culture within the organisation, in particular consulting and openly communicating with employees on health and safety matters.
- Ensure that contractors undertaking work for the Company are informed of the relevant standards required and are monitored to ensure compliance without detracting from the contractors' legal responsibilities to comply with statutory requirements.
- Co-operate with appropriate authorities and technical organisations to ensure policies are updated and Standards reviewed to reflect best practice
- Undertake inspections, audits and review activities to ensure the Company's objectives for health, safety and welfare are being met.
- To provide a structure for the continuous improvement of our Health and Safety Management

System, which provides the framework for setting, reviewing and measuring health and safety objectives and targets.

The Board of Directors will give full backing to this policy and will support those who endeavour to carry it out.

Matt Brown	Managing Director and CFO	
Mike Ramsden	Support Services Director	

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4.2 Appendix 2

ENVIRONMENTAL POLICY

As one of the UK’s leading building controls sales and service providers with clients throughout Europe, E.ON Control Solutions Ltd are committed to helping public sector, retail, commercial and industrial organisations use less energy through innovation and partnerships. This is done primarily by the install, maintenance and management of BeMS.

This will be achieved by unlocking the value of energy management for our clients by reducing real time demand for energy, improving energy efficiency and delivering sustainable energy savings.

To assist with this, E.ON Control Solutions have implemented an Environmental Management System that meets the requirements of the ISO14001:2015 standards.

Protection of the environment in which we live and operate is a key part of E.ON Control Solutions Limited values and principles and we consider it to be sound business practice. Care for the environment and the quality of our services are key to the way we do business. The senior leadership team at E.ON Control Solutions are therefore committed to:

- Ensuring the company complies with appropriate legislation and regulations, and other requirements to which E.ON Control Solutions subscribes
- Identifying and evaluating any environmental effects associated with its activities in order to control and reduce any environmental impact, including the prevention of pollution
- Ensuring the responsible use of natural resources and the minimisation of waste and energy consumption
- Implementing the training of employees to ensure that they are environmentally aware and that neither they, the community, nor the environment are exposed to harm as a result of E.ON Control Solutions Limited operations
- Setting SMART objectives around the reduction of carbon emissions for the business

Environmental objectives will be set and reviewed through the management review process. E.ON Control Solutions Limited aims to meet the needs and expectations of clients, as well as statutory and regulatory requirements.

We will communicate this policy to all of the third-party contractors or suppliers undertaking work on our behalf. We will expect anyone representing E.ON Control Solutions from our Supply Chain to comply with our management system policies and procedures. A copy of this quality policy is also on E.ON Control Solutions Limited company intranet and website in order to communicate effectively with other internal and external parties.



Signed:

Mr. Matt Brown, Managing Director

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4.3 Appendix 3

QUALITY POLICY

As one of the UK’s leading building controls sales and service providers with clients throughout Europe, E.ON Control Solutions Limited are committed to helping public sector, retail, commercial and industrial organisations use less energy through innovation and partnerships. This is done primarily by the install, maintenance and management of BeMS.

This will be achieved by unlocking the value of energy management for our clients by reducing real time demand for energy, improving energy efficiency and delivering sustainable energy savings.

To assist with this, E.ON Control Solutions have implemented a Quality Management System that meets the requirements of ISO 9001:2015 standards.

E.ON Control Solutions Limited’s senior leadership team are committed to continually improving our Quality Management System by addressing the risks and opportunities that can affect conformity of our products and services, as well as focusing on enhancing customer satisfaction.

E.ON Control Solutions Limited aims to meet the needs and expectations of clients, as well as statutory and regulatory requirements.

Quality objectives will be set and reviewed through the management review process. Training is provided to promote awareness of individual responsibilities within the quality management system. All personnel within E.ON Control Solutions Limited are responsible for the quality of their work, ensuring ownership and accountability for all of our processes at the point of use.

We will communicate this policy to all of the third-party contractors or suppliers undertaking work on our behalf. We will expect anyone representing E.ON Control Solutions from our Supply Chain to comply with our management system policies and procedures. A copy of this quality policy is also on E.ON Control Solutions Limited company intranet and website in order to communicate effectively with other internal and external parties.



Signed:
Mr. Matt Brown, Managing Director

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4.4 Appendix 4

ENERGY POLICY

As a leading provider of Building Energy Management Systems (BEMS) in the UK and Europe, E.ON Control Solutions Limited (ECS) are committed to helping commercial, public, IT, residential leisure & hospitality, retail and pharmaceutical sectors use less energy via our services whether it's designing and installing small to major projects, site support services, energy management solutions and or data analytics. Our control systems are designed to identify and eliminate inefficiencies in building performance to improve sustainability by reducing CO₂, reduce energy costs and minimise operational expenditure.


ECS are committed to continuously improve the performance of our energy management system with an aim to reduce the use of energy and improving how we monitor and manage our energy use. To achieve these goals, we will adopt the following best practices:

- Develop and maintain an Energy Management System that meets the requirements of the ISO 50001 standards
- Uphold legal and other requirements regarding energy use, consumption and efficiency and our responsibilities as a good corporate citizen
- Ensure energy efficiency considerations are included in all aspects of our business plan whilst being consistent with business management practices
- Implementing the training of employees to ensure that they are aware of and adopt energy saving opportunities and that neither they, the community, nor the environment are exposed to harm as a result of our operations
- Create SMART objectives around the reduction of carbon emissions by our business activities
- Reduce energy usage
- Support the purchase of energy efficient products and services
- Implement energy performance improvements in our designs
- Implement monitoring and reporting procedures
- Communicate our performance with internal and external parties
- Encourage anyone representing ECS, internally and externally, to comply with our Energy Management System policies and procedures
- To ensure the necessary resource and information is available to achieve all objectives and targets

Our 2023 objectives and targets:

- In the period from 2020-2023, we aimed to reduce our business's carbon footprint by shifting our fleet of vehicles from being traditional petrol/diesel vehicles towards full EV and ULEVs. Our challenge by the end of 2023 was to have 65% of our vehicles as full EV and a further 25% ULEV. In the end we hit 61% for EV and 30% for ULEV. We will set new objectives in the first half to 2024 to continue this improvement.
- When refurbishment works takes place in any of our offices, we will always look to install the most energy efficient lighting, HVAC systems

Copies of this policy are available on our website and company intranet.

Signed: 

Mr. Matt Brown, Managing Director
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4.5 Appendix 5

SLAVERY & HUMAN TRAFFICKING STATEMENT, JUNE 2023

E.ON's Statement

This statement is made by E.ON SE as the ultimate holding company of the E.ON Group ("E.ON")¹, pursuant to section 54(6) of the UK's Modern Slavery Act 2015 (the "Act") for the financial year ending on 31 December 2022.

E.ON's Structure, Business & Supply Chain

E.ON is an international energy company which is focused on energy networks and customer solutions.

Global trends like sustainability and climate protection, digitalisation and technological innovation are altering the energy landscape. E.ON's core businesses reflect this: the transformation of yesterday's power lines into tomorrow's smart energy networks and the increasing demand for innovative customer solutions.

Value-enhancing procurement of goods and services is an important requirement for the success of E.ON's business. In all E.ON's procurement processes, E.ON requires human rights to be respected and environmental standards to be maintained throughout the entire supply chain. To this end, E.ON has various policies and management processes in place.

E.ON's Approach in Outline

E.ON has a commitment to act ethically and responsibly in all its business relationships and has zero tolerance of slavery and human trafficking in any part of its business or supply chain.

E.ON supports and is committed to upholding the UN Guiding Principles on Business and Human Rights and the core labour standards set out by the International Labour Organisation. E.ON has a wide range of internal policies, standards and processes in place groupwide to assist in tackling slavery and human trafficking, including:

1. E.ON Code of Conduct and E.ON's Human Rights Policy Statement;
2. E.ON Supplier Code of Conduct, with standards regarding human rights, working conditions, environmental protection and ethical business practices that E.ON requires its suppliers to meet;
3. 3. General Purchasing Conditions for suppliers to require compliance with the E.ON Supplier Code of Conduct;
4. Defined and monitored onboarding and qualification processes of new suppliers before E.ON engages in business with them;
5. Frequent evaluations of E.ON's top suppliers against key performance indicators;
6. Whistleblowing hotline to enable employees and third parties to report possible violations of the law or of company guidelines or policies.
7. Introduction of the German Supply Chain Due Diligence Act¹ has required a lot of elements to be enhanced and updated.

For further information about E.ON's responsible business practices please refer to the chapter "Human Rights and Supply Chain Management" in E.ON's Integrated Annual Report.

E.ON's Achievements with update for 2022

E.ON recognises the benefits of upholding standards and continually improving supply chain performance through successful collaboration as follows:

1. E.ON Human Rights Policy Statement is signed by all Management Board members and published on E.ON's website. The statement acknowledges the International Bill of Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO) and its fundamental conventions, and refers to E.ON policies, such as the E.ON Supplier Code of Conduct. E.ON's environmental, social and governance standards are based on the ten principles of the United Nations Global Compact (UN GC), the world's largest initiative for responsible corporate governance, which includes respecting human rights. E.ON continues to refine its approach to human rights and supplier management and introduced in 2021 a new annual mandatory training module on human rights cyber security and data protection. The module was refreshed and compliance was added to the training. It was issued to all employees in 2022. By the end of 2022, over 80% of employees had completed the training.
2. In 2022, E.ON continued to focus on monitoring existing and new suppliers to ensure that they complied with E.ON's minimum requirements and that potential risks to health, safety, the environment and corporate social responsibility, including the protection of human rights, were identified and mitigated. This was facilitated by the adoption of a fully digital supplier onboarding solution at the end of 2018, which was integrated into E.ON's enterprise resource planning (ERP) system. This means that every non-fuel supplier must complete this onboarding process if the individual transaction volume exceeds €25,000 (per event and per spend category) or the health, safety and environment risk is medium or high. This process (among other requirements) requires the suppliers to pass a compliance check and accept E.ON's Supplier Code of Conduct. By the end of 2022, the suppliers involved in 98.3% of the non-fuel purchase orders and call-off contracts at all E.ON Group companies had completed the onboarding process.
3. Following a comprehensive assessment conducted in 2018, E.ON continued to evaluate its suppliers' performance and, based on the findings, make decisions about its future relationship with them. Key non-fuel suppliers are determined annually, based on E.ON's annual spend with them and their criticality to E.ON's business. They are then periodically evaluated using five key performance indicators (KPIs): quality, commercial, delivery, processes and innovation, and corporate social responsibility (which includes the protection of human rights). In 2022 E.ON continued to carry out such reviews.

Enabled by periodic risk assessments a new KPI focusing on violations or suspected violations was added to reporting of the supply chain organisation at the start of 2020. "Suppliers under investigation/observation" shows the suppliers we are monitoring more closely. In such cases, the supply chain Compliance Officer and the respective supply chain Director are notified, and a process is set in motion to ensure that the situation is rectified without delay. If it is not, we terminate our business dealings with the supplier. In 2022, no business dealings were terminated because no compliance violations were detected.

E.ON conducted a rigorous benchmarking and human rights risk assessment encompassing the top 80 per cent of its current and anticipated spend and in all purchasing categories. In 2020, the supply chain organisation designed a systematic process for rolling out the risk matrix developed in 2019. The purpose of the matrix, which breaks down risks by country and purchasing category, is to mitigate any potential risk of human rights violations. In 2021 E.ON implemented its human rights due diligence process. It consists of a human rights risk matrix that was developed with human right experts and this is updated annually. In 2022 E.ON introduced a digital tool for ongoing risk

assessments of suppliers with medium and high human right risks. They are assessed in a variety of categories, including sustainability, finance, cybersecurity, supply chain disruption, and compliance. The programme specifically gathers and evaluates information on risks relevant to the German Supply Chain Due Diligence Act. It looks at several elements called points of interests such as the holding company of suppliers, plant locations and logistics routes.

In 2022, four alleged violations of human rights were reported through the Group wide whistle blower hotline. The investigations found that in each case the allegations were unfounded and therefore not a violation of human rights nor E.ON's Code of Conduct.

E.ON launched a Group-wide human rights due diligence project in 2022 to prepare the company for the requirements of Germany's Supply Chain Due Diligence Act. The project was led by the Group's Sustainability department with Representatives from Supply Chain, Human Resources, Compliance, Health and Safety and Environment departments being closely involved. As part of the project E.ON developed a Group wide approach to human rights management.

E.ON continued to provide training to both its new and existing supply chain employees with the aim of enhancing knowledge of all sustainability issues, including social welfare and human rights topics.

Plans for 2023

Activities proposed for 2023 include:

- Conducting the annual mandatory e-learning compliance, human rights and cyber and data security for all employees;
- Implementing the measures required under the German Supply Chain Due Diligence Act including:-
 - a new concept for conducting risk analysis of human rights risks relating to E.ON's activities within its own business implementing improved human rights risk matrix within its supply chain
 - updating the Supplier's Code of
 - Conduct and updating the Human Rights Policy Statement.

Health, safety and environment events will continue to be conducted throughout 2023 for E.ON employees and contractor representatives. The aim of these events is to reinforce awareness of the importance of these topics to E.ON, both generally and for individual projects, as well as to design specific action plans for joint improvement initiatives related to the products and services a particular contractor or subcontractor provides. The events also serve as a forum for sharing best practice and communicating E.ON's standards and policies.

E.ON's Continued Commitment

E.ON will continue to review its policies and processes in relation to the prevention of modern slavery and human trafficking in its business and supply chain, strengthening these where necessary to ensure continued alignment with the Act.

E.ON will also continue to train all employees on, and ensure compliance with, its Code of Conduct and will identify additional training needs where necessary.

This statement has been approved by the E.ON SE Board of Directors on behalf of E.ON on June 7, 2023.

A new statement will be published each year on the website.

Dr. Ing. Leonhard Birnbaum Chief Executive Officer, E.ON SE June 7, 2023

¹ Which includes the following E.ON companies qualifying under the criteria of the UK Modern Slavery Act 2015:

E.ON Energy Solutions Limited E.ON UK Energy Markets Limited E.ON UK CHP Limited
E.ON Control Solutions Limited E.ON UK Steven's Croft Limited E.ON Next Energy Limited
E.ON UK Infrastructure Services Limited Npower Limited
Npower Commercial Gas Limited Npower Group Limited

To view E.ON's previous statements please [click here](#)