

Health And Safety Policy Statement



1.0 Purpose

Define the position of Ultima Topco Limited and its subsidiaries ('Ultima Group', the 'Company') in relation to Health and Safety.

2.0 Scope

Ultima Group's business operation in the delivery of services, software and goods to its customer base.

3.0 Responsibilities

- The **Board** is responsible for the policy and procedures and shall provide staff with education and training to support adherence to this Policy.
- The **Board** shall be responsible for approving this Policy and Ultima Business Solutions Limited's ('Ultima') **Head of Legal and Compliance** shall be responsible for maintaining this Policy along with relevant staff in the Ultima Group.
- The **Head of People and Talent** shall be responsible for implementing and communicating this Policy to Ultima and to relevant Ultima Group managers who shall be responsible for onward dissemination to the remainder of the Ultima Group.
- The **Head of Legal and Compliance** shall be responsible for communicating this Policy to interested parties.
- Ultima Group shall have in place processes and procedures to support this policy and shall supervise compliance.
- The **Heads of Department** in conjunction with the **People and Talent Team** shall maintain the framework that illustrates the training objectives of the business, and the training needs of staff.
- **All staff** are responsible for maintaining awareness of Ultima Group's policies and procedures applicable to their role and for complying with them. This policy shall be applicable to all staff. **All staff** shall also maintain awareness of the policies set out in the frameworks of Compliance streams implemented by Ultima Group.

4.0 Policy

In accordance with its duty under Section 2 (3) of the Health and Safety at Work etc. Act 1974, and in fulfilling its obligations to employees, visitors, neighbours, contractors and the general public who may be affected by its activities, Ultima Group has produced the following statement of policy in respect of health, safety and welfare concerns.

It is our policy to comply with the following regulations:

Legislation relating to this policy

The Health and Safety at Work Act 1974

The Regulatory Reform (Fire Safety) Order 2005

The Fire Safety Act 2021

The Reporting of Injuries, Disease and Dangerous Occurrences Regulation 2013

The Health and Safety Welfare Regulations 1992

The Lifting Equipment and Lifting Operations Regulations 2005

The Management of Health and Safety at Work Regulations 1999

The Electricity at Work Regulations 1989

The Provision and Use of Work Equipment Regulations 1998

The Control of Substances Hazardous to Health Regulations as amended 2002

The Personal Protective Equipment Regulations as amended 2022

The Display Screen Equipment Regulations 1992

The Manual Handling Operations Regulations 1992

The Environmental Protection Act 1990

The Control of Asbestos at Work Regulations 2012

Ultima Group's Statement:

- It is the policy of Ultima Group to comply with the terms of the Health and Safety at Work etc. Act 1974, subsequent legislation and to provide and maintain a healthy and safe working environment. The health and safety objective of the Company is to minimise the number of instances of occupational accidents and illnesses and ultimately achieve an accident-free workplace.
- All employees will be provided with such equipment, information, training and supervision as is necessary to implement the policy and achieve the above stated objective.
- The Company recognises and accepts the duty to protect the health and safety of all visitors to its premises, including contractors and temporary workers, as well as any members of the public who might be affected by our operations.
- While the management of the Company will do all that is within its powers to ensure the health and safety of its employees, it is recognised that health and safety at work is the responsibility of each and every individual associated with the Company. It is the duty of each employee to take reasonable care of their own and other people's welfare and to report any situation which may pose a threat to the well-being of any other person.
- The management of the Company will provide every employee with the training necessary to carry out their tasks safely. However, if an employee is unsure how to perform a certain task or feels it would be dangerous to perform a specific job then it is the employee's duty to report this to their supervisor or the person responsible for health and safety. An effective health and safety programme requires continuous communication between workers at all levels. It is therefore every worker's responsibility to report immediately any situation which could jeopardise the wellbeing of himself or herself or any other person.
- The Company will make available such finances and resources as are deemed reasonable to implement this policy.
- All injuries, however small, sustained by a person at work must be reported to your line manager and the HR department. Accident records are crucial to the effective monitoring and revision of the policy and must therefore be accurate and comprehensive.
- The Company recognises the civil and moral need to ensure that all employees adhere to this Health and Safety Policy and will be prepared to invoke the disciplinary procedure in case of any deliberate disregard for the Health and Safety Policy.
- The Company's Health and Safety Policy will be continually monitored and updated, particularly when changes in the scale and nature of our operations occur. The Policy will be updated at least every 12 months.
- The specific arrangements for the implementation of the Policy and the personnel responsible are further detailed in the Health and Safety Policy and Arrangements document.

Each Manager has a responsibility for the implementation of this Health and Safety policy, arrangements, and associated procedures on a day-to-day basis.

Team members/sub-contractors are reminded of the legal requirement to comply with the Company's policy, arrangements, and associated procedures.

In particular, they are required: -

- To take reasonable care for their own health and safety at work and of those who may be affected by their acts or omissions.
- To co-operate with their employer to ensure that they comply with any duty or requirement for health and safety, imposed upon their employer by law, and contained in this statement or the Company's policy, arrangements or associated procedures.
- Not to intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare.

Executive Approval


Tamsin Ashmore, Chief Finance Officer

Feb 27, 2024
Date

5.0 Reporting Incidents

All staff are responsible for reporting incidents, events, weaknesses, or concerns. Incidents, including breaches of this Policy, shall be reported by the fastest possible and most appropriate means initially in line with the relevant local Management System by an email to Incidents@Ultima.com or Infosec@justaftermidnight.io as appropriate. Incidents or concerns may also be reported in confidence. Failure to report an incident may be considered a breach of this Policy.

6.0 Consequences of Non-Compliance

Any breaches of this Policy and supporting policies may be subject to a formal investigation. Where proven, failure to comply shall result in disciplinary action being taken against individuals determined to be responsible for the breach under Ultima Group's local Disciplinary Process, up to and including summary dismissal for gross misconduct. Ultima Group may also initiate legal action or refer the breach to relevant law enforcement authorities where warranted. Non-compliance by contracted third parties or their employees may result in termination of the supplier's contract and/or legal action.

7.0 Audit

Audit spot checks and automated monitoring may be conducted to ensure this Policy is complied with. Any non-compliance shall be reported to the Board in the first instance to initiate investigation of any incident. Reports of the findings, initial remediation steps and follow up actions taken, as well as recommendations for improvements, shall be reported to the Board.

8.0 Information Classification

This policy is defined as a public document.

9.0 Review and Maintenance

This *Corporate 017PO* shall be reviewed annually, or after significant change to ensure it remains effective and fit for purpose.

10.0 Exceptions

Where an Ultima Group policy requirement cannot be met for any reason, a formal request for exception shall be submitted in writing via the local Ultima Group compliance team for approval by the Board. Failure to obtain an exception approval will be considered a breach of this Policy.

11.0 Awareness training

Ultima Group will maintain an awareness training programme which shall be applicable for all staff. Some components of the awareness training will be communicated at the outset of employment with other components being included on an annual or *ad hoc* basis as a means to remind staff of statutory obligations, compliance requirements and to set expectations concerning conduct and business ethics.

12.0 Related Documents

- Health and Safety Policy and Arrangements document
- HR policies
- Corporate Compliance Policy
- Environmental & Social Governance Policy

13.0 Document Control

13.1 Authority

Signatory	Name	Role	Organisation
Author	Jennifer Hall	Head of Legal and Compliance	Ultima
Owner	Jennifer Hall	Head of Legal and Compliance	Ultima
Executive Sponsor	Tamsin Ashmore	CFO	Ultima

13.2 Identity

Issue Type	Released
Date Issued	27/02/2024
Version	3.3
Title	Health And Safety Policy - Corporate 017PO

13.3 Revision History

Version	Date	Status	Comment
1.0	01/06/2019	Released	New document provided by Competent Person
2.0	01/01/2020	Revised	Policy review
3.0	01/07/2020	Revised	Policy review
3.1	12/07/2021	Revised	Policy review
3.2	03/08/2022	Revised	Update of team names
3.3	27/02/2024	Revised	Inclusion of group into statement



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