



GLOBAL HEALTH, SAFETY & ENVIRONMENTAL POLICY
HSE POLICY

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Applies Globally: Subject to applicable local mandatory law

1. POLICY STATEMENT

Engineering Projects TM LTD ("EPTM LTD") is committed to conducting its architectural, engineering, design, consultancy and project-management activities responsibly, professionally and with appropriate regard for:

- health;
- safety;
- environmental protection;
- public safety;
- worker safety;
- client safety;
- technical integrity;
- risk reduction;
- sustainable development.

EPTM LTD seeks to prevent work-related injury and ill health, reduce foreseeable risks, protect the environment, and promote continual improvement in HSE performance.

The Company recognises that effective HSE management is a shared responsibility and that appropriate HSE considerations shall be incorporated into relevant business, professional, technical and operational decisions.

2. PRINCIPAL HSE COMMITMENT

EPTM LTD seeks to identify foreseeable risks associated with its professional activities and to take reasonable and proportionate measures to reduce those risks.

The Company recognises that good engineering and design can contribute significantly to public safety.

HSE risks shall be considered proportionately at relevant stages of work, including planning, design, review, procurement, project administration, external-site attendance and completion.

Where reasonably practicable, risks shall be avoided or eliminated at source, reduced through appropriate controls, and monitored where residual risks remain.

HSE responsibilities shall be allocated according to the nature and circumstances of the activity, and personnel shall be expected to raise material HSE concerns without unreasonable delay.



3. UK LEGAL FRAMEWORK

The Policy is principally structured around applicable UK requirements, including, where relevant:

- Health and Safety at Work etc. Act 1974;
- applicable health and safety regulations;
- environmental legislation;
- building and fire–safety requirements;
- workplace safety requirements;
- applicable professional requirements.

Where EPTM LTD operates or provides services internationally, mandatory HSE and environmental requirements applicable to those activities will also be considered and followed.

Where applicable requirements differ from this Policy, impose additional requirements, or provide a higher mandatory standard, the applicable mandatory legal requirement shall prevail.

Nothing in this Policy is intended to exclude, restrict, waive or override any legal duty, liability, right or protection that cannot lawfully be excluded, restricted, waived or overridden.

4. PUBLIC SAFETY

EPTM LTD recognises that buildings and infrastructure can affect:

- occupants;
- workers;
- visitors;
- emergency responders;
- neighbouring communities;
- the wider public.

EPTM LTD therefore seeks to integrate safety considerations into its professional services.

Where public–safety risks are identified within the Company's scope, they shall be appropriately considered, communicated and escalated to the relevant responsible person or client where necessary.

EPTM LTD shall not knowingly disregard a material safety concern within its professional responsibilities.



5. TECHNICAL SAFETY SERVICES

Where offered as part of EPTM LTD's services or social–impact initiatives, EPTM LTD shall provide or facilitate safety–related technical work, including:

- seismic assessments and reports;
- wind–load assessments and reports;
- fire–safety technical reports;
- structural technical reviews;
- engineering technical reports;
- technical peer reviews;
- design peer reviews;
- constructability reviews;
- technical risk reviews;
- engineering calculations and verification;
- building–safety assessments.

Such work shall be undertaken only to the extent of the agreed scope, available information, professional competence, resources and applicable requirements.

6. SAFETY–RELATED TECHNICAL SUPPORT

As part of EPTM LTD's commitment to serving society, the Company shall provide selected safety–related technical reports, assessments or peer reviews without professional fees, subject to:

- scope;
- technical feasibility;
- available resources;
- information supplied;
- professional competence;
- applicable law;
- appropriate terms of engagement.

Such support does not constitute an unconditional guarantee that every request will be accepted or that every building or project can be certified as safe.

Safety–related technical work shall remain subject to appropriate professional judgement, review, documentation and limitations applicable to the particular assignment.

7. TECHNICAL INTEGRITY

EPTM LTD seeks to ensure that professional work is:

- undertaken competently;
- based on reasonably available information;
- appropriately documented;



- reviewed where appropriate;
- consistent with the agreed scope;
- subject to applicable standards and regulations.

Where errors, omissions, material uncertainties or safety concerns are identified, they shall be appropriately reviewed and, where necessary, corrected, escalated or communicated to the relevant responsible party.

Personnel shall not knowingly present incomplete, inaccurate or misleading technical information as though it were verified.

8. DESIGN SAFETY

Safety considerations shall be incorporated into:

- architecture;
- structural engineering;
- MEP engineering;
- facade engineering;
- interior design;
- building services;
- construction planning;
- project management;
- technical consultancy.

Where reasonably applicable, design and technical reviews shall consider foreseeable hazards, constructability, maintainability, emergency access, user safety and relevant lifecycle risks.

Design safety considerations remain subject to the agreed scope and professional responsibilities of EPTM LTD and other project participants.

9. FIRE SAFETY

Where within the agreed professional scope, EPTM LTD shall consider:

- fire strategy;
- fire-resistance considerations;
- escape;
- compartmentation;
- fire detection;
- fire protection;
- emergency access;
- relevant fire-safety requirements.

Fire-safety considerations shall be addressed in accordance with applicable requirements and the Company's agreed professional scope.



10. SEISMIC SAFETY

Where relevant, EPTM LTD shall consider:

- seismic hazard;
- structural response;
- seismic loading;
- structural configuration;
- applicable seismic codes;
- resilience considerations.

Where seismic conditions present material design or safety implications, relevant assumptions, limitations and technical considerations shall be appropriately documented within the applicable professional scope.

11. WIND SAFETY

Where relevant, EPTM LTD shall consider:

- wind loading;
- building exposure;
- facade effects;
- structural response;
- applicable wind standards;
- weather-related design risks.

Where relevant, weather-related risks shall also be considered in relation to external-site attendance and other activities undertaken by EPTM LTD personnel.

12. ENVIRONMENTAL RESPONSIBILITY

EPTM LTD seeks to support:

- energy efficiency;
- resource efficiency;
- low-carbon design;
- sustainable materials;
- reduced waste;
- responsible environmental design;
- building performance;
- environmental awareness.

EPTM LTD shall seek to prevent or minimise reasonably foreseeable adverse environmental impacts arising from its activities and shall comply with applicable environmental requirements.



Where proportionate to the Company's activities, environmental controls may include responsible resource use, waste reduction, appropriate disposal, pollution prevention and consideration of environmental impacts in relevant technical and business decisions.

Environmental performance and significant environmental risks shall be reviewed where appropriate to the nature and scale of the Company's activities.

13. CLIMATE RESILIENCE

Where relevant, EPTM LTD shall consider:

- extreme weather;
- overheating;
- flooding;
- wind;
- seismic events;
- climate-related risks;
- resilience of buildings and infrastructure.

Where climate-related risks are material to a professional assignment, appropriate resilience considerations shall be incorporated within the agreed scope and available technical information.

14. OFFICE-BASED PROFESSIONAL SERVICES

EPTM LTD's professional activities are principally office-based.

The Company recognises that office-based work can nevertheless involve health, safety and environmental risks, including ergonomic, electrical, fire, emergency, equipment, travel, workplace and psychosocial risks.

EPTM LTD shall seek to maintain appropriate workplace arrangements proportionate to its activities, including reasonable attention to:

- safe working conditions;
- emergency arrangements;
- fire safety;
- suitable work equipment;
- workstation and ergonomic considerations;
- access and housekeeping;
- electrical and other foreseeable workplace hazards;
- occupational-health considerations;
- reporting of hazards, incidents and concerns.

Where EPTM LTD personnel attend external sites, meetings, inspections or other locations, appropriate safety considerations should be applied to the circumstances.



External–site attendance shall be subject to the relevant client's, site controller's or responsible party's applicable requirements where appropriate, together with EPTM LTD's own reasonable risk considerations.

Where the Company has sufficient information and responsibility to do so, relevant external–site hazards shall be identified before or during attendance and appropriate controls, instructions or restrictions shall be applied.

EPTM LTD personnel shall not knowingly undertake activities presenting unreasonable or uncontrolled HSE risks.

15. CONTRACTORS AND THIRD PARTIES

Third parties engaged by EPTM LTD are expected to comply with applicable legal and contractual HSE requirements.

Where proportionate to the nature and risk of the engagement, EPTM LTD may assess a contractor or third party's relevant:

- competence and experience;
- HSE arrangements;
- qualifications or certifications;
- insurance and legal requirements;
- risk assessments and method statements where relevant;
- emergency arrangements;
- environmental controls;
- incident–reporting arrangements.

Contractors and third parties shall be expected to provide appropriate HSE information before undertaking higher–risk activities where reasonably required.

Material HSE requirements may be incorporated into contracts, purchase orders, scopes of work or other engagement documentation.

EPTM LTD may monitor material HSE performance, require corrective action, suspend relevant activities or reconsider an engagement where serious or persistent HSE non–compliance is identified, subject to applicable contractual and legal requirements.

16. INCIDENT REPORTING AND MANAGEMENT

Relevant health, safety or environmental incidents associated with EPTM LTD activities should be reported promptly.

This includes, where relevant:

- injuries or occupational ill health;
- dangerous occurrences;
- near misses;
- unsafe conditions;
- property or equipment damage;
- environmental incidents;



- fires or emergencies;
- significant external–site incidents;
- material HSE non–compliance.

Reported incidents shall be assessed proportionately according to actual or potential severity, including whether they involve serious injury, significant environmental impact, substantial property damage, repeated risk or potential regulatory consequences.

Where appropriate, the Company shall:

1. secure or contain the immediate risk;
2. provide or facilitate appropriate assistance;
3. preserve relevant evidence and information;
4. notify the appropriate responsible person;
5. determine whether escalation or external notification is required;
6. investigate the underlying and contributing causes;
7. identify corrective and preventive actions;
8. assign responsibility and reasonable target dates;
9. monitor actions to completion; and
10. record the incident, investigation, decisions and close–out where appropriate.

Serious or potentially serious incidents shall be escalated promptly and shall receive an investigation proportionate to their actual or potential consequences.

Where legally required, incidents shall be reported to the relevant authority within the applicable statutory timeframe.

Lessons learned from material incidents shall be communicated and incorporated into relevant risk assessments, procedures, training or technical practices where appropriate.

17. EMERGENCY RESPONSE

EPTM LTD shall maintain emergency arrangements proportionate to the nature of its principally office–based activities and foreseeable external–site involvement.

Depending on the circumstances, foreseeable emergency scenarios may include:

- fire;
- serious injury or medical emergency;
- hazardous release or environmental incident;
- severe weather;
- structural or building emergency;
- security threat;
- significant utility or electrical incident;
- serious external–site incident;
- other events presenting an immediate threat to people, property or the environment.

Emergency arrangements shall, where relevant, identify:



- immediate protective actions;
- responsible persons;
- emergency communication and escalation;
- emergency–service contact arrangements;
- evacuation or shelter requirements;
- assembly or safe–location arrangements where applicable;
- first–aid or medical assistance;
- site/client emergency procedures where attending external locations;
- incident recording and notification;
- recovery and return–to–normal arrangements.

Personnel shall follow applicable emergency instructions and shall not place themselves or others at unreasonable risk when responding to an emergency.

After a material emergency, EPTM LTD shall review the circumstances and implement reasonable corrective or preventive measures where appropriate.

18. OCCUPATIONAL HEALTH

EPTM LTD recognises that occupational health is an integral component of HSE management.

Given the Company's principally office–based activities, occupational–health arrangements shall be proportionate to foreseeable risks and may include consideration of:

- workstation and ergonomic risks;
- visual and screen–related work;
- manual–handling requirements;
- work–related stress and other relevant psychosocial risks;
- travel and external–site exposure;
- workplace environmental conditions;
- occupational exposure where applicable;
- reasonable adjustments and work restrictions where legally required or appropriate.

Where a particular activity presents a material occupational–health risk, EPTM LTD shall seek to identify the risk and implement proportionate controls.

Where specialist occupational–health advice, assessment or monitoring is reasonably required by the nature of an activity or applicable law, EPTM LTD shall seek appropriate arrangements.

Personal health information shall be handled confidentially and in accordance with applicable law.



19. HSE RISK ASSESSMENT AND OPERATIONAL CONTROL

EPTM LTD shall seek to identify and assess reasonably foreseeable HSE risks arising from its activities.

Risk assessments or equivalent documented assessments shall be undertaken where appropriate to the nature, scale and risk of the activity, particularly for:

- external–site attendance;
- higher–risk technical or operational activities;
- significant workplace hazards;
- environmental risks;
- emergency situations;
- material changes to activities;
- new equipment, systems or processes.

Risk controls shall be proportionate to the identified risks and may include avoidance, elimination, substitution, engineering controls, administrative controls, information, instruction, training and appropriate personal protective equipment.

Risk assessments shall be reviewed where circumstances materially change, following significant incidents or where experience indicates that existing controls may no longer be adequate.

20. HSE INSPECTION, AUDIT AND REVIEW

EPTM LTD shall use proportionate inspection, monitoring, audit and review arrangements appropriate to its principally office–based activities and the risks associated with its work.

Where appropriate:

- workplace and office HSE conditions shall be reviewed periodically;
- external–site HSE arrangements shall be reviewed when relevant to Company activities;
- contractor HSE performance may be reviewed according to risk;
- incident and near–miss trends shall be reviewed;
- environmental performance and significant environmental risks shall be reviewed;
- applicable legal and regulatory requirements shall be monitored;
- material HSE controls shall be periodically reviewed for continuing suitability.

The frequency and depth of inspections, audits and reviews shall be determined according to risk, changes in operations, incident history, legal requirements and available resources.

Significant findings shall be documented where appropriate, assigned to responsible persons and tracked through corrective action to reasonable close–out.



21. HSE OBJECTIVES, KPIs AND PERFORMANCE

EPTM LTD seeks continual improvement in HSE performance.

Where proportionate to the Company's activities, HSE performance may be monitored using indicators such as:

- reportable incidents;
- injuries and occupational ill health;
- near misses;
- significant hazards identified;
- corrective actions completed;
- overdue corrective actions;
- HSE inspections or reviews completed;
- relevant training or awareness activities completed;
- contractor HSE performance;
- environmental incidents;
- waste or resource—efficiency indicators where measurable;
- significant compliance findings.

HSE objectives and targets may be established or revised according to the Company's activities, identified risks, legal requirements, available resources and performance trends.

Material HSE performance information may be reviewed periodically by appropriate Company management and used to identify corrective action and improvement priorities.

22. ENVIRONMENTAL MANAGEMENT AND COMPLIANCE

EPTM LTD's environmental management shall be proportionate to the nature and scale of its activities.

Where relevant, the Company shall seek to:

- identify significant environmental aspects and risks;
- comply with applicable environmental requirements;
- prevent pollution and minimise avoidable environmental impacts;
- reduce unnecessary resource consumption;
- reduce waste and encourage responsible disposal;
- consider environmental performance in relevant procurement and technical decisions;
- monitor significant environmental issues where reasonably practicable;
- investigate material environmental incidents;
- implement corrective action where appropriate.

Where environmental requirements apply to a particular project or client assignment, those requirements shall be considered within the Company's agreed scope and contractual responsibilities.



23. TRAINING, COMPETENCE AND AWARENESS

EPTM LTD seeks to ensure that persons undertaking relevant activities have appropriate competence, information, instruction or training proportionate to their responsibilities and risks.

HSE awareness may include:

- workplace safety;
- emergency arrangements;
- incident reporting;
- external–site safety;
- environmental responsibilities;
- relevant technical safety requirements;
- applicable legal or client requirements.

Where specific competence, certification or specialist training is required for an activity, EPTM LTD shall seek to ensure that appropriately competent persons undertake or supervise the relevant work.

24. COMMUNICATION AND CONSULTATION

EPTM LTD encourages personnel and relevant third parties to raise HSE concerns, hazards, incidents, near misses and improvement opportunities.

Material HSE information shall be communicated to relevant persons where reasonably necessary.

Where appropriate, HSE matters may be discussed through project meetings, technical reviews, management reviews, contractor communications, incident reviews or other suitable channels.

No person should knowingly suppress or conceal a material HSE concern or incident.

25. CONTINUOUS IMPROVEMENT

EPTM LTD seeks to improve HSE performance through:

- professional learning;
- technical review;
- risk assessment;
- lessons learned;
- updated standards;
- improved procedures.

Continuous improvement may also be supported through:

- incident and near–miss analysis;
- HSE inspections and audits;
- performance indicators;



- corrective and preventive actions;
- contractor and third-party reviews;
- employee and stakeholder feedback;
- changes in applicable law or professional standards;
- technological and operational improvements.

The Policy and relevant HSE arrangements shall be reviewed when material changes in the Company's activities, risks, legal requirements or operating circumstances occur and otherwise periodically as appropriate.

26. GLOBAL APPLICATION

UK law is the principal legal framework for this Policy.

Mandatory local HSE, environmental, building-safety, fire-safety and occupational-safety requirements prevail where applicable, in jurisdictions outside of the United Kingdom.

Nothing in this Policy is intended to reduce or replace a mandatory local requirement.

Where local requirements, client requirements or site-specific conditions impose additional HSE controls, EPTM LTD will comply with those requirements to the extent applicable to its responsibilities and scope.
