

ST. MODWEN PROPERTIES LIMITED

COVID-19 H&S MANAGEMENT POLICY

St. Modwen Properties Limited (“St. Modwen”) is committed to ensuring that the continual guidance and instruction from Government bodies and industry committees is adopted and implemented to the highest standard across all our operations. This commitment to put people’s health and safety first, before anything else, is embedded into our Values. We will co-operate wherever appropriate with contractors, customers and other third parties to pursue our policy of safe working during and beyond the COVID-19 restrictions. We will actively monitor and review processes, to achieve continual improvement in our working practices during these restrictions to ensure the management of health and safety. This applies to the communities we serve, where people live and work, as well as our offices and sites.

Our commitments:

- We are committed to adopting and complying with all instructions issued by Government bodies in the areas that we operate.
- We will continually engage with industry bodies, our supply chain partners and other operators in our sector to obtain, share and implement good working practices under COVID-19 restrictions.
- We will provide the IT hardware, software and other equipment to allow our employees to safely carry out their duties both in their home environment and in their place of work.
- We will provide adequate and suitable information, advice, instruction, and training for all our employees to ensure they are aware of the control measures and procedures put into place by St. Modwen for safe working.
- We will obtain and review all our contractors’ procedures for working under COVID-19 restrictions and ensure they are suitable and sufficient, in accordance with Government instructions and advice, prior to work on site commencing.
- We will ensure our prospective tenants or homeowners remain safe whilst viewing our premises.
- We will continue to engage with our people to keep them briefed on the current arrangements and operational updates within St. Modwen.
- We recognise the potential strains on mental health that this uncertain period will have for our people. We are committed to ensuring that all line managers have regular contact with their team members to provide not only updates but to ‘check-in’ with them. Where any additional support is required for any employee, this will be identified, and support will be provided in collaboration with our line managers and HR representatives.
- We will ensure that any potential or confirmed employee cases of COVID-19, whether it be themselves or somebody in their household, is reported to line management and HR and that self-isolation (as per Government guidelines) is adopted.
- We will request that our supply chain partners communicate any suspected or confirmed cases of COVID-19 to us and take any necessary measures to protect others that may have come into contact with them.
- We will ensure effective and timely consultation with employees on proposed changes to this COVID-19 management policy and will undertake a quarterly review of this policy and revise where necessary.
- We will make this policy available to relevant interested external third parties, as appropriate.



Sarwjit Sambhi CEO

COVID-19 H&S Management Policy	DOC REF:	HS-GRP-POL-003	AUTHOR(S):	B Watts, S Holloway, A Holden & A Khaira
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2. Risk Management Arrangements within St. Modwen:

The following tables outline the actions taken across the Group's activities to manage the Health and Safety risk to anyone affected by our operations. These actions are based on various risk assessments.

BUSINESS UNIT / FUNCTION	KEY RISKS COVID19	ACTIONS TAKEN/CONTROLS
Group Offices	<ul style="list-style-type: none"> ▪ Potential for COVID-19 cases due to lack of social distancing ▪ Inadequate cleaning and hygiene protocols ▪ Overcrowding of offices increasing the risk ▪ Travelling to work ▪ Risk to mental health and wellbeing ▪ RIDDOR reporting ▪ HSE enforcement ▪ Breach of COVID-19 legislation ▪ Mental health and wellbeing ▪ Emergency management 	<ul style="list-style-type: none"> ▪ Risk assessments for new ways of operating ▪ Specific COVID-19 H&S management plans developed for each office ▪ Return to Work Working Group established ▪ Phased approach being planned increasing capacity as per Government guidance ▪ Reinduction for all colleagues ▪ Screens at reception and available should an employee request one around desks ▪ Use of face coverings mandated when using lifts ▪ Enhanced cleaning regimes to be continued ▪ Training and awareness for all colleagues on changing requirements ▪ Access to Employee Assistance Programme and Mental Health First Aid ▪ Review of fire safety and first aid protocols ▪ Addition of thermographic screening cameras at office entrances
Logistics / Strategic Land and Regeneration: Construction activity	<ul style="list-style-type: none"> ▪ Health risk to employees on contractors' sites ▪ Lack of social distancing ▪ Inadequate cleaning and hygiene protocols ▪ Potential for COVID-19 cases ▪ Loss of focus on other H&S risks ▪ Risk to mental health and wellbeing ▪ Security of sites during pause phase 	<ul style="list-style-type: none"> ▪ H&S team has reviewed all contractor arrangements for the management of COVID-19 risk and compliance to HSE/PHE/CLC requirements ▪ Written communication to contractors on St. Modwen requirements ▪ All contractor sites to be visited and assessed by H&S team to check compliance

BUSINESS UNIT / FUNCTION	KEY RISKS COVID19	ACTIONS TAKEN/CONTROLS
Logistics / Strategic Land and Regeneration: Property management activity	<ul style="list-style-type: none"> ▪ Health risk to employees ▪ Health risk to tenants on managed sites ▪ Potential risk to the public ▪ Lack of social distancing ▪ Inadequate cleaning and hygiene protocols ▪ Loss of focus on other H&S risks ▪ Security of assets/property ▪ Property related plant and equipment not being inspected due to lockdown restrictions ▪ Lone working for employees ▪ Mental health and wellbeing 	<ul style="list-style-type: none"> ▪ Risk assessments developed ▪ Contingency plans updated for all managed sites and assets ▪ Return to work plans developed for all tenanted and serviced premises ▪ Strategies developed to manage high volume public properties, i.e. retail, Trentham Gardens – in conjunction with the H&S team. ▪ Inspections and checks of compliance on properties and assets including plant and equipment (Legionella risk, lifts etc.) ▪ Access to Employee Assistance Programme and Mental Health First Aid ▪ Review of fire safety, emergency and first aid protocols
St. Modwen Homes: Sites	<ul style="list-style-type: none"> ▪ Health risk to workforce and our employees on sites ▪ Lack of social distancing ▪ Travelling to site ▪ The need for proximity working for certain tasks ▪ Inadequate cleaning and hygiene protocols ▪ Potential for COVID-19 cases ▪ RIDDOR reportable ▪ HSE Enforcement ▪ Loss of focus on other H&S risks ▪ Security of sites during lockdown ▪ Risk to mental health and wellbeing 	<ul style="list-style-type: none"> ▪ Risk assessment for new ways of operating developed ▪ Operating procedures and visual standards developed in line with CLC guidance ▪ Updated CP plans and site documentation ▪ Written communications to all employees and sub-contractors ▪ Training/briefing awareness and toolbox talks ▪ Online H&S induction to replace face to face – 10 Golden Rules ▪ Use of face coverings encouraged when in close proximity to others ▪ Enhanced cleaning regimes ▪ One person per room rule when working ▪ COVID-19 compliance assessed as part of six weekly site inspections ▪ Review of contractor arrangements ▪ Access to Employee Assistance Programme and Mental Health First Aid ▪ Review of fire safety and first aid protocols
St. Modwen Homes: Sales and Customer Service	<ul style="list-style-type: none"> ▪ Risk to customers ▪ Health risk to workforce and our employees on sites ▪ Lack of Social distancing ▪ Travelling to site ▪ Working in occupied Homes ▪ Risk to mental health and wellbeing 	<ul style="list-style-type: none"> ▪ Risk assessment for new ways of operating ▪ Operating procedures and standards developed in line with BRC/PHE guidance ▪ Updated Sales H&S Plans and site documentation ▪ Protocols developed for operation of show home and use of marketing suites to promote and protect the health of colleagues and customers ▪ Use of face coverings encouraged when in close proximity to others ▪ Written communication/briefing to all colleagues ▪ Health question set for customers visiting site

BUSINESS UNIT / FUNCTION	KEY RISKS COVID ₁₉	ACTIONS TAKEN/CONTROLS
		<p>by appointment</p> <ul style="list-style-type: none"> ▪ 10-point plan for working in occupied homes ▪ Physical distancing at all times within viewing ▪ Enhanced cleaning/sanitiser in sales complex ▪ Provision of additional PPE for teams and customers where necessary ▪ SoloProtect lone worker device deployed for sales teams to assist with changes to working hours ▪ Access to Employee Assistance Programme and Mental Health First Aid ▪ Review of fire safety and first aid protocols