

### Health and Safety Policy Manual

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### 1. Health & Safety Policy Statement

It is the policy of Robert Walters plc and its subsidiaries (“Robert Walters”) to ensure, so far as it is reasonably practical, the health, safety and welfare at work of all its employees, contractors and visitors, in accordance with the relevant statutory requirements and corporate best practice.

Robert Walters also accept its responsibility for the health and safety of other people who may be affected by its activities. Consideration is given to ensure suppliers and contractors’ provision for safety is compatible with that of Robert Walters.

It is Robert Walters’ belief that the most effective prevention of injury is the awareness and commitment of employees at every level. In particular, Robert Walters shall:

- Provide and maintain equipment and places of work that are safe and without risk to health.
- Provide as necessary, information, instruction, training and supervision that is required to ensure health and safety at work of its employees.
- Encourage staff to set high standards of safety and to foster an attitude of mind which accepts good safety practice as normal.

In pursuance of this policy Robert Walters shall appoint or seek guidance of competent persons to advise the organisation on all matters relating to health, safety and welfare, and to oversee that this policy is implemented.

The objective of this health & safety statement can only be achieved through the support and cooperation of all staff. It is therefore the responsibility of all employees, to ensure that by their activities or behaviour, they do not knowingly create hazards for themselves or others.

To ensure this policy, and the way in which it operates, is kept up to date, it will be subject to an annual review.



**David Bower**  
Chief Financial Officer

## 2. Responsibilities

It is essential that the effective management of health and safety be recognised as an integral part of the overall management of Robert Walters. To this end, responsibilities have been allocated to all employees within Robert Walters.

### A. The Board Directors shall ensure that:

- A Safety Policy is in place that supports effective occupational health and safety arrangements.
- Adequate resources are made available to meet the requirements of the Safety Policy.
- All necessary statutory and regulatory records are available.
- Key staff are appointed in writing, to undertake specific duties to comply with the Safety Policy and other applicable requirements.

### B. The Director Responsible for Safety (CFO) shall:

- Maintain a broad understanding of the Safety Policy, related procedures, and those statutory requirements that may affect Robert Walters' activities.
- Ensure the Board of Directors are made aware of safety matters within Robert Walters.
- Provide guidance to the Board of Directors.
- Ensure a Competent Person is appointed as a Health & Safety Officer for Robert Walters.
- Authorise changes to the Health & Safety Policy Statement.
- Ensure information relating to Robert Walters' safety performance is collated for presentation to the Board.
- Ensure appropriate statutory and regulatory records relating to OH&S are maintained.
- Ensure employees receive induction training which includes health, safety and welfare information.

### C. Health & Safety Officer (Chief Technology & Transformation Officer) shall:

- Maintain a broad understanding of the Safety Policy related procedures, and those statutory requirements that may affect Robert Walters' activities.
- Ensure safety recommendations from inspections, audits and accident investigations are implemented so as to prevent a re-occurrence.
- Provide safety related information to the Board of Directors.
- Distribute resources necessary to satisfy occupational health & safety requirements.
- Engage a Competent Person as a focal point for liaison with enforcing authorities and other external bodies.

### D. The Appointed Safety Coordinator (or Local Representative) shall:

- Work with the Director Responsible for Safety to ensure that adequate resources can be provided to Robert Walters' core activities.
- Undertake location specific risk assessments and communicate or implement suitable control measures.
- Liaising with local staff representatives and landlords (where necessary) to verify suitable workplace arrangements have been implemented.
- Coordinate and supervise safety support under their control, gather feedback and identify trends.
- Advise on recommendations for the continuing development of this Safety Policy and participate in safety reviews as requested.
- Provide appropriate safety input during a tender process if required.
- When requested, provide appropriate safety input to the procurement process.

- Promote the provision of adequate resources to achieve the required health and safety performance.
- Ensure that accident and incident investigations are carried out to identify both immediate and underlying causes. Report on the findings and promote actions to prevent recurrence.
- Oversee the coordination of reportable injuries and diseases (RIDDOR).
- Ensure that Directors and Managers are aware of this Safety Policy and advise them in discharging their responsibilities for those who they have a duty of care.
- Inform Directors and Managers and others of existing and potential hazards to health and safety at work, and of the legal requirements relevant to their work.
- Distribute health and safety information.
- Monitor and report on working practices to ensure that they are in compliance with Robert Walters' Safety Policy and statutory requirements.
- Liaise with external organisations (eg insurance providers, 3<sup>rd</sup> party certification bodies etc.) on matters relating to occupational health & safety.
- Ensure staff receive suitable and sufficient training as is necessary to meet the arrangements of Robert Walters' Safety Policy.
- Appoint persons to assist in compliance with this Safety Policy (Fire Marshals, First Aiders, etc.)
- Ensure that a suitable office safety induction is delivered to new employees.
- Undertake audits or assessments of Robert Walters' workplaces, as requested.
- Ensure appropriate statutory and regulatory records are maintained.
- Ensure sub-contractors undertake their own risk assessments and provide copies.
- Manage safety aspects of sub-contractors under their control.

**Note:** The Local Representative and/or Local Management shall be expected to follow the principles of this manual and should view its content as best practice, while considering a practical approach to its implementation that fits with local legislation and local custom.

### **E. The Management Systems Facilitator:**

- Assist with the identification of applicable health & safety related legislation.
- Assist with undertaking office / work place risk assessments.
- Assist with the preparation of in-house policies, procedures and information documents.
- Monitor health, safety and welfare compliance through internal audit.
- Undertake regular reviews including OH&S performance statistics.

### **F. Operational Directors and Divisional Managers shall ensure that:**

- They understand this Safety Policy and related statutory requirements.
- The workplace(s) under their control are compliant with the arrangements in this Safety Policy.
- They manage the safety aspects of employees and visitors within their duty of care.
- Any safety recommendations from inspection, audits and accident investigations are implemented as to prevent a re-occurrence.
- Employees have received suitable and sufficient safety induction.

### **G. Principle Reception Staff shall ensure that:**

- Candidate and visitor health, safety and welfare requirements have been considered while on Robert Walters premises.
- Out of hours visitor have signed-in or made similar arrangements.
- Suitable first aid provision is readily available during normal working hours.
- They cooperate with the Safety Coordinator (or Local Representative) to achieve the aims of this Safety Policy and act on any recommendations that may have been made.

### **H. All Employees shall ensure that:**

- They understand this Safety Policy and the related arrangements.
- They take reasonable care for the safety of themselves and others who may be affected by their acts or omissions.
- They observe safe-working practices at all times.
- Any accidents, incidents, faults, defects, hazards or unsafe conditions are reported immediately.
- They do not interfere with equipment provided in the interest of health and safety.
- They follow instructions and comply with risk assessments that have been issued.
- They cooperate with their Directors and Managers on all matters regarding health, safety and welfare.

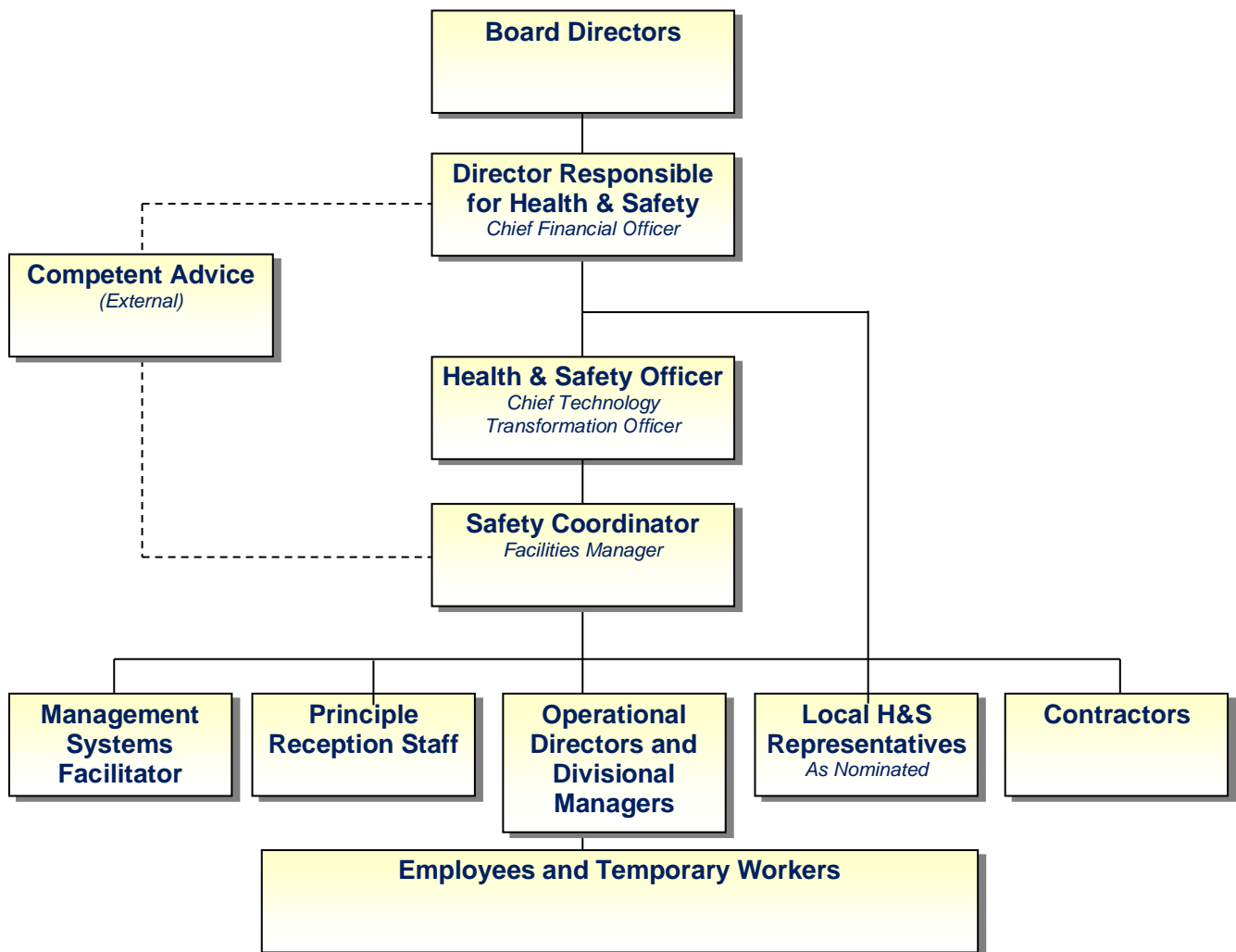
### **I. Temporary Workers (including Resource Solutions staff)**

Day-to-day responsibility for health & safety during a Temporary Worker's assignment will lie with the client to which they are assigned.

Temporary Workers contracted to work at client's sites will be responsible for familiarising themselves with the health & safety arrangements for the client they have been assigned to (including complying with the client's health & safety guidelines and systems) and take reasonable care for their own health & safety and that of others who may be affected by their acts or omissions.

In the event that the Temporary Worker has any questions or concerns regarding the client's safety arrangements, they should contact the relevant health & safety representative of the client. If the Temporary Worker feels that such questions or concerns have not been resolved to their satisfaction, then the Temporary Worker should contact a Safety Coordinator (or Local Representative) so that the issue can be discussed and investigated.

### 3. Organisation Chart



## 4. Arrangements

### 4.1 Competent Advice

It is Robert Walters policy to utilise the services of both in-house expertise and external health and safety support, as appropriate. Robert Walters shall determine competency as a person or company with sufficient knowledge, training and experience in health and safety matters relating to the Robert Walters' undertakings.

### 4.2 Records and Information

Information relating to health and safety matters shall be obtained through a variety of mediums including official websites, external advisors and professional bodies. The Safety Coordinator shall determine the means of disseminating relevant information.

Records referenced throughout this Safety Policy, shall be retained in line with Company Procedures and in accordance with data protection legislation. The Safety Coordinator shall be responsible for maintaining records which will contain key health and safety compliance documents.

### 4.3 Induction and Training

Employees shall receive formal Induction Training as near to the first day of employment as practical.

The persons employing or responsible for supervision of the new starter must also ensure that health, safety, and welfare information has been provided to the new starter either by formal Induction training or personal advice / instruction.

It is Robert Walters policy to ensure to ensure that the appointed Safety Coordinator has appropriate experience within occupational health & safety.

### 4.4 Consultation and Communication

Employees and contractors are actively encouraged to consult with the Company on any matters or concerns they may have relating to health and safety. This may be through their line manager or the appointed Safety Coordinator.

The Safety Coordinator may convene health and safety meetings when necessary or utilise an existing meeting for this purpose. The agenda of these meeting will be arranged in such a way as to promote feedback as well as disseminate information.

### 4.5 Supervision and Inspection

The Safety Coordinator shall determine when a task, such as an office move, requires supervision. Where contractors are engaged, they will be required to provide their own health and safety supervision regardless of Robert Walters' provision.

The Safety Coordinator shall ensure that Robert Walters' offices are periodically inspected by means of floor walk-throughs and that any unsatisfactory findings are actioned.

### 4.6 Monitoring, Measurement and Review

It is Robert Walters policy to monitor and review the Arrangements (Section 4) referenced within this Policy Manual. This will be done by analysing the finding from the floor walk-throughs and undertaking an annual internal compliance assessments.

Robert Walters shall endeavour not to solely rely on accident statistics as a measurement of health and safety performance, though these will be evaluated and reviewed.

It is Robert Walters policy to undertake internal audits to ensure on-going compliance with the Management System and these audits will also be used to monitor Health, Safety and Security operational controls.

The CFO shall review policy and performance on an annual basis, having access to the findings of the above.

### 4.7 Disputes

In the event of a dispute regarding health and safety matters, it should be reported to a Director for addressing, and if not successfully resolved, directed to the Health & Safety Officer or CFO in writing.

### 4.8 Discipline

Failure to comply with Robert Walters' Health & Safety Policy or contravention of statutory requirements, regulations or rules, will be disciplined in accordance with conditions of employment.

### 4.9 Risk Assessment and Control Hierarchy

It is Robert Walters policy to assess all aspects of its operations to determine significant risks. All significant risks shall be recorded and communicated to those who may be exposed to them.

Risk assessments shall be reviewed regularly to ensure that they remain suitable and sufficient with any changes being communicated to those affected. The Safety Coordinator shall ensure that activity specific risk assessments are maintained and controlled.

Contractors engaged by Robert Walters shall be expected to provide their own assessments, where appropriate.

The risk assessment process shall be used to identify adequate measures to control that risk and to develop a safe system of work that shall follow the expected hierarchy of:

- Avoiding risks
- Combating risks at source
- Adapting the work to the individual
- Adapting to technical progress
- Substitution of the dangerous for the less dangerous
- Giving collective protective measures priority over individual protection measures
- Giving appropriate instruction, information and training to employees

With particular reference to young persons and pregnant women, it is Robert Walters policy to take specific account of the vulnerability of these groups and to make assessment of the potential impact upon them to determine adequate controls.



All Directors and Managers are responsible for ensuring risk assessments are undertaken as applicable for matters under their direct control (see section 2). They shall also be responsible for ensuring that safe systems of work are implemented.

### **4.10 Control of Substances Hazardous to Health**

In an office environment, hazardous substances are generally restricted to cleaning products such as de-scaler, bleach, and some photocopier cartridges. Although risks from these materials are low, the regulations still apply. Avoid using products displaying Hazard Symbols (red and white pictograms). If you must use them, ensure you read the instructions fully and follow the stated precautions.

The Safety Coordinator should be contacted if additional guidance is required.

### **4.11 Asbestos**

The Robert Walters CFO shall ensure that an asbestos survey has been undertaken in respect of company premises and that a management programme is in place for any Asbestos Containing Materials identified. No work will take place to the fabric of the premises unless these documents have been evaluated in the first instance.

### **4.12 Welfare**

The Safety Coordinator (or Local Representative) shall ensure that suitable and sufficient welfare facilities are provided. Arrangement shall be made for the facilities to be regularly cleaned and maintained.

### **4.13 First aid**

The Safety Coordinator (or Local Representative) shall ensure that the number of qualified First Aiders is based upon a needs assessment and that a fully maintained first aid box is available within the office at all times.

The designated person shall be responsible for the maintenance of the first aid provision. Notices will be displayed to identify the first aid contacts.

### **4.14 Fire Safety**

The Safety Coordinator (or Local Representative) shall ensure that a Fire Risk Assessment (as required by Robert Walters' Fire Safety Policy) has been undertaken in respect of the premises where Robert Walters employees will be working.

The validity of each Fire Risk Assessment shall be reviewed annually or in light of any changes in legislation, employee numbers, or requirements that may affect the suitability of the assessment.

It is Robert Walters policy that smoking is strictly prohibited in all places of work, including vehicles.

### **4.15 Emergency Procedures**

Where it has been determined that additional hazards exist (other than the fire), such as bomb threat, flooding etc, Emergency Procedures and Response Plans shall be available.

Emergency Procedures shall be appropriate to the Office and will be an integral part of the Business Continuity Arrangements.

### 4.16 Accident Reporting and Investigation

It is Robert Walters policy to insist that all minor accidents in the workplace must be recorded. Employees are responsible for reporting accidents to their line manager, and line managers for reporting on to the Safety Coordinator so that a record can be made including details of the injury, treatment/action taken, e.g., did they go home, go to hospital, or carry on working etc.

Reportable incidents, as defined by RIDDOR (the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) must be communicated to the Safety Coordinator, who shall ensure that a report is submitted to the relevant authorities, and where necessary also inform the Client. Reportable incidents include:

- A major injury or death occurs
- An accident occurs connected with work (including acts of violence) where the employee is unable to work for 7 days or more (including weekends, bank holidays and booked holiday) – not counting the day that the injury occurred
- Certain poisonings
- Certain skin diseases – eg, occupational dermatitis
- Infections such as tuberculosis, tetanus, etc.

Employees that witness a serious injury or accident it will be required to provide a written account of the circumstances.

Where reportable incidents occur to employees working away from one of Robert Walters offices, they shall be required to report to the Safety Coordinator, who shall where necessary, forward a copy of the report to the Client.

### 4.17 Expectant Mothers

It is recommended that a partner or 'buddy' is assigned to a pregnant woman who would assist her if the building needed to be evacuated. The same principle would apply to an employee who has returned to work but whose mobility is restricted due to illness or incapacity.

### 4.18 Manual Handling Operations

Robert Walters shall:

- Avoid the need for employees to be involved in manual handling as far as reasonably practicable
- Assess the risk of injury from any manual handling that cannot be avoided
- Reduce the risk of injury from manual handling, as far as reasonably practicable

Employees shall:

- Follow appropriate instructions laid down for their safety
- Make proper use of equipment provided
- Cooperate with management on health and safety matters
- Inform management if they identify potentially hazardous handling activities
- Take care to ensure that manual handling activities do not put other personnel at risk

Employees that have concerns regarding manual handling must contact the Safety Coordinator who will supply further information and/or training as necessary.

### **4.19 Mental Health**

It is Robert Walters policy to determine working methods that avoid exposing staff to excessive stress or other factors that may negatively impact their mental health. Managers and Directors shall be assisted to recognise signs of poor mental health including stress, and monitor related staff absence and behaviour.

Individuals are encouraged to report symptoms of stress to either their line manager or a member of the Human Resource Department. All reports are treated with strict confidentiality. Any employees identified with work related stress will be fully supported by Robert Walters, who will consider measures to help resolve issues, and where necessary seeking advice from occupational health professionals. The Directors shall be responsible for ensuring that the stress management procedures are enforced within their operational spheres.

### **4.20 Work at Height**

It is Robert Walters policy to plan work at height activities, ensuring those involved are trained and competent. Emphasis shall be given to avoidance of working at height wherever practicable. It is however recognised that this is not always possible and therefore a hierarchy of control measures shall be followed. In practice, and wherever possible, any working at height shall be undertaken by competent contractors.

Managers and Directors will be responsible for ensuring that any contravention of the above policy is dealt with immediately.

### **4.21 Work Equipment**

Employees are responsible for visually checking their own workstation daily and for checking any equipment they may need to use. Employees must only use equipment in accordance to instructions and training provided, and as designed for its purpose without adaptation. Any problems found with equipment should be reported to the Safety Coordinator and the equipment must not be tampered with.

It is Robert Walters policy to ensure all equipment is maintained, inspected and tested as applicable.

### **4.22 Display Screen Equipment**

It is Robert Walters policy that employees receive training on Display Screen Equipment (DSE). Robert Walters will provide any equipment that is identified as being necessary. In accordance with DSE Regulations Robert Walters shall provide eye testing for employees who are habitual users of computer equipment.

### **4.23 Company Vehicles and Personal Vehicles used for Company Business**

Where the office has implemented a Vehicle Policy, this must be adhered to. Drivers of vehicles are responsible for ensuring that they are maintained in a road worthy and safe condition and that any defects are reported and rectified in a timely manner.

Driving licences must be submitted to HR upon commencement of the use of a vehicle then annually thereafter, or sooner if requested.

Drivers shall submit to regular eye/vision tests in accordance with legislation or contractual requirements, and the results made available to HR for retention.

The use of hand-held phones and devices while driving is prohibited. They can only be used when safely parked, whether the medium is speech, text or any other form of data transfer. Hands free mobile conversations should only take place when traffic conditions make it safe to do so. If it is not safe, calls should be ignored or terminated. It is preferable for calls to be taken by the answer phone function and replied to when the driver has reached their destination.

Drivers are strongly recommended that operating satellite navigation devices is best undertaken when stationary. Common sense and due care should be used not to blindly follow miss leading or inaccurate navigational instructions.

### **4.24 Health Surveillance**

With the exception of eye tests outlined in Arrangement 4.22 above, it shall be Robert Walters policy to control work activities to a level where by health surveillances are not necessary. However should the situation change Robert Walters will consult with a medical practitioner or occupational health professionals.

### **4.25 Lone Working**

It is Robert Walters policy to restrict lone working to the absolute minimum. Employees who find themselves working alone on more than a few isolated occasions must contact the Safety Coordinator (or Local Representative) who shall ensure a risk assessment is undertaken.

Robert Walters shall ensure that employees, who have no option but to undertake lone working, are provided with instruction in the requirements of the risk assessment.

### **4.26 Drugs and Alcohol**

Robert Walters forbids the use of illegal drugs. It will be the individual's responsibility to notify their line manager when taking prescriptive drugs that may affect their performance or cognitive ability, especially if driving a car.

Robert Walters supports a policy of responsible consumption of alcohol.

The Human Resource Department should be contacted for further information or assistance.

### **4.27 Housekeeping and Waste Control**

It is the responsibility of each employee to keep work areas, gangways, and fire exits clear and free of obstruction. Any obstructions or spillages that cannot be dealt with immediately by an employee must be reported to the Safety Coordinator.

It is Robert Walters policy not to have food or unnecessary clothing stored under desks. All employees are required to remove clutter and rubbish to the appropriate waste bin.

A clear desk policy shall be implemented to the greatest practical extent.

Employees working at Clients premises are required to strictly adhere to their policies and standards.

### 4.28 Construction Design Management (CDM)

Where Robert Walters commissions construction work, conformity to CDM Regulations shall be implemented.

Under CDM, Robert Walters will only undertake the role of 'Client' and shall:

- Ensure adequate resources are made available
- Ensure suitable arrangements are made to manage the project
- Ensure arrangements are maintained
- Engage a Contractor (or Principal Contractor (PC) / Principal Designer (PD)
- Provide relevant H&S information
- Monitor compliance of the PC and PD
- Ensure a project is notified where required
- Ensure the project has a Construction Phase Plan
- Ensure the provision of relevant information
- Retain an H&S file and make it available to those who require it
- Ensure the Safety Coordinator monitors compliance
- Ensure competent persons/contractors are engaged

### 4.29 Contractor Selection and Control

It is Robert Walters policy to maintain a preferred contractor's database. Entry to the database shall be automatic for those with ISO45001 or SSIP certification (or equivalent). Those without shall be subject to vetting by the Safety Coordinator (or Local Representative) and will be evaluated on their response.

When engaged, contractors will be supervised, monitored and evaluated as appropriate, including compliance to their previously provided method statement, risk assessments etc.

### 4.30 Pandemic Controls

It is Robert Walters policy to appoint a Pandemic Coordinator to ensure that an appropriate risk assessment is undertaken at the commencement of any pandemic which has the potential to impact employees, both in the office or while traveling on business. See also Arrangement No.9 of this manual.

Controls shall be identified and documented that define the arrangements that need to be implemented. These arrangements must be communicated in accordance with Arrangement No.4 of this manual.