

ENVIRONMENTAL POLICY STATEMENT

O'Hagan Civils Limited provides and supplies plant hire services, skilled and unskilled railway contingent labour, civil engineering and construction works / services to Construction and Civil Engineering organisations within the Civil Engineering, Construction and Railway Industries.

O'Hagan Civils Limited is committed to protecting the environment and ensuring that any threats of pollution resulting from its work activities are identified and either eliminated, prevented or effectively controlled.

In pursuance of this policy O'Hagan Civils Limited will:

- protect the environment with reference to aspects of our work activities that are environmentally significant
- Comply with the Environmental Protection Act 1990, other relevant UK environmental legislation and regulations, and, clients' environmental requirements
- Comply with Clients' environmental procedures and requirements
- Assess on a regular basis the environmental impact of our operations
- Minimise environmental impact, for the life cycle (including disposal), of plant, equipment, and other physical assets under our control
- Set, monitor and review environmental objectives and targets with the aim of continual improvement in our environmental performance, and in line with Clients' targets and objectives
- Aim to include environmental considerations in investment decisions
- Minimise waste, noise and emissions to atmosphere in all parts of our business
- Reduce consumption of energy, fuel and materials
- Reduce the environmental effects of our operations on habitats, species and on natural habitat
- Wherever practicable use recycled or recyclable materials and components
- Encourage employee involvement in environmental action

This Policy statement supports Clients' Policy Statements. This policy shall be used to provide a framework for setting, monitoring and reviewing our objectives, which include protecting the environment and ensuring that any threats of pollution resulting from our work activities are identified and either eliminated, prevented or effectively controlled, fulfilling our compliance obligations, other specific commitments relevant to the context of our organisation, and, commitment to continual improvement of our environmental management system to enhance our environmental performance.

This Policy Statement will be communicated to all employees and will be made available to the public by the Operations Director. The Quality, Safety & Environmental Manager is responsible for ensuring that the policy is communicated, implemented and maintained throughout the organisation.

This policy statement will be reviewed by myself, at least annually, to ensure that it is relevant to our organisational activities and arrangements, and that it is up-to-date. The policy will also be reviewed upon introduction of a relevant new legislation / regulation, or change to an existing one. Where necessary, the policy will be revised to reflect the outcome of the review.

Signed



Operations Director

F. O'Hagan.

Dated: 1st November 2024.

EQUAL OPPORTUNITY POLICY

O'Hagan Civils Limited values the unique experiences of all individuals and groups. We respect people's right to hold their own values and beliefs and to be free from prejudice, abuse and unfair discrimination. We recognise the right of all people to be included in our employment recruitment and service delivery activities.

*O'Hagan Civils Limited is committed to complying at all times with its statutory obligations under the Equality Act 2010 and other various equal opportunity legislations including the Race Relations Act 1976, the Disability Discrimination Act 1995, etc. Hence, we encourage and enforce equal opportunities in all our business and employment activities, including recruitment, selection, training, promotion, provision of facilities, operational procedures, discipline and dismissal of our employees.

In pursuance of this policy, the Operations Director will ensure that Managers, Supervisors, Staff and Employees deal with people internally and externally without prejudice to their race, sex, gender, sexual orientation, disability, colour or religion at all times. O'Hagan Civils Limited will ensure that all people who have contact with the company's staff/employees are dealt with and treated with due respect and attention expected from an equal opportunity company.

O'Hagan Civils Limited will not tolerate any form of discrimination, victimisation, harassment, prejudice, disability, racism or sexism in any form or act, neither will any form of favouritism or exploitation on the grounds of disability, racism or sexism be permitted or tolerated from any person(s) engaged in the company activity.

Any Manager, Supervisor, Staff or employee found to be in breach of the statements within this policy in the performance of his/her duty, will be subject to immediate disciplinary action with the possibility of instant dismissal.

I am, as the Operations Director, responsible for ensuring that this policy is communicated, understood and implemented at all levels of the Company. To achieve this, I will ensure that the policy is communicated to employees as part of their initial induction on joining the Company. In addition, copies of this statement will be displayed in relevant areas of the company. I will set up a system to monitor its effective implementation.

I will review this policy statement at least annually, in order to ensure that it is still applicable, current, suitable and relevant to the company's business activities.



Francis O'Hagan – Operations Director

Date: 01/11/2024

Quality Policy Statement

O'Hagan Civils Limited is a supplier / provider of civil engineering, plant hire and on-track labour services to the Railway, Civil Engineering and Construction Industries.

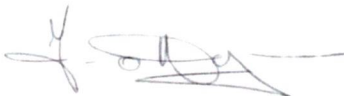
***Our policy is to supply and deliver our railway civil engineering services using competent, skilled, experienced and safety-conscious employees, to fulfil our contractual obligations, meet applicable UK legislative requirements, fully satisfy and meet the requirements of our clients and exceed our client/customer expectations, by continually improving our approach and processes. O'Hagan Civils Limited is fully committed to working with suppliers and customers to establish and maintain the highest quality standards.**

This policy shall be used to provide a framework for setting, monitoring and reviewing our objectives which is to deliver our services efficiently and to the highest standard, by commitment to continual improvement in our service and quality performance, delivering fully compliant and satisfactory services, on time and within budget, in an environmentally-friendly and accident-free manner and to the total satisfaction of our clients.

This policy shall be communicated, understood, implemented and maintained at all levels of O'Hagan Civils Limited. The Operations Director is responsible for formulating the Company Policies whilst the Quality, Safety and Environmental Manager has the responsibility for ensuring the effective implementation of this Policy Statement, and therefore has the full support of the Operations Director for achieving that responsibility. In order to promote the adoption and implementation of the policy, all staff and employees shall be encouraged to understand and discharge their individual responsibilities to a degree necessary to ensure the effective operation of the Quality Management System. Agents, Foremen, Staff and employees are responsible for ensuring that the quality of their own work meets the appropriate standards.

The Policy Statement, including its changes, shall be communicated to all managers, agents, foremen, staff and employees as part of their induction, pre-work site induction and periodic refresher sessions. Copies of the Policy shall also be issued to employees and subcontractors, displayed on our web-site for communication to our clients, suppliers and other interested parties, and, on our site notice-boards where available. The Operations Director shall ensure that everyone within the organisation is conversant with the Quality Policy and Objectives.

This policy shall be reviewed periodically (at least annually) by myself in order to ensure that it is current, suitable and relevant to the company's business activities.



Signed:
Operations Director

1st November, 2024.

EQUALITY & DIVERSITY POLICY STATEMENT

O'Hagan Civils Limited is a provider of civil engineering and construction services, as well as operated and self-operated construction and civil engineering plant, to Railway, Civil Engineering and Construction Industries.

We are committed to equality of opportunity in all aspects of our business activities.

An important part of this commitment is encouraging, and where possible requiring, companies and other organisations we do business with to practice equality and diversity in all their activities.

*We are legally responsible under the Equality Act 2010 which incorporates the Race Relations Act 1976 and the Disability Discrimination Act 1995, and, will not do business with any supplier or use a subcontractor who breaches a race or any other equality standard we observe.

This policy statement forms an important facet of our Equality and Diversity Strategy and will be periodically reviewed.

Our Quality, Health, Safety and Environmental Manager assists in the assessment of compliance with this policy / strategy.

We will incorporate equality and diversity issues in all our business activities to ensure the following occur:

- Our equality and diversity policy is reflected in service delivery plan and review.
- Our equality and diversity policy is reflected appropriately in the process and procedure associated with purchasing and procurement generally.
- Local Community needs are reflected in service delivery plan and review.
- Suppliers and Sub-Contractors fulfil their own equal opportunities obligations as employers in respect of race and other equality and diversity issues when carrying out work for us.

The Policy shall be communicated to all managers, supervisors, staff and employees as part of their induction. Copies of the Policy shall also be displayed within the Company. I, in my position as the Operations Director, shall ensure that everyone within the organisation is conversant with this Policy.

This policy shall be reviewed periodically (at least annually) by myself, in order to ensure that it is current, suitable and relevant to the company's business activities.



Francis O'Hagan – Operations Director

Date: 01/11/2024

DRUGS & ALCOHOL POLICY

This policy shall apply to those whose work is under the control (i.e. work directly for or subcontractor's worker) of O'Hagan Civils Limited (herein later referred to as 'relevant persons').

O'Hagan Civils Limited is committed to Safe Systems of Work. To demonstrate this, O'Hagan Civils Limited will comply with the Health and Safety At Work Act 1974, the Transport and Works Act 1992.

O'Hagan Civils Limited will ensure total compliance with those requirements and the requirements of its Drugs & Alcohol Policy by subjecting all relevant persons (employees and employees of its sub-contractors) to 'for-cause' drugs and alcohol testing following an accident or incident and/or suspicious behaviour.

Persons being subjected to 'for-cause' drugs and alcohol testing shall not be allowed to resume work until the results of their testing are known. Relevant persons (employees and employees of its sub-contractors) found to be tested positive on any of those checks will either not be employed or be immediately dismissed from employment.

Relevant persons (employees and employees of its sub-contractors) are requested to immediately report the use of any prescribed and/or over-the counter medication whilst under the employment of O'Hagan Civils Limited to the Operations Director, Site Agent or Site Supervisor, prior to embarking on the prescribed drugs. Failure to report or disclose this will lead to the employee being subject to the company disciplinary procedure which may lead to instant dismissal. Upon the receipt of such report, the Operations Director reserves the right to take suitable and appropriate decision which may include the decision to relieve such relevant persons from working on behalf of the company, taking into consideration the type of drug prescribed and the nature of advice/instruction given by the GP / Pharmacist. Information on results of drugs and alcohol testing and individual safeguards shall be treated and maintained with strict confidentiality. In line with O'Hagan Civils Limited's Appeals Policy, appeals relating to drugs and alcohol testing must be lodged in writing with our Managing Director within 3 working days of the testing. Information on help and support available to those with drugs and alcohol problems are available with the Health, Safety, Quality & Environmental Manager.

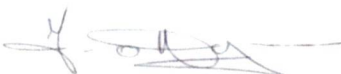
O'Hagan Civils Limited will not accept any relevant persons to present themselves for work whilst under the influence of drugs or alcohol. Anyone in breach of this will be dealt with in accordance with the company's disciplinary procedure. O'Hagan Civils Limited's employees or its sub-contractors **MUST NOT**

- Report, or try to report, for duties when unfit for work through drugs or alcohol
- Consume alcohol or drugs while on duty
- Be in possession of alcohol or drugs on railway premises
- Drink 12hrs before or while on duty
- Wear high visibility or O'Hagan Civils Limited identification or uniform on licensed premises
- Use any drugs or alcohol at any time
- Have the smell of alcohol whilst on duty
- Accept call for duty if in breach of any of the above or if they have any doubt about fitness for work.

O'Hagan Civils Limited will regularly monitor compliance with this policy and maintain accurate and up-to-date records.

This policy will be briefed to all employees as part of their initial induction. Copies of the policy will be given to all relevant persons and the receipt acknowledgment by each person shall be maintained (on personnel files for employees). O'Hagan Civils Limited will communicate, implement and maintain this policy at all times with the organisation. It is the responsibility of the Operations Director and Site Agents / Supervisors to implement and maintain the drugs and alcohol policy.

The Operations Director will regularly review this policy, at least once a year. The policy will be revised and updated whenever deemed appropriate and necessary to do so.



Operations Director

01/11/2024
Date

BEHAVIOURAL SAFETY POLICY

O'Hagan Civils Limited is committed to improving Behavioural Safety among its workforce as part of its Safe Systems of Work arrangements.

We, at O'Hagan Civils Limited, believe that the issue of behavioural safety has its origin in people focussing on attaining and developing skills to do a job / task without sufficient consideration for the processes involved in carrying out the task as well as, the potential hazards associated with carrying out the task, physical and mental conditions, and/or, through complacency.

Accidents / Incidents and Near-miss data, commonly point out to poor behavioural safety as a root cause of accidents and incidents, and, therefore, our approach shall use information from accidents / incident reports, as well as lessons learnt from accident / incident investigations, to drive improvements in behavioural safety among our workforce.

We shall use that, as well as the on-going implementation of our Programme on Behavioural Safety outlined below, to drive continual improvement in Behavioural Safety among our Workforce.

Behavioural Safety Programme

Each Year, the Operations Director, with the support of the Company's HSQE Manager, shall organise a Safety Culture / Climate Survey involving all company Staff, Employees, Supervisors and Managers. The Survey shall be carried out by appointed External Professional Psychologist who is experienced in conducting such a survey. The Survey shall involve using a Survey Questionnaire compiled with the guidance / support by the Psychologist. The Questionnaire shall be issued to everyone. A time-frame of 1 month for the Survey Questionnaire to be anonymously completed and returned in a pre-paid envelope, to the External Psychologist. A closing date for the return of the completed Survey Questionnaire shall be announced at the time of the issue, and, reminders for the return date shall be regularly and widely publicised.

The completed / returned Survey Questionnaire shall be confidentially analysed by the Psychologist within a month of the closing date for the return. The analyses shall be also be summarised, and, both analyses and summary, shall be handed back in a sealed envelope to the Operations Director.

Within 2 weeks of the return of the Analyses and Summary, series of open meetings shall be held by both the Operations Director and the HSQE Manager, with different work-groups, to discuss the outcomes of the survey and its interpretation / relevance to each group. Following the series of meetings, a final analysis shall be compiled between the Operations Director and the HSQE Manager, highlighting summary of responses and issues from each group, as well as the main / overall trends emanating from the Survey.

A final meeting / open-forum involving the whole company employees, members of staff and managers, shall be called, not later than the end of the third month from the start date, to announce the outcomes of the survey, including feedbacks, in anonymous manner, and a timing plan of actions shall be discussed and agreed for implementation.

The HSQE Manager shall be responsible for coordinating implementation of the agreed improvement plan, which shall include training, presentations and seminars, as well as for monitoring progress. He / She shall present a formal progress report to the Directors on quarterly basis.

This programme shall be reviewed and repeated annually. O'Hagan Civils Limited will regularly monitor compliance with this policy and maintain accurate and up-to-date records.

This policy will be briefed to all employees as part of their initial induction.

The Operations Director shall regularly review this policy, at least once a year. The policy will be revised and updated whenever deemed appropriate and necessary to do so.



Operations Director

01/11/2024
Date