Putting your health and safety first
Our health and safety policy

February 2022
Introduction

Eversheds Sutherland (International) LLP is committed to high standards of health and safety management. The responsibility for establishing and maintaining policies on health and safety matters lies with the Executive of Eversheds Sutherland (International) LLP.

We all have a personal responsibility for observing safety policies, rules and procedures.

Ensuring safety awareness, positive attitudes and continual improvement in safety performance requires the commitment and active involvement of all colleagues and onsite contractors.

It is our policy to maintain high standards of health and safety management and to encourage everyone to contribute to their own welfare and that of their colleagues and others affected by our activities.

Effective health and safety management, including training, improves performance, raises safety awareness and reduces work related injuries and ill health. Therefore, so far as is reasonably practicable, our objectives aim to avoid accidents, injuries and ill-health, and to prevent damage to property and maintain a positive working environment.

To achieve this we are committed to the following principles:

- providing safe and healthy working conditions for the prevention of work-related injury and ill health
- eliminating hazards and reducing occupational health and safety risks
- establishing arrangements for the effective organisation, planning, monitoring and reviewing of health and safety policies and procedures
- continually improving our occupational health and safety management system (OHSMS)
- engaging, communicating and consulting with all colleagues and onsite contractors on occupational health and safety issues
- complying with relevant health and safety legislation and other compliance obligations; and
- encouraging the use of industry best practices wherever reasonably practicable.

This Policy Statement, our OHSMS and our objectives and targets will be regularly reviewed by the Health and Safety Steering Group and will be internally and externally audited to ensure that they continue to improve safety performance and reduce work related injuries and ill health.

Eversheds Sutherland will continue to raise and maintain awareness of this policy through guidelines, internal communications and staff training and will ensure it is available to internal and external parties through our intranet and website.

Keith Froud
Managing Partner International
February 2022
Principles

The firm will ensure that health and safety management is co-ordinated to ensure:

- resources are allocated appropriately and necessary training provided
- policy, procedures and safe working practices are consistent and standardised wherever possible
- best practice is shared
- duplication of effort is avoided

The Executive will be responsible for this co-ordination.

The policy applies to all Eversheds Sutherland business with the responsibility and ownership of health and safety being with Senior Management at each location.

All policies, arrangements, procedures and safe working practices will be developed in co-operation with relevant colleagues and colleague representatives to ensure full involvement and ownership.

The firm will continually review and develop this policy and health and safety management systems, with the overarching aim of continuous improvement in health and safety performance while conducting its activities in a manner which does not affect the health and safety of any colleagues, clients, visitors or contractors.
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Procedures

Accident prevention and corrective actions

In accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013, the following must be reported to the HSE Incident Contact Centre (ICC) on statutory form F2508 or F2508A:

− a death or major injury
− an over 7 day injury (an accident at work resulting in an individual being unable to work for 7 days or more)
− a work related reportable disease
− a dangerous occurrence (an incident that does not result in a reportable injury, but clearly could have done, eg Fire)

Reports are submitted by Senior Facilities Representative on site or the Environment, Health & Safety Manager.

All accidents, irrespective of the seriousness of the injury, are to be recorded in the accident book and an internal accident/incident form completed. All accidents and incidents are to be investigated by the Senior Facilities Representative on site. To comply with HSE requirements occupational accidents that cause injuries resulting in a worker being away from work or incapacitated for more than 3 consecutive days (not counting the day of the accident but including any weekends or other rest days) must be recorded. Over 3 day injuries do not need to be reported unless the incapacitation period goes on to exceed 7 days.

Further information on accident/incident reporting is available from a facilities representative.

The results of all accident investigations will be reviewed by the Environment, Health & Safety Manager to establish any trends and will be discussed at local Environment, Health and Safety Committee meetings. The results of this analysis will be used to plan and implement corrective actions required to reduce the risk of further incidents.

Additional assistance and support at work

Eversheds Sutherland recognises that some of its people may require extra or different facilities or assistance and will take reasonable steps to ensure these needs are met. Records of special requirements in an emergency will be kept by the Facilities Department. Individuals with a disability which they believe may affect their health and safety at work, should discuss it with their manager and/or local facilities representative.

Managers are required to ensure that risk assessments are carried out to cover all activities and may, in some circumstances, be required to specify alternative procedures to meet the specific needs of an individual. Managers should notify the local facilities representative to discuss any requirements further.

Facilities will produce a Personal Emergency Evacuation Plan (PEEP) for individuals with a disability, through discussions with the individual to ensure that they, and their colleagues, are aware of the action to take in the event of an evacuation.

Constant supervision of vulnerable employees (individuals with disabilities, pregnant women, young persons, lone workers, and people working from home) is not always possible or necessary. It is still however, management’s responsibility to provide appropriate guidance, training and overall control of colleagues work. Depending on the risks involved, the experience and competency of the individual will determine the extent of supervision required, and this will always be a management decision.
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Individuals who are diagnosed as HIV positive or as suffering from any other chronic illness are encouraged to obtain advice and support from their local HR team. Eversheds Sutherland will ensure, so far as reasonably practicable, that resources are available to provide support, and will make any reasonable adjustments to working conditions or the workplace to enable an individual to continue to work.

Catering and vending

The firm provides reasonable access to hot drinks during working hours.

Concerns regarding catering, should be made to Facilities immediately so that the incident can be investigated and control measures adopted.

Where catering equipment is provided individuals must:
- use equipment in line with the operating instructions and for the intended purpose
- ensure that everything is left clean after use and maintain good standards of hygiene
- report any defects or problems to Facilities immediately, including infectious conditions which could be transmitted through food
- exercise caution when carrying hot drinks around office premises and keep food and drink away from electrical equipment

Contractor selection and assessment

Potential and existing trade or specialist contractors and consultants will be assessed (when first employed and annually thereafter) for competence, to undertake their work in accordance with health and safety requirements. Only contractors who are assessed to be competent may carry out work for the firm.

Trade contractors will be required to identify significant hazards, prepare risk assessments and, where appropriate, method statements for the work they are required to carry out.

Any contractor carrying out hot-work, electrical, mechanical, work at height, out of hours work, work with asbestos or confined space work will require an appropriate permit.

Contractors and sub-contractors must complete an online Eversheds Sutherland EHS induction prior to their first working day.

Control of Substances Hazardous to Health (COSHH) & protective equipment

Everyone is expected to dress in a manner that is appropriate for their work. Where risk assessments indicate that additional protection is required, in the form of Personal Protective Equipment (PPE) or Respiratory Protective Equipment (RPE), this will be provided by Eversheds Sutherland. Contractors must provide their own PPE and RPE. Risks that might require such protective equipment include burns or scalds, irritation, cuts and abrasions, crush injury, skin disorders through handling materials, puncture of the skin or splinter and absorption of hazardous substances through the skin.

Everyone who is issued with PPE or RPE will receive appropriate training and information on its safe use, storage and maintenance.

Where possible, hazardous substances will be replaced by non or less hazardous ones. Where this is not possible, measures will be applied to minimise and control the risk and quantities of any hazardous substance shall be kept as low as is reasonably practicable.

Adequate lockable storage will be made available for the containment of hazardous substances via Facilities Management.

Anyone who works with or comes into contact with hazardous substances will be informed of the results of COSHH risk assessments that are relevant to their work and receive training and information on the health and safety issues.

Contractors providing and using hazardous substances must provide Facilities Management with relevant COSHH assessments.
Hazard warning signs will be displayed in areas containing hazardous substances and areas containing hazardous substances will be kept locked whilst unoccupied.

Where asbestos exists, or is suspected in Eversheds Sutherland premises, a full survey and risk assessment shall be undertaken and records of all findings kept by Facilities Management. A management plan shall be prepared by Facilities Management to either contain the asbestos safely or have it removed by a licensed contractor.

An asbestos register will be maintained by Facilities Management for each property containing asbestos, showing the location, type and condition of the asbestos. Details will be made available to all employees and contractors via Facilities Management.

Construction safety
Where construction works or refurbishment takes place on Eversheds Sutherland premises Facilities Management will ensure they are undertaken in accordance with the CDM regulations.

Driving on Eversheds Sutherland business
Eversheds Sutherland recognise that individuals may need to drive in the course of their work and are committed to reducing the risks that may be created as a result, whether they are using a company, their own or a hired vehicle.

Anyone driving for work must never drive faster than conditions safely allow and must obey posted speed limits at all times.

The Safe Driving Policy provides health and safety advice and should be read in conjunction with this section of the Health and Safety policy.

Display Screen Equipment and eye tests
Eversheds Sutherland will take all reasonable steps to secure the health and safety of all individuals who work with display screen equipment (DSE).

The firm acknowledges that health and safety hazards may arise from the use of DSE. It is the firm’s intention to ensure that risks are reduced to a minimum.

DSE training must be undertaken by everyone via an electronic training package. An email invite is sent to all new joiners. Where there are significant changes in work practices or layout, everyone will be sent a communication requesting them to re-assess their workstation. Facilities will evaluate the assessments and implement any additional measures that are required.

Medical evidence shows using DSE is not associated with damaged eyes or eyesight. Prolonged unbroken use of DSE can lead to temporary problems caused by tired eyes, including red or sore eyes and headaches.

Within the UK and Europe all DSE users are entitled to request a free eye test. These will be offered thereafter on a regular basis (varying from individual to individual). These tests are limited to an assessment of the visual capability to see the screen and must be undertaken by an optician in conjunction with the Eye Care Voucher scheme. Vouchers may be collected from the Facilities Department. The chosen optician for Eversheds Sutherland in the UK is SpecSavers.

If (for medical reasons only) individuals have to use an optician other than SpecSavers the firm will reimburse the cost of the eye test and spectacles (as required under the DSE regulations) on production of a receipt.

Safe keeping of the spectacles/lenses is a personal responsibility. Eversheds Sutherland will not pay for any replacement lens or frame which is lost or broken.

Documentation, Consultation and Communication
All Eversheds Sutherland documentation will be clear, visible and available to everyone, and will be developed in accordance with the requirements of ISO45001. ISO45001 gives requirements for an occupational health & safety management system to enable the firm to control health & safety risks and improve its performance.

Effective health and safety management involves consultation between everyone at all levels. Consultation in Eversheds Sutherland will be carried out via representatives at regular meetings of
the Environment, Health and Safety Committee and, where appropriate, by direct consultation when required. The Health and Safety Steering Group will discuss health and safety issues raised by the Committees.

The Executive will communicate their commitment to health and safety and ensure the firm's Health and Safety Policy and arrangements are available and familiar to all.

Communication methods include:
- induction, Insite, written notices, memos, emails or other formal documents
- verbal instruction or guidance by managers or supervisors
- leading by example

Eversheds Sutherland acknowledges its responsibility to consult in good time on matters that could affect health and safety, specifically:
- the introduction of new technology
- arrangements for appointing competent persons to assist with health and safety
- information that should be given to employees under such regulations as COSHH
- training required under health and safety legislation

**Electrical and Gas Safety**

Only qualified electrical engineers are permitted to undertake electrical repairs and installations to Eversheds Sutherland occupied premises.

All electrical control panels, risers and switch rooms must be kept locked.

All modifications or additions to electrical systems are tested and a NICEIC Minor Electrical Installation Works Certificate (or local equivalent) issued in each case.

Personal electrical items must not be brought onto the firms premises.

All faults and requests for inspections/assistance should be made via Facilities.

Facilities Management arrange for fixed electrical wiring installations in Eversheds Sutherland premises to be examined and tested every five years in line with the IEE Regulations or at intervals determined by the Installation NICEIC certificate (or local equivalent).

All portable electrical appliances owned and used by Eversheds Sutherland are Portable Appliances Tested (PAT) in accordance with their use (see separate PAT testing policy).

Testing and inspections of portable appliances which are used but not owned by Eversheds Sutherland is the responsibility of the supplying company. All faults on portable appliances must be reported to Facilities.

In the UK Facilities Management will arrange for appropriate CAPITA registered contractors to maintain gas installations on behalf of Eversheds Sutherland.

**Emergency procedure**

Emergency lighting is installed in the firm's premises where lighting is required in the event of mains and standby power failure.

Facilities arrange for inspections of the emergency lighting on a rolling monthly basis. Emergency lighting systems are tested and serviced annually and maintenance, servicing and testing is recorded by Facilities.

Written emergency procedures are provided for all Eversheds Sutherland occupied premises. These instructions include procedures for fire and bomb drills and internal and external evacuations. Fire procedures can be found within this policy, on Insite and at the fire point areas (fire action notices). Bomb procedures can be found on Insite, where applicable.

There are adequate means of escape located in all Eversheds Sutherland occupied premises. The means of escape are clearly signed with pictograms.

Facilities and Security inspect fire routes regularly to ensure there are no obstructions to the escape routes and all individuals should ensure that items do not block escape routes.
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Where disabled persons have been identified a Personal Emergency Evacuation Plan (PEEP) will be produced by Facilities Management. Security and Floor Marshals are advised of all PEEPs. Evacuation chairs or fire lifts for assisting in the evacuation of disabled or injured persons are provided in all Eversheds Sutherland occupied premises.

Floor marshals are nominated on each floor of each building. Names are displayed on the health and safety pages of Insite, and are also displayed (with photos) on the health and safety information boards in all Eversheds Sutherland occupied premises.

In the event of the fire alarm being activated everyone must leave the building by the nearest signed exit and assemble at the designated assembly point, unless instructed otherwise by the emergency services or a floor marshal. Visitors should be escorted out of the building by their host during an evacuation.

Evacuation assembly points are shown on the health and safety pages of Insite.

Records of all evacuations are kept by Facilities Management.

Individuals working on premises other than those belonging to Eversheds Sutherland should follow the emergency procedures of that site.

Environment, Health and Safety Committee meetings and board reports

The Environment, Health and Safety Committees meet on a quarterly basis, to discuss current environment, health and safety matters and future developments. Attendees include Departmental Managers, Facilities Representatives, line managers and representatives from relevant departments.

Minutes will be prepared and distributed by the Facilities Representatives. They will be displayed on the health and safety notice boards, and placed on Insite.

The Environment, Health & Safety Manager shall prepare and present an Annual Report to the Executive. Included in the report will be details of the following:

- data relating to accidents and incidents over the period covered
- recorded incidents of failure of procedures
- corrections and revisions made to the SMS since the last report
- the adequacy of the current Emergency Procedures, including any instances where they have been tested
- a summary of findings from the Annual Audit
- a Safety Plan giving details of the improvements and modifications to be implemented over the coming year

Please refer to the Health and Safety Role Responsibilities, for further details.

Environment and WEEE Regulations

Eversheds Sutherland is committed to reducing its impact on the environment. The firm has a separate Environmental and Sustainability Policy which outlines the arrangements for improving its environmental performance. The firm’s procedures for disposing of its waste electrical and electronic equipment are set out in a separate WEEE policy.
External Courses and Events

All off site events must meet the firms health and safety standards. Contractors must submit their method statements and risk assessments prior to the event. The information must be checked by the event co-ordinator.

Any concerns with regards to the health and safety of venues should be communicated to the Environment, Health and Safety Manager.

Event forms should be completed and are found on the Health and Safety pages of Insite.

Event locations and activities which do not confirm with Eversheds Sutherland health and safety policy should not be considered and alternative arrangements should be made.

First Aid

Qualified First Aiders are located in every Eversheds Sutherland office. The names and locations of the First Aiders are posted on Health and Safety notice boards and on the health and safety pages of Insite. All first aiders have access to a first aid kit.

First aiders should record all accidents via the online portal. All incidents including those classed as a near incident should be reported and recorded. Facilities Management will conduct investigations of all accidents and incidents. Where appropriate, control measures will be implemented to prevent recurrences.

Accidents that happen off site, but whilst on Eversheds Sutherland business, should be reported to the host as well as Eversheds Facilities Management.

Accident statistics are presented quarterly and annually to the Environment, Health and Safety Committees.
Fire Risk Assessments, detection, alarms and equipment

All Eversheds Sutherland owned premises have a fire detection system (smoke detectors, heat detectors, photo-electric beam motion detector or sprinkler systems).

All Eversheds Sutherland premises have adequate means of raising the alarm in the event of a fire and fire alarms are tested in Eversheds Sutherland occupied buildings once a week. The fire alarm is activated by pressing the break glass on the front of the red alarm call point. Where installed, Facilities arrange for sprinklers to be tested and pressure testing is undertaken after alterations. Facilities also arrange for annual wet/dry riser pressure testing.

Fire alarms are tested in each office on a weekly basis.

Adequate firefighting equipment is installed in Eversheds Sutherland occupied premises. These consist of one or more of the following:
- fire extinguishers (water, dry powder, foam, carbon dioxide or wet chemical)
- sand buckets
- fire blankets
- automatic sprinklers
- hose reels
- fixed gaseous fire suppression systems

All concerns relating to the fire detection systems or firefighting equipment should be directed to Facilities.

Fire risk assessments are undertaken for all Eversheds Sutherland premises. A full copy of the risk assessment can be requested from the Environment, Health and Safety Manager. Fire risk assessments will be monitored regularly and reviewed when there are any significant changes.

Each office Facilities Representative is responsible for the provision and maintenance of fire prevention and detection equipment in the areas for which they are responsible.

Heads of Department and line managers are responsible for keeping their work areas safe from fire. Individuals will be trained in fire prevention practices and evacuation procedures, including arrangements for disabled or vulnerable individuals.

Floor marshals receive training to enable them to carry out their duties. Floor Marshals are responsible for carrying out periodic inspections of the fire precautions in their designated areas. These checks are recorded in the inspection records contained in the fire safety section of SMS. Full duties of Floor Marshals are on Insite.

All new starters receive information on fire procedures during induction training. Training includes information on what to do in the event of discovering a fire, the action to take on hearing the alarm, where the assembly points are and how to recognise a Floor Marshal. Contractors are provided with information on fire procedures via their EHS induction.

Fire training is provided to everyone via an email which directs them to a fire safety e-learning training programme.

A practice fire evacuation will take place twice a year, and the results will be recorded in the fire safety section of the EHSMS. Floor Marshals will review the effectiveness of the drill with the Facilities Representative.

Health and Safety Policy, Training and Suggestions for Change

The Policy will be regularly reviewed by the Environment, Health & Safety Committee and audited at least once a year to ensure it continues to be consistent with current health and safety legislation and the specific needs of the firm.

The Health and Safety Policy is available on Eversheds Sutherland intranet. The Policy statement is included on the first day new starter/induction and every new starter is requested to familiarise themselves with its content and their individual obligations. As part of the induction and the Quarterly check ins (QCIs), the requirements for health & safety related training of all new and existing employees must be assessed.

The health & safety induction training explains:
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- the health and safety responsibilities associated with the individual's role and their role within the firm
- any specific hazards and controls required in relation to their role
- specific health and safety information and arrangements relevant to their position
- emergency information such as the location of fire exits, first aiders etc
- additional health and safety training may be arranged and managers will take account of capability and competence when tasks are allocated

Contractors will not be allowed on site unless they have received EHS induction prior to starting work.

Proposals for change should be submitted to the local Facilities Representative, who will present the proposal at the Environment, Health and Safety Committee meeting.

Home working

Formal home working requests should be forwarded to HR and will be considered in line with the Flexible Working policy. An online home working risk assessment must be completed prior to home working.

The home worker should report any work-related accidents and incidents occurring in the homework area via the online portal. An accident form should be completed and Facilities will undertake a formal investigation of the accident/incident.

Blended working

When working from home colleagues should report any work-related accidents and incidents occurring in the homework area via the online portal. An accident form should be completed and Facilities will undertake a formal investigation of the accident/incident.

Lifts

Lifts in Eversheds Sutherland offices should be used in accordance with local instructions and within the carrying capacities specified. Lifts must not be used as a means of escape during a fire evacuation, drill or other emergency procedure.

In the event of a breakdown or power failure individuals must not attempt to force their way out of the lift and should raise the alarm by following the instructions provided within the lift. An authorised lift operator will be called in such an emergency.

Manual Handling of Heavy Loads

Manual handling activities will be avoided as far as is reasonably practicable. Where this is not possible, risk assessments will be carried out to identify the levels of risk involved and the precautions needed to manage them effectively. Risk assessments will be reviewed whenever there is reason to believe that they may no longer be valid.

Training and information will be provided to anyone required to undertake manual handling operations with line managers responsible for monitoring the effectiveness of training.

Monitoring Safety Inspections and Audits

Partners, Managers and Supervisory staff will ensure that all work under their control is being carried out in accordance with the Health and Safety policy and the arrangements.

Health and safety inspections will be carried out at regular intervals, at least monthly by the Facilities Managers. The results of the inspections will be kept on site.
Noise

Noise should be kept to a minimum at all times, especially during office hours in occupied buildings. Anyone concerned about the level of noise in their regular place of work should contact their local facilities representative.

Risk assessments will be carried out if any employee is likely to be exposed to noise levels in excess of 80db(A). In addition, maintenance and assessment records will be kept of any equipment that is likely to expose employees to this level of noise or above.

Exposure to daily personal noise levels above 80dB(A) or noise pressures above 200Pa will be eliminated whenever practicable or, failing this, engineering controls will be implemented to reduce noise to safe levels. Where this is not possible, suitable hearing protection will be supplied and must be worn by all individuals exposed to the noise.

Appropriate training and information will be provided to all users of hearing protection.

Warning signs will be displayed in areas with an identified noise hazard.

Risk Assessment

Eversheds Sutherland accepts that some of its activities, if not adequately controlled, may create risks and will take all reasonably practicable steps to reduce risk to an acceptable level.

It is the firm's policy to comply fully with the law regarding risk assessment as set out in the Management of Health and Safety at Work Regulations.

Hazards should be reported to Facilities so that remedial action can be taken.

The most important considerations are that:

− all hazards are identified and risks assessed
− appropriate control measures are implemented
− the process is recorded and documented to facilitate control
− all relevant parties, including visitors and contractors, are informed of the actions

When a hazard cannot be completely eliminated it will be highlighted by a safety sign. Safety signs will be monitored and reviewed regularly by Facilities Management.

The Environment, Health and Safety Manager and/or competent persons shall conduct generic health and safety risk assessments for Eversheds Sutherland occupied premises. Copies of risk assessments will be available via the online portal. Risk assessments will be regularly reviewed or when there is a significant change, or following an accident/incident.

Hazards will be eliminated so far as is reasonably practicable by implementing control measures and safe systems of work.

Expectant mothers should inform HR as soon as possible of the pregnancy so a risk assessment can be arranged. Risk assessments cover preventing sitting in one position for long periods of time, preventing working in a standing position, avoidance of manual handling tasks, provision of adequate rest periods and welfare facilities, and avoidance of contact with chemical agents. New mothers workstation assessments will be reviewed upon their return to work and further details can be found in the Maternity policy.
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Environmental, Health and Safety Management System (HSMS)

The Environmental, Health and Safety Management System (EHSMS) is based on the requirements of ISO45001 and ISO14001. The EHSMS is a database which contains Eversheds Sutherland environmental, health and safety records and information for all offices. The EHSMS covers how the firm organises itself to create an effective management structure and arrangements for delivering the policy.

Responsibility for the implementation, operation and performance of the EHSMS, lies with line management. For policy, compliance obligations and experience to be applied effectively, safety co-ordinators and, professional safety consultants are available to support line management.

Security & Working out of Hours

The security of everyone whilst at work is of major importance. However, it is also very important to ensure that Eversheds Sutherland offices are fully accessible to clients and visitors.

Everyone is responsible for ensuring that our offices remain a secure place to work and this can be done by everyone:

− being wary of anyone unfamiliar attempting to pass through a security door, especially if they are not displaying a security pass
− being prepared to challenge anyone acting suspiciously
− being fully co-operative and showing passes on request
− displaying their security pass at all times when in the office (including other Eversheds Sutherland offices)
− taking good care of their security pass and reporting its loss immediately to Facilities

Where available, Security will undertake patrols out of normal working hours. Security should be contacted if anyone needs assistance out of normal working hours.

Work Related Stress Management and Counselling

Work related stress counselling services are available to everyone, and individuals are encouraged to access the counselling service. Wherever possible, individuals should discuss concerns with their manager so that working conditions and workloads can be reviewed and adjusted, as appropriate. Where the matter cannot be discussed with their manager, the local HR team should be contacted.

Employees can call Employee Assistance Programme which is available 24 hours a day, 7 days a week throughout the year.
Substances (Alcohol, Drugs and Smoking)

Eversheds Sutherland promote health and wellbeing to minimise problems at work arising from the use of alcohol and other drugs. Eversheds Sutherland accept it is a personal decision to drink alcohol or use drugs but do not condone the excessive and inappropriate use of alcohol or the misuse of drugs, whether illicit or prescribed. Eversheds Sutherland encourages those with dependencies to come forward for confidential help. Concerns should be raised with a manager or HR, or the Employee Assistance Programme utilised.

It is recognised that a safe and healthy working environment is put at risk by people who use alcohol or other drugs in a way that affects their health, work performance, conduct or working relationships. Eversheds Sutherland expects people at all levels to act responsibly and professionally at any work-related social function, including when entertaining clients.

Being under the influence of alcohol, drugs or medicines to an extent that impacts on performance or conduct, or affects the ability to drive safely, whilst at work (including attending any event whether social, marketing or otherwise on any Eversheds Sutherland premises or elsewhere) will be regarded as gross misconduct and may result in instant dismissal. The use of illegal substances is prohibited at all times. The supply of drugs or influencing others to take drugs will be viewed as gross misconduct and disciplinary action will be taken.

Where anyone is found or suspected to be suffering from the effects of alcohol or illegal drugs at work they will be sent home (taking account the employer duty of care). HR will arrange an interview prior to any formal action being considered but Eversheds Sutherland reserves the right to follow management procedures or to monitor conduct in accordance with policy.

Smoking, including e-cigarettes is not permitted in any part of Eversheds Sutherland occupied premises. Smoking outside the main reception/front of Eversheds Sutherland offices is not permitted.

Vermin

Where pests are suspected, Facilities Management will arrange for vermin control measures. If pests are sighted in Eversheds Sutherland premises Facilities should be contacted.

Visitors

Visitors to Eversheds Sutherland occupied premises are the responsibility of their host. Health and safety guidance, including the procedures to take in the event of a fire, is displayed on the back of the visitors pass. At the end of their visit, the visitor should be escorted to the reception by the host, and their visitor pass returned.

Washroom and Rest Facilities

Adequate lavatory and hand washing facilities will be provided and maintained for the number of employees and, where appropriate, additional washing facilities to remove contamination from work activities.

A supply of clean drinking water will be provided, along with water heating facilities. An area for eating will also be provided that is away from the normal place of work.

Waste Management

All recyclable waste should be disposed of in the appropriate recycling bins located around the offices. Non-recyclable waste should be placed in the general waste bins. Facilities should be contacted for high volumes and larger waste items.
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Water Hygiene

Eversheds Sutherland aim to control the risks to the health and safety of all those who may be affected by its activities and, with regards to legionellosis, the firm will ensure that any risks arising from the operation of its water services are identified and either prevented or adequately controlled.

Eversheds Sutherland will endeavour at all times to ensure it operates an effective system of water hygiene management in order to ensure compliance with regulations relating to the management of legionella bacteria and the safe supply of hot and cold water.

Any identified risks will be assessed and documented and remedial action will be implemented to ensure adequate controls are in place. Risk assessments will be reviewed regularly, at least every two years, or whenever there is reason to suspect that they are no longer valid.

Where reasonably practicable, Eversheds Sutherland will consider removing or replacing equipment or facilities that may present a risk in terms of legionellosis. Where this is not possible, suitable precautionary measures will be implemented, documented and regularly monitored to ensure the risks are minimised.

The Water Management System provides details on the type and frequency of tasks to be undertaken, along with the roles and responsibilities of named individuals and the records required.

Eversheds Sutherland will also ensure that all employees and contractors are aware of their legal responsibilities and duties to ensure that water services are adequately managed and controlled, and are competent to ensure compliance.
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Work Breaks, Environment, Equipment and Workplace Welfare

Natural breaks or pauses occur during the course of normal working practice, such as meetings, answering the telephone, photocopying or faxing. However, where DSE users are inputting large amounts of data or text without natural breaks they should use opportunities for a change of activity to prevent the onset of visual or muscular fatigue.

Eversheds Sutherland will endeavour to maintain a comfortable working environment, with ventilation that ensures a sufficient supply of fresh air. As far as is reasonably practicable, the work environment will be kept free from noxious odours and fumes. Workplaces will be maintained in a clean condition and free from accumulated waste.

Floors should be kept clear of obvious hazards that could result in slips, trips and falls, including loose carpet tiles and slippery surfaces. Where people and traffic (eg forklift trucks) share the same area, arrangements will be implemented to keep them segregated, either by floor markings and signage or physical barriers.

Facilities Management will ensure that all equipment, plant and machinery on Eversheds Sutherland premises is maintained as recommended by the manufacturer/designer. No work equipment should be used unless the necessary information, instruction and training have been given, and the correct personal protective equipment is worn. Any damaged, unsafe or malfunctioning equipment must be reported to Facilities Management, and the equipment clearly marked as faulty and removed from service until satisfactorily repaired.

Within all buildings controlled by Eversheds Sutherland, appropriate welfare arrangements will be provided and maintained in a safe and hygienic manner in accordance with the Workplace (Health, Safety and Welfare) Regulations.

Facilities Management keep records of all maintenance, inspections and examinations. Eversheds Sutherland ensures the following statutory examinations and inspections are undertaken:

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Notes

It is important for the safety of everyone that compliance with safety law is upheld by everyone at all levels across the firm. Non-compliance will be a breach of the firm’s policies and procedures and may result in disciplinary action, including dismissal. Breaches may include, but are not limited to:

- ignoring training awareness
- not attending health and safety training
- not reporting hazards
- not co-operating with health and safety investigations
- disregard for health and safety procedures
- placing self, colleagues and/or visitors in danger
- interfering with or misusing anything provided in the interests of health, safety and welfare

The policy refers to UK law and standards, which should be applied to all Eversheds Sutherland offices, unless the local standards are at a higher level.
Roles and responsibilities

Introduction

Responsibility for health and safety management is shared between Eversheds Sutherland and its people. Posters entitled “Health & Safety Law - What you should know” from the Health & Safety Executive are displayed in each office and should be read in conjunction with this policy.

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<th>Firm wide roles</th>
<th>Local office roles</th>
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Everyone has a legal duty to co-operate with the firm and our clients in all matters relating to health, safety, welfare and fire prevention.

Everyone is responsible for ensuring the health and safety of themselves and others who might be affected by their actions and for co-operating at all times on health and safety matters. In particular, they shall:

- work in a safe and healthy manner and take reasonable care of themselves and of others who may be affected by their work
- report potential hazards to the IT Service desk
- report accidents or incidents immediately to the appropriate manager or supervisor
- act to reduce health and safety risks, if safe to do so, and it is within their capability
- not interfere with or misuse anything provided in the interest of health, safety and welfare

The Chief Executive and Executive

The overall responsibility for health and safety lies with the Executive of Eversheds Sutherland. The Executive have collective responsibility for health, safety, welfare and fire prevention for all partners, employees and other persons who are affected by the firm’s actions.

The Executive shall:

- ensure that appropriate time and resources are available to permit the firm's policy objectives to be achieved
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- understand and comply with the requirements of the Health and Safety Policy, roles and responsibilities and arrangements
- ensure that the Environmental, Health and Safety Management System is effective and regularly reviewed (EHSMS)
- promote health, safety, welfare and fire prevention by appropriate inclusion on relevant meeting agendas, to foster positive attitudes and continuous improvement in safety performance
- promote the active involvement of people at all levels
- take disciplinary action when serious or continued disregard for the requirements of complying with safety legislation occur
- set a personal example in matters of health, safety, welfare and fire prevention

Senior Office Partners

Senior Office Partners are responsible for their offices and people in their office.

The Senior Office Partners will be assisted by the Environment, Health and Safety Manager, the Heads of Departments, International Operations Leads, a Facilities Representative for each office, an Environment, Health and Safety committee covering each office, Departmental Managers and all employees. However, the Senior Officer Partner cannot delegate his/her overall responsibility for health and safety.

Senior Office Partners have responsibility for coordinating the management of health, safety, welfare and fire prevention within their office for all partners, employees and other persons who are affected by the firm's actions.

Senior Office Partners shall:
- understand and comply with the requirements of the Health and Safety policy, roles and responsibilities and arrangements
- ensure that appropriate time and resources are available to permit the Firm's policy objectives to be achieved
- promote health, safety, welfare and fire prevention by inclusion on relevant health and safety meeting agendas
- take disciplinary action when appropriate if there is serious or continued disregard for the requirements of complying with safety legislation occurs
- set a personal example in matters of health, safety, welfare and fire prevention
Heads of Departments and International Operations Leads

Heads of Departments and International Operations Leads shall report to the Senior Office Partners for all health and safety matters. They are responsible for the implementation of the Health and Safety Policy and its arrangements in the firm’s buildings and operations for which they are responsible and for monitoring compliance with safety legislation contained within the Safety Management System.

Heads of Departments and International Operations Leads shall:

- ensure the implementation of the Health and Safety Policy and EHSMS within their department
- ensure where possible that hazards have been identified by the relevant competent risk assessors (recognised by knowledge, experience, training and qualifications) and that suitable risk assessments are conducted and that appropriate control measures are put in place
- ensure that safety training requirements have been identified for all employees within their department and communicated to the relevant Facilities Representative
- ensure sufficient inspections of work places and practices are carried out in accordance with a monitored programme
- ensure that safety inspections are carried out when identified as necessary by risk assessments, management, safety committee and / or safety legislation
- ensure that audit reports/safety inspection reports are reviewed by report author and Head of Department and agree any required actions
- ensure accidents are properly recorded and, where necessary, participate in the accident investigation
- ensure so far as reasonably practicable that relevant safety information is circulated and that procedures are reviewed accordingly and amended if necessary
- ensure so far as reasonably practicable that all staff under their control have received health, safety welfare and fire prevention training
- ensure that reports on safety matters for the Regional Managing Partners are prepared
- ensure that the Environment, Health and Safety Committee meetings are held on a regular basis, receive reports, review and take appropriate actions as required
- identify and propose ways of improving performance
- take necessary action when breaches of the agreed procedure or method statement have been identified
- set a personal example in matters of health, safety, welfare and fire prevention

Chief Property, Health and Safety and Sustainability Officer

The Chief Property, Health and Safety and Sustainability Officer reports to the Executive and shall:

- understand and comply with the requirements of the Health and Safety policy, roles and responsibilities and arrangements
- promote health, safety welfare and fire prevention by inclusion on all relevant health and safety meeting agendas
- ensure sufficient audits of the firm’s EHSMS are carried out throughout all offices an report findings to the Executive
- ensure so far as is reasonably practicable all buildings, premises and properties for which Eversheds Sutherland are responsible are safe, fit for purpose and meet all relevant legal requirements
- ensure where possible that the Environment, Health & Safety Manager is competent to implement the Health and Safety policy
- take disciplinary action when serious or continued disregard for the requirements of complying with safety legislation occurs
- set a personal example in matters of health, safety, welfare and fire prevention
Risk Representative

The Risk representative reports to the Executive and shall:
- ensure they are aware of the principle risks facing the business
- ensure appropriate mitigation plans are in place/governance
- monitor progress against these plans
- help prioritise resources to support the above

Environment, Health & Safety Manager

The Environment, Health & Safety Manager is appointed by and responsible to the Chief Property, Health and Safety and Sustainability Officer.

The Environment, Health & Safety Manager has specific responsibilities for health and safety and must ensure that the Executive and the Senior Office Partners are kept aware of health and safety performance in the firm and take health and safety into account in its business decisions.

The Environment, Health & Safety Manager is responsible for the implementation of the Health and Safety Policy and shall:
- ensure the Health and Safety policy and EHSMS framework is regularly reviewed, updated and implemented
- understand, comply with and implement the requirements of the Health and Safety policy and SMS throughout all of the firm’s offices
- monitor the health and safety performance of the firm and ensure accidents are appropriately investigated
- ensure so far as is reasonably practicable that all employees are made aware of the health, safety, welfare and emergency arrangements, and the requirements of EHSMS
- ensure the opportunity is given to employees to seek advice and information
- consult with employees and committee members on health and safety matters
- ensure so far as is reasonably practicable the firm's health and safety policy statement is consistent with current priorities of the firm
- immediately report significant health and safety failures to the Executive and recommend appropriate remedial action
- ensure so far as reasonably practicable that all Facilities Representatives are competent (knowledge, experience, training and qualifications) to contribute towards the Health and Safety Policy and EHSMS
- explain to the Executive any significant health and safety implications of decisions taken
- provide advice to disciplinary hearings when serious or continued disregard for complying with safety legislation occurs
- set a personal example in matters of health, safety, welfare and fire prevention
- ensure they are personally competent to carry out their health and safety duties

EHS and BC Assistant

The EHS and BC Assistant is appointed by and reports to the Environmental, Health & Safety Manager.

The EHS and BC Assistant shall:
- gather relevant health and safety data
- manage the on-line health and safety training system
- manage the Health and Safety aspects of the Environmental, Health and Safety Management System
- check the fire logs, to ensure drills and unplanned evacuations are recorded
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- place health and safety data on Insite
- order First aider training and supplies and ensure training is undertaken
- update medical conditions spreadsheet
- check to ensure that health and safety activities are undertaken, as scheduled, and documented/stored appropriately
- carry out administrative duties to support the Environment, Health and Safety Department, as required

Environment, Health & Safety Committee

The persons represented on each committee shall:
- develop and agree relevant health and safety policies and procedures
- review the firm’s accident statistics and trends and agree and implement appropriate corrective or preventative measures as appropriate
- discuss and where reasonably practicable, resolve any local issues that have been passed to the Health and Safety Committee
- monitor progress of risk assessments and implementation of corrective actions
- discuss, suggest and provide information on health, safety, welfare and environmental activities
- discuss and monitor compliance with the implementation of agreed safe systems of work
- review new or changes to existing environmental, health and safety legislation
- discuss and agree relevant training programmes to ensure that employees are fully informed of their responsibilities and are competent (knowledge, experience, training and qualifications) to undertake their duties
- consult with employees on matters which significantly affect the health, safety, welfare and the environment
- promote a healthy, safe and environmentally aware culture

First Aiders

First Aiders shall:
- ensure that they keep their certificate up to date and attend for refresher training when required
- assess a situation quickly and safely and summon appropriate help
- protect casualties and other at the scene from possible danger
- identify as soon as possible the nature of the injury/illness affecting the casualty
- give early and appropriate treatment, dealing with the most serious conditions first
- arrange for the removal of the casualty to hospital, into the care of a doctor, or to his/her home as appropriate
- remain with the casualty until appropriate care is available
- report observations to those taking over the care of the casualty
- administer only that treatment for which they have been trained
- ensure that they comply with the firm’s accident reporting procedure
- promote a safe working environment
- set a personal example in matters of health, safety, welfare and fire prevention
Floor Marshals

Floor Marshals shall:
- attend an annual floor marshal training course
- report to facilities where firefighting equipment is not in place in their local area or where means of escape are obstructed
- in the case of evacuation put on high-vis vests
- in the case of an evacuation, sweep the area of their responsibility ensuring that all individuals and visitors report to their assembly points
- during an evacuation notify the building controller at the assembly point of the status of the floor they are responsible for
- remain familiar with Personal Emergency Evacuation Plans (PEEPs)
- ensure persons covered by PEEPs are escorted from the building safety during an evacuation
- ensure during an evacuation that staff and visitors do not obstruct the highway and walkways
- ensure during an evacuation that once the all clear has been given staff make their way back safely to the building
- attend all floor marshal briefings and debriefings
- promote a safe working environment
- set a personal example in matters of health, safety, welfare and fire prevention

Office Managers (Office Managers, PGSMs, Departmental Administrators and International Operations Managers)

All Office Managers shall report to the Facilities Representative on all health and safety matters. Individuals appointed to the position of Office Manager are responsible for ensuring that the implementation of the Health and Safety policy and its arrangements within the firm's buildings and operations for which they are responsible, and for monitoring compliance with the (EHSMS).

Each Office Manager shall:
- understand and comply with the requirements of the Health and Safety Policy, roles and responsibilities and arrangements
- carry out routine safety inspections of the premises and operations as outlined in the firm's health and safety procedures in the EHSMS
- attend the Environment, Health and Safety Committee Meetings
- set a personal example in matters of health, safety, welfare and fire prevention

Facilities Representatives

(Consisting of: Facilities Managers, Assistant Facilities Managers and Facilities Representatives)

The Facilities Managers, Assistant Facilities Managers and Facilities Representatives shall report to the Environment, Health & Safety Manager for all health and safety matters. They are responsible for the implementation of the Health and Safety Policy and its arrangements within the firm's buildings and operations for which they are responsible and for monitoring compliance with the Environmental, Health and Safety Management System.

Each Facilities Representative shall:
- understand and comply with the requirements of the Health and Safety policy and EHSMS
- ensure implementation of the Health and Safety policy and the EHSMS in the areas for which they have responsibility
- ensure that adequate supervision of contractors is maintained at all workplaces for which they are responsible
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- ensure that all relevant health and safety policies and procedures are implemented and effectively communicated across their areas of responsibility
- liaise with the appropriate safety authorities on matters relating to the health, safety and welfare of all employees, contractors, visitors and members of the public
- ensure that all relevant statutory notifications have been given and all necessary statutory notices have been displayed
- ensure that a procedure is in place to record the details of all visitors and contractors in the visitors' book and that they are provided with appropriate health and safety information, i.e. fire and emergency arrangements, point of contact and the firm's relevant policies
- ensure that sufficient Floor Marshals and First Aiders have been appointed and are replaced as leave or absence occurs, and that First Aid refresher training requirements are met
- arrange Fire Drills and weekly fire alarm tests in accordance with the Fire Risk Assessment
- keep a written record of all checks, inspections, tests and fire drill procedures
- arrange for checking of electrical appliances on a regular basis, by a competent (knowledge, experience, training and qualifications) person
- regularly assess and arrange where necessary the training requirements (health, safety, welfare and fire prevention) of all people under their responsibility
- act on instructions from Heads of Department concerning health and safety training of employees and the carrying out of risk assessments
- ensure where possible that all relevant health and safety documentation is compiled and regularly reviewed and updated as required
- actively promote health, safety, welfare and fire prevention in their workplace
- promote awareness of the health and safety policies and procedures amongst employees
- attend the Environment, Health and Safety Committee meetings for their respective offices
- report all accidents, dangerous occurrences or reportable diseases to the relevant authority as describe in accident prevention and corrective actions
- maintain records of all reportable accidents and dangerous occurrences as outlined in the firm's accident reporting procedure
- carry out an accident investigation where necessary
- review safety reports compiled by safety personnel
- assist in the management of personal injury claims and provide any information needed by our insurers and/or solicitors
- advise the Environment, Health and Safety Manager of any additional needs or resources required for effective implementation of any safety requirements
- set a personal example in matters of health, safety, welfare and fire prevention

Additionally, each Facilities Representative who has responsibility for employing contractors shall:

- ensure that agreed procedure and policy for Contractor Management is implemented
- assess potential contractor's competence to undertake the work
- ensure that health and safety requirements form part of each contractor's terms and conditions
- take necessary action when breaches of the agreed procedure or method statement have been identified
Policy owner

The policy is owned by the Environment, Health and Safety Manager. Any queries or comments regarding the information contained in the document should be directed to healthandsafety@eversheds-sutherland.com

Policy approval

The document is reviewed annually by the policy owner and approved by the Executive.

<table>
<thead>
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<th>Version</th>
<th>Date revised</th>
<th>Description of changes</th>
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<td>1.0</td>
<td>18 August 2010</td>
<td>Policy produced. Approved by Bryan Hughes</td>
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<tr>
<td>2.0</td>
<td>4 November 2011</td>
<td>Amended to include a reference to contractors, setting health and safety targets, communication and raising awareness of the policy</td>
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<td>3.0</td>
<td>17 January 2012</td>
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<td>4.0</td>
<td>22 April 2013</td>
<td>Date amended</td>
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<tr>
<td>5.0</td>
<td>24 April 2014</td>
<td>Date amended (saved as a new document)</td>
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<td>6.0</td>
<td>29 April 2015</td>
<td>Date amended and rebranded</td>
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<td>7.0</td>
<td>23 September 2016</td>
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<tr>
<td>8.0</td>
<td>23 November 2016</td>
<td>Added version to the document</td>
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<tr>
<td>9.0</td>
<td>3 February 2017</td>
<td>International growth : combination name change from Eversheds to Eversheds Sutherland (International) LLP. Date amended</td>
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<td>10.0</td>
<td>9 May 2017</td>
<td>Policy signed off by Keith Froud - new Managing Partner</td>
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<td>11.0</td>
<td>1 May 2018</td>
<td>Annual review - no changes</td>
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<td>12.0</td>
<td>22 February 2019</td>
<td>Amended the commitments of the firm in line with ISO45001</td>
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<td>13.0</td>
<td>5 May 2020</td>
<td>Annual review – job titles updated</td>
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<td>25 January 2021</td>
<td>Annual review – amended homeworking and security sections</td>
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<td>15.0</td>
<td>01 February 2022</td>
<td>Annual review – added section re Blended working and minor amendments made</td>
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