

ST. MODWEN PROPERTIES PLC

COVID-19 H&S MANAGEMENT POLICY

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

Our commitments:

- We are committed to adopting and complying with all instructions issued by Government bodies in the areas that we operate.
- We will continually engage with industry bodies, our supply chain partners and other operators in our sector to obtain, share and implement good working practices under COVID-19 restrictions.
- We will ensure that our people can stay at home to undertake their work duties where they are able to do so and only work on or visit sites and other locations where no other alternative is available.
- We will provide the IT hardware, software and other equipment to allow our employees to safely carry out their duties in their home environment where they are able to do so.
- We will undertake risk assessments for people who have to work away from home to implement controls which ensure 2m social distancing, suitable and sufficient welfare facilities are available and suitable and sufficient PPE is provided where required by the risk assessment.
- We will provide adequate and suitable information, advice, instruction, and training for all our employees to ensure they are aware of the control measures and procedures put into place by St. Modwen for safe working.
- We will obtain and review all our contractors’ procedures for working under COVID-19 restrictions and ensure they are suitable and sufficient, in accordance with Government instructions and advice, prior to work on site commencing.
- We will ensure our prospective tenants or homeowners remain safe whilst viewing our premises. Our aim is to carry out viewings virtually using IT software as the first consideration. If this is not practical, viewing arrangements will be communicated in advance to the prospective tenant/buyer and all COVID-19 restrictions will be adopted for the health and safety of our employees, consultants, and prospective clients.
- We will continue to engage with our people, including those that are on furlough, to keep them briefed on the current arrangements and operational updates within St. Modwen.
- We recognise the potential strains on mental health that this uncertain period will have for our people. We are committed to ensuring that all line managers have regular contact with their team members to provide not only updates but to ‘check-in’ with them. Where any additional support is required for any employee, this will be identified, and support will be provided in collaboration with our line managers and HR representatives.
- We will ensure that any potential or confirmed employee cases of COVID-19, whether it be themselves or somebody in their household, is reported to line management and HR and that self-isolation (7-days for the person with symptoms and 14 days for the entire household) is adopted.
- We will request that our supply chain partners communicate any suspected or confirmed cases of COVID-19 to us and take any necessary measures to protect others that may have come into contact with them.
- We will ensure effective and timely consultation with employees on proposed changes to this COVID-19 management policy and will undertake a quarterly review of this policy and revise where necessary.
- We will make this policy available to relevant interested external third parties, as appropriate.

Rob Hudson CEO

COVID-19 H&S Management Policy	DOC REF:	HS-GRP-POL-003	AUTHOR(S):	R King & L Jennings
	VERSION NO:	1	APPROVER(S):	Rob Hudson (Interim CEO) & H&S Committee
	DATE OF ISSUE:	May 2020	REVIEW DATE:	May-2021

2. Risk Management Arrangements within St. Modwen:

The following tables outline the actions taken across the Group's activities to manage the Health and Safety risk to anyone affected by our operations

BUSINESS UNIT / FUNCTION	KEY RISKS COVID ₁₉	ACTIONS TAKEN/CONTROLS
Group Offices	<ul style="list-style-type: none"> • Potential for COVID-19 cases due to lack of social distancing • Inadequate cleaning and hygiene protocols • Overcrowding of offices increasing the risk • Travelling to work • Risk to mental health and wellbeing • RIDDOR reporting • HSE enforcement • Breach of COVID-19 legislation • Mental health and wellbeing • Emergency management 	<ul style="list-style-type: none"> • Risk assessments for new ways of operating • Specific COVID-19 H&S management plans developed for each office • Return to Work Working Group established • Phased approach being planned – i.e. rotating return of employees and continuing work from home as appropriate • Reinduction for all colleagues • Physical layout of offices adapted • Screens at reception and around desks • One-way systems created • Floor signage and access defined • Kitchens and canteen staggered breaks and use • Toilets and welfare facilities-controlled management of access • Enhanced cleaning regimes to be implemented • Training and awareness for all colleagues on new requirements • Consideration of vulnerable groups • Access to Employee Assistance Programme and Mental Health First Aid • Review of fire safety and first aid protocols
Industrial & Logistics / Strategic Land and Regeneration: construction activity	<ul style="list-style-type: none"> • Health risk to employees on contractors' sites • Lack of social distancing • Inadequate cleaning and hygiene protocols • Potential for COVID-19 cases • Loss of focus on other H&S risks • Risk to mental health and wellbeing • Security of sites during pause phase 	<ul style="list-style-type: none"> • Communication to supply chain contractors and consultants on compliance with Government guidelines and legislation • H&S team has reviewed all contractor arrangements for the management of COVID-19 risk and compliance to HSE/PHE/CLC requirements • Written communication to contractors on St. Modwen requirements • All contractor sites to be visited and assessed by H&S team to check compliance

BUSINESS UNIT / FUNCTION	KEY RISKS COVID19	ACTIONS TAKEN/CONTROLS
Industrial & Logistics / Strategic Land and Regeneration: property management activity	<ul style="list-style-type: none"> • Health risk to employees • Health risk to tenants on managed sites • Potential risk to the public • Lack of social distancing • Inadequate cleaning and hygiene protocols • Loss of focus on other H&S risks • Security of assets/property • Property related plant and equipment not being inspected due to lockdown restrictions • Lone working for employees • Mental health and wellbeing 	<ul style="list-style-type: none"> • Risk assessments developed • Contingency plans updated for all managed sites and assets • Return to work plans developed • Strategies being developed to manage high volume public properties, i.e. retail, multi storey car parks, Trentham Gardens – in conjunction with the H&S team • Additional PPE available for travelling employees to use • Inspections and checks of compliance on properties and assets including plant and equipment (Legionella risk, lifts etc.) • Working with key tenants providing essential services • Re-plan of access/egress and circulation routes on these sites • Access to Employee Assistance Programme and Mental Health First Aid • Review of fire safety, emergency and first aid protocols
St. Modwen Homes: sites	<ul style="list-style-type: none"> • Health risk to workforce and our employees on sites • Lack of social distancing • Travelling to site • The need for proximity working for certain tasks • Inadequate cleaning and hygiene protocols • Potential for COVID-19 cases • RIDDOR reportable • HSE Enforcement • Loss of focus on other H&S risks • Security of sites during lockdown • Risk to mental health and wellbeing 	<ul style="list-style-type: none"> • Risk assessment for new ways of operating developed • Operating procedures and visual standards developed in line with CLC guidance • Updated CP plans and site documentation • Written communications to all employees and sub-contractors • Training/briefing awareness and toolbox talks • Online H&S induction to replace face to face – 10 Golden Rules • Buddy systems for travel to site – staggered arrival/leave times and parking • Additional PPE available for travelling employees to use • COVID-19 Supervisors on each site • Physical distancing protocols - close canteens/drying rooms • Enhanced cleaning regimes – full time cleaners • Signage and information packs for each site • Permit to work process for proximity working in units/ maximum of 2 persons per unit – enhanced PPE will be used • Card system for workers in units • Stickers for tools and plant • Paperless processes for deliveries and site management • Formal COVID-19 compliance assessment undertaken by H&S team each month • Review of contractor arrangements and feedback on adequacy • Access to Employee Assistance Programme and Mental Health First Aid • Review of fire safety and first aid protocols

BUSINESS UNIT / FUNCTION	KEY RISKS COVID ₁₉	ACTIONS TAKEN/CONTROLS
St. Modwen Homes: sales and customer service	<ul style="list-style-type: none"> • Risk to customers • Health risk to workforce and our employees on sites • Lack of Social distancing • Travelling to site • Working in occupied Homes • Risk to mental health and wellbeing 	<ul style="list-style-type: none"> • Risk assessment for new ways of operating • Operating procedures and standards developed in line with BRC/PHE guidance • Updated Sales H&S Plans and site documentation • Protocols developed for operation of show home and use of marketing suites to promote and protect the health of colleagues and customers • Written communication/briefing to all colleagues • Health question set for customers visiting site by appointment • 10-point plan for working in occupied homes • Physical distancing at all times within viewing • Enhanced cleaning/sanitiser in sales complex • Provision of additional PPE for teams and customers where necessary • Soloprotect lone worker device deployed for sales teams to assist with changes to working hours • Access to Employee Assistance Programme and Mental Health First Aid • Review of fire safety and first aid protocols

3. Information

The following poster will be displayed in all workplaces. In addition, the findings of risk assessments and relevant workplace H&S procedures will be communicated to all employees.

Staying COVID-19 Secure in 2020

We confirm we have complied with the government's guidance on managing the risk of COVID-19

FIVE STEPS TO SAFER WORKING TOGETHER

- ✓ We have carried out a **COVID-19 risk assessment** and shared the results with the people who work here
- ✓ We have **cleaning, handwashing and hygiene procedures** in line with guidance
- ✓ We have taken all reasonable steps to **help people work from home**
- ✓ We have taken all reasonable steps to **maintain a 2m distance** in the workplace
- ✓ Where people cannot be 2m apart, we have done everything practical to **manage transmission risk**

Employer St.Modwen Properties Date May 2020

Who to contact: safety@stmodwen.co.uk
(or the Health and Safety Executive at www.hse.gov.uk or 0300 003 1647)