

Environmental, Health, Safety Management System, Section 1.1, SIRO EHSMS Statement

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Document Control Information

Approvals / Authorisations

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Related Documents

DOCUMENT	REFERENCE
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1. SIRO'S EHSMS CONTEXT

1.1 SIRO's Organisational Context

SIRO Ltd is a wholesale, independent, affiliated company within the wider ESB group family, which holds Safety as a Core Value.

SIRO Ltd was made possible under the ESB Acts 1927-2014 and in particular the ESB (Electronic Communications Network) Act 2014.

SIRO is a joint venture between ESB and Vodafone. ESB & Vodafone are the majority shareholders of SIRO Ltd.

SIRO was established to construct & operate a 100% fibre-to-the-building broadband network, in the Rep of Ireland.

Utilising existing electricity infrastructure (in as much as possible) on a nationwide basis to deploy fibre directly into homes and businesses, initial plans were to reach 500,000 premises in 50 towns; however, the success of the company has seen the rolling out of the fibre network to further urban and rural areas.

1.2 SIRO's H&S Context

SIRO works adjacent to, near or on, ESBN underground and overhead infrastructure in addition to construction of independent POP/POI adjacent to Distribution (HV) stations, as it designs, builds and operates its Core, Metro & Distribution wholesale network. This work may be completed while the ESBN Network is "Dead", "Energised" or "Live".

The **HSA Approved** Code of Practice (CoP) for Avoiding Danger from Overhead Electricity Lines explicitly excludes WORK – inside electrical hazard & exclusion zones, subject to written agreement of the Network owner.

The Network Access Agreement (NAA) is the written agreement between SIRO and ESBN, which grants SIRO exclusive access to parts of the ESBN Network (as set out in the NAA), to carry out "permitted work" on the ESBN Network. The Network Access Agreement (NAA) includes: the Technical Interface Document (TID) & Operational Interface Document (OID). ESBN have agreed to "Permitted Works" on the ESBN Network (OHL & UG).

All permitted work, completed by SIRO Ltd, on or near the ESBN Network, is subject to:

- SHWW Legislation & EN50110 requirements.
- ESBN Safety Rules (2006).

SIRO is the Client organisation, as defined under SHWW Act & the SHWW (Construction) Regulations in the Rep of Ireland, during fibre network construction works. The condition of the ESBN network is an external factor which SIRO manages through the Design Survey for Electrical Hazards and through the FMR process.

SIRO is classed as a COVID-19 Essential Services in the Rep of Ireland.

The Government announcements of 27/28th March 2020 designated telecoms and broadband activity as "essential services" which includes deployment, provisioning, installation, repair, maintenance services, and Data Centre operations.

Accordingly, all SIRO workers, including field workers, & SIRO contractor personnel, are permitted to move freely in the course of their duties as absolutely necessary. This is to guarantee the security and continuity of broadband communications necessary for the daily life of Irish citizens.

1.3 SIRO's Environmental Context

As SIRO are utilising existing electricity infrastructure, SIROs need to install additional or new ESN poles or underground ducting will be limited, and it is subject to the Planning & Development Regulations as amended in 2013, under a Class 31 exemption, as applicable under the ESB Acts 1927-2014 and in particular the ESB (Electronic Communications Network) Act 2014.

SIROs POP/POI construction is within the curtilage of existing HV Substations, and due to the nature and size of cabins installed are not subject to planning permission requirements. Should POP/POI require a change in the positioning, nature and size of existing HV Station compounds, the Planning & Development, and related environmental legislation, will be applied.

SIRO's design and construction are subject to aspects of WEEE, and associated, legislation.

SIRO's roll-out of Broadband Fibre does not have a significant negative impact on the environment.

The Rep of Ireland enacted the Broadband Cost Reduction Regulations (S.I. 391 of 2016) effective from 20 July 2016, which transposed most of the requirements of the Broadband Cost Reduction Directive (2014/61/EU).

This legislation was enacted to enforce measures to reduce cost of deploying high-speed electronic communications networks, and recognised that synergies across sectors may significantly reduce the need for civil works due to the deployment of electronic communications networks and therefore also the social and environmental costs linked to them.

SIRO is an environmentally friendly organisation, as SIRO's design, construction and operation of the its National Broadband Fibre roll-out is on existing ESN infrastructure in so far as reasonably practicable.

This approach has significantly reduced the environmental life-cycle impact of SIRO Ltd. SIRO have calculated that their life-cycle environmental impact was reduced by over 6,402,942 tonnes of Spoil/Fill Waste, 148,218 Concrete & 58,584 tonnes of PVC/Plastic to date by taking this approach.

SIRO do set internal management system objectives and targets as part of our accredited ISO 14001 management system, however SIRO's environmental life-cycle & waste impact could be reduced even further through the full & practical implementation of the Broadband Cost Reduction Regulations at a national level.

Embedded within the Broadband Cost Reduction legislation was the recognition that national constraints may exist which could affect the objectives of the legislation. Two of the potential areas which the Regulator may be able to influence are:

- In-Building Physical Infrastructure: Significant environmental and cost benefits may be accrued in providing mini-ducts during construction of a building, with all new buildings or buildings subject to major renovation being equipped with physical infrastructure and access points, allowing the connection of end-users with high-speed networks. In order to fulfil the vision of the Broadband legislation both the Irish Building Control Regulations & Technical Guidance Documents require updating. ComReg could participate in the Building Control reviews and consider supporting the development of "broadband ready" labels for buildings.
- Planning & Development Legislation: While the use of existing physical infrastructure is primary, on occasion the linking of these existing routes require new construction. To ease the roll-out of high-speed broadband across the country ComReg could actively participate in enhancing Section 31 exemptions of the Planning & Development legislation in order to facilitate and gain from both the cost reduction and environmental benefits of high-speed broadband. All such new construction should of

course continue to be subject to a minimum of Appropriate Assessments (screening) and construction preventative controls as per current legislation.

SIROs aspects and impacts are of a slightly higher significance during construction activity, and are generally of short-term impact.

SIROs register of Aspects and Impacts (considering the Life-Cycle of our Network) are available in EHSMS 2.3.

SIROs roll-out of Broadband Fibre will have a significant positive impact on the environment:

- Reduction in National Carbon Footprint
- Reduction in Road - usage
- Contributing to Improved Work-Life Balance
- Reduction in Pandemic risks

1.4 Relevant Interest Parties

See section 2.6 of Safety Statement below

1.5 Risks & Opportunities

See section 3 of Safety Statement below

2. OCCUPATIONAL EHSMS POLICY

2.1 Overview

This document outlines a framework for the management and improvement of Health, Safety and Environment within SIRO. SIRO is located in, The Herbert Building, The Park, Carrickmines, Dublin 18.

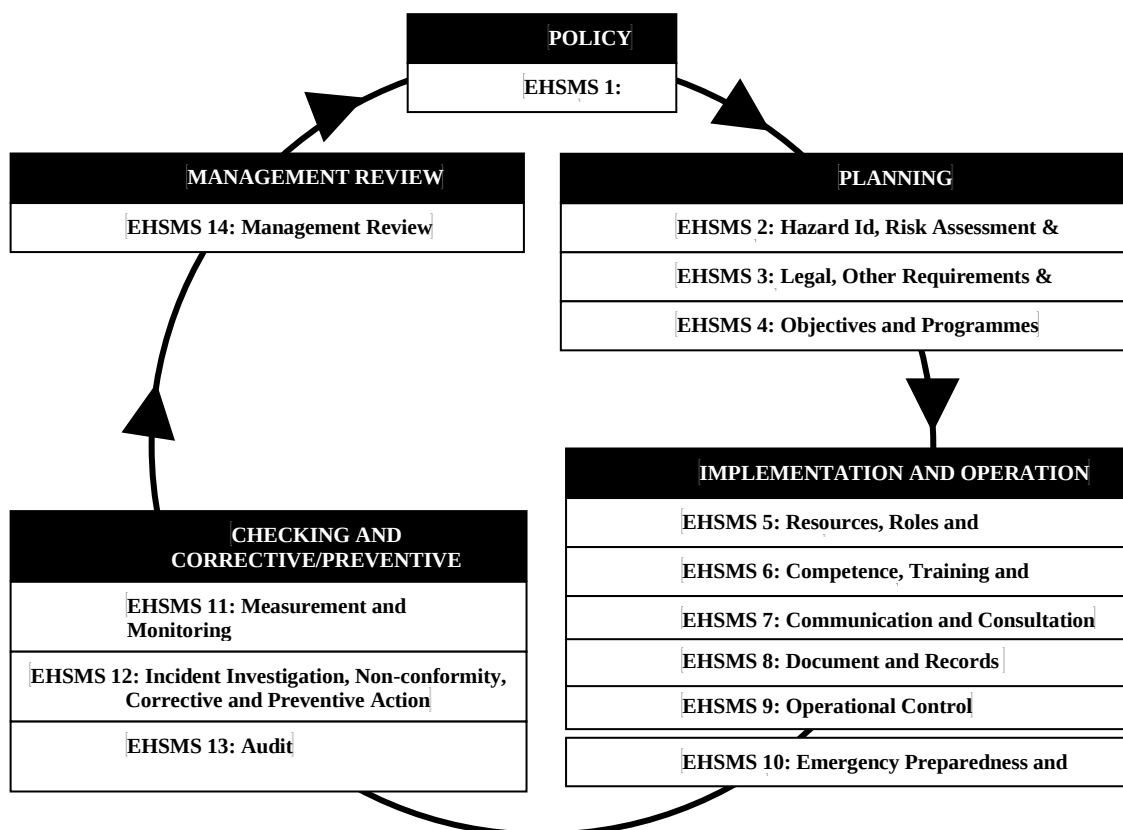
This document is supported by other safety related documents and records. The combination of these documents is referred to as the SIRO Environmental, Health, and Safety Management System (EHSMS). The EHSMS is divided into 14 sections and further subsections to reference the major HSEQ critical items.

Each Section/Folder corresponds with an item in the Environmental, Health, and Safety Management System structure shown in Figure 1 (and detailed in the Section headings of this document)

The EHSMS Statement is communicated to staff at inductions, and have access to it and updates versions through SIRO's SharePoint. . .

Section 1 of this document includes the specific Environmental, Health and Safety policy of SIRO that has been approved by the CEO, SIRO.

Environmental, Health and Safety objectives based on this policy are contained in Section 4



SIRO Environmental, Health and Safety Policy Declaration are reviewed at HSEQ Management Review Meetings (Section 14) during which any necessary action is identified and programmed.

Section 1 is supported by EHSMS 1

2.2 Activities Covered by the Environmental, Health and Safety Management System

The Environmental, Health and Safety Management System covers

- A Fibre Broadband Wholesale Utility Network Owner & Operator
- Appointment of Contractors to assist in the installed in existing or adjoining ESB infrastructure.
- Monitoring & Observing the Construction and Installation of the Fibre Optic Network.
- All other Field based activities
- Office based activities

2.3 SIRO Corporate EHSMS Policy Declaration

SIRO Environmental, Health, Safety & Welfare Policy

SIRO Ltd's central core belief and value is that effective environmental, safety, health & welfare, and quality management at work is essential to securing the success and sustainability of our business.

SIRO are fully committed to protecting the safety, health and welfare of our colleagues, contractors, the public we serve and the environment in which they live. Our belief is that unsafe acts and incidents are preventable and operational processes can be designed and operated in an inherently safe and environmentally sustainable manner. This belief guides our partnership approach to Environmental, Health, Safety Management System (EHSMS) and Quality across our business activities in our zero injuries and significant impact approaches.

SIRO promote an open and proactive environmental, safety, health and welfare culture with the involvement of relevant interested parties and our people through competence, compliance, engagement, and risk assessment. This is reinforced through strong and visible leadership and in striving to achieve and maintain our safety goals of zero injuries and significant impacts.

SIRO are aware that EHSMS, and Quality, is every individual's responsibility. Each of us has the responsibility to act immediately to prevent unsafe acts or significant impacts, and prevent foreseen unsafe conditions arising.

Employees also have clearly defined responsibilities under the Act to co-operate with management to achieve a safe place of work and to take reasonable care of themselves, others and the environment. If any task is not safe we do not expect employees to do it.

In pursuance of the general statement of the policy, SIRO shall:

- Manage and conduct all work activities in such a way as to ensure, in so far as is reasonably practicable, the environmental, safety, health and welfare at work of all who may be affected by our operations.
- Provide and maintain sustainable and safe places of work and safe systems of work,
- Provide safe means of access and egress,
- Provide and maintain safe work equipment,
- Ensure the safety and prevention of risk to environmental health at work of all employees relating to the use of any article or substance or the exposure to noise, vibration or ionising radiation or any other physical agent,

- Provide systems of work that are planned, organised, performed, maintained and revised as appropriate so as to be, in so far as is reasonably practicable, safe and without risk to health, safety & the environment,
- Carry out risk assessments and implement control measures as required,
- Protect, in so far as is reasonably practicable, persons not employed by this company who may be affected by our activities (e.g. members of the public),
- Consult employees on matters of environmental, safety, health and welfare,
- Provide such information, training and supervision as may be required to work according to the EHSMS,
- Prepare and periodically review emergency plans, designating staff with emergency duties,
- Provide and maintain adequate welfare facilities,
- Provide a competent person (incl contractors) to assist in providing for the environmental, safety, health and welfare of employees and others,
- Provide sufficient resources to achieve the proactive and preventative provisions of the Environmental, Health & Safety Management (EHSMS) and Quality Systems.

SIRO aims to exceed, relevant legal and regulatory environmental, safety, health and welfare requirements, and be an industry leader. We communicate the required standards and behaviours in a clear and unambiguous manner, with the necessary training, systems, processes and/or procedures put in place to support and continuously audit our EHSMS performance continuum, taking advantage of opportunities to improve as they are realised.

SIRO's Senior Leader Team (SLT) complete Director "Leadership" Audits of site works, and complete monthly HSEQ management reviews, as demonstration and commitment to continual improvements on EHSMS performance.

The policy shall be kept up to date, particularly as the business changes in nature and size. To ensure this, the policy shall be reviewed at least annually.

Signed on behalf of the SIRO Board of Directors


Mr. John Keane (Chief Executive Officer)
Date: 9th August, 2021



The Corporate Safety Policy Declaration is located in EHSMS Sub Section 1.3 Corporate EHSMS Policy

2.4 Requirements under Legislation

SIRO is obliged to commit to:

- 1 Providing adequate resources to ensure, so far as is reasonably practicable, the safety health and welfare of staff.
- 2 Provide adequate resources to prevent significant impacts on the environment.
- 3 Managing and conducting work in a manner that ensures, so far as is reasonably practicable, the safety health and welfare of staff and other persons at the place of work.
- 4 Preventing improper conduct during work that is likely to put the environment and safety, health or welfare of persons at risk.
- 5 The design, provision and maintenance of a place of work that is, as far as is reasonably practicable, safe and without risk to health or having significant impacts on the environment.
- 6 The design, provision and maintenance of safe means of access and egress, in so far as is reasonably practicable.
- 7 The design, provision and maintenance of plant and machinery that are, as far as is reasonably practicable, safe and without risk to health and without the chance of having a significant impact on the environment.
- 8 Ensuring, so far as is reasonably practicable, safety and preventing risk to health from any article, substance, noise, vibration, non-ionising radiation or other physical agent.
- 9 The provision of systems of work that are, as far as is reasonably practicable, safe and without risk to health or the environment.
- 10 The provision and maintenance of welfare facilities for staff.
- 11 The provision of information, instruction, training and supervision to ensure, as far as is reasonably practicable, the safety, health and welfare of staff.
- 12 The identification of hazards, the assessment of risk and the provision of appropriate control measures that take account of changing circumstances and the statutory Principles of Prevention.
- 13 The provision of suitable personal protective equipment.
- 14 The provision of emergency plans for routine and non – routine situations.
- 15 The reporting of accidents and dangerous occurrences to the statutory bodies as required by Irish Safety Legislation.
- 16 Provision of the services of competent persons to advise and assist management in securing the safety, health and welfare at work of staff.
- 17 The appointment of competent persons to ensure that construction projects are designed constructed and can be maintained safely and without risk to health and the environment.
- 18 Facilitating the selection by staff of a Safety Representative, and participation of workers in environmental, safety & health management.
- 19 Consultation with staff on matters of environment and safety, health and welfare at work through Safety Alerts, Monthly Build Manager Meetings, Quarterly Build Team meetings and the Safety Representative(s).

2.5 Relevant Interested Parties

Taking into account the needs & expectations of relevant interested parties under clause 4.2 of ISO 45001 & ISO 14001; SIRO may decide to voluntarily agree to adopt or apply requirements of our relevant interested parties. Where this occurs the requirements become a mandatory compliance element and shall be recorded in EHSMS 3: Legal and other requirements.

Interested Party, has the meaning of a: person or organisation, that can be affected by, or perceive itself to be affected by a decision or activity. These parties may be inside or outside of the workplace, however many of these interested parties are not relevant to the EHSMS operation in SIRO Ltd. Relevant Interested Parties are those parties deemed by SIRO Ltd as relevant to SIRO's EHSMS management systems.

In addition to legislative requirements, SIRO following a review of potential interested parties, have identified the following relevant interested parties:

- Irish Legislative & Enforcing Authorities
 - Local Authorities & RMO
 - Commission of Railway Regs, Iarnród Éireann & Luas
 - Health & Safety Authority (HSA)
 - Environmental Protection Agency (EPA)
 - NWPS & National Monuments
 - Gas Networks Ireland (GNI)
 - Health Services Executive (HSE) & Dept of Health
- SIRO Shareholders & Stakeholders
 - ESB Corporate
 - Vodafone Group
- SIRO Workers & Contractors
- ESNB (to the extent as indicated in the NAA, or as adopted by SIRO Ltd)
- ESBT (to the extent that access is on ESBT property or as adopted by SIRO Ltd)
- EN & ISO (Standards Bodies)

SIRO shall include relevant interested parties in Management Review Meetings agenda.

3. HAZARD IDENTIFICATION, RISK ASSESSMENT, CONTROLS & OPPORTUNITIES

3.1 Overview

Section 2 of this document cover the Processes for the identification of hazard, aspects and impacts, risk assessments, determining the controls that are put in place to control the hazard and identifying opportunities for continual improvement of our EHSMS Management Systems. It also covers the recording and communication of risk assessments.

SIRO develops its risk assessments from the experience of its shareholder companies, its employees and its competent persons. These risk assessments are continually reviewed.

Management of Environmental, Health & Safety Management System processes falls under:

- a) Legal and Other Requirements which cover control measures applying throughout SIRO
- b) A Risk Assessment Process which covers the assessment of overall risks in SIRO

Section 2 is supported by Folder EHSMS 2.

3.2 Risk Assessment Process

The main benefit of risk assessment is that it demonstrates that a comprehensive evaluation has been undertaken to identify foreseen hazards, aspects and impacts, which may result in injury, fatality, property and environmental damage. In considering the routine and non-routine events SIRO is able to determine a strategy for priority and assignment of resources to those activities giving rise to the greatest potential risk or impact.

It is policy that all works associated with SIRO operations are assessed as part of the development of systems of work to reduce the risk as low as reasonably practicable. Output from risk assessments are considered when developing strategic environmental and safety objectives. The HSEQ Team will collate any revisions to the Environmental, Health & Safety Management System (EHSMS) that may be required as a result of the outputs.

The Environmental, Health & Safety Management System (EHSMS) ensures the organisation, planning, control, monitoring and review of SIRO activities including the effectiveness of the protective and preventative measures which have been identified as a result of risk assessment

The Risk Assessment Process is available in EHSMS 2.2

3.3 Environmental Aspects and Impacts

SIRO's register of Aspects and Impacts are available in EHSMS 2.3.

3.4 EHSMS Opportunities

In the completion of Hazard & Risk Assessment, Identification of Aspects & Impacts, SIRO apply the Hierarchy of Controls is so far as is reasonably practicable.

Should business opportunities arise, which may also provide new EHSMS opportunities, on a continual basis SIRO shall endeavour to take advantage of these to improve by:

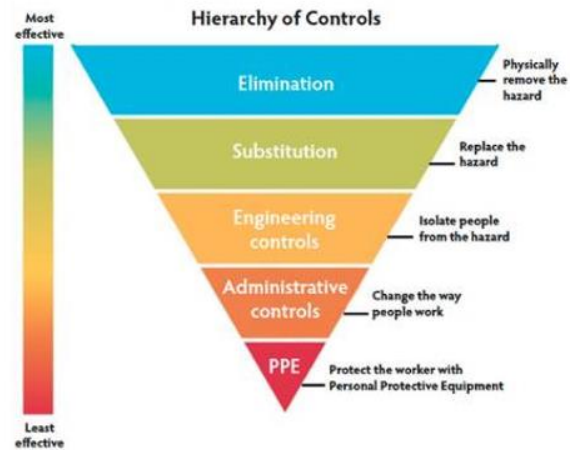
- Adapting work, work organisation and the work environment to workers
- Striving to Eliminate Hazards, and reduce risks, through the practical application of the Hierarchy of Controls
- Continually improving the EHSMS Management System.

Workers (and/or their EHSMS Representatives) and Contractors shall be consulted, as a minimum on an Annual Basis to assist in the identification of EHSMS Opportunities within SIRO Ltd,

Opportunities shall be considered when developing strategic environmental and safety objectives and shall be included on the agenda for Management Review meetings and EHSMS meetings with employee representatives.



- Hazard Identification
- Risk Assessment
- Controls & Opportunities



4. LEGAL AND OTHER REQUIRMENTS

4.1 Overview

Section 3 of the Management System covers the compliance of SIRO with regards to its Environment and Safety, Health and Welfare legislative, and other, requirements.

The Head of HSEQ (assisted by the Health & Safety Manager) as the appointed Competent Person(s), are responsible for evaluating the requirements of applicable environmental, safety, health and welfare legislation and advising management on their responsibility to ensure compliance.

To fulfil the requirements of ISO 45001 & ISO 14001 Environmental, Health and Safety Management System (EHSMS) must have a system in place to ensure it employs relevant Environmental, Health and Safety legislation, and other, requirements.

The company has a policy of commitment to compliance with applicable legal and other Environmental, Health and Safety Management requirements that relates to its organisation hazards, risk aspects and impacts. Therefore, a register of legal and other Environmental, Health and Safety Management requirements must be kept and updated regularly. Changes to the register must be communicated to the relevant people.

Records of this communication are contained in EHSMS 7

Section 3 is supported by EHSMS 3

4.2 Compliance with Legislation

SIRO maintains a register of legislation updated by HSEQ utilising

- Health and Safety Review
- Governmental Websites

See EHSMS 3.2 appendix A for the register of legislation.

The Health and Safety Manager is responsible for updating risk assessments, where required, to take into account new legislative requirements.

The Head of HSEQ is responsible for updating environmental risk assessments, where required, to take into account new legislative requirements.

The Health and Safety Manager is also be responsible for the communication of all legislative changes throughout SIRO, while the Head of HSEQ shall advise senior management of relevant requirements.

The evaluation of compliance with applicable legislation, in terms of implementation of preventive controls, is achieved through combinations of inspections, premises audits, contractor/supplier audits and ISO internal audits.
(See EHSMS Section 13).

4.3 Site Safety

SIRO employees and personal working on behalf of SIRO are required to access a number of different site types. All employees or personal entering these sites are required to comply with applicable Environmental, Safety, Health and Welfare legislation, with the requirements of SIRO Guidelines Inductions and with SIRO CMP 12 and CMP 13.

A full list of SIRO inductions can be found in Section EHSMS 6 Records.

4.4 Control of Hazardous Substances

SIRO have put in place process for contractors to follow for the control of hazardous substances on site as per CMP 12 and 13

4.5 PSDP and PSCS tracker

PSDP and PSCS Tracker in EHSMS 3.5 and VPC Tracker system.

4.6 ESB Interface Agreements & Other Requirements

A copy of the templates for mutually agreed interface agreements, and other requirements to which SIRO subscribe, can be found in EHSMS 3.6

5. OBJECTIVES AND PROGRAMMES

5.1 Overview

To fulfil the requirements of ISO 45001 & ISO 14001, the Company must ensure that it sets objectives and targets. The objectives and targets must be documented and maintained for accuracy. The Company requirement to demonstrate continual improvement and therefore monitors and measures the performance of each objective and target and ensure that the performance is documented (see SLT Monthly Management Review presentations).

SIRO's process ensures that all objectives and targets are tracked. If the programme(s) is not achieved then the reason(s) is known and recorded. The performance is monitored by SIRO through internal reviews, and external verified from a third party accredited organisation, at least annually.

To ensure that the Environmental, Health and Safety Management System (EHSMS) is transparent the objectives and targets, along with progress on achieving those objectives and targets, will be communicated both internally and externally (as relevant).

This section will look at the objectives and programmes to improve Environmental, Safety and Health across SIRO.

Section 4 is supported by Folder EHSMS 4.

5.2 Safety Objectives and Improvement Plan

SIRO objectives for improvement are identified in the SIRO SLT Monthly Management Reviews. These Improvements are designed to support the Policies of SIRO Ltd.

The Environmental, Health and Safety Improvement improvements are reviewed continually by the HSEQ department and regularly by the management team.

The Objectives and Programmes Process is located in EHSMS 4.2

6. RESOURCES, ROLES, RESPONSIBILITY, ACCOUNTABILITY AND AUTHORITY

Section 5 of this document covers the Resources, Roles, Responsibility, Accountability and Authority within SIRO, it also looks at the Responsibility of Contractors and Sub-Contractors working for or on behalf of SIRO.

Folder EHSMS 5 supports this section.

6.1 Overview

Resources include human resources and specialised skills, organisational infrastructure, technology and financial resources. As part of the EHSMS, planning and management process, competent personnel and the required support provision (i.e. plant/equipment, transport, communication etc) are identified to ensure that the occupational health and safety performance and conformity of the company operates effectively.

Roles are defined, allocating responsibilities and accountabilities, and delegating authorities, to facilitate effective Health and Safety management. These roles, responsibilities, accountabilities, and authorities shall be documented and communicated.

SIRO is responsible for managing environmental, health, safety and welfare in all premises and operations carried out by its employees, by any Agent or Contractor acting on the Group's behalf and shall include non-employees so far as is reasonably practicable. Labour only contractors shall be treated as SIRO employees for the purpose of the execution of environmental, safety, health and welfare measures, save where contract conditions indicate otherwise.

It is the responsibility of the SIRO Board of Directors to appoint a Senior Manager, or Director, with responsibility for environment, safety, health and welfare at work. The Board of Directors shall, through the SIRO CEO, appoint competent persons, to advise and monitor HSEQ on their behalf. SIRO's CEO must ensure that adequate resources are provided, to and, for environmental, safety, health and welfare at work.

Each Manager is responsible for the planning, development, implementation, monitoring and control of environmental, safety, health and welfare at work so far as it is within the scope of their work and control. They are directly responsible to the Director / Manager above them and are responsible for those working under their control.

6.2 Roles and Responsibility of Management

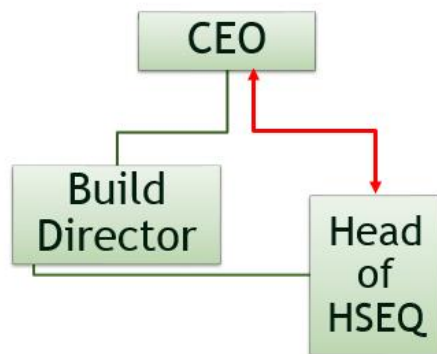
The Board of Directors hold ultimate responsibility for compliance with current Environmental, Health & Safety Legislation, for employees' welfare whilst at work, and of others who may be affected by business activities.

The Company Directors shall provide sufficient resources including human resources and specialised skills, organisational infrastructure, technology and financial resources to establish, implement, maintain and improve the Environmental, Health and Safety Management System (EHSMS).

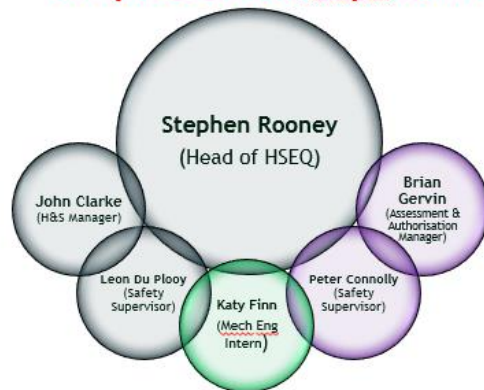
The managerial organisation structure (company organisation chart) of the SIRO is held in the company SharePoint system as an issue controlled document.

The HSEQ organisational structure overview, is as indicated below:

Delegated EHSMS Organisational Management Structure



Competent HSEQ Dept Team



The responsibility and authority for the implementation of the requirements of ISO 45001 & ISO 14001 are detailed in the relevant Processes. All employees have individual roles and responsibilities. The general responsibilities relating to the EHSMS are outlined below.

See EHSMS 5 for further detail of specific Management roles & responsibilities.

6.3 Responsibilities of Staff

SIRO employees have a duty to:

- Comply with relevant legislation, SIRO HSEQ rules and Processes.
- Take care of the environmental, safety health and welfare of themselves, of their fellow workers and other persons who may be affected by their actions or omissions at work.
- Ensure that they are not under the influence of an intoxicant to the extent that they are a danger to themselves or others.
- To co-operate with SIRO management and other persons as appropriate to facilitate compliance with relevant legislation.
- Avoid acting in a manner that endangers the environment or the safety, health or welfare of any other person.
- Attend training and undergo any necessary assessment relating to environment, safety, health or welfare.
- Make correct use of personal protective equipment, work equipment and substances that are necessary for environment, safety, health or welfare.
- Report all hazards and unsafe conditions to their line manager.
- Report all accidents and related incidents to their line manager

6.4 Responsibilities of Contractors and Sub Contractors

Operators or Contractors working for or on SIRO telecommunication infrastructure have a duty while at work to:

- Comply with relevant legislation, SIRO HSEQ rules and Processes.
- Take care of the safety health and welfare of themselves, of their sub-contractors and other persons who may be affected by their actions or omissions at work.
- Ensure that they are not under the influence of an intoxicant to the extent that they are a danger to themselves or others.
- To co-operate with SIRO management and other persons as appropriate to facilitate compliance with relevant legislation.
- Avoid acting in a manner that endangers the environment, safety, health or welfare of any other person.
- Attend training and undergo any necessary assessment relating to the environment and safety, health or welfare.

- (g) Make correct use of personal protective equipment, work equipment and substances that are necessary for environment, safety, health or welfare.
- (h) Report all hazards and unsafe conditions to SIRO.
- (i) Report all accidents and related incidents to SIRO.
- (j) Comply and co-operate with SIRO Build representatives.

6.5 Resources

A detailed listing of SIRO Resources and their responsibilities is located in EHSMS 5.

7. COMPETENCE, TRAINING AND AWARENESS

7.1 Overview

To fulfil the company's legal requirements the company must identify the individual competence requirements and provide training relevant for all personnel engaged in their work. Training requirements need to be relevant to the function and level of Personnel and to develop personnel capability.

SIRO has put in place a competency management process that is designed to ensure compliance with Legislation including the SHWW At 2005, associated regulations and other requirements, in respect of critical work adjacent to the ESNB System within the Telecoms Sector and Construction activity requirements.

This Process supports the company's management policies in the pursuance of a continuous improvement in Health and Safety, Quality and Environmental performance.

SIRO is responsible for the interpretation of ESNB Requirements, legislation, Approved Codes of Practice and standards to identify training and competency requirements relevant to SIRO activities.

Those competencies identified apply to all SIRO direct and sub-contractor employees.

Section 6 of this document covers the management of Training for working for or on behalf of SIRO. This Section is supported by Folder EHSMS 6

7.2 Management of Environmental, Health and Safety Related Training

The CEO is responsible for ensuring that the requirements of Environmental, Health and Safety Management Systems including the Competency Management System and relevant training and awareness are implemented, maintained.

The Head of HSEQ and Quality Assurance/Training Manager are responsible for maintaining Environmental Health and Safety Management Systems (EHSMS) documentation, records and ensuring the compliance of Competency Management System and that relevant training and awareness are implemented, maintained. Where requested identify training requirements of Personnel.

HSEQ Representatives/nominees are to work in accordance with all Processes relevant to their role within the EHSMS and to recommend changes to Processes. To attend the Environmental Health and Safety training and where appropriate undertake the trainer role

Responsible Manager/nominees are to work in accordance with all Processes relevant to their role within the EHSMS and for ensuring that the appropriate management arrangements are in place seeking advice from the HSEQ Department wherever necessary.

All personnel (Employees, Contractors and Sub-contractors) are to be aware of the company policies, and have a responsibility to ensure that they comply with health and safety systems, Processes and correct use of equipment provided. This responsibility extends to the safety of those who might be affected by their activities.

Trainers are to conduct a training session relevant to the level and function of attendees that fulfils the requirements of this Process.

Training records and requirements are reviewed weekly by the person responsible for training. There are two categories for responsible person: Assessment Processes & Staff Training. No HSEQ training is booked unless authorised by the Head of HSEQ or nominated person.

7.3 Records of Health and Safety Related Training

Records of safety related training for SIRO employees is maintained on the Training Register. The training register is maintained by the HR department within SIRO.

See EHSMS 6 Competence & Training Records.

7.4 SIRO Competency Approvals and Authorisations

Individual workers in SIRO are issued Competence Approvals based upon their work requirements, competence and training records. The competency approval process is carried out in accordance with the SIRO Competency Approval Process.

The SIRO Competency Process is available is EHSMS 6.2 (known as CMP 5).

7.5 Contractor Competency Approvals

All training records must be maintained by the relevant contractor for inspection by SIRO. Records of Training and Authorisations provided by SIRO are recorded on the SIRO contractor training register for information purposes only. Contractors must take responsibility for their own records and ensure that all staff working on behalf of SIRO are trained, and where relevant Authorised, to carry out their duties.

A list of all Training and Authorisations provided by SIRO is available in SharePoint EHSMS 6 Records.

8. COMMUNICATION, CONSULTATION & PARTICIPATION

8.1 Overview

To fulfil the requirements of ISO 45001 and ISO 14001 systems; information, communication and consultation both internally and externally must be outlined, the Company must establish and maintain Processes for:

- Internal communication between the various levels and functions of the organisation;
- Communication with contractors and other visitors to the workplace;
- Receiving, documenting and responding to relevant communication from external interested parties.
- Participation and consultation on matters of Environmental, Health and Safety with both workers and contractors.

SIRO recognises that effective communication and accurate information are vital to the ongoing commitment to maintaining and continually improve performance. Consultation with, and participation of, employees with regard to Environmental, Health and Safety at work is vital to SIRO's ongoing success. To help achieve this objective a HSEQ (Health and Safety) meeting/briefing structure and document control process was established which allows positive & constructive information to be channelled in either direction, both within and, outside the company.

Communication and Consultation on issues surrounding Environmental, Safety and Health are carried out through a number of means such as:

- SIRO SharePoint
- Safety Alerts and Updates
- SIRO Annual Safety Week & Workshops
- Quarterly Contractor, and Build Team, HSEQ Meetings
- PSDP Meetings
- Safety Representative(s) participation at Monthly HSEQ Dept meetings.

Section 7 is supported by EHSMS 7

8.1.1 SIRO & ESNB Interfaces

SIRO and ESNB hold periodic Management Interface Meetings.

The purpose of these meetings is to review ESNB & SIRO interactions, as per the ESB & SIRO Joint Venture Contract, Network Access Agreements (NAA) and the Operational Interface Agreements (OIA) as the two organisations share a place of work.

These meetings have Environmental, Safety, Health & Welfare divisions on the Agenda.

8.2 Safety Alerts, Cable Strike Alerts and Updates

Safety Alerts and Updates are distributed to

- SIRO Management
- SIRO Staff
- Contractors

These updates will highlight specific Safety and Health issues that affect or could potentially affect SIRO operations, its employees or contractors.

Records of Safety Alerts issued will be saved in the Health and Safety folder on the share drive in Communications.

8.3 Contractor Meetings

Due to the nature of SIRO's business four types of contractor meetings are carried out to ensure compliance with SIRO's HSEQ requirements.

Where breaches of SIRO's HSEQ Processes have occurred, additional meetings are held to investigate the breach.

A record of HSEQ Safety Meetings are held in EHSMS 7.4

8.3.1 Build Quarterly Meetings

Build Meetings are conducted on a quarterly basis. EHSMS is discussed at each meeting. The Safety Manager will participate in person or through voice conference where possible.

8.3.2 Contractor Quarterly Meetings

Group contractor meetings are held on a quarterly basis between SIRO and its contractors. New contractors appointed between quarterly meetings will be briefed on any safety issues highlighted in the previous group meeting.

Record of Safety Meetings will be saved in the Health and Safety folder on the share drive.

8.3.3 Contractor Performance Meetings

Contractor Performance meetings are held monthly and are a calibration between SIRO Safety, VPC, Build, Infrastructure, Plan and Design. Minutes of these meetings are recorded by VPC.

8.3.4 Contractor Weekly Progress/Performance Meetings

Build Management team conduct weekly progress/performance meetings with Contractors, HSEQ is also an agenda item for these meetings.

8.4 External Regulatory Bodies and Stake Holders

SIRO may consult with external regulatory bodies and stake holders where required. Minutes of these meeting are recorded where available.

8.5 Safety Representative

The Safety Representative are selected by SIRO staff in accordance with the local process, the selection of a staff safety representative will take place at least every 3 years. The main role of the Safety Representative is to represent staff on environmental, safety, health and welfare issues and to act as a focal point for consultation and participation on HSEQ.

The SIRO Safety Representative(s) should attend SIRO HSEQ Face-To-Face meetings to make representations, and participate in EHSMS development, on behalf of employees.

The Process for selecting the Staff Safety Representative is in Sub-folder EHSMS 7.6

8.6 EHSMS (Safety) Statement

The EHSMS Policy (EHSMS 1) is briefed to all SIRO staff and main contractors. This is updated at least annually and posted to SIRO SharePoint.

9. DOCUMENTATION AND RECORDS

9.1 Overview

This section covers the management of documents and records that support the SIRO Environmental Safety Management System EHSMS 1 to EHSMS 14. All EHSMS documents are controlled under the SIRO Environmental, Health & Safety Management System (EHSMS).

Safety Files are controlled through local site folders on the share drive. These folders contain all known site as-built information and are system control documents.

Other records supporting the EHSMS management system are located in administrative folders on SharePoint

Section 8 is supported by folder EHSMS 8 in either EHSMS Master Control Records, or EHSMS Management System Public (controlled) folders.

9.2 Document and Record Control Process

Please see SIRO Document Management Process (EHSMS 8.2) for the control of Environmental, Health and Safety documents and records.

10. OPERATIONAL CONTROL

10.1 Overview

This section covers the additional Processes and records that are necessary to support the requirements of;

- EHSMS 1 – Policy
- EHSMS 2 – Hazard and Risk Assessment
- EHSMS 3 – Legal and Other Requirements
- EHSMS 4 – Objectives and Improvement Programmes

Section 9 is supported by folder EHSMS 9

10.2 Contractor Approval Documents

All contractors that work on SIRO PoP sites or fibre installation sites must be approved by SIRO before commencing any works.

Contractors and their employees must have the relevant experience and satisfy SIRO that they are competent to carry out the required work.

SIRO's contractor Approval Process (EHSMS 5.6) and Extranet Approval Document is available in EHSMS 9.2

10.3 Build Management

Construction Activities undertaken on SIRO sites are done in conjunction with the Safety, Health and Welfare (Construction) Regulations SI 291 of 2013, and amendments.

Contractor build meetings are held on a weekly and monthly basis to review safety issues, build programmes, site access requests.

SIRO's build management Processes or CMP documents are located under the infrastructure folder.

10.4 MESC's, RACS's, Processes & Work Aids

SIRO have developed MESC's, RASCs, Processes and Works Aids to assist employees and contractors to carry out their duties. SIRO may also utilise Process/Procedural documents and work aids developed by ESB and ESB Telecoms. These documents are made available to employees and contractors who may work on or adjoining ESB property or infrastructure.

A number of these documents are made available on the SIRO Extranet system.

Minimum Electrical Safety Controls (MESCs) are located in EHSMS 2 Hazard & Risk Assessments

Risk Assessment Safety Controls (RASCs) are located in EHSMS 2 Hazard & Risk Assessments

10.5 Site Safety Files

SIRO Site Safety File are a collection of a number of folders located within the Site Folder on the share drive. These folders will contain relevant known information from design, construction, safety and handover to assist in the future operation and maintenance of SIRO's network.

11. EMERGENCY PREPAREDNESS AND RESPONSE

11.1 Overview

This section covers site and office emergency management within SIRO.

Section 10 is supported by EHSMS 10

11.2 Site Emergency Response Processes

Site Emergency Processes are located in EHSMS 10.2.

11.3 Office Emergency Processes

SIRO office emergency Process is can be found in EHSMS 10.3

12. MEASUREMENT AND MONITORING

12.1 Overview

This section will cover SIRO's commitment to ensure that a HSEQ review is carried out at,

- SIRO Board Meetings
- SIRO Management Meetings
- SIRO SLT Management Reviews
- SIRO Build Management Meetings
- Contractor Performance Reviews

12.2 HSEQ SLT Management Meetings

HSEQ SLT Management Meetings are held on a Monthly basis between SIRO's senior management and Head of HSEQ. These meetings are convened by the SIRO CEO and review,

- Any items arising from the previous Safety Monitoring Meeting (Sub-folder EHSMS 11.2).
- An evaluation of performance against safety objectives and the local Safety Improvement Plan (Folder EHSMS 4).
- Review of:
 - ISO internal or external audits (Sub-Folders EHSMS 13.2 & EHSMS 13.4)
 - Site Safety Inspection/Audits (Sub-folder EHSMS 13.4)
 - o Accidents (Sub-folder EHSMS 12.3) or safety related incidents (Sub-folder EHSMS 12.4).
- Significant issues arising from risk assessment (Folder EHSMS 2).
- Any necessary action arising from new Safety Alerts or Updates (Sub-folder EHSMS 7.4).
- Any follow-up items from the HSEQ Management Review Meetings (Sub-folder EHSMS 14).
- Any necessary action arising from changes to Legislation as communicated by the Health and Safety Manager or Head of HSEQ (Sub-folder EHSMS 3.2).

A record of the HSEQ SLT Management Meetings are contained in Sub-folder EHSMS 14 Records.

13. INCIDENT INVESTIGATION, NON-CONFORMITY, CORRECTIVE ACTION AND PREVENTIVE ACTION

13.1 Overview

Section 12 covers the reporting, recording and investigation of Minor Accidents, Lost Time Accidents, Reportable Accidents, Near Misses, Unsafe Conditions and Dangerous Occurrences, the identification of Non-conformity and Corrective and Preventive Actions.

All Minor Accidents, Lost Time Accidents, Reportable Accidents, Near Misses, Unsafe Conditions and Dangerous Occurrences incidents are recorded on Enviro Manager

Section 12 is supported by Folder EHSMS 12.

13.2 Non-conformity, Corrective and Preventive Action

Non-conformity is defined as any deviation from work standards, practices, processes, regulations, management system performance, etc., that could either directly or indirectly lead to injury or illness, property damage, damage to the workplace environment, or a combination of these.

All incidents are recorded; corrective, preventive actions are detailed and are tracked on Enviro Manager.

The incident is recorded by a staff member, actioned by the Safety Manager, preventive/corrective tasks are initiated by the relevant manager to a staff member or third party. All assignees have the responsibility to close out their actions. The incident is tracked and closed by the Health and Safety Manager and the Head of HSEQ.

The Safety Incident Process is held in Sub Folder EHSMS 12.2

Progress on closing out non-conformities is managed and communicated at the Safety Monitoring (face-to-face) Meetings and Management Review Meetings.

Corrective and preventive actions are reviewed through risk assessment prior to implementation.

13.3 Accident Reporting

ESB Staff and contractors shall report Minor, Lost Time and Reportable Accidents to the SIRO Safety Manager and they shall be noted on an Accident Report form, Completed forms are available in Sub-folder EHSMS 12.3

All reports shall be recorded in Enviro Manager

All Lost Time Accidents are reported to the SIRO CEO and the Senior Management Team by the SIRO Head of HSEQ or Health and Safety Manager SIRO (only if Head of HSEQ is uncontactable) within 24 hours & recorded in Enviro Manager within 48 hours.

Corrective and preventive actions arising from Minor, Lost Time and Reportable Accidents are identified, reviewed through risk assessment prior to implementation and completed.

The Accident Reporting Register is available in Enviro Manager.

Corrective/Preventive Actions arising are added to Enviro Manager

13.4 Near Misses, Unsafe Conditions and Dangerous Occurrences

Near Misses, Unsafe Conditions and Dangerous Occurrences in SIRO are reported in Enviro Manager/GeoPal.

Details are reviewed at the next Safety Monitoring Meeting.

Dangerous occurrences are reported to the Health and Safety Authority by the Safety and Health Manager or by the relevant Contractor for site-based occurrences. These Contractor Reports are copied to the SIRO Safety and Health Manager and recorded on Enviro Manager/GeoPal.

Corrective and preventive actions are recorded on Enviro Manager/GeoPal, reviewed through risk assessment prior to implementation and completed.

Corrective/Preventive Actions arising are added to Enviro Manager/GeoPal

13.5 Good Catch

A Good Catch is a situation where a worker has, by applying correct work processes, identified a hazard and acted accordingly to ensure the work was completed safely or a situation where a worker, through high safety awareness, recognised a hazard and acted to ensure the hazard was eliminated or controlled to protect themselves and others.

Good Catches in SIRO will be reported on Enviro Manager/GeoPal.

Corrective and preventive actions are recorded on Enviro Manager, reviewed through risk assessment prior to implementation and completed.

13.6 Non-Conformance Registers

SIRO will maintain Non-Conformance Registers of deviations found through Site Safety Audits (Internal Audit Safety Report) or Internal Audits (Management Review) of its EHSMS. Non-Conformances Site Safety deviations are tracked by the H&S Manager. Non-Conformances noted in Internal/external Audits shall be tracked by the Head of HSEQ.

14. AUDIT

14.1 Overview

Section 13 covers the programme of internal and external safety audits carried out as part of the SIRO Environmental, Health & Safety Management System. The primary objective of such audits is the identification of non-conformity thereby facilitating corrective/preventive action. The secondary objective is the identification of opportunities to improve SIRO's management system. Independent assurance that the SIRO Environmental, Health & Safety Management System meets the requirements of ISO 45001 and 14001 is also obtained.

Section 13 is supported by Folder EHSMS 13

14.2 External ISO and ISO Audit

Compliance with ISO 45001 and 14001 is assured by the following auditing programme:

- External re-certification audits of the SIRO Environmental, Health & Safety Management System every 3 years.
- External surveillance audits of the SIRO Environmental, Health & Safety Management System at least every 12 months.

These audits are objectively conducted by an independent ISO 45001 and/or ISO 14001 accredited auditor(s).

The results of any ISO 45001 and 14001 re-certification or surveillance audits carried out in the past 3 months are assessed at each HSEQ Monitoring Meeting (Section 11.2) during which any necessary corrective/preventive action is identified and programmed. Re-certification and surveillance audits planned for the next 3 months are also identified.

The results of ISO 45001 and 14001, re-certification or surveillance, audits carried out in the past year are assessed at Management Review Meetings (Section 14) during which any necessary corrective/preventive action are identified and programmed.

ISO certification and surveillance audits are recorded in EHSMS 13.2 Records.

14.3 Internal ISO and ISO Audit

Internal Audits of selected areas of the SIRO Environmental, Health & Safety Management System are carried out in support of the ISO 45001 and ISO 14001 re-certification and surveillance audits. These are conducted in accordance with the SIRO Internal Audit Process by persons who are independent of the work function being audited.

The scheduling of audits is prioritised based on previous risk assessments and audits. The audit completion dates are subject to change on permission or decision of the Head of HSEQ considering previously unforeseen internal or external factors. Minimum Internal Audit requirements must be met each year". These audits form part of the evaluation of compliance with legal and other requirements. Nonconformity and corrective/preventive actions are managed using Internal Audit Tracker.

The results of Internal Safety Audits carried out in the past 3 months are assessed at each HSEQ Dept meetings (Section 11.2) during which any necessary corrective/preventive action is identified and programmed.

The results of Internal Safety Audits carried out in the past year are reviewed at each Management Review Meeting and assessed Annually (Section 14) during which any necessary corrective/preventive action is identified and programmed.

The Internal Audit Process is in Sub-folder EHSMS 13.

The Internal ISO 45001 and 14001 Environmental, Health & Safety Audit Schedule is tracked at Monthly Management Review Meetings and the audit results are also contained in Audit Record folder.

14.4 Site Safety Inspection Audits

Site Safety inspection audits of activities and persons working on SIRO locations are carried out by local staff and other managers from SIRO. These audits are carried out in accordance with annual targets set by the Head of HSEQ and maintained by the Health & Safety Manager and concentrate on:

- Reinforcing good health and safety behaviour,
- Improving commitment to health & safety and best practice,
- Communicating core health and safety values.

From 7th June 2018 the GeoPal App came into operation, all safety audits are now recorded and stored in GeoPal.

It is the responsibility of the Safety and Health Manager to follow up on any actions arising and to close out the audits and input this information to the Behaviour Audit Tracker.

The Health & Safety Manager is responsible for monitoring the Site Safety Inspection Audits for close-out of local inspection Audits. The Safety and Health Manager shall track the percentage of audits carried out and their close-out status on the inspection Audit Matrix (See Section 13.4). This is reviewed at the Safety Monitoring Meetings.

The Matrix for Site Inspection Audits for SIRO is available in the EHSMS 13 Records.

The Behaviour Safety Audit Targets are monitored at Senior Management Meetings held on a monthly basis.

Findings of the Site Inspection Auditing Programme carried out are presented at Quarterly Contractor & Build Team meetings. During which any necessary corrective/preventive action related to SIRO are identified and discussed.

14.5 Contractor Compliance (Annual Management System) Audits

The Head of HSEQ or their appointed nominee will carry out Contractor compliance audits on a yearly basis with each contractor.

Each contractor will be audited against using the SIRO Audit template.

Please see [EHSMS 13 Records](#) for Contractor EHSMS Audit results.

14.6 Premise Audits

Premise audits are carried as part of Emergency Fire Drill exercises on a 6 month basis, and where there is significant changes in the premises.

During the COVID Pandemic when the office occupancy is limited to “essential” business case meetings: fire drills should be carried out within the 6 monthly period where the ratio of fire warden to workers is >5 people in the office on the date scheduled.

For “essential” Meetings, the meeting organiser shall take on the role of Fire Warden in the Office.

15. ANNUAL REVIEW

15.1 Overview

The EHSMS Management Review will determine whether the Environmental, Health & Safety Management System is operating effectively for the benefit of the company. The review will identify opportunities for improvement, corrective actions and preventive actions and to determine whether SIRO is continuing to meet its legal and other requirements.

Recognising the high risk and dynamic nature of our workplace Management Review meetings will be attended by the SLT Directors and Head of HSEQ on a monthly basis.

HSEQ Reports to the SIRO Board (Shareholders) shall be completed monthly by SIRO CEO, with a minimum 1 presentation by the Head of HSEQ per year.

Additional HSEQ presentations may be organised with the SIRO Board depending on circumstances.

15.2 EHSMS Management Review Meetings

The EHSMS Management Review shall include consideration of following inputs:

- a) the status of actions from previous management reviews;
- b) changes in external and internal issues that are relevant to the EHSMS management system, including:
 - 1) the needs and expectations of interested parties;
 - 2) legal requirements and other requirements;
 - 3) risks and opportunities;
- c) the extent to which the EHSMS policy and the EHSMS objectives have been met;
- d) information on the EHSMS performance, including trends in:
 - 1) incidents, nonconformities, corrective actions and continual improvement;
 - 2) monitoring and measurement results;
 - 3) results of evaluation of compliance with legal requirements and other requirements;
 - 4) audit results;
 - 5) consultation and participation of workers;
 - 6) risks and opportunities;
- e) adequacy of resources for maintaining an effective EHSMS management system;
- f) relevant communication(s) with interested parties;
- g) opportunities for continual improvement.

The EHSMS Management review shall include decisions related to the following outputs with regards the continuing suitability, adequacy and effectiveness of SIRO's Occupational Environmental, Health & Safety (EHSMS) system in achieving its intended outcomes;

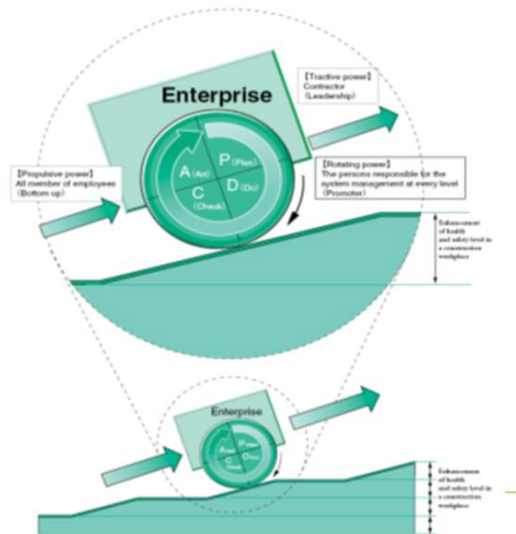
- continual improvement opportunities;
- any need for changes to the EHSMS management system;
- resources needed;
- actions, if needed;
- opportunities to improve integration of the EHSMS management system with other business processes;
- any implications for the strategic direction of the organization.

Meeting report presentation shall be circulated to all attendees and others who have actions to complete. Relevant outputs from management review shall be made available for communication and consultation.

SIRO Ltd apply continuous management system (PDCA) cycles to ensure the continual improvement of our management systems.

Management System (PDCA) Approach

- Climbing the Hill to Success



BAT NIEC Approach

Continual Improvement Cycles

– the application of Action Learning (Act, Plan, Do, Check, Review/Reconsider) Approach to Management Systems

(BEST AVAILABLE TECHNOLOGY not involving excessive cost)

SIRO Accreditations are:

- ISO 14001 (Environmental)
- ISO 45001 (Safety, Health & Welfare)

Records of the EHSMS Management Reviews are contained in Management Review EHSMS 14 Records.