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## 1. Health and Safety Policy

### Purpose

It is the purpose of this document to set out the Health and Safety Policy of the Firm as required by Section 2 (3) of the Health and Safety at Work Act.

### General Policy

It is the policy of Tony Gee and Partners LLP:

- To safeguard the health, safety and welfare of all its employees while at work, and to provide so far as is reasonably practicable a working environment in the office, on site and on operational railways, which is safe and without risk to health.
- To commit to continual improvement in management of health, safety and welfare and health and safety performance, with a defined and published programme of measurable health and safety objectives.
- To recognise its obligations to meet all relevant legislative requirements pertaining to health and safety, including the Health and Safety at Work etc Act 1974 and the Construction (Design & Management) Regulations 2015 and the relevant statutes and regulations applicable in other legal jurisdictions which apply to any of the firm's undertakings.
- To eliminate hazards and reduce occupational health and safety risks.
- To consult with workers and, where they exist, workers' representatives and encourage participation of workers in the management system.
- To organise and arrange its affairs to ensure compliance with the policy.
- To ensure that competent persons are appointed to advise on health, safety and welfare matters.
- To control, monitor and review the policy at the Management Review at intervals not exceeding 12 months and to revise as necessary in intervening periods to comply with current legislation.
- To ensure that safety training and instruction is provided for all staff, both permanent and temporary, appropriate to their task and exposure to hazards, methods and equipment.
- To ensure that all new employees receive induction training together with an assessment of training needs within three weeks of appointment.
- To commit to safe behaviours and re-educating un-safe behaviours

The LLP Members and Management are committed to the implementation of all the contents of this policy and will ensure that adequate resources so to do are made available. It is every employee and sub-contractor's responsibility to co-operate fully in the implementation of this policy and to consider it their duty to the Firm, to other employees and to the general public so to comply.

Neglect by any employee or sub-contractor regarding the Firm's Health & Safety Policy will be viewed as a serious breach of its stated aims and may result in disciplinary action being taken against such an employee or termination of the sub-contractor's contract.

The allocation of duties for Health & Safety matters and the particular arrangements that the Firm will make to implement its Policy are set out within the operational procedures contained within the Quality Management System, which is certified to ISO 9001:2015 and ISO 45001:2018.

## 2. Drugs and Alcohol Policy

### General Policy

The purpose of this policy is to reduce the potential risk to the workforce and members of the public resulting from staff working under the influence of drugs or alcohol.

The company upholds a blanket ban on the use of illegal drugs and any use of illegal drugs leads to investigation and potentially dismissal.

The company upholds a blanket ban on the consumption of alcohol or any recreational drugs during working hours.

No employee shall report for work in a state of impairment from consumption of any recreational drug or alcohol, and shall inform their line manager in the event that they may be impaired due to consumption of any legal drug taken due to medical need.

These policy requirements make no distinction between the different types of work that employees may be undertaking. Nearly all work carried out within the design office is critical to the safety of those associated with the structures being designed and nearly all staff have the potential to be within a safety critical environment with little notice and therefore are required to be free from the influence of non-medicinal drugs and alcohol at all times.

The enforcement of the Drugs and Alcohol policy is the responsibility of all staff. Particular responsibility for actions as a result of an incident either partly or completely apportioned in blame to the consumption of drugs or alcohol by an employee will be:

- Health & Safety Director
- Head of Rail

Tony Gee undertake a policy of unannounced drugs and alcohol testing for relevant staff. Any employee who tests positive for illegal drugs or alcohol levels above the specified limits will be investigated by the Health and Safety Director and Health Safety and Welfare Lead from the respective Leadership Team and will be subject to appropriate disciplinary action (including potentially dismissal) and/or rehabilitation.

Particular attention is paid to the work the company undertakes on railway infrastructure. The policy is aligned with Network Rail Company Standard NR/L2/OHS/00120 to ensure compliance with the Transport and Works Act 1992 and Railway Industry Standard RIS-8070-TOM. A minimum of 20% of total Sentinel sponsored staff will be tested on a no-notice basis per annum.

Monitoring of the safety practices of the company is the responsibility of the Health safety and Welfare Forum. The Forum acts with authority delegated from the Executive Board and Group Board. The Forum meets every two months to review safety issues including drugs and alcohol and reports to the Group Board.

At the commencement of employment each new employee attends an Induction meeting at which the Drugs and Alcohol Policy is explained as part of the Quality Management System.

The allocation of duties and the particular arrangements that the company will make to implement this policy are set out within the Drugs and Alcohol Procedure PR-HS-013. .

## 3. Driving for Work Policy

### Purpose

The purpose of this document is to set out the Health and Safety Policy of the Firm in respect of Driving for Work as required by Section 2 (3) of the Health and Safety at Work etc Act 1974. Tony Gee and Partners recognise that this is one of the most hazardous of its employees work requirements and the importance having effective management systems to control the risk of death or injury whilst driving.

### General Policy

It is the policy of Tony Gee and Partners:

To safeguard the health and safety of all employees who are required to drive motor vehicles.

To reduce the risk to health and safety by:

- Eliminating the need to travel as far as is practicable or taking steps to reduce the need.
- To encourage the use of alternative means of transport where there is a viable and practicable alternative to company or private vehicle use.
- To ensure that all employees who drive for work are competent and appropriately experienced.
- To allow ample time in work schedules for travelling so that no unnecessary pressure is applied on employees to drive too fast for road conditions or to break speed limits.
- To provide safe means of transport by way of company vehicles which are properly specified, inspected and maintained.
- To ensure, as far as is practicable that privately owned vehicles are also properly maintained

The Directors are committed to the implementation of all the contents of this policy and will ensure that adequate resources are made available. It is the responsibility of every employee who drives for work purposes to cooperate fully in the implementation of this policy.

Neglect of this Driving for Work Policy by any employee will be viewed as a serious breach of its stated aims and may result in disciplinary action being taken against such an employee.

The allocation of duties and the particular arrangements that the Firm will make to implement this policy are set out within the Firm's Driving For Work Procedure PR-HS-011.

## 4. Fatigue Management Policy

Tony Gee and Partners LLP recognise the importance of managing fatigue by providing a safe system of work and managing the hours that an individual is required to work.

All members of staff share in the responsibility to minimise and manage the adverse effects of work related fatigue.

The objective of the policy is to;

- Ensure a safe and healthy working environment free from work related injury or illness,
- Minimise the risks of persons presenting to work while impaired,
- Establish appropriate steps to manage persons who may be affected by fatigue,
- Encourage persons affected by fatigue to seek assistance from their Supervising Engineer or Project Director.

The Policy and supporting procedures apply to everyone working at or attending a Tony Gee office or site. All persons shall comply with this Policy and supporting procedures to ensure they maintain their capacity to work safely.

## Region Specific Policies

### 5. Occupational Health and Safety Policy (Canada)

The employer and senior management of Tony Gee Canada Limited (the “Company”) are vitally interested in the health and safety of the Company’s workers. Protection of workers from injury or occupational disease is a major continuing objective.

The Company will make every effort to provide a safe and healthful work environment. All employers, supervisors and workers must be dedicated to the continuing objective of reducing risk of injury.

The Company, as employer, is ultimately responsible for worker health and safety. The Company is committed to complying with its duties under the Ontario Occupational Health and Safety Act, such as taking every precaution reasonable in the circumstances for the protection of workers in the workplace.

Supervisors will be held accountable for the health and safety of workers under their supervision.

Supervisors are subject to various duties in the workplace, including the duty to ensure that any machinery and equipment are safe and that workers work in compliance with established safe work practices and procedures.

Every worker must protect their own health and safety by working in compliance with the law and with safe work practices and procedures established by the Company. Workers will receive information, training, and competent supervision in their specific work tasks to protect their health and safety.

It is in the best interest of all workplace parties to consider health and safety in every activity. Commitment to health and safety must form an integral part of this organization.

## 6. Workplace Violence Policy (Canada)

The management of Tony Gee Canada Limited (the “Company”) is committed to the prevention of workplace violence and is ultimately responsible for worker health and safety. We will take whatever steps are reasonable to protect our workers from workplace violence from all sources.

### Workplace Violence

“Workplace violence” means,

- a. the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker,
- b. an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker,
- c. a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Some examples include:

- verbally threatening to attack a worker;
- leaving threatening notes at or sending threatening e-mails to a workplace;
- shaking a fist in a worker’s face;
- wielding a weapon at work;
- hitting or trying to hit a worker;
- throwing an object at a worker;
- sexual violence against a worker;
- kicking an object the worker is standing on such as a ladder;
- trying to run down a worker using a vehicle or equipment;
- domestic violence that impacts the workplace; or
- acts that would constitute offences under the Canada Criminal Code.

### Policy on Workplace Violence

Violent behaviour in the workplace is unacceptable from anyone. This policy and program applies to all workers, supervisors, and managers of, all contractors and consultants to, and all customers of and suppliers to, the Company. Everyone is expected to uphold this policy and to work together to prevent workplace violence.

The Company’s workplace violence program includes measures and procedures to protect workers from workplace violence, a means of summoning immediate assistance, and a process for workers to report incidents or raise concerns

The Company, as employer, will ensure this policy and program are implemented and maintained. All workers and supervisors will receive appropriate information and instruction on the contents of the policy and program.

Supervisors will adhere to this policy and program. Supervisors are responsible for ensuring that measures and procedures are followed by workers and that workers have the information they need to protect themselves.



## Reporting Workplace Violence

Every worker must work in compliance with this policy and program. All workers are encouraged to raise any concerns about workplace violence and to report any violent incidents or threats. Reports of workplace violence will be promptly investigated and documented.

In the event of an emergency, building security and/or the police (dial 911) should be contacted immediately.

The Company will actively intervene at any indication of a possibly hostile or violent situation. Such intervention may include calling building security (if applicable) and/or the police.

Otherwise, if you are a victim of, or witness to, violence in the Company's workplace, please inform the Company's Managing Director immediately. If you believe that the Company's Managing Director is involved, please instead inform any trusted supervisor or manager. There will be no negative consequences for reports that are made in good faith.

## Investigation

The Company's management pledges to investigate and deal with all incidents and complaints of workplace violence in a fair and timely manner, respecting the privacy of all concerned as much as possible.

Early reporting and intervention are the most effective means of resolving actual or perceived incidents. All reported incidents will be investigated.

The complainant will be consulted as appropriate during the investigation and will be advised of the results of the investigation and the resolution, if any. Reports or incidents that should be kept confidential will be handled appropriately. Information will be disclosed to others only on a need-to know basis.

Investigations will usually involve speaking privately and individually with the following people:

- anyone who is alleged to have committed an inappropriate act;
- anyone who was targeted or harmed by an inappropriate act; and
- anyone who witnessed an inappropriate act.

Investigations may also include reviewing Company records (including emails and internet traffic logs) and speaking to health care professionals (with the patient's consent).

Within 10 days of the investigation being completed, the worker who experienced the workplace violence and the alleged offender, if he or she is a worker of the employer, will be informed in writing of the results of the investigation and any corrective action taken or that will be taken by the Company to address workplace violence.

## 7. Workplace Harassment Policy (Canada)

Tony Gee Canada Limited (the “Company”) is committed to providing a work environment in which all workers are treated with respect and dignity. Workplace harassment will not be tolerated from any person in the workplace. This policy and program therefore applies to all workers, supervisors, and managers of, as well as all contractors and consultants to, along with all customers of and suppliers to, the Company. Everyone is expected to uphold this policy and program and to work together to prevent workplace harassment.

### Workplace Harassment and Workplace Sexual Harassment

“Workplace harassment” means engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or workplace sexual harassment.

“Workplace sexual harassment” means:

- a. engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity, or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or
- b. making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant, or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Reasonable actions taken by the Company, including its managers and supervisors, relating to the management and direction of workers or the workplace is not workplace harassment.

### Policy on Workplace Harassment and Workplace Sexual Harassment

Workers are encouraged to report any incidents of workplace harassment immediately, in accordance with this policy and program.

Management will investigate and deal with all complaints or incidents of workplace harassment in a fair, respectful, and timely manner. Information provided about an incident or about a complaint will not be disclosed except as necessary to protect workers, to investigate the complaint or incident, to take corrective action, or as otherwise required by law.

Managers, supervisors, and workers are expected to adhere to this policy and will be held responsible by the Company for not following it. Workers are not to be penalized or disciplined for reporting an incident in good faith or for participating in an investigation involving workplace harassment.

## Reporting Workplace Harassment

### *A. How to report workplace harassment*

Workers can report incidents or complaints of workplace harassment verbally or in writing.

The report of the incident should include the following information:

- name(s) of the worker who has allegedly experienced workplace harassment and contact information;
- name of the alleged harasser(s), position and contact information (if known);
- names of the witness(es) (if any) or other person(s) with relevant information to provide about
- the incident and contact information (if known);
- details of what happened including date(s), frequency, and location(s) of the alleged incident(s); and
- any supporting documents the worker who complains of harassment may have in his/her possession that are relevant to the complaint.

List any documents a witness, another person, or the alleged harasser may have in their possession that are relevant to the complaint.

### *B. To whom to report workplace harassment*

The availability of the Company's reporting and investigation process should not prevent workers who believe they are being subjected to workplace harassment or workplace sexual harassment from promptly advising the offender that such behaviour is unwelcome and asking that it be discontinued.

Otherwise, an incident or a complaint of workplace harassment should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner.

Report a workplace harassment incident or complaint to the Company's Job Title. If that person is the one allegedly engaging in the workplace harassment, please instead inform any trusted supervisor or manager.

The Company will ensure that an investigation is conducted that is appropriate in the circumstances. If the incident or complaint involves the employer (e.g., owner, senior executive, director), an external person qualified to conduct a workplace harassment investigation who has knowledge of the relevant workplace harassment laws may be retained to conduct the investigation.

All incidents or complaints of workplace harassment shall be kept confidential except to the extent necessary to protect workers, to investigate the complaint or incident, to take corrective action, or otherwise as required by law.

## Investigation

### A. Commitment to investigate

The Company will ensure that an investigation appropriate in the circumstances is conducted when the Company becomes aware of an incident of workplace harassment or receives a complaint of workplace harassment.

### B. Who will investigate

The Company will determine who will conduct the investigation into the incident or complaint of workplace harassment. If the allegations of workplace harassment involve the employer (e.g., owner, senior executive, director), the investigation may be referred to an external investigator to conduct an impartial investigation.

### C. Timing of the investigation

The investigation will be completed in a timely manner and generally within 90 days or less, unless there are extenuating circumstances (e.g., illness, complex investigation) warranting a longer investigation.

### D. Investigation process

The person conducting the investigation, whether internal or external to the workplace, will at minimum complete the following:

- The investigator must ensure the investigation is kept confidential and identifying information is not disclosed unless necessary to conduct the investigation. The investigator should remind the parties of this confidentiality obligation at the beginning of the investigation.
- The investigator must thoroughly interview the worker who allegedly experienced the workplace harassment and the alleged harasser(s), if the alleged harasser is a worker of the employer. If the alleged harasser is not a worker, the investigator should make reasonable efforts to interview the alleged harasser. ☐ The alleged harasser(s) must be given the opportunity to respond to the specific allegations raised by the worker. In some circumstances, the worker who allegedly experienced the workplace harassment should be given a reasonable opportunity to reply.
- The investigator must interview any relevant witnesses employed by the Company who may be identified by either the worker who allegedly experienced the workplace harassment, the alleged harasser(s), or as necessary to conduct a thorough investigation. The investigator must make reasonable efforts to interview any relevant witnesses who are not employed by the employer if there are any identified. ☐ The investigator must collect and review any relevant documents.
- The investigator must take appropriate notes and statements during interviews with the worker who allegedly experienced workplace harassment, the alleged harasser, and any witnesses.

- The investigator must prepare a written report summarizing the steps taken during the investigation, the complaint, the allegations of the worker who allegedly experienced the workplace harassment, the response from the alleged harasser, the evidence of any witnesses, and the evidence gathered. The report must set out findings of fact and come to a conclusion about whether workplace harassment was found or not.

## *E. Results of the investigation*

Within 10 days of the investigation being completed, the worker who allegedly experienced the workplace harassment or workplace sexual harassment and the alleged harasser, if he or she is a worker of the Company, will be informed in writing of the results of the investigation and any corrective action taken or that will be taken by the Company to address workplace harassment or workplace sexual harassment.

## *F. Confidentiality*

Information about complaints and incidents shall be kept confidential to the extent possible. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect workers, to investigate the complaint or incident, to take corrective action, or otherwise as required by law.

While the investigation is ongoing, the worker who has allegedly experienced harassment, the alleged harasser(s), and any witnesses should not to discuss the incident or complaint or the investigation with each other or other workers or witnesses unless necessary to obtain advice about their rights. The investigator may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.

All records of the investigation will be kept confidential.

## *G. Handling complaints*

The Company may determine and take appropriate interim measures (e.g., temporarily reassigning one or more workers, including the complainant and/or the alleged harasser, if a worker of the Company) after a complaint of workplace harassment or workplace sexual harassment is received and during the investigation.

Depending on the outcome of the investigation, the Company will take appropriate remedial actions, which may include discipline up to and including termination of employment for just cause.

## *Record keeping*

The Company will keep records of the investigation including:

- a copy of the complaint or details about the incident;
- a record of the investigation including notes;
- a copy of the investigation report (if any);
- a summary of the results of the investigation that was provided to the worker who allegedly

- experienced the workplace harassment and the alleged harasser, if a worker of the employer;
- a copy of any corrective action taken to address the complaint or incident of workplace harassment.

All records of the investigation will be kept confidential. The investigation documents, including the report of harassment, should not be disclosed unless necessary to investigate an incident or complaint of workplace harassment, take corrective action, or otherwise as required by law.

Records will be kept for a period of one year after the investigation was completed.

Signed:



Alasdair Fowler  
Chief Executive Officer

Signed:



Jon Powell  
Managing Director (Canada)

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