



Policy on Health, Safety, Environment and Quality

We are committed to being a World Class organization, and to be the contractor of choice in our chosen markets in Asia. We believe that Quality, Safety, Efficiency and Good Value are interrelated aspects of the excellent engineering upon which the Gammon business is based.

Over all business considerations, the safety of our people will always take priority, and nothing should compromise this and our total commitment to Zero Harm.

We aim to work actively with Customers to provide added value, making best use of our abilities and resources to develop innovative solutions and manage risk such that delivery will be reliable, incident, accident and environmental occurrence free, will provide safe and healthy workplaces and will create positive change for society and the environment.

From the Executive Committee, Directors and our senior leaders, the commitment to Health, Safety, Environment and Quality (HSEQ) will continue to be highly visible, consistent and subject to regular review.

To underpin our philosophy and approach in HSEQ, we will set objectives (Zero Fatalities, Bold Commitments, Responsible Growth, Zero Waste, carbon emissions reduction targets in line with our SBTi goals) and engage with the industry and stakeholders to challenge ourselves and the trade practices to continually "raise the bar" by improving standards for health, safety, environmental and quality performance.

We will adopt the four principles of:

Strong and Visible Leadership

- Leaders will be mindful of risks and informed as to how these are being addressed.
- Leaders will maintain a fair and just culture that allows all of our stakeholders to engage in the delivery of this policy yet holds everyone accountable for their actions. Teams are resourced and competent to manage and mitigate risk.
- Leaders will adopt innovative thinking that promotes culture for implementation and continual improvement of health, safety, environmental and quality performance.
- A structured safety and quality KPI to help leaders determine the performance and continuously to drive up standards in health, safety and quality.

Structured and Risk Based Approach

- In planning of operations, we will identify the specific risks, opportunities and consider life cycle stages relevant to each task and provide safe and healthy working conditions to achieve Zero Harm; prevent work-related injury, ill health, environmental occurrence and defects of products; improve outputs and to enhance quality, effectiveness, efficiency and preserve the environment.
- We shall always consider and adopt "Safety-by-Design" approach (BIM, Digitalization, Modularization and offsite Prefabrication etc.) to reduce safety and health risks throughout project life cycle.
- Practical and resilient methods will be developed to fully control these risks, otherwise work will not proceed. To achieve this, we will adopt "Works Breakdown Structure (WBS)" and "Hold Point identification" process. In addition, methods shall be reassessed where circumstances or operational controls change.
- Strictly implement our "Dynamic Risk Assessment" process in the workplace to identify what might go wrong and to pursue every opportunity to eliminate risks.
- We will adopt data analytics, IoT, automation, modern and innovative methods of construction in our Layers of Protection to eliminate and best manage occupational health and safety risks, quality defects and environmental impacts,



- Design and Engineering
- Plant and Equipment
- Process
- People

Effective Implementation and Supervision

- Each and everyone is responsible for their own safety and the safety of those around them. Each individual is accountable for his actions and has to execute the duties diligently in relation to health, safety, environment and quality as set out in the procedures.
- Frontline staff and managers are responsible for the implementation of agreed methods.
- Compliance with legislation and contractual requirements to which Gammon subscribes is a fundamental minimum requirement.
- The Gammon HSEQ Management System procedures, Golden Rules, Bold Commitments and Safety Standards define our minimum requirements including duties and responsibilities.
- We will maintain clean and tidy work fronts, clear access to all locations and effective emergency response process.
- Should any operation depart from the requirements of this policy, managers and supervisors must stop work and institute rectification and improvement measures.
- Senior managers will regularly monitor and support their staff to ensure that all operations are being conducted in accordance with this policy.

Engagement and Communication

We will:

- Monitor the needs of our business partners and be proactive in addressing their needs.
- Enhance customer satisfaction by providing a consistently high quality of services and products that satisfy applicable legal requirements; fulfill compliance obligations; meet and exceed customers' expectations.
- Engage frequently and proactively with local communities and the industry to find ways in which we can prevent pollution; protect ecosystems; use sustainable resource; mitigate climate change; minimize impacts and add value to the quality of life of those affected by our operations when we consider different life cycle stages.
- Ensure effective participation and consultation of employees, workers and workers' representatives in the HSEQ management system.
- Provide adequate and regular training and briefing to equip and upskill our workforce with the necessary safety, health and environmental awareness and competencies to meet work requirements. Briefing to our workforce should focus on identified risks, step-by-step safe working procedures and be conducted in the workfront as priority.
- Seek continual improvement of HSEQ management system to enhance the performance through regular performance monitoring, System Assurance Validation (SAV), and by setting challenging Bold Commitments, objectives, targets and Gammon standards.

This policy, together with our management system, will be reviewed regularly and updated as appropriate to ensure continuing suitability and effectiveness.

This policy will be communicated to all staff. It will be displayed on company notice boards and available on our intranet.

Kevin O' Brien Chief Executive, Gammon Construction Limited January 2024

