GROUP POLICY

Health & Safety

DIPLOMA PLC
VALUE-ADD SOLUTIONS

Diploma PLC
Health & Safety
General Statement of Policy

The physical and mental health, safety and wellbeing of our colleagues is fundamental to our success and should be prioritised by all Diploma colleagues. Nothing is more important than keeping each other safe at work and it must be an integral part of how we work. A proactive health and safety culture requires continuous effort, awareness, commitment and action. To support this, we have set a collective Group target of zero lost time incidents.

Diploma has a duty of care to any person working at, working remotely, or visiting our operating businesses or sites. I, as Group CEO, hold ultimate responsibility for health and safety within the Group, including ensuring good governance and the provision of a safe working environment. In addition, each individual business has a responsibility to promote a strong health and safety culture, and the Managing Director of each business is fully accountable for health and safety management and performance in their business.

Colleagues across the Group are expected to take an active role in their own health and safety, and that of those around them. We must all work together, within businesses, across businesses and at Sector and Group level, to ensure that every Diploma business is a safe place to work.

Diploma's goal is to ensure the health and safety of our colleagues, visitors and partners. This policy will be kept up to date, in line with any significant changes in risk as a result of the Group's evolving activities, size, or legal/regulatory changes. As a minimum, this policy will be reviewed on an annual basis.

Johnny Thomson
Group CEO
April 2025

Contents

1 Minimum requirements

All Diploma PLC group ("Group") businesses must have a documented Health & Safety Policy and Manual (i.e. operating procedures) that reflect the specific circumstances and risk level of that business. The Health & Safety Policy must include, at minimum, the requirements below, which every business must adhere to:

Laws and Regulations

Comply with or exceed all applicable health and safety and fire laws, regulations and standards. Apply additional standards where local legislation is inadequate.

Risk Assessment

Undertake risk assessments to identify and assess all relevant risks. These should be reviewed and updated at least every two years and more often in case of significant changes, such as new equipment, change of process, or significant staff turnover. Documented measures and controls must be implemented to mitigate identified risks.

Continuous Improvement Plan

Develop an improvement plan to address areas of risk, poor performance or potential hazards and ensure the implementation of corrective actions. Improvement plans should be regularly reviewed and updated.

Diploma Group Health & Safety Standards

The six standards are mandatory health and safety requirements that must be implemented across EVERY Diploma Business / site. Details of each Standard are available on our learning management system.

Inspections

Ensure health and safety standards are achieved in practice by completing health and safety inspections and audits. This includes regular internal inspections undertaken by management and external audits undertaken by a third party.

First Aid Training

Ensure that an adequate number of staff are given formal first aid training and that suitable equipment is provided to carry out first aid duties. Appoint a person to maintain first aid equipment

Housekeeping and Cleaning

Undertake regular housekeeping, including routine cleaning and maintenance of the facility and equipment to ensure that safe conditions are maintained. Ensure workplaces remain tidy and free of unnecessary obstructions.

Remote Working Procedures

Implement procedures for colleagues working remotely/off site, such as those servicing or installing equipment on customer sites. Processes should ensure risks are assessed and managed effectively.

Suitable Working Environment

Ensure the provision of suitable working conditions, including hygiene and hand washing facilities, an area for employees to eat and rest and suitable changing facilities, if required. Additionally, businesses should consider ventilation, temperature, smoke or fumes, adequate lighting and personal protective equipment (PPE).

Training

Ensure all colleagues are trained, adequately informed and competent to do their work safely. This must include general health and safety training and training on emergency procedures, such as fire evacuation. Where appropriate, provide additional and specific training, such as safe use of equipment, handling of hazardous substances and training for off-site and higher risk work.

Communication and Engagement

Ensure all colleagues understand their business's Health & Safety Policy, rules, and work procedures which they are required to follow. These should apply to general safety, higher risk work, off-site work, and travel, including driving.

Record Keeping

Records are to be kept for risk assessments and mitigation, improvement plans, accident investigations, health and safety inspections, training and instruction, maintenance of the premises and equipment, and committee meetings.

Reporting

The Group Health & Safety reporting platform must be used for reporting all LTIs, near misses and minor injuries.

2 Governance

Group Roles & Responsibilities

The **Group CEO** is ultimately accountable for health and safety across the Group.

The **Group Sustainability Director** is responsible for defining the Group's Health & Safety Policy and driving and supporting continuous improvement across operating businesses. This includes:

- regular review of health and safety, reporting findings to the Group CEO, Sector CEO's and management,
- provide Group-wide training on key health and safety topics,
- oversee and support and investigation and reporting of serious incidents,
- lead and manage the Group's baseline audit program, and
- investigate any health and safety concerns raised, either directly or via whistleblowing or a grievance.

The **Managing Directors** of operating businesses are fully accountable for health and safety in their business.

All **line managers** must ensure health and safety is a priority within their area of responsibility.

Other Key Roles or Groups

In addition to the responsibilities of the leadership and line management, every business should ensure the following is in place to support implementation of this Policy:

- A **Competent Health & Safety Manager/Lead** responsible for health and safety management.
- A **Health & Safety Committee** to ensure oversight and effective management of health and safety. It should be chaired by the Managing Director, include the Health & Safety Manager/Leader, colleague/workforce representatives and other relevant members of the business, meeting on a regular basis.

3 Reporting

All businesses are required to report the following health and safety data on a monthly basis:

- total LTIs
- total minor injuries
- total near misses
- total potential hazards
- total working time lost due to LTIs (in full and half days)
- commentary

4 Incident Management

All health and safety incidents to be swiftly reported to the business Health & Safety Lead and accurately documented. All incidents should be analysed, root causes identified, with measures put in place to prevent recurrence, including disciplinary action (if appropriate); this should be documented in the Health & Safety reporting platform.

Immediate Reporting Requirements

The following must be reported **immediately (same day) and in writing** by the MD to the Sector CEO, Group CEO, Group Sustainability Director and Group HR Director:

- deaths
- any injury that requires hospitalisation

The following must be **reported in writing within 24hrs** by the MD to the Sector CEO, Group CEO, Group Sustainability Director and Group HR Director:

- LTIs
- other injuries which may not be "classified" as LTIs e.g.:
    - injuries to contractors working at a Diploma facility, or
    - injuries relating to non-operational activities, such as vendor events or Diploma social events.

Internal reporting procedures must be adhered to, along with applicable local laws. Where required, incidents must be reported to the local governmental enforcement body in the required manner.

5 Contacts

Any queries please contact the Group Sustainability Team:
Sustainability@diplomaplc.com

6 Definitions

Lost Time Incident (LTI)

An injury that arises out of, or in connection with, work activities occurring on site or whilst driving and results in the injured employee or contractor being absent from work for at least one whole day or one shift. ("Site" is defined as anywhere a Diploma colleague or person contracted by Diploma is carrying out work. This includes Diploma-operated sites and customer work sites).

Examples of lost time include time off to recover from the incident, time where modified work duties are assigned; or time lost for off-site treatment (e.g. physiotherapy) – beyond the day of the injury itself. LTI records must include total working days lost as a result of the incident, beginning the day after the incident occurred. It does not include incidents that occur when travelling to and from work.

Minor injury

An incident in which an injury occurs but does not result in any lost time beyond the day on which the incident occurred. Examples of minor injuries may include trips, slips or minor cuts.

Near miss

An event or situation that could have resulted in injury, but did not do so due to chance, corrective action and/or timely intervention. Examples of near misses may include a car accident resulting in no injury, a pallet falling from height but causing no injury.

Potential hazard

Any situation that has the potential to increase health and safety risk or cause an injury, illness or damage. Examples may include but are not limited to a wet floor with no sign, damaged PPE, a propped-open fire door.

Internal Management Inspections

Inspections undertaken by line managers, specifically to review whether safety standards are being achieved in practice; they should be undertaken at least monthly.

External Audits

External health and safety audits are to be conducted across all businesses on a regular basis to ensure a consistent approach across the Group and support businesses in developing improvement plans.

Document Control

Policy owner:	Group Sustainability Director
Published / effective from:	May 2025
Review frequency:	Annual
Next review date:	May 2026
Version:	4.0