



## HEALTH & SAFETY POLICY

**Applicable to** Curllew Capital Ltd, its subsidiaries, and all funds under its management (collectively, "Curllew").

**Effective Date:** January 2026

**Approved by:** Chief Executive Officer and Board of Directors

### 1. Introduction

Curllew fully accepts the obligations placed upon it by the various Acts of Parliament covering health and safety. The Company requires its Chief Executive to ensure that the following policy is implemented.

This policy has been prepared and published under the requirements of Health & Safety at Work legislation. The purpose of the policy is to establish general standards for health and safety at work and to distribute responsibility for their achievement to all managers, supervisors, and other employees through the normal line management processes.

### 2. Management Responsibilities

The Chief Executive Officer has overall responsibility for the implementation of the Company's policy. In particular, he is responsible for ensuring that the policy is widely communicated and that its effectiveness is monitored.

Directors and Senior Managers are wholly accountable to the Chief Executive for the implementation and monitoring of the policy within the area of their specified responsibility.

The Safety Officer is a manager or Director nominated from time to time with responsibility for coordinating effective health and safety policies and controls across the organisation.

The Safety Officer is responsible for:

- the production and maintenance of the Company's policy and ensuring that Department Guidelines are consistent with policy.
- its application.
- monitoring and reporting on the effectiveness of the policy.
- the identification of health and safety training needs.
- Acting on behalf of the Chief Executive, as the Company's formal link with the Health and Safety Executive, Environment Health Departments and other external agencies as required.
- the production and maintenance of Health and Safety Codes of Practice for each aspect of the services within the Company if appropriate.



### 3. Health And Safety Management Process

The Company believes that consideration of the health, safety and welfare of staff is an integral part of the management process. The provision of the Health and Safety at Work etc Act, associated Codes of Practice and E.C. Directives will be adopted as required standards within the Company.

The Company requires managers to approach health and safety in a systematic way, by identifying hazards and problems, planning improvements, taking executive action and monitoring results so that the majority of health and safety needs will be met.

If unpredictable health and safety issues arise during the year, the Chief Executive must assess the degree of risk, in deciding the necessary resources and actions to commit to addressing these issues.

### 4. Health, Safety And Welfare Guidelines

The Company has produced appropriate health and safety policies and guidelines. These embody the minimum standards for health and safety for the Company. It shall be the responsibility of the Safety Officer to bring to the attention of all members of his or her staff, the provisions of the guidelines, and updating such guidelines.

### 5. Identification Of Health And Safety Hazards

It is the policy of the Company to require a thorough examination of health and safety performance against established standards, at least annually. The technique to be adopted for such examinations will be the 'Safety Audit'. The Audit requires a review of:

- standards laid down in the policy.
- departmental guidelines.
- relevant regulations.
- environmental factors.
- staff attitudes.
- staff instructions.
- methods of work.
- contingency plans.
- recording and provision of information about accidents and hazards and the assessment of risk.

The information obtained by the Audit will be used to form the basis of the plan for the company for the following year. Audits must be completed by October of each year for the previous reporting period (September to August).



## 6. Training

Health and Safety training shall be incorporated within annual training programmes, as part of the development of a systematic training plan. Health and Safety training needs will, therefore, be identified and planned for in the same manner as other training needs.

## 7. First Aid

It is the policy of the Company to make provision for First Aid and the training of 'First Aiders' in accordance with the First Aid Regulations (1982). The Safety Officer is responsible for ensuring the Regulations are implemented and for identifying training needs.

## 8. Fire

The Chief Executive is responsible for ensuring that the staff receive adequate fire training, and that nominated fire officers are designated in all Company premises. The Chief Executive delegates these responsibilities to the appropriate Director who will be responsible for nominating a Fire Officer.

## 9. Lifting And Handling

Managers are responsible for informing staff of safe lifting techniques. The relevant Director will identify any specific training needs required and will ensure training in lifting and handling is provided to staff who require it.

## 10. Non-Smoking On Company Premises

The Company has agreed that there will be no smoking on its premises. The overall aim is to reduce smoking and so save life, reduce risk of fire and nuisance to co-workers, prevent unnecessary illness and chronic disability.

## 11. Computer Installations And Visual Display Units

All new computer installations must adhere to the British Standard Specifications and comply with the Health and Safety (Display Screen Equipment) Regulations 1992 as updated from time to time.

## 12. Control Of Working Time

The Company is committed to the principles of the Working Time Regulations. No member of staff is expected to work more than 48 hours per week (including



overtime) unless there are exceptional circumstances. Similarly, all other requirements of the regulations e.g. in relation to breaks etc. will be complied with.

### 13. Health And Safety And The Individual Employee

The Health and Safety at Work Act requires each employee 'to take reasonable care for the Health and Safety of himself and of other persons who may be affected by their acts and omissions' and co-operate with management to enable management to carry out their responsibilities under the Act. Employees have equal responsibility with the Company for Health and Safety at Work.

The refusal of any employee to meet their obligations will be regarded as a matter to be dealt with under the Disciplinary Procedure. In normal circumstances counselling of the employee should be sufficient. With a continuing problem, or where an employee leaves himself or other employees open to risk or injury, it may be necessary to implement the formal stages of the Disciplinary Procedure.

### 14. People Working On Company Premises Not Employed By The Company

Persons working in the Company premises who are employed by other organisations are expected to follow Company Health and Safety Policies regarding the safety of Company employees, their own personal safety (and that of other parties such as the public if appropriate) and their method of work. This responsibility will be included in contracts or working arrangements. Similarly, seconded Company employees working in other host premises will be expected to follow the host employers Health and Safety Policy.

### 15. Visitors And Members Of The Public

The Company wishes to ensure that as far as is reasonably practicable, the Health, Safety and Welfare of visitors to Company establishments will be of the highest standard.

Any member of staff who notices persons acting in a way which would endanger other staff, should normally inform their Head of Department. If the danger is immediate, common sense must be used to give warning, call for assistance or give aid as necessary. It is equally important not to overreact to a situation.

### 16. Approval

Approved by: Charlie Oliver  
Chief Executive Officer  
Curlew Capital Ltd

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