

Phoenix Energy Holdings Ltd

Health & Safety Policy

May 2025

Policy Authorisation:

Policy raised by:

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HEALTH & SAFETY STATEMENT

Phoenix Energy Holdings Group

Chief Executive Officers Statement

In support of the fundamental business goal of running a successful gas distribution business, Phoenix Energy Holdings Group and its subsidiaries ("The Group") are fully committed to achieving high standards of performance in safeguarding the health and safety of employees and minimising the risk to the public of our activities.

Safety is integral in everything we do whether it's the safety of our workers, contractors working on our behalf, customers or the general public.

Specifically we will:

- Provide adequate control of the health and safety risks arising from our work activities;
- Consult and communicate with our employees on matters affecting their health and safety;
- Provide and maintain safe plant and equipment and ensure the safe handling and use of substances;
- Provide information instruction and supervision for workers ensuring all are competent to perform their tasks, and to give them adequate training;
- Prevent accidents and cases of work-related ill health;
- Maintain safe and healthy working conditions;
- Review the performance and standards of health and safety across the business with identified improvements utilised to set goals for attaining continuous improvement.
- Review and revise this policy as necessary at regular intervals, at least annually.

We are committed in ensuring the safe construction, operation and integrity of our gas distribution network. The company will establish specific Health & Safety Targets & Objectives which will be measured using Key Performance Indicators (KPI's) which will facilitate our drive to continuous improvement.

The organisation and arrangements to implement the policy specifies responsibilities and guidance relating to health and safety for all employees and is detailed throughout our Integrated Management System which has been assessed and certificated against the requirements of ISO45001:2018. The Company will ensure that the necessary resources are devoted to meeting our objectives.

An excellent health and safety record is a positive business investment for us. This policy outlines the main responsibilities and organisational arrangements within the Group to achieve this.

Kailash Chada
GROUP CHIEF EXECUTIVE OFFICER

1.0 INTRODUCTION

The Company takes the health, safety and welfare of its workers, employees, contractors, users, community and supply chain who are affected by its activities extremely seriously.

It is our policy to ensure the safety and integrity of our gas distribution network and that a safe and healthy working environment is provided to all workers.

This will be implemented by ensuring compliance with all legal obligations and where possible striving for “best practice” across the Group.

2.0 PURPOSE

To outline PEH’s overall statement with regard to the management of Health and Safety, to define both management and employee’s responsibilities and the arrangements in place to successfully manage Health and Safety.

3.0 SCOPE

This policy applies to all employees of Phoenix Energy Holdings Group and its subsidiaries (“The Group”).

Companies within Phoenix Energy Holdings:

- Phoenix Energy Ltd is responsible for the construction and safe operation of the gas Distribution network within its licenced area.
- Phoenix Energy Services Ltd provide servicing and maintenance services to the home heating market within Northern Ireland. They also provide emergency response and asset maintenance services to Phoenix Energy.

4.0 REFERENCES

- Health and Safety at Work Order (Northern Ireland) 1978
- ENGA 22 PEHL Asset Management System Overview
- ASHES HSE Management System

5.0 DEFINITIONS

Worker: person performing work or work-related activities that are under the control of the organisation.

Contractors: any individual, company or organisation, other than an employee, engaged by the Phoenix Group to carry out any work for gain or reward.

6.0 POLICY

6.1 Policy

Specifically the Group will have in place and maintain systems to achieve the following principles:

- Compliance with all relevant legislation, appropriate codes of practice and any other safety related requirement applicable to our business.
- Assess the Health and Safety risks of our activities, policies, programmes, and plans and ensure the implementation of effective controls where appropriate.
- Provide adequate resources to fully implement, maintain and develop an effective and externally accredited health and safety management system throughout the Group.
- Foster an understanding of health and safety issues relating to its business activities among employees, suppliers, customers, stakeholders and communities local to its operations and seek to understand and take account of their concerns.
- **Health and Safety: Workers**
Provide and maintain a working environment for workers that is safe and without risk of injury and ill health and will provide adequate facilities and arrangements for workers whilst at work.
Ensure that appropriate instruction, training and supervision, is available to meet individual responsibilities and needs.
Require workers working on behalf of the business to meet legal statutory requirements and to work to company standards, to work safely and with due consideration for the health and safety of themselves and others.
- **Health and safety: Contractors**
To ensure all Contractors working on behalf of the group are appropriately selected, managed and monitored in relation to the health and safety management aspects of all works undertaken.
Require contractors working on behalf of the business to meet legal statutory requirements and to work to company standards, to work safely and with due consideration for the health and safety of themselves and others.
- **Health and Safety: Community**
To ensure that the health and safety aspects of the communities in which the Group operates are not negatively affected by its operations or activities. To establish effective lines of communication with internal and external bodies regarding all areas of health and safety.
- **Health and Safety: Users**
To ensure that the Phoenix Energy Group constructs, operates and maintains a safe gas distribution network that can be safely used by all parties connected to the network.

- **Health and Safety: Supply Chain**

To ensure that all services procured through the supply chain (be it supply of labour, services or products) are supplied in accordance with all relevant legislative requirements.

- The Group is committed to continual improvement and will set itself health and safety related targets and objectives covering all aspects of its operations. These will be monitored, reviewed and amended when necessary to ensure an effective process of continual improvement.

The Group will implement, maintain and review this policy (at least annually) and ensure that it is communicated to all workers and contractors. The policy will also be made available to any other interested parties.

6.2 Duties & Responsibilities

6.2.1 Chief Executive Officer and Non-Executive board.

The Chief Executive Officer is responsible, through the Executive Management Team (EMT), for ensuring that adequate organisation and arrangements exist for the effective implementation of the policy and for compliance with statutory requirements and best practice. The CEO is responsible for giving clear visibility of Health and Safety Leadership. The Non-Executive Board members shall act as scrutineers, ensuring the processes to support Health and Safety risks are robust.

Responsibilities of the Executive Management Team (EMT)

- The EMT set targets and objectives as appropriate and ensures adequate resources are available to meet health and safety objectives and the implementation of this policy.
- The EMT actively promotes health and safety issues and ensures that performance is measured and regularly reviewed at board and Senior Management meetings.
- The EMT or their designates ensure that details of any accident, incident or near miss are reported at the earliest opportunity.
- The EMT is to ensure all incidents are fully investigated and any lessons learned are identified, communicated and recommendations implemented through the Senior Management team.
- The EMT ensures that employees or their representatives are involved in decisions that affect their health and safety.

Director of Engineering

Whilst all the EMT within the group have clear Health and Safety responsibilities, the Phoenix Director of Engineering is the member of the EMT with specific responsibilities for Health and Safety.

In addition to the above responsibilities of all directors, the Director of Engineering will also be responsible for;

- Ensuring Health and Safety appears on every board meeting agenda and report to the board on all Health and Safety Matters.
- Act as a champion for Health and Safety at board level.
- Ensuring Health and Safety management systems and performance are reviewed on a regular basis.
- Ensuring the health and safety policy is developed, implemented and monitored.
- Ensuring all key HSE Forums and meetings take place.
- Ensuring adequate resources are made available to allow the effective management of Health and Safety.

6.2.2 Responsibilities of Managers and Supervisors

Management of Health and Safety is a prime responsibility of all levels of management and shall be an integral part of all business processes. As Managers and Supervisors they must;

- Understand and comply with the requirements of the Group's health and safety related policies and the Group ASHES management system.
- Communicate and implement the policy within their area of responsibility.
- Ensure they are familiar with the issues and the legal requirements relevant to your area of work and understand the risks of the operations and activities for which you are responsible.
- Minimise risks, by risk assessing the work activities you control and take measures commensurate with the level that the risk demands. Involve staff that will be completing the works in the risk assessment process to facilitate and encourage ownership.
- Promote safe working practices with all employees and lead by example in relation to HSE issues.
- Promote open communication and consultation of HSE issues with all workers and encourage their involvement.
- Ensure that all work is properly planned and resourced, that appropriate controls are implemented and that relevant personnel are consulted, adequately instructed, trained and competent.
- Ensure that in-house health and safety inspections, audits or reviews, where relevant, are carried out and that any corrective actions are taken.

- Ensure all accidents and incidents, including “near misses”, are reported promptly, investigated, lessons learnt identified, communicated to all workers and any associated recommendations implemented.

6.2.3 Responsibilities of all Workers

All workers have a duty to co-operate in ensuring that their workplace is safe for everyone who might be affected by their actions, and to take reasonable care not to do anything which might endanger either themselves or others.

- Be familiar with the workplace health and safety arrangements and safe systems of work that apply to their work, and work according to the groups safe systems of work and operational controls at all times.
- Report any accidents and “near misses” experienced when working as soon as possible to the relevant Manager or Supervisor. This includes the need to immediately withdraw themselves or their colleagues from any situations, which are perceived to be potentially unsafe, to a safe location, and reporting the situation immediately to a Line Manager.
- Must not knowingly act in a way in which may cause either themselves or the Company to be in breach of the law.

6.2.4 Health, Safety and Environmental Manager

HSE Manager’s responsibilities are as follows;

- Advise the Director of Engineering, the EMT and the CEO on policy formation and strategy programme for Health and Safety management.
- Advise the Director of Engineering, the EMT and the CEO of proposed changes to statutory health and safety legislation and the implications of same.
- Maintain an up-to-date portfolio of specialist advice and information on techniques to assist the business processes and achieve compliance with legislation and the Group health and safety policy.
- Lead by example in relation to HSE issues at all times, whilst encouraging active involvement in all areas of the health and safety management system.
- Promote safe working practices with all employees and lead by example in relation to HSE issues.
- Shall ensure all key HSE meetings are conducted.
- Ensure a suitable HSE Management system is implemented, maintained and reviewed.
- Advise and support Group managers in fulfilling their Health and Safety Responsibilities.

- Maintain contacts with Regulators, Legislators, other companies and organisations to influence developments in safety legislation and monitor comparative performance.
- Communicate effectively health and safety issues and information throughout Group and to external bodies as appropriate.
- Investigate all incidents, accidents and near misses in conjunction with relevant senior managers.
- Report to the management team on HSE performance.

6.2.5 Organisation

The Group Chief Executive Officer has overall responsibility for health and safety management.

The responsibility for health and safety is clearly allocated to senior management, line management and supervisors who are fully committed to achieving continuous improvement and to leading by example.

Executive Management Team Structure

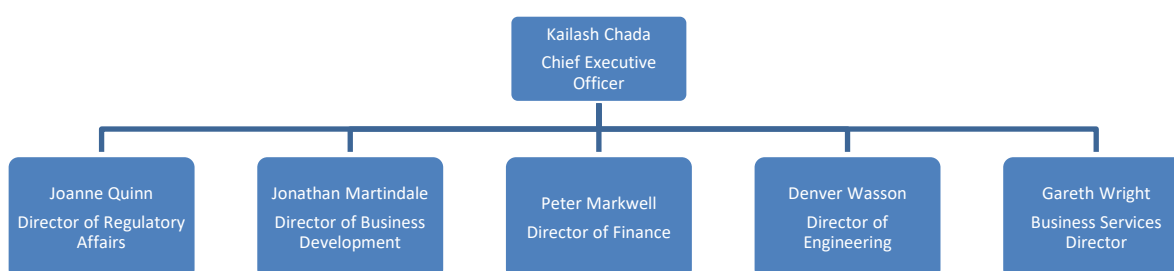


Fig. 1 PEHL Executive Management Team Structure and line of responsibility.

Director of Engineering Structure

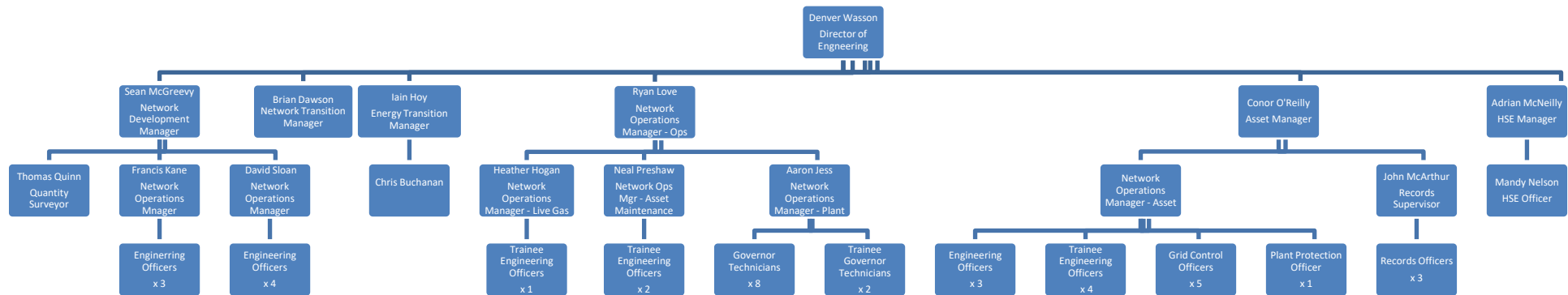


Fig. 2 Director of Engineering's Structure and line of responsibility.

PEHL have defined, documented and communicated roles and responsibilities in order to facilitate an effective HSE management system. The need for sufficient and adequate resources is reviewed at management meetings and addressed where necessary.

The HSE manager is the management representative for Health, Safety and the Environment and reports directly to the Director of Engineering. The Director of Engineering reports to the Group Chief Executive Officer

6.3 Arrangements

The Group will develop, maintain and improve a positive health and safety culture through senior management by: -

Ensuring the effective operation of the Health, Safety and Environment Management System. The Awareness of Health, Safety and Environmental Systems (ASHES) Manual shall contain all Health, Safety and Environmental operating procedures. These procedures shall be communicated to relevant managers and workers, audited at scheduled intervals and revised where appropriate.

- Ensuring, where necessary, risk assessments have been completed assessing the risks arising from activities, adequate control measures implemented and risk assessments reviewed on a regular basis.
- Ensuring that employees are consulted where appropriate, competent and adequately trained to carry out the duties assigned to them.
- Implementing measures, reviewing and auditing systems to monitor the achievement of performance standards against compliance with legislation, company policy, best practice and Key Performance Indicators.
- Ensuring systems are in place for the reporting and investigation of accidents, incidents and “near misses”.
- Having arrangements in place to assess the performance of contractors carrying out work on the Group’s behalf.

The Group has implemented Policies and Procedures as part of the ASHES HSE Management system to address specific Health and Safety areas.

Such topics include but are not limited to emergency response, first aid, occupational health, electrical safety, asbestos, Display Screen Equipment and confined spaces. Details of these can be found within the ASHES HSE Management System Road Map.

Operational Control and Managing Risk

Phoenix Energy Holdings have developed operational control procedures (as shown in fig.3) however it is recognised that a portion of Phoenix significant risks and environmental impacts arise during the construction of the natural gas distribution network.

As part of the awarded Distribution Contract, the appointed Construction Contractor is therefore required to have adequate operational control procedures in place. Phoenix ensure the adequacy of such procedures via internal audits, inspections and independent audit.

The Construction Design Management Regulations (Northern Ireland) 2016 define how The Group shall manage the Distribution Construction Contract and underpins how we actively manage our appointed contractor as well as other contractors who complete works on behalf of the Group.

Alongside HSE management procedures a suite of Engineering and other operational Procedures exist. These are prepared and implemented to ensure the safe design, construction, operation and maintenance of the Natural Gas Distribution Network. These procedures include compliance with Pressure Systems Safety Regulations (NI) 2004 and Dangerous Substances Explosive Atmospheres (Northern Ireland) 2003.

Industry Specific Legislation

Within the gas Industry, compliance with industry specific Health and Safety legislation is required.

The Gas Safety (Management Regulations) (Northern Ireland) 1997 require Phoenix Energy, as a Network Operator, to have prepared and accepted by HSENI a Distribution Safety Case prior to gas flowing within the Network.

The Pipeline Safety Regulations (Northern Ireland) 1997 define how pipelines are designed, constructed and operated safely.

The Gas Safety (Installation and Use) Regulations (Northern Ireland) 2004 defines the responsibilities of individuals carrying out any work on a gas installation from the Emergency Control Valve to the appliance. This will include those individuals who install, service, maintain or repair gas appliances and other gas fittings. Phoenix Energy and Phoenix Energy Services have defined responsibilities within this legislation.

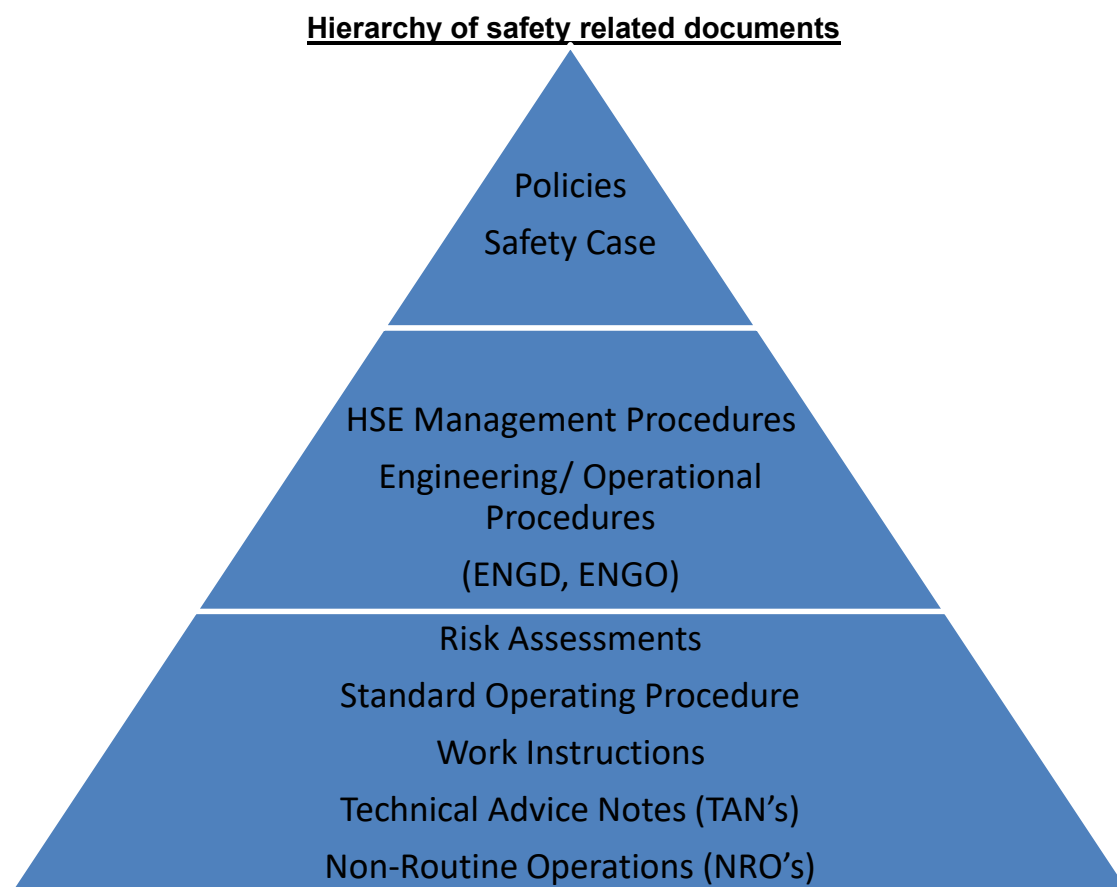


Fig. 3 Hierarchy of safety related documents within The Group HSE Management System.

All the above documents will be prepared by a nominated competent person and authorised by either the Director of Engineering and or the Group Chief Executive Officer. All proposed documents shall be subject to a consultation process which may involve either the ASHES Health and Safety committee or a separate working group. All documents shall be subject to regular reviews and audits. Full details of the ASHES HSE Management System Road Map can be found within the HSE Monitoring and Measurement document.

6.3 Consultation, Communication and Participation

Workers will be consulted on health and safety matters that may directly or indirectly affect them. This consultation may be formal (via worker / management health and safety meetings) or informal (during the course of day-to-day duties).

The ASHES committee is a forum of Health and Safety Champions' who have been appointed throughout all areas of PEHL, and who are involved in a consultation and participation process for developing, planning and implementing the Health, Safety and Environmental Management System. It is a forum where HSE issues can be raised and addressed and most importantly PEHL will consult members on issues and proposed controls ahead of introducing them within the Group. This may include the introduction or review of policies or procedures.

Details of the ASHES Committee shall be displayed on Company noticeboards along with copies of the most up-to-date minutes.

The Group shall endeavour to keep all staff informed on Health and Safety Issues. Communications shall take place at all levels and involve;

- Circulation of Policies and Procedures
- Issue of Health and Safety Reports.
- Issue of Health and Safety Statistics
- Promotion and participation in Health and Safety Initiatives and campaigns.

As part of the induction process the Company Health and Safety Policy will be issued to new employees.

Senior Managers, Line Managers and Supervisors must ensure that sufficient information about Hazards, Risks and Preventative Measures are provided to those who may be affected.

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