

Company Environmental Health & Safety Statement		
Safety Procedure Ref. No.	Document Revision	Approved
SP 03	34	Patrick Conroy

Controlled Document

MJ Conroy Construction is a Registered Business Name of Michael J. Conroy & Sons Limited

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Part 1 – EHS Statement Review

1.1 EHS Statement Review

Management at MJ Conroy Construction intends at least annually, to review this Environmental Health & Safety Statement to ensure its suitability, adequacy and effectiveness.

This Review will address the possible need for changes in policy, objectives, inclusion of new hazards or other elements of the EHS Statement in the light of the previous years experiences and to reflect current practices and legislative changes in health and safety.

MJ Conroy

1.2 Amendments Control Table

Revision Number	Revision Date	Revision Detail	Prepared by
Revision 1	16/01/2009	<ul style="list-style-type: none"> Initial Issue of new H&S Statement layout document. 	David Conroy
Revision 2	26/02/2010	<ul style="list-style-type: none"> Carried out a review of the H&S Statement for 2010. Updated risk assessment relating to excavators, Telescopic Handlers and Scaffolding. Reviewed and updated responsibilities of Site Managers, Foremen, Engineers, Safety Officer and Employees. 	David Conroy
Revision 3	31/01/2011	<ul style="list-style-type: none"> Carried out a complete review of the H&S Statement for 2010. Amalgamated contents of the Company Safety Manual and EHS Statement. 	David Conroy
Revision 4	10/02/2012	<ul style="list-style-type: none"> Initial issue for 2012. Updated Part 23.2 Appendix B. 	David Conroy
Revision 5	23/11/2012	<ul style="list-style-type: none"> Updated risk assessment relating to Hand Arm Vibration. Updated part 11.3 Updated all MJC form references. Part 23.2 Appendix B. 	Brian Conroy
Revision 6	29/01/2013	<ul style="list-style-type: none"> Initial issue for 2013. 	David Conroy
Revision 7	22/04/2013	<ul style="list-style-type: none"> Up-date and expansion of table-saw risk assessment 	Brian Conroy
Revision 8	06/06/2013	<ul style="list-style-type: none"> Updated all MJC form references. Part 23.2 Appendix B. Updated Part 7.2 – on-site file may be combination of hard and soft copy format. Addition of Part 8.5 – Company Vehicles. Reviewed and updated Part 14.2. Adding reference to H.S.A Safe System of Work Plan. Added Part 14.3 referring to having a Method Statement Register on projects. Addition of risk assessment number 56 – Vehicle Load Security. 	David Conroy
Revision 9	31/07/2013	<ul style="list-style-type: none"> Part 16. Amended Safety Disciplinary Procedure 	David Conroy
Revision 10	15/01/2014	<ul style="list-style-type: none"> Initial issue 2014 Amended to refer to the Safety Health & Welfare at Work Construction Regulations 2013 - 2021 	David Conroy
Revision 11	28/03/2014	<ul style="list-style-type: none"> Inserted new driving to work policy Re-arranged the hazard identification, risk assessment and control measures in order of importance Rewording to Part 23 – Risk Assessment and re formatting of layout. Addition of Cathal Conroy in the Contracts Manager position. Removal of appendices – Part 24. Reformatting of document to Times New Roman font. 	David Conroy
Revision 12	26/11/2014	<ul style="list-style-type: none"> Revision to wording in Parts 3 and 4 	David Conroy
Revision 13	11/02/2015	<ul style="list-style-type: none"> Addition of risk assessment numbers 58 to 65. Re-drafting of Part 9. Amendments to Part 12.3 with addition of Review Process section. Amendments to risk assessments 01, 23, 25 & 57. Inclusion of Part 3 - Safety Procedure 	David Conroy

Revision 14	26/05/2015	<ul style="list-style-type: none"> Complete review of Risk Assessment Library as per Safe-T-Cert audit 2014 targets. 	David Conroy
Revision 15	08/01/2016	<ul style="list-style-type: none"> Part 24 - New Risk Assessment template format Part 7 amended – Safety Policy must be signed by senior management Amendment to Part 7.8 on secondary and subsequent sub-contractors Section 9.1 added: Responsibilities of Plant and Machinery Operators 	David Conroy
Revision 16	06/07/2016	<ul style="list-style-type: none"> Parts 23 & 24 added. Corporate Social Responsibility and Temporary Works Design Risk Assessment No 11 updated. Overhead Powerlines 	David Conroy
Revision 17	03/02/2017	<ul style="list-style-type: none"> Updated Safety Policy 	David Conroy
Revision 18	21/02/2017	<ul style="list-style-type: none"> Part 9.7 – Company Vehicle inspection requirements updated Part 12.3 – Reporting procedure of accidents and dangerous occurrences updated in compliance with the GA Regulation 2016 	David Conroy
Revision 19	12/01/2018	<ul style="list-style-type: none"> Part 21 – Intoxicant Policy updated. Re-location of Section 9.1, Plant Operators into Section 6.8 Part 26, Risk Assessments Removed and Placed in separate Library of Risk Assessments, Document No. SP 25 	David Conroy
Revision 20	02/01/2019	<ul style="list-style-type: none"> Updated Part 2. Occupational Health & Safety Policy Part 9 added. Personal Protection Equipment Part 24 added. Severe Weather Working Policy 	David Conroy
Revision 21	06/01/2020	<ul style="list-style-type: none"> Part 13.5 – Hazardous Substances. CLP Regulations added Part 21 – Mental Health and Wellbeing Policy added 	David Conroy
Revision 22	27/04/2020	<ul style="list-style-type: none"> Part 13.9 added. Covid-19 Pandemic 	David Conroy
Revision 23	18/06/2020	<ul style="list-style-type: none"> Part 13.9 updated. Covid-19 Policy added Part 13.10 added. Working from Home Policy added Part 6.12 added. Covid-19 Compliance Officer Part 6.13 updated matrix to include Covid-19 Compliance Officer Part 14.3 updated to account for ISO 45001 audit Part 21 updated to include support services of LAYA Healthcare EAP and The Lighthouse Charity 	David Conroy
Revision 24	07/01/2021	<ul style="list-style-type: none"> Part 26. Grey Fleet Policy added Part 27. CCTV Policy added 	David Conroy
Revision 25	08/09/2021	<ul style="list-style-type: none"> Part 18 updated to include all MJ Conroy employees, all site management/ supervisors and all site personnel including subcontractors 	David Conroy
Revision 26	05/01/2022	<ul style="list-style-type: none"> Part 2 updated 	David Conroy
Revision 27	31/01/2022	<ul style="list-style-type: none"> Part 6.12. Reviewed Part 13.9. Coronavirus Policy reviewed Part 9.2. Added 	David Conroy
Revision 28	18/02/2022	<ul style="list-style-type: none"> Part 13.6 added. Asbestos Awareness Policy 	David Conroy
Revision 29	04/01/2023	<ul style="list-style-type: none"> Part 2 updated Reference to Construction Regulations 2013 changed to Construction Regulations 2013-2021 Reference to General Application Regulations 2007 	David Conroy

		<ul style="list-style-type: none"> changed to General Application Regulations 2007-2021 Part 31 updated Parts 6.2- 6.7 updated to include reference to KPIs Part 6.7 amended to include for H&S Advisor Part 6.13- Structure amended to include H&S Advisor position Part 13.1 added – Health & Safety KPIs Parts 14.1 & 14.3 updated to include H&S Advisor 	
Revision 30	15/08/2023	<ul style="list-style-type: none"> Part 12.1 updated. Portable Appliance Testing Part 13.12 added. Pregnancy & Breastfeeding Workers Part 22 added. Right to Disconnect Policy Part 32 updated. Hazard identification, RA & Controls 	David Conroy
Revision 31	02/01/2024	<ul style="list-style-type: none"> Part 2 updated Part 6.8 updated Part 27 updated 	David Conroy
Revision 32	21/06/2024	<ul style="list-style-type: none"> Part 13.12- Working from Home Policy changed to Work Life Balance Policy in line with updated Employee Handbook Part 13.14- Menopause Policy added in line with updated Employee Handbook 	David Conroy
Revision 33	10/10/2024	<ul style="list-style-type: none"> Renaming and repurposing Company Safety Statement as Company EHS Statement to account for the introduction of an integrated environmental and safety management system under ISO 14001 and ISO 45001 management systems. Part 10.1 updated Part 14.2 reworded Part 15.1 & 15.3 updated Part 16 reworded Part 17 reworded 	David Conroy
Revision 34	03/01/2025	<ul style="list-style-type: none"> Part 2 updated 	Kieran Corr

Document Location	MJ Conroy Construction head office and site offices
Related documents	<ul style="list-style-type: none"> MJ Conroy Construction EHS Procedures MJ Conroy Construction EHS Manual EHS Plan Construction Stage (prepared where applicable under regulations where MJ Conroy Construction is appointed PSCS) On-Site Working Safety File Company permits and forms H.S.A forms Safety, Health and Welfare at Work Act 2005 Safety, Health and Welfare at Work (Construction) Regulations 2013 - 2021 Safety, Health and Welfare at Work (General Application) Regulations 2007 - 2021 Applicable Codes of Practice and Statutory Provisions

Part 2 – Environmental, Health & Safety Policy & Commitment

It is management policy of MJ Conroy Construction in so far as is reasonably practicable, to seek and provide safe and healthy working conditions for the company's employees, providing information, training and supervision and to enlist the active support of all employees in achieving such conditions. It is also the policy of MJ Conroy Construction to protect the environment including the prevention of pollution through its work activities. To meet these objectives, we have established a documented EH&S management system that meets the needs of interested parties and complies with the requirements of ISO 45001:2018 and 14001:2015 and Safe-T-Cert.

It is the policy of management at MJ Conroy Construction:

- To promote standards of health, safety and welfare that comply with the provisions and requirements of the Safety, Health and Welfare at Work Act 2005 and the Safety, Health and Welfare at Work (General Application) Regulations 2007, the Safety, Health and Welfare at Work (Construction) Regulations 2013 as well as all other statutory provisions and Codes of Practice applicable to our organisation.
- To provide and maintain, as far as reasonably practicable, a safe and healthy working environment for employees of this company and others who may be affected by company operations.
- To ensure that all employees realise that they have a responsibility to co-operate with Management, to achieve a healthy and safe workplace and to take reasonable care of themselves and others.
- To consult with all staff and employees on matters of environmental, health and safety.
- To co-operate with, and seek the co-operation of, clients, main contractors, sub-contractors and enforcing authorities, to ensure work is carried out in a safe manner.
- To review the contents of the company EHS Statement as changes occur in this operation and periodically, to ensure this document is relevant.
- To bring the contents that are relevant to employees' attention annually by issuing them with a summary EHS Statement document.
- To ensure that the company EHS Statement is in a form, manner and, as appropriate, language that is reasonably likely to be understood by employees.
- To provide sufficient resources for the implementation of this policy and to seek competent advice if required.
- To work in accordance with any Joint Safety Agreements, approved by the health and safety Authority, in relation to the construction industry.
- To provide health surveillance where a need is identified by a risk assessment or where prescribed by law.
- To source materials that comply with the appropriate environmental and safety standards.
- To maintain a policy of ongoing identification and adherence to new environmental, health and safety legislation and best practice.
- To strive to continually seek improvements in the environmental, health and safety performance of the company and to provide a framework for setting EH&S objectives
- To hold formal senior management review meetings at least annually to review the environmental, health and safety performance of the company and to identify areas where improvements can be made in optimising environmental, health and safety performance.
- To commit to eliminate hazards and reduce EH&S risks.
- To commit to continually improve our EH&S Management system.

Signed:



Patrick Conroy on behalf of Michael J. Conroy & Sons Limited

Position: Managing Director; Michael J. Conroy & Sons Limited

Date: 03/01/2025

Part 3 – EHS Procedures

The purpose of the Environmental Health and Safety Procedures document is to outline the operation of the various procedures of the EHS management system of MJ Conroy Construction. It also serves as a permanent reference on the implementation methodology of the system for all levels of company management.

The procedures apply to all the building activities carried out by MJ Conroy Construction and it is made available to all company management at head office and on site via the shared company computer drive.

As with this EHS Statement, the Environmental Health and Safety Procedures are subject to ongoing review and revision.

The Environmental Health and Safety Procedures should be read in conjunction with this EHS Statement and any Construction Stage Environmental Health & Safety Plan that is prepared for a construction project (Refer to Part 4 of this document).

Part 4 – Construction Stage Environmental Health & Safety (EHS) Plan

On projects where MJ Conroy Construction is appointed as Project Supervisor Construction Stage (PSCS), the company develops a Construction Stage EHS Plan where required under the Safety Health & Welfare at Work Construction Regulations 2013 - 2021.

Under these regulations a Health & Safety Plan is required.

1. If the project is planned to last more than 30 working days or/ and
2. If the project is scheduled to exceed 500 person-days or/ and
3. If the project involves a particular risk as listed in schedule 1 of the above-mentioned regulations or any another risk identified but not listed in schedule 1.

The Plan is prepared based on information contained in the Preliminary Health & Safety Plan issued by the Project Supervisor Design Process (PSDP).

The Construction Stage EHS Plan is issued to the PSDP in advance of the project commencing by soft copy and if requested, it is also issued to the Client.

The Plan is to be used in conjunction with this Company EHS Statement as an information source as part of the health and safety management on each site.

A hard copy of the Plan is held on site in the site safety file along with a copy of the Preliminary Health & Safety Plan. Where necessary and practical it may also be held in soft copy format on site.

The Construction Stage EHS Plan is made available to Subcontractors on the project via the Project homepage on HammerTech.

The Construction Stage EHS Plan is subject to ongoing review throughout the duration of the project. Any revisions made to the Plan will be identified on page 2 of the Plan and the revised Plan issued to site. The revised Plan will be identified by a new revision number.

Part 5 - Duties & Responsibilities

MJ Conroy Construction

MANAGEMENT STRUCTURE – EHS RESPONSIBILITIES

Position	Name	Responsibilities
Managing Director	Patrick Conroy	Page 13
QEHS Director	David Conroy	Page 14
Contracts Manager(s)	As named in the EHS Construction Stage Plan	Page 15
Site Manager(s)	As named in the EHS Construction Stage Plan	Page 16
Engineer(s)	As named in the EHS Construction Stage Plan	Page 17
Foreman/men	As named in the EHS Construction Stage Plan	Page 18
QEHS Manager	Kieran Corr	Page 19
Employees		Page 20
Plant & Machinery Operators		Page 21
Sub-Contractors & Self Employed		Page 22
External Consultants		Page 23
Covid-19 Compliance Officer	As named in the EHS Construction Stage Plan	Page 24

EHS RESPONSIBILITIES***5.1 Managing Director***Patrick Conroy

It is the responsibility of the Managing Director to;

- Review and approve regularly the company EHS policy and statement and direct its implementation.
- Monitor the effectiveness of the EHS Statement and direct improvements as necessary.
- Ensure adequate resources are made available.
- Designate one or more competent employees to carry out environmental, health and safety activities related to the protection and prevention of occupational and environmental risks in the workplace.
- Ensure that an effective management system is in place with personnel designated with responsibility for the development, operation an implementation and the environmental, health and safety policy and procedures and that those persons have the means to carry out such responsibilities.
- Take account for any representations made by employees and take any actions deemed necessary.

EHS RESPONSIBILITIES

5.2 QEHS Director

David Conroy

David Conroy has the overall responsibility for the planned implementation of effective quality, environmental, health and safety standards, to comply with current legislation, according to the agreed objectives, and for ensuring that quality, environmental, health and safety standards are considered in planning, carrying out, and in organising work generally.

It is the QEHS Director's responsibility to;

- Ensure that the environmental health and safety management system is properly established, implemented and maintained.
- Ensure that the company facilitates consultation between staff and management.
- Ensure that specific environmental and safety responsibilities are delegated to other personnel. As new projects emerge the names of responsible persons will be notified, and the list amended accordingly.
- Ensure that the company EHS policy is reviewed regularly.
- Ensure that, as far as is reasonably practicable, that the place of work is safe, and that all equipment / plant supplied is in good working order and regularly maintained.
- Include safety and environmental issues in the planning / pricing of all work.
- Ensure that all employees are aware of the company policy regarding EHS.
- Ensure adequate resources are made available to manage work safely.
- Ensure KPIs are communicated, understood, and monitored.
- Seek the advice of competent external QEHS Managers if required.
- Liaise with clients, main contractors etc. regarding safety and environmental matters.
- Ensure that adequate insurances are in place.
- Provide information and training to employees to ensure that they can do their work safely and with consideration for the environment.
- Ensure that arrangements relating to reporting procedures are followed in the event of any reportable accidents, dangerous occurrences or environmental incidents.
- Set a good personal example by wearing the appropriate personal protective equipment when visiting site and always to be in a fit state to work safely.
- Take reasonable care to protect their own safety, health and welfare and that of others who may be affected by their acts or omissions.

EHS RESPONSIBILITIES**5.3 Contracts Manager(s)**

As named in the PSCS Environmental, Health & Safety Plan

Each appointed Contracts Manager in this company will ensure that;

- Adequate provision for safety, health and welfare is made in planning and pricing contracts.
- Supplementary information for new projects is prepared when necessary, as an addendum to the EHS Statement.
- The provisions of this policy EHS Statement are executed from project inception to completion on site.
- Plant and machinery allocated for each site is in good condition and inspected as required. Only trained personnel, over 18 years of age will be employed to operate such plant and machinery.
- All personnel recruited, or assigned to each site are suitable for and competent to carry out the work on site.
- Training will be provided for those who need training to carry out tasks.
- Adequate protection is provided on all sites to protect the public and in particular, where children are likely to enter sites, that perimeter hoarding/fencing is provided and maintained.
- The Project Supervisor appointed for the Construction Stage (PSCS) receives co-operation and is provided with information, as appropriate.
- The PSCS is provided with information in relation to any death, injury, condition or dangerous occurrence which is required to be notified to the Health and Safety Authority.
- Adequate facilities and arrangements for the welfare of employees are provided.
- To set a good personal example by wearing the appropriate personal protective equipment when visiting site and always to be in a fit state to work safely.
- To achieve the KPIs identified in this EHS Statement.
- To take reasonable care to protect their own safety, health and welfare and that of others who may be affected by their acts or omissions.
- To co-operate with the company to allow it to comply with its statutory requirements.
- Not to engage in improper conduct.
- To attend training made available by the company.
- To make the correct use of any article / substance provided by the company for safety and environmental reasons.
- Subcontractors and self-employed persons are aware of company EHS policy.
- Subcontractors have issued a copy of their EHS Statement and risk assessment method statement when requested.
- Site Managers, Supervisors, Foremen, External Consultants under your control implement this EHS Statement and comply with statutory requirements.

EHS RESPONSIBILITIES

5.4 Site Manager(s)

As named in the PSCS Environmental, Health & Safety Plan

It is the responsibility of Site Managers to;

- Implement the company's EHS Policy and to bring it to the attention of all employees and others in the workplace who may be affected by the Policy.
- To ensure that visitors /sub-contractors and employees comply with the company's EHS procedures.
- To organise and plan the work activities so that work is carried out to the required safety and environmental standards and with the minimum of risk.
- To know the broad requirements of relevant safety and environmental legislation and regulations and the clients / main contractors specific safety and environmental requirements.
- Plan and maintain a tidy site, arranging for the removal of refuse daily and ensure that sub-contractors keep the work area tidy.
- To identify and establish areas of responsibility with sub-contractors to avoid confusion.
- Ensure that the site has, where necessary, suitable perimeter fencing to keep children and others out of the site and away from danger.
- To periodically inspect the site and rectify hazards identified.
- To take reasonable care to protect their own safety, health and welfare and that of others who may be affected by their acts or omissions.
- To co-operate with the company to allow it to comply with its statutory requirements.
- Not to engage in improper conduct
- To attend training made available by the company.
- To make the correct use of any article / substance provided by the company for safety and environmental reasons.
- To check all machinery and plant including power and hand tools are maintained in good condition.
- To ensure that personal protection equipment is available, issued and worn.
- To ensure that first aid supplies are maintained properly in consultation with the company QEHS Manager or the company first aid person who may be working on the site.
- To assist in the investigation of accidents as set out in this EHS Statement.
- To set a good personal example by wearing the appropriate personal protection equipment.
- To seek the advice of the company QEHS Manager on any matter relating to EHS as may be required throughout the project duration.
- Assist in maintaining all EHS documentation issued by company QEHS Manager to site.
- To ensure all company operatives receive site specific EHS induction.
- To ensure compliance by all site operatives of site rules and other site-specific requirements as detailed in the construction stage EHS plan and design process plan as issued on sites where MJ Conroy Construction is appointed PSCS.
- To assist in maintaining all site EHS documentation as issued to site by the company QEHS Manager.
- To assist in giving Toolbox talks when requested.
- To achieve the KPIs identified in this EHS Statement.

EHS RESPONSIBILITIES

5.5 Engineer(s)

As named in the PSCS Environmental, Health & Safety Plan

It is the responsibility of Engineers to;

- Implement the company's EHS Policy and to bring it to the attention of all employees and others in the workplace who may be affected by the Policy.
- To ensure that visitors /sub-contractors and employees comply with the company's EHS procedures.
- To organise and plan the work activities so that work is carried out to the required safety and environmental standards and with the minimum of risk.
- To know the broad requirements of relevant safety and environmental legislation and regulations and the clients / main contractors specific safety and environmental requirements.
- Plan and maintain a tidy site, arranging for the removal of refuse daily and ensure that sub-contractors keep the work area tidy.
- To identify and establish areas of responsibility with sub-contractors to avoid confusion.
- Ensure that the site has, where necessary, suitable perimeter fencing to keep children and others out of the site and away from danger.
- To periodically inspect the site and rectify hazards identified.
- To take reasonable care to protect their own safety, health and welfare and that of others who may be affected by their acts or omissions.
- To co-operate with the company to allow it to comply with its statutory requirements.
- Not to engage in improper conduct.
- To attend training made available by the company.
- To make the correct use of any article / substance provided by the company for safety and environmental reasons.
- To check all machinery and plant including power and hand tools are maintained in good condition.
- To ensure that personal protection equipment is available, issued and worn.
- To ensure that first aid supplies are maintained properly in consultation with the company QEHS Manager or with a company trained first aid employee who may be working on the specific site.
- To assist in the investigation of accidents as set out in this EHS Statement.
- To set a good example by wearing the appropriate personal protection equipment.
- To seek the advice of the company QEHS Manager on matters of EHS as may be required throughout the project duration.
- To ensure all company operatives receive site specific EHS induction.
- To ensure compliance by all site operatives of site rules and other site-specific requirements as detailed in the construction stage EHS plan and design process plan as issued on sites where MJ Conroy Construction is appointed PSCS.
- To assist in maintaining all site EHS documentation as issued to site by the company QEHS Manager.
- To assist in giving Toolbox talks when requested.
- To achieve the KPIs identified in this EHS Statement.

EHS RESPONSIBILITIES**5.6 Foreman/men**As named in the PSCS Environmental, Health & Safety Plan

It is the responsibility of Foremen to;

- Implement the company's EHS Policy and to bring it to the attention of all employees and others in the workplace who may be affected by the Policy.
- To ensure that visitors /sub-contractors and employees comply with the company's EHS procedures.
- To organise and plan the work activities so that work is carried out to the required safety and environmental standards and with the minimum of risk.
- To know the broad requirements of relevant safety and environmental legislation and regulations and the clients / main contractors specific safety and environmental requirements.
- Plan and maintain a tidy site, arranging for the removal of refuse daily and ensure that sub-contractors keep the work area tidy.
- To identify and establish areas of responsibility with sub-contractors to avoid confusion.
- Ensure that the site has, where necessary, suitable perimeter fencing to keep children and others out of the site and away from danger.
- To periodically inspect the site and rectify hazards identified.
- To take reasonable care to protect their own safety, health and welfare and that of others who may be affected by their acts or omissions.
- To co-operate with the company to allow it to comply with its statutory requirements.
- Not to engage in improper conduct.
- To attend training made available by the company.
- To make the correct use of any article / substance provided by the company for safety and environmental reasons.
- To check all machinery and plant including power and hand tools are maintained in good condition.
- To ensure that personal protection equipment is available, issued and worn.
- To ensure that first aid supplies are maintained properly in consultation with the company QEHS Manager or with a company trained first aid employee who may be working on the specific site.
- To assist in the investigation of accidents as set out in this EHS Statement.
- To set a good example by wearing the appropriate personal protection equipment.
- To seek the advice of the company QEHS Manager on matters of EHS as may be required throughout the project duration.
- To ensure all company operatives receive site specific EHS induction.
- To ensure compliance by all site operatives of site rules and other site-specific requirements as detailed in the construction stage EHS plan and design process plan as issued on sites where MJ Conroy Construction is appointed PSCS.
- To assist in maintaining all site EHS documentation as issued to site by the company QEHS Manager.
- To assist in maintaining all site EHS documentation as issued to site by the company QEHS Manager.
- To assist in giving Toolbox talks when requested.
- To achieve the KPIs identified in this EHS Statement.

EHS RESPONSIBILITIES

5.7 Company QEHS Manager

Kieran Corr and as maybe named in the PSCS Environmental, Health & Safety Plan

It is the responsibility of the company QHES Manager to;

- Monitor the implementation of the EHS Policy in the company.
- Advise management on Laws, Regulations and Directives which impinge on company activities.
- Advise on and monitor statutory tests on plant and equipment.
- Advise company personnel on safety and environmental issues.
- Ensure KPIs are communicated, understood, and monitored.
- Provide or organise training courses to meet identified needs.
- Liaise with the appointed Safety Representative and any workplace/ engagement committees on matters relating to EHS.
- Consult the Health and Safety Authority and Environmental Protection Agency if required.
- Meet the HSA and EPA Inspector on visits to any company workplace.
- To take reasonable care to protect their own safety, health and welfare and that of others who may be affected by their acts or omissions.
- To co-operate with the company to allow it to comply with its statutory requirements.
- Not to engage in improper conduct
- To attend training made available by the company.
- To make the correct use of any article / substance provided by the company for safety and environmental reasons.
- Carry out periodic site surveys and document findings for site management.
- Advise the Managing Director and other company directors on the implementation of this EHS Statement and policy and on any revisions required to it to ensure compliance with ongoing changes in legislation and best practice.
- Investigate accidents, dangerous occurrences, environmental incidents on sites and consult with company insurers and loss adjusters as necessary and notify the HSA / EPA if required.
- To set a good personal example by wearing the appropriate personal protection equipment when visiting sites.
- Organise statutory inspections and tests on plant and equipment.
- Ensure enforcement of site safety disciplinary procedures as detailed in this EHS Statement.
- Consult with competent persons external to the company when required to advice on matters of EHS.
- On projects where MJ Conroy Construction is appointed PSCS to co-ordinate activities as required under the Safety Health and Welfare at Work Construction Regulations 2013 - 2021.
- To organise and give Toolbox talks to site operatives.
- To assist site management in the drafting of risk assessments method statements and to maintain a register of risk assessments method statement produced by the company.
- To meet with any inspector appointed by the company insurers on site or where not possible to organise alternative meeting arrangements.
- To continuously review the EHS management system as designed with the aim to strive to continually improve the system to meet the on-going needs of the company.
- To meet and co-operate with external QEHS ISO and Safe T Cert auditors annually and strive to implement the recommendations and targets as set out in audit reports.

EHS RESPONSIBILITIES

5.8 Employees

It is the responsibility of all employees of MJ Conroy Construction;

- To be familiar with the Company EHS Statement relevant to your work activities.
- To take reasonable care of your own safety, health and welfare and that of any other person that may be affected by your acts or omissions while at work.
- Co-operate with your employer and any other person to such an extent as will enable your employer or other person to comply with any of the relevant statutory provisions with regard to EHS.
- Use in such manner, so far as to provide the protection intended, protective clothing, equipment or other means or things so provided (whether for use alone or for use by you in common with others) for securing your safety, health and welfare while at work.
- Report to your supervisor or employer without unreasonable delay any defect in the plant, equipment, place of work or system of work which might endanger safety, health and welfare of which you become aware.
- No person shall intentionally or recklessly interfere with or misuse any appliance, protective clothing, convenience, equipment, or other means or thing provided in pursuance of any of the relevant Statutory provisions or otherwise, for securing the safety, health and welfare of persons arising out of work activities.
- Use correct tools and equipment for the job. Do not use tools, machinery or equipment requiring special training if you have not received such training.
- Keep tools in good condition.
- Employees are encouraged to make suggestions or raise concerns and are hereby consulted initially on EHS matters.
- Develop a personal concern for safety for yourselves and for others.
- To avoid any action which would be a source of danger to yourself and/or others.
- Employees must not carry out any tasks which they feel they are not competent to carry out or which involves unreasonably high risks.
- Report all accidents and dangerous occurrences to your supervisor.
- To set a good personal example by wearing the appropriate personal protective equipment when visiting site and always to be in a fit state to work safely.
- To take reasonable care to protect their own safety, health and welfare and that of others who may be affected by their acts or omissions.
- To co-operate with the company in order to allow it to comply with its statutory requirements.
- Not to engage in improper conduct.
- To attend training made available by the company.
- To make the correct use of any article / substance provided by the company for safety and environmental reasons.
- To wear safety helmet, boots and hi-vis vest or jacket at work and to make proper use of any other personal protection equipment provided for your safety and health.
- To abide by site rules as outlined at site EHS induction.
- To adhere to safe systems of work as detailed in method statement risk assessments and Safe Plans of Action as completed for specific work activities.
- To ensure that he / she are not under the influence of an intoxicant or substance that could endanger his or her own safety or the safety of others while at work.
- Notify your supervisor before starting work if you are using prescription or over the counter drugs that may impair your ability to safely perform your job or affect the safety of others.
- Comply with the provisions as set out in the Company Employee Handbook issued to all Company Employees.
- To engage with HammerTech, PlanRadar and any other technology as required by the company whilst undertaking their work.

- Employees must conduct themselves appropriately when representing the company outside of the workplace (i.e.) at training or any company functions/ events etc.

MJ Conroy

EHS RESPONSIBILITIES

5.9 Plant & Machinery Operators

It is the responsibility of all Plant & Machinery Operators of MJ Conroy Construction;

- To operate plant and machinery in a safe manner and as trained at all times in a manner so as not to endanger their own health and safety or and the health and safety of others.
- To operate plant and machinery so as not to damage it or any other property.
- To attend all necessary training courses as required by law and by MJ Conroy Construction or their employer.
- Not intentionally or recklessly interfere with or misuse any plant or machinery.
- To carry out all statutory inspections in the prescribed form as required by law and by MJ Conroy Construction.
- To report without reasonable delay any defects or damage to management.
- Not to operate plant or machinery that they are aware is in an unsafe condition.

EHS RESPONSIBILITIES

5.10 Sub-Contractors & Self Employed

It is the policy of MJ Conroy Construction, that self-employed persons and sub-contractors are obliged to;

- Comply with the EHS policy of this company.
- Co-operate with site management in providing a safe place of work and a safe system of operation.
- Ensure all their employees, and others under their direct control are provided with and wear safety helmets, safety boots and other personal protective equipment necessary for the safe execution of their work.
- Report to Site Management, any defect in the plant and equipment, place of work, or system of work without unreasonable delay.
- Use competent and suitable persons on site.
- Ensure that their managers, supervisors and employees are aware of the obligations placed upon them with regard to environmental, health and safety.
- Co-operate with the Project Supervisor appointed for the Construction Stage (PSCS) and provide to the PSCS information, as appropriate, including a copy of their EHS Statement, and must take into account any directions of the PSCS.
- Provide information, as appropriate, in relation to any death, injury, condition or dangerous occurrence which is required to be notified to the Health and Safety Authority.
- Produce confirmation when requested showing that appropriate employers and public liability insurance are in place.
- Attend and EHS courses or induction prepared for workers on projects managed by MJ Conroy Construction.
- Obtain the consent of MJ Conroy Construction contracts manager before sub-contracting any part of their work package.
- Bring to the attention of MJ Conroy Construction or anyone else who may be affected, any process or use of materials by them which may endanger the health and safety whilst at work.
- In pursuance of the 2013 safety, health and welfare at work (construction) regulations, subcontractors and self-employed must produce evidence to MJ Conroy Construction that all their employees and persons working under their care carry a valid Safe Pass card and any other necessary Construction Skills Certification Scheme (CSCS) certificate before entering site as stipulated in the 2013 regulations.
- Ensure that they, their employees and others under their direct control are not under the influence of an intoxicant or substance that could endanger their own safety or the safety of others while at work.

Note: Subcontractors and self-employed are themselves employers in their own right and as such have themselves statutory non-transferable duties to provide for the on-going good health and safety of their own employees and those others who may be affected by their works irrespective of who the Client, PSCS, Main Contractor or Contracting Contractor may be.

EHS RESPONSIBILITIES

5.11 External Consultants

It is the policy of MJ Conroy Construction that external consultants employed by the company are obliged to;

- Comply with the environmental, health and safety policy of this company.
- Co-operate with company management in providing a safe place of work and safe system of operation.
- Ensure that they seek the advice of company management on matters pertaining to environmental health and safety as necessary to carry out their work and the work of the company in a manner compliant with environmental health and safety regulations.
- Not to engage in improper conduct.
- Use in such a manner, so far as to provide the protection intended, protective clothing, equipment or other means of things so provided (whether for use alone or for use by you in common with others) for securing your safety, health and welfare while at work.
- To avoid any action that would be a source of danger to yourself and/ or others.
- To ensure that you are not under the influence of an intoxicant to the extent that you may cause danger to the safety of yourself and/ or others.
- External Consultants employed by the company may include, but is not limited to, Quantity Surveyors, QEHS Managers, Service Co-ordinators, Site Managers etc.
- Ensure that they are not under the influence of an intoxicant or substance that could endanger their own safety or the safety of others while at work.

EHS RESPONSIBILITIES

5.12 Covid-19 Compliance Officer

As named in the PSCS Environmental, Health & Safety Plan

It is the policy of MJ Conroy Construction that external consultants employed by the company are obliged to;

Proactive Day to Day Duties

- Regular monitoring of COVID-19 controls on site.
- Ensure there is up to date signage and information erected on site on COVID-19 to educate and inform operatives.
- Ensure regular cleaning of welfare facilities, handrails etc.
- Ensure stocks of handwash/ sanitisers/ cleaning solutions are replenished when required.
- Check hot water and drying facilities.
- Make representations to site management with regards to any COVID-19 concerns raised on site by personnel to the Compliance Officer.
- Report any concerns and non-compliance to site management.
- Keep up to date with HSE guidelines.

Reactive Day to Day Duties

The primary role of the Compliance Officer is in a proactive manner to prevent the spread of COVID-19 virus on site.

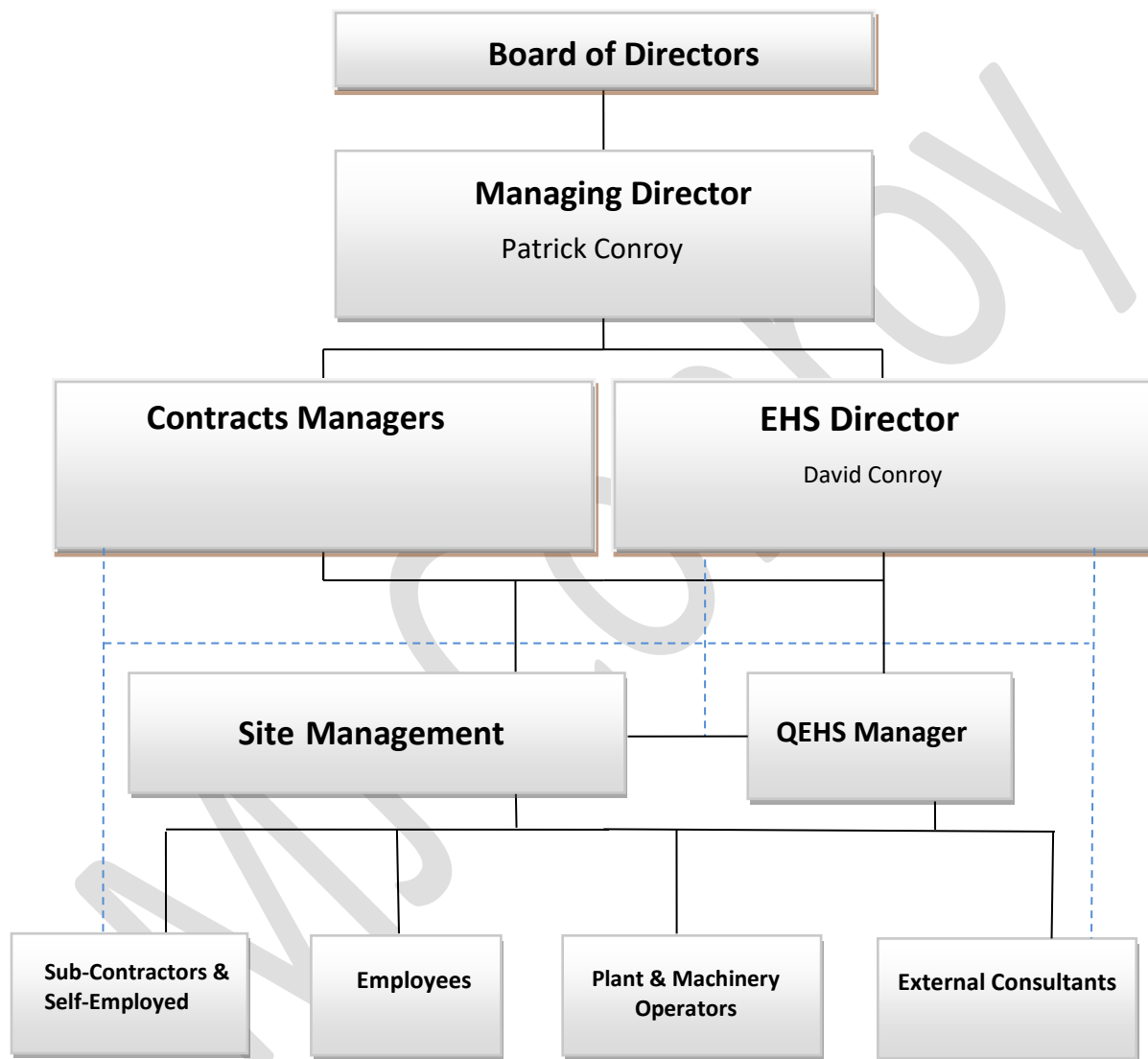
However, there is the potential where an individual on site may develop symptoms of COVID-19 and where the Compliance Office needs to react.

In a reactive position, their responsibilities include;

- Inform site management if they are aware of a person on site who may have COVID-19 symptoms
- Assist in contact tracing if there is a confirmed case of COVID-19.

EHS RESPONSIBILITIES

5.13 EHS Management Structure



Lines of Communication -----

Lines of Direct Responsibility _____

Part 6 – Managing Sub-contractors

On appointing sub-contractors, the following procedures will be carried out:

6.1 EHS Statement

- All sub-contractors will be expected to comply with their Policy for Environmental, Health, Safety and Welfare and any other requirements made known to them by management of MJ Conroy Construction.
- Sub-contractors will be advised of any other EHS requirements, e.g. the requirement to produce a risk assessment method statement prior to the commencement of their work on the specific site and training requirements.
- A copy of their EHS Statement and Policy must be issued to MJ Conroy Construction before work commences. The Policy must be signed by senior management prior to being issued.
- If the subcontractor is not requested to produce a risk assessment method statement or not required to work under a Safe Plan of Action, the EHS Statement must contain the following site-specific information,
 1. Site location & contact details.
 2. Work description.
 3. Work duration.
 4. Emergency/ first aid details.
 5. Risk assessment covering the work which the contractor is to undertake on site.
- The decision for the subcontractor to produce a risk assessment method statement or work under a Safe Plan of Action will be made by MJ Conroy Construction Site Management and the company QEHS Manager prior to the subcontractor commencing work on site.

6.2 Insurance

- Sub-contractors will have to provide evidence of adequate employer and public liability insurance prior to commencing work. This information will be stored on HammerTech.

6.3 Plant

- All subcontractors providing plant will be required to ensure that the plant is safe to operate, and any statutory requirements have been implemented.
- All operators must be competent and have any required training to operate the plant.
- All operators must carry out inspections as per statutory requirements.

6.4 General

- All sub-contractors must provide competent and suitable persons on site and must get the approval of the Contracts Manager to engage persons other than their direct employees on site, i.e. before they sub-contract work.
- Sub-contractors have a duty to report any defect in plant or equipment, place of work or system of work, without delay to MJ Conroy Construction.
- Sub-contractors must ensure that their supervisors and personnel are aware of their obligations with regard to health and safety.
- Sub-contractors have a duty to provide information as appropriate to MJ Conroy Construction in relation to any accident or dangerous occurrence which occurs on site.

- If requested, subcontractors must produce a risk assessment method statement in advance of their works to MJ Conroy Construction. The risk assessment method statement must contain the following information.
 1. Title/ Scope.
 2. Step by step procedure.
 3. Risk Assessment.
 4. PPE requirements.
 5. Supervisors name.
 6. Sign off section. All operatives carrying out the work to which the method statement relates must be brought through it in advance of commencing the work and must sign it off.

6.5 Risk Assessment Method Statements

If requested by MJ Conroy Construction, the subcontractor must issue a risk assessment method statement for their work on site. This must be issued in advance to MJ Conroy Construction of commencing the work on site for approval.

MJ Conroy Construction requires that risk assessment method statements contain the information as stipulated in point 6.4.

All risk assessment method statements must be signed by those carrying out the work prior to the work taking place.

MJ Conroy Construction must be issued with a copy of the signed off risk assessment method statement for maintaining in the project safety file.

6.6 Site Induction

All sub-contractor operatives must attend site EHS induction arranged by MJ Conroy Construction where the company is appointed PSCS or attend induction organised by any other contractor who may be appointed as PSCS. Safe Pass and manual handling details must be presented at induction and a record of this will be held by MJ Conroy Construction as part of the induction on HammerTech.

Since start of 2023, MJ Conroy Construction require that induction for most projects be completed on HammerTech. ¹

On sites where the Client requires that all contractors attend their EHS/ Corporate Induction, all subcontractors must ensure that their operatives attend any such induction that may be organised.

6.7 Secondary & subsequent Sub-contractors

Secondary and subsequent sub-contractors of the main sub-contractor being brought onto MJ Conroy sites are subject to the same health and safety requirements and regulations as the main sub-contractors.

¹ **HammerTech** is an online safety management system platform that allows for the implementation, management and compliance of a construction firms OH&SMS. Through the use of HammerTech, MJ Conroy migrated to a majority paperless system, based online, accessible via PC, Smart Phone, Tablet, providing different users with various levels of permission to allow them upload documentation, complete inspections, carry out audits, complete inductions, project sign-in, permit and reports completion etc.
<https://mjconroy.hammertechonline.com/>

Part 7 - Pre - Project Commencement

7.1 Safety Setup

Prior to commencement of the project, all necessary site documentation is prepared to compile the site EHS file. Site Safety Setup form (MJC-S28) maybe used to assist in identifying the documentation and on-site safety equipment, facilities and signage, notification requirements ahead of commencing the project. The setup is agreed with MJ Conroy Construction site management team ahead of commencement.

7.2 On-site EHS File

On projects where MJ Conroy Construction is Project Supervisor Construction Stage (PSCS), the company will maintain a site EHS file as per statutory requirement. The file is primarily an online system on HammerTech. It is updated on an on-going basis throughout the project duration. At the end of the project the file is to be retained on the HammerTech system until eventually archived. Once archived its data can be retrieved.

On projects where MJ Conroy Construction is not PSCS, a file will be maintained with project specific including any client and PSCS requested EHS information.

7.3 H.S.A. notification

Prior notification to the Health & Safety Authority of commencing a project is required if;

1. Work is planned to last more than 30 working days or
2. The work is scheduled to exceed 500 person-days

Notification of the project to the Authority is done on-line on their web site or it can be done manually by completing the AF2 form and submitting it by registered post to the H.S.A. head office.

Note: For notifiable projects, the Client must also submit a notification to the H.S.A. They do this by completing an AF1 form. A copy of this form is to be requested from the Client and displayed on site with the AF2 form submitted by MJ Conroy Construction.

7.4 EHS Signage

Site EHS signage requirements are agreed at site set up stage and reviewed on an on-going basis throughout the project taking into account changes in site set-up, access, route changes, and task specific requirements. Signage is provided to site as required. It is the responsibility of site management to ensure that the signage is maintained.

Part 8 –Personal Protective Equipment (PPE)

8.1 Mandatory PPE

The wearing of hi-visibility vest or jacket, safety helmet and safety footwear are mandatory on all MJ Conroy controlled Construction sites.

All PPE must meet the minimum requirements of the applicable EN Standard.

All MJ Conroy Construction employees are issued with safety helmet, hi visibility jacket and vest as required or as per manufacturers recommendations. They are reimbursed the cost of a pair of safety boots annually.

8.2 Safety Helmet

Safety Helmets issued to employees will have MJ Conroy logo.

Position	Helmet Colour
Supervisory/ Management	Black
Site Operatives	White

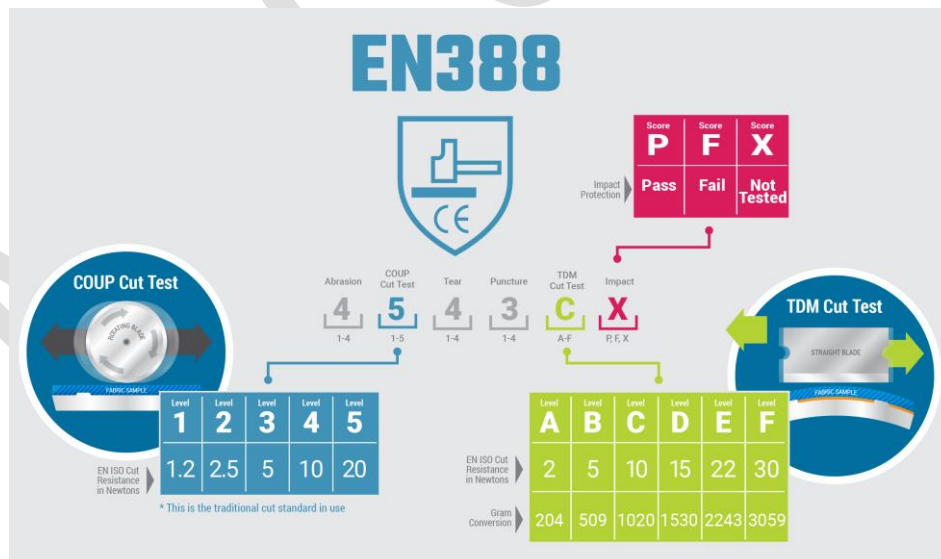
8.3 Eye Protection

Eye Protection must be worn on sites where they are deemed compulsory by the client or PSCS. Otherwise, they are mandatory on jobs such as but not limited to working with or close to an angle grinder, consaw, kango hammer, jack hammer, working with chemicals and as per Risk Assessment, SPA or RAMS.

8.4 Safety Gloves

Safety gloves must be worn on sites where they are deemed mandatory PPE by the client or PSCS. Otherwise, they must be worn as per Risk Assessment.

In compliance with EN 388: 2016; all safety gloves have a 6-digit alpha/numeric code printed on them specifying the designed safety strength of the difference types of gloves to assist in the identification of the best gloves to use for the specific task.



8.5 Other PPE

The requirement to use any other PPE such as fall arrest equipment and hearing protection will be based on the results of Risk Assessment completed in advance of carrying out the job. If specific PPE is specified as part of Risk

Assessment, then it shall be used provided the intended/nominated user is deemed adequately trained, qualified, or competent.

Part 9 – Lifting Gear, Plant & Machinery

9.1 MJ Conroy owned

As per the requirements of the Safety Health & Welfare at Work (General Application) Regulations 2007 - 2021, all MJ Conroy Construction lifting gear, plant and machinery is subject to statutory inspection.

Lifting plant and machinery used for lifting of persons is subject to a GA1 Thorough Examination every six months e.g. mobile elevated working platforms and Cherry Pickers.

Similarly lifting gear such as chains, shackles, swivel attachments, forklift prong extensions are subject to GA1 Thorough Examination every six months.

All other lifting plant and machinery is subject to GA1 Thorough Examination every 12 months. e.g., Telescopic Handlers, Forklifts and Excavators.

With respect to Telescopic Handlers and Excavators, these thorough inspections are carried out by an engineer appointed by the insurance company with whom Special Types Machinery Insurance policies covering these machines is held.

For all other lifting equipment, the inspections are carried out by a specialist external lifting equipment firm who specialise in such work.

All GA1 inspection reports are made available after completion of the inspection on the inspection firms web portal for downloading.

Any corrective items identified in the reports must be rectified as soon as possible or within any timeframe specified in the report and confirmation of the correction items having been closed out must be logged in the company equipment register.

A copy of the inspection record is contained in the on-site safety file for whatever equipment is used on the particular site.

9.2 Weekly Inspection of Telescopic Handlers & Excavators

As per the requirements of the Safety Health & Welfare at Work (General Application) Regulations 2007 - 2021, the operator of company owned Telescopic Handlers and Excavators must record a weekly visual inspection of the plant. This is carried out using the company form; MJC-S34, completed primarily on the HammerTech online system.

9.3 Hired in Lifting Gear, Plant & Machinery

Any lifting gear, plant and machinery hired in by MJ Conroy Construction must have an accompanying in-date GA1 inspection form and this must be presented when it is brought to site for the first time. A copy of the inspection is to be given to MJ Conroy Construction and held on the site-specific safety file.

Subsequently all such plant is subject to weekly inspection which on site which (GA2 or GA3) must be recorded on the statutory H.S.A. issued, *Report of Weekly Examination* GA2 or GA3 form or similar.

These inspections are completed primarily on the HammerTech online system.

9.4 Subcontractors Equipment

Subcontractors engaged by MJ Conroy Construction who bring plant and machinery onto site must provide in-date annual or six-monthly inspection reports (GA1) and complete weekly operator inspection reports as required under regulation. Details of the GA1 inspection will be requested by MJ Conroy Construction site management before being permitted to be used on site. The weekly inspection must be completed on a H.S.A. issued, *Report of Weekly Examination* GA2 or GA3 form or similar. A copy of the GA1 is to be provided to MJ Conroy Construction prior to or upon arrival on site along with a copy of the completed weekly inspection whilst the equipment is on site working for MJ Conroy Construction.

9.5 Identification

All lifting equipment belonging to MJ Conroy Construction, subcontractors or hired must have a label or tag attached identifying the equipment type, owner, and date of next due inspection when in use on site. This identification may take the form of an MJ Conroy issued blue identification sticker on the plant. This sticker is issued for MEWPS, Cherry Pickers, Excavators, Cranes, and Telescopic Handlers.

9.6 Company Vehicles

In accordance with the requirements of applicable legislation and of the Road Safety Authority (RSA), company vehicles, namely; cars, vans, lorries, trailers are subject to weekly walk-around visual inspection by the driver. The result of such inspections shall be completed on the company vehicle check sheet form; MJC-S42 on HammerTech.

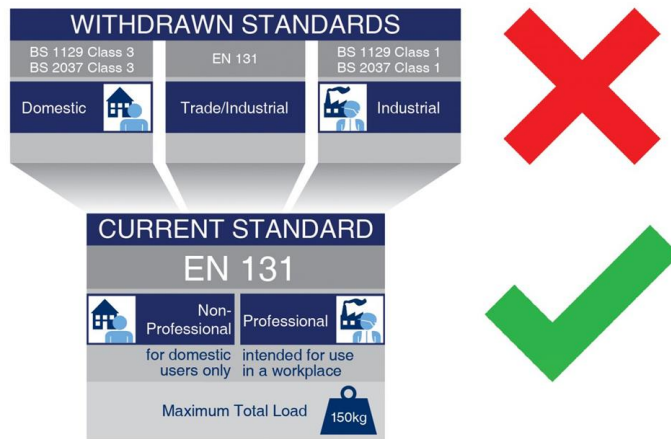
Part 10 - Work at Height Equipment

10.1 Ladders

Company ladders are subject to weekly on-site inspection using the appropriate GA3 form, using primarily the HammerTech system.

As with all company equipment inducted onto HammerTech, the HammerTech system allows for the creation of a register of all ladders.

All new ladders brought into use must now comply with to EN131 Professional ladder standard and are required to be identified as such.



10.2 Fall Arrest Equipment

All company owned fall arrest equipment in use is subject to weekly visual inspection and periodic detailed inspections.

Records of weekly inspection are recorded on the appropriate GA3 form, using primarily the HammerTech system.

The record of the detailed six-monthly periodic inspections is held in soft copy, on HammerTech, which also allows for the creation of a register of the equipment. The detailed inspection is carried out by either the QEHS Manager or EHSS Director.

All company fall arrest equipment is tagged at inspection and identified by unique identification marking which is placed on the equipment when it is first brought into use.

Part 11 - Portable Appliance Testing

11.1 Testing Arrangements

Company electrical tools and equipment are subject to periodic Portable Appliance Testing (PAT Testing). The testing is scheduled to be carried out every six months on construction site equipment and every five years on office-based equipment. This scheduling is as per the HSA guidance note of November 2014, suggested intervals between periodic inspections and testing².

This testing is carried out in-house by trained employees using a company owned PAT tester machine. Each piece of equipment that passes a test is tagged as such and a copy of the test results maintained in soft copy.

Part 12 – Safe Working Arrangements

12.1 Environmental Health & Safety KPIs

MJ Conroy Construction will endeavour to annually achieve the KPI targets identified in the tables below. Through ongoing training, consultation and safe working arrangements the KPIs recorded will be monitored, evaluated and revised, if necessary. They will be reviewed on a quarterly and annual basis.

These KPIs will assist identify areas for improvement and evaluate the success of our business from a QEHS perspective.

At a company level, the following KPIs will be monitored.

Company KPIs (annual)	Target
Dangerous Occurrences	0
Incidents	0
Lost Time Accidents	0
First Aids	0
GMP/ QA issues	0
Environmental issues	0

The following **project specific** monthly KPIs will also be monitored and recorded.

Project Specific KPIs (monthly)	Target
Toolbox Talks	2
Observations/ Good Catches	6
EHS audits	3

² https://www.hsa.ie/eng/publications_and_forms/publications/information_sheets/guidance-note_on_periodic_inspection_and_testing_of_electrical_installations.html

The following Management level KPIs apply.

Management Level	Weekly	Fortnightly	Monthly	Quarterly	As required
Director/ Senior Company Management <ul style="list-style-type: none"> Participate in one of – EHS walk, fire drill, task observation or supervisors site safety checklist. Identify one negative and one positive observation. 				X	
Management Level	Weekly	Fortnightly	Monthly	Quarterly	As required
Site Management – incl. supervisors & engineers <ul style="list-style-type: none"> Conduct or participate in one of – <ol style="list-style-type: none"> company vehicle inspection detailed EHS inspection. First Aid Box check Supervisor Safety checklist GA inspection of plant/ equipment if competent task observation on a high-risk activity (via task observation on 			X		

HammerTech) <ul style="list-style-type: none"> Raise at a <u>minimum one</u> observation, positive or negative with photos. 	X				
EHS Director Conduct or participate in one inspection or checklist completion across all projects or and offices.			X		
Management Level	Weekly	Fortnightly	Monthly	Quarterly	As required
QEHS Manager To be completed on each project <ol style="list-style-type: none"> Conduct Detailed EHS inspection. Task observation on high-risk activity. Conduct or participate in in one GA3 inspection. Conduct spot checks on plant & equipment. Carry out toolbox talk. 		X			X
	X				
	X				
		X			

The above management KPIs are minimum expectations to be achieved. These will be reviewed as part of project reviews and QEHS system review and engagement meetings.

12.2 First Aid

- Where MJ Conroy Construction is working as a subcontractor, arrangements will be agreed with the main contractor.
- A first aid box will be provided on all sites, and it is the responsibility of site management, and any company appointed qualified first aid person on site to ensure that it is always adequately stocked.
- The names of first aid personnel will be posted up on site as well as being made known to all at site specific induction.

12.3 EHS Emergency Plans

- Where required MJ Conroy Construction will provide the necessary measures to be taken, with regard to first aid, accidents, firefighting, environmental incidents, and the evacuation of employees or other individuals.
- When working as main contractor, an EHS emergency plan will be in place and details of which will be outlined in the EHS Plan Construction Stage and will be made known to all site personnel at induction.
- When working as a sub-contractor, MJ Conroy Construction will co-operate with the Project Supervisor Construction Stage with regards to the site emergency plan.

12.4 Investigating and Reporting of EHS Accidents, Incidents and Dangerous Occurrences

- MJ Conroy Construction operates the following procedures for investigation and reporting of Accidents, Incidents and Dangerous Occurrences.

Accidents

When an accident occurs, the procedure below must be followed.

1. The site management must be notified immediately. The site management must take charge of the proceedings as follows:
2. Notify a company trained first-aid person on site to attend the scene and to treat the casualty.
3. Observe the accident location and status of the injured person.
4. If there is a risk of further injury move the injured person to safety.
5. If necessary, to call for medical assistance or the emergency services.
6. If an ambulance is called, make sure the exact location is given and that the ambulance can access the site as near as possible to the injured person.
7. Notify the company contracts manager and QEHS Manager.
8. Establish the location of the hospital and appoint a suitable person to travel with the injury person.
9. In liaison with the Company's Contracts Manager and QEHS Manager, Site Management must:

Gather immediately all information about the accident and what led up to it.

Where necessary, obtain witness statements and write them down as they are given.

Complete the accident record book and furnish head office with a copy of the accident record entry.

Take sketches/photographs of the area where the accident happened.

If the H.S.A. are to inspect the site and location of the accident cordon off the accident area and do not permit anything to be moved unless necessary to avoid any further injury.

10. The QEHS Manager or EHS Director is to notify the insurance company and company Loss Adjuster of all accidents.
11. If necessary, senior company management are to arrange to have the family of the injured person notified and if required arrange to have them taken to the hospital.
12. All accidents are to be recorded in the accident record book held on site. In addition, a company accident investigation form must also be completed.

The investigation of the accident must identify;

1. The immediate actions taken as a result of the accident.
2. The immediate corrective actions to be taken to prevent recurrence.
3. The immediate causes of the accident.
4. The root causes of the accident.
5. The preventive action to be taken to prevent a future re-occurrence.
6. Close-out timescale for implementation of all actions.

Incidents

For incidents involving MJ Conroy Construction, the company incident investigation form will be completed.

The investigation of the incident must identify;

1. The immediate actions taken as a result of the incident.
2. The immediate corrective actions to be taken to prevent recurrence.
3. The immediate causes of the incident.
4. The root causes of the incident.
5. The preventive action to be taken to prevent a future re-occurrence.
6. Close-out timescale for implementation of all actions.

Dangerous Occurrence

In the event of a Dangerous Occurrence which involves MJ Conroy Construction and which under the Safety, Health and Welfare at Work (Reporting of Accidents and Dangerous Occurrences) Regulations 2016 is reportable to the Health & Safety Authority, then MJ Conroy Construction will report all such occurrences as set out in the Regulations.

Accident Reporting Procedure – Statutory Requirement

In compliance with the Safety, Health and Welfare at Work (Reporting of Accidents and Dangerous Occurrences) Regulations 2016 (S.I. No. 370 of 2016) the following key points in relation to reporting of accidents to the Health

and Safety Authority will be complied with:

- Only fatal and non-fatal injuries are reportable. Diseases, occupational illnesses or any impairments of mental condition are not reportable.
- Fatal accidents must be reported immediately to the Authority or Gardaí. Subsequently, the formal report should be submitted to the Authority within five working days of the death.
- Non-fatal accidents or dangerous occurrences should be reported to the Authority within ten working days of the event.
- Injuries to any employee as a result of an accident while at work where the injury results in the employee being unable to carry out their normal work duties for more than three consecutive days, excluding the day of the accident, must be reported to the Authority.

It is the responsibility of M. J. Conroy Construction to report any reportable accidents to the Health and Safety Authority in respect of injury to any of their direct employees.

It is the responsibility of subcontractors to report reportable accidents to the Health and Safety Authority in respect of injury to any of their direct employees and issue MJ Conroy Construction with a copy of the report.

Review Process

In respect of all accident, incident and dangerous occurrence investigations, identified correctives/ preventative actions must be evidenced as having been complete within the timeframe specified in the reports.

12.5 Personal Protective Equipment

- It is the policy of MJ Conroy Construction that where a risk is unavoidable, then personal protective equipment must be worn.
- Any employee observed carrying out any process which requires the use of protective clothing or equipment will be informed of statutory and Company requirements and instructed not to continue working until protective clothing or equipment is obtained. This also applies to any Sub-Contractors.
- MJ Conroy Construction will provide personal protection equipment to its employees and this equipment must be worn.
- Should employees fail to wear the personal protection equipment supplied to them, the company safety disciplinary procedures as detailed in this EHS Statement will be applied.

12.6 Hazardous Substances. CLP Regulations

The Classification, Labelling and Packaging (CLP) regulations covers hazardous chemicals sold on the market. All hazardous chemicals (substances and mixtures) must be classified, labelled, and packaged in accordance with the CLP Regulations (EC) no. 1272/2008.

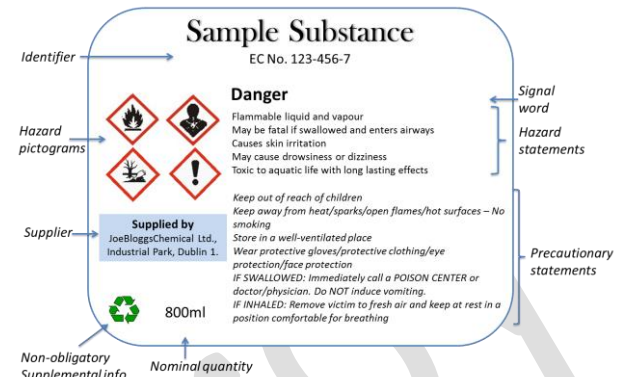
It is the responsibility of MJ Conroy to ensure that employees are made aware of the classification of such products used by them as part of their works to allow them to identify the hazards and the necessary controls to allow the safe handling, use and storage of such products.

Any chemical hazard identified must be communicated by pictogram symbol on a hazard label on the product (reference figure 1 below). Noting the new pictograms replaced the square orange and black 'Chip' symbols by the transition period in 2017. The hazard label must contain obligatory information as shown in figure 2 below.

Figure 1

HAZARD SYMBOLS		
New pictogram	Hazard class (CLP)	Old 'Chip' symbol
	<ul style="list-style-type: none"> Explosives Self-reactive substances and mixtures, types A, B organic peroxides, types A, B 	 Explosive
	<ul style="list-style-type: none"> Flammable gases, aerosols, liquids/solids Self-reactive substances and mixes Pyrophoric liquids and solids Self-heating substances and mixes Substances and mixtures, which in contact with water emit flammable gases Organic peroxides 	 Highly/extremely flammable
	<ul style="list-style-type: none"> Oxidising gases, liquids and solids 	 Oxidising
	<ul style="list-style-type: none"> Compressed gases, liquids and solids Liquefied gases Refrigerated liquefied gases Dissolved gases 	No current symbol
	<ul style="list-style-type: none"> Corrosive to metals Skin corrosion Severe eye damage 	 Corrosive
	<ul style="list-style-type: none"> Acute toxicity (Cat 1-3) 	 Toxic/very toxic
	<ul style="list-style-type: none"> Acute toxicity (Cat 4) Skin and eye irritation Skin sensitisation Specific target organ toxicity Respiratory tract irritation Narcotic effects 	 Harmful/irritant
	<ul style="list-style-type: none"> Respiratory sensitisation Germ cell mutagenicity Carcinogenicity Reproductive toxicity Specific target organ toxicity Aspiration hazard 	 No current specific symbol Use either
	<ul style="list-style-type: none"> Hazardous to the aquatic environment 	 Dangerous for the environment

Figure 2



12.7 Asbestos Awareness Policy

Survey

For buildings constructed prior to 2000, MJ Conroy will request from the client or their representative, an asbestos survey report prior to commencement of construction works. Where none is available one will be commissioned using a competent surveyor by MJ Conroy prior to commencing any works.

There are two different types of asbestos surveys. An **asbestos management survey** is the standard survey. It looks for asbestos in areas that can be seen and are accessible. However, for renovations or demolitions, a **demolition and refurbishment survey** is required. This type of survey is more invasive than a management survey. It requires a destructive inspection on all areas where work or demolition is to be carried out.

The site induction will include details of the location of any asbestos identified. It will also reiterate the process to follow should any further suspect materials be found on site.

Asbestos Register

On sites where asbestos containing material (ACM) is identified as part of a survey, an asbestos register is required to be maintained. MJ Conroy will request a copy of the asbestos register from the client as part of the survey request. The register will be reviewed and revised if further asbestos is identified at the workplace; or asbestos is removed from, disturbed, sealed, or enclosed, at the workplace.

The register shall be made accessible to all staff, Health and Safety Representatives and workers carrying out work, intending to carry out work, or whom may have carried out work at the workplace where asbestos may be present. When MJ Conroy hands over control of a workplace it will transfer any asbestos register and survey it commissioned for that workplace as part of the handover safety file.

Management Plan

If asbestos is identified as part of an asbestos survey on a building but it is not being removed, then an Asbestos Management Plan must be developed. This plan sets out the actions being taken within the building to manage ACMs in accordance with current regulations and best practice guidance. A copy of this plan and the asbestos survey and register must be made available by the client or their representative to MJ Conroy. MJ Conroy will make this available to all staff, especially Health and Safety Representatives and workers carrying out work, and those intending to carry out work at the workplace.

Management & Abatement

Only subcontractors and workers who are qualified and licensed and formally trained in accordance with relevant legislation, codes of practice and regulations shall be permitted in the management and abatement of any asbestos containing materials (ACMs).

12.8 Consultation on Environmental Health and Safety Issues

- Employees have the right to elect a Safety Representative, and it is the policy at MJ Conroy Construction to facilitate this right.
- It is policy within MJ Conroy Construction to facilitate the election and working of Site Safety Representatives where this company is Project Supervisor for Construction on projects where there are normally more than 20 people working. Where acting as sub-contractor, MJ Conroy Construction, will co-operate with the Project Supervisor for Construction regarding the operation of the Site Safety Representative.
- All employees will be actively encouraged to report any safety concerns without any fear of disadvantage.
- If deemed necessary, MJ Conroy Construction will establish a safety committee on specific projects where it is appointed Project Supervisor Construction Stage. This committee will comprise of representatives from the principal contractors on site. The committee will meet at regular intervals during the project duration and consult with the Project Supervisor Construction Stage on health and safety concerns and performance. Details pertaining to the arrangements of a safety committee will be detailed in the EHS Construction Safety Plan for the specific project.
- The company QEHS Manager will meet with site management and safety representatives on site as part of site EHS audits to discuss matters of concern to both parties and to follow up on previously highlighted EHS issues to ensure they are closed out.
- Regular toolbox talks will be given on site which must be attended by company employees.

- Site EHS induction will be given on sites where MJ Conroy Construction is Project Supervisor Construction Stage. Details on the induction will be contained in the EHS Construction Stage Plan.
- All employees will be issued with a copy of the company EHS policy and EHS Handbook annually.
- A copy of the Company EHS Statement is made available on the company portal for all employees to view.
- Information on construction EHS matters will be posted on the information notice boards on M.J. Conroy sites.
- Employees are periodically issued a company QEHS electronic newsletter (Ezine) by email.
- Employees undertaking specific work will where necessary be brought through a risk assessment method statement or Safe Plan of Action in advance of carrying out the work.
- Employees must attend EHS training courses which the company requests them to attend.
- A training file is maintained on HammerTech and is reviewed periodically to reflect training carried out and future training requirements to meet both company and legislative requirements.
- As part of MJ Conroy Constructions operational environmental, health and safety (EHS) management system, an internal company EHS committee meet periodically to discuss matters on QEHS and as a forum of worker participation and engagement as defined under clause 5.4 of ISO 45001:2018.

12.9 Monitoring of Environmental, Health and Safety Performance

- Company management will monitor environmental, health and safety performance on a day-to-day basis.
- Employees are encouraged to report any unsafe items of plant or situations.
- Should any specific situation require it, arrangements will be made to appoint a competent EHS professional to provide advice.
- In the event of an accident incident or dangerous occurrence, the company investigation procedure as outlined in this EHS Statement will be adhered to determine the cause and identify the corrective actions that may have to be taken to prevent a re-occurrence.
- Evaluation of the EHS performance of subcontractors engaged by the company will be carried out as part of overall subcontractor evaluation for individual projects. This evaluation is carried out under the ISO 9001 company procedures.

12.10 EHS Information & Training

- It is recognised that ongoing EHS information and training must be provided to maintain a high standard of service and care.
- MJ Conroy Construction will provide information / training to personnel as required. Including Solas Safe Pass to all employees who are required to hold a card, plant and machinery training, manual handling and abrasive wheel training.
- Training must take account of any new or changed risks to EHS and be repeated periodically and employees must be given time with pay to attend the training.
- Information, instruction, training and supervision in EHS will be given in a manner, form and language understood by the employee.
- All employees will receive site EHS induction training and ongoing toolbox talks during projects.
- The relevant information in the EHS Statement will be brought to the attention of employees on their commencement of employment with the company and at least annually thereafter through the issuing of a copy of the company EHS handbook.
- It is the policy of MJ Conroy Construction that personnel under the company's control who are required to operate plant and equipment will be competent and have the necessary training to do so.

12.11 COVID-19 (Coronavirus) Policy

Coronavirus (COVID-19) is a health pandemic, which first became known globally in early 2020. It is a virus that affects the lungs and airways. As this health emergency evolves, the protocols and advise in place by the company will have to revised and updated accordingly.

Each construction site and head office operations will be governed by COVID-19 safety protocols, developed by MJ Conroy which outlines the requirements to ensure the protection of the workforce and minimise the spread of the infection.

The Library of Risk Assessments (SP 25) document will also be continually updated when required to include specific COVID-19 Risk Assessment.

MJ Conroy hopes that our response to this outbreak will be measured, managed, and controlled proactively because of this policy. It is designed to ensure everyone acts pragmatically and proactively to ensure the health and safety of all employees and to maintain business continuity at this time.

MJ Conroy is morally and legally obliged to take reasonable steps to ensure the safety, health and welfare of all employees, clients, visitors, and the public.

MJ Conroy will take all necessary and appropriate measures to fulfil our duty of care and protect the health of our employees and comply with regulations set out in the Health, Safety and Welfare Act, 2005, all other legislative as well as government and industry issued guidance and advise.

MJ Conroy Construction commits to:

1. Closely monitoring local conditions and developments along with national and international news, as the coronavirus situation continues to evolve.
2. Deciding on an ongoing basis if the instructions we have given employees are appropriate or if we need to order further measures.
3. Provide Covid-19 Induction training to all employees.
4. Making sure that employees are aware of our policies, protocols and practices that apply to our workplace and clients workplace, as outlined in our specific office and site Covid-19 Safe Work Protocols.
5. Continuing to provide a safe place and system of work and ensuring that common work areas are clean and cleaned regularly and that clean hand washing facilities are available.
6. Issuing regular advisories concerning hygiene and best practice in the workplace to employees in accordance with up-to-date government and industry advise.

12.12 Work Life Balance Policy

In accordance with the provisions of the Work Life Balance and Miscellaneous Provisions Act 2023, MJ Conroy are committed to supporting work life balance working arrangements where the role is deemed suitable to facilitate this.

Flexible Working

This is a working arrangement where an employee's working hours or working patterns are adjusted, including through the use of remote working arrangements, flexible working schedules or reduced working hours. Flexible working depends on the nature of the role and/or business. Employees can request flexible working arrangements if they have children, or caring responsibilities for a person requiring significant care or support for a serious medical reason.

Remote Work Arrangements

Remote working is where an employee works all or part of their working week at a location remote from the workplace, which may be the employee's home. Depending on the suitability of the role, there are a number of types of remote working arrangements that would be considered

Refer to Section 4.14 of the Employee Handbook for details on this Policy.

12.13 Pregnancy and Breastfeeding Workers

If an employee notifies the company that she is pregnant, has recently given birth or is breastfeeding, the company will complete a Risk Assessment for Pregnant and Breastfeeding Workers (Form No. MJC- S71).

The completion of the risk assessment will be the basis for determining if there are risks that could impact on both the mother and the unborn child and the measures to be taken to avoid where possible, injury or ill health.

If the risks cannot be reduced sufficiently or eliminated, the company may give the employee Health and Safety leave. During Health and Safety leave, the employee will receive payment from the company for the first 3 weeks, after which the employee may be entitled to Health and Safety Benefit, depending on PRSI contributions.

The employee is obliged to inform MJ Conroy of changes to their pregnancy or breastfeeding requirements which may affect their ability to conduct their role or might deem their previous risk assessment void.

For further information refer to the company Employee Handbook.

12.14 Menopause Policy

MJ Conroy Construction is committed to ensuring that all individuals are treated fairly and with dignity and respect in their working environment. It is also committed to ensuring our people are safe, healthy and well both physically and psychologically. We aim to promote Diversity, Inclusion and Equality, ensuring staff feel confident to raise issues about their menopausal symptoms without fear of discrimination.

This policy is designed to raise awareness of perimenopause and menopause, to provide information and support to those affected.

Refer to Section 4.16 of the Employee Handbook for details on this policy.

Part 13 - EHS Inspections / Audits**13.1 Company EHS Inspections**

The company EHS Director or QEHS Manager and site management as required carry out EHS inspections on all sites where the company carries out work.

These inspections are carried out as often as deemed necessary, taking into consideration the size, complexity and location of the project.

The inspection is recorded on a detailed EHS inspection form (Form MJC-S09a) or as an observation on HammerTech or through a Task Spot Check, again via HammerTech. The findings of the inspection are advised to the site supervisor(s) and corrective actions identified for close out.

Action items identified in the inspection must be closed out and confirmation issued via HammerTech confirming the close by the required date.

Where requested, a copy of the inspection is issued to the Client, PSDP or PSCS.

13.2 Independent EHS Inspections

MJ Conroy Construction sites are subject to periodic independent inspection on behalf of MJ Conroy Construction's liabilities insurance company.

These inspections are carried out by an inspector appointed by the insurance company.

The inspector makes the necessary arrangements with the company EHS director or QEHS Manager in advance.

The inspector is accompanied on their inspection by the company EHS director or QEHS Manager and site supervisor.

The inspector reviews all site EHS documentation and conducts a site audit by undertaking a site walk about.

The inspection report is issued directly to the insurance company by the inspector and a copy of the report recommendations and requirements is then issued to MJ Conroy Construction.

Action items which may be identified in the inspection report must be addressed by the specified date and confirmation issued to the insurers that the items have been closed out.

13.3 Safe-T-Cert & ISO Audits

These audits are conducted annually as part of the requirements of both Safe T Cert and ISO standards.

The relevant auditor is accompanied to site by the company EHS director and, or QEHS Manager.

The auditor conducts a review of all applicable EHS documentation and conducts a site inspection by undertaking a site walk about.

The findings of the site visit are reported in the auditor's report, details of which are gone through with the EHS director and or QEHS Manager at the conclusion of the audit and issued formally thereafter by the auditing company. The recommendations and action items detailed in the report must be addressed as appropriate.

Part 14 – EHS Training & Induction

14.1 EHS Training

The company carries out regular training for its employees where required. Training is carried out to ensure that personnel are qualified, competent, and made aware of EHS issues.

Training is carried out either in-house or by external bodies that provide specialist training.

Training records are maintained for each employee on HammerTech.

Training requirements are routinely reviewed and necessary training to meet company on-going needs and changes to EHS legislative requirements is scheduled accordingly.

14.2 EHS Induction

MJ Conroy Construction site operatives are required to attend site EHS induction which is organised by the company on sites where it is PSCS. On sites where MJ Conroy is not PSCS, operatives must complete induction organised by the appointed PSCS for that site.

MJ Conroy Construction's induction process is split into two parts, firstly all operatives must complete company induction on HammerTech. To complete this, a link is issued to all operatives allowing them to complete the induction and to upload their training records on completion. Secondly, site-specific EHS requirements which outlines information pertaining to site rules, emergency plans, first aid arrangements, project details and logistics are advised by site management on arrival to site.

All subcontractor operatives must complete MJ Conroy Construction site induction.

14.3 EHS Toolbox Talks

Toolbox talks are held on site on an on-going basis. Toolbox talks present the opportunity to discuss current matters of EHS concern in the construction industry and topics which are relevant to the site.

Topics relevant to each individual site or to the industry and topical can also be discussed such as changes to site emergency response procedures, changes to site demarcation, safety alerts and incidents or accidents which have occurred and details of which need to be discussed with operatives on individual sites.

Toolbox talks also present the opportunity to discuss or raise issues by those in attendance relevant to EHS the site.

The duration is approximately 10 minutes. Talks are given by the QEHS Manager and or Site Supervisors.

Details of all Toolbox talks including signature of all attendees must be recorded in the Toolbox Talk Log sheet (Form MJC-S33) and uploaded to the project file on HammerTech along with any details of the topics discussed.

Part 15 - Risk Assessment Method Statements & Safe Plans of Action

15.1 Risk Assessment Method Statements (RAMS)

MJ Conroy Construction produce RAMS in advance of work activities for which they are deemed necessary. This may be due to the heightened risk associated with the works, due to its complexity, location or requirements of the client, PSCS or PSDP on the project to produce a RAMS.

MJ Conroy Construction has a RAMS layout template, form MJC-S17.

RAMS are prepared by site management or the QEHS Manager. Details in the RAMS must be reviewed and signed in advance, electronically on HammerTech by the operatives carrying out the work. RAMS must if requested be issued in advance to the client or/ and PSCS.

15.2 Safe Plan of Action

A Company Safe Plan of Action (Form MJC/S46) is used for works which need a written assessment in advance owing to the location of the works, primarily in a 'live' work area occupied by other personnel but for which a method statement is not deemed necessary. A Safe Plan of Action is completed and signed off by the operatives carrying out the work on HammerTech and is approved by site supervisor or QEHS Manager.

15.3 RAMS Register

A RAMS register can be developed each project on HammerTech.

Part 16 - Co-Operation from Employees

- There is a duty on all employees of MJ Conroy Construction to comply with the company EHS systems and to take care of their own safety and that of others whilst at work and to co-operate with the employer to ensure a safe workplace.
- To this end, employees of MJ Conroy Construction must;
 - Wear the personal protective equipment provided by the employer.
 - Work in a safe manner.
 - Abide by safety instructions.
 - Advise the employer of any defective plant.
 - Report accidents and or incidents (safety and environmental).
 - Not interfere with safety devices.
- Failure by any employee to comply with EHS requirements will result in disciplinary action as outlined in the procedure below.

Part 17- EHS Disciplinary & Behavioural Procedure

Under the company EH&S disciplinary and behavioural procedure a breach is categorised by its severity into a minor, medium or high category breach.

A minor category breach will result in the offender;

- receiving a verbal warning and written warning

The breach shall be recorded on the site disciplinary register

Any person caught in repeat of a minor category offence will have their punishment automatically escalated into a medium category breach.

A medium category breach will result in the offender;

- receiving a verbal and written warning
- being requested to leave site for the remainder of that day
- on return to site the person must re-attend site induction training
- If the offender is an employee of a sub-contractor, the sub-contractor supervisor/management will be notified of the breach.

The breach shall be recorded on the site disciplinary register and may be reflected in the sub-contractors evaluation.

Any person caught in repeat breach of a medium category offence will have their punishment automatically escalated into a high category breach.

A high category breach will result in the offender;

- being suspended immediately from site for a minimum of *3 days (possibly permanent dismissal).
- on return to site the person must re-attend site induction training
- If the offender is an employee of a sub-contractor, the sub-contractor supervisor/management will be notified of the breach and will be asked to attend a “please explain” meeting.

The breach shall be recorded on the site disciplinary register and may be reflected in the sub-contractors evaluation.

*The 3-day suspension will be subject to MJ Conroy Construction management review. This review may decide that the offender be dismissed permanently from site.

Safety breaches shall be held on record for a six-month period.

This procedure will apply on all MJ Conroy Construction sites including sites where MJ Conroy Construction undertakes the role of Project Supervisor Construction Stage. It shall apply to all MJ Conroy employees, all site management/ supervisors and all site personnel including all subcontractors.

Details on the procedure will be outlined in the Construction Stage EH&S Plan, MJC online site safety induction and site-specific orientation.

Personnel observed as performing positive acts on site shall be issued with a behavioural notice indicating a positive observation and be entered into any site organised incentive draw.

Part 18 - New Employees

- Employees will be issued with personal protective equipment.
- The employee will be put under the supervision of an experienced worker and their competency evaluated over a probation period.
- All site operatives will be required to have completed the SOLAS Safe Pass and Manual Handling as mandatory.
- Office and administration staff require Manual Handling and Ergonomic training.
- The employee will receive company induction and be issued with a copy of the company employee handbook and company EHS handbook when issued with their contract of employment.

Part 19 - Harassment, Sexual Harassment and Bullying Policy

MJ Conroy Construction believes that every employee has the right to work in an environment free from acts of harassment, bullying, sexual harassment or victimisation in order to ensure that all employees are treated with dignity and respect. This behaviour will not be tolerated and may lead to disciplinary action for employees and suspension of custom for non-employees. All employees are required to comply with this policy and appropriate action will be taken against any employee who violates this policy. We expect all employees to contribute proactively to the creation of a working environment in which everyone is treated with dignity and respect irrespective of gender, sexual orientation, marital or family status, racial group, religion, disability, age or membership of the travelling community. This policy applies to all full-time and part-time employees in the workplace and at work associated events.

All employees should note that allegations of harassment, sexual harassment, victimisation or bullying are treated seriously. M J Conroy & Sons Ltd commits to ensuring that complaints by employees will be treated with fairness and sensitivity and as confidential as possible. Prompt action will be taken to investigate complaints by individuals directly affected by the behaviour or complaints raised by Management. Where there is a breach of policy, Disciplinary Action will be taken, as appropriate, which may include summary dismissal.

There are certain forms of unacceptable behaviour which are clarified below:

Harassment is defined as any act or conduct which is unwanted and unwelcome and which could reasonably be regarded as offensive, humiliating or intimidating on the grounds of gender, marital status, family status, sexual orientation, religion, age, disability, race or membership of the traveller community. Examples of harassment include:

- Production, display or circulation of offensive material
- Malicious gossip
- Racist jokes or comments
- Offensive gestures
- Ignoring or excluding a person within the workplace
- Verbal threats

Third Party Harassment is if an employee suffers harassment from a customer, supplier etc. The employee should inform Management who will take appropriate action to ensure that the harassment does not continue. There is an obligation on Management to inform the alleged harasser that this conduct is not acceptable by the Company.

Sexual Harassment is any form of verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person. The unwanted conduct may consist of acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material. Examples of sexual harassment include:

- Unwelcome sexual attention
- Lewd behaviour, sexual mockery or innuendo
- Staring or leering
- Displaying sexually suggestive objects, pictures, calendars, publications, literature
- Unwelcome physical contact ranging from touching to assault
- Offensive letters, notes or use of technology

Bullying is defined as repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others at work, which could reasonably be regarded as undermining the individuals right to dignity at work. An isolated incident of this behaviour may be an affront to dignity at work but, as a once off incident is not considered to be bullying. Examples of bullying include:

- Continually excluding an individual by only talking to a third party in order to deliberately isolate that person
- Taking credit for another persons work or ideas
- Public humiliation
- Constantly undervaluing effort of another
- Verbal abuse or threats
- Persistent or unfounded criticism.

Victimisation is where an individual is given less favourable treatment than others in the same circumstances because he or she has made allegations or complaints of discrimination, harassment or bullying or provided information about such allegations or complaints. This includes making life difficult for a person, general unpleasantness and blocking promotion opportunities.

There are specific procedures in place for any employee who has a grievance or a complaint of harassment or bullying Prompt action will be taken to investigate any complaints received. Where there is a breach of policy, Disciplinary Action will be taken as appropriate, which may include summary dismissal.

19.1 Complaints Procedures

There is an informal and formal procedure to deal with the issue of harassment and bullying at work.

Informal Procedure

It is often preferable that allegations of harassment and bullying are dealt with informally if possible. The informal procedure is likely to produce solutions, which are speedy, effective and minimise embarrassment. The accused employee may be unaware that his or her actions are inappropriate, or these actions may have been misinterpreted. Every attempt should be made to clear up the misunderstanding quickly, on an informal basis. The complainant may:

- Approach the harasser with a colleague
- Make a written approach to the harasser
- Ask a colleague or senior employee to informally approach the harasser

Formal Procedure

It may not always be practical to use the informal procedure particularly where the harassment or bullying is serious or where the individuals involved are at different levels in the Company. In such circumstances the employee should use the formal procedure

- The complaint should be in writing naming the alleged perpetrator/s and signed by the complainant. It should detail the incidents and identify any witnesses.
- It should be submitted within one month of the alleged incidents to the immediate Supervisor or Manager or their superior if they have been named in the complaint.
- The alleged perpetrator/s will be notified in writing of the details of the allegation and afforded the right to reply.

- A Manager will interview the complainant to determine course of action, e.g. exploring a mediated solution or attempt to resolve the issue informally.
- If an informal approach is inappropriate, a formal investigation of the complaint will be conducted to determine the facts and credibility of the allegations.
- All involved in the investigation must respect the need for confidentiality and failure to do so may represent a Disciplinary Action offence.

19.2 Investigation

- A Manager or agreed third party should conduct the investigation. It should be conducted thoroughly, objectively, with sensitivity, confidentiality, and due respect for the rights of the complainant and alleged perpetrator/s.
- The investigator should meet with the complainant, alleged perpetrator/s and any witnesses individually to establish the facts of the allegations.
- If desired, the complainant and alleged perpetrator/s may be accompanied
- Every effort will be made to complete the investigation quickly. On completion, a written report with the findings of the investigation will be submitted to the Department Manager.
- The complainant and the alleged perpetrator/s will be informed in writing of the findings of the investigation.
- Both parties will be given the opportunity to comment on the findings of the investigation before any action is decided upon.

Outcome

- Should the Manager decide that the complaint is well founded, the perpetrator/s should be given a formal interview to progress the issue through the Disciplinary Action Procedure
- If the complainant is dissatisfied with the outcome of the investigation, they may appeal the decision within 5 working days in writing to the Managing Director
- The MD will consider the appeal, and the decision will be issued within 5 working days. The decision of the MD is final and will be issued in writing.

Part 20 - Mental Health and Wellbeing Policy

Definition of Mental Health

Our definition of mental health is: A state of well-being in which the individual realises his or her own abilities, can cope with the normal stresses of life, can work productively and fruitfully and is able to make a contribution to his or her community. (World Health Organisation, WHO).

Statement of Commitment

We understand that mental health is impacted on by a range of factors, including the working environment and our workplace relationships with others. As such we are committed to:

- Actively promoting positive mental health.
- Enabling individuals to develop and manage their own mental health.
- Helping those experiencing mental health difficulties to recover.
- Building and maintaining organisational systems that impact positively on mental health, promote equality and reduce stigma around mental health.

Values

The values that inform our behaviour in relation to mental health mirror our organisational values, including respect, equality and consideration for all.

Policy Objectives

The objectives of this policy are to:

- Outline how the company complies with legal obligations contained in the Employment Equality Acts 1998–2011 and the Health, Safety and Welfare at Work Act 2005.
- Raise awareness across the organisation about the importance of promoting mental health in the workplace.
- Eliminate or reduce organisational risk factors in relation to mental health (e.g. bullying, stress, discrimination or harassment), wherever possible.
- Enable positive mental health and equality in practice through the provision of timely and appropriate reasonable accommodation and supports for individuals who are experiencing mental health difficulties or mental illness.

Legal Responsibilities

We are fully committed to complying with our responsibilities under the Employment Equality Acts 1998–2011. We recognise that mental health difficulties (e.g. stress, anxiety and depression) are covered by the Disability ground under the Employment Equality Acts, and we are committed to the provision of reasonable accommodation, where appropriate and necessary. We are also committed to our legal responsibilities under the Safety, Health and Welfare at Work Act 2005, including identifying and assessing psychosocial risk (e.g. stress or bullying), and reducing such risks.

In the event that we are aware of individual employees with mental health difficulties we will work with them to identify particular risks and seek to implement measures to reduce those risks. This policy should be read in conjunction with our Occupational Health and Safety Policy and Commitment and our Employee Handbook for further information.

Disclosure

We are committed to working positively with anyone disclosing information about their mental health difficulties, so that we can identify what may help them to function productively in work.

We are committed to respect for individual privacy and confidentiality. Information that is disclosed to us will be stored in accordance with our legal responsibilities under the Data Protection legislation.

Reasonable Accommodation and Support

We will support any employee requesting our help on the grounds of disability and (in this case) mental health difficulties, in compliance with the Employment Equality legislation.

MJ Conroy provides employees with the support services of LAYA Healthcare Mental Health and Wellbeing Employee Assist Programme. The programme is made available to all employees and their family members over the age of 16 years. It is available 24/7, 365 days of the year. It is a confidential telephone and web-based programme.

And through the Construction Industry charity, The Lighthouse Club, a 24/7 confidential telephone support service is available to all employees and workers in the industry.

Part 21 – Right to Disconnect Policy

Introduction

The health and wellbeing of our employees is of the utmost importance to us and we encourage and support our employees to prioritise their own wellbeing. Disconnecting from work is vital for your wellbeing, and to help you achieve a healthy and sustainable work-life balance.

The organisation recognises that every employee is entitled to switch off outside of their normal working hours and enjoy their free time away from work without being disturbed, unless there is an emergency or agreement to do so.

To encourage and support our employees in balancing their working and personal lives whether they work traditional hours in the workplace, work remotely or flexibly, we have adopted a 'Right to Disconnect' company policy, which includes best practice guidance around wellbeing, working hours, the use of technology and more.

What is the Right to Disconnect?

The Right to Disconnect refers to an employee's right to be able to disengage from work and refrain from engaging in work-related electronic communications, such as emails, telephone calls or other messages, outside normal working hours. In summary, the Right to Disconnect has three main elements:

1. The right of an employee to not routinely perform work outside normal working hours.
2. The right to not be penalised for refusing to attend to work matters outside of normal working hours.
3. The duty to respect another person's right to disconnect (e.g., by not routinely emailing or calling outside normal working hours).

Employer and Employee Obligations

The creation of a culture in which employees feel they can disconnect from work and work-related devices necessitates a joint approach by both the company and our employees. Detailed below is an outline of both employer and employee obligations in order to enable such a culture.

Employer obligations

- Providing detailed information to employees on their working time, in accordance with the Terms of Employment Information Act, 1994 – 2014, by way of a contract of employment.
- Ensuring that employees are informed of what their normal working hours are reasonably expected to be under the Employment (Miscellaneous Provisions) Act 2018.
- Ensuring that employees take rest periods, in accordance with the Organisation of Working Time Act, 1997.
- Ensuring a safe workplace, including reviewing our risk assessment and, where necessary EHS Statement in line with the Safety, Health & Welfare at Work Act, 2005 and taking account of our obligations under section 8(2)(b) of the Safety, Health & Welfare at Work Act, 2005 which extends to 'managing and conducting work activities in such a way as to prevent, so far as is reasonably practicable, any improper conduct or behaviour likely to put the safety, health and welfare at work of his or her employees at risk'.

- Not penalising an employee for acting in compliance with any relevant provision or performing any duty or exercising any right under section 27 of Safety, Health & Welfare at Work Act, 2005.

Employee Obligations

- Ensuring that you manage your own working time as per your contract or to the best of your ability.
- Taking reasonable care to protect your safety, health and welfare and the safety, health and welfare of co-workers while at work, in line with section 13(1)(a) of the Safety, Health & Welfare at Work Act, 2005.
- Cooperating fully with any appropriate mechanism utilised by the company to record working time including when working remotely.
- Notifying your employers and managers in advance of annual leave via company portal and where possible or applicable change voice mail or company email to automatic response.
- Being mindful of your colleagues', customers'/clients' and all other people's right to disconnect (e.g., by not routinely emailing or calling outside normal working hours).
- Notifying management in writing of any statutory rest period or break to which you are entitled to and were not able to avail of on a particular occasion and the reason for not availing of such rest period or break.
- Being conscious of your work pattern and aware of your work-related wellbeing and through consultation and communication with your employer take remedial action if necessary.

The Role of Managers

Managers play a central role in the successful implementation of this Right to Disconnect policy. It is expected that Managers will respect the Right to Disconnect of their team members and should demonstrate clear commitment to the Policy through leadership and being active role models in this respect.

Working Hours

Each individual employee's 'normal working hours' are outlined in their contract of employment. We, as a company, strive for a culture whereby our employee's wellbeing is of paramount importance, and with that we encourage and expect that staff disconnect from work emails, messages, etc., outside of their normal working hours and during annual leave. However, legitimate reasons where it is necessary to contact staff outside of normal working hours, can include the following:

- Ascertaining availability for rosters;
- To fill in at short notice for a sick colleague;
- Where unforeseeable circumstances may arise;
- Where an emergency may arise;
- Where business and operational reasons require contact out of normal working hours.

The above is a non-exhaustive list.

In certain circumstances, business and operational needs may dictate that there will be situations which clearly require some out-of-hours working by some employees depending on the service being provided, the employee's role, the needs of customers/clients, working across global time zones and the unique requirement of critical services. Receiving communications from another time zone does not necessarily mean that you need to respond in the same time period. Expectations will be communicated in relation to responding to digital communications globally, where appropriate.

All employees within the company may not have the same normal working hours. Some may work a more traditional hourly pattern (for example, 7.30am to 4.30pm or 9.00am to 5.30pm) and others may work flexibly or have varying working time patterns. This Policy is in place to ensure all employees are aware that they have the right to disconnect.

Employee Wellbeing

Employees working from home are encouraged to schedule post-work leisure activity, in order to create some separation from the end of their workday and the beginning of their personal time.

Employees, including those engaging in flexible working arrangements or remote working are reminded to switch off from work, to monitor their working hours and to take breaks, away from work devices, in accordance with the Organisation of Working Time Act 1997.

Raising Concerns

While being conscious of the fact that due to business and operational needs and depending on a number of factors, including the role of the employee, customer/client needs, nature of the business, global reach of the employer, that circumstances may arise that necessitate that communications are sent and received outside of employee's normal working hours. However, when contact outside normal working hours becomes the norm, this needs to be addressed.

Best practice suggests that employees should attempt to resolve the problem with the person(s) informally in the first instance. In circumstances where an employee feels that it would be too difficult to do this on their own, an alternative approach would be to seek support from, or for an initial approach to be made by their manager or a member of Human Resources.

If an informal process has not been successful in resolving the issue, then the formal company grievance procedure may be utilised.

Part 22 - Smoking & Vaping Policy

- On 29th. March 2004, Section 47 of the Public Health (Tobacco) Acts, 2002 and 2004, came into force to protect workers and third parties from the ill effects of second-hand smoke.
- It is policy of MJ Conroy Construction that all workplaces are smoke free and that all employees should have a right to work in a smoke free environment.
- To comply with this requirement, smoking is forbidden in all MJ Conroy Construction workplaces.
- Similarly, the use of electronic cigarettes or 'vaping' products is not permitted in any MJ Conroy Construction workplace.
- Infringements by employees will be dealt with under the disciplinary procedures as detailed in this EHS Statement.
- On projects where MJ Conroy Construction is appointed Project Supervisor Construction Stage, infringements on the site will be dealt with under the disciplinary procedures as detailed in this EHS Statement.
- The smoking arrangements on site where MJ Conroy Construction is appointed Project Supervisor Construction Stage will be detailed in the Health & Safety Plan Construction Stage and in site safety induction.

Implementation

Overall responsibility for policy implementation rests with site management being in charge of the workplace. All staff have an obligation to adhere to and facilitate the implementation of this policy.

Part 23 - Intoxicant Policy

- It is a legal requirement under the Safety, Health and Welfare at Work Act 2005 that all employees must ensure that they are not under the influence of an intoxicant or substance to an extent as to endanger his or her own safety or the safety of others.
- Use of alcohol, illegal drugs or controlled substances whether on or off site can adversely affect a persons work performance, efficiency, health and safety as well as posing a potential danger to the health and safety of other employees and others.
- Use of alcohol, illegal drugs or controlled substances whether on or off site can adversely affect a persons work performance, efficiency, health and safety as well as posing a potential danger to the health and safety of other employees and others along with risk of property loss or damage.

Rules:

- Possession of or use of alcohol or being under the influence of alcohol while on the job is prohibited.
- Operating or driving company plant or vehicles while under the influence of alcohol is prohibited.
- Possession or use of illegal or controlled substances or being under the influence of illegal or controlled substances while at work is prohibited.
- Distribution, sale or purchase of an illegal or controlled substance while at work is prohibited.

Any breach of the above rules constitutes gross misconduct, which may result in disciplinary action up to and including dismissal. MJ Conroy Construction may bring the matter to the attention of the Gardaí if appropriate.

Employees who are suffering from substance abuse or suspect another employee is suffering should contact their manager or supervisor who will deal with the case in a confidential manner and the company will provide a support mechanism where appropriate.

Employees are required to report to MJ Conroy if they are prescribed or are taking any medication that may impede or restrict their normal work to be carried out in a safe manner so as to endanger the safety, health or welfare at work of themselves or any other person.

Part 24 – Drive for Work Policy

Objectives of the policy

- To ensure that staff who drive vehicles in the course of their work demonstrate safe, efficient driving skills and other good road safety practices at all times.
- To maintain all company vehicles in a safe, clean and roadworthy condition to ensure the maximum safety of the drivers, occupants and other road users, and reduce the impacts of company vehicles on the environment – this also applies to personal vehicles used for work purposes.
- Under the safety, Health and Welfare at Work Act 2005, MJ Conroy Construction has a duty as an employer to protect the health and safety of company employees who drive for work and other road users and pedestrians who may be affected by such company employee work activities.
- This policy governs the use of company vehicles or employees' own vehicles, where employees receive an allowance from MJ Conroy Construction for mileage driven. This policy also governs vehicles leased or hired by the company.
- This policy does not govern any person who drives to and from work in their own privately-owned vehicle.
- Failure to comply with this policy may lead to company disciplinary action being taken.

Responsibilities as an employee

Every driver of a company vehicle will:

- Ensure they hold a current driver licence for the class of vehicle they are driving and this licence is carried when driving a company vehicle.
- Immediately notify their supervisor or manager if their driver licence has been suspended or cancelled or has had limitations placed upon it.
- Be responsible and accountable for their actions when operating a company vehicle or driving for the purposes of work.
- Ensure they wear any necessary eyewear.
- Display the highest level of professional conduct when driving a company vehicle.
- Regularly check the oil, tyre pressures, radiator and battery levels of company vehicles they regularly use and record these checks on the form MJC-S42, *Vehicle Walkaround Checklist*.
- Comply with traffic legislation, rules of the road and respect other road users when driving.
- Assess hazards while driving and anticipate 'what if' scenarios.
- Drive within the legal speed limits, including driving to the conditions.

- Wear a safety belt at all times.
- Never drive under the influence of alcohol or drugs, including prescription and over the counter medication if they could impair their alertness or judgement.
- Never smoke in a company vehicle.
- Avoid distraction when driving – the driver will adjust car stereos/mirrors etc. before setting off and switch off their mobile phone for the duration of the journey.
- Report any near-hits, crashes and scrapes to their manager, including those that do not result in injury, and follow the crash procedures outlined in this policy.
- Report infringements to a manager at the earliest opportunity.
- Report vehicle defects to a manager before the next vehicle use.
- All loads must be adequately secured before commencing the journey.
- The employee must not carry loads for which the vehicle is unsuited, nor may they carry more passengers than for whom there are seat belts.

In addition, it is required that all drivers:

- Take regular and adequate rest breaks.
- Stop when tired
- Plan their journeys, taking into account pre-journey work duties, the length of the trip and post-journey commitments

If an employee is driving their own vehicle for the purposes of work, the same policies apply. In addition:

- The employee must seek the employer's agreement before using their vehicle for work
- The car must be legally registered, warranted and insured for the purposes of work – the employee must show evidence of this on request
- The vehicle must not be used in conditions for which it was not designed (such as off-road).

Responsibilities as an employer

MJ Conroy Construction will take all steps to ensure company vehicles are as safe as possible and will not require staff to drive under conditions that are unsafe and/or likely to create an unsafe environment, physical distress, fatigue, etc.

MJ Conroy Construction will do this by undertaking the following tasks:

Ensuring all vehicles are well maintained and that the equipment promotes driver, operator and passenger safety by:

- Servicing, inspecting and testing the vehicles according to manufacturers' recommendations and as required
- Setting up procedures where employees check vehicles' oil, water, tyre pressures and general cleanliness on a weekly basis, then record the inspections (form MJC-S42).
- Ensure that valid road tax, insurance and DOE test disks are provided and displayed at all times
- Ensuring that plant and machinery is driven only by those with the necessary training
- Ensuring appropriate insurance cover for using company owned vehicles is in place

Monitoring and managing work schedules to ensure they do not encourage unsafe driving practices by:

- Not requiring its employees to drive under conditions which are considered unsafe and/or create an unsafe situation

Identifying driver training needs and arranging appropriate training or retraining, including providing:

- A copy of this policy to all its employees and expect compliance at all times
- Specific practical and theory training as required and identified
- Regular staff Toolbox talks/refresher meetings on safety features, fatigue, driver responsibility, drink-driving, load security etc.

Procedure to be followed if there is a crash in a company vehicle

Immediately stop your vehicle at the scene or as close to it as possible, making sure you are not obstructing traffic. Ensure your own safety first. Help any injured people and call for assistance if needed. Contact company management at the earliest available opportunity.

Try to get the following information:

- Details of the other vehicle(s) and registration number(s)
- Name(s) and address (es) of the other vehicle owner(s) and driver(s)
- Name(s) and address (es) of any witness (es)
- Name(s) of insurer(s).

Give the following information:

- Your name and address and company details.

If you damage another vehicle that is unattended, leave a note on the vehicle with your contact details.

Contact the Gardaí:

- If there are injuries
- If there is a disagreement over the cause of the crash
- If you damage property other than your own

Policy review

This policy will be reviewed annually.

Part 25 - Severe Weather Working Policy

Purpose of the policy:

The policy is designed to deliver clear policy and procedures by the company to its staff whenever a Red Weather Warning is issued.

As employers, MJ Conroy Construction has a duty of care for all employees under the Safety Health and Welfare at Work Act, a key consideration needs to be whether, in the circumstances, it is safe to ask employees to travel to work, or to undertake their work.”

The procedure will address the company’s policy regarding attendance during a Red Weather Warning.

Definition:

A Red Weather Warning as defined by Met Éireann implies that recipients take action to protect themselves and/or their properties³; this could be by moving their families out of the danger zone temporarily; by staying indoors; or by other specific actions aimed at mitigating the effects of the weather conditions.

Notice:

Most adverse weather warning are issued in advance and adequate time is provided for all employees to take preventative and corrective measure.

The company will keep itself up to date with local and national weather forecasters and will advise all its staff by way of email, text, or phone as to its plans regarding what action and procedures must be taken.

Sudden Weather Changes:

From time-to-time conditions can be upgraded with short notice, going from Yellow to Amber or Red, in such circumstances the company will take efficient notice of the weather conditions and will take appropriate and coordinated decisions for each site.

³ <https://www.met.ie/7039-2#:~:text=%E2%80%9CA%20status%20red%20severe%20weather,within%20a%2048%20hour%20window.>

Adverse Weather Warning Codes:

The 3 different types of warning all depicted by colour and actions.

Yellow	Be aware. Severely bad weather is possible over the coming days
Amber	Be prepared. There is an increased likelihood of severely or extremely bad weather
Red	Take action. Extremely bad weather is expected

Reporting to Work:

In Red alert weather the company will decide on the course of action regarding who should attend work. If a staff member's position is not designated as essential, then he/she should not report to work or remain at work while the Red Alert Weather policy is in effect, regardless of his/her ability to report to work.

Decisions:

Once a decision is reached by the company a companywide communication will be issued, by the relevant appointed person as to the actions all staff must follow.

The type of actions:

- Attend work
- Stay at work
- Leave early
- Don't attend work
- Do not travel or plan to travel from (X date and time) to (Y date and time)
- Work from home

Staff Member Responsibility:

Each staff member is responsible for their own safety and that of other employees they work with and to ensure they do not cause by their action or conduct damage or injury.

All staff must engage fully with instruction provided by the company.

Employees shall not decide to take any action including refusing to follow instruction that serves to put at risk their safety, that of fellow colleagues or company property.

Planning:

1. Each employee regardless of their services in the company will be treated equally and afforded the same conditions regarding notice, closure, and remuneration benefits.
2. All staff must review the severe weather working policy.

Policy Activation:

1. Once the policy is activated, all employees must follow directions on severe weather procedures.

Options:

1. **A request to attend work;** the company will only issue such a request in adverse conditions if it is a critical matter to attend to that has the potential to cause damage that could result in loss of jobs or environment damage. However, were such a risk is posed, nonetheless it may still prove too dangerous for our employee to be in attendance. The company will in associating with the employees affected review the situation and the risk before allowing any employees to attend to the situation.

2. **Stay at home;** will require all staff not to attend the premises, in such circumstances, and in coordination with local and national advisory service information consider the duration of the embargo.

Conduct or Behaviour:

Employees are required to obey all companies policies and procedures, where a person commits an breach of any policy or where, there is in operation a Status Red severe weather warning (within the meaning of the Safety, Health and Welfare at Work Act 2005), he or she acts recklessly or without reasonable cause or excuse and engages in any activity that directly or indirectly, presents a danger to his or her own life or the life of any other person, or interfere with the ability of any emergency procedure of the company, or fails or refuses to obey reasonable instructions including failure or refusal to perform their functions. The matter may be deemed a serious offence capable of disciplinary action under the company's disciplinary procedures.

Returning to work:

The Company will set the duration of the closure or part closure, upon expiry of the period employee will be required to resume their duties automatically.

Part 26 - Grey Fleet Policy

1. Business Travel

1.1 MJ Conroy Construction (the company) is responsible for meeting the cost of travel by its employees on official business on behalf of the company. Official travelling means necessary travel for the purpose of official business.

1.2 It is necessary for the company to give attention to economic efficiency in its spending on employee travel, and this means reviewing the cost of travel and promoting the most cost-effective method of transport to employees in the first instance.

1.3 The Company is committed to reducing the impact on the environment from its business travel.

1.4 As part of our overall health and safety policy, the company is also committed to managing the risks that our employees face and create when driving for work. We ask all our employees to play their part.

2. Necessity of Travel

2.1 Employees will only be reimbursed for expenses, which they actually and necessarily incur in the course of official travel.

2.2 Before contemplating any journey the following assessments need to be undertaken regarding the necessity of the journey:

- Can the need for the journey, or task be carried out equally well using Video Conferencing facilities, telephone, e-mail, or through correspondence?
- Can the meeting or need for the journey be postponed until a later date, or brought forward and then be combined with an additional requirement to travel, to reduce overall travel costs?
- Is a colleague already travelling to the same meeting or location by car, with spare capacity?

3. Using a Private Vehicle

3.1 Payments may be made to allow employees to use their own vehicles for journeys under kilometres, provided

there is a benefit to the Department and the mileage rate represents the most cost-effective means of transport for the journey.

3.2 Employees driving for work in their own vehicle must ensure that the vehicle complies with the law, is in safe and roadworthy condition and is suitable for its purpose. It is also the employee's responsibility to ensure that the vehicle is appropriately insured to be used whilst driving for work and that they hold a valid driver's licence for the class of vehicle they are driving.

3.3 When claiming motor mileage in a private vehicle, the employee signs the declaration on the claim form to recognise their obligations as follows:

- to ensure that the vehicle meets the minimum safety standards
- to ensure the vehicle is taxed and, where appropriate, has a valid NCT/ DOE certificate
- to ensure their motor insurance policy includes business use cover
- to ensure they possess a valid licence to drive the vehicle being used
- to ensure the vehicle is serviced according to the manufacturer's specifications
- to ensure the vehicle is not used inappropriately, (e.g. unsecured load carrying, or hazardous off-road access).

4. Managing Occupational Road Risk

4.1 When opting to drive on business it is important to remember and apply the following health and safety best practices:

- observe the rules of the road.
- at all times you must obey speed limits, and never drive faster than road or driving conditions safely allow.
- make sure that you are fit to drive.
- If you need to wear glasses or contact lenses whilst driving that you wear them as and when prescribed.

Part 27 - CCTV Policy

Introduction

The purpose of this policy is to regulate the use of any Closed-Circuit Television (CCTV) system when monitoring both internal and external environs of any place of work of MJ Conroy Construction.

Definitions

Data Controller – means EHS Director, MJ Conroy Construction, Industrial Estate, Kilmaine Road, Ballinrobe, Co. Mayo

Objectives of the CCTV System

- Protect property and assets at any place of work
- Promote the health and safety of personnel and visitors
- Support An Gardaí Síochána in a bid to deter and detect crime; and
- Assist identifying, apprehending, and prosecuting offenders.

General Principles of Operation

The information obtained by CCTV is controlled in accordance with the Data Protection Acts 1988 and 2003. Signage will be placed at the location of where CCTV cameras are situated to inform that CCTV is in operation.

The CCTV system will be operated fairly, within the law, and only for the purposes for which it was established.

Operation of the Systems

The recording systems can only be accessed by authorised personnel from MJ Conroy and by the registered installer of any such system working on behalf of MJ Conroy.

Data Protection, Storage and Retention

The data captured from such systems is securely stored as electronic data. Typically, the data on the CCTV system is recorded on a loop and will be retained for an estimated 7 days. It will be overwritten after this period. Access to the system is password protected and the recorder secured in a safe room.

Access Requests

Access to the CCTV system will be restricted to authorised personnel only. In relevant circumstances, CCTV footage may be accessed by;

- A. An Garda Siochana where they require CCTV footage for a specific investigation. All requests must be submitted in writing to the Data Controller as per the requirements of section 8 of the Data Protection Act.
For practical purposes, and to expedite a request speedily in urgent situations, a verbal request may be sufficient to allow for the release of the footage sought. However, such verbal requests must be followed up with a formal written request.
There is a distinction between a request by An Garda Siochana to view CCTV footage and to download copies of CCTV footage. In general, An Garda Siochana making a request to simply view footage on the premises would not raise any specific concerns from a data protection perspective.
- B. Any person whose image has been recorded has the right to be given a copy of the information recorded providing that such image/ recording exists (i.e. provided it has not been deleted) and provided that an exemption/ prohibition does not apply to the release. To exercise that right, a person must provide photographic ID, make an application in writing providing certain information to the Data Controller such as date, time, location and duration of the recording. The cost of making an application is €6.35 and will be borne by the applicant. Requests must be responded to by the Data Controller within 40 days.

Access Requests can be made to;
The Data Controller
C/O MJ Conroy,
Industrial Estate,
Kilmaine Road,
Ballinrobe
Co. Mayo.

More information on access requests can be found on the Data Protection Commissioners website.

Review

This policy will be reviewed and updated regularly to take into account changing data protection legislation or guidelines from the Data Protection Commissioner, An Garda Siochana, and relevant bodies.

Part 28 – Corporate Social Responsibility

MJ Conroy places a strong emphasis on the responsibilities we have to our clients, the community and the part played in building a sustainable future for all of us. We continue to build our reputation for excellence, quality and reliability while enhancing our corporate social responsibility.

Our goal is to run a responsible business, leading by example, going beyond what is required of us in law, while exceeding and protecting our stakeholders needs.

By clearly communicating how we do things, define our core principles and values we can attract and retain customers and employees. What sets us apart is our drive to learn new techniques that deliver superior solutions that protects and supports our future environment.

Our Values:

1. **Workplace** – act in a responsible and respectful manner towards our people, promote a positive and safe workplace. Encourage continuous training and development that support career progress. Embrace diversity and engage with a range of customers, suppliers and employees.
2. **Environment** – develop a comprehensive environmental policy to promote sustainable and responsible business. Commit to minimising the impact of our operations to ensure a more sustainable future.
3. **Marketplace** – work closely with our clients on the planning and execution of projects that exceeds their expectations. Partner with ethical suppliers to provide a unified, excellent service and build long term relationships.
4. **Community** – commit to having a positive impact on society and open to engage with clients, suppliers and employees that support social causes. Recognise the importance of employee volunteering that help local community groups and charities.
5. **Quality** – our people strive at all times to provide a quality of service which exceeds client expectations. Part of what makes us different is our dedication and innovative approach to continually enhance our quality standards to the client.

Part 29 – Temporary Works Design

It is the policy of MJ Conroy Construction to identify in a timely manner where necessary, the requirement for any temporary works design as maybe required on any contract. Ideally this requirement will be identified before the contract commencement stage so that a suitably qualified designer and/or subcontractor to carry out the work can be appointed in a timely manner to the requirements of all applicable regulations.

The appointment of the designer must take into account the requirement of all necessary design, construction, inspection and removal of the temporary works. In taking these requirements into consideration, the appointment may require the appointment of more than one specialist to carry out this work, be that the appointment of designers to design the work and suitably qualified specialist subcontractors to execute the work. All designers and subcontractors must have all applicable health and safety training and appropriate insurance cover in place. Details of which will be required by MJ Conroy Construction prior to appointment.

Part 30 - Forms and Permits

30.1 MJ Conroy Construction Forms & Permits

MJ Conroy Construction use internal company forms and permits as part of the company EHS management system.

These forms are made available in hard copy and if possible, soft copy on each site⁴. The forms must be filed in the relevant section of the on-site safety file.

30.2 Health & Safety Authority Forms

MJ Conroy Construction also use Health and Safety Authority forms as part of the company health and safety management system. These forms are made available in hard copy and if possible, soft copy on each site, e.g., AF1 and AF2 forms. The forms are to be retained as part of the on-site safety file when completed.

Part 31 – Hazard Identification, Risk Assessment & Control Measures (Library of Risk Assessments)

The Library of Risk Assessments (SP 25) compiles all company level EHS risk assessments.

The risk assessments in this library that are applicable to any project should be identified in PSCS Environmental, Health & Safety Plan prepared for individual projects with high-risk hazards (colour coded Red) and lower risk hazards (colour coded Amber).

High risk hazards require greater degree of pre-assessment and controls to be put in place.

⁴ Soft copies of all forms & permits are provided for site use via the HammerTech online OH&SMS platform as part of the on-site safety file.

On any projects where MJ Conroy is working under another contractor/ entity who is the appointed Project Supervisor Construction Stage (PSCS), MJ Conroy will be directed by the project rules, requirements and any stipulations as imposed by the appointed PSCS in respect to Health and Safety on the project. This will include all safety control and risk mitigation requirements as may be required by the PSCS.

Notwithstanding this, where MJ Conroy considers that their controls to be of a higher/ safer standard (and through consultation with the PSCS), MJ Conroy will always endeavour that works are carried out, at a minimum, in accordance with its statutory requirements and its own company procedures, policies and control measures as identified in its library of risk assessments document (SP-25).

Risk Assessment	Risk Assessment
RA 01. Working at Heights	RA 37. Manhole Construction: Blockwork
RA 02. Scaffolding	RA 38. Pipe Laying
RA 03. Use of Excavators	RA 39. Work on Live Foul Waste Connections
RA 04. Working in Excavations	RA 40. Brickwork / Blockwork / Stonework
RA 05. Use of Ladders and Stepladders	RA 41. Lone Working
RA 06. Roof Work	RA 42. Use of Portable Electrical Equipment
RA 07. Work on Fragile Roofs	RA 43. Driving for Work
RA 08. Use of Telescopic Handler	RA 44. Hand Arm Vibration
RA 09. Excavators used for lifting	RA 45 Dust
RA 10. Lifting Operations	RA 46. Breaking into an Existing Manhole
RA 11. Overhead Powerlines	RA 47. Erecting/ removing D-Wall panels / Barrier Walls
RA 12. Use of Table Saws	RA 48. Erecting/ removing bubble screens in Cleanroom Areas
RA 13. Vehicle movement on site	RA 49. Working in Clean Areas
RA 14. Working Close to Underground Services	RA 50. Use of Hand Tools
RA 15. Installation of Underground Services	RA 51. De-crating and moving machines
RA 16. Use of Site Dumpers	RA 52. Chasing
RA 17. Working in Ceiling Voids	RA 53. Material Storage
RA 18. Use of Mobile Scaffold Towers	RA 54. Laying Kerbs
RA 19. Use of Mobile Elevated Working Platforms (Scissor Lifts & Cherry Pickers)	RA 55. Use of Laser Levelling Equipment
RA 20. Vehicle Load Security	RA 56. Use of Rubbish Skips
RA 21. Use of Disc Cutters & Abrasive Wheels	RA 57. Disposal of Waste Materials
RA 22. Work in Confined Spaces	RA 58. Work with Non Asbestos Insulating Material (Rockwool / fibreglass etc.)
RA 23. Fire on Site	RA 59. Site Office, Welfare & Storage
RA 24. Asbestos	RA 60. Office Work
RA 25. Work in Hazardous/ ATEX areas	RA 61. Visual Display Units/ DSE (display screen equipment)
RA 26. Erection/Striking of Falsework	RA 62. Ergonomics
RA 27. Minor Demolitions	RA 63. New Workers
RA 28. Manual Handling	RA 64. IT & Office Operations
RA 29. Work In and Around Occupied Premises	RA 65. Security
RA 30. Unloading, Loading, distribution & connection of Gas Cylinders	RA 66. Environmental Considerations
RA 31. Use of Trestles / Bandstands	RA 67. Community Relations
RA 32. Use of Compressors & Pneumatic Power Tools	RA 68. Corporate Level RA– Project Timescale
RA 33. Concreting Operations	RA 69. Corporate Level RA– Subcontractor

	Evaluation
RA 34. Steel Fixing	RA 70. Corporate Level RA – Contract Acceptance/ Rejection Parameters
RA 35. Flammable Liquids: Storage & Use	RA 71. Corporate Level RA– Contract Oversight & Review
RA 36. Manhole Construction: Precast Concrete Units	RA 72. COVID-19 site work
	RA 73. COVID-19 office work

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