



Imagination Europe Ltd Health & Safety Policy

**Supported by related implementation responsibilities
and programmes for monitoring and control**

Integrated Management System (IMS)
Policy Owner: Global Head of Health & Safety
Author: Debra Kilvington
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1.0 COMPANY POLICY FOR HEALTH AND SAFETY

1.1 THE IMAGINATION GROUP GENERAL COMPANY POLICY STATEMENT

HEALTH & SAFETY AT WORK ACT 1974 THE IMAGINATION GROUP POLICY STATEMENT

The Company's policy is as follows:

- i. To give the greatest importance to the safety and welfare of its employees.
- ii. To regard the requirements of Government legislation and the relevant government legislation within the countries it operates in respect of health and safety as the minimum standard acceptable and to provide health and safety facilities which exceed this standard whenever possible.
- iii. To identify workplace hazards and assess risks to safety and health of employees, clients, and all others who may be affected by the activities of this Company's undertaking, and to implement appropriate measures to effectively control hazards to remove or reduce them as far as reasonably practicable whenever possible.
- iv. To provide safe and healthy working conditions by means of careful supervision, skills, knowledge, qualification and training, as required.
- v. To instruct every new employee in the general occupational health and safety procedures and practices of the Company.
- vi. To ensure that high standards of fire safety and fire prevention are maintained.
- vii. To ensure employees and others who may work on or visit our premises are aware of the procedures in the event of fire or other emergency, including safe evacuation.
- viii. To standardise procedures for accuracy in reporting health and safety 'events' such as incidents and accidents.
- ix. To ensure the continued suitability and sufficiency of our arrangements for health and safety.

Imagination Group Board

| | |
|---|-----------------------|
| Chairman | Gary Withers |
| CEO | Patrick Reid |
| Group COO | Simon Bruxner-Randall |
| Group Finance Director | Mark Chappell |
| Legal Services Director & Company Secretary | Robert King |

Responsibilities of the Board

The overall responsibility for Health and Safety across the group lies with The Imagination Group Limited Board of Directors ("The Group Board"). The Group Board has directed the respective boards of the regional operating companies to adopt and implement Health and Safety policies and procedures taking into account local regulations and working practices. The Group Board is committed to maintaining a consistently high standard of Health and Safety practice across the Group, and has directed that the requirements set out in the health and safety policies and procedures of individual operating companies should be no less stringent than those set out in the Imagination Europe Policy.

Simon Bruxner-Randall, Group Operations Director, is the director responsible for bringing relevant health & safety issues to The Group Board's attention, for championing The Group Board's commitment to the highest standards of healthy and safety practices, and for ensuring the boards of regional operating companies adopt and enforce compliance with appropriate



health and safety policies.

Regional Operating Companies

| Regional Operating Company | Country | H&S Policy applicable for |
|--|-----------|--|
| Imagination Europe Limited | UK | All activity contracted by Imagination Europe Ltd, Imagination (Deutschland) GmbH, Imagination Middle East LLC, Imagination East Limited (Dubai Branch) and Imagination Design & Communications India Pvt Ltd. |
| Imagination Middle East Limited (Dubai Branch) | UAE | |
| Imagination Middle East LLC | Qatar | |
| Imagination Saudi Arabia | KSA | |
| Imagination The Americas Inc. | USA | All activity contracted by Imagination Americas Inc and Imagination Canada Limited. |
| Imagination Asia Limited | Hong Kong | All activity contracted by Imagination Asia Limited and Imagination Asia (Macau) Limited. |
| Imagination Shanghai Limited | China | All activity contracted by Imagination Shanghai Limited |
| Imagination Australia Pty Limited | Australia | All activity contracted by Imagination Australia Pty Limited. |

The default policy is the Imagination Europe Policy which shall apply in any circumstances where no other existing policy specifically applies.

This policy statement will be kept up-to-date, particularly as the business changes in nature and size. To ensure this, this policy statement and the way in which it is implemented will be reviewed every year or sooner if necessary to reflect new legislation or changes in organisation or implementation of policy.

This policy is the written statement required of The Imagination Group under Section 2(3) of the Health and Safety at Work Act (HSWA) 1974, and is intended to give clear guidance to all employees. This document has legal status and should be regarded as part of The Imagination Group's internal arrangements for health and safety. The information contained in this document is mandatory on all employees and any problems in the interpretation of this policy or its implementation should be reported to the nominated responsible manager.

Approved by: Debra Kilvington , Global Head of Health & Safety

Approved by: Simon Bruxner-Randall , Group Chief Operating Officer

Date: 14 September 2022



1.2 IMAGINATION EUROPE LIMITED POLICY STATEMENT

It is the policy of Imagination Europe Limited to comply with The Imagination Group Health & Safety Policy statement and any relevant health & safety at work legislation. To ensure so far as reasonably practicable the management and conducting of our work activities in such a manner as to ensure the health, safety and welfare at work of our employees and to prevent any improper conduct likely to place the safety, health or welfare at work of our employees and others at risk. Imagination Europe Limited will provide such information, training and supervision, needed for this purpose.

Persons not employed by Imagination Europe Limited who may be affected by our activities shall be protected as part of our duty of care, so far as is reasonably practicable.

All employees, freelancers, suppliers and temporary employees have a duty of care to cooperate with supervisors and line managers to achieve a health and safe workplace for themselves and others who may be affected by their work.

The company will consult with our employees on matters of safety, health & welfare and ensure that they are notified of and understand their specific duties under current legislation.

The allocation of duties for safety matters and particular arrangements to implement the Imagination Group Health & Safety Policy Statement and the Imagination Europe Limited policy statement are set out within this policy.

This policy statement and policy will be kept up to date, particularly as the business changes in nature and size. To ensure this happens, this policy and the way in which it has been operated will be reviewed every year or sooner if necessary to allow for changing circumstances and ensure operational effectiveness.

Approved by: Patrick Reid , Group Chief Executive Officer

Date: 14 September 2022



2.0 ORGANISATION FOR HEALTH AND SAFETY

This section describes the organisation of Imagination Europe Limited with regard to its health and safety responsibilities and the duties of individuals within the organisation.

All Imagination employees should be aware that they are likely to be ascribed responsibilities under more than one paragraph of this document.

All Imagination employees who carry out their work activities from the offices named in Section 2.1 will work to the health & safety arrangements outlined in this the Imagination Europe Limited Health & Safety policy.

IC is referenced throughout this policy which refers to the Investor Communications department within Imagination The Americas Inc.

2.1 Imagination Europe Limited

Imagination Europe Limited includes the following active companies:

| | |
|--|---|
| Imagination Europe Limited | 25 Store Street, London, WC1E 7BL, UK |
| Imagination (Deutschland) GmbH | |
| Imagination Middle East LLC | |
| Imagination Middle East Limited (Dubai Branch) | Boulevard Plaza 2 Level 6, Office Suite 601 PO Box 214802 Dubai UAE |
| Imagination Saudi Arabia LLC | 7235 Al Olaya - Al Olaya District Unit 251 Riyadh 12244-2392 Kingdom of Saudi Arabia |

2.2 Imagination Europe Limited Board of Directors

| | |
|-------------------|----------------|
| Chairman | Gary Withers |
| CEO | Patrick Reid |
| Finance Director | Mark Chappell |
| CDO | Julian Baker |
| Managing Director | Richard Hannah |
| Director | Ross Wheeler |

2.3 Responsibilities of the Board

The overall responsibility for occupational health and safety lies with the Imagination Europe Limited Board of Directors. The responsibility for implementation of health and safety arrangements within Imagination Europe Limited are normally delegated in accordance with the

later paragraphs of this document, but the Directors retain the duty to ensure that these arrangements are operating effectively and are changed when the need arises.

In respect of Imagination Europe Limited, Patrick Reid, CEO, is the person responsible for bringing relevant health and safety issues to the Board's attention, and for championing health and safety policy objectives of Imagination Europe Limited at board level.

2.4 Responsibilities of each Head of Department/General Manager

Departmental Heads (and their equivalent) are responsible for, implementing and reviewing their departments own health and safety arrangements (which are those for the whole company) to ensure the health and safety of Imagination employees while at work in their own departments, both on Imagination's premises and elsewhere. Local health and safety laws will be adhered to in each region and in the absence of any detail, the Imagination Europe policies and procedures will apply.

In addition to the duties incumbent on all employees, a person responsible for the supervision or management of one or more employees is to:

- i. Supervise/manage the works of the employees under his/her control so as to ensure, as far as is reasonably practicable, that safe working practices and procedures are employed. The closeness of supervision required will vary with the experience and expertise of the person being supervised.
- ii. Ensure that all members of employees under his/her control have a thorough understanding of the health and safety requirements relevant to their work.
- iii. Inspect all areas within his/her control at regular intervals, assess and, where necessary, reassess potentially hazardous situations, identify the risks and implement appropriate corrective measures.
- iv. Assist the Global Head of Health & safety to monitor the issue of any personal safety equipment and assess as suitable the condition of any generally held health and safety equipment under his/her control. If any failure, deficiency or fault exists in this equipment, he/she is to take immediate steps to ensure that the safety of any individual concerned is not compromised, and that the appropriate remedial action is taken at the earliest opportunity.
- v. Ensure all accidents or incidents which have led, or may lead to, work related injury, illness or damage to health and safety apparatus are reported to the Global Head of Health & Safety and the manager of the office/venue where the accident/incident has taken place.
- vi. Have regard to the safety training of employees under his/her control and ensure that such training is current and up to date and that any identified and mandatory training with regard to health and safety are received and upheld.
- vii. Ensure that Health and Safety documents (hard copy or online) are routine line items for comment and consideration at department meetings.
- viii. Ensure that occupational health and safety matters are included in the 'lessons learned' exercise for every project so that trends may be identified and actions established to rectify issues therein.
- ix. Alert the Health and Safety Manager with regard to any matters arising from (i) to (viii) above where the reporter cannot immediately resolve the matter within their sphere of responsibility.
- x. Support project teams to uphold the duty of care imposed on each individual employee and Imagination (in their capacity as Employer) to assure, so far as is reasonably practicable, the health and safety of all people in the work area.

2.4.1 Responsibilities of All Employees at Imagination

All employees are responsible for acting in a safe manner while at work. By understanding their responsibilities and following existing safety rules and regulatory requirements, our employees will help our company to comply with their legal duties and also to positively contribute to the safe running of our workplace.

All employees have the responsibility to:

- Take reasonable care of their own safety
- To take reasonable care of the safety of others affected by what we do or fail to do
- Not interfere with or misuse, either intentionally or recklessly, anything which has been provided in the interests of safety and health
- Actively seek to prevent accidents, incidents and other health and safety related events in the workplace
- To cooperate so that we, as individuals and our company can fulfil our legal duties (i.e to comply with current legislation for a safe and healthy workplace, wherever that may be)
- To report any incident (accident, dangerous occurrence, near miss) and any other event in accordance with RIDDOR Regulations (2013) or those legal requirements in the global region where the accident/ incident at work has taken place.
- To report any hazards, defects or damage to plant machinery, equipment and tools or any shortcomings in the existing safety arrangements, to a responsible person without delay
- To abide by the requirements of a safe system or work, and to evaluate hazard and risk in the safe system of work as any changes may occur, so as to ensure that risk is suitably controlled
- To lead by and set a good personal example in relation to health and safety at work
- To undertake any health and safety training courses as requested by Imagination in pursuit of skill, knowledge, competence, experience and qualification, for compliance and competence in the workplace.

2.4.2 Responsibilities of the Project Director

As a primary point of contact with clients during project conception and development studies, the Project Director's health and safety responsibilities will include:

- i. Where applicable take reasonable steps to alert clients to their duties as imposed by the Construction (Design and Management) Regulations 2015 [CDM], and of the existence of any guidance which gives practical advice and support on how clients can comply with their statutory duties.
- ii. Ensuring that budget proposals include and adequately reflect any cost implications for the provision of health and safety management resources necessary for any given project. This will include, critically, an evaluation of a project's time scales in relation to the necessary resources required to manage the undertaking safely.
- iii. To ensure that Health and Safety is established a routine line item for comment and consideration on every project agenda.
- iv. Alert the Health and Safety Manager with regard to any matters arising from (i) to (iii) above where he/she cannot immediately resolve the matter within their sphere of responsibility.

2.4.3 Responsibilities of Design Teams

Heads of Department within the Creative Group will be responsible to ensure that, in respect of any design prepared and used for the purposes of construction work, every designer shall include among the design considerations adequate regard for the need to:

- i. Initiate a suitable risk assessment strategy where applicable.
- ii. Consider the impact of the design on the existing environment e.g. fire safety, way-finding, etc.
- iii. Eliminate foreseeable risks and hazards to health and safety, wherever reasonably practicable, through alternative design considerations.
- iv. Combat the causes of risks at source.
- v. Any hazard where the risk cannot be eliminated then it must be reduced to an acceptable level so far as reasonably practical during the design process.
- vi. Ensure that the design includes adequate information about any aspect of the project or structure or materials (including articles and substances) which might affect the health and safety of any person carrying out construction work or maintenance work or cleaning work in or on the structure at anytime.
- vii. Alert the Health and Safety Manager with regard to any matters arising from (i) to (v) above where he/she cannot immediately resolve the matter within their sphere of responsibility.

2.4.4 Responsibilities of the Production Management Department

The relevant Production Director will be responsible for ensuring the establishment and continuance of good health and safety practices and arrangements where operations are conducted outside of the office, e.g. temporary events, exhibitions, conferences and special projects, and will appoint 'competent persons', e.g. Production Managers, to implement such practices and arrangements.

Each Manager shall be responsible for identifying all statutory health and safety requirements of direct relevance to his/her operations, and for ensuring that all work activities under his/her control are conducted in accordance with these requirements and without risk to the workforce or others affected by the work.

To successfully discharge these key responsibilities, appointed 'competent persons' will be required to:

- i. Exercise control over all work activities within their jurisdiction.
- ii. Ensure that adequate measures are taken with regard to the health and safety of all site personnel (Company, contractor and visiting).
- iii. Have well-placed confidence in the competence of any person or persons delegated to fulfil the Production Manager's role in his/her absence.
- iv. Plan, develop and maintain adequate procedures for the safe control of construction work and related activities (e.g. offloading/loading and storage) and monitor their effectiveness in preventing injury, damage and loss.
- v. Provide information, instruction and support to Contractors to enable the successful execution of their own health and safety responsibilities.
- vi. Monitor the day-to-day implementation of work programmes control procedures, formal instructions (i.e. as described in the health and safety plan, method statements, safe systems of work, etc.) and work schedules, to ensure that all health and safety related aspects are being fully observed, and that hazardous and/or potentially hazardous

- circumstances or conditions are (a) avoided, or (b) adequately controlled. (In regards to IC the level of monitoring needs to be assessed on a project by project basis by the production manager responsible).
- vii. Develop and maintain detailed and effective procedures for the control of possible emergencies, e.g. first aid, fire evacuation, etc. and ensure their effectiveness, as appropriate, through the regular use of emergency scenarios and drills.
 - viii. Investigate any accidents or incidents and initiate, at the earliest opportunity, appropriate steps to prevent their reoccurrence.
 - ix. Ensure that any accidents/injuries or dangerous occurrences are recorded in the register provided for purpose, copying record details to the Health and Safety Manager.
 - x. Initiate regular arrangements (e.g. dedicated pre-construction and on-site safety meetings) for consulting employees, contractors and other representatives of the workforce on health and safety matters.
 - xi. Ensure the continuing integrity of structures, fixtures and equipment, including safety and emergency facilities, through regular inspection programmes.
 - xii. Alert the Health and Safety Manager with regard to any matters arising from (i) to (x) above where he/she cannot immediately resolve the matter within their sphere of responsibility

2.4.5 Production Technology

The responsibilities of the Production Technology Managers will be to ensure that good health & safety practices and arrangements are made for any production technology work and related activities:

- i. Exercise control over all work activities within their jurisdiction
- ii. Plan, develop and maintain adequate procedures for the safe control of production technology work and related activities (e.g. design & installation of technical exhibits) and monitor their effectiveness in preventing injury, damage and loss.
- iii. Ensure the continuing integrity of technical exhibits, fixtures and equipment, including safety and emergency features, through effective design, risk assessment and regular inspection programmes.
- iv. Alert the Health & Safety Manager with regard to any matters arising from (i) to (iii) where he/she cannot resolve the matter within their sphere of responsibility.

2.4.6 Technology Studio

The responsibilities of the Digital Director will be to ensure that good health & safety practices and arrangements are made for any digital work and related activities including work activities taking place outside the office:

- i. Exercise control over all work activities within their jurisdiction.
- ii. Plan, develop and maintain adequate procedures for the safe control of digital work and related activities (e.g. film shoots) and monitor their effectiveness in preventing injury, damage and loss.
- iii. Provide information, instruction and support to contractors/suppliers/freelancers to enable the successful execution of their own health and safety responsibilities.
- iv. Develop and maintain detailed and effective procedures for the control of possible emergencies, e.g. first aid, fire evacuation, etc. and ensure their effectiveness, as appropriate,

- v. Ensure the continuing integrity of digital fixtures and equipment, including safety and emergency features, through effective design, risk assessment and regular inspection programmes.
- vi. Alert the Health & Safety Manager with regard to any matters arising from (i) to (iii) where he/she cannot resolve the matter within their sphere of responsibility.

2.4.7 Logistics & Travel Managers

Managers responsible for Logistics & Travel managers will be responsible for ensuring that suitable and sufficient arrangements for health and safety are provided by all service providers within the logistics matrix i.e. airlines and air transport providers, road transport, waterborne transport and venues e.g. floating hotels, restaurants, hotels, venues, catering companies, special events organisers, etc.

To meet such responsibilities, Logistics & Travel Managers will need to be ‘reasonably satisfied’ that in each instance:

- i. Control over all work activities within their jurisdiction is maintained.
- ii. Information, instruction and support is provided to suppliers/contractors/freelance employees to promote the successful execution of their own health and safety responsibilities.
- iii. Effective procedures for the control of possible emergencies, e.g. first aid and primary medical care in the event of an accident or illness, and fire evacuation procedures in buildings and enclosures, etc. are always in place.
- iv. Record documents exist that establish that such principles are implicit to the terms and conditions of any agreement or arrangement for services provided.
- v. Accidents/injuries or dangerous occurrences are recorded in the relevant register provided for purpose, e.g. the office accident book or the on-site accident report form, copying record details to the Health and Safety Manager.
- vi. Well-placed confidence is realised in the competence of any person or persons delegated to fulfil the Logistics/Travel Manager’s role in his/her absence.
- vii. Alert the Health and Safety Manager with regard to any matters arising from (i) to (vii) above where he/she cannot immediately resolve the matter within their sphere of responsibility

2.4.8 Facilities Management

The Facilities Manager has the responsibility to:

- i. Ensure that all members of employees under his/her control have a thorough understanding of the safety requirements relevant to their work.
- ii. Facilitate provision for the suitability and maintenance of all building systems designed to secure the safety and health of all persons working within, or visiting, the building.
- iii. Ensure the continuing integrity of structures, fixtures and equipment, including safety and emergency facilities, through regular inspection programmes.
- iv. Record any accidents/injuries or dangerous occurrences in the register provided for the building under management, copying record details to the Health and Safety Manager.
- v. Develop and maintain detailed and effective procedures for the control of possible emergencies, e.g. first aid, fire evacuation, etc. and ensure their effectiveness, as appropriate, through the regular use of emergency scenarios and drills.

- vi. Alert the Health and Safety Manager with regard to any matters arising from (i) to (v) where he/she cannot immediately resolve the matter within their sphere of responsibility.

2.4.9 Catering

The General Manager, Catering, is responsible for implementing the Company health and safety policies and procedures at Imagination and for ensuring that the requirements of all health and safety legislation affecting the Catering Department are established.

In particular, the General Manager, Catering, is responsible for ensuring that:

- i. All catering employees are safeguarded fully in respect of health, safety and welfare whilst at work, and that information regarding residual risks are communicated to those liable to be affected and that those risks are adequately controlled.
- ii. Members of the public e.g. maintenance contractors, Imagination employees, visitors, etc. who enter areas under the control of the Catering Department are not exposed to any risks to health and safety during the course of their business.
- iii. Ensure all accidents/incidents are recorded in the register provided for purpose, copying record details to the health & safety manager.
- iv. No work is carried out by the Catering Company or its contractors that is liable to expose employees, clients or members of the public to hazards to health, unless suitable and sufficient assessments of the risk are made and necessary measures to prevent or control the risk have been introduced. This includes hazards associated with the transportation and storage of articles and substances.
- v. Alert the Health and Safety Manager with regard to any matters arising from (i) to (v) where he/she cannot immediately resolve the matter within their sphere of responsibility.

2.4.10 Warehouse

The Warehouse Manager shall be responsible for implementing all statutory health and safety requirements of direct relevance to his/her operations, and for ensuring that all work activities under his/her control are conducted in accordance with these requirements and without risk to the workforce or others affected by the work:

- i. Ensure that all members of employees under his/her control have a thorough understanding of the safety requirements relevant to their work.
- ii. Inspect all areas within his/her control at regular intervals, assess and, where necessary, reassess potentially hazardous situations and instigate appropriate corrective measures.
- iii. Supervise/manage the works of the employees under his/her control so as to ensure, as far as is reasonably practicable, that safe working practices and procedures are employed. The closeness of supervision required will vary with the experience and expertise of the person being supervised.
- iv. Ensure all accidents or incidents that have led, or may lead to, work related injury, illness or damage are recorded and records forwarded to the Health & Safety Manager.
- v. Have regard to the safety training of employees under his/her control and ensure that any deficiencies in training with regard to health and safety and statutory requirements are corrected.
- vi. Alert the Health and Safety Manager with regard to any matters arising from (i) to (v) above where he/she cannot immediately resolve the matter within their sphere of responsibility.

2.5 Responsibilities of the Global Health and Safety Manager

The Global Health and Safety Manager acts on behalf of The Imagination Group in ensuring that overall safety arrangements across the Imagination Group and its individual companies are operating effectively.

In particular, the Global Health and Safety Manager is responsible for:

- i. Ensuring that the appropriate action is taken on any matters brought to his/her attention regarding paragraphs (i) to (viii) of the Imaginations Group Health and Safety Policy Statement.
- ii. Ensuring that appropriate action is taken on any matters brought to his/her attention regarding Imagination Europe Limited Health & Safety Policy Statement.
- iii. Seeking the advice of external health and safety agencies when necessary.
- iv. Monitoring the operation of all Safety Instructions and recommending any necessary modifications.
- v. Bringing to the notice of management and employees hazards that may have implications for other areas of Imagination Europe Limited activities.
- vi. Ensuring that all post-holders are informed clearly in writing of arrangements for health and safety within Imagination Europe Limited.
- vii. Ensuring that liaison between departments, and where required persons other than employees, on matters of safety are satisfactory.
- viii. Answering queries on matters concerning safety, statutory legislation and accident prevention.
- ix. Informing the board of any new or amended statutory legislation that may impinge on the company's activities.
- x. Delivering a monthly health & safety report to the Group Services board.
- xi. Explaining safety policy and procedures.
- xii. Making recommendations to senior management when requested on safety aspects of new equipment.
- xiii. Maintaining an accident and incident record system, investigating accidents or incidents as necessary and making any necessary reports to statutory bodies.
- xiv. Making periodic inspections of workplaces.
- xv. Reviewing this policy periodically and preparing drafts of any necessary changes.
- xvi. Maintaining and promoting satisfactory arrangements for liaison with employees on health and safety matters.

2.6 Operational Duty of Care for All Employees

Each employee has a duty to:

- i. Work safely, conduct himself/herself in a safe manner, take reasonable care for the health and safety of himself/herself and others, and avoid taking unsafe shortcuts or fail to follow established procedures which might compromise health, safety or the work environment.
- ii. Comply with all statutory obligations imposed under current health and safety legislation and any other legislation relating to the country that they are working within.
- iii. Carry out work activities in accordance with Imagination Europe Limited safety procedures, instruction and standards.
- iv. Cooperate fully with supervisory and management personnel in ensuring that Imagination's health and safety responsibilities are fulfilled.

- v. Become familiar with any information issued by Imagination Europe Limited on the safe use of equipment, plant and materials.
- vi. Alert his/her supervisor to any potential hazards, which he/she is able to identify in the course of his/her work.

Employees must not:

- i. Participate in any act which they know may endanger themselves or their colleagues.
- ii. Jeopardise the integrity of equipment or installations provided for safety, including the misuse of equipment provided for use in emergencies.
- iii. Undertake any task or operation for which they have not received adequate training or for which they lack suitable tools, equipment or protective clothing.
- iv. Operate plant machinery or equipment which they know to be in an unsafe condition.

2.7 Responsibilities in Relation to the General Public, Temporary Employees, Visitors, etc.

The safety of the public is to be considered by all employees in the execution of their duties. No task is to be undertaken which would endanger the public and any hazard inadvertently arising must be rectified as a matter of the highest priority.

Precautions should be taken to ensure that temporary employees and visitors are not placed at risk by their lack of knowledge of Imagination Europe Limited working practices and procedures. This is the responsibility of the immediate supervisor/manager (in the case of temporary employees) and of the member of employees acting as host in the case of visitors.

2.8 Responsibilities of Suppliers/Contractors and Freelance Managers

All Suppliers/Contractors and Freelance Managers, have the responsibility to cooperate fully with Imagination Europe Limited supervisors and managers to comply with statutory provisions, The Imagination Group Policy Statement, Imagination Europe Limited policy and internal health & safety arrangements to achieve a healthy and safe workplace for themselves and others affected by their works.

Each Supplier/Contractor and/or Freelance Manager engaged to work on behalf of Imagination Europe Limited must have the competence and sufficient resources to safely plan and manage the agreed work at all stages of the project.

The basic responsibilities of the Supplier/Contractor/Freelance Manager are independent of contractual and administrative arrangements but his/her formal actions have to take them into account. The Supplier/Contractor/Freelance Manager should consult their relevant Imagination Europe Limited point of contact if, in their judgement, any part of their duties require review in the light of the contractual or management arrangements on his site.

Our regular contractors & subcontractors will be requested to sign up to a Master Agreement for the provision of services. This agreement will outline in further detail the health & safety responsibilities that Imagination Europe Limited require of our contractors & subcontractors.

In addition to the safety obligations binding to all site personnel, a person responsible for the supervision or management of one or more employees is to:

- i. Implement procedures that result in the production of relevant and project specific risk assessments and method statements to a suitable standard, and in sufficient time to

- allow all interested parties to review/comment on them, and for such comments to be adopted where appropriate, prior to commencement of the works.
- ii. Issue and explain appropriate risk assessments and, where necessary, method statements, to all affected workers prior to them carrying out their work tasks.
 - iii. Supervise/manage the works of the persons under his/her control to ensure that safe practices and procedures are adhered to. The closeness of supervision required will vary with the experience and expertise of the persons being supervised.
 - iv. Ensure that all workers under his/her control have a thorough understanding of the safety requirements relevant to their work.
 - v. Ensure that all operatives have the necessary skills to enable them to adequately perform the given task, or skill, e.g. forklift handling, control of lifting operations, etc.
 - vi. Maintain safety awareness among their employees, and others affected by the work.
 - vii. Inspect all areas within his/her control on a regular basis, assess and, as necessary, reassess the workplace/working environment for any health or safety implications, putting into effect suitable and appropriate corrective measures wherever necessary.
 - viii. Have regard to the safety training of operatives under his/her control and ensure that any deficiencies in training with regard to health and safety are made good.
 - ix. Ensure that Subcontractors are fully aware of all risks to health and safety which may affect them or their employees, and ensure that any hazardous work task carried out which may affect others will be fully communicated to those affected.
 - x. Monitor the issue of any mechanical or electrical equipment and the condition of any generally held safety equipment under his/her control. If any deficiency or fault exists in this equipment, he/she is to take immediate steps to ensure that the safety of any individual concerned is not compromised.
 - xi. Maintain an accident and incident record system for the Imagination project you are working on, investigating accidents or incidents as necessary and making any necessary reports to statutory bodies. Ensuring all records are forwarded to your Imagination point of contact.
 - xii. Report to the nominated Imagination Manager any matters arising from (i) to (xi) above where he/she cannot immediately resolve the matter within their scope of responsibility.

3.0 ARRANGEMENTS FOR HEALTH AND SAFETY

In order to fully implement its Health and Safety Policy and further define requirements for safe working practices, Imagination Europe Limited has developed arrangements for the control of work activities, to ensure the health and safety of anyone affected by the Company's undertakings. Each element of these arrangements has the common objective of promoting safe working practices and safety awareness, thus preventing accidents and mitigating accidental occurrences.

Departmental Managers are charged individually with the implementation of the arrangements that are applicable within the remit of their designation. These arrangements comprise the elements defined below.

3.1 Accident/Incident Reporting

All instances of personnel injury and damage to property or equipment, 'dangerous occurrence' and 'near miss' incidents, are to be reported. Responsibility for initiating incident investigations, compiling incident reports, reviewing incident details and implementing follow-up action rests with the accountable department. The departments will be assisted by the Imagination Global Health & Safety Manager.

3.2 Management Accountability

Imagination Europe Limited considers that the most effective and satisfactory way of implementing The Imagination Group's Policy statement and its individual policy is through the established management structure. Each department is accountable for the health and safety of all employees, including temporary employees, working under its direct supervision.

3.3 Safety Meetings

Imagination Europe Limited recognises the importance of liaison with employees over matters relating to health and safety at work. Arrangements for health and safety will be maintained by means of regular and frequent formal employees/team meetings, where advice from and views of all employees will be anticipated. Their aims shall be the promotion of safe working practices and the development of a high level of health and safety awareness.

The following are indicative of the range of meetings envisaged. It should be noted, however, that the form of meeting may be varied to suit the size, nature and location of the project.

(a) Occupational & Compliance Safety Coordination Meetings

Each quarter a departmental meeting will be held with the relevant head of department, department design & creative lead, senior account manager, senior production managers and health & safety manager to attend a Coordination Meeting and present an analysis of the overall safety performance of projects and procedures under their control. Other departmental personnel may also be invited to participate at these meetings.

Those attending should identify and present selected topics of significant or general interest for discussion, e.g. important issues raised at Departmental, Design, Production and Client Meetings, or incidents which have a particular learning content for other Imagination Departments. Reports on these meetings are to be circulated to the relevant personnel and copied to the health and safety manager.

(b) Production/Site Safety Meetings

Regular safety meetings are to be held by the Production/Site Manager and attended by supervisory employees, Contractor representatives, and where available, the Health and Safety Manager. Reports on these meetings are to be circulated to the relevant personnel and copied to the Health and Safety Manager. In relation to Investor Communication projects the necessity for these meetings will be determined by the Production/Site Manager depending on the scale of the project.

(c) Specific Job Oriented Briefings

The duration of these may be as little as five minutes. They should be held prior to the commencement of, and if necessary, during any new or non-routine operation. Meetings will involve both the Production Manager and Contractor personnel as appropriate.

The aims of such meetings shall be to ensure that:

- The method of carrying out the work is fully understood
- Appropriate procedures are followed
- The correct tools and equipment are used
- Adequate control and supervision are available

If the task activity is to be carried out under a Permit to Work, it is important to

determine that the entire scope of the work has been fully understood and that all safety measures have been fully defined.

These meetings do not normally require a follow-up or a written report.

3.4 Safety Reviews of Facilities, Equipment and Work Practices

Safety reviews of facilities, equipment and work practices are to be carried out at frequent intervals as:

- (a) a monitoring function of the Health and Safety Manager, and
- (b) a self regulating/appraisal function of senior management and line management

The Health and Safety Manager, as well as providing a monitoring function, will afford support which may be briefly described as follows.

Specialist advice and assistance is provided to departments and management on health and safety related matters. The services available include advice on the hazard prevention aspects of design, construction and maintenance, and information on legislation, Codes of Practice, safety and emergency procedures, and industrial safety standards. The assistance provided may take a number of forms, of which the following are examples:

(a) **Design Safety**

Guidance is provided on hazard prevention to designers, project teams, contractors and consultants involved in Imagination Europe Limited undertakings. Particular attention is directed at identifying and assessing possible hazards at the early stages of project and project modification design.

(b) **Construction Safety**

The Health and Safety Manager will provide advice and assistance to management and supervision on a range of matters, including job planning and implementation, equipment safety, evaluation of contractor safety standards, safety procedures, safety of the work environment, and emergency response monitoring.

3.5 Safety and Emergency Response Training

Imagination Europe Limited will provide adequate resources in all areas of safety and emergency response training, which are relevant to the requirements of its undertakings. It recognises job specific training as an important medium for increasing expertise and awareness in safety matters and will continue to promote this concept as part of its training philosophy.

3.6 Contractor Selection

Imagination Europe Limited requires total commitment by service providers and their employees to its Health and Safety Policy.

The relevant departments, in conjunction with the Health and Safety Manager, will assess Contractor Safety Policies, site specific method statements and risk assessments, safety performance on similar projects and attitudes to safe working prior to awarding contracts, especially where contractor activities take place on the Imagination Europe Limited premises or Imagination Europe Limited managed sites.



3.7 Summary

The Company reiterates its policy that effective prevention of injury and damage requires commitment from personnel at every level and it expects them to act responsibly in preventing both injury to themselves and others, and loss or damage to property and the environment.

APPENDIX I. HSE Guidance on Health and Safety Responsibilities of the Board

- i. The Board needs to accept formally and publicly its collective role in providing health and safety leadership in its organisation.
- ii. Each Board member needs to accept their individual role in providing health and safety leadership for their organisation.
- iii. The Board needs to ensure that all Board decisions reflect its health and safety intentions as articulated in the health and safety policy statement.
- iv. The Board needs to recognise its role in engaging the active participation of workers (full-time, temporary & freelance), contractors and suppliers in improving health and safety
- v. The Board needs to ensure that it is kept informed of and alert to relevant health and safety risk management issues. The Health and Safety Commission recommends that boards appoint one of their members to be the “Health and Safety Director”.

APPENDIX II. Safe working in an office (and in a hybrid work office)

Policy

Where Company employees work in an office, steps shall be taken to secure, as far as is reasonably practicable, their health, safety, and well-being.

Implementation

The responsibility for implementation of health and safety matters in a Company office lies with the relevant Head of Department, or Director as appropriate, in conjunction with all employees.

Guidance

This Note deals with general office work and not with the additional precautions necessary for the maintenance, repair etc of the office fabric, equipment or systems e.g. fire safety equipment.

Guidance is given in this Note on the following aspects:

- Introduction
- Working alone in an office
- Precautions in the office
- Emergencies in the Office
- Procedures in Case of Fire

Introduction

- i. Thousands of office workers suffer injuries each year. An office is not automatically a safe place in which to work. Positive action is necessary - hazards identified, preventive measures established and precautions taken. This also demands constant vigilance.
- ii. An office is the total premises including such areas as car parks, garages, footways, gardens and ancillary buildings. It also encompasses stores, garages and the like which are not adjacent to offices. An office may be owned, leased or rented; it may be occupied solely by Company employees or shared with other firms. The term office also includes the contents of buildings.
- iii. This Note describes the precautions to be taken and the procedures to be followed to minimise risks to the health and safety of those who work in our offices and others (e.g. visitors, public) who could be affected.
- iv. Hazard and risk assessments appropriate to the activities and as required by current legislation are to be compiled and used in all offices.
- v. There are office health and safety notice boards that display important instructions and information (e.g. fire precautions and escape, actions in emergency). These notices should be read and their contents remembered for the day when urgent action may be necessary.
- vi. Fire Monitors must be appointed to deal with precautions and particularly with escape from fire. In our smaller offices the relevant Head of Department or his/her equivalent will appraise the current fire safety precautions and ensure suitable arrangements are in place.
- vii. At our London offices there are employees trained to render first aid. Their names and locations are posted on the notice boards. All offices should be provided with at least one first aid box, usually in the care of an employee trained in first aid. At our London offices first aid boxes are located at the coffee points on each building floor.
- viii. There is at least one copy of this Safety Policy document permanently accessible in each office. This Safety Policy may contain other Safety Arrangement Notes pertinent to work in our offices globally, and reference should be made to them.

- ix. Accidents and adverse effects on health can be avoided if simple precautions are taken and if everyone is ready to follow planned procedures when urgent actions are necessary.

Working Alone in an Office

Working outside the usual office working hours is the commonest situation that can lead an employee to be working alone. In a small office an employee could find himself/herself alone during working hours. Several of the precautions for work outside working hours apply equally to this situation.

Everyone intending to work outside usual working hours should take the precautions described below. This is because they cannot be sure that they will have companions during the whole of the period. For example, he/she could be the last to leave the office unless specific arrangements had been made to avoid this.

Several measures are common to all work in an office; but they become more crucial when working alone.

The precautions are listed here:

- i. Inform your Head of Department (or their equivalent) beforehand. They will know of other work planned for the period (e.g. repair and maintenance work, cleaning operations) and of such matters that might affect you e.g. a temporary problem with telephones, fire alarm tests, etc.
- ii. Comply with the instructions of the Head of Department. In an extreme case, work outside usual office hours may not be possible.
- iii. Know the critical telephone numbers for use in an emergency.
- iv. Know the location of the nearest first aid box.
- v. Know the fire precautions for the building.
- vi. Know the security arrangements for the building and the procedures for the last person to leave the room, floor and building.
- vii. Never assume that you are the only person working in the building or that you are the last to leave - check before leaving.
- viii. Turn or switch off taps, coffee machines, equipment, lights etc.
- ix. Record your times of arrival and leaving in accordance with the system established

Precautions in the Office

Some of the precautions which follow may appear obvious or trivial. However, disregard of even the most obvious has resulted in serious injury.

General Do's and Don'ts

- Do not lift anything too heavy or awkwardly shaped - get help.
- Do not carry anything that prevents you seeing where you are going.
- Do not run, push open doors violently or jump up or down stairs.
- Do not tilt chairs backwards on two legs - such malpractice has caused serious injury.
- Do not use chairs etc. with obvious defects - put out of use - and report defects.
- Do not use a chair to reach a high shelf.
- Avoid furniture layouts that create hazards when drawers, doors are open.
- Avoid unnecessary accumulations of papers, files etc.
- Do not overload shelves.
- Do not stack things too high or in unstable arrangements.

- Put heavier things on lower shelves (or in lower drawers of cabinets).
- Use filing cabinets in the correct manner:
- Do not leave parts of furniture projecting (e.g. lower drawer of a filing cabinet) where they can obstruct movement.
- Do not have cables running across the floor where they can trip people.
- Do use circuit breakers with kitchen electrical appliances.
- Do not allow floor coverings (e.g. carpet tiles) to become loose or ruck up.
- Clean up spillages on floors thoroughly.
- Keep sharp objects - scalpel blades, modelling knives and the like - in covered containers.
- Do not dispose of unwanted sharp objects (e.g. scalpel blades, broken glass) by throwing them into a wastepaper bin - this can lead to injury to cleaners or others. Dispose of them in suitable containers, or wrap them in several layers of paper and put in stout envelopes clearly marked with a warning.

Office Machines and Equipment

- Do not use office machines and equipment without reading and following the instructions carefully and precisely.
- Do not investigate or interfere with any machine or equipment whether electrically operated or not, beyond the limit laid down in its instructions. If necessary, call for assistance from the Office Safety Coordinator.

Desktop Computers/Laptops

- Visual display units (VDU's) are a key feature of work equipment in our offices. With an increasingly heavy use of VDU's in the workplace, generally, questions have arisen about their effects on health.
- The Health & Safety (Display Screen Equipment) Regulations 1992 came into force on 1 January 1993 in the UK. A step by step guide to workstation assessment can be found in Appendix III of this policy document.

Electricity - General Precautions

- Do not open electrically operated machines or equipment without switching off (and disconnecting where possible) from the supply.
- Do not overload an electric circuit or an outlet such as a socket.
- Do not use makeshift electrical connections or "daisy chain" extension leads
- Switch off and disconnect any machine or equipment that overheats, smokes, sparks or gives a shock. Report promptly.

Fire Safety – General Precautions

- Do not let ignitable material accumulate. Store paper, files etc. away from heaters, electrical sockets and equipment.
- Make sure matches, cigarettes etc. are extinguished and put in fireproof ashtrays or containers.
- Observe the rules for any NO SMOKING areas.
- Take care in the handling of flammable/corrosive liquids. Deal with any spillages promptly.
- Do not forget to switch off fan heaters, and the like.
- Switch off (and disconnect where possible) electrically operated machines and equipment at the end of the day or shift.

- Operate the established procedure for the last person to leave a room, floor or building.
- Do not wedge open fire doors that should be kept closed.
- Know the safe routes of escape and help to keep them clear.

Visitors to Offices

The following guidance can form the basis of local arrangements which best suit your circumstances.

- Visitors Book:** So that we are aware of visitors to our premises and their location within the building, all visitors (including visiting Company employees) should sign the visitor's book at Reception. Departure from the offices should also be recorded in the book.
- Escorting:** To ensure that visitors are not exposed to situations or elements that could compromise their health and safety, visitors should be met in reception and thereafter escorted by a responsible member of employees throughout the period of their visit.
- Fire and Building Evacuation:** In the case of fire or other building evacuation, visitors should be escorted promptly from the building to the Assembly Point. The escort should report the visitor(s) name to the Fire Monitor.
- Security:** For reasons of security, visitors should be escorted by an employee at all times. employees should challenge unescorted strangers in their work place and, as necessary, escort the visitor to the right office/area. Such incidents should be reported to the employees being visited or to other senior members of employees.

Emergencies in the Office

The following guidance can form the basis of local arrangements which best suit your circumstances.

- **In Normal Working Hours**
 - **Fire:** employees should observe the procedures set out in this Policy for action to be taken in the event of fire.
 - **Bomb Alert:** employees should follow the procedures referred to in (i) above together with any specific instructions.
 - **Accidents to employees:** In the event of an accident which requires first aid, one of the Company's first aiders should be summoned to the scene. Names of first aiders are posted on notice boards. All accidents resulting in a personal injury, however slight, must be recorded in the accident book.
 - **Power Failure:** In the event of a power failure, employees should remain in their area of work but electrical equipment should be disconnected if appropriate.
- **Outside Normal Working Hours**
 - Should an emergency arise out of normal working hours, every effort should be made to follow the procedures outlined above. Senior members of employees may be contacted out of hours. A list of employees to be contacted in emergency is to be displayed in the vicinity of reception.
 - The health and safety of employees is of prime importance. No member of employees should hazard themselves in protection of the Company's premises or assets. Reception employees and others should not expose themselves to danger or injury from members of the public or other persons in any circumstances.
 - Depending on the circumstances, it may be sufficient to summon a senior employee to reception by phone to deal with the situation.
 - As the occasion demands, assistance from the emergency services should be summoned by dialling 999 (or its local equivalent in our other European offices).

Procedures in Case Of Fire

Where Company employees work in an office steps shall be taken with regard to fire precautions and procedures which ensure, so far as is reasonably practicable, the safety and health of those who work in or visit the office.

- i. All employees need to know what to do if a fire breaks out. Procedures to be followed in the event of fire are given in the special notices 'Fire Safety Instructions'*.
- ii. Every Imagination Europe Limited Office Manager or his/her equivalent must select a suitable location near to their office building as a designated Assembly Point in case of building evacuation.
- iii. All employees should become familiar with the content of these instructions.
- iv. Heads of Department and others responsible for employees, particularly newcomers should make them aware of the procedures to be followed.

* The 'Fire Safety Instructions' notice will be found in Appendix II. You will be aware that this notice describes the instructions in place at Imagination Europe Limited offices at 25 Store Street, London. The notice may be simply re-modelled for local use in any of our European offices, and strategically placed, as appropriate.

Fire Safety Instructions

If you discover a fire

- Operate the nearest Fire Alarm Break Glass.
- Notify Reception (dial '0' on any internal phone).
- Be prepared to leave the building immediately, using the nearest fire exit.
- If possible - without personal risk - attack the fire using a suitable fire-fighting appliance.
- If in any doubt leave the building using the nearest fire exit.

Upon hearing the fire alarm

- Leave the building using the nearest fire exit.
- Do not use the Lift.
- Do not stop to gather personal belongings.
- Make your way to the Assembly Point on Alfred Place. Do not re-enter the building.

The Fire Services will have been called. Please await further instructions, which will be issued.

APPENDIX III. Display Screen Equipment

MEETING THE REQUIREMENTS OF THE (DISPLAY SCREEN EQUIPMENT) REGULATIONS 1992: A STEP BY STEP GUIDE

Health Risks

- Upper limb disorders (including pain to back, legs, fingers, neck, shoulders, arms, elbows, wrists and hands)
- Temporary and permanent eye strain and headache
- Fatigue mental health and stress

Step 1. Identify People at Risk and their Workstations (office, agile & site)

Users

- People using DSE's more or less continuously most days
- More than 20 minutes use at a time, without breaks of 5-10 minutes
- Monotonous and lengthy tasks
- Have to transfer information quickly to or from a screen, and
- Use it in this way daily

Step 2. Teach Users and Assessors

User Training & Learning

- Risk from DSE work
- Importance of good posture and changing position
- How to adjust furniture to help avoid risks
- Organise the workplace to avoid stretching movements
- Avoid reflections and glare from the screen
- Activity changes or breaks if necessary
- Who to report problems to
- Contributing to the risk assessment

Workstation Competent Assessor Teaching

- How to review checklists
- How to identify obvious and less obvious risks
- Deciding when additional help is needed and where to go for it
- How to draw conclusions from risk assessments and identify steps to reduce risks
- Recording problems
- Communicating problems to those who need to take action

Step 3. Assess Workstations, Identify and Reduce the Hazards

Deal with the Biggest Problems First

- Investigate reports of aches and pains from users
- Poor posture, bad seating, glare
- Follow DSE workstation guidance*

Monitor User Use

- Forearms in the correct position
- Workstation use

Review Procedures (When to do this)

- Major changes (i.e. reconfiguration of office areas, moving to new premises, etc.)

- New users start work
- Change of user category (EA 2010)
- Agile working
- Site attendance for project delivery

Step 4. Plan Changes of Activity or Breaks for Users

Organising Users Work

- Vary the tasks, e.g. let typists walk across the room to pick up work
- Remind users to stretch, blink, and change position & alternate tasks
- Breaks should be taken before users are tired, rather than to recover
- Short frequent breaks

Step 5. Provide Eyesight Testing and any Necessary Prescriptive Correction for DSE Work **When Setting up a System for Providing Users with Eye and Eyesight Tests Consider the following:**

- Contact HR and seek advice from the HSEQ Manager
- Contact numbers of opticians, asking what they charge for eyesight tests and basic glasses/ approach the preferred source if there is one (using your own optician is also advisable if you have one).
- Ask for standard information about each user they test, if they need glasses for DSE work and how frequently the user should be re-tested

Step 6. Ensure that new Workstations Comply with the Regulation Schedule

Refer to the Schedule *

- Equipment to include: display screen, keyboard, work desk, work surface, work chair
- Environment to include: space requirements, lighting, reflections and glare, heat, radiation, humidity, fire safety and electrical safety

Step 7. Inform Users about what you have done

Give Users Information on:

- Health and safety relating to their workstations
- Risk assessment, and steps taken to reduce risks
- Breaks and changes of activity
- Eye and eyesight tests

(Advice is available to all workers and employees, though the duty of care may differ slightly with self-employed people)

Provide Information by:

- Requiring that employees take the Imagination DSE Safety Module training, which is accompanied by an online DSE assessment (2022)
- Telling employees (i.e. verbal instruction)
- Putting information in employees instructions on health and safety
- Circulars
- Wall charts
- Computer based information systems

* HSE Guidance DSE's – an easy guide to the Regulations (ISBN 0-7176-0804-2)

Please click here for more information and support: [INDG36 Working with DSE Equipment](#)

APPENDIX IV. Travel by Air: Health Considerations

Immobility, Circulatory Problems and Deep Vein Thrombosis (DVT)

Contraction of muscles is an important factor in helping to keep blood flowing through the veins, particularly in the legs. Prolonged immobility, especially when seated, can lead to pooling of blood in the legs, which in turn may cause swelling, stiffness, and discomfort.

It is known that immobility is one of the factors that may lead to the development of a blood clot in a deep vein, so-called “Deep Vein Thrombosis”, or DVT. Research has shown that DVT can occur as a result of prolonged immobility, for instance during long distance travel, whether by car, bus, train or air. The World Health Organisation (WHO) has set up a major research study to find out if there are any factors that might lead to the risk of DVT being higher for air travel than for other causes of immobility.

In most cases of DVT, the clots are small and do not cause any symptoms. The body is able to gradually break down the clot and there are no long-term effects. Larger clots may cause symptoms such as swelling of the leg, tenderness, soreness and pain. Occasionally a piece of the clot may break off and travel with the bloodstream to become lodged in the lungs. This is known as pulmonary embolism and may cause chest pain, shortness of breath and, in severe cases, sudden death. This can occur many hours or even days after the formation of the clot. The risk of developing DVT when travelling is very small unless one or more other risk factors are present. These include:

- Previous DVT or pulmonary embolism
- History of DVT or pulmonary embolism in a close family member
- Use of oestrogen therapy - oral contraceptives (“the Pill”) or hormone replacement therapy (HRT)
- Pregnancy
- Recent surgery or trauma, particularly to the abdomen, pelvic region or legs
- Cancer

- Some inherited blood-clotting abnormalities.

It is advisable for people with one or more of these risk factors to seek specific medical advice from their doctor or a travel medicine clinic in good time before embarking on a flight of three or more hours.

DVT occurs more commonly in older people. Some researchers have suggested that there may be a risk from smoking, obesity and varicose veins. Precautions The risk of a passenger who does not have any of the risk factors above developing DVT as a consequence of flying is small and the benefits of most precautionary measures in such passengers are unproven and some might even result in harm.

Some common-sense advice for such passengers is given below. Moving around the cabin during long flights will help to reduce any period of prolonged immobility. However, this may not always be possible and any potential health benefits must be balanced against the risk of injury that could occur if the aircraft encounters sudden and unexpected turbulence. A sensible compromise is to walk around in the cabin, e.g. go to the bathroom, once every 2–3 hours. Many airlines also provide helpful advice on exercises that can be carried out in the seat during flight. It is thought that exercise of the calf muscles can stimulate the circulation, reduce discomfort, fatigue and stiffness, and it may reduce the risk of developing DVT. Hand luggage should not be

placed where it restricts movement of the legs and feet, and clothing should be loose and comfortable.

Wearing properly fitted graduated compression stockings may be helpful. These compress the calf muscles and improve the flow of blood in the deep veins. They may also help prevent the swollen ankles that are quite common on long flights. However, they need to be the correct size to be effective and passengers should therefore ask their doctor or a travel medicine clinic which type would be appropriate for them. In view of the clear risk of significant side effects and absence of clear evidence of benefit, passengers are advised not to use aspirin just for the prevention of travel-related DVT. Those travellers who are at most risk of developing DVT may be prescribed specific treatments, such as injections of heparin. Cabin crew are not trained to give injections and travellers who have been prescribed these must either be taught to give the injections themselves or make other arrangements to have them given by a qualified person.

Jet Lag

Jet lag is the term used for the symptoms caused by the disruption of the body's internal clock and the approximate 24-hour (circadian) rhythms it controls. Disruption occurs when crossing multiple time zones i.e. when flying east to west or west to east. Jet lag may lead to indigestion and disturbance of bowel function, general malaise, daytime sleepiness, difficulty in sleeping at night, and reduced physical and mental performance. Its effects are often combined with tiredness due to the journey itself. Jet lag symptoms gradually wear off as the body adapts to the new time zone.

Jet lag cannot be prevented but there are some ways to reduce its effects (see below). Travellers who take medication according to a strict timetable (e.g. insulin, oral contraceptives, etc.) should seek medical advice from their doctor or a travel medicine clinic before their journey. General measures to reduce the effects of jet lag.

Be as well rested as possible before departure, and rest during the flight. Short naps can be helpful.

Eat light meals and limit consumption of alcohol. Alcohol increases urine output which can result in disturbed sleep by causing awakenings in order to urinate. Whilst it can accelerate sleep onset, it reduces sleep quality, making sleep less recuperative. The after effects of alcohol (hangover) can exacerbate the effects of jet lag and travel fatigue. Alcohol should therefore be consumed in moderation, if at all, before and during flight. Caffeine should be limited to normal amounts and avoided within a few hours of an anticipated period of sleep.

Try to create the right conditions when preparing for sleep. When taking a nap during the day, eyeshades and earplugs may help. Regular exercise during the day may help to promote sleep, but avoid strenuous exercise immediately before sleep.

At the destination, try to get as much sleep in every 24 hours as normal. A minimum block of 4 hours sleep during the local night – known as “anchor sleep” – is thought to be necessary to allow the body's internal clock to adapt to the new time zone. If possible, make up the total sleep time by taking naps at times when feeling sleepy during the day.

The cycle of light and dark is one of the most important factors in setting the body's internal clock. Exposure to daylight at the destination will usually help adaptation.

Short-acting sleeping pills may be helpful. They should be used only in accordance with medical advice and should not normally be taken during the flight, as they may increase immobility and therefore the risk of developing DVT.

Melatonin is available in some countries and can be used to help resynchronize the body's internal clock. It is normally sold as a food supplement and therefore is not subject to the same strict control as medications (for example, it has not been approved for use as a medication in the United States, but can be sold as a food supplement). The timing and effective dosage of melatonin have not been fully evaluated and its side effects, particularly if used long term, are unknown. In addition, manufacturing methods are not standardised and therefore the dose in each tablet can be very variable and some harmful compounds may be present. For these reasons, melatonin cannot be recommended.

It is not always appropriate to adjust to local time for short trips of 2–3 days or less. If in doubt, seek specialist travel medicine advice.

Individuals react in different ways to time zone changes. Frequent flyers should learn how their own body responds and adopt habits accordingly. Advice from a travel medicine clinic may be beneficial in determining an individual's most effective coping strategy.

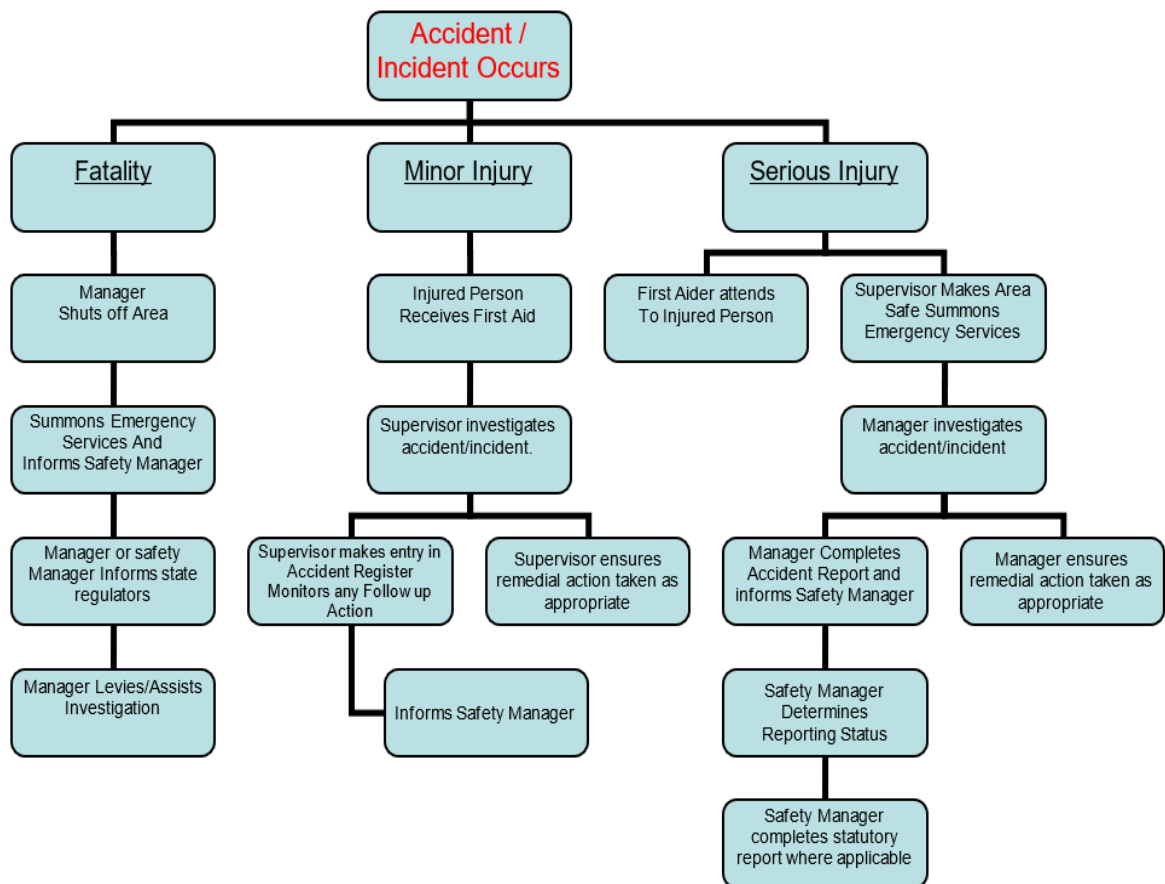
Further Reading

Aerospace Medical Association, *Medical Guidelines Task Force, Medical guidelines for airline travel, 2nd edition, 2003*, <http://www.asma.org>

British Medical Association, Board of Science and Education, *The impact of flying on passenger health: a guide for healthcare professionals, 2004*, <http://www.bma.org>

Please follow the link for more advice about tips for good health when flying. [Click Here](#)

APPENDIX V. RIDDOR - ACCIDENT/INCIDENT REPORTING



Company Procedures for Reporting and Recording Health & Safety Events at Work

When an incident, accident, near miss or dangerous occurrence takes place, (as defined by RIDDOR Regulations (2013)) it will fall into one of the following categories. The procedure to be adopted in each case is as follows:

Accidents Involving Injury

Non-fatal accident /incident to employee

- i. Ensure details have been recorded on the FYI-Intranet system as instructed as well as others hand-written means of recording provided for purpose, e.g. the office accident book or the on-site accident report form, copying record details to The Imagination Global Health and Safety Manager. FYI-Imagination will automatically inform the Global Head of Health & safety for reference , information and the commencement of any applicable investigation.
- ii. Where an employee is unable to work for more than 3 consecutive days because of the injury (excluding the day of the accident but including any subsequent days which may not have been working days e.g. weekends), complete an internal accident report form and send it directly to the company Health and Safety Manager. (In the UK a F2508 will be completed for any employee being unable to work for 7 consecutive days because of the injury, excluding the day of the accident but including any subsequent days which may not have been working days e.g. weekends)

- iii. If injured, an employee is admitted to hospital and is an inpatient for more than 24hrs the accident falls into the category ‘major injury’, and must be notified as such. (HSE informed or equivalent by Health & Safety Manager).

Accident/incident to person other than employee

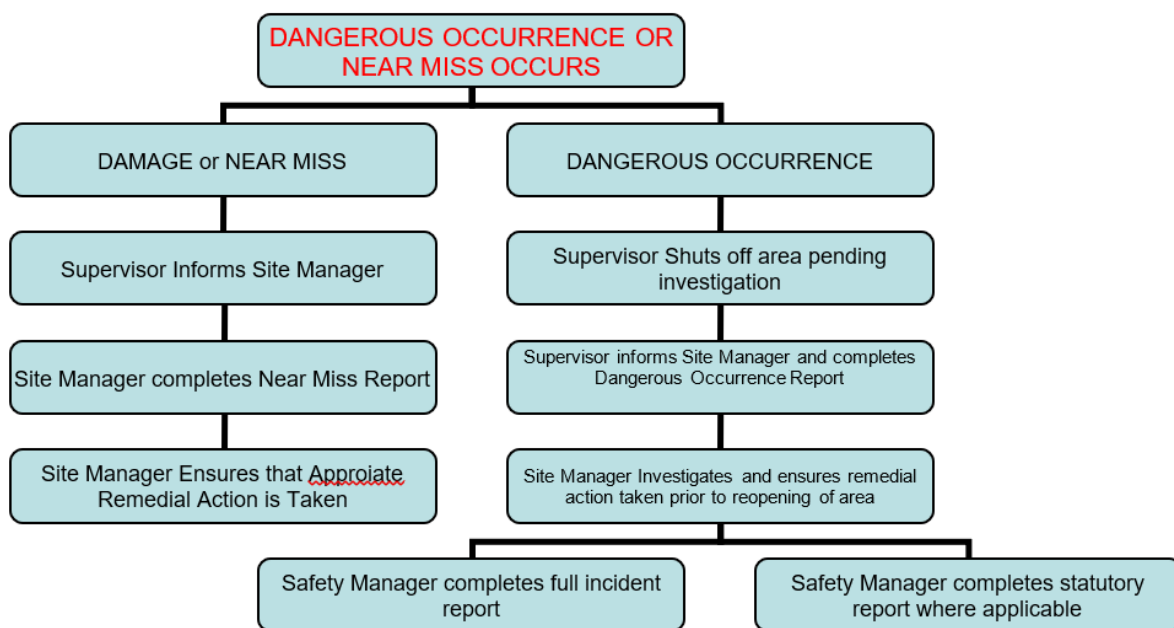
- i. Ensure details have been entered into the relevant register (as above)
- ii. The responsible person at the workplace e.g. House Manager, Foreman, Crew Chief, etc should notify his own employer, who will follow procedures from within their own organisation.

Major Injury/Fatal Accident

In the event of a specified major injury or a fatal accident occurring to ANY PERSON arising out of or in connection with our work, immediately telephone the Safety Advisor for the project or building.

Imagination Europe Limited.
 Health and Safety Manager - Debra Kilvington
 Telephone: +44 (0) 7771 655 108

Note: Where an accident takes place on Imagination premises, the Facilities Manager acts as Site Manager



Near Miss or Dangerous Occurrences

- i. Any ‘near miss’ or dangerous occurrences, regardless of absence of injury, damage or loss, must be reported to the relevant Head of Department at the earliest possible opportunity with a record copied to The Imagination Group Health & Safety Manager.
- ii. The Head of Department will investigate the incident and take all steps necessary to prevent a recurrence.
- iii. Details of the investigation and follow-on procedures will be recorded on an Imagination standard report sheet, with a copy being issued to The Imagination Group Health and Safety Manager.



- iv. The Health & Safety Manager will decide on the status of 'Dangerous Occurrence' and report to HSE or equivalent.

Note: Where a near miss or dangerous occurrence takes place on Imagination premises, the Facilities Manager acts as Site Manager.

APPENDIX VI. Freelance and Temporary Employees

In terms of our common welfare and its corresponding duty of care, we are all Company employees. This includes those occupying temporary positions with specific responsibilities toward the Company regardless of contract or contractual arrangements. The Company Policy exists for our benefit - for our health, safety and welfare at work.

Temporary employees (e.g. contract and agency employees) are treated as Company employees for the purpose of the Company Policy. They should undertake the same responsibilities as Company employees together with those of any post in the Company health and safety organisation to which they are appointed.

The success of the Company Policy depends essentially on our contributions to the health and safety measures that constitute it. As employees we all have responsibilities for which the main legal instrument we refer to is the United Kingdom's Health and Safety at Work Act etc 1974. Attention is drawn to the following responsibilities:

- i. Knowing the scope of matters covered by the Health and Safety Policy and being conversant with those parts relevant to our places of work and the work we do.
- ii. Reading health and safety notices e.g. fire actions displayed at our places of work and being prepared to act on them in an emergency.
- iii. Some general advice:
- iv. Be alert at all times to detect hazards, particularly those arising from changed circumstances.
- v. Be prepared to ask whenever a health and safety measure is not fully understood or whenever faced by a problem or unforeseen situation. It would be foolish to put oneself or others at risk for fear of appearing uncertain.
- vi. Be aware of and make allowance for the effect of fatigue and stress.
- vii. Have your own and others' health and safety in mind when planning and carrying out work.