



# **Imagination Europe Ltd Health & Safety Policy**

**Policy Owner:** Global Head of Health & Safety  
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## **1.0 COMPANY POLICY FOR HEALTH AND SAFETY**

This Policy has been developed due to Imagination Europe Limited's responsibilities under Section 2(3) of the Health and Safety at Work Act 1974 to have a written Policy. Under Regulation 5(2) of the Management of Health and Safety at Work Regulations 1999, it is also a requirement to document our processes of effective planning, organisation, monitoring and review of our health and safety preventative measures.

### **1.1 IMAGINATION EUROPE LIMITED POLICY**

#### **The Company's Policy is as follows:**

- To take its responsibilities for health and safety seriously. Our ambition is to ensure that everybody working for us is provided with a working environment that is safe with safe systems of work as far as reasonably practicable.
- To comply with the requirements of Government legislation and the relevant government legislation within the countries it operates, and to provide health and safety standards which exceed the legal requirements whenever possible.
- To identify hazards within the workplace and assess risks to health and safety of employees, clients, visitors, contractors and others who may be affected by our activities.
- To implement measures to control identified hazards by removing or reducing the risks as much as possible.
- To provide safe and healthy working conditions by careful supervision, qualification and training, as required.
- To ensure every new employee is provided with health and safety guidance on joining and to make them aware of health and safety procedures and processes at Imagination.
- To ensure that high standards of fire safety and fire prevention are maintained.
- To ensure employees and others who may work at or visit our premises are aware of the process to be followed in the event of fire or other emergency, including safe evacuation.
- To standardise procedures for accuracy in reporting health and safety 'events' such as incidents and accidents.
- To ensure the continued suitability and sufficiency of our arrangements for health and safety, working practices and environments will be reviewed regularly to ensure best practice.

To ensure so far as reasonably practicable, the management and conducting of our work activities in such a manner to ensure the health, safety and welfare at work of our employees and others, Imagination Europe Limited will provide information, training and supervision.

Anybody 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 and suppliers have a duty of care to follow instructions from their line managers to ensure a healthy and safe workplace for themselves and others who may be affected by their work.

Imagination Europe Limited will consult with employees on matters of health and safety and welfare to ensure that they are aware of and understand their responsibilities under current legislation.



This Policy will be kept up to date, particularly as the business changes in nature and size. This Policy will therefore be reviewed on an annual basis or sooner if necessary to allow for changing circumstances and to ensure operational effectiveness.

Approved by: **Richard Hannah, MD UK and Europe**

Signed: 

Date: **11/05/2026**

To be reviewed in May 2027

## 2.0 ORGANISATION FOR HEALTH AND SAFETY

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

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

Imagination recognises that to successfully implement this Policy, it is important to have a robust management system in place and to put into effect measures to remove or reduce risks to health and safety as far as is reasonably practicable.

The successful implementation of this Policy relies on:

- accepting a shared responsibility involving the cooperation of all employees and managers
- an acceptance by everybody within the organisation of their responsibility to take care of the health and safety of themselves and anybody who could be affected by their actions
- everyone has a 'duty of care' to act responsibly, anticipating problems and putting measures in place to prevent them occurring

### 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	Rudolfplatz 3, 50674 Cologne, Germany



## 2.2 Imagination Europe Limited Board of Directors

CFO	Mark Chappell
MD	Richard Hannah
CEO	Patrick Reid
Director	Ross Wheeler
Chairman	Gary Withers

## 2.3 Responsibilities of the Board

The overall responsibility for occupational health and safety lies with the Imagination Europe Limited Board of Directors.

With regard to Imagination Europe Limited, Richard Hannah, MD, 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.

As the Director with responsibility for health and safety, the MD has the following responsibilities:

- overall responsibility for health and safety including ensuring that appropriate resources are in place to implement the health and safety Policy
- ensuring health and safety performance is reviewed regularly at board level
- monitoring the effectiveness of the health and safety Policy

Directors / Business Directors are responsible for:

- the effective implementation and management of the health and safety Policy
- making sure that health and safety legal requirements are complied with and suitable processes are in place
- monitoring staff performance with relation to health and safety, 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
- ensuring that adequate health and safety information and training is provided
- bringing the Policy and future revisions to the attention of all employees
- ensuring that all new employees go through an induction process that includes Imagination's health and safety standards and procedures
- ensuring appropriate consultation on health and safety matters with employees takes place

## 2.4 Responsibilities of each Department Head/Manager

Department heads and managers responsible for the supervision or management of one or more employees are to ensure:

- the effective management of health and safety under their area of responsibility
- safe systems of work are put in place and the results monitored effectively
- hazards are identified and assessed, risks are recorded, safe systems of work are followed and the premises and equipment are regularly inspected, maintained and in a good state of repair
- faults are reported when required

- procedures such as fire alarms and evacuations are carried out and all equipment is tested regularly to ensure it is safe to use
- employees are aware of all fire precautions, equipment and emergency procedures
- training requirements are identified
- all employees are adequately trained for their roles
- appropriate liaison with contractors and clients on health and safety matters
- PPE requirements are adhered to and the PPE provided to employees is used and worn
- any health and safety related issues are reported, and accidents and dangerous incidents investigated
- they set a good example with regards to health and safety

## **2.5 Responsibilities of All Employees at Imagination**

Employees have a legal responsibility to act responsibly, take reasonable care for their own health and safety and for those around them who might be affected by their actions.

All employees are responsible for acting in a safe manner throughout the course of their work regardless of their role. By understanding their responsibilities and following safety rules and regulatory requirements, employees will help Imagination to comply with legal duties and to positively contribute to the safe running of our business.

All employees have a responsibility to:

- comply with Imagination's Policies and procedures, and health and safety rules
- take reasonable care of the safety of those who might be affected by our actions
- 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
- adhere to any PPE requirements and wear the equipment provided as directed
- not undertake any tasks they are not properly trained to do
- to report any incident (accident, dangerous occurrence, near miss) and any other event
- to report any hazards, defects or damage to plant machinery, equipment and tools or any shortcomings in the existing safety arrangements
- to follow a safe system or work, and to evaluate hazard and risk as any changes may occur, to ensure any risk is suitably controlled
- to lead by and set a good personal example in relation to health and safety at work
- suggest any improvements to procedures or systems of work
- to undertake any health and safety training courses as requested by Imagination in pursuit of skill, knowledge, competence, experience and qualification
- cooperate with Imagination on all health and safety matters
- advising if they are unfit to undertake any activities

## 2.6 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:

- ensuring that the appropriate action is taken on any matters brought to their attention regarding the Imagination Group Policy Statement and the Imagination Europe Limited Health and Safety Policy
- investigate employee complaints concerning health and safety at work
- ensuring the Health and Safety Policy is implemented across Imagination
- coordinating and implementing how risk is assessed and controlled
- maintaining an accident and incident record system, investigating accidents or incidents as necessary and making any necessary reports to statutory bodies
- making periodic inspections of workplaces
- reviewing this Policy periodically and preparing drafts of any necessary changes.
- maintaining and promoting arrangements for consultation with employees on health and safety matters
- identifying any training requirements for employees
- seeking the advice of external health and safety agencies when necessary
- advising on matters concerning safety, statutory legislation and accident prevention
- informing the board of any new or amended statutory legislation that may have an impact on the company's activities
- delivering a monthly health & safety report to the Group Services board

## 2.7 Operational Duty of Care for All Employees

Each employee has a duty to:

- work safely, conduct themselves in a safe manner, take reasonable care for the health and safety of themselves and others, and avoid taking shortcuts or fail to follow established procedures which might compromise health, safety or the work environment
- 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
- carry out work activities in accordance with Imagination Europe Limited safety procedures, instruction and standards
- cooperate fully with management and supervisors to ensure that Imagination's health and safety responsibilities are fulfilled
- become familiar with any information issued by Imagination Europe Limited on the safe use of equipment, plant and materials, including the use of PPE as directed
- alert their line manager to any potential hazards, which have been identified in the course of their work

Employees must not:

- participate in any act which they know may endanger themselves or their colleagues
- jeopardise the integrity of equipment or installations provided for safety

- undertake any task or operation for which they have not received adequate training or for which they lack suitable tools, equipment or PPE
- operate plant machinery or equipment which they know to be in an unsafe condition

Any breach of health and safety rules may be considered a serious disciplinary issue. Employees who deliberately avoid following these rules may be subject to a gross misconduct investigation, particularly when their actions result in injury, danger or harm to others.

## **2.8 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.

## **3.0 ARRANGEMENTS FOR HEALTH AND SAFETY**

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, preventing accidents and mitigating accidental occurrences.

Imagination Europe Limited will ensure there is ongoing consultation with employees, clients and contractors on health and safety issues. Our risk assessment will be reviewed annually and amended as required.

Departmental Managers are charged individually with the implementation of the arrangements that are applicable within the remit of their designation.

Anybody working for / with Imagination is to be aware of the required health and safety standards, fire safety and prevention processes, and the appropriate action to take in an emergency situation. Certain employees with additional responsibilities such as fire wardens will be offered training

in dealing with emergencies, including emergency evacuation of the premises. Suitable firefighting equipment is available for use by those who are trained to use it, should it be required if an incident occurs. Trained first aiders and first aid facilities are available on all floors.

Managers are to consider the additional needs of young people or those with various access requirements. Legislation may apply and should be complied with. Safe processes and certain working practices may need to be adapted to suit the needs of young people or individuals with reduced mobility and other access requirements.

### **3.1 Accident/Incident Reporting**

All instances of personnel injury and damage to property or equipment, 'dangerous occurrence', accidents 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 to ensure remedial measures are taken to prevent a recurrence. As required by RIDDOR, managers must also report incidents to the relevant enforcing agency within the specified timeframe.

### **3.2 Management Accountability**

Imagination Europe Limited considers that the most effective and satisfactory way of implementing its 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.

It is possible that organisational issues may be identified through the implementation of this Policy. These may include:

- insufficient training of managers
- inadequate awareness of staff
- inadequate supervision
- the Policy or the processes implemented by Imagination requiring review or enhancement

Any issues causing concern should be reported to the appropriate Director and remedial action taken.

### **3.3 Employee Rights**

Imagination Europe Limited recognises the importance of consultation 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 employee / team meetings, where the views of all employees will be taken on board. The aim shall be the promotion of safe working practices and the development of a high level of health and safety awareness.

Employees are entitled to work in a safe and secure environment, with any equipment provided regularly tested and maintained so it is safe to use.

Employees should only carry out work that they are trained for and capable of carrying out.

Employees should raise any concerns with their line manager immediately or escalate them to the Global Head of Health and Safety.

### **3.4 Maintenance of Facilities and Equipment**

The appropriate managers are to ensure that maintenance and service schedules are in place and undertaken. Employees should only use equipment or materials if line managers are satisfied that ongoing maintenance has been carried out successfully.

The premises are to be regularly cleaned to ensure they are kept safe and good housekeeping should be prioritised. Maintenance inspections should take place and any repairs required should be made as soon as practicable.

All equipment and machinery provided by Imagination will comply with the relevant standards and legislation for the purpose for which it is used.

All employees who use equipment must be trained how to use it safely.

Employees must use PPE when instructed. PPE should be used properly according to manufacturer guidelines, stored correctly and any defects should be reported.

### **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.

All managers and the Global Head of Health and Safety will look at training needs for individuals and teams with regards to health and safety . Specialist trainers may be contracted to deliver training either on our premises or at external venues.

### **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 Review of Policy**

This Policy will be regularly updated and revised as appropriate to adapt to evolving circumstances or take account of any changes in legal obligation. It will undergo an annual review and all updates will be communicated to employees.