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Health & Safety Policy

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Version History

Version No.	Date (DD/MM/YYYY)	Change Description	Author
0.1	14/01/2025	Initial Draft	Rik de Vocht Arron Stobbs
1.0	12/02/2025	Approved	Rohit Advani

1. INTRODUCTION

nLighten is dedicated to safeguarding the health, safety, and welfare of all involved in our construction projects. This policy embodies our commitment to international best practices, continual improvement, and compliance with industry standards, ensuring a safe working environment across our operations in Europe.

2. PURPOSE & SCOPE

Purpose: To establish a comprehensive framework for health and safety management, aligning with EU directives, UK laws and industry standards, while fostering a culture where every worker actively participates in safety.

Scope: This Policy applies to all entities or sites within the nLighten Group (hereinafter "nLighten") where:

- nLighten has control.
- nLighten is the client to (sub)contractors.

It therefore concerns all employees, customers, partners and third parties of nLighten.

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3. POLICY STATEMENT

nLighten is committed to ensuring and providing a safe and healthy workplace for its employees, customers, members of the public and anyone else who is affected by our operations. With this approach, nLighten aims to prevent work-related injury and ill health.

The company commits to operating in accordance with the EU Occupational Safety and Health Framework Directive, United Kingdom's Health and Safety at Work (etc) Act 1974, The Management of Health & Safety Regulations 1999 and all other applicable regulations and codes of practice, so far as is reasonably practicable, to fulfil legal requirements.

The management will ensure that significant hazards are eliminated, risks are assessed, and suitable and sufficient measures are adopted to allow each employee/contractor to carry out his/her duties safely and without risk to health. Suitable equipment will be provided and maintained in a safe condition, and safe systems of work will be devised.

nLighten Management will provide all necessary resources including time to ensure that all Health and Safety matters are adequately funded. This includes training, personal protective equipment, adequate equipment/tools, maintenance for this equipment, external advice where necessary and any other resources necessary to ensure the Health and Safety of our staff. This framework will provide the possibility for setting objectives and tracking performance.

The company shall strive to achieve continual improvement in Health & Safety performance.

Each employee/contractor will be made aware of his/her responsibility for his/her own Health and Safety and that of others. All employees/contractors will be given the opportunity to consult with the management on matters relating to Health and Safety or to appoint a representative to do so.

The company will seek external advice as necessary to keep its Health and Safety Policy, working practices and equipment up to date and in accordance with current legislation.

Ultimate responsibility in all areas of Health and Safety rests with the Chief Executive Officer (CEO). This duty is of no less importance than any of the responsibilities attached to that position.

Reviews of the Health and Safety Policy will be made annually. The monitoring of all issues relating to this Policy is the responsibility of the Chief Executive Officer.

DocuSigned by:

13 February 2025 | 14:16 CET

Signed……2F44B23846764B1… Date……

Harro Beusker

Chief Executive Officer

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4. ROLES AND RESPONSIBILITIES

The company is managed by the CEO who is directly responsible for Health and Safety matters within the company. The responsible person will seek external assistance where necessary to ensure that the company meets both its statutory obligations and the objectives laid down in this Health & Safety Policy.

- **Chief Executive Officer (CEO)**: Ultimate responsibility for health and safety.
- **Senior VP Operations:** Oversees strategic planning, process optimisation, resource allocation, and cross-department coordination, ensuring efficient execution and profitability of construction projects.
- **VP Construction & Capital Projects:** Responsible for the organisation of the construction projects and for ensuring that the company's Health & Safety Policy and associated procedures are implemented by all construction projects.
- **Senior Director Compliance:** Responsible for Compliance, the Integrated Management System, an up-to-date Document Management System, and HSE strategic oversight.
- **Senior Health & Safety Manager, Construction Health and Safety Lead:** Oversees implementation of HSE policies, conducts site audits, and manages proactive coaching of Contractors while onsite.
- **Operations Directors:** Responsible for daily HSE requirements, task allocation, and supervision.
- **Site/Operations Manager:** Ensure all HSE activities are adhered to by their teams.
- **Construction Project Managers:** Oversees planning, coordination, budget management, and communication, ensuring timely and compliant project completion.
- **Employee**

  Each and every employee/contractor has a statutory duty to take reasonable care in relation to his/her own health & safety. Therefore, it shall be the duty of all employees/contractors whilst at work:

  - To take reasonable care for the Health & Safety of themselves and others, who may be affected by their acts or omissions at work.
  - To co-operate with the employer to ensure compliance with all the company Health & Safety policies and procedures.
  - To refrain from intentional or reckless interference with equipment and/or systems provided in the interest of Health, Safety and the Environment.
  - To co-operate with management when required on accident prevention and all procedures with regard to Health, Safety and the Environment as set out in the Health & Safety at Work etc. Act and the Environmental Protection Act and all associated Regulations and Approved Codes of Practice (ACOPs).
  - To maintain good standards of housekeeping within company and client premises.
  - To report any accident or incident including near-misses (whether or not personal injury results) to the company management.
  - To report any defects in equipment without delay to their immediate Supervisor and not to attempt repairs which they have not been authorised and specifically trained to undertake.
  - To ensure that no potentially hazardous item, substance or machine is brought on to site or used without the prior knowledge and authority of their immediate Supervisor.
  - To use and if applicable wear any item of Personal Protective Equipment. It is a requirement of law that any equipment supplied for safety must be used, and when not in use it is properly cleaned, stored and maintained.

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- To undergo any Health, Safety, Environmental and operational training deemed necessary by the company.

- **Contractor**

All Contractors and Principal Contractors have specific duties placed upon them under these regulations and all must be aware and endeavour to comply. The regulations spell out these requirements for both Contractors and Principal Contractors. All personnel have been made aware of these duties through "in-house" training. The CDM applies to building, civil engineering, maintenance and engineering construction work.

Co-operation of employees, contractors and others

Every person involved in works must seek the co-operation of any other persons concerned at the same or adjoining site so far as necessary in order to ensure all may carry out works safely. Similarly, they must co-operate to ensure others may continue with their works safely.

All persons involved must report anything which is likely to endanger the health or safety of themselves or others.

Supervisors have been appointed in order to ensure work is managed such that it may continue safely where multiple trades or activities may be ongoing simultaneously. Liaison with others allows arrangements to be made that enable all to continue to work safely.

Co-ordination of activities

All persons must co-ordinate their activities with one another in a manner such that "so far as is reasonably practicable", the health and safety of persons carrying out the work and anyone affected by the construction work will remain safe from harm at all times. It is recognised that all works may not be able to continue at the same time, therefore Supervisors will discuss and plan such that the project may progress safely.

Prevention of accidents

Every person must ensure general principles of prevention are applied "so far as is reasonably practicable", to ensure the safety of all and works during all stages of a project. This is a priority in all activities and the business ensures that method statements and risk assessments are produced identifying arrangements for safe working. All personnel are briefed on these to ensure they understand these arrangements and the risks that may be encountered by not following procedures.

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5. HEALTH & SAFETY MANAGEMENT

5.1 Key Principles

- **Hierarchy of Control:** Systematic approach to eliminating hazards where possible prioritising control measures in order of effectiveness.
- **Risk Assessments:** Detailed and specific evaluations for all operations, with dynamic assessments for changing conditions.
- **Preventive Measures:** Proactive implementation of controls to minimise risks.
- **Emergency Preparedness:** Detailed emergency response plans, including chemical spill responses.
- **Coordination and Communication:** Collaborative safety management across all stakeholders.
- **Regulatory Compliance:** Commitment to exceed legal standards, incorporating mental health support and technological advancements.
- **Continual Improvement:** The Plan-Do-Check-Act (PDCA) cycle is a fundamental framework used for continual improvement in various processes, particularly in health and safety management.

5.2 Incident Management

It will be the responsibility of nLighten staff to notify their manager of any Accident that requires first aid or could require medical attention in the aftermath and any Incident or Serious near miss during work hours.

Immediate Response: Secure, treat, and notify within 2 hours.

- **Reporting:** Initial within 24 hours, comprehensive within 3 days.
- **Underlying, Immediate and Root Cause Analysis:** Learn and prevent future incidents through systemic review.
- **Lessons Learned**: Document and share insights from incident investigations across all projects.
- **Continual Improvement**: Establish an improvement loop that integrates audits, lessons learned, and periodic reviews to enhance safety standards over time.
- **Audits and Reviews**: Conduct regular audits to verify corrective actions and identify areas for improvement.
- **Feedback Loops**: Incorporate findings into training and policy updates to enhance safety culture.

5.3 Emergency Response

- **Plans**: Develop site-specific emergency response plans.
- **Drills**: Conduct regular drills for fire, medical, and evacuation scenarios, critical operations systems failures.
- **Communication**: Ensure emergency contacts and procedures are displayed prominently on-site.

5.4 Welfare, Hygiene & First Aid Standards

- **Facilities:** Ensure clean welfare facilities, with mental health considerations, must be dust and noise free with suitable seating areas and food preparation facilities.
- **First Aid:** Maintain stocked kits and trained personnel, including mental health first aid.
- **Monitoring:** Regular checks and drills to ensure compliance.

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5.5 Control of Hazardous Substances

- **Assessments for control of substances hazardous to health:** Evaluate and control substance risks using an environmental health and exposure manual.
- **Storage and Handling:** Secure, managed, labelled, and with appropriate PPE use. Do not store what is not required onsite.
- **Training:** Educate on safe practices for handling hazardous materials.

5.6 Personal Protective Equipment (PPE) Standards

- **Guideline:**
    - Construction projects have mandatory 5-Point PPE. Including instruction, maintenance and cleanliness to ensure effectiveness.
    - Live operations have an activity and risk-based PPE requirement. Including instruction, maintenance and cleanliness to ensure effectiveness.
- **Inspections:** Regular checks and immediate replacement if compromised.
- **Compliance Monitoring:** Educational and corrective action for non-compliance.

5.7 Drug & Alcohol Policy

- **Zero-tolerance:** No drugs or alcohol on-site.
- **No person should be under the influence:** No person under the influence that could impair their ability to perform tasks safely.
- **Prescription medication:** All prescription medication should be confidentially informed to Manager's and HR.

5.8 Slips, Trips and Falls

- **'Sensible footwear'**: Specifying flat shoes in reasonable condition to maximise sole / floor contact and friction. Flip flops or anything greater than 3" heel should not be considered appropriate workwear.
- **Housekeeping**: Good housekeeping to keep the workplace free of clutter and obstructions, all cables to be made safe as to not be a trip hazard.
- **Suitable cleaning materials**: Methods and equipment to properly clean up spills and other contaminants. Staff must not walk by an unsafe act or unsafe condition.
- **Workplace management**: Control of cleaning and maintenance activities to ensure no additional hazards are introduced. This includes considering winter weather conditions.

5.9 Ergonomics and Display Screen Equipment / Visual Display Unit

Ergonomic safety: nLighten shall focus on optimising the interaction between workers and their work environments. To minimise physical strain and discomfort, which can lead to injuries.

- Compulsory Display Screen Equipment / Visual Display Unit (DSE/VDU) training shall be given within a timely onboarding period for all staff that work with DSE/VDU within their working day for periods longer than 30mins. The training shall be repeated on an annual basis as a minimum. This training must also be incorporated into home working where staff shall be implored and trusted to use the training to ensure suitable and sufficient home working conditions as to not cause long term ill health or injury.

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5.10 Fire & Means of Escape

- **Fire Safety Management:** The use of fire prevention and protection strategies to protect people, the building and other assets.
- **Means of Escape:** Properly designed and signposted escape routes so that occupants can escape to a place of total safety unaided.

5.11 Electromagnetic Interference and Artificial Optical Radiation, Electromagnetic Exposure

- **Electromagnetic Risk Assessment:** Site-specific assessment must be completed on all sites that have Artificial Optical Radiation and Electromagnetic Field Exposure.
- **EMI Awareness:** Training on how to prevent and manage EMI, which can affect sensitive electronics during construction or maintenance. Persons with pacemakers must consider their work area and EMI equipment.
- **Equipment Isolation:** Procedures to isolate or protect electrical devices from construction activities that might generate EMI.

5.12 Data Security

- **Physical Access:** Control physical access to areas containing sensitive data or equipment, with security checks and clearances.
- **Data Protection:** Protocols to ensure construction or maintenance activities do not compromise data security, including the handling of devices or cables.

5.13 Selection of Contractors/Contractor Compliance Failures

- **Pre-Qualification Questionnaires (PQQ):** Use PQQs to assess contractor competence and compliance history.
- **Tender Evaluations:** Include safety performance metrics as part of tender evaluations.
- **Approval:** Select contractors based on demonstrated ability to meet nLighten's safety standards.

5.14 Operations and Maintenance Manual

- **Documentation:** Maintain accurate records of project designs, warranties, and maintenance schedules.
- **Accessibility:** Ensure files are organized and accessible to relevant stakeholders.
- **Compliance:** Align with UK CDM 2015 regulations for end-of-project handovers

5.15 Health and Safety File

- **Content:** Include risk assessments, method statements, and inspection records.
- **Updates:** Maintain as a live document throughout the project.
- **Handover:** Provide the final file to the client upon project completion in compliance with CDM regulations.

5.16 Portable Appliances

- **Suitability:** Work equipment provided for use at work is constructed or adapted to be suitable for the purpose for which it is used or provided.
- **Inspection & Testing:** Portable equipment is likely to be subjected to, and more vulnerable to, physical damage and wear, or harsh treatment when in use. A system of periodic inspection and testing is necessary to demonstrate that the equipment is safe to use.

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5.17 Site Safety Audits & Monitoring

- **Frequency:** Weekly for high-risk, bi-weekly/monthly/yearly for others and accreditation audits.
- **Audit Focus:** Performance and compliance based, technology use, behavioural assessments, and improvement opportunities.
- **Reporting:** Actionable feedback to enhance safety practices.

5.18 Training and Competence

- **Inductions:** Mandatory onboarding and induction-specific safety training.
- **Ongoing Training:** Regular updates, with specialised courses for high-risk activities and mental health awareness.
- **Competence Checks:** Verify training and qualifications, knowledge and experience before task assignment.

5.19 Policy Review and Compliance

- **Annual Review:** Align with legal changes, business requirements, and industry standards.

6. HIGH-RISK ACTIVITIES

It is a policy of nLighten that no employee or sub-contractor will be made to work in dangerous conditions without due regard to health and safety and all employees should be aware that there are regulations and procedures regarding serious or imminent danger.

All High-Risk Activities must be assessed within the hierarchy of control, to eliminate where possible the requirement to work under high-risk conditions.

Managers, supervisors and employees are reminded that they must not under any circumstances undertake work or instruct others to undertake work where there is a risk of imminent danger without the correct levels of personal protective equipment, training and safety procedures being in place.

ALL high-risk activities (HRA) must be subjected to a Permit to Work that has a minimum of a two-tier sign-off.

The business authorises any employee to remove himself/herself to a relative place of safety when he/she has reason to believe he/she is at serious risk or in imminent danger. Work will not resume in that area until the problem has been neutralised.

Some emergency events can occur and develop rapidly, thus requiring employees to act without waiting for further guidance, for example, in a fire. Employees must, on arrival at new sites, attend a site induction which will make them familiar with the emergency procedures, escape routes and location of firefighting equipment etc. before starting work. Some high-risk activities require additional (external) emergency response training and competency.

Under no circumstances will work activities take priority over safety considerations.

6.1 Electrical Safety

- **Risk Assessment:** Detailed assessments for electrical work, focusing on high-voltage installations.
- **Lockout/Tagout Procedures:** Strict protocols to ensure no accidental energisation during maintenance or setup.

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- **Training:** All workers involved in electrical tasks must have specialised training in electrical safety, including emergency response for electric shocks.

6.2 Working at Heights

- **Fall Protection:** Use of harnesses, guardrails, and safety nets, with a focus on securing all platforms and ladders in data center environments where space can be restricted.
- **Access Control:** Control access to elevated areas, ensuring only trained personnel with proper authorisation can work at heights.
- **Inspection of Equipment:** Regular checks on all height safety equipment, especially critical in data centers with complex infrastructure.

6.3 Hot Work

- **Permit System:** Implement a hot work permit system for any work involving open flames or sparks, considering the high risk of fire in data centers due to flammable materials.
- **Fire Watch:** Mandatory fire watch during and after hot work activities, equipped with fire extinguishing tools.
- **Containment:** Use of fire-resistant barriers or blankets to contain sparks or heat in areas near sensitive equipment.

6.4 Heavy Machinery and Lifting Operations

- **Crane and Lifting Plans:** Detailed plans for every lift, considering the limited space and high precision required in data centers.
- **Operator Competence:** Only certified operators for machinery, with additional training on navigating data center layouts.
- **Load Management:** Ensuring loads are balanced and secure, particularly in tight spaces where visibility and manoeuvrability are reduced.

6.5 Hazardous Materials

- **Type & Amount:** The type (hazard classification) and amount of hazardous materials brought to the site shall be communicated and kept to a minimum working requirement.
- **Specialised Storage:** Secure storage of batteries, chemicals, or gases used in data centers, with specific protocols for handling and disposal.
- **Emergency Spill Response:** Tailored spill response kits and training for dealing with leaks, particularly for substances that could damage electronic components.

6.6 Confined Spaces

- **Entry Permit System:** Strict controls for entering confined spaces common in data center infrastructure like server rooms or utility tunnels.
- **Atmospheric Monitoring:** All areas within and surrounding data centers must be free of extreme atmospheric conditions not suitable for life to continue.
- **Rescue Plans:** Pre-established rescue plans for workers in confined spaces, considering the complex layout of data centers.

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6.7 Vibration and Noise

- **Exposure Limits:** Monitor and control exposure to noise and vibration to protect workers' health and ensure equipment functionality.
- **Control Measures:** Use of noise and vibration-dampening materials or methods, especially during activities like drilling or heavy equipment operation near operational areas.

6.8 Raised Access Flooring

- **Controls:** Secure all floor openings with appropriate barriers or covers.
- **PPE:** Ensure workers wear safety eyewear, knee pads, shin pads, gloves, bump caps and safety footwear.
- **Training:** Provide specific training for working under and around raised access floors.
- **Emergency Plans:** Have rescue procedures in place for confined spaces below raised flooring. Confined spaces are defined as limited access and egress with a specified hazard. (open to interpretation)

6.9 Asbestos, Chromium 6 and Lead paint

- **Hazardous substance surveys:** To determine site-specific hazards and control measures before construction or maintenance work starts. Asbestos will need to be disposed of in a controlled manner.

6.10 Excavations

- **Risk Assessments:** Site-specific evaluations to identify potential hazards such as cave-ins or utility strikes.
- **Protective Systems:** Use of shoring, shielding, and trench boxes where required.
- **Access and Egress:** Safe entry and exit points for all excavations exceeding 1.2 meters in depth.
- **Inspections:** Daily checks by a competent person to ensure excavation safety

Conclusion

At nLighten, our commitment to health and safety goes beyond compliance, it is about creating a culture where people are empowered to think and act safely, not just follow rules. We recognise that not all hazards translate into risks, and safety should not be reduced to a bureaucratic exercise of ticking boxes. Instead, we take a modern, dynamic approach that prioritises awareness, understanding, and proactive behaviour.

True safety is driven by people and behaviours, not just policies and paperwork. While structured procedures and risk assessments are essential, they are only effective when backed by a workforce that is engaged, informed, and willing to challenge unsafe practices. A rule book will never prevent an accident, but the right mindset and shared accountability will.

Every employee, from leadership to site operatives, plays a crucial role in shaping this safety culture. We expect everyone to think critically, question outdated methods, and contribute to continual improvement. Safety should be practical, not bureaucratic, a set of guiding principles that support efficiency and innovation rather than hinder progress.

We believe that a safe workplace is an efficient workplace, and our goal is to create an environment where people feel valued, confident, and able to work without unnecessary obstacles. By focusing on human factors like communication, leadership, and behaviour, we will achieve higher safety standards than any checklist ever could.

At nLighten, the expectation is simple: Look out for yourself. Look out for each other. Make safety a natural part of how we work—not just a requirement, but a responsibility we all share.

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APPENDIX

Appendix A: Safety File

Contains essential safety documentation, including risk assessments, method statements, and emergency procedures.

Appendix B: Safety in Design Risk Register

A live register developed with the design team to track and mitigate design-related risks.

Appendix C: Reporting Template

Weekly and monthly reporting templates to standardize submission of safety metrics.

Appendix D: Minimum Construction Requirements – High-Risk Activities

Outlines specific safety requirements for HRAs, including confined spaces, hazardous substances, and working at height.