

R&M POLICY · HEALTH AND SAFETY

Occupational Health Policy

R&M Property Group Ltd

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1. Purpose

R&M Property Group Ltd recognises that occupational health - the prevention of work-related ill health and the promotion of physical and mental wellbeing - is as important as the prevention of workplace injury. This policy sets out R&M's arrangements for managing occupational health risks across all construction and development activities, including the company's commitment to the mental health core standards recommended by the Thriving at Work review (Stevenson-Farmer, 2017).

The policy establishes R&M's Employee Assistance Programme, describes the company's participation in recognised mental health at work initiatives, and provides a framework for identifying, assessing, and controlling occupational health hazards in the construction environment. It applies to all employees, workers, subcontractors, and any other person whose health may be affected by R&M's undertaking.

2. Scope

This policy applies to:

- All employees and workers of R&M Property Group Ltd, whether permanent, temporary, casual, or on probation.
- Agency workers, subcontractors, and their employees when working on R&M projects or under R&M's direction.
- Consultants, designers, and professional advisors visiting or working on R&M sites.

The policy covers both physical occupational health risks (noise, vibration, dust, manual handling, hazardous substances) and psychological health risks (stress, fatigue, bullying, isolation). It operates alongside and complements R&M's Health and Safety Policy, Mental Health & Wellbeing Policy (RM-MHW-001), Behavioural Safety Programme (RM-BSP-001), Drugs & Alcohol Policy (RM-DAP-001), and Anti-Bullying and Harassment Policy (RM-ABH-001).

3. Legal and Regulatory Framework

This policy supports R&M's compliance with:

- Health and Safety at Work etc. Act 1974 - general duty to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees (Section 2) and others (Section 3).
- Management of Health and Safety at Work Regulations 1999 - requirement for suitable and sufficient risk assessment including health risks, health surveillance where appropriate, and arrangements for competent health and safety assistance.
- Control of Substances Hazardous to Health Regulations 2002 (COSHH) - assessment and control of exposure to hazardous substances, including construction dust, solvents, and cement.
- Control of Noise at Work Regulations 2005 - assessment of noise exposure, provision of hearing protection, and health surveillance for noise-exposed workers.

- Control of Vibration at Work Regulations 2005 - assessment of hand-arm and whole-body vibration exposure, exposure limits, and health surveillance.
- Manual Handling Operations Regulations 1992 - assessment and reduction of manual handling risks.
- Control of Asbestos Regulations 2012 - management of asbestos-containing materials in refurbishment and demolition work.
- Construction (Design and Management) Regulations 2015 - principal contractor duties to plan, manage, and monitor health as well as safety (Regulation 13).
- Working Time Regulations 1998 - maximum working hours, rest periods, and night work limits relevant to fatigue management.
- Equality Act 2010 - duty to make reasonable adjustments for workers with disabilities, including mental health conditions.

The policy also implements the recommendations of the Thriving at Work: The Stevenson/Farmer Review of Mental Health and Employers (2017), commissioned by the UK Government, which sets out core and enhanced standards for employer action on mental health.

4. Policy Statement

R&M Property Group Ltd is committed to:

- Preventing work-related ill health by identifying, assessing, and controlling occupational health hazards before they cause harm.
- Promoting physical and mental wellbeing as integral to how R&M plans, manages, and delivers construction projects.
- Providing access to occupational health support, including an Employee Assistance Programme, for all employees.
- Implementing the six mental health core standards from the Thriving at Work review and working towards the enhanced standards over time.
- Participating actively in recognised mental health at work initiatives to drive continuous improvement and demonstrate public commitment.
- Supporting employees who develop health conditions - whether work-related or not - through early intervention, reasonable adjustments, and phased return to work.
- Monitoring occupational health data to identify trends, evaluate the effectiveness of controls, and target resources where they are most needed.
- Extending occupational health expectations to the supply chain through pre-qualification, subcontract terms, and site management.

5. Employee Assistance Programme (EAP)

5.1 Overview

R&M Property Group Ltd provides all employees with access to a confidential Employee Assistance Programme. The EAP is a professional support service available twenty-four hours a day, seven days a week, three hundred and sixty-five days a year. It is provided at no cost to employees and is entirely separate from R&M's management structure - all contact between an employee and the EAP provider is confidential.

5.2 Services Available

The EAP provides:

- Confidential telephone counselling - immediate access to trained counsellors for support with stress, anxiety, depression, bereavement, relationship difficulties, financial worries, and any other personal or work-related concern.
- Structured short-term counselling - where telephone support identifies a need for more in-depth help, the EAP arranges a course of face-to-face or video counselling sessions with a qualified therapist, typically up to six sessions per issue.
- Legal information - guidance on personal legal matters including employment rights, family law, housing, and consumer issues.
- Financial wellbeing support - guidance on debt management, budgeting, and signposting to specialist financial advice services.
- Manager support line - a dedicated line for managers seeking guidance on how to support a team member who may be struggling with a health or personal issue, without disclosing the individual's confidential information.
- Online resources - access to self-help materials, wellbeing assessments, and information on a wide range of health and lifestyle topics.

5.3 Confidentiality

The EAP operates under strict confidentiality. R&M does not receive any information about which employees have used the service or the nature of their contact. The only information R&M receives is anonymised, aggregated usage data (such as the total number of contacts per quarter and the broad categories of issues raised) for the purpose of monitoring the effectiveness of the programme and identifying trends that may require a workplace-level response. Individual employees will never be identified.

5.4 Promotion and Access

EAP details are communicated to all employees at induction, displayed in all office and site welfare facilities, included in the employee handbook, and promoted regularly through toolbox talks and internal communications. R&M ensures that all employees - including those on site who may not have regular access to email or intranet - are aware of the service and how to access it. The EAP contact details are also shared with subcontractor supervisors for onward communication to their workforce, recognising that subcontractor operatives on R&M sites face the same pressures and may benefit from signposting even if they are not directly eligible for R&M's EAP.

6. Implementation of Thriving at Work Core Standards

R&M Property Group Ltd has adopted the six mental health core standards recommended by the Thriving at Work review (Stevenson-Farmer, 2017). The following sets out how each standard is implemented within R&M's operations.

6.1 Core Standard 1 - Mental Health at Work Plan

Standard: Produce, implement and communicate a mental health at work plan that promotes good mental health of all employees and outlines the support available for those who may need it.

R&M's implementation:

- R&M has produced a comprehensive Mental Health & Wellbeing Policy (RM-MHW-001) which serves as the company's mental health at work plan. The policy sets out R&M's commitment, the support available, and the responsibilities of directors, managers, and employees.
- The plan is communicated to all employees at induction and is available on request. Key messages are reinforced through toolbox talks, site induction briefings, and welfare facility notices.
- The plan is reviewed annually and updated in response to changes in legislation, workforce feedback, or emerging best practice.
- The plan covers both the promotion of positive mental health (awareness, resilience, work-life balance) and the support available for employees experiencing mental ill health (EAP, MHFA, reasonable adjustments, phased return to work).

6.2 Core Standard 2 - Mental Health Awareness

Standard: Develop mental health awareness among employees by making information, tools and support accessible.

R&M's implementation:

- Mental health awareness information is included in the site induction for every person working on an R&M project. This covers common mental health conditions, how to recognise the signs in yourself and others, and how to access support.
- R&M has trained Mental Health First Aiders (MHFAs) within its workforce. MHFAs are identified by name on site notice boards and are available as a first point of contact for any worker who is struggling.
- Toolbox talks on mental health topics are delivered at least quarterly, covering subjects such as stress awareness, fatigue and its impact on safety, managing anxiety, bereavement, and financial wellbeing.
- R&M displays mental health awareness posters and helpline numbers (Lighthouse Construction Industry Charity, Samaritans, CALM, Mind) in all welfare facilities.
- Self-help resources and wellbeing assessments are available through the EAP online portal.

6.3 Core Standard 3 - Open Conversations

Standard: Encourage open conversations about mental health and the support available when employees are struggling, during the recruitment process and at regular intervals throughout employment.

R&M's implementation:

- R&M's recruitment process includes information about the company's commitment to mental health and the support available, ensuring that prospective employees know from the outset that mental health is taken seriously.
- Line managers are trained to hold regular one-to-one conversations with their direct reports that include a wellbeing check - not as a formal assessment but as part of normal, ongoing management dialogue.
- The Behavioural Safety Programme (RM-BSP-001) includes specific toolbox talk themes on speaking up, which extend beyond physical safety to include emotional wellbeing and the importance of asking for help.
- R&M promotes a culture where discussing mental health is normalised. The Director and senior management team lead by example, referencing mental health openly in team briefings and site visits.

- Workers who disclose a mental health condition are supported, not penalised. Disclosure is treated confidentially and triggers a supportive conversation about what adjustments or support may help, in accordance with the Equality Act 2010.

6.4 Core Standard 4 - Good Working Conditions

Standard: Provide employees with good working conditions and ensure they have a healthy work-life balance and opportunities for development.

R&M's implementation:

- R&M complies with the Working Time Regulations 1998, including maximum weekly working hours, daily and weekly rest periods, and annual leave entitlements. Excessive overtime is actively monitored and managed.
- Fatigue management is embedded in project planning. R&M assesses fatigue risk as part of the construction phase plan, particularly for work involving early starts, night shifts, long travel times, or physically demanding tasks. Where fatigue risk is identified, controls include adjusted shift patterns, additional rest breaks, task rotation, and welfare provision.
- Site welfare facilities meet or exceed the minimum standards set out in the CDM 2015 Regulations and Schedule 2, including clean and heated rest areas, adequate toilet and washing facilities, drinking water, drying rooms, and secure storage for personal belongings.
- R&M supports employee development through training opportunities, the SKEB competency framework (Skills, Knowledge, Experience, Behaviours), and access to the Supply Chain Sustainability School and CITB-funded courses.
- Flexible working arrangements are considered where practicable, recognising that work-life balance is a significant factor in mental health, particularly for employees with caring responsibilities or long commutes.

6.5 Core Standard 5 - Effective People Management

Standard: Promote effective people management through line managers and supervisors, including regular health and wellbeing conversations supported by appropriate training.

R&M's implementation:

- All line managers and supervisors receive training in mental health awareness, recognising the signs of mental ill health, and having supportive conversations. This training is delivered by Phillip Hollingworth, H&S Adviser (Spectra Safety), and is refreshed every two years.
- Managers are expected to conduct regular one-to-one check-ins with their team members that include an open question about wellbeing. These conversations are not recorded or reported - their purpose is to create a space where employees feel comfortable raising concerns.
- The manager support line within the EAP provides confidential guidance to managers on how to handle specific situations, such as supporting a team member through a mental health crisis, managing sickness absence related to mental health, or making reasonable adjustments.
- R&M's appraisal and performance management processes are designed to be supportive rather than punitive. Managers are trained to consider whether performance issues may be linked to health or personal difficulties and to offer support before taking formal action.

6.6 Core Standard 6 - Monitoring Employee Mental Health

Standard: Routinely monitor employee mental health and wellbeing by understanding available data, talking to employees regularly, and understanding risk factors.

R&M's implementation:

- R&M reviews anonymised EAP usage data quarterly to identify trends in the types of issues employees are seeking help with. Where trends emerge (for example, a rise in contacts related to financial stress), R&M considers whether a targeted workplace response is appropriate, such as a financial wellbeing toolbox talk or access to additional resources.
- Sickness absence data is monitored to identify patterns that may indicate work-related stress or mental health issues. Where a pattern is identified, the line manager conducts a supportive return-to-work conversation and, where appropriate, refers the employee to the EAP or occupational health.
- R&M conducts an annual anonymous employee wellbeing survey to assess the workforce's experience of working conditions, management support, work-life balance, and awareness of available support. Survey results are reviewed by the Director and used to inform the annual update of the mental health at work plan.
- Risk factors specific to construction - including the transient nature of the workforce, time pressure, physical demands, working away from home, and the male-dominated workforce profile - are explicitly considered in R&M's mental health risk assessment.
- Behavioural safety observation data from the Behavioural Safety Programme is reviewed for indicators of fatigue, distraction, or stress-related risk-taking, which may signal underlying health or wellbeing concerns.

7. Participation in Mental Health at Work Initiatives

R&M Property Group Ltd participates in and supports the following recognised mental health at work initiatives:

7.1 Lighthouse Construction Industry Charity

R&M is a supporter of the Lighthouse Construction Industry Charity (formerly the Lighthouse Club), which provides financial and emotional support to construction workers and their families. R&M promotes the Lighthouse helpline (0345 605 1956) on all sites, includes it in site inductions, and displays the helpline number in welfare facilities. R&M encourages employees and subcontractor operatives to contact the Lighthouse Charity for confidential support with financial hardship, emotional distress, wellbeing, and legal or family issues.

7.2 Mental Health First Aid (MHFA)

R&M has invested in MHFA England training for designated members of its workforce. Mental Health First Aiders are trained to recognise the signs and symptoms of common mental health conditions, provide initial support, and guide a person towards appropriate professional help. R&M's target is to maintain at least one trained MHFA for every project site, with their name and contact details displayed prominently. MHFAs receive refresher training every three years in accordance with MHFA England guidance.

7.3 Mates in Mind

R&M supports the Mates in Mind programme, a UK charity established to address mental health within the construction industry. Mates in Mind provides training, resources, and a framework

for companies to improve mental health awareness throughout their workforce and supply chain. R&M uses Mates in Mind resources in its toolbox talk programme and signposts employees and supply chain partners to the Mates in Mind website and helpline for information and support.

7.4 World Mental Health Day and Mental Health Awareness Week

R&M participates in national awareness campaigns including World Mental Health Day (October) and Mental Health Awareness Week (May). Activities include dedicated toolbox talks, distribution of awareness materials, promotion of the EAP and external helplines, and where possible, fundraising for mental health charities. These campaigns provide a regular, visible opportunity to reinforce the message that mental health matters at R&M.

7.5 Supply Chain Sustainability School

R&M is a partner of the Supply Chain Sustainability School, which provides free learning resources including modules on health, safety, and wellbeing. R&M encourages employees and supply chain partners to complete the wellbeing learning pathway, which covers mental health awareness, stress management, and building personal resilience.

8. Physical Occupational Health Management

In addition to mental health, R&M manages the following physical occupational health risks specific to the construction environment:

8.1 Noise

Noise exposure is assessed for all tasks with the potential to exceed the lower exposure action value (80 dB(A) daily or weekly average). Where noise risks are identified, R&M implements the hierarchy of control: elimination, substitution of quieter equipment, engineering controls (enclosures, barriers), administrative controls (job rotation, time limiting), and hearing protection as a last resort. Health surveillance (audiometry) is provided for workers regularly exposed above the upper exposure action values.

8.2 Hand-Arm Vibration (HAVS)

R&M assesses hand-arm vibration exposure for all operatives using vibrating tools and equipment. Exposure is managed against the exposure action value (2.5 m/s^2) and exposure limit value (5 m/s^2) through tool selection, maintenance, task rotation, and time limiting. Health surveillance is provided for at-risk workers, including a baseline assessment and regular follow-up using the tiered approach recommended by HSE guidance L140.

8.3 Construction Dust and Respiratory Health

R&M implements dust controls in accordance with HSE guidance on construction dust (silica, wood, and general construction dust). Controls include on-tool extraction, water suppression, use of appropriate RPE, task-specific COSHH assessments, and face-fit testing for RPE users. Health surveillance (lung function testing) is provided for workers regularly exposed to respiratory hazards.

8.4 Manual Handling and Musculoskeletal Disorders

Manual handling risks are assessed for all tasks involving lifting, carrying, pushing, pulling, or repetitive movement. R&M applies the hierarchy of control: elimination of manual handling

where practicable, use of mechanical aids, redesign of tasks, and training. Where manual handling cannot be avoided, task-specific assessments are conducted and controls implemented. Workers reporting musculoskeletal symptoms are supported through early referral to occupational health and, where appropriate, temporary redeployment or adjusted duties.

8.5 Hazardous Substances

COSHH assessments are completed for all hazardous substances used or generated on R&M projects, including cement, resins, adhesives, solvents, lead paint (in refurbishment), and asbestos-containing materials. Controls follow the hierarchy: elimination, substitution, engineering controls, administrative controls, and PPE. Health surveillance is provided where required by the substance-specific COSHH assessment.

8.6 Fatigue Management

R&M recognises fatigue as a significant occupational health and safety risk in construction. Fatigue increases the likelihood of errors, slowed reaction times, poor decision-making, and at-risk behaviours. R&M manages fatigue through:

- Compliance with Working Time Regulations, including maximum average working week of 48 hours (unless an individual opt-out is in place and regularly reviewed), minimum daily rest of 11 consecutive hours, and minimum weekly rest of 24 consecutive hours.
- Fatigue risk assessment as part of the construction phase plan, considering shift length, start and finish times, travel time, physical demands, environmental conditions, and cumulative fatigue over extended programmes.
- Monitoring of actual hours worked, with intervention where individuals or teams are consistently working excessive hours.
- Inclusion of fatigue as a specific topic in the Behavioural Safety Programme - observers are trained to recognise signs of fatigue (yawning, loss of concentration, slower reaction times) and to initiate a supportive conversation.
- Provision of adequate rest facilities on site, including a quiet area separate from the main canteen where possible.

9. Health Surveillance

R&M provides health surveillance for employees and workers exposed to specific occupational health hazards, in accordance with the relevant regulations and HSE guidance. Health surveillance is not a substitute for controlling exposure - it is an additional safeguard to detect early signs of work-related ill health so that exposure can be reviewed and, where necessary, further reduced.

Health surveillance programmes are determined by the risk assessment and may include:

- Audiometry (hearing tests) for noise-exposed workers.
- HAVS screening (tiered questionnaire and clinical assessment) for vibration-exposed workers.
- Lung function testing (spirometry) for workers exposed to respiratory hazards.
- Skin checks for workers exposed to cement, resins, or other dermal sensitisers.
- Baseline and periodic health assessments for workers in safety-critical roles.

Health surveillance is delivered by a competent occupational health provider appointed by R&M. Results are confidential to the individual and the occupational health provider. R&M

receives only a fitness-for-task assessment (fit, fit with restrictions, or unfit) - not the clinical details of any diagnosis. Where health surveillance identifies an abnormality, the individual is referred for further investigation and the workplace exposure is reviewed to determine whether additional controls are needed.

10. Sickness Absence and Return to Work

10.1 Supportive Approach

R&M takes a supportive approach to sickness absence, whether related to physical health, mental health, or a combination of both. The aim is to support employees in returning to work as soon as they are able, while ensuring that the return is safe, sustainable, and does not exacerbate the condition.

10.2 Return-to-Work Conversations

A return-to-work conversation is held with every employee returning from sickness absence, regardless of the length or reason for absence. The conversation is supportive, not disciplinary, and covers:

- How the employee is feeling and whether they are ready to return to full duties.
- Whether any reasonable adjustments or temporary modifications to duties are needed.
- Whether the absence was related to any workplace factor that needs to be addressed.
- What ongoing support is available, including the EAP, occupational health referral, and MHFA.

10.3 Reasonable Adjustments

R&M makes reasonable adjustments for employees with a disability or long-term health condition, including mental health conditions, in accordance with the Equality Act 2010. Adjustments may include modified hours, phased return to work, temporary redeployment to lighter duties, additional rest breaks, changes to the working environment, or provision of specialist equipment. Adjustments are discussed with the employee and, where appropriate, informed by occupational health advice.

10.4 Occupational Health Referral

Where an employee's absence is prolonged, recurrent, or related to a condition that may be affected by their work, R&M may refer the employee to its occupational health provider for an assessment. The purpose of the referral is to obtain professional advice on the employee's fitness for work, any adjustments that may help, and whether the condition is work-related. Referrals are made with the employee's knowledge and consent.

11. Supply Chain Occupational Health Expectations

R&M expects its supply chain partners to manage occupational health risks to the same standard as R&M itself. Specifically:

- Subcontractors must comply with all relevant occupational health legislation, including COSHH, noise, vibration, and manual handling regulations.

- Subcontractors must provide health surveillance for their operatives where required by the risk assessment (for example, audiometry for noise-exposed workers, HAVS screening for vibration-exposed workers).
- Subcontractors must cooperate with R&M's occupational health monitoring on site, including dust monitoring, noise assessments, and welfare inspections.
- Subcontractors are encouraged to provide their operatives with access to an EAP or equivalent support service. Where subcontractor operatives do not have access to an EAP, R&M signposts them to the Lighthouse Charity helpline, Samaritans, and other free support services.
- Subcontractors must not penalise operatives for reporting occupational health symptoms or for attending health surveillance appointments.

12. Responsibilities

Thomas McKenna, Director:

- Overall accountability for occupational health policy and its resourcing.
- Board-level health and wellbeing lead in accordance with Thriving at Work enhanced standard.
- Ensures the EAP is funded, communicated, and reviewed annually.
- Approves the annual mental health at work plan and occupational health arrangements.

Jon Scurr, Director of Operations:

- Ensures occupational health risks are identified and controlled on all projects.
- Monitors fatigue risk through project planning and working hours review.
- Ensures supply chain compliance with occupational health requirements.

Phillip Hollingworth, H&S Adviser (Spectra Safety):

- Manages the health surveillance programme and occupational health provider relationship.
- Delivers mental health awareness and manager training.
- Reviews EAP usage data and sickness absence trends quarterly.
- Coordinates participation in mental health at work initiatives and awareness campaigns.
- Advises on reasonable adjustments and return-to-work arrangements.

Site Managers and Supervisors:

- Ensure occupational health controls are implemented on site (dust suppression, hearing protection, vibration management, welfare provision).
- Conduct return-to-work conversations and escalate concerns to the Compliance Officer.
- Promote the EAP and mental health support services through toolbox talks and site communications.
- Monitor for signs of fatigue, stress, or ill health among their teams and respond supportively.

Mental Health First Aiders:

- Act as a first point of contact for any worker experiencing mental health difficulties.
- Provide initial support and signpost to appropriate professional help (EAP, GP, crisis services).
- Maintain their training currency through refresher courses every three years.

All Employees and Workers:

- Cooperate with occupational health arrangements, including attending health surveillance appointments and following control measures.
- Report any occupational health symptoms (hearing loss, skin irritation, respiratory symptoms, musculoskeletal pain) to their supervisor or the Compliance Officer.
- Look out for colleagues and raise concerns about a colleague's wellbeing through the appropriate channels.

13. Working Towards Thriving at Work Enhanced Standards

While the Thriving at Work enhanced standards are primarily directed at larger employers and public sector organisations, R&M is committed to progressing towards them as the company grows. Current progress includes:

- **Transparency and reporting:** R&M reports on mental health and wellbeing activity through its annual ESG reporting and social value returns to framework clients.
- **Board-level lead:** Thomas McKenna, Director, acts as the board-level health and wellbeing lead with personal accountability for mental health at work.
- **Disclosure support:** R&M's recruitment and employment processes encourage openness about mental health conditions and ensure that disclosure triggers support, not disadvantage.
- **Tailored support:** The EAP provides structured counselling, and R&M signposts to NHS and specialist services where clinical support is needed beyond the scope of the EAP.

14. Related Documents

- Mental Health & Wellbeing Policy (RM-MHW-001)
- Behavioural Safety Programme (RM-BSP-001)
- Drugs & Alcohol Policy (RM-DAP-001)
- Anti-Bullying and Harassment Policy (RM-ABH-001)
- Prevention of Sexual Harassment Policy (RM-PSH-001)
- Fairness, Inclusion and Respect Policy (RM-FIR-001)
- Whistleblowing Policy (RM-WBP-001)
- Health and Safety Policy
- Data Protection Policy and Privacy Notice (RM-DPP-001)

15. Policy Review

This policy is reviewed annually by the Director and the Compliance Officer, or sooner if there is a change in relevant legislation, a significant occupational health incident, or a material change in the company's operations. All changes are approved by the Director.

Signed and Approved:

Thomas McKenna

Director, R&M Property Group Ltd

Date: June 2026