



INTEGRATED MANAGEMENT SYSTEM (IMS) POLICY 2026

Concept Management Group Ltd

Our commitment to a safe, compliant and sustainable future through integrated management, operational excellence and continual improvement.

NATIONWIDE
COVERAGE



LOCAL
PEOPLE
NATIONAL
SOLUTIONS

MANAGE | MAINTAIN | IMPROVE | TOGETHER

CLICK ANY CATEGORY BELOW TO OPEN THAT SECTION

DOCUMENT REFERENCE	VERSION	ISSUE DATE	REVIEW DATE
IMS-POL-001	1.0	09/02/2026	09/02/2027
DOCUMENT OWNER			
Managing Director – Daryl Lorenzini			



PEOPLE



QUALITY



ENVIRONMENT



HEALTH & SAFETY



COMMUNITY



CONTINUAL
IMPROVEMENT



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MANDATORY - COMPLETE BOTH BEFORE MOBILISATION

MANDATORY - MAIN DECLARATION

MANDATORY - OPERATIVE PQQ & SIGN-OFF

CLICK ANY BLUE CATEGORY BELOW TO OPEN THAT SECTION

HEALTH & SAFETY

RISK / RAMS / COSHH

PEOPLE & COMPETENCE

ENVIRONMENT

INCIDENTS & EMERGENCY

MONITORING & GOVERNANCE



INTEGRATED MANAGEMENT SYSTEM (IMS)

This Declaration is made in favour of:

Concept Management Group Ltd

Company Number 14084549
Trading as "Concept Management Group"
(Hereafter referred to as "the Company")

1. Acknowledgement of Legal Entity

I acknowledge that the contracting legal entity is Concept Management Group Ltd (Company Number 14084549). I understand that "Concept Management Group" is a trading name only and does not constitute a separate legal entity. I confirm that all contractual, statutory, and legal obligations arise solely under Concept Management Group Ltd.

2. Confirmation of Full Review

I confirm that I have been provided with access to the Company's Integrated Management System (IMS) in full. I confirm that I have read the document in its entirety and understand that it forms part of the contractual and operational framework governing my engagement.

I acknowledge that the IMS includes, but is not limited to:

- Health & Safety Management Systems
- CDM 2015 Duties
- Risk Assessment & Method Statement Requirements
- Environmental Governance
- Permit to Work Systems
- Competence & Training Requirements
- Workforce Conduct & Ethics
- Anti-Bribery & Modern Slavery Compliance
- Data Protection Obligations
- Incident Reporting Requirements
- Enforcement & Indemnity Provisions

I understand that this document operates as a binding governance framework.

3. Acceptance of Personal and Contractual Responsibility

I expressly agree:

- To comply fully with all sections of the IMS.
- To follow all lawful instructions issued by Company management.
- To prepare and adhere to suitable and sufficient risk assessments and method statements where required.
- To ensure all works under my control are carried out safely and lawfully.
- To immediately report hazards, incidents, breaches, or unsafe conditions.
- To cooperate fully with investigations or audits.
- To maintain valid certification and competence at all times.

I acknowledge that ignorance of the contents of the IMS shall not constitute a defence in the event of breach, removal, enforcement action, or contractual dispute.

4. Indemnity and Liability Position

I acknowledge that I remain responsible for the safe planning, management, and execution of works under my control.



- Losses arising from my negligence.
- Fines or enforcement action attributable to my acts or omissions.
- Third-party claims resulting from breach of statutory duty.
- Costs associated with remedial works caused by non-compliance.
- Legal costs incurred due to my breach of this IMS.

I acknowledge that approval of documentation by the Company does not transfer liability for the adequacy or execution of my work.

5. Right of Removal and Termination

I acknowledge and accept that the Company retains absolute discretion to:

- Suspend work.
- Remove individuals from site.
- Terminate engagement.
- Recover financial losses.
- Report serious breaches to regulatory authorities.

Such actions may be taken without compensation where breach of this IMS occurs.

6. Declaration of Competence

I confirm that:

- I am competent within the meaning of CDM 2015.
- I hold valid certification relevant to my trade and tasks.
- I am legally entitled to work in the United Kingdom.
- I carry appropriate insurance where required.
- I will notify the Company immediately if any certification, insurance, or legal status changes.

7. Binding Agreement

By signing below, I confirm that:

- I have read and understood the Integrated Management System in its entirety.
- I accept that it forms part of the contractual framework governing my engagement.
- I agree to comply fully with all provisions.
- I accept personal accountability for compliance.
- I understand that failure to comply may result in removal, termination, financial recovery, or legal proceedings.

This declaration shall remain valid for the duration of my engagement with Concept Management Group Ltd unless replaced by a revised version issued by the Company.

SIGNATORY DETAILS

➡	Full Name:	
➡	Company Name (if applicable):	
➡	Company Registration Number (if applicable):	
➡	Address:	
➡	Position/Trade:	
	Signature:	
➡	Date:	



	Position:	
		
	Signature:	
	Date:	



Concept Management Group Ltd, registered in England and Wales under Company Number 14084549, is the sole legal entity responsible for the operations conducted under its registered name and under its commonly used trading description "Concept Management Group". The use of the trading name "Concept Management Group" is adopted for commercial and operational convenience only and does not constitute a separate legal entity, partnership, joint venture, or associated corporate body. All contractual engagements, statutory obligations, liabilities, and regulatory duties arise exclusively under Concept Management Group Ltd. Any reference within this Integrated Management System to "Concept Management Group", "the Company", or similar abbreviated terminology shall be interpreted as referring solely to Concept Management Group Ltd unless expressly stated otherwise in a formal written agreement executed by a Director of the Company.

This Integrated Management System ("IMS") is issued under the authority of the Directors of Concept Management Group Ltd and represents the Company's consolidated governance framework for all operational, statutory, and contractual activities. The purpose of this IMS is to establish a structured, legally aligned, and enforceable system of control that governs health and safety management, environmental compliance, workforce conduct, statutory obligations, and Subcontractors, Labour only, Self-Employed, engagement. It is intended to operate as a comprehensive reference document, consolidating all core operational policies within a single authoritative framework. This document shall be read as a whole and interpreted in conjunction with project-specific documentation where applicable.

The Directors acknowledge their responsibilities under the Health and Safety at Work etc. Act 1974 and associated regulations and confirm that adequate systems of management, competent persons, and appropriate resources shall be provided to ensure compliance so far as is reasonably practicable. Strategic oversight remains with the Directors; however, operational implementation is delegated to appointed managers and supervisors who are deemed competent by virtue of training, experience, and qualifications. Nothing within this IMS shall be interpreted as imposing personal liability upon a Director where due diligence, reasonable oversight, and proper delegation have been exercised in accordance with corporate governance principles.

This IMS applies without exception to all individuals engaged by the Company, including but not limited to employees, agency workers, Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, , Labour only, Self-Employed, , Labour only, Self-Employed, , labour-only operatives, self-employed persons, consultants, and suppliers attending sites under the Company's control. Compliance with this IMS is a condition of engagement, site access, and continued commercial relationship. The Company reserves the absolute right to suspend works, remove individuals from site, terminate agreements, and recover financial losses arising from non-compliance with the provisions contained herein.

This document shall be reviewed periodically and may be amended at the discretion of the Directors to reflect legislative change, industry best practice, contractual requirements, or operational development. The most current version shall prevail. Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, , Labour only, Self-Employed, ++Labour only, Self-Employed, and signatories shall be deemed bound by the current version in force at the time of their engagement.

By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they have read this section in its entirety, understand its contents, acknowledge the legal identity of the contracting entity, and accept that compliance with this document is mandatory and enforceable.

References



SECTION 2 - HEALTH AND SAFETY MANAGEMENT SYSTEM

Concept Management Group Ltd, trading as Concept Management Group, recognises that the effective management of health and safety is a statutory obligation imposed under the Health and Safety at Work etc. Act 1974 and associated regulations and further acknowledges that facilities management, landscaping, cleaning, property maintenance and M&E activities carry inherent risks which must be managed through structured governance, competent supervision, and enforceable systems of control. The Company therefore establishes this Health and Safety Management System as a formal mechanism through which its duties are discharged, risks are identified and controlled, and legal compliance is demonstrably achieved. The Directors of the Company accept their responsibility to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees and all other persons who may be affected by the Company's undertakings. This responsibility is exercised through the provision of adequate financial resources, appointment of competent persons, establishment of safe systems of work, and implementation of monitoring procedures. The Directors shall retain strategic oversight of health and safety performance but shall delegate operational implementation to appointed managers and supervisors. Such delegation shall not be construed as abdication of responsibility but as a structured and lawful distribution of operational control in accordance with recognised corporate governance principles. Directors shall not incur personal liability for operational failings where reasonable systems, supervision, and due diligence have been established and maintained.

The Company operates a risk-based approach to health and safety management. All work activities are subject to systematic hazard identification and risk assessment prior to commencement. Risk assessments shall identify foreseeable hazards arising from facilities management, landscaping and grounds maintenance, commercial cleaning, property maintenance, M&E services, plant and equipment use, work at height, manual handling, confined spaces, hazardous substances, electrical works, and any ancillary activities. Control measures shall be determined in accordance with the hierarchy of control principles, prioritising elimination of risk where practicable, followed by substitution, engineering controls, administrative controls, and finally personal protective equipment. No work shall commence until risks have been assessed and control measures communicated to those undertaking the work. Operationally, the Company requires that all site activities are undertaken in accordance with project-specific risk assessments and method statements. These documents form the operational extension of this Management System and shall be prepared by competent persons with sufficient knowledge of the tasks involved. Supervisors are responsible for ensuring that works are executed strictly in accordance with those documented controls. Any deviation must be authorised in writing following reassessment of risk. Unauthorised deviation shall constitute a serious breach of Company policy and may result in immediate removal from site.

The Company acknowledges its duties under the Management of Health and Safety at Work Regulations 1999 to appoint competent assistance for health and safety matters. Where necessary, external advisors may be retained to support compliance. However, reliance upon external advisors shall not relieve Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, Labour only, Self-Employed, Labour only, Self-Employed, or individual workers of their personal duties under Section 7 of the Health and Safety at Work etc. Act 1974. Every individual engaged by the Company has a personal obligation to take reasonable care of their own health and safety and that of others who may be affected by their acts or omissions. Competence is regarded as fundamental to risk control. The Company shall verify qualifications, training records, and experience prior to engagement where reasonably practicable. Supervisory personnel must demonstrate suitable knowledge of construction safety management. Operatives must hold relevant trade and safety certifications where industry standards require. The Company reserves the right to suspend or remove any individual whose competence is reasonably called into question.

Monitoring and enforcement form a central component of this Management System. Site inspections shall be undertaken periodically to verify compliance with safe systems of work. Where unsafe conditions are identified, the Company retains the unequivocal authority to stop work immediately. Corrective actions shall be recorded and followed through to completion. Repeated non-compliance may result in termination of engagement and recovery of costs incurred as a result of remedial action, delay, enforcement intervention, or third-party claims. Accident and incident reporting shall be undertaken in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). All accidents, near misses, and unsafe occurrences must be reported immediately to supervision. Failure to report may be treated as misconduct. The Company shall investigate incidents proportionately and implement corrective measures to prevent recurrence. Where statutory reporting thresholds are met, reports shall be submitted to the Health and Safety Executive. The Company shall ensure that welfare facilities meeting the requirements of Schedule 2 of the Construction (Design and Management) Regulations 2015 are available where it controls the site. Where acting as Subcontractors, Labour only, Self-Employed, the Company shall verify that welfare arrangements provided by the Principal Contractor are adequate before commencing work. Work shall not proceed where welfare standards are grossly deficient.

Nothing within this Health and Safety Management System shall be interpreted as transferring liability from Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, Labour only, Self-Employed, Labour only, Self-Employed, for risks arising from their specialist activities. Each Subcontractors, Labour only, Self-Employed, remains responsible for planning, managing, and executing their work safely and in compliance with statutory duties. The Company reserves its contractual right to seek indemnification where breaches by Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, Labour only, Self-Employed, Labour only, Self-Employed, expose the Company to regulatory action, financial loss, or reputational damage. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they have read this Health and Safety Management System in its entirety, understand the legal obligations imposed upon them, accept personal accountability for compliance, and agree to adhere fully to its provisions. The signatory further acknowledges that ignorance of the contents of this document shall not constitute a defence in the event of enforcement, removal from site, or contractual termination. Concept Management Group Ltd, trading as Concept Management Group, recognises that effective health and safety management is not a static obligation but a dynamic and continuous governance function.



requiring leadership, competence, accountability, and structured review. The Company affirms that compliance with statutory requirements represents the minimum standard expected; the objective of this Health and Safety Management System is to exceed minimum compliance and embed risk management as an operational discipline across all levels of the organisation.

2.1 Governance and Leadership Commitment

The Directors formally endorse this Health and Safety Management System as the central framework governing operational risk control. Leadership commitment is demonstrated through:

- Visible and active participation in health and safety matters.
- Allocation of sufficient financial and human resources.
- Periodic review of safety performance indicators.
- Review of enforcement notices, audit findings, and incident trends.
- Integration of safety considerations into commercial and operational decision-making.

Health and safety performance shall be treated as a key performance indicator equal in importance to quality, programme delivery, and financial management. No commercial objective shall take precedence over statutory compliance or the protection of persons. The Directors shall conduct periodic strategic reviews of this Management System to ensure ongoing suitability, adequacy, and effectiveness. Such reviews shall consider legislative changes, industry developments, enforcement trends, incident data, and operational feedback.

2.2 Organisational Structure and Defined Responsibilities

A clearly defined organisational structure shall support this Management System. Roles and responsibilities shall be documented and communicated, including:

- Director-level strategic oversight.
- Senior management implementation duties.
- Site supervisory control and monitoring.
- Employee and subcontractor compliance obligations.

Delegation of operational responsibilities shall be accompanied by appropriate authority, competence, and resource allocation. Supervisors shall be empowered to stop work where safety is compromised without requiring prior approval from senior management. Lines of communication shall be established to ensure that safety concerns, incidents, and regulatory matters are escalated promptly to appropriate decision-makers.

2.3 Planning and Risk Management

The Company's risk-based approach shall follow a structured cycle of:

1. Hazard identification.
2. Risk evaluation.
3. Implementation of control measures.
4. Communication of controls.
5. Monitoring and review.

Risk assessments shall be reviewed:

- Prior to commencement of new projects.
- Following material changes in scope or method.
- After incidents or near misses.
- Where legislative updates affect control measures.
- At defined periodic intervals appropriate to risk exposure.

Particular attention shall be given to interface risks arising from multi-trade environments, including coordination with Principal Contractors, mechanical and electrical contractors, and fire protection specialists. Where residual risk remains after implementation of controls, supervision levels shall be increased proportionately.

2.4 Safe Systems of Work and Methodology Control

Method statements shall clearly describe:



- The sequence of operations;
- Equipment and materials required;
- Identified hazards and corresponding controls;
- Emergency arrangements;
- Environmental protection measures;
- Competency requirements.

Briefings shall be delivered prior to commencement of work, and personnel shall confirm understanding. Records of briefings shall be retained. The Company adopts a strict non-deviation principle. Where operational conditions change, works must pause pending reassessment. Dynamic risk assessment may supplement formal documentation but shall not replace it where significant hazards are present.

2.5 Competence, Training and Supervision

Competence shall be assessed on the basis of:

- Relevant qualifications and trade certifications.
- Industry-recognised training (e.g., CSCS, SMSTS, SSSTS where applicable).
- Demonstrable experience.
- Knowledge of statutory duties.
- Behavioural safety awareness.

Where competence gaps are identified, training shall be provided or engagement declined. The Company reserves absolute discretion to remove individuals whose conduct, knowledge, or performance presents unacceptable risk. Supervision shall be proportionate to:

- Experience of personnel;
- Complexity of works;
- Risk exposure;
- Previous performance history.

Young or inexperienced workers shall receive enhanced supervision.

2.6 Communication and Worker Involvement

The Company shall encourage open communication regarding safety matters. Workers shall be consulted on risk assessments and procedural changes where appropriate. Safety briefings, toolbox talks, and induction processes form an integral part of system implementation. Concerns raised in good faith shall be investigated without prejudice. Retaliation for raising safety concerns is prohibited.

2.7 Performance Measurement and Continuous Improvement

The effectiveness of this Management System shall be evaluated through:

- Site inspections and compliance audits;
- Incident frequency and severity analysis;
- Near miss reporting trends;
- Feedback from clients and Principal Contractors;
- Review of enforcement actions and insurer recommendations.

Performance data shall inform corrective and preventative action planning. Lessons learned shall be disseminated across projects to prevent recurrence. Continuous improvement shall be achieved through periodic revision of policies, procedures, and training programmes in light of operational experience and regulatory developments.

2.8 Documentation and Record Control

Health and safety documentation shall be controlled to ensure accuracy, currency, and accessibility. Superseded documents shall be withdrawn from circulation. Electronic and hard-copy records shall be retained in accordance with statutory retention requirements.

Records may include:

- Risk assessments and method statements;



- Inspection reports;
- Training records;
- Incident investigation reports;
- Audit findings;
- Permit documentation;
- Consultation records.

Document control supports evidential compliance in the event of regulatory scrutiny or civil proceedings.

2.9 Emergency Preparedness and Interface Management

Emergency arrangements shall be integrated into project planning. Where acting as subcontractor, the Company shall formally review the Principal Contractor's Construction Phase Plan to ensure clarity of emergency protocols and welfare standards. The Company shall not commence works where emergency planning or welfare arrangements are demonstrably inadequate.

2.10 Subcontractor Management and Commercial Protection

Subcontractor selection shall consider safety competence, performance history, and certification. Subcontractors shall provide evidence of:

- Risk assessments and method statements.
- Insurance cover.
- Training and competency records.
- Regulatory compliance history.

The Company shall retain the right to monitor subcontractor performance and intervene where standards fall below acceptable levels. No provision within this Management System shall transfer statutory duty or dilute specialist responsibility. Each subcontractor remains directly accountable for safe planning and execution of their works.

2.11 Legal Compliance and Due Diligence

The Company shall monitor legislative developments relevant to facilities management, landscaping, commercial cleaning, building maintenance, electrical and M&E works. Policies and procedures shall be updated where necessary to maintain compliance. Directors shall demonstrate due diligence through:

- Implementation of structured systems.
- Appointment of competent persons.
- Monitoring and review processes.
- Prompt action upon identification of risk.

Where such systems are reasonably established and maintained, operational failings shall be assessed in accordance with statutory principles governing corporate and individual liability. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they:

- Have read and understood this Health and Safety Management System in full.
- Accept personal and organisational responsibility for compliance.
- Agree to operate strictly within documented controls.
- Acknowledge that failure to comply may result in removal from site, contractual termination, or recovery of associated losses.

Ignorance of the contents of this document shall not constitute a defence.

References

1. Health and Safety at Work etc. Act 1974 – <https://www.legislation.gov.uk/ukpga/1974/37>
2. Management of Health and Safety at Work Regulations 1999 – <https://www.legislation.gov.uk/uksi/1999/3242>
3. Construction (Design and Management) Regulations 2015 – <https://www.legislation.gov.uk/uksi/2015/51>
4. RIDDOR Regulations 2013 – <https://www.legislation.gov.uk/uksi/2013/1471>
5. HSE Construction Guidance – <https://www.hse.gov.uk/construction>



SECTION 3 - RISK ASSESSMENT, METHOD STATEMENTS AND OPERATIONAL CONTROL FRAMEWORK

Concept Management Group Ltd, trading as Concept Management Group, recognises that the systematic identification, assessment, and control of risk forms the foundation of lawful construction management. The Company acknowledges its statutory duties under the Management of Health and Safety at Work Regulations 1999 to make suitable and sufficient assessments of risks to employees and to persons not in its employment arising out of or in connection with its undertaking. Accordingly, the Company establishes this Risk Assessment and Operational Control Framework as a formalised mechanism through which hazards are identified, risks are evaluated, and proportionate control measures are implemented and enforced. All work undertaken by or on behalf of the Company shall be subject to prior risk assessment. Risk assessment shall be undertaken by competent persons possessing appropriate knowledge of the task, environment, equipment, and foreseeable hazards. Assessments shall consider routine operations, non-routine activities, foreseeable emergencies, interaction with other trades, and environmental conditions. The assessment process shall evaluate the likelihood of harm and the severity of potential consequences and shall determine control measures in accordance with the established hierarchy of control principles.

Where the nature of works involves multiple hazards or coordination with other contractors, a detailed Method Statement shall accompany the risk assessment. The Method Statement shall describe the sequence of operations, equipment to be used, personnel requirements, supervision arrangements, emergency procedures, and specific risk controls to be applied. Method Statements shall not be generic in nature; they must be project-specific and task-specific, reflecting the actual conditions under which the work is to be undertaken. Supervisors are responsible for ensuring that all operatives understand and adhere to the prescribed safe system of work. The Company strictly prohibits deviation from approved risk assessments and method statements without formal review and authorisation. Where site conditions materially change, or unforeseen hazards arise, works shall cease until reassessment has been undertaken and revised documentation issued. Any individual who knowingly proceeds outside of approved control measures shall be deemed to have committed a serious breach of Company policy and may be subject to immediate removal and contractual termination.

The Company further acknowledges its duties under the Control of Substances Hazardous to Health Regulations to assess and control risks arising from exposure to hazardous substances. Where materials and substances such as cleaning chemicals, fuels, oils, adhesives, sealants, paints, treatment products, dusts and aerosols, or any potentially harmful substances are used, COSHH assessments shall be completed, and appropriate control measures implemented. Safety Data Sheets shall be obtained and retained as supporting documentation. Exposure monitoring shall be conducted where necessary to ensure compliance with Workplace Exposure Limits. High-risk activities, including but not limited to work at height, confined spaces, hot works, lifting operations, and work involving live services, shall require enhanced planning and, where applicable, a Permit to Work system. Permit systems shall be implemented to ensure that such activities are authorised, controlled, and monitored. Permits shall specify the scope of work, hazards identified, control measures, duration of validity, and responsible persons. Failure to comply with permit conditions shall result in immediate suspension of works.

The Company maintains that Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, , Labour only, Self-Employed, , Labour only, Self-Employed, retain primary responsibility for the safe execution of their specialist activities. The approval of risk assessments or method statements by the Company does not transfer liability for the adequacy of those documents. Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, , Labour only, Self-Employed, , Labour only, Self-Employed, warrant that documentation submitted is suitable and sufficient for the works described. The Company reserves the right to require amendments where deficiencies are identified but shall not assume design or technical responsibility for specialist systems unless expressly agreed in writing. Document control forms a critical part of this framework. All risk assessments and method statements shall be dated, version controlled, and retained for an appropriate period. Superseded documents shall be clearly marked to prevent inadvertent use. Records shall be made available for inspection by Clients, Principal Contractors, insurers, or regulatory authorities as required.

The Company's enforcement authority within this framework is absolute. Works may be stopped without notice where unsafe conditions are observed. The Company may impose additional controls where reasonably necessary to mitigate risk. Any costs arising from non-compliance, including delay, remedial works, enforcement notices, or penalties, may be recovered from the responsible party. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they have read this Risk Assessment and Operational Control Framework in its entirety, understand their duties to prepare and adhere to suitable and sufficient documentation, and accept personal and contractual accountability for compliance. The signatory acknowledges that deviation from approved safe systems of work may result in removal, termination, financial recovery, and potential reporting to regulatory authorities.

References

1. Management of Health and Safety at Work Regulations 1999 – <https://www.legislation.gov.uk/uksi/1999/3242>
2. Control of Substances Hazardous to Health Regulations – <https://www.hse.gov.uk/coshh>
3. Work at Height Regulations 2005 – <https://www.legislation.gov.uk/uksi/2005/735>
4. Provision and Use of Work Equipment Regulations 1998 – <https://www.legislation.gov.uk/uksi/1998/2306>
5. HSE Risk Assessment Guidance – <https://www.hse.gov.uk/simple-health-safety/risk>



SECTION 4 - SUBCONTRACTORS, LABOUR ONLY, SELF-EMPLOYED, MANAGEMENT, CONTROL AND INDEMNITY POSITION

Concept Management Group Ltd recognises that the engagement of subcontractors, labour-only personnel and self-employed operatives must be managed with precision to ensure statutory compliance, commercial protection, and clarity of responsibility. This framework is designed to align with established contractual risk allocation principles commonly reflected in JCT and NEC forms of contract, whilst also preserving the independent status of those engaged on a labour-only or self-employed basis. All subcontractors and self-employed operatives engaged by the Company shall be appointed on the basis that they are independent contractors responsible for the safe planning, management and execution of the works placed under their control. Nothing within this Integrated Management System, nor within any engagement or order, shall be interpreted as creating a contract of employment, partnership, joint venture, or agency relationship. Labour-only and self-employed individuals remain responsible for their own tax, national insurance, statutory obligations, insurances where required, and compliance with all applicable legislation. Prior to engagement, the Company shall undertake proportionate due diligence to verify competence, capability and financial standing. This may include assessment of qualifications, training certification, industry accreditations, trade competence, health and safety documentation, references, and insurance arrangements. The Company reserves the right to withhold appointment or suspend mobilisation where satisfactory evidence of competence or compliance is not provided.

In accordance with the allocation of risk principles typically reflected within JCT and NEC contracts, responsibility for workmanship, supervision, safe systems of work, and statutory compliance shall remain with the subcontractor or self-employed operative in respect of the works they undertake. The Company's review, approval or comment upon risk assessments, method statements or other documentation shall not relieve the subcontractor of responsibility for accuracy, adequacy, or compliance. Such review is undertaken for coordination and risk management purposes only and does not transfer liability. Where Concept Management Group Ltd is engaged under a JCT or NEC form of contract, subcontractors and labour-only operatives shall comply with all upstream contractual obligations insofar as they relate to the works being undertaken. This includes adherence to programme requirements, quality standards, health and safety provisions, environmental controls, and cooperation duties. Subcontractors shall not take any action that would place the Company in breach of its obligations under the main contract.

Labour-only and self-employed operatives working under the direction of the Company must comply fully with site rules, Construction Phase Plans, risk assessments and method statements. However, compliance with supervision and instruction does not negate their independent duty under Section 7 of the Health and Safety at Work etc. Act 1974 to take reasonable care for their own safety and that of others. Everyone remains legally accountable for negligent acts or omissions. The Company reserves the right to intervene, suspend works, or remove individuals from site where competence, conduct, or compliance is reasonably called into question. Such action may be taken without liability for consequential delay or loss where the suspension arises from breach, negligence, or unsafe practice. To the fullest extent permitted by law, subcontractors and self-employed operatives shall indemnify and hold harmless Concept Management Group Ltd against any loss, damage, liability, enforcement action, cost or expense arising from their breach of statutory duty, negligent workmanship, failure to comply with this Integrated Management System, or failure to meet contractual obligations flowing from upstream JCT or NEC arrangements. Recoverable losses may include, without limitation, regulatory fines, legal costs, consultant fees, remedial works, delay damages, insurance excess payments and third-party claims.

This indemnity reflects standard risk allocation principles commonly embodied within JCT and NEC subcontracts, whereby parties are responsible for the consequences of their own default. Nothing within this section shall exclude or limit liability where such exclusion would be unlawful. By signing the Main Signing Page of this Integrated Management System, the subcontractor, labour-only operative or self-employed individual confirms that they understand and accept their independent legal status, acknowledge that responsibility for safe execution of their work remains with them, agree to comply with all statutory and contractual obligations, and accept the indemnity and risk allocation provisions set out above. Ignorance of these provisions shall not constitute a defence in the event of enforcement action, removal from site, contractual termination, or recovery proceedings.

For the avoidance of doubt, individuals engaged by Concept Management Group Ltd on a labour-only or self-employed basis are engaged as independent contractors and not as employees, workers, partners, or agents of the Company. This policy reflects the true commercial intention of the parties and forms part of the contractual framework governing the engagement. The individual acknowledges that they operate on a self-employed basis and retain responsibility for their own tax affairs, National Insurance contributions, statutory payments, insurances where required, and compliance with applicable legislation. Nothing within this Integrated Management System, nor within any supervision, instruction, or coordination undertaken for health and safety or operational purposes, shall be construed as creating a contract of employment.

The provision of site supervision, sequencing instruction, quality control checks, health and safety direction, or compliance monitoring is undertaken strictly to discharge statutory duties and main contract obligations. Such oversight does not create mutuality of obligation beyond the agreed scope of works, does not guarantee continuity of work, and does not remove the individual's responsibility for the manner in which they carry out their trade activities.

Labour-only and self-employed operatives remain responsible for:

- Exercising their own skill, judgement, and trade competence.



- Complying with statutory duties under health and safety legislation.
- Rectifying defective workmanship attributable to their acts or omissions.
- Maintaining appropriate insurance cover where required by law or contract.
- Ensuring that their conduct does not expose the Company to regulatory, financial, or reputational risk.

The Company retains the right to allocate, reallocate, suspend, or withdraw work based on operational requirements, performance standards, or safety considerations. No entitlement to ongoing work, notice periods beyond agreed terms, employment benefits, holiday pay, sick pay, pension provision, or other employee rights shall arise by virtue of engagement under this policy. Where required for contractual or regulatory purposes, the Company may review the status of engagement arrangements to ensure continued compliance with tax and employment legislation. Such review shall not be interpreted as an acceptance of employment status.

Additional Compliance, Authority and Continuing Liability Provision

The Company reserves the right, at any time during the engagement, to request updated evidence of competence, insurance cover, tax status and regulatory compliance. Such verification forms part of the Company's due diligence obligations. Failure to provide reasonable evidence within an appropriate timeframe may result in suspension of works pending INFORMATION. The responsibility for maintaining valid insurance and statutory compliance remains with the subcontractor, labour-only operative or self-employed individual at all times. No subcontractor, labour-only operative or self-employed individual shall have authority to bind Concept Management Group Ltd to any contractual commitment, variation, financial obligation or representation unless expressly authorised in writing by a Director or appointed senior manager. Any act outside such authority shall be treated as *ultra vires* and shall not create liability on the part of the Company.

All subcontracted parties shall comply with this Integrated Management System, applicable legislation, and any upstream contractual obligations binding upon the Company under JCT, NEC or other forms of contract, such obligations applying *mutatis mutandis* where relevant to the subcontracted works. This ensures consistent standards of safety, quality and programme compliance across all project levels. Any supervision, inspection, review, coordination or comment undertaken by the Company is carried out for statutory compliance and operational management purposes only and shall not, *ipso facto*, constitute acceptance of design responsibility, workmanship, or transfer of liability. Responsibility for the safe and proper execution of the works remains with the party undertaking them.

The subcontractor, labour-only operative or self-employed individual agrees to indemnify the Company against losses, liabilities, enforcement costs or third-party claims arising from breach of statutory duty, negligence or failure to comply with agreed obligations. This indemnity reflects the allocation of responsibility between independent commercial parties and shall continue to apply following completion or termination of the engagement, applying *mutatis mutandis* to any remedial or consequential works.

Should any provision of this section be deemed unenforceable, it shall be severed *pro tanto*, and the remaining provisions shall remain in full force and effect.

By signing the Main Signing Page, the signatory acknowledges that these provisions reflect the agreed allocation of responsibility between independent parties and form a binding component of the contractual and safety framework governing the works.

References

1. Construction (Design and Management) Regulations 2015 – <https://www.legislation.gov.uk/uksi/2015/51>
2. Health and Safety at Work etc. Act 1974 – <https://www.legislation.gov.uk/ukpga/1974/37>
3. HSE Contractor Guidance – <https://www.hse.gov.uk/construction>



SECTION 5 - ENVIRONMENTAL GOVERNANCE, POLLUTION CONTROL AND SUSTAINABILITY OBLIGATIONS

Concept Management Group Ltd, Company Number 14084549, trading as Concept Management Group, recognises that its facilities management, landscaping, commercial cleaning, property maintenance, M&E and associated activities have the potential to impact the environment through material consumption, waste generation, energy usage, emissions, transport movements, noise, vibration, dust and the storage or handling of potentially hazardous substances. The Company therefore establishes this Environmental Governance and Pollution Control framework as an integral component of its Integrated Management System to ensure lawful operation, prevention of pollution so far as reasonably practicable, and protection of the Company and its Directors from regulatory, civil and reputational exposure. The Company acknowledges its statutory duties under the Environmental Protection Act 1990, the Environment Act 2021, the Waste (England and Wales) Regulations 2011, and all applicable subordinate legislation, codes of practice and regulatory guidance. Environmental compliance is treated as a core operational obligation and not merely an administrative requirement. Directors retain strategic oversight of environmental performance and shall ensure that appropriate systems, resources and competent supervision are in place. Operational responsibility is delegated to managers and supervisors to embed environmental controls within project planning and execution. Such delegation constitutes structured governance and does not diminish corporate accountability.

All works undertaken by or on behalf of the Company shall be planned and executed in a manner that seeks to minimise adverse environmental impact. Environmental considerations shall form part of pre-construction planning, risk assessment and method statement preparation. Where reasonably practicable, the Company shall seek to reduce waste generation at source, optimise material efficiency, and select products with due consideration to environmental impact, durability and lifecycle performance. Sustainable procurement principles shall be applied where commercially viable, including preference for responsibly sourced materials and reduced packaging. Waste management shall comply strictly with statutory duty of care requirements. Waste shall be segregated where practicable, stored securely to prevent escape, contamination, fire risk or nuisance, and removed only by licensed waste carriers. Waste Transfer Notes and Hazardous Waste Consignment Notes shall be completed accurately and retained in accordance with statutory timeframes. The Company shall maintain records sufficient to demonstrate lawful disposal and traceability. Subcontractors, labour-only and self-employed operatives generating waste remain responsible for ensuring that such waste is managed lawfully unless expressly agreed otherwise in writing. The Company shall not assume liability for unlawful disposal carried out independently by third parties.

Pollution prevention forms a central component of environmental control. Activities presenting risk to air, land or water shall be subject to proportionate preventative measures. Fuels, oils, chemicals and other potentially hazardous substances shall be stored in suitable containers with appropriate labelling and, where required, secondary containment. Refuelling and decanting activities shall be controlled to reduce spill risk. Spill response materials shall be made available where reasonably necessary, and any spill, leak or contamination event shall be reported immediately to supervision. Where environmental harm arises due to negligent or unlawful acts or omissions of a subcontractor or operative, the Company reserves the right to recover all associated costs including remediation, investigation, regulatory enforcement, consultant fees and third-party claims. The Company acknowledges its responsibilities in relation to noise, vibration and dust emissions. Where site activities may affect neighbouring properties, sensitive receptors or members of the public, appropriate mitigation measures shall be implemented. Such measures may include dust suppression, extraction systems, acoustic barriers, equipment maintenance, vibration control methods and restriction of working hours in accordance with local authority or planning requirements. The Company shall cooperate with Principal Contractors and regulatory authorities to ensure compliance with environmental permit conditions and statutory nuisance provisions.

Transport and logistics associated with Company operations shall be planned to reduce unnecessary vehicle movements where practicable. Drivers engaged in Company activities shall comply with road safety legislation and environmental requirements relating to emissions, idling and route management. Where practicable, consolidation of deliveries and efficient scheduling shall be encouraged to reduce carbon impact and local disruption. The Company recognises the growing importance of climate responsibility and sustainability within the construction sector. While proportionate to its operational scale, the Company commits to continuous improvement in environmental performance. This includes periodic review of waste volumes, material usage, energy consumption and environmental incidents to identify opportunities for reduction and efficiency improvement. Environmental performance shall be monitored through site inspections and management review. Non-compliance shall be addressed promptly and corrective action implemented without undue delay. Where operating as a subcontractor, the Company shall review and comply with the environmental provisions contained within the Principal Contractor's Construction Phase Plan and any project-specific environmental management requirements. Where the Company exercises control over a work area, it shall ensure that environmental standards are maintained in accordance with statutory and contractual obligations. Works shall not proceed where environmental risk is grossly unmanaged or where regulatory compliance cannot be reasonably demonstrated.

Directors shall not incur personal liability for environmental breaches where adequate environmental management systems, supervision and due diligence procedures have been established and maintained in accordance with statutory principles governing corporate responsibility. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they have read and understood this Environmental Governance section in full, accept their personal and contractual responsibilities in respect of environmental protection, and acknowledge that environmental breaches may result in removal from site, suspension of works, recovery of costs, contractual termination and, where applicable, reporting to enforcement authorities.



Net Zero and Carbon Responsibility Statement

Concept Management Group Ltd recognises the increasing importance of climate responsibility within the facilities management, property maintenance, landscaping, cleaning and building-services sectors. While proportionate to the scale and nature of its operations, the Company acknowledges its role in supporting the transition towards reduced greenhouse gas emissions and improved environmental performance across the built environment. The Company commits to a principle of continuous improvement in relation to carbon awareness and environmental impact. This includes consideration, where reasonably practicable, of material efficiency, waste reduction, responsible sourcing, transport optimisation, and energy-conscious working practices. The Company shall seek to reduce avoidable fuel consumption through efficient logistics planning and discourage unnecessary idling of vehicles and plant. Opportunities to improve building performance through planned maintenance, efficient M&E operation, responsible cleaning practices, water management, grounds management and energy-conscious service delivery shall be actively supported.

Concept Management Group Ltd recognises that well-managed facilities, efficient M&E systems, responsible cleaning, effective grounds maintenance and timely property maintenance can reduce waste, avoid unnecessary resource use and support better building performance. The Company therefore acknowledges that the quality and integrity of its service delivery form part of the wider sustainability performance of the assets it supports. Works shall be carried out to specification, manufacturer guidance and relevant industry standards to support safe, efficient and sustainable operation. Where required by clients or principal contractors, the Company shall cooperate with reasonable carbon reporting or environmental data requests relevant to its scope of works. Any environmental targets adopted by the Company shall be proportionate, evidence-based, and subject to periodic review to ensure they remain commercially and operationally realistic. The Company does not represent itself as carbon neutral unless formally certified but commits to working in good faith toward measurable improvement over time. Environmental and carbon considerations shall form part of ongoing management review within this Integrated Management System.

References

1. Environmental Protection Act 1990 – <https://www.legislation.gov.uk/ukpga/1990/43>
2. Environment Act 2021 – <https://www.legislation.gov.uk/ukpga/2021/30>
3. Waste (England and Wales) Regulations 2011 – <https://www.legislation.gov.uk/ukxi/2011/988>



SECTION 6 - WORKFORCE CONDUCT, ETHICS, LEGAL COMPLIANCE AND PROFESSIONAL STANDARDS

Concept Management Group Ltd, Company Number 14084549, trading as Concept Management Group, recognises that operational competence alone is insufficient to safeguard the Company's commercial integrity and statutory position. Ethical conduct, lawful behaviour, and professional standards are fundamental to the protection of the Company, its directors, its clients, and its workforce. This section establishes a formal framework governing behaviour, integrity, equality, anti-bribery compliance, modern slavery prevention, drug and alcohol standards, right-to-work verification, and professional conduct expectations. The Company operates a strict zero-tolerance approach to bribery and corruption in accordance with the Bribery Act 2010. No Director, employee, Subcontractors, Labour only, Self-Employed, consultant, or representative of the Company shall offer, promise, give, request, or accept any financial or other advantage intended to induce or reward improper performance of a relevant function. This prohibition extends to facilitation payments, undisclosed commissions, excessive hospitality, or inducements offered to secure contracts or preferential treatment. The Company's reputation and commercial relationships depend upon demonstrable integrity. Any breach may expose the Company to unlimited fines and severe reputational damage.

SIGNATORY ACTION REQUIREMENT – BRIBERY OR IMPROPER INDUCEMENT

If you are offered any financial advantage, gift, hospitality, or inducement that could reasonably be perceived as influencing business decisions, you must:

1. Refuse the offer immediately.
2. Report the matter in writing to Company management without delay.
3. Cease involvement in the transaction until instructed otherwise.
Failure to report may result in disciplinary and contractual action.

The Company further recognises its obligations under the Modern Slavery Act 2015. All labour engaged must be freely employed, fairly treated, and legally entitled to work in the United Kingdom. The Company prohibits forced labour, debt bondage, human trafficking, or exploitation within its operations or supply chain. Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, Labour only, Self-Employed, Labour only, Self-Employed, warrant that all persons supplied are lawfully engaged and properly remunerated.

SIGNATORY ACTION REQUIREMENT – SUSPECTED EXPLOITATION OR ILLEGAL WORKING

If you suspect that any worker is being coerced, exploited, or is unlawfully employed, you must:

1. Report the concern immediately to Company management.
2. Avoid confrontation or personal investigation.
3. Cooperate with any formal inquiry initiated.
Failure to report may expose you to personal liability under UK law.

The Company upholds equality of opportunity and prohibits discrimination on grounds protected under the Equality Act 2010. All individuals must be treated with dignity and respect. Harassment, bullying, or discriminatory conduct will not be tolerated and may result in immediate removal from site.

Drug and alcohol misuse presents a serious safety risk in construction environments. The Company prohibits attendance at work under the influence of alcohol, illegal substances, or misuse of prescription medication where such impairment affects safety or performance.

SIGNATORY ACTION REQUIREMENT – IMPAIRMENT OR SUBSTANCE MISUSE

If you are prescribed medication that may impair concentration or physical coordination, you must:

1. Inform your supervisor confidentially prior to commencing work.
2. Refrain from high-risk tasks until cleared.
3. Comply with any reasonable instruction regarding temporary reassignment.
Failure to disclose may constitute gross misconduct.

Professional conduct extends to behaviour towards clients, members of the public, and other trades. Aggressive conduct, unsafe acts, refusal to follow lawful instruction, or damage to Company reputation shall be treated as serious breaches. The Directors shall not incur personal liability for acts of bribery, discrimination, exploitation, or misconduct committed by individuals where the Company has established adequate procedures and exercised due diligence. Responsibility for unlawful conduct remains with the individual committing the act. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they have read this Workforce Conduct and Ethics section in its entirety, understand the standards imposed, accept personal accountability for lawful behaviour, and acknowledge that breach may result in removal, termination, financial recovery, and potential reporting to law enforcement or regulatory authorities.



References

1. Bribery Act 2010 – <https://www.legislation.gov.uk/ukpga/2010/23> & <https://www.legislation.gov.uk/ukpga/2010/15>
2. Modern Slavery Act 2015 – <https://www.legislation.gov.uk/ukpga/2015/30> & <https://www.legislation.gov.uk/ukpga/2006/13>



SECTION 7 - PERMIT TO WORK SYSTEMS AND HIGH-RISK ACTIVITY CONTROL

Concept Management Group Ltd recognises that certain activities present elevated and potentially catastrophic risks that cannot be controlled through routine supervision alone. Accordingly, a formal Permit to Work (PTW) system operates as a mandatory control mechanism governing all designated high-risk activities. The Permit to Work system forms part of the Company's statutory risk management arrangements and shall be treated as a live safety control document rather than an administrative formality. High-risk activities requiring a valid Permit to Work include, but are not limited to, hot works, confined space entry, live electrical or mechanical services intervention, intrusive works affecting fire protection systems, lifting operations, work at height beyond standard control measures, and any task involving isolation of energy sources. No such activity shall commence unless a site-specific permit has been issued by an authorised and competent person.

Before commencing any hot works, confined space entry, live services intervention, lifting operation, or other designated high-risk activity, all personnel must confirm that a valid and correctly authorised Permit to Work has been issued for the specific task and location. They must review and fully understand all hazard controls, isolation requirements, emergency arrangements, monitoring provisions and safety measures specified within the permit documentation. All prerequisite conditions must be verified as satisfied, including atmospheric testing where applicable, isolation and lock-off confirmation, fire watch arrangements, rescue planning, plant certification and equipment inspection. Each operative engaged in permitted work must sign the Permit to Work acknowledging comprehension and acceptance of the specified controls. If site conditions change, control measures become ineffective, or unforeseen hazards arise, work must cease immediately and supervision must be informed without delay. The authority to stop work applies to all individuals engaged in the activity and shall not require prior approval.

Under no circumstances shall high-risk work be undertaken without a current and valid Permit to Work. Failure to comply shall result in immediate cessation of the activity and removal from site pending investigation. Repeated or deliberate breaches may result in termination of engagement and, where appropriate, notification to enforcing authorities. The Company treats unauthorised high-risk activity as a serious breach of statutory duty and contractual obligation. Permits shall automatically expire at the time stated and shall not be extended or revalidated without formal reassessment of the working environment and associated risks. A new permit must be issued where conditions materially change, the scope of work is amended, shift patterns change, isolation arrangements are altered, or work is interrupted for any significant duration. The absence of a valid permit renders the activity unauthorised.

Supervisors and managers are responsible for verifying that permit conditions are implemented and maintained throughout the duration of the task. This includes monitoring compliance, ensuring isolations remain secure, verifying ongoing atmospheric safety where required, and confirming that emergency arrangements remain viable. However, supervisory oversight does not remove the individual's personal legal duty under health and safety legislation. Every person engaged in permitted works retains direct accountability for compliance with statutory duties and Company procedures. The Company reserves the right to audit, inspect and review Permit to Work systems at any time, whether operated internally or under the control of a Principal Contractor. Findings may result in immediate suspension of the activity where compliance is not demonstrably achieved. Records of permits shall be retained as evidence of due diligence and may be reviewed during internal audit, client audit or regulatory inspection.

Subcontractors, labour-only and self-employed operatives remain wholly responsible for the safe planning and execution of permitted works undertaken under their control. Acceptance of a Permit to Work does not transfer responsibility for safe systems of work, technical competence or statutory compliance. Subcontractors must ensure that personnel are appropriately trained in permit procedures, understand isolation protocols, and are competent to undertake the activity described. The Company's review or approval of permit documentation shall not relieve subcontractors of their independent legal obligations. Where the Company is operating under a Principal Contractor, the Permit to Work system shall operate in alignment with site-specific procedures, applying *mutatis mutandis* where required to ensure consistency with upstream contractual obligations.

Energy Isolation and Lock-Off Protocol Statement

Where works involve electrical, mechanical, hydraulic, pneumatic, thermal or other stored energy systems, no intervention shall take place unless the relevant energy source has been positively identified, isolated, and secured against inadvertent re-energisation. Isolation shall include appropriate lock-off devices, warning tags, and verification of zero energy state prior to commencement of work. Isolation keys shall remain under the control of the person undertaking the work unless a formal group lock system is implemented. Testing for dead, discharge of stored energy, and confirmation of isolation shall be recorded where reasonably practicable. No person shall remove, interfere with, or bypass isolation controls unless formally authorised and the work area has been made safe. Failure to comply with isolation procedures shall be treated as a serious breach of Company policy and statutory duty.

Hierarchy of Control Reinforcement Clause

In the planning and execution of all works, risks shall be controlled in accordance with the recognised hierarchy of control principles. Elimination of the hazard shall be prioritised wherever reasonably practicable. Where elimination is not feasible, substitution, engineering controls, collective protective measures and administrative controls shall be implemented before reliance is placed upon personal protective equipment. Personal protective equipment shall be regarded as a supplementary and residual control measure rather than a primary safeguard. No task shall proceed where risk has not been reduced so far as is reasonably practicable through structured



application of these principles. Any deviation from this hierarchy must be justified by documented risk assessment and approved by competent supervision.

By signing the Main Signing Page of this Integrated Management System, the signatory formally confirms that they have read and understood the Company's Permit to Work requirements, accept their personal and organisational responsibilities under this system, agree to comply fully with all permit controls, statutory duties and supervisory instructions, and acknowledge that failure to comply may result in disciplinary or contractual action.

References

1. Construction (Design and Management) Regulations 2015 – <https://www.legislation.gov.uk/uksi/2015/51>
2. Work at Height Regulations 2005 – <https://www.legislation.gov.uk/uksi/2005/735>
3. Confined Spaces Regulations 1997 – <https://www.legislation.gov.uk/uksi/1997/1713>



SECTION 8 - COMPETENCE, TRAINING, SKILLS, KNOWLEDGE AND EXPERIENCE FRAMEWORK

Concept Management Group Ltd recognises that competence is not optional; it is a statutory obligation under the Construction (Design and Management) Regulations 2015 and a fundamental requirement of SSIP, Constructionline and Safe Contractor assessment criteria. Competence under CDM is defined as the combination of skills, knowledge, training and experience necessary to carry out work safely and without risk to health. The Company therefore establishes this Competence and Training Framework as a formal mechanism to ensure that all persons engaged are capable of discharging their duties lawfully, safely and to the required technical standard. The Company shall not appoint, engage or permit any individual to undertake work unless reasonably satisfied as to their competence for the specific task. Assessment shall be proportionate to the level of risk and responsibility involved. Consideration shall include trade qualifications, vocational training, industry-recognised certification, practical experience, behavioural standards, previous performance history, supervisory capability, and understanding of relevant statutory duties. Competence shall be task-specific; possession of a qualification does not confer blanket authority to undertake unrelated activities.

Where supervisory or managerial responsibilities are undertaken, enhanced competence standards shall apply. Supervisors must demonstrate knowledge of CDM duties, risk assessment methodology, permit systems, method statement control, accident reporting requirements and behavioural safety management. Managers must be capable of identifying foreseeable risk, intervening appropriately, and ensuring compliance with both statutory obligations and Company procedures. Industry-recognised certification may include, where applicable, CSCS registration, SSSTS or SMSTS training, asbestos awareness, working at height, confined space training, manual handling instruction, abrasive wheels certification, plant operator accreditation, PASMA or IPAF certification, and trade-specific qualifications relevant to facilities management, landscaping, commercial cleaning, property maintenance, electrical, M&E, plant and equipment operation. The Company expressly recognises that possession of a card or certificate alone does not establish competence; competence must be evidenced through safe behaviour, technical ability and demonstrated understanding of risk control.

Training needs shall be reviewed periodically and where operational changes, legislative updates or incident investigations indicate a requirement for refresher or additional instruction. Records of training, certification and competence assessment shall be retained and may be reviewed by Clients, Principal Contractors, insurers or accreditation bodies as evidence of due diligence. The Company reserves the right to require refresher training, supervision enhancement or reassessment where standards fall below expectation. Competence is a continuing obligation. Individuals must ensure that their knowledge remains current and that certification remains valid. Where certification expires, is suspended or revoked, the individual must immediately notify management and cease undertaking any activity requiring that certification until updated evidence is provided. Failure to disclose invalid or expired certification shall constitute a serious breach of Company policy and may result in removal from site or termination of engagement.

Subcontractors, labour-only and self-employed operatives warrant that all personnel supplied are competent, appropriately trained and lawfully entitled to undertake the works assigned. The Company's review of documentation or credentials is undertaken for verification purposes only and shall not transfer liability for competence to the Company. Responsibility for ensuring that specialist works are executed safely and competently remains with the subcontractor or operative undertaking those works. Where the Company operates under a Principal Contractor or upstream JCT or NEC arrangement, competence standards shall apply *mutatis mutandis* in alignment with project-specific requirements. Failure to maintain adequate competence may expose the Company to contractual breach; accordingly, the Company reserves the right to suspend or remove any individual whose competence is reasonably called into question. SIGNATORY ACTION REQUIREMENT – COMPETENCE AND TRAINING By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they have the below the signatory further accepts that competence is both a statutory and contractual requirement and forms a fundamental condition of engagement.

- Hold valid and relevant certification for the tasks they undertake;
- Accept personal responsibility for maintaining lawful and current competence;
- Will notify the Company immediately of any change affecting their qualification status;
- Acknowledge that undertaking work without valid competence constitutes serious misconduct.



SECTION 9 - CONSULTATION, COMMUNICATION AND WORKER ENGAGEMENT

Concept Management Group Ltd recognises that meaningful consultation and effective communication are fundamental components of a robust health and safety management system. In accordance with the Health and Safety (Consultation with Employees) Regulations 1996 and the general duties imposed by the Health and Safety at Work etc. Act 1974, the Company is committed to engaging workers on matters that may affect their health, safety, and welfare. The Company acknowledges that proactive consultation not only fulfils statutory obligations but also materially reduces operational risk, enhances hazard awareness, strengthens behavioural safety standards, and evidences due diligence under Construction (Design and Management) (CDM) frameworks andSSIP accreditation requirements. Engagement is therefore treated as an active management function rather than a procedural formality.

Consultation shall take place at appropriate stages of project planning and delivery, including:

- Introduction of new processes, equipment, or substances.
- Changes to work methods or sequencing.
- Development and review of risk assessments and method statements.
- Investigation of incidents, near misses, and dangerous occurrences.
- Identification of training needs.
- Implementation of corrective or preventative measures.

Where safety representatives are appointed, they shall be provided with sufficient information and access to enable them to discharge their functions effectively. Where no formal representatives exist, direct consultation with employees shall occur in a structured and documented manner.

Communication Framework

The Company shall ensure that communication methods are proportionate to the size, complexity, and risk profile of each project. Communication mechanisms include, but are not limited to:

- **Site Inductions** – Delivered prior to commencement of work, detailing site rules, emergency arrangements, welfare facilities, access controls, risk management expectations, environmental requirements, and behavioural standards.
- **Toolbox Talks** – Conducted at regular intervals and targeted to specific activities or emerging risks, reinforcing safe systems of work and promoting continuous improvement.
- **Pre-Start Briefings and Task Briefings** – Ensuring clarity regarding scope, sequencing, interfaces with other trades, and high-risk activities.
- **Safety Alerts and Bulletins** – Issued where incidents, industry learning, or regulatory updates necessitate heightened awareness.
- **Management Site Visits and Open Dialogue** – Providing visible leadership and direct engagement with operatives.

All inductions, briefings, and consultations shall be recorded. Attendance registers shall be maintained, signed, and retained as auditable evidence of communication. Records shall form part of the project health and safety file where required.

Worker Engagement and Reporting Culture

Concept Management Group Ltd is committed to fostering a positive safety culture in which workers feel confident to raise concerns without fear of reprisal, disadvantage, or victimisation. The Company operates a non-retaliation principle in respect of genuine safety reporting.

Employees and Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, Labour only, Self-Employed, Labour only, Self-Employed, are encouraged to report:

- Unsafe acts or behaviours.
- Defective plant or equipment.
- Inadequate control measures.
- Environmental hazards.
- Procedural shortcomings.
- Near misses and potential improvement opportunities.

All concerns shall be reviewed promptly by supervision or management. Where justified, corrective or preventative action shall be implemented without unreasonable delay. Feedback shall, where practicable, be provided to the reporting individual to reinforce engagement and demonstrate responsiveness. Consultation enhances the effectiveness of management controls but does not transfer managerial responsibility. Ultimate responsibility for the provision of safe systems of work remains with the Company's directors and appointed managers. However, safety performance is a shared responsibility requiring active participation at all levels.



SIGNATORY ACTION REQUIREMENT – REPORTING HAZARDS

All personnel have an individual legal duty to protect themselves and others from harm. If you identify a hazard, unsafe condition, procedural deficiency, or unsafe act, you must:

1. Stop work immediately where there is a risk of imminent danger to persons, property, or the environment.
2. Inform site supervision or management without delay.
3. Cooperate fully in the implementation of corrective, preventative, or containment measures.
4. Refrain from resuming affected activities until the hazard has been assessed and control measures reinstated.

Failure to report a known hazard, deliberate concealment of unsafe conditions, or disregard for established reporting procedures may constitute a breach of Company policy and statutory duty and may result in disciplinary action.

By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they:

- Understand their duty to participate in consultation processes.
- Accept their responsibility to communicate hazards, risks, and improvement opportunities.
- Acknowledge the importance of active engagement in maintaining a safe working environment.
- Agree to comply fully with reporting and communication requirements.

References

1. Health and Safety (Consultation with Employees) Regulations 1996 – <https://www.legislation.gov.uk/uksi/1996/1513>
2. Health and Safety at Work etc. Act 1974 – <https://www.legislation.gov.uk/ukpga/1974/37>



SECTION 10 - INCIDENT REPORTING, INVESTIGATION AND ENFORCEMENT

Concept Management Group Ltd recognises that timely reporting and structured investigation of incidents are critical to ensuring legal compliance, protecting employees and Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, , Labour only, Self-Employed, , Labour only, Self-Employed, , safeguarding insurer interests, and driving continuous improvement within the Company's Integrated Management System. The Company adopts a zero-tolerance approach to the concealment or misrepresentation of incidents. All accidents, injuries, occupational ill-health cases, near misses, dangerous occurrences, property damage events, environmental incidents, and unsafe conditions must be reported immediately to site supervision or management, regardless of perceived severity.

Prompt reporting enables:

- Immediate implementation of corrective and containment measures.
- Preservation of evidence where required.
- Compliance with statutory reporting obligations.
- Accurate recording for trend analysis and risk review.
- Protection of contractual and insurance positions.
- Identification of systemic weaknesses in planning, supervision, or control measures.

Statutory Reporting (RIDDOR)

Where an incident meets the reporting criteria defined under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), the Company shall ensure that formal notification is submitted to the Health and Safety Executive (HSE) within the prescribed statutory timescales. This includes, but is not limited to:

- Fatalities and specified serious injuries.
- Over-seven-day incapacitation injuries.
- Dangerous occurrences as defined by Schedule 2 of the Regulations.
- Occupational diseases diagnosed in writing by a medical practitioner.
- Gas-related incidents where applicable.

Responsibility for determining RIDDOR applicability rests with Company management. However, accurate and timely information from those involved is essential to enable compliance. Failure to report incidents internally may result in breach of statutory duties under the Health and Safety at Work etc. Act 1974 and may expose individuals and the Company to enforcement action.

Investigation Process

All reportable incidents shall be subject to proportionate investigation. The depth and formality of the investigation shall reflect the severity and potential consequences of the event. Investigations shall seek to:

- Identify immediate, underlying, and root causes.
- Assess the adequacy of existing risk assessments and method statements.
- Review supervision, training, and competency arrangements.
- Determine whether control measures were implemented and effective.
- Recommend corrective and preventative actions.
- Prevent recurrence through systemic improvement.

Investigations are conducted for learning and risk reduction purposes and are not intended to apportion blame. However, where deliberate misconduct, reckless disregard for safety, falsification of records, or wilful breach of Company procedures is identified, disciplinary action may follow.

The Company reserves the right to:

- Conduct formal internal investigations.
- Require written statements from employees, Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, , Labour only, Self-Employed, and witnesses.
- Secure relevant documentation, permits, CCTV records, or plant data.
- Engage external specialists where appropriate.

Subcontractors, Labour only, Self-Employed, s, Labour only, Self-Employed, Labour only, Self-Employed, Labour only, Self-Employed, are contractually obliged to cooperate fully with any investigation. Failure to provide reasonable cooperation, or obstruction of the investigative process, may constitute a material breach of contract and may result in suspension or termination of engagement.



Enforcement and Corrective Measures

Following investigation, management shall determine appropriate corrective actions, which may include:

- Revision of risk assessments and method statements.
- Additional training or supervision.
- Modification of equipment or systems.
- Disciplinary measures where justified.
- Contractual review of Subcontractors, Labour only, Self-Employed, performance.
- Reporting to insurers or regulatory authorities where required.

Corrective actions shall be documented, assigned, and monitored to completion.

SIGNATORY ACTION REQUIREMENT - INCIDENT OCCURRENCE

In the event of any accident, injury, near miss, dangerous occurrence, or environmental incident, all personnel must:

1. Make the area safe where reasonably practicable and without exposing themselves or others to further risk.
2. Inform site supervision or management immediately.
3. Seek first aid or emergency assistance where required.
4. Provide a clear, honest, and factual account of events.
5. Preserve the scene in the case of serious injury, fatality, or significant damage, unless emergency intervention is necessary to prevent further harm.

No individual shall interfere with evidence, alter documentation, or provide misleading information. Integrity in reporting is mandatory.

The Directors shall exercise due diligence in ensuring appropriate systems for reporting, investigation, and compliance are implemented and maintained. Where adequate procedures, monitoring systems, and reasonable oversight are demonstrably in place, personal liability shall be assessed in accordance with statutory principles governing director responsibility.

By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they:

- Understand their obligation to report incidents promptly and accurately.
- Accept their duty to cooperate fully in investigations.
- Acknowledge that failure to comply may result in disciplinary or contractual action.

References

1. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) – <https://www.legislation.gov.uk/ukxi/2013/1471>
2. HSE Guidance on Incident Reporting – <https://www.hse.gov.uk/riddor>



SECTION 11 - DATA PROTECTION, CONFIDENTIALITY AND GDPR COMPLIANCE

Concept Management Group Ltd recognises that the lawful and secure handling of personal data is a fundamental corporate responsibility and an essential component of professional and contractual integrity. In the course of its operations, the Company processes limited categories of personal data, including but not limited to:

- Employee and worker records (including contact details, right-to-work documentation, payroll data, training and competency records);
- Subcontractors, Labour only, Self-Employed, and supplier contact information.
- Professional certification and accreditation documentation.
- Health and safety training records.
- Incident reports and investigation records.
- Site access logs and induction records.
- Client contact and contractual information.

The Company acknowledges its obligations under the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and confirms its commitment to ensuring that all personal data is processed in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, and confidentiality.

Lawful Basis for Processing

Personal data shall only be processed where a lawful basis exists, including:

- Performance of a contract.
- Compliance with legal obligations.
- Legitimate interests pursued by the Company, provided such interests do not override individual rights.
- Consent where applicable and appropriate.

Data subjects shall be informed, where required, of the purposes for which their data is processed and their rights under applicable legislation.

Data Retention and Storage

Personal data shall be retained only for as long as necessary to fulfil contractual, statutory, or regulatory requirements. Retention periods shall reflect obligations under employment law, tax law, health and safety legislation, and limitation periods for potential claims. Where retention periods expire, data shall be securely deleted, anonymised, or destroyed in a manner preventing unauthorised reconstruction. All data, whether held electronically or in hard copy format, shall be stored securely. Appropriate technical and organisational measures shall be implemented, including:

- Password-protected systems and secure servers.
- Controlled access permissions.
- Secure email and file-sharing protocols.
- Locked storage for physical documentation.
- Regular system updates and anti-malware protection.

Access to personal data shall be strictly limited to authorised personnel whose role necessitates such access. Unauthorised access, copying, or distribution is strictly prohibited.

Confidentiality Obligations

All employees, Subcontractors, Labour only, Self-Employed, Labour only, Self-Employed, Labour only, Self-Employed, labour-only personnel, and self-employed operatives who handle Company or Client information are bound by confidentiality obligations. Information obtained through engagement with the Company must not be disclosed to third parties without lawful authority or management approval. Subcontractors, Labour only, Self-Employed, and external parties who process data on behalf of the Company warrant that they shall:

- Comply with all applicable data protection legislation.
- Implement appropriate technical and organisational safeguards.
- Notify the Company promptly of any suspected breach.
- Refrain from processing data for unauthorised purposes.



Failure to comply with data protection requirements may constitute a material contractual breach and may result in termination of engagement and, where applicable, referral to regulatory authorities.

Data Subject Rights

Where applicable, individuals have rights under UK GDPR, including:

- The right of access to their personal data.
- The right to rectification of inaccurate data.
- The right to erasure in certain circumstances.
- The right to restrict or object to processing.
- The right to lodge a complaint with the Information Commissioner's Office (ICO).

Requests relating to data subject rights shall be referred immediately to Company management for formal handling within statutory timeframes.

SIGNATORY ACTION REQUIREMENT – DATA SECURITY

If you become aware of, suspect, or inadvertently cause a data breach, unauthorised disclosure, loss of documentation, or cyber-security incident, you must:

1. Report the matter immediately to Company management.
2. Preserve all relevant information, devices, emails, and documentation.
3. Avoid further dissemination or discussion of the compromised data.
4. Cooperate fully with any internal investigation or mitigation process.

Prompt reporting is critical, as certain breaches may require notification to the Information Commissioner's Office within strict statutory deadlines. Failure to report a known or suspected breach may result in disciplinary or contractual action.

The Directors shall ensure that appropriate governance procedures, training, and oversight mechanisms are maintained to support compliance with applicable data protection legislation. Where adequate systems and due diligence are demonstrably in place, director responsibilities shall be assessed in accordance with statutory principles governing corporate accountability.

By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they:

- Understand their obligations regarding confidentiality and data protection.
- Agree to handle personal data responsibly and securely.
- Accept their duty to report any suspected breach without delay.

References

1. Data Protection Act 2018 – <https://www.legislation.gov.uk/ukpga/2018/12>
2. UK GDPR Guidance – <https://ico.org.uk>



SECTION 12 - EMERGENCY PREPAREDNESS AND FIRE SAFETY

Concept Management Group Ltd recognises that effective emergency preparedness is essential to protecting life, property, contractual continuity, and regulatory compliance. The Company shall ensure that emergency arrangements are established, communicated, and maintained in proportion to the scale, complexity, and risk profile of each project. Emergency planning shall form part of the project-specific risk assessment and planning process. Where operating under the control of a Principal Contractor, the Company shall coordinate fully with site-wide emergency procedures to ensure alignment and clarity of responsibilities.

Emergency Planning and Arrangements

Emergency arrangements shall address, as a minimum:

- Fire prevention and response procedures.
- Evacuation routes and escape planning.
- Assembly points and headcount systems.
- First aid provision and access to trained personnel.
- Communication protocols in the event of serious injury or incident.
- Liaison with emergency services where required.
- Site-specific risks such as confined spaces, hot works, hazardous substances, or high-level working areas.

All personnel shall receive site induction briefings detailing emergency procedures prior to commencing work. Inductions shall clearly identify alarm signals, escape routes, prohibited actions during evacuation, and designated assembly areas. Escape routes must remain unobstructed at all times. Materials, waste, and equipment shall not be stored in a manner that compromises safe egress. Temporary works and ductwork installations must not impede emergency routes without prior authorisation and suitable alternative arrangements.

Fire Safety Controls

In accordance with the Regulatory Reform (Fire Safety) Order 2005, the Company shall cooperate with the Responsible Person and ensure that its activities do not introduce uncontrolled fire risk.

Fire safety measures shall include:

- Strict control of hot works under the Company's Permit to Work system.
- Removal or protection of combustible materials prior to hot works.
- Provision of suitable and sufficient fire extinguishers appropriate to identified risks.
- Implementation of fire watch procedures where required.
- Immediate reporting of fire hazards or defective fire protection systems.
- Protection and reinstatement of fire-rated ductwork, fire dampers, and compartmentation measures.

Hot works shall not commence without formal authorisation, confirmation of control measures, and appropriate firefighting equipment in place. Where required, post-work fire checks shall be conducted to ensure no smouldering materials or ignition sources remain.

First Aid Provision

First aid arrangements shall comply with statutory requirements and reflect the nature of works undertaken. The Company shall ensure:

- Adequate numbers of trained first aiders are available or accessible.
- First aid kits are maintained, accessible, and suitably stocked.
- Accident books are available for recording injuries.
- Clear procedures are established for contacting emergency services.

Where working on Principal Contractor sites, Concept Management Group Ltd shall confirm the location of site first aid facilities and emergency response arrangements during induction.

SIGNATORY ACTION REQUIREMENT - EMERGENCY SITUATION

In the event of fire, serious injury, structural failure, hazardous release, or other emergency situation, all personnel must:

1. Raise the alarm immediately using the designated site procedure.
2. Cease work and make plant or equipment safe where it is reasonably practicable to do so without increasing risk.
3. Evacuate promptly via the nearest safe route.



4. Report directly to the designated assembly point and await further instruction.
5. Refrain from re-entering the site or affected area until formally authorised.

Under no circumstances shall individuals ignore alarms, delay evacuation unnecessarily, or attempt to manage incidents beyond their level of competence. The Directors shall ensure that emergency procedures are periodically reviewed and updated to reflect operational changes, lessons learned from incidents, and regulatory developments. Records of induction, fire briefings, and emergency arrangements shall be maintained as evidence of compliance.

By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they:

- Understand site emergency procedures and fire safety controls.
- Accept their obligation to comply fully with evacuation and reporting requirements.
- Acknowledge that failure to adhere to emergency procedures may result in disciplinary or contractual action.

References

1. Regulatory Reform (Fire Safety) Order 2005 – <https://www.legislation.gov.uk/ukSI/2005/1541>
2. HSE First Aid Guidance – <https://www.hse.gov.uk/firstaid>



SECTION 13 – MONITORING, AUDIT AND CONTINUOUS IMPROVEMENT

Concept Management Group Ltd recognises that the existence of documented policies and procedures does not in itself demonstrate compliance or effective control. Compliance must be actively verified through structured monitoring, systematic inspection, and proportionate audit processes. The Company therefore establishes and maintains a formal monitoring framework aligned with operational risk exposure, statutory duties, contractual requirements, andSSIP core criteria. Monitoring is designed not merely to detect non-conformance, but to drive continual improvement, reinforce behavioural standards, and ensure that risk control measures remain effective throughout the lifecycle of each project.

Active Monitoring

Active monitoring shall be undertaken through periodic site inspections conducted by supervisors, managers, or appointed competent representatives. The frequency and scope of inspections shall be proportionate to:

- The scale and complexity of the works.
- The presence of high-risk activities.
- Subcontractor performance history.
- Incident trends or emerging risks.
- Client or Principal Contractor requirements.

Inspections shall assess, as appropriate:

- Compliance with approved risk assessments and method statements.
- Adherence to Permit to Work conditions.
- Safe use and condition of plant, equipment, and access systems.
- Environmental protection controls.
- Fire safety and emergency arrangements.
- Welfare provisions.
- Behavioural safety standards and housekeeping.
- Competency and training records where relevant.

Findings shall be documented in written or digital form. Where deficiencies are identified, corrective actions shall be assigned with defined timescales and responsible persons. Close-out of actions shall be tracked and verified.

Reactive Monitoring

Reactive monitoring shall occur following incidents, near misses, complaints, enforcement notices, or identified trends. Lessons learned shall be integrated into revised risk assessments, briefings, and training where required.

Internal Audit

Where appropriate, formal internal audits may be conducted to assess management system effectiveness against:

- Duties imposed under the Construction (Design and Management) Regulations 2015.
- SSIP core criteria.
- Internal IMS requirements.
- Client-specific contractual obligations.

Audits shall be documented, and findings classified according to severity (e.g., observation, minor non-conformance, major non-conformance). Senior management shall review audit outcomes and ensure that corrective and preventative actions are implemented and monitored to completion.

The audit process is intended to strengthen compliance and commercial resilience, not to assign blame, except where deliberate or reckless non-compliance is identified.

Subcontractor Oversight

The Company reserves the right to conduct announced or unannounced inspections of Subcontractor, Labour Only, or Self-Employed operations. This includes review of documentation, competency evidence, safe systems of work, and site practices.



Refusal to cooperate with inspection or audit processes shall constitute a material breach of engagement and may result in suspension or termination of works.

SIGNATORY ACTION REQUIREMENT – AUDIT & INSPECTION

If requested to participate in inspection or audit, you must:

1. Provide honest, accurate, and complete information.
2. Produce requested documentation, certifications, or records without undue delay.
3. Facilitate access to relevant work areas and personnel.
4. Implement corrective actions within specified timescales where deficiencies are identified.

Failure to cooperate may result in immediate removal from site and may affect future engagement.

By signing the Main Signing Page of this Integrated Management System, the signatory confirms agreement to cooperate fully with all monitoring, inspection, and audit processes established by the Company.

References

1. CDM 2015 – <https://www.legislation.gov.uk/ukxi/2015/51>
2. SSIP Core Criteria – <https://SSIP.org.uk>



SECTION 14 – ENFORCEMENT, DISCIPLINARY AUTHORITY AND COMMERCIAL PROTECTION

Concept Management Group Ltd retains full authority to enforce compliance with the provisions of this Integrated Management System. Enforcement is necessary to protect statutory compliance, contractual performance, commercial reputation, and the safety of all persons affected by Company operations. The Company reserves the right to implement proportionate enforcement measures, including but not limited to:

- Verbal instruction or formal warning.
- Written warning.
- Suspension of works.
- Removal of individuals from site.
- Withholding of payment where contractually permissible.
- Termination of subcontract or engagement.
- Exclusion from future tender opportunities.

Enforcement decisions shall be proportionate to the nature, severity, and potential consequences of the breach. Repeated minor breaches may be treated as cumulative non-compliance.

Commercial Recovery and Cost Protection

Where breach of this IMS results in delay, regulatory enforcement, reputational damage, contractual penalty, or third-party claim, the Company reserves the right to recover associated costs from the responsible party, subject to contractual terms and applicable law.

Recoverable costs may include, but are not limited to:

- Legal fees and consultancy expenses.
- Remedial works and rectification costs.
- Additional supervision or management time.
- Liquidated damages or contractual penalties.
- Insurance excess payments.
- Costs arising from enforcement notices or improvement notices.

Nothing within this Integrated Management System shall limit, waive, or prejudice the Company's statutory rights, contractual remedies, or common law entitlements.

Director Protection

Directors and senior management shall exercise enforcement authority in good faith and in pursuit of statutory compliance and risk mitigation. Where appropriate governance systems, oversight mechanisms, and due diligence procedures are demonstrably in place, personal liability shall be assessed in accordance with statutory principles governing corporate accountability.

SIGNATORY ACTION REQUIREMENT – BREACH OR NON-COMPLIANCE

If you become aware that you or your organisation has breached this Integrated Management System, you must:

1. Notify the Company immediately.
2. Cease the affected work activity without delay.
3. Take reasonable steps to prevent further risk or damage.
4. Cooperate fully in remedial action and investigation.

Failure to self-report may aggravate enforcement action and may be treated as deliberate concealment.

By signing the Main Signing Page of this Integrated Management System, the signatory acknowledges that enforcement powers form part of the contractual framework governing engagement and accepts the Company's authority to apply proportionate corrective measures.

References

1. Health and Safety at Work etc. Act 1974 – <https://www.legislation.gov.uk/ukpga/1974/37>
2. Construction (Design and Management) Regulations 2015 – <https://www.legislation.gov.uk/uksi/2015/51>



FURTHER INFORMATION

The below has been provided as further information and additional INFORMATION should it be required.

This Declaration is made in favour of:

Concept Management Group Ltd

Company Number 14084549

Trading as "Concept Management Group"
(Hereafter referred to as "the Company")



SECTION 15 – FURTHER INFORMATION (Risk Assessment and Management)

Concept Management Group Ltd recognises that effective risk assessment and risk management cannot operate independently of adequate training and demonstrable competence. The Company therefore requires that all personnel engaged in its operations — including employees, subcontractors, labour-only and self-employed operatives — possess and maintain health and safety training appropriate to the nature, complexity and risk profile of the work undertaken. Training shall be aligned with the requirements of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, and other applicable legislation including, where relevant, the Provision and Use of Work Equipment Regulations (PUWER), the Control of Substances Hazardous to Health Regulations (COSHH), the Work at Height Regulations, and other task-specific statutory instruments. Instruction shall address both general workplace safety principles and the specific hazards identified through risk assessment processes.

Risk assessments shall inform training requirements. Where risk assessments identify specific hazards, corresponding training, briefing or competency verification shall be implemented proportionately. Training may include formal classroom instruction, toolbox talks, practical demonstration, supervised work experience, online modules or structured competency assessment, depending upon the level of risk involved. Refresher training shall be undertaken where required by legislation, industry standards, manufacturer guidance, changes in working methods, incident investigation findings, or where supervisory review indicates declining standards. The objective of refresher training is to ensure that knowledge remains current and that risk controls remain effective in practice rather than theory.

The Company maintains records of training undertaken so far as reasonably practicable. However, responsibility for maintaining lawful competence remains with the individual and, where applicable, the supplying subcontractor. The existence of this policy shall not be construed as a guarantee that every individual has received every conceivable training intervention; rather, it establishes the structured framework through which competence is assessed, maintained and monitored. Supervisors and managers are responsible for identifying training needs and intervening where competency concerns arise. Individuals are responsible for disclosing limitations in their knowledge or certification and for refraining from undertaking tasks for which they are not adequately trained. Nothing within this section shall operate to transfer statutory duties from individuals or subcontracting entities to the Company. Risk management is a shared obligation, and compliance requires active participation by all parties engaged in the work.

By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand the relationship between risk assessment, training and competence, accept personal responsibility for maintaining lawful capability, and agree to comply with the training and risk management principles set out herein.

OVERARCHING LEGAL INTERPRETATION AND GOVERNANCE CLAUSE

This Integrated Management System is intended to establish structured governance, statutory compliance and risk control arrangements proportionate to the nature and scale of Concept Management Group Ltd's operations. The provisions contained herein shall be interpreted in a manner consistent with applicable legislation, recognised industry standards and the principle of reducing risk so far as is reasonably practicable. Nothing within this document shall be construed as creating obligations beyond those imposed by statute or contract, nor shall any provision be interpreted as transferring statutory duties from individuals, subcontractors or other legally responsible parties to the Company except where expressly agreed in writing. The existence of policies, procedures, templates or guidance within this Integrated Management System does not remove the continuing obligation upon each individual and subcontracting entity to exercise reasonable care, professional judgement and lawful conduct. Where any provision of this Integrated Management System is found to be ambiguous, invalid or unenforceable, such provision shall be construed so as to give effect to its lawful intent where possible, or severed pro tanto, and the remainder of the document shall continue in full force and effect. This Integrated Management System represents the Company's documented framework for compliance and due diligence. Isolated deviation, administrative omission or procedural oversight shall not, in itself, invalidate the existence of the system where reasonable steps have been taken to implement, monitor and enforce its provisions.



SECTION 16 – FURTHER INFORMATION (Emergency Procedures)

Concept Management Group Ltd recognises that effective emergency planning is a statutory requirement and a critical component of risk management. The Company shall ensure that proportionate emergency procedures are established and communicated to manage foreseeable risks arising from fire, hazardous substance release, structural instability, serious injury, and other site-specific emergencies. Emergency arrangements shall comply with the Management of Health and Safety at Work Regulations 1999, the Regulatory Reform (Fire Safety) Order 2005, and other applicable legislation. Emergency procedures shall be appropriate to the scale and risk profile of the project and shall form part of the planning and risk assessment process prior to commencement of works.

Evacuation routes shall be clearly identified and kept unobstructed at all times. Emergency exits shall remain accessible, and assembly points shall be designated in accordance with site-specific requirements. Where under the control of a Principal Contractor, the Company shall review and comply with the site-wide emergency arrangements and ensure that personnel are informed of relevant procedures. Where reasonably practicable, emergency drills or rehearsals shall be undertaken on projects of sufficient duration or complexity to warrant testing of arrangements. All personnel shall receive instruction regarding emergency signals, evacuation routes, reporting procedures and communication protocols during induction or site briefing.

Designated fire marshals, first-aid personnel or emergency coordinators shall be appointed where required by project risk assessment or statutory obligation. First-aid kits, fire detection systems, alarms and firefighting equipment shall be maintained in serviceable condition and inspected at appropriate intervals. Firefighting equipment shall be suitable for the identified risks and located in accessible positions. Procedures for responding to chemical spills or hazardous substance release shall comply with COSHH requirements. Appropriate containment materials, spill kits and personal protective equipment shall be made available where risk assessment identifies the need. Personnel shall be instructed in the safe containment and reporting of spills. Significant environmental or safety incidents shall be reported immediately to supervision and escalated in accordance with Company procedures.

While the Company establishes structured emergency arrangements, effective response relies upon the active cooperation of all personnel. Individuals must follow emergency instructions, evacuate when required, and refrain from re-entering affected areas until authorised. No person shall interfere with emergency equipment or obstruct evacuation routes. Emergency procedures shall be subject to periodic review and updated where operational changes, incident investigations, legislative amendments or audit findings indicate a need for improvement. The existence of documented procedures forms part of the Company's due diligence framework; however, compliance requires active participation by all persons engaged in the works.

By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand the emergency procedures framework, accept their obligation to comply with emergency instructions, and acknowledge that failure to follow emergency procedures may result in disciplinary or contractual action.

Crisis Escalation and Regulatory Notification Clause

In the event of a serious incident, dangerous occurrence, significant environmental event, structural failure, fire, major injury, or other circumstance reasonably likely to attract regulatory or emergency service involvement, the Company shall implement proportionate escalation procedures appropriate to the nature and severity of the event. Supervisory personnel shall immediately secure the area where reasonably practicable, ensure emergency services are contacted where required, and notify Company management without undue delay. Senior management shall determine whether statutory notification obligations arise under applicable legislation, including but not limited to RIDDOR, fire safety legislation, environmental reporting duties or other regulatory requirements.

Only authorised persons shall communicate with enforcing authorities, insurers, clients or media representatives on behalf of the Company. No subcontractor, labour-only or self-employed operative shall make statements, admissions or representations regarding liability or causation without express authority. The existence of this escalation framework does not impose strict liability upon the Company for unforeseen events, nor does it guarantee prevention of all incidents. Its purpose is to demonstrate structured governance and timely response consistent with statutory duties and the principle of reducing risk so far as reasonably practicable.

All personnel remain individually responsible for reporting incidents promptly and cooperating fully with investigation and regulatory processes.



SECTION 17 – FURTHER INFORMATION (Incident Reporting and Investigation)

Concept Management Group Ltd recognises that timely reporting and proportionate investigation of incidents are essential components of statutory compliance, effective risk management and organisational due diligence. The Company shall operate a structured incident reporting and investigation framework aligned with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) and other applicable legislation. All accidents, injuries, occupational ill-health cases, near misses, dangerous occurrences, property damage events and unsafe conditions must be reported immediately to supervision or Company management. Prompt reporting is mandatory and forms part of each individual's statutory duty under health and safety legislation. Failure to report a known incident or unsafe condition may constitute misconduct and may result in disciplinary or contractual action.

Incidents shall be investigated proportionately to their severity and potential consequence. The purpose of investigation is to identify immediate, underlying and root causes, evaluate the adequacy of risk assessments and control measures, and implement corrective and preventative actions to reduce the likelihood of recurrence. Investigations may include witness interviews, review of risk assessments and method statements, inspection of equipment, examination of permit documentation and assessment of supervisory arrangements. Where an incident meets statutory reporting thresholds, the Company shall ensure that notification is made to the appropriate enforcing authority within the prescribed timescales. Determination of reportability shall be made by authorised management personnel. Only designated representatives of the Company may submit statutory reports or communicate formally with regulatory authorities.

Corrective actions arising from investigations shall be implemented without undue delay and monitored to completion. Lessons learned shall, where appropriate, be communicated to relevant personnel and incorporated into updated risk assessments, training programmes or method statements. The existence of this reporting and investigation framework forms part of the Company's due diligence system. While reasonable steps are taken to promote full reporting and investigation of incidents, effective implementation relies upon the cooperation and integrity of all personnel. Individuals remain personally responsible for reporting incidents promptly and for participating honestly in investigation processes.

Nothing within this section shall operate to transfer statutory duties from individuals or subcontracting entities to the Company beyond those imposed by law. Subcontractors, labour-only and self-employed operatives remain responsible for incidents arising from their own acts or omissions and must cooperate fully with any investigation. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand their obligation to report incidents immediately, cooperate fully in investigations, and comply with corrective measures implemented as a result of such investigations.

Non-Admission of Liability and Investigation Integrity Clause

All internal incident reports, witness statements, investigation findings and corrective action records are prepared for the purpose of statutory compliance, risk management and prevention of recurrence. Such documentation is intended to support health and safety governance and shall not, in itself, constitute an admission of liability, negligence, fault or breach of statutory duty by Concept Management Group Ltd or its Directors. Only authorised representatives of the Company may make formal statements to regulatory authorities, insurers, clients or third parties concerning causation, responsibility or liability. Subcontractors, labour-only and self-employed operatives shall not provide statements on behalf of the Company, admit liability, or enter into settlement discussions without express written authority.

The investigation process is conducted in good faith to identify immediate and underlying causes. Conclusions reached as part of internal review are risk management tools and shall not be interpreted as binding legal determinations of liability. Nothing within this clause restricts the Company's obligation to cooperate fully with enforcing authorities, comply with statutory reporting requirements, or provide factual information where lawfully required.



SECTION 18 – FURTHER INFORMATION (Personal Protective Equipment (PPE))

Concept Management Group Ltd recognises that Personal Protective Equipment (PPE) forms a residual control measure within the hierarchy of risk control and shall be used where risks cannot be eliminated or adequately controlled by engineering, collective or administrative measures. PPE requirements shall comply with the Personal Protective Equipment at Work Regulations 1992 (as amended) and any applicable project-specific requirements. PPE shall be selected based upon risk assessment and the specific hazards identified within the work activity. Such equipment may include, where relevant, safety helmets, eye protection, gloves, respiratory protective equipment (RPE), hearing protection, high-visibility clothing, protective footwear, and task-specific protective garments. PPE shall be suitable for the risks involved, compatible with other equipment worn, and appropriate for the working environment.

Where the Company is responsible for provision of PPE, such equipment shall be maintained in serviceable condition so far as reasonably practicable. PPE shall be inspected prior to use, and defective, damaged or unsuitable equipment shall not be used. Individuals must report damaged, defective or missing PPE immediately to supervision. Training and instruction shall be provided proportionate to the risk associated with the equipment, particularly in respect of respiratory protection, fall protection equipment, or other specialist PPE. Users must understand the limitations of PPE and the circumstances in which it must be worn. PPE shall not be modified, misused or deliberately avoided.

The requirement to wear designated PPE on site is mandatory. Failure to wear required PPE may result in removal from the work area or site and may constitute disciplinary or contractual breach. While the Company establishes this PPE framework as part of its statutory compliance system, effective protection relies upon individual adherence. Each person engaged in the works remains personally responsible for using PPE correctly and in accordance with training and instruction. The existence of this policy does not transfer personal responsibility for safe conduct to the Company. Subcontractors, labour-only and self-employed operatives remain responsible for ensuring that appropriate PPE is worn by personnel under their control where not expressly provided by the Company. Responsibility for safe execution of works remains with the party undertaking those works.

Respiratory Protective Equipment (RPE) and Fibre/Dust Exposure Control Clause

Concept Management Group Ltd recognises that facilities management, landscaping, cleaning, maintenance and associated works can generate airborne dust, aerosols, fumes, pollen, fibres and particulate matter capable of causing respiratory irritation, occupational asthma, long-term lung damage or other adverse health effects. The Company therefore establishes enhanced control measures for respiratory protection in addition to general PPE requirements. Respiratory Protective Equipment (RPE) shall be provided and used where risk assessment identifies potential exposure to airborne contaminants, including but not limited to cutting and drilling dust, cleaning aerosols, fine particulates, organic dusts and pollen, fumes from products, and residual dust within plant rooms, service areas, stores, external work zones or ceiling voids. RPE selection shall be suitable for the specific hazard identified and shall meet relevant British or European Standards.

The selection of RPE shall consider:

- The nature and concentration of airborne contaminants
- Duration and frequency of exposure
- Compatibility with other PPE
- Facial fit and user characteristics
- Environmental conditions including confined or poorly ventilated spaces

Where tight-fitting RPE (including disposable FFP3 masks or half-mask respirators) is required, face fit testing shall be carried out in accordance with HSE guidance prior to use. Personnel who have not been face-fit tested shall not use tight-fitting RPE as a primary control measure. Clean-shaven facial areas are required where tight-fitting RPE is worn to ensure an effective seal.

RPE shall be regarded as a supplementary control measure within the hierarchy of control. Wherever reasonably practicable, engineering and collective controls shall be prioritised, including local extraction, dust suppression techniques, controlled cutting methods, pre-fabrication off-site, or ventilation of enclosed areas. Dry sweeping of fine dust or contaminated debris shall be avoided where practicable and vacuum systems fitted with appropriate filtration shall be used.

RPE shall be inspected prior to each use. Reusable respirators shall be cleaned, maintained and stored in hygienic conditions. Filters shall be replaced in accordance with manufacturer guidance or sooner if contamination, resistance or damage is identified. Defective RPE shall not be used under any circumstances.

Personnel shall receive instruction on:

- Correct fitting and seal checking
- Limitations of protection
- Maintenance and storage requirements
- Recognition of exposure symptoms
- Reporting of respiratory discomfort or failure of equipment

Any individual experiencing respiratory irritation, breathing difficulty, dizziness or suspected overexposure must cease work immediately and notify supervision. Supervisors shall reassess the working environment and implement additional control measures where necessary. Where maintenance, cleaning, M&E or other intrusive FM works interface with older buildings or legacy materials, the presence of asbestos-containing materials shall be considered in planning and risk assessment. No intrusive work shall proceed where asbestos risk has not been appropriately assessed and controlled in accordance with statutory requirements. Subcontractors, labour-only and self-employed operatives remain responsible for complying with RPE requirements and ensuring that personnel under their control use suitable respiratory protection. The Company's provision or verification of RPE does not transfer responsibility for safe execution of works.



The Company shall retain records of face-fit testing and RPE provision so far as reasonably practicable as part of its health surveillance and due diligence framework. RPE control forms part of the Company's wider occupational health risk management strategy. Failure to use required respiratory protection or deliberate misuse of RPE shall constitute a serious breach of Company policy and may result in removal from site. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand PPE requirements, accept their obligation to use equipment correctly, and acknowledge that non-compliance may result in removal from site or contractual action.

Occupational Health Surveillance and Exposure Monitoring Statement

Concept Management Group Ltd recognises that certain facilities management, landscaping, cleaning, property maintenance and M&E activities may give rise to health risks which are not immediately apparent but may develop over time, including respiratory conditions, skin irritation, musculoskeletal disorders and noise-induced hearing damage. The Company therefore adopts a proportionate occupational health approach aligned with the Control of Substances Hazardous to Health Regulations (COSHH), the Control of Noise at Work Regulations and other relevant statutory provisions. Where risk assessment identifies foreseeable exposure to hazardous substances, airborne fibres, dust, excessive noise or other occupational health hazards, the Company shall determine whether health surveillance or exposure monitoring is required so far as reasonably practicable. This may include respiratory health questionnaires, face-fit testing records, skin surveillance, noise exposure review or referral to occupational health providers where appropriate.

Health surveillance shall be proportionate to the nature, frequency and intensity of exposure and shall not exceed what is reasonably necessary under applicable legislation. Records of health surveillance, where undertaken, shall be maintained confidentially and in accordance with data protection requirements. Such records form part of the Company's due diligence framework and may be relied upon as evidence of compliance. The primary objective of health surveillance is early identification of adverse health effects so that control measures may be reviewed and strengthened. It does not constitute a guarantee against illness nor transfer responsibility for personal health disclosure from the individual to the Company.

Personnel must promptly report symptoms such as persistent coughing, breathing difficulty, skin irritation, hearing changes or other work-related health concerns to supervision. Failure to disclose relevant health conditions or symptoms that may affect safe working may compromise risk control and shall be addressed accordingly. Subcontractors, labour-only and self-employed operatives remain responsible for cooperating with health surveillance measures where required and for ensuring that their own occupational health arrangements are adequate where exposure arises from works under their control. The Company's implementation of health monitoring measures does not remove statutory duties from independent parties. The Directors maintain oversight of occupational health risk management as part of the Company's broader duty to reduce risk so far as is reasonably practicable. Where proportionate systems, supervision and monitoring are in place, responsibility for individual health outcomes shall be assessed in accordance with statutory principles governing employer and contractor liability.



SECTION 19 – FURTHER INFORMATION (Workplace Safety Procedures)

Concept Management Group Ltd establishes and maintains structured workplace safety procedures in accordance with the Health and Safety at Work etc. Act 1974 and associated statutory instruments. These procedures form part of the Company's operational control system and are designed to ensure that work activities are planned, supervised and executed in a manner that reduces risk so far as is reasonably practicable. Workplace safety procedures shall address, as appropriate to the nature of the works, safe operation of plant and equipment, handling and storage of materials, control of hazardous substances, access and egress arrangements, working at height, lifting activities, manual handling, housekeeping standards, traffic management, and coordination between trades. These procedures are not theoretical guidance but mandatory operational controls.

All equipment provided for use at work shall comply with the Provision and Use of Work Equipment Regulations (PUWER). Equipment shall be suitable for its intended purpose, maintained in safe condition, and used only by persons who have received appropriate instruction or training. Where lifting equipment or lifting accessories are used, compliance with the Lifting Operations and Lifting Equipment Regulations (LOLER) shall be ensured, including examination and certification where required. Hazardous substances shall be assessed and controlled in accordance with the Control of Substances Hazardous to Health Regulations (COSHH). Safety data sheets shall be reviewed, and control measures implemented as identified by risk assessment. Materials shall not be introduced to site without appropriate evaluation of associated risks.

Good housekeeping shall be treated as a core safety control. Work areas shall be kept reasonably free from excessive waste, debris and obstruction. Access routes, fire exits and escape routes must remain clear at all times. Poor housekeeping shall be treated as a safety non-conformance and addressed without delay. Workplace safety procedures shall be reviewed periodically and whenever operational changes occur, including introduction of new plant, materials, work methods or site conditions. Revisions shall be communicated to affected personnel through briefing or supervision. The Company shall undertake proportionate monitoring through site inspections, supervisory oversight and internal audit processes to verify implementation of workplace safety procedures. Where deficiencies are identified, corrective action shall be implemented and recorded.

While the Company establishes this structured safety framework, effective implementation relies upon active participation by all personnel. Individuals are required to follow established procedures, cooperate with supervision, and report hazards or unsafe practices without delay. Failure to comply with workplace safety procedures may result in removal from site or contractual action. Subcontractors, labour-only and self-employed operatives remain responsible for ensuring that works under their control are executed safely and in compliance with statutory duties. The Company's monitoring or inspection of workplace safety does not transfer responsibility for safe execution of tasks to the Company. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand workplace safety procedures form mandatory operational requirements and accept their obligation to comply with them.



SECTION 20 – FURTHER INFORMATION (Manual Handling and Ergonomics)

Concept Management Group Ltd recognises that manual handling activities form a routine component of facilities management, landscaping, commercial cleaning, property maintenance and M&E works and may give rise to musculoskeletal injuries if not properly assessed and controlled. The Company shall manage manual handling risks in accordance with the Manual Handling Operations Regulations 1992 and the principle of reducing risk so far as is reasonably practicable. Manual handling operations shall be avoided where reasonably practicable. Where avoidance is not feasible, tasks shall be assessed and controlled through structured risk assessment. Consideration shall be given to the nature of the load, weight, size, shape, stability, frequency of handling, working environment, access constraints, individual capability and any additional factors increasing risk. Mechanical handling aids, lifting equipment, trolleys, hoists, team lifting arrangements or alternative working methods shall be utilised where reasonably practicable to reduce strain and repetitive load. Manual handling shall not be used as a default method where safer alternatives are available. Planning of works shall consider delivery locations, storage positioning, access routes and sequencing to minimise unnecessary handling.

Training and instruction shall be provided proportionate to the risk profile of the tasks undertaken. This may include safe lifting principles, load assessment techniques, team coordination, recognition of hazardous postures, and awareness of repetitive strain risks. However, training alone shall not be relied upon as the primary control measure where physical risk remains significant. Personnel must assess loads before lifting and shall not attempt to lift or move objects beyond their capability. Where doubt exists regarding safe handling, assistance must be sought. Individuals are required to report unsafe conditions, excessive load weights, repetitive strain concerns or emerging discomfort without delay. Supervisors shall review and adjust control measures where concerns are raised.

Where FM, cleaning, landscaping, maintenance or M&E works involve awkward access, overhead activity, plant-room congestion, external terrain or confined environments, manual handling risk shall be reviewed as part of method statement planning. Repetitive cutting, bending, overhead fixing and constrained working positions shall be assessed and managed to reduce strain exposure. Ergonomic considerations shall also apply to office-based or administrative functions undertaken by the Company. Display screen equipment, workstation layout and repetitive tasks shall be reviewed proportionately to reduce risk of strain injuries. Individuals must report discomfort or workstation concerns so that reasonable adjustments may be considered.

The Company shall undertake proportionate monitoring of manual handling practices through supervision and inspection. Persistent unsafe lifting practices or disregard of mechanical aids may result in corrective instruction or removal from task. Subcontractors, labour-only and self-employed operatives remain responsible for ensuring that works under their control are planned and executed safely, including appropriate manual handling arrangements. The Company's review of risk assessments or method statements does not transfer responsibility for safe execution of manual handling activities. The existence of this manual handling framework forms part of the Company's due diligence system. While reasonable steps are taken to identify and control risk, effective prevention of injury depends upon cooperation, personal judgement and adherence to safe systems of work. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand manual handling requirements, accept responsibility for safe lifting practices, and acknowledge that failure to follow safe procedures may result in removal from task or site.



SECTION 21 – FURTHER INFORMATION (Health and Wellbeing)

Concept Management Group Ltd recognises that health and safety extends beyond immediate physical hazards and includes consideration of mental wellbeing, fatigue management and general workplace welfare. The Company is committed to promoting a working environment that supports safe performance, professional conduct and reasonable wellbeing standards consistent with its statutory duties. The Company acknowledges its obligations under the Health and Safety at Work etc. Act 1974 to safeguard, so far as is reasonably practicable, the health, safety and welfare of persons affected by its operations. This includes consideration of workload planning, working hours, rest breaks, welfare facilities and supervisory oversight proportionate to the nature of the works.

Where reasonably practicable, management shall seek to organise work in a manner that avoids excessive fatigue, unmanaged stress or unsafe pressure arising from programme demands. Adequate welfare facilities, including access to drinking water and sanitary provisions, shall be maintained in accordance with statutory requirements and project-specific arrangements. The Company recognises that construction environments can present pressures relating to programme, access constraints, physical demands and commercial performance. Supervisors are expected to remain alert to observable signs of fatigue, distress or behavioural change that may present safety risk. Where concerns are reasonably identified, appropriate discussion or referral may be undertaken.

Where available and proportionate to operational scale, the Company may provide access to wellbeing information or external support resources. Such resources, where offered, are intended as supportive mechanisms and do not constitute medical services or create a contractual entitlement to ongoing counselling provision. Individuals remain responsible for managing their own health and fitness for work. Personnel must present themselves fit to undertake assigned duties and must disclose any condition, medication or circumstance that may reasonably affect their ability to work safely. Failure to do so may compromise risk control and shall be addressed appropriately.

Mental health awareness may form part of supervisory training where proportionate. However, supervisors are not expected to provide clinical assessment or medical intervention. The Company's role is to provide a structured and reasonably supportive working environment; ultimate responsibility for personal health management remains with the individual. The existence of this wellbeing framework forms part of the Company's broader duty of care system. It does not guarantee prevention of stress, illness or personal hardship, nor does it transfer personal responsibility for health management from the individual to the Company. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand the Company's wellbeing framework, acknowledge their personal responsibility to remain fit for work, and agree to raise concerns where health or fatigue may affect safety.



SECTION 22 – FURTHER INFORMATION (Occupational Health)

Concept Management Group Ltd recognises that certain facilities management, landscaping, cleaning, property maintenance and M&E activities may expose personnel to occupational health risks, including airborne fibres, dust, hazardous substances, excessive noise, hand-arm vibration and other environmental stressors. The Company shall manage occupational health risks in accordance with the Control of Substances Hazardous to Health Regulations 2002 (COSHH), the Control of Noise at Work Regulations 2005, the Control of Vibration at Work Regulations 2005, and other applicable statutory requirements. Occupational health risk management shall begin with structured risk assessment. Where foreseeable exposure to hazardous substances, noise or vibration is identified, control measures shall be implemented in accordance with the hierarchy of control. Engineering controls, equipment selection, task design and exposure reduction methods shall be prioritised before reliance upon personal protective equipment.

Exposure levels shall be reduced so far as is reasonably practicable. Where exposure action values are likely to be approached or exceeded, additional controls shall be implemented, which may include alternative working methods, equipment substitution, time limitation of exposure, enhanced supervision or task rotation. Where legislation requires or risk assessment indicates the need, health surveillance shall be implemented proportionately. This may include audiometric testing for noise exposure, vibration risk assessment and monitoring, respiratory health review where fibre or dust exposure exists, and skin surveillance where relevant. Health surveillance shall be conducted at appropriate intervals and reviewed periodically.

The purpose of health surveillance is early identification of adverse health effects so that control measures can be reviewed and strengthened. It does not constitute a guarantee against illness nor an assumption of medical responsibility by the Company. Health surveillance records, where maintained, shall be treated as confidential and managed in accordance with data protection legislation. Records may be retained as evidence of statutory compliance and due diligence. Personnel must report symptoms that may reasonably be associated with occupational exposure, including but not limited to hearing deterioration, tingling or numbness in hands, respiratory irritation, persistent coughing, or unusual fatigue related to vibration exposure. Early reporting allows reassessment of risk controls and prevention of further exposure. Where occupational illness is diagnosed and meets statutory reporting criteria, the Company shall comply with RIDDOR reporting obligations. Determination of reportability shall be made by authorised management personnel.

Subcontractors, labour-only and self-employed operatives remain responsible for ensuring that occupational health risks arising from works under their control are properly assessed and managed. The Company's oversight or review of documentation shall not transfer statutory duties relating to exposure control or health monitoring. The Company's occupational health framework forms part of its broader due diligence system. While reasonable and proportionate measures are implemented to control risk, ultimate compliance requires cooperation, disclosure and adherence to safe systems of work by all personnel. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand occupational health obligations, accept responsibility for cooperating with exposure controls and surveillance measures, and acknowledge that failure to comply may result in removal from task or site.



SECTION 23 – FURTHER INFORMATION (Work at Height)

Concept Management Group Ltd recognises that work at height presents a significant risk of serious injury or fatality and shall be planned, supervised and executed in accordance with the Work at Height Regulations 2005 and the principle of reducing risk so far as is reasonably practicable. Work at height shall be avoided where reasonably practicable. Where avoidance is not feasible, tasks shall be subject to structured risk assessment and method statement planning prior to commencement. Planning shall consider access arrangements, stability of working platforms, edge protection, fragile surfaces, environmental conditions, load bearing capacity, rescue arrangements and competence of personnel. In accordance with the hierarchy of control, collective protective measures such as guardrails, scaffold systems, edge protection, working platforms and mobile elevated work platforms (MEWPs) shall be prioritised over personal fall protection. Personal fall protection equipment, including harnesses and lanyards, shall only be used where collective measures are not reasonably practicable or as supplementary protection.

All equipment used for work at height shall be suitable for its intended purpose, maintained in safe condition and subject to inspection at appropriate intervals. Scaffolding, mobile towers, ladders and MEWPs shall be used only in accordance with manufacturer guidance and industry best practice. Improvised access arrangements are strictly prohibited. Ladders shall be used only for short-duration, low-risk tasks where safer alternatives are not reasonably practicable. Ladders shall be secured where possible and used on stable surfaces. Personnel must maintain three points of contact and shall not overreach.

Training and instruction shall be provided proportionate to the equipment and risk involved. Operatives using scaffold towers, MEWPs or harness systems must be competent and, where applicable, hold recognised certification. Supervisory personnel shall verify competence before permitting work at height to proceed. Where personal fall protection systems are used, a site-specific rescue plan must be established prior to commencement. Reliance upon emergency services alone shall not be considered an adequate rescue plan. Rescue arrangements must be realistic, proportionate and understood by those involved.

Work at height shall not proceed during adverse weather conditions where safety may be compromised, including high winds, ice or poor visibility. Supervisors shall monitor work at height activities proportionately to risk. However, individual operatives retain personal responsibility for complying with safe systems of work and must cease work immediately if conditions become unsafe. Subcontractors, labour-only and self-employed operatives remain responsible for planning and executing work at height safely under their control. The Company's review of risk assessments or method statements does not transfer statutory duties for fall prevention to the Company.

The Company's work at height framework forms part of its structured due diligence system. While reasonable and proportionate controls are implemented, the effectiveness of fall prevention relies upon adherence to planning, supervision and individual compliance. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand work at height requirements, accept responsibility for complying with safe systems of work, and acknowledge that non-compliance may result in immediate cessation of activity or removal from site.

Additional Work at Height Governance and Oversight Provisions

Work at height activities shall be subject to task-specific planning and authorisation prior to commencement. No person shall undertake work at height unless suitable access equipment has been selected based upon risk assessment and confirmed as appropriate for the duration and complexity of the task. Ad hoc or convenience-based access methods are strictly prohibited. Pre-use inspection of access equipment shall be undertaken by a competent person. Scaffold towers, ladders, podium steps, MEWPs and harness systems shall be visually inspected prior to use and formally inspected at intervals required by legislation or manufacturer guidance. Defects shall be reported immediately, and defective equipment shall be removed from service without delay. Where third-party scaffold systems are used, confirmation of inspection and handover certification shall be obtained prior to use. No person shall alter, remove components from, or interfere with scaffold structures unless authorised and competent to do so.

Fragile surfaces, roof works and ceiling void access present enhanced risk and shall require specific assessment. Where fragile materials are present, suitable crawling boards, fall prevention systems or alternative working methods must be implemented. Access to roof areas shall not proceed without confirmation of load-bearing capacity. Where guardrails or collective protection are temporarily removed to facilitate installation works, they must be reinstated as soon as reasonably practicable. Temporary removal shall not occur without supervisory awareness and alternative fall protection in place. The Company expects supervisory personnel to conduct proportionate monitoring of work at height activities; however, operational responsibility for safe execution remains with those undertaking the work. The Company cannot and does not maintain continuous physical oversight of all elevated activities. Accordingly, all operatives are required to exercise professional judgement and cease work immediately where conditions become unsafe.

Where subcontractors control the work area, they remain wholly responsible for ensuring compliance with work at height legislation, rescue planning, equipment suitability and supervision. The Company's oversight, review of documentation or periodic inspection does not transfer statutory duty for fall prevention or rescue provision. Records of work at height training, certification and inspection may be requested at any time. Failure to provide reasonable evidence of competence or equipment compliance may result in suspension of works pending INFORMATION. Repeated unsafe practices, bypassing of fall protection systems, failure to implement rescue arrangements or misuse of access equipment shall be treated as serious breach of Company policy and may result in removal from site and termination of engagement. The Company's work at height control framework forms part of its due diligence defence and demonstrates structured governance of elevated risk activities. Responsibility for compliance with safe systems of work remains with the individual and, where applicable, the subcontracting entity undertaking the task.



SECTION 24 – FURTHER INFORMATION (Subcontractors and Visitors)

Concept Management Group Ltd recognises that effective management of subcontractors, labour-only operatives and visitors is essential to maintaining statutory compliance and protecting operational safety. All subcontractors and visitors entering areas under the Company's control shall comply with site-specific safety requirements and lawful instructions issued for risk management purposes. Prior to engagement, subcontractors and labour-only operatives may be required to provide evidence of competence proportionate to the nature of the works undertaken. Such evidence may include risk assessments, method statements, training certification, insurance documentation and relevant accreditation. The Company's review of such documentation is undertaken for due diligence purposes and shall not transfer statutory responsibility for safe execution of works to the Company.

Subcontractors remain independent contractors and retain full responsibility for planning, supervising and executing works under their control in compliance with applicable legislation, including but not limited to PUWER, LOLER, COSHH and the Work at Height Regulations. The Company's monitoring, coordination or periodic inspection of works does not create an agency relationship nor transfer liability for the safe management of subcontracted activities. Where subcontractors introduce plant, equipment or hazardous substances to site, they remain responsible for ensuring suitability, maintenance, certification and lawful use. The Company reserves the right to request documentation verifying compliance and may suspend activities where reasonable concerns arise.

Visitors to areas under the Company's control shall receive appropriate site-specific information proportionate to the risk profile of the location. Visitors entering operational or construction zones may be required to attend a safety briefing, be accompanied where necessary and wear designated personal protective equipment. Visitors must comply with all safety signage and instructions provided.

The Company cannot maintain continuous supervision of subcontractor activities or visitor conduct. Accordingly, all subcontractors, labour-only operatives and visitors retain personal responsibility for complying with statutory duties and safe working practices. Regular monitoring and inspection may be undertaken proportionately to risk. Where unsafe practices are identified, the Company reserves the right to issue corrective instruction, restrict access, suspend works or remove individuals from site. The Company's subcontractor and visitor control framework forms part of its due diligence system and demonstrates structured governance of third-party risk. It does not constitute acceptance of liability for independent acts or omissions beyond those imposed by statute. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand the allocation of responsibility between the Company and independent parties and accept that compliance with site safety procedures is a mandatory condition of engagement or access.

Additional Subcontractor Governance and Control Provisions

All subcontractors, labour only, self-employed personnel shall ensure that personnel under their control are adequately supervised and that a competent person is available to manage their activities. The Company shall not be deemed to assume supervisory control over subcontractor employees unless expressly agreed in writing. Responsibility for day-to-day operational safety management remains with the subcontractor. Subcontractors labour only, self-employed personnel must not sub-let, or delegate works without prior written approval from the Company. Any approved secondary subcontracting shall not relieve the original subcontractor of responsibility for compliance with statutory duties or the requirements of this Integrated Management System.

Where works are undertaken in shared workspaces or in coordination with other trades, subcontractors labour only, self-employed personnel must cooperate and coordinate so far as reasonably practicable to ensure that their activities do not create foreseeable risk to others. Failure to coordinate may result in suspension of works. The Company reserves the right to require removal of any subcontractor labour only, self-employed personnel operative whose conduct, competence or behaviour gives rise to reasonable safety concern. Such removal shall not constitute acceptance of employment status or supervisory control but shall be an exercise of site safety authority.

Additional Visitor Control and Limitation of Liability

Visitors labour only, self-employed personnel entering operational areas do so on the basis that they will comply with safety instructions and remain within designated zones. Visitors must not interfere with equipment, plant, materials or work activities. Where visitors labour only, self-employed personnel fail to comply with safety instructions or behave in a manner that may create risk, the Company reserves the right to withdraw access immediately. The Company's provision of site briefing, induction or personal protective equipment to visitors shall not create an assumption of comprehensive supervision or duty beyond that imposed by law. Visitors labour only; self-employed personnel remain responsible for exercising reasonable care for their own safety.

Insurance and Indemnity Reinforcement

Subcontractors labour only, self-employed personnel shall maintain appropriate insurance cover, including public liability and employer's liability where applicable, for the duration of their engagement. Evidence of insurance may be requested at any time. Failure to maintain adequate insurance may result in suspension of works. Subcontractors labour only, self-employed personnel shall indemnify the Company against loss, damage, enforcement action, or third-party claims arising from breach of statutory duty, negligence or failure to comply with site safety requirements.



SECTION 25 – FURTHER INFORMATION (Machinery and Equipment Safety)

Concept Management Group Ltd shall ensure that machinery, plant and work equipment used in connection with its operations are selected, used and maintained in accordance with the Provision and Use of Work Equipment Regulations 1998 (PUWER) and other applicable statutory requirements. All work equipment shall be suitable for its intended purpose, appropriate for the working environment, and used only for the tasks for which it was designed. Equipment shall be maintained in a safe condition so far as reasonably practicable and subject to inspection at appropriate intervals based upon risk, frequency of use and manufacturer guidance. Pre-use checks shall be undertaken by the operator prior to operation. Where defects, excessive wear, missing guards, damaged cables, vibration abnormalities or malfunction are identified, the equipment shall be taken out of service immediately and reported to supervision. Defective equipment shall not be used under any circumstances.

Only trained and competent persons shall operate machinery. Authorisation to operate specific equipment may be restricted to individuals holding relevant certification or having received appropriate instruction. Supervisors shall verify competence prior to permitting operation. Safety guards, interlocks, emergency stop functions and protective devices shall not be removed, bypassed or tampered with. Any interference with safety mechanisms shall be treated as serious misconduct. During maintenance, repair, blade changes, clearing of blockages or adjustment of equipment, suitable isolation procedures shall be implemented. Lock-off and tag systems shall be applied where appropriate to prevent inadvertent energisation. Energy sources, including electrical, mechanical, hydraulic or pneumatic systems, must be isolated prior to intervention.

Where portable electrical equipment is used, it shall be suitable for site conditions and subject to inspection and testing in accordance with Company procedures and statutory guidance. Damaged leads, plugs or casings must result in immediate removal from service. Subcontractors, labour-only and self-employed operatives introducing plant or equipment to site remain responsible for ensuring such equipment complies with PUWER and is properly maintained, inspected and suitable for the intended use. The Company's inspection or oversight of equipment shall not transfer statutory duty for safe operation to the Company.

The Company reserves the right to prohibit the use of any machinery or equipment that is deemed unsafe, unsuitable or inadequately maintained. Suspension of equipment use shall not constitute acceptance of supervisory liability but shall be an exercise of site safety authority. The machinery and equipment control framework forms part of the Company's due diligence system. While reasonable and proportionate measures are implemented to ensure compliance, effective safety depends upon operator competence, proper maintenance and adherence to safe systems of work. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand machinery safety requirements, accept responsibility for safe operation, and acknowledge that

failure	to	comply	may	result	in	removal	from	task	or	site.
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SECTION 26 – FURTHER INFORMATION (Hazardous Substances and Chemical Safety (COSHH))

Concept Management Group Ltd recognises that facilities management, landscaping, cleaning, property maintenance and M&E activities may involve the use, storage or disturbance of substances hazardous to health. The Company shall manage such risks in accordance with the Control of Substances Hazardous to Health Regulations 2002 (COSHH) and the principle of preventing or adequately controlling exposure so far as is reasonably practicable. No hazardous substance shall be introduced to site without prior consideration of associated health risks. A suitable and sufficient COSHH assessment shall be undertaken proportionate to the nature and scale of exposure. Assessments shall identify hazardous properties, routes of exposure, control measures, emergency procedures and disposal requirements. Where reasonably practicable, hazardous substances shall be eliminated or substituted with less harmful alternatives. Where substitution is not feasible, exposure shall be controlled through engineering measures such as ventilation, local exhaust extraction, dust suppression, containment systems or controlled application methods before reliance is placed upon personal protective equipment.

Safety Data Sheets (SDS) shall be obtained for relevant substances and reviewed prior to use. Information from SDS documentation shall inform risk assessment, storage arrangements and emergency planning. Substances shall not be used in a manner inconsistent with manufacturer guidance. Hazardous substances shall be stored securely, appropriately labelled, and segregated where incompatibility may present risk. Storage shall minimise risk of leakage, fire, environmental contamination or unauthorised access. Where fibre, dust or vapour exposure is foreseeable, appropriate respiratory protective equipment and other PPE shall be provided in accordance with assessed risk. Personnel must comply with control measures specified within COSHH assessments and report any failure of controls immediately. Spill response arrangements shall be proportionate to the substances in use. Suitable spill kits and containment materials shall be made available where risk assessment identifies potential release. In the event of spill or accidental exposure, work shall cease and supervisory personnel shall be notified immediately. Significant incidents shall be escalated in accordance with Company emergency and reporting procedures.

Personnel shall receive instruction proportionate to the substances handled, including safe handling techniques, storage practices, recognition of symptoms of exposure and emergency response procedures. Where exposure monitoring or health surveillance is required under COSHH, such measures shall be implemented proportionately. Records, where maintained, shall form part of the Company's due diligence system and be managed in accordance with data protection legislation. Subcontractors, labour-only and self-employed operatives introducing hazardous substances to site remain responsible for ensuring that COSHH assessments are completed, control measures implemented and statutory duties complied with. The Company's review of documentation does not transfer legal responsibility for safe management of hazardous substances.

The Company's COSHH framework forms part of its structured occupational health governance system. While reasonable and proportionate measures are implemented to control exposure, effective compliance requires cooperation, supervision and adherence to specified controls by all personnel. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand hazardous substance control requirements, accept responsibility for complying with COSHH measures, and acknowledge that failure to do so may result in suspension of works or removal from site.



SECTION 27 - FURTHER INFORMATION (Vehicle and Transportation Safety)

Concept Management Group Ltd recognises that vehicle operations and material transportation present significant risk to employees, subcontractors, members of the public and other road users. The Company shall manage transport-related risks in accordance with the Road Traffic Act 1988, the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009, and other applicable statutory requirements. All drivers operating vehicles in connection with Company activities must hold a valid and appropriate driving licence for the class of vehicle operated. Where vehicles are used for transporting hazardous substances, compressed gases or other regulated materials, drivers must comply with applicable carriage requirements, including documentation, labelling and load security obligations. Vehicles used in connection with Company works shall be suitable for their intended purpose and maintained in a roadworthy condition so far as reasonably practicable. Regular servicing and inspection shall be undertaken in accordance with manufacturer guidance. Drivers must conduct basic pre-use checks, including tyres, lights, braking function, load security and obvious defects. Any faults affecting safe operation shall be reported immediately and the vehicle removed from service where necessary.

Loads shall be secured to prevent movement, spillage or imbalance during transit. Materials, tools, cleaning equipment, landscaping equipment, plant and consumables must be stored and restrained appropriately. Overloading of vehicles is strictly prohibited. Where vehicles operate within construction or shared work environments, traffic management arrangements shall be implemented proportionate to risk. This may include designated pedestrian routes, vehicle-only zones, speed restrictions, reversing protocols, use of banksmen where required, and clear signage. Reversing manoeuvres shall be minimised so far as reasonably practicable. Drivers must operate vehicles in a safe and lawful manner at all times. Use of mobile phones while driving, driving under the influence of alcohol or drugs, or reckless operation shall be treated as serious misconduct. Where subcontractors provide vehicles or transport materials under their control, they remain responsible for ensuring vehicle compliance, driver competence and lawful carriage of goods. The Company's coordination of site logistics shall not transfer statutory responsibility for vehicle safety to the Company. The Company cannot exercise continuous supervision over vehicle movements once beyond its operational control. Accordingly, drivers retain personal legal responsibility for compliance with road traffic legislation and safe operation.

Where an incident occurs involving a vehicle connected to Company operations, it must be reported immediately in accordance with incident reporting procedures. Failure to report may result in disciplinary or contractual action. The vehicle and transport safety framework forms part of the Company's broader risk management and due diligence system. While reasonable and proportionate measures are implemented to reduce risk, compliance relies upon lawful driver conduct and adherence to traffic management arrangements. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand vehicle and transport safety requirements, accept responsibility for lawful vehicle operation, and acknowledge that breach of road traffic or transport regulations may result in removal from duty or contractual termination.



SECTION 28 – FURTHER INFORMATION (First Aid and Medical Facilities)

Concept Management Group Ltd shall ensure that suitable and sufficient first-aid arrangements are established in accordance with the Health and Safety (First Aid) Regulations 1981 and proportionate to the nature, scale and risk profile of the works undertaken. The level of first-aid provision shall be determined by risk assessment and may include the appointment of trained first aiders, provision of first-aid kits, eye wash stations, and clear arrangements for contacting emergency services. Where operating under the control of a Principal Contractor, the Company shall verify that site-wide first-aid arrangements are adequate prior to commencement of works. First-aid equipment shall be maintained in a serviceable condition and inspected at appropriate intervals. Used or missing items shall be replenished without undue delay. First-aid kits shall be readily accessible and clearly identifiable. Where trained first aiders are appointed, they shall hold appropriate certification and operate within the limits of their training. First aiders are not medical practitioners and shall not provide treatment beyond their competency.

All injuries, however minor, must be reported immediately to supervision. First-aid treatment administered on site shall be recorded. Serious injuries, hospital treatment cases, or absences meeting statutory thresholds shall be assessed for reportability under RIDDOR by authorised management personnel. Clear procedures shall exist for contacting emergency services where required. Emergency contact information shall be made available, and personnel shall be informed of reporting and escalation procedures during induction or site briefing. The Company shall take reasonable steps to ensure that emergency medical arrangements are understood; however, it cannot guarantee immediate access to medical professionals in all circumstances. Individuals retain personal responsibility for reporting injury, cooperating with first-aid arrangements, and seeking medical attention where appropriate.

Subcontractors, labour-only and self-employed operatives remain responsible for ensuring that personnel under their control cooperate with site first-aid arrangements and comply with reporting requirements. The Company's provision or coordination of first-aid measures shall not transfer statutory duty for safe execution of works. The Company's first-aid framework forms part of its broader due diligence system and is intended to ensure prompt response to injury while maintaining lawful allocation of responsibility. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand first-aid and injury reporting requirements and acknowledge that failure to report injury promptly may result in disciplinary or contractual action.



SECTION 29 – FURTHER INFORMATION (Monitoring, Auditing, and Review)

Concept Management Group Ltd recognises that the existence of documented policies alone does not demonstrate compliance. Effective health, safety and environmental governance require structured monitoring, proportionate auditing and periodic management review in accordance with the Management of Health and Safety at Work Regulations 1999. The Company shall implement monitoring arrangements proportionate to the nature, scale and risk profile of its operations. Monitoring may include site inspections, supervisory oversight, permit checks, review of risk assessments, equipment inspections, incident trend analysis and review of subcontractor performance. Findings arising from inspections or monitoring activities shall be recorded where reasonably practicable and corrective actions identified. Corrective measures shall be implemented within a timeframe proportionate to the level of risk identified. Where significant non-compliance is identified, the Company reserves the right to suspend activities until satisfactory control measures are restored.

Internal audits may be undertaken periodically to assess the effectiveness of the Integrated Management System. The scope and frequency of audit shall be proportionate to operational risk, contractual obligations and business scale. Audit findings shall be reviewed by management and may result in procedural updates, additional training or revised control measures. External audit or consultancy support may be commissioned where deemed appropriate by management. Engagement of external advisors does not transfer statutory responsibility for compliance from the Company to any third party. Following incidents, enforcement action, significant operational changes or legislative updates, relevant sections of this Integrated Management System shall be reviewed and revised where necessary. Policy review shall be based upon risk, operational need and regulatory development rather than arbitrary timescales.

Directors shall retain strategic oversight of monitoring and review processes but may delegate operational implementation to competent managers. Such delegation constitutes lawful governance structure and does not remove overall corporate responsibility. While the Company establishes structured monitoring and review systems, it does not represent that every unsafe act or deviation can be prevented or detected in real time. The effectiveness of the system depends upon cooperation, accurate reporting and adherence to procedures by all personnel. Subcontractors, labour-only and self-employed operatives remain responsible for cooperating with monitoring activities and implementing corrective measures where deficiencies are identified within their scope of control. The monitoring and audit framework forms part of the Company's due diligence defence and demonstrates active governance rather than passive documentation. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand the monitoring and review processes, agree to cooperate with inspections and audits, and acknowledge that failure to address identified deficiencies may result in suspension or contractual action.



SECTION 30 – FURTHER INFORMATION (Fire Safety and Evacuation Plans)

Concept Management Group Ltd recognises that fire presents a significant risk to life, property and business continuity. Fire safety shall be managed in accordance with the Regulatory Reform (Fire Safety) Order 2005 and other applicable statutory requirements, proportionate to the nature and scope of the Company's operations. Where the Company exercises control over premises or a defined work area, suitable and sufficient fire risk assessment shall be undertaken so far as reasonably practicable. Where operating under a Principal Contractor or building Responsible Person, the Company shall review and comply with site-wide fire safety arrangements and cooperate fully with established emergency procedures. Fire hazards associated with facilities management, cleaning, landscaping machinery, maintenance and M&E works, including hot works, battery charging, fuel storage, combustible waste, temporary electrical supplies, flammable cleaning or maintenance products, plant rooms and maintenance areas, shall be identified through risk assessment. Ignition sources shall be controlled, and combustible materials shall be managed to minimise fire load where reasonably practicable.

Hot works shall be subject to formal control measures, including permit systems, fire watch arrangements and suitable firefighting equipment in proximity. Fire watches shall remain in place for an appropriate duration following completion of hot works. Fire detection and firefighting equipment shall be provided proportionate to the level of risk within areas under the Company's control. Such equipment may include extinguishers appropriate to identified hazards. Equipment shall be maintained in serviceable condition and accessible.

Emergency escape routes within areas under the Company's control shall be kept reasonably clear and unobstructed. Personnel shall not interfere with fire doors, alarms, extinguishers or detection systems. Evacuation procedures shall be communicated through site induction or briefing. Personnel must evacuate immediately upon activation of a fire alarm and proceed to designated assembly points in accordance with site procedures. Re-entry to affected areas shall only occur when authorised. Where fire marshals or designated persons are appointed within the Company's scope of control, they shall receive appropriate instruction. However, appointment of fire marshals does not transfer overall building fire responsibility where another party is the legally designated Responsible Person. The Company cannot guarantee prevention of all fire incidents. The fire safety framework forms part of its due diligence system and is intended to reduce risk through structured planning, supervision and cooperation with site-wide arrangements.

Subcontractors, labour-only and self-employed operatives remain responsible for ensuring that their activities do not introduce uncontrolled fire risk. The Company's monitoring or coordination shall not transfer statutory fire safety duties beyond those imposed by law. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand fire safety requirements, accept responsibility for complying with evacuation and fire prevention procedures, and acknowledge that breach of fire controls may result in removal from site or contractual action.



SECTION 31 – FURTHER INFORMATION (Well-being and Mental Health)

Concept Management Group Ltd recognises that mental health and psychological wellbeing form part of overall workplace health under the Health and Safety at Work etc. Act 1974. The Company acknowledges that construction environments may present pressures associated with physical demands, programme constraints and operational intensity. Accordingly, the Company seeks to promote a working environment that supports safe performance and reasonable wellbeing standards, proportionate to the nature and scale of its operations. Work planning shall consider fatigue, excessive working hours and unreasonable workload pressure so far as reasonably practicable. Supervisors are expected to exercise reasonable judgement in allocating tasks and monitoring observable signs of fatigue or distress that may present safety risk.

Mental health awareness may form part of supervisory training where proportionate. Such training is intended to improve awareness and communication; supervisors are not expected to provide clinical assessment, counselling or medical diagnosis. Where available and operationally appropriate, the Company may signpost personnel to external wellbeing resources or support services. Any such resources are provided on a voluntary basis and do not constitute a contractual entitlement to counselling, medical services or ongoing therapeutic provision. Personnel remain responsible for presenting themselves fit for work. Individuals must disclose any condition, medication or circumstance that may reasonably impair their ability to perform duties safely. Failure to do so may compromise risk control and may result in reassignment or suspension from safety-critical tasks.

The Company recognises that wellbeing is a shared responsibility. While reasonable steps are taken to promote a supportive environment, the Company cannot guarantee the prevention of stress, anxiety or personal hardship. The mental health framework forms part of the Company's broader governance and welfare system and shall be interpreted proportionately. Subcontractors, labour-only and self-employed operatives remain responsible for managing the wellbeing of personnel under their control and for ensuring that individuals engaged are fit to undertake assigned duties. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand the Company's approach to wellbeing, accept responsibility for maintaining fitness for work, and acknowledge that personal health management remains primarily an individual responsibility.



SECTION 32 – FURTHER INFORMATION (Bullying, Harassment, and Workplace Violence)

Concept Management Group Ltd is committed to maintaining a professional working environment in which all individuals are treated with dignity and respect. Conduct amounting to bullying, harassment, discrimination or workplace violence is unacceptable and may constitute breach of statutory duty under the Equality Act 2010 and other applicable legislation. Unacceptable behaviour may include, but is not limited to, unwanted conduct related to protected characteristics, intimidation, threatening behaviour, verbal abuse, physical aggression, deliberate humiliation, or any conduct that creates an intimidating, hostile, degrading or offensive environment. This standard applies to interactions between employees, subcontractors, labour-only operatives, visitors and third parties encountered in the course of work.

All personnel are expected to behave in a professional manner and refrain from conduct that may reasonably be perceived as harassment or bullying. The Company encourages early reporting of concerns so that matters may be addressed proportionately. Reports shall be treated seriously and reviewed in a manner appropriate to the circumstances. Investigation of complaints shall be undertaken in good faith and proportionate to the nature of the allegation. The Company cannot guarantee specific outcomes; however, reasonable steps shall be taken to assess the facts and implement appropriate measures where misconduct is identified.

Retaliation against individuals who raise genuine concerns in good faith is prohibited and may constitute serious misconduct. Where workplace violence risk arises due to the nature of operations — including lone working, interaction with members of the public, or work in isolated environments — proportionate risk assessments shall be undertaken. Control measures may include communication protocols, supervision arrangements or escalation procedures.

Subcontractors, labour-only and self-employed operatives remain responsible for the conduct of personnel under their control. The Company's oversight of conduct standards shall not create employment status or transfer statutory duties beyond those imposed by law. The Company cannot exercise continuous supervision over interpersonal conduct at all times. Accordingly, individuals retain personal responsibility for their behaviour and for contributing to a professional and safe working environment. This behavioural framework forms part of the Company's governance system and is intended to reduce foreseeable risk while maintaining lawful allocation of responsibility. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand expected standards of conduct, agree to comply with behavioural requirements, and acknowledge that breach may result in disciplinary or contractual action.



SECTION 33 – FURTHER INFORMATION (Lone Working)

Concept Management Group Ltd recognises that lone working may increase risk where individuals operate without direct supervision or immediate assistance. Lone working shall be managed in accordance with the Management of Health and Safety at Work Regulations 1999 and proportionate to the nature and risk of the task undertaken. Lone working shall only be permitted where risk assessment determines that the task can be undertaken safely without direct supervision. Certain high-risk activities — including confined space entry, high-risk hot works, live electrical intervention or heavy lifting operations — shall not be undertaken alone unless expressly authorised following enhanced assessment. Prior to authorising lone working, consideration shall be given to the individual's competence, experience, medical fitness, task complexity, environmental conditions, communication availability and emergency access arrangements.

Control measures may include scheduled check-in procedures, communication protocols, use of mobile devices, lone worker alarms, or site access controls. The level of monitoring shall be proportionate to the assessed risk. The Company cannot guarantee continuous real-time supervision of lone workers at all times; accordingly, individuals retain responsibility for exercising professional judgement and ceasing work where conditions become unsafe. Lone workers must maintain reliable means of communication and ensure that contact procedures are understood prior to commencement of work. Failure to respond to scheduled check-in procedures may trigger escalation in accordance with Company protocol.

Where lone working involves public interface or remote locations, additional precautions may be required, including avoidance of foreseeable confrontation, secure access arrangements and awareness of surroundings. Individuals must present themselves fit for lone working duties. Any medical condition, fatigue or impairment that may increase risk when working alone must be disclosed prior to undertaking the task. Supervisors may conduct periodic spot checks or remote verification of lone working arrangements proportionate to risk; however, such oversight does not constitute continuous supervision.

Subcontractors, labour-only and self-employed operatives authorising lone working under their control remain responsible for ensuring that risk assessments are completed and control measures implemented. The Company's coordination of works does not transfer statutory responsibility for safe execution of lone working tasks. The lone working framework forms part of the Company's structured due diligence system and demonstrates proportionate governance of isolated task risk. Effective implementation relies upon individual compliance and timely communication. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand lone working requirements, accept responsibility for complying with communication and safety protocols, and acknowledge that breach may result in suspension of lone working authorisation.



SECTION 34 – FURTHER INFORMATION (Substance Abuse Policy)

Concept Management Group Ltd recognises that the misuse of alcohol, illegal drugs, prescription medication or other substances capable of impairing judgement presents a significant safety risk, particularly in construction environments involving work at height, machinery operation, manual handling and hazardous substances. All personnel engaged in connection with Company operations must present themselves fit for duty. No individual shall report to work or remain on duty while under the influence of alcohol, illegal drugs or any substance that may impair their ability to perform tasks safely. Possession, consumption or distribution of illegal substances on sites under the Company's control is strictly prohibited. Alcohol consumption during working hours or prior to undertaking safety-critical tasks is prohibited.

Where a supervisor reasonably believes that an individual may be impaired, the Company reserves the right to remove that individual from safety-critical duties pending assessment. Removal from task shall be treated as a precautionary safety measure and shall not in itself constitute disciplinary action. Drug and alcohol testing may be undertaken where lawful, proportionate and contractually permissible, particularly in safety-critical roles or following a serious incident where impairment is reasonably suspected. Any testing undertaken shall comply with applicable data protection and employment legislation. The Company does not operate blanket or arbitrary testing regimes.

Personnel must disclose any prescribed medication or medical treatment that may affect alertness, coordination or judgement where such impairment may create safety risk. Disclosure shall be treated confidentially and assessed proportionately. Where substance misuse concerns are identified, the Company may, where appropriate and proportionate, signpost individuals to external support resources. The Company does not provide medical or rehabilitation services and does not guarantee availability of counselling support. Responsibility for managing substance misuse remains with the individual. Subcontractors, labour-only and self-employed operatives remain responsible for ensuring that personnel under their control are fit for duty and compliant with substance misuse requirements. The Company's oversight of site fitness standards does not transfer statutory or employment responsibility beyond that imposed by law.

Failure to comply with this substance misuse framework may result in suspension from duties, removal from site, termination of engagement or reporting to relevant authorities where required. The substance misuse framework forms part of the Company's due diligence and risk management system and is intended to protect personnel, clients and the public from foreseeable harm associated with impairment. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand the fitness-for-duty requirements, accept responsibility for presenting themselves unimpaired, and acknowledge that breach may result in contractual or disciplinary action.



SECTION 35 – FURTHER INFORMATION (Working with Vulnerable Groups)

Concept Management Group Ltd recognises that certain projects may involve work in environments where children, elderly persons or individuals with disabilities are present. The Company acknowledges that such environments may require enhanced safeguarding awareness and behavioural standards. Where works are undertaken in schools, healthcare settings, residential facilities or similar environments, the Company shall cooperate with safeguarding requirements established by the Client or Responsible Authority. Compliance with site-specific safeguarding protocols shall form part of the Company's risk assessment and planning process.

Where contractually required or reasonably deemed necessary due to the nature of the environment, personnel may be required to undergo appropriate background screening, including Disclosure and Barring Service (DBS) checks. The level of screening shall be proportionate to the degree of interaction with vulnerable persons. The Company does not undertake universal background checks where operationally unnecessary. Personnel working in such environments shall be instructed to maintain professional boundaries at all times and to avoid unnecessary interaction with vulnerable individuals beyond what is required to perform contracted works.

Any safeguarding concern observed in the course of works shall be reported in accordance with site-specific safeguarding procedures or escalated to designated safeguarding contacts. The Company's role is limited to reporting concerns and does not extend to investigative authority unless otherwise required by law. Risk assessments for works in environments involving vulnerable groups shall consider access control, supervision arrangements, segregation of work areas, timing of activities and safeguarding protocols provided by the Client.

Subcontractors, labour-only and self-employed operatives engaged in such environments remain responsible for ensuring that personnel under their control comply with safeguarding requirements and maintain appropriate conduct. The Company's coordination of works does not transfer safeguarding statutory duties beyond those imposed by law. The Company cannot provide continuous supervision of individual conduct in all circumstances. Accordingly, individuals remain personally responsible for professional behaviour and compliance with safeguarding protocols.

The safeguarding framework forms part of the Company's broader governance system and is intended to ensure proportionate risk management when operating in sensitive environments. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand safeguarding expectations, agree to maintain professional standards of conduct, and acknowledge that breach may result in removal from site or contractual action.



SECTION 36 – FURTHER INFORMATION (Display Screen Equipment (DSE) and Ergonomics)

Concept Management Group Ltd recognises that prolonged use of display screen equipment (DSE) may present risks of musculoskeletal discomfort, eye strain and fatigue. The Company shall manage DSE-related risks in accordance with the Health and Safety (Display Screen Equipment) Regulations 1992, proportionate to the scale and nature of its administrative operations. Personnel who habitually use DSE as a significant part of their normal work shall be identified through role assessment. Where required, suitable and sufficient workstation assessments shall be undertaken, either through structured self-assessment supported by guidance or through management review, proportionate to risk.

Workstations shall, so far as reasonably practicable, be arranged to promote neutral posture, appropriate screen height, suitable seating support and adequate lighting. Adjustable chairs, stable work surfaces and appropriate screen positioning shall be provided where operationally necessary. Personnel shall be advised to organise work to allow periodic changes of activity and short breaks to reduce prolonged static posture. The Company encourages individuals to report discomfort, visual strain or symptoms of repetitive injury at an early stage so that adjustments may be considered.

Where corrective eyewear is required specifically for DSE use and statutory criteria are met, appropriate arrangements shall be considered in accordance with regulatory requirements. The Company recognises that DSE risks are generally low when managed proportionately. Accordingly, controls shall be implemented so far as is reasonably practicable, taking into account the scale of office-based operations and hybrid working arrangements. Where personnel work remotely or from home on a temporary or hybrid basis, individuals retain responsibility for ensuring that their working environment is reasonably safe and suitable. The Company may provide guidance for remote workstation setup; however, it cannot exercise direct control over domestic environments.

Subcontractors and self-employed operatives undertaking administrative duties under their own control remain responsible for compliance with DSE obligations applicable to their working arrangements. The DSE and ergonomic framework forms part of the Company's broader occupational health governance system and is intended to minimise foreseeable strain-related risk without imposing disproportionate administrative burden. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand DSE guidance, accept responsibility for cooperating with ergonomic controls, and acknowledge that early reporting of discomfort is essential to effective risk management.



SECTION 37 – FURTHER INFORMATION (Traffic Management and Pedestrian Safety)

Concept Management Group Ltd recognises that vehicle and pedestrian interaction within construction and operational environments presents a significant risk of serious injury. Site traffic shall be managed in accordance with the Construction (Design and Management) Regulations 2015 and relevant statutory guidance, proportionate to the scale and complexity of the works. Where the Company exercises control over a defined work area, traffic management arrangements shall be established to minimise foreseeable collision risk. Such arrangements may include segregation of pedestrians and vehicles, clearly defined walkways, designated loading zones, controlled delivery times, signage, lighting and appropriate speed restrictions.

Where operating under a Principal Contractor, the Company shall comply with established site traffic management plans and cooperate with coordination arrangements. The Company shall not assume responsibility for overall site logistics where such responsibility rests contractually with another party. Reversing manoeuvres shall be minimised so far as reasonably practicable. Where reversing cannot be avoided and visibility is restricted, the use of a competent banksman or alternative control measure may be required. Personnel acting as banksmen must be suitably instructed and positioned safely.

Plant, telehandlers, forklifts and other mobile equipment introduced to site by subcontractors remain under the control and responsibility of the party supplying them. The Company's coordination of site access does not transfer statutory responsibility for plant operation or maintenance. Pedestrians must use designated routes where provided and remain alert to moving vehicles. Unauthorised crossing of vehicle-only zones is prohibited. All personnel share responsibility for maintaining situational awareness in dynamic construction environments.

Deliveries shall be planned to avoid congestion and uncontrolled vehicle movement. Drivers must comply with site speed limits, signage and instructions issued by authorised personnel. The Company may undertake proportionate monitoring of traffic arrangements within areas under its control. However, it cannot exercise continuous supervision over all vehicle movements. Drivers and plant operators retain personal legal responsibility for safe operation at all times.

Where deficiencies in traffic control are identified that present serious risk, the Company reserves the right to suspend activities until suitable controls are restored. The traffic management framework forms part of the Company's structured risk governance system and demonstrates due diligence in managing vehicle-pedestrian interface risk. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand site traffic control requirements, accept responsibility for complying with traffic arrangements, and acknowledge that breach may result in removal from task or site.



SECTION 38 – FURTHER INFORMATION (Infectious Disease Control)

Concept Management Group Ltd recognises that infectious diseases may present risk to workforce health, operational continuity and public safety. The Company shall implement proportionate control measures in accordance with the Health and Safety at Work etc. Act 1974, applicable public health legislation and relevant government guidance in force at the time. Control measures shall be risk-based and proportionate to the level of transmission risk identified. Measures may include promotion of good hygiene practices, provision of handwashing facilities or sanitising products where appropriate, cleaning of shared surfaces, and task-specific controls where close contact cannot reasonably be avoided.

Personnel who are unwell or experiencing symptoms of a contagious illness that may affect safety or others are expected to notify supervision and refrain from attending work where doing so would present foreseeable risk. Individuals remain responsible for managing their own health and seeking appropriate medical advice where necessary. Where required by prevailing public health guidance or contractual obligation, additional control measures may be implemented. Such measures may include temporary distancing protocols, revised welfare arrangements or other risk mitigation strategies proportionate to the circumstances. Health screening, temperature checks or health declarations may be considered where lawful, proportionate and consistent with data protection requirements. Any health-related information collected shall be processed in accordance with applicable data protection legislation and retained only as necessary.

In the event of confirmed or suspected outbreak linked to Company operations, management may implement additional precautionary measures proportionate to risk, including enhanced cleaning or temporary adjustment of work practices. The Company does not assume the role of public health authority and shall rely upon guidance issued by relevant government or regulatory bodies. Subcontractors, labour-only and self-employed operatives remain responsible for ensuring that personnel under their control do not knowingly attend site while unfit due to contagious illness and for complying with site-specific public health measures.

The Company cannot guarantee prevention of infectious disease transmission. The infectious disease control framework forms part of its broader risk management system and shall be interpreted proportionately to the circumstances prevailing at the time. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand infectious disease control expectations, accept responsibility for complying with hygiene and reporting protocols, and acknowledge that failure to do so may result in removal from site.



SECTION 39 – FURTHER INFORMATION (Stress)

Concept Management Group Ltd recognises that excessive or unmanaged work-related stress may present risk to individual wellbeing and, in certain circumstances, may affect workplace safety and performance. The Company acknowledges its duty under the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 to assess and manage risks so far as is reasonably practicable. Work-related stress shall be considered within the Company's general risk management framework. Where foreseeable risk factors are identified — including excessive workload, prolonged working hours, unclear role expectations or breakdown in communication — such matters may be reviewed proportionately by management.

The Company may utilise guidance such as the HSE Management Standards for Work-Related Stress where appropriate; however, the application of such guidance shall be proportionate to the scale and complexity of operations and shall not create an absolute obligation to eliminate all stressors. Risk control measures, where reasonably practicable, may include INFORMATION of roles, adjustment of task allocation, improved communication channels or supervisory review. Implementation of such measures shall be balanced against operational requirements and commercial constraints.

The Company encourages personnel to raise concerns relating to work-related stress at an early stage so that matters may be considered constructively. Concerns raised in good faith shall be reviewed proportionately and without retaliation. While the Company seeks to promote a professional and supportive working environment, it cannot guarantee the prevention of stress or eliminate all external or personal factors that may contribute to individual wellbeing concerns. Personal resilience, health management and communication remain shared responsibilities.

Supervisors are not clinicians and are not expected to diagnose or treat mental health conditions. Where appropriate, individuals may be signposted to external support resources; however, the Company does not provide medical or therapeutic services. Subcontractors, labour-only and self-employed operatives remain responsible for managing the wellbeing of personnel under their control and ensuring that workloads are organised safely within their scope of engagement.

The stress management framework forms part of the Company's broader governance system and shall be interpreted in accordance with the principle of proportionality and reasonable practicability. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand the Company's approach to managing work-related stress, accept responsibility for raising concerns appropriately, and acknowledge that organisational measures cannot remove all personal or external stress factors.



SECTION 40 – FURTHER INFORMATION (Mental Health Governance and Fitness for Work)

Concept Management Group Ltd recognises that the construction industry presents elevated mental health risks arising from physically demanding work, programme pressure, commercial deadlines and safety-critical environments. The Company acknowledges that unmanaged psychological strain may affect concentration, judgement and overall safety performance. Mental health considerations form part of the Company's wider health and safety governance framework and shall be managed in accordance with the principle of reducing risk so far as is reasonably practicable.

Personnel are required to present themselves mentally fit for duty at all times. Where an individual is experiencing mental health difficulties, excessive stress, emotional distress or any condition that may impair safe performance, the Company must be informed immediately. Early disclosure is essential to allow appropriate and proportionate measures to be considered. The Company is committed to responding constructively where concerns are raised. Where notified of a genuine wellbeing concern, management will engage in discussion, assess the situation proportionately and, where reasonably practicable, implement supportive measures. Such measures may include temporary adjustment of duties, supervisory support, signposting to external services or other practical workplace accommodations consistent with operational requirements.

The Company will treat such disclosures with discretion and without retaliation. However, disclosure does not create an automatic entitlement to role change, leave or long-term adjustment beyond what is reasonably practicable and lawful. Supervisors are not medical professionals and are not responsible for diagnosis or treatment. The Company does not provide clinical services; however, where appropriate, individuals may be directed towards external support resources.

Failure to disclose a mental health condition or impairment that materially affects safety-critical performance — including work at height, machinery operation, confined spaces or driving — may constitute a breach of safety obligations. Subcontractors, labour-only and self-employed operatives remain responsible for ensuring that personnel under their control are mentally fit to undertake assigned duties and for notifying the Company of any matter that may affect site safety.

The mental health governance framework forms part of the Company's due diligence system and demonstrates structured consideration of psychological risk within construction operations. By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they understand the requirement to disclose impairing conditions promptly and acknowledge that the Company will provide reasonable support where notified, subject to operational and legal constraints.



SECTION 41 – FURTHER INFORMATION (Dust and Dusty Environments)

Concept Management Group Ltd recognises that dust generation can arise within property maintenance, grounds work, cleaning, drilling, cutting, M&E activities and other facilities-management tasks. Dust exposure may arise from drilling or cutting substrates, sanding, grounds maintenance, sweeping, plant-room work, ceiling-void access, refurbishment interfaces and disturbance of existing materials. Certain dusts, including respirable crystalline silica (RCS), wood dust, organic dust, fine particulates and other hazardous airborne contaminants, present significant long-term occupational health risks if not adequately controlled. Dust-related health risks may include occupational asthma, chronic obstructive pulmonary disease (COPD), silicosis and other respiratory conditions that may develop gradually over prolonged exposure. Accordingly, dust control forms a critical element of the Company's occupational health governance framework and shall be managed in accordance with the Control of Substances Hazardous to Health Regulations 2002 (COSHH) and associated Workplace Exposure Limits (WELs).

Risk Assessment and Hierarchy of Control

All activities likely to generate dust shall be subject to suitable and sufficient COSHH assessment prior to commencement. Risk assessments shall consider:

- Type and composition of dust
- Duration and frequency of exposure
- Confined or poorly ventilated conditions
- Interaction with other trades
- Potential for secondary exposure

Where reasonably practicable, dust generation shall be eliminated or reduced at source. Control measures shall follow the hierarchy of control, prioritising:

- Elimination or substitution of high-dust processes
- Engineering controls such as on-tool extraction, local exhaust ventilation (LEV), water suppression systems and controlled cutting methods
- Segregation or isolation of dusty activities
- Administrative controls including task planning and exposure time limitation
- Personal protective equipment (PPE) and respiratory protective equipment (RPE) as a final line of defence

Respiratory Protective Equipment (RPE)

Where dust exposure cannot be adequately controlled through engineering and organisational measures, suitable RPE shall be provided in accordance with assessed risk. RPE must be appropriate to the hazard identified and used in accordance with manufacturer instructions. Face-fit testing shall be undertaken where required by regulation. Personnel must comply with RPE requirements and report defects or issues immediately. Failure to wear required RPE in dusty environments shall constitute breach of Company safety rules.

Workplace Exposure Limits and Monitoring

Exposure shall be reduced so far as reasonably practicable below applicable Workplace Exposure Limits. Where risk assessment indicates potential for significant exposure, air monitoring may be undertaken by a competent person. Monitoring shall be proportionate to risk and operational scale. Monitoring results, where obtained, shall inform review of control measures but do not constitute a guarantee of zero exposure.

Housekeeping and Secondary Dust Control

Accumulation of settled dust shall be prevented through robust housekeeping arrangements. Dry sweeping is prohibited. Approved cleaning methods, including vacuum systems fitted with suitable filtration (e.g., M-class or H-class as appropriate), shall be used. Waste materials shall be removed from work areas promptly to prevent airborne re-suspension.

Health Surveillance

Where risk assessment identifies ongoing exposure that may present foreseeable health risk, appropriate health surveillance shall be implemented proportionately, in accordance with COSHH requirements. Surveillance may include respiratory questionnaires or lung function testing where applicable. Health surveillance is intended as early detection and does not constitute medical treatment or guarantee prevention of disease.

Welfare and Decontamination

Where dusty processes are undertaken, suitable welfare arrangements shall be provided to prevent ingestion or transfer of dust. This may include washing facilities and designated clean areas separate from dusty environments. Personnel must not eat, drink or smoke in dusty work zones.

Explosive Dust and DSEAR Considerations

Where fine dust accumulation presents potential for combustible or explosive atmosphere — particularly in confined spaces — the Company shall assess risk under the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) where applicable. Ignition sources shall be controlled and housekeeping standards maintained to prevent hazardous accumulation.



Subcontractor Responsibility

Subcontractors, labour-only and self-employed operatives generating dust remain responsible for undertaking suitable COSHH assessments, implementing control measures and ensuring compliance within their scope of work. The Company's coordination or review of documentation does not transfer statutory responsibility for dust control.

Governance and Due Diligence

The dust management framework forms part of the Company's structured occupational health governance system and demonstrates proactive control of long-term exposure risks. While reasonable and proportionate measures are implemented, the Company cannot eliminate all dust generation inherent within construction activities. Personnel are required to report respiratory symptoms, control failures or unsafe dusty conditions immediately. Failure to comply with dust control measures may result in removal from task or site. By signing the Main Signing Page of this Integrated Management System, the signatory confirms understanding of dust control requirements, acceptance of RPE obligations and acknowledgement of personal responsibility for compliance.



SECTION 42 – FURTHER INFORMATION (Duties as a contractor under CDM Regulations 2015)

Concept Management Group Ltd acknowledges its statutory duties when acting in the capacity of a Contractor under the Construction (Design and Management) Regulations 2015 (CDM 2015). The Company shall discharge its obligations in accordance with Regulation 15 and related provisions, proportionate to the nature and scope of works undertaken. The Company recognises that CDM 2015 imposes distinct roles and responsibilities upon Clients, Principal Designers, Principal Contractors and Contractors. Nothing within this Integrated Management System shall be construed as accepting duties assigned to another duty holder unless expressly agreed in writing.

Planning, Management and Monitoring of Work

When acting as a Contractor, the Company shall plan, manage and monitor its construction work so that it is carried out without risks to health and safety so far as reasonably practicable. This includes ensuring that works are executed in accordance with relevant risk assessments, method statements and safe systems of work. The Company's duty to plan and manage work applies to activities within its control and does not extend to overall site coordination unless formally appointed as Principal Contractor.

Cooperation and Coordination

The Company shall cooperate with other duty holders, including the Principal Contractor and Principal Designer, and shall comply with reasonable directions relating to health and safety. Where multiple contractors are working concurrently, the Company shall coordinate its activities to avoid foreseeable risk arising from interface with other trades. The Company shall provide relevant information regarding risks arising from its activities to other duty holders as required under CDM 2015.

Competence and Supervision

The Company shall ensure that persons appointed to carry out construction work possess the appropriate skills, knowledge, training and experience for the tasks assigned. Suitable supervision shall be provided proportionate to risk. Delegation of supervision constitutes lawful distribution of operational control and shall not be interpreted as abdication of governance responsibility by Directors.

Risk Assessment and Method Statements

The Company shall prepare suitable and sufficient risk assessments and method statements for works under its control. These documents shall identify significant hazards and appropriate control measures. The review or acceptance of documentation by another party does not transfer statutory responsibility for safe execution of works.

Welfare

Where the Company controls a site or defined work area, it shall ensure that welfare facilities are provided in accordance with Schedule 2 of CDM 2015 so far as reasonably practicable. Where operating under a Principal Contractor, the Company shall verify that welfare arrangements provided are adequate prior to commencement of works.

Prevention of Unauthorised Access

The Company shall take reasonable steps to prevent unauthorised access to areas under its control where construction work presents risk. Responsibility for overall site security shall remain with the duty holder assigned that function under CDM arrangements unless otherwise agreed.

Incident Reporting and Cooperation with Enforcement Authorities

The Company shall report and respond to incidents in accordance with statutory requirements, including RIDDOR where applicable. The Company shall cooperate with regulatory authorities where legally required.

Limitation of Role and Allocation of Responsibility

Nothing within this section shall expand the Company's duties beyond those imposed by CDM 2015 or by express contractual appointment. Where the Company is not appointed as Principal Contractor, it does not assume overall site management or coordination responsibilities. Subcontractors engaged by the Company remain responsible for planning, managing and monitoring works under their control in accordance with CDM 2015. The Company's oversight or coordination does not transfer statutory duty beyond that imposed by law. The Company's CDM compliance framework forms part of its structured governance and due diligence system. Directors retain strategic oversight of CDM compliance but delegate operational implementation to competent personnel. Such delegation constitutes lawful governance practice and shall not create personal liability where reasonable systems are in place. By signing the Main Signing Page



of this Integrated Management System, the signatory confirms understanding of CDM Contractor duties, acceptance of responsibilities applicable to their role, and acknowledgement that breach of CDM obligations may result in enforcement action or contractual consequences.

FINAL STRUCTURAL GOVERNANCE CLAUSES BINDING ACCEPTANCE, INDEMNITY AND ENFORCEABILITY

Reasonably Practicable and Proportionality Interpretation Clause

All duties, obligations and control measures contained within this Integrated Management System shall be interpreted and applied in accordance with the statutory principle of reducing risk so far as is reasonably practicable. Implementation of measures shall be proportionate to the nature, scale and risk profile of the works undertaken.

Nothing within this document shall be construed as creating an absolute guarantee of risk elimination, continuous supervision, or universal compliance beyond that required by applicable legislation. The existence of this Integrated Management System demonstrates structured governance and due diligence but does not remove individual statutory responsibilities imposed by law.

Delegation of Operational Control and Director Oversight Clause

The Directors of Concept Management Group Ltd retain strategic oversight of health, safety and environmental governance. Operational planning, supervision and implementation of control measures are delegated to competent managers, supervisors and independent subcontracting entities in accordance with recognised corporate governance principles.

Such delegation constitutes lawful distribution of operational responsibility and shall not be interpreted as abdication of governance duty. Directors shall not incur personal liability where structured systems, proportionate monitoring arrangements and reasonable due diligence procedures have been established and maintained.

Allocation of Responsibility and Independent Contractor Status Clause

Nothing within this Integrated Management System shall create an employment relationship, partnership, joint venture or agency between the Company and any subcontractor, labour-only or self-employed operative.

Independent parties remain responsible for planning, managing and executing works under their control in compliance with statutory obligations. The Company's coordination, monitoring or enforcement of safety standards shall not constitute assumption of full operational control beyond duties imposed by law or express contractual agreement.

Failure by the Company to enforce any provision of this document at any time shall not constitute waiver of its right to enforce that provision subsequently.

By signing the Main Signing Page of this Integrated Management System, the signatory confirms that they have read this document in its entirety, understood its provisions, and agree to comply fully with all sections. The signatory acknowledges that this IMS forms part of the contractual framework governing engagement and that breach may result in removal from site, termination of contract, recovery of financial losses, and potential reporting to regulatory authorities.

The signatory further agrees to indemnify Concept Management Group Ltd against losses arising from negligent or unlawful acts committed under their control, to the fullest extent permitted by law.

Ignorance of this document shall not constitute a defence.

CONCEPT MANAGEMENT GROUP LTD



MANDATORY OPERATIVE PQQ & SIGN-OFF

REQUIRED BEFORE ANY FM, LANDSCAPING, CLEANING, MAINTENANCE OR M&E WORK

This mandatory section forms part of the same controlled booklet. Read the IMS first, then complete and sign the PQQ before mobilisation or starting any Concept Management Group work. The form applies across facilities management, landscaping, commercial cleaning, property maintenance, M&E and associated FM activities.

MANDATORY ACTION - COMPLETE AND SIGN THIS PQQ BEFORE STARTING WORK

1 READ / REVIEW THE IMS POLICY

2 COMPLETE THE OPERATIVE PQQ

3 SIGN THE FINAL DECLARATION

How to complete: click into each highlighted field, choose the correct options, tick every applicable acknowledgement and complete the declaration and signature fields. The amber PQQ section is mandatory.

NO START UNTIL COMPLETE



MANDATORY OPERATIVE PQQ

Health, Safety, Competency & Fitness-for-Work Declaration

BUILT ON
PEOPLE
DELIVERING
EXCEPTIONAL
PLACES



FACILITIES
MANAGEMENT



LANDSCAPING
& GROUNDS



COMMERCIAL
CLEANING



M&E SERVICES



AND RELATED
FM WORKS



MANDATORY COMPLETION: This form must be completed personally by the operative before mobilisation. No person is authorised to commence work for or on behalf of Concept Management Group Ltd until all mandatory questions are answered and the declaration is signed. This form operates alongside the Concept Integrated Management System (IMS), project RAMS, COSHH assessments, permits and site induction.

**SAFER
PEOPLE
SAFER PLACES
BRIGHTER
TOMORROWS**

1 OPERATIVE & ENGAGEMENT DETAILS

OUR PEOPLE | OUR PLACES | OUR RESPONSIBILITY

Full legal name:		Trade / role (e.g. FM Operative, Gardener, Cleaner, Electrician):	
Trading / company name:		Mobile:	
Email:		Emergency contact / number:	
UTR / Company No. (if applicable):		Engagement type (e.g. Employed, Self-employed, Labour-only, Subcontractor):	

2 COMPETENCE & AUTHORISATION

RIGHT PEOPLE | RIGHT SKILLS | RIGHT OUTCOMES

Tick each item that applies and provide evidence where requested. A blank response means the operative is NOT authorised for that activity.

✓	DECLARATION	INITIALS
☐	I hold a current CSCS card or relevant trade/competence card appropriate to my role (e.g. IPAF, PASIVA, NPTC, ECS, DBS where required).	Initial: _____
☐	I have completed asbestos awareness training appropriate to my role (e.g. for FM, maintenance or refurbishment works).	Initial: _____
☐	I have received working at height training/instruction appropriate to the tasks I may undertake (e.g. ladders, MEWPs, towers, roof access).	Initial: _____
☐	I am trained/competent in manual handling relevant to my work.	Initial: _____
☐	I am competent to use the plant, equipment and tools required for my role (e.g. FM machinery, power tools, grounds maintenance equipment, cleaning equipment, M&E tools) and hold relevant training where	Initial: _____
☐	I am competent to carry out FM-related tasks within my role (e.g. cleaning, landscaping/grounds maintenance, building maintenance, M&E works) and understand the associated risks and control measures.	Initial: _____
☐	I will not undertake any task that falls outside my competence, training, medical fitness or authorisation.	Initial: _____

3 NON-NEGOTIABLE SAFETY RULES

NO COMPROMISE | NO EXCEPTIONS | EVERYONE HOME SAFE

✓	DECLARATION	INITIALS
☐	I will read and follow all applicable RAMS, COSHH assessments, permits, site rules and lawful safety instructions before starting work.	Initial: _____
☐	I will STOP WORK immediately if conditions differ materially from the RAMS, controls fail, required PPE is unavailable, or I consider the task unsafe.	Initial: _____
☐	I will STOP WORK immediately if I identify a situation that could put the public, colleagues or others at risk.	Initial: _____
☐	I will report any unsafe conditions, hazards, near misses and incidents to my supervisor/manager immediately.	Initial: _____



3 NON-NEGOTIABLE SAFETY RULES - CONTINUED

NO COMPROMISE | NO EXCEPTIONS

MANDATORY: complete both acknowledgements below before continuing to Health & Fitness.

DECLARATION	INITIALS
☐ I will STOP WORK immediately if I encounter suspected asbestos, unknown or damaged building materials, contaminated waste, sharps, hazardous substances or any unidentified material, and I will notify supervision.	Initial: _____
☐ I understand that knowingly bypassing controls, working outside my competence or concealing a safety issue may result in immediate removal from site and termination of engagement.	Initial: _____

CONFIDENTIAL HEALTH & FITNESS

Complete honestly - disclose only information relevant to safe work

CONFIDENTIAL HEALTH INFORMATION: Concept only requires information that is relevant to safe performance, emergency response, exposure control or reasonable adjustments. If you answer YES, give enough detail for Concept to assess whether a restriction, adjustment, occupational-health review or further evidence is required.

4. HEALTH SCREENING

Question	YES	NO	Initial
Respiratory condition, asthma, breathing difficulty, persistent cough or previous occupational lung condition?	☐	☐	
Skin condition, dermatitis, allergy or sensitivity that may be aggravated by dusts, fibres and airborne contaminants, adhesives, sealants, dust or PPE?	☐	☐	
Back, neck, shoulder, joint, muscular or other condition affecting lifting, overhead work, climbing or repetitive movement?	☐	☐	
Heart, circulatory or blood-pressure condition that may affect physical work, heat, exertion or work at height?	☐	☐	
Epilepsy, seizure, blackout, fainting, dizziness, balance problem or loss of consciousness?	☐	☐	
Diabetes or other condition requiring medication, food timing or monitoring during the working day?	☐	☐	
Hearing condition or significant hearing loss relevant to alarms, plant or communication?	☐	☐	
Vision condition not adequately corrected that may affect safe working?	☐	☐	
Claustrophobia, panic response or other condition relevant to plant rooms, service areas, enclosed spaces, ceiling voids or lone/remote working?	☐	☐	
Hand-arm vibration symptoms, numbness, tingling, circulation problems or diagnosed HAVS?	☐	☐	
Mental-health condition, acute stress, fatigue, sleep issue or other condition that may materially affect concentration, judgement or safe performance?	☐	☐	



Prescription medication or treatment that may affect alertness, coordination, judgement, breathing, heat tolerance or physical capability?	☐	☐	
Any current injury, recent surgery, ongoing treatment, disability or restriction relevant to the work?	☐	☐	
Any previous occupational illness, work-related health condition or medical advice restricting this type of work?	☐	☐	
Any other health matter that could reasonably affect your ability to undertake Concept work safely?	☐	☐	

5. DETAILS OF ANY YES ANSWER / RESTRICTIONS / ADJUSTMENTS

Condition / issue	How it affects work / required adjustment / medical advice

If you are unsure whether a condition is relevant, disclose it. Concept may seek proportionate occupational-health or medical advice before authorising particular duties. Do not start a safety-critical task if you are uncertain about your fitness to do it safely.

OPERATIVE DECLARATION

Active acknowledgement - initials and signature required

6. WORK-SPECIFIC HEALTH & EXPOSURE ACKNOWLEDGEMENT

I acknowledge that Concept work can include facilities management, commercial cleaning, landscaping and grounds maintenance, property maintenance, M&E and associated FM activities. These may involve cleaning chemicals, fuels and oils, dust and aerosols, biological hazards, noise, vibration, machinery and powered equipment, hot or cold services, electrical risks, manual handling, repetitive work, work at height, plant rooms, service areas, external environments, lone working, legacy materials, members of the public and interaction with other contractors. I understand that controls are task-specific and must be followed exactly.

☐	I understand that PPE/RPE is a residual control and I must use, inspect and maintain it as instructed. I will not work where required RPE cannot achieve an effective fit.	Initial:
☐	I will immediately report breathing difficulty, irritation, dizziness, unusual fatigue, skin reaction, hearing change, numbness/tingling, chemical exposure, sharps/biological exposure, allergic reaction or any other symptom that may be work-related.	Initial:
☐	I will cooperate with face-fit testing, health surveillance, exposure monitoring or occupational-health review where required by law or reasonably identified by risk assessment.	Initial:
☐	I will notify Concept BEFORE work if a medical condition, medication, injury, fatigue, impairment or restriction may affect safe performance, and will notify Concept of any material change during my engagement.	Initial:
☐	I confirm that I have had the opportunity to raise any concern about whether Concept work may aggravate a pre-existing condition, and I will not knowingly undertake work that I believe is unsafe for my health.	Initial:

7. PERSONAL RESPONSIBILITY & RELIANCE ON INFORMATION



I understand that Concept will rely on the accuracy and completeness of the information I provide when assessing my suitability, allocating work and determining controls. I accept personal responsibility for truthful disclosure, for working within my competence and stated limitations, and for following the controls communicated to me. If I knowingly or negligently provide false or incomplete information, conceal a relevant condition or symptom, disregard RAMS/COSHH/PPE/RPE requirements, or undertake unauthorised work, I understand that Concept may suspend or terminate my engagement and may rely on this signed declaration when responsibility for any resulting loss, injury, illness or claim is assessed.

LEGAL POSITION: Nothing in this declaration excludes or limits any duty or liability that cannot lawfully be excluded. The purpose of this form is to create a clear, contemporaneous record of the information supplied by the operative, the warnings and controls acknowledged, and the operative's continuing duty to report changes and comply with safe systems of work.

8. FITNESS-FOR-WORK DECLARATION - TICK ONE

☐	I consider myself FIT to undertake normal duties within my competence, subject to the RAMS/COSHH and controls provided.	Initial:
☐	I consider myself FIT WITH RESTRICTIONS / ADJUSTMENTS, which I have disclosed above and which must be agreed before I start affected duties.	Initial:
☐	I DO NOT consider myself currently fit to undertake the proposed duties and I will not commence work until Concept confirms the position.	Initial:

9. FINAL DECLARATION & SIGNATURE

By signing below, I confirm that I completed this form personally; my answers are true and complete to the best of my knowledge; I have not knowingly withheld information relevant to safe work; and I agree to comply with the Concept IMS, RAMS, COSHH, permits, inductions and safety instructions.

Electronic signature acknowledgement:

Operative full name	
Operative signature / date	
Concept representative	
Concept review outcome	
Reviewer signature / date	

SITE / PRE-START RECONFIRMATION

Use at mobilisation, a new site, material task change or where health/fitness has changed

This short confirmation does not replace the annual PQQ, RAMS briefing or site induction. It confirms that the operative's position has not changed and that the relevant site and task controls have been received before work starts.

10. PRE-START CONFIRMATION

☐	I confirm that nothing has changed in my health, medication, injury status, competence or restrictions since my latest Concept PQQ that would affect safe	Initial:
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	working. If anything has changed, I have informed Concept before starting.	
☐	I confirm that I have received / been briefed on the applicable site/task RAMS and COSHH information and understand the controls relevant to my task.	Initial:
☐	I confirm that I have the required PPE/RPE and that it is suitable and serviceable for the task.	Initial:
☐	I confirm that I will stop work and report immediately if conditions change, controls are inadequate, suspected asbestos/unknown materials are encountered, or I become unwell / unable to work safely.	Initial:

11. SITE / TASK SIGN-ON RECORD

Site / Contract / Task	Date	Operative Name	Signature	Concept / Supervisor
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter

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Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter
Click to enter	Click to enter	Click to enter	Click to enter	Click to enter

12. COMPANY CONTROL - NO START UNLESS COMPLETE

NO START RULE: An operative must not commence work where this form is incomplete, a mandatory answer is blank, a YES health answer has not been reviewed where relevant, competence evidence is missing/expired, required RAMS/COSHH have not been briefed, or required PPE/RPE/face-fit arrangements are not in place. Supervisors must escalate uncertainty before mobilisation.

Document owner: Concept Management Group Ltd | Review frequency: annually and on material change | Retention: in accordance with the Concept IMS and applicable data-protection / health-and-safety requirements.