

Group Health & Safety Policy and Standards			
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Summary	Mpac's Global Health & Safety Policy ensures a unified, company-wide approach to safety, promoting shared responsibility and consistent standards across all sites.		
Prepared By	Carl Burton	Approved by	Adam Holland



Introduction



As a global business, at Mpac we have in place stringent Health and Safety standards.

Our goal is always to pursue zero harm to people.

We share information on our Health and Safety performance, promote best practice in our industry, and manage Health and Safety matters as any other critical business activity. We promote a culture in which all

Mpac people share this commitment.

Our Health and Safety policy ensures that Mpac:

- Has effective H&S management systems designed to drive improvement, encourage H&S cultural growth, and increase engagement and communication.
- Has necessary leadership in place to provide sufficient resources and to ensure that H&S risks are appropriately managed.
- Includes Health and Safety in the appraisal of staff, and rewards accordingly.
- Complies with regulatory requirements,
- Carries out operations in accordance with industry standards and relevant codes of practice.
- Requires contractors to manage H&S in line with this policy and uses its influence to promote it in other ventures.

Our main priority is always to ensure that everyone is provided with a safe working environment.

Adam Holland

CEO

Mpac Group Health & Safety Policy

Who does this policy apply to?

This policy applies to all employees and contractors worldwide.

What about local site policies, procedures, and other requirements?

This Group Policy provides a high-level framework to support the development and implementation of local health and safety management systems. Each site must maintain detailed policies, procedures, and standards that comply with applicable local legislation.

Where Group Policy requirements exceed local legal obligations, the Group Policy sets the minimum standard. This ensures consistent expectations and performance across all Mpac operations globally.

Global Leadership and Oversight

Health and Safety is not managed in isolation at individual sites — it is a global function that requires shared responsibility and alignment. The Global Head of SHEQ (Safety, Health, Environment & Quality) is responsible for overseeing the health and safety strategy across all regions. This includes:

- Ensuring a consistent approach to health and safety risk management and compliance across sites.
- Driving the development and deployment of group-wide standards, tools, and processes.
- Facilitating cross-site learning and the sharing of best practices.
- Supporting local leadership in embedding a culture of safety aligned with Mpac's strategic objectives.
- Ensuring that health and safety is embedded into the global decision-making process.

What is expected of Senior Leadership?

Managing Directors (MDs) and Senior Leadership Teams (SLTs) are responsible for health and safety performance and must:

- Ensure full adherence to this policy at all times.
- Lead by example — follow and promote safety procedures, processes, and standards.
- Actively identify hazards and near misses, and take prompt corrective actions.
- Engage their teams in health and safety performance improvements.
- Incorporate health and safety considerations into objective-setting and business decision-making.
- Recognise and reward positive health and safety behaviours and outcomes.

What is expected of all Employees?

While Mpac provides the systems, leadership, and support to enable safe working environments, all employees play a critical role in contributing to a strong safety culture.

All employees are expected to:

- Take reasonable care of their own health and safety and that of others who may be affected by their actions.
- Follow all relevant safety procedures, instructions, and training provided.
- Promptly report hazards, unsafe behaviours, near misses, and incidents through the appropriate channel.
- Stop work if they believe it cannot be completed safely and raise the concern with their supervisor or H&S representative.
- Participate in health and safety training, discussions, and improvement initiatives.
- Use all equipment and personal protective equipment (PPE) as required and intended.

Substance Misuse

Substance misuse—including the inappropriate or unsafe use of alcohol, prescription medications, or illegal drugs—can significantly affect health, safety, and workplace performance. Mpac is committed to maintaining a safe, healthy, and productive environment across all operations worldwide.

Employees are expected to be fit for duty at all times and free from the influence of substances that could impair judgment, coordination, or performance. Substance misuse increases the risk of accidents, reduces overall wellbeing, and may contravene local laws.

Mpac will:

- Reserve the right to conduct testing where we have reasonable grounds to suspect misuse of alcohol or substances that could affect your ability to work safely. Any such testing will be carried out in full compliance with all relevant national and local legislation concerning alcohol, drugs, and controlled substances.
- Prohibit the possession, distribution, or use of illegal drugs, as well as the misuse of alcohol or prescription medications, in the workplace or while conducting company business.
- Promote employee health and wellbeing by encouraging the responsible use of medications, providing access to assistance programs where legally available, and offering education on substance misuse.
- Respond fairly and consistently to violations, while respecting cultural and legal differences across regions.

Employees are encouraged to seek support if they are experiencing difficulties related to substance use. Mpac will treat such requests with confidentiality and provide assistance within the framework of local laws and available resources.

Failure to Follow This Policy

Non-compliance with this policy may lead to disciplinary action, up to and including dismissal. Examples of unacceptable behaviour include:

- Deliberate breaches of this policy.
- Failure to report a known or suspected breach.
- Encouraging or coercing others to breach the policy.

Governance

Leadership & Reporting

The Managing Directors and Senior Leadership teams are responsible for health and safety performance at Mpac. With support from the Global Head of SHEQ, each site must provide monthly performance metrics and narrative updates to the Executive Committee. Both qualitative and quantitative data will be reviewed to assess alignment with policy objectives and progress toward continuous improvement.

Standards and Control of Risk

Mpac maintains a health and safety management system underpinned by clearly defined standards and an effective risk management framework. These systems are designed to identify, assess, mitigate, and demonstrate control of risk at all operational levels.

Assurance

Performance is evaluated through internal audits conducted by externally trained personnel. Where applicable, additional audits are carried out by regulators or independent third parties. Actions arising from audits will be tracked to closure through a structured audit schedule.

Continuous Improvement

The Global Head of SHEQ facilitates a global Health and Safety Committee, connecting health and safety professionals from each site. This group meets regularly to:

- Share lessons learned and best practices.
- Identify and prioritize global improvement initiatives.
- Collaboratively develop and deploy standards, tools, and communication strategies that address specific risk areas and improve safety culture across all sites.

Management System Standards

Mpac's Health & Safety (H&S) Management System comprises 12 integrated standards structured around a central core standard: Risk Management. This core is supported by 3 controlling measures and 8 supporting processes that collectively ensure effective H&S governance across all operations.

Core Standard: Risk Management

The Risk Management system is designed to identify, assess, manage, and demonstrate control of risks. Key expectations include:

- Hazards and near misses must be identified, recorded, and appropriate controls implemented promptly.
- Risk assessments and safe working procedures will be documented to clearly define risk controls and mitigation measures for all work environments, both on-site and off-site.
- Risk assessments shall apply the hierarchy of controls, prioritizing inherently safer options such as elimination or reduction wherever practicable.
- Controls and mitigation measures will be regularly monitored to ensure they remain effective, functional, and fit for purpose.

The 3 Controlling Measures

Leadership and Commitment

- The Global Head of SHEQ will establish, document, and communicate clear H&S goals and objectives throughout the group.
- Managing Directors (MDs), supported by appointed H&S representatives and Senior Leadership Teams (SLTs), are responsible for achieving these goals.
- Management at all levels will demonstrate visible, active leadership through behaviours and actions that foster a positive H&S culture.

Planning, Organisation, and Communication

- H&S management systems will be clearly documented to ensure that processes and plans are communicated and well understood.
- Structured monthly business reviews at site and Executive Committee levels will monitor progress and communicate plans and actions.
- Action tracking systems will record tasks, monitor progress, and confirm completion, including activities conducted on-site.
- Resources will be reviewed regularly to confirm adequacy for meeting H&S goals and objectives.
- Each site will employ a competent individual(s) responsible for H&S, with this role formally documented.

Audit and Review

- Internal audits will be conducted continuously, complemented by external audits from approved regulators at least bi-annually, to assess the effectiveness of the H&S management system.
- An audit schedule will ensure all processes and procedures are reviewed at appropriate intervals.
- Continuous improvement plans will be developed based on audit outcomes and tracked to completion.

The 8 Supporting Processes

People, Training & Competency

- Employees will be recruited, trained, and developed to effectively fulfil their H&S responsibilities.
- Each site will establish a safety council with defined responsibilities and continuous improvement strategies.
- Systems will identify required H&S accountabilities and competencies to inform recruitment and development.
- Employee inductions will include H&S awareness to ensure immediate understanding of site safety expectations.
- Ongoing training and development programs will maintain and enhance H&S competence.

Compliance & Knowledge

- A document control system (e.g., SharePoint, BMS, SafetyQube) will manage key H&S documents and records throughout their lifecycle.
- Document retention periods will be clearly defined and adhered to.
- Procedures will ensure timely updates on relevant legislation, internal policies, standards, and regulations affecting H&S.
- Managers will have access to current knowledge and resources necessary for compliance.

Engineering & Project Management

- A management of change procedure will govern organisational, technical, and procedural changes resulting from projects or developments.
- Project management procedures will cover the entire lifecycle to ensure H&S requirements are integrated.
- Technical standards will ensure engineering changes comply with local conditions, regulations, and operational needs.
- Facilities will be designed, constructed, and maintained in compliance with codes of practice, standards, and regulatory requirements.

Operations & Performance

- Operating procedures will be developed and regularly reviewed with employee involvement.
- Safe operating limits for equipment will be clearly defined and documented.
- All operational activities will have defined safe systems of work and precautionary measures.

Learning from Events

- A consistent process will ensure reporting and investigation of all incidents, hazards, and near misses.

- Root cause analysis will identify underlying issues, corrective actions will be implemented, and learnings communicated across the organisation to drive continuous improvement.

Emergency Preparedness

- Adequate resources will be allocated to manage and recover from emergencies and crises effectively.
- Emergency response plans will be regularly tested and updated as necessary.
- External agencies will be consulted where their involvement is required in emergency planning.

Asset Management

- Maintenance programmes will ensure physical assets remain fit for operational and safety performance throughout their lifecycle.
- Asset registers will be maintained and kept current at all sites.
- Inspection and maintenance schedules will reflect asset risk profiles and regulatory requirements.

Contracted Services

- Contractor operations will be managed to ensure they meet acceptable H&S performance levels.
- Robust systems will manage contractor selection, engagement, and assurance processes.
- Only approved contractors will be permitted to undertake work affecting H&S standards and performance.