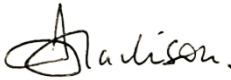


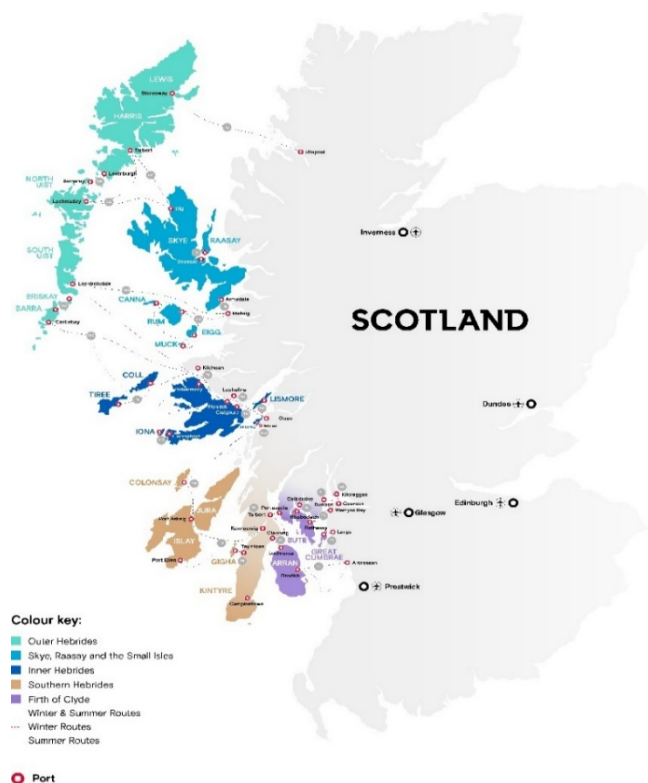
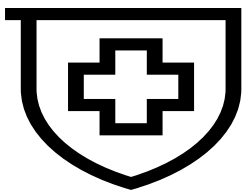


Health and Safety Policy

Policy No: SP0003

Effective Date	14 May 2018
Revision Number	10
This Revision Status	Final
Next Review Date	14 May 2027
Summary Purpose	Written Statement of General Policy with respect to the health & safety at work of our employees, and, the organisation and arrangements in force for the time being for carrying out the policy and bring the statement and any revision to the notice of all employees
Summary Scope	All employees, consultants, contractors, customers, and visitors.
Policy Owner	Chief Executive Officer (managed by Dir Standards & Performance)
Signature	

DML Board Approved 14 May 2025





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1. PURPOSE

Health and Safety is a core value for all the companies in the David MacBrayne Group.

We recognise our moral, legal and financial responsibilities, recognising that Health and Safety is critical in every aspect of our business and must be at the heart of everything we do.

The Company (meaning David MacBrayne Limited, CalMac Ferries Limited, Caledonian MacBrayne Crewing (Guernsey) Limited and David MacBrayne HR (UK) Limited) recognises its duties under current health and safety legislation, PMSC and the ISM Code, we commit to meet the requirements of this legislation and maintain a safe and healthy work environment.

A high standard of Health and Safety performance is a key objective and is recognised as an integral part of service delivery.

We also acknowledge our responsibilities in respect of persons other than our employees and value the health, safety and wellbeing of every colleague, customer, local community, contractor, and business partner we employ or support.

2. SCOPE

This policy applies to all employees, consultants, contractors, customers, visitors and all other relevant external stakeholders.



3. POLICY

3.1 Statement of Intent

The Board of Directors, Chief Executive Officer and Executive Team shall operate the HSEQ Committee to oversee the governance of health and safety as per the published terms of reference in the Group Management Manual.

We recognise our duty to make regular assessment of the hazards and risks created during our business and have defined the arrangements and responsibilities for this within our Company Management System.

We also recognise our duty, so far as is reasonably practicable to:

- Meet our legal obligations to maintain safe and healthy working conditions
- Have access to competent advice
- Provide resource requirement to make this policy and our Health and Safety arrangements effective
- Provide adequate control of the health and safety risks identified
- Create and maintain a positive Health and Safety culture which secures the commitment and participation of all employees
- Fostering a culture where health and safety is seen as everyone's responsibility
- Consult with our employees on matters affecting their health and safety
- Provide and maintain safe plant and equipment
- Ensure the safe handling and use of substances
- Ensure the maintenance of any place of work under our control is in a condition that is safe and without risks to health and the provision and maintenance of means of access and egress, are safe and without such risks
- Provide information, instruction, training and supervision, where applicable, that is suitable and sufficient
- Ensure that all workers are competent to do their work, and to give them adequate training
- Prevent accidents and cases of work-related ill health by promoting open communication and encouragement to report safety concerns, incidents and near misses
- Actively manage and supervise health and safety at work
- Provide access to occupational health and wellbeing services for all employees
- Seek continuous improvement in our health and safety performance and management through regular (and at least annually) review and revision of this policy
- Continuously improve our safety management system through regular review and monitoring

Safety Culture

The company will ensure that Health and Safety is an integral part of the overall management culture and seek to develop a positive attitude to Health and Safety amongst all employees by,

- (a) Visibly demonstrating a clear commitment to improving Health and Safety performance
- (b) Promoting co-operation by recognising that all staff have an important contribution to make to effective Health and Safety Management and providing opportunities for participation and



involvement in Health and Safety activities e.g. Quality Improvement Teams, Safety Meetings, Risk Assessment, etc

- (c) Ensuring the communication of necessary information throughout the company
- (d) Securing the competence of employees by:
 - (i) Including Health and Safety in recruitment, induction and onboarding procedures
 - (ii) Implementing systems which will clearly identify Health and Safety training needs arising from recruitment or changes in staff, procedures, or systems of work

3.2 Our Safety Responsibilities

Leadership and Management

The Board of Directors are committed to ensuring effective health and safety management and take full responsibility for providing a healthy, safe and secure working environment for everyone.

To achieve this we will define the **Responsibilities and Arrangements** to ensure that our statement of intent (Section 3.1) is understood by the CEO, all Executive Members; Heads of Department; Senior Managers; Managers; Supervisors and Employees

The Chief Executive Officer has ultimate responsibility for ensuring that the Health and Safety Policy is implemented effectively through the directorates and their respective Directors/Chief Operating Officer.

This will be achieved by Executive Directors,

- (a) Detailing the organisation of the company through which the Policy will be implemented and delegating the responsibility for implementation of the Policy within each department to individual directorates, Heads of Department, Senior managers and through them directly to relevant staff throughout the organisation
- (b) Ensuring that adequate resources are made available to enable the Policy to be implemented
- (c) Ensuring that Health and Safety is an integral part of the overall management culture and developing a positive attitude to Health and Safety amongst employees by visibly demonstrating their own commitment to achieving a high standard of Health and Safety performance
- (d) Ensuring Competent Person/s are responsible for applying the provisions of Health and Safety Legislation
- (e) Ensuring the establishment and maintenance of Health and Safety management systems within the company for the assessment of risks and the effective planning, organisation, control, monitoring and review of the preventive and protective measures necessary to control the risks
- (f) Ensuring that employee development programmes adequately address the requirement for Health and Safety Management skills and knowledge



- (g) Communicate openly with employees about health and safety matters and invite regular feedback
- (h) Recognise and reward good safety practices throughout the organisation

Heads of Department

Are responsible for ensuring the Health and Safety at work of all Employees in their respective sections.

In particular they shall,

- (a) Set out the organisation within their department through which the Policy will be implemented
- (b) Set out the arrangements which detail how the aims listed in Section 3.1 will be met
- (c) Ensure that adequate resources are made available to enable the arrangements to be implemented
- (d) Visibly demonstrate commitment to achieving a high standard of Health and Safety performance within their department and develop a positive attitude to Health and Safety among employees
- (e) Implement Health and Safety Management Systems within their section which will ensure the assessment of risk and the effective planning, organisation, control, monitoring and review of the preventative and protective measures necessary to eliminate or control the risks
- (f) Assess the Health and Safety training needs of all employees and ensure, so far as is reasonably practicable, that all are equipped with adequate skills and knowledge to undertake their work without risk to their own or others, Health and Safety
- (g) Encourage and enforce adherence to our **Life Saving Rules**

All Employees

Every employee plays a vital role in creating a safe working environment and is encouraged and expected to co-operate in the implementation of the company Health and Safety Policy by,

- (a) Acting in the course of their employment with due care for their own safety and that of others, who may be affected by their acts or omissions at work
- (b) Co-operating, so far as is necessary, to enable the company to perform any duty or to comply with any requirements, as a result of any Health and Safety Legislation which may be in force
- (c) Using correctly all work items provided by the company in accordance with the training and the instructions they have received to enable them to use the items safely
- (d) To bring to the attention of their employer any work situation which they believe might present a serious and imminent danger to themselves or others



- (e) Contribute to maintaining a positive safety culture by supporting the principles outlined in this policy
- (g) Adhering to our **Life Saving Rules**
- (f) Intervening to address unsafe behaviours or conditions at any level and use **Stop Work Authority (SWA)** to halt any activity or situation that poses a risk to health or safety
- (g) Report safety concerns, accidents, and near misses to management immediately
- (h) Contribute to maintaining a positive safety culture by supporting the principles outlined in this policy

3.3 Arrangements for Health and Safety

This Health and Safety Policy statement is supported by the Company Management System, which details the organisation and arrangements in force to ensure that the aims of this Policy are met. The overarching arrangements begin with the Group Management Manual and are detailed comprehensively in the Health, Safety and Environment Manual (HSEM).

4. DOCUMENT REVIEW

The Policy Owner is responsible for reviewing this document in consultation with other members of the Executive.

Notwithstanding above, all personnel have a responsibility to use this document critically and to forward any suggestions for its improvement through management line or use the [Feedback](#) function in the SharePoint Company Management System.

5. DOCUMENT CHANGE INFORMATION

The table below notes the changes made since the document was previously published.

Date change	of What changed	Who changed (title)	Who changed (name)
September 2022	Addition of DSM Code, branding updated	Head of Safety & Security	Will Lins
November 2022	Approval name change from Duncan Mackison to Robbie Drummond	Head of Safety & Security	Will Lins
17 October 2023	Policy title changed from HSQE 0003 to SP003 (ref OpEx organisation change 01 Oct	Director of Standards & Performance	Louis de Wolff



2023);branding template used – no other material content change.

08 January 2025	Reorganised structure for improved clarity; enhanced emphasis on shared safety culture, introducing "Stop Work Authority (SWA)", expanded responsibilities for leadership and employees; updated tone and terminology to reflect modern safety practices; Policy number changed from SP0003 to SC0007	Director of Standards & Performance	Louis de Wolff
May 2025	Reorganised policy statement to provide overarching H&S Policy to include clear Statement of Intent; Responsibilities; Arrangements	Director of Standards & Performance	Alex Cross
January 2026	Addition of CEO Signature; Updated Section 3.1 to include means of egress; Updated Section 3.2 to clarify previous paragraph statement "This will be achieved by Executive Directors"	Director of Standards & Performance	Alex Cross
