# Health & Safety Policy

Level 2 Policy

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| **Document Number** | MTM-POL-002 |
| **Document Title** | Health & Safety Policy |
| **Version** | 6 |
| **Effective Date** | 1 September 2026 |
| **Next Review Date** | 1 September 2027 |
| **Document Owner** | Wayne Crawford, Managing Director |
| **Approved By** | Wayne Crawford, Managing Director |

## Version History

| Version | Date | Author | Summary of Changes | Approved By |
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| 1 | 25/11/2024 | Faction Health and Safety Group Ltd (competent H&S advisor) / W. Crawford | First issue — a full 108-page Health & Safety Policy and management arrangements document, professionally authored by Faction Health and Safety Group Ltd as a generic multi-trade template and signed without company-specific tailoring. Superseded in full by the rewrite below. | W. Crawford |
| 2 | 18/07/2026 | Draft prepared for, and approved by, W. Crawford | Complete rewrite, scoped specifically to Matrix TM's actual operations as a temporary traffic management (TM) contractor rather than a generic multi-trade construction policy. Aligns responsibilities with the Company's current governance structure (Operations Manager, Commercial Director, Director roles). Explicitly scopes out CDM Principal Designer/Client duties, asbestos, confined space entry, scaffolding erection, hot work, and Building Safety Act content that do not apply to the Company's work. Removes an erroneous reference to a third-party company ("Costain") found in the previous version. Correctly identifies the Regulation 7 competent-advisor arrangement as be Accredited (trading name of Faction Health & Safety Group Ltd); notes this support contract itself expired 23 Nov 2025 per its Certificate of Services and must be renewed. Reviewed and approved by the Managing Director; renewal of the advisor contract and a competent health and safety advisor review of this content remain recommended given the safety-critical nature of this document. | Wayne Crawford |
| 3 | 20/07/2026 | W. Crawford | Formally named the Company's Health & Safety Management System "HSMS 1" in Section 1 below (clarification only; no change to policy intent, scope or approval). The number 1 is reserved for this, the Company's sole H&S Management System at present, so any future additional system (e.g. for a different region, subsidiary, or client framework) can be numbered HSMS 2 and onward without renumbering this one. | Wayne Crawford |

| Version | Date | Author | Summary of Changes | Approved By |
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| 4 | 01/09/2026 | W. Crawford | Replaced the Company's retained competent health and safety advisor arrangement (previously be Accredited, trading name of Faction Health & Safety Group Ltd) in Section 3.3 and the Responsibilities table (Section 4). The Company's competent person for health and safety under Regulation 7 of the Management of Health and Safety at Work Regulations 1999 is now named as Dennis Pollard, holding NEBOSH, a ProQual Level 6 NVQ Diploma in Occupational Health and Safety, and IOSH Managing Safely. | Wayne Crawford |
| 5 | 01/09/2026 | W. Crawford, on the advice of Dennis Pollard (Health & Safety Manager, Oakstone Contracting Ltd) | Corrected Section 3.2, following a review of this policy by Dennis Pollard. Temporary traffic management on the public highway does not meet the definition of construction work under the Construction (Design and Management) Regulations 2015 (CDM 2015) — it is regulated instead under the New Roads and Street Works Act 1991, Traffic Signs Regulations and General Directions 2016, and the Traffic Signs Manual Chapter 8. The previous wording, which stated the Company complies with CDM 2015 duties as a Contractor or Principal Contractor, was inaccurate and has been replaced with a clear statement that CDM 2015 does not apply to Matrix TM's operations and that the Company holds no duty-holder role under those Regulations. | Wayne Crawford |
| 6 | 01/09/2026 | W. Crawford | Added Dennis Pollard's job title (Health & Safety Manager, Oakstone Contracting Ltd, a sister company of Matrix TM) and contact email (Dennis.pollard@oakstonecontracting.com) to Section 3.3 and the Responsibilities table (Section 4), to support accreditation and client due-diligence requirements for named competent-advisor contact details. | Wayne Crawford |

# Statement of Intent

As Managing Director of Matrix Traffic Management Ltd ("Matrix TM", "the Company"), I have overall accountability for this Health & Safety Policy and for the health, safety and welfare of everyone affected by the Company's work — our employees, subcontractors, clients, and members of the public who encounter our traffic management.

I am personally committed to:

- Providing the leadership, resources and support needed to implement this policy effectively across every part of the Company's operations.
- Ensuring the Company complies with all applicable health and safety legislation and other requirements relevant to its work as a temporary traffic management contractor.
- Consulting with employees and subcontractors on matters affecting their health and safety, and providing the training, instruction and supervision they need to work safely.
- Providing and maintaining a Health & Safety Management System (HSMS 1) appropriate to the nature and scale of the Company's operations, and reviewing it regularly to ensure it remains effective.
- Taking seriously, investigating, and learning from every accident, incident and near miss, and using those lessons to prevent recurrence.
- Seeking continual improvement in the Company's health and safety performance year on year.

This Statement of Intent, and the policy it introduces, will be communicated to all employees, subcontractors and other interested parties, and will be reviewed at least annually or sooner if circumstances require.

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| Signature | wayne crawford |
| Name | Wayne Crawford |
| Position | Managing Director |
| Date | 1 September 2026 |

To be signed by the Managing Director; the signed copy supersedes this unsigned page for audit and accreditation purposes.

# 1. Purpose

This policy sets out how Matrix Traffic Management Ltd ("Matrix TM", "the Company") manages, complies with, and implements health, safety and welfare requirements relevant to its actual operations, and the associated legislation, regulations and client requirements.

This policy, together with its supporting risk assessments, method statements (RAMS), procedures and registers, constitutes the Company's Health & Safety Management System, formally named HSMS 1. HSMS 1 is the Company's sole Health & Safety Management System at present; the numbering allows for additional systems to be introduced in future (for example, for a different region, subsidiary, or client-specific framework) without renumbering this one.

Matrix TM recognises that health, safety and welfare are integral to the professional delivery of temporary traffic management services, and that it is everyone's responsibility to contribute to the highest standards of accident and incident prevention — for our own workforce, our clients, and members of the public who encounter our traffic management.

This policy replaces the Company's previous Health & Safety Policy (originally issued at Version 1.0 on 25 November 2024, a generic template produced by Faction Health and Safety Group Ltd), rewritten to reflect Matrix TM's actual scope of work, its current management structure, and the rest of the Company's Integrated Management System (IMS).

# 2. Scope

This policy applies to all Matrix TM employees, agency workers and subcontractors while engaged on Company business, and to all premises, vehicles, plant and equipment under the Company's control.

Matrix TM designs traffic management layouts to approved standards, and supplies, installs, maintains and removes temporary traffic management (TM) equipment — signs, cones, barriers, portable and temporary traffic signals, hazard warning lights, road studs and associated apparatus — on the public highway and on construction, utility and event sites throughout the UK, typically as a specialist subcontractor engaged by principal contractors, utility companies, local authorities and event organisers.

This policy sets out how Matrix TM manages the health, safety and welfare risks that are genuinely present in that work. Section 3.2 below lists activities that fall outside the Company's normal scope of operations and are therefore outside the scope of this policy.

# 3. Policy Statement

## 3.1 Leadership & Commitment

The Managing Director holds overall accountability for this policy, commits the resources needed to implement it, and expects everyone working on the Company's behalf to apply the same standard of care whether on a quiet rural road or a live motorway.

- Provide, so far as reasonably practicable, safe systems of work and safe traffic management operations.
- Ensure sufficient welfare facilities are confirmed available at every site before work starts.
- Provide and maintain safe access to and egress from every workplace under the Company's control.

- Communicate this policy, and any related instruction, to all employees, agency workers and subcontractors.
- Provide training, instruction and supervision appropriate to the individual's role.
- Provide means of consultation on health and safety matters for all employees.
- Provide and display this policy, and allocate the financial and other resources needed to achieve these commitments.

## 3.2 Activities Outside the Scope of This Policy

Matrix TM's core activity is planning, installing, maintaining and removing temporary traffic management on the public highway. This work does not meet the definition of construction work under the Construction (Design and Management) Regulations 2015 (CDM 2015); it is regulated instead under the New Roads and Street Works Act 1991, Traffic Signs Regulations and General Directions 2016, and the Traffic Signs Manual Chapter 8. CDM 2015 accordingly does not apply to Matrix TM's operations, and the Company does not act as Client, Principal Designer, Designer, Contractor or Principal Contractor under those Regulations.

The Company does not carry out the following activities, and this policy does not cover them: asbestos removal or asbestos-disturbing work; confined space entry; erection or significant alteration of scaffolding (where temporary works designed and erected by others are used, the Company follows the instructions of the appointed Temporary Works Coordinator); hot work such as welding, cutting or brazing; and work on the structural fabric, cladding, or fire safety systems of buildings covered by the Building Safety Act 2022.

If Matrix TM is ever asked to undertake work falling into any of the categories above, it will engage a specialist, competent subcontractor to carry out that work rather than perform it using its own workforce.

## 3.3 Legal Compliance & Competent Advice

Applicable legislation is tracked on the Legal Register (MTM-REG-008) and includes the Health and Safety at Work etc. Act 1974, Management of Health and Safety at Work Regulations 1999, CDM 2015, New Roads and Street Works Act 1991, Traffic Signs Regulations and General Directions 2016 and Traffic Signs Manual Chapter 8, Road Traffic Act 1988, Working Time Regulations 1998, Environmental Protection Act 1990, RIDDOR, COSHH Regulations, and PPE Regulations.

The Company retains Dennis Pollard as its competent person for health and safety under Regulation 7 of the Management of Health and Safety at Work Regulations 1999. Dennis Pollard is Health & Safety Manager at Oakstone Contracting Ltd, a sister company of Matrix TM, and holds NEBOSH, a ProQual Level 6 NVQ Diploma in Occupational Health and Safety, and IOSH Managing Safely. He provides specialist advice, supports investigation of high-potential or reportable incidents, and assists with the periodic review of this policy, and can be contacted at Dennis.pollard@oakstonecontracting.com.

## 3.4 Consultation & Communication with Employees

Employees are consulted on health and safety matters through an open-door policy with Supervisors and management, and through regular toolbox talks recorded on the Toolbox Talk Record (MTM-FRM-006). Operative-facing documents, including this policy and current RAMS, are made available via the ConeRQ app document library.

Safety alerts are issued via ConeRQ, or verbally where urgent, whenever a new hazard or a lesson from a near miss is identified. Employees are encouraged to raise suggestions or concerns with their Supervisor or, where appropriate, via the Speak Up (Whistleblowing) Policy (MTM-POL-005).

## 3.5 Risk Assessment & Method Statements

Every job is covered by a site- and task-specific risk assessment and method statement (RAMS), completed digitally in the ConeRQ app and based on an approved Traffic Management Plan or CAD drawing prepared in line with Chapter 8 of the Traffic Signs Manual and TSRGD 2016.

RAMS are briefed to the site team before work starts, with the briefing recorded on MTM-FRM-006, and are reviewed if site conditions change materially. Generic risk assessments may be used for routine, lower-risk tasks; a site-specific assessment is required for anything non-routine or higher-risk — for example live carriageway working, high-speed roads, or night work — or where a client requires it.

## 3.6 Traffic Management Operations & Protection of the Public

This is the Company's core activity and its most significant area of risk. Signs, cones, barriers and portable/temporary traffic signals are set up and removed only in accordance with the approved Traffic Management Plan or drawing, and Supervisors verify the installed layout matches that drawing before the site is opened to traffic.

High-visibility clothing of the appropriate class is worn at all times on or near the highway, and vehicle-mounted signage or impact-protection vehicles are used for lane closures in line with Chapter 8. Additional precautions (lighting, fatigue management) apply to night work. Safe, signed pedestrian routes are maintained at all times, with particular care taken for vulnerable road users such as pedestrians with visual or mobility impairments, cyclists, and school routes.

Operatives hold the sector-recognised competence appropriate to their role, tracked on the Training Matrix (MTM-REG-002). Any near miss or member-of-the-public incident is reported per Section 3.20 below.

## 3.7 Underground & Overhead Services

Before excavating for post or sign foundations, the location of buried services is established using cable avoidance tool (CAT) scanning, carried out either with equipment supplied and maintained — including any required calibration — by a specialist subcontractor or hire company, or by a subcontractor competent in service location. Matrix TM does not itself own or hire any equipment that requires calibration; the Calibration Register (MTM-REG-007) confirms this and is reviewed at each Management Review. A permit to dig is obtained where required by the client or highway authority.

Where signage, gantries or barriers are erected near overhead power lines, a minimum safe clearance is maintained, and the relevant network operator is contacted before work proceeds if this clearance cannot be guaranteed.

## 3.8 Vehicle & Driving Safety

Company vehicles are maintained to a roadworthy standard and checked daily by the driver before use, with any defect reported immediately to a Supervisor. Drivers hold a valid licence appropriate to the vehicle and trailer combination in use. TM equipment is loaded and secured in line with manufacturer and vehicle guidance, and reversing/banksman procedures are used at sites with restricted visibility. Mobile phone use while driving is prohibited other than via an approved hands-free system, consistent with the Company's expectations for safe and lawful use of Company equipment under the Information Security Policy (MTM-POL-009).

## 3.9 Equipment Safety & Maintenance

All TM equipment — signs, cones, barriers, portable/temporary traffic signals, generators, lighting — is subject to a pre-use visual check by the operative deploying it, and is logged on the Equipment Register (MTM-REG-006), which records condition, next-inspection-due dates, and location.

Portable and temporary traffic light controllers used by the Company are owned and maintained, including any calibration, by the hire company supplying them, under that hire company's own maintenance regime — Matrix TM does not own or hire any equipment requiring calibration (MTM-REG-007). Any equipment found defective is taken out of service immediately, tagged, and reported to a Supervisor.

### 3.10 Manual Handling

Cones, barriers, signs and associated TM equipment are, where reasonably practicable, moved using trolleys, wheeled cages or vehicle tail-lifts rather than carried manually. Where manual handling cannot be avoided, team lifting is used for heavier or awkward items, and operatives are trained in safe lifting technique and in assessing the task, individual, load and environment (TILE) before attempting a lift.

### 3.11 Personal Protective Equipment (PPE)

Minimum PPE for site work is high-visibility clothing of the appropriate class, safety footwear, and gloves. Additional PPE — eye protection, hearing protection, or a hard hat where required by a client's site rules — is provided based on the task risk assessment. PPE is provided free of charge, and operatives are trained in its use, storage and inspection. A Supervisor withdraws any individual from site who is not wearing the required PPE until the position is corrected.

### 3.12 Lone Working

Some Company activities — early-morning or night-time sign setup/removal, or remote rural sites — may involve lone working. Where this is necessary, the Operations Manager confirms the individual is competent and fit for the task and is equipped with a means of communication, and a personal alarm where the risk assessment identifies a need. A check-in arrangement is agreed before the task starts, with an escalation route if a lone worker cannot be reached.

### 3.13 Work at Height

The Company's exposure to work at height is limited, and is generally restricted to using stepladders or podium steps to erect elevated signage or gantry boards at low level. Ladders and steps are visually checked before use and are used only for short-duration, low-risk tasks, in line with the hierarchy in the Work at Height Regulations 2005 (avoid the work, use collective protection, use the appropriate access equipment). The Company does not use mobile elevating work platforms (MEWPs) or scaffolding with its own workforce; where a task requires this, a specialist, competent subcontractor is engaged.

### 3.14 Electrical Safety

Site electrical equipment is limited mainly to generators, battery or solar lighting units, and portable traffic signal control units. Matrix TM does not carry out live electrical work, and its employees do not access the internals of hired traffic light controllers — maintenance and, where applicable, calibration of that equipment remains the hire company's responsibility. Portable appliances used in the office, and any site power tools, are subject to periodic visual checks and, where appropriate, PAT testing.

### 3.15 Noise & Vibration

Generators and hand tools — for example post drivers (“whackers”) used to drive in sign posts — can expose operatives to noise and hand-arm vibration. Hearing protection is provided where the task risk

assessment identifies a need. Vibration exposure is managed by limiting continuous trigger time, rotating tasks between operatives, and monitoring for early symptoms of hand-arm vibration syndrome (HAVS) through the Company's health surveillance arrangements.

### 3.16 Control of Substances Hazardous to Health (COSHH)

Substances used in the Company's operations are limited mainly to fuel and diesel for generators and vehicles, screen wash, and cleaning or degreasing products used in equipment maintenance. Safety data sheets are held for all such substances, and COSHH assessments identify the necessary control measures — ventilation, PPE, safe storage, and spill kits carried in vehicles.

### 3.17 Fire Safety

Office premises have a fire risk assessment, means of escape, and fire extinguishers appropriate to the risk, checked periodically. On site, fire risk is managed primarily around fuel storage and generators: extinguishers are carried on TM vehicles, refuelling is carried out with the engine off and away from ignition sources, and smoking is prohibited near fuel or other flammable materials.

### 3.18 First Aid

The office holds a first aid kit and a nominated first aider. Site vehicles carry a first aid kit appropriate to lone or small-team working, and operatives are made aware of the nearest hospital with an A&E department for the site they are working at, particularly for out-of-hours or remote locations.

### 3.19 Occupational Health, Fatigue & Welfare

Working hours, particularly for night shifts, are managed with regard to the Working Time Regulations 1998 and fatigue risk, with rest breaks scheduled between shifts. Operatives are encouraged to report fatigue or ill health that could affect safe working. Welfare facilities — toilets, washing facilities, and a place to take breaks and prepare food or drink — are confirmed as available, whether the Company's own arrangements or those provided by a client or principal contractor on whose site the Company is working, before work starts on any site.

### 3.20 Accident, Incident & Near-Miss Reporting

All accidents, incidents and near misses, however minor, are reported to a Supervisor and recorded without delay. Investigation, RIDDOR reportability, and any resulting corrective or preventive action follow the Non-Conformance Procedure (MTM-PROC-010) and Corrective Action Procedure (MTM-PROC-004): site-based issues are investigated by the Operations Manager (Brandon Drysdale) and administrative or commercial issues by the Commercial Director (Thomas Bradbury). High-potential or reportable incidents are additionally reviewed with the Company's competent health and safety advisor.

### 3.21 Young Persons & New or Expectant Mothers

A specific risk assessment is carried out before any young person (under 18) or new or expectant mother is allocated work, taking account of their particular vulnerabilities — inexperience, physical development, or pregnancy-related risk — and their duties are adjusted accordingly.

### 3.22 Subcontractors & Suppliers

Subcontractors and suppliers engaged by the Company are expected to work to a standard consistent with this policy while on Company business, per the Supplier & Subcontractor Approval Policy (MTM-POL-011) and the Supplier Code of Conduct (MTM-POL-015). Smaller suppliers without a written health and safety policy of their own may operate under Matrix TM's Health & Safety Policy and site

RAMS, recorded on the Supplier Approval Form (MTM-FRM-001).

### 3.23 Training & Competence

Operatives and Supervisors hold the training and competence appropriate to their role — for example sector-recognised TM qualifications, first aid, and manual handling — tracked on the Training Matrix (MTM-REG-002) in line with the Training & Competence Policy (MTM-POL-010) and Training Procedure (MTM-PROC-008). The Managing Director identifies training needs and approves training investment.

### 3.24 Monitoring, Audit & Review

Compliance with this policy is monitored through Supervisor site checks, internal audits carried out at least quarterly by the Managing Director against the Internal Audit Procedure (MTM-PROC-002) and reviewed by Paul Eastall (Director) for independent oversight, and Management Review (MTM-PROC-003) held at least annually.

This policy itself is reviewed at least annually, or sooner following an internal audit finding, an incident, or a material change in legislation, accreditation requirements, or the Company's operations, with input from the Company's competent health and safety advisor.

## 4. Responsibilities

### Managing Director (Wayne Crawford)

Holds overall accountability for this policy, approves it and the resources needed to implement it, and chairs the Management Review at which health and safety performance is reviewed.

### Operations Manager (Brandon Drysdale)

Manages day-to-day site safety, verifies TM setups against approved drawings, and investigates corrective actions and non-conformances relating to site-based health and safety issues.

### Commercial Director (Thomas Bradbury)

Oversees administrative and commercial aspects of health and safety compliance (insurance, accreditation, supplier vetting) and investigates corrective actions and non-conformances relating to administrative or commercial health and safety issues.

### Director (Paul Eastall)

Provides independent oversight of health and safety matters concerning the Managing Director personally, and reviews Internal Audit Reports.

### Supervisors

Conduct daily briefings and toolbox talks, verify TM setups match approved drawings, oversee on-site safety and welfare, and record accidents, incidents and near misses without delay.

### Operatives

Work in accordance with training, RAMS and this policy, use PPE correctly, carry out pre-use equipment checks, and report hazards, incidents and near misses immediately.

### Competent Health & Safety Advisor (Dennis Pollard, Health & Safety Manager, Oakstone Contracting Ltd — NEBOSH, ProQual Level 6 NVQ Diploma in Occupational Health and Safety, IOSH Managing Safely)

Provides specialist health and safety advice under Regulation 7 of the Management of Health and Safety at Work Regulations 1999, supports investigation of high-potential or reportable incidents, and assists with the periodic review of this policy. Contact: Dennis.pollard@oakstonecontracting.com.

### Subcontractors & Suppliers

Comply with this policy and the Company's site rules while engaged on Company business, and hold suitable health and safety arrangements of their own or operate under this policy per MTM-POL-011 and MTM-FRM-001.

## 5. Related Documents

MTM-MAN-001 (IMS Manual, Section 9 — Health & Safety Management), MTM-REG-002 (Training Matrix), MTM-REG-006 (Equipment Register), MTM-REG-007 (Calibration Register), MTM-REG-008 (Legal Register), MTM-REG-010 (Risk Register), MTM-POL-005 (Speak Up/Whistleblowing Policy), MTM-POL-009 (Information Security Policy), MTM-POL-010 (Training & Competence Policy), MTM-POL-011 (Supplier & Subcontractor Approval Policy), MTM-POL-015 (Supplier Code of Conduct), MTM-PROC-002 (Internal Audit Procedure), MTM-PROC-003 (Management Review Procedure), MTM-PROC-004 (Corrective Action Procedure), MTM-PROC-008 (Training Procedure), MTM-PROC-010 (Non-Conformance Procedure), MTM-FRM-001 (Supplier Approval Form), MTM-FRM-006 (Toolbox Talk Record). Risk assessments (RAMS) are completed digitally in the ConeRQ app rather than on a Word/paper form — MTM-FRM-008 has been withdrawn accordingly.

## 6. Review

This policy is reviewed annually by Wayne Crawford, or sooner following a material change in legislation, accreditation requirements, or the Company's operations.