

## Group Policy - Health, Safety and Well-being

Approved by Board on 24 November 2022

### 1. Introduction and purpose

The Pebble Group plc (“**Group**”) is committed to protecting and effectively managing the health, safety, and well-being of its employees in all aspects of their work.

We recognise our responsibility and the importance of making sure that all of our Group operations have adequate health and safety provisions in place to provide a suitable working environment and to ensure that our employees, partners, customers or others who may be affected by the Group's operations, are not exposed to any unacceptable risks.

We also promote and support the well-being of all our employees, aiming to create an inclusive culture which focusses on prevention, and where issues are identified, minimised and managed before they have a detrimental impact on our employees' well-being.

### 2. Our Responsibilities – who must comply with this Policy?

The Group Chief Executive Officer (“**CEO**”) has primary responsibility for establishing and maintaining proportionate and effective health, safety and well-being policies and processes within the Group. Ultimately The Pebble Group Board of directors has overall responsibility for ensuring this Policy complies with our legal, regulatory and ethical obligations, and that all those under our control comply with it.

Then it is the responsibility of the Divisional Lead of each Group business and their leadership teams, to ensure the effective implementation and operation of the details outlined in this Policy by their respective businesses and for managing the Group's compliance with all health, safety and well-being requirements.

Management at all levels are responsible for supporting the effective management of health, safety, and the well-being of our employees in the workplace and ensuring those reporting to them understand and comply with this Policy and are given adequate training on it and any specific health, safety, and well-being aspects, as applicable to them in their role.

All directors, officers and employees at all levels, as well as other personnel who have the status of employees of the Group and its subsidiaries (collectively “**Group Employees**”) have to follow the requirements of this Policy (or their business' equivalent policy and procedures) so far as they are relevant to their role and their duties. This extends to all our business dealings and transactions in all countries in which we operate.

**In addition, we seek to work with business partners and others who share our values and standards and we expect them to behave consistently with the provisions in this Policy.**

This Policy is directly applicable to each Group business. It is the responsibility of each Divisional Lead to either incorporate it directly as one of their own working documents or ensure that their business has its own equivalent policy and procedures on health, safety, and well-being. Such policies and procedures must be adapted to the businesses' own needs and the requirements of applicable local laws and regulations. However, they must also be consistent with, and a more detailed continuation of, the principles and provisions of this Policy.

### 3. Questions on this Policy - who to go to for advice and guidance?

If you have questions or concerns regarding any aspect of this Policy or wish to seek guidance on its interpretation and application in a specific situation, you should raise and discuss this with your direct line manager, any member of the senior management team or your local HR department.

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## 4. How to raise concerns and seek guidance

If circumstances arise that give you reason to pause and consider whether a proposed course of action may contravene or contradict the principles contained in this Policy (involving other employees or any third party), it is your duty to speak up and you are encouraged to discuss it with your manager or a member of the senior management team or your HR Department.

Alternatively, you can report it through our Group Whistleblowing Portal:

<https://thepebblegroup.integrityline.com/>.

Employees will receive the Group's full support when raising any such concerns.

## 5. Policy Statement

We strive to ensure consistently high health and safety standards and to promote a culture of positive health and well-being for all of our employees, whilst ensuring compliance with all applicable laws and regulations.

### We will ensure that:

- Robust policies and procedures are in place across our Group to efficiently manage the health, safety, and well-being of all of our employees.
- Each of our Group operations:
  - implement this Policy or adopts their own policy (and any related policies or procedures) required at a local level, in line with Group requirements so that health and safety risks are understood and effectively managed;
  - allocate clear responsibilities and duties for health, safety and well-being within their business; and
  - effectively communicate with their employees to raise awareness and promote a culture of positive health and well-being.

## 6. Our Health, Safety and Well-being Commitments

- To conduct our activities in line with relevant health and safety legislation and standards.
- To prevent the risk of injury or poor health to our employees by creating and maintaining a safe environment through regular hazard identification, risk assessment and the implementation of controls to minimise risk levels.
- To provide instruction, training, supervision, and information as necessary to ensure that all employees can carry out their duties in a safe manner.
- To immediately investigate work related accidents or incidents that occur to identify the root cause and implement the necessary actions to prevent reoccurrence.
- To ensure that all employees undergo health and safety training relevant to their role in the business and are made aware of this health, safety, and well-being policy (or their business' equivalent policy and procedures) and how to access it.
- Aim to develop a culture that encourages employees to talk about well-being issues and promote healthy working practice, providing all employees with appropriate support and training to achieve their potential.
- Encourage our suppliers and business partners to implement best practice health and safety processes and procedures.

## 6. Communication and awareness of this Policy

The HR Department within each Group business will be responsible for ensuring the communication of this Policy (or their business' equivalent policy and procedures) and that training on health, safety, and well-being forms part of their employee training schedule, as applicable. Attendance at training is compulsory.

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## 7. Consequences of Policy violation

As the Group's businesses operate in many countries, each of which has its unique business, legal and regulatory environment, this Policy does not define a uniform set of sanctions for failure to comply with its requirements. Any violation or potential violation of this Policy will be handled by your local HR Department in accordance with the applicable policies governing employee relations and disciplinary measures.

However, any such case will be taken very seriously, and the Group will not hesitate to take appropriate disciplinary action (which could result in dismissal for gross misconduct) or report the incident to the relevant authorities, as appropriate.

## 8. Compliance monitoring, review, and continuous improvement

We will actively monitor our health and safety performance against the commitments set out in this policy and act where issues are identified, reporting on our results annually as a minimum.

Health and safety reports are provided to the Group Board for noting on a regular basis.

The applicable Divisional Lead or the CEO, as appropriate, will report any purported or potential breach of this Policy to the Group Executive Committee. The CEO will report all serious or continuous non-compliance with this Policy to the Group Audit Committee and/or ultimately the Group Board for awareness and monitoring on an ongoing basis.

The CEO in conjunction with the Group General Counsel and Company Secretary will be responsible for ensuring the suitability, adequacy, and effectiveness of this Policy and for making improvements, as appropriate. It will be reviewed and updated where necessary on at least an annual basis.

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