



Contractor Code of Conduct And Health and Safety Obligations

Introduction

You are engaged as a contractor by Lucy Group Ltd (trading as Lucy Properties) or Lucy Developments Ltd ("Lucy") due to your expertise in your field of work. We expect you to deliver your work to meet Lucy's quality standards and that of Lucy's tenants, purchasers or clients.

This Code outlines our expectations of all suppliers and contractors such as your business and defines the health and safety criteria for you or your contractors or employees working on a Lucy site or property. Lucy is required to provide a safe working environment for employees, visitors, contractors working on site and all other persons who may be affected by our work activities. Lucy has a duty of care to ensure that all contractors working on our premises carry out work in a safe and professional manner. Your employees and sub-contractors must be trained in the delivery of your services and hold the required competencies to use any specialist equipment or perform specific job functions. It is essential that you follow this Code.

We also require you to conduct yourself with the utmost integrity at all times, and take responsibility for any conduct which falls short. We require you to keep your personal interests separate from Lucy's interests. Decisions should be based solely on objective criteria, and we expect you to avoid conflicts or to ensure any conflicts are disclosed appropriately.

Site Conduct

- There is a NO SMOKING policy on all Lucy properties and sites to comply with legislation. Persons found in violation of this rule may be asked to leave the site.
- Use of facilities including toilets, kitchens etc. at Lucy's tenanted or managed properties is not permitted. You must agree with the relevant Lucy manager which facilities are available to you and your team.

Health & Safety Procedures, Policies and Documentation

- If you employ 5 or more people you are legally required to have a company health and safety policy. You must send us a copy of your policy to be held on file. Please send us a new copy when your policy is updated. Lucy's health and safety policy is available on request.
- You must ensure that your employees are made aware of Lucy's health and safety requirements, and any individual property constraints. These requirements should be identified at the risk assessment stage and included as applicable in your method statements.
- You must provide at all times a current public and employers liability insurance certificate and if applicable a current professional indemnity insurance certificate.
- If you as a contractor is not legally obliged to have a Health and Safety Policy you are still expected to have a Health and Safety Policy Statement (Part 1 of a Health and Safety Policy) and provide this to Lucy for approval.
- You must provide details of risk assessment procedures, contractor competence procedures and method statements before any work can be commissioned. Should you not have these in place, you may be required to complete specific risk assessment(s), in conjunction with Lucy, in advance of carrying out any work.
- Lucy operates a total ban of all hot works in relation to routine maintenance work undertaken on our property portfolio. This ban includes the use of heat or blow torches (soldering), heat guns (for burning off paint) and grinders and any other activity that requires high temperature treatment. This ban does not apply to refurbishment projects which are managed under CDM regulations.
- All hot work (refurbishment projects and other circumstances when agreed by Lucy that such hot works are unavoidable), working at heights, confined space work and lone working must be completed under permit to work conditions. These should be overseen and authorised by a Lucy property manager prior to commencement and on completion of work.

GDPR

- You are required to ensure that any data related to landlords, tenants and property/land owners is used only for the purpose of organising maintenance, repairs or any other works relating to the particular property.
- Tenants may only be contacted in relation to maintenance, repairs or other works, and for no other purpose.

- All data provided to you must be kept securely for the duration of the purpose it was required. Once the works have been completed, any works orders showing third party data must be kept securely. Any other information – telephone numbers, text messages or emails must be deleted permanently.
- No data collected may be passed on or sold without the express permission of the data subject.

Modern Slavery Act

You shall:

- Comply with all applicable laws, regulations, codes, guidance and sanctions relating to anti-slavery and human trafficking in the United Kingdom under the Modern Slavery Act 2015 (MSA) (the “Relevant Requirements”);
- Not engage in any activity, practice or conduct in any jurisdiction which would constitute an offence under the MSA;
- Have and maintain in place throughout the term of your contract with Lucy a policy with the aim of ensuring compliance with the Relevant Requirements and that slavery and human trafficking is not taking place in your business or any part of your supply chain (“Anti-Slavery Policy”), and shall ensure that such policy is provided to all relevant staff and enforced in an appropriate manner;
- Promptly notify Lucy if you have reason to believe that you or any member of your Supply Chain is in breach of the MSA, or if you receive a communication from any person alleging breach of the MSA in relation to the performance of your services or works for Lucy.

Anti-Bribery and Corruption

- Lucy has published a policy setting out the steps it expects suppliers and contractors to comply with a copy of which is available on request.
- It is Lucy’s policy to conduct our business in an honest and ethical manner. We take a zero-tolerance approach to bribery, money laundering and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery, money laundering and corruption.

Meeting Statutory Obligations & Lucy Guidelines

- Your operations must comply with all relevant statutory obligations, approved code(s) of practice, and with all Lucy’s procedures, guidelines and directions. The cost of meeting such requirements shall be deemed to be included in your contract price
- You shall adhere to this Code and any guidelines provided by Lucy, and provide additional information as required
- Lucy shall have the right to require you on receipt of our verbal instruction supported by notice in writing at a later date, to remove any of your employees who have failed to comply with any provision of the statutory regulations, approved code(s) of practice and Lucy’s policies and procedures

Lucy Group Ltd (Lucy Properties) and Lucy Developments Ltd – Contractor Code of Conduct

We have read and agree to the above conditions and, if applicable and provided to us, the terms set out in the Schedule attached as relevant to the scope of our services/works being performed by us for Lucy Group Ltd and/or Lucy Developments Ltd.

Company:

Name:

Position:

Signature:

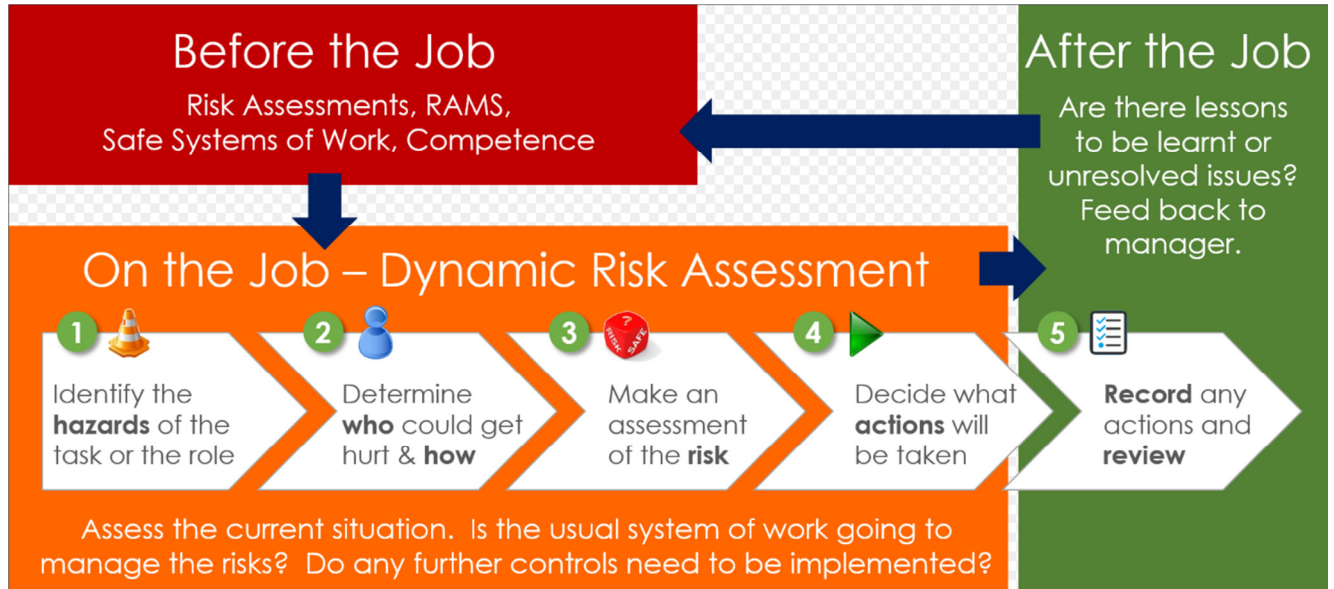
Date:

THE SCHEDULE

You must nominate a competent person, to have specific responsibility for all matters relating to on site health and safety. This person will liaise with the relevant Lucy manager, (the "Issuer") as necessary.

Dynamic Risk Assessment

Before completing a job, Lucy suggest completing a dynamic risk assessment using the methodology below or similar.



Any actions should be addressed by the person carrying out the work or the issuer before completing a further review to ensure all hazards have been addressed and appropriately managed.

CDM 2015 Construction (Design & Management) Regulations

The Construction (Design & Management) Regulations (CDM 2015) are the main set of regulations for managing the health, safety and welfare of persons involved in or affected by construction projects.

CDM applies to all building and construction work and includes new build, demolition, asbestos removal, refurbishment, extensions, conversions, repair and maintenance.

The contractor's duty is to:

- Plan, manage and monitor construction work under their control so that it is carried out without risks to health and safety.
- For projects involving more than one contractor, coordinate their activities with others in the project team – in particular, comply with directions given to them by the principal designer or principal contractor.
- For single contractor projects, prepare a construction phase plan.

A construction phase plan is required for every construction project.

Large projects – the construction phase plan must be prepared by the principal contractor/contractor in conjunction with the appointed CDM Advisor for the project.

Small projects including maintenance works, at the request of Lucy – the construction phase plan must be prepared by the contractor in conjunction with Lucy's project manager. Documents reference - CITB GA25 Pre-construction information, GA26 Construction phase plan.

Protective and Respiratory Equipment

- Protective clothing and equipment required under Statute Law and Approved Code(s) of Practice for the particular work being undertaken, e.g. safety footwear, safety helmets, ear defenders and eye protection, must be provided by you and worn or used by your employees/sub-contractors as determined under risk assessment/method statement/construction phase plan.
Safety shoes are a mandatory requirement on any Lucy site and you must ensure that all your employees and any subcontractors are wearing them at all times. Anyone found not wearing them may be asked to leave the site.

- Lucy reserves the right to specify additional or alternative protection to that normally used. Anyone refusing to accept these requirements will be asked to leave the site to ensure the safety of all other employees.

Record Keeping

- All records shall be kept in an easily retrievable management system as required by current legislation.
- All records pertaining to work undertaken on Lucy's behalf must be made available to Lucy upon request.
- You shall provide one copy of any drawings, manuals etc. as required for the files.

Accidents, work related diseases and Dangerous Occurrences

- Assessment of site conditions/notifications.
- All accidents must be reported to the Issuer (minor injuries to first aiders.)
- You are responsible for notifying the HSE of any injury, disease or dangerous occurrence on Lucy's property as per RIDDOR regulations.
- All reportable accidents or dangerous occurrences must be notified to the Issuer immediately.

Asbestos

Lucy takes the potential presence of Asbestos Containing Materials (ACMs) in its portfolio of properties very seriously and has a statutory and moral obligation to protect its employees, contractors and tenants from exposure to asbestos, as far as reasonably practicable.

As Contractor you are responsible for;

- Ensuring that any employees and sub-contractors under their management undertaking work on Lucy's portfolio have received asbestos awareness training.
- Ensuring that any employees and sub-contractors under your management undertaking work on Lucy's Real Estate portfolio have been made aware of the Site Rules and Guidance including the Asbestos Management Plan.
- Disseminating information on known ACMs to those undertaking the work.
- Not undertaking any work which may disturb known or suspected ACMs.
- Notifying Lucy immediately and stopping work if you encounter damaged or disturbed known or suspected ACMs.

Occupational Health & Hygiene

- You must ensure that all employees and sub-contractors are medically fit to carry out their duties on the site.
- Lucy reserves the right to remove from the site, any contractors' employees considered to be unfit for work.

Use of Lucy Equipment

- Equipment belonging to Lucy must not be used without Lucy's prior authorisation.
- Property or scrap belonging to Lucy must not be removed from site without proper written authorisation.
- Connections must not be made to the site services distribution systems, e.g. electricity or fire alarm without Lucy's written permission. This permission will be withheld if the equipment intended to be connected to such services does not conform to Statutory Regulations of Codes of Practice and/or Lucy's requirements.

Equipment Supplied by Contractor

- All tools and equipment must conform to and be tested in accordance with Statutory Regulations and/or Approved Code(s) of Practice. Lucy shall have the right to inspect and reject equipment considered unsuitable. Certificates of conformity for equipment must be produced on request.
- Where portable equipment and power tools are being used these should be battery operated, preferably or 110-volt type. Mains' voltage (240 volts) may only be used if 110 volt is not available and permission to do so is given by the issuer and then only when a residual circuit breaker is fitted. The Contractor shall provide the necessary safety transformers which must be 240/110V.
- The use of equipment which will expose either your employees or Lucy's tenants to noise levels in excess of 80 dB(A) must be agreed, with sufficient notice given to Lucy prior to your commencing work and you must take adequate protective measures.
- Adequate guarding, extraction, shielding etc., in accordance with Statutory Regs. and/or Approved Codes of Practice shall be provided. These may be inspected by Lucy at any time.
- Adequate protection of the fabric of the building, including floor finishes and tenants' belongings must be provided and correctly used. You are responsible for any associated cleaning work and may become liable for the additional cleaning charges if the property/site is not left as it is found

Materials to Be Used on Site

- Flammable liquids and liquefied petroleum gases must not be brought onto the site without the prior written permission of the Issuer. All such materials must be stored and used in accordance with current statutory obligations.
- A complete list of all hazardous substances (as defined by the COSHH Regulations and duly assessed), intended to be used on the site, with the quantities and hazards of each defined, must be supplied to Lucy's Construction Director or Project Manager on request. Lucy reserves the right to require additional protection at your own cost.
- At all times all materials, whether hazardous or not, must be stored correctly and labeled appropriately.

Disposal of Materials and Waste

- All materials brought on the site and subsequently residual to the work, remain your property (unless already paid for by Lucy) and must be disposed of by you, unless Lucy agrees in writing for you to use Lucy's disposal facilities.
- The disposal of all wastes and effluent generated by you is your responsibility to remove from the site in accordance with current legislation.
- For disposal of hazardous products, all disposal details, including authorised carrier, disposal site and method together with the relevant Transfer Note are to be supplied to Lucy for our records.