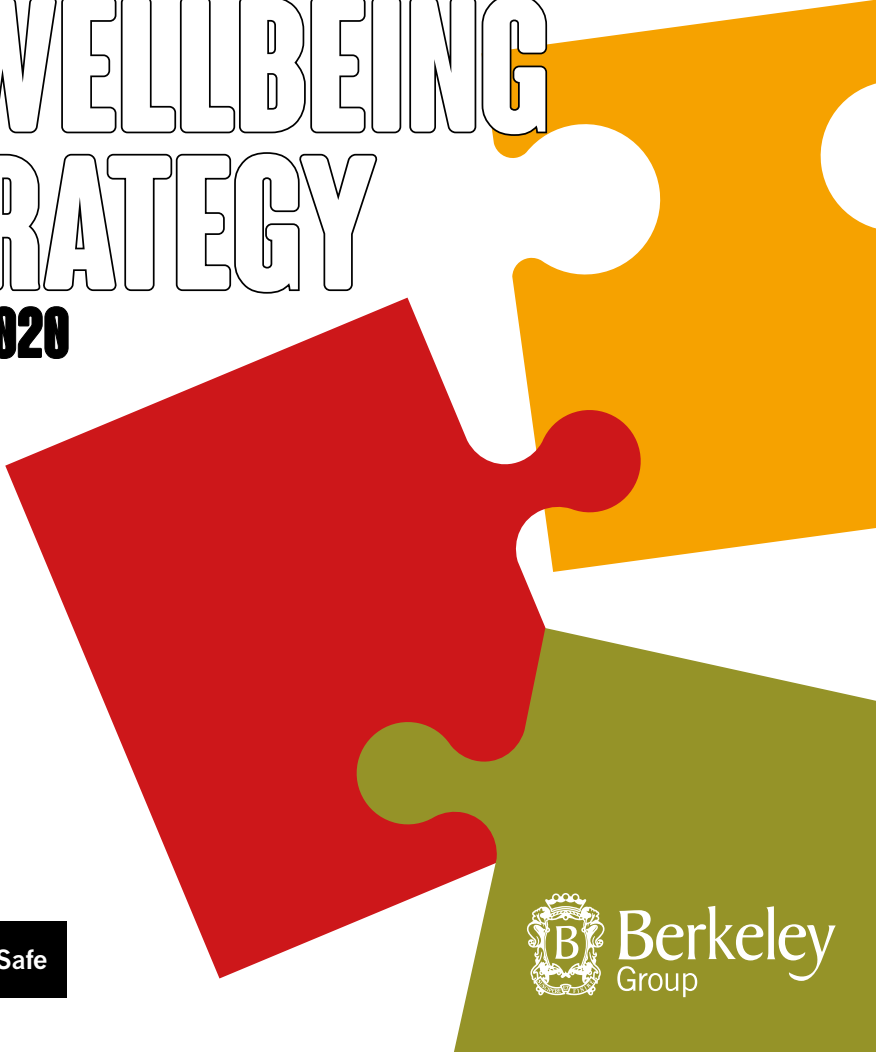


BERKELEY GROUP

HEALTH, SAFETY & WELLBEING STRATEGY

2018 - 2020



Proud to be Safe



Berkeley
Group

“THERE IS NOTHING MORE IMPORTANT TO THE BERKELEY GROUP THAN THE ELIMINATION OF ALL WORKER INJURY AND THE PROMOTION OF HEALTHY LIVING THROUGHOUT OUR ORGANISATION.”

Rob Perrins

Managing Director



INTRODUCTION

THE BERKELEY GROUP VISION IS TO BE A WORLD-CLASS BUSINESS.

This document sets out the Berkeley Group Holdings plc (Berkeley) strategy for Health, Safety & Wellbeing for 2018 to 2020.

Berkeley operates through an autonomous structure with strong leadership and direction from the Main Board. Our standards and procedures ensure a particular focus on high risk operations and there is a clear emphasis placed on continual improvement. In support of the commitment to Health, Safety & Wellbeing there is continuous measuring, monitoring and, where necessary, reviewing of the arrangements to ensure that the required Health, Safety & Wellbeing standards are met.

We recognise that strong leadership through the management structure is fundamental to delivering successful Health, Safety & Wellbeing management and industry-leading performance. Leadership, autonomy and ownership coupled with adequate finances and resources are key.

Health, Safety & Wellbeing are regarded as part of the brand with the best run sites as the brand ambassadors.

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OUR HEALTH, SAFETY & WELLBEING VISION

“BERKELEY IS COMMITTED TO OPERATING INCIDENT AND INJURY FREE AND ASPIRES TO HAVE A POSITIVE HEALTH IMPACT ON ALL THOSE EMPLOYED AND AFFECTED BY WHAT WE DO.”

Working with our supply chain we aim to achieve industry-leading performance, demonstrate clear and unequivocal leadership to others in the construction sector, and never knowingly compromise on Health, Safety & Wellbeing.

Ultimately we are proud to be safe, and we aim to demonstrate this through our own behaviour.

This vision is supported by clearly defined objectives and a supporting plan which establishes the basis on which we will successfully deliver business improvements.

Proud to be Safe

“THE BERKELEY GROUP NEVER KNOWINGLY COMPROMISES ON HEALTH, SAFETY & WELLBEING.”



“BERKELEY VALUES EVERYONE’S HEALTH AND WELLBEING, AND IS COMMITTED TO BEING AN INDUSTRY LEADER.”

OUR HEALTH, SAFETY & WELLBEING OBJECTIVES

IN SUPPORT OF OUR VISION OUR STRATEGIC OBJECTIVES ARE TO:

- 1. Continue to strengthen risk management in all areas**
- 2. Demonstrate enhanced commitment through leadership**
- 3. Raise standards and promote excellence**
- 4. Actively engage with our supply chain and workforce**
- 5. Drive cultural change through the business and influence industry**
- 6. Promote Health & Wellbeing arrangements**
- 7. Ensure clear and effective communication at every level across the business**
- 8. Demonstrate legal compliance**

These objectives are expanded upon later in this document.



DELIVERING OUR VISION & OBJECTIVES



This table sets out how we are specifically targeting improvement in support of our strategic objectives. These apply to all areas of the business.

STRATEGIC OBJECTIVE	EXPECTED OUTCOME / BENEFIT	IMPROVEMENT ACTION AREA
1. Continue to strengthen risk management in all areas	<ul style="list-style-type: none"> Reducing accidents and incidents Protecting reputation Reducing risk of non-compliance 	<ul style="list-style-type: none"> 1) Improve basic Health, Safety & Wellbeing training by setting and developing competency standards and guidelines 2) Increase Senior Managers' and Directors' understanding of risk management in key areas of Health, Safety & Wellbeing 3) Develop 'good practice' guidance and tools that can be used to improve hazard awareness and risk control 4) Monitor (audit) closely areas of high operational risk. Focus on these areas which could have a considerable impact upon the business
2. Demonstrate enhanced commitment through leadership	<ul style="list-style-type: none"> Directors and Senior Management involvement Positive Stakeholder appreciation 	<ul style="list-style-type: none"> 1) Promote strong leadership that is visible to all 2) Develop the competency of Health, Safety & Wellbeing leaders 3) Demonstrate that Senior Management at the highest level is accountable for the delivery of improved Health, Safety & Wellbeing performance
3. Raise standards and promote excellence	<ul style="list-style-type: none"> Demonstrating continual improvement to Stakeholders Providing information and data to inform decision making Enhancing reputation Enhancing ability to manage risk 	<ul style="list-style-type: none"> 1) Improve the use of available Health, Safety & Wellbeing information and data to inform decision making 2) Promote the raising of standards in areas of Health, Safety & Wellbeing Management that will provide a sustainable improvement in Health, Safety & Wellbeing performance 3) Use external sources to provide information and opportunities to improve risk management
4. Actively engage with our supply chain and workforce	<ul style="list-style-type: none"> Contributing to the effective management of Health & Safety Workforce proud of their place of work and maintaining high standards Enhancing safety culture through active engagement 	<ul style="list-style-type: none"> 1) Continue to support Health, Safety & Wellbeing innovation through the Innovation Fund 2) Promote active workforce engagement in the management of risk 3) Identify and remove barriers to workforce engagement 4) Identify and share examples of workforce 'good practice'

STRATEGIC OBJECTIVE	EXPECTED OUTCOME / BENEFIT	IMPROVEMENT ACTION AREA
5. Drive cultural change through the business and influence the industry	<ul style="list-style-type: none"> Enhancing reputation as a business and as an employer Reducing 'human error' incidents 	<ul style="list-style-type: none"> 1) Further develop arrangements for Cultural Change 2) Monitor and review unsafe acts/conditions
6. Promote health and wellbeing arrangements	<p>Improve health by focus on:</p> <ul style="list-style-type: none"> Occupational health Health and wellbeing Mental Health 	<ul style="list-style-type: none"> 1) Commit to improving health and wellbeing in all areas and making the link between physical and mental health
7. Ensure clear and effective communication at every level across the business	<ul style="list-style-type: none"> Demonstrating a consistent and timely message with regards to Health, Safety & Wellbeing Sharing of information across the business Keeping Stakeholders informed 	<ul style="list-style-type: none"> 1) Communicate Health, Safety & Wellbeing matters in a suitable and timely manner across all areas of the business 2) Identify good and poor practices and share information 3) Actively seek the views of Stakeholders and account for these views in decision making 4) Identify opportunities and implement solutions to improve communications
8. Demonstrate legal compliance	<ul style="list-style-type: none"> Proactive approach demonstrating compliance Exceeding minimum legal requirements Protecting reputation Minimising exposure to enforcement action 	<ul style="list-style-type: none"> 1) Ensure communication and implementation of any new or changes to existing legislation 2) Enhance Management and Operational Standards to show minimum requirements 3) Ensure a programme of inspections is maintained and carried out 4) Develop a programme of internal audits to monitor compliance to Standards

CORE PROGRAMMES IN SUPPORT OF OUR VISION & OBJECTIVES

Berkeley has three core corporate programmes which are designed to provide a platform for actively delivering Health, Safety & Wellbeing improvements in all our operations, a summary of their purpose is set out below:



GOOD ORDER

To raise standards of the physical working environment to the highest possible, thus reducing the potential for injury



GOOD WORK

To promote a positive culture and develop attitudes and behaviour. To focus on hazards and risks, work planning and delivery through effective management and supervision, thus reducing the potential for injury



GOOD HEALTH

To improve Health and Wellbeing awareness and promote enhanced arrangements to create conditions which have a positive impact on Health and Wellbeing in the working environment

The principles of these programmes are applied Group wide to all our operations, and delivered through local arrangements within each business.



WELCOME
YOU ARE NOW ENTERING A BERKELEY SITE

SAFETY STARTS HERE
NO SAFETY HELMET AND FOOTWEAR
NO WORK!

DANGER
CONSTRUCTION INDUSTRY AREA

- No unauthorised admittance
- Foot protection must be worn
- Hi-Vis clothing must be worn
- Head protection must be worn
- No movement permits beyond Red zone

5 SITE SPEED LIMIT 5

All visitors and delivery drivers must report to Gate Man or Site office

!

All sub-contractors must sign in

CONTACT

CONSIDERATE CONSTRUCTORS

This project is registered with The Considerate Constructors Scheme (see website for details)

0800 783 1423
www.ccscheme.org.uk

SITE ENTRANCE
HAVE YOU BEEN INDUCTED?
HAVE YOU SIGNED IN?
CORRECT P.P.E.?
PLEASE KEEP TO WALKWAYS
(SEE TRAFFIC MANAGEMENT IN INDUCTION ROOM)

Berkeley
Designed for life

“CREATING SAFE AND TIDY WORKPLACES IS A PRIORITY FOR BERKELEY.”



IF YOU SEE IT, SORT IT, REPORT IT

Launched in 2007 the 'Good Order' programme targets the physical working environment, and in particular the infrastructure that supports day-to-day operations. We aim to go beyond legal compliance and achieve the highest standards. In doing so we create a working environment which has reduced risk, allows for efficient production and is appreciated by our workforce.

The main principles of 'Good Order' are:

- **High levels of focus on site set up and provision of site-wide infrastructure (e.g. welfare, walkways, storage, etc)**
- **Active monitoring of site conditions and prompt response to closing out sub standard situations**
- **Active reporting of unsafe conditions, near miss incidents and applying / sharing the learning**
- **Active engagement with the workforce and response to observations made**
- **Clear demonstrable leadership from Berkeley and supply chain management and supervision**

'Good Work' was updated in 2014 and will continue to evolve and become more ambitious over time.



Good Order was launched to help eradicate trips and hazards on site

**“BEFORE WE START ANY
JOB WE MAKE SURE IT
IS PLANNED CORRECTLY.”**



BEFORE YOU START, PLAN IT, THINK IT, DO IT

Following the success of ‘Good Order’, the ‘Good Work’ programme was launched in 2009. Its purpose is to provide a high degree of focus on risk management and encourage positive behaviour and attitudes on our sites through strong leadership and workforce engagement. Ultimately it’s about people!

The main principles of ‘Good Work’ are:

- **Early engagement with the supply chain**
- **High levels of focus on work planning and risk mitigation prior to work commencing**
- **Active engagement and clear communication of working methods to the workforce (e.g. daily task briefings)**
- **Promotion of positive behaviour / attitudes and to take responsibility**
- **Effective application of training and competence**
- **Active monitoring of working methods / site operations and prompt response to closing out sub-standard situations**
- **Clear demonstrable leadership from Berkeley and supply chain management and supervision**

‘Good Work’ was updated in 2014 and will continue to evolve and become more ambitious over time.



Good Work has helped promote proper planning and thinking

“THE GOOD HEALTH INITIATIVE IS AIMING TO IMPROVE THE HEALTH AND WELLBEING OF EVERYONE.”



EVERY DAY, EAT WELL,
WORK WELL, LIVE WELL

Launched in 2014 the 'Good Health' programme builds on the success of 'Good Work' and 'Good Order' and will target improvements in respect of arrangements and awareness in the area of Health and Wellbeing. It is acknowledged that there is a lot of work to be done in this area across the industry generally and Berkeley is looking to take a lead with this programme.

The main principles of 'Good Health' are:

- **The development and implementation of an industry-leading strategy for Health and Wellbeing**
- **Active promotion of Health and Wellbeing awareness at work**
- **To provide Health and Wellbeing arrangements for both Berkeley and our supply chain**
- **To improve the understanding of mental health within the Berkeley Group and address the stigma associated with it**

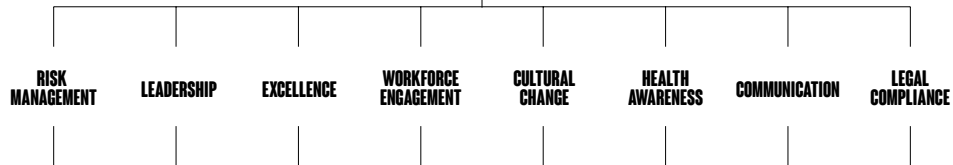


Good Health aims to improve not just the physical health but also the mental health of our employees

OUR HEALTH, SAFETY & WELLBEING MODEL

Proud to be Safe

STRATEGIC OBJECTIVES



CORE PROGRAMMES



MENTAL HEALTH

Mental ill health covers a variety of different conditions, ranging from depression, anxiety and stress related disorders to schizophrenia and personality disorder. In the workplace the primary manifestations of mental ill health are anxiety, stress and depression which, although they may not be caused directly by work, are frequently exacerbated by it.

Poor mental health can affect anyone, yet, with effective promotion, prevention and early intervention, its impact can be reduced. Furthermore, the interaction between work and mental health is complex and sensitive.

This is particularly relevant in the construction industry where the challenge is even greater.

Statistics for the construction industry:

- One in four people will experience mental ill health in any given year
- Suicide rates in the industry are four times greater than the national average
- Stress is commonplace

MIND MATTERS SURVEY - KEY FINDINGS

1 IN 4

OF RESPONDENTS HAVE
CONSIDERED TAKING
THEIR OWN LIFE



55%

OF RESPONDENTS HAVE
EXPERIENCED MENTAL HEALTH
ISSUES IN THEIR LIVES



88%

SAID THERE NEEDS TO BE MORE
SUPPORT FOR THOSE THAT SUFFER
MENTAL HEALTH ISSUES

BERKLEY GROUP'S VISION:


“TO CREATE A WORKPLACE WHERE MENTAL ILL HEALTH IS UNDERSTOOD, EFFECTIVELY TREATED, AND ULTIMATELY PREVENTED”.

As part of 'Our Vision' for 2018-2020 there is a leading commitment to write a strategy for addressing mental ill health across the Berkeley Group.

STRATEGIC OBJECTIVES:

-  1. Produce implement and communicate a mental health at work plan
-  2. Develop mental health awareness among employees
-  3. Encourage open conversations about mental health and the support available when people are struggling
-  4. Provide employees with good working conditions
-  5. Promote effective people management
-  6. Routinely monitor employee health and wellbeing

ENHANCED OBJECTIVES:

-  1. Increase transparency and accountability through internal and external reporting
-  2. Demonstrate accountability
-  3. Improve the disclosure process
-  4. Ensure provision of tailored in-house mental health support and signposting to clinical help.

(Objective and Enhanced Objectives based on those contained within the 'Thriving at Work' report commissioned by the Government and produced by Dennis Stevenson and Paul Farmer in October 2017).

Action Plan:

A high level action plan has been developed to support these objectives.

Resources:

There is also a resources roadmap which is based around the 'Building Mental Health' initiative which provides a framework, charter and online portal to tackle the mental health crisis in construction. These can be found at www.buildingmentalhealth.net. (Building Mental Health is a group formed of volunteers from the construction industry who pull together thinking and information around mental health for the construction industry).



Health within the Berkeley Group can be split into three important areas these are:

- Occupational Health – activities on site such as dust, noise, musculoskeletal disorders (msd's) etc.
- Health and Wellbeing – medical assessments, Employee Assistance Programmes and wellbeing initiatives etc.
- Mental Health – defined as 'a person's condition with regard to their psychological and emotional well-being' and is about awareness and recognising signs and signposting people who need help from professionals.

 OCCUPATIONAL HEALTH	 HEALTH & WELLBEING	 MENTAL HEALTH
Managing Site Activities	Medicals / Health Assessments	MH Awareness (45 minutes)
Noise / Dust / MSD's	Healthy Minds EAP	Line management Responsibility (Half day course)
Asbestos / Lead	Wellbeing initiatives Fruit, funding for sport activities, lunch & learn sessions	Mental Health First Aider (Two day course) Signposting professional help



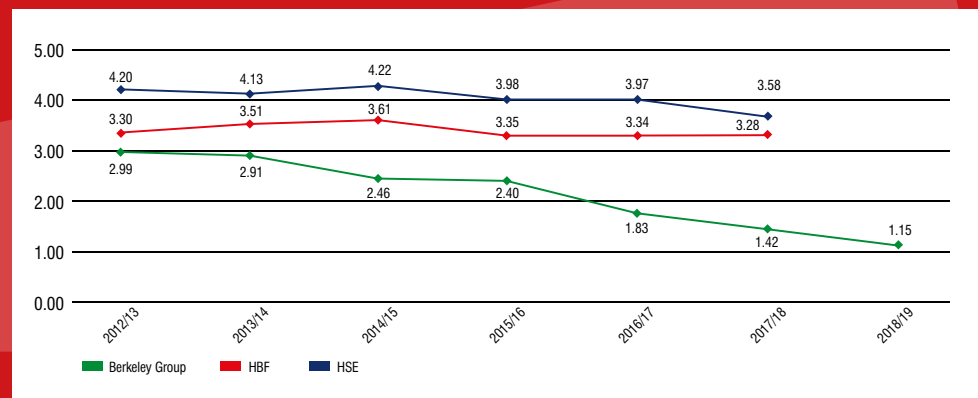
IMPROVE

- Reduction in Absenteeism/Presenteeism
- Increase in Staff Retention
- Moral and Motivation
- Employee Engagement
- Commitment / Productivity / Satisfaction



MEASURING SUCCESS AND PERFORMANCE

We have defined a number of measures which will help us determine our progress. These Key Performance Indicators (KPIs) are a combination of 'Leading' (proactive) and 'Lagging' (reactive) and will be subject to review on an ongoing basis. These KPI's will help us to 'benchmark' ourselves internally and externally.



Consolidated Berkeley Group Accident Incident Rate (AIR) from 2012/13 to 2018/19 compared with Health & Safety Executive (HSE) and House Builders Federation (HBF) rates.

(Source: HSE and HBF)



KEY PERFORMANCE INDICATORS (KPIs)

LEADING INDICATORS

1. Directors to undertake weekly internal Health & Safety visits to all live projects under construction
2. Report and investigate 'Non injury' incidents and where relevant, share the lessons learned Group-wide to prevent re-occurrence
3. All live projects under construction to be assessed by the independent Group Health & Safety Assessment Team every 6 weeks
4. Report all interventions classified as 'Unsafe Acts' or 'Unsafe Conditions'
5. Develop a personal training plan for all staff within one month of starting work
6. Report on training delivered against plan
7. Report on completed health assessments (%)
8. All live construction sites to be registered with Considerate Constructors Scheme (CCS) and achieve a minimum score of 38 in every site audit
9. Achieve a Group consolidated score of at least 40 within the Considerate Constructors Scheme

LAGGING INDICATORS

10. Report and investigate any 'Dangerous Occurrences'
11. Report and investigate any incidents involving members of the public
12. Report and investigate any Enforcement Agency intervention
13. Analyse health and wellbeing results through BUPA portal
14. Achieve a RIDDOR reportable Accident Incident Rate (AIR) of less than 2.75 per 1,000 employees
15. Achieve a RIDDOR reportable Accident Frequency Rate (AFR) of less than 0.13 incidents per 100,000 hours worked

IN THE LAST 2 YEARS BERKELEY HAS RECEIVED:



1
SIR GEORGE EARLE
TROPHY

2
SECTOR
AWARD

2
SECTOR AWARD
RUNNER UP

15
GOLD
MEDALS

20
GOLD ACHIEVEMENT
AWARDS

5
SILVER ACHIEVEMENT
AWARDS

1
MOST CONSIDERATE SITE

3
MOST CONSIDERATE SITE
RUNNER UP

17
GOLD
AWARDS

19
SILVER
AWARDS

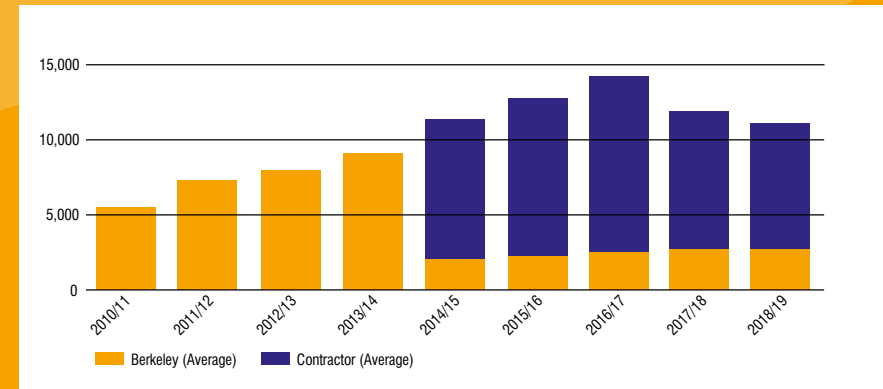
23
BRONZE
AWARDS

OUR PERFORMANCE

1.15
INCIDENT RATE
FOR 2018/19

The growth of the business in the last few years has seen changes and challenges in respect of the management of Health, Safety and Wellbeing. The headcount peaked at 15000 in 2016/17.

Headcount – 2010/11 to 2018/19



With the pace of change, maintaining standards against growth has been given additional focus. The Berkeley management teams have a natural drive to be the very best at what we do, and this lies at the heart of the business. In keeping with our world class aspirations, the standards in all that we do, and in particular Health, Safety and Wellbeing must be maintained at a high level.

In the last ten years there has been a year on year reduction in the Accident Incident Rate (AIR) and Accident Frequency Rate (AFR) and this is reflected in the chart on Page 22. The AIR at April 2019 was 1.15 compared to an industry average of 3.58 (Source: HSE - October 2018).

The improvement has been achieved through a number of means, most importantly on focus on leadership and risk management of high risk activities, with sufficient management of lower risk operations to provide assurance in these areas to ensure work is being carried out to a high standard.

Using our Good Work, Good Order and Good Health programmes many initiatives have been introduced at divisional and site level to ensure that the Berkeley Group vision is being carried through.



PROUD TO BE SAFE

We recognise at Berkeley, that as the client we have a responsibility to show clear leadership. We consider the absolute cornerstone of leadership is the true belief in what you say and do, and are very proud to say that Health, Safety and Wellbeing is at the very heart of all that we do.

We have been working closely with Jason Anker on our behavioural programme and have adopted the 'Proud to be Safe' emblem which we believe strongly represents our approach.

Jason Anker is the UK's leading speaker on Behavioural Safety Training and has been working with the Berkeley Group for over 8 years. Having been in a major accident many years ago on a building site, Jason speaks on the emotional perspective of why Health, Safety and Wellbeing is not just about ticking boxes.

His audience walk away from his talk engaged with the process of Health, Safety and Wellbeing because they have witnessed first hand the effect of getting it wrong. Through the benefit of not just telling staff and contractors what to do, but showing them what the personal effect could be by ignoring Health, Safety and Wellbeing guidelines people leave his talks with the empowerment to feel the responsibility for both their own safety and that of their co-workers.

Proud to be Safe



“BERKELEY IS PASSIONATELY COMMITTED TO THE PEOPLE WORKING IN OR TOUCHED BY OUR BUSINESS. IN HEALTH, SAFETY AND WELLBEING WE ARE ALL EQUAL AND WE CARE ABOUT THE IMPACT OF WHAT WE DO ON EVERYONE.”

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