

# External Supplier Control Obligations

## Health and Safety

Barclays recognises that we have clear Health and Safety (H&S) responsibilities towards everyone impacted by our business operations including, amongst others, employees, contractors, customers, visitors and members of the public.

Barclays is committed to ensuring the H&S of our employees, providing and maintaining a safe working environment to prevent occupational injury, ill-health and promoting mental wellbeing. Barclays regards local legislative compliance as an absolute requirement but where practicable, will also seek to implement minimum standards with a focus on continually reviewing and, where necessary, further reducing any significant H&S risks.

All activities undertaken on behalf of Barclays must also be compliant with all H&S legislations and/or regulatory requirements within the respective jurisdictions. The intent of the organisation is set out in the 'Barclays H&S Policy Statement of Commitment' endorsed by the Group CEO. Barclays has defined control objectives to address H&S risks in addition to the mandatory minimum standards which have been established for those who are responsible in the management of H&S. Barclays H&S Policy and Standard are aligned to the requirements of an internationally recognised H&S management system to ensure that Barclays:

- Implements a structured H&S management framework, which defines Barclays minimum Group H&S standards, to support the safe delivery of Barclays services
- Demonstrates personal leadership in safety matters and ensure that colleagues at all levels take responsibility for H&S as part of their day-to-day role
- Provides competent advice and appropriate resources to support the management of H&S
- Consults with employees on matters affecting their H&S and encourage their involvement in managing risks with their activities
- As a minimum, is compliant with all legislative requirements and where practicable, to seek to promote higher standards of health and safety
- Proactively identifies H&S hazards and introduce appropriate controls to reduce risks relating to our operations
- Ensures that adequate H&S information, instruction, training and supervision are provided to all colleagues, relevant to their roles and responsibilities
- Monitors H&S performance and undertake regular reviews of our H&S framework, using the results to drive continual improvement in our performance
- Promotes the physical and mental well-being of our employees

Control Title	Control Description	Why this is important
1. H&S Management	<p>Suppliers have a defined H&amp;S management system to control H&amp;S risks associated with their activities and Suppliers MUST undertake H&amp;S pre-qualification via Barclays' chosen third party supplier evaluation scheme (SEDEX)*</p> <ul style="list-style-type: none"> <li>- Suppliers must achieve a 'LOW' Health and Safety Risk Rating in SEDEX within six months of joining the scheme</li> <li>- Suppliers must agree an action plan with the Supplier Manager if they are rated as 'MEDIUM' risk in SEDEX from the prequalification process to achieve a 'LOW' rating within six months of joining the scheme</li> <li>- Suppliers must undergo a H&amp;S audit (SMETA) if they are rated as 'HIGH' risk in SEDEX from the prequalification process and complete all actions arising within the arranged timeframe provided from the audit</li> <li>- Suppliers must retain membership and maintain a 'LOW' risk rating throughout the life of the contract</li> <li>- A completed SEDEX report, including the Health and Safety Risk Rating must be provided to Barclays BEFORE the contract can be signed</li> </ul> <p>*UK Only: Suppliers may also demonstrate competence through continued membership of a registered Safety Scheme in Procurement (SSIP) recognised scheme as long as the suppliers name and correct address appear in the SSIP portal. No risk rating is generated and competence is fully recognised where suppliers are confirmed to have a valid SSIP portal entity.</p>	<p>Barclays has a duty to ensure that they only engage competent suppliers with effective H&amp;S management systems to ensure suppliers do not harm Barclays' employees or customers in the course of their activities.</p> <p>In order to demonstrate suitable H&amp;S arrangements, Suppliers are required to demonstrate that their H&amp;S programmes meet the expectations set out by Barclays H&amp;S department.</p> <p>For further detail. Please see SSIP link: <a href="http://SSIP.org.uk/members/">http://SSIP.org.uk/members/</a></p>

2. H&S Competence	<p>Suppliers must have access to competent H&amp;S advice and support for the jurisdictions in which they operate.</p> <p>Suppliers must identify a competent person who will be responsible for the safety of their activities (including subcontractors) and to act as the contractors' (and the subcontracting company's) representative on site.</p> <p>Self-employed individuals may nominate themselves.</p>	<p>Suppliers need to have access to competent health and safety advice to support them in meeting their H&amp;S duties.</p> <p>A competent person is someone with the necessary skills, knowledge, and experience and, where required, legally recognised qualifications to manage H&amp;S.</p> <p>To ensure that works are being completed, as a minimum, in line with Barclays' H&amp;S expectations, relevant supervisor must take responsibility for all staff on site and act as an oversight for the contractors' (and the sub-contractors') activities.</p>
3. Training	<p>Suppliers must ensure that their personnel are suitably competent prior to conducting any work related activities on a Barclays site.</p> <p>Suppliers must be able to demonstrate that their employees have received adequate instructions for all jobs with regards to H&amp;S and be provided with the correct equipment and training to carry out the work safely.</p>	<p>Suppliers are required to provide H&amp;S information and training to their employees and sub-contractors to:</p> <ul style="list-style-type: none"> <li>• ensure that all staff know how to work safely and without risks to health;</li> <li>• develop a positive H&amp;S culture, where working safely and healthily becomes second nature to everyone; and</li> <li>• meet the legal duty to protect employees' H&amp;S.</li> </ul>
4. Legal Compliance	<p>Suppliers must ensure that they have adequate processes to identify all applicable H&amp;S legislations in the jurisdictions in which they provide services to Barclays.</p> <p>Suppliers must comply with all applicable H&amp;S legislations in their local jurisdiction and have an adequate process to review compliance against local H&amp;S legal requirements.</p>	<p>Barclays is committed to ensuring that all operational activities meet legal requirements in the jurisdiction in which it operates.</p> <p>To prevent prosecution, Suppliers must have competent knowledge with regards to any applicable regulations in the jurisdiction in which it operates, and to ensure that they have adequate process in place to achieve such legal compliance.</p>
5. Operational Delivery Controls	<p>Suppliers must identify and operate in compliance with other H&amp;S requirements such as Barclays internal standards, appropriate industry standards and local best practice.</p>	<p>Barclays Minimum Health and Safety Operational Delivery Requirements Manual have been set to ensure that there is a minimum standard of H&amp;S control measures to prevent harm to people regardless of local legislation or in the absence of legislation</p> <p>Suppliers should ensure that they comply with legal requirements where they exceed Barclays' minimum requirements, and always aspire to exceed minimum requirements.</p>

<p>6. Safe Systems of Work</p>	<p>Suppliers and their subcontractors must ensure that all activities that they undertake are supported by a task specific risk assessment and method statement.</p> <p>Task specific risk assessment must (i) identify any hazards and risks associated with such task, (ii) identify the environment where such task is being completed and (iii) establish safety control measures to eliminate or mitigate risks from those hazards.</p> <p>A method statement is a record of how the task will be completed in a safe manner and should include the controls measures relating to the works as detailed in the risk assessment. Method Statement, as a minimum, must contain:</p> <ul style="list-style-type: none"> <li>• A step by step outline of how the job will be undertaken</li> <li>• Details of any resources (tools, fire extinguishers etc.) and/or manpower required</li> <li>• Expected duration of works, persons responsible on site and contact details</li> <li>• Any isolations required (electrics, smoke heads, alarms etc.)</li> <li>• Specific Personal Protective Equipment (P.P.E) required</li> <li>• Any permits required</li> <li>• Waste disposal considerations</li> <li>• Emergency arrangements</li> </ul>	<p>A safe system of work should be in place as this is a process that results from a systematic examination of activities, which identifies hazards and specifies working methods in order to prevent harm to people and ensure a consistent approach to managing H&amp;S.</p> <p>Before a task commences, operations must be familiar with the associated risk assessment, method statement and required control measures.</p> <p>Although task specific risk assessments and method statements may be generic for repeated tasks, the location and the environment in which the task is to be completed in, should be considered before the task begins.</p>
<p>7. Sub-contractor Control</p>	<p>Suppliers are responsible for ensuring that any subcontractor they appoint is competent to carry out the work and has formal arrangements for the management of H&amp;S. Suppliers must undertake a formal pre-qualification vetting process to determine that the subcontractors they use have appropriate H&amp;S arrangements in place.</p> <p>Suppliers are also responsible for monitoring the on-going H&amp;S performance of subcontractors they employ and should ensure that they retain suitable documentary evidence of performance.</p> <p>*Note: If supplier is using a Tier 1 principle subcontractor(s), which means that the subcontractor is completing ALL the activities on the supplier's behalf, then:</p> <ul style="list-style-type: none"> <li>- H&amp;S and other applicable SCOs should be performed for this subcontractor</li> </ul>	<p>Where the Principal Contractor needs to use a sub-contractor as part of their provision of services to Barclays, the Principal Contractor has a duty to Barclays to ensure that the sub-contract has sufficient skills, knowledge and suitable H&amp;S arrangements (which meet Barclays expectations) to do the job safely and without creating risks to H&amp;S.</p>
<p>8. Inspections</p>	<p>For activities carried out on Barclays premises regular H&amp;S inspections of the Supplier's work areas/activities should be undertaken to review working practices, materials and quality of workmanship and all inspections should be recorded and documented. It should also demonstrate that any identified improvement opportunities have been suitably addressed; the records must be made available to Barclays.</p>	<p>To ensure the continued compliance with legal and Barclays' requirements, it is important that there is a level of assurance by Suppliers that they are observing their activities.</p> <p>Barclays will have further oversight of Supplier activities to ensure that inspection reports are accurate.</p>

<p>9. Accident reporting</p>	<p>All accidents, incidents, near misses and 'good catches' occurring on Barclays premises or involving Barclays staff must be reported to Barclays in order for the detail to be captured in the Barclays Health and Safety Accident reporting system.</p> <p>In particular:</p> <ul style="list-style-type: none"> <li>• Fatalities, Critical Injuries and Lost Time Injuries should be reported immediately by the fastest means possible; and</li> <li>• Medical Treatment Cases, First Aid cases and Near Misses should be reported within 24 hours of the incident</li> </ul> <p>It is the responsibility of the Supplier to investigate all accidents relating to only their staff, subcontractors and others (i.e. Non-Barclays staff) on a non-Barclays premises. Any harm or incidents occurring on Barclays premises or involving Barclays staff as a result of a supplier's activities and/or omission of then suppliers MUST engage with Barclays immediately</p> <p>*Where a Supplier's employee has had an accident that is reportable to the local enforcement authority, it is the responsibility of the Supplier to report such incident to the local enforcement authority for accidents that occur on a Barclays premises. Confirmation of reports must be forwarded to the Barclays H&amp;S.</p>	<p>Barclays has a duty of care to all those impacted by our operations and must be informed of all accidents that occur in relation to our operations.</p> <p>By identifying accidents and effectively investigating them, Barclays is able to identify actions to prevent reoccurrence of the same type of accident.</p> <p>Following an accident, a Supplier must submit the following accident reports to Barclays:</p> <ul style="list-style-type: none"> <li>• Initial written report with basic details within 24 hrs of the incident</li> <li>• Interim report within five working days of the initial report</li> <li>• Final report within 10 working days of the incident. (including any further actions required to resolve the incident or complete the investigation)</li> </ul>
<p>10. Reporting</p>	<p>Suppliers are required to track and monitor their H&amp;S performance through performance indicators.</p> <p>Supplier must define (non-exhaustive list):</p> <ul style="list-style-type: none"> <li>- Leading Indicators (e.g. completion of statutory Planned Preventative Maintenance (PPM) schedules, inspections, risk assessments, surveys, training, completion of corrective actions etc.)</li> <li>- Lagging indicators (e.g. ill health, accidents (including accidents, near-misses, etc.</li> </ul> <p>All indicators must be analysed for trends and to identify areas for continual improvement. Summary of performance data must be reported to Barclays H&amp;S on a minimum quarterly basis.</p>	<p>The effectiveness of H&amp;S controls and overall H&amp;S Management System performance is measured and monitored through Risk Indicators and agreed Management &amp; Business Information (MI/BI) reporting and monitoring criteria, for health as well as for safety.</p> <p>By measuring H&amp;S performance, Barclays is able to ensure that we identify areas for improvement and continually aspire to reduce the risk of harm to people.</p>