

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
H&S Management	<p>1. Suppliers must have a defined H&S management system to control H&S risks associated with their activities and are required to completed the following BEFORE contract completion (for new suppliers) or BEFORE activity commencement (for existing suppliers when a change in activities is planned); suppliers must comply with one of the following:</p> <p>1.a) hold certification to ISO 45001/OHSAS18001 and submit their certificate showing scope that includes the services/activity being supplied to Barclays (certificates must be uploaded into the Barclays procurement system by the Barclays Sourcing/Supplier Manager (SM) following validation by the H&S SME), or</p> <p>1.b) demonstrate SSIP membership (Please note that SSIP is recognised within the UK ONLY) (evidence of SSIP membership must be uploaded into the procurement system following validation by the H&S SME), or</p> <p>1.c) undertake a H&S pre-qualification process via the Barclays supplier evaluation scheme (SEDEX).</p> <p>1.d) Where a supplier relies upon a valid certificate complying with 1.a) above, the supplier must maintain the validity and scope of certification. The Supplier Manager is responsible for monitoring certification validity and therefore must ensure continuity of validity. Where continuity of validity is not maintained, a Breach must be raised in ORAC.</p> <p>2. Where option 1.b) is selected, suppliers must achieve a 'LOW' Health and Safety Risk Rating in SEDEX within 5 months of the Barclays Supplier Risk Evaluation (SRE) having identified that H&S SCO is applicable.; note: there is a low nominal administration fee charged for this external service. The requirements for completing SEDEX are:</p> <p>2.a) Suppliers must immediately create a SEDEX membership for each country that they will delivering services to Barclays,</p> <p>2.b) create a relationship within SEDEX to Barclays and complete both the SEDEX SAQ and Barclays SAQ;</p> <p>2.c) Action must be completed relating to the risk rating identified by SEDEX: I LOW risk rating achieved via SEDEX: supplier must maintain a LOW risk rating for the term of their contract with Barclays. I MEDIUM risk rating achieved in SEDEX: the Barclays Supplier Manager must agree an action plan with the supplier to achieve a 'LOW' rating within 5 months of SRE; the plan must be approved by the Barclays H&S SME. I HIGH risk rating achieved in SEDEX: the supplier must undergo an on-site H&S SMETA audit at the suppliers cost. Suppliers are required complete all actions arising from the SMETA Audit</p> <p>2.d) Suppliers must retain an active SEDEX membership and maintain a 'LOW' risk rating whilst H&S SCO is applicable and throughout the life of the contract.</p>	<p>Barclays has a duty to ensure that they only engage competent suppliers with effective H&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&S arrangements, Suppliers are required to demonstrate that their H&S programmes meet the expectations set out by Barclays H&S department by meeting at least one of the 3 core Barclays recognised safety schemes</p> <ul style="list-style-type: none"> (1) ISO45001 / OHSAS18001 (2) SSIP (Safety Scheme in Procurement) For further detail. Please see SSIP link: http://SSIP.org.uk/members/ (3) SEDEX

	<p>2.e) Suppliers must conduct an annual review via SEDEX and update any changes that are applicable.</p> <p>3. Suppliers that conduct construction activities for Barclays must agree to comply with the Barclays Construction H&S Inspection process, which is undertaken on-site by the Barclays H&S Service. Actions identified to remedy compliance with the Barclays Construction H&S Group Minimum Requirements (see HSE-5) arising from these inspections must be completed within the assigned timeframes. Inspections are scheduled according to risk, not all activity is subjected to inspection.</p> <p>4. <i>Definition: “construction work” means the carrying out of any building, civil engineering or engineering construction work and includes:</i></p> <p>4.a) <i>the construction, alteration, conversion, fitting out, commissioning, renovation, repair, upkeep, redecoration or other maintenance (including cleaning which involves the use of water or an abrasive at high pressure, or the use of corrosive or toxic substances), de-commissioning, demolition or dismantling of a structure;</i></p> <p>4.b) <i>the preparation for an intended structure, including site clearance, exploration, investigation (but not site survey) and excavation (but not pre-construction archaeological investigations), and the clearance or preparation of the site or structure for use or occupation at its conclusion;</i></p> <p>4.c) <i>the assembly on site of prefabricated elements to form a structure or the disassembly on site of the prefabricated elements which, immediately before such disassembly, formed a structure;</i></p> <p>4.d) <i>the removal of a structure, or of any product or waste resulting from demolition or dismantling of a structure, or from disassembly of prefabricated elements which immediately before such disassembly formed such a structure;</i></p> <p>4.e) <i>the installation, commissioning, maintenance, repair or removal of mechanical, electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services which are normally fixed within or to a structure.</i></p>	
H&S Competence	<p>1. Suppliers must have access to competent H&S advice and support for the jurisdictions in which they operate. These competent persons must make themselves familiar with the Barclays Global Minimum Requirements (GMR) See HSE-5, and they must be familiar with local legislation, bylaws or other legally enforceable requirements for the locations where the supplier delivers services/activities.</p> <p>2. Suppliers must identify a competent person on site who will be responsible for the H&S of their activities (including subcontractors where applicable). These identified competent persons are to act as the contractors’ (and the subcontracting company’s) representative on site.</p> <p>3. Self-employed suppliers/contractors may nominate themselves as holding the roles in 1. and 2. above where they have the necessary competence to do so.</p>	<p>Suppliers need to have access to competent health and safety advice to support them in meeting their H&S duties and be familiar with the Barclays Global Minimum Requirements (GMR).</p> <p>A competent person is someone with the necessary skills, knowledge, and experience and, where required, legally recognised qualifications to manage H&S.</p> <p>To ensure that works are being completed, as a minimum, in line with Barclays’ H&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>
Training	<p>1. Suppliers must:</p> <p>1.a) ensure that their personnel are suitably competent and vetted prior to conducting any work related activities on a Barclays site.</p> <p>1.b) be able to demonstrate that their employees have received adequate instructions how to conduct all jobs/activities safely.</p> <p>1.c) must provide employees with the correct equipment, and maintain that equipment in safe</p>	<p>Suppliers are required to provide H&S information and training to their employees and sub-contractors to:</p> <ul style="list-style-type: none"> • ensure that all staff know how to work safely and without risks to health; • develop a positive H&S culture, where working safely and healthily becomes second nature to everyone; and

	<p>condition</p> <ol style="list-style-type: none"> 1.d) ensure that employees are sufficiently trained to carry out the work safely. 2. Activities conducted must be in compliance with defined safe methods of work, which must as a minimum comply with Barclays Global Minimum requirements (or local legislation, bylaws or other legally enforceable requirements if they require a higher level of health and safety control, or conflict with the requirements of the GMR). 3. Barclays reserves the right to request confirmation of training, maintenance and or method statements at any time. 	<ul style="list-style-type: none"> • meet the legal duty to protect employees' H&S.
<p>Legal Compliance</p>	<ol style="list-style-type: none"> 1. Suppliers must ensure that they have adequate processes to identify all applicable H&S legislation within the jurisdictions they are providing services to Barclays, and must be able to demonstrate their compliance to legislation upon request. 2. Suppliers must maintain a legal register of all H&S related legislation applicable to their activities, which is reviewed at least annually; they must be able to demonstrate compliance upon Barclays request. 	<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 with a maintained and at least annually reviewed legal register.</p>
<p>Barclays Global Minimum Requirements (GMR) Control Delivery</p>	<ol style="list-style-type: none"> 1. Suppliers must comply with the 'Barclays Global Minimum Requirements' (GMR) and apply them to all activities that may expose people to harm. 2. GMR applies to all Barclays suppliers, contractors and their sub-contractors, with the exception of the following situations: <ol style="list-style-type: none"> 2.a) where there is a Barclays approved Dispensation, Waiver or Breach (DWB) in force. 2.b) where local legislation, bylaws or other legally enforceable requirements require a higher level of health and safety control, or conflict with the requirements of the relevant GMR, then the legally enforceable requirements must take precedence over the requirements of the GMR. 3. Suppliers must be able to demonstrate compliance to this SCO upon Barclays request. 4. Barclays reserves the right to verify, for example by auditing, that suppliers, contractors and their subcontractors have complied with GMR (or where local legislation, bylaws or other legally enforceable requirements require a higher level of health and safety control, or conflict with the requirements of the GMR, that these have been identified and are being adhered to). 5. Suppliers, contractors and sub-contractors must ensure that their employees are aware of, and comply with, the expectations set out in the Barclays Global Minimum Requirements. Special attention must be given to any activity related to the installation of fire stopping, which must comply with Barclays 'GMR Penetration'. <p>Note: The Barclays Construction H&S Manual is a GMR; copies of all GMR are available from the Barclays H&S Service.</p>	<p>Barclays Global Minimum Requirements (GMR) have been set to ensure that there is a minimum standard of H&S control measures to prevent harm to people.</p> <p>Suppliers must ensure that they comply with the Global Minimum Requirements unless local legislation, bylaws or other legally enforceable requirements require a higher level of health and safety control, or conflict with the requirements of the relevant GMR, then the legally enforceable requirements must take precedence over the requirements of the GMR.</p>

	Note for reviewers: Check and confirm with the SM or via ORAC if there is a DWB in place for this control	
Safe Systems of Work	<ol style="list-style-type: none"> 1. Suppliers and their subcontractors must ensure that all activities that they undertake are supported by a task specific risk assessment and method statement. 2. Task specific risk assessment must: <ol style="list-style-type: none"> 2.a) identify any hazards and risks associated with such task, 2.b) identify the environment where such task is being completed and 2.c) establish safety control measures to eliminate or mitigate risks from identified hazards. 3. Method statements must comply with GMR (see HSE-5) and as a minimum must contain: <ul style="list-style-type: none"> • A step-by-step outline of how the job will be undertaken • Details of any resources (tools, fire extinguishers etc.) and/or manpower required • Expected duration of works, persons responsible on site and contact details • Any isolations required (electrics, smoke heads, alarms etc.) • Specific Personal Protective Equipment (P.P.E) required • Any permits required • Waste disposal considerations • Emergency arrangements 4. Copies of Method statements must be readily available for Barclays review if requested. 	<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&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, must be considered before the task begins.</p>
Sub-contractor Control	<ol style="list-style-type: none"> 1. Suppliers are responsible to undertake a formal pre-qualification and vetting process to determine that the subcontractors they use have appropriate H&S arrangements in place and that any subcontractors used are competent to carry out all of the activities for which they have been assigned. 2. Suppliers are responsible for ensuring that their subcontractors operate and to comply with the Barclays Global Minimum Requirements (GMR) (see HSE-5), or local legislation, bylaws or other legally enforceable requirements if they require a higher level of health and safety control, or conflict with the requirements of the GMR, at all times. 3. Suppliers are responsible for monitoring the on-going H&S performance of subcontractors which they employ and must ensure that they retain suitable documentary evidence of performance, and include subcontractor performance and incidents with their own reports as outlined in the H&S SCO. 4. If a supplier is using a Tier 1 principle subcontractor(s), where the sub-contractor has been appointed to act wholly and independently on the suppliers behalf, then the sub-contractor must be treated a supplier themselves and are required to complete all requirements that are expected from a supplier directly. 5. Barclays reserves the right to verify, for example by auditing, that contractors, and their subcontractors, are complying to the GMR (or local legislation, bylaws or other legally enforceable requirements if they require a higher level of health and safety control, or conflict with the requirements of the GMR). 	<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&S arrangements (which meet Barclays expectations set in the H&S SCO) to do the job safely and without creating risks to H&S.</p> <p>Principal contractor will be directly responsible for ensuring their sub-contractors adhere to the requirements set out with the H&S SCO.</p>

	<p>6. A legal breach or failure to comply with GMR by a sub-contractor will be accountable against the supplier directly.</p>	
Inspections	<p>1. For activities carried out on a Barclays premises for more than one day or shift, regular H&S inspections of the Supplier's work areas/activities must be undertaken to review working practices, materials and quality of workmanship.</p> <p>2. Where a documented inspection takes place (i.e. not a visual observation only), findings should be recorded, documented and made easily available Barclays upon request.</p> <p>3. Inspections must include required actions to remedy unsafe conditions or unsafe acts. The supplier must record actions, and monitor actions to closure.</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 and reserve the right to request copies of documented inspections upon request.</p>
Accident reporting	<p>1. All incidents and accidents that resulted in harm or could have resulted in harm to people on Barclays premises must be reported to Reportline on the local Reportline number (available at each Barclays Site). Time frames for certain incidents vary dependant on severity.</p> <p>2. Timeframe for reporting Incidents resulting in:</p> <p>I Fatalities and potentially life changing injuries MUST be reported to the Barclays site manager, the supplier manager and Reportline immediately (Note: Reportline operates 24hrs a day, 365 days a year)</p> <p>I Medical/hospital treatment Cases, first aid cases and other such incident which result in the harm to people and/or damage to a Barclays premises must be reported to Reportline within 24 hours of the incident</p> <p>I Near misses and for the record only incidents must be reported to Reportline within 48 hours</p> <p>3. It is the responsibility of the supplier to investigate all accidents where they only result in harm to their own employees or subcontractors (i.e. no Barclays employees or customers are harmed).</p> <p>4. Any harm or incidents involving Barclays staff or customers as a result of a suppliers activities and/or omission of their activities MUST be reported in line with the outline process above, to ensure engagement with the Local Barclays H&S Service who will support with any required investigations.</p> <p>5. The Barclays H&S Service will lead any investigations (including joint investigations) where Barclays employees or customers are harmed.</p> <p>6. Where a supplier's employee has had an accident that is reportable to the local enforcement authority, whichever entity is legally required to report it, must do so. In the UK for example, it is the responsibility of the supplier themselves to report such incidents to the local enforcement authority, even if they occur on a Barclays premises. Confirmation of such reports must be forwarded to Reportline whom will update the Local Barclays H&S teams.</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 report incidents within the correct time frame as outlined in the H&S SCO to Barclays:</p> <ul style="list-style-type: none"> • Fatalities / Potentially life changing injuries must be reported immediately • Medical/hospital treatment Cases, first aid cases and other such incident which result in the harm to people and/or damage to a Barclays premises must be reported to Reportline within 24 hours • Near misses and for the record only incidents must be reported to Reportline within 48 hours
H&S Monitoring Indicators	<p>1. Suppliers are required to track and monitor their H&S performance through performance indicators.</p> <p>2. Suppliers must clearly define their performance indicators and provide data and analysis relating to Barclays activities only. A non-exhaustive list would include at minimum:</p>	<p>The effectiveness of H&S controls and overall H&S Management System performance is measured and monitored through Risk Indicators and agreed Management & Business Information</p>

	<p>2.a) Leading Indicators: Completion of statutory Planned Preventative Maintenance (PPM) schedules, inspections, risk assessments, surveys, training completion, completion of corrective actions within set timeframes.</p> <p>2.b) Lagging indicators: Occupational illness, accidents and incidents (including for the record only, near-misses and locally reportable incidents), findings from audits including hazards/faults/weaknesses in performance standards and/or systems</p> <p>3. All indicators must be analysed for trends and be monitored to identify areas for continual improvement.</p> <p>4. A summary of performance data must be reported to the Supplier Manager (who will forward to the Barclays H&S Service) via the procurement portal at least quarterly.</p>	<p>(MI/BI) reporting and monitoring criteria, for health as well as for safety.</p> <p>By measuring H&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> <p>A summary of the performance data must be sent to the supplier manager to forward to the Barclays H&S Service.</p>
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