

# Health, safety and environmental protection policy

**Policy ownership:**

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**Effective date:**

13 October 2023

**Review date:**

01 September 2025

**PLC board adoption date:**

12 October 2023

**Reference to applicable DB policy:**

This policy is compatible with DB policies: "101.0210 Risk Minimization", "190.0100 Environmental Management", and and DB Guideline "135.1001A01 Reportable events".

**Business area of author:**

Corporate Affairs

## 1. Policy statement

**To support our Purpose "to connect people and communities safely, reliably and sustainably, and to deliver these services in a better way, every day" we have a best practice approach safe systems of work, that protect our passengers, employees, the public, our clients, supply chain and the environment.**

**We will achieve this by:**

- Assessing, understanding and managing both our risks and our opportunities
- Embedding our Group EHS Minimum Standards
- Creating a psychologically safe culture in which we hold each other accountable
- Intervening if we see an unsafe act, workplace or risk of pollution
- Preventing incidents, pollution and unnecessary use of resources
- Empowering and encouraging each other to work in a safe and healthy way.
- Communicating relevant health and safety matters
- Continually improving our management systems continually
- Setting measurable objectives and targets in business plans
- Providing accurate data to assure ourselves that risks are managed
- Learning from our successes and incidents, and sharing lessons
- Working with suppliers and partners to pursue best practice
- Complying with DB Arriva standards and the law.

## 2. Who must comply with this policy?

Our health and safety and environmental protection policy applies to us all, whether you are a full-time, part time, contract or temporary employee, and extends to all our majority-owned businesses. Where we have a minority interest, we will encourage business partners and others to uphold this policy along with our EHS standards.

This policy and our standards together form the framework through which we will ensure that we meet our health and safety and environmental protection obligations.

## 3. Description of the policy issue

This policy supports the delivery of our Purpose “to connect people and communities safely, reliably and sustainably, and to deliver these services in a better way, every day” and outlines what is expected from us all in terms of ensuring the health and safety of our passengers and employees, the wider public, our business partners and assets. It also outlines our expectations to manage environmental pollution risk. It shows the actions we will take to prevent incidents, outlining the expectations and responsibilities of all those who work with DB Arriva to deliver great performance within our ten “Environment, Health and Safety Guiding Principles”.

## 4. Your responsibilities

### 4.1 Individuals

Everyone – health and safety is your responsibility, so we will all hold each other accountable to this policy and the Minimum Standards; understand our commitment to ‘We Do The Right Thing’ for our health and safety; and take this into account when making all decisions. Each individual holds an element of personal responsibility for their own safety notwithstanding of Arriva’s overall responsibility for safety.

**Group Safety Director** - will provide strategic direction for, and assurance of, effective Group-wide strategies, management systems (including Group policy and minimum standards), shape thinking on emerging organisational risks and inform decision making on interventions and resource allocation aligned with the organisation’s appetite for risk. The Safety Director will be the senior professional adviser to the Group Chief Executive Officer.

**Group Chief Executive Officer** - is accountable for ensuring this policy is implemented by the Business Unit Managing Directors. They are to chair the Group Safety Committee. Performance will be reported regularly to the DB Arriva Board.

**Business Leaders** - including divisional and functional directors, are accountable for ensuring that business areas under their control (including majority-owned joint ventures where DB Arriva is the controlling interest or is the operator) implement and maintain arrangements in compliance with this policy, the DB Arriva standards and relevant legislation, through active leadership.

### 4.2 Businesses

Each business will achieve the following ten principles (from Group Minimum Standard “Environment, Health and Safety Guiding Principles”):

1. **Have written environment, health and safety systems** to enhance performance and comply with the law.
2. **Set safety objectives** and review performance regularly to ensure continual improvement.
3. **Define safety responsibilities and competence**, including accountabilities and authorities, with suitable and adequate professional advice.
4. **Make health, safety and environmental protection an integrated part of management**, change management and the decision-making process, determining and providing the resources needed.
5. **Establish supply chain requirements** for health, safety and environmental protection using life cycle thinking for partners and contractors.
6. **Actively manage risks and opportunities** by identifying the law in a legal register and the risks that arise, mitigating or capitalising on them through controls and initiatives.
7. **Engage employees effectively** through communication, effective and regular consultation, participation, training and supervision.
8. **Manage incidents**, with the involvement of key stakeholders to mitigate the effect of any losses, promote recovery of any affected persons or environments, keep accurate records and report relevant significant incidents to the Group, using the [incidents@arriva.co.uk](mailto:incidents@arriva.co.uk) reporting process. More information can be found via this [OneArrivaNet Link](#).
9. **Proactively monitor and achieve a sufficient level of assurance**, proportionate to their risk, documenting and addressing corrective actions, to continually improve.
10. **Engage their stakeholders** to achieve greater health, safety and environmental protection understanding and improve performance.

#### 4.3 Corporate Centre

**The Group Safety Committee** – will be chaired by the Group Chief Executive Officer and will have the Chief People Officer and Business Unit Managing Directors as members supported by the Group General Counsel and Group Safety Director.

It is a subcommittee of the Arriva Management Board ('AMB') and assists the Arriva plc Board in obtaining assurance that the appropriate systems are in place to manage safety. It will provide a consolidated group overview of our operational safety performance. However, the board of each operating subsidiary company is ultimately responsible for the EHS performance of their business.

**The Corporate Centre Safety team** - will develop and maintain a health, safety and environmental protection handbook which supports businesses to deliver great safety performance. It will include as a minimum the Group safety strategy, the health, safety and environmental protection policy, the related Guiding Principles, and a series of Group Minimum Standards to which all businesses must comply. It will also deliver a structured assurance programme of risk-based audits.

**The Group Communications Team** – will provide a 24/7 incident report monitoring service for businesses who experience significant incidents (as defined in DB Guideline 135.1001A01 Reportable events), offering media support and escalation to Senior management teams, the AMB and/or DB KonzernSicherheit Monitoring Centre as appropriate.

## 5. How to raise a concern

Anyone can raise a concern if they believe this policy is being, or at risk of being, breached by using the Group's confidential 'speak up line' on + 44 191 528 5322 or [inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk).

DB Arriva employees should raise any concern as soon as practically possible with their line manager, local compliance officer, or the person responsible for environment, health and safety in their business. Where this is not possible, or the employee does not feel able to do so, the Group's confidential 'speak up line' should be used on + 44 191 528 5322 or [inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk).

## 6. Breaches of this policy

Breaches of this policy must be managed in accordance with the disciplinary policy applicable to the local business.

## 7. Review

Subject to the findings and recommendations of the DB Arriva Group Safety Committee's monitoring, this policy will be reviewed at least every two years.

### 7.1 Policy Monitoring

The DB Arriva Group Safety Committee will monitor the effective implementation of this policy, especially its suitability and adequacy, cross referenced to any change in policy at the DB Group level and improve it where appropriate. It will report the results quarterly to the Arriva Management Board and the DB Arriva Board.

The Group Safety Director will independently present a six monthly review of safety, health and environmental pollution performance to the DB Arriva Board.

### 7.2 Monitoring and Assurance

Arriva operates a three lines of defence governance model with respect to health, safety and environmental protection. Each line is explained below:

1. Maturity Self Assessment – Biannually, each operating unit reviews its compliance against our Arriva Minimum Standards. The results are collected via the Group Compliance team. Where non-compliance to a standard is declared, an action plan will be submitted by the operating unit that is reviewed by the DB Arriva Group Safety Committee.
2. Risk Based Assurance Visit – Biennially, each operating unit will be visited by DB Arriva's Group Safety team. Sampling techniques are used to gain assurance that the Group Minimum Standards are being met. After each visit a report is issued to the Operating Unit and progress will be monitored by the DB Arriva Group Safety Committee.
3. Independent Audits - This last line allows for independent subject matter experts to highlight blind spots to help drive continual improvement. This is done through ISO45001 certification, DB technical Audits and Insurance Audits.

## 8. Further guidance

This policy is underpinned by our health, safety and environmental pollution standards, which can be found on OneArrivanet, along with guidance and resources.