



Severn Group

# Health & Safety Framework

DECEMBER 2023

We value the sense of belonging and family spirit across our operations. Everyone at Severn Group contributes to our success – we are incentivised and empowered to positively impact business achievements, environmental sustainability and high performance in safety.



**SEVERN**  
Superior Valve Engineering

# Contents

Introduction	3
Annual Report	3
Policy	3
Strategy	4
Reporting	7
Group Learnings	7
Technology	8
Onboarding	8
Communication and Engagement	8
Contemporary Working Practice	9
Gap Analysis and Audit	9
Emergency Response	10
Appendix 1 - Health & Safety Policy	11
Appendix 2 - Annual Report	12



# Introduction

## **Introduction**

This framework document sets out the commitments, Policy and arrangements for Contour Holdings Limited (Severn Group) in terms of Health and Safety. The framework defines our overall health and safety assurance programme. It is an important part of a wider Environment, Social and Governance (ESG) sustainability agenda for Severn Group and its investors Blue Water Energy LLP.

This framework will be subject to annual review as part of the Plan, Do, Check, Act process detailed below.

## **Annual Report**

The annual report is prepared each year and summarises the years performance and compares with previous years. The report contains metrics such as KPIs and audit scores, illustrated with common and specific themes. The most recent annual report is detailed in the Appendix.

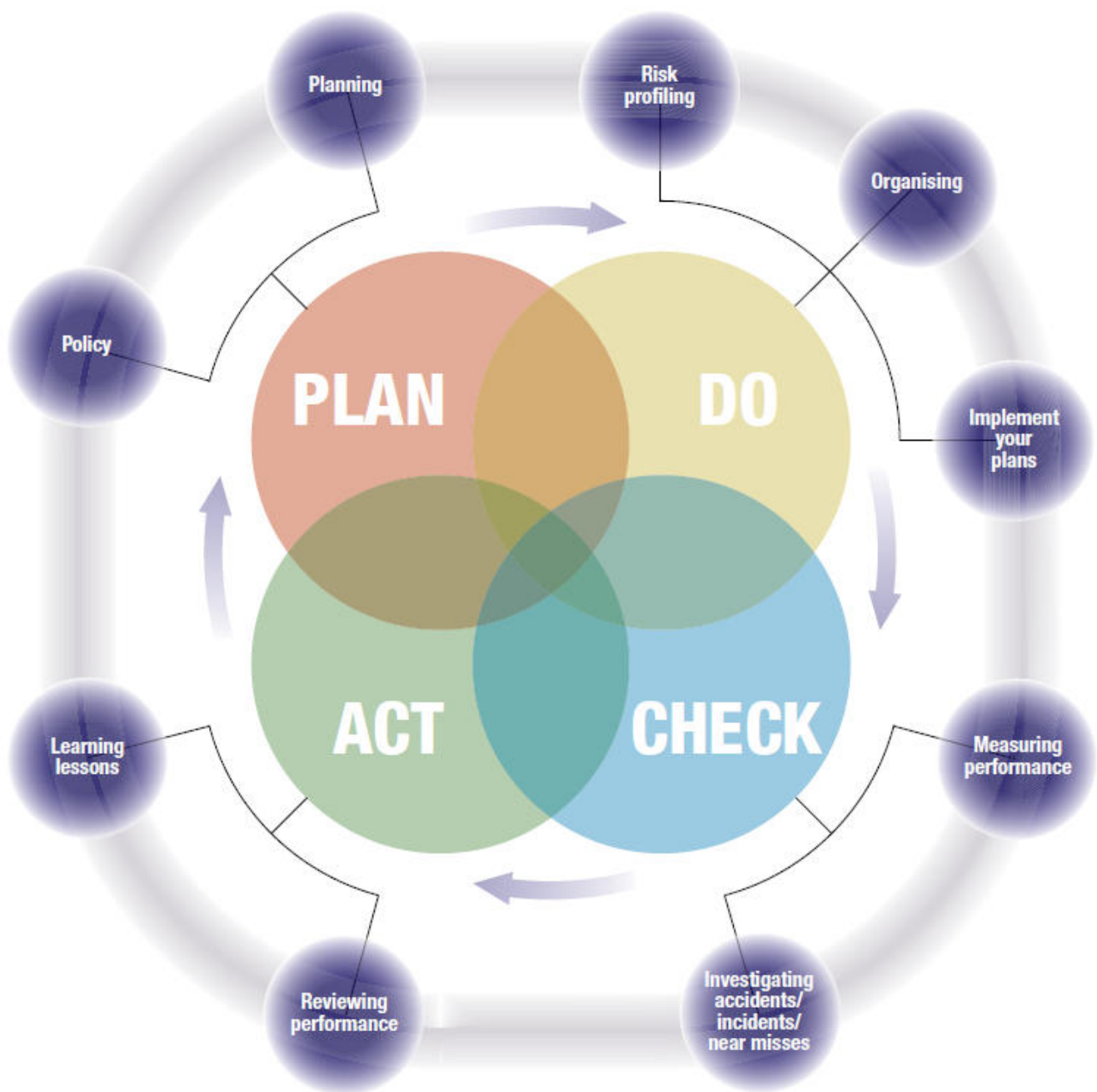
## **Policy**

Severn Group's Health & Safety Policy Statement is provided in the Appendix.

# The Strategy

## Actions

The following is a summary of the action planning process we use to achieve our goals and targets.



# The Strategy

Severn Group completes the following actions to ensure successful implementation of this framework in line with the best practice Plan-Do-Check-Act process.

## Plan

- Implement a policy that sets the direction for health and safety.
- Set group targets for key metrics (separate action).
- Agree with the operating divisions divisional targets to drive group performance as part of our commitment to ongoing performance improvement.
- Publish a schedule of reporting requirements and external audits (see detail within Audit section below).

Each entity is required to have an annual improvement plan which includes:

- Risk reduction initiatives.
- Actions from the annual benchmark audit.
- Consultation arrangements.
- Specific training programmes.
- Activities which are legally required, for example inspections by external experts of high-risk equipment, or equipment where failure puts a team member health at risk.
- An internal inspection and audit programme.

## Do

- Integrate good health and safety management into it's wider business decision making process.
- Ensure board members take opportunities presented through site visits to re-enforce the safety messages and review local processes.
- Appoint a competent source of advice and will require each operating division to do the same.
- Understand the health and safety performance and standards of companies it may acquire as part of its due diligence processes.

Severn Group must ensure, through audit, review, and governance processes, that entities:

- Implement required policies and procedures as part of a locally owned Health and Safety Management System.
- Resource health and safety adequately.
- Complete and implement risk assessments and risk management measures.
- Involve and consult the wider teams through formal consultation processes.

# The Strategy

- “Design in safety” as part of change management processes.
- Clarify within local management systems, the specific accountabilities of managers and team members to ensure good health and safety performance. This includes the principle that “safety is a line management accountability” as well as to define those responsible for the management of specific risk areas – examples would include fire, machinery safety and contractor management.

## Check

- Have health and safety as a standard item for board meetings.
- Ensure appraisals for managers include personal safety objectives and assess the managers contribution to safety improvement in their area of responsibility.
- Ensure lost time injury and other significant risk incident investigations are approved at board level, supported by their appointed competent source of advice.
- Require periodic reporting against targets as part of our overall governance process.

Severn Group will ensure that operating entities:

- Report key metrics both proactive and reactive, for consolidation and periodic board review. As detailed in the section on Reporting.
- Share updated improvement plans for review by board members and their competent source of advice.
- Have an annual, independent audit as detailed within the Audit section below.

## Act

A formal review of health and safety performance is undertaken annually, with a report published with recommendations to process changes and any updates to this framework document. This report is issued internally, as well as to investors and other stakeholders.

This annual review:

- Examines whether the health and safety policy reflects the organisation’s current priorities, plans and targets.
- Tests that performance and performance improvement is in line with group goals.
- Examines whether risk management and other health and safety systems have been effectively reporting to the board.
- Reports health and safety shortcomings, and the effect of all relevant board and management decisions.
- Decides actions to address any weaknesses and monitor their implementation.
- Recognises and celebrates good health and safety practice and performance.

# The Strategy

## Reporting

Severn Group has processes in place for the reporting of H&S matters from all of our operations, this as part of ongoing governance, performance evaluation and the preparation of the Severn Group reports.

Our reporting processes are consolidated into periodic and annual group reports which are subject to scrutiny within the annual review described above.

Operating entities will report on a suite of KPIs and metrics which are common to all operating sites and regions.

The metrics are to be reported by department at site level. This to ensure even contribution for proactive reporting across teams and in line with our principle of safety being a line management accountability.

As well as periodic reporting, the following significant incidents will be reported and escalated to group level on the day they happen or as soon as the management team is aware:

“Significant incidents” are defined below. This is not an exhaustive list and where there is concern or doubt, operating divisions should report and escalate by default, for clarification and support.

The following is reported and escalated, whether on or off of our operating sites regardless of whether employees, agency staff or contractors are involved:

- Fatalities, or deaths whether work related or not
- Lost time injuries
- Incidents reportable by local legislation to the authorities, e.g. RIDDOR reports in the UK
- Injuries or ill health which require off site medical treatment
- Occupational diseases caused or made worse by our operations
- Dangerous occurrences
- Serious near misses
- Any contact from local authorities or other regulatory bodies appointed to inspect health and safety standards at our operating sites

## Group learnings

For all Significant Incidents, safety alerts are issued to applicable sites which contain:

- Information regarding the incident and the learnings from it.
- Were appropriate, demands for evidence from each site that the specific risk which gave rise to the significant Incident is being managed appropriately.



# The Strategy

## Technology

Severn Group has effective solutions in place, appropriate to the business, which make best use of technology and innovative techniques to drive best practice.

This includes:

- Effective document management solutions, enabling current documents to be found and shared efficiently.
- Repositories for action management. Ensuring that actions which result from risk assessments, audits, incidents or team reporting, are delegated, tracked and completed.
- Incident reporting systems which:
  - Facilitate same day escalation
  - Guide local teams through an effective investigation process.
  - Determine root causes.
  - Define actions.
  - Delegate and track the completion of actions.

These solutions are integrated wherever possible for efficiency and to prevent repetition or gaps.

## Onboarding

Our entities have onboarding processes that:

- Recruit and select new team members effectively. This includes, as appropriate, testing for competence and language skills and evidencing qualifications.
- Provide an induction for every new member of our team that gives them an initial orientation to the workplace before passing them on to their line manager for a local induction – this is the opportunity for the local manager to demonstrate that health and safety is personally important to them.
- Provide a seamless transition from induction to on-the-job training.
- It is our intention that we take every opportunity to create the right first impression – the standards and expectations we have of our new team members.

## Communication and Engagement

Severn Group will:

- Be transparent
- Promote health and safety through a variety of methods as part of a cascade to the operating entities



# The Strategy

Severn Group will ensure that entities:

- Adhere to local legislation requiring consultation with worker groups.
- Go beyond legal minima to engage with our teams such that they can play their part in performance improvement. We recognise that often the people that understand the risks best are those closest to them. To this end we will engage our local teams in all risk management processes.
- Implement measures such that all team members can and do report issues such as hazards and their ideas for improvement.

## Contemporary Working Practice

Severn Group will ensure that entities:

- Have internal team members that subscribe to legal institutions, trade bodies and similar to ensure that new legislation is complied with and innovations in the field are considered and implemented where appropriate. Further, to make best use of external competent advice to a similar end.
- Focus on behaviours as well as physical conditions. Have a process for reporting and measurement of behavioural observations.
- Do not “re-invent the wheel”, instead research how their risks are best managed elsewhere – collaborate within Severn Group, engage with trade bodies, review appropriate guidance.
- Seek to “design in” safety across our operations, this in terms of processes as well and equipment improvement.

## Gap Analysis and Audit

We have an external independent audit program, the results of which is detailed in the annual report.

The audit enables us to benchmark performance and risk levels across the operations. The audit output comprises a detailed report and executive summary containing the focus areas which will drive performance improvement.

Going forward all of our operations will be audited at a frequency defined by their scale and risk level.

In future we intend to audit potential acquisitions as part of our due diligence process.

# The Strategy

## Emergency Response

Severn Group will:

- Require emergencies to be escalated to board level as detailed in the section on Reporting.

Severn Group will ensure that entities:

- Review their major risks and implement plans to reduce the risk of occurrence.
- Implement crisis management and business continuity planning processes to reduce the impact of major incidents whether they arise from within or external to the operating sites.
- Implement and regularly review process for the management of the risk from fire. This may include fire risk assessments, fire protection plans and the provision and maintenance of equipment for the reduction of the risk of fire and the management of fires that do occur.



# Appendix

## Health and Safety Policy Statement

Severn Group (meaning, collectively, Contour Technologies Limited and its subsidiaries, including but not limited to Severn Glocon UK Valves Limited, LB Bentley Limited, MCE Group Limited, Severn Glocon Valves Private Limited, ValvTechnologies LLC) is committed to meeting its health and safety obligations to its personnel and anyone visiting our premises or affected by our work.

Severn Group is committed to:

- Providing safe and healthy working conditions for the prevention of work-related injury and ill health as appropriate to the purpose, size and context of the organisation and to the specific nature of its OH&S risks and opportunities.
- Ensuring that health and safety is as important as any other function.
- Providing a framework for setting OH&S objectives.
- Fulfilling legal requirements and other requirements as applicable in the locations in which we operate.
- Identifying and managing potential hazards and reducing OH&S risk by means of risk assessment.
- Continuously improving performance and our management systems.
- Providing appropriate resources, supervision and training.
- Ensuring our team members and their representatives are engaged, consulted and participate in matters affecting their health, safety and well-being.
- Collaborating and sharing best practices across the Group.
- Ensuring that across the Group, health and safety is a line management accountability.
- Monitoring and auditing health and safety performance to support continual improvement and to be transparent in our performance.

This Policy Statement shall be:

- Documented and maintained.
- Communicated via Company notice boards, Company intranet (where applicable) and Company website as a minimum.
- Made available to interested parties.
- Relevant and appropriate to the organisation.

Ultimate responsibility for the Health and Safety Management System (Management System) which satisfies and / or works to the spirit of the requirement of ISO 45001 is that of the Chief Executive Officer.

Each entity has appointed a Senior Manager as the Management Representative with responsibility and authority for all matters pertaining to the system elements.

Each entity has appointed a competent person who will provide support, guidance and training in matters relating to OH&S and who is focused on ensuring in conjunction with the organisations management the integrity of the Management System.

Severn Group is responsible for providing adequate and appropriate resources, competency, awareness & training to implement the Policy.

The Management System will be periodically audited to maintain compliance with relevant International Standards.

This Policy Statement shall be reviewed during the Management Review process.

Signed: 

Date: 6 December 2023

Perttu Louhiluoto  
Chief Executive Officer

# Appendix

## Annual Report 2023

### Performance

Entity	2021		2022		2023	
	LTIs	LTIFR	LTIs	LTIFR	LTIs	LTIFR
Severn Glocon	3	Not available	1	2.2	4	4.5
ValvTechnologies	0	0	0	0	0	0
India Hub	0	0	0	0	0	0
LB Bentley	4	Not available	5	21.2	2	7.6
CTL	Not available	Not available	0	0	1	26.9
Mars	0	0	0	0	0	0

### Independent Benchmark Audit

Entity	Audit Score	Positives	Opportunities and Requirements
ValvTechnologies	51%	0 LTIs for 3 years , Good standards, Strong functional leadership	Develop plan, Management system, Internal audits, Risk assessments
Severn Glocon	59%	Emergency preparedness, Testing of systems and equipment, e.g electrical, lifting, pressure	Develop plan, Poor LTIFR, Line management accountability, Implement HSMS, Engagement, Behaviours
India Hub	82%	Strong and well implemented HSMS, Engagement programme, Culture of compliance, Risk assessments, Lean Program, Housekeeping	Language barriers, Engagement of all staff
LB Bentley	37%	New HSE Manager, Apprentice mentoring process, 5S implementation in assembly and test, Visitor management process, Improved induction process	Improvement plan, Line management accountability, Prioritisation and resource, KPIs and measures, Engagement, Management system, 5S, Contractor management, Workplace transport

### Common Themes for Improvement:

- The development of common proactive measures across Severn Group, that will be used to track progress and ensure our continuous improvement commitments are met.
- Comprehensive and well implemented health and safety management systems.
- Improvement action plans.
- Line management accountability, particularly at front line manager level.
- Engagement and consultation.



At Severn Group, our business success flows from expertise – from technical knowledge and experience that position us as a leader in our field. Not everything, however, can be engineered. The Values which underpin that success stem instinctively from the culture we seek to sustain. Everything we do is tested against our Values, and our people are encouraged to apply them every day: they are the stewards of our brand, our reputation, our heritage, our ambitions.



**Customer**



**Integrity**



**Excellence**



**Accountability**



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