Health and Safety Rules

DECEMBER 2020

HEALTH AND SAFETY STATEMENT

VIA Outlets ("VIA" or "we", "our") is fully committed to provide a safe and healthy working environment for all employees and to take reasonable care for the safety of guests, visitors and others who come onto VIA premises. Employees have an equal responsibility to observe all Health and Safety requirements and to work in such a way as not to endanger themselves, their colleagues, guests and visitors.

To achieve this mutual objective, VIA has developed the statement of intent below. It will be brought to the attention of all employees on first joining VIA and will be available within each of VIA's premises.

Statement of Intent

VIA Outlets is committed to ensuring a culture of Health and Safety best practise and ensure compliance with applicable Health and Safety regulations and legislation, with particular emphasis on guest safety in our centres.

We acknowledge that a key aspect of successful Health and Safety management is to have effective guidelines and rules, organisation and arrangements, which reflect the commitment of senior management. To maintain that commitment, we have created Health and Safety Rules and will continually measure, monitor and revise where necessary, to ensure that Health and Safety Rules are adequately maintained.

We will ensure a systematic approach to identifying hazards, assessing risks, determining suitable and sufficient control measures and informing employees of the correct procedures needed to maintain a safe working environment for themselves and others.

We will provide, so far as is reasonably practicable, safe places and systems of work, safe handling of materials and substances, the provision of adequate safety equipment and will ensure that appropriate information, instruction, training and supervision is given.

We regard all Health and Safety legislation as the minimum standard and expect management to achieve their targets without compromising Health and Safety.

Otto Ambagtsheer
Chief Executive Officer

A copy of these Health and Safety Rules is accessible on VIAShare. These Health and Safety Rules will also be available for viewing in each of VIA's premises and with the VIA Outlets Legal team.

These rules will be reviewed and updated periodically. This will be the responsibility of the Head of Operations, Legal and HR teams, who will ensure that all locations are notified of changes.

Contents

VIA OUTLETS RULES FOR HEALTH AND SAFETY

THE PURPOSE OF THE RULES

These Rules will help the Centres ensure that Health and Safety is managed in a coordinated and consistent fashion across the VIA Outlets business to ensure the safety for our employees and guests. These Rules have been developed to address safety objectives on a range of safety issues which are common across the Centres.

Centres are unique environments which are organised differently, have different cultural requirements and different laws that apply but also have common issues. On this basis the Rules cover a wide range of Health and Safety issues to create a consistent approach.

The intention is that the Centres will develop, implement and maintain a Health and Safety management system which meets all the Rules.

These Rules set out VIA Outlets' expectations in relation to each Centre's approach to Health and Safety. Subject only to compliance with any local laws or regulations, the Rules are to be implemented by the Centre Management Teams through local policies and procedures (in local language as appropriate).

These Rules are internal, they only apply to VIA Outlets and must not be disclosed to any third parties.

RISK MANAGED APPROACH

At the core of VIA Outlets' safety strategy is a risk managed approach to address potential safety hazards. This places significant emphasis on risk assessments including:

- identifying or assessing hazards or risks;
- making decisions about suitable control measures;
- implementing and maintaining control measures; and
- monitoring and review.

This emphasis on risk management encourages local Centre level assessment and evaluation of risks, meaning that as the Centres evolve and grow, the safety arrangements will be able to evolve, therefore embedding safety into the VIA Outlets' culture in a consistent way.

LEGAL COMPLIANCE

Centres are responsible for compliance with the Health and Safety regulations and standards which apply to their markets. Whilst the Rules have been written to ensure alignment with international Health and Safety good practice, in the unlikely event of any conflict between local market Health and Safety regulations and the Rules then the priority is to maintain legal compliance and thereafter identify appropriate alternative methods to align with the intention of the Rules wherever possible.

For ease of reference, the Rules have been sub-divided in four main chapters:

I. OPERATIONAL MANAGEMENT OF THE VIA OUTLETS CENTRES
II. VIA OFFICE ENVIRONMENT
III. HEALTH AND SAFETY ISSUES IDENTIFIED IN STORES
IV. CONTRACTORS WORKING IN CENTRES

I. OPERATIONAL MANAGEMENT OF THE VIA CENTRES

1. RISK ASSESSMENTS

VIA Outlets is committed to developing and maintaining the Centres to a high standard.

Centres can be extremely busy places with high levels of footfall and vehicle movements. One of the primary objectives is to provide a safe environment and whilst it is unlikely that every risk can be eliminated, the Centre Management Teams are expected to know the significant foreseeable risks associated with their Centres and the measures required to effectively manage these risks.

These Rules set out expectations for a range of foreseeable risks likely to be applicable to many if not all of the Centre activities, conditions and operations including, for example, slips, trips and falls, play areas, traffic management, service yard safety and landscaping.

These Rules are not intended to exhaustively address all foreseeable risks and each Centre will, in addition, have unique characteristics and features together with applicable local market regulations and standards. Therefore, Centre specific risk assessments must be used to identify foreseeable risks.

In order to be consistent and be able to demonstrate a comprehensive approach, a general written assessment of significant risks must be carried out and periodically reviewed. This may involve input from local authorities where required by the local country regulations.

RISK ASSESSMENT REVIEW

Risk assessments must be reviewed:

- In the event of a relevant accident.
- In the event of an incident or near miss.
- Where there is any significant change to activities, conditions and operations and or evidence that the assessment is no longer valid.
- In accordance with any relevant market regulations or standards.
- Periodically, to ensure controls remain suitable and effective and **as a minimum at least every two years.**

2. FIRST AID

2.1 FIRST AID ARRANGEMENTS

Guests as well as employees working in the Centres can suffer injuries or fall ill. It is important that the Centres' employees and guests can be given immediate attention because effective first aid can save lives and prevent minor injuries becoming major ones.

2.2 SELECTING AND TRAINING FIRST AIDERS

Depending on the country specific requirements, first aiders will be external service providers (usually the external security company providing security services in the Centres) and/or selected VIA employees working in the Centres. They will receive formal training, in accordance with current regulatory requirements. First aid personnel will be provided with retraining at regular intervals in order to ensure that their skills are maintained, and as required by applicable legislation. The Centre Director is responsible for ensuring these trainings and retraining take place and that there is always adequate cover in their area of responsibility.

2.3 FACILITIES

Centre Management Teams must ensure there is space within the Centre/offices to administer first aid and to accommodate an injured or unwell person, in accordance with local market regulations.

EQUIPMENT – AUTOMATED EXTERNAL DEFIBRILLATOR (AED)
Where required by law, Centres must ensure they have Automated External Defibrillator (AED) equipment within the Centre at strategic locations, with the amount of AED equipment dependent upon the size of the Centre and the applicable regulatory requirements. If these devices are present, the Centre will ensure that the necessary training is carried out, that the equipment is maintained and controlled at regular intervals and that only authorised users can access the equipment.

FIRST AID SUPPLIES AND MATERIALS
Each Centre must ensure there are suitable and enough first aid resources available to comply with legal requirements and suitable materials to provide essential first aid. First aid equipment provided by the Centres must be subject to a regular recorded check. A first aider or other competent person should be nominated to carry out this check. No first aid personnel are permitted to supply medication.

2.4 COMMUNICATION
First aid arrangements must be clearly communicated to Centre employees and external service providers and the arrangements must be included in the employee Health and Safety induction.

2.5 FIRST AID – RECORD OF ATTENDANCE
A written record of any incident attended by a first aider must be made. This record may be incorporated within the overall accident and incident investigation process or as an independent procedure. The information recorded must include:

- Date, time, place of incident;
- Name of injured/ill person;
- Details of the injury/illness and what first aid was given;
- What happened to the person immediately afterwards (for example continued activities, left the Centre, went to hospital etc.);
- Name and signature of first aider.

2.6 FIRST AID RECORD RETENTION
All first aid records of attendance must be retained in accordance with any relevant regulatory requirements. In case of doubt, please check with your Centre Legal Team.

3. FIRE SAFETY

VIA Outlets recognises its legal responsibilities for fire safety within its Centres. Responsibility for day to day management of fire safety within each area is with the Centre Director and Centre Operations Manager.

Responsibility for ensuring that any improvement work required to ensure fire safety is carried out or for ensuring maintenance contracts are in place to ensure fire safety, rests with the Centre Director and Centre Operations Team.

3.1 FIRE SAFETY STRATEGY
Each Centre's fire safety strategy must ensure, as a minimum, compliance with applicable regulations.

Each Centre is required to develop and maintain a suitable fire safety strategy and involve external advisors and/or regulators as appropriate. Centre Operations Teams and Centre Director are jointly responsible for ensuring this.

In developing and maintaining a fire safety strategy, each Centre will take a comprehensive and coordinated approach to ensure that fires are unlikely to occur. If fire does occur, then the Centre must be prepared and able to control or contain it effectively and safely and everyone must be able to evacuate easily and quickly to a place of safety.

Any fire strategy should include the following:

- **A comprehensive fire risk assessment** – this must be carried out and then updated with any significant change. The risk assessment must identify potential hazards, help eliminate or prevent risks and confirm the physical control measures and management arrangements required to manage residual risk exposures.
- **Adequate measures** need to be in place to ensure that the physical control measures and management arrangements are implemented and maintained in a fit-for-purpose condition and operating as intended.
- **Safety critical systems** including automatic fire detection, fire warning (alarm) and emergency lighting systems, which are under the Centre's control, must be regularly tested and maintained.
- Each Centre must maintain an **emergency plan** to help ensure an effective response to a fire. Arrangements need to be in place to test the emergency plan and procedures on a regular basis, in line with the applicable regulations.
- **Escape routes** must be prominently marked, always kept clear and accessible.
- Levels of fire protection and precautions must be proportionate for the risks posed, for example the use and storage of highly flammable substances require specific risk assessments and controls. Hot works must be managed under a permit "to work" arrangement *(see chapter IV Contractors Working in Centres – sub-section 4 below)*.
    i) Risk exposures associated with services and utilities must be identified and managed.
    ii) Clear and relevant information and instructions must be provided to VIA employees and Brand staff as to what they must do in the event of a fire.
    iii) Any VIA employees identified with additional responsibilities in the event of a fire situation must receive suitable training.
    iv) Any incidents of fire must be fully investigated to determine root cause(s) and any corrective action(s) must be implemented; and all fire incidents are to be reported as per the Centre Major Incident Management Plan and the VIA insurance Team must be informed on insurance@viaoutlets.com.

The following sections outline the specific expectations relating to the different components of the fire safety strategy as set out above.

3.2 FIRE RISK ASSESSMENT

Each Centre must carry out a fire risk assessment. The risk assessment needs to be comprehensive and carried out by a competent person. This should be done by an independent, external consultant and changes will be actioned by Centre Management and Centre Operations Teams.

The aims of the fire risk assessment are:

- To identify the fire hazards;
- To reduce the risk of any significant hazards; and
- To determine what physical control measures and management arrangements are necessary to ensure the safety of people and the protection of our Centres.

The fire risk assessment must be reviewed in the event of significant changes within the Centre (for example changes to buildings, layout or operations) and regularly renewed as otherwise required by local regulations.

3.3 AUTOMATIC FIRE DETECTION AND WARNING (ALARM) SYSTEM

Automatic fire detection provides for detection of a fire in the earliest stage of development enabling early response to and control of an emerging fire. Automatic fire detective systems operate 24 hours a day, whether the Centre is occupied or not, so this is an important safety system helping to protect both people and Centres.

A warning (alarm) system comprises manual call points, often known as 'break glass' call points, that enable any person who discovers a fire to immediately raise the alarm and warn other people in the area of the danger.

Both systems are installed throughout VIA Centres, in accordance with the applicable regulations and permits.
In relation to warning systems:

- Locations for call points must be agreed with the local fire brigade but there should at least be call points at fire exits and store exits;
- Manual call points must be kept clear of obstructions;
- A weekly test of the system must be carried out including rotational tests of call points and bell test;
- Both the automatic fire detection (smoke heads and sprinkler systems) and warning systems must communicate with a permanently manned control room.

A clear procedure to respond to an alarm activation must be in place. Such procedure must include verification of alarm condition, initiation of a zoned or full evacuation and contacting the emergency services. All VIA employees, who are required to fulfil a lead or support role in the implementation of this procedure, must be provided with suitable training, please refer to Chapter I, sub-section 3.12 regarding Fire Safety Training.

A daily visual check on control and indicating equipment (check to confirm no specific faults) must be carried out.

Servicing and preventive maintenance must be carried out in line with local country standards and/or equipment supplier guidance.

Full records of tests, servicing and maintenance must be retained by the Centre Operations Manager.

3.4 EMERGENCY ESCAPE LIGHTING

Emergency escape lighting is a safety critical system. In the event of the interruption of the electrical supply and, in turn, the failure of the lighting system in an emergency situation this may impair a safe evacuation.
Emergency lighting therefore provides an important contingent safety arrangement and the following must be established:

- Each Centre must have an automatic emergency escape lighting system in the common areas and Centre office environment that meets local country standards.
- The system must be comprehensive and must include escape routes, exit doors, emergency escape signs, windowless rooms, larger (defined) windowed rooms and stairways.
- Arrangements must be in place for any servicing and preventive maintenance requirements for the alternate power supply arrangements. A variety of alternate power supplies can be provided including, for example, rechargeable batteries, a central battery bank or an automatic start generator.
- A daily visual check of any central controls must be performed.
- All emergency escape lighting systems must be regularly tested and properly maintained in accordance with local country standards and/or equipment supplier guidance.
- Full records of tests, servicing and maintenance must be retained.

3.5 FIRE FIGHTING EQUIPMENT

Below guidance applies to the areas under the Centre's control (common areas, parking, Centre offices).

An appropriate fire extinguisher can be safely used to control and extinguish a fire in its earliest stage, helping to prevent the fire developing. Extinguishers can also be used to significantly reduce the risk to other people in the Centre by allowing people to assist others who are at potential risk.

The following must be established:

- Fire-fighting equipment to be provided per local country standards;
- Extinguishers should be suitable for the risk; for example, to deal with solid materials, flammable liquids;
- Access to fire equipment must always be maintained and training provided to members of staff;
- Visual checks of fire extinguishers in the common areas and Centre office shall be carried out on at least a monthly basis; and
- Fire-fighting equipment in the common areas and Centre office shall be serviced on at least an annual basis.

3.6 FIRE EXTINGUISHING EQUIPMENT – ACCESS

Fire equipment such as fire hoses and extinguishers are safety critical providing, first and foremost, help to ensure the safe evacuation of an area. It is therefore a requirement that equipment is positioned in an easily accessible location with suitable signage (unless clearly visible) and clear, unobstructed access to the fire extinguisher equipment is always maintained.

3.7 EMERGENCY PLAN

Each Centre must maintain a written emergency plan to help ensure an effective response to a fire or other incident requiring similar arrangements. The purpose is to ensure that if there is a fire, the Centre can be safely evacuated. The emergency plan must be based on the findings of the fire risk assessment and include coverage of:

- How people will be warned if there is a fire;
- What VIA employees and Brand staff must do if they discover a fire;
- How the evacuation must be carried out – zoned/ phased or full evacuation;
- Identification of escape routes leading directly to a place of safety;
- Location of assembly points;
- Identification of arrangements for the safe evacuation of people identified as being especially at risk, for example individuals with restricted mobility;
- Procedures for checking whether the buildings have been evacuated;
- The duties and identity of VIA employees and external service providers that have specific responsibilities if there is a fire;
- Any machines, appliances, equipment, power supplies that need to be stopped or isolated if there is a fire:
  i. Site map/plan highlighting the location of equipment, escape routes, assembly points, hydrants and any higher hazard locations (for example, highly flammable liquid storage, bulk gas storage);
  ii. How the Fire and Rescue Service and any other emergency services will be called and who is responsible for doing this; and
  iii. Arrangements in place to periodically test the emergency plan and procedures.

3.8 EMERGENCY ESCAPE ROUTES

Escape routes are designed so that people can escape quickly enough to ensure that they are not placed in any danger from fire.

In general, normally at least two escape routes must be provided but single escape routes may be acceptable in some circumstances subject to local country guidance and for example where:

- The travel distance is short; or
- A small number of people are located in that part of the Centre

The following measures must be ensured:

- Escape routes lead as directly as possible to a place of total safety;
- Exit doors on escape routes and final fire exit doors must normally open in the direction of travel and be quickly and easily operable without the need for a key;
- Fire doors are regularly inspected to ensure they are in a satisfactory condition, for example self-closer mechanisms, intumescent seals in good condition;
- Fire doors not wedged open; and
- Corridors and stairways forming part of escape routes kept clear of hazards/obstructions.

3.9 FIRE SAFETY SIGNS

In order to provide for the safety of the many thousands of people visiting the Centres every day, the Centre Management Teams need to ensure that the fire safety information is clearly communicated. Fire safety signs are a key method for helping achieve this objective and the following measures must be considered, in accordance with local market regulations:

- Escape signs directing people along the designated escape routes to the final exit to a place of safety;
- Escape signs must be pictographic including a directional arrow;
- Signs highlighting the location of fire equipment must be provided if the equipment location is not clearly visible;
- Fire doors fitted with self-closing devices must be labelled 'fire doors – keep shut'; and
- Fire action notices must be considered in the Centres' common areas and offices, stating:
    i) How to use the fire equipment; and
    ii) Action to be taken in the event of a fire.

3.10 HIGHLY FLAMMABLE SUBSTANCES – USE AND STORAGE

Highly flammable substances present an increased fire hazard. Specific precautions are required when handling and storing highly flammable substances to minimise the fire risk. Each Centre must:

- Carry out a risk assessment for the handling and storing of highly flammable substances including LPG (butane, propane and mix) cylinders;
- Where possible substitute highly flammable substances for less flammable alternatives and/or reduce quantities held to a minimum;
- Ensure that maximum storage volume restrictions are respected (subject to local country guidance).

3.11 SMOKING CONTROLS

Carelessly discarded smoking materials are a potential fire hazard. In order to reduce the potential fire inception risk, the following measures are to be applied:

- Smoking within any building is not permitted;
- Smoking is not permitted within any unit under construction or fit-out and this must be clearly communicated to all contractors and Brands;
- In the event that smoking is permitted within service yards this must be restricted to designated areas and cigarette bins must be provided away from buildings;
- Checks must be carried out to ensure compliance with smoking rules and corrective action taken where required;
- Clear signage should be installed in the areas under the Centres' control.

3.12 FIRE SAFETY TRAINING

All VIA employees must be provided with adequate fire safety training at induction to include emergency plan arrangements and an orientation to familiarise the VIA employees with escape routes and assembly point(s).

- Any VIA employee designated as having additional responsibilities in the event of a fire (for example Fire Marshall/Warden) must receive more comprehensive training so that they can effectively perform their duties including, for example, use of fire equipment, safe means of checking that buildings are clear and assisting persons to leave the Centre. Training must be repeated annually.
- Each Centre must carry out fire drills in accordance with local country requirements.
- Records must be retained of all training provided.

3.13 ACCESS FOR EMERGENCY SERVICES

In order to help the emergency services to deploy effectively:

- Emergency service vehicles including fire engines must be able to approach Centre buildings and park within a reasonable distance so that fire fighters can use their equipment without difficulty;
- Special attention must be given in ensuring that parking and storage is only permitted in designated locations and in ensuring comprehensive access for emergency service vehicles. The Centre Management Teams must be familiar with the location of hydrants within the Centre. Hydrants must be kept accessible and where applicable, clearly identified by an indicator post or similarly effective means.

4. UTILITIES AND SERVICES

Utilities and services such as electricity, water and heating systems are business critical enabling our Centres to be open for business. These services can also introduce hazards such as:

- Electricity – in the event of a malfunction, presenting a fire hazard;
- Heating – fuel supply, accelerating the development of a fire;
- Water – escape of water/flood hazard.

To manage these exposures each Centre must develop and maintain suitable risk management arrangements.

4.1 ELECTRICAL INSTALLATION

Electrical problems are a major cause of fire. However, a good standard of maintenance, as follows, can significantly reduce the risk:

- Main fixed electrical installation must be tested in accordance with local country regulations. Any improvement actions must be tracked to completion;
- Main electrical switch room(s) and electrical cupboards must not be used as a storage area and in particular the storage of combustible items;
- Switch rooms must be kept locked secure with suitable warning signs posted on the access door;
- Automatic fire detection must be installed in switch rooms;
- Periodic infra-red thermography testing of the electrical installation should be considered as good practice to identify electrical faults generating excessive heat creating a potential fire inception hazard;
- In certain markets, portable appliance testing must be carried out in line with local country regulations or otherwise implemented as a good practice measure;
- Temporary wiring is not to be used (this is because the cables can become damaged and create a fire risk) and where possible avoid the use of multi-point adapters as they can overload sockets.

4.2 WATER SUPPLY

Ensure there are readily accessible means to provide local/zoned isolation of the water supply. The method for local/zoned isolation must operate independently of the supply to the hydrant system to ensure continuity of water supply for firefighting purposes.

4.3 TEMPORARY HEATING APPLIANCES

Use of portable heating appliances must be avoided wherever possible. Faulty heating appliances can often cause fires.

If they must be used, they must be electrical convection style heaters or oil filled electric heaters (LPG fired, radiant bar or exposed naked flame heaters must not be used). Any heater used must be located at least 1 metre away from any combustible items.

5. WATER SYSTEMS AND LEGIONELLA

Legionellosis is the collective name given to the pneumonia like illness caused by legionella bacteria. This includes Legionnaires' disease – a potentially fatal form of pneumonia.

Legionella bacteria are common in natural water sources and can also contaminate and grow in purpose-built water systems such as cooling towers and evaporative condensers used to cool water in air-conditioning and hot/cold water systems.

5.1 RISK OF LEGIONELLA
There is a reasonably foreseeable legionella risk in water systems if:

- Water is stored or re-circulated as part of the system;
- The water temperature in all or some part of the system may be between 20–45˚C;
- There are deposits that can support bacterial growth, such as rust, sludge, scale and organic matter; it is possible for water droplets to be produced and, if so, that they can be dispersed.

The key point is that water systems must be designed, operated and maintained under conditions that prevent or adequately control the growth of legionella bacteria.

5.2 COMPLIANCE
Each Centre must develop and maintain arrangements for water systems under their control that comply with any relevant local country requirements and best practises.

Each Centre must develop a management approach based on risk assessment. Typically, a water system and legionella risk assessment and management system must:

- Be carried out and developed by a competent person;
- Include a Centre site-wide survey;
- Provide a description of the water system and include a schematic (lay-out) diagram (which is updated upon any new water system installation or modification) and provide an evaluation of the risk;
- Define the safe operating procedure for the water system including measures in place to control risks;
- Identify any additional measures required to control the risk and that any actions are tracked to completion; and
- Clearly define the inspection, monitoring and maintenance checks required and organise a programmed schedule.

Brands are responsible for water systems within their leased premises (e.g. water in kitchenette and bathroom area).

5.3 RECORDS
The Centre Operations Team shall ensure that records for inspection, monitoring and maintenance are retained in accordance with local country guidance.

6. COVID-19 – GUIDELINES, POLICIES AND PROCEDURES

During 2020, communities around the world were hit hard with COVID-19 pandemic, which brought along many restrictions directly impacting on our business and that of our Brand partners. Throughout this time, we prepared various materials to protect the safety of our guests, Brand Partners and employees and to restore our operations as quickly as possible.

VIA's priorities are always:

i. The health, safety and security of our teams, store staff and guests.
ii. Ensuring the continuous operation of the Outlet Centres.
iii. Supporting our Brand Partners.

The below links share information and provide you the guidance, template scripts and documents that have been developed to operate during these unprecedented times.

- COVID-19 Guidelines
- COVID-19 Toolbox talks
- Brand guidance/Centre closure and re-opening information
- Business Continuity plans
- COVID-19 Risk assessments

7. ACCIDENT AND INCIDENT INVESTIGATION AND REPORTING

This section covers how to deal with incidents in any of the VIA Centres. **NOTE:** For the purposes of these Rules, all three events below will be referred to as an 'incident'.

- **Accident:** An event that results in injury or ill-health;
- **Property Incident:** An incident such as a fire or a vehicle collision with part of a building or other structure (gate, fence, skip in the yard etc.);
- **Near Miss:** An event that, while not causing harm or property damage, had the potential to cause injury, ill-health or property damage (for example a tool or material falling from height during roof work did not actually hit anybody or cause damage but could have foreseeably done so).

The approach to incident investigation and reporting is a four-step process:

- **Step 1** Incident Response
- **Step 2** Investigation
- **Step 3** Reporting and Review
- **Step 4** Records

7.1 INCIDENT RESPONSE

Each Centre has a Centre Major Incident Management Plan to alert the Centre Management team (and any other persons/ bodies as required by law) of a significant event such as an injured party requiring hospital treatment or a fire. This Centre Major Incident Management Plan is stored in the Compliance Area in VIAShare. It is essential that you preserve life and prevent injuries and inform the necessary people as per the Centre Major Incident Management Plan.

In this regard please note the following:

- To assess the situation – VIA employees must not put themselves in danger;
- If serious, the emergency services must be called immediately;
- Make the area safe and take prompt action to provide an appropriate level of first aid.

ALL LEVEL INCIDENTS MUST BE ESCALATED IMMEDIATELY TO VIA INSURANCE via insurance@viaoutlets.com

ALL LEVEL 1 AND LEVEL 2 INCIDENTS MUST BE ESCALATED IMMEDIATELY TO THE REGIONAL BUSINESS DIRECTOR

7.2 INVESTIGATION

Dealing effectively with an accident investigation requires a methodical, structured approach to information gathering and analysis to understand what happened with a view, where reasonably practicable, to preventing the accident or incident from happening again.
A structured, objective investigation is required to establish the facts. Each Centre is required to implement a comprehensive investigation procedure that gathers information from several sources to understand what happened with a view to preventing, where reasonably practicable, a similar incident happening again. The Centre investigation process must cover:

- **Physical Conditions:** Information gathering regarding conditions at the scene of the accident.
- **Verbal Accounts:** Accounts received from the injured party and any witness(es).
- **Written Information:** Written information such as risk assessment, method statement, training records and inspection checks for example.

A similar process for investigation needs to be followed for every accident and incident.
After having gathered the information the next step in the Centre procedure must be the identification of any risk control measures that were:

- Missing;
- Not followed, communicated or understood;
- Inadequate, and
- Identify any additional measures that may be required to strengthen control arrangements.

7.3 REPORTING AND REVIEW

Any incident must be recorded through VIA's standard Incident Report, which is available in VIAShare. If required by law, an incident must be reported to the relevant authority (and in any case, also to the VIA Insurance Team at Insurance@viaoutlets.com).
Incidents must be reviewed to capture any learning opportunities and develop corrective and or improvement actions.

The Centre Management Team must review incidents, lessons learned and agree and implement corrective and improvement actions. Any corrective or improvement actions must be tracked to implementation.

7.4 RECORDS

All incident records must be retained in accordance with any relevant regulatory requirements including the relevant statute of limitation for personal injury (when in doubt, check with your Centre Legal Manager).

8. HEALTH AND SAFETY TRAINING

VIA Outlets is committed to ensuring that suitable Health and Safety instructions, information and training is provided for all VIA Outlets employees.

VIA Outlets has people fulfilling a wide range of roles and inevitably their safety training needs to vary considerably, but those needs can be broadly classified into the following requirements.

It must be ensured that VIA employees can work safely and without risk to their Health and Safety at VIA Outlets. This will enable each Centre to meet its legal obligations but also develop a positive approach to managing and working safely.

Each Centre must ensure that suitable training arrangements are in place that include the following:

- There must be a process in place to identify the skills and knowledge needed for employees to do their job in a safe and effective way (safety training needs analysis);
- Risk assessments must assist and inform the analysis of training needs by identifying training requirements that are associated with specific risks and control measures;
- Any training requirements are organised, scheduled and delivered in a timely manner to ensure legal obligations are met;
- Suitable checks must be made to ensure that training has been effective, and people are working in accordance with the training provided;
- Training may need to be refreshed at suitable intervals to ensure employees remain competent. Ensure certifications do not lapse;
- Safety training needs must be considered when individuals change roles and where there are new Health and Safety requirements, or implications associated with the role change;
- Where relevant, training must be provided in the event of a change of work system and or new equipment;
- As part of an accident, incident and near miss investigation consider, where relevant, any additional or refresh training needs to help prevent a recurrence of a similar incident;
- Sufficient resources must be made available to ensure the effective delivery of general induction, specific knowledge and skills development and refresh training. Centre Management Teams must maintain suitable monitoring arrangements to ensure safety training is delivered on a timely basis;
- Records must be retained of all safety training provided. Safety training records must be kept for ex- employees for a sufficient period of time to satisfy local country requirements and or to meet any workplace compensation, administrative or litigation needs.

8.1 HEALTH AND SAFETY – INDUCTION TRAINING

All employees must be given basic Health and Safety information about their workplace. This will help to ensure that new employees can work safely and without risks to health, can understand the emergency procedures and can take

appropriate action when required.

General safety induction training must comply with local country regulations and must include:

- Arrangements for obtaining first aid assistance;
- Fire precautions and procedures including:
  I. The fire escape routes and exits in the work area(s);
  II. How to raise the alarm including location of warning alarms (break glass points);
  III. Fire assembly point(s);
  IV. Accident, incident and near miss reporting;
  V. Generally applicable safety expectations and rules (for example smoking restrictions);
  VI. Informing any new starter of VIA's Health and Safety Rules and associated, relevant documentation.

The general safety induction must be carried out at such time as required by law, such as on day one, and in any event must be completed within the first week.

8.2 TASK SPECIFIC SAFETY INDUCTION TRAINING
Relevant task specific safety induction training will need to be organised and scheduled in line with the particular operational and safety requirements of the new starter's role. This may include, for example:

- A workstation (DSE - display screen equipment) assessment for those likely to make significant use of a computer;
- A structured and consistent training programme for roles with more extensive safety training requirements (for example safe working procedures such as manual handling, work at height etc.);
- Any new starter with prior relevant safety related training that is either in part or in full being relied upon in their role with VIA Outlets must provide evidence of certifications or other similar evidence and a record must be retained by the Centre Management Team.

The induction training will be delivered and taken online. This training will be launched in Q1 2021.

9. SLIPS, TRIPS AND FALLS

Slips, trips and falls represent a significant potential exposure for VIA Outlets as the Centres welcome large numbers of guests. High levels of footfall can combine with a range of factors to increase the potential for an accident including:

- Adverse weather (such as rain or ice);
- Spills (such as food or liquids); and
- Damaged floor surfaces and pathways or movement in areas under construction or renovation.

Slip, trip and fall accidents must not be considered inevitable. Centres must take a comprehensive approach to risk identification and then implement control measures to minimise the potential for slip, trip and fall accidents.

9.1 RISK ASSESSMENT
Each Centre must carry out a written risk assessment to assess slip, trip and fall hazards in common areas. This will identify the specific potential hazards at each Centre and determine the appropriate controls. This must include assessment of:

- Trip hazards;
- Slip hazards;
- Spills; and
- Falls from height.

9.2 SLIP PREVENTION
The following slip prevention arrangements must be implemented and maintained:

SLIP HAZARD IDENTIFICATION
People rarely slip on clean, dry floors. Floors must be maintained in a clean and dry condition and any spillages dealt with promptly on discovery.

Slips can typically arise where an individual may slip on an item of food or liquid spilled on the floor. Specific locations presenting an increased risk potential must be identified by risk assessment. Increased levels of observation, monitoring and cleaning must be considered at these locations.

IMPLEMENTING PREVENTION AND CONTROL MEASURES
A spill response procedure is required for handling spillages in public areas. As a minimum standard if there is a risk of a slip, trip or fall in public areas, the team member that discovers the issue must remain by the spill/ to keep persons away from the area until it is cleaned or otherwise suitably secured/made safe.

All relevant personnel including Operations, Security and Cleaning team members must be familiar with the spill procedure.

CLEANING OPERATIONS – RISK ASSESSMENT
Risk assessments are required for all cleaning operations including the cleaning of the guest bathrooms. Risk assessments must be Centre specific and reflect our environment, standards and expectations for housekeeping.

TRIP AND FALL PREVENTION
Trips are often caused by uneven surfaces. In order to minimise the potential for trip hazards, floors and surfaces must be regularly inspected and maintained in a satisfactory condition so to avoid obstructions and maintain good housekeeping standards.

TRIP AND FALL PREVENTION PLAN
Each Centre will develop and maintain a written Trip and Fall Prevention Plan and procedures. Whilst the precise scope of the Plan is to be defined by each Centre, it will always include the entire Centre common areas, including any common footpaths and hard surfaces which the Centre is responsible for and intended to be accessible and used by guests.

The plan will clearly identify arrangements for inspecting and maintaining the Centre and any other common areas defined as being within scope (such as over-flow car parks).

9.3 INSPECTION FREQUENCY
A programme for the regular inspection of the Centres and any other common areas defined as being within scope will be maintained. The frequency of inspections will be specified and may vary across the Centre reflecting footfall, location, surface materials and likely exposure to damage or deterioration for example. These checks will be carried out by the Centre Operations Team or Security Teams.

9.4 CARRYING OUT AND RECORDING INSPECTIONS
Inspections are to be recorded. Information recorded will include a note of the areas inspected, observed conditions and any action(s) required.

9.5 REPAIRS
The Trip and Fall Prevention Plan must include the “make-safe and repair” procedure.

9.6 RETENTION OF RECORDS
Inspection records will be retained electronically and held for the period corresponding to the country specific statute of limitations for a claim based on personal injury.

10. ADVERSE WEATHER

Adverse weather conditions could include heavy rainfall and flash flooding, storms and strong winds, ice and snow or extreme temperatures (whether hot or cold). Depending on the location of the Centre these weather conditions may be a seasonal expectation or extremely rare. Adverse weather can create new risks such as:

- Increased potential for slips, trips and falls through rainwater, ice or snow or movements in paving in high temperatures;
- The potential to be struck by objects in high winds;
- Dehydration due to high temperatures.

In order to ensure the safety of all Centre guests and staff, each Centre must maintain an adverse weather procedure. Please consult the Adverse Weather Guidelines. In the event of an incident occurring due to adverse weather conditions, ensure that this is reported to the VIA insurance team on insurance@viaoutlets.com. Please refer to the incident response section in Chapter I, sub-section 7.1.

10.1 ADVERSE WEATHER RISK ASSESSMENT

A written risk assessment must be carried out to identify the likely adverse weather conditions and the control measures required across the Centre. The risk assessment must also consider areas of the Centre with a potentially increased exposure, such as lower lying parts of the Centre prone to flooding, areas with poor drainage or slip risk on external flights of steps.

ADVERSE WEATHER SAFETY PROCEDURE

The adverse weather procedure must include a framework to define "alert and response status" conditions and thresholds to ensure a consistent and objective organisational response to adverse weather.

This may follow, for example, regional or national government weather warning classifications such as

- No severe weather;
- Be aware;
- Be prepared; take action,

which can cover rain, snow, wind and ice and extreme heat.

10.2 ESCALATION PROCEDURE TO SEEK APPROVAL FOR CENTRE CLOSURE

Please consult the Centre Major Incident Management Plan which includes the escalation protocol. Centre closure can only be decided with consultation and approval of the Regional Business Director.

11. PEAK DAYS.

The Centres can be very busy environments and particularly so for special events and other peak visitor days. These successful days can bring many thousands of visitors whose experience of visiting the Centre environment must be enjoyable and safe.

Higher visitor numbers can potentially increase safety risk exposures, such as:

- The potential for slip accidents (such as spillages) cannot be detected as easily;
- The risk of colliding and/or falling over structures that are not easily visible in a very busy Centre; and
- Increased vehicle and pedestrian traffic movements in potentially congested areas.

These safety considerations can be successfully addressed through:

- Good planning, by anticipating the likely number of visitors and means of transportation;
- Taking measures to accommodate the increased number of visitors which are anticipated;

- Ensuring sufficient hospitality and services personnel are deployed; and
- Exercising vigilance and flexibility throughout the trading day so that proportionate and effective arrangements are maintained to ensure our visitors have a safe and enjoyable visit.

11.1 VISITOR NUMBERS – PREPAREDNESS

A forecast for anticipated visitor numbers must be produced and circulated, highlighting any peak/high visitor number days in order to ensure resource scheduling and other arrangements can be organised in sufficient time.

Centres must develop and maintain arrangements for determining visitor number thresholds (for example 10,000–15,000 visitors, 15,001–20,000 visitors, 20,000+ visitors etc.) that will trigger:

- Any specific arrangements (for example opening and manning of additional car parking capacity); and
- The number of VIA employees (specific roles and numbers) required to be deployed on the day.

11.2 OPERATIONAL MANAGEMENT

Suitable safety arrangements must be organised and in place to successfully manage peak visitor numbers including:

11.2.1 RISK ASSESSMENT

As part of the planning for and the effective management of arrangements for peak visitor days, carry out a written risk assessment to identify any areas of potentially significantly increased hazard from normal operations or any new hazards introduced. Centres must ensure relevant control measures are implemented.

Ensure relevant parties (for example contracted service providers) are briefed in advance and any additional measures, amended work practices and or schedules are clearly communicated and understood.

Identify any scheduled contractor, service and maintenance activity (grounds maintenance work for example) that is routine and reschedule to a non-peak visitor day.

Any additional personnel required to support peak trading days must have received a full safety induction prior to starting work and work in accordance with safe working procedures.

Consider removing from the Centre any non-essential displays and fixtures that may otherwise present a hazard in a congested Centre environment.

Test any communication systems that may be required (for example a PA system) before the start of trading.

Ensure directional signage is clearly displayed to inform visitors of additional parking.

Consider any requirement for queue management systems particularly with any locations anticipated to be particularly popular throughout the day or busy at certain times of the day (Brands, food and beverage locations, Tourist Information Centres and Bus Stops, for example).

Consider increasing cleaning patrols particularly near food and beverage operations in the Centre.

11.2.2 MONITORING AND RESPONSE

Ensure arrangements are in place for regularly monitoring conditions throughout the day. A communications and escalation process must be in place, so that employees can be swiftly deployed, for example to assist in locations experiencing high levels of congestion.

11.2.3 AFTER ACTION REVIEW

Conduct a review of hospitality, operations, retail, marketing and service arrangements to capture good practices and learning opportunities to feed forward into future events.

12 EVENT MANAGEMENT

Events across the Centres are many and varied and can play an important role in promoting interest in the Centre.

"Events" can include, for example, displays, performances, exhibitions and so forth. Events may be for one day only or substantially longer periods of time but, regardless of duration, all Events need to be well organised and suitable for Centre environments.

This section applies to Events in the common areas, not Brand Events in the stores. Events in the stores are the responsibility of the Brand.

Where either the Centre or a Brand organises an event, they must fill out and complete the Event Notification Form and follow the Event flow chart.

If a Brand wishes to run an Event in the common areas then, before permission is granted, the Brand must evidence to the Centre Management Team that it has undertaken the necessary requirements as per the Event Notification Form.

CONTRACTUAL PROVISIONS
The contract to engage any Event contractor must contain appropriate provisions regarding allocation of liability, indemnification, insurance and the requirements of this section more generally. Please engage with your Centre Legal Team to make sure the appropriate contract is agreed.

CENTRE SAFETY RULES AND ARRANGEMENTS
The Event contractor must be provided with the Centre safety rules and the Event contractor staff working in the Centre must be provided with a safety induction including emergency arrangements. During the Event any safety related issues must be co-ordinated through the appointed Centre representative.

RISK ASSESSMENT
A written risk assessment must be carried out in advance of every Event.

13 PLAY AREAS

Play areas must be maintained in a suitable condition so the equipment and environment can be safely enjoyed.

Accidents can typically be caused by misuse of equipment or lack of parental or guardian supervision. Other reasons that are often cited as causes of play area accidents that are directly related to Centre responsibilities include:

- Poor design and layout;
- Incorrect installation;
- Unsuitable equipment for the intended age group;
- Poor housekeeping standards;
- Damaged equipment;
- No or inadequate inspections delaying a repair/ response.

13.1 SIGNAGE
Suitable sign(s) must be prominently displayed including any age limitations and other management requirements such as ***"no glass in the play area"***, ***"the area is unsupervised"*** and ***"children must be supervised at all times".***

13.2 FENCING
Where appropriate, to help define and contain the play area, suitable fences and gates (for example, 1 metre height) or other method to define the perimeter or boundary must be used as appropriate to the risk assessment.

13.3 INSPECTION AND MAINTENANCE OF PLAY AREA
Regular inspections of the play area must be carried out, as follows:

- Daily visual check; including regular attendance by any mobile cleaning team;
- Weekly inspection by person who has received training in identifying faults or hazards;
- Periodic inspection by a specialist in accordance with any manufacturer, designer or local country guidance; and
- A written risk assessment must be carried out and reviewed annually and in accordance with local country guidance.

In the event of equipment damage, the play item must be removed or suitably signed as 'not in use' and measures taken to prevent access to the damaged equipment/item. Faults must be repaired quickly.

13.4 RECORDS
Inspection and maintenance records must be retained in line with the applicable statute of limitation for personal injury (children) timescales. When in doubt, please check with your Centre Legal Manager.

14 SERVICE YARDS/BACK OF HOUSE AREAS

Service yards need to be managed and maintained so that all persons permitted to use the service yards and back of house areas can do so safely.

A range of risks are associated with service yards including, by way of example:

- Large commercial vehicles using yards – restricted space, excessive speed;
- High voltage switch rooms;
- Pedestrians using yards in proximity to vehicle movements;
- Storage obstructing footpaths;
- Hazardous substances – storage of gases, etc;
- Waste – combustible items stored adjacent to buildings (possible fire development risk); and
- Smoking – fire inception hazard.

In what can be very busy environments, managing these risks and other associated risks requires:

- Implementation of measures to ensure insurance and legal compliance;
- Development of clear, consistent good practice standards;
- Maintaining excellent housekeeping arrangements.

14.1 RISK ASSESSMENTS
Each Centre must carry out written risk assessments of all service yards. Specific risk assessments will be required for each service yard to fully reflect different lay-outs, activities and use of yard areas. Risk assessments should consider vehicle and pedestrian users and be informed, where appropriate, by information described in chapter I – sub-section 18 "Traffic Management".

14.2 INSPECTING SERVICE YARDS
A clear process needs to be maintained for carrying out regular inspections to ensure standards are maintained.

14.3 CORRECTIVE ACTIONS, FOLLOW-UP AND ESCALATION
Procedures must be maintained for recording and tracking corrective actions to satisfactory completion including:

- Standard method for communicating corrective action requests to Brands;
- Follow up to ensure corrective actions are completed; and
- Escalation process in the event of failure to take the required corrective action or in the event of regular contravention of operating and housekeeping standards.

15 SAFETY SIGNS

Safety signs fulfil an important role in providing information and instructions about Health and Safety. This information can help people understand where to go in the event of a fire or other emergency, what is permissible such as any speed limits and what needs to be done such as using specialist protective equipment.

15.1 SAFETY SIGNS STANDARD

It is important to be consistent in how safety information is displayed within the Centre. For instance, every fire escape route sign must be consistently signed where possible.

Within the European Union, safety sign requirements are standardised through EC Directive 92/58/EEC. International Standard 'ISO 7010 Safety Signs' provides further harmonisation across Europe. Therefore, the Centres will, over time, be able to follow consistent signage protocols and must in any event be compliant with local country regulation.

15.2 SIGNS – LOCATION AND PRESENTATION

Standardised pictogram communication is particularly useful for the Centre environments given the international profile of VIA guests.

The location of signs must be in accordance with local country guidance and, in the absence of such guidance, consider:

- Safety notices on walls must be mounted 1,700– 2,000 mm above the floor;
- Where a crowd may temporarily obscure a sign, it must be placed at a height of not less than 2,000 mm;
- When a directional or information sign is suspended over a pedestrian area there must preferably be 2,300 mm clear space below the bottom edge of the sign and the ground;
- Fire exit signs must be illuminated; and
- Signs must be securely fixed, kept clean and not be otherwise obstructed.

16 WASTE – SERVICE YARD AREAS

Centre activities, for Brands, third-party providers and Centre teams, generate significant quantities of waste that, if not managed effectively, can present a number of hazards, primarily in service yards, including:

- Vermin;
- Slip, trip and fall hazards from discarded or poorly stored waste;
- Waste generated from Centre activities is often combustible and provides fuel for an ignition source (for example a carelessly discarded cigarette that can develop into a large fire);
- Unsafe use of compactor equipment.

Further details regarding waste, recycling and service yard usage are included in the Tenant Handbook for every VIA Centre.

16.1 GENERAL HOUSEKEEPING

In order to manage the slip, trip, fall and fire risks:

- Any waste awaiting removal for processing or disposal must be located in a designated and approved area (being at least a minimum of one metre from the exterior of buildings and preferably there must be a 10 metre separation from buildings where possible) and stored in a designated area so as not to prevent a slip or trip hazard; and
- Volumes of combustible waste must be kept to a minimum to reduce the fire load.

16.2 COMPACTOR

A compactor fulfils a very useful purpose by reducing waste volumes. However, there is, in commercial operations, a history of accidents with compactors and particularly from machinery risks and container/skip activities. Each Centre must ensure that a suitable written risk assessment is carried out and maintained including consideration of:

- Compactor location – including pedestrian and vehicular access (skip delivery and removal);
- Environmental factors – lighting and ground surface;
- Information from the compactor's manufacturer and/or supplier on safe use/operation; and
- Skip/bin exchange.

Written safe operating procedures are provided, operators trained and authorised with written records retained.

There must be a clear written safe working procedure for dealing with any blockages (all relevant personnel trained in the procedure). The compactor must be secured to prevent unauthorised use and must be serviced and maintained in line with manufacturer guidance.

17 VISUAL MERCHANDISING

It is recognised that the Visual Merchandising (VM) employees can be involved in a wide range of activities that promote the Centre and enhance the guest experience. More generally it is recognised that VM employees may assist Brands in optimising merchandise presentation and display. These activities may, on occasion, involve team members engaging in potentially high hazard tasks such as working at height.

17.1 VISUAL MERCHANDISING RISK ASSESSMENT

In order to ensure the likely range of activities involving VM employees can be carried out safely, a written risk assessment of the range of activities must be carried out. This risk assessment must identify the hazards and the control measures required to eliminate, prevent or minimise the risks.

17.2 VISUAL MERCHANDISING TRAINING

In order to ensure that VM employees are able to work safely, any training should be identified through the risk assessment process.

Specifically, VM employees involved in handling, lifting and working off the floor must be provided with relevant training (manual handling/working at height).

Training must be provided at induction and periodically refreshed (as a minimum every three years).

18 TRAFFIC MANAGEMENT

The Centres can experience thousands of vehicle movements every day. A wide variety of vehicles will visit, including private cars, commercial vehicles and large passenger vehicles such as buses and coaches. Hazards tend to be those typically associated with general road, service yard and car park use and require that a structured approach is taken to traffic management in order to ensure access and circulation around each Centre is easy and safe.

These Rules address general expectations for traffic management. More specific direction for:

- Vehicle – pedestrian safety; and
- Shuttle bus service.

18.1 TRAFFIC MANAGEMENT RISK ASSESSMENT

A comprehensive written risk assessment must be carried out and then updated following any significant change. The risk assessment must identify potential hazards, help eliminate or prevent risks and confirm physical, organisational and operational arrangements required to manage residual risk exposures. The risk assessment must help inform the traffic management plan.

18.2 TRAFFIC MANAGEMENT PLAN

Each Centre is required to develop a written traffic management plan that considers and addresses as appropriate the following:

- Road, service yard and car park surfaces need to be maintained in a reasonable condition. A process for recorded

periodic inspection and repair is required;

- Road, service yard and car park surface markings are likely to deteriorate over time and need to be maintained so that all markings remain clearly visible;
- Road signs need to be clearly visible and any shrub and tree growth that may obscure signs must be regularly cut back where necessary;
- Any speed limits must be clearly indicated through signage and speed bumps or other suitable means considered to help reduce vehicle speed in car parks;
- Measures must be in place to prevent and deal with any unauthorised parking in locations that present a hazard to other road users or pedestrians;
- Dedicated coach parking must be provided, preferably of the drive-through design, and where not possible, reverse parking arrangements must be considered;
- Car park operations activities must have Centre- specific risk assessments;
- Persons deployed as car park operators must be suitably trained and training records must be available;
- Sufficient trained personnel must be deployed to meet the expected traffic profile (timings, peak flows, special events);
- General car parking areas, including temporary/ overflow parking, must:
  i. Be well lit, have firm, level and well drained surfaces;
  ii. Ensure that, where practicable, pedestrians and vehicles are kept apart and allow drivers and pedestrians to have clear lines of sight; adequate access for emergency service vehicles must be maintained at all times.

18.3 VEHICLES AND PEDESTRIANS – GENERAL CIRCULATION AND CAR PARK AREAS

Good design and maintenance will allow pedestrians and vehicles to access the Centres and use the car parks and service yards safely. Car parks and circulation routes must be simple and clear to understand to assist drivers and pedestrians. In order to support safe general circulation for pedestrians the following must be considered:

- Dedicated footpaths must be available where possible around the Centre and separated from vehicle routes by raised kerbs. Footpaths must be kept clear of obstructions;
- Where a segregated path is not practicable consider surface markings to provide a designated pedestrian walkway;
- Directional signage must be provided;
- General circulation routes must be designed to meet local country access guidelines;
- Suitable pedestrian crossings must be provided where appropriate;
- Crossing points must be designed per local country standards and conventions. Design specification must consider:
  i. Adequate lighting;
  ii. Measures to encourage pedestrians flow to dedicated crossing points (for example, installations, fixtures or other means to eliminate short-cuts that may represent an increased hazard); and
  iii. Any large vehicles that have to reverse in locations where pedestrians may be in the vicinity must be supervised by suitably trained persons.

As regards car park areas, the Centre Management Team must ensure that:

- Lighting is adequate;
- Where possible pedestrian routes must be segregated from vehicle routes and or otherwise clearly defined;
- Vehicle speed controls must be considered including signing and self-enforcing measures such as speed humps where appropriate;
- Ensure there are no structures that obstruct lines of site for drivers and pedestrians. Ensure trees and shrubs are maintained so that visibility for safety purposes is not impaired;
- Any person working in car parks must wear high visibility clothing and safety footwear.
- Car park and footpath surfaces must be maintained in reasonable condition and subject to periodic inspection and repair.

18.4 SHUTTLE BUS SERVICE

Shuttle bus transportation to the Centres can be very popular and it is important that the service provides a timely and reliable service. The shuttle service can attract large numbers of people at peak times and the safety of service users' needs to be planned for and managed.

The following must be considered:

- The bus stop must be designed and maintained to allow passengers to get on and off safely and conveniently:
- The bus stop must have a dedicated lay-by or other parking provision where this would help improve general traffic flow;
- Any parking provision must be of sufficient dimension for both the anticipated vehicle size and the number of vehicles;
- Preferably be designed to allow the bus to line up adjacent to and parallel with the kerb;
- The bus stop area must be monitored to prevent and deal with any unauthorised parking;
- Footpath and waiting area to be of sufficient size to safely accommodate peak numbers of service users. Consider the need for any roadside safety guardrails to provide a physical separation between pedestrians and vehicles;
- Sufficient litterbins are provided to reduce the slip and trip hazard from discarded waste/litter;
- Support minimum passenger waiting times by clearly communicating the bus schedule.

19 LANDSCAPING

Well maintained landscaping can considerably enhance a Centre environment. The landscaping environment presents a low risk if suitably designed and maintained. Each Centre must ensure the following risk management measures are in place:

- A written annual grounds maintenance programme must be developed including regular and seasonal work schedules.
- Contractor Risk Assessment
- Grounds maintenance activities must have Centre-specific risk assessments and method statements. Contractors must be suitably trained, and training records must be maintained.
- Trees Risk Management: If trees overhang a pedestrian route the branches must be no lower than 2,300 mm from the ground and any branches or bushes that may encroach onto the footway or restrict the use of handrails on steps or ramps must be kept cut back so as to ensure safe access and use;
- Trees must be periodically inspected (including checking after strong winds).

19.1 WATER SAFETY

Any water courses must be risk assessed to determine appropriate warning notices, controls and any rescue equipment required.

19.2 EXCAVATIONS

Any soft landscaping design (or other) work that requires digging must be planned and managed to avoid potential danger from any underground services and where appropriate subject to a permit to work.

20 HEATING, VENTILATING AND AIR CONDITIONING (HVAC)

Heating, ventilating and air conditioning (HVAC) systems provide thermal comfort and acceptable air quality. An efficient and effective HVAC system is important to ensure staff/guest comfort and must be regarded as a critical building services system that needs to be appropriately maintained. This section only applies to areas under Centre control.

There are safety considerations associated with HVAC systems and two of the considerations are dealt with more specifically as follows:

- The prevention and control of legionella in air conditioning systems is addressed in chapter I – Operational Management of the VIA Centres, sub-section 5 above “Water Systems and Legionella”;
- Expectations for heating systems under Fire Safety.

20.1 INSTRUCTION AND TRAINING
An operational and maintenance manual must be available at the Centre. Any Centre employee with responsibilities for managing the HVAC systems must be provided with suitable training and instruction.

20.2 STATUTORY INSPECTION
Applicable national statutory inspection and test requirements must be fully complied with.

20.3 MAINTENANCE AND SERVICE
The maintenance manual must include a detailed maintenance schedule listing the various checks and service inspections required including the applicable time intervals/schedules.

All servicing and maintenance work must be carried out by a competent person.

20.4 RECORDS
Ensure records for inspection, servicing and maintenance are retained in accordance with country specific guidance (or for manufacturer warranty purposes) and, in the absence of such guidance, be kept for a minimum of ten years by the Centre Operations Team.

21. GENERAL MAINTENANCE CHECKS

In order to ensure that the Centres are presented and maintained to industry standards, each Centre must develop and operate a suitable and comprehensive maintenance programme. Effective preventive maintenance and responsive repair programmes will best ensure our Centres remain safe, fit-for-purpose and able to meet our trading commitments.

21.1 CENTRE MAINTENANCE ARRANGEMENTS
Each Centre must maintain a comprehensive set of maintenance arrangements that likely comprise a range of activities including:

21.1.2 STATUTORY/REGULATORY TESTS
Statutory and regulatory tests may typically include equipment where failure would be safety-critical, for example, lifts, hoists, boilers and air receivers. Any corrective actions from the inspection and tests must be tracked to completion. Full written inspection and test records are to be kept in accordance with local market requirements.

21.1.3 PLANNED PREVENTIVE MAINTENANCE TO MEET STATUTORY AND/OR MANUFACTURER’S GUIDANCE
A written programme covering a 12-month fixed or rolling cycle of maintenance and servicing must be available. The 12-month plan must be complemented by a longer-term preventive cycle database (for example: 3, 5, 10 years etc.). Any corrective actions must be tracked to completion.

Ensure records for inspection, servicing and maintenance are retained in accordance with local country guidance and, in the absence of such guidance, they must be kept for a minimum of ten years.

21.1.4 REACTIVE MAINTENANCE AND REPAIR
Each Centre must ensure there are comprehensive arrangements for reactive maintenance and repair arrangements are in place. A prioritised and consistent approach for the classification of repairs together with assigned target timescales for completion must be implemented.

This must have clear priority for Health and Safety, security and/or business critical repairs, for example:

- **Priority 1 (Emergency)** Significant Health and Safety or security risk or repairs required from an insurance point of view;
- **Priority 2 (Urgent)** Faults that may cause operational problems if not attended to quickly;

- **Priority 3 (Routine)** Other faults that do not present an immediate problem.

Arrangements must be made to secure and made safe when required and particularly in relation to "Priority 1" items, for example putting a cordon/barrier in place and/or isolating the risk.

Contractors must be pre-approved to facilitate an emergency response (24 hours/7 days) to respond to safety and operationally critical repairs.

Reactive maintenance and repair arrangements must be monitored to ensure timescales (for example "Priorities 1– Priorities 3") are being regularly achieved.

21.2 PERIODIC SCHEDULED VISUAL CHECKS
These arrangements must be developed and managed to provide a proactive visual check to make sure structures, equipment and other items remain in acceptable condition and check for any possible faults or hazards. Centre Operations Teams must receive training to be able to carry out allocated visual checks.

Periodic visual checks must be recorded. A full written schedule of periodic checks must be available and monitored by the Centre Operations Team to ensure checks are being carried out satisfactorily.

21.3 DAILY OPENING, CLOSING AND 'THROUGH-THE-DAY' CHECKS
As part of the daily Centre opening and closing procedures, relevant arrangements, conditions and risk control measures must be checked to ensure the Centre is safe and ready for business and then, through the day, any emergent issues are identified and addressed.

Relevant personnel (for example VIA employees likely to be working in the Centre and Contracted Service Providers' personnel - CSP) must receive training on likely/common faults and hazards and the action to be taken to ensure a swift and effective response. VIA employees and CSP personnel must be trained separately.

II. VIA OFFICE ENVIRONMENT

1. SAFE WORKING ENVIRONMENT

VIA Outlets will do all that is reasonably practicable to ensure that the workplaces of those who work for VIA Outlets meet suitable health, safety and welfare needs. Such a workplace could be, for example, an office, a service yard and working from home.

1.1 RISK ASSESSMENT
Risk assessments are an important tool to help manage Health and Safety exposures. Centres will develop and maintain an effective risk assessment process that applies equally to both the development of safe working procedures and to the design, installation and maintenance of a safe working environment.

1.2 HOME WORKING
Please consult the local Home Working Policy or speak with VIA HR Team.

1.3 LEGAL COMPLIANCE – WORKPLACE ARRANGEMENTS
The Centres must comply with applicable regulation(s) and must in any event ensure as a minimum that arrangements are in place for the following:

- Effective means to ensure the temperature of colleagues at the workplace (whether indoors or outdoors) is reasonably comfortable throughout the year;
- Lighting that is suitable and sufficient including:
    i. Stairs, steps and other changes in level (for example ramps) must be well lit;
    ii. Work areas must be illuminated sufficiently for the requirements of the task(s);
    iii. External circulation routes used by pedestrians must be provided with adequate lighting; and
    iv. Emergency lighting is powered by a source independent from normal lighting;

- Workrooms must have enough free space to allow people easy access to and from workstations, to move around the workroom safely and not restrict or otherwise constrain movement whilst performing work;
- Workstations must be organised so that tasks can be carried out safely and comfortably including, where appropriate, suitable seating;
- Floor surfaces and pedestrian routes must be kept in a reasonable condition and free from any holes, unevenness or slippery surface likely to cause:
    i. a person to slip, trip or fall;
    ii. kept free of obstructions that may present a hazard for example trailing cables;
    iii. kept dry and clean and in the event of a spill.
    iv. provided with suitable stairs, ramps and handrails, as appropriate.
    v. windows, translucent doors and walls must be marked where necessary to make them apparent (by glass manifestation/highlighting) so as to minimise the risk of people walking into and colliding with the structure;
    vi. suitable bathroom facilities must be provided;
    vii. each Centre must be organised in a way that pedestrians and vehicles can circulate safely; and where appropriate, reasonable adjustments are made for people with disabilities in the workplace. Applicable guidance should be followed.

1.4 INSPECTION OF THE WORKPLACE

The workplace must be subject to periodic inspections to ensure arrangements and conditions remain satisfactory. Inspections must be recorded. Any corrective or improvement actions must be tracked to completion.

Suitable arrangements must be in place for the inspection, maintenance and servicing of the office building structures, fixtures, fittings, plant and equipment in accordance with local country requirement, relevant regulation(s) and manufacturers' or suppliers' information and instructions.

III. HEALTH AND SAFETY ISSUES IDENTIFIED IN STORES

As stated in the lease agreements with Brands, Brands are responsible for managing Health and Safety within the stores. To ensure that there is clarity that the Brands remain responsible for managing Health and Safety within stores, it is important that if VIA becomes aware of Health and Safety issues inside a store, there is a process for formally communicating such issues to Brands or where there is an immediate risk to guests/employees, a Store is closed until the issue is resolved. Any store closure will require the consent of the responsible Regional Business Director.

1. HEALTH AND SAFETY ISSUE IDENTIFIED BY VIA WITHIN A STORE

Where VIA either directly or via contracting partners, such as consultants, identify something that could be a Health and Safety concern within a store then they must be aware of the process to follow and it must include the following defined steps:

- Point the concern out to the most senior member of the Brand/Operator in the store;
- Remind them that the responsibility for Health and Safety in their store lies with the Brand/Operator;
- Recommend that they take steps to ensure that the area of concern is made safe;
- Escalate the Health and Safety concern through the dedicated VIA person of contact (either Head of Retail or Brand captain). Decide whether a store must be closed if there is an immediate risk;
- Remind the most senior on-site member of the Brand/Operator that their Health and Safety protocols ought to require (i) they report the matter to their head office and (ii) where applicable, they arrange for a local contractor to attend immediately to rectify the fault. (If the Centre has names and numbers of local contractors, the Centre can share them informally, but it is important to clarify that these are not recommended partners of VIA Outlets

and that the Brand/Operator must select and employ their own contractor);

- Inform the local Legal Team and with their assistance, confirm the conversation with the senior member of the Brand/Operator by e-mail or letter to the Brand's/Operator's head office; check back after an appropriate period to see if the matter has been addressed. If it has not, consider escalation to a more senior contact at the Brand/Operator.

2. HEALTH AND SAFETY ISSUES NOTIFIED TO VIA BY A BRAND WITHIN A STORE

Where VIA employees either directly or via contracting partners, such as consultants, are made aware by a Brand/Operator of something that could be a Health and Safety concern within their store, they must be aware of the process to follow and it must include the following defined steps:

- Remind the Brand/Operator that Health and Safety responsibility for the store lies with the Brand/Operator;
- Suggest they speak to the most senior person that they currently have in the store and/or their head office about their concerns.

3. VIA AND INHERITED SHOP-FIT WORKS FROM A DEPARTING BRAND

From time to time, VIA may inherit a shop-fit from a previous Brand. Prior to providing such shop-fit to a new Brand, VIA needs to make clear where responsibilities and liabilities lie.

The preferred solution is that a store is handed over to a Brand as an empty shell and the incoming Brand fits-out the store.

3.1 SCOPE AND SCHEDULE

An assessment must be carried out to identify and produce a schedule of all the items that are to be transferred as the Inherited shop-fit.

The items to be transferred must be within the item's relevant lifecycle and must remain within that lifecycle throughout the duration of the Brand contract.

The Centre must have any relevant permits and maintenance records required by law for the Inherited Shop-fit.
An external Health and Safety expert may be appointed to assess and sign-off the Inherited Shop-fit.

Any repair/remedial work recommended by the external Health and Safety expert must be completed.

Please refer to the inherited shop fit guidelines for specific guidelines.

3.2 VIA OUTLETS WORK FOR A BRAND IN A STORE

It is recognised that in a small number of circumstances VIA may carry out work in a store for a Brand. Any such work must be carried out in accordance with these Rules.

3.3 APPROVALS AND SUPERVISION

Both the agreement and authorisation from the Centre Management Team must be secured prior to proceeding with any work in a store for a Brand. Centre Management Team must implement and maintain a clear procedure to authorise, organise and supervise all such work.

3.4 CARRYING OUT THE WORK

All such works need to be carried out in accordance with clearly defined scope and written contract. VIA Outlets will appoint an external approved professional team to manage and deliver the works. Whilst specific roles will reflect the nature and scope of the works, a designer and project manager must be appointed and the following procedures must be included:

- An approved contractor completes the work on behalf of VIA Outlets;
- All external consultants and contractors must have sufficient skills, knowledge, experience and capability to carry

out the proposed work to a suitable and satisfactory standard and in such a way that secures Health and Safety. A process must be in place to ensure suitable checks are carried out prior to appointment and must include evidence of prior experience of similar projects;

- Experience and qualifications of proposed personnel;
- Skills and knowledge to identify, reduce and manage Health and Safety risks;
- Safety performance, including reportable employee accidents and public liability claims in the past 3 years and any Health and Safety enforcement action taken by the government/regulatory authorities over the same period;
- Suitable insurance cover must be required including cover for:
  i. Liability arising from death or injury to any employee or third party; professional indemnity cover;
  ii. Provision of warranties for their work.

3.5 STORE OPENING

All VIA Outlets work must have been completed, and the Centre Management Team must have received written sign-off from the external Health and Safety expert, prior to the date on which the Brand opens for trade in the store where the works have taken place.

IV. CONTRACTORS WORKING IN CENTRES

1. CONSTRUCTION

Construction activity can range from short duration, simple projects involving a small number of people through to complex projects lasting months and involving many people.

Regardless of size and duration, all construction projects need to be organised and managed effectively to ensure Health and Safety from start to finish.

The key to achieving suitable healthy and safe working arrangements is to ensure that Health and Safety issues are effectively planned, organised, controlled, monitored and reviewed.

In some circumstances, VIA requires approval of construction works and in other cases notification to VIA's insurers is sufficient. In the event of approval and/or notification, please refer to the Landlord and Tenant Works that can be found on VIAShare.

It is appreciated that construction activity will be subject to specific Health and Safety regulations within individual jurisdictions. In the event of any conflict with these Rules, then compliance with applicable local country requirements is the clear and unequivocal requirement.

2. CONTEXT

Organising for safety in construction projects must be considered in two distinct phases:

- Pre-construction phase – the period of time during which design or preparatory work is carried out; and
- Construction phase – the period of time beginning when construction starts until construction work is finished.

Three roles that feature prominently in the construction works are:

- Principal designer – appointed to take control of the pre-construction phase and intended to include architects, structural engineers and surveyors;
- Principal contractor – contractor appointed to coordinate the construction phase of a project where it involves

more than one contractor.

- Health and Safety coordinator – appointed by VIA to manage the Health and Safety issues, both during the pre-construction phase and the construction phase as per local legislation.

2.1 SETTING OUT VIA OUTLETS RESPONSIBILITIES

As the client, VIA Outlets will have several key responsibilities throughout the duration of the project, enabling those carrying out the project to manage Health and Safety in an effective and proportionate way.

From the point of view of allocation of the Responsibilities, the construction works within VIA can be classified in 4 types:

i. Development Construction Projects
ii. Retail Development Construction Projects
iii. Operational/Maintenance Construction Projects
iv. Construction Projects executed by Tenants.

The construction projects type I, II and III fall fully within the responsibility of VIA, and therefore VIA must guarantee that the Health and Safety Rules are respected in the entire process.

The construction projects type IV executed by Tenants, are the responsibility of the Tenant that has commissioned those works. VIA should not be responsible for the Health and Safety of the works done inside the premises by the tenants. The tenants must guarantee that their consultants (designer and / or Health and Safety coordinator) and contractors respect the Health and Safety Rules.

2.2 VIA OUTLETS REPRESENTATIVE

A single/primary VIA Outlets representative must be allocated to every project at the outset and for the duration of the project to ensure effective communication, continuity and coordination with appointed specialists such as the principal designer, Health and Safety coordinator and principal contractor.

For the different VIA Outlets types of Construction Projects, the VIA OUTLETS representative will be:

i. Development Construction Projects: **THE REGIONAL DEVELOPMENT MANAGER**
ii. Retail Development Construction Projects: **THE CENTRE RETAIL DEVELOPMENT MANAGER**
iii. Maintenance Construction Projects: **THE CENTRE OPERATIONS MANAGER**
iv. Construction Projects executed by Tenants: **THE CENTRE RETAIL DEVELOPMENT MANAGER**

The VIA Outlets representative must:

- Appoint the needed team to comply with the Health and Safety regulations in each country. Depending on the local regulations and depending on the size and importance of the construction project, the requirement may be different. For big constructions projects normally a principal designer, a Health and Safety coordinator and a principal contractor are required whereas for small projects sometimes all duties can be performed by the contractor.
- Ensure that the appointed principal designer, Health and Safety coordinator and principal contractor carry out their duties in Health and Safety duties according to the local regulations. It is essential that their obligations related to Health and Safety are clearly written in their contract or purchase order.
- Ensure that the principal designer prepares pre-construction Health and Safety plans and ensure that the principal contractor prepares a construction phase Health and Safety plan before that phase begins.
- Attend project milestone Health and Safety meetings;
- Ensure that the principal designer (or other appointed person) prepares a Health and Safety file for the project,
- Ensure that the Tenant has appointed designers and contractors that will fulfil the Health and Safety obligations.

3. PERFORMING WORKS IN THE CENTRES' IN COMMON AREAS

3.1 SAFE WORKING PROCEDURES AND PERMITS

All work activities in the Centres must be carried out with approval of the Centre Operations Team. Central to achieving this objective is the emphasis we place on expecting the Centres to implement and maintain an effective risk assessment process.

3.2 SAFE WORKING PROCEDURES

It is not always possible to take steps to physically eliminate hazards and some element of risk remains.
In these circumstances it is beneficial to develop a safe working procedure (safe method). This procedure results from a systematic examination of a working process which identifies both hazards and specific work methods designed to eliminate the hazards or control and minimise the relevant risks. The written safe working procedure must define the safe method for carrying out the tasks(s). Essentially the procedure must identify the:

- Physical and technical controls required;
- Expected behaviours;
- Procedure:
  i. exact nature of the tasks;
  ii. the sequence;
  iii. the checks and key safety actions.

Typical tasks that may involve Centre employees and must have a safe working procedure include, for example:

- Work at height;
- Use of a compactor *(see chapter I – Operational Management of the VIA Centres, sub-section 16.2)*;
- Handling and using LPG cylinders;
- Adverse weather – deployment and response *(see chapter I – Operational Management of the VIA Centres, sub-section 10)*;
- Working in car parks and road/roadside working;
- Assisting vehicles reversing or manoeuvring; and
- Hot works.

All VIA employees involved in Centre operations which are subject to a Safe Working Procedure must be fully trained in the correct procedure including induction and refresh training where relevant.

Tasks and activities organised through a safe working procedure must be subject to the appropriate levels of supervision reflecting the increased hazard of the task.

3.3 PERMIT TO WORK SYSTEM

Higher risk activities must be carried out under a written permit to work system. This is a formal written system used to control certain types of work that are potentially hazardous. Each Centre must:

- Maintain a suitable written permit to work system;
- Ensure all relevant persons responsible for issuing and or closing permits have received suitable training in the permit to work system. Full training records must be retained;
- Only trained personnel can be authorised by the Centre Management Team to issue and close permits;
- A written register of authorised persons will be maintained;
- Defined work is not allowed to proceed without a permit;
- The permit to work system applies to defined work – regardless of who carries out the work – employees or contractors;
- Hot works will always be considered as "defined work" and must always be controlled by a permit to work;

- The type of work that must be subject to a permit ("defined work") must be set out in writing and be included in relevant communications with contractors. Defined work may include (for example):
    i. hot work;
    ii. Impairments (see note below)
    iii. roof work;
    iv. work below ground including excavation/ digging (underground services);
    v. work at height in the Centre during trading hours;
    vi. isolation of critical services/systems such as fire alarms, water supply including firefighting water; and
    vii. specified electrical work.

Responsibility for issuing permits is held by the Centre Operations Team. All permit records must be kept for a minimum of 12 months and be held by the Centre Operations department.

What is an impairment?

An impairment arises, when an automatic protection system is shut off or otherwise taken out of service, either completely or in part, such that it can no longer provide the intended fire protection. These systems include;

- Sprinklers
- Fire suppression (FM200, Ansul, water mist etc.)
- Fire hydrants
- Fire hoses
- Heat and smoke detection

Please refer to the Impairment Guidelines and complete the Impairment Notification Form and Impairment Permit Checklist on VIAShare.

4. HOT WORKS

Hot Works is the application of heat that has the potential to generate significant heat or sparks (i.e. use of grinders) and/or involves an open flame (i.e. use of blow torches/lamps, welder etc.). Hot Works take place frequently in our Centres and significantly increase the risk of fire.

It must be ensured that Hot Works which occur at the Centre are managed appropriately and diligently. To assist in managing the Hot Works, please complete following documents that can be found on VIAShare:

- "Hot Works Permit Failings" and "Hot Works Guidance Checklist": This is to be checked in any instance where a contractor is appointed by the Centre that is doing Hot Works;
- ""Hot Work Permit": This document is to be supplied and used by any contractor, Centre or Brand appointed, who does not have a Hot Work permit system in place. This permit ensures that the area where the works are taking place is clear, fire protection is in place and the equipment used in good repair;
- "Insurer Notification Form": This document is to be supplied and used by any contractor, Centre or Brand appointed. This notification form should be completed by the Centre or VIA representative and issued VIA insurance by email to insurance@viaoutlets.com and VIAOutlets@ajg.com. This is also expected in case of VIA's own contractors.

Most fire losses, caused by Hot Works, are due to insufficient management and supervision. VIA needs to ensure that it is protected by the above documents.

5. APPOINTING ARCHITECTS, HEALTH AND SAFETY COORDINATORS AND PRINCIPAL CONTRACTORS

Architects, Health and Safety coordinators and principal contractors must have sufficient skills, knowledge, experience and capability to carry out the proposed work in such a way that Health and Safety is assured. A VIA Representative must guarantee that the obligations related to Health and Safety issues are clearly described into the contract or purchase order. Please refer to standard legal template contracts in each country.

5.1 PRE-CONSTRUCTION PHASE
In the pre-construction phase the principal architect/ Health and Safety coordinator must:

- Plan, coordinate, manage and monitor Health and Safety in the pre-construction phase;
- Develop the pre-construction Health and Safety plan;
- Ensure effective communication, coordination and cooperation between parties where required;

5.2 PRE-CONSTRUCTION HEALTH AND SAFETY PLAN
The principal architect or Health and Safety coordinator must be appointed to develop the plan. This plan must be developed in advance of tendering or contractor selection. The plan must be shared with contractors bidding for the work or already appointed to the project.

The plan must include the following:

- General description of the project stages and details of the work plans;
- Details of known Health and Safety risks and control measures taken;
- Relevant information from any previous Health and Safety file;
- Health and Safety information likely to be required by the principal contractor to manage Health and Safety, relevant risks and develop a construction phase plan. This will likely include Centre-specific requirements that will need to be addressed within the plan, for example:

    i. Dedicated site access/egress;
    ii. Construction site traffic routes and separation from regular Centre traffic;
    iii. Site hoardings – design and appearance; nuisance (for example noise, dust) – measures for elimination, prevention and reduction.

5.3 CONSTRUCTION PHASE
To manage the construction phase, principal contractor, architect and Health and Safety coordinator must ensure that:

- Those engaged to carry out the work are capable of doing so;
- Effective prevention and protective measures are put in place to control risks;
- The right plant, equipment and tools are provided to carry out the work; any specific requirements for working adjacent to/ in proximity of the Centre are implemented and maintained.
- All staff are properly registered into the Social Security system and properly insured according to local regulations.

5.4 CONSTRUCTION PHASE HEALTH AND SAFETY PLAN
Site work must not start until the principal contractor has developed a construction phase Health and Safety plan. The Health and Safety plan normally has to be approved by the principal architect / Health and Safety coordinator.

The construction phase Health and Safety plan must be proportionate to the scale and complexity of the project and the risks involved. It must include:

- Health and Safety aims for the project;
- Arrangements for ensuring cooperation between project team members and coordination of work including site meetings to ensure Health and Safety throughout the duration of the project;
- Communication of Health and Safety;
- Specific arrangements including:

    i. site induction;
    ii. site rules;
    iii. welfare facilities;
    iv. control of specific risks; and
    v. emergency procedures.

Arrangements for ensuring safety adjacent/in proximity to Centre operations (including those items identified in the pre-construction phase plan).

5.5 PRINCIPAL CONTRACTOR – ARRANGEMENTS FOR MONITORING SAFETY

The principal contractor must ensure that effective arrangements are in place including:

- Routine monitoring of site access, work areas, plant and equipment; and
- Investigating accidents, incidents and near misses.

Arrangements must include a process for implementing correction actions.

5.6 PROJECT MILESTONE REVIEWS AND REPORTING

During the construction phase milestone reviews must be arranged. Attendees must include the principal architect, the Health and Safety coordinator, the principal contractor and the VIA Outlets Representative. These reviews must include reporting of Health and Safety performance including:

- Accidents, incidents and near miss information,
- Site safety performance and arrangements generally; review of progress against plan including any changes required to the Health and Safety construction phase plan.

5.7 HEALTH AND SAFETY FILE

The principal architect, Health and Safety coordinator and principal contractor must produce a Health and Safety file. The Health and Safety file must contain information to be considered in any future project. The following must be considered for inclusion:

- Brief description of the work carried out;
- Any hazards not eliminated through design or construction (for example, pre-existing contamination, asbestos).

5.8 MILESTONE REVIEWS AND REPORTING

Key structural principles (for example, bracing) and safe working loads (for example, floors and roofs):

- information regarding removal or dismantling of plant and equipment (for example, any special lifting equipment required);
- cleaning and maintenance information;
- services – type, location and markings including underground cables, gas supply equipment and fire-fighting water supplies; and
- ‘as built’ drawings of the buildings/construction.

5.9 PROJECT REVIEW

A process must be developed, implemented and maintained for reviewing the project after completion to identify learning opportunities to take into account and integrate into future construction projects.

6. BUILDING FABRIC AND SYSTEMS CONTRACTORS (BFS CONTRACTORS)

This section relates to what is sometimes called hard facilities management. BFS Contractors will regularly visit the Centres to carry out a wide range of building related construction, maintenance and servicing activities. BFS Contractors deal with issues such as building fabric maintenance, mechanical and electrical engineering, plumbing, drains, lifts and escalators, air conditioning and so forth. It may be that the BSF Contractor’s representative is a regular visitor or makes a one-time only visit. Whatever the circumstances, the work activities need to be carried out safely, without risk to health and to avoid creating any unnecessary nuisance.

A single/primary VIA Outlets representative (normally the Centre Operations Manager) must be allocated to the project at the outset and for the duration of the project to ensure effective communication, continuity and coordination with the BFS contractors.

These Rules outline expectations for commissioning BFS Contractors. It must be noted that in relation to other contractors

which VIA uses, there are separate applicable Rules:

- Soft facilities management, i.e. contractors who often visit daily and provide core services, such as security and cleaning, are dealt with separately as they are CSP's (Contracted Service Providers);
- Situations where the Retail Development Team provide Brands with the primary VIA contact.

All BFS contractors are responsible for Health and Safety relating to their services. Their contracts of engagement must address this responsibility.

6.1 ASSESSMENT AND REVIEW OF PROSPECTIVE CONTRACTOR

Initially and as part of the evaluation and selection process for a BFS Contractor being added to an approved contractor list, each Centre must carry out an assessment of all prospective BFS Contractors' safety arrangements and performance including:

- Capability and experience, including sample risk assessments and method statements (see below for explanation);
- Evidence of competence, including professional certifications and safety training; safety performance, including reportable employee accidents and public liability claims in the past three years and any Health and Safety enforcement action taken by the government/regulatory authorities over the same period.

Annually thereafter, relevant contractor safety information needs to be reviewed, including verification of any renewable professional certificates and training, insurance renewal certification and updated safety performance information including reportable employee accidents and any public liability claims.

6.2 CONTRACTOR'S RISK ASSESSMENTS

Prior to commencing work all BFS Contractors must have submitted a suitable risk assessment and method statement (a description of the sequence of how the work is to be carried out in a safe manner) and, their relevant insurance details annually.

6.3 APPROVAL OF SUB-CONTRACTOR

If the BFS Contractor is intending to use a sub- contractor(s) then this must be agreed and approved in writing by the Centre Management Team prior to work commencing. However, it must be clear that the Contractor remains responsible for sub-contractors and the competency of sub-contractors.

6.4 CONTRACTUAL PROVISIONS

The contract to engage any BFS Contractor must contain appropriate provisions regarding allocation of liability, indemnification, insurance. Please work with your Centre Legal Team to make sure the standard VIA contracts are being used.

6.5 GENERAL EXPECTATIONS DURING THE WORK INCLUDE:

- All BFS Contractors must abide by the site safety rules and be familiar with the emergency procedures (and make sure their own employees abide by these rules);
- Activities subject to a permit to work must be suitably organised by the BFS Contractor, and also authorised by a designated Centre Management representative;
- BFS Contractors are required to make sure their own employees sign-in and out on a daily basis;
- BFS Contractors are required to report any relevant incidents and accidents immediately to Centre Management.

Whilst the contractor is exclusively responsible for supervising its own work and ensuring its personnel work safely, each Centre must maintain reasonable arrangements for monitoring BFS Contractors' activities together with a procedure for corrective actions and escalation of safety violations.

7. CONTRACTED SERVICE PROVIDERS (CSP)

These Rules relate to, what is sometimes called, soft facilities management. "Contracted services" or "soft facilities

management" means contractors who visit Centres frequently (often daily) and provide non-building related core services such as cleaning, grounds maintenance and security. The range of contracted services procured across VIA Outlets business varies from Centre to Centre but generally these service providers make an important contribution in helping to deliver excellent guest services and maintaining the Centre environment to a high standard.

CSP's are responsible for Health and Safety relating to their services. Their contracts of engagement must reference this responsibility. Please always work with your Centre Legal Team to have the right VIA requirements and expectations included in any contract.

7.1 PROCUREMENT - EVALUATION AND SELECTION OF CONTRACTORS

As part of the evaluation and selection process for CSP's, each Centre must include an evaluation of prospective CSP's safety arrangements and performance including:

- Capability and experience.
- Evidence of competence including professional certifications and safety training.
- Safety performance including reportable employee accidents and public liability claims and any Health and Safety enforcement action by government/regulatory authorities during the past three years.
- Suitable insurance cover.

7.2 SAFETY EXPECTATIONS

CSP's are expected to carry out their activities safely and must:

- Develop and maintain Centre-specific risk assessments for their operations and activities. Risk assessment must reflect the Centre's environment, standards and expectations for safe behaviours and housekeeping. These should be given to the Centre Management Team.
- Ensure their personnel always comply with Centre safety management arrangements and rules. Centre Management must communicate these arrangements and rules in writing to CSP's and retain a record of this communication.
- Provide their employees with a Centre-specific site induction to include coverage of relevant risk assessment prior to carrying out any work in the Centre. Their induction must also include coverage of relevant Centre safety arrangements and rules. The CSP must keep a record of all safety training provided.
- Ensure any incidents, accidents or faults are reported immediately to Centre Management.
- Implement and maintain arrangements for checking and assuring safety compliance. Assurance records must be retained for a minimum of 12 months and be available for review at any time by Centre Management.

7.3 FORMAL REVIEW OF CSP

The Centre Operations Team must regularly monitor the safety performance of CSP's including a formal review on an annual basis. This annual review must include disclosure by the CSP of their organisation's relevant safety information, for example any government/authority's Health and Safety enforcement action and reportable accidents.

8. CONTRACTOR ACTIVITY NEAR GUESTS

RISK OF AN ACCIDENT FROM CONTRACTOR ACTIVITY NEAR GUESTS

Any contractor activity in the Centre near guests during trading hours introduces potential risk and potentially creates nuisance, an adverse impact on visual amenity and potential Health and Safety hazards.

These risks can be significant, and in the absence of suitable controls, there is the distinct possibility of an accident arising, for example, from:

- Working equipment and materials being brought onto and removed from the Centre (for example long ladders carried by one person rather than being carried by at least two people);
- Guests walking into an unsecured work area and coming into contact with the work materials, equipment or the contractor(s);
- Work equipment or materials falling from height and striking someone;
- Leaving cleaning materials, paint or machinery unattended.

8.1 MANAGING CONTRACTOR ACTIVITY NEAR GUESTS

These risks are very significant, and any work needs to be managed based on the following hierarchy of controls:

- Contractor activity in the Centre in the proximity of guests must be avoided during trading hours where possible. If contractor work activity is necessary during trading hours in the proximity of guests, such work must be pre-authorised by Centre Management and scheduled by the contractor, where possible, to be carried out during periods of least likely footfall;
- Contractor work activities authorised by the Centre Management Team must have a specific risk assessment by the contractor, including control arrangements reflecting that the work is being carried out during trading hours; and
- Work above ground level must not be carried out during trading hours except for emergency work including make safe activities and must be organised and managed under a work permit *(see chapter IV-Contractors Working in Centres, sub-section 3.1 "Safe Working Procedures and Permits")*. Any such emergency works undertaken during trading hours must be clearly marked with adequate signage and cordoned off to prevent any guests near the construction area.