

Sipral UK Ltd., 40 Bank Street, Canary Wharf, London E14 5NR, www.sipral.com

Organizational regulation

L-01-34

CDM Policy

written by
Sam Stevens
HS Advisor

approved by
Jamie Young
CEO

validity from
2.9.2019

last revision no. 06
14.4.2026

This document becomes an uncontrolled copy after printing.

Forwarding, copying and sharing the content with natural or legal persons outside the company is possible only upon agreement of the company management.

Sipral UK Ltd., 40 Bank Street, Canary Wharf, London E14 5NR, www.sipral.com

Content

Amendments	2
1 General provisions	4
1.1. Introduction.....	4
1.2 Scope.....	4
2 CDM Policy.....	5
2.1 Duties of Principal Designers.....	6
2.2 Duties of Designers	7
2.3 Duties of Principal Contractors	7
2.4 Duties of Contractors.....	8
2.5. Legal Clarification	8
3 Integration of CDM with BSA 2022.....	9
3.1 Higher-Risk Buildings (HRBs).....	9
3.2 Competence and Accountability	9
3.3 Golden Thread of Information.....	9
3.4 Interface with Building Safety Regulator (BSR).....	9

This document becomes an uncontrolled copy after printing.

Forwarding, copying and sharing the content with natural or legal persons outside the company is possible only upon agreement of the company management.

Sipral UK Ltd., 40 Bank Street, Canary Wharf, London E14 5NR, www.sipral.com

1 General provisions

1.1. Introduction

The Company confirms its commitment to good management of health and safety in construction under the Construction (Design and Management) Regulations 2015 (CDM 2015) and the Building Safety Act 2022 (BSA 2022).

1.2 Scope

This policy applies to all employees of Sipral UK Ltd. (hereinafter "Sipral") and all companies working on its behalf. It reflects compliance not only with CDM 2015 but also with duties and obligations introduced under the BSA 2022, especially where projects involve Higher-Risk Buildings (HRBs).

Sipral UK Ltd., 40 Bank Street, Canary Wharf, London E14 5NR, www.sipral.com

2 CDM Policy

Sipral is aware of its responsibilities under CDM 2015 and BSA 2022 and full compliance with the regulations.

CDM Dutyholders	Summary of Role / Main Duties
<p>Commercial Clients are organisations or individuals for whom a construction project is carried out that is done as part of a business.</p>	<p>Make suitable arrangements for managing a project. This includes making sure:</p> <ul style="list-style-type: none"> - other dutyholders are appointed as appropriate, - sufficient time and resources are allocated. <p>Make sure:</p> <ul style="list-style-type: none"> - relevant information is prepared and provided to other dutyholders, - the Principal Designer and Principal Contractor carry out their duties, - welfare facilities are provided.
<p>Domestic Clients are people who have construction work carried out on their own home, or the home of a family member that is not done as part of a business.</p>	<p>Though in scope of CDM 2015, their client duties are normally transferred to:</p> <ul style="list-style-type: none"> - the Contractor for single contractor projects, - the Principal Contractor for projects with more than one Contractor. <p>However, the domestic client can instead choose to have a written agreement with the Principal Designer to carry out the client duties.</p>
<p>Designers are organisations or individuals who as part of a business, prepare or modify designs for a building, product or system relating to construction work.</p>	<p>When preparing or modifying designs, to eliminate, reduce or control foreseeable risks that may arise during:</p> <ul style="list-style-type: none"> - construction, - the maintenance and use of a building once it is built. <p>Provide information to other members of the project team to help them fulfil their duties.</p>
<p>Principal Designers are designers appointed by the client in projects involving more than one contractor. They can be an organisation or an individual with sufficient knowledge, experience and ability to carry out the role.</p>	<p>Plan, manage, monitor and coordinate health and safety in the pre-construction phase of a project.</p> <p>This includes:</p> <ul style="list-style-type: none"> - identifying, eliminating or controlling foreseeable risks, - ensuring designers carry out their duties. <p>Prepare and provide relevant information to other dutyholders.</p> <p>Liaise with the principal contractor to help in the planning, management, monitoring and coordination of the construction phase.</p>

This document becomes an uncontrolled copy after printing.

Forwarding, copying and sharing the content with natural or legal persons outside the company is possible only upon agreement of the company management.

Sipral UK Ltd., 40 Bank Street, Canary Wharf, London E14 5NR, www.sipral.com

CDM Dutyholders	Summary of Role / Main Duties
<p>Principal Contractors are contractors appointed by the client to coordinate the construction phase of a project where it involves more than one contractor.</p>	<p>Plan, manage, monitor and coordinate health and safety in the construction phase of a project. This includes:</p> <ul style="list-style-type: none"> - liaising with the Client and Principal Designer, - preparing the construction phase plan, - organising cooperation between contractors and coordinating their work. <p>Make sure:</p> <ul style="list-style-type: none"> - suitable site inductions are provided, - reasonable steps are taken to prevent unauthorised access, - workers are consulted and engaged in securing their health and safety, - welfare facilities are provided.
<p>Contractors are those who carry out the actual construction work, contractors can be an individual or a company.</p>	<p>Plan, manage and monitor construction work under their control so that it is carried out without risk to health and safety.</p> <p>For projects involving more than one contractor, coordinate their activities with others in the project team – in particular, comply with directions given to them by the Principal Designer or Principal contractor.</p> <p>For single contractor projects, prepare a construction phase plan.</p>
<p>Workers are those working for or under the control of contractors on a construction site.</p>	<p>They must:</p> <ul style="list-style-type: none"> - be consulted about matters which affect their health, safety and welfare, - take care of their own health and safety and others who might be affected by their actions, - report anything they see which is likely to endanger either their own or others' health and safety, - cooperate with their employer, fellow workers, contractors and other dutyholders.

2.1 Duties of Principal Designers

A Principal Designer is the designer with control over the pre-construction phase of the project. This is the very earliest stage of a project from concept design through to planning the delivery of the construction work. The principal designer must be appointed in writing by the client.

The principal designer can be an organisation or an individual that has:

- the technical knowledge of the construction industry relevant to the project;
- the skills, knowledge and experience to understand, manage and coordinate the pre-construction phase, including any design work carried out after construction begins.

Sipral is not in the role of Principal Designer but will be the Designer for certain aspects of the project.

In liaison with the client and principal contractor, the principal designer has an important role in influencing how the risks to health and safety should be managed and incorporated into the wider

This document becomes an uncontrolled copy after printing.

Forwarding, copying and sharing the content with natural or legal persons outside the company is possible only upon agreement of the company management.

Sipral UK Ltd., 40 Bank Street, Canary Wharf, London E14 5NR, www.sipral.com

management of a project. Decisions about the designs taken during the pre-construction phase can have a significant effect on whether the project is delivered in a way that secures health and safety. The principal designer's role involves coordinating the work of others in the project team to ensure that significant and foreseeable risks are managed throughout the design process.

Where we act as Principal designers or are part of a team undertaking this role we shall:

- plan, manage, monitor and coordinate the pre-construction phase, taking into account the contents of any pre-construction information, construction phase plan or existing H&S file;
- identify, eliminate or control foreseeable risks – taking into account the principles of prevention;
- ensure cooperation and coordination between all relevant Dutyholders;
- provide pre-construction information – this is information already in the client's possession or which is reasonably obtainable;
- liaise with the principal contractor for the duration of their appointment.

2.2 Duties of Designers

A designer is an organisation or individual who:

- prepares or modifies a design for a construction project; or
- arranges for or instructs someone else to do so.

A designer has a strong influence during the concept and feasibility stage of a project. The earliest decisions can fundamentally affect the health and safety of those who will construct, maintain, repair, clean, refurbish and eventually demolish a building. A designer should address health and safety issues from the very start.

Where Sipral are Designers' we shall ensure that we:

- make clients aware of their duties;
- when preparing or modifying designs, we shall take account of the general principles of prevention and the pre-construction information provided to us;
- eliminate, reduce or control foreseeable risks through design;
- provide design information to other duty holders using or implementing the design;
- cooperate with other duty holder.

2.3 Duties of Principal Contractors

A principal contractor is the organisation or person that coordinates the work of the construction phase of a project involving more than one contractor, so it is carried out in a way that secures health and safety.

Although rare, we do occasionally take on the role of Principal Contractor and when we do, we ensure the following:

- In planning, managing, monitoring and coordinating the construction phase, we will take account of the general principles of prevention.
- We shall ensure that contractors under our control cooperate with each other and coordinate their activities.
- Provide suitable site inductions to every site worker – this shall be site specific and highlight any particular risks and control measures that those working on the project need to know about.
- Preventing unauthorised access to the site.
- Provide suitable and sufficient welfare facilities which are maintained throughout the construction phase;.
- Liaise with the principal designer for the duration of the project.

This document becomes an uncontrolled copy after printing.

Forwarding, copying and sharing the content with natural or legal persons outside the company is possible only upon agreement of the company management.

Sipral UK Ltd., 40 Bank Street, Canary Wharf, London E14 5NR, www.sipral.com

- Consult and engage with workers to ensure that measures for their health, safety and welfare are developed, promoted and checked for effectiveness.

Sipral is not in the role of Principal Contractor but will be the Contractor for certain aspects of the project.

2.4 Duties of Contractors

A contractor is anyone who directly employs or engages construction workers or manages construction work. Contractors and the workers under their control are those most at risk of injury and ill health. They can influence the way work is carried out to secure their own health and safety and that of others affected.

When we undertake the role of a Contractors, we ensure the follow:

- Making clients aware of their duties.
- Plan, manage and monitor construction work under our control so it is carried out in a way that controls the risks to health and safety.
- Appoint only competent contractors or workers or provide suitable training to allow them to become competent.
- Provide appropriate supervision for employees and contractors under our control.
- Provide information and instructions to employees and contractors so they can carry out their work without risk to health and safety.
- Prevent unauthorised access to site.
- Provide welfare facilities which meet the minimum requirements set out in Schedule 2.

Where construction work is subject to the Building Regulations 2010 (as amended), Sipral recognises that dutyholder roles under the Building Regulations are separate from, and additional to, duties under CDM 2015, even where role titles are similar. Compliance with one regime does not remove or reduce obligations under the other.

2.5. Legal Clarification

All appointments of Principal Designers and Principal Contractors shall be made in writing and as early as practicable. Where a project meets the notification thresholds under CDM 2015, the Client is responsible for notifying the Health and Safety Executive. Sipral will support the Client or Principal Contractor by providing relevant information within our scope of work.

Competence under CDM is defined as having the skills, knowledge, experience and organisational capability appropriate to the nature and complexity of the project.

Sipral UK Ltd., 40 Bank Street, Canary Wharf, London E14 5NR, www.sipral.com

3 Integration of CDM with BSA 2022

3.1 Higher-Risk Buildings (HRBs)

For the purposes of the Building Safety Act 2022, a Higher-Risk Building (HRB) during the design and construction phase is defined as a building in England which is at least 18 metres in height or has 7 or more storeys, and which contains at least two residential units, or is a hospital or care home during design and construction.

Sipral will identify HRB status at the earliest possible stage and will cooperate fully with the Client and other dutyholders to ensure compliance with the enhanced regulatory requirements which apply to such projects.

Where works relate to an HRB, Sipral recognises that:

- the Building Safety Regulator (BSR) is the Building Control Authority,
- the Gateways regime applies, including Gateway 1 (planning), Gateway 2 (pre-construction approval) and Gateway 3 (completion certification),
- construction works must not commence unless Gateway 2 approval has been granted.

Sipral will support Gateway submissions by providing accurate and timely information within its scope of work.

3.2 Competence and Accountability

Sipral recognises that, under the Building Safety Act 2022 and the Building Regulations, competence is a legal requirement.

Sipral will:

- ensure that organisations and individuals appointed have the skills, knowledge, experience and organisational capability appropriate to their role,
- provide suitable training and supervision where required,
- maintain records demonstrating competence and role suitability,
- clearly define and document roles and responsibilities when acting as a Designer or Contractor.

3.3 Golden Thread of Information

For projects subject to the Building Safety Act 2022, Sipral will contribute to and maintain the Golden Thread of Information within the scope of its work.

When acting as Designer or Contractor, Sipral ensures:

- design and construction information is accurate, complete, digital and traceable,
- changes are properly controlled and recorded,
- information is shared promptly with relevant dutyholders,
- data is provided in a format suitable for handover to the Accountable Person or Principal Accountable Person.

3.4 Interface with Building Safety Regulator (BSR)

Although Sipral does not generally act in a client or principal regulatory role, it will actively cooperate with the Building Safety Regulator by:

- providing requested information within its scope of work,
- supporting the Principal Contractor or Designer with required documentation within Sipral's scope,
- supporting change control processes during HRB construction,
- responding promptly to safety or compliance-related information requests,

This document becomes an uncontrolled copy after printing.

Forwarding, copying and sharing the content with natural or legal persons outside the company is possible only upon agreement of the company management.

Sipral UK Ltd., 40 Bank Street, Canary Wharf, London E14 5NR, www.sipral.com

- assisting with mandatory occurrence reporting where relevant,
- supporting inspections, audits or compliance checks, cooperating with and responding promptly to requests from the Building Safety Regulator within our scope of work.

This document becomes an uncontrolled copy after printing.

Forwarding, copying and sharing the content with natural or legal persons outside the company is possible only upon agreement of the company management.