



THE CONSORTIUM
ACADEMY TRUST

Shaping Positive Futures

ALLERGY AND ALLERGENS POLICY

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Equality Impact Statement	Equality Impact Statement: The Trust uses Equality Impact Assessments to consider policies and processes focussing on fairness, access and inclusion and how different groups might be affected. This includes the requirement to make reasonable consideration and adjustments to account for the individual needs of employees. This is part of our duty under the Equality Act (2010).

This document can only be considered valid when viewed on The Consortium Academy Trust website. If the copy is printed or downloaded and saved elsewhere the Policy date should be cross referenced to ensure the current document is referenced. The linked policies can be viewed at www.consortiumtrust.co.uk

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Policy Statement

Why the Policy Is Needed

The Consortium Academy Trust is committed to providing a safe, inclusive and supportive learning environment in which every learner can participate fully in school life regardless of any diagnosed food allergy, medical dietary requirement or risk of anaphylaxis.

The Trust recognises that severe allergic reactions can occur rapidly and may become life-threatening without prompt recognition and treatment. Effective allergen management is therefore regarded as an integral part of safeguarding, health and safety, inclusion and learner wellbeing.

The Trust is committed to developing an allergy-aware culture across all schools through effective leadership, competent staff, clear communication and partnership working with learners, parents and carers, healthcare professionals and the current catering providers.

In implementing this procedure, the Trust seeks to discharge its statutory duties under:

- Children and Families Act 2014
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Equality Act 2010
- Food Safety Act 1990
- Food Safety and Hygiene (England) Regulations 2013
- Food Information Regulations 2014
- Human Medicines (Amendment) Regulations 2017

Together with current Department for Education guidance relating to supporting learners with medical conditions and allergy safety in schools.

The Trust believes that effective allergen management is achieved not through lengthy procedures but through competent people, effective communication, sensible risk management and continual monitoring.

What the Policy is About

Food forms an important part of everyday life within the Trust through school meals, breakfast clubs, curriculum activities, educational visits, residential experiences, after-school provision and community events.

Whilst the designated catering providers is responsible for the preparation and service of school meals, allergen management extends far beyond the kitchen. Every member of the school community has a role in reducing the risk of accidental allergen exposure and ensuring that learners with food allergies are able to participate safely in all aspects of school life.

This procedure establishes the Trust's minimum standards for identifying learners with allergies, communicating dietary information, managing food safely, responding to emergencies and monitoring compliance across all schools. This procedure establishes the Trust's minimum standards for identifying learners with allergies, communicating dietary information, managing food safely, responding to emergencies and monitoring compliance across all schools.

What the Policy Will Achieve

The purpose of this procedure is to establish a consistent Trust-wide approach to the management of food allergies and medical dietary requirements.

The procedure aims to ensure that:

- learners with food allergies are identified promptly;
- suitable Individual Healthcare Plans are implemented where required;
- allergen information is communicated effectively;
- food is prepared and served safely;
- cross-contamination risks are minimised;
- emergency arrangements are effective;
- staff understand their responsibilities;
- legal duties are met;
- learners are able to participate safely in all aspects of school life.

This procedure supports compliance with the statutory duties placed upon academy trusts, governing bodies and school leaders and provides a practical framework for the management of allergen risks across all Trust schools.

1 Policy Scope

This policy applies to every school operated by The Consortium Academy Trust. It applies wherever food is prepared, served, stored, sold or consumed including:

school kitchens;
dining halls;
breakfast clubs;
after-school provision;
food technology;

The procedure applies to:

curriculum activities;
educational visits;
residential visits;
school events;
fundraising events

learners;
employees;
agency staff;
volunteers;

contractors;
visitors;
external catering providers.

Individual schools shall develop local arrangements where necessary to reflect the specific needs of their premises and learners whilst maintaining the minimum standards established by this procedure.

2 Legal and Regulatory Framework

There is no single piece of legislation governing allergen management within schools. Instead, schools are required to comply with a range of legislation covering health and safety, education, equality, food safety, medicines and safeguarding.

This policy has been developed to enable the Trust and its schools to demonstrate compliance with those duties through a coordinated whole-school approach.

2.1 Primary Legislation

Children and Families Act 2014
Health and Safety at Work etc. act 1974
Management of Health and Safety at work Regulations 1999
Equality Act 2010
Food Safety Act 1990
Food Safety and Hygiene (England) Regulations 2013
Food information Regulations 2014
Human Medicines (Amendment) Regulations 2017

Further detail on precise requirements is detailed in Appendix 1

2.2 Statutory Guidance

This policy also reflects the requirements contained within:

- DfE Supporting Learners with Medical Conditions at School
- DfE Allergy Safety in Schools
- Food Standards Agency guidance
- Relevant NHS and Resuscitation Council UK guidance
- Natasha's Law (Prepacked for Direct Sale food)

Compliance with this policy will assist schools in demonstrating that suitable arrangements are in place to meet both their legal duties and recognised standards of good practice.

3 Trust Standards

The Consortium Academy Trust expects every school to adopt a consistent approach to allergy and allergen management. The following standards represent the minimum arrangements required across all Trust schools.

4 Roles and Responsibilities

4.1 Trust Board

The Trust Board has overall responsibility for ensuring suitable governance arrangements exist to enable the Trust to discharge its statutory duties.

The Board will:

- support and approve this policy;
- provide appropriate resources;
- receive assurance regarding compliance;
- review significant allergen-related incidents where appropriate;
- support continual improvement across the Trust.

4.2 Chief Executive Officer

The Chief Executive Officer will ensure suitable management arrangements are implemented throughout the Trust by:

- promoting a positive safety culture;
- ensuring schools receive appropriate support;
- monitoring compliance;
- reporting significant issues to the Trust Board.

4.3 Headteachers

Headteachers are responsible for implementing this policy within their school and ensuring compliance with Section 100 of the Children and Families Act 2014.

Headteachers will ensure:

- learners with allergies are identified;
- Individual Healthcare Plans are implemented where required;
- appropriate risk assessments are completed;
- staff receive suitable information and training;
- the catering provider receives current dietary information;
- emergency policies are understood;
- emergency medication is available;
- records are maintained;
- incidents are investigated and lessons learned implemented.

Operational duties may be delegated; however, overall accountability remains with the Headteacher.

4.4 Facilities Managers

Facilities Managers will support allergen management by ensuring catering facilities remain safe and operational.

Responsibilities include:

- liaising with the incumbent catering providers;
 - reporting defects affecting food safety;
 - coordinating maintenance;
 - ensuring statutory inspections are completed;
 - maintaining kitchen equipment and services;
 - supporting Trust audits where required.
-

4.5 The Catering Providers

The catering providers are responsible for the safe preparation and service of food within Trust schools.

Where uncertainty exists regarding allergen content, food shall not be served until accurate information has been confirmed.

4.6 Employees

All employees must:

- follow this policy;
- undertake mandatory allergen awareness and emergency response training
- understand the needs of learners with allergies relevant to their role;
- avoid practices that may increase allergen risks;
- report concerns immediately;
- follow Individual Healthcare Plans where applicable;
- respond appropriately during emergencies.

Staff supervising food-related activities must ensure allergen risks have been considered before the activity commences.

4.7 First Aiders

Appropriately trained first aiders will:

- recognise signs of allergic reaction and anaphylaxis;
- administer emergency medication where trained and authorised;
- summon emergency medical assistance;
- record the incident;
- participate in post-incident reviews where required.

4.8 Parents and Carers

Parents and carers are expected to work in partnership with the school by:

- notifying the school of allergies and dietary requirements;
- providing current medical information;
- supplying prescribed medication where required;
- ensuring medication remains in date;
- attending Healthcare Plan reviews;
- informing the school promptly of any changes.

4.9 Learners

Where appropriate to their age and understanding, learners should be encouraged to:

- understand their allergy;
- avoid sharing food or drinks;
- inform a member of staff if they feel unwell;
- carry prescribed medication where agreed;
- respect the needs of others with allergies.

Developing independence should be encouraged whilst recognising that responsibility will vary according to age and individual needs.

5 Identification and Management of Allergies

Early identification is essential to effective allergen management. Schools must establish arrangements to ensure allergy information is obtained, recorded, communicated and reviewed throughout a learner's education.

5.1 Admission

Parents and carers will be asked to declare:

- diagnosed food allergies;
- food intolerances;
- medical dietary requirements;
- history of anaphylaxis;
- prescribed medication;
- emergency contacts.

Where significant allergies are identified, arrangements should be agreed before the learner attends school.

5.2 Allergy Register

Each school shall maintain an up-to-date Allergy Register identifying learners requiring additional support.

The register will:

- be reviewed at least annually;
- be updated following notification from parents or healthcare professionals;
- be available to authorised staff;
- be managed in accordance with data protection requirements.

5.3 Communication

Relevant information will be communicated promptly to those who require it, including:

- the catering providers;
- teaching staff;
- teaching assistants;
- lunchtime supervisors;
- breakfast and after school staff;
- first aiders;
- educational visit leaders.

Medical information shall be treated confidentially and shared only where necessary to safeguard the learner.

5.4 Review

Schools will review allergy information:

- annually;
- following changes in diagnosis;
- following changes to medication;
- after an allergen-related incident;
- before residential or educational visits.

Schools will not rely upon historic information without confirming that it remains current.

6 Individual Healthcare Plans

Where a learner has a clinically diagnosed food allergy that requires ongoing management, the school shall prepare an Individual Healthcare Plan (IHP) in consultation with parents or carers and, where appropriate, healthcare professionals.

Healthcare Plans should reflect the requirements of the Children and Families Act 2014 and current Department for Education guidance.

Each Healthcare Plan should include:

learner details and photograph;
confirmed allergens;
symptoms of allergic reaction;
prescribed medication;
location of medication;

emergency policies;
emergency contact details;
reasonable adjustments required;
review date.

Healthcare Plans will be:

- reviewed at least annually;
- updated following significant changes;
- made available to authorised staff;
- considered during educational visits and extracurricular activities.

Schools must ensure emergency medication is readily accessible at all relevant times and that staff identified within the Healthcare Plan understand their responsibilities.

The Trust expects Healthcare Plans to support inclusion by enabling learners with allergies to participate safely in education rather than restricting opportunities.

7 Catering and Food Management

The Trust recognises that the safe management of food allergens depends upon effective partnership working between individual schools and the incumbent catering providers. Whilst the catering providers are responsible for the preparation and service of food, schools remain responsible for ensuring suitable arrangements are in place to safeguard learners with allergies.

Food shall only be prepared and served where accurate allergen information is available and suitable controls have been implemented to prevent cross-contamination.

7.1 General Requirements

The catering providers shall operate in accordance with current food safety legislation, contractual requirements and recognised good practice.

As a minimum, the catering providers must ensure:

- food is sourced from approved suppliers;
- ingredient specifications are maintained;
- allergen information is accurate and current;
- recipes are controlled;
- kitchen staff receive appropriate training;
- food is prepared hygienically;
- cross-contamination risks are controlled;
- suitable cleaning arrangements are maintained;
- refrigeration and storage requirements are monitored;
- any ready-made items bought in for retail purposes are wrapped and allergen labelled
- incidents and near misses are reported promptly.

Where uncertainty exists regarding the allergen content of any food, it shall not be served until accurate information has been confirmed.

7.2 Allergen Information

An up-to-date allergen matrix shall be maintained for all menu items.

The allergen matrix must:

- reflect current recipes;
- be updated following ingredient changes;
- be readily available to catering staff;
- be accessible to schools where required.

Kitchen staff shall never rely upon memory when providing allergen information.

7.3 Cross-Contamination

Preventing cross-contamination is one of the most effective methods of protecting learners with food allergies.

Suitable controls shall include, where appropriate:

- effective cleaning before food preparation;
- segregation of allergenic ingredients;
- clean utensils and equipment;
- suitable hand hygiene;
- controlled food storage;
- clearly identified special meals;
- appropriate supervision during food preparation and service.

Where separate preparation areas are not available, the catering providers shall implement alternative control measures to minimise the risk of contamination.

7.4 Special Meals

Where meals are prepared for learners with diagnosed allergies, the catering providers must ensure that:

- dietary requirements have been confirmed;
- meals are prepared under controlled conditions;
- meals are clearly identified;

- the correct meal is served to the correct learner.

If there is any uncertainty regarding the suitability of a meal, an alternative arrangement shall be made until the matter has been resolved.

7.5 School Responsibilities

Schools shall ensure the catering providers is informed promptly of:

- new allergies;
- changes to Individual Healthcare Plans;
- changes in medication;
- educational visits requiring packed lunches;
- school events involving food.

Regular liaison meetings between Trust and school leadership and the catering providers are recommended to review allergen management arrangements and identify opportunities for improvement.

8 Managing Allergens Across School Activities

Schools must consider allergen risks whenever food is used or provided, not only during meal service.

8.1 Dining Arrangements

Schools must provide appropriate mealtime supervision and an inclusive dining environment. Staff must be aware of learners with significant allergies, discourage food, drink and utensil sharing, supervise younger learners, report concerns promptly and understand emergency arrangements.

Blanket food bans must be used only where supported by an individual risk assessment or medical advice; otherwise, schools must apply proportionate controls.

8.2 Breakfast Clubs and After-School Provision

This policy applies equally to breakfast clubs, after-school provision and holiday activities. Staff must have relevant allergy information, understand emergency arrangements, keep medication accessible and communicate dietary requirements to catering providers where necessary.

8.3 Classroom Activities and Food Technology

Before any classroom or food technology activity involving food, staff must review learner allergies and ingredients, control cross-contamination, arrange suitable alternatives, supervision and cleaning, and confirm emergency arrangements. Activities must be adapted where reasonably practicable so learners with allergies can participate safely. Food prepared by learners must not be shared unless allergen risks have been appropriately managed.

8.4 School Events

For events involving food, staff must consider learners' allergies, food sources, allergen information, safe alternatives and supervision. Food must not be distributed unless ingredient information can be verified; non-food alternatives should be used where appropriate.

9 Educational Visits and Off-Site activities

Learners with food allergies must be supported to participate safely in educational visits and residential activities. Visit Leaders must consider reasonable adjustments in accordance with the Equality Act 2010 and include appropriate controls in the visit risk assessment.

Before the visit, the Visit Leader must:

- confirm current allergy information and Individual Healthcare Plans;
- ensure suitable food arrangements are agreed with catering or residential providers;
- check that in-date emergency medication will remain accessible;
- consider access to emergency medical assistance; and
- brief accompanying staff on individual needs and emergency arrangements.

During the visit, staff must ensure that suitable meals are provided and allergen information is confirmed before food is served. Where food safety cannot be verified, a safe alternative must be provided.

If an allergic reaction occurs, staff must follow the Individual Healthcare Plan, administer emergency medication where appropriate and call 999 immediately if anaphylaxis is suspected. The Visit Leader, school and parents must be informed, the incident recorded, and any lessons learned incorporated into future planning.

A learner must not be excluded from a visit solely because their allergy requires additional planning. Appropriate reasonable adjustments must be considered in accordance with the Equality Act 2010 and current Department for Education guidance.

10 Emergency Response

The Consortium Academy Trust recognises that, despite effective preventative measures, allergic reactions may still occur. Every school shall therefore have clear emergency arrangements to ensure staff can respond promptly and effectively.

All employees should understand that **anaphylaxis is a medical emergency** requiring immediate action.

10.1 Recognising an Allergic Reaction

Symptoms may develop rapidly and vary in severity. Staff should be familiar with the signs of an allergic reaction and seek immediate assistance whenever there is any doubt. Symptoms include:

- swelling of the lips, tongue or throat;
- difficulty breathing or swallowing;
- persistent coughing or wheezing;
- hoarse voice or difficulty speaking;
- widespread rash or hives;
- dizziness or collapse;
- loss of consciousness.

Where anaphylaxis is suspected, staff shall act immediately in accordance with the learner's Individual Healthcare Plan.

10.2 Emergency Policy

Where a severe allergic reaction is suspected:

- Stay with the learner and summon assistance immediately.
- Administer the prescribed Adrenaline Auto-Injector (AAI) without delay where authorised and trained to do so.
- Dial 999 immediately and state that anaphylaxis is suspected.
- If symptoms do not improve and a second AAI is available, administer it in accordance with medical guidance.
- Inform the Headteacher or nominated senior member of staff.
- Contact the learner's parent or carer as soon as practicable.
- Ensure the learner is accompanied to hospital where appropriate.
- Record the incident and retain all relevant documentation.

Where there is any doubt whether symptoms represent anaphylaxis, staff should **treat the situation as an emergency** and seek urgent medical assistance.

10.3 Emergency Medication

Schools shall ensure that:

- emergency medication is stored in accordance with the Individual Healthcare Plan;
- authorised staff know its location;
- medication remains within its expiry date;
- arrangements are in place to monitor expiry dates;
- spare Adrenaline Auto-Injectors are available where the school has chosen to hold them in accordance with the Human Medicines (Amendment) Regulations 2017.

Medication shall be readily accessible during:

- the school day;
- educational visits;
- sporting activities;
- breakfast and after-school clubs;
- residential visits.

10.4 After an Incident

Following any allergen-related incident the school shall:

- ensure the wellbeing of those involved;
- notify parents or carers;
- complete the Trust incident reporting policy;
- review the Individual Healthcare Plan where appropriate;
- investigate the circumstances;
- identify corrective actions;
- communicate lessons learned to relevant staff.

Where appropriate, the Trust Health, Safety and Compliance Team must be informed and support the investigation.

11 Training and Competence

The Trust will provide employees with role-appropriate information, instruction and training to ensure they are competent and confident in managing allergies, in line with the Health and Safety at Work etc. Act 1974 and current Department for Education guidance.

11.1 General Awareness

All employees must complete mandatory allergy awareness training appropriate to their role, covering food allergies, signs of a reaction, emergency procedures, Individual Healthcare Plans, reporting concerns and their responsibilities under this policy.

11.2 Role-specific training

Additional role-specific training must be provided where appropriate for Headteachers, first aiders, catering staff, lunchtime supervisors, educational visit leaders, food technology teachers, and breakfast and after-school club staff. Training must be refreshed periodically and following significant changes to legislation, guidance, local arrangements or incidents.

11.3 Competency

Headteachers must ensure employees undertaking allergy-management duties remain competent through induction and refresher training, practical exercises where appropriate, incident reviews and regular communication.

Mandatory training must be recorded on the Trust CPD platform, with schools retaining records of refresher training.

12 Monitoring, Audit and Review

Monitoring is essential to ensure this policy remains effective and continues to meet the Trust's statutory duties.

The Trust will monitor implementation through its Health, Safety and Compliance arrangements.

12.1 School Monitoring

Headteachers will ensure periodic monitoring of:

- Individual Healthcare Plans;
- Allergy Register;
- emergency medication;
- staff training;
- communication with the catering providers;
- educational visit planning;
- incident records.

Monitoring should form part of the school's normal health and safety arrangements.

12.2 Trust Assurance

The Trust Health, Safety and Compliance Team may undertake:

- school audits;
- compliance inspections;
- document reviews;
- incident investigations;
- thematic reviews;
- performance monitoring.

Findings will be reported to the appropriate Trust management arrangements.

12.3 Review

This policy will be reviewed:

- every two years;
- following significant legislative change;
- following publication of revised statutory guidance;
- following a serious allergen-related incident;
- where monitoring identifies the need for improvement.

The Trust is committed to continual improvement and expects schools to implement lessons learned promptly.

13 Incident reporting

All allergen-related incidents, including near misses, must be reported in accordance with the Trust Incident Reporting Policy and using the IAMCompliant platform.

Incidents should be investigated to determine:

- immediate causes;
- underlying causes;
- adequacy of existing control measures;
- whether Individual Healthcare Plans were followed;
- whether additional training or communication is required.

The purpose of an investigation is to prevent recurrence and improve arrangements across the Trust.

Where appropriate, learning will be shared with other Trust schools.

Appendix One – References

This policy should be read alongside:

Children and Families Act 2014

Health and Safety at Work etc. Act 1974

Management of Health and Safety at Work Regulations 1999

Equality Act 2010

Education Act 2002

Food Safety Act 1990

Food Safety and Hygiene (England) Regulations 2013

Food Information Regulations 2014

Human Medicines (Amendment) Regulations 2017

DfE Supporting Learners with Medical Conditions at School

DfE Allergy Safety in Schools

Food Standards Agency Guidance

Resuscitation Council UK Guidance

Trust First Aid Policy

Trust Educational Visits Policy

Trust Health and Safety Policy

Trust Child Protection and Safeguarding Policy

Appendix Two – Legislation detail

Children and Families Act 2014

Section 100 requires governing bodies and academy trusts to make suitable arrangements for supporting learners with medical conditions, including food allergies and anaphylaxis.

This includes the development of Individual Healthcare Plans, effective communication, emergency arrangements and staff awareness.

Health and Safety at Work etc. Act 1974

Places a duty on the Trust to protect, so far as is reasonably practicable, the health, safety and welfare of employees and others who may be affected by its activities, including learners, visitors and contractors.

Management of Health and Safety at Work Regulations 1999

Require suitable and sufficient risk assessments, competent persons, emergency policies, information, instruction, training and monitoring arrangements.

Equality Act 2010

Requires schools to make reasonable adjustments for learners whose allergies meet the definition of a disability and to ensure that learners are not disadvantaged or excluded because of their medical condition.

Food Safety Act 1990

Requires all food supplied within Trust schools to be safe for consumption and accurately represented.

Food Safety and Hygiene (England) Regulations 2013

Require The catering provider and other food providers to prepare, store and serve food hygienically whilst preventing contamination and maintaining appropriate food safety management systems.

Food Information Regulations 2014

Require accurate allergen information to be available whenever food is provided.

Human Medicines (Amendment) Regulations 2017

Permit schools to obtain and hold spare adrenaline auto-injectors for emergency use where appropriate.

Appendix Three – Caterlink Food Allergen and Intolerance form

Link to form: [CTL - Food Allergy & Intolerance Form V2](#)



ONLINE FOOD ALLERGEN & INTOLERANCE FORM

At Caterlink the safety of our pupils is our number one priority, and we take catering for customers with food allergies and intolerances very seriously.

The below information details how to complete our online form for pupils who require a special diet menu due to allergens, intolerances or medical conditions.

STEP 1 You can request a special diet menu by completing our online Allergy & Intolerance Form – [CTL – Food Allergy & Intolerance Form V2](#)

This needs to be submitted with supporting medical evidence from an NHS professional (a GP/consultant or registered dietitian). This can be a letter, copy of medical notes, an Allergy Action Plan signed by a medical professional or a screenshot from the NHS app. Medical evidence is an industry-wide requirement, recommended by the Lead Association for Catering in Education (LACA).

Please ensure that when you enter the school name that the unit number and postcode listed are correct for your school.

STEP 2 Whilst waiting to see if a special diet menu has been approved any children with food allergies or intolerances can be provided with a 'safe meal' – jacket potato with baked beans, vegetables and fresh fruit salad (if suitable for the pupil's allergies).

If you would like your child to have a 'safe meal' please let your school know.

STEP 3 The Caterlink team will review the request and check that it is safe to cater for using the LACA Special Diet Risk Analysis Process for Caterers where required. The risk analysis looks at the pupil's requirements, the medical evidence, the capability of the kitchen facilities and the school environment to determine if the request is low, medium or high risk.

STEP 4 If deemed safe to cater for by our Caterlink nutrition team will then develop the special diet menu, with at least one suitable meal option daily. This can take up to four weeks from receiving all of the information required.

Should your child's allergies or intolerances change, you should request the link from the school and choose 'Updated Request'.

If your child has become allergic or intolerant to additional foods, please ring the school immediately and request a safe meal.

Appendix Four – Food Safety Policy Statement Robertson Facilities Management



Food Safety Policy Statement

Robertson Facilities Management strive to operate our business in line with our five core principles.

- We listen
- We are professional
- We take responsibility
- We are determined to succeed
- We are one team

We are committed to providing a professional and responsible approach to food safety, through our Food Safety Management System and our procurement and provision of safe and nutritious food with robust allergen management to our customers and business operations.

We listen and recognise that we need to provide services to diverse client groups. These services are based on regularity and industry best practice. We maintain the highest standards of food hygiene and food safety.

Our team's approach to food safety will be based upon hazard analysis principles. We will provide such facilities, information, training, and supervision as needed to ensure standards of food safety are maintained.

All team members will comply with the principles of Robertson Food Safety Management System and that these are implemented and monitored on a regular basis to ensure company and legal compliance.

All Robertson team members will take personal responsibility to ensure that the appropriate policies, practices and procedures are correctly implemented at all times.

We report and investigate incidents, then improve systems and practices aimed at preventing reoccurrence.

Management teams will not only have the responsibility to supervise but also verify performance of Robertson safety standards and seek opportunities for ongoing improvement. We will have independent verification carried out by our external auditing specialist.

This policy will be reviewed periodically to ensure it reflects accuracy and effectiveness in relation to change in legislation.

A handwritten signature in dark ink, appearing to read "A. Mole".

Adrian Mole,
Chief Executive Officer, RFM (Robertson Facilities Management)

May 2026