Ref	PL/005
Version	6

Fatigue Management Policy

This statement sets out the policy of the company for fatigue management; specifically, those activities or tasks identified as 'safety critical work', or where fatigue could result in impaired performance and cause an increased operating risk. This includes works carried out by any employees, agency, contractors, or subcontractors under our control, in compliance with Client and Infrastructure Manager requirements, The Railway and other Guided Transport Systems Regulations (ROGS) legislation and the Network Rail standard NR/L2/OHS/003 Fatigue risk management and its modules. The latter requires that staff undertaking safety critical work and/or working on Network Rail managed infrastructure, assets and systems must not be unfit due to fatigue.

A copy of the relevant standards and legislative requirements are held by the signatory of the policy statement in the main offices of Universal Group, should a fuller interpretation be required and forms the basis for the following synopsis.

Universal Group will take all reasonable measures to ensure that those employees are made aware of the contents of this policy and the effect of their continued employment by the company in the event of any breach of this policy. Universal Group will take all reasonable measures to prevent, so far as is reasonably practicable, any breach of duty placed on any person by this policy by scheduling work patterns and monitoring compliance. If appropriate, this will be done in liaison with the client. Employees of Universal Group will at all times exercise diligence in monitoring their hours worked, including any other/additional employment working, to ensure overall compliance with the limitations detailed below. The company will, where appropriate, conduct fatigue risk assessment and will not, under any circumstance, roster or plan working hours in excess of those defined within legislation and applicable rail industry standards.

The working hours limits, in conjunction with the defined exceedance criteria as defined within NR/L2/OHS/003 are as follows:

- a minimum of twelve hours rest between shifts;
- no more than thirteen shifts in any fourteen;
- no more than twelve hours per shift;
- no more than 72 hours in 7 rolling days;
- no more 14 hours door to door.

Universal Group will not accept any deviation from the above conditions unless emergency conditions prevail, in which case a risk assessment will be carried out to ensure the risks associated with the additional working hours, to those rostered, are suitably mitigated to prevent worker(s) becoming unfit for work through excessive fatigue. No other employment working times should impact on the above to either exceed the limitations or compromise the flexibility of the workforce of Universal Group.

In order to comply with this policy and to maintain the stated and accepted standards of Universal Group employees should at all times:

- Avoid, wherever possible, other employment working times which could impact on the above to either exceed the limitations or compromise the flexibility of the workforce of the company.
- Notify the signatory of this document should other employment working times impact on the limitations outlined.
- Refer to the signatory of this document should a more detailed review of the legislation and applicable rail industry standards be required to ensure full understanding and compliance.

The Risk Assessment process for exceeding working hours in an emergency situation must be in compliance with rail industry standards including Network Rail standard NR/L2/OHS/003 Fatigue risk management and the ROGS 2006 (Railway & Other Guided Transport Systems) (as amended) regulations. The manager responsible for assessing the exceedance shall obtain sufficient information to reliably identify the class of exceedance (if any), design effective mitigations and allocate actions. Records shall be maintained according to the standard.

Only if fully satisfied that the additional working requirement is necessary and urgent and that workers on site have no objections especially safety ones then confirmation can be given to extend the working pattern to tight constraints, with safety as the overriding factor, and with the intent to relieve staff that have triggered an exceedance at the earliest opportunity. Records of the Risk Assessment review shall be recorded including who has been involved in the discussion, the times etc.

In order to prevent staff suffering fatigue as a result of excessive driving requirements, Universal Group will always endeavour to appoint staff who live locally to the work location. Where this is not possible, we will try to limit driving to and from the location of work to 1 hour at each end of the shift.
This policy will be reviewed annually, as a minimum.



Signed
Richard Lowe
Managing Director

Dated 01/11/2026