



# HARDIUM

## Health & Safety Policy

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**Owner:** Director

**Approved By:** David Hardy, Founder & Director

(ISO 45001 Aligned – Nuclear, High-Hazard & Engineering Consultancy)

## 1. Purpose

This policy sets out Hardium's commitment to maintaining the highest standards of health, safety and wellbeing in all our activities. We operate within high-hazard and nuclear environments, and therefore adopt a zero-harm, ALARP, and learning-focused approach aligned with ISO 45001, the UK nuclear safety culture principles, and all relevant statutory requirements.

## 2. Scope

This policy applies to all Hardium employees, associates, secondees, contractors, and partner SMEs engaged in Hardium work across:

- ✓ Nuclear engineering and design
- ✓ High-hazard process and fuel-cycle facilities
- ✓ Consultancy, safety case, and regulatory support
- ✓ Technical advisory and digital engineering services
- ✓ Field visits, client facilities and project sites

It covers all Hardium-controlled activities both on-site and remote.

## 3. Our Health & Safety Commitments

### 3.1 ALARP & Legal Compliance

We meet all applicable UK health and safety legislation, including:

- ✓ Health and Safety at Work etc. Act 1974
- ✓ IRR17 (radiation protection)
- ✓ CDM 2015 (design duties / PD responsibilities)
- ✓ COMAH Regulations
- ✓ PUWER, LOLER, COSHH, DSEAR and PSSR where applicable

We ensure risks are reduced So Far As Is Reasonably Practicable (ALARP) in line with UK nuclear regulatory expectations.

### 3.2 Nuclear Safety Culture

We embed WANO/INPO-aligned values that underpin strong nuclear safety:

- ✓ Personal responsibility
- ✓ Questioning attitude
- ✓ Rigorous and conservative decision-making
- ✓ Clear communication
- ✓ Respect for procedures
- ✓ Learning and continuous improvement

Everyone at Hardium is responsible for maintaining this culture.

### 3.3 Risk Assessment & Safe Systems of Work

We maintain proportionate but robust processes for:

- ✓ Hazard identification
- ✓ Risk assessment (including radiological, chemical, process, and construction risks)
- ✓ Safe systems of work
- ✓ Human factors considerations
- ✓ Change control and impact assessment

We ensure risks are understood, communicated, controlled, and regularly reviewed.

### 3.4 Radiation Protection

Where activities involve ionising radiation, we comply with IRR17 and apply the hierarchy of control:

- ✓ Appointment of an external Radiation Protection Adviser (RPA)

- ✓ Provision of RPS support where required
- ✓ Dose minimisation and monitoring as appropriate
- ✓ Suitable and sufficient radiation risk assessments
- ✓ Local rules and emergency arrangements where applicable

### 3.5 CDM & Design Responsibilities

As designers and consultants, we fulfil our CDM Designer / Principal Designer duties by:

- ✓ Eliminating hazards where possible
- ✓ Reducing residual risk at source
- ✓ Providing clear risk information in design outputs
- ✓ Ensuring designs are safe to construct, operate, maintain and decommission

### 3.6 Competence, Training & SQEP

We ensure all personnel are Suitably Qualified and Experienced (SQEP) for the tasks they undertake.

This includes:

- ✓ Mandatory H&S and nuclear-awareness training
- ✓ Ongoing CPD and technical development
- ✓ Role-specific competence assessment

Partner companies are required to demonstrate equivalent standards.

### 3.7 Incident Reporting & Learning

We encourage open reporting and protect individuals who raise concerns.

We investigate:

- ✓ Near misses
- ✓ Unsafe conditions
- ✓ Incidents and non-conformances
- ✓ Client feedback and regulatory observations
- ✓ Corrective actions are implemented promptly and learning is shared.

## 4. Leadership Responsibilities

### 4.1 Founder & Director (Policy Owner)

- ✓ Sets the H&S vision and provides leadership
- ✓ Ensures adequate resources and competent personnel
- ✓ Approves and communicates this policy
- ✓ Promotes a culture of openness, respect and challenge

### 4.2 Leads and Project Managers

- ✓ Implement safe working practices
- ✓ Conduct and review risk assessments
- ✓ Ensure suppliers/partners meet required standards
- ✓ Communicate hazards and controls clearly

### 4.3 All Personnel & Associates

- ✓ Take reasonable care of themselves and others
- ✓ Follow all Hardium and client safety requirements
- ✓ Challenge unsafe acts and conditions
- ✓ Report concerns immediately and honestly

## 5. Review & Continuous Improvement

This policy is reviewed:

- ✓ Annually, and
- ✓ Following regulatory change,
- ✓ Significant incidents,
- ✓ Audit findings, or
- ✓ Client or stakeholder feedback.
- ✓ Updated versions are communicated to all personnel and partner SMEs.

## 6. Approval

David Hardy

**Founder & Director**

**Hardium Ltd**

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