



PROTECTING THE MAGIC
Health, Safety & Security

MERLIN ENTERTAINMENTS GROUP

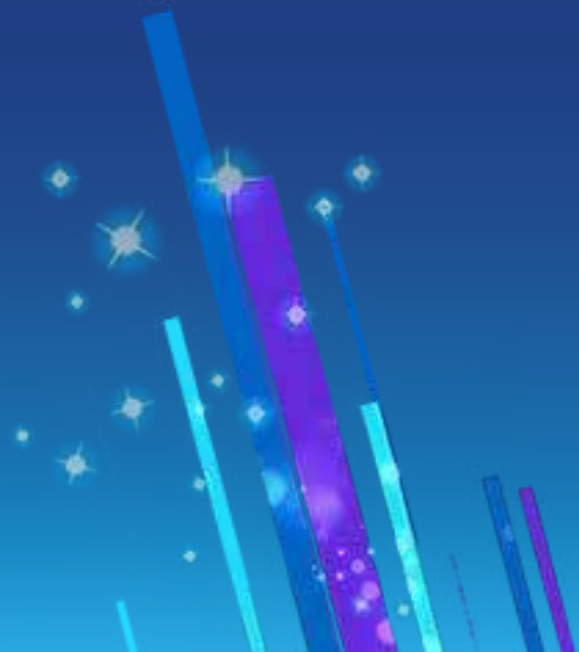
Health, Safety & Security Policy

HS(P)001



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Introduction

Achieving the highest of standards in Health, Safety & Security is a top priority for Merlin Entertainments.

We're proud of the processes, systems and procedures we have in place across our business and of the huge team of people who care deeply about keeping our guests, colleagues and contractors safe.

Our commitment to Health, Safety & Security is as much a part of our company culture as our dedication to putting smiles on people's faces.

We appreciate that we can never take Health, Safety & Security for granted, or become complacent in this area.

That's why we're continually working to identify and deliver new ideas for improving our processes and standards.

Through this focus on innovation, best practice and continuous improvement our restless ambition is to ever reduce risk for our guests and people.

We call this relentless focus on Health, Safety & Security:

“Protecting the Magic”



SECTION I

Policy Statement

HEALTH, SAFETY & SECURITY POLICY





POLICY STATEMENT

Merlin Entertainments Group (hereafter referred to as Merlin) runs Europe's largest collection of visitor attractions and the second largest worldwide. It aims to provide unforgettable experiences to the millions of people who visit its ever-expanding group of attractions and theme parks each year. Merlin is committed to achieving the highest standards of Health, Safety and Security and to protecting all its visitors, employees and on-site contractors around the world.

This determination lies behind the actions taken by Merlin to incorporate Health, Safety and Security (HSS) into every aspect of the Company. HSS is the number one priority. It is integrated both within the training given to employees and also their daily working practices. It is engrained within the Company's culture, and it is central to its values. These values – 'The Merlin Way' – place Merlin's employees at the heart of everything it does, including HSS. The Merlin Way encourages each person to take ownership, responsibility and to be fully involved in safe working practices.

This is particularly important in the fields of Health, Safety and Security because keeping people safe depends on everybody playing their part in full. This reality underpins 'Protecting the Magic', Merlin's HSS programme that is dedicated to: a) increasing awareness and engagement and b) promoting and then sustaining a positive, proactive, culture of 'safety first'.

'Protecting the Magic' is designed to help management teams, employees and business partners identify and manage risks, prevent accidents and deliver unforgettably magical guest experiences. It tells everyone what to do, how to do it and why their actions help keep people safe. It means that they can all play an essential role in looking after the guests, colleagues, contractors and the animals in their care.

Supporting this are systems and procedures that help people assess, eliminate or control risk effectively, and that promote a strong and sustainable base of HSS expertise across Merlin worldwide.

Merlin's mission is clear – to always ensure that it is 'Protecting the Magic' every day with world class people and practices. This is achieved in several ways:

- Complying with relevant legislation (at a minimum), as well as Merlin's mandatory standards and other requirements that it has adopted.
- Using robust systems to identify and control risks effectively.
- Giving staff the information, instruction, training and supervision they need to carry out their roles competently.
- Speaking with employees, their representatives and others about HSS issues.
- Investigating and learning lessons from near-misses or incidents that take place both inside and outside the Company.
- Regularly monitoring, auditing and reviewing Merlin's HSS management system and associated safety performance.
- Working with other organisations to improve HSS standards across the sector.

Every level of management at Merlin is responsible for putting this HSS Policy into practice. Merlin's Executive Board is committed to providing enough resources and investment to support the Policy and ensure that everybody knows and understands it.

Ultimately, however, safety cannot be delegated completely. Merlin always encourages creativity and initiative, and promotes a 'best practice' culture where everybody understands their own individual HSS responsibilities and is actively committed to making this Policy work in practice.

This Policy outlines Merlin's approach, responsibilities and actions centred on HSS and explains how this is managed across every activity, whether at its attractions, production facilities or corporate offices. It describes Merlin's HSS management system and its arrangements for Protecting the Magic, as well as the responsibilities of Merlin's Executive Board, Directors, line managers, HSS professionals and all employees. Detailed procedures covering all HSS arrangements are available in separate procedural, guidance or advisory documents and other safety publications issued and controlled by each local attraction, production facility or office location as well as by central functions including the Group HSS Department and Human Resources.



Scott O'Neil
Chief Executive Officer



SECTION 2

Objectives

HEALTH, SAFETY & SECURITY POLICY



OUR MISSION

Protecting the Magic* every day with world-class people and practices.

*Our attractions, everyone's safety.

Fulfilling The Mission

Merlin has developed the following six strategic initiatives to help achieve its stated mission and world-class HSS performance.

LEADERSHIP AND ENGAGEMENT:

Requiring leaders to exhibit visible, proactive and unwavering leadership towards HSS, supported by employees who are fully engaged with this shared responsibility.

MONITORING AND ASSURANCE:

Assessing and critically reviewing its performance, in a balanced and objective manner; in order to understand, improve and sustain Merlin's HSS performance.

LEADERSHIP AND ENGAGEMENT

COMPETENCY AND CULTURE

COMPETENCY AND CULTURE:

Fostering a proactive and self-monitoring safety culture, with competent and talented people focussed on the effective management of HSS risks.

ASSETS AND EQUIPMENT:

Managing assets and equipment to ensure they are fit for purpose throughout their life-cycle such that no unacceptable or uncontrolled HSS risk is created.

MONITORING AND ASSURANCE

ASSETS AND EQUIPMENT



STRATEGIC INITIATIVES

STANDARDS AND PROCEDURES

ASSESSMENT AND CONTROL OF RISK

ASSESSMENT AND CONTROL OF RISK:

Identifying, understanding and controlling HSS risks effectively so that the greatest effort and resource is placed on the most material risks, whether existing or emerging.

STANDARDS AND PROCEDURES:

Developing and rigorously implementing clear and suitable standards and procedures for safe designing, constructing, maintaining and operating.

ACHIEVING WORLD-CLASS HSS PERFORMANCE

Merlin is committed to upholding HSS standards that are best in class, are clearly understood and fully implemented across the Company. This commitment manifests itself in a number of ways:

Safety leadership walks

On-site walks, both front and back of house, by senior leaders in the business where dedicated time is spent talking with staff about HSS matters and understanding what more can be done.

Training

Rigorous training and instruction is fundamental to Merlin's approach to HSS across the business, with mandatory new starter training for all employees and safety leadership training for managers.

Risk assessments

Feasibility Risk Assessments and Operational & Use Risk Assessments provide a structured methodology for risk identification, elimination or control for new rides and hotels.

Construction

Every Merlin construction project worldwide adheres to best-in-class standards. By way of example, when constructing new LEGOLAND Parks, Merlin's project team works closely with other LEGOLAND resorts to share best practice and to make sure the parks open smoothly, with adherence to the strictest of HSS standards.

Maintenance

Robust maintenance systems and procedures comprise daily, weekly, monthly and annual maintenance programmes across Merlin's rides, buildings, facilities and estates. Additionally, investment in a global Enterprise Asset Management (EAM) system from INFOR helps improve asset performance still further.

Ride inspections

Thorough inspections conducted at least annually by independent inspection bodies on each ride complement Merlin's internal maintenance and inspection regimes.

Fire safety

Proactive fire engineering surveys of Merlin's hotels help ensure that the Company continues to uphold the highest of physical and procedural controls at all of its hotels, regardless of their age.

Food safety

Merlin adopts the best practice system of Hazard Analysis and Critical Control Points (HACCP). It ensures traceability and assurance over food produce sourced and supports guests in their choice of products based on their specific dietary and allergy requirements.

Security

Merlin takes any threat to the security of its attractions and business operations very seriously, and this includes terrorism, violence and criminality in all their forms. The Company therefore has in place protective measures, both overt and covert in nature, to help address these risks.

Such active and passive security protocols are deployed to ensure the integrity of its physical boundaries and the operations and assets within. Strong partnerships with local law enforcement agencies are also maintained.

The Company trains all employees to stay alert and to know what to do in an emergency.

Weather

Extreme weather events, such as hurricanes and heatwaves, are a growing threat. Merlin manages such events through a combination of strategic thinking, teamwork, clear communication, effective response planning and an understanding of their broader context.

Auditing

Merlin's 'Triple Lock' audit programme provides for a thorough and objective evaluation of compliance levels across the Company; its adoption of a closed-loop action tracking system allows for the active management of any necessary enhancement works.

The background of the page is a composite image. The top half shows a dark, atmospheric scene of a roller coaster with a gothic-style castle in the background under a stormy sky with lightning. The bottom half shows a person's face in profile, looking upwards with an expression of awe or excitement, as if they are on a ride. The text is overlaid on a semi-transparent purple and blue geometric shape that cuts across the middle of the image.

EXTERNAL GUIDANCE

We work with industry partners, both nationally and internationally, to design and set new safety standards and requirements.

We are active members of the British Association of Leisure Parks, Piers and Attractions (BALPPA), the International Association of Amusement Parks and Attractions (IAAPA) and the American Society for Testing and Materials (ASTM).

We frequently liaise with other organisations, including those who have regulatory or advisory expertise, to support or monitor our Health, Safety and Security programme. In particular we work closely with:

- Health and Safety Enforcement Agencies.
- Public Health Inspectors.
- Police and Law Enforcement Agencies.
- Local Emergency Services.

Monitoring HSS performance

Merlin runs regular reviews of its HSS performance. These reviews are carried out by each attraction, by the Senior Leadership Team of every Operating Group, and by the various HSS Committees. These groups then share any best practice learning with management teams.

All of Merlin's attractions are subjected to three kinds of routine HSS reviews: annual self-audits, independent internal audits and periodic independent external audits. Attractions also receive pre-opening and post opening inspections, and focus topic audits. In addition, the Company operates a comprehensive programme of specialist audits in areas such as ride safety, fire safety and food safety.

Reviews use two forms of performance metric:

- Leading indicators: these monitor the activities Merlin undertakes as part of its HSS governance and monitoring processes. This approach includes arrangements by attractions for near-miss/unsafe condition reporting, trend analysis and corrective action management.
- Lagging indicators: these capture near-miss and incident rates for both guests and employees.



SECTION 3

Governance

HEALTH, SAFETY & SECURITY POLICY



HSS GOVERNANCE & COMMITTEE STRUCTURES

The diagram below illustrates the framework of governance forums designed to control and co-ordinate HSS matters at Company, business unit and site levels. The structure is sufficiently robust to monitor Merlin's HSS performance and direct improvements across its business operations worldwide.



PLC Board

The Company's Board has overall responsibility for corporate governance. This includes overseeing Merlin's risk management activities, setting and approving strategic objectives and defining Merlin's appetite for risk. In addition, it monitors existing risks against the Group's strategy and provides any necessary direction. The Board meets at least six times each year and is chaired by Merlin's Group Chairman.

HSS Committee of the PLC Board

Board members, Merlin's Executive Committee and the Group Director of HSS attend this committee, which is chaired by the Group Chairman and reports to Merlin's PLC Board. It identifies and assesses important HSS matters and develops HSS standards, policy and strategy. It also shares best practice, reviews Merlin's HSS performance and reinforces HSS leadership and communication worldwide. It meets at least four times each year.

Operating Group HSS Committees

Each Merlin Operating Group has its own HSS Committee, chaired by the Operating Group's Managing Director or HSS Director and attended by the relevant attraction General / Senior Managers. These committees meet every quarter to review and direct the HSS management arrangements and performance of the different sites and operations for which they are responsible. These committees are linked to the HSS Committee of the PLC Board through representation of Managing Directors / HSS Directors.

Attraction / Department Safety Forums

Specific attractions, departments and regions have established their own safety forums. These meet frequently (often weekly or monthly) across Merlin's different businesses. Many are run by local in-house HSS experts, who report to their HSS Directors and, ultimately, to Merlin's Group HSS Department.



SECTION 4

Responsibility

HEALTH, SAFETY & SECURITY POLICY



THE IMPORTANCE OF SAFE WORKING PRACTICES

is engrained throughout Merlin's culture and values, as is the recognition that HSS is the responsibility of all who work here, regardless of their position or role.

Company level

Ultimate responsibility for HSS at Merlin rests with the Chief Executive and Board. The Group Chairman and Chief Executive are responsible for authorising Merlin's HSS Policy Statement, while responsibility for the development of HSS Policy and its standards is delegated to the PLC Board HSS Committee.

Business unit level

Merlin's HSS Policy applies to every business unit where Merlin has operational control. Line managers at all levels, supported by in-house HSS professionals, are responsible for HSS matters.

The following sections describe how specific management and employee HSS responsibilities are assigned throughout the Company.

Executive Committee / Managing Directors / Directors of Functions

These senior executives are accountable to the Chief Executive with regards to their duty to effectively implement Merlin's HSS Policy, management system and related standards within their areas of responsibility. In particular, they must:

- Demonstrate a clear commitment to HSS and display visible leadership. This includes setting a good personal example, attending/chairing Operating Group HSS Committees or other relevant bodies, and explaining how HSS considerations affect their business decisions.
- Decide how best to carry out Merlin's HSS Policy and management system, as well as any relevant actions agreed by the PLC Board HSS Committee.
- Set HSS targets for their business that meet Merlin's overall objectives and the needs of each attraction / business.
- Monitor HSS performance and regularly review the effectiveness of every aspect of the Company's HSS management system.



Directors / Heads of Service / Managers

Every manager is responsible for implementing Merlin's HSS Policy, management system and related standards.

Within their own area of management responsibility, they must:

- Show clear leadership and commitment to HSS; this includes setting a good personal example.
 - Develop plans that are consistent with the HSS strategy to carry out risk assessments and meet relevant standards, legal requirements and Merlin's HSS targets and objectives.
 - Take the necessary practical steps to implement the HSS management system, including:
 - Providing suitable resources and training.
 - Defining specific roles and responsibilities.
 - Explaining HSS issues effectively.
 - Establishing operational controls.
 - Managing contractors effectively.
 - Organising emergency response arrangements.
 - Implement measures to monitor HSS performance and, where necessary, take corrective action. This includes audits, performance monitoring, and reporting / investigating incidents.
 - Ensure that HSS decisions are consistent with Merlin's HSS Policy.
 - Consider HSS issues in business decisions and explain their importance.
 - Support promotional campaigns and educational plans.
 - Recognise and reward employees who show positive HSS behaviour and achieve HSS objectives.
 - Discuss HSS issues regularly.
 - Encourage employees to suggest measures to improve HSS performance, and follow these up.
 - Ensure that employees who blatantly or repeatedly violate HSS standards, procedures and rules are disciplined appropriately.
 - Challenge unsafe conditions or actions and work with those involved to agree the necessary safety improvements.
 - Provide ready access to skilled HSS professionals and / or accurate HSS advice.
- 

Appointed Persons

The Appointed Person is the most senior manager at any Merlin attraction or business; for example, the Divisional Director, General Manager or Attraction Manager.

Within that attraction, he/she is responsible for implementing Merlin's HSS Policy and management system.

The Appointed Person is expected to carry out the duties of Directors/Heads of Service/Managers outlined above. In addition, they / their teams must:

- Establish and promote a positive, pro-active safety culture across their attraction/business.
- Comply with Merlin's HSS Policy and its standards and relevant legal obligations.
- Allocate sufficient resources, including time and money, to meet HSS performance standards.
- Ensure that employees at all levels are competent in HSS matters.
- Establish suitable emergency/crisis management plans and rehearse these regularly.
- Provide employees with the necessary HSS training for their specific roles.
- Complete an appropriate number of risk assessments, review them thoroughly and implement any resulting risk reduction measures in a timely way.
- Establish and record systems of safe working practices / operating procedures and inform all relevant staff and contractors.
- Consult staff regularly about HSS issues by using employee forums, works councils or similar bodies.
- Develop, review and achieve successful annual site HSS plans and risk registers.
- Record, report and investigate all HSS incidents to identify how and why they occurred and how best to prevent similar problems in the future.
- Participate in site audits, inspections, leadership walks and safety committees or forums.

Group HSS Director

The Group HSS Director at Merlin is responsible for maintaining a Senior Leadership Team of HSS professionals. This team should:

- Develop an HSS strategy that will achieve Merlin's HSS mission, strategic initiatives and targets, and then facilitate its implementation.
- Put in place the Company's HSS Policy, management system and associated standards and ensure these are implemented.
- Provide specific training, support and professional advice to employees at all levels.
- Carry out Merlin's triple-lock HSS audit programme.
- Promote Merlin's profile as a leader in HSS matters by participating in relevant industry forums.
- Manage and support local and regional HSS teams.
- Support and liaise with all levels of attraction / business management.



Local / Regional HSS Teams

Every attraction or business unit must appoint or engage a sufficient number of HSS professionals to support them. Such local / regional HSS teams are expected to:

- Increase awareness of Merlin's HSS vision, objectives, targets and strategy.
- Provide guidance to other employees about the most effective ways to implement Merlin's HSS Policy, management system and associated standards.
- Help establish programmes that will enable colleagues to meet HSS targets and strategic initiatives.
- Understand typical HSS hazards, be able to identify them in the workplace and support the risk management process.
- Advise colleagues how best to observe relevant laws in a proportionate way.
- Design and deliver HSS training.
- Plan and carry out HSS inspections and audits.
- Advise on and support incident investigations.
- Provide informed advice about relevant HSS and technical matters.
- Help managers develop effective working relationships with the appropriate authorities.
- Monitor and influence external HSS developments.
- Support the Group HSS function and any due diligence processes as required.

Employees

HSS at Merlin is the responsibility of all staff, so every employee has a duty to themselves, their colleagues and Merlin's guests to work safely at all times.

This means that they are expected to:

- Follow established safe working practices and controls, use any personal protective equipment they are issued with, and abide by all relevant HSS rules and standards.
- Report immediately any HSS incidents, including unsafe acts or conditions, near-misses and injuries.
- Suggest any ideas they have for HSS improvements to their manager.
- Support Merlin's measures to improve HSS performance.
- Participate in HSS training, campaigns and initiatives.
- Co-operate with health screening and surveillance as required.

If any employee feels that their HSS concerns have not been properly addressed locally, they should inform the Group HSS team, the Group HSS Director, the Human Resources department or the Whistleblowing Hotline.



Business Partners & Contractors

High HSS standards are a fundamental element of Merlin's relationship with third-party business partners and/or contractors. Robust HSS performance is one of the key elements taken into account when awarding contracts.

Applicants are required to explain and verify their HSS management systems and practices, and to provide details about how they will comply with Merlin's expectations and the legal requirements where they work.

Merlin ensures that every project is established in such a way as to enable contractors to complete their work safely and to the correct standards. Merlin's project managers, HSS teams and external consultants conduct site inspections and audits to make sure that contractors consistently meet the Company's rigorous HSS standards.

Merlin's project management systems also allow for regular feedback on any HSS issues, incidents or challenges. In addition, suppliers and contractors are required to have suitable measures in place to keep their employees, visitors, guests and neighbours healthy, safe and secure.



360° safety

Engraining HSS throughout Merlin's culture and values means prioritising safety at every stage of operation, including design and construction through to daily operations. 'Protecting the Magic' at every stage enables Merlin employees to work in a way that is safe and secure, both for themselves and all visitors. On many occasions, 'Protecting the Magic' starts with Merlin Magic Making (MMM) – teams who find, create, produce and deliver new attractions and experiences.

As soon as planning begins for a new experience or attraction, MMM teams research local HSS laws and how closely they align with Merlin's own global standards.

They then establish and use a local network of experienced and trusted professionals and organisations to fully understand construction practices in that location and source high quality local contractors who will work to the safety standards required.

For specific rides and experiences, Merlin personnel ensure that safety features are a fundamental consideration during the design phase and are implemented during their construction. Merlin staff control and carefully monitor the construction and manufacturing processes to ensure the completion of every aspect, including safety systems, to the highest of standards. During this stage, they will conduct inspections and quality assurance checks themselves, and/or hire independent inspectors to do these on their behalf.

Once a ride or attraction has been completed and installed, it receives a series of rigorous inspections and tests to ensure that it fully meets the original design specifications and standards and can be operated safely. For example, new rides undergo a schedule of detailed tests and inspections from an independent inspection body to ensure that all the safety features work properly and that the work meets the required standards. Merlin teams then manage the commissioning, training and handover processes that address relevant HSS issues so that they can be sure that all attractions continue operating at the highest standards.

After a ride becomes operational, a large team of Merlin engineers ensures that they continue to run safely. Every engineer is given ride-specific training and their individual performance is continually appraised through shadowing, performance monitoring and auditing. In addition, Merlin teams receive continued technical support and assistance from the ride manufacturers to help them keep the rides reliable and in excellent condition throughout their life.

Beyond this expertise, the Company prepares a series of detailed procedures, such as Codes of Safe Working Practice, to help ensure that regular maintenance is always completed properly and safely. Such procedures always include pre-use inspections for new rides and testing, emergency planning and ride evacuation routines.

HSS: A RESPONSIBILITY SHARED BY ALL

Every Merlin employee is aware of their duty to promote the highest standards of HSS. In addition, some roles involve specific HSS responsibilities:



Engineers are expected to prioritise HSS throughout the design, development, construction, installation and maintenance of every attraction and ride.



Ride operators are responsible for the safety of everybody enjoying Merlin's rides and attractions. Every day, they complete safety checks before rides go into use and check that rides continue to operate properly throughout the day.



Facilities maintenance teams prevent problems by taking responsibility for the essential services at Merlin attractions and venues so that every employee, worker and visitor has everything they need.



Rides rescue teams are specially trained to help unload guests quickly and safely from a ride that has broken down.



Safety professionals are based in Merlin sites across the world to help every employee understand what they should do to help Protect the Magic.



Lifeguards are responsible for supervising the safety of everybody using the Company's waterparks and swimming pools. Every lifeguard is a very strong swimmer, trained in first aid and certified in a variety of water rescue equipment.



Security teams protect all guests, animals and property so that every visit to a Merlin attraction is fun, safe and secure.



Medical teams care for anybody who requires first aid treatment or feels unwell, and understand the importance of doing this quickly and competently.



Ski instructors promote ski safety at all times and aim to get guests having fun on the slopes as quickly and safely as possible.



Ride manufacturers help to develop and build world-class rides that never compromise safety for excitement.



Zoologists study the animals and wildlife in Merlin's care to ensure that they are in a suitable environment and keep any human interactions as safe as possible.



SECTION 5

Control Arrangements

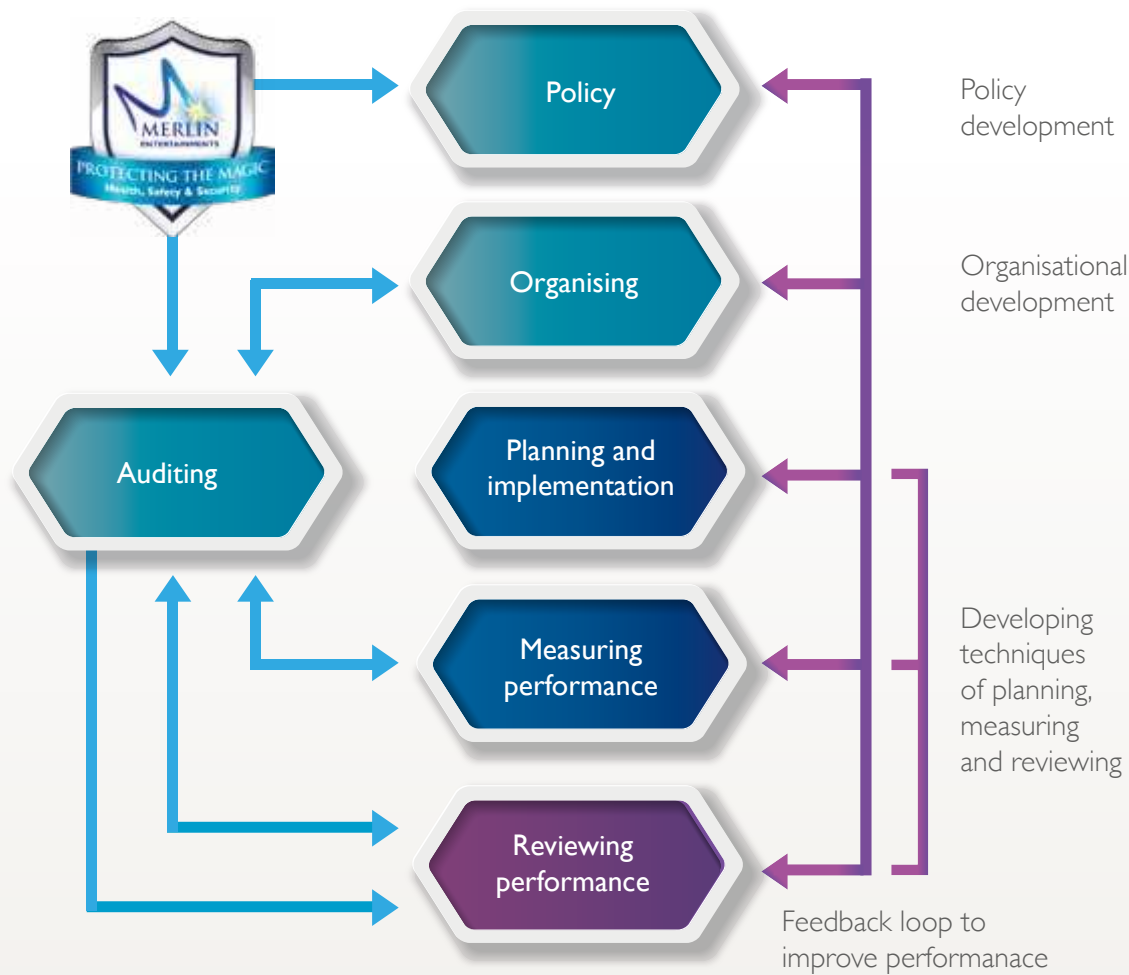
HEALTH, SAFETY & SECURITY POLICY



MERLIN'S HSS MANAGEMENT SYSTEM

Merlin's HSS management system and associated HSS policies, standards and guidelines help the Company achieve the required level of HSS performance. Its HSS Manual and Global Engineering Standards combine the main elements of the HSS management system and are supported by Merlin's 'Protecting the Magic' programme that integrates a 'safety first' culture across the Company.

The management system co-ordinates the way HSS issues are dealt with across all business operations worldwide. The diagram below shows its main elements which, with Merlin's Strategic Initiatives, are used to drive continual improvement in HSS.



This second diagram demonstrates how this system is applied at different levels of the business:

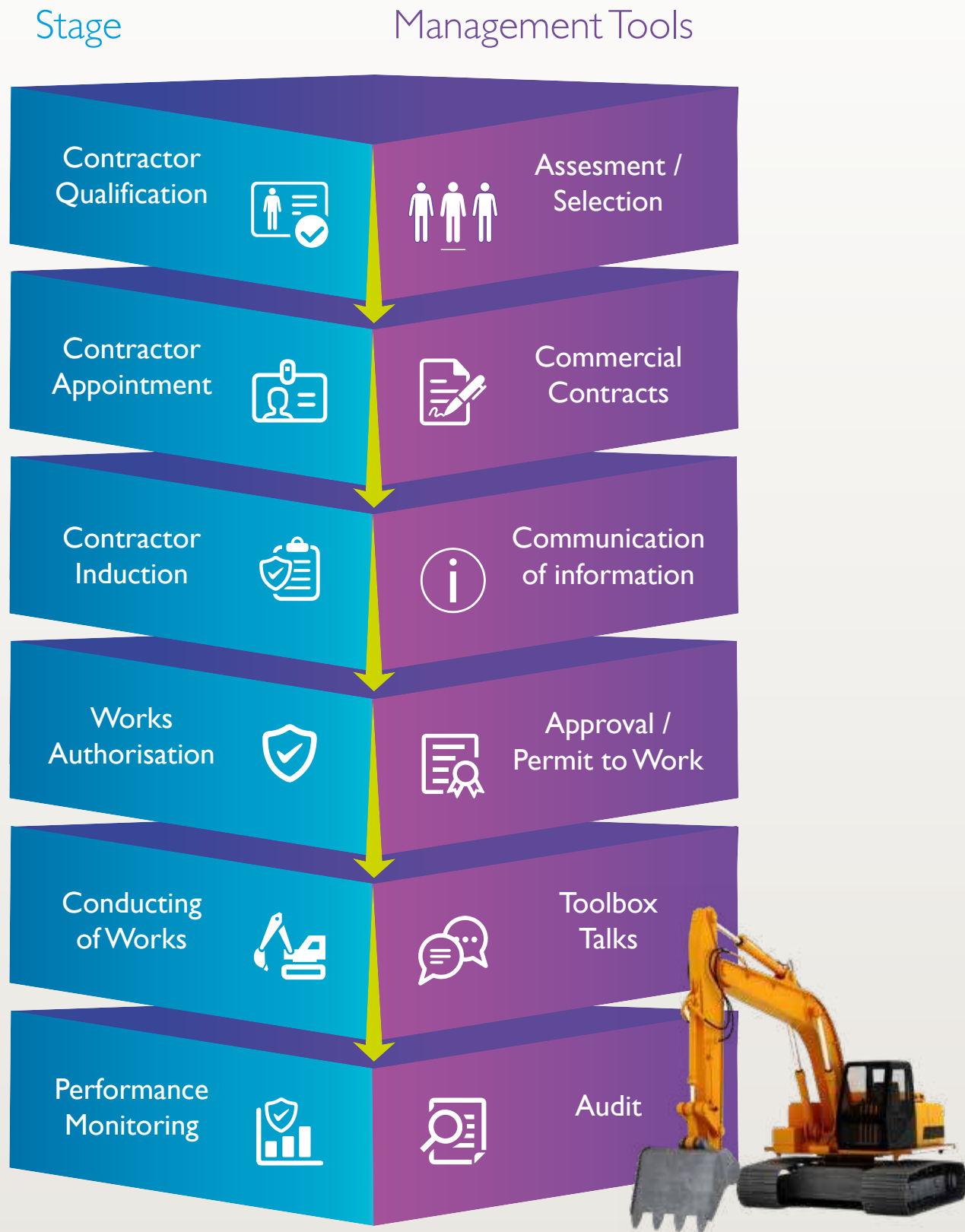


CONTRACTING COMPANIES

All works and/or contracts taking place on Merlin sites that involve outside contractors are the responsibility of a Merlin Manager; who ensures that they follow Merlin's HSS rules and procedures.

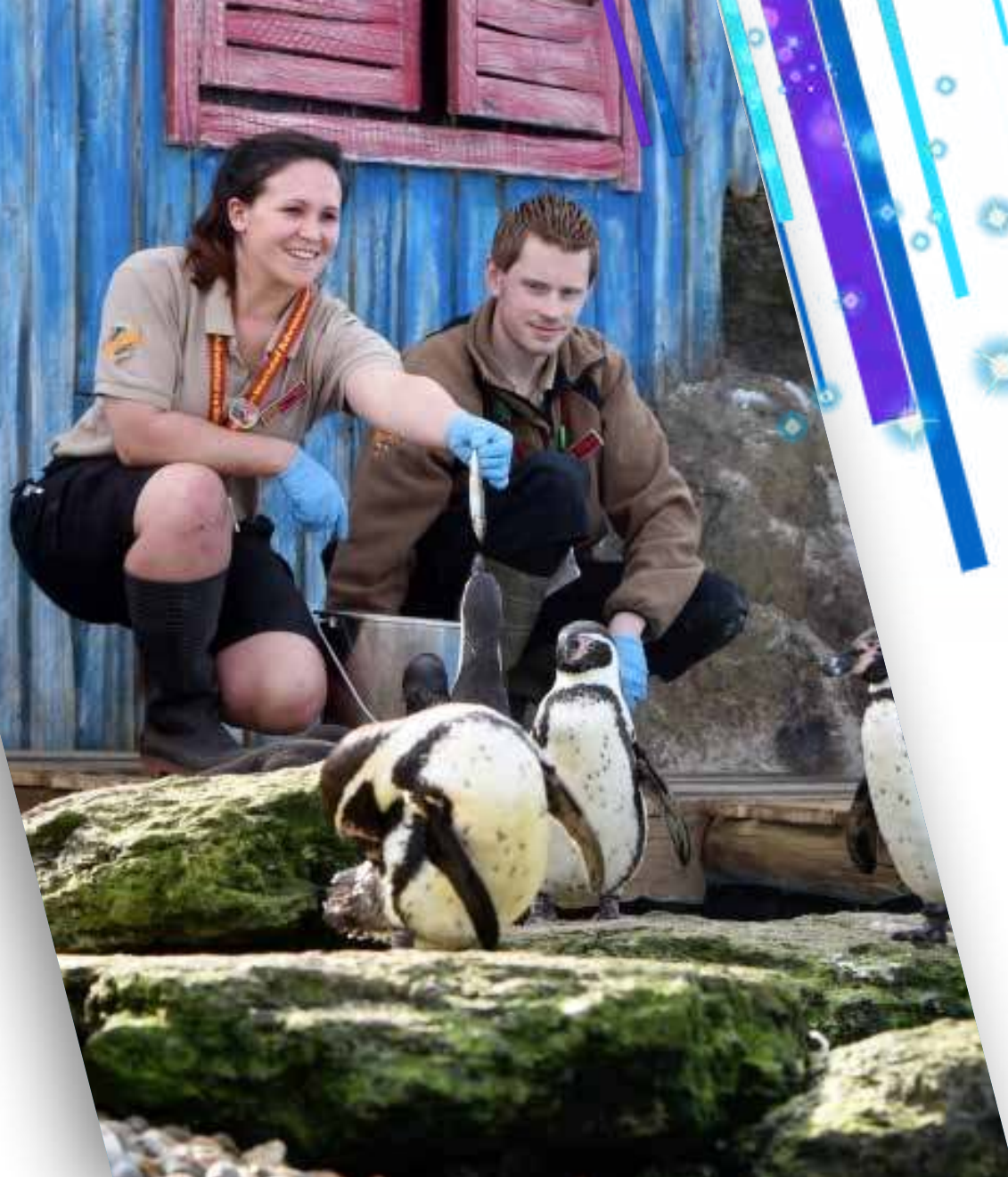
The Merlin Manager can be any employee in a management position, or a third party appointed by Merlin to hire contractors.

The diagram below illustrates the HSS process used by Merlin Managers to control contractors effectively.



A Merlin Manager briefs successful contractors about the Company's HSS requirements before or on arrival at the relevant attraction or site, and makes it clear that all contractors must adhere to these requirements.

The Merlin Manager also tells contractors about any extra, site-specific safety and security rules, or special arrangements for their induction and works approval.



Attraction / site information

The Merlin Manager is responsible for telling contractors everything they need to know about any safety hazards resulting from any on-site operations or activities. They will share that information with contractors at a time that enables them to play their part in keeping guests, employees and others secure and safe on the relevant attraction or site.

In addition, contractors are encouraged to examine relevant reference documents, such as:

- Site drawings and plans.
- Risk assessments.
- Codes of Safe Working Practice / Safety Procedures.
- Building / Operations Manuals (where relevant).
- Any other useful information, such as times of fire alarm tests, evacuation procedures, signing-in procedures, first aid information and security procedures.



Processes & Procedures

Across the world, every Merlin attraction has its own clear and comprehensive HSS plan or programme, which fulfils several important functions:

- It describes the priority attached to all HSS matters.
- It outlines the measures in place at the site to manage HSS risks.
- It details the key HSS roles and responsibilities of the site's leadership team.
- It explains the HSS-related responsibilities of every employee at that attraction.

Management teams at each attraction are supported by HSS specialists, who undertake two main activities that form part of Merlin's overall approach.

1. Risk Registers: these are used to continually identify, assess and manage safety / security risks. Each year, every attraction develops a comprehensive Risk Register, which its management teams use to focus on the necessary safety risk controls and the attraction's safety priorities for the year ahead.

2. Action Plans: every year, these are prepared by the attraction's leadership teams.

The Action Plans are influenced by various sources of information, including:

- The attraction's Risk Register.
- Routine and annual safety inspections and audits.
- Any near-miss or incident investigations.
- Employee feedback.

Action Plans may result in extra HSS arrangements being put in place and monitored against the plan.

In addition, HSS priorities are integrated within Merlin's broader management objectives, so that good management performance is defined by achieving excellent health and safety standards.

Every attraction also has specific HSS management systems. These contain essential conditions of safe working, such as:

- Planning activities.
- Safety procedures or Codes of Safe Working Practice for every ride.
- Safety instructions and other rules or assessments.
- Relevant safety training.



Ride Maintenance & Inspections

Ensuring that rides at Merlin's attractions always operate safely is a key element of 'Protecting the Magic' and requires a rigorous approach to safety engineering. In turn, this is reliant on highly skilled and specialist technicians and engineers.

Every attraction and ride has a series of robust maintenance systems and procedures. Typically, these involve a comprehensive set of daily, weekly, monthly and annual maintenance works.

The maintenance programme for each ride is derived from the requirements set out in the ride manufacturer's operating and maintenance manual. Merlin staff then add any extra tests or inspections that continued use and examination of the ride have identified as necessary.

Every day, inspections are conducted on every ride's safety-critical components, such as its brakes, emergency devices and passenger restraints. On completing the inspection, the ride is signed off as safe for use and handed over to the operations team to carry out pre-opening checks.

Complementing the daily inspections is regular, planned maintenance. The details and frequency of such maintenance varies according to the ride, but the work can be completed either out of operating hours or during the day – for example, if a ride vehicle goes to the workshop for its scheduled inspection and service.

Other HSS inspections take place in reaction to specific events, for example if a ride stops unexpectedly. An event like this can happen for a variety of reasons, such as a guest's behaviour activating an emergency stop, or a ride's computer control system reporting a fault. Engineers on site are fully versed in every technical aspect of the ride and are therefore well-placed to investigate and resolve the issue. A series of safety checks are then followed before the ride goes back into operation.

Merlin engineers and technicians also complete Annual Maintenance and In-service Inspections. These involve shutting the ride down and taking it out of service completely. This usually happens in early autumn in theme parks with a limited season, while for attractions that are open all year round it is done in rotation. Before the work takes place, a thorough programme establishes how much 'strip down' and 'non-destructive testing' is required, and whether the work can be carried out in-house or needs assistance from third-party specialists.

In-service inspections require an independent, expert Inspection Body to check a ride's condition and suitability every year for continued safe use. These inspections include close examination of all safety-critical parts. Merlin's engineers are responsible for stripping each ride down and making the relevant parts ready for the independent inspection and non-destructive testing. The engineers also use In-service Inspections as an opportunity to complete Annual Maintenance, working on each ride according to its manufacturer's recommendations and replacing parts as necessary.

Once a ride has passed its In-service Inspection, Annual Maintenance and function tests, the Inspection Body will issue a safety certificate. Typically, this is valid for 12 months, although the process can vary slightly in different countries.

Besides these scheduled works, Merlin's engineers regularly review all rides and work with manufacturers and Inspection Bodies to make 'Reliability Improvements' that increase the productivity, reliability and active life of different rides. The reviews may also result in adjustments to the maintenance schedule of a particular ride so that it continues to perform as safely as possible.



SECTION 6

Measurement

HEALTH, SAFETY & SECURITY POLICY



PERFORMANCE INDICATORS & TARGETS

The HSS Committee of Merlin's Board agrees annual HSS performance indicators and targets for the Company.

These are then sent to attractions and business units and achieved by implementing the relevant improvement programmes.

The aim of the indicators and targets is to achieve continual improvement in Merlin's HSS performance. This is reviewed annually through a combination of both leading and lagging indicators.

Additionally, Merlin expects individual attractions or business units to use their annual HSS plans and risk registers to set extra 'SMART' targets that suit their specific needs and activities. Individual attractions or business units may also set more stringent HSS targets for themselves if these are relevant and cost-effective.

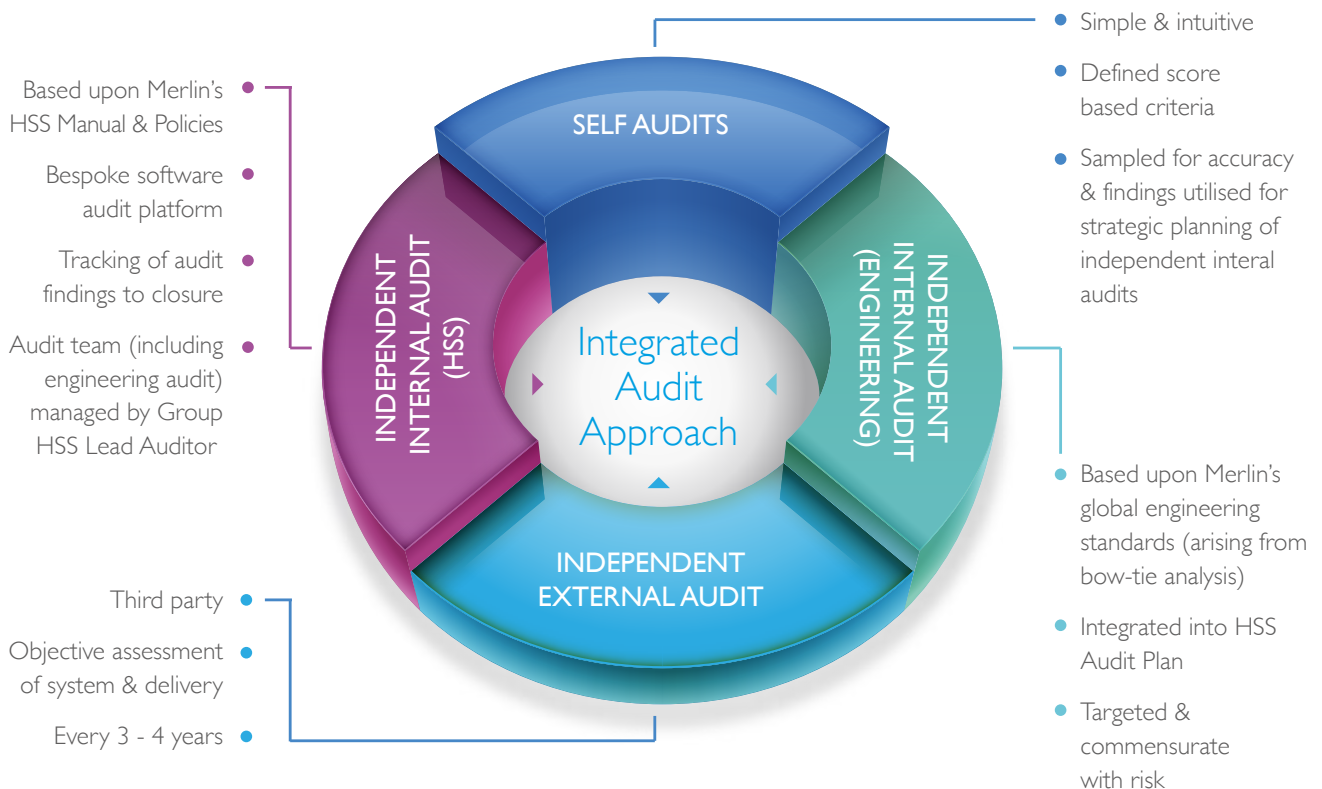
The Board HSS Committee, Divisional HSS Committees and every attraction or business unit review their

performance relative to HSS objectives and targets. This happens at least quarterly, after which a performance report is issued for information and benchmarking purposes.

Auditing HSS performance

Merlin's integrated audit approach is a fundamental element of its HSS management system and provides an important way of measuring and reviewing performance against the HSS Policy and its associated standards. As the diagram below demonstrates, the approach comprises three key elements:

- 1) Annual self-audits carried out by individual attractions / businesses;
- 2) Independent internal audits conducted by specialist Group HSS and Engineering audit teams; and
- 3) Independent external audits, completed periodically by a specialist third party.



Overall, every Merlin attraction receives routine health and safety audits from HSS professionals, which enable them to remain compliant with the Company's Global Health and Safety Manual and other safety policies.

These safety audits complement regular safety inspections and audits that take place every year. Some of these audits are regional, while others are launched by the attractions

themselves and include additional monitoring of HSS arrangements through reviews of risk assessments, workplace inspections, reviews of incident data and evaluation of work-related ill-health. Should any audit identify any non-compliance or areas for improvement, action is taken immediately to resolve these issues.



SECTION 7

Attraction Security

HEALTH, SAFETY & SECURITY POLICY





A range of both active and passive security measures are in place across Merlin's attractions in order to prevent the Company's sites, assets and operations from being compromised. Central to these measures is the role played by employees and security teams. Safety and security infuses Merlin's values and culture, and everybody at Merlin has an important part to play in making sure that its attractions remain safe and secure places for people to enjoy.

Merlin's security teams are trained to be vigilant and responsive to any threat; they monitor or patrol its properties 24 hours a day and work in conjunction with the relevant authorities to rehearse and carry out particular security measures. Beyond physical patrols, Merlin uses CCTV and other technology, such as Automatic Number Plate Recognition on vehicles, to protect property, people and guests and provide additional peace of mind.

As the nature of security risks and threats continues to evolve, Merlin works closely with local police forces and government security agencies to share relevant information and ensure that its security arrangements remain suitable, proportionate and robust. As part of this process, the Company continually reviews its security measures and updates them as required.

Merlin's own security system allows it to immediately identify security risks and broader trends, regardless of when or where in the world they occur. The system also enables it to reconsider and, if necessary, refine its procedures and then inform other Merlin operations so that every attraction can benefit from the experience of others.

Although it is important to concentrate on major security issues, security at Merlin is successful because its teams pay close attention to everyday details. 'The Merlin Way' stresses the importance of employees taking personal ownership of every element of their work, including security.

Whatever their role, all employees are responsible for keeping colleagues, contractors and guests safe and secure.

They never forget that reuniting a visitor with a missing child or some lost property is just as important as protecting a large theme park and its assets.



SECTION 8

Communication

HEALTH, SAFETY & SECURITY POLICY





Merlin employees worldwide are dedicated to providing visitors with experiences that are both memorable and safe. To this end, Merlin's Health, Safety & Security programme is called 'Protecting the Magic'.

It has three key aims:

1


To uphold a proactive, positive and fair safety culture across Merlin's business operations worldwide.

2

To promote strong and effective levels of Health, Safety & Security awareness among Merlin's employees and contractors.

3

To drive workforce engagement about all Health, Safety & Security matters.



'Protecting the Magic' incorporates an internal SharePoint site that acts as a portal for all HSS-related news and information. It includes an e-library of internal policies, guidance and training materials, as well as HSS-related communications, such as safety bulletins and alerts. In addition, it is how Merlin employees access the Company's active and reactive HSS monitoring systems.

These include its global incident recording and investigation reports and the Company's auditing software platforms, both of which are used extensively for monitoring HSS performance and analysing HSS trends.

Across Merlin, the most widely-known element of 'Protecting the Magic' is a set of six basic safety principles – known as...



6 Spells for Safety

These are Merlin's golden rules for HSS, they apply to every employee and contractor, and demonstrate clearly what good health, safety and security conduct means in practice.

The Six Spells for Safety



1. USE YOUR HEAD

Think 'Safety First' before starting every task



2. DO IT RIGHT

Follow all safety rules, signs and practices



3. BE ON GUARD

Keep guests, colleagues and animals safe



4. TAKE A MINUTE

Always keep your work area safe, secure and tidy



5. TELL US NOW

Report anything unsafe and ask if you're ever unsure



6. HELP US ALL

Share your ideas for improving safety



To promote the Company's ethos of shared responsibility, each year every Merlin attraction and office worldwide join forces to put the spotlight on HSS in a global 'Safety Week'.

All employees are responsible for working towards 'Protecting the Magic' by holding events and engaging in activities that promote HSS and the 'Six Spells for Safety'.

These events reinforce the message that it is down to every Merlin employee to look out for, and talk about, anything that they think could be done more effectively.

On a daily basis, employees are required to alert their manager or supervisor to any issues they spot during regular checks at the start of each day. Alternatively, they can issue formal near-miss reports which are then sent quickly to the relevant HSS and management teams to be resolved.

In addition, Merlin's annual employee survey (which specifically asks questions about HSS), combined with the Company's programme of HSS audits and its regular HSS Committee meetings, enables it to gauge the effectiveness of its HSS management system and employee engagement with 'Protecting the Magic' across the business.

Only through the involvement and engagement of every employee can Merlin achieve HSS standards that continually raise the bar and exceed its legal obligations.

The aim is to set and achieve world-class HSS performance every day and in every Merlin attraction around the world.



Safety Never Ends

Safety will always remain a top priority for Merlin and we're proud of the processes, systems and procedures we have in place across our business and of the huge team of people who care about keeping our guests safe. Our commitment to safety is as much a part of our culture as our dedication to putting smiles on people's faces.

We appreciate that we can never take safety for granted or become complacent in this area. That's why we're continually working to identify and deliver new ideas for improving safety and reducing risk for our guests and people.



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