

MENTAL HEALTH AND WELLBEING POLICY

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Clause 1: Scope and Applicability

1.1 This Mental Health and Wellbeing Policy ("the Policy") applies to all employees, agency workers, consultants, directors, contractors, and any individual working under the direction of Urathon Ltd ("the Company"), regardless of employment status or working arrangements.

1.2 This Policy is applicable in all employment settings, including permanent, temporary, part-time, full-time, hybrid, remote, and freelance roles.

1.3 The Policy is issued in accordance with the Company's statutory obligations under the Health and Safety at Work etc. Act 1974, the Equality Act 2010 (particularly provisions concerning disability discrimination), the Employment Rights Act 1996, the Data Protection Act 2018, and relevant guidance including ACAS, HSE, and NICE guidelines.

Clause 2: Definitions

2.1 *Mental Health* refers to a person's emotional, cognitive, and social well-being, which impacts their capacity to manage stress, maintain relationships, and perform effectively at work.

2.2 *Reasonable Adjustments* are legally mandated modifications or accommodations to the working environment or practices made to alleviate disadvantage for individuals with mental health conditions, pursuant to Sections 20–21 of the Equality Act 2010.

2.3 *Wellbeing* is defined as a holistic state encompassing physical health, mental stability, social connectedness, and occupational satisfaction, all of which contribute to resilience, engagement, and productivity.

Clause 3: Duty of Care

3.1 The Company affirms its common law and statutory duty of care to safeguard employees' mental health and psychological safety.

3.2 Line managers and supervisors are under a delegated responsibility to foster environments that prevent psychological harm, promote mental health literacy, and support inclusive dialogue.

3.3 Risk assessments conducted under the Management of Health and Safety at Work

Regulations 1999 shall include psychosocial hazards, stress indicators, and workplace culture.

Clause 4: Reasonable Adjustments

4.1 Upon disclosure or identification of a mental health condition, the Company will engage in a collaborative assessment process to determine reasonable accommodations.

4.2 Adjustments may encompass flexible hours, workload redistribution, job redesign, location changes, phased returns, or regular supervisory meetings tailored to support employee health.

4.3 All such matters will be documented, managed confidentially under GDPR provisions, and reviewed regularly for effectiveness.

Clause 5: Mental Health Support

5.1 Employees shall have access to confidential mental health resources, including but not limited to Employee Assistance Programmes (EAP), clinical counselling, and mental health first aiders trained to Level 3 standards.

5.2 The Company will offer referrals to occupational health advisors and liaise with NHS or charitable services where specialist intervention is required.

5.3 Managers shall be trained to identify early warning signs of mental health deterioration and respond using a trauma-informed, non-judgmental approach.

Clause 6: Flexible Working

6.1 Flexible working requests made under the Employment Rights Act 1996, Section 80F, shall be considered with particular sympathy where mental health factors are involved.

6.2 The Company supports flexible or hybrid work models, compressed hours, or adjusted responsibilities as reasonable means to prevent or alleviate mental health conditions.

6.3 Medical or occupational health input will inform whether changes are temporary, phased, or permanent in nature.

Clause 7: Training and Awareness

7.1 The Company will implement regular and compulsory mental health awareness training for all employees, delivered by qualified professionals or endorsed providers.

7.2 Supervisory staff shall receive additional instruction in mental health risk assessment, reasonable adjustment facilitation, and supportive conversations in line with the ACAS Code of Practice.

Clause 8: Anti-Discrimination

8.1 Discrimination, harassment, or victimisation on the grounds of mental health shall be treated as gross misconduct and subject to disciplinary procedures under the Equality Act 2010.

8.2 Mental health conditions may qualify as disabilities under Section 6 of the Equality Act, thereby affording affected individuals legal protections.

8.3 Retaliatory action against those disclosing mental health conditions or participating in support initiatives will not be tolerated.

Clause 9: Consultation

9.1 The Company will consult with staff, trade union representatives, and health and safety committees to design, review, and implement mental health strategies.

9.2 Engagement may include surveys, focus groups, mental health champions, and anonymous feedback platforms to ensure inclusivity.

Clause 10: Specific Considerations for Wheelchair Manufacturers

10.1 In the context of manufacturing environments, workload demands must be balanced to mitigate physical and cognitive strain.

10.2 All facilities must be accessible in accordance with the Equality Act 2010 and Building Regulations Part M.

10.3 Inclusive design thinking will be a core principle for engineers and designers to integrate health, dignity, and independence.

Clause 11: Physical Workplace and Ergonomics

11.1 All workstations, equipment, and environments must meet HSE ergonomic standards and be reviewed annually.

11.2 Lighting, acoustics, air quality, and seating posture must be suitable for sustained cognitive performance.

11.3 For roles involving repetitive manual tasks or prolonged screen use, timed breaks, rotation, and ergonomic aids must be offered.

Clause 12: Communication and Access

12.1 Communication about mental health shall be stigma-free, accessible to neurodiverse individuals, and culturally sensitive.

12.2 Secure channels, including anonymous helplines, private HR consultations, and written submissions, must be made available for disclosures.

Clause 13: Inclusive Culture

13.1 Psychological safety, inclusion, and mutual respect shall be embedded into company policies, mission, and leadership behaviors.

13.2 Performance management frameworks shall consider wellbeing metrics and emotional labour.

Clause 14: Specific Considerations for CGM Manufacturers

14.1 The emotional toll of high-risk, clinically regulated production environments shall be recognised in wellbeing assessments.

14.2 Clinical and engineering staff shall receive specialist training in stress management, vicarious trauma, and resilience.

14.3 In accordance with MHRA guidelines, product design must take into account the psychological effects of long-term medical device use.

14.4 Partnerships with clinicians, users, and charities will ensure that employee wellbeing aligns with patient-centric values.

Clause 15: Employee Rights and Confidentiality

15.1 All data concerning mental health will be processed in accordance with the Data Protection Act 2018 and GDPR Articles 6 and 9.

15.2 No adverse employment action will be taken due to disclosure of a mental health condition or absence for mental health reasons.

15.3 All disciplinary or capability procedures will consider mental health as a mitigating factor, and reasonable adjustments will be prioritised.

Clause 16: Resources and Early Intervention

16.1 Preventive tools—including mindfulness platforms, wellbeing apps, resilience workshops, and mental health leave—shall be available to all staff.

16.2 Employees are encouraged to self-identify early signs of distress and will be supported without stigma.

16.3 Managers must monitor team wellbeing and refer complex cases to HR, occupational health, or external services as appropriate.

Clause 17: Compliance with Legislation

17.1 The Company's compliance obligations include:

- Equality Act 2010
- Health and Safety at Work etc. Act 1974
- Data Protection Act 2018
- Employment Rights Act 1996
- Human Rights Act 1998
- NICE Public Health Guidelines (e.g., PH22, NG13)

17.2 Breach of this Policy may lead to internal investigation, corrective or regulatory action.

Clause 18: Collaboration and Partnerships

18.1 The Company shall maintain active partnerships with:

- NHS occupational services
- Mental health charities (e.g., Mind, Mental Health Foundation)
- Regulatory bodies (e.g., HSE, MHRA)

18.2 Best practice benchmarking and joint initiatives will be pursued wherever beneficial to workforce wellbeing.

Clause 19: Regular Review and Updates

19.1 This Policy will be formally reviewed at least annually or in response to legal, clinical, or operational developments.

19.2 Feedback from staff, unions, and regulators will be considered in all revisions to ensure ongoing relevance and effectiveness.