

G.D. SMY LIMITED

HEALTH & SAFETY POLICY

Health and Safety Policy

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Health & Safety Policy

General Statement

G.D. Smy Limited shall effect the provisions of the Health and Safety at Work Etc. Act 1974 and all relevant statutory legislation; accepting our legal and moral responsibility to protect and enhance the health, safety and welfare of our employees and to not adversely affect others outside of our employment.

Our health and safety management policy shall revolve around risk control strategy through identification of hazards, risk and safe systems of work, with the provision and application of adequate resources to meet the demands of legislation, our policy and our commitment towards planning and continual improvement.

We shall consult, inform, supervise and train our employees as necessary, requiring full co-operation from them; and appoint or seek the guidance of competent persons to ensure our policy is implemented, maintained and improved where practicable.

Where necessary we shall enforce the policy through disciplinary measures should the need arise and employees are reminded that neglect of policy is considered serious misconduct.

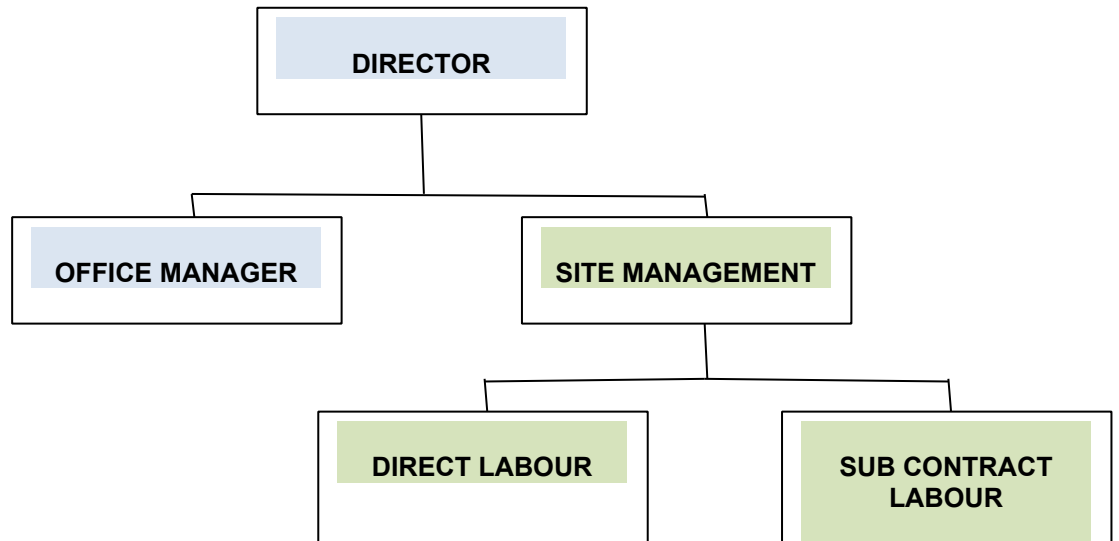
We shall measure and monitor performance and review policy annually or in light of legislation change, technical progress, significant changes to company structure or following any noted omissions.

Gary Smy
Director Responsible for Safety

Issued: October 2012

Review Dates:

| Date: | Reviewer | Signature |
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Organisational Responsibilities:**All employees are required to:**

- 1) Know, understand and implement policy, standards and rules at all company work locations as applicable to personal work tasks.
- 2) Set a personal example at all times, particularly by wearing appropriate protective clothing and safety equipment.
- 3) Take reasonable care for their own health and safety and for the health and safety of those people who may be affected by their actions.
- 4) Report any incidents, accidents or unsafe conditions.
- 5) Co-operate with the requirements of this policy.
- 6) Work in accordance with any training received.
- 7) Specifically fulfil all applicable requirements of the arrangements section, ensuring deputy provision for absences where applicable.

The Director (Director responsible for health and safety)

- 1) Will actively participate in and support the development of a positive health, safety and environmental culture.
- 2) Will be familiar with the broad requirements of health, safety and environmental legislation.
- 3) Have overall responsibility for the implementation, monitoring and review of the health, safety and environmental policy and ensure relevant parts are brought to the attention of employees (and others) as appropriate.
- 4) Ensure that all levels of staff receive adequate and appropriate training.
- 5) Will monitor the performance of management in discharging their responsibilities under this policy.
- 6) Reprimand members of staff failing to discharge satisfactorily the responsibilities reasonably allocated to them under this policy.
- 7) Will ensure allocation of sufficient resources to enable the policy to be operated effectively.

- 8) Will ensure the setting of specific aims and objectives and measurement of overall performance.
- 9) Liaise with external health and safety advisors and other relevant bodies, evaluating site inspection reports and audit reports provided and take appropriate actions on recommendations.
- 10) Maintain an open-door access policy.

Contracts Management (when acting as):

- 1) Will actively participate in and support the development of a positive health, safety and environmental culture and aid company efforts to achieve the set objectives.
- 2) Will be familiar with the broad requirements of health, safety and environmental legislation.
- 3) Be specifically responsible for ensuring the requirements of health, safety and environmental legislation and the requirements of this policy, as far as it relates to construction projects, is implemented and performance monitored.
- 4) Specifically monitor the performance of operatives and contractors under their direction, reprimanding them within company guidelines for breaches of policy or legislative requirements.
- 5) Make representation to the Director responsible for safety in respect of required resources and ensure allocated resources are suitably used.
- 6) Ensure sites are properly set up with adequate welfare and first aid facilities from the first day of use until the last day on site.
- 7) Liaise closely with clients, site management and health and safety professionals on all health, safety and environmental issues.
- 8) Comply with company policy when undertaken associated roles (e.g. acting as an estimator / buyer)
- 9) Maintain an open-door access policy

Site Management including: Managers, Supervisors and Forepersons:

- 1) Will actively participate in and support the development of a positive health, safety and environmental culture and aid company efforts to achieve the set objectives.
- 2) Will be familiar with the broad requirements of health, safety and environmental legislation.
- 3) Be specifically responsible for ensuring the requirements of health, safety and environmental legislation and the requirements of this policy, as far as it relates to construction projects, is implemented and performance monitored.
- 4) Specifically monitor the performance of operatives and contractors under their direction, reprimanding them within company guidelines for breaches of policy or legislative requirements.
- 5) Consult and co-operate with their line managers and visiting advisors on health, safety and environmental topics as appropriate.

Arrangements:

Information:

Advisory literature on health and safety matters will be obtained from various sources such as the HSE and other authority bodies, our external consultants and trade associations etc. This shall be disseminated as deemed appropriate throughout the company to the relevant persons by the Director responsible for safety.

Induction and Training:

The Director shall ensure training needs are evaluated from assessment of legal and policy requirements that impose duties upon individuals. Induction training shall be carried out by line management on the first day of work / new project.

We shall implement and maintain a training record matrix sheet to ensure refresher training is carried out when required.

Consultation and Communication:

It is the company policy to consult and communicate with employees (and others as may be necessary) through a range of mediums including; an open-door policy by management, the induction process, site meetings and directly through line management communication chains.

We shall operate a policy where non or poor English speaking labour is employed, they will either speak English as a second language being able to understand simple instructions adequately, or an interpreter will be required at all times. We shall seek the help of language line and make use of leaflets printed in different languages from the HSE where required. We shall ensure that where visually or hearing-impaired persons are employed that adequate communication measures are provided.

Competent advice:

We subscribe to the services of H & K Safety Services Limited for external competent advice.

Monitoring and Review:

Our Contracts Managers and External Consultants shall conduct periodic ad-hoc site inspections and record the findings. The Director (responsible for safety) and Contracts Manager will evaluate reports, including collated key performance indicators to ensure recommendations are carried out as appropriate. We shall undertake an annual review of our management system.

Risk Assessment, Safe System of Work and Control Hierarchy:

It shall be the company policy to assess all aspects of our undertakings to determine significant risks, of which when determined shall be recorded and communicated to those who may be exposed. Risk assessments shall be reviewed regularly to ensure that they remain suitable and sufficient with any changes being communicated to those affected.

We have developed initial risk assessments that are re-evaluated on site by our Supervisors.

Contractor's assessments shall be evaluated prior to allowing commencement on site.

The risk assessment process shall be used to identify adequate measures to control that risk and to develop a safe system of work that shall be written and follow the company expected hierarchy of:

- Avoiding risks
- Combating risks at source
- Adapting the work to the individual
- Adapting to technical progress
- Substitution of the dangerous for the less dangerous
- Giving collective protective measures priority over individual protection measures
- Giving appropriate, instruction, information and training to employees.

In addition where a specific hierarchy has been determined by regulation, then these shall be followed.

We shall seek specific advice where special risks arise from circumstances of which we are unfamiliar or do not have relevant competencies to properly evaluate or control.

With particular reference to young persons, it is the company policy to take specific account of the vulnerability of these groups and to make assessment of the potential impact of company undertakings upon them to determine adequate controls.

The Director and Contracts Managers shall ensure that this policy is adhered to.

Substances Hazardous to Health:

It is our policy to evaluate all activities to determine potential exposure to COSHH related substances and whether hazardous substances can be substituted for substances less hazardous. No substances that fall into this category can be used until an assessment has been made after taking into account the environment in which it is to be used and the potential exposure levels, duration etc. has been considered. Hazard safety data sheets shall be obtained (by those purchasing materials) to assist with the assessment process. We shall also consider affecting issues (from processes and biological) and ensure adequate control measures have been determined, those affected given relevant information, instruction, training and supervision.

Plant and Equipment:

Only those with relevant training shall be permitted to operate work equipment, though this policy shall not prevent equipment use for training purposes when under the supervision of a competent person. The Contracts Director, contracts and site managers shall be responsible for ensuring that this is adhered to. At site level, site managers, foremen and supervisors shall ensure policy is adhered to.

Equipment use shall be suitable for task and regularly inspected (including before use), as determined through the assessment process and inspection by the end user. All equipment noted to be defective will be removed from use until repaired or replaced. All equipment removed shall be marked as unsafe for use. The person responsible for identification of the defective equipment shall be responsible for ensuring policy is followed.

Those hiring or purchasing plant and equipment are responsible for ensuring it is fit for purpose and the required certificate of conformity, test / calibration certification, inspection and maintenance records and instructions for use are included and passed onto the end user, who shall inspect prior to use. Plant purchased or hired shall be consider for noise, vibration and fume emissions.

Incident Reporting and investigation:

All incidents where harm is caused to persons are recorded in the accident book and statistics monitored. Reportable incidents are notified to the HSE (immediately for fatality / major and within 15 days for over-seven day incidents, dangerous occurrences as advised and diseases as notified by a medical practitioner) (Director responsibility). Our Director investigate all over-seven day incidents and fatalities or major incidents; the latter with assistance from our external consultants. The Director will also determine whether to seek external assistance in instances of notifiable disease or dangerous occurrences. Currently it is not company policy to record or investigate near miss incidents although minor first aid incidents are evaluated.

First Aid:

Contracts Managers shall assess and determine their specific needs in this regard and ensure adequate trained personnel and suitably stocked first aid kits are provided for their areas / projects; and that the provision is maintained.

The Director will assess the needs of our head office and ensure suitably trained first aiders and provision is in place.

Fire Safety and Emergency Procedures:

Contracts Managers will assess each project specifically and ensure adequate arrangements are made.

A fire risk assessment has been undertaken for our offices and is reviewed annually or in light of significant change by the Director. The Director undertakes the role of the responsible person as required by legislation.

All of our sites and premises shall be deemed as no smoking areas.

Personal / Respiratory Protective Equipment:

It is company policy to evaluate hazards and risk and control by means other than PPE / RPE where practicable. Contracts / Site Supervisors will assess risks and determine where, when and which PPE / RPE is necessary. We shall ensure that employees are trained and made aware of use, maintenance and limitations of all PPE / RPE provided and supervise as necessary the wearing of when required.

We shall provide and replace PPE / RPE as determined necessary free of charge, and only use such equipment with the relevant British Standard / European Norm. We shall retain a register of all PPE issued (site foreperson).

Asbestos:

All projects tendered will be subject to evaluation of potential existence of asbestos containing materials and exposure hazard. Relevant documentation (demolition and refurbishment surveys) shall be sought and evaluated prior to commencement of each project. All employees likely to encounter asbestos or supervise those that may do so shall be appropriately trained in recognition, management and emergency procedures and given periodic reminders.

Noise and vibration:

See also plant and equipment selection.

It is our policy to evaluate noise on each project and determine safe systems of work to isolate noisy activities or where this is not practicable, to determine necessary hearing protection zones and provide adequate PPE and ensure it is worn to reduce to below the exposure action value. Contracts Managers will ensure this policy is adhered to.

Vibration levels of equipment shall be assessed and trigger time determined. It is our policy not to exceed the exposure action level and Contracts Managers are required to determine suitable control measures to ensure this policy is adhered to.

Services:

The following policy will be adopted within the company:

- All fixed and temporary electrical appliances will satisfy the relevant IEE Wiring standards and British Standards and shall be accordingly inspected, tested and maintained
- All site tools and equipment shall be of 110 volt or lower. Where equipment can only be used of a higher voltage, express permission must be gained from management in writing, following an assessment.
- No live working will be permitted
- All work on or near services will be subject to a permit to work system.
- All services will be located, identified and marked as appropriate prior to any other related activity. Where applicable, drawings will be obtained from service providers but these will not be strictly relied upon for accuracy
- Competent, trained persons shall only be permitted to work with services and related equipment
- Emergency plans shall be determined for all work relative to services

The Director ensures all services are controlled in line with the above at the office. The Contracts Manager shall ensure planning for the above on applicable projects and Supervisors as applicable shall ensure policy is adhered to at site level.

Work at Height:

The company policy is to thoroughly plan all work at height activities and avoid working at height wherever possible. Where this is not practicable we shall select and provide suitable work equipment following an assessment by the Contracts Manager in line with the hierarchy of control measures identified in the Work at Height Regulations.

It shall be our policy to only use ladders following an assessment to determine if alternative equipment can be used and the frequency, duration and activity to be undertaken from ladders.

We shall ensure that only competent persons are permitted to work at height or manage such works and wherever practicable it shall be company policy not to allow lone working where any work at height activity is necessary and to provide adequate supervision.

Manual Handling:

It shall be the company policy to avoid manual handling where practicably possible through use of mechanical lifting aids. Risk assessments shall be undertaken in line with company policy where manual handling operations are necessary with consideration given to the task, the individual, the environment and the load.

Staff will be provided with relevant training and instruction.

Display Screen Equipment:

It is company policy to evaluate and assess the risk from all display screen equipment use. We shall determine users and offer eye tests, providing standard eye glasses where prescribed. The Office Manager shall determine users, assessment (and review) and for ensuring users are aware of their entitlement; and to ensure our equipment purchasing policy is adhered to.

Working Time:

We recognise the importance of social life and it is company policy to follow the Working Time Regulations to ensure that excessively long hours are not worked in any given period. We shall ensure adequate rest and break times are provided and that holiday entitlement meets the minimum requirement. The Director shall have the responsibility for ensuring this requirement is followed.

Health Surveillance:

It shall be company policy to control our activities to prevent the need for health surveillance. However we shall determine any necessary health surveillance requirements through the assessment process and continual monitoring (e.g. through absence records, complaints etc.) through line management.

Where health surveillance programmes are required, we shall consult with a medical practitioner or occupational health professional to design such programmes. The decision to consult in such a manner will be made by the Director. All Managers have a responsibility for providing the Director with relevant information on which to base any decisions.

We shall operate a system whereby all employees shall complete a medical questionnaire.

Contractor Control:

We shall select contractors from our current database of preferred contractors who have been selected on historical knowledge of performance or undergone a vetting procedure such as a questionnaire or other similar evaluation.

All other contractors will be subject to competency checks prior to appointment through a variety of methods including questionnaire response evaluation, document evaluation, references and interview. This process shall include all client determined contractor use. The Contracts Manager shall be responsible for ensuring this process is adhered to and the selection of competence check method.

Secondary vetting shall be undertaken through evaluation of site-based documentation. The Director shall be responsible for vetting of contractors engaged for work at the office. The Contracts Manager and Site Supervisor shall be responsible for secondary vetting of projects. The Contracts Managers shall determine final vetting responsibility in relation to their own projects.

Contractor performance shall be monitored via internal supervision and external consultant's ad-hoc health and safety site inspection visits. On larger projects, Supervisors will provide information on contractor performance during regular site meetings. The Contracts Manager will be responsible for collection and evaluation of information gathered and for passing comment for database maintenance.

Where contractors consistently fail to perform to our expected standards they will be removed from the preferred contractors database lists and be subject to re-vetting of competency prior to any further appointment. Removal and re-engagement shall be the decision of the Director.

Agency workers shall only be engaged from reputable agencies where relevant documented evidence of the person's competencies has been provided. Those that engage such labour will be responsible for ensuring compliance with company policy.

Company vehicles:

It shall be the company policy to ensure all vehicles are maintained in a roadworthy condition at all times. Drivers will be responsible for ensuring they are properly driven and loaded; and for carrying out an inspection prior to use and for reporting defects. We shall only allow our vehicles to be driven by those with the appropriate licence and these shall be checked annually.

Mobile phones:

In line with legislation, the use of hand-held phones while driving on company business is prohibited. They can only be used when safely parked, with the engine switched off, before commencing communication, whether the medium is speech, text or any other form of data transfer. **All employees** are expected to comply with this policy.

Hands free mobile conversations are permissible with the correct equipment but should only take place when traffic conditions make it safe to do so. If it is not safe, calls should be ignored or terminated. It is our preferred policy for calls to be taken by the answer phone function and replied to when the driver has reached their destination.

Welfare, Housekeeping and waste:

We shall ensure that our welfare provisions meet with the requirement of the Workplace (Health and Safety) Regulations for the office and schedule 2 to the CDM Regulations for site works.

The company shall enforce a policy of high standards of housekeeping at all premises, within company vehicles and on all project sites. The office have a cleaning and waste control programme in place, to be maintained by the Office Manager and all projects will be assessed by the Contracts Manager with appropriate control measures identified to maintain company policy throughout. The Supervisor shall enforce this policy at site level.

All sites shall be assessed for special / hazardous waste and relevant licences obtained and methods of removal determined. This shall be the responsibility of the Contract Manager.

CDM:

We are committed to planning for safety. On all projects we shall evaluate enquiry information, assess hazards and risks to determine control measures and necessary resources to comply with statutory requirements and our policy. We shall ensure that our tender prices include appropriate sums to maintain the safe systems of work and resources for the project, identified through planning. When estimating we shall ensure this policy is applied at tender stage (through liaison with Contracts Managers as necessary)

In particular, where the CDM Regulations are notifiable and we are appointed as principal contractor, we shall:

- Ensure the CDM co-ordinator has been appointed
- Develop and maintain the health and safety plan
- Ensure competent people and contractors are engaged as required
- Allow adequate time for sub contractors to plan and mobilise.
- Ensure a documented induction system is in place at the start of each project
- Ensure adequate welfare facilities are provided and maintained.
- Ensure co-ordination of activities and request cooperation from all
- Consult with the workforce
- Ensure project notified and display notification details
- Monitor health and safety performance
- Provide reasonably requested information to the CDM Co-ordinator

As Contractor we shall ensure that we:

- Ensure the CDM-C has been appointed where applicable and that the client is aware of their duties
- Ensure the project has been notified to the HSE (where applicable)

- Ensure competency of those engaged in our activities
- Consult, communicate and cooperate with others involved in the project
- Ensure inductions undertaken
- Properly plan, execute and monitor the work applying the principles of prevention
- Provide reasonably requested information

The Contracts Managers shall ensure health and safety plans are developed where required and that health and safety file information is provided. They shall also ensure that the company policy in this regard is maintained at site level.