
HEALTH AND SAFETY POLICY STATEMENT

STATEMENT OF INTENT

The Longwood Engineering Company Limited is committed to a programme of continual improvement in OH&S management and performance to all employees, contractors/sub contractors, visitors and anyone else who may be exposed to the Company's activities. Through creating an environment that enhances the wellbeing of its employees, the Company's business performance will also be enhanced to benefit all stakeholders.

From the highest level we have a commitment to ensure that:-

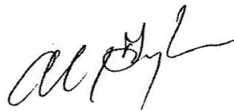
- We comply with all relevant legislation, regulations and other requirements that are applicable to the Company's activities on our own site or to requirements whilst on a Client's site. As part of our commitment to maintaining the highest levels of OH&S management, it is our intention that we maintain accreditation of our OH&S Management System to OHSAS 18001 and integrate occupational health and safety with quality and environment.
- These requirements are considered to be on an equal footing with other business interests, therefore resources such as financial, personnel and equipment will be allocated where necessary.
- We will acquire competent assistance to enable the Company to reach its aims for Health and Safety, regardless of the location of its employees.
- We continuously improve employee training, awareness and development, to expand and maintain a proactive attitude and culture, to motivate all employees to behave in a safe and healthy responsible manner.
- Targets are set for the reduction and prevention of accidents, work related ill health and accident related loss of time and resources.
- The Company's commitment to good health and safety standards is also relayed to Clients, suppliers, the general public and other stakeholders, as appropriate.
- The Company's Health and Safety performance is continually assessed through communication and measuring performance, so continual improvements and setting of relevant Health and Safety objectives and targets can be implemented.

Declaration

This Policy Statement is made by the Managing Director of the Company to define, endorse and demonstrate commitment to Health and Safety. The operation of this policy and associated procedures will be monitored and reviewed annually or where changes occur in relevant legislation, Company procedures or in the event of a reportable incident.

Management and supervisory staff have responsibilities for the implementation of the policy and must ensure that Health and Safety issues are given adequate consideration in the planning and day-to-day supervision of all work.

Signed



A G Taylor – Managing Director

Date 21 December 2010

RESPONSIBILITIES

The Policy will be implemented through an Occupational Health & Safety (OH&S) Management System designed in accordance with BS OHSAS 18001: 2007. The Company's OH&S Management System describes the way in which it plans, organises, implements, monitors and reviews OH&S. The responsibilities of all employees are clearly defined below.

The responsibility for the OH&S of employees rests in the first instance with **The Directors**. As the Directors of the Company they are responsible for ensuring the overall implementation of the Company's Health & Safety Policy, and may delegate authority for specific matters to other parties, such as Department Heads, Supervisors, employees, contractors and advisors.

The Directors, while not personally carrying out duties, will ensure that:-

- OH&S is regarded as part of the Company's business plan, therefore it will be considered in all decisions.
- Employees will be encouraged to highlight shortfalls in the OH&S arrangements through formal committees and team briefings.
- OH&S is considered to be part of all employees' duties regardless of their position within the Company.
- They appoint competent personnel to implement OH&S measures.
- They are kept fully informed of OH&S issues.
- Action is taken upon advice received regarding OH&S improvements.

The Health & Safety System Supervisor is responsible for dealing with the OH&S Management System as part of their normal day to day duties. This may include working closely with the OH&S Advisors (external consultants). The Consultant will advise the Health and Safety System Supervisor as to what actions are required in order for them to fulfil the requirements of the OH&S Management System. Timings and frequency of visits will be agreed upon by all interested parties after reviewing the Company's needs and status. As part of their role, the OH&S Advisor and the Health and Safety System Supervisor will ensure that:-

- All aspects of Health and Safety law are monitored to ensure that the policy is complied with.
- All hazardous tasks, equipment and practices are risk assessed and the findings of those risk assessments are communicated to those affected.
- Recommended actions from risk assessments are implemented and that the original risks are reduced to an acceptable level.
- Employees are aware of and involved in arrangements made for their safety at work.
- Regular reviews take place for all OH&S Management System documentation and other related documents such as Health, Safety and Welfare Instructions and Policies.
- OH&S matters are communicated to all staff throughout the Company
- All accidents requiring investigation are investigated and corrective actions are implemented.

- They are kept fully informed of OH&S issues concerning employees working at sites which are not owned or controlled by the Company.
- The safety and health of those who may be affected by new and/or changing situations are assessed.
- The need for training is highlighted and where appropriate is provided.
- Induction training is provided including; job safety, fire precautions and emergency instructions, location of fire exits, first aid arrangements and accident reporting.

The above list is not exhaustive, any issues that have a potential to impact on the OH&S Management System should be considered by the Health and Safety System Supervisor.

The Department Heads/Supervisors (refer to OH&S organisation chart) are responsible for working with the Health and Safety System Supervisor in the implementation of the OH&S Management System. This is undertaken as part of their normal duties and capabilities. Some of these duties are generic, others may be more specific and are shown as follows:-

General duties of Department Heads/Supervisors

- To ensure that subordinates are aware of and are kept up to date with all OH&S arrangements/matters and that they obey rules and instructions.
- To ensure that contractors/sub contractors working on behalf of the Company are considered as employees, receive relevant information/instruction and are kept up to date with OH&S matters.
- To communicate and cooperate with the Health and Safety System Supervisor and the OH&S Advisor on Health and Safety matters.
- To ensure that good housekeeping standards are maintained.
- To ensure that all access and egress routes are clearly marked and kept clear.
- To ensure that access to all fire doors and fire fighting equipment is kept clear.
- To ensure that all items used to carry out their duties meet required standards laid out in the Health, Safety and Welfare instructions.
- To ensure that accident reporting is carried out according to the requirements of the Company accident reporting instruction.
- To ensure that employees, contractors, and visitors use and wear protective clothing and equipment, as appropriate.
- To ensure that disciplinary action is taken following a clear breach of OH&S rules/policy.
- To ensure that these arrangements are in place for those who are working at sites other than those owned or controlled by the Company.

Specific duties of Department Heads/Supervisors

| | |
|------------------------------|-----------------------------------|
| Product Safety | : Design / Drawing Office Manager |
| Product Safety (Electrical) | : Electrical Manager |
| Electrical Safety (General) | : Electrical Manager |
| Site Safety – Overall | : Technical/Sales Director |
| Site Safety – Day to day | : Site Work Supervisor |
| Site Safety – Electrical | : Electrical Manager |
| Site Safety – Specific sites | : Site Supervisor |

Employees also have duties placed upon them under Health and Safety law and the conditions of this Policy to:-

- Take reasonable care of themselves and others who may be affected by their acts or omissions at work.
- Co-operate with the Company or any other persons to enable statutory duties to be complied with.
- Attend relevant OH&S related meetings and take part in inspections if required.
- Not intentionally or recklessly interfere with or misuse anything provided in the interests of Health, Safety or Welfare in pursuance of any of the relevant statutory provisions.
- Use plant, equipment, substances and associated safety devices in accordance with any relevant training and instructions which they have received.
- Inform their Department Head/Supervisor of any shortcomings in the Company's Health and Safety arrangements.
- Report any accident/incident or near miss and co-operate in investigations as required with the object of introducing measures to prevent a recurrence.
- Work safely and efficiently by using instructions and equipment provided for Health and Safety.
- Ensure that all access and egress routes, fire doors and fire fighting equipment are kept clear at all times.

It is stressed that the promotion of Health and Safety measures are regarded as a mutual objective for all management and employees. You must acquaint yourself with and comply with the Company Health, Safety and Welfare rules and instructions.

POLICY MANUAL

| | | |
|----------------|------------|---|
| Section | 1.0 | General Requirements |
| Section | 2.0 | OH&S Policy |
| Section | 3.0 | Planning |
| | 3.1 | Risk Assessment |
| | 3.2 | Legal and Other Requirements |
| | 3.3 | Objectives |
| | 3.4 | OH&S Management Programme |
| Section | 4.0 | Implementation and Operation |
| | 4.1 | Structure and Responsibility |
| | 4.2 | Training, Awareness and Competence |
| | 4.3 | Consultation and Communication |
| | 4.4 | OH&S Management System Documentation |
| | 4.5 | Document and Data Control |
| | 4.6 | Operational Control |
| | 4.7 | Emergency Preparedness and Response |
| Section | 5.0 | Checking and Corrective Action |
| | 5.1 | Performance Measurement and Monitoring |
| | 5.2 | Accidents/Incidents, Corrective and Preventative Action |
| | 5.3 | Records and Records Management |
| | 5.4 | Audit |
| Section | 6.0 | Management Review |

1.0 GENERAL REQUIREMENTS

The Company is committed to the implementation of an OH&S Management System to conform to BS OHSAS 18001: 2007. The requirements of the OH&S Management System integrate occupational health and safety, quality and environmental issues.

This manual defines the OH&S Policy commitment, organisation and instructions adopted to attain the Company's objectives and to ensure continual improvement.

The Health and Safety System Supervisor is responsible for the maintenance, revision, issue and control of all Management System documentation including policies and procedures. This will be recorded on an Issue and Revision Distribution Log.

OH&S Management System documents are all given a title and an individual OH&S number, located on the document header. The electronic location of each document is identified on the appropriate Issue and Revision Distribution Log.

Health, Safety and Welfare Instructions are used to supplement the Management System where necessary.

2.0 OH&S POLICY

The OH&S Policy states the Company's intentions on how it will deal with the Health, Safety and Welfare of anyone who may be affected by its activities, either directly or indirectly. The OH&S Policy will be regularly reviewed to ensure that legal compliance and the commitment to continual improvement is maintained.

The Directors are responsible for ensuring that the OH&S Policy is maintained and is updated as and when required.

The OH&S Policy is freely available to employees, members of the public, customers and suppliers.

Copies of the OH&S Policy are available on request from the Health and Safety System Supervisor.

3.0 PLANNING

3.1 Risk Assessment

Risk assessments will be carried out to determine the following:-

- To identify the control measures necessary to address hazards.
- The adequacy of existing control measures.
- To develop or amend Health, Safety and Welfare Instructions.
- To ensure that the task is performed safely without any adverse effects.
- To determine the level of training and instruction required.

Risk assessments will only be undertaken using the methodologies documented within the procedures.

Under the OHSAS 18001 requirements, when risks are identified, the particular activity or area will be recorded in an appropriate register. This register will be compiled as part of the Company's commitment to adhere to OHSAS 18001.

The Company shall carry out a periodic review in order to assess any changes with regard to risk rating.

3.2 Legal and other requirements

The Company assesses its activities, products and services to identify the legislative, regulatory or other Policy requirements which may have an OH&S aspect.

Activities, products or services identified as being subject to legislative, regulatory or other controls are recorded in the register of legislative, regulatory and other requirements.

The immediate requirement of the OH&S Management System is to ensure legal compliance in order to facilitate adequately the requirements of each standard. This will involve full monitoring and control of all aspects of the Company's activities.

The Company will also assess and control the selection of its materials, suppliers and contractors.

3.3 Objectives

Objectives shall be consistent with the requirements of the OH&S Policy. Objectives will be drawn from management meetings involving the Directors, Department Heads/Supervisors and the Health and Safety System Supervisor. Risk assessments will also be used for this purpose.

The objectives will be quantifiable wherever practical and will illustrate a commitment to continuous improvement.

The Company will set up and maintain arrangements so that realistic objectives can be established.

3.4 Management Programme

Objectives will be set out in an established management programme. Each programme shall define the OH&S objective to be attained, how it will be achieved, who is responsible and timescales involved.

Changes to objectives will be dealt with through an established instruction that enables modifications as projects proceed through the instigation of corrective actions.

All changes, modifications, corrective actions and follow up assessments are recorded and maintained.

The Company will ensure that all activities carried out on Customer sites comply with the requirements of the OH&S Policy. This will be done through the Company's Health, Safety and Welfare Instructions and risk assessments, or by complying with site owner's OH&S arrangements.

4.0 IMPLEMENTATION AND OPERATION

4.1 Structure and Responsibility

The responsibilities of individuals are clearly defined throughout this manual. The Health and Safety System Supervisor has the authority and responsibility for ensuring that requirements of OHSAS 18001 are fulfilled and that the Company's OH&S Policy is implemented and maintained. They are also responsible for the control and management of the OH&S Management System. The Directors have overall authority and responsibility.

In the absence of the Health and Safety System Supervisor, a nominated member of the management team shall resume responsibilities. The Directors are responsible for providing resources and personnel to facilitate OH&S improvements.

Actions will be initiated by the management team to ensure compliance with objectives and the OH&S Policy. The management team will also initiate, recommend or provide any necessary solutions to identified OH&S problems.

Non management employees will ensure OH&S compliance at all times. Projects that are identified and implemented must be verified by competent personnel from either within the Company or externally.

4.2 Training, Awareness and Competence

The Company will ensure that all employees and contractors are made aware of the OH&S Policy, its objectives and performance requirements with regard to the OHSAS 18001 standard.

It will be the responsibility of the Department Heads, Supervisors and/or the Health and Safety System Supervisor to identify any training needs that may be required for employees whose work may have a significant associated OH&S implication. Training will be implemented by a documented training programme for all employees.

It is the responsibility of the Department Heads/Supervisors to ensure contractors and/or subcontractors are made aware of the relevant OH&S Management System requirements; Health, Safety and Welfare Instruction and any other provisions or instructions that might apply to work carried out at the Company's premises or other sites which are under Company control.

4.3 Consultation and Communication

The Company has established arrangements for receiving, documenting and responding to communications both internally and externally that can be considered to be an OH&S issue. All OH&S communications and documented responses shall be maintained as part of the OH&S Management System.

4.4 System Documentation

The Company's OH&S Management System incorporates the manual and documentation necessary to ensure that the system is managed in a controlled manner and that the OH&S Policy is followed.

4.5 Documentation and Data Control

OH&S Management System documents identify the appropriate organisation function or activity to which they are relevant and shall be approved by authorised personnel prior to issue. The Health and Safety System Supervisor will ensure that appropriate documents are available at their relevant locations.

Revised documents will be reissued and obsolete copies withdrawn. All obsolete documents and records within the OH&S Management System will be kept for a minimum of five years.

4.6 Operational Control

In accordance with the OHSAS 18001 standard where a significant Health and Safety risk has been identified, it is the responsibility of the Departmental Heads/Supervisors to ensure that a control instruction is produced which reduces the risk to an acceptable level. When necessary, competent assistance will be acquired to accomplish this.

The Company will introduce instructions and related documentation in order to maintain and continually improve performance or any functions, activities or processes that are relevant to the OH&S Management System. Documentation will be maintained to ensure that evidence is available to internal and external parties where appropriate.

4.7 Emergency Preparedness and Response

The Company has established instructions for the identification and response to potential emergency situations. After an emergency situation, accident or near miss the Company will if necessary review and revise the response instruction and emergency preparedness in light of the incident. The Company will test the practicality of the emergency instructions at least once a year.

5.0 CHECKING AND CORRECTIVE ACTION

5.1 Performance Measurement and Monitoring

The Company identifies as appropriate the responsibility of the Health and Safety System Supervisor with the assistance of the Departmental Heads/Supervisors to ensure that necessary controls, verification, measurement and testing are adequately coordinated and effectively performed within each department area.

Where an activity or area is identified as requiring control, consideration is given to any measurements or testing that may need to be carried out to ensure verification of compliance with relevant OH&S Policy or objectives within the OH&S Management System.

Test equipment is controlled and calibrated as necessary. Records of such verification are established and maintained. Monitoring is to be conducted where necessary in accordance with national standards and regulatory requirements in order to ensure that all legislative obligations are fulfilled. All monitoring data shall be maintained as OH&S Management System records for a minimum of five years.

5.2 Accidents/Incidents, Corrective and Preventative Action

The Health and Safety System Supervisor with the assistance of Department Heads/Supervisors will authorise and initiate investigations and corrective action as deemed necessary following an accident or incident. Preventative action will be taken when non compliance with a performance requirement is identified within the OH&S Management System.

Established instructions are followed to ensure that investigation and corrective action are carried out in the appropriate manner.

5.3 Records and Records Management

The Company has established and maintained instructions for the identification, collection, indexing, filing, storage, maintenance and distribution of all OH&S Management System records. These records will be held by the Health and Safety System Supervisor, either electronically or otherwise. Some documents may also be held by Department Heads/Supervisors.

Records are maintained to demonstrate compliance with the requirements of the Company's OH&S Policy and the OHSAS 18001 standard.

All records forming part of the OH&S Management System shall be retained for a period of five years, unless legislative requirements state a longer retention period for a particular type of record.

5.4 Audit

Periodic audits are carried out to verify that activities conform to the OH&S Management System objectives. Any non compliance which is highlighted by the audit will be discussed in the management review and appropriate corrective action documented and implemented.

The Health and Safety System Supervisor will establish and maintain an audit plan and identify specific activities and areas to be audited at various times of the year.

The auditors shall be independent of the activity or area being audited. All information generated from audits shall be retained as OH&S Management System records for a minimum period of five years.

6.0 MANAGEMENT REVIEW

The Health and Safety System Supervisor shall ensure that regular reviews of the OH&S Management System are carried out. The review will be conducted when deemed appropriate by the Health and Safety System Supervisor during the initiation of the OH&S Management System. Thereafter, the management review will be scheduled at the end of every audit cycle.

The review shall be carried out under the chairpersonship of the Directors.

The scope of the review shall include the entire Company, its activities, products and services.

The review may address the following issues:-

- Legislative, regulatory and other requirements.
- Suitability and effectiveness of the OH&S Management System and Policy, considering the need for continual improvement.
- Complaints from external and internal sources.
- Internal/external audit reports, findings, and relative corrective actions.
- New processes, activities or products.
- OH&S accident statistics and trends.
- Use of best available techniques for the prevention of accidents.
- The Company's performance with regards to the OH&S Management System when undertaking site work.
- The relevance of all objectives and targets.
- Corrective actions to be taken in accordance to the findings of the above issues.
- Any other aspect having an effect on the OH&S Management System or Policy.

The review will address the need for change to the Policy and objectives in light of changing circumstances and the commitment to continual improvement. Minutes of these meetings will be recorded and circulated.

Records of reviews are documented and retained for a minimum period of five years.