

Health and Safety Policy

1.0 INTRODUCTION

The following is a statement of the general Health and Safety Policy of M G Access Ltd.

2.0 GENERAL HEALTH AND SAFETY POLICY

2.1 Company Responsibilities

M G Access Ltd will take all reasonable and practicable measures to protect the health, safety and welfare of its employees at work, and to avoid exposure of other persons who may be affected by company operations to health and safety risks.

M G Access Ltd will provide a comprehensive and effective Safety and Loss

Control Program which applies professional management skills to the control of losses from personal injuries and illnesses, property damage, fires, cessation of operations, security losses, and any other consequences which may be detrimental to the efficiency or prestige of the company. All necessary efforts will also be made to comply with legislative health and safety requirements

2.2 Individual Responsibilities

Every manager with overall responsibility and authority for operating a facility, project, or activity will actively apply this policy for development and implementation of effective practices and programs for Safety and Loss control.

The company will provide managers with professional advice and counsel in meeting these obligations.

All employees are expected to cooperate and contribute toward the overall success of the program by performing their jobs in the safest manner prescribed and by conducting themselves in a way that enhances their personal safety and that of others.

M G Access Ltd will support at the highest level all individuals who endeavour to carry out the spirit of this policy.

2.3 Objectives

2.3.1 The objectives of this policy are:

- (a) To prevent injury to persons and damage to plant and equipment, and to prevent dangerous occurrences.
- (b) To identify potential losses to the business in order that they may be minimized.
- (c) To work to standards which meet all current and known legislative requirements and reflect good industry practice.
- (d) To continuously review and develop these legislative standards where changes in industry practice and technology occur.
- (e) To provide adequate direction and training to enable personnel to undertake their tasks in a manner consistent with this policy.
- (f) To identify potential health and safety aspects in projects and operations and to plan and engineer them to avoid and/or mitigate their effects.
- (g) To promote cooperation between management, employees, suppliers and contractors staff in the promotion of safety at all company work locations.

2.4 Extension of Policy

While it is permissible to develop procedures, instructions, etc., which are in keeping with policy objectives that may be necessary for implementation of this policy, this statement of general policy may be changed only as authorized by the Director of M G Access Ltd.

3.0 LEGAL OBLIGATIONS

3.1 Recognition of Obligations

M G Access Ltd recognizes the legal obligations placed on it by the Health & Safety at work Act of 1974.

4.0 CORPORATE ORGANIZATION AND RESPONSIBILITIES

4.1 Management

- 4.1.1 The Director of M G Access Ltd is responsible for ensuring that a comprehensive, effective, up to date company health and safety policy is in place. It will be reviewed annually and amended if there is a significant change
- 4.1.2 The Director will approve the Health and Safety Policy by signing the general statement in part one of the document and this part will be brought to the attention of all employees.
- 4.1.3 The Director will arrange for an effective monitoring system so that company policy is properly implemented.
- 4.1.4 The Director will assign responsibility for all construction activities to the Manager at that construction site.

4.2 The Work Place Level

4.2.1 Senior Representative

The senior management representative at a work place is responsible for the practical implementation of the requirements of all relevant health and safety legislation. He shall comply with the requirements of M G Access Ltd Policy, Procedures and Methods, and where applicable, Client rules in health and safety matters.

4.2.2 Managers and Supervisors

Each Manager and Supervisor is responsible for seeing that the activities under their control are carried out in accordance with relevant health and safety legislation and M G Access Ltd Policy, Procedures and Methods and, where applicable, Client rules in health and safety matters.

4.2.3 Engineering Discipline

Each Chief Engineer or other lead engineer is responsible for ensuring that designs, drawing and technical documentation produced by them, or by those under their control, are to current standards of good engineering practice, and take account of the health and safety of those subsequently involved in the construction, start-up and operation of the plant/facilities involved, as well as all others who could be affected.

4.2.4 Office Safety

Procedures will be established for safe and healthy working conditions in each office and for effective maintenance of the same.

4.2.5 Maintenance Operations

These operations take place in operating plants or facilities of other companies. The hazards to which M G Access Ltd employees are exposed are no different than those of the parent company and include the specific ones associated with maintenance of equipment which may have been in contact with hazardous materials.

The Manager in charge is responsible for ensuring that all maintenance employees receive proper training as well as relevant information supplied by the operating company on the hazardous materials involved and the required safe working procedures to follow including familiarization with all emergency procedures.

4.3 Individual

4.3.1 Individual Responsibility

It is drawn to the attention of all employees engaged at their premises that they should become familiar with and observe the Health and Safety Procedures applicable to those premises.

4.3.2 Reasonable Self-care

Each employee is required by law to comply with OSHA standards and has a statutory responsibility to take reasonable care of themselves and others who may be affected by his/her actions while at work. In addition, the employee is required to cooperate with M G Access Ltd in implementing the requirements of all relevant health and safety legislation. The employee must not interfere with or misuse anything provided by M G Access Ltd in the interest of health, safety or welfare.

4.3.3 Fault Reporting Obligation-Reporting Unsafe or Unhealthy Conditions, the Manager will set up a procedure for all locations under his control to encourage the reporting and correction of all unsafe or unhealthy conditions.

Each employee must report without delay to his/her immediate supervisor, any fault or defect in M G Access Ltd activities and equipment which comes to his/her notice and could give rise to dangers to health and safety.

4.3.4 Instruction and Training

Employees at all levels will receive appropriate instruction and training to enable them to carry out their responsibilities for health and safety at work. It is drawn to the attention of all employees engaged at their premises that they should become familiar with and observe the Health and Safety Procedures applicable to those premises.

5.0 HEALTH AND SAFETY ORGANIZATION

5.1 Company Health and Safety Organization

For M G Access Ltd organization of Operational responsibilities, including those for Health and Safety, refer to company organizational charts.

5.2 Safety Council for each Operations Centre

5.2.1 Initiation of action and monitoring in respect of Health and Safety will be coordinated by a Safety Council chaired by the Director.

5.2.2 The Safety Council meets regularly to:

- (a) Review and update M G Access Ltd procedures and methods relating to health and safety.
- (b) Monitor implementation of procedures at all locations under the control of M G Access Ltd.
- (c) Review arrangements for the health and safety of M G Access Ltd employees at establishments not under the control of M G Access Ltd.
- (d) Review trends and reports and, where necessary, initiate and confirm appropriate action.
- (e) Determine any policy and further action required in respect of legislation or other requirements.
- (f) Initiate audits of conformance to health and safety procedures.

5.2.3 The Safety Council shall consist of: The Director, as chairman and the various site Managers.

5.3 Emergency Planning

The Director must ensure that at each and every location where M G Access Ltd employees work there are in place procedures to deal with emergencies, their reporting and correction, and evacuation, all of which are made known to all affected. In the case of leased accommodation, where the responsibility lies with the landlord, M G Access Ltd will confirm that satisfactory emergency procedures exist, and that all employees are made aware of them.

On construction sites, where the client is the owner, site emergency procedures may already exist. These may require supplementation with construction site emergency procedures, and the combined procedures made known to all employees and subcontractors.

5.4 Noise Control and Hearing Conservation

M G Access Ltd follows the requirements in requiring, both in offices and on construction sites, adherence to national noise control standards and employee hearing conservation policies. This is to be followed in all locations by all employees.

5.5 Company Reviews of its Designs

M G Access Ltd will implement set and approved design safety review procedures and installation checks as appropriate so that all plant, equipment, structures or other articles for use at work have been designed, manufactured and supplied to clients such that they are, as far as is reasonably practicable, safe and without risks to health when properly used.

5.6 Safety Group

5.6.1 M G Access Ltd will employ competent safety personnel available to each of the operating units. They shall be

responsible for advising management on all aspects of safety, reviewing safety procedures in all projects, monitoring safety standards of subcontractors, liaison with clients and statutory authorities and keeping M G Access Ltd informed of changes in legislation or safety standards.

5.6.2 In addition, M G Access Ltd will appoint or employ first aiders and other requisite medical personnel and arrange for the provision of fire marshals as required for the protection of its employees.

5.7 Liaison with Clients

M G Access Ltd will liaise and cooperate closely with clients on all matters relating to health and safety at work. Two aspects must receive special attention. In projects where the clients facilities come, or will come into contact with Hazardous Chemicals, the client will be responsible for the final documentation identified in the rules, M G Access Ltd will normally have prepared much of this during the execution of the project. There are also special rules governing contractors employed on site which must be followed.

5.8 Suppliers and Sub-Contractors

Suppliers and sub-contractors will be reminded of their statutory responsibilities for health and safety at work. Additional rules and standards will be set by M G Access Ltd as and when deemed necessary.

5.9 Health and Safety Audits

This policy will be reviewed regularly at no greater intervals than annually. Regular auditing will take place at each location of all Health and Safety functions, to ensure compliance with all legal obligations and maintenance of a high standard work environment for all employees. The Senior Vice President for each operations centre will set a program for their completion at regular intervals not exceeding 12 months, and will monitor their findings and completion of any required action within two months from publication.