



Peel Ports Group



Corporate Health and Safety Policy Statement

March 2010

CORPORATE HEALTH AND SAFETY POLICY STATEMENT

Peel ports recognises and accepts its responsibilities in terms of the Health and Safety at Work Act 1974.

Peel Ports considers that the best interests of the Group and of its employees are served by a positive approach to health and safety by management and employees. This will help to prevent work-related accidents and ill health as well as damage to plant, equipment, cargo and the environment and this ensures continuing prosperity for the Group and its employees.

It is the duty of Management at all levels to consider health and safety during the policy decision making process and to promote the port industry best practice in the planning and execution of all activities to ensure the implementation of safe systems at work by employees. Management will consult with employees and their representatives on their health and safety concerns, and in particular in the development and review of safe systems of work.

All personnel will, in the course of their employment, be trained to identify and to eliminate or control the effects of hazards in their area of work. All employees must conduct their tasks according to the Group's procedures and statutory rules and regulations in such a way as to prevent accidents, damage to installations, equipment, facilities and the environment in general. In particular it is the duty of all visitors, customers and the public in general. All sub-contractors, other workers and visitors to Peel Ports dock estates will be expected to comply with Peel Ports requirements in relation to health and safety matters.

Peel Ports are fully committed to continuous improvement in matters concerning health and safety and will work to achieve this through setting objectives and targets which are both achievable and quantifiable.

This Policy Statement applies to every employee of Peel Ports; in your own best interest, and that of your fellow employees, I require you to make yourself thoroughly aware of its content, adhere to it at all times and assist me in its implementation.

The responsibility of planning, monitoring and verifying adherence to the Peel Ports' Health and Safety Policy Statement has been delegated to the Managing Directors, Senior Managers, Health and Safety Managers, Supervisory Managers and Safety Committees already in place.

Chief Executive



Date: 4th March 2010

Issue Number

Principles

People are the most importance asset of Peel Ports therefore, the health, safety and welfare of Peel Ports employees, contractors, visitors and clients are of prime importance.

We will aim to achieve our safety objectives through our belief that:

- Effective management of health and safety enhances business performance.
- Both management and employees have responsibilities in the avoidance of incidents.
- All foreseeable injuries and occupation illnesses are preventable.
- Effective control of hazards is achieved through well-trained employees adhering to safe systems of work that are based on risk assessment.
- Analysis of accidents, incidents and dangerous occurrences and implementation of consequent changes minimises the likelihood of future similar occurrences.
- Full compliance to all relevant legislation is the minimum acceptable standard.

Group Commitments

Peel Ports will ensure that:

- The Chief Executive Officer has specific responsibility for health and safety; he will delegate authority for the implementation of Group policies to his Managing Directors, Senior Managers, Health and Safety Managers and Supervisory Managers.
- Risk-assessed safe systems of work are in place for all potentially hazardous activities, and are properly supervised at all times.
- Competent people are appointed to assist in meeting relevant statutory duties including, where appropriate, specialists from outside the organisation.
- Arrangements are in place to ensure that employee representatives are consulted and have the opportunity to raise concerns on matters relating to health, safety and welfare.
- Adequate facilities are maintained for employee health, safety and welfare.
- Each employee is given such information, instruction and training as is necessary to enable the safe performance of work activities.
- All employees are made aware of the arrangements for their health, safety and welfare.
- These arrangements are regularly monitored and reviewed to ensure that they are effective.

Managing Director's Responsibilities

- Managing Directors will oversee the management of all health and safety matters within their Divisions.

Senior Manager's Responsibilities

Senior Managers Will:

- Report to the Managing Director on all matters concerning health and safety in order that they may keep the Executive fully conversant with the implementation of group policies.
- Supervise and implement all Group policies concerning Health and Safety.
- Ensure that their Managers and Supervisors receive their full support in the implementation of Group policies.
- Ensure that all their staff receive such training as is required to enforce Group policies.
- Ensure that all Contractors, and Sub-Contractors they intend to engage are fully conversant and compliant with Group policies.
- Chair Safety Committee meetings.
- Ensure that all relevant risk assessments are undertaken.

Health and Safety Managers

Health and Safety Managers will:

- Advise as appropriate Managing Directors, Senior Managers and Supervisory Managers and employees on Health and Safety matters.
- Ensure all accidents are reported immediately and investigated.
- Ensure that all statutory documentation which may be required in the event of an accident or dangerous occurrence is completed as soon as possible and forwarded to the Safety Manager.
- Encourage the use of Hazard Observation Reports and implement any necessary remedial action highlighted by such reports as soon as possible.
- Provide feedback to any employee making a Hazard Observation Report.

- Ensure consistent implementation of Group Health and Safety Policy.
- Ensure Health and Safety induction training is given to all new employees, that refresher training is given at regular intervals for existing employees and specialist training is made available to those who require it in the course of their employment.
- Co-ordinate all company Health and Safety activities.
- Arrange Health and Safety audits and inspections.
- Investigate Accidents, Incidents and Dangerous Occurrences; Maintain records of these and provide analyses to Managing Directors.
- Liaise with Health and Safety Executive and other enforcing Authorities.
- Report monthly on Health and Safety performance.
- Attend Safety Committee meetings.
- Undertake risk assessments.

Supervisory Managers Responsibilities

Supervisory Managers will:

- Assist Senior Managers in the implementation of all Group Health and Safety Policies.
- Ensure safe systems of work are included in work instructions and implemented by employees.
- Ensure that all accidents or dangerous occurrences are reported to Senior Managers as soon as possible after they occur.
- Ensure suitable Personal Protection Equipment is available as required and properly used.
- Prevent employees from taking risks and ensure that safe systems of work are used at all times.
- Ensure plant and equipment is safe and suitable for the task, is operated only by authorised competent personnel and left safe and secure after use.
- Ensure defective equipment is taken out of service and properly repaired before putting it back into use.
- Encourage the completion of Hazard Observation Reports and ensure they are entered onto the Group system as soon as possible after they are raised.
- Attend Safety Committee meetings.

Employee Responsibilities

Employees will ensure that:

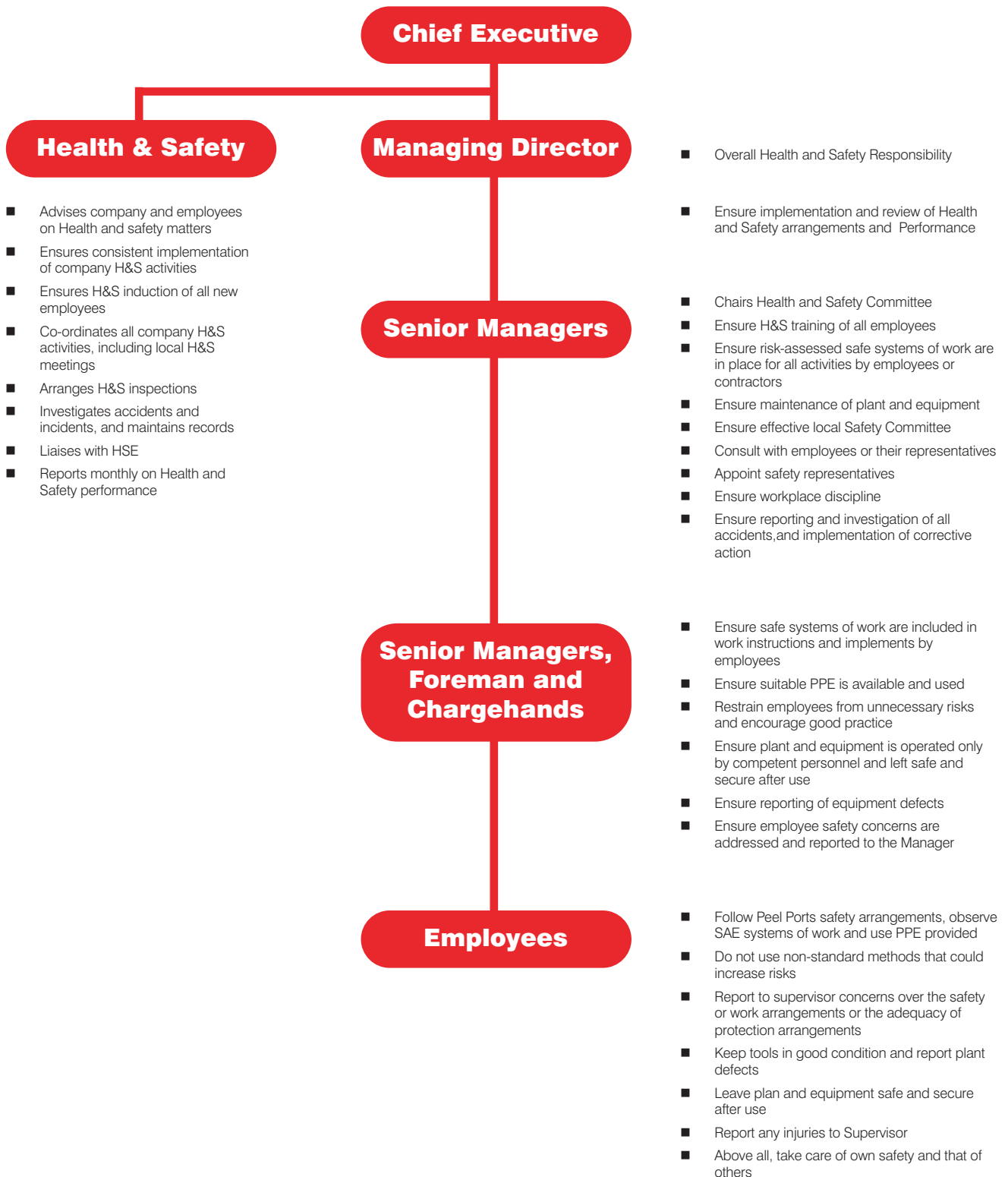
- They are fully conversant with the Group Policy on Health and Safety, its organisation and arrangements.
- They co-operate with management to ensure compliance with all statutory duties.
- They take reasonable care of their own health and safety and the health and safety of others who may be affected by what they do, or what they fail to do.
- They do not interfere with any equipment, provided by the Company for the implementation of its duties under health and safety.

Organisation, Arrangements and Polices for Health and Safety

Details of the organisation, arrangements and polices for health and safety are set out in the remainder of this document.

ORGANISATION FOR SAFETY

The diagram below, which sets out the principal responsibilities for health and safety within Peel Ports, shows how every Peel Ports employee can contribute to the health and safety of themselves and others.



Health and Safety responsibility for all management and supervisory posts are detailed in the relevant job descriptions.

HEALTH AND SAFETY ARRANGEMENTS

Comprehensive health and safety arrangements are in place.

Risk Assessments

Risk assessments are performed on all operational activities to support the relevant safe system of work.

Assessments will be carried out by the relevant Line Manager with the assistance of the Safety Manager who will advise on content.

A standard risk assessment format is used for all operational and maintenance activities however, there are specific risk assessment forms for the following.

- Display Screen Equipment
- Manual handling
- Control of Substances Hazardous to Health (COSHH)

Safe systems of work include control measures to minimise the risks to employees and others, and include details of any personal protective equipment to be used.

These are available in the Group I.T. Network, located in the Safety Documents section, under the relevant operational location.

Risk assessments are reviewed annually, or whenever there is a significant process change or new equipment is introduced.

Consultant with employees

The Company supports the appointment of safety representatives from among employees and will facilitate training in their responsibilities.

All reasonable assistance will be given for representatives to carry out their duties.

Safety Committees, as established, at the principal operation locations, consist of management and employee representatives and meet at quarterly intervals. They will advise management on all matters relating to safety. The responsibility for the making of decisions in these matters will, however, remain with management.

Information and instructions

Information relevant to the employee's health and safety is included in the induction pack and is supplemented by the provision of safe systems with job instructions, toolbox talks, safety flashes with pay slips etc. The statutory HSE posters are displayed at all locations.

Employee Supervision

Supervisory staff are responsible for ensuring that personnel allocated to tasks are adequately trained to undertake them safely, that safe systems of work are available and that they are implemented.

They are expected to encourage good practice and ensure that employees do not take risks.

They must also ensure that operator concerns regarding safety are addressed and reported to management, and that accidents and dangerous occurrences are reported.

Management and supervisory staff are given the necessary safety training to enable them to understand the hazards and effectively control the areas for which they are responsible.

Group Polices and Procedures

Group policies and procedures are contained in subsidiary documents an index of which is presented below.

Index of Safety Policies and Procedures
Training Police
Drugs and Alcohol
Accident Investigation
First Aid
Whole Body Vibration
Noise
Hand Arm Vibration
Visual Display Units
Legionella Testing
Pregnancy
Stress
Managing Sickness Absence
Sun Protection for outdoor Workers
Dermatitis
COSHH
Manual Handling
Working Hours
Emergency Procedures
Fire Safety
Personal Protective Equipment
Maintenance Plan & Equipment
Lifting Plant and Lifting Equipment
Confined Space Work
Contractors and Subcontractors Code of Safe Practic
Visitors
Diving Operations
Work at Height
Hazardous Cargo
Radioactive Cargo
Asbestos
CDM
Driving
Engineering and Electrical
Environmental
Waste Management
Haulage/HGV
Dusty Cargoes
Occupational Asthma and Work Related Skin Disease
High Winds
Occupational Health/Medicals
Port Marine Safety Code
Cholesterol
Smoking
Night Workers
Disabled Workers
Young Persons