KEEJAYS LIMITED

HEALTH AND SAFETY AT WORK ACT 1974 - General Statement of Policy

1. This document runs to a number of pages and is quite detailed. It is a measure of the importance the Company places on the active prevention of accidents and ill health and it is accordingly the Company's policy to ensure so far as is reasonably practicable, the health, safety and welfare of its employees.

2. The Company will, through its professional advisors, retained for this purpose, endeavour to keep up-to-date with current requirements on health and safety matters. Observe all relevant Statutes, Regulations and Codes of Practice. Review problems and hazards both observed by and reported to members of Senior Management and ensure risk assessments are conducted and acted upon in all relevant matters.

3. The Company is aware of its responsibilities under COSHH regulations and will ensure registers and data files of appropriate materials are maintained at each of its sites and necessary precautions identified are taken.

4. The Company will, through its training policy, ensure that all employees are instructed in health and safety procedures and fire precautions and that Supervisors and Managers with health and safety responsibilities are adequately trained to meet these responsibilities. Also that adequate training is given in the use of all equipment used on the premises with specific reference to health and safety, the provision of First Aid, and the importance of machine guarding.

5. The Company will ensure through its hazard reporting scheme and quality control or other communication channels that a constant watch is kept on health and safety matters as they affect day-to-day operations in the workplace.

6. Safety is everyone's business and relies on the vigilance and conscientiousness of all employees.

Signed ....................................................................

Managing Director

Health & Safety Policy Organisation and Arrangements

The Directors of the Company attach great importance to the health, safety and welfare of their employees at work.

The promotion of health and safety at work is regarded as common object for both management and employees. The duties under the Health &amp; Safety at Work Act 1974 and consequent legislation will be met as follows:

1. Managing Director – J S Lee

The Managing Director has overall responsibility for ensuring that the workplace is safe and that health and safety is regarded on an equal footing with quality, productivity and profit.

In particular he will ensure that:-

a) there is a proper health and safety policy.

b) health and safety organisation and arrangements adequately outline the areas of responsibility.

c) the Company complies with current UK and EEC legislation relating to health and safety.

d) the Company carries out an annual Risk and Hazard Assessment which will include manual handling, VDU's and substances hazardous to health and that suitable measures are taken to reduce identified risks.

e) the processes, storage and handling of potentially hazardous substances are analysed to ensure minimum risk of exposure to personnel and to ensure that personnel exposed to any such risk are adequately protected. Particular care will be taken with the introduction of new substances and the risks will be assessed as required. This data will be made available to all employees having a legitimate need for such information.

f) the Company considers environmental issues as they affect employees; the workplace; the public and the environment addressing related matters as required; risk assessments are carried out to ensure care is taken to avoid pollution by smoke, fumes, dust and/or noise to air, water and ground surfaces and that statutory and advisory requirements are complied with and appropriate licensing and authorities are obtained.

g) suitable financial provisions are made to ensure that sufficient and adequate training is carried out in health and safety matters to enable those responsible to fulfil their responsibilities.

h) suitable financial provisions are made for the introduction or upgrading of the existing health and safety equipment.

i) where appropriate, a safety committee is set up and afforded time and facilities to meet and consider matters related to health and safety. That the effectiveness of such committees is monitored by the issue of minutes.

j) where applicable, a system exists that will control exposure to radiation to within the limits imposed by 'The Ionising Radiation Regulations 1985' (see paragraph 11, page 7).

k) all hazard reports and, where appropriate, minutes of safety meetings are seen by the Managing Director and matters arising, dealt with to his satisfaction.

2. Food Safety Manager

Mr Americo Nunes is directly responsible for health and safety matters within their own areas of control.

In particular, he will ensure that:-

a) the processes and functions are carried out in a healthy and safe manner.

b) an annual Risk and Hazard Assessment is undertaken as defined above.

c) adequate supervision is provided.

d) sufficient training in healthy and safe methods of operating the various functions and processes is provided. In this respect particular attention will be paid to the training of new employees.

e) the Safety Handbook covers good working practices as specific rules designed to eliminate risks.

f) appropriate disciplinary action is taken against employees who do not comply with health and safety rules.

g) he will report any accident or "near miss" to the appropriate authorities.

h) he will carry out a full investigation of any accident or "near miss" and complete the hazard/accident report form - see item 15 &amp; Appendix II which is copied to the Managing Director.

i) regular inspections are made of all equipment and machinery and that any faults or problems arising from them are rectified.

j) he will respond to any matters relating to health and safety which have been raised by the employees.

k) he is the principle point of contact with the Health and Safety Executive.

l) any Personal Protective Equipment supplied is adequate and conforms to EEC standards.

3. Production Manager

Mr J M Lee has special responsibilities in connection with health and safety.

In particular he will ensure that:-

a) production processes are designed specifically to minimise exposure to potentially harmful substances by the use of applicators or other mechanical means.

b) adequate systems of ventilation or extraction are built into process design

c) frequently repeated movements which could give rise to repetitive strain injuries are, as far as is reasonably practicable, designed out of processes.

d) process design eliminates, as far as is reasonably practicable, the need for manual handling.

4. Supervisors

As First Line Managers, Supervisors work very closely with operators and therefore have very specific responsibilities for health and safety matters on a day to day basis.

In particular, they will ensure that:-

a) employees work in strict compliance with health and safety rules and procedures.

b) they provide adequate close supervision of their workforce.

c) all their workforce are properly trained in the healthy and safe methods of carrying out each process required of them.

d) safe methods of working are given equal importance to productivity and quality.

e) no new employee or existing employee engaged on a new operation is left to work without direct supervision until the supervisor is completely satisfied that the operator is fully competent to carry out the work in a safe manner.

f) informal disciplinary action is taken against employees who do not comply with health and safety rules and where such employees persist in non compliance, they make adequate recommendations to their Line Manager for formal disciplinary action to be taken.

g) being aware of the potential hazards caused by certain chemicals and substances used in the processes or systems which they operate and being aware of the emergency procedures to be implemented in the case of fire or spillage.

h) they report any potentially unsafe piece of equipment or working practices to Line Management together with recommendations for safety improvements.

i) health and safety is discussed on a regular basis with employees within their own department and where appropriate, Supervisors will co-operate with members of the Safety Committee.

j) all employees are aware of the potential dangers and hazards associated with such products as solvents and glues or other substances used in the normal manufacturing or operational processes.

k) all employees wear the appropriate safety and protective clothing and use the relevant safety measures.

5. Maintenance Staff

Maintenance staff have a specific responsibility in relation to health and safety, particularly where items of equipment of a mechanical or electrical nature are being repaired or commissioned. It is the responsibility of maintenance personnel to ensure that all equipment, both electrical and mechanical, is operating in a safe manner before being handed back to other employees to operate.

The Production Manager is responsible for ensuring that visiting contractors are aware of and comply with Appendix I, Safety Regs applying to visiting contractors. This particularly applies to items 5 and 6 'Do Not Operate' and 'Signing Off'.

The maintenance function is also responsible for ensuring that all portable electrical appliances are tested on an annual basis and that a record is kept of such tests.

6. Employee Responsibility

It is the duty of all employees to exercise personal responsibility and to do everything within their power to prevent injury to themselves and others, including:

a) Working safely and efficiently by using the personal protective clothing and equipment provided and meeting any relevant statutory requirements by ensuring the equipment and materials provided are appropriate and safe.

b) Adhering to health and safety rules and procedures, including providing adequate warning of hazardous areas to other staff and the public.

c) Reporting, as soon as possible, incidents or defects that may have led or may lead to injury, utilising the hazard reporting detailed at paragraph 19.

d) Co-operating in the investigation of accidents to aid prevention of a re-occurrence.

e) Familiarising themselves with the contents of notices indicating the emergency procedures situated around the premises.

f) Undergoing suitable and appropriate training to fulfil their responsibilities as employees.

All employees are expected to familiarise themselves with the emergency procedures, the fire fighting equipment and fire exits.

Whenever anyone notices a health or safety problem which they are not able to put right immediately, they must tell the safety representative or other persons named above or their deputy, and/or put into operation the procedure shown at 19.

7. General Safety Responsibilities

Other safety-related responsibilities are as follows:

Task Responsible Person(s)

Fire Safety Observation All employees

Maintaining employee register Supervisors

Carrying out safety inspections and ensuring machines

are properly guarded J M Lee

Investigating accidents and monitoring Hazard Reports M Wright

Monitoring maintenance of plant, equipment

and procedures including alarm and smoke detector

tests, sound level monitoring, fire drills,

extinguisher servicing etc.) and ensuring

premises are safe for employees and public M Wright

Ensuring employees are properly trained and that

personal protective equipment is correctly issued

and kept in good repair. M Wright

8. Fire

All employees should familiarise themselves with the fire precautions shown below and other precautions which are posted from time to time on the Notice Boards.

a) On discovery of fire, take the appropriate action according to site requirements.

b) Use fire fighting equipment at hand for localised fires only.

c) All persons not engaged in fire fighting must evacuate the building immediately and assemble for roll call as directed in the Fire Instructions on the Notice Board.

9. General Fire Safety

Specific responsibilities for fire protection are as follows:

Person

Responsible

Action for Checking Frequency

Escape Routes/Drill M Wright Monthly

Fire Extinguishers M Wright Monthly

Fire Exits M Wright Daily

Assembly Point M Wright Quarterly

10. Accidents

In the event of an accident, you should immediately contact your Supervisor or Line Manager. In the absence of either, bring this matter to the attention of the Operations Manager.

You must complete a hazard report form (Appendix II) following the accident or 'near miss' to help prevent a re-occurrence. See paragraph 19.

All persons should familiarise themselves with the location of First Aid boxes and the names of any appointed persons.

The Operations Manager is responsible for the location of First Aid boxes and their contents.

The Accident Record Book is kept by:

Mark Wright

11. Emergency Services

Emergency Services should be requested when it is decided that a situation cannot be dealt with internally. Such requests should be made via the switchboard but if this is not possible, dial 999.

12. Advice and Consultancy on all Safety-related Matters

Company Health & Safety Professional Personnel Consultants Ltd

Consultants: Enterprise House

Great North Road

Little Paxton

Cambs PE19 6BP

Tel: (01480) 474740

Authorities: Health &amp; Safety Executive

Environmental Health Officers

39 Baddon Road

Chelmsford, Essex CM2 0HL

Tel: 01245 706200

13. Special Training

The Operations Manager is the person designated to deal with health and safety training matters and he shall ensure that all persons involved or included under changing or new legislation are put forward to receive appropriate training in these matters. Such subjects might include:

Electricity Regulations

COSHH Regulations

New First Aid Requirements

Other Statutory Requirements as determined by changing legislation

Manual Handling

Visual Display Equipment

Personal Protective Equipment

14. Contractors and Visitors

All visitors, including contractors visiting our premises must comply with the Company's safety requirements. Site Managers, or other responsible persons, should ensure that the site rules for Visitors, Temporary Workers and Contractors (sample attached hereto - Appendix I) are issued to all such persons who enter the premises.

15. Housekeeping and Premises

All employees are required to:

a) Keep their place of work neat and tidy at all times and free from potential hazards, e.g. materials or unfinished products left untidily, trailing extension cables, filing cabinets left open, sharp objects, inflammable liquids, and incomplete repairs.

b) Ensure that the storage of any items located above ground level is achieved neatly and safely so as not to represent a hazard to others. This includes the storage of materials or supplies in racking.

c) Maintain passages, gangways and exits, ensuring that they are clear of any obstructions. Fire Exits and routes both inside and out must remain clear at all times.

d) Report any hazards (including near misses that do not actually result in injury or damage) to the person named in Paragraph 2 and/or 3. You should also use the hazard reporting system as in Paragraph 19 (also see Appendix II).

e) Ensure that all chemicals and materials used are clearly identified and labelled and that suppliers/makers data sheets are available to all who may need them. If you have any doubts about this or chemicals and processes you use, you should report them to the person named in Paragraph 2.

16. Technical

All employees must comply with the following instructions:

a) The operation of any electrical, mechanical or other equipment must only be undertaken when authorised to do so and having received the appropriate training.

b) All manufacturer's, supplier's and Company instructions must be adhered to when using lifts, hoists, cranes and other electrical or mechanical equipment.

c) All machinery or equipment being maintained (or in a dangerous/defective state) must be isolated and labelled clearly to show this. Machinery that has been repaired must not be operated until it has been 'signed off' by the engineer or contractor and you are notified that it is safe to use.

17. Hazard Reporting

All supervisors, departmental heads and managers have available special hazard reporting forms (Appendix II). Please take a few moments to report any incident that requires attention, using this system. Matters requiring urgent attention should obviously also be reported verbally. The Company safety representative will investigate any matter reported, but make sure your Supervisor or Manager also knows.

18. Inspections

The Company will arrange for regular inspections of fork lift trucks, refrigeration and compressors etc., and for any remedial work to be carried out to the insurer's (CGU) satisfaction.

19. Safety Audits

This policy and associated procedures are ineffective unless adhered to. In order to ensure this, regular inspections/audits will be carried out by the Company's safety representative and/or professional advisors. Advice and guidance may be given at the time of such a visit and should be acted upon. Disputes should immediately be referred to the Managing Director for a decision.

A confidential report covering any such inspection by an outside agency will be sent to the Managing Director. Transgressions of Company safety policy and practice will be dealt with as a disciplinary matter.

Signed:..................................................................Dated: .....................................................

(Managing Director)

CCN/JAH/06.12.00

APPENDIX I

SAFETY REGULATIONS APPLYING TO CONTRACTORS, VISITORS AND

OTHER TEMPORARY STAFF AT SITES OPERATED BY

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1. Application

This document is intended for use by temporary staff, visitors or contractors and those working for or through a contractor.

2. Contractors

It is a condition of the granting of contracts or orders for work to be carried out that the conditions in this document are observed.

It is the Company's declared intention to safeguard the wellbeing of its own employees and members of the public and where this is considered to be threatened by visitors to the site, the Company will evict transgressors and, in serious cases, could suspend a contract pending correction of an unsafe situation/working practice.

Contractors are asked to read the attached conditions carefully and bring them to the attention of all who attend our premises in connection with the contractor's work for the Company.

3. Temporary Staff

Staff employed on a temporary contract are expected to conduct themselves within the confines of the Company's Health and Safety at Work Policy, paying particular attention to the use of equipment, moving around the premises, the operation of machinery and equipment and being suitably and safely attired for the job. They must also pay attention to regulations brought to their notice either by signs or verbally.

Failure to comply with these standards will result in removal of offenders from the premises and advice to the agency concerned (if applicable).

4. Visitors

No unaccompanied visitors will be allowed on the Company premises. Those persons attending in the company of an employee of ..................................................... will be asked to show courtesy and observe requests made by their hosts, particularly in relation to safety matters.

5. Service Engineers

Those visiting the Company's premises to service equipment must ensure that the 'Out Of Order' or 'Do Not Operate' signs remain in place on faulty equipment until it is repaired and signed off as fully operational.

6.Signing Off

Visiting service engineers must ensure that the Production Manager signs off their maintenance schedule/job ticket, showing that the machine/equipment is repaired/modified and ready to operate. It is the responsibility of the Production Manager to remove 'Out Of Order' signs, thus authorising the re-use of the equipment in question.