

**ALTUS UK LLP
TRADING AS ALTUS ANDREWS**

**HEALTH, SAFETY AND
ENVIRONMENT POLICY
AND ORGANISATION AND RESPONSIBILITY**

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STATEMENT OF INTENT

Altus Andrews is committed to conducting its business in a way that protects the health, safety and welfare of its employees, contractors, visitors and the general public. It recognises its responsibility to protect the environment and minimise as far as reasonably practicable, any environmental impact of its activities.

Consistent with this, Altus Andrews will:

- ④ provide leadership, direction and adequate resources to implement this policy
- ④ provide and maintain a safe and healthy working environment including the provision of safe equipment and systems of work
- ④ establish health, safety and environmental management arrangements which comply, as a minimum, with applicable legislation and associated standards
- ④ ensure health, safety and the environment are management responsibilities which rank equally with responsibilities for managing finance and other similar matters
- ④ support employees and contractors in understanding and fulfilling their health, safety and environmental responsibilities
- ④ engage, involve and consult employees and contractors in the improvement of health, safety and environmental performance
- ④ require contractors and suppliers to demonstrate an acceptable standard of health, safety and environmental performance
- ④ maintain effective systems to identify health, safety and environmental hazards, assess them and manage risks arising from all our activities
- ④ work with employees, contractors, external bodies and enforcement authorities to minimise the health, safety and environmental risks associated with our operations
- ④ provide relevant information, training and supervision to all employees in respect of risks to their health and safety, and the environment, which may arise out of their work or their work place
- ④ comply with the letter and spirit of relevant health and safety, and environmental law, and where legislation does not exist, set standards reflecting best industry practice in comparable activities
- ④ reduce where reasonably practicable, consumption of energy and the production of waste
- ④ conduct activities in such a way as to minimise damage to the environment
- ④ provide and maintain adequate emergency procedures, and ensure that any health, safety or environmental incident is reported and appropriately investigated
- ④ measure and review our health, safety and environmental performance and audit our health, safety and environmental management arrangements as a means of planning continual improvement in health, safety and environmental performance

Employees are aware that it is everyone's responsibility to take care of themselves and others when at work and that their support is vital to achieve the objectives of this Health, Safety and Environment Policy. Neglect of health, safety and environmental requirements will be taken seriously and could give rise to disciplinary action.

Assistance and advice on all health, safety and environmental issues is provided by the Health & Safety department of Altus Andrews, as required.

This policy will be reviewed as and when necessary but not less frequently than annually.

Ultimate responsibility for health, safety and the environment within Altus Andrews lies with Simon Maidlow Director.



Signature.....

Date...8 July 2008.....

S Maidlow - Director

ORGANISATION AND RESPONSIBILITIES

SENIOR DIRECTOR

The Senior Director is ultimately responsible for the continual safe operation of the Company. He is also ultimately responsible for the health and safety of all individuals within the organisation and for ensuring that no harm is caused to the environment.

Duties arising from this responsibility have been delegated to Directors within the Company who monitor compliance with the Health, Safety and Environment Policy as set out in their individual responsibilities. They are as accountable for the management of health, safety and environment as they are for any other function of management.

DIRECTORS RESPONSIBLE FOR COMPANY OFFICES

Specifically Directors are responsible for:

- ④ ensuring adequate resources are available to meet the objectives of the Health, Safety and Environment Policy
- ④ understanding the application of the Health and Safety at Work etc. Act (1974), and other legislation relevant to Company business
- ④ administering and interpreting the effective implementation of the Health, Safety and Environment Policy within their relevant offices
- ④ implementing written health, safety and environment procedures and work instructions, and ensuring that such procedures and instructions are adhered to
- ④ ensuring that all premises and services present minimal risk to employees and all persons entering Company buildings
- ④ ensuring health, safety and environmental risk assessments for all activities are carried out and documented, and action plans developed and implemented
- ④ assigning responsibility for specific health, safety and environmental roles to competent persons
- ④ ensuring that there are adequate means of distributing and communicating health, safety and welfare information within the Company
- ④ managing and monitoring specific Company wide health, safety and environment operational arrangements, for example: evacuation procedures; Permit to Work; manual handling
- ④ ensuring that all the individuals in their areas of responsibility are adequately trained, instructed and competent with regards to relevant health, safety and environmental procedures, and that records of training and/or competence are kept
- ④ developing and implementing emergency procedures
- ④ ensuring that contractors working on Company premises work in line with Altus Andrews Health, Safety and Environment Policy and procedures
- ④ liaising with statutory and enforcing authorities
- ④ coordinating arrangements to manage waste for Company premises in accordance with current legal requirements
- ④ assisting the development of staff awareness of health, safety and environmental issues
- ④ maintaining health, safety and environment records including audit reports, accident records and training records
- ④ monitoring and reviewing performance and reporting findings to the Senior Director
- ④ setting a personal example at all times with respect to health, safety and the environment

EMPLOYEES

All employees are responsible for:

- ⓐ taking reasonable care in their actions to protect the health and safety of themselves, colleagues, visitors, contractors, the general public and the environment
- ⓐ setting a personal example with respect to health, safety and the environment, especially to junior staff
- ⓐ cooperating with Directors on health, safety and environmental matters
- ⓐ working in accordance with health, safety and environmental procedures
- ⓐ using equipment/machinery in a safe manner
- ⓐ not intentionally interfering with equipment or safety devices which would render the equipment or device unsafe
- ⓐ not improvising or taking shortcuts which would entail unauthorised or unnecessary risks
- ⓐ advising their manager of any health, safety and environmental concerns
- ⓐ reporting accidents, incidents, near misses and hazards, including ill health issues which may be work related
- ⓐ reporting any defects in equipment to their Director
- ⓐ suggesting ways of eliminating hazards to their Director
- ⓐ cooperating in the investigation of accidents with the objective of introducing methods to prevent reoccurrence

HEALTH AND SAFETY ADVISOR

The Health and Safety Advisor is responsible for:

- ⓐ providing health and safety advice to managers and employees in particular as a result of changes in legislation and best practice
- ⓐ liaising with statutory and enforcement authorities
- ⓐ undertaking accident investigations and ensuring that the enforcing authority is notified as necessary
- ⓐ assisting with the development of robust site emergency plans and crisis management procedures
- ⓐ reviewing the Company Health, Safety and Environment Policy at least annually and recommending amendments/improvements
- ⓐ developing and implementing written health, safety and environment procedures and work instructions
- ⓐ reviewing and recommending health, safety and environmental training requirements for all levels of employees within the Company, and developing staff awareness of health, safety and environmental issues
- ⓐ setting a personal example at all times with respect to health, safety and the environment

FIRE WARDENS

Lists of relevant Fire Wardens are displayed on Company notice boards. Appointed Fire Wardens are responsible for:

- ④ ensuring that fire prevention and fire fighting equipment e.g. extinguishers, fire blankets, procedures and notices are maintained, readily available and visible
- ④ informing new employees in their area of responsibility of fire arrangements
- ④ taking part in fire drills and evacuations as required
- ④ carrying out testing to ensure that fire alarms are operational
- ④ assist in the implementation of recommendations following any fire incident to prevent their reoccurrence

FIRST AIDERS

A list of relevant First Aiders is displayed on Company notice boards and all First Aiders are supplied with appropriately stocked first aid boxes.

Appointed First Aiders are responsible for:

- ④ ensuring that first aid facilities, equipment and personnel are readily available
- ④ carrying out first aid in accordance with The Health and Safety (First Aid) Regulations (1981) as amended
- ④ ensuring that all accidents and injuries, however slight, are recorded in the Accident Book
- ④ ensuring that first aid box items are re-stocked at regular intervals or when necessary
- ④ not stocking or dispensing any form of lotion or drug including aspirin
- ④ undergoing full first aid training and receiving refresher training every 3 years

APPENDIX 1 - ARRANGEMENTS

The following health, safety and environmental arrangements are in place within the Company and are reviewed on a regular basis:

- ⓐ General Safety and Working Conditions
- ⓐ Risk Assessments
- ⓐ Fire Procedures
- ⓐ Smoking Policy
- ⓐ Electrical Safety
- ⓐ First Aid
- ⓐ Incident Reporting
- ⓐ Manual Handling
- ⓐ Display Screen Equipment
- ⓐ Training
- ⓐ Control of Substances Hazardous to Health
- ⓐ Consultation with Employees
- ⓐ Pregnant Workers
- ⓐ Conditions for Visitors
- ⓐ Managing Contractors
- ⓐ Company or Private Vehicles
- ⓐ Working on Clients Sites
- ⓐ Lone Working

These arrangements are communicated to employees via memorandum, training sessions and notice boards.

RISK ASSESSMENTS

The Management of Health and Safety at Work Regulations 1999 includes a duty to carry out assessments of risk to ensure that a safe place and safe systems of work are provided. Altus Andrews regularly conducts and reviews specific and generic risk assessments with written records being kept. Risk assessments including manual handling assessments, COSHH assessments and Display Screen Equipment assessments are conducted by a competent person and communicated to appropriate personnel along with controls that must be put in place. Any actions required as a result of risk assessments are prioritised, implemented and their effectiveness monitored and reviewed.

FIRE PROCEDURES

- ⓐ Fire Risk Assessment
Fire risk assessments are undertaken for all Company premises and appropriate control measures put in place and maintained to minimise the risk of a fire occurring and its potential severity.
- ⓐ Emergency Procedures
Emergency Procedures are developed for each of the Company premises and are communicated to all personnel via handouts, notice boards and fire drills. Simple procedures setting out actions to be taken in the event of a fire are displayed in all offices.



Fire Wardens

A list of Fire Wardens will be displayed on each notice board within all Company premises. Fire Wardens are provided with appropriate instruction and training to be able to carry out their duties effectively.

SMOKING POLICY

Altus Andrews operates a **NO SMOKING** Policy within Company premises.

ELECTRICAL SAFETY

The Company has a duty to ensure that compliance with the Electricity at Work Regulations 1989 is achieved. Detailed inspections of all electrical appliances and hardwiring are carried out at regular intervals and records kept. All portable electrical appliances are regularly tested by a competent contractor.

Users are encouraged to visually inspect electrical equipment and report any defects found. They are also instructed not to overload sockets.

FIRST AID

A list of qualified First Aiders is displayed on each notice board within all Company premises. First Aiders are provided with appropriate instruction and training to be able to carry out their duties effectively. All First Aiders are supplied with appropriately stocked first aid boxes.

INCIDENT REPORTING

All incidents are recorded in an Accident Book located in each of the Company's premises and investigated as appropriate under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)

MANUAL HANDLING

Information is provided to all employees on correct lifting techniques. No employee should attempt to lift anything which could result in an injury being caused. Instead they are asked to contact the health and safety department of Altus Andrews.

DISPLAY SCREEN EQUIPMENT

The Company ensures that Display Screen Equipment (DSE) Assessments are carried out of all workstations, and that any risks discovered are reduced to as low as reasonably practicable. These assessments are reviewed annually or if an employee's workstation or environment changes.

Employees are given training and advice in the correct set-up of their workstation and the need to take regular breaks or changes of activity.

Any employee who uses display screen equipment is entitled to a free eyesight test. The Company will also make a contribution to the cost of corrective appliances if the eyesight test reveals that they are necessary for the use of display screen equipment.

TRAINING

Training requirements for all employees are detailed in the Company's Training Matrix which is regularly reviewed and discussed with all employees at their annual appraisal.

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

COSHH Assessments are carried out for all substances used which are classified as hazardous to health, in line with the Control of Substances Hazardous to Health Regulations. If a product cannot be substituted for one which is less hazardous, appropriate control measures are put in place and communicated to all appropriate personnel.

CONSULTATION WITH EMPLOYEES

Altus Andrews acknowledges its responsibility to make available to all employees, information relating to their health and safety at work. In particular, consultation will take place over matters relating to:

- the introduction of any measure at the workplace which may substantially affect the health and safety of employees
- the arrangements for appointing or nominating persons in accordance with The Management of Health and Safety at Work Regulations (1999)
- any health, safety and environmental information required to be provided under the relevant statutory provisions
- the planning and organisation of any health, safety and environmental training
- the health and safety consequences of the introduction of new technology

All employees are actively encouraged to suggest ways that health, safety or environmental issues are managed within Altus Andrews. Employee's initiatives are dealt with by the Health and Safety Advisor.

PREGNANT WORKERS

It is the responsibility of employees to notify their direct supervisor when they become pregnant. A certificate confirming pregnancy issued by a doctor or midwife should follow this notification at the earliest opportunity.

Upon such notification it is the responsibility of the supervisor to carry out an assessment of the risks to the pregnant mother and her unborn child in line with HS(G)122 New and Expectant Mothers at Work – A Guide for Employers. The assessment should take into consideration general conditions of pregnancy i.e. morning sickness, tiredness, frequent visits to the toilet, general impairment of co-ordination, and reduced working speed and reach caused by expanding girth.

If a risk exists, one or more of the following actions must be taken:

- Alter her working condition or hours so the risks are avoided
- Move her to a different job, after assessing the new job as being without risk
- Suspend her on full pay except during the normal period of maternity leave

By the adoption of this policy, Altus Andrews considers it is fulfilling both its moral responsibility and its legal responsibility under The Management of Health and Safety at Work Regulations (1999) and The Suspension from Work (on Maternity Grounds) Order (1994).

CONDITIONS FOR VISITORS

In order to protect the health and safety of visitors to Company premises, the following conditions are in place:

- Ⓢ Visitors must be escorted at all times by an employee of Altus Andrews whilst on Company premises
- Ⓢ Whilst visitors are on the premises, their host is responsible for their conduct and safety in the event of a fire

MANAGING CONTRACTORS

The management of contractors brought onto site to carry out routine and non-routine operations forms an integral part of managing health and safety in the office.

Procedures to manage contractors working within the office or in the grounds on behalf of the Company are in place, are communicated to all contractors prior to work commencing, and compliance is monitored.

Prior to any work being undertaken, the health and safety record of any contractor proposing to work on the site is checked, and/or all contractors asked to submit detailed method statements and/or risk assessments as applicable for the work that they are proposing to carry out. These are reviewed by the Company and the contractor is only allowed on site if their health, safety and environmental arrangements are satisfactory.

Throughout the work, regular communication is had with all parties involved to ensure continued compliance with HSE requirements.

COMPANY AND PRIVATE VEHICLES

Only Company drivers and their spouses are authorised to drive a company car. Any other person wishing to drive a company car must get authorisation from the Senior Director who must be informed for insurance purposes. All drivers must hold an appropriate licence and insurance.

The driver of the company vehicle is responsible for ensuring its roadworthiness at all times, reporting any defects to the Administrator immediately (reference should be made to the Company Car Policy TAP/PL/0001 Version 1). Vehicles must be kept clean and the oil checked on a regular basis. Cars must be driven and parked in a careful manner.

All parking fines will be met by the driver. The Company will make no exception to this rule.

Private cars must be driven and parked in a safe and proper manner at all times. Regular breaks should be taken on longer journeys.

The use of mobile telephones whilst driving should be kept to an absolute minimum. If it is necessary to use your mobile telephone, this should only be done when it is safe to do so and using a hands-free kit.

WORKING ON CLIENT'S SITES

A diary is maintained of employees undertaking work on Client's sites so that the location of employees is known at all times.

During site work, employees of Altus Andrews are provided with appropriate Personal Protective Equipment and a Company mobile telephone.

When working on Client's sites, Clients health and safety rules are followed at all times.

LONE WORKING

Within Altus Andrews, lone working is minimised. Where lone working is necessary, a risk assessment is undertaken of the activity and appropriate actions taken to reduce the risk to as low as reasonably practicable. Regular contact is always maintained with any employee undertaking lone working.