

GENERAL OCCUPATIONAL HEALTH & SAFETY POLICY

The Company regards the promotion of Health & Safety as a mutual objective for management and employees at all levels. It is therefore Company policy to do all that is reasonably practicable to provided and maintain safe and healthy working conditions. To prevent personal injury and to protect everyone from foreseeable and known hazards, including the public in-so-far as they come into contact with the Company or its products.

The OH&S policy is the driver for implementing and improving the organisation's OH&S management system, so that it can maintain and improve its OH&S performance. The policy reflects the commitment of top management to improvement and will be monitored to ensure that it;

- a) is appropriate to the nature and scale of the organisation's OH&S risks;
- b) includes a commitment to prevent injury and ill health and for continual improvement in OH&S management and performance;
- c) includes a commitment to at least comply with applicable legal requirements, and with other requirements to which the organisation subscribes that relate to its OH&S hazards;
- d) provides a framework for setting and reviewing OH&S objectives;
- e) is documented, implemented and maintained;
- f) is communicated to all persons working under the control of the organisation with the intent that they are made aware of their individual OH&S obligations;
- g) is available to interested parties; and
- h) is reviewed periodically to ensure that it remains relevant and appropriate to the organisation.

Responsibilities

Overall and final responsibility for health and safety is that of the Stairways Directors. However, the Group HR Manager is the Health & Safety Appointed Person. It will be the primary role of the Group HR Manager to ensure that the Company complies with applicable legal requirements. All employees are required to:

- Co-operate with their supervisor/manager on health and safety matters;
- Not interfere with anything provided to safeguard their health and safety;
- Follow any system of work implemented to protect their health and safety and generally take reasonable care of their own health and safety; and
- Report all health and safety concerns to an appropriate person (as detailed in this policy statement).

Risk assessment

The Group HR Manager has been nominated as the person who will oversee the carrying out of risk assessments in our workplace. We will adopt a pro-active approach by conducting a systematic and up-to- date risk assessment of all areas of our organisation. These risk assessments will establish what needs to happen in your area. This assessment will cover all foreseeable hazards. This is a practical exercise that will lead to the implementation of necessary improvements in the design of our workplace and the way in which we organise work.

Consultation

As part of our risk management process we are committed to consulting and involving all employees. Your involvement in this process is seen as essential. An important part of our policy is the commitment to provide you with appropriate health and safety training so that they can fulfil competently your health & safety responsibilities, including participating in the risk assessment process. It is the joint responsibility of the Company and its employees to maintain a review body (The Joint Health & Safety Committee) to assist in the investigation of accidents and dangerous occurrences, with the object of introducing measures to prevent a recurrence and also to improve workplace safety and awareness

Monitoring and Inspection

Constant scrutiny contributes to the development of a healthy and safe workplace. We will undertake regular inspections and checks to monitor health and safety performance. Your involvement and participation in this ongoing exercise is seen as very important.

Training and Information

The Group HR Manager has been nominated as the person who will oversee the delivery of health and safety training in our workplace. A key element to achieving safe work practices is knowledge and information. All staff, including temporary workers, will receive health and safety training. This training will include induction training for new staff, as well as on-going health and safety training for staff on more specific issues associated with their work. Health and safety training will cover all the foreseeable hazards to which employees are exposed and safety measures you must take to protect your health and safety.

If you are required to undertake a task for which you feel you are not competent and where your health or safety might be put at undue risk you are required to report this immediately so that appropriate remedial steps can be taken.

Accident Reporting

The reporting of accidents and dangerous occurrences is a statutory requirement. Certain accidents and ill health that result in a person being absent for three or more days must also be reported to enforcing authorities. In addition to obvious injury, this reporting covers absence due to ill health from recognised diseases.

All staff are required to report any work related ill health absence or dangerous occurrence. In the event of an accident there will be a formal investigation. This is not to apportion blame but to establish root causes so that we can prevent future accidents.

Signed:

**Neil Stevens**

Joint Managing Director
For and on behalf of Stairways (Midlands) Limited