

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 1 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## TABLE OF CONTENTS

### **SAFETY MANAGEMENT SYSTEM DESCRIPTION**

Company Overview	2
EHS Value and Policy Statement	2
EHS Principles	3
Roles and Responsibilities	5
Document Management	8

### **SAFETY MANAGEMENT SYSTEM POLICIES**

1.0 Job Safety Analysis and Control	10
2.0 Risk Assessment	10
3.0 Safe Operating Procedures	12
4.0 Incident Investigation and Analysis	12
5.0 Planned Inspections	13
6.0 Communication	14
7.0 Industrial Hygiene and Health Monitoring	15
8.0 Sub Contractor Safety	16
9.0 Emergency Response or Contingency Planning	16
10.0 Personal Protective Equipment	18
11.0 Training and Development	19
12.0 Procurement	20
13.0 Engineering and Design Modification	21
14.0 Audits	22
15.0 Environment Health and Safety Committees	24
16.0 Substance Abuse Program	24
17.0 Fire Safety Program	25
18.0 Safety Rules	26
Glossary of Terms	27
Numbered Copy Distribution	28

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 2 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## COMPANY OVERVIEW

Alstons Building Enterprises Limited (ABEL) is the largest manufacturer of clay and metal building products in the English speaking Caribbean. For over sixty years, ABEL has been at the forefront of the building materials industry in terms of quality, variety, and innovation.

In 2001, ABEL launched the Astralite range of vinyl (uPVC) windows and doors to add to its already extensive range of products. ABEL is also involved in the supply and installation of glass curtain walls and aluminum cladding for multi-story complexes, the largest being the twenty story Nicholas Tower that was completed in 2004

ABEL is an ISO 9002 certified company since 2001, and a member of the ANSA Mc Al Group of Companies.

## EHS VALUE and POLICY STATEMENT

### ***EHS Value:***

We value life and together we commit to ensuring its preservation.

### ***EHS Policy Statement:***

Our operations will be run in a safety oriented, environmental conscious, socially responsible, and people sensitive manner.

Together we will achieve this through the implementation of an EHS Management System and will continuously strive to exceed the requirements of local legislation.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 3 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## **EHS PRINCIPLES**

### ***We are all accountable for conforming to the EHS Policy***

Each employee, including sub-contractor employees, is responsible for working in a manner that respects the health and safety of the individual and the environment. Such behaviour is a requirement of the workplace. All management personnel, beginning with the Managing Director, are specifically accountable for assuring compliance with the EHS Policy.

### **We will work diligently to prevent all accidents**

We believe that all incidents, including illnesses, injuries, spills and excursions, whether immediate, latent or cumulative, can be prevented.

Line management is responsible for providing a workplace that is designed to be free of incidents, and all employees must contribute to this goal. We will sponsor environmental health and safety training to equip employees with the skills necessary to prevent incidents.

### **We will work practice sound environmental health and safety management**

We will integrate environmental health and safety management fully with business and operating management to ensure that long-term and short-term environmental health and safety issues are considered, together with market and economic aspects, when decisions are made regarding new and existing processes, products and services. We are committed to continual improvement in all aspects of our environment health and safety performance.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 4 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

**We will comply with all applicable laws, regulations and permits, and will develop and employ more restrictive internal standards where necessary to conform to ABEL/BESTCRETE EHS Policy**

We will be proactive when dealing with environmental health and safety issues, work with government officials and others to develop reasonable laws, regulations, standards and protocols and take appropriate actions that may precede laws or regulations.

**We will report on our activities**

We will communicate promptly and openly with individuals and communities regarding the environmental health and safety aspects and impacts of our operations, as well as with concerned parties who request such information. We will also provide an Annual Environmental Health and Safety Report that describes our programs, plans and performance.

**We will support sustainable development, the responsible use of natural resources and energy conservation**

We will incorporate sustainable development into our operations by integrating environmental health and safety considerations into all relevant business decisions. We will utilize the best available information to plan and execute all projects that involve extraction of our raw materials, or which may restrict the use of natural resources or impact eco-systems, will strive to maximize efficient energy use, conserving non-renewable resources.

**We will supply safe and reliable products and services**

We will take all reasonable precautions to assure that the products and services that we supply to customers are consistent with the EHS Policy. Customers will be provided with complete and accurate product and service information.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 5 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## **ROLES AND RESPONSIBILITIES**

Management, all employees and sub-contractor personnel are responsible for the environment, health and safety in all operations. Although the roles and responsibilities can be well defined for various categories of personnel, one person can fit the definition of several categories of personnel depending on the function that person performs at any time.

### **Roles and Responsibilities of Managing Director:**

- Managing Director’s primary role in the Environmental, Health and Safety Management System is to consistently demonstrate commitment to the EHS philosophy and provide the resources and support to enable the translation of that philosophy into tangible actions.

### **Roles and Responsibilities of Site Manager:**

- To work with employees to establish the annual environmental, health and safety objectives for the Business Plan.
- Will monitor the results of audits and the action plans arising from them, to ensure problem areas are identified and remedied.
- To participate in Joint Health and Safety Committee Meetings.
- To be involved in accident / incident investigations.
- Support the EHS Coordinator in the implementation of EHS Management System.
- To monitor Sub-Contractors EHS program.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 6 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

**Roles and Responsibility of the Environmental Health and Safety Coordinator:**

- To manage, administrate and co-ordinate the occupational health, safety, first aid and environmental activities.
- To identify training needs and conduct training sessions for the company in accordance with the approved training program.
- To assist in the sourcing of facilitators to conduct training as required.
- To maintain safety records and statistical data and perform analysis for continuous improvement.
- To review the EHS documentation and institute changes based on current industrial and international standards.
- To inform management on matters pertaining to EHS.

**Roles and Responsibilities of Supervisor:**

Supervisor's roles and responsibilities for safety management are primarily:

- Applying Safety Management System policies and principles in the every day's work.
- Participating in the preparation of the environmental, health and safety objectives for the annual business plan.
- Is charged with the responsibility of ensuring that all work is carried out by competent and trained workers in a manner consistent with the company-approved policies, procedures and standards.
- Be part of the Joint Health and Safety committee

**NB:** An employee fills in for his immediate supervisor on a temporary basis will assume the role and responsibilities of a supervisor for that period.

<b>ABEL/BESTCRETE</b>		
<b>ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 7 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

**Roles and Responsibilities of Employees:**

- Employees are encouraged to actively participate in the EHS related activities to provide insight regarding work methods, practices and other improvement opportunities, so that the environment health and safety management system can be continued to be improved.
- Employees are asked to carry out their work in compliance with laws, rules and regulations, in observance of company policies, producers and instructions and take reasonable action to eliminate or control hazards in their work environment.

**Roles and Responsibilities of Sub-Contractors:**

- Sub-contractors' role is to carry out their work in compliance with the law, rules and regulations, in observance of company policies, procedures and instructions, and take any reasonable action to eliminate or control hazards in their work environment.
- Sub-contractors are responsible to themselves, to their families, to their fellow workers, and to their employer for performing their tasks in a safe manner.

<b>ABEL/BESTCRETE</b>		
<b>ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 8 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## DOCUMENT MANAGEMENT

The effective safe and proper conduct of our business necessitates that a vast amount of information is available to all our employees and customers. Much of the required information is made available in the form of documents of various types.

Documentation plays a central role in identifying the work to be done, in defining objectives and setting standards, and by monitoring and measuring performance against those objectives and standards.

As safety ties into all aspects of our jobs, much of the documentation required for normal business is also forming part of the environment, health and safety documentation, and as such constituting an integral part of the Environment Health and Safety Management System.

Examples of these documents are:

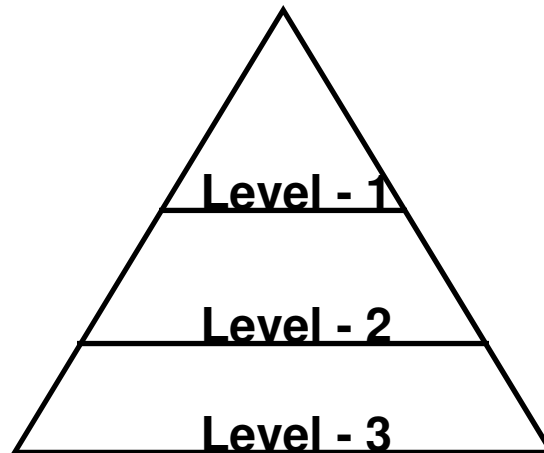
- |                         |                        |
|-------------------------|------------------------|
| - Technical manuals.    | - Letters or memos     |
| - Operating procedures. | - Records.             |
| - Specifications.       | - Reports.             |
| - Standards             | - Safe work procedures |
| - Guidelines.           | - Drawings.            |

To be effective, these documents need to be arranged in a systematic manner.



<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 9 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

**ABEL/BESTCRETE  
DOCUMENT HIERARCHY**



**Level 1**

The Level 1 document in the context of environment, health and safety documents, is the Environment Health and Safety Management System, Policy Manual (this document), containing the management policies, which further establishes the goals, objectives and responsibilities for managing health, safety and environmental protection throughout the organization.

**Level 2**

Level 2 of the EHS document hierarchy consists of department specific documents or manuals and general procedure manuals. These manuals will contain specific procedures that are the implementation tools to help make the EHS Management System work effectively.

**Level 3**

Level 3 of the EHS document hierarchy consists of supporting documents such as technical descriptions, vendor manuals, drawings, certificates, contracts, reports, forms, etc.

Supporting documents are of sufficient detail to support the specific manuals found in Level 2.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 10 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## **1.0 SAFETY ANALYSIS AND CONTROL – JSA**

Job Safety Analysis (JSA) is the systematic examination of a task to identify potential hazards while the task is being done. JSA is done through observations and discussions on site.

An observation of substandard performance identifies problems with training, supervision, motivation, design, tools and equipment, procedures, practices, materials or maintenance. As a result, specific actions can be taken to reduce or control the risks of the observed deficiencies

### **The Critical Steps of the JSA process:**

- Select the job to be analyzed
- Break the job done into its component parts in a orderly and chronological sequence of the job steps.
- Develop control measures to eliminate or reduce the risk of accident / incident.
- Formulate written and safe system of work and job safety instructions.
- Review safe system of work and job practices at regular intervals to ensure their utilization.

## **2.0 RISK ASSESSMENT**

At ABEL/BESTCRETE Risk Assessment is done to enable control measures to be devised. It is important to have an idea of the relative importance of risk and to know as much about them as we can in order to take appropriate decisions on controls. ABEL/BESTCRETE assessment of risk is nothing more than a careful examination of what, in work, could cause harm to people so that management can weigh up whether they have taken enough precautions or should do more.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 11 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

**Severity x Probability = Risk**

There are two types of risk assessment:

**Qualitative** - it is subjective, based upon personal judgment backed by generalized data on risk.

**Quantitative** - an objective probability estimate based on known risk information applied to the circumstances being considered.

ABEL/BESTCRETE risk assessment contains:

- Hazard details
- Applicable standards
- Evaluation of quantitative or qualitative risk
- Preventative measures
- Review dates or feedback

The safety precedence sequence shows ABEL/BESTCRETE order of the implementation of control measures:

- *Hazard elimination* - for example the use of alternatives, design improvements, changes of process.
- *Substitution* - for example replacement, of a chemical with one with less risk.
- *Use of barriers* - isolation, removes hazard from the worker, puts hazard in a box
- *Segregation* - removes worker from the hazard puts worker in a box
- *Use of procedures* - limiting exposure time, dilution of exposure.
- *Safe systems of work.*
- *Use of warning systems* - signs, instructions and label.
- *Use of personal protective equipment* - use only when all other options have been exhausted - PPE is the last resort.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 12 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

### **3.0 SAFE OPERATING PROCEDURES**

ABEL/BESTCRETE safe operating procedures for the block plant operations are consistent with Statutory and International requirements. ABEL/BESTCRETE will review these procedures on a timely basis to ensure that they are effective and relevant to our operations. These procedures are to be followed by all employees, visitors, and sub-contractors.

### **4.0 INCIDENT INVESTIGATION AND ANALYSIS**

Incident Investigation and Analysis involves the methodical examination of an event which did, or could have:

- Resulted in harm to people, or
- Damage to property, equipment or the environment with the emphasis on preventing similar occurrence.

Accidents and incidents (“near misses”) are signs of a likely deficiency in the EHS management system, because accidents and incidents don’t simply happen, they are caused. :

- The real, or root, cause(s) showing why the incident occurred can be determined and efficiently controlled or eliminated.
- Morale will improve when the process is perceived to be fair and consistent.
- The continuous improvement initiative will be enhanced when employees willingly report incident or accident situations or conditions without fear of reprisal.
- Possible legal liabilities can be determined on the most accurate basis.
- **NB:** A detailed procedure for Incident Investigation and Analysis would be implemented

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 13 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## **5.0 PLANNED INSPECTIONS**

The objective of conducting planned inspections is to detect and rectify hazardous and unsafe conditions and actions before they have a chance to develop into incidents or accidents.

Planned inspections involve the systematic examination and assessment of the company's facilities, equipment, tools, materials, and how the employees use of them. Inspections provide feedback to management of the efficiency of the EHS system, improve employee morale and work efficiency, and demonstrate management's commitment through visible involvement.

While critical equipment/parts/items inspections are dealt with through the preventive maintenance and quality system, general environment and safety inspections will address areas such as:

- Cleanliness and orderliness.
- Areas that are poorly arranged or laid out.
- Unsafe packing, surplus materials, blocked or obstructed escape routes and walkways, emergency equipment, and exits.
- Improper storage or identification of dangerous substances.
- Condition of safety and survival equipment.
- Condition of personal protective equipment.
- Condition of work equipment.

The frequency of planned inspections will be established and communicated. Any hazardous condition, discovered during the inspection, will be reported in writing and classified according to its potential risk. High-risk deficiencies discovered during an inspection shall be corrected immediately and will be investigated to establish the underlying cause(s) of the problem. Remedial actions will be monitored and periodically reviewed with management.

<b>ABEL/BESTCRETE</b>		
<b>ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 14 of 28
<b>APPROVED BY:</b>	<b>AUTHORIZED BY:</b>	

## 6.0 COMMUNICATIONS

Efficient communication between management and employees is of critical importance to achieve our goals and objectives in the area of environment, health and safety.

By providing critical environment, health and safety performance related information on a frequency basis, knowledge, skills and awareness would improve.

It is a pre-requisite for successful EHS management that a two way open communication exists between management and the employees on all matters related to health and safety.

We will seek to achieve the desired level of communication through:

- Orientation (communication of safety and environment information) of new employees and new sub-contractor personnel.
- Giving specific job (task) instructions to all new personnel who may be unfamiliar with the job or location.
- Holding pre-job safety meetings.
- Holding general health and safety meetings.
- General environment, health and safety promotion.
- Refresher training.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 15 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## **7.0 INDUSTRIAL HYGIENE AND HEALTH MONITORING**

This out-lines the key principles and activities that will be implemented to ensure that all personnel working in the locations we operate do not become adversely affected from exposure to any potential health hazard, *i.e.* chemical, physical, biological and ergonomically. These potential hazards take the form of products, either produced, purchased, or otherwise encountered on work sites.

It is of utmost importance that all personnel are vigilant towards potential health hazards and get involved in controlling or eliminating them. Industrial hygiene is the science of protecting workers health through the control of hazards in the work environment, those that may pose an immediate threat to health as well as those posing a risk of potential occupational illnesses.

To prevention of health related injuries and illnesses, we will employ a process of identifying potential health hazards by:

- Reviewing or checking all work environments to identify and evaluate health hazards.
- Evaluating the extent or seriousness of the problem to determine:
- If current control mechanisms are sufficient to prevent health related injuries and illnesses and are in compliance with company standards and regulatory requirements, or if additional or different controls are required.

Controlling Potential Health Hazards by:

- Clearly pointing out and marking of potential health hazards.
- Arranging for emergency treatment at appropriate locations.
- Educating people on the specific health hazards of their function.
- Applying work methods, procedures, rules and practices that ensures the protection of personnel in a work environment with potential health hazards.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 16 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

Efficient monitoring will provide information relevant to the quality of the industrial hygiene program, and it will tell us where we have to improve to accomplish our goals in this area of our operations.

## **8.0 SUB-CONTRACTOR SAFETY**

Sub-Contractor safety in this context, are those activities we outsource to ensure that contract work is done safely and efficiently. Satisfactory sub-contractor safety will be accomplished by encouraging our contractors to invest and fully participate in the health and safety of their employees by developing, maintaining, and implementing their own safety programs. A sub-contractor's safety program will be considered an important factor in determining award of sub-contracts.

Efficient communication and understanding of responsibilities and standards are pre-requisites of good quality sub-contractor safety.

## **9.0 EMERGENCY RESPONSE OR CONTINGENCY PLANNING**

Whatever precautions are being taken through safe design and prudent operation, maintenance and human behavior, accidents may occur, affecting people, installations and environment.

Emergency response and contingency planning provides the means for efficient handling of any abnormal or emergency situation.

The objective of emergency response/contingency planning is to secure worker and public safety, minimize consequential loss and costs, reduce company liability, and ensure compliance with rules and regulations during an emergency situation or condition.



<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 17 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

An up to date Emergency Response Plan for all of ABEL/BESTCRETE operations shall be in place, and the efficiency of the plan will periodically be tested through drills and exercising the handling of simulated emergencies.

Aid agreements with outside agents, organizations, and/or companies, will be involved in those exercises as seen appropriate in each case.

Any deficiencies revealed during those exercises shall be rectified promptly, resulting in a continuous improvement of the Emergency Response Plan.

Some types of emergencies that will be considered and addressed in the site specific emergency response plans are:

- |                             |                      |
|-----------------------------|----------------------|
| - Chemical                  | - Gas release.       |
| - Fire and/or explosion.    | - Natural Disasters  |
| - Radiological Incident.    | - Acts of terrorism. |
| - Sabotage.                 | - Political unrest.  |
| - Transportation incident   | - Flooding           |
| - Product spill/Containment |                      |

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 18 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## **10.0 PERSONAL PROTECTIVE EQUIPMENT**

Despite good design and proper operation and maintenance of installations and equipment, personnel may still be exposed to actual or potential hazards such as chemicals, vapors, noise, heat, smoke and dust.

Personal Protective Equipment (PPE) is a last line of defense, to be used when other protective measures are unable to eliminate or control the hazard, but in those situations, it provides the final barrier between the human body and a harmful environment.

Therefore, it is critically important that the right type of equipment is selected, that it exists and is available in sufficiently quantity, that the user knows how it should be used and maintained, and that the person subject to risk is actually using it.

Personal Protective Equipment includes:

- |                            |                                       |
|----------------------------|---------------------------------------|
| - Eye and face protection. | - Respiratory protection.             |
| - Protective footwear.     | - Protective/fire resistant clothing. |
| - Fall Protection          | - Fall Arrest                         |
| - Protective headwear      | - Hearing protection.                 |

To encourage and promote optimum use of personal protective equipment ABEL/BESTCRETE will:

- Establish the requirement for PPE by industry practice, hazard assessments, task analysis and government regulations.
- ABEL/BESTCRETE will introduce a Personal Protective Equipment procedure.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 19 of 28
<b>APPROVED BY:</b>	<b>AUTHORIZED BY:</b>	

## **11.0 TRAINING AND DEVELOPMENT**

Competent, safe and environment conscious personnel are pre-requisites for efficient and safe job performance. ABEL/BESTCRETE prime goal is to have “the right person at the right place, performing the right task” in any given situation. This goal will be achieved through proper selection of personnel and implementation of appropriate training and development programs.

There are three types of training programs going hand in hand:

- Job training (professional training).
- Safety training.
- Emergency response training

*Job training* aims at developing, maintaining, and improving the skills and knowledge necessary to do the job right, safely and efficiently.

*Safety training* aims at improving the knowledge of what causes incidents or accidents and how to prevent them.

*Emergency response training* aims at developing the skills and knowledge necessary to control and reduce the consequences of incidents or accidents.

The required job training for each individual will be determined by the needs of the occupation and location, and will be contained in an annual training program for employees at all levels

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 20 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## 12.0 PROCUREMENT

Through purchasing or renting of sub-standard materials and equipment, potential hazards are incurred. It is imperative that all procured or rented materials, equipment and services fully conform to the specification requirements and arrives in good condition for introduction to the intended service.

An efficient procurement process, including consideration of the EHS aspects, will be achieved through:

- Obtaining hazardous products only through a duly specified material requisition from approved vendors.
- Specifying and verifying compliance with applicable ABEL/BESTCRETE standards or specifications, industry codes and government regulations as appropriate.
- Accepting only chemicals with an approved “Materials Safety Data Sheet (MSDS) or Safe Handling of Chemicals” (SHOC) listing.
- Assessing EHS implications of all purchased and rented products for critical application.
- Checking for compliance with specification of all purchased and rented items at reception.
- Handling, storing, and disposing of hazardous products according to vendors written instructions. Personnel involved will be trained as appropriate.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 21 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

### **13.0 ENGINEERING DESIGN AND MODIFICATION**

To avoid introducing hazards into the operations resulting from faulty design and engineering of new installations and modifications of existing facilities, adjusting operating parameters or changing production methods, a system shall be put in place to ensure compliance with rules and regulations, industry standards, design codes, and Engineering Specifications.

The prime objective is to optimize design so as to build in the required safety, operability and reliability.

When designing new installations and modifications of existing facilities, we will:

- Ensure compliance with applicable industry codes and standards, government regulations and ABEL/BESTCRETE Engineering Specification.
- Establish or review safety objectives and risk acceptance criteria.
- Conduct a formal Process Safety Management System Review (in accordance with API RP 750) for all new installations and ensure compliance with the established Management of Change Procedure for all modifications of existing facilities.
- Systematically identify and evaluate hazards and assess the efficiency of measures to control their risks to an acceptable level according to established risk acceptance criteria.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 22 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## 14.0 AUDITS

Underlying causes of incidents and accidents are often organizational rather than technical, while technical deficiencies can be discovered by inspections. Audits are required to evaluate the efficiency of the EHS system.

ABEL/BESTCRETE will employ a structured program of auditing and monitoring to ensure that the management system is functioning to achieve the values, strategies and objectives of environment, health and safety matters. As sub-contractors form a portion of the ABEL/BESTCRETE work force, audits will be conducted to assess their safety performance similarly to the assessment of our safety performance.

The auditing program consists of three types of audits:

### **Pre-Contract Audits**

These audits will be carried out when and where necessary to ensure that a particular sub-contractor has an adequate environment, health and safety management system (EHS) in place.

### **Local Safety Audits**

These audits will be carried out by Site Manager, Supervisor, Personnel, EHS Coordinator, and member's of the joint safety committee, are required to follow this safety precedence on the implementation of control measures and will cover the direct operational and technical standards such as safety equipment/systems, compliance with operating and maintenance procedures, permit to work, house-keeping, training and certification. Local safety audits of all operating locations shall be conducted at least twice a year.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 23 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

### **Senior Management Audits**

Members of senior management from various disciplines within ABEL/BESTCRETE will carry out these audits. The team will assess the overall safety, occupational health and environmental climate, and ensure that the objectives and priorities are being communicated, understood, accepted, and followed by all personnel. Senior management audits shall be conducted at least annually.

The process to be followed for these audits is:

- The audit team will discuss their findings with the management of the facility or function audited.
- The formal report will be issued to the section head with the responsibility for the function audited, and copied to the Managing Director to whom the department head reports.
- The department head with direct responsibility for the audited function will be responsible for providing the formal response to the audit recommendations and for ensuring timely compliance with the recommendations accepted for implementation.

In addition to those audits, “independent” compliance audits will be carried out periodically:

### **Compliance Audits**

A Process Safety Management audit will be carried out at least every two (2) years. This audit will be conducted by a team comprised of multi-discipline personnel from other ABEL/BESTCRETE operating locations and/or head office.

Findings and recommendations shall be reported to the Managing Director. Management shall promptly respond to each finding in the audit report and document that identified deficiencies have been corrected.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual		<b>NUMBER:</b> EHS-001-2006
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 24 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## **15.0 ENVIRONMENT HEALTH AND SAFETY COMMITTEES**

ABEL/BESTCRETE Environment Health and Safety Committee was developed with the intent to give employees an opportunity to take part in the operation of the EHS program. The membership of the Committee shall be settled through normal procedure and would be the result of consultation of the Management Team and Supervisors.

The committee shall comprise of:

- One member of the senior management team.
- One supervisor from each department or craft.
- Employee's representative.
- EHS Coordinator

Membership would be rotated every (6) months to ensure everyone would be given an opportunity to serve on the EHS committee.

ABEL/BESTCRETE members of the Safety Committee should suffer no loss of salary from attending safety meetings. Meetings should be held as necessary and agreed minutes of the meetings should be sent to the management team and copies displayed to employees.

## **16.0 SUBSTANCE ABUSE PROGRAM**

ABEL/BESTCRETE recognizes the danger posed to the company personnel and equipment because of the use of illegal or controlled drugs.

Under no circumstances should employees or sub contractors bring illegal drugs onto company or client's property. Any substance brought onto a work site that likely to impair the efficiency of the user should be accompanied by a prescription signed by a medical practitioner.



<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 25 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

All employees and sub-contractor utilizing prescription drugs during the execution of duties should notify the EHS representative or a supervisor. ABEL/BESTCRETE reserves the right to conduct drug testing of employees as a means of enforcing this program.

Drug testing will be conducted on all new employees operating in hazardous areas.

## **17.0 FIRE SAFETY PROGRAM**

Fire is the only hazard that can destroy a thriving industry in the matter of minutes. ABEL/BESTCRETE is committed to protecting the environment (both natural and man made) and employees from the devastation of fires.

ABEL/BESTCRETE has developed a written procedure that seeks to eliminate and/or control the consequences of loss due to fires by:

- The provision of adequate and relevant fire fighting equipment.
- Training employees in the proper use of fire fighting equipment.
- Training employees to identify and eliminate and/or control fire hazards.
- Proper maintenance and/or replacement of fire fighting equipment.
- Making evacuation procedures known and understood by all employees.
- Regular and continuous inspection of the area of work to identify and eliminate and/or control fire hazards.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 26 of 28
<b>APPROVED BY:</b>	<b>AUTHORIZED BY:</b>	

## **18.0 SAFETY RULES**

Because of the diversity of land operations, ABEL/BESTCRETE has found it necessary to develop safety rules that are consistent to Company, State and International Organization:

- To ensure that the environment is preserved
- To ensure the health and safety of all our employees and all those who may be affected by our activities.
- To eliminate or control the damage to Plant and Machinery.

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 27 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

## GLOSSARY OF TERMS

To ensure efficient communication of the EHS Management System, the following glossary of terms has been used throughout this document and will be used in any other safety related document.

PSM	-	Process Safety Management
SMS	-	Safety Management System
EHS	-	Environmental Health and Safety
PPE	-	Personal Protective Equipment
EI	-	Employee Involvement
JSA	-	Job Safety Analysis
MSDS	-	Material Safety Data Sheet
SHOC	-	Safe Handling of Chemicals
LETG	-	Local Emergency Task Group
API	-	American Petroleum Institute
RP	-	Recommended Practice

<b>ABEL/BESTCRETE ENVIRONMENTAL HEALTH SAFETY MANUAL</b>		
<b>PROCEDURE TITLE:</b> Policy Manual	<b>NUMBER:</b> EHS-001-2006	
<b>REVISION DATE:</b> 02-16-2006	<b>REVISION:</b> 0	Page 28 of 28
<b>APPROVED BY:</b>		<b>AUTHORIZED BY:</b>

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