



Central Oceans

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1.0 HEALTH, SAFETY & ENVIRONMENT

1.1 INTRODUCTION

Central Oceans' activities are accountable to the management arrangements and legal requirements that apply in the countries in which they are based, as well as to the clients for whom the services are provided.

The Health Safety & Environment Management System is designed to provide a flexible yet robust means of managing Health Safety & Environment along the supply chain and at the clients' sites. This document sets out the main features of the system.

The preparation and execution of Project work is, typically, managed by staff at various locations or mobile between them with substantial reliance on networking. It is essential therefore that all concerned adhere to a common approach.

1.2 OBJECTIVES

Our objectives as a company can be summed up in the following statements;

- We provide ocean freight, contract logistics and value-added services to meet our customer's requirements.
- We combine dedication with expert knowledge about the industries we serve.
- We believe in building strong relationships with customers and suppliers.
- We are sensitive to the needs of our people and value the contribution of all our employees and partners.
- We conduct our business to the highest ethical standards.
- We aim to provide services that are technically and operationally the best available and to do so safely and without harm to the environment.

1.3 HEALTH, SAFETY & ENVIRONMENT STATEMENT

Central Oceans is committed to the health and safety of people and the protection of assets. We also ensure that the company's safety management complies with the relevant international, country specific regulations and the relevant standards and guidelines.

Our guiding principal that, so far as it is reasonably practicable, the company shall conduct all its activities in such a way as to:

- Avoid harm to all employees and assets that may be affected by its business
- Seek progressive improvement of its health and safety performance
- Comply with all applicable legislative requirements

Statement of objectives

- No job is too important that it cannot be done safely
- Achieve zero lost time accidents
- Minimise the number of non-lost time accidents and incidents
- Provide a healthy and safe place of work for all employees

Implementation of objectives

To achieve these objectives we seek to:

- Adopt safe working practices in our business
- Develop a high level of health and safety awareness amongst all employees
- Firmly establish health and safety issues as a management's prime responsibility



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- Provide competent personnel who are suitably qualified, trained and equipped
- Encourage the involvement of all employees to fulfill their obligations under this policy, to care for both their own safety and the safety of others
- Ensure that employees comply fully with the safe systems of work, in place at any worksite
- Conduct structured investigations of significant accidents and incidents in order to establish the root causes and implement preventative actions
- Ensure that equipment provided by the company or on its behalf, is fit for its intended purpose

1.4 ENVIRONMENTAL STATEMENT

Central Oceans is committed to improving and reducing its use of natural resources and to preventing pollution. It shall be ensured that the company's management system complies with national and international regulations, the relevant standards and guidelines and also current health, safety and environmental legislation.

It is our guiding principle that, so far as is reasonably practicable, the company shall conduct its activities in such a way as to:

- Avoid harm to the environment where impacted by its business
- Seek progressive improvement of its environmental performance
- Comply with all applicable legislative requirements

Statement of objectives

- Achieve zero environmental pollution events
- Minimise environmental incidents
- Minimise the environmental impact of activities by efficient use of resource and waste reduction

Implementation of objectives

To achieve these objectives **we** seek to:

- Adopt environmentally safe working practises in our business
- Develop a high level of environmental awareness amongst our employees
- Firmly establish environmental issues as a line Managers prime responsibility
- Provide competent personnel who are suitably qualified, trained and equipped
- Encourage the involvement and co-operation of all employees to fulfil their obligations under this policy to care for the environment
- Ensure that employees comply fully with the safe systems of work in place at any worksite
- Conduct all work using controlled procedures produced in accordance with; suitable and sufficient (environmental) risk assessment of all tasks
- Conduct structured investigations of significant environmental incidents in order to establish the root causes and implement preventative actions
- Take into account client requirements and ensure sub-contractors are able to meet those requirements



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2.0 HEALTH, SAFETY & ENVIRONMENT MANUAL

2.1 HAZARD MANAGEMENT & RISK ASSESSMENT

Identify the hazards and risks to ensure that adequate control measures are implemented to protect personnel, sub-contractors, customers and the general public.

2.2 SAFE SYSTEMS OF WORK

Managers shall ensure that all operatives and contractors are aware of and comply with safe systems of work, method statements, site rules, current legislation and the company's health and safety policy during all undertakings.

2.3 RISK ASSESSMENT AND METHOD STATEMENTS

The project team will review the activities of the company, identify hazards arising from routine and non-routine activities, affecting personnel and other parties. Risks will be assessed in the light of legal and other obligations and suitable control measures identified

To facilitate this work the Safety Department will also compile and update Registers of legal requirements and standards, and hold copies of relevant documents for reference. Risk assessments for all activities must identify where more specialized assessment is required;

Risks are to be managed by eliminating or reducing the activity, substituting a safer process or equipment, isolating the hazard from the work force, the use of engineering controls. These measures aim to protect the work force as a whole. Requirements should be identified during the risk assessment process,

2.4 IMPLEMENTATIONS AND OPERATIONS

1. The procedures and policies that have been developed are to be implemented on projects and sites. This is the responsibility of the project manager or of the sub-contractor to whom the work is contracted. So far as is reasonably practicable the standards that are required of us should also be required of sub-contractors and our partners on projects.

2. A procedure has been developed for integrating health, safety & environment into the preparation of bids and the planning of projects.

3. Central Oceans staff are employed by different national entities within the group. Legal obligations for health, safety & environment fall within the nation concerned.

2.5 RESOURCE MANAGEMENT

Central Oceans take responsibility for ensuring that staff are fully trained, qualified and experienced to undertake the required work and that we have provided them with the correct information, a suitable working environment and the correct equipment that is fit for purpose.

Employees shall be made aware of relevant procedures and legislation that are applicable to them. Certain essential instructions associated with the safety management system have been defined with new employees being provided with suitable induction training. In addition new employees, employees undergoing training and training course delegates and students shall be supervised, where required.

The competence of contractors shall be assessed on a regular basis to ensure suitability. Central Oceans will provide adequate competent personnel to meet the contractual requirements.



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2.6 WORKING ENVIRONMENT

Access to work areas shall be limited to authorized personnel and controlled where required. Central Oceans shall ensure, that the working area and environment is adequate to ensure that customer's requirements can be met without detriment to the quality of the work being undertaken or to the health, safety and welfare of employees, sub-contractors and visitors.

Where incompatible activities occur the work areas are adequately separated and a safe system of work enforced. Work Equipment will be safe by design, fit for purpose and well maintained. Adequate information training instruction and supervision will be provided. There will be regular inspection and the keeping of records. Additional precautions may be required for dangerous parts of machinery.

Good housekeeping practices reduce the likelihood of accidents and incidents from occurring; therefore employees are encouraged to apply good housekeeping practices whether working on our own premises or on a customer's premises.

2.7 CONTROL OF WORK EQUIPMENT

1. Central Oceans shall only use equipment under its control whether owned, hire/lease or loan that is suitable for the related activities undertaken. Equipment shall be uniquely identifiable.

2. New equipment shall be selected, purchased and checked for compliance with the relevant specifications, commissioned and calibrated before use. New equipment shall be selected taking into account health and safety aspects, as well as environmental conditions.

3. Work equipment includes fire extinguishers, fire blankets, fire alarm systems, fire detection systems and security systems, to ensure the health, safety and security of personnel

4. All equipment calibration, portable appliance testing and maintenance shall be undertaken in line with manufacturers specification.

5. Equipment shall be stored and used so as to minimize the risk of damage

6. Equipment shall only be operated by competent and authorised staff.

7. The records of all inspections and tests shall include details of the test and measuring equipment that was utilised.

8. Intermediate checks may be undertaken on equipment between calibration / maintenance periods, to ensure continued compliance with customers' requirements.

9. Wherever equipment goes out with the control of Central Oceans or where equipment is being moved then it checked as being in good condition and calibrated. The calibration and maintenance of all equipment shall be undertaken only by competent persons.



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2.8 EQUIPMENT MAINTANCE

1. Correctly functioning equipment is essential for the conduct of the company's business and to ensure that faulty equipment does not present a hazard.

2. The company operates a system of equipment maintenance to ensure the continued safety of all personnel and accuracy of results. The system employs three methods of inspection:

- Visual inspection by suitably trained personnel.
- Formal planned maintenance by a qualified engineer in line with manufacturer's recommendation.
- Formal inspection by a qualified engineer whenever a fault is detected or suspected.

3. All electrical equipment that is portable will be registered. The inspections will take place annually or on a frequency determined by risk assessment or when any defect is suspected.

4. Internal inspections of electrical equipment will only be performed by suitably experienced and competent personnel or sub-contractors.

2.9 COMMUNICATION

Central Oceans will maintain means to ensure that all relevant information is communicated to and from our employees, vendors, sub-contractors and customers. Employees have access to the managers who are responsible for communicating information and concerns about Health & Safety and Environmental issues. Health, Safety & Environment issues will be a standard agenda item for project meetings with client or sub-contractor.

Any lesson learned or important items of information related to health, safety or the environment shall be communicated to staff by email/post at the earliest possible time, this shall include the communication to staff working remotely. No-one may communicate information about Central Oceans to the media or any community organisations without the express authority of the relevant Senior Manager.

Note: This statement does not exclude access to the Health and Safety Executive or other country specific health and safety legislative bodies.

2.10 PURCHASING & SUB-CONTRACTORS

Central Oceans will only purchase from companies or utilise sub-contractors who can meet our requirements efficiently, safely and without harming the environment. Purchases of equipment or services that directly affect the safety or environmental aspects of service that we provide are made from approved suppliers who take health, safety and the environment as seriously as us. Purchase documents are reviewed and approved to ensure that they fully and correctly specify the purchasing requirements prior to release and that any certification requirements are specified. Equipment and services to be procured shall not only be technically suitable but shall also be safe to use by us and our customers. Wherever possible we shall select equipment and services that are environmentally friendly.



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Where Central Oceans have the need to use sub-contractors we will expect the same standard of care that our clients expect of us. We will manage this activity through the following: Evaluation of capability will be proportionate to the services supplied. e.g. a supplier of equipment would need to have means of ensuring its quality and fitness for purpose, whereas safety critical activities such as lifting operations, transportation would need to meet a greater range of standards, trained personnel, maintenance systems, certified equipment etc..

Verification of suitable safety management compliance with relevant International standards establish interface arrangements between sub-contractors, customers and Central Oceans, where required provide induction training as appropriate monitor performance during operations review sub-contractor performance purchased materials and supplies. Items purchased include equipment for supply to customers, consumables and measuring and test equipment for use during the services that Central Oceans provides.

Purchasing is controlled through management procedures which cover: Evaluation of capability of vendors selection based on "Fitness for Purpose" including health, safety and environmental issues review of vendor's performance Specification and certification of materials and services so as to ensure "fitness for purpose", this shall include safety in use and minimum environmental impact where possible we will keep an approved list of sub-contractors and suppliers

2.11 EMERGENCY RESPONSE AND CONTINGENCY PLANNING

For all premises and projects a range of possible emergency situations exist for which contingency plans must be made; first aid/medical, fire, external threat, chemical incident, accident., rescue situations. Traffic incidents must also be considered.

Risk assessments are required to determine the nature of the potential emergency and the measures required to control it. Suitable equipment must be provided (eg for raising alarm, fighting a fire) escape routes maintained and staff trained.

Responsibilities will be assigned, for taking control of the emergency and giving support. An agreed procedure will be required to report the incident to client, authorities, company safety management, and carrying out investigations.

2.12 ACCIDENT/INCIDENT REPORTING AND INVESTIGATION

1. Legal requirements for reporting accidents dangerous occurrences and diseases vary from country to country, as do the requirements of clients. For most purposes the UK RIDDOR and the US OSHA requirements will suffice.

2. Each employee working for Central Oceans is to make a verbal report to their Management or Supervisor as soon as an unsafe event is observed or occurs.

3. Any accident that results in a fatality or injury to an individual that results in lost time or hospital treatment should be reported to the management, with a short account. Further information should be forwarded on request or at the conclusion of the investigation.

4. Additional reporting requirements to a client or to the regulatory body in the country concerned must be honored.

5. Immediately, following an accident the priorities are; protect the injured person and make the location safe; preserve the scene for the benefit of investigation; collect information from witnesses; photographs etc.



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6. On receipt of a report of an accident, incident or hazardous occurrence management shall evaluate the report and determine any further action needed to prevent an immediate repeat of the event.

7. These requirements for reporting and investigation apply also to sub-contractors and partners with whom we work. If an accident occurs while they are working with us, we must ensure that reporting and investigating is carried out

2.13 OCCUPATIONAL HEALTH

Central Oceans provides a working environment that will ensure that the health and welfare of our employees is of the highest priority. Where required we shall provide health surveillance (based on assessment of likely exposure to harmful substances or work activities). Working conditions that Central Oceans review with regards to occupational health include, but are not limited to:

- Noise Temperature
- COSHH and Chemical Hazards
- Use of X-Ray machinery
- Skin Diseases and dermatitis
- Stress and violence in the workplace
- Respiratory Conditions
- Seating, VDUs and potential RSI (Repetitive Strain Industry) injuries
- Eye Care Lifting and manual handling
- Medical Arrangements
- Health
- Surveillance
- First Aid Stress Management
- Substance Abuse
- Personal Protective and Safety Equipment
- Driving
- Vibration from tools and equipment
- Working at height
- Use of rigging, slinging and lifting equipment
- Handling of gas cylinders
- Exposure to environments with the likelihood of fire and explosion
- Exposure to extreme weather

The health & safety needs of young people in the workplace, will be assessed on an individual basis to take account of their experience and need for supervision and training. Central Oceans will provide eye and eyesight tests for employees when requested. Sub-contractors shall be responsible for the needs of their own staff, and ensuring that they provide personnel who are fit for work.

All new workers must attend a pre-employment medical screening to determine if they are physically and medically fit prior to starting work. The nature of the work undertaken will influence the medical arrangements and surveillance requirements. Any special requirements for projects (e.g dangerous goods handling) must be identified at the planning stage.

Sickness absences will be monitored to ensure early investigation of any patterns of illness associated with any worksites or occupations.



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Where required and defined by results of assessments the project team shall organize and implement environmental hygiene surveys to ensure the maintenance of good food handling practice and standards or facilities.

The possession, use, sale or purchase of drugs and alcohol at work is in breach of company policy and is not permissible and may constitute a criminal offence. If managers or company officers suspect drugs/alcohol are being used or concealed, a search of personal possessions may be carried out.

Personnel found in possession of drugs/alcohol or tested positive for drugs/alcohol may be removed from the facility and subject to the relevant disciplinary action (under employment law and company procedures)

2.14 ENVIRONMENTAL MANAGEMENT

Environmental Aspects of the work shall be assessed to ensure that adverse impacts on the environment are minimized. Where any pollution or waste is produced then it shall be subject to monitoring and control.

Central Oceans shall ensure that systems are in place to control, segregate and dispose of different types of waste that are produced as result of the Company's business activities on their own premises and on sites. Emergency planning will include response to pollution incidents, and staff will receive suitable information and training, wherever there is to waterways or the sea, or of harmful emissions to air.

All waste generated will be segregated into solid (controlled, hazardous and medical) or liquid forms and managed in a manner which minimizes Health Safety Environment impacts and meets appropriate standards. Responsible persons will be appointed to manage waste.

2.15 MISCELLANEAUS

Visitors; All visitors are required to comply with Central Oceans health and safety arrangements and follow any reasonable instruction with regard to health, safety and the environment. Visitors will sign in and out, and will be in the care of their host who must be an inducted person, and who will provide all necessary guidance and information. It is the responsibility of all who bring visitors or working personnel on site to ensure that they have the correct protective equipment for the tasks they are to be undertaking. The requirements will be determined by site rules and by risk assessment. Typical minimum requirement for a construction site:

- Hard hat
- Steel toe capped safety boots
- Safety glasses
- Overalls or suitable long sleeve shirt and trousers
- Hearing protection (must be worn in designated areas)



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2.16 THIRD PARTY LIAISON

Liaison with national and local statutory authorities and interested parties on health, safety and environmental matters will be encouraged and will be implemented by designated management. Liaison with the media on health, safety and environmental matters is the responsibility of the Managing Director. All contractors working within the sphere of the company's operations will comply with company health, safety and environmental regulations and with all statutory legislation applicable to the work being carried out. Liaison with contractors is the responsibility of the managers in charge of the work, who will ensure that contractors are fully aware of, and comply with, the company's requirements.