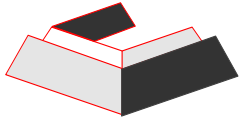


**Focus** ELECTRICAL AND CONTROL SYSTEM ENGINEERS  
ENGINEERING Ltd.

# **Safety Statement**

**for**

***Focus Engineering Ltd.  
1 Bridge Street,  
Kilkelly,  
Co. Mayo***



## Management Safety Declaration:

### ***To all employees, visitors and contractors***

The Safety, Health and Welfare at Work Act 2005 requires Focus Engineering Ltd. to prepare and issue a safety statement setting out its policy on safety. This statement together with the following documents will be known collectively as the 'safety statement': It deals with the following areas;

- Hazard identification, risk assessment and risk reduction guidelines.
- Allocation of responsibilities.
- Consultation procedure.

This document has been prepared by Focus Engineering Ltd. to comply with its obligations under the Safety, Health and Welfare at Work Act 2005. For ease of reference, in the remainder of this document Focus Engineering Ltd. will be abbreviated to 'Focus'.

### ***Objective***

The policy of Focus is to provide a safe and healthy working environment for all staff, contractors and members of the public who may visit the premises or who may be affected by our operations.

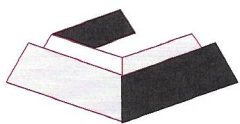
### ***Responsibility***

Focus Engineering recognises its obligations and duties as an employer to direct and manage and to ensure, so far as is reasonably practicable, the safety, health and welfare of all employees, contractors and members of the public who may visit its premises as required under the **Safety, Health and Welfare At Work Act 2005** and all other current regulations (See Appendix 1).

Focus also recognises its responsibility to:

- Provide training where required and instruction to all its employees to enable them perform their work safely and efficiently, so far as is reasonably practicable.
- Make available all necessary safety devices and equipment and to provide adequate training and guidance in their use.

*The Manager, or his nominee, is responsible for co-ordinating Focus Engineering obligations under the Safety, Health and Welfare At Work Act 2005.*



## Staff

Staff have a duty to co-operate with Focus Engineering in the operation of this policy as per Section 9 of the Safety, Health and Welfare at Work Act 2005 as follows:


They are required to:

- Take reasonable care of their own safety, health and welfare and that of any other person who may be affected by their acts or omissions while at work.
- Co-operate with Focus Engineering in complying with relevant statutory provisions.
- Use for protection purposes any suitable appliance, protective clothing, equipment or other means provided for securing their own safety, health or welfare whilst at work and not to interfere with or misuse any such appliance or item.
- Report all accidents immediately no matter how trivial, to their Manager whether to employees or members of the public.
- Report to their immediate Manager without delay any defect in equipment, workplace or system of work, which might endanger their safety, health or welfare at work.

In addition, staff are reminded that:

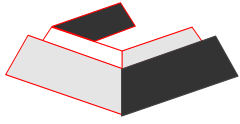
- Any person who is under medical supervision or on prescribed medication and who has been certified fit for work should notify their Manager of any known side effects or temporary physical disabilities which could hinder their work performance and which may be a danger to either themselves or their fellow workers. In this event, the Manager will assign appropriate tasks for that person in the interim.
- Staff are not allowed to attend the premises or carry out duties whilst under the influence of alcohol or illicit drugs. Any person found breaking this rule will be liable to disciplinary action.

Signed:

  
Des Foley, Director, Focus Engineering Ltd.

Dated:

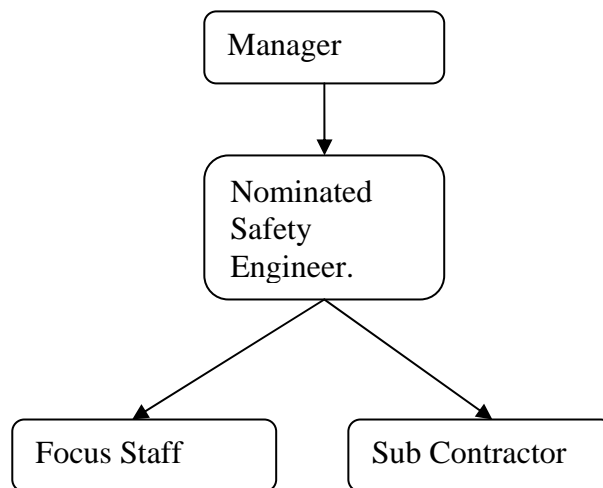
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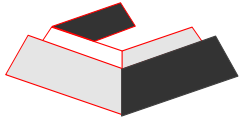


## Safety Management Structure

Persons responsible directly or by formal delegation for:

- The effective implementation of the policy ensuring that their areas of responsibility are run in accordance with the policy.
- Ensuring that Directors, Managers are trained to manage the implementation of the policy.





## Allocation of Responsibilities for Safety and Health

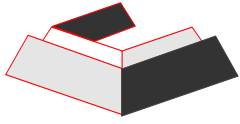
Allocation of Responsibilities for Safety/Health in accordance with the Safety, Health and Welfare at Work Act 2005 are as set out in this section.

### ***Manager***

The overall responsibility for the establishment and maintenance of an effective policy for Safety, Health and Welfare at Work rests with the Manager.

He shall:

- Demonstrate his commitment by taking active steps to be aware of the safety record of the premises and shall issue any necessary reasonable directives in the interest of the health, safety and welfare of all employees and third parties
- Endeavour to ensure that there are available, sufficient funds and facilities to enable the safety policy to be implemented.
- Periodically appraise the effectiveness of the statement. This will be done at the yearly Safety review meetings.
- Ensure that the responsibility is properly assigned, understood and accepted at all levels. This will be a function of the Safety Meetings
- Procure advice and assistance whenever necessary and take heed, together with remedial action, on any matters brought to his attention.
- Monitoring legislation for appropriate changes and amending the safety system accordingly
- Communicating to staff the Safety Statement and providing appropriate training
- Monitor the level of safety at Focus Engineering through risk assessment, accident investigation and the Safety Committee

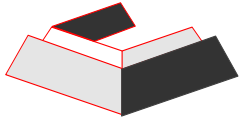


## ***Contract Managers***

The Contracts Manager shall demonstrate their commitment by being fully familiar with Focus' safety statement and any subsequent revisions and ensuring that the safety statement and other plant safety guidance is effectively communicated at all levels and is observed.

They will ensure that reasonable account of health and safety is taken in all areas as follows:

- Demonstrate at all times an exemplary approach to safety and health in order to engender in their staff a total commitment to safety and health.
- Be aware of statutory regulations and the best available working practices and methods of training which they should apply (they should notify their staff accordingly).
- Ensure that their staff fully understands safe methods of work and are suitably trained to carry out their functions.
- Ensure that staff are properly instructed and trained, that they are warned of hazards inherent in the work being undertaken and the need to comply with all safety instructions and statutory requirements.
- Ensure that all injuries and dangerous occurrences are reported and shall investigate the full circumstances causing any injuries, even minor ones, in order to prevent recurrences.
- Endeavour to install an awareness of safety in each employee and conduct regular safety appraisals and will include a reasonable careful check of all new, relocated or repaired equipment before it is passed for operation.
- Ensure that the safety standards set out in this statement, are adhered to at all times by the employees under their control and that disciplinary procedures are complied with if any wilful breach of these procedures occurs.
- Procure advice and assistance whenever necessary and take heed, together with remedial action, on any matters brought to their attention.
- Ensure that any contractors working for Focus observe reasonable safety considerations and that they are aware that any work carried out must be in accordance with current health and safety regulations and any codes of safe practice governing the work being done.
- Ensure that this safety statement is available to and read by all staff within their area of responsibility and appropriate third parties.
- Ensure that full records are kept of all safety training, accidents and any remedial action taken in relation to same.



## ***Safety Committee***

The appointed Safety Committee will:

- Monitor all aspects of health and safety within Focus Engineering.
- Advise the Management on the implementation of this policy and on any revisions required.
- Advise Management on all matters relating to health and safety.
- Ensure that periodic internal housekeeping audits are carried out to identify and eliminate hazards.
- Regularly monitor the implementation of this safety statement and ensure it is understood at all levels in GenSys.
- Advise management on relevant legislation (laws, regulations and directives) which may be relevant to GenSys and its operation.
- Monitor compliance with the Safety Statement.
- Monitor accidents / incidents and provide regular reports to the relevant members of management with advise on the appropriate remedial action.
- Advise and monitor statutory tests on plant and equipment.
- Provide or organise the appropriate training courses to meet identified needs.
- Ensure that health and safety responsibilities are properly assigned and accepted at all levels in Focus.
- Consult the Health and Safety Authority when required.
- If requested, meet the Health and Safety Authority Inspector on visits to Focus Engineering premises.
- Advise Management on action required where improvement prohibition notices or prohibition orders have been served on Focus.

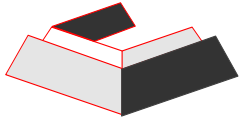
## ***Employees***

**All employees have a collective responsibility for safety in the workplace.**

Employees have general statutory obligations under the Safety, Health and Welfare at Work Act 2005, Part II Section 9 which includes the following:

They must:

- Take reasonable care of their own safety, health and welfare and any other person who may be affected by their actions or omissions while at work.
- Co-operate with their employer and any other person, in order to comply with any of the relevant statutory provisions.



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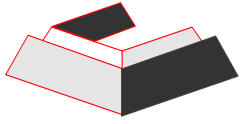
- Use the safety equipment or clothing provided, or other items provided for their safety, health and welfare at work.
- Report to their Manager or Supervisor, without delay, any defects in equipment, place of work or systems of work which might create a danger to the safety, health and welfare to themselves and others.

They must not:

- Intentionally or recklessly interfere with or misuse any appliance, or safety equipment provided to secure the safety health or welfare of persons arising out of work activities.

In addition, employees are reminded:

- Only carry out duties you are trained to perform.
- Keep work areas clean.
- Be careful when moving items.
- Do not run on floors and steps.
- Any forms of dangerous pranks or unauthorised hazardous activities are totally prohibited.
- Any breaches of these obligations or any other health and safety provisions will result in disciplinary action.



## ***Safety Representatives***

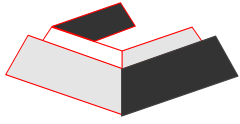
Section 13(3) of the Safety, Health and Welfare at Work Act states that employees may select a Safety Representative who has the following rights under the legislation:

- May make representations on any aspects of safety, health and welfare at the place of work.
- May investigate accidents and dangerous occurrences. They shall not interfere with or obstruct the performance of any statutory obligation required to be performed by any persons under any of the relevant statutory provisions.
- May accompany an inspector on any tour of inspection other than a tour of inspection made by an inspector for the purpose of investigating an accident.
- Subject to prior notice to the employer, he may carry out inspections of the premises to determine any potential hazards on the premises.
- Subject to prior notice to the employer, he may investigate potential hazards and complaints made by any employee whom he represents relating to that employee's safety, health and welfare at the place of work.

## ***Subcontractor/Self Employed Person***

Sub-contractors and self-employed persons shall provide their company **Safety Statement** when requested to do so and shall:

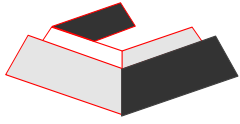
- Conform generally with the duties and responsibilities as for employees.
- Provide evidence when requested, showing that appropriate employer's liability and public liability insurance's are in place.
- Bring to the attention of GenSys and anyone else who may be affected by any process or use of materials which may endanger health and safety while at work.
- Comply with the requirements of this safety statement, and co-operate with site management in providing a safe place of work, a safe system of operation and wearing of protective clothing.
- Ensure all their employees and others under their care are provided with appropriate personal protective equipment, which must include as a minimum, safety helmets, safety footwear, overalls and luminous jackets.
- Attend any safety courses prepared for workers on projects managed by Focus.
- Report any defect in the plant and equipment, place of work, or system of work without unreasonable delay.
- Only use competent and suitable persons on site.



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- Obtain the consent of Focus Engineering to engage persons other than their direct employees on site.
- Ensure that their managers, supervisors and employees are aware of the obligations placed upon them with regard to health and safety.



## **Provision of Safety Training and Instruction**

Focus Engineering undertakes that all necessary training/instruction/information will be supplied to each employee to secure their safety and health in the work place. The primary responsibility for this rests with the Manager.

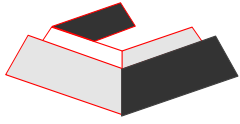
Focus Engineering recognises that even with the best work arrangements people may still need clearly defined safety procedures and instructions. For that reason, there is a commitment by Focus to identify safety training needs, to carry out that training and to assess the competence of employees.

Focus Engineering expects that all employees will co-operate in the training provided. Certain tasks in our operations require that strict safety procedures be followed. Where this arises, the employees involved will receive special instructions by a competent person. It is essential that no person attempt a potentially hazardous task without proper instruction and training. Both formal and on-the-job training programmes are designed so that employees become fully conscious of the need to work safely and have the necessary knowledge and skills to do so.

The induction training includes information on Focus Engineering approach to health and safety and the safety procedures and requirements throughout the premises. On-the-job training focuses particularly on hazardous aspects of each job with a view to ensuring that employees are fully acquainted with the dangers arising from any operation such as working with a machine/ equipment or with potentially hazardous substances.

Additional training courses are provided to meet legislative requirements and specific job needs as they arise from time to time. Such courses may be carried out in-house or at an appropriate outside agency and may include First Aid Training, Manual Handling Training, VDU Assessments, Fire Fighting Training, Spill Response Training, Chemical Handling etc.

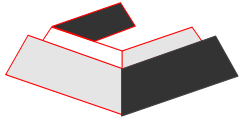
It is recognised that maintaining a safe working environment needs constant vigilance and it is accepted that training of employees will continue to have an important role to play in this regards. Safety campaigns and other methods aimed at maintaining a high level of safety awareness will be instituted from time to time. Similarly, a regular assessment of training needs is carried out, to ensure the updating of employee safety training. The introduction of new machinery/plant/equipment, products/chemicals or processes would automatically necessitate additional training.



## **Provision of Practical and Safe Working Systems**

It is the policy of Focus Engineering to ensure that tasks are within the competence and capacity of each employee. The systems of work will be designed with that purpose in mind. It is clear that some processes necessarily give rise to risks which can only be controlled by adherence to proper procedures. The training provided to workers will identify the areas where care and skill must be exercised.

It is the policy of Focus Engineering when purchasing new equipment, altering existing equipment or changing a system of work, to study such proposed purchases or changes to ensure so far as is reasonably practicable, that they are without significant hazard. Systems of work include all normal work, maintenance work and work by contractors. They will include consideration for the safety and health of visitors/clients. The Management Team will review systems of work on a regular basis.



## **Provision of Personal Protective Equipment**

It is the policy of Focus Engineering to provide appropriate personal protective equipment (PPE) and clothing and to replace it as required.

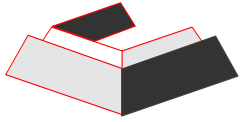
Through experience and on the advice of competent health and safety specialists, Focus Engineering has developed a policy on the use of protective equipment. The obligation to use protective equipment extends to all relevant personnel. All employees are obliged to wear and maintain any such PPE provided to them. Consistent failure to wear PPE can lead to a disciplinary action.

Management is responsible for identifying and procuring the appropriate protective equipment for tasks, which cannot be made safe by any other practicable means. Responsibility for ensuring that the equipment is used and used properly rests with the Manager who will ensure that all employees within their area of responsibility are properly instructed in the maintenance and use of protective clothing and safety equipment.

The policy will be regularly reviewed by Focus Engineering and will be updated when required. The review takes account of experiences to date changes in work arrangements and the use of new materials and processes.

The safety equipment currently supplied includes:-

- Safety Hats
- Protective Overalls
- Safety Shoes
- Safety glasses or face shields for specific tasks
- Safety gloves for various tasks.



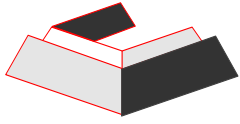
## **Non-Harassment Policy**

Focus Engineering is committed to providing a work environment free of any kind of harassment. Focus Engineering maintains a strict policy prohibiting all forms of harassment. Focus Engineering non-harassment policy applies to all persons involved in the operations of Focus and prohibits harassment by any employee of Focus Engineering, including managers, co-workers and guests, as well as by any person doing business with or for Focus Engineering. Harassment in any form, including verbal, physical and visual conduct, threats, demands and retaliation, is prohibited. Harassment includes but is not limited to:

- Verbal conduct such as derogatory comments, slurs or unwanted sexual advances, invitations or comments.
- Visual conduct such as derogatory posters, photography, cartoons, drawings or gestures.
- Physical conduct such as assault, unnecessary or unwanted touching, blocking normal movement or interfering with work, directed at you because of your sex or race or any other protected basis.
- Threats and demands to submit to sexual requests in order to keep your job or avoid some other loss, and offers of job benefits in return for sexual favours.
- Retaliation for having reported or threatened to report harassment.

If you think you are being harassed on the job, you should use the grievance procedure outlined to file a complaint and have it investigated. In order to secure this right, provide a written complaint to your Manager as soon as possible after any incident you feel is harassment. However, because of the sensitive nature of such a complaint, you may take your written complaint directly to the Human Resources Manager. Your complaint should include details of the incident(s), the names of the individuals involved and the names of any witnesses. Focus Engineering will immediately undertake an effective, thorough and objective investigation of the harassment allegations. Once the investigation is completed and determination is made regarding the alleged harassment, the result is communicated to you as soon as possible.

For further information, see the Human Resources Policy on 'Bullying and Harassment'



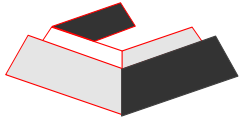
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## First Aid

Focus Engineering is committed to having at least one person in each area who is qualified to administer first aid techniques. Focus Engineering may in the future seek to train additional employees and co-operation in this area is expected.

There is a comprehensive first aid box available in each area to deal with any minor injuries. In the event of a serious injury the ambulance service must be called and the Manager notified. The nearest hospital is Mayo General Hospital.



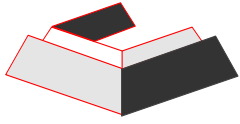
## **Accident/Incident Reporting**

All incidents, no matter how trivial, and whether to employees or visitors must be reported immediately to the Manager or in their absence their deputy on the appropriate form.

This is necessary to monitor the progress of safety standards and to ensure that proper medical attention is given where required and as an aid in the identification of hazards so that the appropriate measures can be taken to prevent the accident from reoccurring.

Where an accident investigation is necessary, all employees are obliged to co-operate fully with such an investigation and to provide any information which may be useful in establishing the circumstances leading up to the accident.

If an employee is absent from work for more than three calendar days due to an industrial injury or illness, it is a statutory requirement (SI No. 44. 1993) that formal notice is given to the Health & Safety Authority on the appropriate form 'IR. 1', (available on HSA web site).

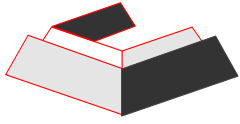


## **Welfare**

To ensure the continued welfare of employees, toilet and cloakroom areas are provided. Tea making facilities are available in all areas and a staff kitchen is available for all meal breaks. Staff must co-operate in maintaining a high standard of hygiene in these areas.

Employees are reminded that:

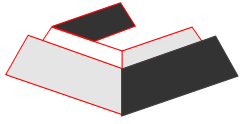
- Focus Engineering adheres to the provision of the Pregnant and Nursing Mothers Regulations 2000.
- If any person who is under medical supervision or on prescribed medication and who has been certified fit for work, should notify their Manager of any known side effects or temporary physical disabilities which could hinder their work performance and which may be a danger to either themselves or their fellow workers. The Manager will arrange to assign appropriate tasks for that person to carry out in the interim.
- Illicit drugs and alcohol - employees are not allowed to attend to work to carry out duties whilst under the influence of illicit drugs or alcohol. Any person found breaking this rule will be liable to instant dismissal.



## **Smoking**

The only place where employees are permitted to smoke are the designated (Outdoor) areas provided. Those who do smoke should ensure that they:

- Carefully extinguish all naked flames, matches/lighters.
- Use the ashtrays/receptacles provided.
- Make sure that all cigarette ends are fully extinguished when finished.

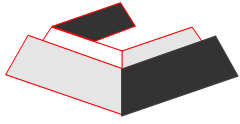


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## Disciplinary Action

Where advice and persuasion fail to achieve compliance with safety and health rules, it is the policy of Focus to take disciplinary action on the matter.



## Management Review

The Management Review is held annually.

It will contain details in the following areas:

- *Safety Performance*

1. Number of incidents/near misses reported
2. Number of first aid incidents.
3. Number of workdays lost as a result of incidents.

- *Safety Training*

Details of any safety training carried out during the year, both internal and external.

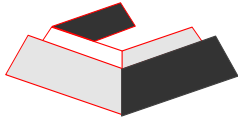
- *Future Safety Requirements*

Discussion of any areas of safety, health or welfare that need to be addressed in the future as a result of new legislation, incident history or any new work practices.

- *Safety Goals for the Future*

It is the responsibility of the Management Review to compile, issue and circulate the safety goals for the future following each Management Review Meeting.

Focus Engineering would welcome any comments/queries or suggested initiative from any member of staff.

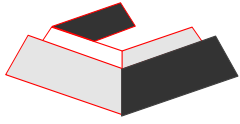


## Contractors

- Contractors will not be allowed to carry out work until Focus Engineering has checked and is satisfied with their insurance status.
- The contractor must liaise with a Company appointed official and discuss and agree the safety precautions deemed necessary by either party.
- Contractors must take all due care of their own safety, the safety of their employees and all others affected by their work.
- Contractors must not use any equipment or the service of personnel belonging to or engaged by Focus without prior approval being granted by Focus Engineering appointed official.
- Scaffolding and other access equipment used by contractors/sub-contractors must be erected and maintained in accordance with current standards and regulations.
- Every contractor must comply with all applicable statutory requirements, best industry practices and any special safety rules or conditions imposed by Focus Engineering.

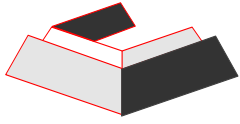
In this regard, it is the responsibility of the contractor to:

- Provide all necessary instruction, training and information on health and safety matters to their employees.
- Provide competent and adequate supervision of their employees and activities.
- Provide all necessary personal protective equipment for their employees
- All plant and equipment brought onto site must be safe and in good working order fitted with any necessary guards and safety devices and with any necessary certificates available for checking.
- Ensure that all accidents and dangerous occurrences are reported to the Manager in charge.
- Ensure that all safety notices and alarms are followed at all times.
- Ensure that hazardous substances are not brought on to site without prior notice and permission.



- Ensure that 'approved' hazardous substances are stored and used safely whilst on site.
- Ensure, on completion of work, that all hazardous substances are removed from site.
- Monitor and assess the safety performance of their employees.
- Ensure that all subcontractors are advised accordingly and, in particular, are not brought onto site without prior notice or permission.
- Prior to the commencement of any work on site the following criteria should be observed:
  - Both parties must undertake an assessment of the likely safety hazards and risks involved in or associated with the proposed work. The extent of each party's involvement will be determined by the separate sets of safety responsibilities as agreed.
  - The degree of risk assessment that must be carried out before work begins will depend on the nature and extent of activities associated with each individual contract.
  - No work, not matter how minor, should commence without some form of prior consultation, hazard identification and risk assessment.

For major contracts, the provisions of the Safety, Health and Welfare at Work (Construction) Regulations, 1995 must be adhered to.

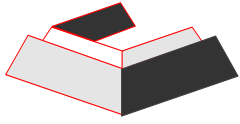


## **Visitors to Focus Engineering**

Focus has a legal duty to ensure the Safety, Health and Welfare of all visitors. In practice, any company employee who receives a visitor is responsible for their safety until they leave the premises. Visitors are required to stay at reception until escorted to the relevant area within the premises.

All employees should:

- Ensure the visitor is escorted at all times or to the place of work.
- Visitors must not be allowed to walk around the building if they are not familiar with the premises.
- Visitors must not tamper with any Company equipment.
- Visitors must not leave the premises without informing reception.
- Visitors should be advised of the procedure on Fire Alarm or other emergencies.



## **Appendix 1 Current Relevant Legislation**

- Factories Act 1955 (small sections applicable).
- Safety in Industry Act 1980 (small sections applicable).
- Fire Services Act 1981 (and statutory instruments attaching thereto).
- Safety, Health and Welfare at Work Act, 2005
- Safety, Health and Welfare at Work (General Application) Regulations 1993.
- Safety, Health and Welfare at Work (Pregnant Employees) Regulations 1994.
- EU Law relating to health and safety issues.