CDB Consulting Engineers Limited Mechanical, Electrical & Public Health Design Engineers

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Document no: 100.001

Date : 1st January 2010

HEALTH & SAFETY POLICY DOCUMENT

COMPLIANCE POLICY



The fundamental objective of compliance at CDB Consulting Engineers Limited (CDB) is the continuous focus on creating a satisfied client through the services provided. The achievement of satisfied clients results in the generation of new orders from existing and new clients and it is recognised that this is the only source for producing the profits that enable us to maintain a progressive and health business.

CDB combine under compliance the quality, health, safety and environmental disciplines to ensure that produce integrity is satisfied by rigorous implementation of design basis, legislative, contractual and management system requirements. CDB are also fully committed to conducting all of our operations so as to protect human health, safety, the environment and property, and so as to prevent pollution.

Good compliance performance is a line management responsibility and is fundamental to the company's long term success and it is therefore an integral part of our business plans. As part of our drive for continuous improvement we will:

EFFECTIVELY MANAGE COMPLIANCE ISSUES BY:

- Delegating accountability, responsibility and resources for activities required to implement this policy.
- Communicating openly on our compliance programmes and performance.
- Complying with relevant laws, regulations and industry standards.

• Maintaining existing systems to ISO 9001, ISO 14001, OHSAS 18001 and IIP, and using these as a basis for systems implemented in other business areas.

FIND COST EFFECTIVE WAYS TO MINIMISE RISK BY:

- Identifying and assessing environmental, health, safety, and business hazards.
- Prevention, control and mitigation of risk to the lowest reasonably practicable level.

INVOLVE OUR EMPLOYEES, CONTRACTORS AND BUSINESS PARTNERS BY:

- Providing appropriate information, instruction and training.
- Encouraging participation in improving compliance performance.

CONTINUOUSLY IMPROVE OUR PERFORMANCE BY:

- Maintaining and analysing records.
- Auditing our management system performance.
- Taking corrective and preventive action to eliminate repeat non-conformances, incidents and accidents.
- Implementation of improvements based on the results of audits, monitoring and reviews.

• Setting and reviewing objectives and targets at the annual compliance review and implementing them as management programmes.

This policy applies to all employees.

The original policy has been signed by the Managing Director, copies are displayed at strategic locations, advertised on the internet webpage and will be provided upon request.



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1. INTRODUCTION

This document is a high level bridging document for the integration of quality, safety and environmental activities and defines the roles and responsibilities and the hierarchy of documentation of the company management system. The intent of this document is to illustrate the breakdown of the hierarchical documented management system as well as identifying the roles and responsibilities of the executive management.

2. BUSINESS OBJECTIVES

2.1 CDB operates to a philosophy of "satisfied clients". This is achieved through a policy of working to agreed procedures such that projects are completed:

- On time.
- To the correct requirements (contractual, health, safety, quality, environmental)
- Giving value for money (controlled costs)
- 100% complete (first time every task)
- At lowest overall cost in meeting requirements
- With risks properly identified and managed.

2.2 CDB also operates a system of "improving all the time", and actively seeks to identify areas of potential improvement, implement the necessary changes, and develop the necessary skills.

2.3 CDB undertakes the following types of work:

• The core activities of design engineering and M & E project management or parts thereof, of complete Mechanical, Electrical & Public Health building services, or individual components for Mechanical, Electrical & Public Health building service contracts including the M & E Designs to enable the installation of new or existing building contracts, operation or maintenance of Buildings and associate Designs or modifications to mechanical, electrical and/or public health Building Services.

- Provision of other miscellaneous Building Design services as considered appropriate.
- Provision of other miscellaneous Building Design services to the Oil, Gas & Nuclear industries

• Providing general design in building services to the utilities (water, power, rail and building services sector.

• Working towards being a key partner to oil, gas and/or Nuclear companies and other contractors.

• Undertaking international Designs to Mechanical, Electrical & Public Health Services within its capabilities.

2.4 Achievement of the stated business objectives is the cornerstone of CDB's compliance policy and performance against them shall be measured and reported.

3. ORGANISATION

3.1 Corporate Structure and Method of Operation

3.1.1 CDB is a privately owned Limited company that is principally owned by the management board of Directors. The company is supported by management personnel with extensive experience in the works being undertaken.

3.1.2 The legal structure, and management organisation for CDB is depicted in the organisation chart as detailed in document 000.002

The management structure describes the basic intent, however, it is designed to have a non hierarchical approach and be flexible such that it can be adapted to enable the company to provide the service to suit opportunities for business expansion, growth and diversification. Job titles may vary from project to project.

3.1.3 The Managing Director is responsible for approval of the policy documents that are intended to comply with the Compliance Policy. The procedures that describe how the policies are to be implemented are to be approved by the Manager designated as the owner of that procedure.

3.1.4 CDB has a positive approach to the implementation of formal management systems. The Compliance Manager is authorised to implement and maintain management systems at all locations to work towards the appropriate standards.

- ISO 9001 Quality Management Systems
- ISO 14001 Environmental Management Systems
- OHSAS 18001 Occupational Health and Safety

3.1.5 CDB is an equal opportunity employer and is committed to providing equal opportunities for all persons regardless of their sex, race, nationality, religion or belief, sexual orientation, age or disability. Reference in the procedures and other documents to male employees shall be interpreted as applying equally to female employees unless specified otherwise.

3.2 Project Organisation and Opportunity Management

3.2.1 The company recognises that projects are the mainstream of its business and implements a policy of high project orientation. The company also recognises that turning opportunities into projects is also key to future prosperity.

3.2.2 The Project Manager (PM) is the person delegated the responsibility for SATISFYING THE CLIENT. He/She is the one person to be supported as he/she is responsible for the custody of THE SINGLE SOURCE OF INCOME for the business. The Project Manager reports to the Managing Director.

The designated Project Manager is fully empowered to take the necessary actions, operating within company procedures and agreed budgets, to ensure that project objectives are satisfied.

3.2.3 Opportunities are treated in a similar manner to projects where an entrepreneur is delegated the responsibility to take the opportunity forward to become a company or contract.

3.2.4 It is the responsibility of the Heads of Department to plan for and supply the service to meet the project, company and opportunity requirements. They are also responsible for developing company procedures relating t their areas of expertise, and ensuring that these are adhered to on projects.



3.2.5 The company management systems, policies, procedures and business processes are designed to be used on all projects. However, particular project requirements are addressed by production of project specific procedures. Project procedures shall adhere to the basic principles defined in the company policies and procedures, but may differ in matters of detail. The procedure owner is required to take the lead in making improvements to their procedures and in co-operating with other managers where the business process includes multi-department interfaces. Changes and improvements to procedures must be approved by the procedure owner, as well as project specific procedures.



4. **RESPONSIBLTIES**

4.1 Corporate

The overall direction of the company is managed by the Board of Directors together with the day to day running of the business.

A brief description of the responsibilities and interrelation of the company management is given in the following sections – these are amplified in appropriate procedures and organisation charts. Actual job titles may vary from time to time.

4.1.1 <u>Managing Director (MD)</u>

The MD is responsible and accountable to the Board of Directors for the implementation of the agreed and approved action programme for the business. He is responsible for the overall co-ordination of the company's business and for the profitable achievement of the business goals and objectives as agreed in his action programme.

4.1.2 <u>Associates</u>

The Associate Director has particular responsibility to the MD for ensuring that the HS&E Management Systems are properly implemented and performing to requirements.

4.1.3 <u>Head of Compliance</u>

The Head of Compliance is responsible to the MD for overall policies and objectives regarding quality, health, safety and environmental matters and is responsible for the establishment and continuing improvement of the Compliance Management System. In this capacity, the Head of Compliance shall also ensure that company's senior management receives regular information on the performance of the compliance management system.

4.1.4 <u>Project Managers</u>

Responsible to the Head of Compliance for leading the project to successful completion, on time, within budget, and to the requirements. The Project Manager acts as the Contractor's Representative on all client related project matters. An entrepreneur delegated responsibility for realisation of an opportunity into a project may also be called a Project Manager.

Project Managers prepare and agree action programmes with the Head of compliance. The action programme identifies his/her business focus, results to achieve, the project organisation structure and how to achieve the delegated responsibilities.

4.1.5 Business Development Manager

Responsible to the MD for the successful development of the business areas/units to which they are assigned as considered necessary.

Responsible for:

• Maintaining ongoing relationships with potential clients such that business opportunities are clearly identified, and that the CDB goals are aligned to satisfy the clients' needs. The result being continuity of tenders, proposals and potential for diversification.

• Marketing, Estimating/Proposals. Tender preparation and submission.



4.1.6 <u>Department Heads</u>

Responsible to the Head of Compliance for the provision of support and services to the, Business Unit Managers.

4.1.7 <u>Finance</u>

Responsible for:

• Finance and Accounts. The effective and cost controlled management of all aspects of company finances with specific responsibility for budget control, budget reporting, cash control, cash management, tax, project financing, currency exchange and company statutory matters.

4.1.8 <u>Human Resources</u>

Responsible for the development of the organisation with the main focus on:

• Human Resources management ensuring that we employ modern systems and practices in order that we are able to employ the best personnel.

• Supporting management in development of their action programmes in order to create the communication system that is aligned with the overall company strategy and direction.

4.1.9 Engineering

Responsible for:

• Controlling all engineering activities and appointing competent personnel to ensure that the necessary engineering technologies and services are adequately provided to the projects, business units and for tendering.

• Ensuring that all designs, whether undertaken by CDB or its subcontractors, meet the requirements, including company philosophies of enhanced profitability through continual improvement.

- Ensuring that design reviews and independent verifications are performed.
- Provision of Drawing Office and Document Control services including archiving.

4.1.10 Operations Board

The Operations Board consists of the MD, all other Directors, Associates and the Heads of Engineering, Finance, Administration, Procurement, Compliance and ICT.

Responsible for:

• The performance, planning, provision and utilisation of resources, cost control and services to projects and business units such that their activities can be completed on time, to budget, safely and to the requirements.

• Engineering procurement and project managing construction projects including, design, drawings, bulk material purchasing (as appropriate) methods, production working drawings control, planning, materials control, industrial relations, safety, environmental, subcontracting, maintenance, and office administration.

4.1.11 Procurement and Materials

Responsible for:

- The development of the organisation, operational philosophy, procurement and supplier lists to be used as main guidelines by the projects.
- The definition, development and implementation of the materials management computerised system, integrated to the management systems.
- Providing procurement support and services to the projects, business units and for tendering, covering purchasing and logistics in accordance with their needs. Liaison with Compliance relative to provision of supplier inspection services.
- Providing procurement resources to the projects of adequate number and quality.
- Negotiate, implement and make available to projects frame agreements for the purchase of bulk materials (if considered appropriate).

4.1.11.1 Construction Project Management Responsible for:

- Provision of expertise in order to ensure projects are bid such that they are able to be constructed in a cost effective manner.
- Provision of input into man hour estimates, plans and histograms.
- Provision of resources of sufficient quality and quantity to satisfy the needs of the projects, such that productivity is maintained at a high level.
- First line responsibility for health, safety, environmental and quality requirements.

4.1.11.2 Compliance Health & Safety Policy Responsible for:

- Overall policies and objectives regarding quality, health, safety and environmental matters.
- Acts as the custodian of the company management system.
- Provision of competent resources to the projects and also competent resources to act in auditing and monitoring roles.
- Ensuring that the company is working towards the requirements of ISO 9001
- Ensuring that the technical integrity of the company's products is satisfied by rigorous implementation of the design basis, legislative, contractual and management system requirements.

4.1.11.3 Information and Communications Technology and Systems (ICT)

Responsible for overall information technology policies and to define the hardware, software and technologies standards regarding the information systems and communications

- Provision of specialised support to the final users in the projects, departments and facilities.
- Operate and maintain the network infrastructure.
- Co-ordinate hardware and software assets purchasing and monitor and control the allocation of such assets to projects and departments.

• Oversee the interfaces between functional areas with the focus on the overall optimisation of business processes.

4.1.12 <u>The Individual</u>

Each individual is responsible for the quality of his or her own work, the safe execution of such work with due recognition for protection of the environment and with awareness of company and project policies and procedures.



5 MANAGEMENT REVIEW

The management system and manuals and their implementation shall be reviewed periodically to ensure that company objectives are being achieved, that company procedures are being adhered to and that all requirements are being met. These reviews are conducted at various levels and under different circumstances, for example through audits at contract review meetings, at design review meetings, at business unit review meetings and at Board meetings as appropriate.

As a minimum, a minuted management review meeting, addressing each of the Compliance disciplines, shall be held at approximately 12 monthly intervals for the business.



6 MANAGEMENT SYSTEM DOCUMENTATION

6.1 Policy Document and Procedures

Procedures have been or will be established and developed for the following business activities:

CDB-100.000	Company Safety Policy Statement	
CDB-100.001	Safety Policy Documents	
CDB-201.001	Quality Policy Documents	
CDB-202.001	Environmental Policy	
	Documents	
CDB-203.001	Design Documents	
	Engineering	
CDB-204.001	Drawing Office	
	(CAD Procedure)	
CDB-205.001	Procurement	
CDB 207.001	Construction Project	
	Management – Site	
	Documentation	
CDB-210.001	Human Resources	
CDB-212.001	Finance	
CDB 213.001	Commercial & Tendering	
CDB-218.001	ICT & Computer Systems	
CDB-220 001	Mechanical and Electrical	
	Completion and Inspection	
CDB 800 001	CAD Drawings & Blocks	

6.3 Procedure Ownership

Owners are nominated for the production, maintenance and continuous improvement of each of the business processes and procedures including liaison relative to the interface with other owners. Procedures can only be amended with the owner's knowledge.