



CYBARCO LTD.

**COMPANY'S HEALTH & SAFETY
MANAGEMENT SYSTEM**

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CYBARCO LTD.

Health & Safety Management System

1. PREFACE

This document is intended to describe the Safety Management System of Cybarco PLC and thus to provide information about the health and safety organization and resources which our Company proposes and undertakes to provide to safeguard the health and safety of operatives, including those of subcontractors and any person who may be affected by our works and operations.

Cybarco PLC is one of the leading construction, civil engineering and property development companies on the island of Cyprus. A member of the long established Lanitis Group of Companies, Cybarco was founded in 1945. Over the past five decades, its considerable experience in every branch of the construction industry has won the company a wide range of contracts for major national infrastructure projects. Today Cybarco's achievements in the field of commercial and industrial sectors corroborate a reputation for quality and reliability. Numbering the Governments of Cyprus and of the United Kingdom among its clients, Cybarco has been commissioned to construct airports, dams, power stations and sewerage systems, as well as a large part of the road network of Cyprus. It has also won contracts for quality housing developments, office complexes and public buildings. The Company has its own plant, equipment and manpower, and provides a wide range of subsidiary services.

The Company's Health and Safety Policy states among others that:

“...Health and Safety is an important issue for all of us in the Company. For the improvement of the Occupational Health and Safety Management System that was introduced and established in the company in 1996. Health and Safety issues shall have the same importance and priority as the rest of the issues the company is managing....”

The Company is proud for being the first construction and civil engineering company on the island that have introduced and successfully implemented an Occupational Health and Safety Management System, as it is advocated by the British Standard Guide 8800:1996 and today by the British Standard Guide 18001:1999.

The introduction process of the System has helped tremendously the cultivation of a positive Safety Culture at all levels of the organization as the people of the company went through the process of change.

The Company cooperates with qualified Safety and Health professionals to lead the efforts for the implementation of the Health and Safety Management System.

This cooperation is continuing for the monitoring and auditing of the System in order to safeguard its continuous successfulness.

The results of this effort were tangible. Safety standards and accident rates improves and as a result the Company won many times the Safety Shield in the context of the annual National Safety Competition.

2. HEALTH AND SAFETY POLICY DOCUMENT OF CYBARCO

A. General Policy Statement

1. The Management of the Company, recognizing that the continuous improvement and maintenance of the working conditions at high level for all our employees is a very important issue, decided to adopt and introduce this Policy Statement on Occupational Health & Safety.
2. The Management is committed to work towards the success of the aims and objectives of the Policy providing all the necessary resources. For this success, it is vital to be recognized by everybody working in the Company, that a close cooperation at all levels of the company and by all sides (Management and Workforce) is needed.
3. Health and Safety is an important issue for all of us in the Company.
4. For the improvement of the Health and Safety standards, the Management is committed to follow and maintain effectiveness of the Occupational Health and Safety Management System that was introduced and established in the Company in 1996.
5. Health and Safety issues shall have the same importance and priority as the rest of the issues the company is managing.
6. The improvement and maintenance of high Health and Safety standards is considered as a very important parameter of the quality production process.
7. For all of us in CYBARCO, our manpower is the most important asset.

B. Aims of the Policy

1. The primary aim of our Health and Safety Policy is the upgrading of the Health and Safety Standards in all the activities of the Company.
2. Our intention is to create and maintain a working environment for every employee, where all the hazards should be identified and all the subsequent risks should be controlled by the taking of all the reasonably practicable measures.
3. Furthermore, our intention is to manage the activities of the Company in such a way as to minimize the risks not only for our employees but also for the public in general and the physical environment.

C. Objectives of the Policy

The general objectives of the Policy are:

1. The successful operation of the Occupational Health and Safety Management System.
2. The reduction of all accidents and occupational diseases to the minimum.
3. The identification of all hazards, the assessment of all risks and the implementation of the appropriate control measures so as to minimize risks.
4. The continuous monitoring of the effectiveness of the control measures and the reviewing of them when necessary.
5. The provision of effective supervision and instruction in all the activities and for all employees so as to ensure their health and safety.
6. The provision of adequate Safety training and information.
7. The cultivation of a positive Safety Culture which implies a collective commitment to health and safety.
8. The further improvement of cooperation in health and safety issues through the effective operation of the Safety Committees.
9. The provision of Safe Systems and Methods of Work, especially where the consequences of risks may be high.
10. The strict implementation of safety criteria for all the subcontractors that the company is cooperating with.
11. The compliance with the existing Health and Safety Legislation.

D. Objectives of the Policy

The Policy is approved by the Senior Management Team of the Company after appropriate consultations in the Central Health and Safety Committee.

E. Reviewing of the Policy

The Reviewing of the Policy is done on a regular basis, once every year. To this effect the Central Safety Committee holds a meeting at the end of January. The proposals of the Committee are submitted to the Senior Management Team for final approval. The Committee has the right to propose the revision of the Policy before the end of the year if it believes that this is necessary.

F. Signing of the Policy

The Policy document is signed by the Chief Executive Officer

G. Communication of the Policy

- 1.** The Health, Safety and Environmental Officer makes the necessary arrangements to bring the Policy Statement and any revision of it to the notice of all the employees of the Company.
- 2.** The Policy Statement may also be communicated to organizations and bodies that the Company has reasons to believe that the aims and objectives of the Policy are served by doing so.

3. RISK ASSESSMENT PROCEDURES

The assessment of all risks is one of the objectives of the Company's Health and Safety Policy, included in section C of the Policy document. General objectives 3 & 4 read:

"The general objectives of the Policy are:

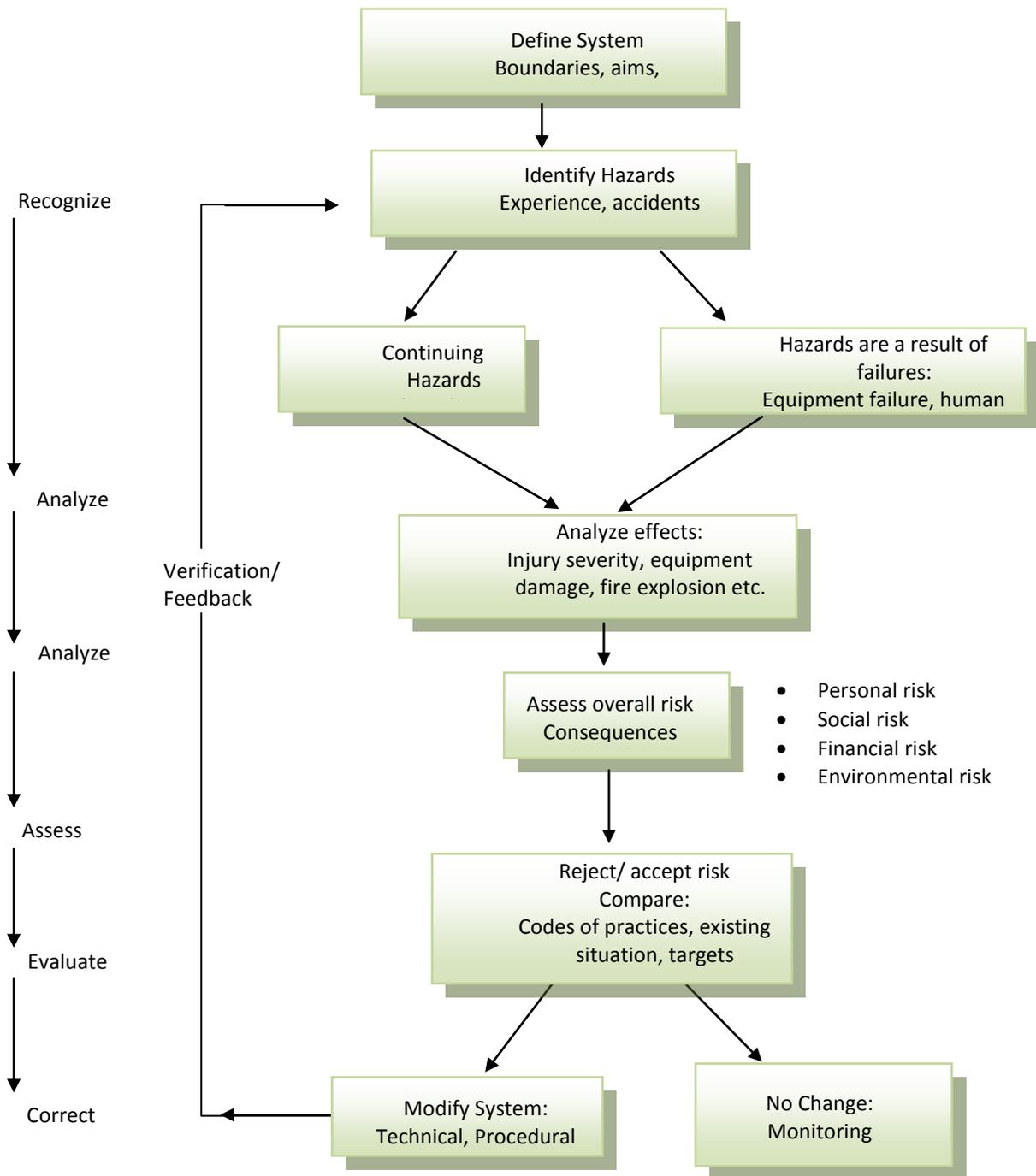
- 3. The identification of all hazards, the assessment of all risks and the implementation of them when necessary.*
- 4. The continuous monitoring of the effectiveness of the control measures and the reviewing of them when necessary.*

To achieve these objectives, the Company has developed and implements a certain procedure. All the Managers, Engineers, Supervisors and Foremen of the Company received adequate training on how to apply risk assessment effectively. For the general workplace hazards, the following process of risk management is applied:



To estimate the risk level and to prepare the risk control plan, reference is made to the tables D.1 and D.2 of the B.S. Guide 8800:1996 and Guide 18001:1999 which the Company has implemented.

For high hazardous situations where the risks are expected to be complicated the procedure applied is shown in the next diagram.



Risk Assessment Procedure

The risk assessment procedures as well as the risk control measures are documented and copy is kept in the Safety File of the Site. To facilitate the thorough assessment and management of all risks special prompt lists were developed. A sample is given hereafter.

**HAZARDS IDENTIFICATION AND RISK CONTROL PROMPT – LIST
Construction Sites**

Location: No. of Employees	Date:
Evaluator:	Page 1 from 5

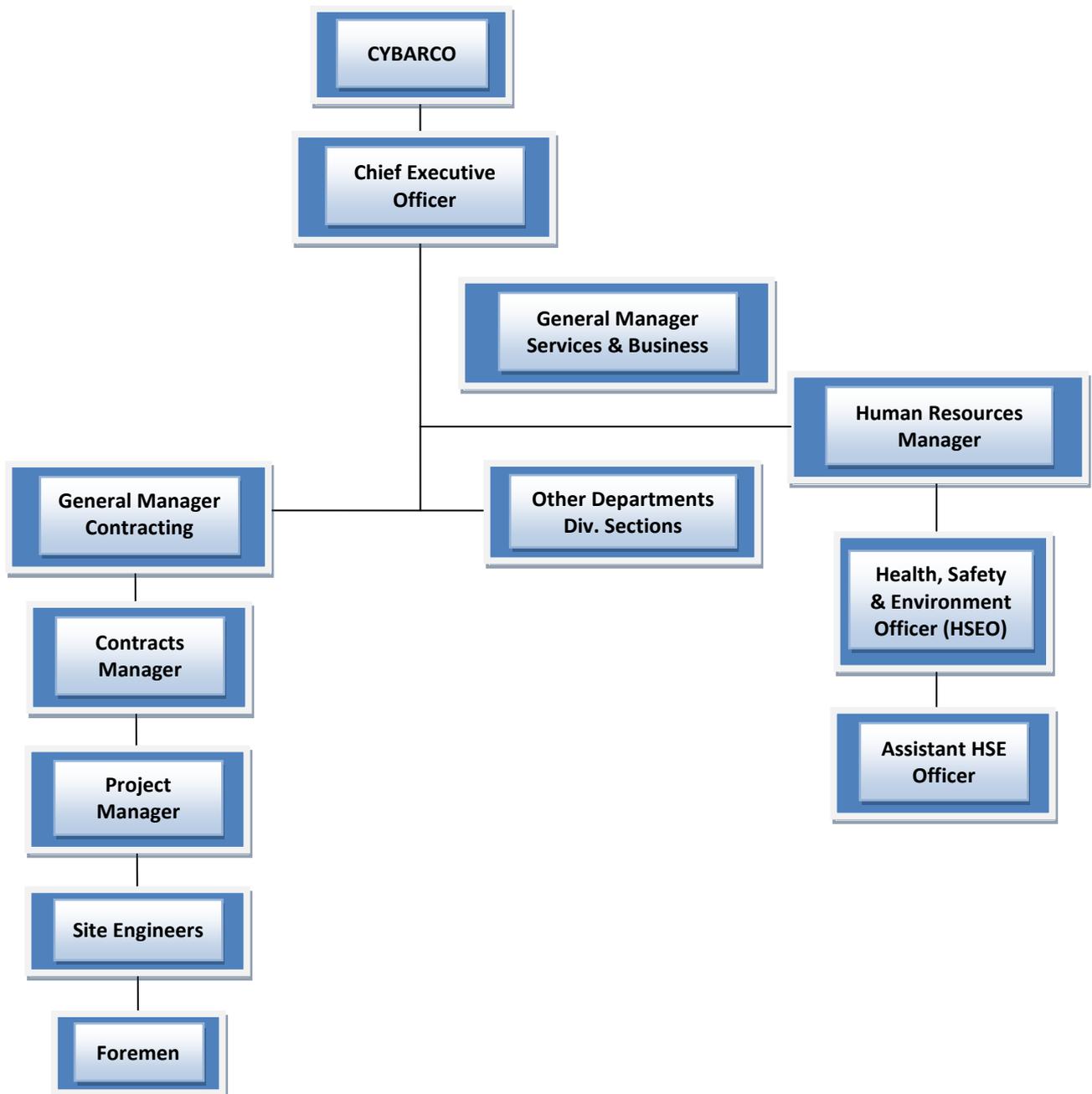
1.0	Access/ Egress – Movement	Y/N	Are the existing risk control measures satisfactory (enter Y/N)	Propose risk control measures	Have the risk control measures implemented successfully? (enter Y/N)
1.1	Walls, working platforms and floor openings				
1.2	Staircases				
1.3	Ladders				
1.4	Corridors				
1.5	Exposed nails				
1.6	Vehicle movement				
1.7	Housekeeping				

Hazard Analysis Worksheet
Workplace:

No.	Hazard Reference Number	Consequences	Risk Level : 1 = High 2 = Medium 3 = Low	Risk Control Measures	Implementation of measures (Date)

4. ORGANIZATION AND RESOURCES

The Company's Corporate Organization Chart is shown in a separate sheet. The Health and Safety Organization of the Company is presented below:



The duties and responsibilities of the Managers at all levels of the hierarchy, the Health & Safety Environment Officer (HSEO) and the Assistance Health & Safety Officer, the Supervisors, Foremen, employees and Safety Representatives duties are given in detail in the following sections of this document.

It is worth mentioning at this point that the Company is cooperating and uses the services of an External Safety & Health Adviser for specialized matters. The Adviser is responsible to assist the Company to cope with the Health, Safety and Environmental demands of the contracts, to train the staff, to prepare method statements, to carry out risk assessment of certain high risk activities etc. He also monitors the effectiveness of the control measures and submits relevant reports to the Company.

Safety Committees are also in place as it is provided by the relevant regulations.

Finally, it should be stressed that the Company allocates all the necessary financial and human resources to secure, so far as it is reasonably practicable, the highest safety and health and environmental standards on all the construction sites, both for the people working there as well as the people that may be affected by the works.

4.1 Health & Safety and Environmental Officer (HSEO)

Cybarco employs for the last 10 years a full time Officer for the Safety and Health Issues. As the environmental aspect is getting more and more important, the element of the environment was recently added to the duties and responsibilities of the Officer thus the new title is now named the “Health & Safety and Environmental Officer”

The main duties of the post with regards to safety, health and environment include the:

- Inspection of the workplace of the company in order to identify hazards assess risks and suggest the necessary control measures for the elimination or reduction of risks.
- Investigation of all accidents, occupation diseases, incidents and dangerous occurrences and the preparation and submission of relevant reports.
- Monitoring of the effective functioning of the Safety Committees.
- Monitoring of the compliance of the company with the existing legislation.

For the effective implementation of the Policy and the compliance of the company with the legal obligations, the additional functions of the Health, Safety and Environmental Officer (HSEO) are:

1. To record and to keep records for all accidents, occupational diseases, incidents and dangerous occurrences.
2. To keep and analyze statistics of all accidents, occupational diseases, incidents and dangerous occurrences.

3. To investigate all accidents, occupational diseases, incidents and dangerous occurrences and to prepare and submit relevant reports.
4. To monitor the compliance of the company with the existing legislation.
5. To cooperate with any external Safety Adviser or Consultant appointed by the company for health and safety matters.
6. To assess workplace risks and suggest the necessary control measures for the elimination or reduction of risks.
7. To keep records for:
 - i. All hazards identified;
 - ii. The existing and recommended control measures, and
 - iii. The monitoring for the effective implementation of those measures.
8. To take all the appropriate measures for the implementation of the Policy and to prepare and submit proposal for the reviewing of the Policy when necessary.
9. To act as the Secretary of Central Safety Committee.
10. To make the necessary arrangements for the election of the Safety Representatives and the establishment of the Safety Committee.
11. To monitor the effective functioning of the Safety Committees, to record and study the recommendations submitted by the committees and to provide for the implementation of these recommendations.
12. To chair those Committee that the General Manager (contracting) may decide.
13. To give advises to the employees of the company on health and safety matters ad to consider and examine any relevant suggestions or complaints that may be submitted by any employee.
14. To prepare and submit to the Personnel Manager and to the Central Safety Committee, by the end of every January, a report with regards to the progress made for the implementation of the Policy for the year before.
15. To keep up-to-date with the development occurring in health and safety and to inform the management for any such development that are related with the activities of the company.

16. To cooperate with all the departments and divisions of the company and their managers for health and safety issues.
17. To keep records for the fire fighting equipment and in cooperation with the Plant Manager to make provisions for the maintenance and testing of the equipment and organization of fire drills and other emergency and evacuation exercises.

4.2 Health and Safety duties and responsibilities for the rest of the staff.

Health and safety is an issue for everyone in the company. Therefore, the people at all levels of the hierarchy have special active roles as well as relevant duties and responsibilities that are described below:

- a. **General Duties and responsibilities of all Managers at all levels:**
They have the overall responsibility for the implementation of the Policy and they should ensure the successful implementation of the Health & Safety Management System in the area of their competency and/or Department. They should also:
 - i. Provide every possible assistance to the HSE Officer for the execution of his duties and responsibilities,
 - ii. Cooperate with the HSE Officer for the implementation of the recommendations and suggestions with regards to the control measures to be taken to reduce risks.
 - iii. Ensure the implementation of the necessary arrangements as they are described in the manual “Health & Safety Management System”.

b. Human Resource Manager

He has the overall responsibility for the implementation of the Policy in his division and he should ensure that Health and Safety is managed as an integral part of the day-to-day decision making process. Furthermore, he should:

- i. Ensure the maintenance of effective communication systems as they are described in the manual “Health & Safety Management System”.
- ii. Ensure the keeping of the financial records related with accidents, incidents and dangerous occurrences as ill health as well as the prompt settlement of the claims from the insurance companies and the benefits from the Social Insurance Fund.
- iii. Have the overall responsibility for the implementation of training programmes in health and safety.

- iv. Ensure that the duties and responsibilities for health and safety are included in the job description.

c. Plant Manager

The Plant Manager, in addition to paragraph (a) above, has the responsibility to:

- i. Ensure the good condition, safety and proper use of all plant, machinery and equipment used at work (except the personal protective equipment), so as to be free from unreasonable risks to the persons using them.
- ii. Ensure the regular testing and maintenance of cranes, hoist and other lifting appliances, emergency repair work and safe methods of doing it.
- iii. Ensure that the fire precautions are taken in all the premises and sites of the company (maintenance and testing of fire fighting equipment, fire fighting equipment, fire drills and evacuation procedures, fire exits, etc.).
- iv. Provide in cooperation with Safety Officer, the necessary technical and other engineering support, including expertise and qualified personnel from his department, for the implementation of the technical risk control measures.
- v. Make sure arrangements to secure that the purchasing or hiring of plant and machinery, takes serious consideration of the health and safety standards. European and other recognised international standards, where reasonably practicable, are the preferable reference standards.

d. Contract Managers

They have the overall responsibility for the implementation of the Health and Safety Policy of the company at the workplaces under their responsibility. They are responsible for the implementation of the obligations undertaken by the Principal Contractor under the contracts.

e. Site Engineers

They should:

- i. Ensure in cooperation with the Project Manager, the identification of hazards at the workplace and the implementation of the appropriate control measures to reduce risks.
- ii. Implement the relevant arrangements described in the “Health & Safety Management System”.

- iii. Keep updated the “Safety File” of the site.
- iv. Cooperate with the Safety Officer and they should ensure that his recommendations for control measures are implemented.

f. Supervisors and Foremen

They should:

- i. In cooperation with the Site Engineer, supervise, instruct and inform the workers for the appropriate safe methods of work and the precautions to be taken so as to minimise risks for them.
- ii. Ensure for the prompt implementation of the hazard control measures.
- iii. Behave in such a way as to give the good example to the workers.
- iv. Report to the Site Engineer every health and safety problem that comes to their attention.
- v. Ensure the good housekeeping of the site, and the safe keeping, maintenance and good condition of the personal protective equipment of the site.

g. Assistance Safety Officer

The Company appoints Assistance Safety Officer according to the demands of the specific contracts, who are continuously present on the site. Under the close cooperation and supervision of the HSE Officer, their duties include, further to the ordinary duties of the HSE officer described elsewhere, the representation of the Company on the site for the everyday health and safety matters.

h. Safety Representatives – Safety Committees

The duties and responsibilities of the Safety Representatives and the Safety Committees, are as described in the “Safety Committees Regulations 1988”. A copy of the Regulations should be available for every Committee Member. The President of the Committee are appointed by the Management of the company as it is provided by the Regulations.

i. Employees

Every employee has the right of a safe and healthy working environment:

- i. at the same time every employee has the duty to work and act in such a way so as to avoid expose of himself and of other persons to unnecessary risks and he/she should:
- ii. be concerned and caring about the good housekeeping of the workplace and the cleanness of the hygiene and meals taking facilities,
- iii. follow the instructions given by the company for the safe execution of work,
- iv. report immediately to the supervisor/foreman any health and safety problem that comes to his/her attention.
- v. use the personal protective equipment provided and ensure the good condition such equipment.
- vi. cooperate with all the supervisors/foremen and any company representative at the workplace to enable the effective implementation of the policy.

They all receive adequate training provided internally by the HSE officer.

4.3 Central Health and Safety Committee

To discuss the issues of health and safety and to advise the senior management team about, this Committee was set up with the following role and responsibilities:

a. Role and responsibilities

The role and responsibilities include the following:

1. Monitor the progress achieved in the implementation of the Policy.
2. Evaluate and to approve the organization and arrangements for the effective implementation of the Policy.
3. To receive information about all accidents, incidents, dangerous occurrences and occupational diseases and to evaluate the effectiveness of the measures taken to control risks and to avoid recurrence of undesired events from similar causes.

4. To receive information for all matters of health and safety of the company and to evaluate the safety standards.
5. To discuss the Policy and the reviewing of the Policy and to submit recommendations to the Senior Management team according to the provisions of sections D and E of the Health and Safety Policy Statement.

b. Composition

1. President : General Manager Contracting
2. Secretary: HSE Officer
3. Members: Plant Manager
4. Contract Manager (one)
5. Human Resource Manager
6. Workers Representative

c. Functioning

1. The committee shall hold two regular meetings a year. It shall also meet after any serious accident or dangerous occurrence and at any time the President or the majority of its members consider necessary.
2. The Secretary, has the responsibility to call for the meetings. In cooperation with the President he shall prepare and communicate the agenda and provide all members with the necessary information including documents, prior to the meetings to enable the effectiveness of the meetings.
3. The Secretary shall prepare and circulate the proceedings

5. HEALTH AND SAFETY TRAINING

In Cybarco we believe that:

- i. Training is closely related with the creation and cultivation of safety culture.
- ii. Training is required by the legislation.
- iii. Training is an important procedural measure to control risk.

Recognising the importance of training, Cybarco has adopted and implements a special training Policy which is as follows:

5.1 Training Policy

“Cybarco pays particular attention to health and safety training for all the employees of the company.

To this effect the company is committed to ensure that every employee receives continuously adequate training, information and instructions specific to the needs of the company and the individual tasks.”

The main objectives of our Policy are:

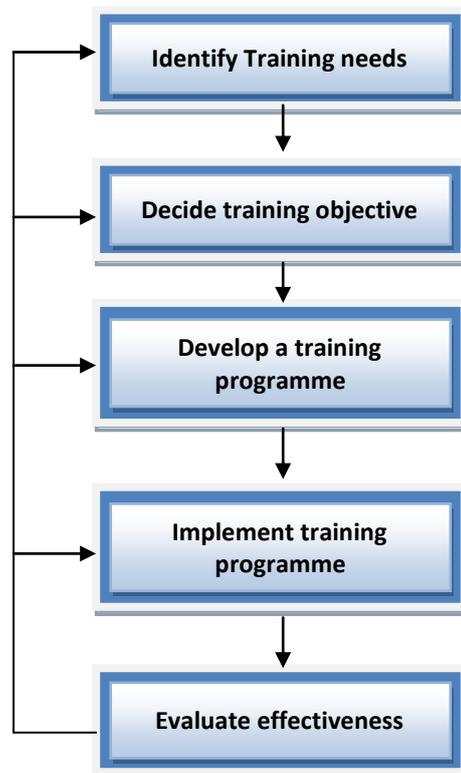
- *To develop safety culture,*
- *To teach risk management,*
- *To foster a “safety first” attitude,*

Training shall be provided:

- *on recruitment,*
- *in the event of transfer or a change of job,*
- *in the event of introduction of new work equipment or change in equipment,*
- *in the event of the introduction of new technology.*

Furthermore, training, instructions and information shall be:

- *adapted to take account of new or changed risks,*
- *repeated periodically if necessary.*



To approach training in the company on a systematic basis, the typical training cycle advocated in HSG (65) shall be followed.

The Human Resource Manager in cooperation with the Health, Safety & Environment Officer (HSE) are responsible for the overall implementation of this Policy.”

5.2 Training Records

The company keeps detailed training records for all programmes either external or internal.

6. SUB-CONTRACTORS: SELECTION AND HEALTH & SAFETY MANAGEMENT

The selection of all Subcontractors and Suppliers is managed by CYBARCO on the basis of established ISO9001:2000 written procedure which include specific criteria. Under the company’s Occupational Health and Safety Management System, all Subcontractors have specific obligations. The obligations for safety are part of their contract with CYBARCO, and a copy is kept in the Safety File.

CYBARCO as a principal Contractor, recognises that the cooperation of subcontractors is essential to fulfil its duties arising out of the requirements for safety of this contract, in order to:

- achieve effective coordination and cooperation of contractors in managing the work of health, safety and welfare on site;
- ensure that contractors comply with the rules in the health and safety plan and;
- provide the planning supervisor with information for compiling the health and safety file.

The reasonable steps to be taken to check that a subcontractor is competent and has allocated or will allocate adequate resources at either stage include:

- a. the arrangements the contractor has in place to manage health and safety including fire safety actively;
- b. the procedures the contractor will adopt for developing and implementing the health and safety plan;
- c. the approach to be taken to deal with the high risk areas identified by designers and the planning supervisor;

- d. the arrangement the contractor has for monitoring compliance with health and safety legislation;
- e. the people to carry out or manage the work, their skills and training;
- f. the time allowed to complete the various stages of the construction work without risks to health and safety, and;
- g. the way people are to be employed to ensure compliance with health and safety law.

7. SUPPLIERS

It is the CYBARCO's policy that all Suppliers will provide the company with the necessary information regarding the health and safety of their products. The Purchasing Manager shall ensure that this policy is effectively implemented.

8. PROTECTION OF THIRD PARTIES THAT MAY BE AFFECTED BY THE WORKS AND SAFETY PROCEDURES CONCERNING THE ENTRY OF VISITORS IN THE CONTRUCTION SITES

The Project Manager is responsible to ensure that all appropriate control measures are taken so as to prevent any healthy problems for any individual member of the general public or to any property controlled by third parties.

To this effect, all associated hazards must be identified and the necessary measures shall be taken to avoid risks. The procedure for that is described in the Safety Plan and is kept in the Safety File.

The following rules are fundamental and shall be strictly enforced:

- Any reasonable complains for third parties shall be investigated as soon as possible and action must be taken to control risks if any. Reasonable answers must be given to satisfy those being complained.
- Safe diversion routes must be made where appropriate to safeguard drivers and pedestrians. Effective signalling and signing must be applied where necessary.
- As a general rule, no children are allowed to visit or enter the site and adequate measures shall be taken to make this impossible even when the site is closed.
- All construction sites are surrounded by a substantial fencing fitted with gates to ensure so far as it is reasonable practicable, the safety of any third parties from the work activities of the site, as well as to ensure that unauthorised person cannot enter the site. In addition, warning signs must be in place

stating clearly that the entry of unauthorized person in the site is strictly prohibited.

The following procedures are applied with regards to the entry of visitors into the construction sites of the company:

1. Authorized persons are any persons that they have either the right to visit the site (e.g. Clients, Government Inspectors, persons specified in the contract, etc.) or they have granted permission by the Site Manager.
2. A visitors' registry is kept on the site stating the name of the visitor, the time of entry and exit from the site.
3. Every visitor must wear a safety helmet during his/her visit in the site.
4. Every visitor must be accompanied by a company representative and explained the hazards at the site.
5. If parents visiting the site are accompanied by children, arrangements should be made for the safe stay of the children in the offices of the site, but never unattended under any circumstances.

9. MEASURING AND REVIEWING PERFORMANCE

In order to maintain and continuously improve the Safety Management System that Cybarco has introduced, the performance of the System is measured periodically.

The main purpose of measuring performance is to assess and evaluate the adequacy of the company's health and safety performance. The findings of measuring and auditing are used for reviewing the situation for the continuous improvement and development of the System.

The measurement system of the company, is designed to promote compliance with safety plans (designed to achieve the objectives) and with legislation, not just to check compliance. Another target of the system is the use of a combination of performance measures. As we believe that there is no single measure of safety and health performance, which is unambiguous and wholly resistant to abuse.

Therefore a range of pro-active, re-active and direct outcome indicators, performance measures and measurement techniques are used to achieve a balanced measurement system tailored to the needs of the company.

9.1 Auditing

In addition to the routine measurement of performance, the system is undergoing annually through an Auditing procedure so as to provide assurance of effectively controls to management of managerial and operational systems.

Cybarco's Safety Auditing is designed to check:

- a. If management procedures for the effective implementation of safety management systems are : (i) in place, (ii) in use, (iii) work in practice.
- b. The success of management if setting the objectives and meeting the targets.
- c. The progress over time.

9.2 Periodic status review

The company is also carrying out a periodic status review in order to maintain a successful Safety Management System. The periodic status review considers the findings of the performance measurements and auditing, the initial status review, and is designed to accommodate or adapt to the external and internal factors, influencing the company and thus the performance.