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VINCENT CALLINAN ENGINEERING LTD.

Est since 1994

STAINLESS STEEL PIPE & MECHANICAL INSTALLATIONS FOR THE FOOD, PHARMACEUTICAL, BEVERAGE AND CHEMICAL INDUSTRIES.

COMPANY SAFETY STATEMENT. January 2015



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Introduction

The management of Vincent Callinan Engineering Ltd have prepared the following document, to meet our obligations to our employees' health and safety as specified in the Safety, Health and Welfare at Work Act 2005 and the Safety Health and Welfare at Work Regulations 2007 (General Applications). We have identified, as is our duty as employers, hazards in the workplace, the risks arising from such hazards, the manner in which the safety, health and welfare of our employees is secured and the arrangements and controls employed to achieve this. In short, this Safety Statement is our action programme illustrating how health and safety is managed in the Vincent Callinan Engineering Ltd workplace.

Document Details

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Approval: Vincent Callinan: Managing Director.

Prepared by: Paddy McHugh

Edited by: Paddy McHugh, Health and Safety Advisor

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Emergency Services.

Emergency Services:

• Ambulance/Fire 999 or 112

■ Gardai 999

Utilities:

■ Irish Water 1890 278 278

• ESB Networks 1850 372 757

• GAS Networks Irl 1850 20 50 50

Health and Safety:

■ HSA 1890 289 389

■ EPA 01-6674474

Safety Advisor Paddy McHugh 087 2113333

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Statement of General Policy.

This document outlines Vincent Callinan Engineering Ltd. Safety Policy.

It is the policy of Vincent Callinan Engineering Ltd. to comply with the Safety, Health and Welfare at Work Act 2005 and all regulations stipulated there-under, relevant to our daily operations.

A copy of our Safety Statement is distributed to all of our Site Managers, Forepersons, and Supervisors and shall be made available to the Client's Safety Officer on request.

Key to our strategy is a premium of communication between all employees and Company management in order to identify and eliminate any potential hazardous materials, situations or working conditions in the work place. It is important that all employees, whether experienced or new, feel both confident and compelled to communicate any such concerns with management or responsible personnel. This communication ethic extends to others, not employed by Vincent Callinan Engineering Ltd., but who share the same working environment. We feel all personnel sharing a work-site have a responsibility for each other's safety and due care and attention should at all times be observed

Compliance with regulations will be monitored by regular site inspections by our Safety Advisor/Officer, or appointed person, on whose observations the practical safety strategy of Vincent Callinan Engineering Ltd, will be assessed and improved.

| Signed | Date |
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Environmental Protection Strategy.

Vincent Callinan Engineering Ltd, in accordance with its own Safety Policy and adhering to official legislation, is committed to providing a Safe and Healthy workplace both for its employees and anyone affected by our activities. Vincent Callinan Engineering Ltd. recognise that there exists a duty of care on our behalf to minimise our emissions, whether noise or refuse, and safely dispose of the latter in accordance with Environmental protection legislation and consultation with the relevant local authority. All staff are required to comply with this policy by minimising waste creation and co-operating actively with recycling programmes.

The production of waste, be it by-products of fabrication or general personal refuse shall be kept at a minimum. That waste which does arise shall be disposed of regularly and safely and it is the responsibility of the Site Foreperson, to provide suitable waste receptacles and ensure that arrangements are made for the collection/emptying of receptacles at a suitable frequency.

It is the responsibility of all other employees in collecting waste to avoid handling overfilled bags etc to minimise the risk of a manual handling injury or to promote rodent infestation in the workplace. Delegated waste collection points shall be kept in a clean, accessible condition with due regard to fire prevention.

Due care shall be taken to reduce ambient noise in the workplace so as not to exceed regulation decibel levels. In the case where a workplace borders a residential area extra consideration must be given to those residents and all employees are instructed not in any way to partake in activity that impacts to the detriment of their living environment. Records shall be kept of the actions taken to ensure and maintain environmental good practice.

Vincent Callinan Engineering Ltd. current activities on site do not create emissions at odds with Environmental Protection Legislation. However we are not complacent and remain vigilant, with all employees and management committed to a high level of environmental protection.

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Protective Clothing and Equipment Policy.

It is the policy of Vincent Callinan Engineering Ltd. to provide personal protective equipment (PPE) to its employees. It is the responsibility of the Site foreperson to ensure that the equipment is used and maintained properly. All equipment must conform to the BS/EN standard and carry the CE mark.

The Safety, Health and Welfare at Work Act, 2005, states that it will be the duty of Vincent Callinan Engineering Ltd:

"In circumstances in which it is not reasonably practicable for an employer to control or eliminate hazards in a place of work under his/her control, or in such circumstances as may be prescribed, the provision and maintenance of such suitable protective clothing or equipment, as appropriate, that are necessary to ensure the safety and health at work of his/her employees."

Equally the responsibility lies with the employees as stated in the Safety, Health and Welfare at Work Act 2005, to ensure the proper use and maintenance of their personal protective equipment:

"To use in such manner so as to provide the protection intended, any suitable appliance, protective clothing, convenience, equipment or other means or thing provided (whether for his/her use alone or for use by him/her in common with others) for securing his/her safety, health or welfare while at work."

Smoking Policy

It is the Policy of Vincent Callinan Engineering Ltd to comply with and enforce the No Smoking in the Workplace legislation that is in force. All Vincent Callinan Engineering Ltd workplaces are therefore smoke-free as all employees have a right to work in a smoke-free environment. Smoking is prohibited throughout the entire workplace with no exceptions. Smoking is only allowed in designated areas which are clearly identified. This policy applies to all Vincent Callinan Engineering Ltd employees, consultants, contractors, customers and visitors.

Overall responsibility for policy implementation rests with the duty holder with responsibility of safety. All Vincent Callinan Engineering Ltd staff have an obligation to adhere to, and facilitate the implementation of this Policy.

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SECTION 1

Duties of Care

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1.1 Duties of the Employer:

Under Section 6 (general duties of the employer) of the Safety, Health and Welfare at Work Act 2005 it is the duty of every employer to ensure as far as is reasonably practical:

- a safe place of work.
- safe means of access and egress
- safe plant and equipment
- safe systems of work operating procedures.
- Provision of appropriate information, instruction, training and supervision
- provision of suitable protective clothing or equipment where hazards cannot be eliminated
- preparation and revision of emergency plans
- designation of staff having emergency duties
- prevention of risk to health from any article or substance including plant, machinery and equipment (particularly relevant in chemical production systems).
- Provision and maintenance of welfare facilities
- Provision, where necessary, of a competent person to advise and assist in securing the safety, health and welfare of employees. (A competent person is someone with appropriate training and practical experience in the specific task required).

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1.2. Implementation of Safety Statement Recommendations.

The management of Vincent Callinan Engineering Ltd. is very aware that new and young employees are unlikely to have been exposed to the type of hazards pertinent to our working environment, and of the acute dangers faced by this vulnerable section of our workforce. We feel it imperative they are made to understand our level of commitment to their safety, of the hazards they are likely to meet, and our methods for eliminating such hazards.

This is achieved on site, by our Site foreperson and/or our Safety Advisor issuing a copy of our safety statement to the employee, highlighting particularly relevant policy issues to them and assuring them of the importance of a high level of communication between them and management. They must be made aware that their activities now represent Vincent Callinan Engineering Ltd. and as such our policy must be adhered to.

New employees must be informed of relevant safety policy enforced by the Client. For the duration of the contract, no work may be carried out in the plant without first consulting production and maintenance personnel and the completion of required permits. These include 'Hotwork', Work at Height, General Work, 'LineBreaking' and 'Lockout' permits. Client policy in these matters supersedes Vincent Callinan Engineering Ltd's policy and in effect we adopt Client policy for the duration of the contract. The intricacies of the system must be clearly explained to any new employees before they commence work in the facility. It must be stressed to them the dangers of abuse of the system as the chemicals in the plant are toxic and the only way to ensure everyone's safety is to strictly adhere to established protocols.

The adherence to the Clients as well as Vincent Callinan Engineering Ltd safety policy for the duration of projects extends to the emergency and evacuation procedures adopted on the site.

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Section 1.2

Delegation of Duties of Care At Site level

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1.2.1. Duties of The Managing Directors

- To review and update regularly the company safety policy and statement in view of changing business, new regulations, changes in management etc.
- Monitor the effectiveness of the safety statement and improve where necessary.
- To ensure that all relevant documentation relating to accidents, dangerous occurrences and statutory records are maintained.
- To ensure that adequate resources (financial, manpower, equipment, training and supervision) are made available.
- To designate one or more competent employees to carry out activities specified by him, which are related to the protection and prevention of occupational risks in the work place.
- To co-operate with other employers on matters relating to Health and Safety when sharing a work place.
- To ensure that those persons given responsibilities in this safety statement have the means to carry out such responsibilities.
- To ensure that only competent persons are employed by the company, and to take any necessary action in instances where he/she is made aware this is not the case.
- .To report how the safety statement was complied with when making annual returns.

| Signed | Date |
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1.2.2. Duties of the Site Foreperson

It is the responsibility of the site Foreperson, to:

- Ensure that Health and Safety Regulations and the Company Safety Policy are followed and to insist that the prescribed standards are observed.
- To examine the workplace regularly for potential hazards and to ensure that these hazards are eliminated or appropriate controls adopted and followed.
- To ensure that in so far as is reasonably practical safe systems of work are in place and followed.
- Maintain a tidy workplace. Ensure that cleaning up takes place regularly or as work is carried out and places of work and access routes are kept clear.
- To ensure that all employees and visitors under our control wear personal protective equipment where required, particularly Safety Helmets, Safety Boots, glasses and/or other items required to be worn by the client.
- To ensure that only trained operatives are employed on equipment and machinery for which such training is required.
- To ensure that all plant and machinery including power and hand tools. are in a good condition and maintenance procedures are in place as required.
- Ensure any defects in plant and equipment are rectified.
- To ensure general safety inspections are carried out.
- Hold "Tool Box" talks and keep attendance records in the site safety file.
- To ensure that adequate fire fighting equipment is available where necessary.
- To ensure that the site first aid box is adequately stocked and maintained.
- To ensure that all power tools are 110 volts.
- To issue permits and to ensure that the requirements for these permits are maintained e.g. hot work permit, line breaking permit, valve lockout permit etc. when competent to do so.
- To ensure that all ladders are secured while in use, in good condition and suitable for the work being carried out, and to keep records of their condition.
- To issue warnings both written and verbal if required or instructed to.
- To carry out Site Induction for all employees when they first arrive on Site.

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1.2.3. Duties of Safety Officer

It is the responsibility of the Safety Officer to:

- Carry out periodic site inspections and document findings.
- Monitor all aspects of Health and Safety in the company.
- Inspect and advise on the site safety file when carrying out inspections.
- Advise management on legislation, which is relevant to company activities.
- Report on accidents, incidents and/or dangerous occurrences should they occur on site, as laid down in Safety Management System document.
- Organise training to meet identified needs.
- Liase with the Contracts Manager and Site foreperson on matters relating to Health and Safety.
- Monitor P.P.E usage and advise site management on type of protective equipment required.
- Liase with Health and Safety Authority/Main Contractor/Client when required.
- To carry out site inspections and suggest improvements to be made.
- Arrange distribution and maintenance of fully stocked first aid boxes on site.

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1.2.4. Duties of employees

It is the responsibility each employee of Vincent Callinan Engineering Ltd. to:

- Take reasonable care of your own Health and Safety and that of any other person affected by your acts and/or omissions. The employee behaves at all times as carefully as is reasonably practicable.
- Undertake to co-operate with their employer and any other person to such an
 extent so as to enable them to comply with any statutory provision as regards
 Safety, Health and Welfare in the work place.
- Report to your Site foreperson without delay any defect in plant, equipment
 place of work or system of work which might create a danger to the Safety,
 Health and Welfare of any person of which you become aware.
- Use the correct tools and equipment for the job.
- Keep tools in good condition and replace as necessary.
- Report all accidents and dangerous occurrences to the Site Foreperson..
- Not to carry out any task for which you have not got the relevant experience, training or instruction.
- To wear safety Personal Protective Equipment (PPE)
- Take account of any site specific information/training provided to you by the client (i.e. the Induction by the Client on specific sites).

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Section 3.

Hazards

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3.1. Hazard Identification

A Hazard is anything that can potentially cause harm. The first step in safeguarding safety and health is to identify hazards. Vincent Callinan Engineering Ltd. is committed to investigating the place of work systematically and identifying existing hazards.

The following checklist provides a systematic, though non-exhaustive approach for examining a site for hazards, prior to the commencement of work there.

Common Causes of Accidents are:

- Mishandling goods or equipment
- Falling Objects
- Slips, trips and falls
- Poor Housekeeping
- Disc Cutters (Angle Grinders, Chop Saw)
- Electrical portable power tools and equipment
- Misuse of Chemicals
- Working at height/ mobile elevated work platforms
- Fire

Common Hazards to Health include:

- Noise
- Dust levels
- Manual Handling Injury
- Poor lighting
- Extremes of temperature
- Injury through poor design of tasks or machinery

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3.2. Assessment of risks:

Where a hazard exists it is our duty as an employer to determine the likelihood of it causing an accident to any of our employees, the consequences of it happening, and to keep a written record of the risk assessment. We acknowledge that there always difficulties in assessing risks and we utilise 'best practice' in any activity as our yardstick. Some risks, such as exposure to chemicals or noise, may require physical measurements to be taken. Risk will depend on many, often related, circumstances. The management of Vincent Callinan Engineering Ltd. assess risk using the following criteria:

- Is anyone exposed to the hazard?
- Is the hazard likely to cause injury?
- Is the hazard well controlled?
- Is the level of supervision adequate?
- How are employees exposed and what are the levels of exposure that should not be exceeded? (apply to chemicals, temperature, noise etc.)
- Are any group of employees at unusual risk? (e.g. pregnant women or disabled employees)

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3.3. Hazard assessments

Hazard:

1. Mishandling goods or equipment

Exposure of Personnel to risk:

The physical nature of many of the projects undertaken makes this a very relevant hazard in the daily activity of Vincent Callinan Engineering Ltd. employees.

Possible risks of Hazard:

- Ligament or muscle strains
- Fatigue
- Abdominal hernias
- Paralysis/death

Controls of Hazard:

- Full training and instruction provided in both induction and on-going safety training.
- Instruction to all employees to lift only light loads
- Weights marked on all loads.

Responsible personnel:

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2. Falling Objects/material:

Exposure of Personnel to risk:

The physical nature of many of the projects undertaken makes this a very relevant hazard in the daily activity of Vincent Callinan Engineering Ltd. employees.

Possible risks of Hazard:

- Cranial injury
- Injury to upper body or limbs
- Heavy objects falling on feet.

Controls of Hazard:

- Safety helmets and glasses to be worn at all times.
- Safety boots to be worn at all times.
- Tools to be lifted by rope to areas at height.
- Employees should exhibit an awareness of their surroundings at all times.
- Stable storage facilities for materials.

Responsible personnel:

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3. Slips, tips or falls.

Exposure of Personnel to risk:

The nature of the working environment, where many of the projects undertaken occur makes this a very relevant hazard in the daily activity of Vincent Callinan Engineering Ltd. employees.

Possible risks of Hazard:

- Cuts, bruises and lacerations
- Broken bones / Amputation
- Internal injuries
- Death

Controls of Hazard:

- Attention to house-keeping.
- Maintenance of good quality foot-ware.
- Adequate supervision when working at height or on slippery surfaces.
- Barriers to prevent falls from open sides of buildings to be installed
- Keep all walkways free from obstruction.

Responsible personnel:

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4. Poor Housekeeping

Exposure of Personnel to risk:

- Waste accumulation
- Untidy workplace

Possible Risks of Hazard:

- Rodent Infestation
- Un-Safe access/egress
- Risk of injury from slips, trips falls.
- Falling objects.
- Fire due to refuse as kindling

Controls of Hazard:

- Tidy up work area after each task.
- See, Vincent Callinan Engineering Ltd. Environmental Strategy.
- Designated areas for storage of material will be enforced.
- Suitable bins and skips will be provided
- Store flammable liquids properly.
- Obey no smoking rules.
- Provide pedestrian walkways and keep free from obstruction.
- Wear appropriate personal protective equipment.
- Holes and openings will be securely fenced off or covered
- Adequate lighting will be provided.

Responsible personnel:

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5. Disc Cutters (grinders and chop saws)

Exposure of Personnel to risk:

In our capacity as a pipe-fitting and maintenance service provider, we at Vincent Callinan Engineering Ltd utilize metal cutting equipment on a daily basis and as such it poses perhaps the greatest hazard in our daily operations. A fitter's helper must not use power tools unless trained to do so, and under the supervision of qualified and competent personnel.

Possible Risks of Hazard:

- Bodily injury (Cuts/lacerations)
- Eye injury (flying pieces of debris)
- Loose clothing may become caught in moving parts
- Electrocution, due to laceration of power cable with cutting disc.
- Disintegration of disc

Controls of Hazard:

- Ensure all employees properly trained to use the angle grinder/ chop saw.
- Provide suitable and adequate personal protective equipment (PPE).
- Ensure eye protection (safety glasses/ goggles) worn when using angle grinder.
- Guards to be kept in place at all times.
- Regular inspections of the equipment to be carried out by a competent person.
- Make all employees, especially vulnerable personnel i.e. new or young workers are aware of the danger of loose clothing when using such equipment.
- Ensure supply of suitable fire extinguisher in the work area (adherence to client's 'Hotwork permit' system).
- Provide adequate ventilation and light in the work area, using an extractor fan where possible.

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Hazard: 6. Electrical portable power tools and equipment

Exposure of Personnel to risk:

Portable electric tools are an every-day utensil for our employees and as such present a constant threat to their welfare. It is imperative therefore to be aware of all risks associated with their use and how to eliminate these risks.

Possible Risks of Hazard:

- Electrocution
- Non-earthed metal work
- Hand/eye injuries
- Serious bodily injury

Controls of Hazard:

- All portable electric tools will be less than 2 horsepower operated at less than 110 volts
- All fuses must be in accordance with recognized BS standards.
- Cleaning and adjustment of equipment only to be carried out when the power source has been disconnected
- Tools and cables must not be left in damp conditions or near water deposits.
- Where transformers are used they will be placed at the power source ensuring there is no strain on the mains power cable.
- The supply and distribution of electricity on the site should be planned in advance taking into account, power and range of voltages required and the distribution network.
- Ensure all employees properly trained in the use of electrical power tools.
- Equipment to be inspected before work commences and any defects reported immediately to the Site foreperson.
- All plugs making connections to power points will be of perfect quality
- Electric tools or equipment not double or fully insulated should have their metal parts effectively earthed.
- Connections to plugs must be properly made so that the cable grip holds the cable firmly and prevents the earth from being pulled out.
- Purchase equipment suitable to recognized BS standards.
- All equipment to carry the CE mark.
- All defective equipment to be given to the Site foreperson.
- Suitable PPE to be worn for the job
- Regular inspections to be carried out on all electrical equipment by a competent person (electrician).
- Records of inspections to be kept in the Site Safety File in the site office.
- Provide suitable fire extinguishers in the work area.
- Ensure adequate ventilation.

Responsible personnel:

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7. Misuse of Chemicals

Exposure of Personnel to Risk:

Chemical substances are utilised in practically all working environments. They range from everyday products such as glue to industrial solvents such as acid. It is Vincent Callinan Engineering Ltd. policy to ensure all necessary precautions are taken when dealing with such substances, the proper PPE being issued and documentation being completed.

Possible Risks of Hazard:

- Immediate problems, e.g. flammability, toxicity.
- Likelihood of explosion
- Long term effects of exposure on health e.g. is it carcinogenic
- Likelihood of skin problems
- Likelihood of chest problems (respiratory irritation or sensitisation i.e. asthma)

Controls of Hazard:

- Provision of PPE
- Adherence to client safety protocols
- Consultation with client staff on all system changes (opening of valves, breaking of chemical lines. etc)
- Consultation with client staff on toxicity levels of all relevant chemicals
- Provide adequate ventilation for the work area.
- Store materials in accordance with manufacturer's instruction.
- Provide first-aid facilities including eye-wash and shower facilities (When working on-site close communication with the client Safety officer on such provisions is essential before commencing any work).
- Provision of proper fire extinguishers.
- Identification of harmful materials and substances in the preliminary plan, before the job commences.
- Use of Materials Safety Data Sheets (MSDS).
- Safe systems of work will be established and all employees informed before any work starts.
- Ensure employee training on the use, handling and storage of substances hazardous to health.
- Good standards of personal hygiene.
- Tidy up work area after job completion.
- High standards of housekeeping.
- All personnel must be informed of the emergency protocols put in place in the case of a chemical emergency before the commencement of any work.
- Provision of an emergency respirator for the duration of any project in a chemical environment

Responsible personnel:

Client Safety Officer, Client Production Manager

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Hazard: Working at height

- Ladders
- Mobile elevated work platforms

8.1 Ladders:

Exposure of Personnel to risk:

The installation of pipe-work often occurs at an elevated level, whether above outside storage tanks or platforms or above head-level in an indoor environment. Risk can occur at height from exposure to the following circumstances:

- Not securing top or bottom of ladder
- Ladder not extended properly
- Uneven surface
- Over-reaching on ladder
- Working beside power lines
- Carrying loads on the ladder

Possible Risks of Hazard:

- Falling from ladders due to slippage of ladder.
- Back injury while carrying/ Erecting ladders

Controls of Hazard:

All controls and resources employed, to prevent risk in the use of ladders, have been introduced upto and including ladder assessments and ladder checks.

Responsible personnel:

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8.2 MOBILE ELEVATED WORK PLATFORMS (MEWP):

The use of MEWPs may only be conducted by qualified personnel.

As only qualified people may use this apparatus it is assumed that they are aware of the safety precautions required for its use. A copy of the qualification-course content/certificate for personnel is available on request, and should be refreshed by the qualified operator of the MEWP before use.

Responsible personnel:

Qualified personnel

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9. Fire:

Exposure of Personnel to risk:

In dealing with electric equipment, metal cutting apparatus, various chemical substances and other combustibles, Vincent Callinan Engineering Ltd acknowledge the elevated risk of fire in our undertakings. We therefore understand the need to assess such risk and implement necessary controls.

Possible Risks of Hazard:

- Health/injury risks eg. Burns, respiratory damage, death.
- Damage to property/ plant.

Controls of Hazard:

- Suitable fire extinguishers/blankets to be provided for each work area.
- Strict housekeeping to be maintained including the separation of flammable liquids and combustible materials.
- Obey no smoking policy.
- Comply with all Client evacuation and emergency drills and assess Vincent Callinan Engineering Ltd. personnel performance
- Ensure employee awareness of emergency and evacuation procedures.
- Never fight a fire unless trained and confident of doing so.

Responsible personnel:

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10. Noise

Exposure of Personnel to risk:

Exposure to high or sustained noise levels can cause incurable deafness often accompanied by a ringing in the ears. Noise also interferes with communications and so increases the risk of accidents and as such is an important issue for Vincent Callinan Engineering Ltd.

Possible Risks of Hazard:

- Permanent hearing loss
- Temporary hearing loss

Controls of Hazard:

A copy of the HSA's 'Guidelines to Noise Regulations' is included in the Safety File. We at Vincent Callinan Engineering Ltd. Are committed to enforcing all the authorities' guidelines in this matter.

Responsible personnel:

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11. Dust

Exposure of Personnel to risk:

Dust, whether it be related to the work environment such as client produce or self produced such as by-product of metal fabrication, poses a significant health risk to all. Vincent Callinan Engineering Ltd. is committed to the reduction of dust in the workplace and the implementation of all possible safety procedures where this is not possible.

Possible Risks of Hazard:

- Breathing difficulties/Asthma
- Skin disorders
- Eye damage
- Combustible dust products may cause fire or explosion

Controls of Hazard:

- Adherence to no-smoking policy.
- Provision of suitable eye protection PPE where air quality is deemed to be poor (safety glasses, dust-masks, ventilated respiratory equipment where necessary).
- In the case of an 'enclosed space entry' air quality must be verified and monitored by a competent person.
- Ventilation system to remove dust at source.
- Ensuring that the exposure of employees or others to dusty environments is kept to an absolute minimum and prevented where possible.
- Consultation of Client personnel on the nature of any dusty environment encountered and utilization of any client protocols relevant.
- Ensure that control methods provided are properly used and maintained, and by monitoring the work environment as necessary.
- Provision of health surveillance to empoyees, where a hazard has been identified,
- Provide employees with the relevant information on any risks that exist in the workplace and of any control measures that are in place to reduce those risks.
- Adequate arrangements made for air sampling as necessary.
- Consultation with other contractors to ensure they produce no conditions hazardous to the respiratory health of our employees.
- Provision of suitable washing facilities, storage space for contaminated PPE and eye-wash in the site emergency medical kit.

Responsible personnel:

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Section 4.

Arrangements

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4.1. Employer-Employee Interaction and Communication:

As stressed in our 'Statement of General Policy' Vincent Callinan Engineering Ltd. views it as our overriding prerogative, in our strategy to eliminate hazards in the workplace, to generate a company ethos of a maximum of communication between management and all employees. We recognise and embrace our duties in this respect as set down in the Safety, Health and Welfare Act 2005.

Regulation 12 of the 'The Safety, Health and Welfare at Work Act 2005, provides a blueprint for communications between employers and employees to help ensure cooperation with a view to protecting the safety and health of the individual in the working environment.

The Safety, Health and Welfare at Work Act, 2005, Section 13 requires that the employer accepts the following responsibilities:

- "to consult employees for the purpose of the making and maintenance of arrangements which will enable employees to co-operate effectively in promoting and developing measures to ensure their safety, health and welfare at work and in ascertaining the effectiveness of such measures."
- "As far as is reasonable practicable, to take account of any representations made by their employees."
- "Employees shall have the right to make representations to and consult their employer on matters of safety, health and welfare in their place of work."
- "Employees may, from time to time, select and appoint from amongst their number at their place of work a representative (in the Act referred to as the Safety Representative) to represent them in consultations pursuant to this section with their employer.

The management of Vincent Callinan Engineering Ltd. acknowledge these responsibilities, and will ensure their implementation.

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4.2. Arrangements:

The variations in working conditions in differing work environments results in the fact that A solution to a hazard for one workplace may not be appropriate for another.

Once the hazards in the workplace have been identified and the risk assessed, the necessary arrangements must be decided and put into effect to protect the safety and health of our-workforce. These include the control measures as outlined in the previous section, such as safeguards e.g. issuing of protective clothing etc. The resources provided by Vincent Callinan Engineering Ltd. to secure the welfare of our employees, will be outlined in this section.

The first step in alerting and preventing possible risk to our employees in the workplace is to point out the general principles of prevention of any such risk to them. These basic tenets of risk prevention are:

- Avoidance of risk
- Extraction or containment of the hazard at source
- Combating the risks at source
- Ventilation of area
- The adaptation of work to the individual, especially the design of places of work, the choice of work equipment and systems of work, with a view in particular to alleviating monotonous work at a predetermined rate and to reducing their effects on health
- Isolation of the process or the worker
- The adaptation of the workplace to technical progress
- The replacement of dangerous articles, substances, or systems of work
- The development of an adequate prevention policy in relation to the SHaW act, which takes account of technology, organisation of work, working conditions, social factors and the influence of factors relating to the working environment
- The giving of priority to collective protective measures over individual protective measures
- The giving of appropriate training, instruction and instruction to employees
- Safeguarding of the machinery
- Ensuring a clean and tidy workplace
- Emergency planning procedures (including first aid)
- Issuing of protective equipment or clothing. An important point to note here is that PPE should be only used in conjunction with other control measures, and when all other methods of containment of the Hazard have been exhausted e.g. In the event if the 'Breaking' of a chemical process pipeline, all valves and pumps should be secured and the line washed before the possible use of PPE is evaluated.
- Regular health checks where appropriate.
- Use of permit to work systems (particularly pertinent in dealing with chemical process production systems).
- Adequate welfare facilities.

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The aforementioned principles of prevention, of risk to employees, are regarded as the benchmark points of security of the employee by the management of Vincent Callinan Engineering Ltd., and as such are strictly adhered to by the company as a whole. We consider it critical that all our employees are made aware of these principles and their importance on joining our company and crucially before the start of any work. These points, and others specified so far, are illustrated to all new employees in the company induction, and are further supplemented by a site induction on the commencement of each new project in order to highlight any risks pertinent to a new working environment. This site induction is carried out, where possible, with the co-operation and input of the Client Safety Officer.

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4.3. Company Induction and Training:

Vincent Callinan Engineering Ltd. acknowledge that , neither new nor existing, employees can be expected to perform their duties safely unless that person has been educated in his or her particular field, and as such is experienced and trained to carry out their tasks. This education may take the form of recognised qualifications, such as being a fully qualified Fitter, Engineer etc. Where an employee lacks such qualifications, training will be provided to ensure the employee's welfare. This involves strict supervision of the employee when undertaking unfamiliar tasks, until such time as he/she is deemed proficient in their duties by a responsible person.

Company Induction:

All Vincent Callinan Engineering Ltd. employees whether experienced or not must undertake a company induction session. This will involve a thorough illustration and explanation of our Safety Statement to the individual, with particular emphasis being placed on points which may be of particular relevance to their needs.

No individual will be permitted to attempt a potentially hazardous activity without proper training and/or supervision. This will be made clear to all new employees and failure to comply with this company directive will be severely dealt with.

Vincent Callinan Engineering Ltd. are committed to identifying the training needs of all our employees and to carry out that training and instruction as appropriate under the Safety, Health and Welfare at Work Act 2005 and the General Application Regulations 2007

Site Induction:

Vincent Callinan Engineering Ltd. recognises the diversity of risk encountered from workplace to workplace. In light of this we deem it necessary to conduct individual 'Site Induction' sessions on commencement of a project in an unfamiliar working environment. Where possible the induction session will be carried out by our Safety Advisor/Officer in conjunction with the client Safety Officer.

Following the induction session, a plant tour will be provided for the employee as a practical illustration of the potential risks and safety protocols of particular interest in the new place of work. The induction to a new worksite therefore consists of the following procedures

- A tour of the work area and grounds giving particular attention to fire and emergency procedures, locations of exits and assembly points.
- The need for a fluid communication process between management and employees will be stressed though-out the tour.
- An instruction on the hazards in the workplace and the preventative measures in force is to be provided on encountering any potential hazards

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on the tour.

• The new employee's responsibilities will be illustrated in their place of operation, allowing a full question and answer session on site.

Toolbox Talks:

Vincent Callinan Engineering Ltd considers these a vital forum in the continuing improvement of our entire employee's standard of work. Regular sessions will be held with attendance being mandatory. Any issues may be raised for discussion by employees and management with a view to improving systems of work, the work environment etc...

Toolbox talks with the client safety officer are welcomed and all employees will attend such meetings, should they be offered.

Records of such meetings will be maintained, including attendance and the topics covered.

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4.4. Organisation

4.4.1. Safety Management System:

Site safety is managed by use of a Site Safety File. The Safety file is prepared from the outset of the project and continued until the project is completed. This file is maintained by the Site foreperson and is updated regularly. It is the duty of the Safety Advisor/ Officer, to inspect the site safety file to ensure that the required registers and documentation are being updated and maintained by the Site foreperson. All Vincent Callinan Engineering Ltd. employees may observe the file on request.

The site safety file is a reference document covering the safety maintenance of the project structure. The file also covers future alterations

The Safety File must contain the following:

- Safety Statement
- general details of construction and materials
- details of equipment and maintenance facilities
- Permits to Work
- Record of Toolbox Talks (with signed attendance sheet)
- details and locations of utilities and services including fire and emergency facilities
- Safety Inspections (by Safety Advisor/ Officer)
- Method Statements and Hazard & Risk Assessments
- Hazard Log and Observation Reports
- Site Safety Performance Records

A Safety File will accompany the Safety Statement on initiation of a Contract.

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4.4.2. Safe Systems of work:

The Safety, Health and Welfare at Work Act, 2005 requires the provision and maintenance of plant and systems of work that are. so far as is reasonably practicable, safe and without risks to health. Vincent Callinan Engineering Ltd. main instrument in complying with these regulations is in the use of 'work permits' issued where any hazard may arise and which ensures a safe system of work. A safe system of work can be defined as "the integration of personnel, articles and substances in a suitable environment and workplace to produce and maintain an acceptable standard of safety. Due consideration must also be given to foreseeable emergencies and the provision of adequate rescue facilities." Safe systems of work are basic to accident prevention and should document all foreseeable hazards fully, any necessary precautions and recommend safe working methods.

The main instances where our personnel perform work with inherent risk requiring the formulation of a safe system of work are:

- Confined Space entry (usually involves entry to an enclosed chemical tank).
- Hot-work procedures in potentially hazardous working environment (e.g. welding where possible combustibles exist)
- Line-breaking of pipe/chemical lines (these lines may be 'charged' with hazardous chemical material.)
- The above procedures will require the implementation of some complementing safe systems of work procedures including: valve lockouts, electrical lockouts and blanking of chemical lines.)

A generic list of procedures to ensure a safe system of work is provided below. This should be utilised to ensure a safe system of work before a specialised system is adopted.

Checklist to Ensure Safe Systems of Work

- Ensure that their responsibilities do not overlap with those of anyone else.
- Ensure that there is not any element of the job overlooked in order to eliminate potential hazards.
- Use relevant codes of practice.
- Eliminate hazards at source before commencing the activity.
- Make sure personal protective clothing is worn and used correctly.
- Ensure all employees have been trained in the proper use and limitation of protective clothing.
- Before commencement of work, check plant and equipment for suitability.
- Assess the consequences if you are wrong.
- Assess how the person in charge will deal with any problems.
- Ensure that all employees are aware of the emergency procedures. Also check that the emergency services could get to the work place in an acceptable time.
- If the job is unfinished at the end of the working day, can it be left in a safe state until the next day?

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Before any system of work can be employed in a workplace access must gained to it in a safe and risk free manner. Some simple guidelines which ensure this and which should always be followed are:

- Limit access, and control movement of unauthorised personnel.
- Holes in floors to be fenced off or covered, with covers marked or secured.
- Fire exits and means of escape in case of fire to be kept free at all times.
- Good standards of housekeeping to be maintained.
- Safe place of work to be provided.
- Where there is a possibility of falling more than 2 metres or falling onto obstructions such as valves, motors etc., edge protection to be provided
- All leads and electrical cables must be laid in a safe manner so as not to obstruct walkways. If possible all leads will be hung at a height exceeding two meters.
 Where this is not possible adequate signs must be posted.

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Controls for Safe Systems of Work:

Permits to work are required for Tasks where the risks are greater than that which would be expected under normal site working conditions.

A permit to work system is a written system of the procedures which must be taken to safeguard the welfare of workers in potentially dangerous areas. It involves mechanical, electrical or process isolation procedures or monitoring the atmosphere for the presence of dangerous fumes. It sets out in a systematic way the work to be done, the hazards involved and the precautions to be taken.

The four instances, as highlighted above, where specialised Safe Systems of Work are required will now be elaborated upon. The management of Vincent Callinan Engineering Ltd. require their personnel to follow the below procedures and any additional ones that the client may specify. All fall under the 'permit to work' Safe-Systems of Work criteria as deemed necessary by the management of Vincent Callinan Engineering Ltd.

Where a Permit to Work system is operated on the site by the client group, the Vincent Callinan Engineering Ltd Foreperson shall ensure that no work is undertaken without first obtaining the relevant Permit to Work and the client authorisation.

1. Confined-space entry.

Entry to confined spaces, e.g. chemical storage tanks, is a common requirement in the maintenance and installation of chemical process systems. Due to possible combustibles (gaseous or solid), the possibility of toxic contamination of the entrée's air supply, and the possible complications of safe egress in the case of an emergency of the entrée it is deemed necessary to have a specific system of work established for the undertaking of this task. The procedure to be followed in the event of a confined space entry is as follows:

- Define confined spaces possible danger of toxic, flammable or oxygen-deficient atmospheres. (These will often be specified by the client in posted form but where any employee feels unsure as to the nature of a working environment or vessel he/she must seek advice from the site foreperson. All spaces should be checked by the site foreperson and safety officer before the commencement of work on the site.)
- Confined space entry permit to be operated.
- A method statement must be completed for carrying out the tank-entry
- Prior to entry, test for gas/fumes/chemical deposits/oxygen deficiency by a competent individual with a record of the individual's signature being recorded on the work permit. Continuous monitoring at workplace is then to be undertaken.
- The confined space should be purged with a constant air supply where possible.
- There must be an emergency air supply readily available at place of work.
- An appropriate fire retardant must be readily available at place of work.
- Work to be carried out by competent, experienced employees only.
- Appropriate personal protective and rescue equipment must be provided and employees trained in its use.

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- Appropriate rescue personnel and equipment provided and in attendance.
- appropriate winch must be installed which can easily allow any individual to extract another in case of a medical emergency)
- Steps taken to prevent ingress of hazardous materials (in the case of a chemical tank all lines to the tank must be blanked with PTFE 'spades' and be locked at both pump and valve level)
- Any additional requirements of the client must be strictly adhered to.

Vincent Callinan Engineering Ltd recognises the essential need for a premium of communication between client management/personnel and our management/personnel in the event of a tank-entry.

2. 'Hot-work' procedures:

Hot-work describes any method of work where sparks are produced. It includes welding, grinding, drilling, use of an oxy-acetylene torch etc. Such sparks can be of extreme danger in a work environment where combustibles or explosive materials are prevalent. The steps involved in such a permit system are:

- Assessing of risk of sparks in an area (this should be completed, where possible, with the co-operation of client production manager or competent person in the combustibility of chemicals on the premises).
- Assessment of whether sparks can travel by wind vector to other areas of possible risk (shielding may be necessary).
- Completion of an appropriate Hot-work permit.

3. Line-breaking of chemical lines :

Such lines may be 'charged' with hazardous chemical material. The procedure for such work, in chronological order, is:

- Identification of contents and direction of flow of pipe.
- Identification of pump pressurising line.
- Dressing in appropriate PPE ('Slicker Suit', face shield and rubber gloves.)
- Draining and washing of line.
- Acquisition of 'line-breaking permit' and 'electrical lockout' for the pump.
- Locking out of pump.
- Identification of required valve lockout positions.
- Acquisition of valve lockout permits
- Isolation of length of pipe to be broken.
- Breaking of Pipe.
- On completion of task client personnel must be informed of position of all valves

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new or old.

It is imperative that client personnel are fully informed of any changes which have been effected on the system and they are made aware that responsibility for the system is now back under their control on signing off of the 'line- breaking permit'.

4.5. Reporting of Accidents

Vincent Callinan Engineering Ltd. is obliged under the Safety, Health and Welfare Act 2005, and the General Applications Regulations, 2007, to report all accidents and incidents that occur on site.

An accident can be defined as: "an unexpected, unplanned event in a sequence of events, that occurs through a combination of causes; it results in physical harm to an individual, damage to property, a near-miss, a loss or any combination of these effects."

Accident Reporting Procedure:

An employee who is involved in an accident will report it to the site Foreperson, who will after any concerns for the individual's health have been addressed, complete an accident/incident report (as specified in the accident report format contained in the site safety file). On completion of this document it is incumbent on management to alter the safety Statement as necessary to ensure avoidance of a similar accident in the future

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4.6. First-Aid Treatment

First-aid facilities and trained personnel will be made available at the Clients request in accordance with the Safety, Health and Welfare at Work Act 2005 and the General Applications Regulations, 2007.

Guidelines for Personnel on First-Aid Treatment: (where requested)

- All injuries must be reported immediately, no matter how minor, to the Site foreperson and first-aid. Should later medical care be required, you will have fulfilled your obligations.
- You must notify your Site foreperson and First-Aid prior to leaving the workplace of injury or illness, whether personal or work-related.
- Prior to return to work after a disabling injury or illness, you must present a medical clearance certificate from the attending physician and present it to the Site foreperson.
- If you have a physical handicap, such as diabetes, impaired vision or hearing, back or heart trouble, hernia, you must inform the Site foreperson. You will not be expected to do a job which might result in injury or harm to yourself or others.
- If you have had first-aid or fire-fighting training, tell your Safety Representative, you may be invited to join the Companies first-aid or fire fighting team.
- Never move an injured or seriously ill person unless it is necessary to prevent further injury.

Regardless of the level of intensity of first-aid required, the person providing first-aid assistance is required to:

- Give immediate and reasonable treatment, bearing in mind that a casualty may have more than one injury and that some casualties will require more urgent attention than others.
- Be fully conversant with first-aid procedures dealing with construction injuries.
- Understand the requirements of first-aid boxes and maintain all stocks applicable to the work place.
- As a minimum requirement hold an Occupational First Aid certificate, not older than 2 years.
- Be available at all times as required by legislation.
- Offer advice to all other employees regarding first-aid.

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4.7. Emergency Procedure

When an emergency alarm is sounded it is the duty of any employee, irrespective of rank, to take responsible action in response to an emergency:

- Sources of combustion to be turned off (vehicles, motorised equipment, electrical apparatus, open flames, etc.)
- All persons to leave the site and go to their designated area.
- Site Foreperson to quickly check, if time allows, that areas or buildings under their control are evacuated as they make their escape.
- At the assembly area checklists must be prepared by the Site foreperson/Client to ensure that all persons are accounted for.
- Unaccounted for personnel shall be reported to the Safety Officer or the appropriate ERT Leader or the appropriate person identified at the site induction.

All personnel shall remain in their designated area until the all-clear has been sounded. It is then the duty of the site foreperson and safety officer to assess the response of Vincent Callinan Engineering Ltd. employees to the emergency and to address any shortcomings where appropriate.