

Commtech Ltd

HEALTH, SAFETY & ENVIRONMENT POLICY

1. Managing Directors introduction

This policy on health, safety and the environment is one of a series of governance policies that are implemented throughout the Company to underpin Commtech values.

Commtech operates nationally and has a wide range of business activities in different customer locations. As a result we have people working in diverse occupations, including: building maintenance, Commissioning, commissioning management, and office-based roles.

The health, safety and welfare of all our employees and those that may be affected by our operations are of paramount importance to the Company. Similarly, minimising our impact on the local and wider environment is a core business issue.

The Board of Commtech Ltd has endorsed this policy and requires all Commtech management and employees to comply with it. The management are responsible for the detailed oversight of the operation of the policy and reports to the Board as and when appropriate matters arise with an annual review. More specifically, the Managing Director is the Board Member responsible for Health, Safety and Environmental matters.

2. Policy objectives

- Promote local accountability for implementation of, and adherence to, this policy across the business.
- Incorporate health, safety and environmental considerations into all of our business activities
- Continually strive to ensure that the health, safety and environmental impacts of our processes and services are reduced to a minimum
- Communicate effectively with all of our employees to improve performance and ensure understanding of responsibilities
- Work with our customers and suppliers to achieve improved performance on shared issues
- Report appropriate performance information publicly on a regular basis

3. Policy commitments

Commtech policy is to minimise risk for our people, the environment, adjacent communities and other stakeholders through the promotion of a strong culture of health and safety and of environmental protection. As a result, we are committed to effective communication and consultation on health, safety and environmental matters with all relevant stakeholders.

Health, safety and environmental awareness is not only the responsibility of management, it is a responsibility that all employees must share. Contractors and suppliers are also expected to maintain high standards of responsible care for these issues.

In particular, Commtech expects those working for us directly, and on our behalf, to: work safely, act responsibly, adhere to health, safety and environmental rules and procedures, use protective equipment where necessary and generally contribute to the maintenance of safe and healthy conditions.

In support of these general commitments, Commtech requires manage its activities to ensure that, so far as is reasonably practicable, we will:

- meet or exceed legislation in all parts of the country where we operate and have appropriate communications with relevant regulatory authorities, trade associations and industry bodies
- take into account prevailing understanding of our industrial operations and associated hazards to provide safe working conditions and to prevent pollution

- further augment our risk management approach by monitoring near misses, investigating root causes and ensuring that any such hazards are minimised and seeking other ways to reduce the number and severity of personal accidents and environmental incidents
- search for opportunities arising from health, safety and environmental improvements in processes and services that also have wider business benefits, such as maximising energy and other resource-use efficiency.
- continually improve our management and performance in these areas through the setting of objectives, targets and plans; investing in techniques and technology as appropriate
- facilitate co-operation, education and training to maximise the contribution of all employees to the achievement of high standards in health, safety and environmental matters
- exercise due diligence in relation to health, safety and environmental issues during corporate transactions
- require contractors and other visitors to comply with all relevant health, safety and environmental requirements when on Company business.

4. Reporting of breaches and accountability

Any employee who becomes aware of any existing or potential breach of this policy is required to notify the Head of HSE Management promptly. If preferred, concerns may be reported in accordance with the Company's Whistleblowing Policy.

In enforcing the policy, the Company will take or authorise such disciplinary action as it deems appropriate up to and including dismissal of the individual(s) responsible.

5. Enquiries

All enquiries in relation to this policy or its applicability to particular situations should be addressed to the Head of Group Risk Management.

Signed by:



S. Hawkins, Managing Director
on behalf of Commtech Ltd
Dated: 07 June 2007