

FENNER GROUP HEALTH AND SAFETY POLICY

1. The Group is absolutely committed to ensuring that all employees can work safely at all times. This overriding commitment to provide a safe and secure working environment extends to those employees of other companies working on our behalf, as well as customers, visitors and neighbours who maybe affected by our activities.
2. Management of health and safety is integral to the Group's corporate business strategy and is the first priority for all employees. The Group will always endeavour to set the highest practical standards in health and safety and will always comply with its statutory obligations.
3. At Board level, the Chief Executive Officer has specific responsibility for development of policy and management systems. Responsibility for health & safety matters in each Operating Division is delegated via the Divisional Managing Director to the senior manager at each Operating Site. Each Divisional Managing Director will be required to provide assurance to the Board on a regular basis and to advise the Board immediately of any health & safety risks or other incidents likely to be significant to the business.
4. Each Business Unit will fully conform to the legal and regulatory requirements of the governmental authorities in the countries in which its Operations and activities are conducted.
5. A set of minimum health and safety expectations – collectively known as the Health and Safety Management System Framework (The Framework) - have been defined at the Group level and will cover:
 - 1) Accountability & Leadership;
 - 2) Risk Assessment & Management;
 - 3) Training & Behaviours;
 - 4) Operations and Maintenance;
 - 5) Information & Documentation;
 - 6) Customers & Products;
 - 7) Incident Analysis & Prevention;
 - 8) Assessment, Assurance and Improvement;
 - 9) Crisis Management and Business Continuity Planning;
 - 10) Management of Change;
 - 11) Working with Third Parties;
 - 12) Design and Construction of Facilities; and
 - 13) Community & Stakeholder awareness.
6. Each Operating Site will ensure their own HSE management system is consistent with the expectations laid out in The Framework. Responsibility for delivering The Framework expectations will be delegated to the Divisional Managing Directors and through them to the Business Unit level.
7. The Group will support and make available all necessary assistance to enable the Division and Business Units to achieve the policy commitments and strive to ensure continual improvement in the standards of health and safety being achieved.
8. All employees are reminded that their first responsibility is for the health and safety of themselves and others. All employees are empowered to reasonably challenge, up to and including halting work that they consider to be unsafe for themselves or others. Such a challenge will require a timely and suitable response from local management to assess and address the root causes of the raised issues.
9. For the avoidance of doubt this policy set out as a minimum for all those working at or away from the Group's locations to:
 - 1) Fully comply with all the requirements of the local Fenner HSE management system;
 - 2) Promptly report to local Fenner Management all accidents, injuries, illness, near-misses and any unsafe or unhealthy conditions or incidents.Failure to act in accordance with these minimum requirements can lead to disciplinary action.
10. This policy will be subject to review to evaluate its effectiveness at least annually and/or arising from significant changes in the business, legislation or standards.

M S Abrahams
Chief Executive Officer
Fenner PLC
6th November 2009

