



**COMPANY ENVIRONMENT HEALTH
and SAFETY POLICY**

June 2008

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This policy document is supported by, and must be read in conjunction with, the detailed Environment Health and Safety Programme Management Manual and the Otis Group Employee and Contractor Safety Handbook which details the Company's safe working procedures.



Otis

A United Technologies Company



OUR EH&S VISION

We will be the recognised leader in EH&S excellence – not just in our industry, but all industries worldwide. We will not be satisfied until our workplace is free from hazards, our employees are injury free, our products and services set the standard for safety, and our commitment and record in protecting the natural environment are unmatched.

OUR EH&S VALUES

PEOPLE

We actively champion safe behaviors of our people.

- No job or activity is worth risking injury.
- All injuries, illnesses and environmental incidents are preventable.
- Every one of us should return home at the end of every workday in the same condition we arrived.

COMPLIANCE

We practice and promote safe and environmentally sound practices around the world.

- We comply with all EH&S laws worldwide.
- We design and integrate environmental and health and safety into our products, facilities and management systems.

RESPONSIBILITY

We are all accountable for keeping people and places safe.

- Each of us is responsible for our own safe behaviors and those of our co-workers.
- Each of us is empowered to take any action necessary to eliminate the potential of an injury or environmental incident.
- EH&S is led by senior management and implemented by line management, with each level accountable to the one above and responsible for the one below.

UNDERSTANDING

We design work processes that allow us to perform our jobs in the safest way possible, while delivering the highest quality products and services to our customers.

- We provide all Otis employees with the necessary knowledge, skills and abilities to work safely.
- We consider EH&S in every decision we make and in every activity we perform.
- We relentlessly focus on improving our EH&S processes.

Otis UK & Ireland Managing Director
UCEA President

Director of Zone Operations

Managing Director PDERS Key Lifts



1.0 POLICY AND LEADERSHIP

The Directors of Otis Limited recognise and accept their responsibility for ensuring that the company's activities do not endanger the health and safety of employees, sub-contractors and others including members of the public who come into contact with the company's activities and products. The Directors are equally committed to protecting the environment.

The Directors manage Environment, Health and Safety throughout the organisation in accordance with the twelve Environment, Health and Safety Elements detailed in the company's EH&S Management Programme Manual. The requirements of these twelve Environment, Health and Safety Management Elements are summarised to form this Company's Environment, Health and Safety Policy document, which includes the Company's Environment, Health and Safety Policy Statement, signed by the UK and Ireland Managing Director. In addition an Employee and Contractor Safety Handbook is issued to employees and contractors. This handbook is subject to review on a regular basis. To support the Company's Environment Health and Safety Programme, in addition to the completion of risk assessments, documented safe working methods are increasingly prepared to detail how particular tasks are to be completed in a safe manner.

Effective and sustained leadership from senior management is recognised as being vital to achieving environment, health and safety excellence. Management leadership lays the foundation upon which a solid programme is built.

All managers are expected to personally demonstrate and emphasise the importance and meaning of environment, health and safety protection throughout their area of responsibility. This approach is built into their day-to-day management and decision making processes within their area of influence. It is not purely limited to activities that have direct risks to health and safety, e.g. field activities, but also to other activities of the business such as engineering design, purchasing, contracting, marketing, sales, etc.

Our Policy Statement reflects management commitment to safeguarding the health and safety of its employees and users, protecting the natural environment and complying with all applicable legislation

The Policy Statement is kept up to date and signed by the Managing Director and the Appropriate Operations Director.

The Policy Statement is communicated as follows:

- Contained in the Employee / Contractor Safety Handbook distributed to all employees.
- Posted at various locations.
- Used in newsletters, handbooks, manuals, etc.
- Incorporated into training courses.

Managers are required to demonstrate their personal involvement in achieving environmental health and safety excellence. For example: personal participation is required in programme elements such as training, communications, inspections, audits, investigations and general activities.

In support of this commitment, Management Environment, Health & Safety Cardinal Rules have been issued and all levels of management are required to comply with these at all times.

The furtherance of this basic policy of maintaining a safe work place and safe systems of work is the responsibility of each employee, inclusive of the Managing Director and other members of the Executive Board. Environment, health and safety programmes are designed with the purpose of establishing safe working conditions and compliance with all the relevant legislation particularly the Health & Safety at Work Act 1974 and current regulations. Environmental programmes are designed to reflect best practice and to ensure compliance with the all relevant legislation particularly the Environmental Protection Act 1990. All employees are expected to follow the working procedures and advice detailed in the Otis Employee & Contractor Safety Handbook and Otis Safety and Environment Rules. In addition all employees are expected to respond to training programmes and implement the lessons learnt.

Management is held accountable for implementing the safety programmes outlined by the Company. The success of the environment health and safety programme is based upon a co-operative effort and open communication between managers and employees.

It is our continuing practice to:

- Comply in a prudent manner with all applicable environmental, health and safety legislation.
- Inform and educate employees about the recognised hazards of their work place and their duties under the legislation and company standards: uniformly enforcing compliance.
- Carry out comprehensive self-inspection and audit programmes addressing environment, health and safety issues, and comprehensive accident investigations, recording findings and ensuring that corrective actions are completed.
- Where necessary, establish environmental, health and safety instructions which exceed the legal requirements as needed to ensure the well being of our employees, and others.
- Encourage employees to bring potentially unsafe conditions and practices to the attention of management by providing them with prompt responses to their concerns when these are judged to be warranted.
- Require the management of all facilities to adhere to and disseminate throughout their organisation the policy as detailed in the Environment, Health and Safety Management Manual, and to follow procedures established for the implementation of this policy.

1.1 **CARDINAL SAFETY AND ENVIRONMENT RULES** (See also Section 8 - Rules & Procedures)

The following Cardinal Safety and Environment Rules have been established and are enforced.

MANAGEMENT CARDINAL RULES

The Company through its managers is totally committed to providing safe working conditions and practices for all of our employees. All managers are expected to lead by example at all times and in accordance with the Company's and clients safety rules (including conducting unannounced FPA's).

Failure to observe these rules may result in disciplinary action, up to and including dismissal.

- **NEVER** ask anyone to perform an unsafe act.
- **ALWAYS** take all reasonable steps to correct any known unsafe conditions before allowing personnel to operate.
- **ALWAYS** ensure that all personnel are equipped with all required personal protective equipment.
- **ALWAYS** ensure that all personnel have proper safety training to do the assigned task.
- **ALWAYS** ensure that all personnel achieve safety certification each year.
- **ALWAYS** ensure that all personnel and contractors adhere to the established Safety Rules and Absolutes.
- **ALWAYS** demonstrate full knowledge of WWJSSS.
- **ALWAYS** administer discipline in a positive, fair and consistent fashion.
- **ALWAYS** personally adhere to established Safety Rules.
- **ALWAYS** actively demonstrate an attitude of Safety First.

These Management Cardinal Rules and the additional Field, Escalator/Trav-o-lator and Workshop/Factory Cardinal Rules and their applications can be found in the Employee / Contractor's Safety Handbook.

Managers have a responsibility to ensure they follow up and close off all reported accidents, hazardous incidents or near hit situations.

DON'T FORGET

- Managers will never look the other way.

The company is totally committed to safe working practices. All employees are expected to work in a safe manner at all times and in accordance with the Company and clients' safety rules (including participation in the FPA process).

These cardinal rules along with the detailed application can be found in the Employee and Contractor's Safety Handbook.

Failure to observe these rules may result in disciplinary action, up to and including dismissal.

DON'T FORGET

Report all accidents, hazardous incidents, near hits, or unsafe working conditions.

FIELD CARDINAL RULES

- **ALWAYS** assure protection from falling where a fall hazard exists.
- **ALWAYS** maintain control of the elevator when accessing/egressing and working in the pit or hoistway.
- **ALWAYS** follow the operations authorized control procedures for hoisting and rigging and mechanical blocking of elevator equipment.
- **ALWAYS** ensure any lift running platform or false car on which work is carried out within the shaft has effective safety gear/devices, along with an audio-visual alarm.
- **ALWAYS** protect open lift shafts and access to escalators (Escalator Cardinal Rules) in an approved fashion.
- **ALWAYS** use only company issued/defined shorting wires and their use shall be in accordance with Company Safety Procedures.
- **ALWAYS** follow the lock and tag out procedures whenever power is not required for the work activity (LOTO).
- **ALWAYS** maintain control of the elevator when accessing/egressing and working on the car top.
- **NEVER** modify control circuits without Engineering Department approval/diagrams, all changes must be marked on drawings.
- **NEVER** ride the car top with the elevator on normal operation.
- **NEVER** work or position body parts in proximity to unguarded moving parts or electrical circuits.

ESCALATOR, TRAV-O-LATOR AND MOVING WALKWAY CARDINAL RULES

- **ALWAYS** use effective barriers and warnings and block the unit electrically and mechanically when leaving the unit unattended with steps/pallets removed.
- **ALWAYS** ensure a Zero Energy State and lock and tag equipment before working on or coming in proximity to unguarded electrical circuits.
- **ALWAYS** use inspection controls or key controls, to operate or move the step chain for all work activities.
- **ALWAYS** mechanically secure the escalator from movement prior to working in the truss by two independent means.
- **ALWAYS** assure protection from falling when a fall hazard exists.
- **ALWAYS** verify the proper functioning of the Emergency Stop Switch prior to entering the Machine Room or the Pit/Tank.
- **NEVER** ride the escalator/moving walkway with the steps/pallets removed.
- **NEVER** walk on the step axles.
- **NEVER** work or position body parts in proximity to moving parts of the unit.

FACTORY/WORKSHOP CARDINAL RULES

- **ALWAYS** wear appropriate safety glasses as required by location or activity, as identified through risk assessment.
- **ALWAYS** wear appropriate gloves while handling materials/components.
- **ALWAYS** assure protection from falling where a hazard exists.
- **ALWAYS** lock and tag out equipment whenever power is not required for the work activity.
- **ALWAYS** wear appropriate safety footwear as required by location or activity, as identified through risk assessment.
- **ALWAYS** use certified hoisting and rigging equipment within its safe working limits.
- **ALWAYS** work in accordance with the operation's authorised procedures.

- **NEVER** operate machinery or equipment without guarding and controls in proper working condition.
- **NEVER** use materials/substances unless they are approved and the supporting COSHH risk assessments have been completed.
- **NEVER** use overhead cranes or forklifts / powered industrial vehicles unless qualified and certified.

The rules have been established in order to maintain a safe work environment, and it is necessary for all managers and employees to understand and follow all these rules and all other safety instructions at all times. Where there may be a conflict between the rules and operating requirements then the rules must be followed. Any such conflicts must be referred to senior management.

1.2 OTIS SAFETY DISCIPLINE PROCEDURE FOR ALL EMPLOYEES

Breaches of Safety Rules and procedures are addressed through the Company's established Disciplinary Procedure. Management are required to consider the seriousness of the violation(s) to help determine what disciplinary action to take. In order to ensure the consistency of application of the disciplinary action where any doubt exists it is recommended that the relevant Company Human Resources Manager is contacted for advice in advance of either a suspension or discharge.

The levels of disciplinary action are:

- Formal Verbal Warning
- Written Warning
- Final Written Warning
- Dismissal With Notice
- Summary Dismissal

2.0 ORGANISATION AND OVERSIGHT

The responsibility for the administration and execution of the management of environment, health and safety is deemed to be a line management function. Active participation in the programme at all levels of the organisation is absolutely essential if the Company's objectives are to be met. The Environment, Health and Safety Management System as detailed in the Otis Environment, Health and Safety Management Manual is formally organised at local level to achieve maximum effectiveness. This organisation entails an understanding of Environment, Health and Safety roles and responsibilities including appropriate technical staffing, as well as a capability to provide overall strategic direction and support to the Company's Environment, Health and Safety efforts.

A structure of Environment, Health and Safety Committees is established consisting of Regional and National Safety Committees which includes Managers and Safety Representatives appointed by their colleagues.

- A senior manager chairs each committee.
- The committees have formal charters.
- Meetings are formally scheduled.
- Meeting minutes are documented and distributed.

A Weekly Management Safety Review, comprising of members of the Executive, is held to review and consider the results of investigations into Reportable Incidents and Near Hits and to consider any urgent safety related matters, on order to guide and agree corrective actions.

This Review is also focused in terms of providing overall strategic direction and support to company-wide prevention efforts including financial and human resources.

In addition a structure of communicating Environment, Health and Safety topics is established to provide greater attention to local issues and individual topics.

The Group Environment, Health and Safety Manager together with other safety technical staff support the company Environment, Health and Safety Committees.

TECHNICAL STAFFING

The Group Environment, Health and Safety Manager, who reports to the Managing Director, and has immediate access to senior management, ensures that the company has sufficient number of Environment, Health and Safety personnel to support line management. Also that Environment, Health and Safety personnel possess sufficient technical skills and training to consult and advise management on appropriate prevention and control strategies. Regional Safety Managers have been appointed to support all Regions/Locations with their Environment, Health and Safety programme.

2.1 TERMS OF REFERENCE OF ENVIRONMENT, HEALTH AND SAFETY COMMITTEES

The following Charters have been agreed.

MANAGEMENT WEEKLY MEETING SAFETY REVIEW

Frequency: Meetings will be conducted on a weekly basis.

Terms of Reference:

In addition to discussing other major related topics the meetings discuss and record all safety related incidents that have occurred during the previous week and review any open incidents. This includes serious Near Hits, accidents, lost time or otherwise, corrective actions and any disciplinary action associated with safety violations.

As determined by the Review, the responsible Supervisor/Manager reports on Serious Incidents, Near Hits or Dangerous Occurrences

The Review also oversees the overall Environment, Health & Safety Management System and various departmental action plans.

NATIONAL ENVIRONMENT, HEALTH & SAFETY COMMITTEE.

Frequency: Meetings will be every three months.

Terms of Reference:

To exchange information to ensure the ongoing improvement in environment, health & safety management throughout the company.

To discuss environment, health and safety matters in order to provide input into Company policies and Rules.

To identify environment, health and safety issues which require resolution and possible policy decisions at a higher level.

To consider recent accidents and notified diseases in order to identify implications within the Group (and where applicable the Industry) so that action can be taken to eliminate similar events in the future.

To consult Union Appointed Safety Representatives on topics of national significance.

To recommend actions to Executive.

Identify topics requiring Environment, Health and Safety improvements.

Assist in the implementation of Company Environment, Health and Safety Action Plans

Monitor and progress company compliance with applicable legislation, company rules and procedures.

REGIONAL ENVIRONMENT, HEALTH & SAFETY COMMITTEES.

Frequency: Meetings will be every three months.

Terms of Reference:

The object of every Environment, Health & Safety Committee is to ensure co-operation of all employees in the promotion of environment, health and safety matters by all possible means.

To discuss and resolve local environment, health and safety matters in a prompt manner in accordance with established Company policies.

To identify environment, health and safety issues which require resolution and possibly policy decisions at higher level.

To consider recent accidents and notified diseases in order to identify implications within the region so that action is taken to eliminate similar events in the future.

To consult Union Appointed Safety Representatives.

To assist in the implementation of Company Environment, Health and Safety Action Plans.

3.0 ANNUAL PLANNING

It is recognised that advancement of environment, health and safety performance is achieved by constant and on-going planning and measurement of improvement.

Written goals, objectives and action plans based on the Company's current performance and management systems with respect to environment, health and safety will be prepared annually. The Plans are approved by the Executive.

Performance means not only numerical goals but more importantly the implementation of activities, programmes and development of internal controls necessary to achieve those goals. The plan is based on an analysis of past performance such as accident trends, regulatory requirements, corporate expectations, achievement of Otis standards etc. Consideration is also to be given to suggestions made by the Regional and National Environment, Health and Safety Committees according to an established timetable.

The Executive sets targets for the Plan Metrics including the reduction of Lost Time Accidents, Incident and Severity Rates, and the reduction in total accidents. The metrics also include Environment reduction targets, Public Accidents and Motor Vehicle Accidents. The actions / objectives agreed by the Executive forms the basis for the company's Annual Plan. The plan is in writing and clearly defines responsibility and accountability for completion. The completion of the plan is monitored by the Environment, Health and Safety Department and reported to the Executive meeting.

4.0 ACCOUNTABILITY

The Company management teams accountable for meeting the business plans are also responsible for the development and implementation of environment, health and safety management systems. Authority is delegated throughout the organisation to carry out these responsibilities.

Managers and supervisors at all levels of the organisation are held responsible and accountable for Environment, Health & Safety performance.

RESPONSIBILITY AND AUTHORITY

Each manager with responsibility for and authority over other employee's, is accountable for assuring the implementation of effective safety and environmental systems and acceptable performance at every level of the organisation for which he/she is responsible.

This accountability is integrated into the individual and company objective setting and performance

appraisal processes.

Environment, health & safety performance measurement is taken into account in pay for performance accountability systems; specifically incentive and bonus schemes, and individual awards or other means of compensation including progression.

DELEGATION OF RESPONSIBILITY

In field locations, the responsibility for implementation of the environment, health and safety programme lies with the Regional Directors through the appropriate personnel in the Region's Management team.

The Company's Safety Programmes are designed for the purpose of establishing safe working conditions and compliance with legislation. All employees are expected to follow safe working procedures and safety rules. The maintenance of a safe work place is the responsibility of each employee. In addition all employees are expected to respond to training programmes. Supervision is held accountable for implementing environment, health and safety programmes outlined by the Company. The success of these programmes is based upon a co-operative effort and open communication between management and all employees.

In order to achieve the stated objectives the programme is implemented in accordance with the Company Environment, Health & Safety Management Manual. Full details of the control measures to be operated are given in the Otis Employee & Contractor Safety Handbook.

4.1 ENVIRONMENT, HEALTH & SAFETY RESPONSIBILITIES

All employees of Otis Limited and its subsidiaries are required to adhere to the appropriate Company rules, procedures and the contents of the Otis Employee & Contractor Safety Handbook. Management are also responsible for ensuring that the requirements of the Otis Environment Health and Safety Management Manual are met within their area of responsibility.

In addition the following employees have special responsibilities.

Managing Director

Under the direction of the Managing Director, the Otis UK Management Team will be responsible for ensuring compliance with the Company Environment, Health and Safety policies and statutory requirements.

Executive Directors

Are responsible for collectively providing leadership and for ensuring compliance to the Company Environment, Health and Safety policies and statutory requirements within their area of responsibility. They will conduct audits to monitor compliance with the required company standards.

Regional Directors

Are responsible for collectively providing leadership and for ensuring compliance to the Company Environment, Health and Safety policies and statutory requirements within their area of responsibility. They will conduct audits on their direct reports to monitor compliance with the required company standards.

Environment, Health and Safety Managers

Are responsible for updating and revising the Company Environment, Health and Safety policies, revising and helping establish new policies and procedures in the light of any new legislation or knowledge.

In addition they are responsible for: -

Maintaining accident and dangerous occurrence records, analysing, and in serious cases assisting in, the investigation of accidents and dangerous occurrences.

Promoting Environment, Health and Safety awareness through the various channels of communication within Otis.

Assisting Directors, Managers, and Supervisors to meet their various responsibilities for environment, health and safety.

Conducting audits throughout the Group to ensure that all Otis employees are carrying out the Company's environment, health and safety procedures in line with the Environment, Health and Safety Management System.

Purchasing Manager

Is responsible for ensuring goods, services [including contractors] and new equipment supplied to the Company comply with Otis Environment, Health and Safety requirements. This includes the provision of sufficient information by suppliers to ensure that any risks or hazards associated with their products can be assessed. All companies detailed in the Otis Preferred Vendors Listings must comply with Otis environment, health and safety requirements

Training Manager

Is responsible for providing a training service in conjunction with the Environment, Health and Safety Department to Supervisors and Managers on environment, health and safety matters in the form of in-house and public courses, distance learning packages and bulletins, etc. Responsible for ensuring general induction training is provided for all personnel together with on-going training for field Otis personnel and Contractors.

Sales Managers

Are responsible for the provision of information to the customer of Company Environment, Health and Safety Information and for ensuring that Environment, Health and Safety requirements are taken into account at the tendering and negotiation stages of contracts. This applies, as far as reasonably foreseeable, both to equipment selection and in terms of ensuring the health and safety of employees and others during the subsequent contract. This is especially important during lift refurbishment, modernisation and repairs but also applies to maintenance contracts and ensuring that the requirements of Section 5.3.2 of the EH&S Management Manual - Risk Assessment Pre-maintenance are completed.

They are responsible for ensuring that where new equipment is varied and / or does not meet the requirements of EN81 or Otis WWJSSS standards that they liaise with Technical Support to ensure that a documented risk assessment is completed and the required approval is gained.

Engineering Managers

Are responsible for ensuring, as far as reasonably practicable, that the products of the Company are designed in such a way that they do not pose a risk to the environment or to the health and safety of employees or the public. They must ensure compliance with European and British Standards and other recognised safety standards and recommendations, and advise on the modification of the product design where necessary in light of hazard reports received.

All Managers and Supervisors

Are charged with working in accordance to the Management Safety and Environment Cardinal Rules as detailed in Section 1 of this Policy.

They are responsible for the promotion and awareness of health and safety at work to all employees under their control and for ensuring the employees are adhering to Environment, Health and Safety Policies, Rules and Procedures and statutory requirements and in particular for ensuring that: -

All employees under their responsibility are properly trained and their knowledge is kept up to date by regular Training Sessions.

New employees are instructed through the Company's Safety Induction Procedures.

Suitable risk assessments are carried out using the Otis Risk Assessment Documents.

Action is taken where medium and high risks have been identified and that all necessary control measures and precautions have been established and maintained.

Safe working methods and procedures are established and maintained thereby protecting the environment, and the health and safety of persons in their charge and others.

All portable electrical appliances and lifting devices are examined / tested at the prescribed time in line with Company Policy and that records maintained.

Accident investigations are carried out and reported in line with the Company Procedures.

Site / Workplace Safety Inspections are conducted to ensure that all employees and contractors are observing the Company safety requirements and that action is taken to correct any failings identified.

Employees in their care are provided with and wear suitable protective equipment as prescribed by the company.

The precautions are operated so that any material or substance used does not create risk to the environment, health and safety.

Waste materials are disposed of correctly by using approved and licensed disposal contractors.

All Contractors who work on Otis sites receive, understand and adhere to the Otis Employee & Contractor Safety Handbook.

Initial Site Safety Inspections are carried out before commencement of Modernisation / Construction work and liaising with the client/main contractor or site agent to accomplish safe working conditions on site.

All Field Operations Department Managers

In conjunction with the Environment, Health and Safety Department, they will assist in establishing, revising safe working practices within the Company, and where necessary ensuring modifications to the product in the light of any hazardous reports received.

They will be responsible for ensuring, so far as reasonably practicable, that the design of the Company's product does not create a risk to the health & safety of Otis employees or members of the public

Safety Representatives

Will co-operate effectively in promoting and developing environment, health and safety matters.

Represent employees in consultation with management over environment, health & safety matters.

Carry out self-inspections on behalf of their colleagues, reporting unsafe and hazardous conditions to the relevant Supervisor / Manager.

Participate in Accident and Dangerous Occurrence investigations and record their observations at the Environment Health and Safety Committee Meetings.

Principal Engineers/Chargehands

Ensure the health & safety of themselves and persons in their charge.

Give assistance to Supervisors / Managers in carrying out safety training to new employees.

Assist Supervisor / Managers in carrying out Environment, Health and Safety Responsibilities.

Service Engineers

Ensure the Health & Safety of themselves and persons in their charge.

Responsible for carrying out Site Safety Risk Assessments, ensuring that unsafe and hazardous conditions are reported to their Supervisor / Manager.

Assist in the safety training of new employees.

Ensuring that all waste materials are disposed of correctly by using approved and licensed disposal contractors.

Construction/Modernisation Engineers

Ensure the health & safety of themselves and persons in their charge.

Assist in the safety training of new employees.

Carry out Site Safety Assessments where they are in charge and liaising with the site agent to accomplish safe working conditions on site.

Ensure that all waste materials are disposed of correctly by using approved and licensed disposal sites.

All Employees

Ensure the health and safety of themselves and others including members of the public who may come into contact with their work activities.

Adhere to Environment, Health and Safety Policies, Rules and Procedures.

Report accidents, near hits, dangerous occurrences and unsafe conditions promptly to their Supervisor.

Proper use and care of all Personal Protective Equipment supplied by the Company.

4.2 MANAGEMENT OF CONTRACTORS / SUB-CONTRACTORS

All contractors on Otis premises or its customers' premises are required to work to Otis standards. All risks associated with the activities of any contractor in carrying out work for Otis must be controlled. It is the responsibility of the Otis Contract Co-ordinator, who is deemed to be the person in Otis who has the responsibility for the work, to ensure that this is achieved.

An overview, detailed in appendix D of the Otis Environment, Health and Safety Management Manual, must be followed to ensure that all contractors conducting work on behalf of Otis on client's sites do so in accordance with the Otis Environment, Health and Safety Policy requirements.

5.0 ASSESSMENT, PREVENTION AND CONTROL

The Company has developed and implemented a structured approach for identifying potential hazards and associated risks in each aspect of the business. Prevention and control strategies are implemented to eliminate or control identified hazards and associated risks. Details of the control measures are contained in the Otis Employee & Contractor Safety Handbook - (see Appendix A).

Established procedures are in place to assess, prevent, control and provide ongoing surveillance of all operations in terms of Environment, Health & Safety activities.

In particular : -

- The responsibility for the assessment, prevention and control function is formally assigned.
- All potential hazards and risks are required to be identified.
- The identification process incorporates the results of incident investigations, site inspections, Job Hazard Analysis, analysis of regulatory requirements and Company standards.
- Environment, health and safety site assessments are performed and incorporated into the business evaluation of any potential acquisition, divestiture, joint venture, or leasing of real property.
- Risk Assessments (and where appropriate Job Hazard Analysis) are conducted for new products, processes, maintenance practices and construction installation processes.

- Procedures and engineering controls are developed to eliminate or control identified hazards and associated risks.

5.1 COMPANY APPROACH TO RISK ASSESSMENT

In order to prevent, minimise and control risks a continuous process of risk assessment is operated. The purpose of the assessment is to identify the actions that are necessary to remove or control the risks highlighted by the assessment. All managers / supervisors are responsible for ensuring that suitable and sufficient assessment of the risks to the environment, health & safety, not only of their employees whilst at work, but also to others not in our employment, are undertaken and that control measures are operated for the areas under their responsibility. This Risk Assessment approach applies equally to site conditions, work tasks, the selection of substances used at work, the design of existing and new processes and products / components. Risk Assessment is recognised as an on-going process that is required to be completed whenever hazards to the environment, health and safety are created by the company's activities. Training in Risk Assessment and Job Hazard Analysis is given to all relevant personnel.

The Company operates a structured approach to risk assessment addressing all the activities in which it is engaged, e.g. Maintenance, Construction, Office and Manufacturing locations. In addition, as well as requiring every work contract to be assessed, the Company also operates procedures to ensure new service locations and unusual work activities are assessed and reviewed prior to commencement of the work. Assessments of our normal field operations has been prepared on a generic approach and form the basis of Company training. The generic Risk Assessment details the hazards, risks and necessary control measures that are compulsory for employees to follow in routine and standard situations and these control measures are detailed in the Company's Employee & Contractor Safety Handbook. The control measures reflect good working practices, legal requirements and the requirements of Otis Worldwide Job Site Safety Standards. These generic assessments and control measures are considered in conjunction with the site-specific surveys and assessments in order to achieve safe working conditions. Field employees are trained to undertake Job Hazard Analysis to ensure that the established control measures are valid for the task to be undertaken.

To assist in prioritizing risks the Company has adopted a standard approach to risk assessment, which takes account of the likelihood and severity - and can be extended to take account of frequency and numbers of people exposed.

The probable likelihood of an accident occurring is scored on a scale of 1 to 6, as follows:

Probability

The probable likelihood of an accident occurring is scored on a scale of 1 to 6, as follows:

1 = Impossible (Highly Improbable)	The hazard incident can not occur unless by a deliberate act to cause it.
2 = Improbable	So unlikely, it can be assumed occurrence may not be experienced
3 = Remote	Unlikely, but possible to occur in the life cycle of the system
4 = Occasional	Will occur at least once in the life cycle of the system
5 = Probable	Will occur several times in the life cycle of the system
6 = Frequent (Highly Probable)	Likely to occur frequently

Severity

The severity of harm to a person(s) or property is likewise scored on a scale of 1 to 4, as follows:

1 = Negligible	Cut, graze, etc. – requires plaster, no lost time
2 = Minor injury (Low)	Requires treatment – up to three days incapacity (Medical / Restricted Duty / Lost Time)
3 = Serious injury (Medium)	Injury/damage to health resulting in more than three days
4 = Major injury (High)	Fatality, serious accident, broken bones hospitalisation incapacity

Once completed the required precautions identified are taken so that injury or damage is prevented.

Whilst procedures have been designed to address the Company's activities there will be occasions when a situation arises that is not covered by these. In these circumstances risk assessment and where appropriate a written Job Hazard Analysis is conducted.

5.2 RISK ASSESSMENT OF WORK LOCATIONS

The following detail the Company arrangements for the assessment and control of risks.

CONSTRUCTION AND MODERNISATION

Hazard identification and risk assessment is required to be carried out on all construction and modernisation sites prior to the commencement of work on site. A Pre-Start Visit is conducted by the Supervisor / Manager to verify that the generic Risk Assessment is valid for the work to be undertaken. Depending on the nature of the job, the assessment is used to develop a written Safe System of Work Method Statement, which takes account of any Pre-tender Health and Safety Plan details or information issued by the client.

A copy of the Risk Assessment is issued to the client, a copy retained in the contract file and a copy retained in the Engineer's Construction Manual on site.

All engineers are trained to recognise hazards and ensure that the established control measures are put in place. During their training, Construction and Modernisation Engineers receive detailed instruction on the control measures necessary to ensure safe working and these are detailed in the Employee & Contractor Safety Handbook. To ensure that all work is conducted in a safe manner engineers are required to conduct Job Hazard Analysis prior to and whilst completing the work task.

PRE-MAINTENANCE

Prior to quoting for a maintenance contract, each unit will be assessed for basic safety compliance, by the sales consultant. In the event of a bulk contract or tender situation a sample will be surveyed.

MAINTENANCE CONTRACTS

All engineers are trained to recognise hazards and ensure that the established control measures are put in place. During their training, Maintenance Engineers receive detailed instruction on the control measures necessary to ensure safe working and these are detailed in the Employee & Contractor Safety Handbook.

A site specific risk assessment must be carried out on all maintenance units on an annual basis, and when new units enter the service portfolio. Engineers who undertake assessments must have completed the Company Risk Assessment training course and have received instruction on completing the Service Site Risk Assessment. A scannable safety & risk assessment report must be completed for each unit. Where any high risks (above a score of 15) are identified, the engineer must immediately contact their manager to report their findings and agree the action to be taken. For all risks rated above 10 which have been identified a company Danger warning sign must be completed and displayed in relevant locations to warn others attending the unit of the risk(s). The

tear-off copy of the Safety & Risk Assessment Report must be sent to the Repair Estimating section in the Customer Care Centre at Leicester, where it will be scanned for “High and Medium Risks” and a report prepared. The report together with appropriate costings will be sent to the customer and the relevant Account Manager for progressing. The original Safety & Risk Assessment Report will be marked “Processed” and sent to Amiserve for scanning and uploading on to their system. The Field Manager and Account Manager must ensure that all “High Risk” items are eliminated or the risk controlled.

A copy of the Service Site Risk Assessment must be kept in the lift motor room for easy reference by any person attending the unit.

To assist in the risk assessment process an Otis Legislation and Standards Reference Book giving details of specific requirements in terms of legal, Otis WWJSSS and company standards has been prepared and has been issued to those undertaking Service Site Risk Assessments.

REPAIR AND CALL-OUT ACTIVITIES

Where Repair and Call-out operations are undertaken then Risk Assessment of the site and task is completed. For sites under a Company maintenance contract the Safety & Risk Assessment Report is consulted and the findings taken account of when assessing the risks prior to the repair or call-out. A Job Hazard Analysis is conducted taking account of the Site Assessment findings.

NON CONTRACT CALL OUT / REPAIRS

Before work is undertaken on non-portfolio sites a Risk Assessment must be completed to ensure the safety of the engineer working on the unfamiliar equipment. If any high risks are identified that cannot be adequately controlled then the engineer is instructed to stop work and seek advice from their manager.

JOB HAZARD ANALYSIS / TASK RISK ASSESSMENT

All employees and Contractors must follow the Company safe working procedures and the Cardinal Safety Rules at all times. In order that work is completed without injury or damage to the environment, employees and Contractors are required to consider their actions both before and during any task. In addition to following the control measures detailed in the Company’s Employee & Contractor Safety Handbook, a written Job Hazard Analysis [JHA] must be completed to ensure safe working.

The written Job Hazard Analysis and the resultant control measures need to be documented and in some cases authorised by a Supervisor / Manager or Senior Manager. The actual requirements of a written “Job Hazard Analysis” form the basis of Company training and are detailed in the Company’s Employee & Contractor Safety Handbook. Every employee who is required to undertake written JHA’s receives this training, which requires that the engineer identifies the basic steps of the job, determines existing and/or potential hazards of each step and develops actions to eliminate or control the hazards.

PERMITS TO WORK

In order to ensure the safety of Otis group personnel working on site, and the safety of others, a permit to work procedure may be required to be operated. Before a permit is issued to a Contractor or another Otis group department/employee, the Otis group authorized person and the person seeking the permit will visit the work area together. Hazards within the work area will be identified and fully understood by both parties before the work is carried out. Control measures will be agreed and put in place before the work commences. These issues will be recorded in a risk assessment. A copy of the Permit to Work will be posted in the area where the work is being carried out together with the Risk Assessment and method statement attached.

GENERIC RISK ASSESSMENT OF ACTIVITIES

The Company has undertaken a generic risk assessment of the risks that are likely to be created by the Company’s activities. These are detailed in the Company’s Employee & Contractor Safety

Handbook, which also describes the control measures including the Company Rules, and procedures that must be operated to remove or reduce the risks to an acceptable level.

All employees and site contracting companies are issued with a copy of the Company's Employee & Contractor Safety Handbook and they are required to work in accordance with the control measures / safe working methods. Appendix A details the contents of the handbook

PRODUCT DESIGN - COMPONENTS / JOB SPECIFICATION

Risk assessment is undertaken to ensure that environment, health & safety risks are minimised when designing or selecting components and job specifications. The nature of the assessment will vary. Legislation including the Lift Regulations 1997 and the Construction (Design and Management) Regulations require documented Risk Assessment. The approach adopted when assessing risks at the design and specification stages will follow that detailed in ISO document "Lifts (elevators) escalators and passenger conveyors - Risk Analysis Methodology". Account is also taken of the requirements of ISO /FDIS 14121 "Safety of machinery - Principles of Risk Assessment." When identifying control measures reference is made to the Otis Worldwide Job Site Safety Standards and to European Standard EN 81.

COMPANY PREMISES

Documented hazard identification and risk assessment of company premises is conducted. Existing control measures are detailed and analysed to ensure that they adequately control the risks. Any additional control measures are identified and progressed by the departmental manager.

For each Company premise an Emergency Plan is prepared detailing the actions to be taken in event of an emergency. As a minimum, the Plan details action to be taken in event of a fire. Personnel on each site are required to be familiar with the procedure and practice the evacuation on a regular basis at least once per year. Training is given to key personnel identified in the Emergency Plan.

SUBSTANCES HAZARDOUS TO HEALTH

Selection of materials not only takes account of the satisfaction of technical requirements but also take account of health and safety implications and environmental impact created by the material. In order to achieve this all substances and materials are assessed and approved by the Environment Health and Safety Department before being used for the first time. The specifier or purchaser of any substances / materials is required to obtain the appropriate Material Safety Data Sheets from the supplier and pass these to the Environment Health and Safety Department before that substance can be purchased or used.

A Control of Substances Hazardous to Health [C.O.S.H.H.] Assessment is prepared by the Environment Health and Safety Department and recorded. These COSHH Sheets are used to communicate information concerning ingredients, chemical characteristics, fire and explosive hazards, health hazards, reactivity data, precautions for safe handling and use and control measures. The completed COSHH Assessments are made available throughout the Company. Any necessary control measures are detailed in the Company Employee and Contractor's Safety Handbook.

MANUAL HANDLING

In order to remove / reduce the risk of manual injuries from transporting, supporting or bodily force, assessments are made of the task being performed by the employee's manager. Training in Manual Handling Assessment is given to all personnel required to complete these assessments. All employees receive training / instruction in manual handling techniques. Wherever possible it is company policy to use mechanical lifting / transportation equipment to reduce the risk of manual handling.

EXPECTANT AND NURSING MOTHERS

Account is taken of the particular risks to new and expectant mothers when assessing risks in the workplace. If the particular risks to expectant mothers cannot be avoided then changes to their working conditions may be required.

Where the risk assessment shows there is a substance or work process in the workplace that could damage the health of the new or expectant mother or their child, then action is taken.

YOUNG PERSONS

Before employing young persons i.e. under the age of eighteen years, a specific risk assessment addressing the suitability of the young persons to do the job is conducted. This assessment builds on the assessments required by the earlier sections and takes account of specific factors. These include the particular site where they will work; the nature of any physical, biological and chemicals agents they will be exposed to, the length of time and to what extent.

As a consequence of this further Risk Assessment it may be necessary to prohibit the young person from certain work activities. It is company policy that persons under the age of eighteen years are not permitted to work in the hoistway and machine rooms. In other locations they are closely supervised. They are not allowed to use high-risk lifting machinery e.g. cranes, site hoists and fork lift trucks etc. unless they have been specifically trained and authorised to do so.

Where children under the school leaving age are being employed on Work Experience Programmes then the parents / guardians are made aware of the key findings of the risk assessment and the control measures operated before the child starts work.

DISPLAY SCREEN EQUIPMENT

The company provides information; instruction and training necessary to ensure the health and safety of employees who use display screen equipment. Managers and supervisors who are responsible for users of display screen equipment are also given appropriate training.

Trained assessors review the assessment completed by the user and workstation on a regular basis. The company ensures that all workstations comply fully with the requirements set out in the schedule to the regulations.

Workstation users are normally be entitled to a free sight test conducted by an optician every two years. Where corrective glasses are prescribed as a result of a sight test the Company provides a basic pair of glasses at no cost to the employee.

6.0 TRAINING AND EDUCATION

Training and education are recognised as fundamental components of a strong environment, health and safety system. Both have an enormous impact on programme development, implementation and maintenance. Education and training is not limited to certain segments of the workforce but is considered an integral element of each employee's understanding of their job.

Provision is made for the necessary training and education of all levels of employees. A training plan is established that outlines and prioritises the yearly training activity. This plan includes projected attendees, subjects and timing. The training activity is prioritised based on the assessment, prevention and control process.

The plan for Environment Health and Safety training is prepared and agreed by the Executive Safety Review Board on an annual basis. This details the essential Environment Health and Safety Training that must be delivered to employees and, where appropriate, Contractors during the year.

It is the line managers' responsibility to ensure that the training detailed in this plan is delivered in accordance with the designated timetable. Any training detailed in the Annual Company Training Plan is in addition to the requirement that all new and transferred employees who must receive the Environment Health and Safety Training.

In addition to the Environment Health and Safety Training Plan detailed above, other environment health and safety training sessions may be included at Regional level. Additional to this training

material, training sessions may also be delivered on any topic included in the Company's Employee and Contractor Safety Handbook by line managers.

Line Managers are responsible for the delivery of all Training Sessions, which are recorded on a Training Record Log, which is sent to the Human Resources Department immediately after the training in order that the Training Records are updated.

ANNUAL COMPANY EH&S TRAINING

The Annual Plan includes provision for the following:

Field Management/Supervision

All levels of management/supervision are provided with the knowledge and skills necessary to manage the environment, health and safety process.

Newly appointed managers and supervisors receive instruction concerning environment, health and safety duties and responsibilities of their position.

Periodic refresher courses are conducted covering new regulations and work practices.

Employees

Specific induction training is provided to all new starters.

Every three months, Safety Awareness Training sessions are provided for all workplace hazards, e.g., lockout/tag out, working at heights, live electrical working, protective equipment, manual handling, shaft access/egress, hoisting and rigging, false cars; etc.

On an annual basis all field employees must complete Otis EH&S Accreditation [See below]

Technical staff

All assigned safety and environmental staff are provided with formal training directed at enhancing their professional skills and education.

Contractors

Specific training is given to Contractors who work for Otis. All contractors are required to work in accordance with Otis Environment, Health & Safety requirements. Pre-work Approval of contractors is conducted and this includes a review of their training. Contractor's employees working on Otis sites must complete the annual Otis EH&S Accreditation. The EH&S Training and Accreditation of EH&S Approved Contractors is overseen by the Purchasing, Environment Health and Safety and FOD / Training Departments.

COMPANY SAFETY ACCREDITATION PROCESS

In order to ensure that the delivered safety training is effective a process of testing and accreditation is conducted for all personnel who work in the field. This includes non-field employees who attend sites and Contractors who are employed by the Company.

The EH&S Department will prepare the test papers and line management will be responsible for the timely completion of the tests. 100% success rates are required.

Upon the completion of the testing, the manager is required to send the signed accreditation pass sheet to the EH&S Department who will prepare the accreditation card. A copy of the pass sheet must be sent to the HR Department in order for the information to be logged against the individual employee's training record. Results of contractors accreditation should be sent to the purchasing department. All employees and contractor's employees who work on field activities must be able to provide evidence that accreditation has been achieved.

SAFETY ACCREDITATION OF NON-FIELD EMPLOYEES

Otis recognises it has a responsibility to ensure the safety of all its employees including sales people, sales managers, sales engineers and any other non-field employees especially where it is possible they may come into contact with lifts and lift machinery. The hoistway, pit and car top are

known areas of a lift installation to pose the highest risks to people working on lifts. Therefore, it is expressly forbidden for any non-field employee to access any of these areas unless they have been specifically Accredited or are under the supervision of an employee who holds full accreditation.

6.1 EMERGENCY RESPONSE PLANNING

Training in the procedures to deal with emergencies is necessary to minimise employee injury, property damage and environmental harm. To this end the Company requires that each location prepare an Emergency Plan which details action to be taken in an emergency situation.

The steps listed below provide a generic guideline of the items, which are required to conform to that requirement:

- Emergency escape procedures and emergency escape routes.
- Procedures to be followed by employees.
- Procedures to account for employees after evacuation have been completed.
- Rescue and medical responsibilities
- Procedures for reporting fires and other emergencies.
- Designated key contacts

Locations which have stores / warehouses have additional responsibilities because of the storage of oil, lubricants, cleaners and waste oil etc. Key personnel are required to undertake additional training on the following items:

- Additional emergency phone numbers
- Procedures for managing and reporting spills.

6.2 SAFETY INDUCTION TRAINING FOR NEW EMPLOYEES, ETC.

All new employees and inter-company transfers undergo environment, health & safety induction training in accordance with the company's procedure. Documented training check sheets are completed covering all the items detailed during that training. The completed check sheet is signed by the new employee and the manager delivering the training to confirm that the items have been fully explained and are understood. The check sheet is forwarded to the Human Resources Department so that the training can be entered on the training records and for retention in the individual's personal file.

7.0 COMMUNICATION

Means of communications are established to ensure all employees receive information necessary to safely perform their functions and enhance their general awareness of safety and environmental issues. It is recognised that this communication needs to be a two way process so that concerns and issues can be raised and progressed by line management.

In addition to routine opportunities to communicate environment, health and safety messages e.g. during Training Courses, Site Inspections and Audits, line managers organise regular meetings to ensure that all environment, health and safety developments, and best practices are communicated to maintain and stimulate interest in the environment, health and safety.

The Company has established ongoing means of communicating pertinent information.

- Line management holds regular Safety Communication meetings where Environment, Health and Safety will be discussed.

- When conducting Inspections and Audits, management use the opportunity to communicate Environment, Health and Safety issues.
- Environment, Health and Safety issues are published in Company newsletters, magazines, etc.
- Posters, notices, accident reports e.g. Just a Minute publications and Quality Instructions are used to increase safety awareness.
- Details of investigations into serious accidents and incidents are directly communicated to all relevant employees either by mail to their home address or some other reliable means e.g. electronically or by attachment of notices to pay slips.
- The Environment, Health and Safety Committee structure involving Regional, National and Executive Committees are used as a means of communicating and responding to employee concerns and issues.
- The Dialog means of communication is to be used by employees who wish to raise issues whilst remaining anonymous.
- The reporting of Near Hits is actively encouraged and can be directly reported through Otisline.
- A reward and recognition scheme is operated.

On a bi-monthly basis the environment, Health & Safety Department publishes Safety Bulletins that typically contain:

- Recently identified, key safety issues arising from Board Reviews.
- Safety reports with discussion, questions and supporting guidance.
- Other pertinent safety related information for communication to the field i.e. Safety Alerts / Weekly Safety Review Board Actions / Safety Metrics.

The safety communications programme is designed to provide a process to enable two-way safety communication from the Environment, Health and Safety Department and Senior Management to and from the entire workforce and contractors.

8.0 RULES AND PROCEDURES

Cardinal Rules for the implementation of sound environment, health and safety principles and practices are established, communicated and enforced. All employees and Contractors are required to adhere to these Company rules and procedures pertaining to the environment, health and safety. These Cardinal Rules have been established to protect our employees, contractors, customers, the general public and to fully comply with all legal requirements and best practice. Compliance with established rules, procedures, environmental protection policy standards and work practices are enforced by line management.

Every manager / supervisor is required to be familiar with the rules and procedures relevant to the work activities and ensure their application.

- The Company publishes and issues to each employee a copy of the Field, Workshop, Escalator / Moving Walkway and / or Management Rules as applicable to that employee (See Section 1.1 of this Policy).
- Managers / Supervisor detail the meaning and requirements of each rule when the rules are issued.
- All employees are expected to be familiar with the rules and are required to obey them at all times.
- On an on-going basis detailed procedures are being documented and issued to relevant

employees.

The rules and procedures are based on the results of risk assessment and using the results from information obtained through incident investigations, written job hazard analysis, assurance audits, job site inspections and corporate and regulatory requirements.

Where it is considered that the rules and procedures do not adequately cover all aspects of the business, employees are required to refer to line management so that they can be reviewed and, if necessary, revised by the Executive.

The effective enforcement of the rules and procedures is the responsibility of line management.

8.1 OTIS EMPLOYEE AND CONTRACTOR SAFETY HANDBOOK

The Employee & Contractor Safety Handbook [see Appendix A] contains detailed explanation of the rules and procedures required of all employees and sub-contractors. All employees and contractors are required to be familiar with the contents of the handbook and work in accordance with its requirements. Breaches of the procedures and requirements detailed in the handbook will be subject to disciplinary action as detailed in Section 1.2.

8.1.1 METHOD STATEMENTS DETAILING SAFE SYSTEMS OF WORK

Whilst the Employee and Contractor Safety Handbook provides detailed explanation of the rules and procedures required of all employees and contractors, the company is increasingly providing documented safe systems of work in the form of Method Statements, particularly for repair work.

These Method Statements are prepared by the FOD function in conjunction with the EH&S Department after the completion of Risk Assessment of the job. The Method Statements detail in a step-by-step format how the work is to be conducted. It is essential that the work is undertaken by the experienced and competent lift engineer completing a written Job Hazard Analysis before and whilst undertaking the task to ensure that the prescribed control measures are adequate to achieve safe working.

8.1.2 MANAGEMENT OF CONTRACTORS

All contractors conducting works on behalf of Otis do so in accordance with the Otis Environment, Health and Safety Policy requirements.

The person in Otis who has the responsibility for the work on the site is deemed to be the "Contract Co-ordinator" for that work and is responsible for ensuring the co-ordination of the work undertaken by contractors and others who may be affected by the work activity. Where deemed necessary the Contract Co-ordinator will issue "permits to work" in order to control the inter-relationship of works between Otis' and contractors' employees and the effects that such works may have on others.

Otis requires that all contractors conduct their work to the standards detailed in the Otis environment, health and safety procedures and contained within the Otis Employee and Contractor's Safety Handbook.

All contractors are required to satisfy Otis of their ability to perform the work in a safe and environmentally responsible manner and in accordance with legal requirements and Otis environment, health and safety standards. All contractors are required to complete the form "Otis Sub-Contractor's Health & Safety Questionnaire". The completed form is vetted by the EH&S Department and where appropriate approved.

Only those contractors authorised in accordance with the relevant procedure who are on the Company's Approved Contractor Lists are used.

Contractors are required to complete their own site risk assessment and required to comply with all applicable Otis Cardinal Safety Rules and procedures. Where work is to be performed by a contractor who is not familiar with lift and escalator equipment then strict controls are applied.

Contract Co-ordinators ensure that all accidents and near hits that occur to contractors' employees are reported immediately.

9.0 INSPECTIONS AND AUDITS

On an established basis, regular inspections including Fatality Prevention Audits are made of employees and contractors at work by line management and Safety Representatives. These inspections are supplemented by regular audits made by Senior Company Management and Environment, Health and Safety Department personnel.

Workplace inspections serve three distinct purposes.

- First, to determine the effectiveness of the management system;
- Second, to identify potential hazards and risks; and to ensure understanding and implementation of safety requirements;
- Third, to stimulate and maintain employee interest.

9.1 SAFETY INSPECTION / AUDIT PROCEDURES

9.1.1 FATALITY PREVENTION / SAFETY MANAGEMENT AUDITS

The Otis Fatality Prevention Audit (FPA) is designed specifically to focus on the five areas involved in nearly 95% of Otis fatalities worldwide and the approach has been integrated into the UK Service and Construction Inspection process.

The purpose of the FPA process is to determine whether the control of imminent danger hazards has been achieved. Imminent danger is considered as any practice or condition where an imminent danger exists which could be reasonably expected to cause death or serious injury. If the hazard is controlled such that the likelihood of fatal or serious injury is improbable, then imminent danger has been eliminated.

Audits of the Company Safety Management System are also conducted to determine compliance with the established rules and procedures and to determine the effectiveness of the Company Safety Management System. Where deficiencies are identified, Corrective Action Plans together with time scales are developed and progressed.

A copy of the completed Safety Audit form is passed to the branch for retention on their Safety File and a copy forwarded to the relevant director. Copies of audits conducted by Directors etc are forwarded to the Environment, Health and Safety Manager

The following details the Company's programme of Field inspections / Audits.

Executive Directors

Each Operational Director undertakes one unannounced Fatality Prevention Audit per quarter. They may be accompanied by a member of the EH&S Department and the appropriate Field Manager. The standard Company FPA form is used.

Non Operational Directors may also undertake unannounced FPAs.

Regional Service Directors & Regional New Equipment Directors

Each Regional Service / New Equipment Manager is required to perform two management audits on their direct reports per year using form - Management Audit for RSD-NED use.

Whilst it is not a requirement for the Regional Service / New Equipment Directors to visit site and conduct unannounced audits this is deemed to be best practice and is encouraged at all times.

Regional Safety Managers

Each Regional Safety Manager is required to undertake an Audit on their Regional Service and New Equipment Directors twice per year using the form - Management Audit for EH&S use.

District Service Managers and Regional Construction Managers

Each District Service Manager and Regional Construction Manager is required to perform two audits per year on their direct reports.

These audits consist of the following:

Audit of Field Managers -

- (i) A Management Audit using form - Management Audit for DSM-RCM use.
- (ii) Observation and verification of a Field Manager conducting an unannounced FPA on one of their engineers, preferably an engineer who has in the past achieved 100% on an FPA.
- (iii) A condensed FPA on the Field Manager using the company FPA form to verify the FM's competency in the following areas:
 - Top of Car Access
 - Pit Access
 - Fall Protection

Audit of other "Non-Field Staff" that attend site -

- (i) Complete a copy of the form - "Inspection form for Non-Field staff that attend site".
- (ii) Where a non-field employee has un-supervised access to the TOC, Pit and Shaft - a condensed FPA must be undertaken to verify their competency in the following areas:
 - Top of Car Access
 - Pit Access
 - Fall Protection

The Company FPA form is used.

Field Managers

Each Field Manager is required to conduct four un-announced audits on each engineer (one per quarter), which will consist of the following:

- (i) Fatality Prevention Audit
- (ii) Safety Inspection
- (iii) Fall Arrest Inspection

Each of the above identified people responsible for undertaking audits are responsible for the completion of a Corrective Action Plan for any non-conformances found using the Company Standard Corrective Action Plan.

The Company Standard Corrective Action Plan is completed even if the only action required was on-site coaching or other minor corrective actions as it is an essential analysis tool for use to determine what future safety training needs to be conducted.

A schedule to ensure contractors are inspected on a regular basis by line management is also prepared, where the Contractor Co-ordinator i.e. the Manager responsible for the contractor on site completes at least one inspection of a contractor every three months.

At the end of each quarter, a Quarterly Inspection Tracker Report is completed by each Manager detailing the Safety Inspections / Audits that have been conducted during the previous three months.

The Quarterly Inspection Report gives brief details of any outstanding issues not resolved and includes details of the person responsible for the outstanding corrective action and the completion date.

9.1.2 INSPECTIONS

WORKSHOPS

First line management e.g. Supervisors / Managers formally monitor workshops under their control on a monthly and quarterly basis using the appropriate Workshop Inspection Forms.

OFFICE AND OTHER LOW RISK AREAS INCLUDING BRANCH OFFICES

First line management e.g. Departmental Managers formally monitor each of the sections, departments and areas under their control every three months.

A Managers/ Supervisors Safety Inspection - Offices form is completed for each section, department and area monitored.

RESULTING ACTION

Where activities/situations are identified contrary to the Company's Environment, Health and Safety policies then corrective actions must be taken and the details recorded on the form. Such corrective actions identify those responsible for rectification together with a target completion date.

Should any training needs be identified as a consequence of the inspection then these are progressed and a record maintained on the form.

The completed Safety Inspection form is kept on the Managers / Supervisors Safety Inspection file held at the branch office. If appropriate a copy of the completed Safety Inspection form may be kept at the relevant site.

10.0 INCIDENT INVESTIGATIONS

All accidents, illnesses, dangerous occurrences and incidents including those with the potential to damage the environment are immediately reported and investigated by line management. Incident investigations involve a methodical examination of the event directed toward determining the causes and developing remedial actions to avoid or control the hazards and associated risks in future.

The Otis Management Weekly Review Board led by the Managing Director requires the responsible Regional Director to present a report on every Recordable Accident usually within 21 days of the event. The responsible management should be prepared to discuss the findings of their investigation to include a description of the incident, circumstances, root cause and actions taken and plans to prevent recurrence. Presentation is by way of Company AR2 template.

10.1 ACCIDENT TO EMPLOYEES REPORTING PROCEDURE

All accidents to employees and contractors arising out of or in connection with work are reported to the Environment Health and Safety Department using the Company Environment Health and Safety Incident Report Form AR1. These accidents include injuries arising from violence at work and road traffic accidents resulting in injury to employees. Form AR1 is completed by the employee's Manager / Supervisor, who conducts a thorough investigation of the circumstances leading to the accident. Form AR2 is used to present the detailed findings.

All serious accidents (which are deemed to be those which result in absence from work or where the employee is unable to undertake normal duties) must be reported to the Managing Director and Safety Department immediately i.e. directly by e-mail, telephone or fax detailing the currently known information using the Company's "48 hour" report form. Copies of the completed form are then sent to the relevant Director, Regional Director, Environment Health and Safety Manager (and Operations Manager where appropriate).

Any other accidents and incidents i.e. no 'lost time' accidents, work related diseases or dangerous occurrences must be reported to the Environment Health and Safety Department as soon as possible but certainly no later than four days after the event by the submission of the Company Environment Health and Safety Incident Report Form AR1.

Details of all accidents are also recorded in the Statutory Accident Book BI510 held at Branch / Site locations. Accidents are formally reported to the Client, or where the Construction (Design and

Management) Regulations apply, the Principal Contractor.

The employee's Manager / Supervisor completes a full investigation into the circumstances and where appropriate submits a report detailing conclusions and recommendations to avoid similar accidents occurring in the future.

The EH&S Department is responsible for the completion and submission of form F2508 as required by the RIDDOR Regulations.

Correspondence relating to Employer Liability Insurance claims is handled by the Company's Legal Department supported by the individual's line manager, liaising with the Environment Health and Safety Department where necessary.

A Serious Incident Review Board may be established to conduct thorough and formal investigations into accidents or dangerous occurrences. A Director or Senior Manager chairs the Serious Incident Review Board.

On the return to work of the injured employee, an interview is conducted by the Manager / Supervisor to establish whether the individual is fit to return to normal duties and to consider the cause of the accident and how such events can be avoided in future.

A full understanding of the events leading to the accident / dangerous occurrence / Near Hit has to be obtained so that such incidents can be avoided in future.

Employees involved in accidents / dangerous occurrences may be required to attend the next Regional Safety Committee Meeting in order that all aspects of the accidents can be explored.

10.2 REPORTING OF DANGEROUS OCCURRENCES / "NEAR HITS"

All potentially dangerous events are reported IMMEDIATELY in a similar manner to Employee Accidents even though they did not in fact cause injury. Dangerous Occurrences / Near Hits are defined as unplanned events with the potential to cause injury or damage including damage to the environment. If any doubts exist whether events should be reported then the Environment Health and Safety Department must be contacted.

Employees are required to report "Near Hits" but they may do so via their Safety Representative or through Otisline. The details of any Dangerous Occurrences [as defined by RIDDOR] must be recorded by completing the relevant aspects of the Company Environment Health and Safety Incident Report Form AR1 and forwarding it to the Environment Health and Safety Department.

10.3 ACCIDENTS INVOLVING THIRD PARTIES

All accidents to members of the public or where property of third parties is damaged arising out of or in connection with the use or operation of any equipment supplied or serviced by the Company is reported to the Environment Health and Safety Department using the Company Accident to Public form AR3. Form AR3 is completed by the Line Manager / Supervisor, who conducts a thorough investigation of the circumstances leading to the accident.

All serious accidents (which are deemed to be those which result in the injured member of the public requiring medical treatment) must be reported to the Environment Health and Safety Department IMMEDIATELY the company is made aware i.e. by telephone, or fax - ideally on form AR3. Any other accidents are reported to the Environment Health and Safety Department as soon as possible, by the submission of the Company form AR3.

The Line Manager / Supervisor completes a full investigation into the circumstances and where appropriate submits a report detailing conclusions and recommendations to avoid similar accidents occurring in the future. Copies of such reports must be copied to the Legal Department.

At the discretion of a Director or the Environment Health and Safety Department a Serious Incident Review board may be established to conduct a thorough and formal investigation into an accident or

dangerous occurrence. The Serious Incident Review Board is chaired by a Director or Senior Manager.

A full understanding of the events leading to the accident / dangerous occurrence is obtained so that such incidents can be avoided in future.

11.0 MAINTENANCE OF RECORDS AND DOCUMENTATION

Comprehensive records and documentation of activities to effectively manage the environment, health and safety functions at all levels are maintained. Systems have been established for managing and maintaining these records as well as responding to enquiries and requests for information. The Company prepares and maintains records indicative of their Environment Health and Safety performance.

Amongst the records and documents maintained the following categories of information are available:

- Policies
- Organisation and Oversight
- Annual Plans
- Assessment, Prevention and Control Activities
- Education and Training
- Communications
- Rules and Procedures
- Inspections and Audits
- Incident Investigations
- Safety Equipment
- Minutes of Environmental Health and Safety Meetings and follow up-actions

12.0 PROGRAMME EVALUATION

Ongoing monitoring and evaluation of the environment, health and safety management system is undertaken to assure its continuing effectiveness in achieving the established goals and in responding to business needs and priorities. The Company conducts a comprehensive evaluation of the Environment Health and Safety Programme on an annual basis. The evaluation process involves line management and considers the results of internal audits and inspections e.g. Senior Management, Environment Health and Safety Audits, Fatality Prevention Audits. A review of Otis Standard Practices is conducted annually.

12.1 OTIS SAFETY AND ENVIRONMENTAL ASSESSMENT SYSTEM

An integral self-evaluation of the company's management of employee safety and environment risk factors is undertaken annually using an Assurance Review Rating System, which gives a numerical assessment of the operation's overall management of environment, health and safety.

The evaluation criteria has been developed for each of twelve elements. These items are considered fundamental for an effective safety and environment management programme and form the basic structure of a comprehensive management system as defined by this Company Policy. For each of the twelve elements a list of criteria and weighted scoring has been developed.

The results of the Programme Review including identified deficiencies and opportunities for improvement are considered by the Executive when preparing the Annual Environment Health and Safety Plan.

APPENDIX A

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