

HEALTH & SAFETY POLICY

1 STATEMENT OF INTENT

The health and safety of everyone working for or with Thum + Mahr is the guiding principle for all our operations worldwide. Fostering health and safety is part of our business culture and reflects our balanced responsibilities towards the individual and business results. We strive to achieve and maintain a leading position in our field by continuous learning and improvement, benchmarking and exchanging experience both internally and externally.

Quality, Health and Safety are the responsibility of management, with the active commitment of all employees.

The company will seek to minimise the risks and protect the health, safety and property of our employees, our customers, our contractors and the public.

Thum + Mahr will provide a working environment and facilities that meet with current standards and which will facilitate a fit, enthusiastic and committed workforce.

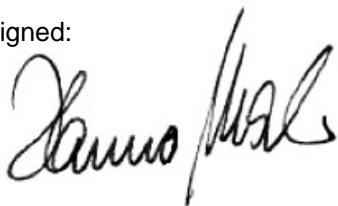
In keeping with it's commitment to continuous learning and improvement Thum + Mahr will recruit and develop a competent workforce and will provide training to enable employees to work safely.

Thum + Mahr encourages and welcomes workforce involvement in health and safety. The Company recognises that the workforce have a part to play in maintaining high standards of health and safety and that they should take reasonable care of themselves and of other persons who may be affected by their actions. Workers should co-operate with the company to enable it to meet its health and safety standards and should bring any health and safety risks to the manager's attention.

This policy will be co-ordinated with other business and human resources policies to avoid conflict. It will be reviewed along with the organisation and arrangements as may be appropriate, or at least annually.

The policy and any changes to it will be brought to the attention of all those who work for it.

Signed:



Hanno Mahr - Director

Date: 18 March 2004

Signed:

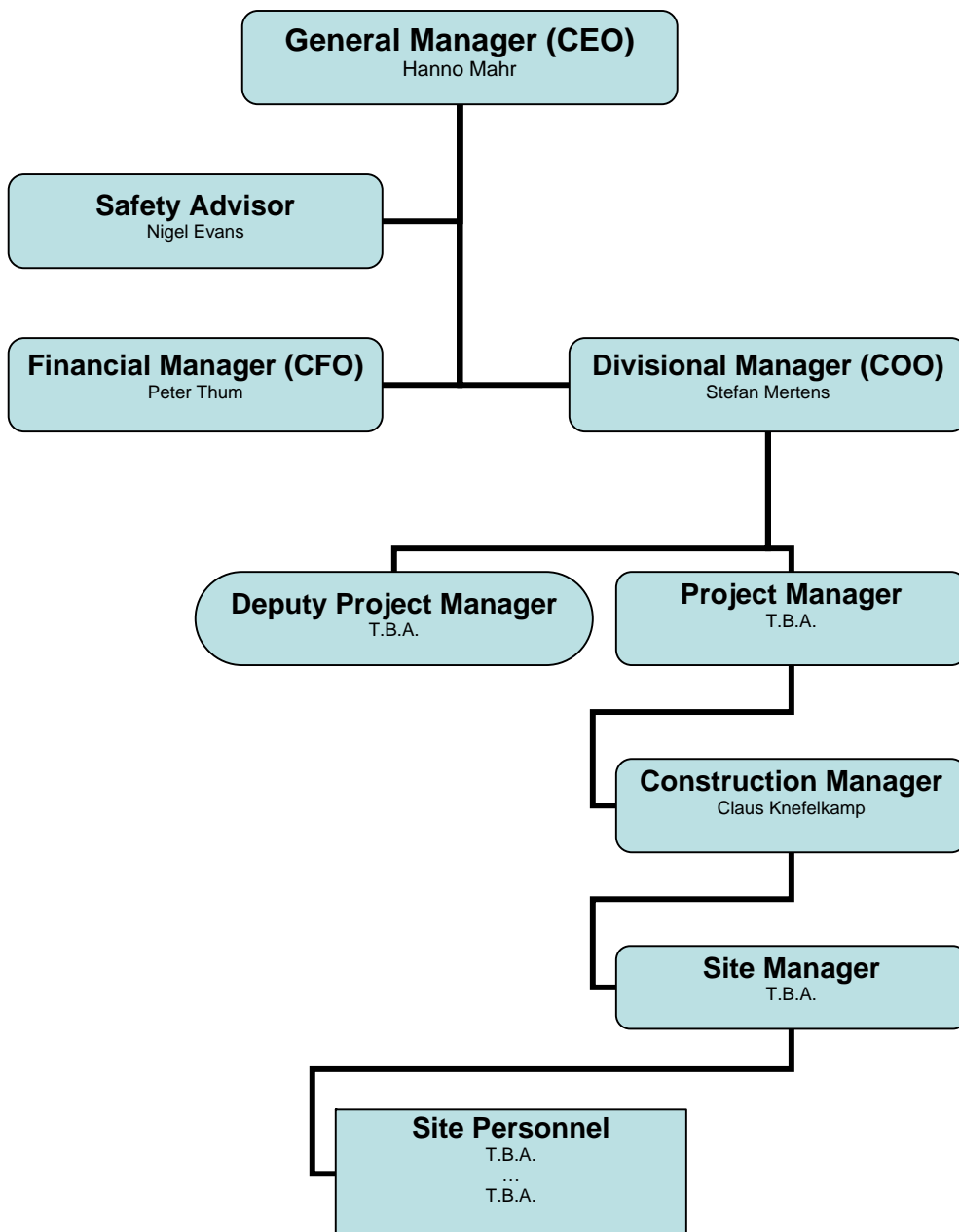


Peter Thum - Director

Date: 18 March 2004

2 ORGANISATION

This sets out the organisation of health and safety for Thum + Mahr and includes the responsibilities of all who work for the company. These responsibilities may be supplemented by specific responsibilities of individual managers and staff these should be included in the individual job specifications.



2.1 Day-to-day responsibility for the management of health & safety

Name: Claus Knefelkamp
Position: Team Manager MOST (Montage & Installation) of Thum + Mahr GmbH
Phone: +49 – 2173-967-329

Address: Thum + Mahr GmbH
Heinrich-Hertz-Str 1-3
D-40789 Monheim, Germany

2.2 Directors

The responsibilities of Directors are as follows:

- A) to determine that the Company has an effective health and safety policy and that this is being implemented across the business. To take note of and act upon health and safety requirements as they affect the company and the work it undertakes at home and abroad.
- B) to support the health and safety programme and persons who are active in implementing it.
- C) to provide the necessary resources to enable health and safety requirements to be met.
- D) to be concerned about the safety of persons wherever the company has a presence.

2.3 Managing Director

The Managing Director has been appointed by the directors to have overall responsibility for health, safety and welfare at Thum + Mahr and is responsible for ensuring that:

- A) there is an effective, signed health and safety policy that has been approved by the directors and that the policy is revised as appropriate.
- B) all directors are aware of and informed about the health and safety programme at Thum + Mahr and that a report on health and safety is presented at each board meeting.
- C) a Health and Safety Advisor is appointed and that he or she has the necessary level of competence and resources and is provided with the support needed to be able to carry out the health and safety programme.

2.4 Health and Safety Advisor (Competent Person)

The Health and Safety Advisor will be responsible for the development and co-ordination of the health and safety programme. These responsibilities will include:

- A) to develop and agree with the Managing Director the health and safety plan which will include a health and safety training plan;
- B) to make recommendations to the Directors for the revision of the Health and Safety Policy;
- C) to ensure that the arrangements within the Health and Safety Policy at Thum + Mahr are appropriate to the risks;
- D) to ensure that all Managers and Supervisors are aware of their responsibilities for health and safety;
- E) to be informed of Health and Safety Regulations and other relevant guidance, and to keep the Directors and Managers informed of these matters;
- F) to carry out site inspections and investigations
- G) to prepare a progress report on the health and safety programme for presentation by the Directors;
- H) to enable the Health and Safety Advisor to fulfil these responsibilities he will have the support of the Directors as required.

2.5 Managers and Supervisors

Managers and Supervisors are responsible for any workers that they may have under their control. Managers and Supervisors responsibilities are to:

- A) implement this health and safety policy throughout their areas of responsibility;
- B) ensure all persons under their control understand and follow the policy for health and safety;
- C) allocate adequate resources (including funds) to meet health and safety requirements;
- D) ensure that risk assessments are conducted within their areas of responsibility and that safe systems of work are in place and are implemented for any hazardous activities;
- E) ensure the employees and workers (including new starters) under their control are provided with health and safety training including induction training;
- F) involve and consult with employees and workers under their control on health and safety matters.
- G) investigate all accidents and incidents and report to the company on their finds and recommendations to ensure that they do not repeat;
- H) involve and consult with all employees on health and safety matters.

2.6 General Responsibilities

It is the general responsibility of all who work for Thum + Mahr to:

- A) follow this health and safety policy in their work;
- B) take due care of their own health and safety and that of anyone who may be affected by their activities;
- C) assist with carrying out risk assessments as may be appropriate and with the development and implementation of any safe systems of work;
- D) attend any health and safety training required including induction training;
- E) to take note of any health and safety training provided and follow company procedures;
- F) to use any Personal Protective Equipment provided and to report any defects in the equipment to their manager or Supervisor;
- G) report all accidents or incidents and assist as may be able in the investigation of these;
- H) bring any health and safety hazards or concerns to the attention of the company.