

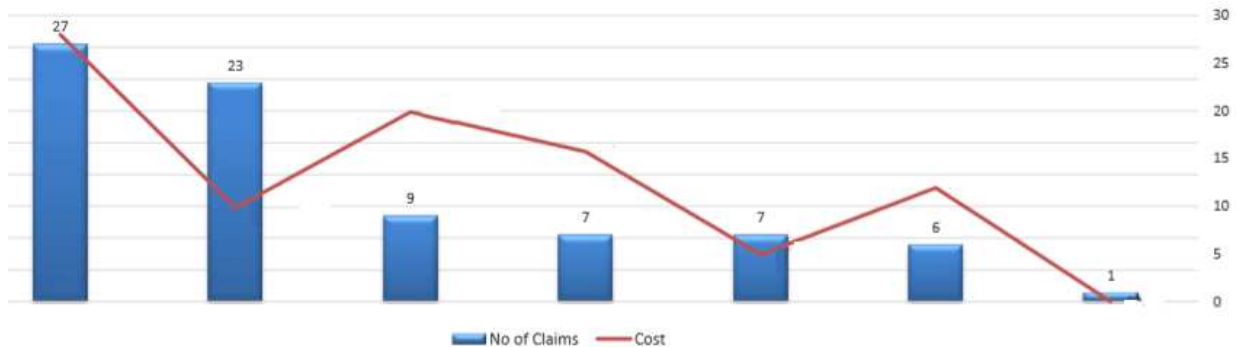
STATEMENT

The TRAD Group will foster a culture of safety leadership and risk management throughout our operations to prevent road related ill health, injuries and incidents. We constantly evaluate our work practices to strive to be always at the forefront of road safety compliance, innovation and good practice (such as compliance with the Freight Operators Recognition Scheme (FORS)).

Note: This Group Policy is applicable to every company within the TRAD Group: TRAD Scaffolding Contractors, TRAD Hire & Sales Ltd, and TRAD Safety Systems Ltd and all companies will ensure full compliance.¹

The Group operates a safety system based upon a process of 'Continuous Improvement' and TRAD's Group CEO Des Moore and Company Heads believe that managing Work Related Road Risk (WRRR) has equal importance to all other operations within the business, including finance, safety, environment and quality etc.

TRAD continually assess and monitor transport risks (including the specific risks of Road Traffic Accidents (RTA's)). TRAD arrange regular meetings with our insurance brokers to discuss recent accidents and accident trends for each individual company within the TRAD Group.



Following the meeting with our Insurance Brokers, TRAD Transport and Safety Managers discuss the trends and required action to prevent reoccurrence in TRAD Transport Forum meetings.

To ensure that the Group operates to best practice in relation to WRRR, TRAD have and will continue to resource each company within the TRAD Group to maintain accreditation to the Freight Operators Recognition Scheme (FORS).



General Requirements for the TRAD Group

Every company have specific Transport Manuals, tailored for that entity, so the following are the general requirements for the TRAD Group.

We will operate in accordance with 'driving at work' legislative and guidance requirements in relation to:

- Health and Safety at Work Act 1974.
- Management of Health and Safety at Work Regulation 1999.
- Provision and Use of Work Equipment Regulations 1998.
- Corporate Manslaughter and Corporate Homicide Act 2007.
- Road Traffic Act 1988 as amended.
- Road Transport (Working Times) Regulations 2005.
- Freight Operators Recognition Scheme (FORS).

Directors aim to reduce the risks to employees and third parties from 'driving at work' activities relating to the business as far as is reasonably practicable. Particular attention will be paid to:

- Provision of adequate resources for effective implementation of the policy.
- Planning for motor fleet risk management.
- The provision of well-maintained and fit for purpose vehicles.
- Provision of adequate information, instruction, training/briefings and supervision of drivers.
- The provision of systems of work that do not put drivers and members of the public at risk from driving activities.

All managers and drivers are required to cooperate with company driving at work policy and procedures relating to managing driving at work activities. Drivers are required to place their safety and that of other employees and members of the public as the highest priority when driving for work.

Responsibilities Relating to Driving at Work

All roles within the business will have responsibilities that relate to keeping drivers safe whilst they are driving as a work activity, and to prevent harm to others.

Directors

- To make adequate resources available to prevent collisions whilst employees are driving at work.
- To ensure adequate controls are in place to manage motor fleet risks arising from driving at work activities.
- To monitor the effectiveness of motor fleet risk management policies and procedures.
- To arrange for regular audits, ensuring that motor fleet risk management is being effectively implemented.

- To form a driving at work safety committee to meet on a regular basis, develop risk management strategies and monitor performance on motor fleet claims.

Human Resources

- Incorporate driving at work content in induction training/briefings for drivers where required.
- Ensure that information on driving at work issues is effectively communicated to drivers.
- Support the use of disciplinary procedures in relation to driver performance.

Health and Safety Manager/ Transport Manager/ Transport Coordinator

- Assist in reviewing motor fleet risk management policies and procedures.
- Undertake accident analysis and provide feedback to the driving at work safety committee.

Transport Manager / Transport Coordinator / Depot Managers

- Must provide authorisation for an employee to drive a business vehicle.
- Ensure the implementation of all company 'driving at work' policies and procedures.
- Implement company disciplinary procedures.
- Vehicle conditions checked weekly.
- Administer the vehicle defect reporting process.
- When required, attend motor fleet risk management committee meetings.
- Assess weather conditions and communicate this with the drivers.
- Carry out driving at work risk assessments.
- Consider driver training/briefing needs on an ongoing basis and make arrangements for training/briefing delivery.
- Ensure vehicles are serviced and maintained, with records kept.
- Undertake accident investigations, following business procedure.
- Ensure motor fleet risk management memos/bulletins are issued to drivers.

Senior Managers

- Ensure relevant managers are provided with training/briefing they need to carry out their responsibilities.
- Ensure that driver risk assessments are completed.
- Ensure drivers are competent and properly trained where required.

- Monitor the implementation of driving at work policies and procedures.
- To assist the investigation of serious accidents.
- To review accident investigations undertaken by depot managers.
- To consult with drivers on motor risk management procedures.
- To ensure all depot managers receive bulletins on motor fleet risk management.
- Undertake driver debriefings after accident investigations.
- When required, attend motor fleet risk management committee meetings.

Drivers

- Carry out vehicle condition checks following the procedure required by the business and keep a written record.
- Sign the mandate form to allow DVLA licence checks.
- Report any penalty points or driving convictions to their line manager.
- Practice defensive driving to protect themselves, other employees and members of the public.
- Must never drive a vehicle if they are unfit to do so or if they are under the influence of drugs or alcohol.
- Must always wear a seat belt and ensure that passengers do so.
- Must always follow the Highway Code and observe speed limits.
- Ensure that your vehicle is maintained in a clean and tidy condition.
- Undertake eyesight tests as required by company procedure.
- Must adhere to the mobile phone policy issued by the Company.
- Record any damage incident to your vehicle using the Company procedure and inform your line manager as soon as possible.

Non-Driving Employees

- Must observe the Company mobile phone policy included below and not require driving colleagues to talk whilst driving.

Arrangements and Requirements for Drivers

Driver Safety

- All drivers are required to follow the Highway Code and the speed restrictions relevant to the road being used.
- Ensure that you and all passengers in the car are wearing a seatbelt during the journey.



Trad Group Policy - Management of Work Related Road Risk

- Any employee involved in a collision in their vehicle must use the accident reporting form. The details of the accident should be phoned through on the number provided to you as soon as possible (as a minimum within 2 hours of the collision).
- Any training, re-briefings or intervention steps offered following a collision in a business vehicle must be taken by the driver within an appropriate timescale.

Licence Checking

- All drivers must have a driving licence that is relevant to the class of vehicle they are required to drive. A new employee will have their licence checked on joining the business and then on at least a 6 monthly basis. The DVLA mandate form is required to be signed by the new employee.
- Any penalty points or endorsements on your licence must be reported to your line manager as soon as possible. Failure to report will result in disciplinary proceedings being taken.

Vehicle Condition

- The business will provide you with a vehicle that is fit for purpose. Vehicles provided by the business will be maintained and serviced in line with manufacturers recommendations.
- You are required to ensure that your vehicle is maintained in an adequate condition with a particular focus on:
 - Tyre pressures;
 - Tread depth;
 - Fluid levels.
- These items should be checked before the vehicle is used.
- Any defect on a vehicle owned by the business must be reported to your line manager immediately. Any vehicle with a serious defect will be taken off the road and repaired immediately.

Journey Planning

- Business journeys by road should only be undertaken when public transport or other means of communication that negate the need to meet face-to-face are not suitable. Journey scheduling will be realistic in terms of timescales and will include adequate rest breaks.
- If you feel too tired to drive safely you must tell your line manager immediately. Overnight accommodation and food can be arranged and the business will make arrangements for accommodation if fatigue is an issue.
- All drivers should take a break at least every 2 hours during a journey. Where required, the management team will monitor weather conditions and will reschedule journeys if road conditions could present a danger to drivers.

Mobile Phone Policy

- It is illegal to use a hand held phone when driving and all employees are required to comply with legal requirements. Whilst it is legal to use a mobile phone with a hands free kit, this presents a significant distraction to the driver and mobile phones should only be used when absolutely necessary. All drivers will be provided with a hands free kit.

- When driving, the mobile phone should be turned off and when a message is received, the driver should pull over when safe to do so, turn off the vehicle ignition and respond to the message. If a call needs to be made, the vehicle must be stopped in a safe place with the ignition turned off before a number is dialled. Any problem with the hands free kit must be reported to your line manager immediately. If a hands free kit is being repaired or replaced and the driver has no hands free kit, they are not permitted to use a hand held phone.
- All office staff must be required to only call a driver when absolutely necessary and understand that a short message must be left so the driver can call back when it is safe to do so. If a driver has to take a call hands free the office staff must ensure that the call is made as short as possible.
- Any driver who does not follow these requirements will be subject to disciplinary procedures.

Other Driver Distractions

There is a range of distractions for drivers and employees are required to follow these requirements:

- Do not eat or drink when driving.
- Ensure that any loads (including those in the back of a car or van) are secured to prevent them moving around.
- Drivers are required to keep other distractions to a minimum.
- Enter destination details into satellite navigation systems when the vehicle is stationary in a safe place. Any devices should not be positioned so as to obstruct the view of the road.

Drink and Drugs Policy

- We take a zero tolerance approach to driving whilst under the influence of alcohol or drugs. Any driver prosecuted for a drink or drug driving offence will be subject to disciplinary procedures that may result in dismissal from the business.
- Drivers are required to report any pending prosecutions for drink or drug driving to their line manager whether or not they were driving for work at the time of the incident. Failure to report a pending prosecution will result in disciplinary action being taken.
- If a driver believes they are over the drink drive limit they must not drive. They must inform their line manager and they will be given duties that do not require driving or they may be required to take a day of annual leave.
- Drivers taking prescription drugs or over the counter medicines must check that their driving performance will not be affected by the medicine. If there is a chance that driving performance is affected the driver must report this issue to their line manager.
- In an employee is concerned that a colleague may be driving under the influence of alcohol or drugs they are encouraged to report their concerns, anonymously if necessary, to a member of the management team.

Grey Fleet Drivers – Using your Vehicle for Work Purposes

- Any employee using their own vehicle for business purposes must have business use cover on their insurance policy. All grey fleet drivers need to present their vehicle registration document (V5), MOT certificate if applicable and insurance policy certificate to their line manager on an annual basis.



Trad Group Policy - Management of Work Related Road Risk

- Any employee using their own vehicle for business purposes must maintain their vehicle in a roadworthy and safe condition. If your vehicle is being repaired and you need to drive for work purposes, give your line manager as much notice as possible so an alternative vehicle can be arranged for you.

Appendix A – Risk Assessment

TASK RISK ASSESSMENTS									
Hazard	Hazardous event	Initial risk			Risk Control Measures	Residual risk			
		L	S	R		L	S	R	RR
Operations	Poor customer relations, complaints and lapse in management systems	3	4	12	<ul style="list-style-type: none"> TRAD Group foster a culture of safety leadership and risk management throughout our operations to prevent road related ill health, injuries and incidents; TRAD Directors/Managers constantly evaluate our work practices to strive to be always at the forefront of road safety compliance, innovation and good practice; TRAD actively seek to maintain relevant standards (such as compliance with the Freight Operators Recognition Scheme (FORS)); TRAD continually assess and monitor transport risks (including the specific risks of Road Traffic Accidents (RTA's)); TRAD arrange regular meetings with our insurance brokers to discuss recent accidents and accident trends for each individual company within the TRAD Group. <p>Note: Each TRAD Company will produce and comply with their Transport Manual, Procedures and Processes.</p>	1	4	4	Low
Operations	Work Related Road Risk incidents such as Road Traffic Accidents and Ill Health etc	3	5	15	<ul style="list-style-type: none"> Each TRAD Company will produce and comply with their Transport Manual, Procedures and Processes, including training/briefing etc; TRAD Managers (e.g. Safety, Transport Manager, Coordinators) will brief employees on the requirement to comply with TRAD SHEQT (Safety, Health, Environment, Quality and Transport) policies, procedures and standards such as FORS and ISO 9001, and to use best judgement and drive safely at all times; TRAD's Group Policy, Company Manuals and Procedure documents, procedures and processes cover all the mandatory requirements for the FORS standard; Manager will also brief them on Company Policy, in particular on the requirement to be fit for work at all times (including complying with the Company's Drugs & Alcohol Policy and Procedures), which will be reinforced with regular toolbox talks on this subject; Transport Manager will investigate all incidents, complaints and infringements in line with company procedure and investigate and analyse all Transport Accidents (as well as related fines and charges received). 	1	5	5	Low

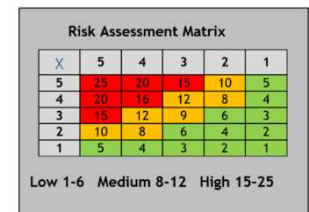
Trad Group Policy - Management of Work Related Road Risk

TASK RISK ASSESSMENTS									
Hazard	Hazardous event	Initial risk			Risk Control Measures	Residual risk			
		L	S	R		L	S	R	RR
Operations	Failure to prevent reoccurring incidents	3	5	15	<ul style="list-style-type: none"> TRAD continually assess and monitor transport risks (including the specific risks of Road Traffic Accidents (RTA's); TRAD's Transport Managers, Transport Coordinators, H&S Managers and Depot Managers will monitor transport; TRAD arrange regular meetings with our insurance brokers to discuss recent accidents and accident trends for each individual company within the TRAD Group; Following the meeting with our Insurance Brokers, TRAD Transport and Safety Managers the trends and required action to prevent reoccurrence, in TRAD Transport Forum meetings; To ensure that the Group operates to best practice in relation to WRRR, TRAD have and will continue to resource each company within the TRAD Group to maintain accreditation to the Freight Operators Recognition Scheme (FORS). <p>Note: Each TRAD Company will produce and comply with their Transport Manual, Procedures and Processes.</p>	1	5	5	Low
Operations	Failure of compliance with TRAD Policies	3	4	12	<ul style="list-style-type: none"> TRAD will arrange full information to be supplied at induction and also at annual reviews; TRAD Manager will explain policy requirements, Group Policies and including H&S requirement that: <i>"it is the duty of every employee while at work to take reasonable care of themselves and others who may be affected by their acts or omissions; to co-operate with the employer so far as is necessary to enable the employer to comply with his statutory duties; and not to intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare"</i>. TRAD Manager will explain policy requirements, including Environment requirement that: <i>"to follow the company's environmental rules and procedures; to minimise waste and recycle waste materials wherever practical; to comply with clients environmental requirements when operating on their premises"</i>. <p>Note: Each TRAD Company will produce and comply with their Transport Manual, Procedures and Processes.</p>	1	4	4	Low

LIKELIHOOD (L) = Frequent (5) - Probable (4) - Occasional (3) - Improbable (2) - Remote (1)

SEVERITY (S) = Catastrophic (5) - Major (4) - Reportable (3) - Serious (2) - Minor (1)

DEGREE OF RISK (DR) = LIKELIHOOD x SEVERITY





Trad Group Policy - Management of Work Related Road Risk

Declaration

TRAD's Management of Work Related Road Risk (WRRR) Policy shall be reviewed as a minimum annually and kept up to date by the Directors named below, to take into account changes in legislation and guidance, and learnt lessons from incidents and near misses, and remain relevant and appropriate to the group, reflect changes in the nature and range of activities carried out by the company and take advantage of operational experience, negative and positive, as often as may be necessary.

The TRAD Group is fully committed to ensuring compliance both with the letter and spirit of the principles of this Policy. For that reason, the directors named below have been appointed with the responsibility and authority to oversee and drive compliance. The policy will be reviewed annually and the Policy will be disseminated throughout the Group as required.

For and on behalf of the TRAD Group

Des Moore, TRAD Group CEO

Dated: as front page

John Paterson, TRAD Hire & Sales, Managing Director

Dated: as front page

Jim Gorman, TRAD Safety Systems, Managing Director

Dated: as front page

Neil Garner, TRAD Scaffolding Contractors, Managing Director¹

Dated: as front page

¹ Please note that TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited.