



WORK SAFE, GO HOME SAFE

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Dear Colleague

Safety has always been an important part of how we go about our work and never more so than today. Our Group is made up of businesses of varying sizes operating around the world, often in challenging environments. It is essential that, as we continue to grow and move into new regions, we can be sure that our approach to safety is equally rigorous, no matter whereabouts in the world, or on which projects, we are working.

To promote your safety and that of colleagues and others impacted by our work, the Board of Keller has adopted the **Keller Safety Framework**. This is a system which links together different aspects of our safety management, including our **Safety Goal, Principles, Policy and Minimum Standards**. Each of these aspects of the **Keller Safety Framework** is described in this booklet.

Our Safety Goal

The construction industry in which all our businesses operate poses significant health and safety challenges but we must not accept that people will inevitably be injured whilst working for us or with us. Our ultimate goal is to have zero injuries through the effective management of safety in all our operations.

Our Safety Principles

Underpinning this goal are three fundamental Safety Principles:

<i>All accidents are preventable</i>	<i>No repeat occurrences</i>	<i>Minimum standards</i>
We believe that all injuries and occupational illnesses are preventable.	All accidents and high potential near misses will be investigated to determine what happened and why.	We will adopt a common set of minimum standards throughout the Group.
We are all responsible for preventing and correcting unsafe behaviour or work conditions.	All necessary steps will be taken to prevent recurrence.	Management at all levels has the responsibility of implementing and maintaining the standards.

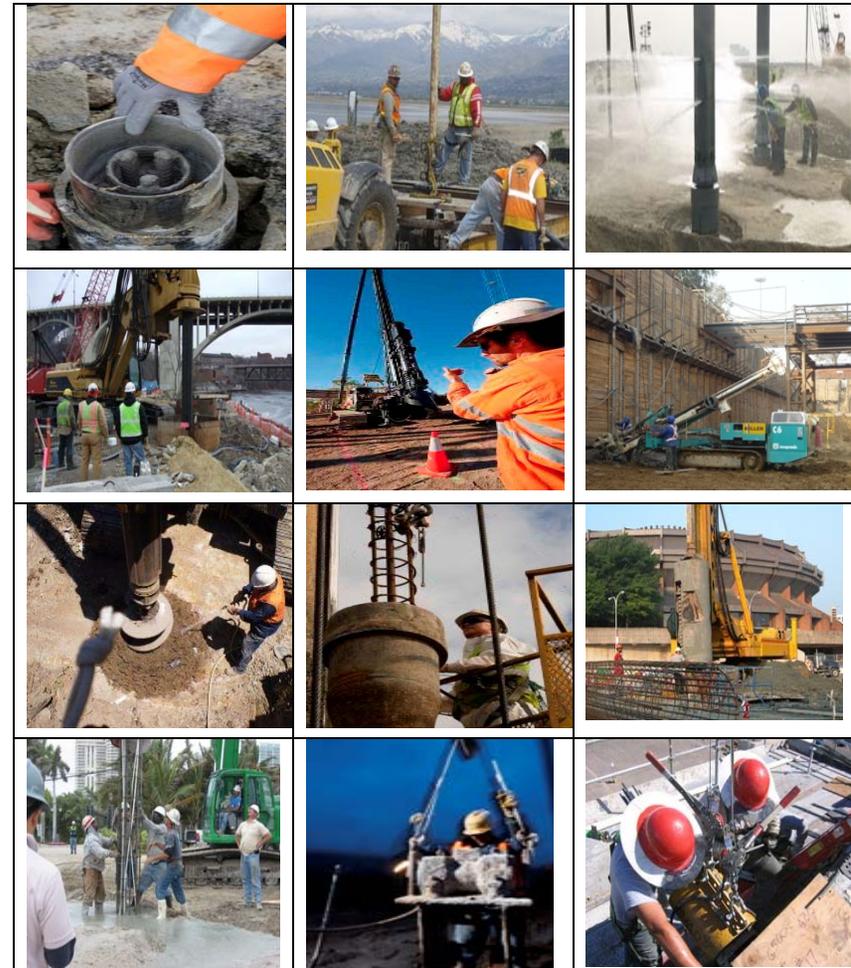
We expect that these Safety Principles will define our safety culture, behaviours and performance standards and, in so doing, assist us in our progress towards eliminating injuries in our workplace.

Our Safety Policy

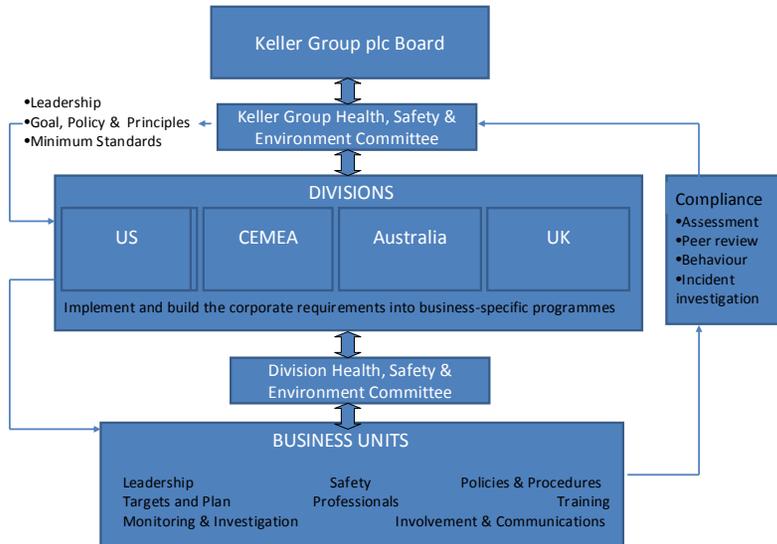
We hold our managers and supervisors accountable for the safety of our people. We expect them to provide effective leadership in safety whilst recognising that all employees are responsible for good safety behaviour. Management of every business or operation is responsible for following the Safety Principles and implementing and maintaining the Minimum Safety Standards. We will set appropriate objectives against which to monitor progress.

I am convinced that this Safety Framework will help us to raise the safety performance of all our businesses up to the standard of the best and, through continuous improvement, enable us to progress towards our ultimate safety goal of zero injuries.

Justin Atkinson
Chief Executive.



THE KELLER SAFETY FRAMEWORK



MINIMUM SAFETY STANDARDS

The Safety Standards on the following pages have been endorsed by the Health, Safety & Environment Committee of Keller Group plc. This is a Committee of the Board chaired by the Chief Executive and on which all the business divisions are represented.

The standards, which are mandatory and apply to all activities in Keller Group businesses, cover:

- Leadership
- Management Systems
- Improvement Plans
- Employee Involvement
- Monitoring & Investigation
- Training
- Annual Auditing

Most of our businesses already have well developed safety management systems and for these businesses, the progress indicators corresponding to each of the Safety Standards will be used as benchmarks against which to assess progress over time.

Where no structured safety management system currently exists or where existing systems are less developed, these Safety Standards will provide the basis for the creation and implementation of a suitable management system, which should be put in place by the end of 2010.

These Safety Standards will be reviewed periodically to ensure that they remain current and valid.

I. LEADERSHIP

Management at all levels is accountable for and shall demonstrate personal responsibility for leading health and safety within their area of responsibility.

PROGRESS INDICATORS

- a) Manager leads their management team in a discussion on the team's safety performance and improvement actions on at least a quarterly basis; typically, this should include:
 - a. injury data and investigation of injuries and near-misses;
 - b. findings of safety audits and visits;
 - c. concerns raised by employees;
 - d. health and safety training; and
 - e. industry safety news.
- b) Manager conducts, and ensures his direct reports conduct, regular site and workshop safety visits.
- c) Manager introduces proactive health and safety objectives in performance evaluation (including his own) and, where appropriate, in recognition/reward programmes.
- d) Manager demonstrates, through his dealings with employees and others, that safety always comes first, even at the expense of productivity and profitability.
- e) Manager addresses safety issues in internal communications, presentations, newsletters, etc.

2. MANAGEMENT SYSTEMS

Every business unit shall (i) have a written health and safety policy and procedures; (ii) employ sufficient safety professional(s) to advise on safety management; and (iii) establish arrangements to communicate safety information and ensure compliance with Minimum Safety Standards.

PROGRESS INDICATORS

- a) Business unit maintains its health and safety policy and procedures, which are formally reviewed at least annually.
- b) Business unit shall demonstrate that employees have received training, including refresher training, covering health and safety policy, procedures, safety rules and the links to disciplinary procedures.
- c) Business unit shall demonstrate that compliance with health and safety policy and procedures (including the safety rules) is checked on a regular basis.
- d) Line management is fully responsible and accountable for safety and shall ensure that sufficient safety professional resources are available to provide the required support for coordination and implementation.
- e) Effective two-way communication about safety is evident in safety committees and managers' meetings with employees.

3. IMPROVEMENT PLANS

Every business unit shall have annual health and safety improvement targets and a formal plan for reducing workplace injuries towards the ultimate goal of zero injuries.

PROGRESS INDICATORS

- a) Business unit has set health and safety targets; and has prepared and implemented a plan for meeting targets, which describes arrangements for:
 - identifying hazards and assessing risks;
 - designing and implementing risk controls;
 - providing resources, including competent personnel;
 - communicating the plan to employees; and
 - monitoring and reviewing progress.
- b) Records confirm that the management team, supervisors and technical staff have been actively involved in preparing the plan.
- c) Records show that employees, or their representatives, have been consulted during the preparation of the plan and their views have been taken into account.
- d) Objectives described in the plan are being achieved within the set timescale.
- e) Safety objectives and targets are integrated into the overall business-planning process.

4. EMPLOYEE AND SUB-CONTRACTOR INVOLVEMENT

Every business unit shall implement arrangements to maximise employees' and sub-contractors' involvement in health and safety.

PROGRESS INDICATORS

- a) Managers ensure that employees and sub-contractors are aware of the business unit's health and safety policy, procedures and improvement plan.
- b) Employees and, where appropriate, sub-contractors attend safety focussed meetings, such as toolbox talks and team talks as a matter of routine.
- c) Records confirm that during the year regular meetings are held with employees and, where appropriate, sub-contractors where health and safety issues and performance are reviewed.
- d) Records confirm that employees and, where appropriate, sub-contractors are involved with safety process review, such as formal risk assessments, as well as designing corrective measures.
- e) Employees and sub-contractors know that they must stop work if they feel it is unsafe to continue.
- f) Managers and supervisors engage proactively with fellow sub-contractors and with main contractors, where there are common issues of safety to consider.

5. MONITORING & INVESTIGATION

Every business unit shall maintain a record of and report all incidents and shall document an investigation into the causes and corrective actions taken for (a) high potential near misses*; and (b) occupational injuries or illness resulting in: (i) fatality; (ii) major injury* or (iii) three days' absence from work (together, "reportable accidents").

*High potential near misses and major injuries as defined in the reporting template.

PROGRESS INDICATORS

- a) Business unit has a documented procedure for investigating, recording and reporting injuries in a timely way. The procedure includes arrangements to identify and record both immediate and underlying causes employing investigative techniques. Managers, supervisors and relevant employees are formally involved in the investigation.
- b) The above procedure also covers the recording of corrective actions and follow-up checks of their effectiveness, including details of the delegation of responsibilities.
- c) Key lessons learned are disseminated in a timely way, not only within the business unit, but across Keller and briefed out appropriately, in accordance with the reporting template.
- d) Investigations are formally reviewed on a regular basis. Corrective actions are taken to address shortcomings and to take account of underlying trends.
- e) Business unit has a documented procedure for recording and investigating high potential near-misses and applying corrective actions.
- f) Business unit's accident reporting and investigation is subject to periodic independent audit.

6. TRAINING

Every business unit shall prepare and implement a documented plan of health and safety training and maintain appropriate records.

PROGRESS INDICATORS

- a) Business unit implements a documented health and safety training plan based on a systematic analysis of training needs and maintains appropriate records.
- b) The above plan describes training provided to new employees and to employees required to perform tasks new to them before they start work.
- c) Records show that formal health and safety training is provided to managers, supervisors and safety professionals.
- d) The provision of training is formally reviewed annually, or more frequently if changes have occurred.

7. AUDITING

Every business unit shall carry out a documented audit of its health and safety arrangements and performance, starting with an initial baseline assessment in 2010 and thereafter at least annual audits. This will include a formal review of observed safety behaviours.

PROGRESS INDICATORS

- a) Records show that the business unit has undertaken a baseline assessment of its health and safety arrangements against a Keller Group plc assessment protocol. The assessment covers the degree to which the Minimum Safety Standards have been implemented and any improvement measures which need to be taken.
- b) Thereafter, on at least an annual basis, the business unit conducts a documented assessment of its health and safety arrangements. This assessment, which is led by a peer from a different business unit, involves managers, supervisors and employees.
- c) Records show that shortcomings identified as a result of previous assessments are corrected.
- e) Managers conduct, and ensure their direct reports conduct, regular site and workshop visits against a schedule, the findings of which are documented. During these visits, managers will observe behaviour, recognising good safety behaviour and correcting poor safety behaviour, as appropriate.
- f) Audit and safety visit recommendations are documented, evaluated and effectively tracked to closure.