

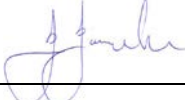



Project HSSE Policy

| | Rev 6 | |
|--------------------------------------|-------------|--|
| Prepared By (QHSSE Management Rep.): | D. Wood |  |
| Checked By (General Manager): | B. Taylor |  |
| Reviewed By (QHSSE Manager): | G. Garricks |  |
| Approved By (Managing Director): | D. Rossiter |  |
| Date: | Jan. 2018 | |
| Issue Status: | For Use | |

Project HSSE Policy

Transcar Projects Ltd is a leading logistic service and shipping organization covering the global and UK markets. Through our integrated network we offer principals and business partners a range of quality services including shipping and airport services, cargo movements and cargo clearance and forwarding.

We recognize that a key factor in being accountable for maintaining the high quality of the service and support we provide to our customers principals and all stakeholders is our firm commitment to HSSE throughout the facilities and locations where we operate.

In line with our commitment to provide safe high quality services throughout our business, we will implement and follow the guiding principles of HSSE as set out below:

- Maintain a management framework, which incorporates, and focuses on HSSE issues in all aspects of our business also including subcontractors and vendors.
- Achieve compliance with the relevant local and/or international HSSE standards and regulations and wherever practicable, identify and establish standards and procedures which reflect international good practice and not knowingly be involved in movement of goods or provide services which are banned under local or international law.
- Work closely as a team with our clients, principals, contractors and vendors to develop services, which reflect operationally and environmentally sound technology thereby enhancing the service, support, performance and overall efficiency.
- In line with IMS-4.4 – Project Security Plan:-
 - Ensure security of cargo, goods and material whilst in storage, during loading and while in transit.
 - Ensure security of personnel engaged in performing the services in support of the Project, in whatever location or format that may be.
- Monitor and manage the work scope and environmental hazards, risks through structured assessment for our business for the benefits of employees, customers, principals, contractors and the local communities in which we operate to reduce and minimize any down time or environmental impact on the services we provide.
- Raise awareness and provide effective guidance and competence training to our staff to assist them in maintaining consistent HSSE standards and adopt best work practice improvement and transfer.
- Regularly review and report on implementation of our HSSE policy and procedures to set and audit processes and establish targets for future improvement in all areas of our business;
- It is our firm belief that HSSE is an equally important overriding business consideration and as such shall as given the appropriate attention.

The role, responsibilities and empowerment to implement this policy lies with Group to Line Management in each of our business areas.

Policy Accountability and Commitment

It is the Company's intention to ensure that employees and contract staff are competent to operate and are focused to work in a safe manner at all times, whether this is at TPL premises, on vessels or other locations.

Implementation of this policy will be a core business requirement of TPL's established operational procedures and will be the responsibility of line management in our operations, supported as appropriate by Senior Management.

Management has a moral and legal duty to establish and maintain appropriate HSSE suitable procedures, high standards and successful Team work on all their premises and work locations. These should cover all permanent employees, sub contractor employees, vendor employees and visitors, whilst at a company managed location(s).

Effective arrangements should exist for open communication awareness, discussion and best practice implementation on HSSE matters at all levels.

Roles and Responsibilities

TPL Board of Directors:

- To determine overall policy and the HSSE Policy Statement
- To co-ordinate activity
- To provide access to specialist resources and necessary funding.
- To audit the performance process procedures and work practice as part of Group Policy and directives.

Regional Executive Directors & Managers:

- To ensure the implementation of Policy in their Region
- To provide management support, guidance and visible leadership.
- To set benchmarks and targets for improvement and enhanced performance results.
- To provide training resources and necessary funding.
- To make decisions on points of conflict.
- To create and maintain good employee morale and Team work.
- To empower employees to Stop work if conditions are unsafe.
- To ensure that safe working practices, procedures, equipment, rules and regulations are adopted and maintained by all persons under their supervision.
- To ensure that the Company complies with all relevant legal requirements and the requirements of vessels, Port Authorities facilities, sites and such like.
- To ensure that all persons under their supervision are adequately trained and aware of any hazards associated with their work as to perform safely.
- To show visible leadership to create good morale Team work and ensure employees are empowered to Stop work if conditions are unsafe.
- To ensure that any accident/incident / injury is fully investigated and any initiated actions are closed out as appropriate.
- To maintain effective communication on process and conduct planned/unplanned audits on HSSE performance and accountability.
- To report incidents and accidents promptly as set out in related procedures.
- To maintain HSSE statistics and records.

Roles and Responsibilities (cont.)

Line Managers:

- To treat safety as number one priority at site(s).
- To supervise, discuss the Policy and implement Procedures as defined by Company line managers on a day-to-day basis.
- To ensure that all employees receive adequate training on the Company business activity and Procedures on HSSE matters.
- To report to line Managers any incidents, accidents, high potential near misses and related corrective actions as taken.
- To work as a Team at all sites and locations.
- To hold prior safety talks focused on the job scope at hand and to ensure maximum persons attend and also actively contribute.
- To support the empowerment policy to Stop work if conditions are unsafe.

Employees & Contractors

- To co-operate with management to enable TPL to comply with any relevant legislation.
- To co-operate with management in the continuing implementation of the EH&S Policy.
- To take overall care of the health and safety of themselves and others.
- To observe all HSSE practices and to conform to all work instructions given to them by line management and supervision.
- To wear protective clothing and equipment as required, and to use appropriate safety devices as instructed and provided by the Company or Client.
- To report any accident, unsafe incident, damage to equipment or spillage of hazardous material to their manager whether persons are injured or not.

Rights of Employees and Contract Staff

- To be provided with a robust safe system and conditions of working.
- To be empowered to not carry out any work in any situation, which they reasonably believe to represent a danger to their safety or that of others in the light of local practice and custom.
- To be empowered to not carry out work or duty instructions, which they believe, would endanger the health or safety of themselves or others.
- To be empowered not to carry out instructions, which they believe, could cause an environmental impact.



Dean Rossiter
Managing Director