



The Lubricant Company

POLICY ON HEALTH AND SAFETY AT WORK / RISK ASSESSMENT

The Management of the TLC Group regards the promotion of Health and Safety measures as a mutual objective for both Management and employees, no matter what their position. It is the Company's policy to comply with the Health and Safety at work etc Act 1974 as required by legislation.

This is the Health and Safety Policy statement of The Lubricant Company.

Our statement of general policy is:

- To provide adequate control of the health and safety risks arising from our work activities.
- To consult with our employees on matters affecting their health and safety.
- To provide and maintain safe plant and equipment.
- To ensure safe handling and use of substances.
- To provide information, instruction and supervision for employees.
- To ensure all employees are competent to do their tasks and give them adequate training.
- To prevent accidents and cases of work-related ill health.
- To maintain safe and healthy working conditions.
- To review and revise this policy as necessary at regular intervals.

Overall and final responsibility for Health and Safety for the TLC (North Division) is that of Mr Andrew Samuel, Managing Director of The Lubricant Company and for TLC (Midlands Division) is Mr George Shand, Managing Director of Highland Fuels Ltd.

Day to day responsibility for safety, risk assessment and ensuring this policy is put into practice is delegated to Dr Helen Abbott, Technical Services Manager (North team) and Mr Gregg Collingham, Divisional Manager (Midlands team) with assistance from the site representatives Mr Simon Campbell (North team) and Mr Simon Parkes (Midlands team).

All employees have to:

- Co-operate with supervisors and managers on health and safety matters.
- Not interfere with anything provided to safeguard their health and safety.
- Take reasonable care of their health and safety.
- Report all health and safety matters to the person responsible for health and safety in their team.
Employees are encouraged to discuss health and safety matters at any time and these matters can be discussed at team meetings and management meetings.

The TLC Group seeks to ensure these objectives as follows:-

1. the maintenance of a safe and healthy working environment and premises with proper amenities for all its employees as far as practicable;
2. the establishment and maintenance of safe plant and equipment to recognised standards;
3. the continuance of the updating of safe practices and procedures for the operation of plant and material handling;
4. to identify and advise employees of potential hazards to health from products or equipment;
5. the Group expects all employees on their part to recognise that they have an equally clear duty to take every reasonable precaution to avoid injury to themselves, their colleagues and members of the public; for example, by the wearing of protective clothing provided, following operating procedures and recommendations, prompt reporting of accidents and potential hazards and the observance of personal hygiene; effective accident prevention and environmental protection depends upon attitudes at all levels of employment;
6. risks are assessed by competent staff within the Safety Rules, and also specific risks are assessed including the use of VDUs, manual handling, COSHH assessments, electrical safety, fire safety and mobile phones. These must be reported to Helen Abbott/Gregg Collingham who will be responsible for ensuring the action required is implemented and will check that the implemented actions have removed/reduced the risks. Risk

assessments will be reviewed annually or whenever the work activity changes, whichever is soonest;

7. the Group will supply all operational staff with the necessary protective clothing and footwear required to permit them to perform their duties without hazard to themselves;
8. all company car drivers must ensure that their vehicles are roadworthy and are maintained and serviced according to the lease arrangements. A visual check of the vehicle (tyres, windows, light glasses) should be made before each journey to ensure the vehicle is fit for use. Staff must ensure they take adequate rest breaks on long journeys to avoid falling asleep whilst driving. Company car drivers must send a copy of their driving licence to their office annually and must inform TLC of any endorsements etc. to their licence which may affect their ability to drive;
9. it is not permissible to use hand held mobile phones whilst driving on company business. Staff must not make calls whilst driving and should minimise the use of "hands free" phone calls. Find a suitable place to stop, if possible, to reply to messages or wait until the end of the journey to return phone calls;
10. arrangements shall be made for adequate PAT testing at Inverness and Nottingham;
11. the Group will take responsible steps to ensure that Contractors working within the plant and office areas shall do so within the framework of the Health and Safety at Work Act, and the Company Safety Rules;
12. the necessary First aid equipment is available at Divisional offices and driving staff also have kits available on their vehicles;
13. the attention of all employees is drawn to the posted emergency notices regarding the procedures to follow in the event of a fire; Fire Training sessions and Drills are carried out under the umbrella of the landlords of the Divisional offices;
14. publicity on all aspects of Safety is made available to employees by means of posters, stickers and other visual aids prominently displayed on notice boards and elsewhere;
15. the Group will discuss and resolve matters on Health and Safety at Work with employees and issues arising, and changed circumstances will be covered under the Management Review meetings which will meet on a regular basis;
16. Management shall make sufficient resource available for health and safety including budgets for PPE and appropriate training.

This Policy is a statement of the Company's intent and commitment. It is not all encompassing and shall be subject to annual review, revision and development as necessary. It is the duty of all employees to co-operate with Management in the implementation of the Act and current legislation.

Signed: Andrew Samuel A Samuel, Managing Director, The Lubricant Company Ltd

Date 30/09/09

Signed George Shand G.Shand, Managing Director, Highland Fuels Ltd

Date 30/09/09