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2iM Group (International Industrial Metals Ltd)

Integrated Management System

Integrated Management System Manual

Revision 3

Issued 01 October 2019

Conforms to ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018

This Manual has been issued on the authority of the Managing Director for the use of all staff, subcontractors, clients or regulatory bodies to whom International Industrial Metals Ltd. may be required to provide such information.

Carl Green
Managing Director
EnviroWales Ltd

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Integrated Health, Safety, Environmental and Quality Policy

All 2im Group companies at the Rassau site operate under the Integrated Management System (IMS) that conforms to the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 so that we can maintain a consistently high quality in all the work we undertake. Our management system shares joint policies to ensure that the strategic directions of all companies are aligned and that Health, Safety, Environmental and Quality (HSEQ) policies are compatible.

Our management system ensures that proper communication, work control and accountable records are generated for all work undertaken. The Management Team will show leadership and commitment, and bear the responsibility for establishing, implementing, integrating and maintaining the IMS. We undertake to ensure sufficient resources are made available within the Organisation to achieve this.

All companies are totally committed to setting and achieving HSEQ standards that are capable of meeting the specified requirements of our interested parties and ensuring their satisfaction with our performance, whilst committing to compliance with relevant legislation and other requirements to which the company subscribes.

Safety, quality and environmental compliance are the responsibility of everyone, in every activity, throughout the companies. All staff under our control are responsible for promoting these aims and are required to familiarise themselves with the contents of the manual, which has been established and adopted as the means for achieving these declared objectives. Everyone connected with the companies is supported according to their individual needs for personal development, training and facilities.

We believe in demonstrating our commitment to continual improvement through the establishment and monitoring of key performance indicators and the implementation of our IMS.

Specifically we will:

- Provide and maintain safe plant and equipment and make provision for dealing with all emergency situations on site.
- Operate our processes and conduct our activities in a manner which protects the environment and the health, safety and wellbeing of our customers, our employees and the community in which we operate.
- Include quality, environmental and health and safety considerations in existing management systems and initiatives with the aim of improving our management processes, our environmental, health and safety performance and customer satisfaction.
- Implement systems to review and monitor performance, liaising with outside bodies where relevant, in order to achieve or exceed annually set objectives and targets which will ensure continual improvement. The process of setting and reviewing objectives and targets is included in management review meetings.
- Continuously strive to control the release of harmful substances to the environment, avoid the wasteful use of natural resources, energy and materials and be pro-active in minimising waste.
- Discuss quality, environmental and health & safety issues regularly at the highest levels of the company and consult with our employees, the relevant authorities and community organisations, as appropriate, on HSEQ related matters.
- Ensure available access to quality, environmental and health & safety information and training for our staff, encouraging them to apply good practice at all times.
- Require contractors to work on site in a manner that complies with this policy and encourage responsible environmental management with suppliers and customers.
- Communicate this policy to all persons working for EnviroWales and Jamestown with the intent that they are made aware of their HSEQ obligations.

This policy is also publicly available on the website, will be displayed on notice boards and is available on the company intranet. It will be reviewed at least annually. Any queries or comments may be addressed to me or members of the management team.



Carl Green
Managing Director.

Version 2
01/10/2019

0.1 Major Accident Prevention Policy (MAPP) for EnviroWales Ltd

1. This Major Accident Prevention Policy (MAPP) has been produced by EnviroWales Ltd, to comply with Regulation 7 and Schedule 2 of The Control of Major Accident Hazards Regulations (COMAH) 2015.
2. EnviroWales is an Upper Tier site by virtue of the substances stored and processed on site, which are classified as Dangerous Substances in Schedule 1 of COMAH (E1 Hazardous to the Aquatic Environment) and which exceed a defined threshold.
3. EnviroWales is committed to ensuring a high level of protection for human health and the environment. The Board will demonstrate its commitment by
 - Providing Process Safety Leadership at Executive Level.
 - Ensuring the development of a good Safety Culture.
 - Providing adequate resource for the development and implementation of an appropriate Safety Management System (SMS).
 - Ensuring that principles of continuous improvement become embedded at all levels in the organisation.
 - Ensuring the implementation of and ongoing compliance with ISO 45001:2018 and ISO 14001:2015.
4. To ensure the development and implementation of an appropriate SMS, we have considered carefully, and used external expertise when appropriate:
 - The hazard, risk, nature and complexity of our processes.
 - The potential for harm to our employees, contractors, the natural and built environment.
 - The internal and external issues which may affect
 - The relevant needs and expectations of workers and other interested parties.
 - The requirements placed upon us by local and international law.
5. From these considerations we have produced Safety Management System elements which we believe is appropriate to ensure a high level of inherent safety as well as prevention, control and mitigation for our Major Accident Hazards.
6. EnviroWales has committed to the adoption and compliance to the ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 standards to enable it to achieve high standards on quality, the environment and occupational health and safety. To ensure we also achieve high standards for COMAH Process Safety, we have followed the guidance set out in Guidance to COMAH 2015 for Regulation 7 and best practice models such as those developed by the Energy Institute (EI) and the Centre for Chemical Process Safety (CCPS). Where possible, we have integrated our Management Systems and these are sometimes referred to in our supporting documentation.

Safety Management System Elements

There are 11 Safety Management System elements and these cover the requirements of Schedule 2 of COMAH 2015, namely

- Organisation and Personnel
- Identification and Evaluation of Major Hazards
- Operational Control
- Management of Change
- Planning for Emergencies
- Monitoring Performance
- Audit and Review

Element 1: Leadership, Commitment, Responsibility and Workforce Involvement

The EnviroWales Directors will visibly demonstrate commitment to Process Safety by:

- (i) Ensuring senior managers (including non-technical managers) attend an in-house 1 day training course on Process Safety Leadership.
- (ii) Ensuring Process Safety is regularly discussed at senior management team meetings: an Improvement Plan has been produced, prioritised and resourced.
- (iii) Assigning a Key Performance Indicators (KPI) to achieve continuous improvement. The responsibility for achieving the objective is assigned to a member of the management team, typically the department head or a person with suitable influence to deliver the required outcome.
- (iv) Promoting the development of a positive safety. Directors lead by example e.g. by wearing the correct PPE and following safety procedures.
- (v) Senior Managers regularly undertake health and safety shop floor audits and employees are encouraged to raise concerns.
- (vi) Providing mechanisms, time, training and resources necessary for employee consultation and participation.
- (vii) Ensuring the required health and safety information is communicated to workers and other interested parties.
- (viii) Promoting a co-operative working relationship, with effective communication, with employees and other key stakeholders such as the Regulatory Authorities.
- (ix) Continued membership of The International Lead Association (ILA). This is an opportunity to share best practice and benchmark our performance within the industry.
- (x) This element is monitored, audited, reviewed and continually improved as per Elements 9, 10 and 11.

This is based on good practice defined in OECD Guidance on Corporate Governance for Process Safety or the HSE Guidance on Leadership for Major Hazard industries

SUPPORTING DOCUMENTATION

IMS Manual Section 5.1	– Leadership and Commitment.
IMS Manual Section 5.2	– Integrated EHSQ Policy.
IMS Manual Section 5.3	– Organizational Roles Responsibilities and Authorities.
IMS Manual Section 5.4	– Consultation and Worker participation.
IMS Manual Section 7.4	– Communication.
IMS Manual Section 6.2	- EHSQ Objectives and planning to achieve them.

Element 2: Training and Competency

EnviroWales will ensure that all staff are competent

- (i) EnviroWales are in the process of developing a Competence Management System in line with HSE guidance
- (ii) Initially EnviroWales analysed all tasks to identify training/competence requirements and supporting operating procedures
- (iii) In light of the environmental risk assessment we have placed extra emphasis on emergency response training.
- (iv) EnviroWales check the competence of our Contractors for the tasks they are required to undertake and this is part of our Control of Contractors procedure
- (v) This element is monitored, audited, reviewed and continually improved as per Elements 9, 10 and 11.

SUPPORTING DOCUMENTATION

IMS Manual Section 7.2	– Competence.
IMS Manual Section 8.1.4.3	– Outsourced Processes.
IMS Manual Section 8.4	– Control of Externally Provided Processes, Products and Service
IMS Procedure 8.1.2.4 b	– Contractors Agreement
EnviroWales Company Handbook Appendix 2	– Disciplinary Process
EnviroWales Recruitment process	
Task analyses	
Emergency response training needs assessment	

Element 3: Identification & Evaluation of Major Hazards

EnviroWales will assess and regularly review the probability and severity of potential major hazards that could occur as a result of the Company's processes.

- (i) COMAH critical elements have been identified for the safe running of the plant. This includes People, Plant, Processes & Procedures
- (ii) Process area risk assessments have been completed
- (iii) The potential for Major Accidents to the Environment have been assessed and the protective measures put in place to prevent or mitigate them
- (iv) EnviroWales will use competent people to assess major hazards, from our own staff or from appropriate external expertise.
- (v) EnviroWales will use appropriate hazard identification and evaluation techniques commensurate with overall site risk.
- (vi) This element is monitored, audited, reviewed and continually improved as per Elements 9, 10 and 11.

SUPPORTING DOCUMENTATION

Phase 1b COMAH Environmental Risk Assessment
Zones 1 - 14 Area Risk assessments
HAZOP studies
IMS Manual Section 6.1.2– Hazard Identification and assessment of risks.
IMS Manual Section 8.1.2– Eliminating Hazards and minimising OHS risks

Element 4: Operational Control and Instructions

EnviroWales has written safe working methods (SWMs) for activities that take place on site that are clear, concise and understood by those who use them.

- (i) SWMs are developed and regularly reviewed by both operational staff and the management team to ensure their applicability and usability
- (ii) An electronic document management system provides version control and is accessible to all staff that need it.
- (iii) New or changed instructions are communicated effectively
- (iv) Safety critical activities are appropriately highlighted
- (v) This element is monitored, audited, reviewed and continually improved as per Elements 9, 10 and 11.

SUPPORTING DOCUMENTATION

IMS Manual Section 8.1 – Operational planning and control.

Element 5: Permit to Work

For non-routine activities a Permit to Work system is used which was developed in line with HSG250. The system was developed by a team of senior and operational managers to ensure an appropriate procedure was introduced.

- (i) EnviroWales has established and maintained appropriate procedures for all work done under the permit-to-work system
- (ii) Arrangements have been made for the workforce to be made aware of the permits and systems, and they are trained in their operation
- (iii) EnviroWales monitors the permit-to-work system to ensure that it is effective and correctly applied
- (iv) The permit-to-work system is audited and reviewed;
- (v) Copies of permits are kept for a specified period to enable auditing or incident investigation
- (vi) EnviroWales management ensures sufficient resources are provided to enable the permit-to-work system to be properly implemented.
- (vii) This element is monitored, audited, reviewed and continually improved as per Elements 9, 10 and 11.

SUPPORTING DOCUMENTATION

E-EP-085 Permit to Work Procedure

Element 6: Inspection and Maintenance

EnviroWales will inspect and maintain assets according to OEM stipulations and will generate a register of safety and environmentally critical equipment. Planned preventative maintenance schedules are generated and there is a process for logging faults and defects.

Completed work schedules are held electronically for periodic review to ensure fault trends are identified and to ensure continued effectiveness of the system.

SUPPORTING DOCUMENTATION

COMAH critical equipment identification on CMMS.

IMS Manual Section 7.1.3 – Preventative maintenance.

Element 7: Emergency Response

EnviroWales has internal and in the future external emergency plans in place

- (i) EnviroWales will put in place and keep up to date an internal Emergency Plan and response requirements
- (ii) The Emergency Plan will focus on the environmental major accident hazards identified in Report (Phase 1b ref)
- (iii) The Plan will clearly allocate roles and responsibilities
- (iv) The Plan has clearly defined arrangements for warning , alert and communication
- (v) All those with roles and responsibilities will be trained and competent – see Element 2
- (vi) The Plan will be tested, reviewed and revised where necessary at least every 3 years
- (vii) Emergency response equipment is inspected and maintained – see Element 6
- (viii) This element is monitored, audited, reviewed and continually improved as per Elements 9, 10 and 11.

SUPPORTING DOCUMENTATION

IMS Manual Section 8.2 – Emergency Preparedness & Response

Element 8: Design Modifications and Management of Change

Where assets are newly installed or substantially modified from their original design EnviroWales will use a Management of Change process to ensure the modification or new equipment does not contribute to a major accident.

- (i) Changes are risk assessed to ensure there is no detrimental effect on health, safety, the environment or quality of products
- (ii) The assessment is reviewed and approved by the Senior Management Team (Managing Director, Process Director, EHS Director and Engineering Manager) before changes can be made.
- (iii) This element is monitored, audited, reviewed and continually improved as per Elements 9, 10 and 11.

SUPPORTING DOCUMENTATION

IMS Manual Section 8.1.3 – Management of change.

E-QP-155 Plant / Process Change Control

Element 9: Evaluation of Legal Compliance

Legal compliance is considered to be a minimum level of performance by the company and a culture of continuous improvement exists within the management team that seeks to improve performance against those constraints in an effort to achieve high standards of process safety and prevent environmental disasters.

Legal obligations under COMAH 2015, the Health and Safety at Work Act 1974 and the Environmental Permitting Regulations 2016 are communicated to all employees and regularly discussed by the management team in detail as a means of performance indication.

Updates to legislative changes, technical standards and management practices are covered as a central part of the Integrated Management activities of the site:-

The Organization shall ensure that:

- Legal requirements applicable to all Process Safety, occupational health and safety and environmental aspects of its activities, products, and services are determined.
- All affected employees have access to and clearly understand legal requirements.
- Compliance with all relevant Process Safety, occupational health and safety and environmental legislation and regulations is evaluated periodically.
- Applicable non-regulatory requirements are also determined. These can include items such as industry codes and standards, voluntary initiatives and guidelines, and so forth. This information is obtained via communication from the Regulatory Authorities, professional bodies, the International Lead Association as well as the emergency services and the local authority.
- Where necessary, external expertise will be sought to achieve the aims of this element of the SMS.

SUPPORTING DOCUMENTATION

IMS Manual Section 6.1.3 – Determination of legal and other requirements
IMS Manual Section 9.1.2 – Evaluation of Compliance

Element 10: Investigation, Monitoring, Audit and Review

EnviroWales is committed to fully investigating personal and process safety, accidents, incidents and near misses in order to identify root causes to prevent reoccurrence and reduce risk.

- (i) Audits are planned on a risk basis and carried out by trained staff.
- (ii) Accidents, incidents and near misses will be fully investigated and root causes identified in order to avoid a repeat occurrence
- (iii) The effectiveness of our systems will be checked through both formal auditing and informal safety tours by the management team.

SUPPORTING DOCUMENTATION

E-EP-055 Accident, Incident & Near Miss Investigation procedure
IMS Manual Section 9.2 – Internal Audit
IMS Manual Section 9.3 – Management review.
IMS Manual Section 10.2 – Incident, Nonconformity and corrective action.

Element 11: Continuous Improvement

EnviroWales aims to achieve continuous improvement in the management of our COMAH major accidents and accidents to the environment through the setting and monitoring of key Process Safety Performance Indicators (PSPIs), other target setting and performance measurement. Lessons learnt from past accidents, incidents and near misses are communicated at all relevant levels in the organisation.

SUPPORTING DOCUMENTATION

IMS Manual Section 10.2 – Nonconformity and Corrective Action
IMS Manual Section 10.3 – Continual Improvement
E-QP-155 Plant / Process Change Control

Statement of management commitment

We confirm our commitment and that of our senior management team to the successful implementation of this policy through the provision and effective utilisation of the necessary resources and to regular documented reviews of its effectiveness and suitability.

Carl Green
Managing Director
Envirowales Ltd.

Brian Kelly
EHS Director
Envirowales Ltd.

Chris Kneen
Process Director
Envirowales Ltd.

Welcome to International Industrial Metals Ltd

EnviroWales Ltd., Jamestown Industries Ltd., Jamestown Metals Ltd. and Royston Lead Ltd. are members of the 2iM group situated on adjacent sites in Ebbw Vale and under the control of the same management team. EnviroWales Ltd. produces lead alloys in various forms, technical grade sodium sulphate and granulated polypropylene all predominantly derived from recycled lead-acid batteries. Envirowales supplies Jamestown Industries with lead slabs which are rolled into lead sheet. Royston Lead Ltd specializes in the production of cast lead sheet whilst Associated Lead Mills Ltd. And Jamestown Metals distribute metal products and accessories to the building trade. The interdependency of the companies necessitates a concerted approach when considering risk.

Envirowales Limited is an industry-leading, lead acid battery recycling plant located in Ebbw Vale, South Wales. Our aim is to recycle as many of the constituent parts of the battery as possible. Currently we are achieving a recycling efficiency of over 95% and are continuing to work to increase this figure.

Lead enjoys one of the highest recycling rates in the world, with an estimated 50% annual worldwide consumption being satisfied by recycled material. It will continue to play its part for the environment, with the use of lead in electric vehicles becoming more prominent. In fact, 80% of the lead produced worldwide is used for batteries, 6% for building products and the rest used for smaller applications such as shielding, ballast etc.

Recycling of lead requires only around one third of the energy needed to produce lead from its ores, resulting in major energy savings and fewer carbon emissions.

Besides lead alloys, which are sold throughout Europe mainly in the manufacture of building products, the plant produces two other products; sodium sulphate, used in washing powder and animal feeds and secondly, polypropylene which is further recycled to produce a variety of products.

Our Vision

For the Rassau site to become the technical centre of excellence within the **2iM group** and the leading recycler of lead acid batteries in the UK by providing a range of high quality lead products and technical services to satisfy both internal and external customers.

Our Mission

To remove potentially hazardous scrap lead acid batteries from the environment and recycle them using industry leading equipment and best available techniques to produce a range of high value products with no end of life legacy.

Our Values

The management team have come together from diverse backgrounds and as such bring a broad range of varied experiences and a willingness to learn and innovate. We believe in a flat management structure where staff development is encouraged. We consider lead to be one of the most environmentally sustainable products available on the market and are committed to working closely with our strategic partners and regulatory authorities to ensure the continued growth of the business.

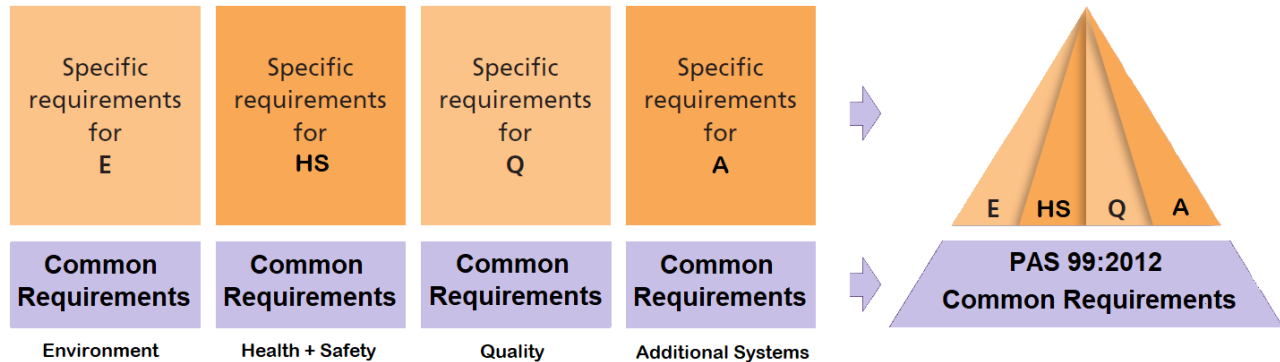
Strategic Direction

The sustainability of lead acid batteries as a feedstock is assured for the foreseeable future as it is the technology of choice for a number of applications, including the automotive industry. Plans are currently being developed for increases in both smelting and refining capacity. The refinery expansion is aimed at diversifying our product range to allow for seasonal fluctuations in the lead roofing industry and to maximize the value recovered from recycling battery scrap by producing separate antimony and tin rich product streams.

About The Integrated Manual

This manual is prepared for the purpose of defining the companies' interpretations of the ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 international standards, as well as to demonstrate how the companies comply with those standards and their legal obligations including the Control of Major Accident Hazards Regulations (COMAH) 2015.

This manual is based on PAS 99:2012 and approximately follows the high level structure from Annex SL.



Where possible, clauses will be addressed with a common approach which is compliant with all standards e.g.

5.3 – Organizational roles and responsibilities.

Where clause numbering conflict exists clause numbers will be duplicated with letters signifying the relevant standards as in the examples below:

8.2 – EHS Emergency Preparedness and Response

8.2 – Q Requirements for products and services

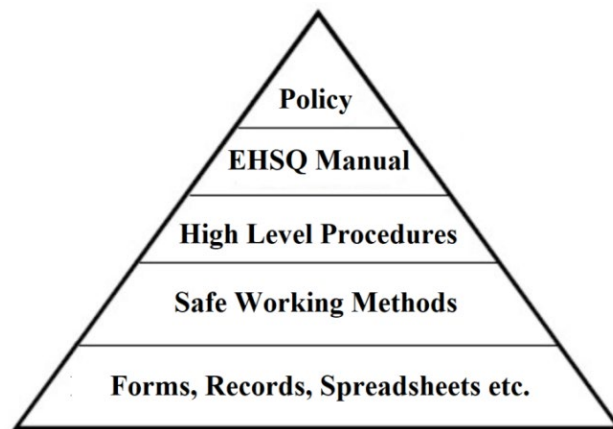
This manual presents “Notes” which are used to define how the companies have tailored its management system to suit its purposes. These are intended to clarify implementation approaches and interpretations for concepts which are not otherwise clearly defined in the ISO standards. *Notes appear in italics, with grey background.*

Where subordinate or supporting documentation is reference in this manual, these are indicated by ***bold italics***.

The Integrated Health, Safety, Environmental and Quality Policy provides the first level of the site’s Integrated Management System, outlining our **commitments** as an Organization. This manual expands upon these commitments and provides a roadmap for compliance and performance. This is translated into and effectively actioned through the system’s third level of high level procedures showing **what** we do as a plant. The safe working methods / work instructions in the fourth level of the system provides more detailed documentation showing **how** we carry these things out in practice, whilst the records in the fifth level show how we evidence the actions we have undertaken.

The Integrated Management System is, in effect, the EHSQ Statement of International Industrial Metals Ltd. An EHSQ Statement is a documented programme for safeguarding the health and safety of employees while they work and reducing the environmental impact of our operations while improving EHS performance and customer satisfaction against known criteria, legal obligations and agreed targets and objectives.

An illustration of the Integrated Management System can be made as below:



Terms and Definitions

The companies adopt the following terms and definitions within its Integrated Management System (IMS). Where no definition is provided, the companies typically adopt the definitions provided in **ISO 9000: Quality Management – Fundamentals and Vocabulary**. In some cases, specific procedures or documentation may provide a different definition to be used in the context of that document; in such cases, the definition will supersede those provided for in this Quality Manual or ISO 9000.

General Terminology

The Companies	-	All members of the 2iM group at the Rassau Site.
ALM	-	Associated Lead Mills Limited.
EnviroWales	-	EnviroWales Limited.
JIL	-	Jamestown Industries Limited.
JML	-	Jamestown Metals Limited.
Royston Lead	-	Royston Lead Limited.
Document	-	written information used to describe how an activity is done.
Record	-	captured evidence of an activity having been done.

Risk-Based Thinking Terminology

Risk – Negative effect of uncertainty.

Opportunity – Positive effect of uncertainty.

Uncertainty - A deficiency of information related to understanding or knowledge of an event, its consequence, or likelihood. (Not to be confused with measurement uncertainty).

Nonconforming Product Terminology

Rework: Efforts to bring nonconforming product into conformance through additional operations that do not alter the original design of the product.

Repair: Efforts to bring nonconforming product into conformance through additional operations that alter the original design of the product; this may be through the addition of material not specified in the original design, or through altering pre-existing design features.

Scrap: The discard of nonconforming product in lieu of rework or repair.

Definitions

CCL	Climate Change Levy	MATTE	Major Accident To The Environment
CLAW	The Control of Lead at Work Regulations 2003	OHS	Occupational Health & Safety
EMS Log	Database containing environmental concerns / actions	OJT	On the Job Training
EPR	Environmental Permitting Regulations	PPE	Personal Protective Equipment
ERT	Emergency Response Team	Safety Log	Database containing safety concerns / actions
LIA	Lead In Air	TCIR	Total Case Incident Rate
LIB	Lead In Blood	UAR	Unauthorised/fugitive release
LWCAIR	Lost Work Case Away Incident Rate		

Context of the Organization

4.1 Understanding the Organization and Its Context

The organization has committed to the adoption and compliance to the ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 standards. These International Standards help the organization achieve the intended outcomes of its integrated management system, which provide value for the environment, the organization itself and interested parties. Consistent with the organization's integrated policy, the intended outcomes of the management system include:

- Providing a framework for an HSEQ management.
- Prevention of work-related injury and ill-health.
- Provision of safe and healthy workplaces.
- Enhancement of environmental performance
- Enhancement of Customer Satisfaction
- Improvement of process efficiency and the minimization of waste.
- Fulfilment of compliance obligations
- Achievement of HSEQ objectives.

The organization has reviewed and analysed key aspects of itself and its stakeholders to determine the strategic direction of the company and its HSEQ objectives. This procedure is outlined in **6.2 HSEQ Objectives and planning to achieve them**. This requires understanding internal and external issues that are of concern to the companies and their interested parties (per 4.2 below) and include environmental conditions being affected by or Capable of affecting the organization; these issues are identified per the document **4.1 - Risk and Opportunity Management**. Such issues are monitored and updated as appropriate, and discussed as part of management reviews.

4.2 Understanding the Needs and Expectations of Workers and Interested Parties

The issues determined per 4.1 above are identified through an analysis of risks facing The organization and its interested parties. "Interested parties" are those stakeholders who receive our products, or who may be impacted by them, or those parties who may otherwise have a significant interest in our company. These parties are identified per the document **4.2 – Workers and Interested Parties**.

This information is then used by senior management to determine the company's strategic direction. This is defined in records of management review, and periodically updated as conditions and situations change.

4.3 Determining the Scope of the Integrated Management System

The integrated sections of the management system and all sections relating to EHS management apply to all processes, activities and employees within the companies.

Based on an analysis of the issues of concern raised in 4.1 and 4.2; the interests of stakeholders; the organizational units, functions and physical boundaries of the above named sites; and in consideration of its products and services, the companies have determined the scope of the relevant sections of the quality management system as follows:

“The recovery of lead bullion from lead-acid batteries through battery breaking and smelting, the refining of lead bullion and lead scrap to lead alloys of required specifications, the production storage and sale of lead alloy slabs, blocks and sheet, the production of technical grade sodium sulphate and the production of washed and granulated polypropylene”.

The following clauses of ISO 9001:2015 were determined to be not applicable to the companies.

8.3 – Design and Development. As products are manufactured to customer specification and BS EN 12588:2006 requirements regarding chemical composition, the company has no design and development input or output with respect to its products. This section is therefore not applicable to The companies’ business.

8.5.1.f – Validation of processes for production and service provision. The companies have no processes in production or service provision where the output cannot be verified by subsequent monitoring or measuring, either by 100% inspection or by statistical sampling. This section is therefore not applicable to The companies’ business.

There are no elements of the *ISO14001* or *ISO45001* standards that are deemed not applicable to the business.

4.3 - E Authority and the ability to exercise control and influence

Full authority and ability to control is possible over our production sites in Ebbw Vale, and a strong authority and ability to influence over our outsourced services. We have a strong authority and great ability to influence our suppliers’ environmental performance and social responsibility policies. We have moderate authority and considerable ability to influence the environmental performance policies of our customers within the 2im group. However, our current levels of influence over our external customer’s environmental policies are not high. Finally, we have no authority and marginal ability to influence the final disposal of our product.

4.4 Integrated Management System and Its Processes

4.4.1 Process Identification

The companies have adopted a process approach for its management system. By identifying the top-level processes within the company, and then managing each of these discretely, this reduces the potential for nonconforming products discovered during final processes or after delivery. Instead, nonconformities and risks are identified in real time, by actions taken within each of the top-level processes. Our processes and procedures are identified alphanumerically according to the following pattern:

- CP-xxx Core Process
- SP-xxx Support Process
- IP-xxx Integrated Procedure (common to all Three Standards)
- EP-xxx Environmental Procedure
- HS-xxx Occupational Health and Safety Procedure
- QP-xxx Quality Procedure
- I-AP-xxx Integrated Procedure Appendices (common to all Three Standards)
- E-AP-xxx Environmental Procedure Appendices
- HS-AP-xxx Occupational Health and Safety Procedure Appendices
- Q-AP-xxx Quality Procedure Appendices

Note: not all activities are considered “processes” – the term “process” in this context indicates the activity has been elevated to a higher level of control and management oversight. The controls indicated herein are applicable only to the top-level processes identified.

The following top-level processes have been identified for the companies:

CBP-01 CORE BUSINESS PROCESS

CP-01 Sales Process

- 8.2.2 Q Customer Enquiries.
- QP-005 Termed Contracts
- QP-010 Customer Credit Control
- QP-015 Works Order Preparation
- QP-020 Production Planning
- CP-02 Purchasing Process
- IP-025 Supplier Assessment
- IP-030 Purchasing
- IP-035 Supplier Monitoring

CP-03 Goods Inwards Process

- QP-040 Goods Receipt
- QP-045 Return or Re-grading of Nonconforming Purchased Goods

CP04 Production Process

- QP-055 Battery Breaking
- QP-060 Battery Paste Desulphurisation
- QP-065 Battery Paste Filtration
- QP-070 Sodium Sulphate Treatment
- QP-075 Sodium Sulphate Crystallisation
- QP-080 Polypropylene Processing
- QP-085 Lead Smelting
- QP-090 Lead melting
- QP-095 Lead Refining
- QP-100 Metal Samples
- QP-105 Liquid Metal Sampling
- QP-110 Slab and Block Casting
- QP-115 Batch Sheet Casting – Sandcasting Method
- QP-120 Continuous Sheet Casting – Direct Method (DM)
- QP-125 Mill Rolling
- QP-130 Finishing Line
- QP-135 Tile Stamping
- QP-140 Packaging Pallets
- QP-145 Inspection and Test Status
- QP-150 Handling and Storage of Product
- QP-155 Control of Damaged Material
- QP-160 Order Picking
- QP-165 Despatch
- QP-170 Customer Returns

SP-01 BUSINESS MANAGEMENT PROCESS

- 9.3 - Management Review.

SP-02 HUMAN RESOURCE PROCESS

- 7.2 - Training and Competence
- 7.4 - Communication

SP-03 SYSTEM MANAGEMENT PROCESS

- 8.5.2 Q - Identification of Material Batches
- 8.5.3 Q - Control of Third-Party Property.
- 8.5.6 - Plant & Process Change Control
- 8.7 - Control of Nonconforming Product
- 9.1.2 - Evaluation of compliance
- 9.1.3 - Analysis and Evaluation
- 9.2.1 - Internal Audits.
- 9.2.2 - Internal Audit Programme.
- 10.2 - Corrective and Preventive Action

SP-04 IT SUPPORT / DOCUMENT AND RECORD CONTROL

- 7.5.1 - Issue and Control of Documents.
- 9.2.1 - Internal Audits.
- 9.2.2 - Internal Audit Programme

SP-05 MAINTENANCE

- 7.1.3 - Preventive Maintenance.
- 8.5.3 Q - Control of Third-Party Property.

SP-06 LABORATORY

- 7.1.5 - Control of Test Equipment Calibration.

Each Procedure may be supported by other activities, e.g. Safe Working Methods. Procedures reference Safe Working Methods (SWMs) that are identified as follows:

- BB-SWM-XXX Battery Breaker SWMs
- DM-SWM-XXX DM Method SWMs
- ENG-SWM-XXX Engineering SWMs
- LAB-SWM-XXX Laboratory SWMs
- PP-SWM-XXX Polypropylene Plant
- MILL- SWM-XXX Mill SWMs
- RF-SWM-XXX Refinery SWMs
- SC-SWM-XXX Sandcaster SWMs
- SM-SWM-XXX Smelter SWMs
- TS-SWM-XXX Tile Stamper SWMs

Monitoring and control of Quality Procedures ensures effective implementation and control of all subordinate tasks or sub-processes.

Each Procedure has a related document which defines:

- applicable inputs and outputs
- process owner(s)
- applicable responsibilities and authorities
- applicable risks and opportunities
- critical and supporting resources
- criteria and methods employed to ensure the effectiveness of the process
- quality objectives related to that process

The sequence of interaction of these processes is illustrated in Appendix A.

Note: Appendix C represents the typical sequence of processes, and may be altered depending on customer or regulatory requirements at the job or contract level, as needed.

4.4.2 Process Controls & Objectives

Each Process has at least one objective established for it; this is a statement of the intent of the process. Each objective is then supported by at least one “metric” or key performance indicator (KPI) which is then measured to determine the process’ ability to meet the quality objective.

Note: some processes have multiple objectives and multiple metrics. This is determined by the nature of the process, it’s impact on products, and associated risks.

Note: Whereas ISO 9001 discusses process measurements and “quality objectives” as separate concepts, the companies combine them; i.e., quality objectives are used to control the processes. Additional objectives for products may be assigned, but these will also be used to measure process effectiveness.

Throughout the year, metrics data is measured and gathered by process owners or other assigned managers, in order to present the data to Senior Management Team. The data is then analysed by Senior Management Team in order that Senior Management Team may set goals and make adjustments for the purposes of long-term continual improvement.

The objectives for each process are defined in the Procedure Document(s) that pertain.

Metrics, along with current standings and goals for each objective, are recorded in records of management review.

When a process does not meet a goal, or an unexpected problem is encountered with a process, the corrective and preventive action process is implemented to research and resolve the issue. In addition, opportunities for improvement are sought and implemented, for the identified processes.

Leadership

5.1 Leadership & Commitment

The *Integrated Health, Safety, Environmental and Quality Policy* & the MAPP policy (as shown at the beginning of this manual) are endorsed by the Managing Director. The commitments identified in them are achievable and measurable. The policies are considered when the plant sets HSEQ objectives and business plans.

The policies will be made available to any interested party and are displayed at prominent positions within the Organization. They are further communicated to employees via Employee Induction Training.

The Quality and Process Services Manager assumes overall responsibility of the HSEQ system.

All managers are fully committed to HSEQ and take responsibility for compliance to this documented system within all areas of the Organization. HSEQ performance and related issues are reviewed at the daily Management meeting.

Safety and Environmental concerns and issues may be entered onto the Organization’s HSEQ database which is monitored daily by the EHS department. Each item is assigned to a senior manager who ensures appropriate close-out.

The plant Management Team promotes a positive HSEQ culture of the plant’s operations. This team demonstrates its commitment to HSEQ in a number of ways, including:

- Development and maintenance of an effective Integrated Management System.
- Ensuring HSEQ performance against objectives and targets is reviewed during management review meetings.
- Ensuring appropriate decisions are made regarding corrective actions that are planned and implemented as necessary, including any resource considerations.
- Ensuring employees are encouraged to play an active role in the Integrated Management system. The plant has an EHS Committee, which includes representatives from hourly paid employees, as well as Management representatives. In addition, the plant has a number of process improvement teams for areas such as emergency response, risk assessment and environmental impact reduction.

5.1.1 General

The Senior Management Team provide evidence of its leadership and commitment to the development and implementation of the management system and continually improving its effectiveness by:

- a) taking accountability for the effectiveness of the management system;
- b) Taking overall responsibility and accountability for the prevention of work-related injury and ill health and the minimization of environmental harm, as well as the provision of safe and healthy workplaces and activities;

- c) ensuring that the **Integrated Health, Safety, Environmental and Quality Policy** and objectives are established for the management system and are compatible with the strategic direction and the context of the organization;
- d) ensuring the integration of the management system requirements into the organization's other business processes, as deemed appropriate (see note);
- e) promoting awareness of the process approach;
- f) ensuring that the resources needed for the management system are available;
- g) communicating the importance of effective EHSQ management and of conforming to the management system requirements;
- h) ensuring that the management system achieves its intended results;
- i) engaging, directing and supporting persons to contribute to the effectiveness of the management system;
- j) promoting continual improvement;
- k) supporting other relevant management roles to demonstrate their leadership in their areas of responsibility.

Note: "business processes" such as accounting, employee benefits management and legal activities are out of scope of the QMS.

5.1.2 Customer focus

Senior Management Team adopt a customer-first approach which ensures that customer needs and expectations are determined, converted into requirements and are met with the aim of enhancing customer satisfaction.

This is accomplished by assuring:

- a) customer and applicable statutory and regulatory requirements are determined, understood and consistently met;
- b) the risks and opportunities that can affect conformity of products and services and the ability to enhance customer satisfaction are determined and addressed;
- c) the focus on enhancing customer satisfaction is maintained.

5.2 Policy

Senior Management Team has developed the Integrated Health, Safety, Environmental and Quality Policy, that governs day-to-day operations to ensure quality.

The Integrated Policy is also released as a standalone document, and is communicated and implemented throughout the organization.

The Integrated Policy can be found in Section 0.0 (page 4) of this document:

5.3 Organizational Roles Responsibilities and Authorities.

The Senior Management Team has assigned responsibilities and authorities for all relevant roles in the company. These are communicated through the combination of the Organizational Chart and Position Descriptions found in the Roles and Responsibilities Matrix.

In addition, the following overall EHSQ responsibilities and authorities are assigned as follows:

Responsibility	Assigned To
Ensuring that the management system conforms to applicable standards	Senior Management Team
Ensuring that the processes are delivering their intended outputs	Applicable process owner
Reporting on the performance of the management system and providing opportunities for improvement for the management system	EHSQ Management Representative
Ensuring the promotion of customer focus throughout the organization	Senior Management Team

Ensuring that the integrity of the management system is maintained when changes are planned and implemented	Senior Management Team
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The EHS Director and Quality and Process Services Manager, supported by the Managing Director, are the specific representatives who have defined roles, responsibilities and authorities for ensuring that the HSEQ system is established, implemented and maintained. These representatives reports on the performance of the Integrated Management System.

The Quality and Process Services Manager has been assigned the role of EHSQ Management Representative when having a single point of contact to represent the companies' management systems if useful or required by the customer or regulations. Other duties of the EHSQ Management Representative may be defined herein or within other documented procedures.

Specified Duties

Management

- Provide resources to implement and maintain an effective safety programme.
- Provide and maintain facilities and arrangements for the welfare of employees at work.
- Review EHSQ performance
- Set and review company policies & the MAPP. Ensure the company works towards the targets and objectives set.
- Set long-term programme objectives and approve policies within which the objectives will be achieved.
- Provide the resources to implement and maintain an effective Integrated Management programme.
- Initiate periodic safety reviews and HSEQ audits to evaluate the effectiveness of the company HSEQ programme.
- Ensure that the arrangements contained in the manual are implemented in all departments.
- Ensure that all accidents and incidents are fully investigated and corrective action is taken to prevent reoccurrence.
- Ensure compliance with relevant legislation governing health and safety and environmental performance principally contained in the *Health & Safety at Work Act, (1974)*, the *Management of Health & Safety at Work Regulations (1999)*, the *Control of Major Accident Hazards Regulations (2015)* and the *Control of Lead at Work Regulations, (2003)*.
- Ensure that all works/activities are carried out with strict adherence to environmental legislation as principally contained in the EPR Permit number EP 3230 BW, including any and all variations thereof. In addition, The Health, Safety and Welfare of all employees, contractors and the public at large be considered.

The general duties under these statutory instruments include the following responsibilities, so far as is reasonably practicable:

- Ensure the safety, health and welfare at work of all employees.
- Ensure compliance in terms of environmental performance as a minimum at all times.
- For all places of work within the control of both companies, maintain a place of work that is safe and without risk to health whilst maintaining effective environmental control.
- For all places of work within the control of both companies, provide and maintain a safe access and egress from it.
- Provide and maintain safe plant and machinery that is fit for purpose and without risk to health.
- Provide and maintain safe systems of work.
- Provide and maintain adequate procedures for the operation and monitoring of all plant and machinery associated with pollution prevention and abatement.
- Provide information, instruction, training and supervision as is necessary to ensure the safety and health of employees and adequate levels of competence in terms of environmental control procedures.
- Provide and maintain suitable protective clothing or equipment as appropriate, where alternative reasonably practicable measures fail to eliminate or control hazards in the workplace.

- The prevention of risk to any persons safety and health, or to the environment in connection with the use of any article or substance.
- Prepare and revise adequate emergency plans.
- Provide, maintain and continually improve facilities and arrangements for the welfare of employees and the effective protection of the environment at large.
- Take All Measures Necessary to prevent Major Accident Hazards and minimise risk to people and the environment.

Employees

The law lays down minimum standards of safety in many areas. Most of these obligations are placed on the employer. However, ensuring a safe place of work is a joint responsibility and the following legal obligations apply to all employees.

Integrated Management is the responsibility of all. The onus of providing adequate systems, procedures and resources to effectively manage environmental impact lies firmly with the company. However, the success of these provisions depends equally upon all employees.

A joint responsibility therefore exists between the body corporate and its employees for the environmental performance of the company. Employees should follow mutually agreed protocols and report any incidents immediately. Employees should also undertake any training as decided by the EHS department to be relevant to the implementation of the Integrated Management system.

Sections 7 & 8 of the Health & Safety at Work Act (1974). (HASWA) states:

It shall be the duty of every employee while at work:

- To take reasonable care to ensure that for his/her own safety, health and welfare and that of any other person who may be affected by his/her acts or omissions while at work;
- To co-operate with his/her employer and that of any other person to such an extent as will enable his/her employer or other person to comply with any of the relevant statutory provisions;
- To use in such a manner so as to provide the protection intended, any suitable appliance, protective clothing, convenience, equipment or other means or thing provided (whether by use by him/her alone or for use by him/her in common with others) for securing his/her safety, health and welfare, of which he/she becomes aware.
- No person shall intentionally or recklessly interfere with or misuse any appliance, protective clothing, equipment or other means or thing provided in pursuance or any relevant statutory provision or otherwise, for securing safety, health and welfare of persons arising out of work activities.

Regulation 14 of the Management of Health & Safety at Work Regulations, (1999), (MHSW) states:

It shall be the duty of every employee, taking into account training and instructions given by his employer, to: -

- Make correct use of machinery, apparatus, tools, dangerous substances, transport equipment and other means of production, and
- In cases where an employee is provided with personal protective equipment pursuant to these Regulations:
- To make full and proper use of equipment;
- To use such equipment in accordance with the instructions provided by the employer, and
- To take all reasonable steps to ensure that such equipment is returned to storage after use.

EHS Director

- Provide technical guidance and project management to the organisation on related health and safety matters.
- Monitor Safety Programmes for effectiveness and Recommend and design new safety guidelines.
- Assist in accident investigations to help team leaders identify underlying causes and appropriate corrective action.
- Conduct, in conjunction with Management regular inspections of work conditions and practices.
- Co-ordinate Risk Assessment including the site COMAH Safety Report
- As requested, review the safety and health aspects of new substances, equipment, plant modifications and layout.

- Where health hazards or potential health hazards exist, co-ordinate occupational hygiene monitoring to evaluate employee exposure.
- Recommend and co-ordinate safety training programmes.
- Conduct team leader safety training.
- Evaluate safety equipment, including Personal Protective Equipment and set standards for selection and use.
- Submit the required reports to the Health & Safety Authority.
- Review and, if necessary, revise the system annually or with the introduction of new equipment / processes.
- Maintain liaison with Safety Representatives.
- Provide technical guidance and project management to the organisation on related Environmental matters.
- Monitor Integrated Management Programmes for effectiveness.
- Recommend and design new Environmental guidelines.
- Assist in accident/incident investigations to help team leaders identify underlying causes and appropriate corrective action.
- Conduct, in conjunction with Management regular inspections of work conditions and practices.
- Co-ordinate Risk Assessment.
- As requested, review the environmental safety and health aspects of new substances, equipment, plant modifications and layout.
- Where environmental hazards or potential environmental hazards exist, co-ordinate environmental monitoring to evaluate potential.
- Recommend and co-ordinate environmental training programmes.
- Conduct team leader environmental training.
- Evaluate safety equipment, including Personal Protective Equipment and set standards for selection and use.
- Submit the required reports to the relevant authority.

Occupational Health Specialist

- Evaluate the health of all applicants and employees through pre-employment and periodic medical examinations.
- Co-ordinate the treatment and review of all occupational injuries and illnesses.
- Advise management on the severity of all occupational injuries and illnesses.
- Review and update the arrangements for providing emergency medical care.
- Advise all employees on health matters relating to their employment with EnviroWales Ltd and Jamestown Industries Ltd.
- Inform all employees on any health impairment identified as a result of medical examinations.
- Maintain current knowledge on the working environment in the companies.
- Maintain confidential medical records of employees as appropriate.
- Ensure compliance with CLAW (2002)

5.4 Consultation and Worker participation

The Companies encourages the participation of all company personnel in the development, implementation and maintenance of the IMS, including suggestions which would lead to improvements in the Companies' performance.

Consultation is a two-way communication process; Company personnel exposed to risks are consulted about decisions to be taken to control the risks and enable comments.

Participation of workers is a process of cooperation to contribute to decision-making processes on IMS performance and any suggested/proposed changes.

This cooperation includes workers being given adequate information, generally at Site and task/area specific inductions, supplemented by ongoing dissemination of information, via their team leaders, at the daily shift meetings.

To promote consultation and participation, Team Leaders generally act as representatives of employees as defined in the Health and Safety (Consultation with Employees) Regulations 1996.

All personnel are required to co-operate with the company in the implementation of company policies to ensure the health, safety and welfare of all persons involved in the work and of other persons who may be affected by the work activity.

All company personnel are encouraged to contribute suggestions relating to the improvement of the IMS and related safe working methods and plant/equipment etc.; these suggestions can be submitted directly to a Director or to the person's

immediate line manager. Daily shop floor meetings are held with Team leader attendance being compulsory. These meetings are:

- A Health and Safety/Environmental refresher/reminder on appropriate issues/topics;
- The forum where the Process Engineers can identify issues raised by management and related actions;
- The forum where any operative can raise safety, health, welfare or environmental concerns.

These concerns may be addressed either locally by the Process Engineers or Companywide by top management. This may be after formal review and/or discussions with other Process Engineers and/or other senior personnel. Tool Box Talks are also held as necessary and attendance documented by attendance records.

The Companies feel that removing barriers to participation, or reducing them to a minimum when removal is not possible, is essential if the IMS is to be effective; all Company personnel are encouraged to make suggestions, these can be made without threat of dismissal, discipline, or other such reprisals.

Top management endeavour, through their leadership and example, to create shared visions and values and to maintain a working environment, both on Sites and within offices, in which Company personnel can become fully involved in achieving the Company's objectives.

Top management feel that our people are our most valuable and critical resource; to nurture this resource, we ensure that the work environment encourages personal development, learning, knowledge transfer, involvement and teamwork, thus ensuring a safe workplace with zero incidents.

Worker consultation and participation is controlled per the procedure **5.4- Consultation**

Planning

6.1 Actions to Address Risks and Opportunities

Note: The companies deviate slightly from the approach towards risk and opportunity presented in ISO 9001. Instead, The companies views “uncertainty” as neutral, but defines “risk” as a negative effect of uncertainty, and “opportunity” as a positive effect of uncertainty. The companies have elected to manage risks and opportunities separately, except where they may overlap. Formal risk management may not be utilized in all instances; instead, the level of risk assessment, analysis, treatment and recordkeeping will be performed to the level deemed appropriate for each circumstance or application.

The companies take a three pronged approach to risk management.

Level	Focus	System
Higher	Lower	Context Risk and Opportunities
Medium	Medium	Area Risk Assessments
Lower	Higher	Safe Systems of Work

Business risks and opportunities are identified as part of the “Context of the Organization Exercise” defined in Context of the Organization, as well as throughout all other activities of the management system.

Business risks and opportunities are managed in accordance with the document **4.1- Risk and Opportunity Management**. This procedure defines how risks are managed in order to minimize their likelihood and impact, and how opportunities are managed to improve their likelihood and benefit.

6.1.2(E) Environmental Aspects

The companies have thoroughly reviewed all business activities on both sites and have applied principles of risk/hazard assessment in arriving at a comprehensive list of Impacts and Aspects of those activities.

Identification of the environmental aspects and impacts takes into account the inputs and outputs (both intended and unintended) of our work activities and possible emergency situations; this takes cognisance of previous emergency situations.

When identifying the environmental aspects and impacts of our work activities, the companies' considerations include, but are not limited to:

- i. Emission to air, water or land as applicable;
- ii. Use of raw materials and natural resources – Whilst we are predominantly a recycling company we use significant quantities of fossil fuels;
- iii. Use of energy;
- iv. Energy emitted (e.g. heat, radiation, vibration (noise), light);
- v. Generation of waste and/or by-products;
- vi. Use of space;

The list of activities is shown below though detail as to the Impacts and Aspects derived from those activities are contained in document **6.1.2(E) - Impacts and Aspects Register**. It is assumed that this list and the associated Impacts and Aspects will require amendment and addition over time.

Activities

- | | |
|-------------------------|----------------------------|
| ➤ Lead Smelting | ➤ Battery Breaking |
| ➤ Lead Melting | ➤ Paste De-Sulphurisation |
| ➤ Lead Refining | ➤ Waste Management |
| ➤ Lead Rolling | ➤ Jamestown Industries Ltd |
| ➤ Rolled Lead Finishing | ➤ Polypropylene Plant |

6.1.2 EHS Hazard Identification and assessment of EHS risks.

6.1.2.1 Hazard identification

The overall purpose of the risk assessment process is to evaluate the hazards that arise or might arise in the course of the organization's activities, and ensure that the risks to people arising from these hazards are assessed, prioritized and controlled to eliminate hazards or reduce risks to acceptable levels.

Hazards have the potential to cause injury or ill health. They need to be identified before the risks associated with these hazards can be assessed and, if no controls exist or existing controls are inadequate, effective controls should be implemented according to the hierarchy of controls.

Hazard identification should aim to determine proactively all sources, situations or acts (or a combination of these), arising from an organization's activities, with a potential for harm in terms of injury or ill health. Examples include:

- Sources (e.g. moving machinery, radiation or energy sources);
- Situations (e.g. working in confined spaces, working at height);
- Acts (e.g. manual handling, wearing PPE).

Hazard identification should consider the different types of hazards in the workplace, including:

- Physical (e.g. slips, trips and falls, entanglement, noise, vibration, harmful energy sources);
- Chemical (e.g. inhalation, contact with or ingestion of chemicals);
- Biological (e.g. contact with allergens or pathogens such as bacteria or viruses);
- Psychosocial (e.g. threat of physical violence, bullying or intimidation);

The organization's hazard identification process should take account of the following:

- Routine and non-routine activities such as plant cleaning and maintenance, extreme weather conditions, refurbishment and plant start-ups/shut-downs;
- Activities of all persons having access to the workplace including contractors, visitors and home-based workers;
- Human behaviour, capabilities and other human factors;
- Identified hazards originating outside the workplace capable of adversely affecting the health and safety of person under the control of the organization within the workplace;
- Hazards created in the vicinity of the workplace by work-related activities under the control of the organization;

- Infrastructure, equipment and materials at the workplace, whether provided by the organization or others;
- Changes or proposed changes in the organization or its activities;
- Modifications to the OH&S management system, including temporary changes, and their impact on operations, processes and activities;
- Any applicable legal obligations relating to risk assessment and the implementation of necessary controls;
- The design of work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adaptation to human capabilities;
- Potential emergency situations;
- Changes in knowledge of, and information about, hazards;
- New or changed hazards.

6.1.2.2 Assessment of OH&S risks and other risks to the OH&S management system

The organization must establish, implement and maintain a process to:

- Assess OH&S risks from the identified hazards, whilst taking into account the effectiveness of existing controls;
- Determine and assess the other risks related to the establishment, implementation and maintenance of the OH&S management system.

An organization needs to apply the process of hazard identification and risk assessment to determine the controls that are necessary to reduce the risks of injury and/or ill health. The purpose of risk assessment is to address the hazards that might arise in the course of the organization's activities and ensure that the risks to people arising from these hazards are assessed, prioritized and controlled.

This is achieved by:

- Developing a methodology for hazard identification and risk assessment;
- Identifying hazards;
- Estimating the associated risk levels, taking into account the adequacy of existing controls, based on an assessment of the likelihood of the occurrence of a hazardous event or exposure and the severity of injury or ill health that can be caused by the event or exposure;
- Determining whether these risks are acceptable vis a vis the organization's legal obligations and its OH&S objectives;
- Determining the appropriate risk controls, where these are found to be necessary;
- Documenting the results of the risk assessment;
- Reviewing the hazard identification and risk assessment process on an ongoing basis.

The outputs from the risk assessment process should be used in the implementation and development of other parts of the integrated management system such as competence, operational planning and control, and monitoring, measurement, analysis and performance evaluation.

There is no single methodology for hazard identification and risk assessment that is suitable for all organizations. Hazard identification and risk assessment methodologies vary greatly across industries, ranging from simple assessments to complex numerical methods with extensive documentation. Individual hazards might require that different methods be used, e.g. an assessment of long term exposure to hazardous substances might need a different method from that taken for equipment safety or for assessing an office workstation. Each organization should choose the method that is appropriate to its scope, nature and size. The chosen approach should result in a comprehensive methodology for the ongoing evaluation of the organization's risks.

Where the organization's risk assessment uses descriptive categories for assessing severity or likelihood of harm, these should be clearly defined, e.g. clear definitions of terms such as "likely" and "unlikely" are needed to ensure that different individuals interpret them consistently.

The organization should consider risks to sensitive populations (e.g. pregnant employees) and vulnerable groups (e.g. young workers) as well as any particular susceptibilities of the individuals involved in performing particular tasks (e.g. the ability of an individual to read instructions).

The risk assessment should involve consultation with, and participation by, workers and take into account legal and other requirements.

Risk assessment should be conducted by personnel with competence in risk assessment methodologies and techniques and appropriate knowledge of the organization's work activities.

The organization should also consider risks which are not directly related to the health and safety of people, but which affect the integrated management system itself and can have an impact on its intended outcomes.

Risks to the integrated management system include:

- Failure to understand the context of the organization;
- Failure to address the needs and expectations of relevant interested parties;
- Inadequate consultation and participation of workers;
- Inadequate planning or allocation of resources;
- An ineffectual audit programme;
- An incomplete management review;
- Poor succession planning for key roles;
- Poor engagement by top management.

Clause 6.1.2.3 Assessment of OH&S opportunities and other opportunities to the integrated management system

The organization must establish, implement and maintain a process to assess:

- OH&S opportunities to enhance OH&S performance, while considering planned changes to the organization, its policies, processes or activities;
- Other opportunities for improving the OH&S management system.

Opportunities to improve OH&S performance include:

- Consideration of hazards and risks when planning and designing facilities, processes, plant and equipment, and materials;
- Modification of working processes including the alleviation of monotonous and repetitive work;
- Introduction of new technology to ameliorate high-risk activities;
- Collaborating in forums that focus on issues relating to occupational health and safety.
- Introduction of job safety analysis and task-related assessments;
- Implementation of permit-to-work processes;
- Implementation of ergonomic and other injury prevention-related assessments;
- Improvement of the occupational health and safety culture of the organization;

Opportunities to improve the OH&S management system include:

- Enhancing the visibility of top management's support for the OH&S management system;
- Improving worker consultation and participation in OH&S decision making;
- Enhancing the incident investigation process;
- Improving two-way communication on OH&S issues and promoting OH&S in the work place;
- Expediting corrective actions to address OH&S nonconformities;
- Implementing OH&S objectives with the same passion as other business objectives;
- Improving competency in identifying hazards, dealing with OH&S risks and implementing appropriate controls;
- Adopting a risk assessment approach to conducting OH&S audits;

- Viewing workers at all levels as a key resource of the organization;
- Ensuring that the management review promotes a strategic and critical evaluation of the OH&S management system.

6.1.3 Compliance Obligations

Legal compliance is considered to be a minimum level of performance by the company and a culture of continuous improvement exists within the management team that seeks to improve performance against those constraints in an effort to promote minimum environmental impact.

Constraints of the EPR Permit number EP3230BW are communicated to all employees and regularly discussed by the management team in detail as a means of performance indication.

The company will at all times operate within the law by ensuring the following points are covered as an integral part of the Integrated Management activities of the site:-

The Organization shall ensure that:

- Legal requirements applicable to all environmental impacts and aspects of its activities, products, and services are determined.
- All affected employees have access to and clearly understand legal requirements.
- Compliance with all relevant environmental legislation and regulations is evaluated periodically.
- Applicable non-regulatory requirements are also determined. These can include items such as industry codes and standards, voluntary initiatives and guidelines, customer requirements, and so forth.

THE CONTROL OF LEAD AT WORK REGULATIONS 2002 (CLAW)

As a result of its core business operations the Organization is subject to specific legislative controls. One of these specific controls is CLAW.

CLAW is a complicated set of regulations that deals with occupational exposure to lead and its compounds and the risks associated with that exposure.

The Organization is committed to protecting the Health, Safety and Welfare of its employees and to that end will fully comply with CLAW at all times as a minimum requirement.

The companies will strive to minimise exposure of its workforce to lead via the media of effective risk assessment methodologies, operational/process controls, appropriate training and PPE that is both adequate and effective.

ENERGY EFFICIENCY

Both companies recognise the need to use all resources, including energy, as efficiently as possible. Energy efficiency has an impact upon business activities in both economic and environmental terms.

Energy efficiency

- Energy efficient motors, drives and processes will be used wherever practicable
- Energy efficiency is included in project review/design
- Awareness of energy consumption and costs is promoted within the company
- Monitoring of key energy consumers takes place
- Consumption is reviewed regularly by the engineering and finance dept.

6.2 System Objectives and Planning to Achieve Them

6.2.1 System Objectives

The EHSQ management system has, at its core, established specific objectives (overall goals) with measurable targets (detailed performance requirements) that will result in improved EHS performance.

The companies identify and monitor its objectives through the use of an annual Development / improvement Plan. This plan is reviewed by the Management Team monthly and progress towards defined targets is measured.

The Development Plan is developed in line with Corporate goals and objectives. This in turn is cascaded throughout the Organization to relevant individuals thus aligning all employees to the same objectives and targets.

Individual progress is reviewed monthly with department managers at which time any barriers to progress are identified, discussed and resolved.

As part of the adoption of the process approach, the companies utilize its process objectives, as discussed in 4.4 above, as the main objectives for the EHSQ management system. These include overall environmental, safety and product-related quality objectives; additional environmental, safety and product-related quality objectives may be defined in work instructions or customer requirements.

The process objectives have been developed in consideration that they:

- b) be consistent with the EHSQ policy;
- c) be measurable;
- d) take into account
 - i. Applicable requirements;
 - ii. The results of the assessment of risk and opportunities;
 - iii. The results of consultation with workers;
- e) be relevant to conformity of products and services and to enhancement of customer satisfaction;
- f) be monitored;
- g) be communicated;
- h) be updated as appropriate.

6.2 Planning to Achieve System Objectives

Process objectives are set and reviewed in the minutes of management review per section 9.3 below.

The planning of process objectives is defined in section **6.2 EHSQ Objectives and planning to achieve them.**

Each process has a KPI (as explained in section 4.4.2 above) and responsibility for achieving the objective is assigned to a member of the management team, typically the department head or a person with suitable influence to deliver the required outcome.

Unless otherwise specified, completion of the objective should be by the end of the current financial year by optimization of existing processes or the more efficient use of existing resources. Where significant changes to processes or resources required are necessary, this will be captured as per section 6.3 below.

6.3 Planning of Changes

Changes to the management system and its processes are carried out in a planned manner per the procedure

6.3 - Plant & Process Change Control.

Support

7.1 Resources

7.1.1 General

The companies determine and provide the resources needed:

- a) to implement and maintain the management system and continually improve its effectiveness
- b) to enhance customer satisfaction by meeting customer requirements

Resource allocation is done with consideration of the capability and constraints on existing internal resources, as well as needs related to supplier expectations.

Resources and resource allocation are assessed during management reviews.

7.1.2 People

Senior management ensures that it provides sufficient staffing for the effective operation of the management system, as well its identified processes.

7.1.3 Infrastructure

The companies determine, provide and maintain the infrastructure needed to achieve conformity to product requirements. Infrastructure includes, as applicable:

- a) buildings, workspace and associated facilities;
- b) process equipment, hardware and software;
- c) supporting services such as transport;
- d) information and communication technology.

Equipment is maintained per the procedure **7.1.3 - Preventive Maintenance**.

Both sites use a dedicated engineering and maintenance dept. under the control of the site engineering manager and staffed by suitably qualified and experienced personnel. This department deals with all routine and non-routine maintenance tasks on site.

Routine planned maintenance is regularly organised in order to maintain plant and process safety, integrity and efficiency. Planned preventative maintenance is scheduled through the computerised maintenance management system (CMMS) software. The performance of the PPM system is monitored on a monthly basis, with the results of the review distributed among senior managers.

- The Engineering dept. has a high profile role in the maintenance of the Site Protection and Monitoring Programme, developed as per EPR permit EP3230BW requirements.
- The plant on both sites is designed to minimise environmental impact wherever possible and high priority is afforded this aspect of operations when assessing maintenance requirements.

7.1.4 Environment for the Operation of Processes

The companies provides safe and well-lit working environment. The Senior Management Team of The companies manages the work environment needed to achieve conformity to product requirements.

Human factors are considered to the extent that they directly impact on the quality of products.

Note: Social, psychological and safety aspects of the work environment are managed through activities outside of the scope of the management system. Only work environment aspects which can directly affect process efficiency or product and service quality are managed through the management system.

7.1.5 Monitoring and Measuring Resources

Where equipment is used for critical measurement activities, such as inspection and testing, these shall be subject to control and either calibration or verification; see the procedure **7.1.5 - Control of Test Equipment Calibration**.

Note: Calibration and measurement traceability is not employed for all measurement devices. Instead, the companies determine which devices will be subject to calibration based on its processes, products and services, or in order to comply with specifications or requirements. These decisions are also based on the importance of a measurement, and considerations of risk.

7.1.6 Organizational Knowledge

The companies also determine the knowledge necessary for the operation of its processes and to achieve conformity of products and services. This may include knowledge and information obtained from:

- a) internal sources, such as lessons learned, feedback from subject matter experts, and/or intellectual property;
- b) external sources such as standards, academia, conferences, and/or information gathered from customers or suppliers.

This knowledge shall be maintained, and made available to the extent necessary.

When addressing changing needs and trends, The companies shall consider its current knowledge and determine how to acquire or access the necessary additional knowledge.

7.2 Competence

Staff members performing work affecting the management system are competent on the basis of appropriate education, training, skills and experience. The Company realises that even with the best engineered work arrangements people still need clearly defined safety procedures and instructions. For that reason there is a substantial commitment by Management to identify HSEQ training needs, to carry out the training and to measure the effectiveness of that training. Strong emphasis will be placed on occupational health and safety aspects during all training programmes.

The company expects that all employees will co-operate in the training programmes provided. The EHS Director and Health and safety officer will co-ordinate an on-going environmental training programme to meet the needs of employees at all levels of the organisation. Training initiatives will include formal classroom training using presenters from within and outside the organisation, On the Job Training (OJT) and safety meetings.

EHS Training Activities at both sites will include the following topics:

- | | | |
|---------------------------|--------------------------|--------------------------|
| ➤ Confined Space | ➤ Hoist Safety | ➤ Manual Handling |
| ➤ EHS Induction | ➤ Incident Investigation | ➤ Occupational First Aid |
| ➤ Emergency Response Team | ➤ Incident Investigation | ➤ Permit-To-Work |
| ➤ Fire Drill / Evacuation | ➤ Internal Auditor | ➤ Permit-To-Work |
| ➤ Fork Truck | ➤ Isolation | ➤ Risk Assessment |

The documented procedure **7.2 - Training and Competence** defines these activities in detail.

Note: the management system does not include other aspects of Human Resources management, such as payroll, benefits, insurance, employee relations or disciplinary actions.

7.3 Awareness

Training and subsequent communication ensure that workers under our control aware of:

- company policies;
- relevant HSEQ objectives;
- their contribution to the effectiveness of the management system, including the benefits of improved performance;
- the implications of not conforming with the management system requirements.
- The importance of conformance with the Organisations policies and procedures.
- Awareness of the hazards associated with work activities and the benefits of improved personnel performance.
- Roles and responsibilities in achieving conformance with the Organisations policy and procedures.

7.4 Communication

Senior Management Team of the companies ensure internal communication takes place regarding the effectiveness of the management system. Internal communication methods include:

- Use of corrective and preventive action processes to report nonconformities or suggestions for improvement.
- Use of the results of analysis of data including accident and environmental incident reports and statistics.
- Meetings (periodic, scheduled and/or unscheduled) to discuss aspects of the management system.
- Use of the results of the internal audit process.
- EHS committee meetings.
- Formal training and toolbox talks.
- Regular company meetings with all employees.
- Internal emails.
- Memos to employees and copies of meeting minutes on company notice boards.
- The companies' "open door" policy which allows any employee access to Senior Management Team for discussions on improving the management system.

The documented procedure **7.4- Communication** defines these activities in detail.

7.5 Documented Information

The management system documentation includes both documents and records.

Note: the ISO 9001:2015 standard uses the term “documented information”; The companies does not use this term, but instead relies on the terms “document” and “record” to avoid confusion. In this context the terms are defined by the companies as provided for in section 3.0 above. Documents and records undergo different controls as defined herein.

The extent of the management system documentation has been developed based on the following:

- a) The size of the companies
- b) Complexity and interaction of the processes
- c) Risks and opportunities
- d) Competence of personnel

Documents required for the management system are controlled in accordance with procedure **7.5.1 - Issue and Control of Documents**. The purpose of document control is to ensure that staff have access to the latest, approved information, and to restrict the use of obsolete information. All documented procedures are established, documented, implemented and maintained.

A documented procedure **7.5.2 - Control of EHSQ Records** has been established to define the controls needed for the identification, storage, retrieval, protection, retention time, and disposition of quality records. This procedure also defines the methods for controlling records that are created by and/or retained by suppliers.

These controls are applicable to those records which provide evidence of conformance to requirements; this may be evidence of requirements, contractual requirements, procedural requirements, or statutory/regulatory compliance. In addition, quality records include any records which provide evidence of the effective operation of the management system.

Operation

8.1 Operational Planning and Control

Operational control of the EnviroWales and Jamestown sites is essentially the responsibility of the management team, headed by the Managing Director, with each manager having clearly defined areas of direct responsibility and authority.

The Site Protection and Monitoring Programme details measures designed to ensure safe and effective operational control in terms of maintaining plant integrity and compliance.

All EnviroWales and Jamestown business activities are conducted with legal compliance as a minimum requirement and all efforts are made to continually improve our business in order to prepare for changing conditions and legislation.

8.1.1 General

The companies' plans and develops the processes needed to meet the requirements of the integrated management system and for the realization of its products. Planning of realization is consistent with the requirements of the other processes of the management system. Such planning considers the information related to the context of the organization (see section 2.0 above), current resources and capabilities, as well as requirements.

Such planning is accomplished through:

- a) determining the requirements for the products ;
- b) establishing criteria for the processes and the acceptance of products ;
- c) determining the resources needed to achieve conformity to the requirements;
- d) implementing control of the processes in accordance with the criteria;
- e) determining, maintaining and retaining documented information to the extent necessary to have confidence that the processes have been carried out as planned and to demonstrate the conformity of products to their requirements.
- f) Adapting work to workers.

Outsourced processes and the means by which the companies control them are defined in the documented procedure ***IP-152 - Outsourced Processes***.

8.1.2 Eliminating hazards and reducing OH&S risks.

The companies are committed to eliminating, or in not possible, reducing the OH&S risks faced by our staff. Where this is done the following hierarchy of controls is followed;

- a) Eliminate the hazard;
- b) Substitute with less hazardous processes, operations, materials or equipment;
- c) Using engineering controls or reorganization of the work;
- d) Use of administrative controls, including training;
- e) Use adequate personal protective equipment.

8.1.3 Control of Changes

The companies review and control both planned and unplanned changes to processes to the extent necessary to ensure continuing conformity with all requirements.

Process change management is defined in the document ***8.5.6 - Plant & Process Change Control***

Documents are changed in accordance with procedure ***7.5.1 - Issue and Control of Documents***.

8.1.4 Procurement

8.1.4.1 General

Information on the procurement processes can be found in ***section 8.4*** of this manual.

8.1.4.2 Contractors.

Contractor selection is based on availability and is subject to references. References can be previous use, word of mouth, written customer reviews or participation in safe contractor schemes.

Contractors receive a copy of the document **8.1.4.2 a Site Rules** and confirm receipt and acceptance by return of **8.1.4.2 b Contractors Agreement**. Copies of relevant insurance are requested and satisfactory contractors are added to the approved supplier list. Contractors staff receive site induction as set out in **8.1.4.2 a Site Rules**.

Contractors visiting site are governed by **8.1.2.4 Contractors & Visitors Safety Procedure**

8.1.4.3 Outsourced Processes

Any process performed by a third party is considered an “outsourced process” and must be controlled, as well. The companies’ outsourced processes and the control methods implemented for each, are defined in **8.1.4.3 - Outsourced Processes**

The type and extent of control to be applied to the outsourced process take into consideration:

- a) the potential impact of the outsourced process on the company’s capability to meet its legal obligations, agreed targets and objectives or provide product that conforms to requirements,
- b) the degree to which the control for the process is shared,
- c) the capability of achieving the necessary control through the purchasing contract requirements.

8.2 EHS Emergency Preparedness and Response

Every Organization is subject to potential unforeseen emergencies that could lead to temporary or permanent injury, loss or damage to employees, equipment or plant or a MATTE. The emergency response plan is designed to provide uniform emergency response.

The Organization is located close to fire brigade station (approximately two miles away). There is also a full accident and emergency hospital located in Abergavenny. The traffic flow is not congested in this area and the estimated travel time to the Hospital is approximately 20 minutes. The main focus of the emergency response plan is to minimise injury to personnel and damage to plant until the arrival of the emergency services.

As part of the Company’s duties under COMAH, relevant information is provided to the local authority (Blaenau Gwent County Council) civil contingencies dept. to enable the compilation of an external emergency response plan.

The company’s objectives are as follows:

- To highlight potential emergency situations.
- To prepare and educate personnel of the appropriate steps in the event of an emergency.
- Establish effective lines of authority to minimise decision making time.
- To reduce costs by minimising losses.

Potential emergencies at the Organization include:

- Major accident
- Fire / explosion
- Major chemical spill
- Flood

done in accordance with the document **8.2 EHS - Emergency Preparedness and Response**.

8.2 Q Requirements for Products and Services

8.2.1 Customer Communication

The companies have implemented effective communication with customers in relation to:

- a) providing information relating to products;
- b) handling enquiries, contracts or orders, including changes;
- c) obtaining customer feedback relating to products and services, including customer complaints;
- d) handling or controlling customer property;
- e) establishing specific requirements for contingency actions, when relevant.

8.2.2 Determining the Requirements Related to Products and Services

During the intake of new business The companies captures:

- a) requirements specified by the customer, including the requirements for delivery and post-delivery activities;
- b) requirements not stated by the customer but necessary for specified or intended use, where known
- c) statutory and regulatory requirements related to products;
- d) any additional requirements determined by The companies.

These activities are defined in greater detail in the procedure **8.2.2 Q – Customer Enquiries**.

8.2.3 Review of Requirements Related to Products and Services

Once requirements are captured, the companies review the requirements prior to its commitment to supply. This review ensures that the companies have the capability and capacity to:

- a) meet all requirements specified by the customer, including requirements for delivery and post-delivery activities;
- b) meet any requirements not stated by the customer, but which The companies knows as being necessary;
- c) meet all requirements determined necessary by The companies itself;
- d) meet all related statutory and regulatory requirements;
- e) meet any contract or order requirements differing from those previously expressed (i.e., from a previous The companies quote).

These activities are defined in greater detail in the procedure **8.2.2 Q – Customer Enquiries**.

8.2.4 Changes to Requirements for Products and Services

The companies updates all relevant requirements and documents when the requirements are changed, and ensures that all appropriate staff are notified; see the documented procedure **8.2.2 Q – Customer Enquiries**.

8.3 Design and Development of Products and Services

This clause was determined to be not applicable to the companies.

As The companies products are manufactured to customer specification and BS EN 12588:2006 requirements regarding chemical composition, the company has no design and development input or output with respect to its products. This section is therefore not applicable to The companies' business.

8.4 Control of Externally Provided Processes, Products and Services

The companies ensure that purchased products or services conform to specified purchase requirements. The type and extent of control applied to the supplier and the purchased products or services are dependent on the EHS risks, the effect on subsequent realization or the final product.

The companies evaluate and select suppliers based on their ability to supply products and services in accordance with the organization's requirements. Criteria for selection, evaluation and re-evaluation are established.

Purchases are made via the release of formal purchase orders and/or contracts which clearly describe what is being purchased. Received products or services are then verified against requirements to ensure satisfaction of requirements. Suppliers who do not provide conforming products or services may be requested to conduct formal corrective action.

These activities are further defined in the documents **QP-030 - Purchasing** and **QP-040 - Goods Receipt**

8.5 Production and Service Provision

8.5.1 Control of Production and Service Provision

To control its provision of products, the companies consider, as applicable, the following:

- a) the availability of documents or records that define the characteristics of the products as well as the results to be achieved;
- b) the availability and use of suitable monitoring and measuring resources;
- c) the implementation of monitoring and measurement activities;
- d) the use of suitable infrastructure and environment;
- e) the appointment of competent persons, including any required qualifications;
- f) the validation and revalidation of special processes if applicable (see below);
- g) the implementation of actions to prevent human error;
- h) the implementation of release, delivery and post-delivery activities.

At this time, the companies do not utilize any in-house “special processes” where the result of the process cannot be verified by subsequent monitoring or measurement, either by 100% inspection or by statistical sampling. This section is therefore not applicable to the companies’ business.

8.5.2 Identification and Traceability

Where appropriate, the companies identify its critical process outputs by suitable means. Such identification includes the status of the output with respect to monitoring and measurement requirements. Unless otherwise indicated as nonconforming, pending inspection or disposition, or some other similar identifier, all outputs shall be considered conforming and suitable for use.

If unique traceability is required by contract, regulatory or other established requirement, the companies control and record the unique identification of the output.

The documented procedure **8.5.2 Q - Identification of Material Batches** defines these methods in detail.

8.5.3 Property Belonging to Customers or External Providers

The companies exercise care with customer or supplier property while it is under the organization’s control or being used by the organization. Upon receipt, such property is identified, verified, protected and safeguarded. If any such property is lost, damaged or otherwise found to be unsuitable for use, this is reported to the customer or supplier and records maintained.

For customer intellectual property, including customer furnished data used for design, production and / or inspection, this is identified by customer and maintained and preserved to prevent accidental loss, damage or inappropriate use.

This activity is defined in greater detail in the document **8.5.3 Q - Control of Third-Party Property**.

8.5.4 Preservation

The companies preserve conformity of product or other process outputs during internal processing and delivery. This preservation includes identification, handling, packaging, storage, and protection. Preservation also applies to the constituent parts of a product.

The documented procedure **8.5.4 Q - Handling and Storage of Product and Control of Damaged Material** defines the methods for preservation of product.

8.5.5 Post-Delivery Activities

As applicable, the companies conduct the following activities which are considered “post-delivery activities”:

- Providing BS EN 12588: 2006 Enviro Lead sheet roofing ancillaries from Premium Roofing Products are used together, the installer is able to offer a 50 year warranty to their customers. This is insurance backed and provided by the Lead Sheet Association.

Post-delivery activities are conducted in compliance with the management system defined herein. In determining the extent of post-delivery activities that are required, the companies consider:

- a) statutory and regulatory requirements;
- b) the potential undesired consequences associated with its of products;
- c) the nature, use and intended lifetime of its of products;
- d) customer requirements;
- e) customer feedback.

8.5.6 Control of Changes

The companies review and control both planned and unplanned changes to processes to the extent necessary to ensure continuing conformity with all requirements.

Process change management is defined in the document **8.5.6 - Plant & Process Change Control**

Documents are changed in accordance with procedure **7.5.1 - Issue and Control of Documents**.

8.6 Release of Products and Services

Acceptance criteria for products are defined in appropriate subordinate documentation. Reviews, inspections and tests are conducted at appropriate stages to verify that the requirements have been met. This is done before products are released.

8.7 Control of Nonconforming Outputs

The companies ensures that products or other process outputs that do not conform to their requirements are identified and controlled to prevent their unintended use or delivery.

The controls for such non-conformances are defined in **8.7 - Control of Nonconforming Product**.

Performance Evaluation

9.1 Monitoring, Measurement, Analysis and Evaluation

9.1.1 General

The companies has determined which aspects of its quality management system must be monitored and measured, as well as the methods to utilize and records to maintain, within this Manual and subordinate documentation.

Monitoring and measurement of the processes, as defined in 4.4 above, ensure that the Senior Management Team evaluates the performance and effectiveness of the management system itself.

9.1.2-EHS Legal and other requirements / Evaluation of compliance

The companies ensure that:

- Legal requirements applicable to all environmental and safety aspects of its activities, products, and services are determined.
- All affected employees have access to and clearly understand legal requirements.
- Compliance with all relevant EHS legislation and regulations is evaluated periodically.
- Applicable non-regulatory requirements are also determined. These can include items such as industry codes and standards, voluntary initiatives and guidelines, customer requirements, and so forth.

These activities are defined in the document **9.1.2 EHS- Evaluation of compliance**

The companies maintain legal compliance registers

9.1.2-Q Customer Satisfaction

As one of the measurements of the performance of the management system, The companies monitors information relating to customer perception as to whether the organization has met customer requirements. The methods for obtaining and using this information include:

- recording customer complaints
- monitoring product rejections as a weight percent
- customer satisfaction surveys
- Customer satisfaction surveys may have limited efficacy as a measurement tool due to The companies' limited number of customers and low response rates. The preferred measure of customer satisfaction is monitoring product rejections as a weight percent

The corrective and preventive action system shall be used to develop and implement plans for customer satisfaction improvement that address deficiencies identified by these evaluations, and assess the effectiveness of the results.

9.1.3 Analysis and Evaluation

The companies analyses and evaluates the data and information arising from monitoring and measurement in order to evaluate:

- a) the extent to which legal requirements and other requirements are fulfilled;
- b) conformity of products;
- c) the achievements of the companies EHSQ objectives;
- d) the degree of customer satisfaction;
- e) the performance and effectiveness of the management system;
- f) if planning has been implemented effectively;
- g) the effectiveness of actions taken to address identified hazards, risks and opportunities;
- h) the effectiveness of operational and other controls;
- i) the performance of external providers;
- j) the need for improvements to the management system.

Statistical techniques used may be defined in appropriate documented procedures; in all cases, the methods are based on established standards or are otherwise determined to be statistically valid.

Items measured and monitored include:

- Total Case Incident Rate (TCIR). This measures the total number of recordable injuries and illnesses.
- Accident/incident statistics by department.
- Types of accidents/incidents
- Close-out of safety related issues (reported from any source).
- Safety compliance by department (determined by safety audits).
- Close-out of environmental impact related issues (reported from any source).
- Compliance by department (determined by Environmental audits).
- Incident investigations and consequent containment/corrective actions.
- Lead in Blood statistics
- Lead in Air statistics
- Customer Satisfaction.
- Complaints from customers and other interested parties.

9.2 Internal Audit

9.2.1 General

The companies conduct internal audits at planned intervals to determine whether the management system conforms to contractual and regulatory requirements, to the requirements of ISO 9001, ISO 14001, ISO 45001, and to management system requirements. Audits also seek to ensure that the management system has been effectively implemented and is maintained.

These activities are defined in the document **9.2.1 - Internal Audits**.

9.2.2 Internal Audit Programme

Audits are acknowledged as a way of identifying opportunities for improvement and are fundamental on both sites.

All non-conformances, observations and recommendations resulting from any of the above audits together with the identified corrective actions are entered onto the Organization's safety log.

These activities are defined in the active document **9.2.2 - Internal Audit Programme**.

9.3 Management Review

Safety is a key objective at both companies and is reviewed and reported at regular intervals.

Safety performance is reviewed at Management level in a number of ways:

- All managers are encouraged to review the Organization's Safety information, on a daily basis.
- Monthly EHS committee meetings with safety representatives and EHS management team.
- A formal monthly review is established with selected managers including a review of the previous month's safety statistics, audit results, training and any specific issues.
- Development Plan objectives are formally reviewed each month with the entire Management Team.

Additionally the Senior Management Team reviews the management system at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. The review includes assessing opportunities for improvement and the need for changes to the management system, including the EHSQ Policy and objectives.

Management review frequency, agenda (inputs), outputs, required members, actions taken and other review requirements are defined in the documented procedure **9.3 - Management Review**.

Records from management reviews are maintained.

Improvement

10.1 General

The companies use the management system to improve its processes, products and services. Such improvements aim to address the needs and expectations of workers and customers as well as other interested parties, to the extent possible.

Improvement shall be driven by an analysis of data as in section 9.1.3 - Analysis and Evaluation

10.2 Incident, Nonconformity and Corrective Action

All accidents and incidents are investigated using a formalised, documented process namely, Accident, Incident & Near Miss Investigation.

Details of the accident, incident or near miss are recorded and immediate containment actions are identified and implemented. Long-term corrective actions are also identified and implemented.

Non-conformances may be identified and recorded in several ways including internal audits, external audits or observations by individual employees (reported to Team Leaders, Supervisors, Managers, Health and safety officer or EHS Director).

All such non-conformances are stored in the Organization's safety log and corrective actions and close-out dates are agreed with the relevant personnel.

Preventive actions may be identified using the Organization's formal risk assessment process or by observations by individual employees.

All such preventive actions are entered onto the Organization's safety log and actions and close-out dates are agreed with the relevant personnel.

Safety log items are reviewed daily by the OH Specialist/EHS Director and monthly by the Management Team.

The companies take corrective action to eliminate the cause of an incident or nonconformity in order to prevent recurrence. Likewise, the company takes preventive action to eliminate the causes of potential incidents and nonconformities in order to prevent their occurrence.

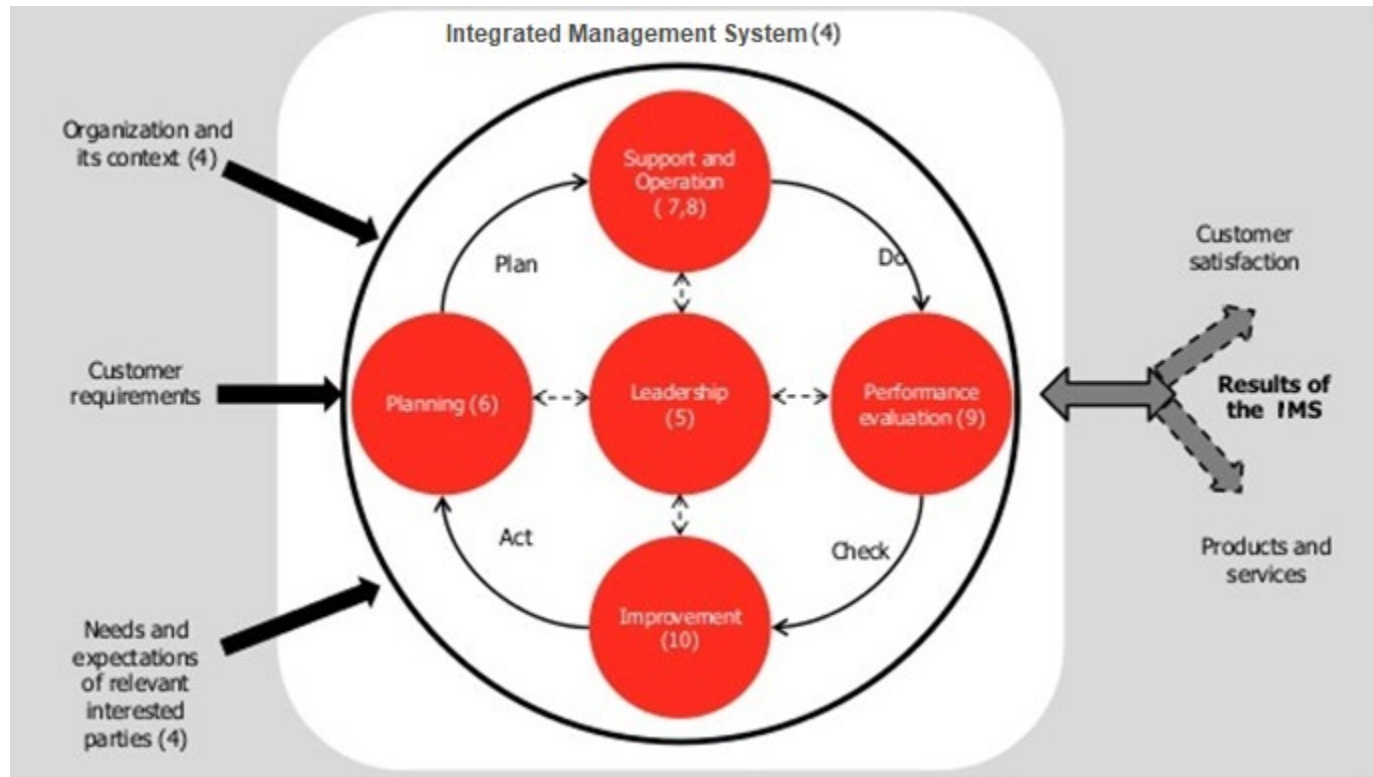
These activities are done through the use of the formal Corrective Action (**CAPA**) system, and are defined in the document **10.2 - Corrective and Preventive Action**

10.3 Continual Improvement

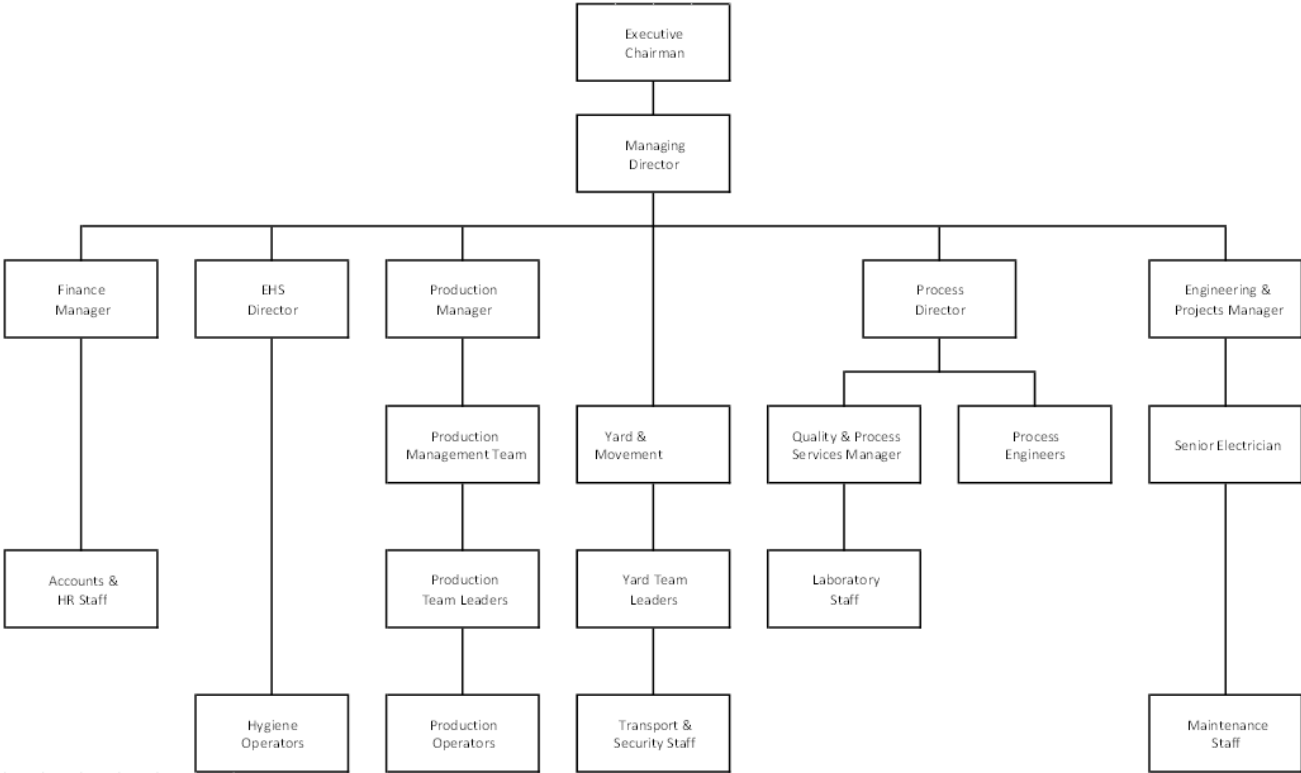
Through the process effectiveness reviews, done as part of Management Review, The companies work to continually improve the suitability, adequacy and effectiveness of the quality management system. This includes seeking opportunities for improvement.

Appendix A: Overall Process Sequence & Interaction

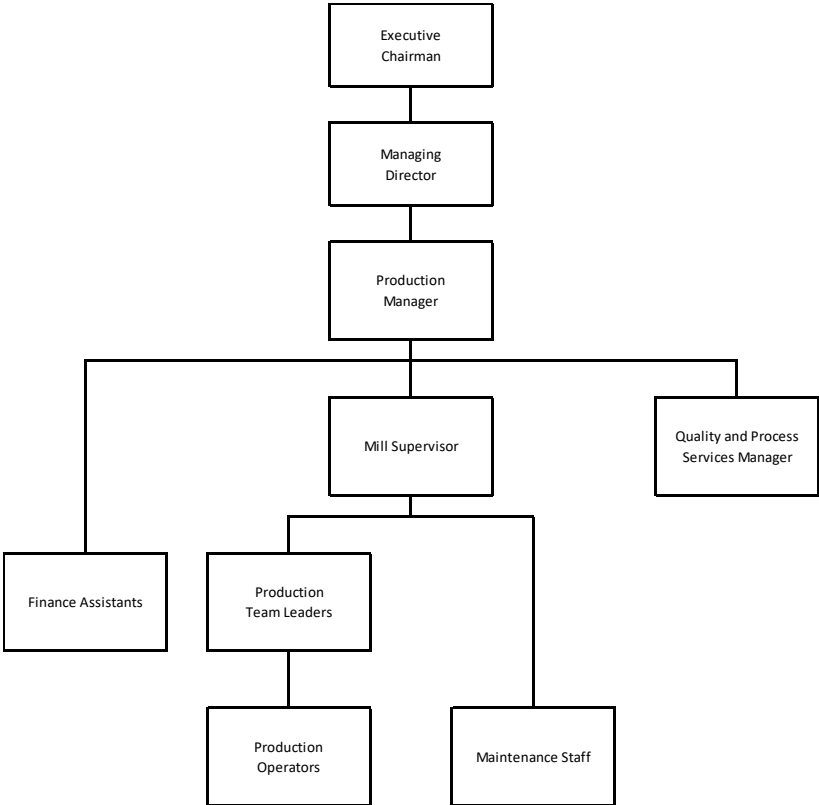
The model of a process-based quality management system included in the EN ISO 9001:2015 Standard has been adapted to provide an overview of the interactions of the processes identified in the companies' management system.



Appendix B: Organizational Charts



EnviroWales Ltd



Jamestown Industries Ltd.

Appendix C: Core Business Process CBP-01

