

Prepared by Environmental Advisor Approved by Environmental Manager

1. **OBJECTIVE**

The purpose of this manual is to document the procedures, responsibilities and processes that will be undertaken by CELSA Manufacturing (UK) Ltd. (CELSA) to establish, and subsequently maintain an Environmental Management System (EMS) that meets the requirements of ISO 14001.

CELSA has an Environmental Policy, document number CP/A004, which outlines the company's commitment to minimising the environmental impacts of the organisation.

2. **Scope**

This procedure relates to all CELSA staff and contractors, detailing awareness and responsibilities within the requirements of CELSA Manufacturing (UK) Ltd.'s ISO 14001 certified EMS associated.

Contractors when being considered for undertaking works or supplying a product will also be required, where appropriate, to abide by the company's environmental procedures. The degree of associated environmental impact from the contractor or supplier will be considered during the contract phase.

3. **RESPONSIBILITIES**

3.1 **Structure**

The Company and EMS structures are detailed in the attached Figures 1 & 2. Roles and responsibilities, with the exception of those relating to this manual, will be detailed in the individual procedures.

3.2 **General Manager**

The General Manager shall be responsible for:-

- Ensuring an Environmental Policy is developed to meet the requirements of ISO 14001 and is relevant to the business. The policy will be signed and dated by the General Manager.
- Appoint a Management Representative who will have specific defined roles within the Environmental Management System
- Sufficient resource are made available to maintain the system

3.3 **Management Representative**

The Environmental Manager is the designated Management Representative for the CELSA EMS and is responsible for:-

- Ensuring that the CELSA EMS requirements are established, implemented and maintained in accordance with ISO 14001

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- Chairing the Annual Management Review of the Environmental Management System as detailed in **CPB004 Management Review Procedure**.

3.4 Environmental Advisor/**Environmental Graduate**

The Environmental Advisor/**Environmental Graduate** reports to the Environmental Manager and is responsible for:-

- Establishing, implementing and maintaining the CELSA EMS in accordance with ISO 14001
- Liaising with service contractors on all environmental matters
- Liaising with the legislative authorities
- Liaising with Emergency Services
- Facilitating and producing minutes for the periodic environmental reviews
- Prepare and provide input to the Annual review
- Promoting environmental issues to the Senior Management Team and the General Manager
- Identifying training needs and subsequently interface with Training Manager to ensure that training is delivered
- EMS documents, review on introduction and amend when required
- Ensuring that all monitor and measure activities associated with the environmental management system are conducted and records maintained
- Identify and promote improvements relating to Environmental Management System

3.4 Departmental Managers

Each Departmental Manager is responsible for the implementation of the Environmental Policy within their department:-

- Ensure everyone within his or her department is familiar with the Policy and ensure compliance to the Policy
- Have knowledge of all key environmental aspects and possible releases to air, water or land associated with their area of supervision
- Provide and maintain safe and reliable plant and equipment; establish and maintain safe systems of work and know how to deal with spillages and releases to air.
- Ensure environmental legislation is integrated into the design and operation of new plant and equipment brought into the department and when current production methods are revised. In addition, ensure compliance with all existing regulations and procedures.

3.5 Shift Managers

Each Shift Manager reports to the Departmental Managers for the implementation of the Environmental Policy in the area under their control. In particular, it is a Shift Manager's responsibility to:-

- Ensure that housekeeping is of a high standard
- Ensure that employees under their control receive adequate environmental training,

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instruction and supervision. To ensure that personnel know the rules, regulations and any working procedures applicable to their work. Special attention must be given to new employees.

- Ensure that all employees under their control know what to do in case of spillage or any other release to the environment and know the location of, and how to use spill equipment where necessary
- Ensure that all plant and equipment is in good condition for use, particularly before being accepted back into service after maintenance
- Investigate all incidents promptly to discover their cause and to prevent their Recurrence

3.6 Scrap Yard Managers

The Scrap Yard Manager is responsible for ensuring the guidelines outlined in the Environmental Management System are implemented as part of scrap yard operations. It is their responsibility to:-

- Ensure everyone working at the scrap yard is familiar with the EMS Policy and ensure compliance to the Policy.
- Have knowledge of all key environmental aspects and possible releases to air, water or land associated with their area of supervision
- Provide and maintain safe and reliable plant and equipment; establish and maintain safe systems of work and know how to deal with spillages and releases to air.
- Ensure that housekeeping is of a high standard.
- Ensure that employees under their control receive adequate environmental training, instruction and supervision. To ensure that personnel know the rules, regulations and any working procedures applicable to their work. Special attention must be given to new employees.
- Ensure that all employees under their control know what to do in case of spillage or any other release to the environment and know the location of, and how to use spill equipment where necessary.
- Ensure that all plant and equipment is in good condition for use, particularly before being accepted back into service after maintenance.
- Investigate all incidents promptly to discover their cause and to prevent their recurrence.

3.7 Individual Responsibilities

The effectiveness of the Environmental Policy requires the active co-operation of employees at all levels. All employees have a duty to act with reasonable care and must:

- Adhering to company procedures and instructions for securing environmental compliance
- Working efficiently and not wasting resources, such as raw materials, energy and water.
- Reporting to line manager of any uncontrolled releases to the environment or unsafe conditions that have led or may lead to an incident

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- Co-operation in the investigation of incidents with the object of introducing measures to prevent recurrences
- Maintaining good standards of housekeeping

3.8 Visitors and Contractors

- Adhere to the company environmental and safety procedures and instructions given by personnel implementing the company Environmental Policy and Health and Safety Policy
- Not to work on the premises until they have received the appropriate induction and familiarised themselves with the relevant environment and safety rules and read, understood and accepted and where appropriate supplied with a 'Permit To Work'
- Not to work on the premises unless covered by insurance against risk.

3.9 Environmental Co-ordinators

Environmental Co-ordinators in each of the three production areas are responsible for the day to day implementation of the environmental management system and conducting a review of the environmental action tracker. The Environmental Co-ordinators are to act as a conduit between the Environmental Department and the EMS Teams to convey concerns and feeding back to ensure that communication is maintained.

3.10 Area EMS Teams

Manage EMS meetings at plant level with records on:-

- Record attendees and apologies
- Outstanding actions
- Review of walkabout
- Regulatory performance and improvement items
- Other regulatory issues
- Objectives and Targets (action plans & person responsible required)
- Other Key Performance Indicators
- Environmental Scorecard (incidents, communications, non-conformity, corrective and preventive actions)
- Emergency preparedness and response
- Audits (internal and external)
- EMAS
- Legislative updates
- Outstanding actions
- Community/Employee Engagement
- AOB

These meetings will be held monthly at the three business units.

4. IMPLEMENTATION

4.1 General

The CELSA EMS has been developed based on a series of flowchart based procedures, where practical, held and maintained electronically, supplemented by a proactive internet based database. The procedures and policy are maintained within the company server. EMS documents can be accessed through the EMS webpage and within W drive/CMS Public/Environmental.

4.2 Documentation

Procedures, in support of this Environmental Management System, fall into two distinct categories:-

- Stand alone procedures i.e. those that have been developed specifically to support the Environmental Management System
- Existing as part of the Quality/Safety Management Systems and have been amended to include environmental considerations.

4.2.1 Environmental Manual CP/A002

This document is the top level document of the environmental system and defines the following

- Environmental Scope & Policy
- Environmental Responsibilities
- Environmental Structure
- Structure of Documentation

4.2.2 Initial Review

Generated to manage and collate data from the Initial Review process.

4.2.3 Environmental Aspects Procedure CP/B028

The procedure details the methodology for assessing an environmental aspect's level of significance and who is responsible for the detailed stages of this process. The register is maintained on w:\cms public and is accessible through the EMS webpage.

4.2.4 Compliance Obligations CP/B029

The procedure details the methodology for determining the compliance obligations associated with CELSA Manufacturing (UK) Ltd. and the responsible persons for the detailed stages of this process. The evaluation of compliance with these requirements are also managed through this procedure. The legal compliance register inputs are generated and maintained by an external environmental consultancy who will advise the management representative of current and pending changes and how these obligations apply to the company. These inputs are transferred to and maintained within the Environmental Management System and are accessible through the EMS webpage.

Compliance obligations are discussed with the General Manager on a monthly basis and also

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reviewed with Senior Management at the annual management review.

4.2.5 Objectives & Targets CP/B030

The procedure details the methodology for determining whether a significant aspect will be managed by an objective and subsequent targets or procedure and the responsible persons for the detailed stages of this process. The Objectives & Targets will be managed and reviewed in the monthly EMS meetings. The Objectives & Targets are set in the Annual Management Review.

4.2.6 Operational Control CP/B031

One set of procedures encompassing the common elements of the three business areas **and scrap yards**, with additional “site specific” requirements are detailed where necessary and/or environmental impacts dictate.

4.2.7 Emergency Operating Procedure CP/B032

This procedure details the potential emergency situations and accidents that may arise from CELSA’s activities and which may have an impact on the environment. This procedure includes how CELSA will respond to such incidents and prevent or mitigate associated environmental impacts.

4.2.8 Management Review CP/B004

This procedure details the requirements for CELSA’s annual EMS Management Review and incorporates the requirements of ISO14001 to ensure it’s continuing suitability, adequacy and effectiveness, as well as opportunities for improvements or the need for changes. This procedure also details the required reviews and the responsibilities associated.

4.2.9 Training & Competence 621.01 Human Resources (Training)

This procedure detailing all aspects of training needs associated with the business. Procedure covers induction, refresher, contractor and specialist training requirements associated with specific roles. There is a specific training list associated with the implementation and maintenance of the company’s ISO 14001 Environmental Management System and other associated environmental training requirements.

4.2.10 Control of Documents 423.01

The Document Control procedure is a combined Quality, Environmental and Health & Safety system which utilises a computer based solution with the documents in “Public Folders” being in PDF electronic format. This procedure details the process used to establish and maintain documents.

4.2.11 EHS Internal Audits CP/B099

Environmental and Health and Safety audits have a combined three year schedule, which is located in CMS public/Environmental/Audit Support Data. Internal Audit reports and subsequent actions are held within ProSafety.

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4.2.12 Preventative and Corrective Actions CP/B026

This procedure establishes the system for dealing with actual and potential non-conformities and for taking preventive or corrective action relating to the Environmental Management Systems. Actions taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered.

4.2.13 EHS Communications CP/B033

This procedure details the actions and responsibilities associated with the management of both internal and external communications.

4.2.14 Control of Records 424.01

The identification of Environmental Management System records and their retention period are incorporated in the existing ISO 9000 procedure for the control of records.

4.2.15 Control of Monitoring and Measuring Devices 760.01

Monitor and measure activities associated with the Environmental Management System are detailed in 760.01.

4.3 System Implementation

The implementation and maintenance of the CELSA EMS is intranet based and supported by CELSA IT department in Spain. Documents are held within w:\cms public and are accessible through the EMS webpage.

4.3.1 System Configuration

The CELSA server will be used to store, prompt and log actions giving a high degree of visibility as to the business compliance. The areas supported by the system are:-

- Legal Other Requirements
- Aspects Register
- Objectives & Targets
- Audit schedules, reports and NCR's
- System Corrective/Preventative Actions
- Monitor & Measure
- Documentation Control

4.3.2 Data Management

It is the responsibility of the Management Representative to ensure that data is maintained in a timely manner and to resolve any resource conflicts associated with this process. The data will be maintained by the EMS teams, who will be supported, where queries arise, by the Environmental Advisor and/or Environmental Co-ordinators where appropriate.

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5. DOCUMENTATION

ISO 14001 Document & Correspondence Matrix			
ISO 14001:2015 Standard		CELSA Document	
Title	Clause	Title	Ref.
<u>Context of the organization</u>	4		
Understanding the organization and its context	4.1	Environmental Manual	CPA002
Understanding the needs and expectations of interested parties	4.2	Environmental Manual	CPA002
Determining the scope of the environmental management system	4.3	Environmental Manual	CPA002
Environmental management system	4.4	Environmental Manual	CPA002
<u>Leadership (title only)</u>	5		
Leadership and commitment	5.1		
Environmental Policy	5.2	Environmental Policy	CPA004
Organizational roles, responsibilities and authorities	5.3	Environmental Manual	CPA002
<u>Planning (title only)</u>	6		
Actions to address risks and opportunities (title only)	6.1	Management Review	CPB004
General	6.1.1	Environmental Manual Environmental Aspects Register Environmental Legal & Other Requirements	CPA002 CPB028 CPB029
Environmental aspects	6.1.2	Environmental Aspects Register	CPB028

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ISO 14001:2015		CELSA Document	
Title	Clause	Title	Ref.
Compliance obligations	6.1.3	Environmental Legal & Other Requirements	CPB029
Planning action	6.1.4	Environmental Legal & Other Requirements Environmental Aspects Register	CPB029 CPB028
Environmental objectives and planning to achieve them	6.2	Environmental Objectives and Targets	CPB030
Environmental objectives	6.2.1	Environmental Objectives and Targets	CPB030
Planning actions to achieve environmental objectives	6.2.2	Environmental Objectives and Targets	CPB030
<u>Support (title only)</u>	7		
Resources	7.1	Environmental Manual	CPA002
Competence	7.2	Human Resources	621.01
Awareness	7.3	Human Resources	621.01
Communication (title only)	7.4	EHS Communications	CPB033
General	7.4.1	EHS Communications	CPB033
Internal Communication	7.4.2	EHS Communications	CPB033
External communication	7.4.3	EHS Communications	CPB033
Documented Information	7.5	Environmental Manual	CPA002
General	7.5.1	Environmental Manual	CPA002
Creating and updating	7.5.2	Controlled Document Distribution Control of Records	CPB078 424.01
Control of documented information	7.5.3	Controlled Document Distribution Control of Records	CPB078 424.01
<u>Operation (title only)</u>	8		
Operational planning and control	8.1	Operating Procedures	CPB031
Emergency preparedness and response	8.2	Emergency Operating Procedures Emergency Action Plans	CPB032 ECP 34
<u>Performance evaluation (title only)</u>	9		
Monitoring, measurement, analysis and evaluation	9.1	Control of Monitoring & Measuring Devices Monitor and Measure	760.01/CPB 017 CPB035
General	9.1.1	Control of Monitoring & Measuring Devices Monitor and Measure	760.01/CPB017 CPB035
Evaluation of compliance	9.1.2	Environmental Legal & Other Requirements	CPB029
Internal Audit	9.2	EHS Internal Audits	CPB099
General	9.2.1	EHS Internal Audits	CPB099
Internal Audit Programme	9.2.2	Internal Audit Schedule	TBC
Management review	9.3	Management Review	CPB004
<u>Improvement (title only)</u>	10		

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May 2020

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General	10.1	Control of Monitoring & Measuring Devices Monitor and Measure EHS Internal Audits Management Review	760.01/CPB017 CPB035 CPB099 CPB004
Nonconformity and corrective action	10.2	Preventative and Corrective Actions	CPB026
Continual improvement	10.3	EHS Internal Audits Management Review	CPB099 CPB004

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CELSA Manufacturing (UK) Limited Organisational Structure

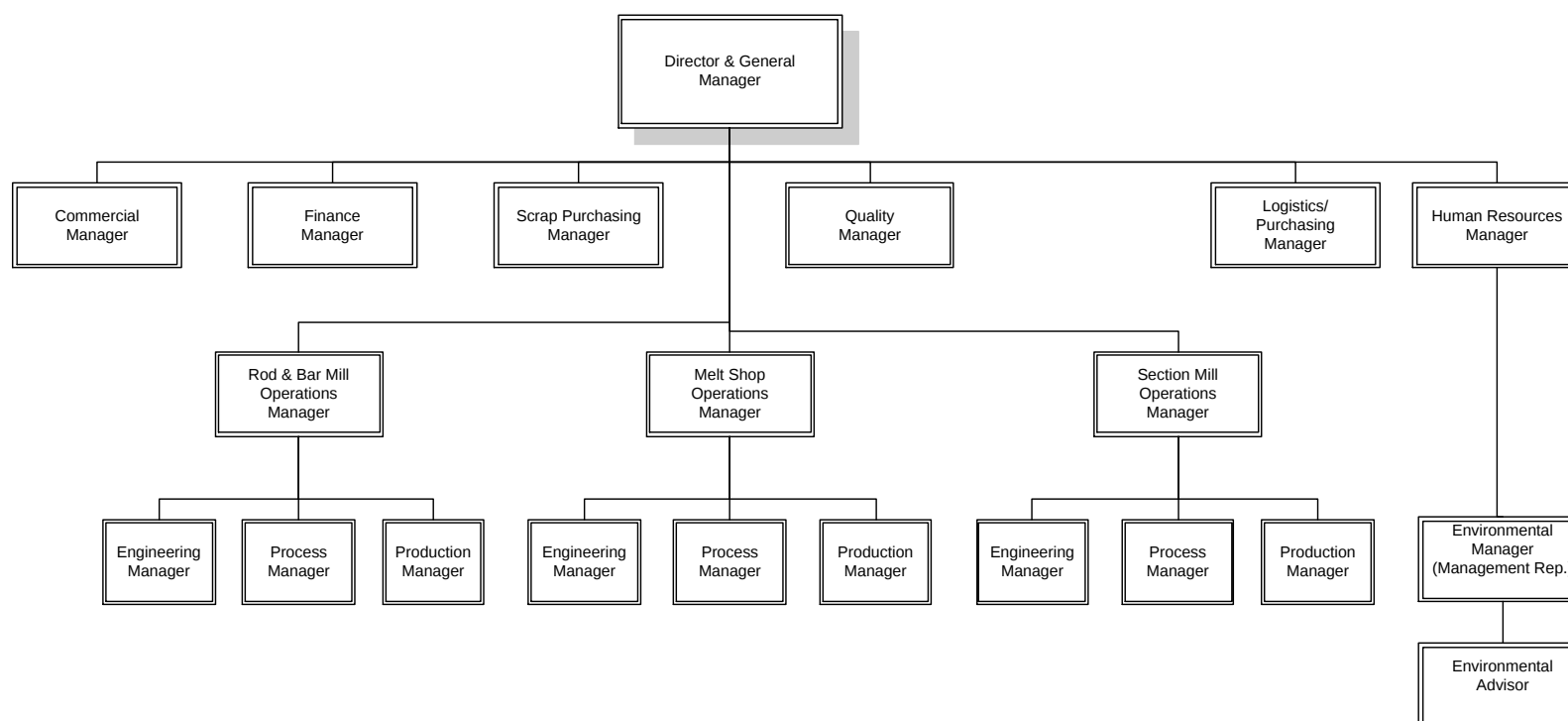


Figure 1

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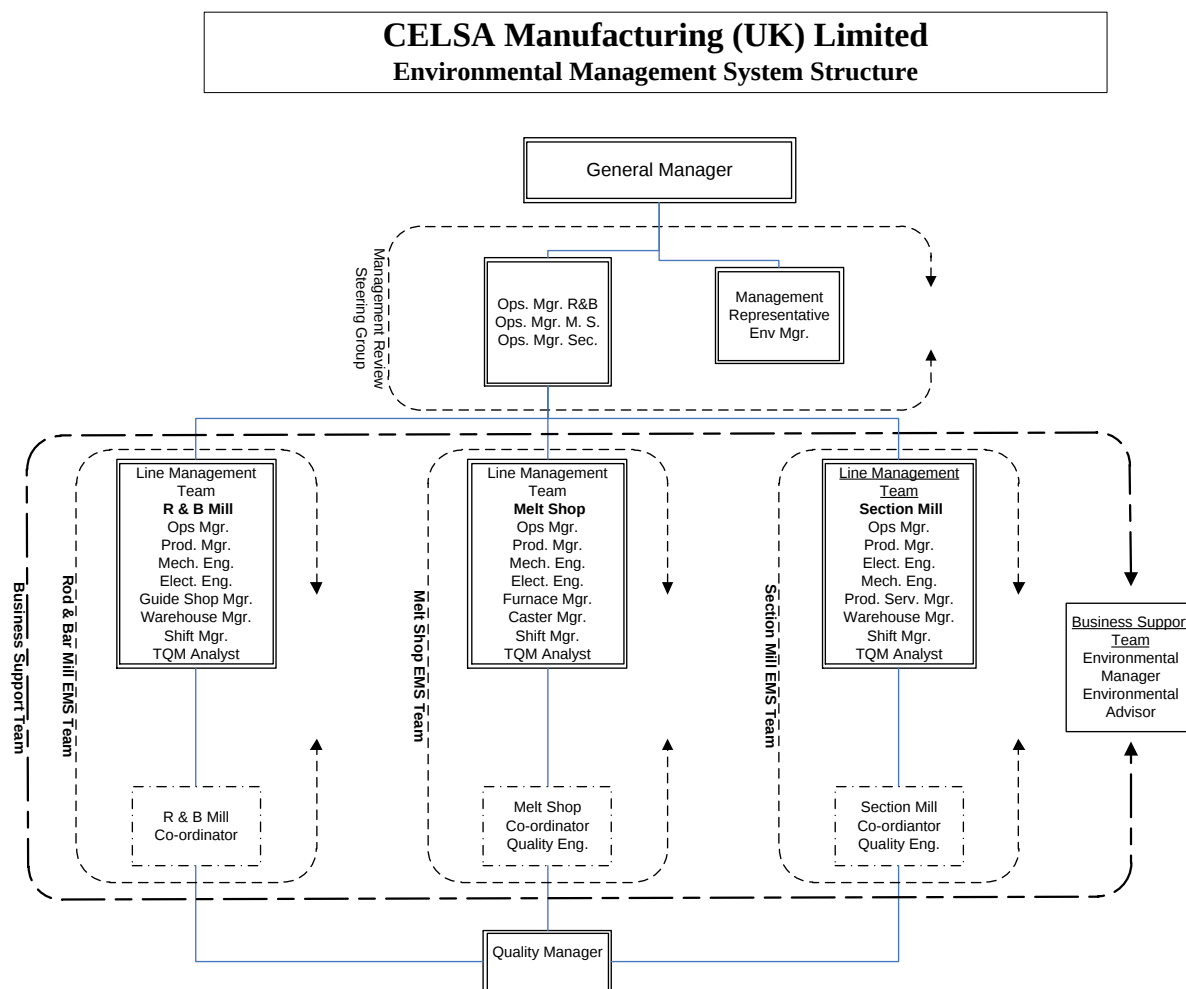


Figure 2

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EMS Overview

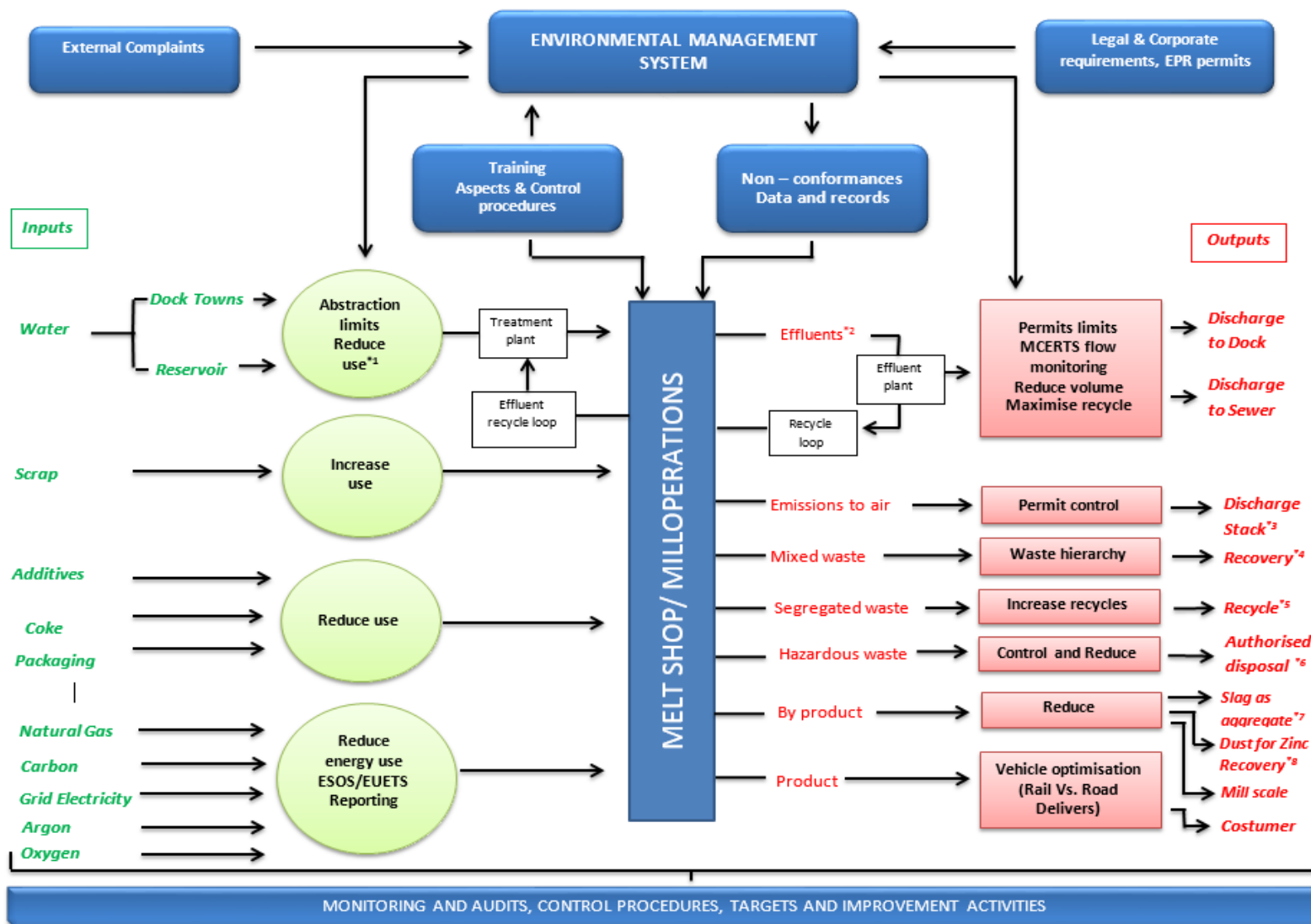


Figure 3

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References		Permit	Reference site	Licence	Procedure
*1	Abstractions	EPR/TP3639BH (Melt Shop)	Point A(Abstraction licence Map)	Abstraction licence serial No. 21/57/25/0078	ECP3
		EPR/BV07591C (Rod &Bar Mill)	Point A (Abstraction licence Map)	Abstraction licence serial No. 21/57/25/0048	
*2	Effluent	EPR/TP3639BH (Melt Shop)	S1, S2,S3	Trade Effluent Consent No. TE147G	ECP3
		EPR/BV07591C (Rod &Bar Mill)	S1	-	
		BV 0767 (Sections Mill)	S1	Trade Effluent Consent No. TE147F	
*3	Emission to air	EPR/TP3639BH (Melt Shop)	A1	-	ECP12 , ECP22
		EPR/BV07591C (Rod &Bar Mill)	A1, W1		
		BV 0767 (Sections Mill)	A1		
*4	Mixed waste	EPR/TP3639BH (Melt Shop)	All Areas	-	ECP14
		EPR/BV07591C (Rod &Bar Mill)			
		BV 0767 (Sections Mill)			
*5	Segregated waste	EPR/TP3639BH (Melt Shop)	All Areas	-	
		EPR/BV07591C (Rod &Bar Mill)			
		BV 0767 (Sections Mill)			
*6	Hazardous Waste	EPR/TP3639BH (Melt Shop)	All Areas	-	
		EPR/BV07591C (Rod &Bar Mill)			
		BV 0767 (Sections Mill)			
*7	Slag as aggregate	EPR/TP3639BH (Melt Shop)	Melt Shop	-	ECP8
*8	Dust for zinc Recovery	EPR/TP3639BH (Melt Shop)		-	ECP7
*9	Mill Scale	BV 0767 (Sections Mill)	Section Mill	-	ECP25
		EPR/BV07591C (Rod &Bar Mill)	Rod &Bar Mill		
*10	Scrap Operations	EPR/TP3639BH (Cardiff)	All Areas	-	ECP52, ECP53, ECP54
		EPR/AB3891FT (Swansea)			ECP39, ECP40, ECP41
		SR2015 No14 (Rotherham)			ECP45, ECP46



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