SPTS ACCIDENT MANAGEMENT PLAN

The SPTS Accident Management Plan is a signpost document that consists of a number of environmental and safety policies, procedures and related documents. It is used to indicate which documents are used and referenced with respect to the management of any Accident or Incident. The referenced documents include, but are not limited to:

- Environmental Management Manual C60-1031281
- Environmental Emergency Response C60-1031283
- Fire evacuation Procedure 1555197887-6
- Gas evacuation Procedure 860-1035569
- Breathing Apparatus (BA) Procedure 860-1035555.
- Reporting and Investigation of Accidents, Incidents and Near Misses 1555197887-5
- Aspects Register 252865407-6
- Communications Procedure 950390536-5
- Site Protection & Monitoring Plan 950390536-6
- Business Continuity Plan

SPTS is certified to ISO 14001 and ISO 45001 and, as a result, is externally audited.The auditing is currently undertaken by BSI in regard to our operational control and systems management.

In addition a senior management review is held on an annual basis whereby items such as compliance obligations, significant aspects and impacts, reactive and proactive monitoring systems, and objectives and targets are discussed at the highest level. Near misses, incidents and accidents - as well as preventative and corrective actions - are also reviewed and discussed.

SPTS holds quarterly EHS committee meetings with employee representatives from across the workforce. There are also monthly reviews for action tracking and progress reports. Contractors to the site are subject to SPTS contractor management procedures and work permit procedures and are trained in site safety and waste management.

The testing of emergency procedures also takes place and is done in multiple ways. These range from regular, scheduled tests undertaken on individual elements of the detection and evacuation system through to full system tests and site evacuations, the latter being carried out much less frequently but at least annually.

Site evacuations are managed by suitably-trained Incident Controllers. All such incidents are investigated and recorded, with preventative and corrective measures put in place as required. There is also a full team of trained First Aiders and an Emergency Response/Breathing Apparatus (BA) Team who are trained to assist with the control of emergency situations.

In the event of a fire, the site's two attenuation ponds will be used to maintain control of fire run-off water. During an incident, fire run-off water will be permitted to enter the upper pond via the surface water drainage system where it will be held pending further assessment. At the same time, the pond level will also be monitored. Where the upper pond is at risk of over-

topping into the lower attenuation pond, the site's approved drainage company will be contacted to assist in the removal of excess water, thereby preventing any potentially contaminated water being released from the business premises.

SPTS has not experienced any significant spillages or releases and the company is aware of its duty to report such incidents should they arise.

Apart from liquid nitrogen and oxygen, it should be noted that only small quantities of inert, flammable and toxic gases are used on site, as well as some corrosive liquid substances for R&D purposes and for the demonstration of SPTS tools. The manufacturing areas use only inert gases in their assembly and build operations. As the quantities of substances used throughout the site are considered small, they are deemed to present minimal risk to the environment.

A Drager gas detection system is in place in order to alert SPTS of any unintended gas releases. Detection levels are set at 'safe' levels below the corresponding Workplace Exposure Limit so that immediate investigatory work can be undertaken before any serious situation occurs.

The Drager gas detection system monitors the extract systems, the service chase, and the research and development clean rooms.The system is maintained annually by Drager Gas Systems Ltd. Additionally, the Drager detection heads are continuously self-monitored by the system display screen.

It should be reiterated that the relatively small quantities of materials used at the site - combined with the early detection systems and intrinsic interlinking of these - should all combine to negate any chances of serious environmental incident.

During incidents, contaminated fire water can pollute the environment through direct run-off into a water body or by entering drainage systems. It is therefore important that any excessive fire run-off water generated during an incident is controlled.

Details on the actions to be taken by the Incident Controller in such an event are documented in Fire Evacuation Procedure DOCID-1555197887-6.