

Procedure No. HSEMS-M 01	Health & Safety and Environmental Management System	Level 1 Issue G	Issue Date 12.11.12	Page 1 of 12
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Health & Safety and Environmental Management System Manual

Issue	Description	Date
A	Initial draft Release	26.01.05
B	Changes to initial draft	24.10.05
C	Revised to incorporate Health & Safety and to bring format in line with ISO14001 and OHSAS18001 requirements.	14.11.06
D	Scope revised to bring it in line with the Environmental Policy. Evaluation of Compliance added as previously missed.	2.04.07
E	Section 4.2 Policies modified – to reflect the new corporate policies issued and signed by Timet's President.	25.09.08
F	Section 1. Scope changed to indicate that the Policies are now signed by the UK Operations Director. Section 4.2 changed to include reference to the UK Policies.	15.05.12
G	Definitions updated to include the definition of "Record".	12.11.12

IMPORTANT NOTE

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This Health & Safety and Environmental Management System (HSEMS) document is readily available on Timet's intranet.

All HSEMS documents are maintained and controlled in accordance with the procedures of the company's quality management system.

Procedure No.	Health & Safety and Environmental Management System	Level 1	Issue Date 12.11.12	Page 2 of 12
HSEMS-M 01		Issue G		

CONTENTS

Page #

1.	Scope	
2.	Introduction	
3.	Terms and definitions	
4.1	General Requirements	
4.2	Policies	
4.3	Planning	
4.3.1	Environmental Aspects and Safety Risks	
4.3.2	Legal & Other Requirements	
4.3.3	Objectives, Targets & Programmes	
4.4	Implementation & Operation	
4.4.1	Resources, Roles , Responsibility & Authority	
4.4.2	Training, Awareness & Competence	
4.4.3	Consultation and Communication	
4.4.4	Management System Documentation	
4.4.5	Control of Documents	
4.4.6	Operation Control	
4.4.7	Emergency Preparedness & Response	
4.5	Checking & Corrective Action	
4.5.1	Monitoring and Measurement	
4.5.2	Evaluation of compliance	
4.5.3	Accidents, Incidents, Non-Conformance & Corrective and Preventive Action	
4.5.4	Control of Records	
4.5.5	Internal HSEMS Audits	
4.6	Management Review	

Procedure No.	Health & Safety and Environmental Management System	Level 1	Issue Date 12.11.12	Page 3 of 12
HSEMS-M 01		Issue G		

1. **Scope**

Timet UK Ltd has implemented a Health & Safety and Environmental management system (HSEMS) that is based on the requirements and structure of ISO 14001:2004 and OHSAS 18001.

The HSEMS is applicable to all production and administration activities undertaken in Timet's UK sites at Waunarlwydd and Witton. The HSEMS implements both the company's Health & Safety and Environmental Policies that are issued and signed by Timet UK's Operations Director.

Timet UK is the premier titanium mill product producer in Europe, with processes that include vacuum melting and forging of titanium and other special alloys in all forms, heat treatment, machining, grinding, rolling, water jet cutting and pickling.

Timet UK supplies Titanium products and materials, primarily to the Aerospace industry and consequently materials undergo testing and laboratory analysis.

To support its Customer's needs, both plants operate various shift patterns that extend through and into the weekend.

2. **Introduction**

In aiming to achieve sound Health & Safety and Environmental performance Timet UK Ltd has recognised the need for a systematic approach to HSE management and the continual improvement of such an approach. Therefore, it has devised a Health & Safety and Environmental Management System (HSEMS), to provide a consistent process for addressing Health & Safety and Environmental concerns through the allocation of resources, the assignment of responsibilities and the ongoing evaluation of practices, procedures and processes. The Management System has been created with the use of current programs, policies and procedures.

The purpose of this manual is to act as a signposting document to other Health & Safety and Environmental management system documents. The HSEMS documents have the following tiered structure:

- Level 1 :** HSEMS Manual – Summarizes how Timet UK comply with requirements of ISO14001 and OHSAS 18001.
- Level 2 :** HSEMS core procedures describe in detail how the Management system defined in the Manual are implemented.
- Level 3 :** Operational controls (e.g. Work Instructions / checklists / forms) relating to managing Health & Safety risks and Environmental aspects of site activities/operations.
- Level 4 :** HSE records and reports.

Procedure No.	Health & Safety and Environmental Management System	Level 1	Issue Date 12.11.12	Page 4 of 12
HSEMS-M 01		Issue G		

3. **Definitions**

Accident

Undesired event giving rise to death, ill health, injury, damage, environmental impact or other loss

Audit

Systematic examination to determine whether activities and related results conform to planned arrangements and whether these arrangements are implemented effectively and are suitable for achieving the organisation's policy and objectives

Continual improvement

Process of enhancing the HSE management system, to achieve improvements in overall SHE performances, in line with the organisation's policies

NOTE the process need not take place in all areas of activity simultaneously.

HSE

Health & Safety and Environmental

HSEMS

Health & Safety and Environmental Management System

Environment

Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.

Environmental Aspect

Element of an organisation's activities, products or services that can interact with the environment.

Environmental Impact

Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisations activities, processes or services.

Hazard

Source or situation with a potential for harm in terms of human injury or ill health, damage to property, damage to the workplace/global environment, or a combination of these

Incident

Event that gave rise to an accident or had the potential to lead to an accident

NOTE An incident where no ill health, injury, damage, or other loss occurs is also referred to as a "near-miss". The term "incident" includes "near-misses".

Procedure No.	Health & Safety and Environmental Management System	Level 1	Issue Date 12.11.12	Page 5 of 12
HSEMS-M 01		Issue G		

Interested parties

Individual or group concerned with or affected by the HSE performance of an organisation

Non-conformance

Any deviation from work standards, practices, procedures, regulations, management system performance etc. that could either directly or indirectly lead to injury or illness, property damage, damage to the workplace/global environment, or a combination of these

Objectives

Goals, in terms of HSE performance, that an organisation sets itself to achieve

NOTE Objectives should be quantified wherever practicable.

Occupational health and safety

Conditions and factors that affect the well-being of employees, temporary workers, contractor personnel, visitors and any other person in the workplace

Organisation

Company, operation, firm, enterprise, institution or association, or part thereof, whether incorporated or not, public or private, that has its own functions and administration

NOTE For organisations with more than one operating unit, a single operating unit may be defined as an organisation.

Record

A document that provides permanent evidence of past events / activities performed, they are usually saved in hard copy (e.g. paper) or electronic format.

Risk

Combination of the likelihood and consequence(s) of a specified hazardous event occurring

Risk assessment

Overall process of estimating the magnitude of risk and deciding whether or not the risk is tolerable

Safety

Freedom from unacceptable risk of harm [ISO/IEC Guide 2]

Tolerable risk

Risk that has been reduced to a level that can be endured by the organisation having regard to its legal obligations and its own HSE policy

Procedure No.	Health & Safety and Environmental Management System	Level 1	Issue Date 12.11.12	Page 6 of 12
HSEMS-M 01		Issue G		

4.2 **Policies**

Timet has a corporate [Health & Safety Policy](#) and [Environmental Policy](#). These Policies have been developed by top management along with the HSE managers and are signed by Timet's President as a means of providing a focus and direction for the Company's HSEMS.

Timet UK Ltd also has UK relevant [Health & Safety](#) and [Environmental Policies](#). These Policies have been developed by top UK management and are signed by the UK's Operations Director as a means of providing a focus and direction for the Company's EHSMS.

The HSE policies clearly define Timet's commitment to ensure that the Health, Safety and Welfare of its employees and any third parties is not put at risk whilst the impact of the site activities upon the Environment is kept to a minimum. The UK Policies are reviewed annually at the Management Review meeting.

The UK policies address specific site Health and Safety risks and Environmental issues by providing a framework for setting and reviewing HSE Objectives and Targets.

The policies are distributed to all employees either directly, by displaying them on notice boards, or at communication meetings. A copy of the UK policies is provided to all new employees as part of the recruitment induction programme.

The policies are made available to public, customers, suppliers and contractors either upon request; as part of the tender/procurement process; or for publicity.

4.3 **Planning**

4.3.1 **Environmental Aspects & Health and Safety Risks**

Timet UK have established and maintained documented procedures for identifying and recording environmental aspects & health and safety risks for all its activities, products and services. Where significant, the safety risks and environmental aspects have been considered in the development, implementation and maintenance of the HSEMS.

These are also considered when introducing new or modified activities, products and services.

4.3.2 **Legal and other requirements**

Timet UK have established and maintained documented procedures for identifying and recording all Health & Safety and Environmental legal and other requirements to which the organization subscribes and are applicable to its activities, processes, products and services.

Procedure No.	Health & Safety and Environmental Management System	Level 1	Issue Date 12.11.12	Page 7 of 12
HSEMS-M 01		Issue G		

4.3.3 Objectives and Targets

Timet UK have established and maintained documented procedures for setting and managing Health & Safety and Environmental Objectives and Targets. Objectives are reviewed whilst considering:

- HSE policies.
- Legal and other requirements
- Significant health and safety risks
- Significant environmental aspects
- Technology options
- Finances
- Operational and Business requirements

Timet's Objectives and Targets are consistent with its HSE policies.

4.4 Implementation & Operation

4.4.1 Resources, Roles and Authority

Company directors have overall responsibility for the provision and maintenance of an effective HSEMS Policy and improvement programme and will, via the UK's Director for Manufacturing, ensure that the requirements of this HSEMS Manual is addressed in all management and business decisions.

Timet UK have established and maintained documented procedures for structure and responsibility within the organisation. The UK's Managing Director is ultimately responsible for the Health & Safety and Environmental performance of Timet UK, and maintains an organisation chart.

Timet UK's management team has the responsibility to identify major Health & Safety and Environmental programmes and activities and to allocate appropriate resources, including human (specialised skills if necessary), technological and financial.

The Director UK Manufacturing shall nominate a Management Representative to carry out the duties of Health & Safety and Environmental Coordinator.

4.4.2 Training, Awareness and Competence

Timet UK have established and maintained documented procedures for ensuring that training needs are identified and that all employees whose work may affect Health & Safety and the Environment are provided with the necessary knowledge and skills to achieve its objectives through appropriate education, training and experience.

Employee recruitment / promotion is based upon competency, comprising expertise, qualification, training and experience. An induction programme provides all new recruits and, if appropriate, contractors with HSE awareness training. Additional, on-the-job training and more specialist formal training, is provided as determined by the employees manager. It

Procedure No.	Health & Safety and Environmental Management System	Level 1	Issue Date 12.11.12	Page 8 of 12
HSEMS-M 01		Issue G		

is the responsibility of managers to identify and address training needs and for maintaining records of training provided.

4.4.3 Consultation and Communication

Timet UK have established and maintained documented procedures for ensuring effective consultation with employees, contractors, visitors and interested parties.

The procedure aims to encourage participation in good HSE practices, and support for the company policies and objectives, from all those affected by its operations.

A two-way dialogue ensures mechanisms for the communication of both HSE documents, and externally received information.

A register of communication has been created to record and manage both internal and external communications and complaints.

4.4.4 Management System Documentation

This manual describes the formal Management System and activities that ensure Health & Safety and Environmental performance. It is designed after the clauses of and to meet the requirements of ISO 14001 and OHSAS 18001. Each section of this manual identifies and references more detailed procedures when appropriate. These in turn may reference instructions, specifications and records as appropriate for further description of how specific activities are performed and evaluated.

Highlighted references indicate [hyperlinks](#) (a fast, electronic method of cross-reference to related documents – usually appearing as blue text). This manual is under the authority of the Health & Safety and Environmental Representative and is approved by the UK's Director of Manufacturing.

The Management system is a 3 tier system,

- Level 1 - Manual – signposting document that is hyperlinked to relevant procedures and describes how Timet UK implement it's HSE Policies and comply with the requirements of ISO14001 and OHSAS18001.
- Level 2 - Procedures – describe in detail the activities and controls Timet UK has in place to conducts it's business in such a manner as to effectively implement it's HSE policies.
- Level 3 - Associated instructions, forms, checklists, tables etc....used to support the implementation of level 2 procedures.

4.4.5 Document and Data Control

Timet UK have established and maintained documented procedures for controlling all documents (hard copy and/or electronic) required by this HSEMS Manual through the HSEMS Procedure for Document Control 4.4.5.

Procedure No.	Health & Safety and Environmental Management System	Level 1	Issue Date 12.11.12	Page 9 of 12
HSEMS-M 01		Issue G		

4.4.6 Operational Controls

Timet UK has established and maintained documented procedures for ensuring that operations and activities associated with significant environmental aspects and safety risks are identified and planned to assure Environmental, Health and Safety performance is achieved in line with it's HSE Policies.

Operations and activities are carried out under specified conditions and where relevant are applicable to third parties who also carry out activities at Timet UK e.g. sub contractors.

4.4.7 Emergency Preparedness and Response

Timet UK have established and maintained documented procedures for the response to accidents and emergency situations that may arise. The plans include procedures to prevent and mitigate Environmental, Health and Safety risks that may be associated with them. The plans also cover individual responsibilities and authority for each emergency situation.

4.5 Accidents, Incidents, Non-Conformance & Corrective and Preventive Action

Non-conformances are classified as a non-compliance with a specific requirement of the HSEMS; an action contravening a specific system or procedure (e.g. breach of a consent condition); an observation which indicates an Health and Safety risk or Environmental aspect not previously identified; a recorded incident/accident; and other situation that contravenes HSE legislation, policy or objectives & targets.

Timet UK have established and maintained documented procedures to measure, monitor and control performance against objectives and targets. This includes compliance with legislation, non-conformance and preventative actions, maintenance of records and HSEMS audits.

4.5.1 Performance Measurement and Monitoring

Timet UK have established and maintained documented procedures for monitoring and measuring its performance to verify that objectives are met, including compliance with relevant legislative and regulatory requirements. Records of monitoring and measurement activities are maintained.

4.5.2 Evaluation of Compliance

4.5.2.1& 2

Timet UK have established, implemented and maintained a procedure to periodically evaluate whether it's sites are complying with applicable legal and other requirements to which it subscribes.

Timet UK will keep records of the results of these evaluation

Procedure No.	Health & Safety and Environmental Management System	Level 1	Issue Date 12.11.12	Page 10 of 12
HSEMS-M 01		Issue G		

4.5.3 Non Conformance and Corrective Actions

Timet UK maintains systems to ensure non-conformances are investigated and that actions are taken to correct and prevent the causes. Systems are in place for investigating and managing all HSEMS corrective and preventative actions.

4.5.4 Records & Record Management

Timet UK have established and maintained documented procedures for records management to demonstrate conformance to specified requirements. These records are available to all regulatory agencies if needed. The HSE Representative, is responsible for co-ordinating the distribution of records to regulatory agencies. Where possible electronic records are held for ease of safe storage and retrieval.

4.5.5 Audit & Review

Timet UK have established and maintained documented procedures for conducting periodic internal audits to determine whether the HSEMS conforms to planned arrangements (including the requirements of EN ISO 14001 and OHSAS 18001), and to determine whether the HSEMS has been properly implemented and maintained in accordance with it's Health & Safety and Environmental Policies.

4.6 Management Review

Timet UK have established and maintained documented procedures for the Management Team and UK Managing Director to conduct the Management Review of the HSEMS to evaluate its effectiveness, adequacy and continued suitability relevant to Company Policy, ISO 14001, OHSAS 18001 and this manual. The Management Team ensures that the information used to revise/improve policies and programmes is provided to carry out this evaluation.

HSEMS Management Review is held on an annual basis and the results of the are documented.