INTEGRATED MANAGEMENT SYSTEM

ISO 9001, 14001, 45001

Authorised: M. Montgomery - Compliance Manager

1. Introduction

Smurfit Westrock Recovered Fiber aims to foster and develop its position as one of the Countries leading paper-recycling companies through profitable growth. We shall differentiate ourselves by the scope and quality of our services and our total commitment to customer satisfaction.

Our success will continue to be built on integrity and a UK wide network of dedicated professional staff. The customer shall be placed first and we aim to provide unrivalled customer service.

2. Mission statement

Our mission is to provide the best quality and service to our customers in the markets in which we operate - in a manner which is sustainable, reliable and consistent.

In doing this we will:
- Produce a superior return to our shareholders by outperforming our competition
- Invest in people, equipment and processes for continuous improvement
- Operate to the highest standards of safety and the environment
- Work in partnership with our suppliers for mutual development
- Inspire in our employees a sense of pride in themselves, their colleagues and the organisation
- Earn respect for our contribution to the community
- Enhance the position of the Smurfit Westrock Group as world leader in paper-based packaging and recycling

2.1 History

Founded in 1917 and becoming part of the Jefferson Smurfit Group in 1976 with an operational unit in Nottingham. This alongside a loose feed facility at Burnley Mill employing a total of 28 personnel handling 7000 tonnes of paper.

In 1988 on a Greenfield site at Tamworth, an operational unit was developed. In 1989 a business at Blackburn was acquired and a further development was undertaken on another Greenfield site at Tamworth on which a Security Shredding Operation was started. In 1991 another business was acquired at Preston and a loose feed operation was started at Snodland Paper Mill.

Further significant changes occurred during 1992 when Smurfit Recycling acquired a business in Glasgow. Head Office was relocated from Nottingham to Tamworth and due to the size of the Company and the need to transport material from all points of the UK, Smurfit Mill Transport was founded.

The Company became the first Paper Recycling Company in England to achieve accreditation to ISO 9000 (then BS 5750). 1996 again found significant changes occurring with the relocation of Head Office, Tamworth Operation and Security Shredding to new accommodation at Tamworth as well as the development of a new site at Whitehaven. The Whitehaven site was relocated due to continued growth in 1998 to Workington.

During 2005 Smurfit Recycling welcomed Smurfit Recycling Dublin operation into the fold which was quickly followed by an international merger with Kappa Paper to form the Smurfit Kappa Group in 2006. As a result of the merger Smurfit Recycling became Smurfit Kappa Recycling and received Kappa's only recycling operation in the UK located in Birmingham.

Following a further review of the groups' requirements in 2014 and Recycling's ability to provide recovered fibre to the UK and European Mills six strategically positioned operations remain.

During 2024 Smurfit Kappa combined with Westrock Co through another international merger to form Smurfit Westrock.

Opportunities for improvement and continued growth are continuously being reviewed.

3. Documentation Layout, Amendment and Control

3.1   Amendments and Control

Date	Page(s)	Change	Issue	Approval
10:05:96	All	Total revision of system	2	RKM
02:07:96	2,5,7,8	Addition of Data Control & New Manuals	2A	RKM
01:03:99	All	Total revision of manual for inclusion of Integrated Management System and ISO9000:2000	3	RKM
01.11.02	All	Accommodation of Management Structure Changes	4	RFS
05.06.03	All	Total revision of manual for inclusion of ISO9000:2000	5	RFS
25.01.05	All	Accommodation of Management Structure Changes	5A	MM
20.06.06	All	Accommodation of merger with Kappa Paper	6	MM
18.10.07	All	Review and Structural change	6A	MM
28.01.09	All	Review and Structural change	6B	MM
15.07.14	All	Review and Structural change	7	MM
05.02.18	All	Total revision of manual for introduction of ISO9001:2015	8	MM
01.09.23	All	Review and Structural change	9	MM
01/09/24	All	Review of system, inclusion of Westrock merger	10	MM
20/08/25	All	Review and structural change	11	MM

This manual is issued to the holder on the authorisation of the Managing Director, to whom all queries should be addressed. The holder of the controlled copy is responsible for the safekeeping and its updating and return when requested to do so.

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4. Context of the organisation

4.1   Understanding the organisation and its context

The company operates globally and procures recovered fiber to create product within the group. The material purchased enters a closed loop cycle as the product created can be recycled again and repurposed.

4.2   Understanding the needs and expectations of interested parties

The company will establish to the extent necessary to ensure customer satisfaction processes for identifying the requirements of customers and potential customers. Consideration will therefore be given to the extent to which customer needs are formally specified.

The Company will define whenever possible the necessity to define details, obligations regarding the product or service, level of confidentially required and records required. Attempts will be made to obtain details regarding the stated and unstated needs of the customer to ensure customer satisfaction and satisfy them on availability of the product or service.

4.3   Determining the scope of the Integrated management system

The scope of the organisation is defined through the Management system and how the business operates globally. How the business is performing is reviewed regularly. The internal and external issues related to the business are discussed and a strategy developed to assessment corporate risks and opportunities. The business will adopt a PDCA (Plan, do, check, act) cycle approach to ensure that targets and objectives are current.

4.4   Integrated management system and its processes

The Quality, Safety and Environmental system is established and covers all areas of the business. Ensuring that the quality and integrity of the service and product not only meet, but where possible, surpass customer expectations. Safety is maintained through thorough risk analysis and evaluation of safety hazards in which risks are minimised so far as practicable.

The underlying philosophy of the system shall be one of prevention and striving towards a zero-harm workplace. The IMS is built upon a three-tier system. The primary manual details the IMS, backed up by a secondary tier consisting of the System procedures and then quality work instructions, safe operating procedures, safe systems of work and environmental instructions. All documentation is subject to review to ensure that it is current and up to date with legislation, guidance and good general practice. This applies to the IMS manual, procedures, risk assessments and applicable safe systems in place.
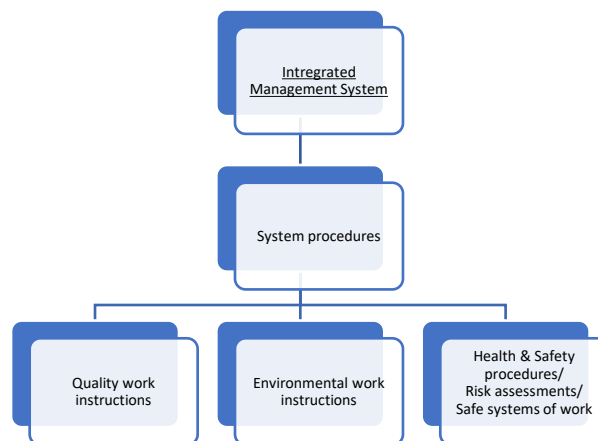
5. Leadership

5.1   Leadership and commitment
Top Management commitment is defined within (IMSP-01) Management Review_1.pdf

5.2   Policies
SWR_Environmental Policy 2025
SWR_Quality Policy 2025
SWR_Safety Policy 2025

5.2.2   Communication of policies
Policies are communicated electronically to all areas of the business and displayed on noticeboards that frequent both employees and visitors to the site. When the policies are reviewed and signed by the Managing director, they are saved on the Sharepoint system and the previous version is archived.

5.3   Organisational roles, responsibilities and authorities
The company Quality, Health and safety and environmental performance is the responsibility of the Managing director, who shall be assisted by staff with individual responsibilities and an executive management team of which consists of:

•   Managing Director
•   Financial Controller
•   Commercial Director
•   Human Resource Manager
•   Compliance Manager
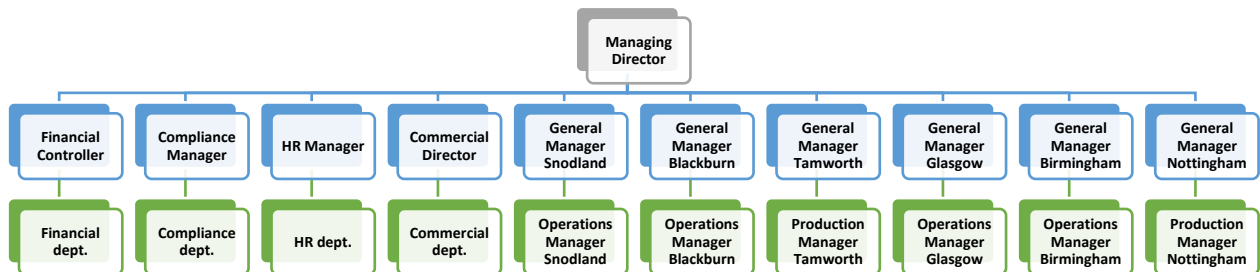
Sharepoint: Organisational chart – Linked with outlook accounts.

5.4   Consultation and participation of workers
The needs and expectations of workers are considered within the Management Review. Feedback from workers is also obtained through internal communication channels such as My Voice, personal reviews and through meetings and consultations.

A worker representative is to be present at meetings that affect or influence worker needs and expectations, this is outlined within HS-25 Safety committee

6. Planning

6.1   Actions addressing risks and opportunities

Risks are identified through a SWOT analysis, live digital registers are available through SharePoint to monitor and update as required. Risks and opportunities (IMSI-06) require appropriate controls to mitigate or to improve upon as outlined in IMSI-01 Integrated Management System Instructions_1.pdf

6.1.1 Considering organisational/ interested parties' requirements

Organisational / interested parties are reviewed during Management review and the SWOT analysis is reviewed. UKP-SWR Compliance - Risk register

6.1.2.3 Actions to address environmental aspects

Environmental aspects and objectives of the business are documented within IMSP-06 Verification, measurement and testing_1.pdf as well as the creation of legislative registers documented within IMSP-12 Legal register_1.pdf

Aspects and impacts Register: UKP-SWR Compliance - Aspects and impacts

6.1.2.4 Hazard identification and assessment of risks

Hazards are identified and assessed by competent persons throughout the business as documented within HS-23_Risk assessment_3.docx and these assessments are available via UKP-SWR Compliance - Risk assessment & UKP-SWR Compliance - Safe systems of work.

Incidents, near misses and hazards are recorded and logged using Sharepoint Near miss & hazard reporting system and are typically investigated by local Management of the location reported. Dependant on severity or actual outcome, additional resources will be provided to supplement the investigation process, this is document within IMSP-18 Safety incident reporting_1 & HS-54_Incident reporting protocol_2.docx

6.2   Quality, Environmental and Health and Safety objectives

The creation, implementation and use of a programme is seen as a key element in the IMS. The programme details how targets will be achieved, timescales and responsibilities for implementation of the policy. Defined objectives will be detailed with measurable specific targets. All objectives are detailed in the programme from planning through to decommissioning.

The objectives derive from consideration of regulatory requirements, the environmental aspects register, the corporate and site environmental policies, requirements of the business and comments from interested parties.

Objectives are set and reviewed at the annual management review meeting. The procedure IMSP-20 Objectives, Targets and Action plans_1.pdf sets out the method for determining annual objectives and targets and their timescales and responsibilities where appropriate.

6.2.1 Action plans and responsibilities

Action plans, performance monitoring and responsibilities are outlined in IMSP-20 Objectives, Targets and Action plans_1.pdf

Central SHEQ action plan: UKP-SWR Compliance - Action plan - Compliance

Local action plans are to be communicated to the Compliance department to be made available on Sharepoint.

6.3   Planning of changes

Any changes to the Management System will be done so in a structured way. The purpose and consequences of any changes are to be identified whilst also ensuring the integrity of the IMS. Stakeholders and interested parties are to be considered and incorporated into the action plan. Should any significant changes to the Management System become identified through audits then Top Management will be made aware and discussed.

7. Support

7.1   Resources

Top Management shall provide the resources required for the implementation and control of the IMS. Resources cover all aspects and includes personnel, training, external assistance, infrastructure, verification, environment, finances and information. When required resources will include the obtaining of expert knowledge. This will ensure suitably trained personnel are available for all areas of Management, performance and verification activities.

7.1.2   People

Top Management has defined the responsibilities, authority and functions of all personnel. This has been communicated throughout the business to ensure and enable effective deployment. These personnel will be adequately trained and supervised. Appropriate procedures and practices ensure the facilitation of co-operation of all personnel.

As appropriate appraisals will be undertaken, the appraisal should be constructive and clear guidance should be given to the employee. Any questions asked should be answered in full by the person undertaking the appraisal and the employee should be given clear and objective guidance. Achievable targets should also be set with designated appropriate timescale

7.1.3   Infrastructure

The business documents, defines, implements and maintains the infrastructure necessary for product and service realisation in the form of its IMS.

7.1.4   Process/ operation environment

Buildings, workspaces, utilities and equipment are provided and is regularly reviewed by Top Management and is documented within (IMSP-01) Management Review_1.pdf

7.1.5   Monitoring and measuring of resources

Equipment such as weighbridges, thermal imaging devices and moisture meters have been identified as required as part of the process and as such are subjected to calibration and maintenance.

7.1.5.1 Measurement traceability

Equipment identified that receives calibration and maintenance will present a certificate of calibration work as proof of validity.

7.2   Competence

Line Managers and Supervisors are to ensure that relevant training requirements are met when new employees are employed or when specialist training is required as documented in IMSP-11 Training_1.pdf

A Training Needs Assessment is completed and reviewed to ensure business needs have been identified and from this assessment a competency matrix is completed by local management. UKP-SWR Compliance - Training List

Records of competency are maintained in accordance with GDPR and are communicated to Human Resource and Compliance departments to update a central competency database. UKP-SWR Compliance - Central Training matrix

Training records are kept on file and for following 7 years after an employee leaves the business. This is documented within IMSP-09 Retention of records _1.pdf .

7.3   Awareness

The Company has a policy of promoting its awareness of its IMS especially regarding communication of information to all personnel.

Managers conduct regular tours, inspections and audits within their areas of authority to demonstrate management commitment to the IMS. Team briefs and team talks are given on a regular occasion, Management for continuous improvement (MFCI) / Safety meetings are held on a regular basis and other similar tools such as noticeboards, bulletins, newsletters surveys and questionnaires are used as appropriate.

7.4   Communication

As an addition to Management Review there will be in place a Company Safety Committee, which is a cross-operational participation group chaired by the Managing Director or Operations Director.

On each site regular meetings will take place with employee committees to discuss MFCI and Health and Safety. Information is disseminated down through the meetings and in return feedback communicated up through the meetings. Communications are cascaded down and dispersed amongst the relevant departments and any complaints made are documented and responded to in a timely manner. Incidents concerning the sites Health and Safety performance are dealt with in line with procedure *IMSP-20 Objectives, Targets and Action plans_1.pdf* in which corrective actions are implemented.

The agendas of Site Meetings will appropriately include all aspects of quality, health and safety and environmental matters covered by the IMS. Any actions from meetings shall be documented and adequate corrective action should be taken and reported back.

7.5   Documented information

The Company has documentation in place to cover all aspects of the IMS. This documentation allows all processes to be systematically and consistently managed and includes but is not limited to;

- The Health and Safety, Quality and Environmental policies and how this relates to objectives, targets and management programmes.
- Organisational roles and responsibilities.
- How the system elements interact.
- The relationship between documents.
- Site emergency plans
- Organisation roles and responsibilities.

The documentation details information and operating criteria and covers all areas where the absence could adversely affect the Quality, Safety or Environmental aspects of the task. The range and detail covered by the documentation is dependent on the complexity of task, methods employed and the skills and training needed by the personnel involved

7.5.2   Creating and updating

Any individual requiring a change in documentation shall present the Management Representative with a statement of reason for change requirement. The reason for change will be reviewed where possible by the initial authorising individual. On approval the necessary documents will be reissued and the obsolete documentation will be replaced with the current version. A Document control register is available on Sharepoint which holds previous versions, this register is only accessible by the Compliance Manager or their delegated responsible persons.

7.5.3   Control of documented information

The business has established and maintained procedures, instructions and data for all activities covered by the IMS. Their location will be known by all. The current version of relevant documentation will be available and will be made easily available where essential to the task in hand.

Periodic reviews, revisions and approval for adequacy by suitably qualified and authorised staff will be undertaken. Obsolete documentation will be removed from the area of issue unless there is a need to retain it for legal or knowledge preservation purposes, in which case it will be suitably identified to prevent unintended use.

The Compliance Manager is responsible for the periodic review and revision, if necessary of this manual and any other associated procedures and instructions. Issue of new or revised documents follows the requirements of established procedures outlines in _IMSP-03 Document control_1.pdf_. No element of the system documentation may be altered or amended without the consent of the Compliance Manager.

Document control registers are below:

UKP-SWR Compliance - Document control

UKP-SWR Compliance - Forms

UKP-SWR Compliance - Safe systems of work

UKP-SWR Compliance - Risk assessment

8. Operation

8.1 Operation planning and control

Smurfit Westrock Recovered Fiber has defined, planned and documented all processes that affect the quality, safety and environmental aspects of the business. At all practical stages of any process the significant parameters are defined. At all stages the methods used to control any critical processes is documented in a format that can be easily understood. Inputs and outputs will be defined and managed using UKP-SWR Compliance - Aspects and impacts and all routine tasks documented under Safe systems of work. Non-routine tasks will subject to dynamic risk assessments and are to be controlled under a permit to work.

Process controls are defined within IMSP-05 Process control_1.pdf

8.2 Emergency preparedness

Under emergency situations, each site will refer to their Emergency response plans. Each site will have dedicated first aiders and fire marshals that have received adequate training from an external provider.

Drills are conducted on sites to evaluate the effectiveness of the emergency response plans and are reviewed annually.

Instances of fire, emissions to land/water/air or specific health and safety events are to be reported and recorded using the Sharepoint Incident reporting system.

8.2.1 Customer communications

The business has in place contacts with customers. These contacts are to the extent necessary to support the needs of the customer. All points of communication must be considered including product and service information, enquiry and order handling, receipt and processing of customer order amendments. Communication methods include visits upon request; phone calls, emails, letters and meetings when required. Communication through electronic means is also available through the company website.

Literature on our services can also be provided. Customer feedback, complaints and reports especially regarding non-conformities should be expedited immediately, and when appropriate feedback on performance. KPIs are measured through the absence of complaints and performance is deemed satisfactory in the absence of complaints made around the product or services supplied. Records of complaints are filed on site and are to be actioned and reviewed on an annual basis. This is documented within *IMSP-14 Communication and complaints_1.pdf*

8.2.2 Determining the requirements for products and services

The requirements of products and services is detailed within IMSP-02 Contract review_1.pdf

8.2.3 Review of the requirements for products and services

IMSP-16 Approval of new, modified products, processes or equipment_1.pdf

8.2.3.1 Ability to meet expectations/ requirements

The ability to meet expectations and requirements is detailed within IMSP-02 Contract review_1.pdf

8.2.4 Emergency preparedness and response

Each site will hold an emergency response plan that will be reviewed annually to ensure it is current. The plans will be the responsibility of the General Manager to ensure they sufficient cover emergency procedures. Copies of the Emergency response plan are to be held on site

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8.3   Design and development of products and services

SWR shall be seen as exempt from clause 8.3.1 Design and development of products and services to clause 8.3.6 Design and development changes as the product manufactured is dictated to SWR by an industry standard (customer requirements and the design of specialised equipment.

Any decisions regarding acceptable designs and development will therefore be decided by an external organisation meeting on the industries behalf. Any alterations to the current standard will be communicated by the organisation to SWR where this will be considered before any further baling equipment is purchased. As we are obliged to meet the required standard set by the customer to supply, such exclusions will not affect the organisation's ability or responsibility to provide product that meets customer and regulatory requirements

8.4   Control of external processes, products and services

The business manages its processes, products and services detailed within IMSP-05 Process control_1.pdf. Production controls (IMSI-03) and Transport controls (IMSI-04) are detailed IMSI-01 Integrated Management System Instructions_1.pdf

8.5   Production and service provisions

All production and service undertaken by the Company is planned and controlled to ensure consistent process capability which will result in customer requirements being met and whenever possible exceeded.

Whenever possible the Company will use and supply suitable equipment and environmental conditions to ensure the integrity, quality, safety and environmental aspects of the process and/or service. Detail shall be documented, trained in and be available to state the criteria required for workmanship. To allow the points noted above and to ensure the quality, safety and environmental aspects of the process, service, individuals as well as plant and equipment consideration will always be given to the availability and use of the following:

a)   Inspection, measuring and test equipment.

b)   Verification and storage (including customer supplied products).

c)   Identification and traceability.

d)   Handling methods and supply of handling equipment.

e)   Storage facilities (including presentation and segregation).

f)   Control of non-conforming product.

g)   Control and release.

These should all be applied as a minimum to ensure the quality, safety and environmental aspects of the process or service until such times that it is no longer the responsibility of the company.

8.5.1 Control of production and service provisions

Documented procedures and instructions are in place for all activities within the boundaries of the IMS that have an impact on quality, health and safety and environmental aspects of the process.

Details regarding planning and production is documented with regard to the process where quality, safety and environmental aspects can be affected, including maintenance of equipment,

which will ensure continued process capability. At all stages criteria for workmanship will be stipulated.

IMSP-19 Waste_Management_1.pdf documents the processes undertaken to ensure duty of care is achieved.

8.5.2   Product identification and traceability
Procedures and instructions detail the methods of identification and levels of traceability throughout all areas covered by the IMS. Analysis should be conducted to establish the degree of product/service traceability. The product/service shall be identified to the extent necessary to facilitate traceability. Where information is required for safe use of a product or item this shall be supplied as a minimum

8.5.3   Property belonging to customers or external providers
Property or equipment that is leased to the company by an external provider will undergo routine preventative maintenance and servicing and every effort will be made to ensure that the equipment is free from damage or wear and tear.

Material procured will be under local or national contract specific to each site and will remain the property of the customer until acceptance has been made by the site receiving. Once recoverable fiber has been processed, it then becomes the property of the company and payment made to the customer.

8.5.4   Preservation
Products are stored by grades or material types and are to be easily identifiable so that the correct product is collected for the customer. All products produced by site will be stored on site to prevent damage or loss. Raw materials (Recovered fiber) are to be processed as soon as possible to both create the products and to reduce the risk of contamination/ non-conforming product. Baled materials are handled using dedicated mobile plant. The mobile plant equipment will be fit for purpose and undergo schedule preventative maintenance.

No packaging is used on the products created other than bale labels, which are used to identify the manufacturer of the bale. These bale labels are dedicated to each cost centre.

Vehicles are essential to Smurfit Westrock Recovered Fiber operation and are an integral part of the service provided by the Company through collections and delivery of material. All vehicles are operated, maintained and inspected accordingly to documented instructions and current legislation. Preventive Maintenance plays a key part in the Companies role of providing transport for service

8.5.5   Delivery and post delivery
IMSP-10 Material control_1.pdf that defines the activities involved with storage, delivery and post delivery services. Installation of plant and equipment and the subsequent maintenance of equipment, training and monitoring are the general post delivery services carried out. Where Smurfit Westrock Recovered Fiber has plant and equipment at customer premises, suitable maintenance agreements will be set up.

When the maintenance is the responsibility of Smurfit Westrock Recovered Fiber then competent staff will be supplied or contracted to carry out maintenance. The Company will also provide personnel for the customer to contact if a problem arises. Feedback is obtained from all such activities to help with maintenance schedules and preventive maintenance.

8.5.6 Control of changes

Any process changes, including the introduction of new equipment or changes to the mode of operation of existing equipment shall be introduced according to documented procedures.

This documentation shall identify all the parameters that need to be assessed including all quality, health and safety and environmental aspects. The individual responsible for approving such changes shall be clearly identified.

Changes to the product, activities or services may be discussed within the Management review.

8.6   Release of products and services

IMSP-10 Material control_1.pdf defines the activities involved with storage, delivery and post delivery services. Installation of plant and equipment and the subsequent maintenance of equipment, training and monitoring are the general post delivery services carried out. Where Smurfit Westrock Recovered Fiber has plant and equipment at customer premises, suitable maintenance agreements will be set up.

When the maintenance is the responsibility of the company then competent staff will be supplied or contracted to carry out maintenance. The Company will also provide personnel for the customer to contact if a problem arises. Feedback is obtained from all such activities to help with maintenance schedules and preventive maintenance.

8.7   Control of nonconforming outputs, products and services

Instances of non-conformity will be reviewed with regards to action taken. In all cases the responsibility for review and authority for disposition is defined. If required by a contract or plan, the non-conformance shall be reported to the customer. Material sampling is defined within IMSP-13 Material sampling_1.pdf

The Compliance Manager, in conjunction with the relevant department heads, shall initiate investigations and appropriate corrective actions in the event of non-compliances with specified requirements.

9.0   Performance evaluation

9.1   Monitoring measurement, analysis and evaluation

Routine monitoring of the process, workplace, services and practices are carried out in accordance with documented instructions and will be carried out by the Management of the Company. All supervisors shall undertake spot checks of critical tasks to assure compliance with relevant quality, safety and environmental rules the Company has adopted.

Any item found to be unsafe should if possible be removed from use or prevented from inadvertent use. This should also prevent a hazard or risk to the process or personnel.

The periodic compliance review will be conducted of the legal and other requirements that affect the business activities. The review will be conducted by the Compliance Manager or third party on his behalf.

The frequency of periodic review may vary for differing legislation and requirements due to their nature, changes in practices or procedures, accidents/ incidents and changes to current legislation. The compliance Manager will maintain records of the review in which will contain details of any corrective actions where required.

9.1.2 Customer satisfaction

The company will establish to the extent necessary to ensure customer satisfaction processes for identifying the requirements of customers and potential customers. Consideration will therefore be given to the extent to which customer needs are formally specified.

The Company will define whenever possible the necessity to define details, obligations regarding the product or service, level of confidentially required and records required. Attempts will be made to obtain details regarding the stated and unstated needs of the customer to ensure customer satisfaction and satisfy them on availability of the product or service.

9.1.3 Evaluation of compliance

Routine monitoring of the process, workplace, services and practices are carried out in accordance with documented instructions and will be carried out by the Management of the Company. All supervisors shall undertake spot checks of critical tasks to assure compliance with relevant quality, safety and environmental rules the Company has adopted.

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The frequency of periodic review may vary for differing legislation and requirements due to their nature, changes in practices or procedures, accidents/ incidents and changes to current legislation. The compliance Manager will maintain records of the review in which will contain details of any corrective actions where required.

9.2 Internal audit

The internal audit process is documented within IMSP-07 Company audits_1.pdf. Auditors are identified and are authorised to conduct site audits to ascertain IMS compliance. Any evidence of nonconformances is raised and documented through Sharepoint where root cause is established and actions are issued to a responsible person. Actions are closed out when evidence of conformity has been provided as documented within IMSP-08 Nonconformances and preventative actions_1.pdf

9.3 Management review

Management review is defined within IMSP-01 Management review_1.pdf

10 Improvement

10.1 Improvement

It is the responsibility of the Compliance Manager to ensure that the necessary information is collected to allow management to carry out this evaluation. The Management review shall be documented and recorded; this may include but is not limited to:

- Outcomes of previous audits.
- Non-conformances raised.
- Progress of objectives, targets and their associated management programmes.
- Records of external or internal enquiries or complaints.
- Legal non-conformances.
- Staffing and other resources.

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- Opportunities for improvement

10.2   Nonconformity and corrective action

As part of the general improvement documentation detail is laid down as to preventive action. This will aid the detection, analysis and elimination of potential non-conformities within the IMS and all the areas it covers. Measure for the early warning of out-of-control aspects of the IMS are identified and implemented, this will include the review of records and results from the various forms of validation. The process of preventive action is defined and are disciplined in their process.

The aim is to eliminate the causes of potential non-conformities to prevent their occurrence. This will be achieved by means of risk analysis and suitability for conformity to the current system and safe working procedures. Any amendment or introduction of equipment, systems and procedures will undergo a form of review before final recommendation.

Any documents affected by the above will be identified including the IMS. Preventive action will be identified when required which in turn will be evaluated further to determine the effects on all areas of the IMS. If acceptable the remedies will be applied. Results shall be recorded at all stages and discussed at relevant Site meetings and Management Review meetings. The results from all four stages shall be recorded and as required revise the IMS documentation to reflect the actions taken. Preventive Action information will be discussed at relevant Site Management Meetings and the Management Review Meeting.
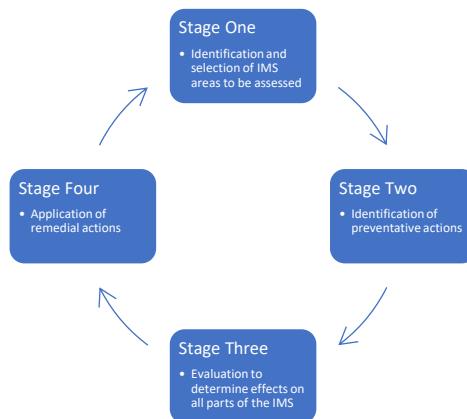
10.3   Continuous improvement

The company continually attempts to improve all areas of its business, including improvements to the IMS where applicable. Throughout the Company there is a comprehensive continual improvement philosophy, which is also addressed by the IMS. This process is known as Managing for Continuous Improvement (MFCI). Appropriate resource is allocated to this task; regular meetings and reports are undertaken on set achievements required under MFCI.

Annex:
IMS Flowchart_2025.pdf