

Aggregates and Recycling Limited

INTEGRATED BUSINESS MANAGEMENT MANUAL (IBMM)

Date: January 2017

1. INTRODUCTION

This Business Management Manual is a corporate manual, which describes the processes involved in ensuring provision and quality of the company's products and services, the safety and welfare of its employees and customers and the safeguard of the local environment.

The main holder of the ISO 14001 Environmental Management System certificate of approval is Johnsons Aggregates. ISOQAR granted the original approval in 2008. Since then the scope of the certification is to be expanded to cover ISO 9001 Quality Management and OSHAS 18001 (ISO 45001) Health and Safety Management.

Scope

The Company Policy details its commitment to the operation of an Integrated Business Management System (IBM System). The intended outcomes are:

- Enhance environmental, safety and quality performance
- Fulfil compliance obligations
- Achieve safety, environmental and quality objectives

The Company is also committed to supporting programmes and initiatives aimed at improving the awareness of sustainability with staff.

Continued certification to the international standard ISO9001, ISO14001 and OHSAS 18001 (soon to be ISO45001) will help achieve these intended outcomes and demonstrates that the IBMS is effective, providing value for the environment, the Company and interested parties.

The IBMS considers the safety and environmental aspects/impacts associated with its activities, products and services to determine the greatest risks and opportunities to the organisation. The risks and opportunities associated with the particular context in which the Company operates as well as the needs and expectations of stakeholders are also considered in line with the ISO Standards requirements.

This manual has been developed to help anyone navigate their way through the Company's IBMS and acts as a signposting document to indicate how each of the clauses in ISO Standards are addressed.

The Business Management System is applicable to:

Johnsons Aggregates

XXX.

HISTORY AND ORIGINS OF JOHNSONS AGGREGATES

Johnsons started trading in

THE SITES

The sites are located at

Current Site Plans

Normative References

References applicable to the implementation of the Company's IBM System are as follows:

	Title	Version
1	ISO14001 Environmental Management Systems	2015
2	ISO9001 Quality Management Systems –	2015
3	OHSAS 18001 Safety Management System	2007
4	SHEQ Policy	June 2017

Terms and Definitions

The following are common terms and definitions used with Business Management Systems and are applicable to activities at Johnsons and referred to in this Manual.

Organisation and Leadership

SHEQ Policy - Intentions and direction of an organisation related to safety, quality and environmental performance as formally expressed by its top management.

Top Management – Person or group of people who directs and controls an organsiation at the highest level. Top management has the power to delegate authority and provide resources within the organisation.

Interested Party – Person or organisation that can affect, be affected by, or perceive to be affected by a decision or activity.

<u>Planning</u>

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 – Change to the environment whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.

SHEQ Objective – Objective set by the organisation consistent with its SHEQ policy.

Requirement – Need or expectation that is stated, generally implied or obligatory.

Compliance Obligations – Legal requirements that an organisation has to comply with and other requirements that an organisation has to or chooses to comply with. **Risks and Opportunities** – Potential adverse effects (threats) and potential beneficial effects (opportunities).

Support or Operation

Competence – Ability to apply knowledge and skills to achieve intended results.

Documented Information- Information which is required to be controlled and maintained by an organisation and the medium on which it is controlled.

Life Cycle – Consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal.

Performance Evaluation and Improvement

Audit – Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria set by the organisation are fulfilled.

Nonconformity – Non-fulfillment of a requirement.

Corrective Action – Action to eliminate the cause of a nonconformity and to prevent recurrence.

Continual Improvement – Recurring activity to enhance performance.

Monitoring – Determining the status of a system, a process or an activity.

Performance – Measureable result.

Policy Statement



...your total waste partner

Health, Safety, Environmental and Quality Statement of Intent



Oakwood's Management Systems scope, accredited to ISO9001, ISO14001 and OHSAS 18001, relates to the provision of waste management services and Laboratory services. Collection, treatment and transfer of waste oils, other permitted waste streams and the manufacture and sale of fuel products

Oakwood Fuels, operating from a licensed waste management facility in Bilsthorpe, recognises that Health, Safety, Quality, and Environmental issues relevant to our office, processing areas and logistics operations, are a fundamental part of our business.

Our objective is to meet and where possible, exceed the requirements of all applicable legislation and Group policy. This will be achieved whilst addressing the needs of the business and maintaining our accredited Management Systems.

Wherever possible, Oakwood Fuels shall commit to the implementation of identified best practice through its Management Systems.

In particular we shall:

- 1. Continue to develop a positive Health and Safety, Quality, and Environmental culture across the organisation involving employees in the development and implementation process.
- 2.Ensure all employees and contractors take responsibility for working in a manner that promotes quality, minimises the risk of harm to the environment and promotes the Health & Safety of employees, contractors, visitors and members of the public.
- 3. Assess the level of risk from all significant health, security, safety and environmental hazards and so far as reasonably practicable, ensure that they are eliminated or adequately controlled.
- 4. Provide appropriate leadership, information, systems of communication, instruction, development training, retraining and supervision in health and safety to maintain and continuously improve the competence levels of all employees.
- 5. Monitor and minimise the health, safety and environmental impact of our operations where reasonably practicable.
- 6.Ensure full compliance with applicable legal requirements, Approved Codes of Practice and industry specific guidance and Protocols related to our Health and Safety, Quality, and Environmental processes and corporate business strategies; these will be regarded as minimum standards of achievement.
- 7. Allocate sufficient financial and physical resources to achieve our objectives.
- 8. Accurately assess customer requirements, ensure that the quality of service delivered consistently meets or exceeds expectations and respond effectively to any concerns about the level of service provided.
- Regularly monitor, audit and review our own, contractors' and suppliers' performance to ensure continual improvement.
- 10. Regularly review Company assets and security measures to minimise losses
- 11. Provide an independent OH advisory service targeting health screening and health surveillance for each employee where appropriate

The Managing Director and Management Team are responsible for Health and Safety and Environmental concerns at Oakwood Fuels. They are supported in this role by the Safety, Health, Environment, and Quality Manager who, as a management representative, is responsible for developing the Company's policies and procedures in line with current Health, Safety and Environmental legislation and for monitoring/auditing compliance with the systems.

This Policy Statement is reviewed at least annually, and is communicated to employees, contractors and suppliers; prominently displayed for visitors and will be made available to the public, stakeholders and any other interested party on request.

J. Mac Namara

(Managing Director)

S. Tooley

(Strategic Director)

M. Sneath

(General Manager)

G. Lowry

(Commercial Manager)

T. Lawlor

(National Sales Manager)

October 2016

General Requirements

Johnsons have developed written and formally issued process and procedures in order to comply with the requirements of ISO 9001, OSHAS 18001 (ISO 45001) and ISO 14001

Johnsons has:

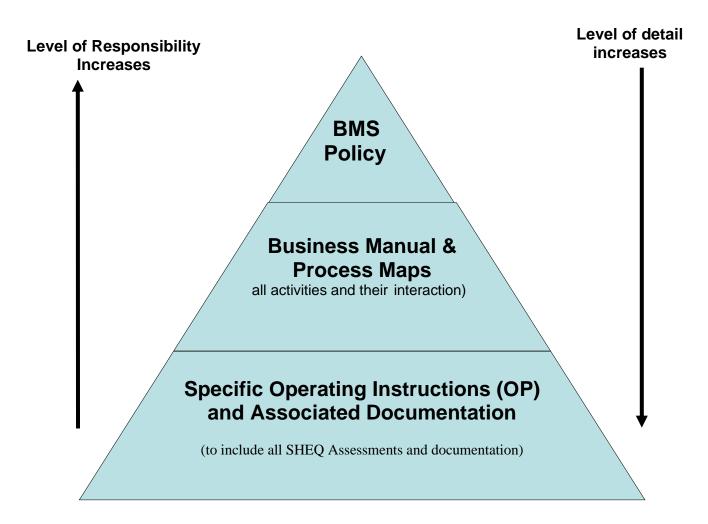
- a. identified the processes needed for the business management system and its application throughout the organisation;
- b. determined the sequence and interaction of these processes;
- determined the criteria and methods needed to ensure that both the operation and control of these processes are effective;
- d. made available the resources and information necessary to support the operation and monitoring of these processes;
- e. set up systems to monitor, measure and analyse these processes;
- f. taken and continue to take any actions necessary to achieve planned results and continual improvement of these processes.
- g. Consider all aspects of the business and determine and control their impact on the work, local and global environment

Johnsons will maintain such documentation systems to ensure that these processes are managed by Johnsons in accordance with the requirements of ISO 9001, OSHAS18001 (ISO 45001) and ISO 14001.

The business management system documentation has been developed, written, issued, installed and maintained, includes the following:

- a. a business policy statement and clear business management objectives statement, which are formally issued, signed and dated;
- b. a business management policy manual;
- c. operating procedures;
- d. any additional documents or forms needed by Johnsons to ensure the effective planning, operation and control of its processes; records required to demonstrate effective control or protect Johnsons or, any records required by ISO 9001, OSHAS 18001 (ISO 45001) and ISO14001 are established and maintained.

The system can be graphically represented as follows



Common Requirement	ORK	Process/ Procedure Reference	Owner
1. Scope		IBM Manual	
2. Normative References		IBM Manual	
3. Terms and Definitions		IBM Manual	SHEQ Manager
4. Context of the Organisation		IBM Manual	
5. Leadership		IBM Manual	
6. Planning		IBMP006	Senior Management
o. Flaming		IBMP007	Team
		IBMP005	
7. Support		IBMP010	
		IBMSHE021	
		IBMPOPs	
		IBMTOPs	
		IBMCOPs	
8. Operation		IBMSAPs	Entire Team
o. Operation		IBMAOPs	
		IBMMOPs	
		IBMP017	
		IBMP014	
		IBMP006	Senior Management Team
Performance Evaluation		IBMP013	
		IBMP016	
10 Improvement		IBMP014	Senior Management
10 Improvement		IBMP005	Team

Documentation Retention Periods

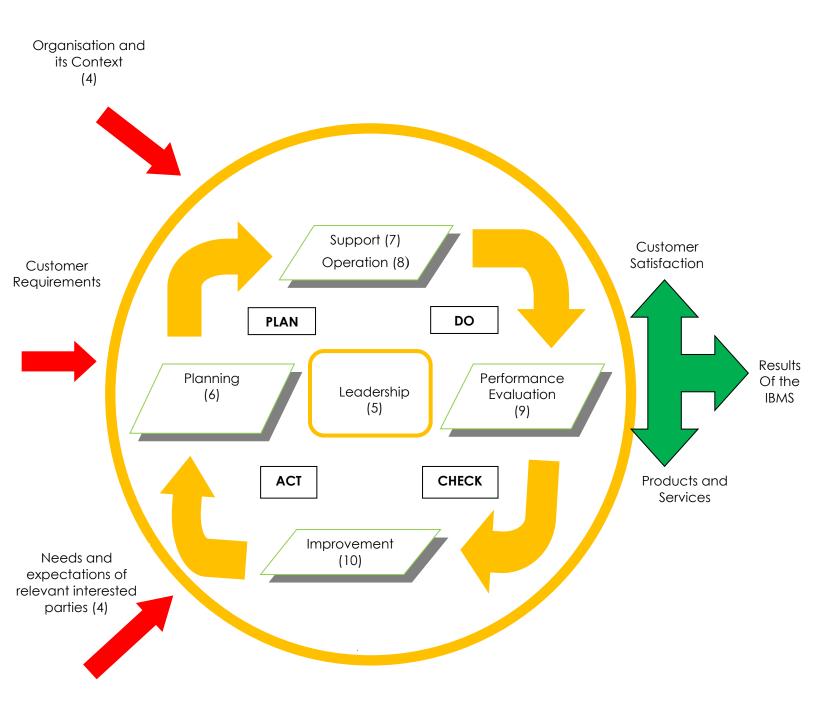
All documentation is maintained for reference purposes to demonstrate effective operation of the Company's Management System. Management System records are normally maintained for a minimum period of three to seven years unless Regulatory compliance dictates otherwise.

Records are also maintained for relevant information not included in the Company Management System, such as, pertinent contractor records. Each type of record is maintained in a suitable and secure manner that ensures that it can be retrieved when required.

All obsolete documents will still be retained but done so in Obsolete Folders on the Computer Servers. Records may also be disposed of at the end of the retention period in a secure manner, however in general records will be kept for the life of the site.

The following diagram shows an overview of the interaction of processes with regard to continual improvement and shows interface with customer requirements / satisfaction and how we use this information to improve our service.

Further reference is made throughout this manual to operational reference documents, these are used to further communicate how requirements for our system shall be met and show the continuing interaction of the system. These reference documents shall be available at the point of use, displayed next to a working area or included in other media including forms.



The Business Management System is comprised of this single manual that details the overall system of related processes that the company works with.

The processes rely on trained operatives and documented work procedures in order to detail the workings of the system.

Safety and environmental risks are also considered and their evaluation plays a significant part in ensuring legal compliance and the on-going safety and welfare of all our employees, visitors and contractors.

To this effect the following systems are used...

- Process and Procedure Flow diagrams used where a written procedure is not required
- Production safe work instructions and records of testing/monitoring for all site activities
- 3. Health and safety policy statements, risk assessments and training records for all site activities
- 4. Environmental procedures and assessments
- 5. Any other documentation as required to satisfy both the business needs and legal requirements

Legal Requirements

The Company will determine and consider which legislation is applicable to each work activity and put effective measures in place to maintain compliance. A register of legislation will be made available and kept up to date.

Risk Management

While planning for the IBM System, Johnsons has developed a mechanism to identify the risk and opportunity that need to be addressed to:-

- a) Assure the IBM system in place can achieve intended outcome
- b) Prevent, or reduce, undesired effects
- c) Achieve continual improvement
- d) Business Requirements

With respect to the IBM system, the Company has established and maintains procedures and documentation for identifying all health, safety and environmental risks, aspects, impacts of its activities which have the potential to affect any or all of the interested parties. This is achieved by carrying out risk assessments aspect & impact determinations and determining Business risk through contract review and Sales order process. Processes and procedures are defined and implemented across the division to ensure that the expectations of the IBM System are achieved.

In order to mitigate the consequences of any unplanned event, emergency or disaster, and to consider the effect on business continuity, the division has established and maintains an Emergency Preparedness procedure and associated documentation.

<u>Understanding the Needs and Expectations of Interested Parties</u>

With respect to the legal and other requirements applicable to all site activities, the Company has established and maintains procedures and documentation for identifying such requirements and perceptions and ensuring that they are taken into account during the maintenance of the IBM system.

Stakeholders who are considered when developing the IMS include but are not limited to:-

- a) **DCC PIc.** The impact of our activities is to maintain full legislator compliance, to protect the reputation of the company and to be profitable.
- b) **HSE** The requirement to be fully compliant with all relevant Safety legislation and ACOPS.
- c) **Environment Agency/SEPA** The requirement to be fully compliant with all relevant ENVIRONMENTAL legislation, ACOPS and licence conditions.
- d) **Customers** To be professional and ensure that their waste responsibilities are fully compliant with current legislation
- e) **General Public / Neighbours** To minimise all impacts arising from company activities.
- f) Employees To ensure all personnel are protected from the potential hazards, Communicated with when appropriate and to work within the current legislation to safeguard their employment.
- g) Dependants of Employees -
- h) **Competitors** Meeting the legal requirements to ensure fair competition
- i) **Government (Local & National)** Legal compliance, economic growth, Working in a manner to meet establish targets
- j) Insurers Rely on Johnsons to employ safe systems of work to minimise potential claims.
- k) **Emergency Services** All work carried out in a compliant manner to minimise the need for Emergency Services.

Life Cycle Analysis and Waste Minimisation Strategy

Legal requirements require Johnsons and customers to adopt strategies to where possible reduce the amount of material sent to Landfill.

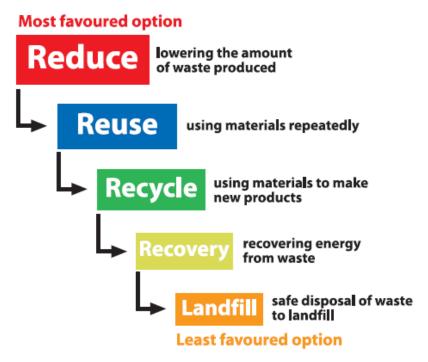
Every effort is made to re-use, reduce and recycle goods all along our supply change, as required under the Waste Hierarchy banner.

Obviously there are limits as to how much influence each party(i.e. customer and Johnsons can influence each other to reduce waste but every effort is made to improve the impact on the environment. Each customer can request accept to the recycling rates achieved by Johnsons.

Waste Hierarchy Model

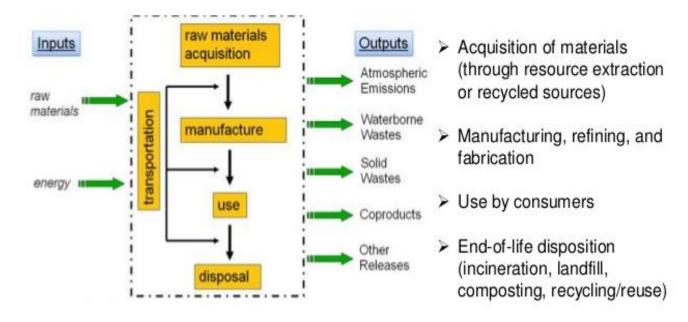
We stress to our customer the importance of waste reduction when we offer our waste services. Legal requirements also make it a requirement for the customer to disclose that they have considered the waste hierarchy when the sign over their waste streams over to us for processing.

Duty of Care audits are used by the Customer and Johnsons to check that all requirements when it comes to waste management services are adhered to.



Life Cycle Analysis Model

Our impact is based on aspect/impact assessments (**see IBMP002**) an well as balancing disposal outlet availability and commercial limitations.



Control of Documents

All documents applicable to the business will be generally kept electronic records. All documentation relating to the work activity will be found in the applicable production area/building. Customer related information will be made secure.

All stored electronic data will be backed up and copies taken to ensure that data is retrievable in the event of an IT malfunction.

Electronic records will be controlled such that any change in computer hardware or software is evaluated **before** its installation to ensure that all stored and back up data is retrievable.

Documents will be controlled as shown in the Process Procedure IBMP005.

Control of Records

Records are established and maintained to provide evidence of conformity to requirements and of the effective operation of the business management system. Controls exist to ensure records remain legible, readily identifiable and retrievable. A documented procedure has been established to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records.

MANAGEMENT RESPONSIBILITY

Management Commitment

The Managing Director in addition to his normal responsibilities as a senior Executive of the company is ultimately the nominated management representative with responsibility for establishing, implementing and maintaining the Business System and reporting its effectiveness. He has full authority to ensure that the system is understood and established throughout the organisation.

All members Company Management Team also have responsibility for ensuring that within their individual areas of responsibility the SHEQ Policy is implemented.

They are also responsible for ensuring that any identified risks to the business are eliminated or reduced at source to as low as reasonably practicable and that the Company's strategic development does not compromise the intended outcomes of the IBM System.

Specifically members of the Management Team have responsibility for ensuring that staff under their line management work within the requirements of the Company's SHEQ management procedures. This ensures that the Company meets its legal and other compliance obligations and ensures continual improvement.

The Management Team are responsible for:

- Ensuring staff are provided with, and kept up-to-date with training
- Ensure that the Policy is embedded into the day to day actions of staff and that any new projects meet the Policy commitments;
- Enforce the use of relevant IBMS documentation; adhering to SHEQ management operating procedures and record keeping relevant to their job roles;
- Comply with the procedure for reporting Incidents/ Near Misses/ Non Conformities;
- Take reasonable care for the environment and co-operate with supervisory or senior staff to enable them to follow Company's management procedures;
- Provide resources and the support necessary for identified staff to carry out their specific management responsibilities as identified in this document.
- communicating to all of staff, the importance of meeting customer requirements, whilst also meeting statutory and regulatory requirements;
- ensuring that business objectives are established;
- conducting management reviews;
- ensuring the availability of resources.

The overall management structure is shown in Appendix "A". The chart simply shows functional relationships and responsibilities. It does not imply relative seniority or importance of position.

Roles and responsibilities of all employees can be found in their contracts of employment. All changes to terms and conditions are controlled by the Human Resources Department.

Members of staff will be allocated responsibilities based on their job function and training and education background.

Focusing on Customer Requirements

Top management continually ensures that customer requirements are determined, fully understood and are met with the aim of enhancing customer satisfaction.

Business Management Policy

The Business Management (SHEQ) Policy can be found in at the start of this manual.

A copy of the latest issue of this Business Management Policy is displayed in the Reception area and in other appropriate buildings.

<u>Planning</u>

Business Objectives

(A) CORPORATE BUSINESS OBJECTIVES

The objectives of the Business Management System are:

- a) To maintain an effective Business Management System complying with International Standard ISO9001 (Quality Systems), ISO 14001 (Environmental System) and OHSAS 18001 (ISO45001) (H&S Systems)
- b) To achieve and maintain a level of quality which enhances the Company's reputation with customers.
- c) To ensure compliance with relevant statutory, safety and environmental requirements.
- d) To endeavour, at all times, to maximize customer satisfaction with the services provided by each individual organisation

(B) SPECIFIC OBJECTIVES AND TARGETS

- The company will set specific targets and objectives regarding Safety,
 Quality and the Environment.
- These targets and objectives will not be documented as part of the Business Management System Manual but will be discussed at Management Review Meetings.

Business Management System Planning

Top management have ensured that...

- a. planning of the business management system is carried out in order to meet the general specific requirements of ISO 9001, ISO 14001 and OHSAS 18001 (ISO 45001) including the need for continuous improvement and establishing and meeting business objectives;
- b. the integrity of the business management system is maintained when changes to the management system are planned and implemented.
- Specific customer requirements are identified and documented during the contract review process, allowing these requirements to be communicated and achieved, ensuring satisfaction of all customers declared needs.

Communication

Top management will communicate with all interested parties, both internal and external, by the most appropriate means.

The Management Team is responsible for coordinating and delivering a variety of different communications and events in order to ensure that the Company's main stakeholders can engage with the IBMS.

The Company uses its **Intranet** service (Sharepoint) to make IBMS related documentation and information available to staff. IT and the SHEQ Manager have granted permissions to the site and are responsible for keeping relevant content up-to-date. Staff are encourage to use the site to locate information and access documents. Also used are:

Newsletter – The Company publishes a safety, logistics and HR Newsletters, on a regular basis. '

Television Screens – Company information can be displayed on all PC screen savers (if networked) and plasma screens throughout site.

E-mail – The Company uses email to internal communications.

Internet - The Company uses the Intranet to communicate its product and service offering to current and potential customers. A Customer Portal is also available for specific information downloads.

Enquiries - General enquiries are received and managed in a number of ways notably email or telephone communication

Social Media – the Company has Twitter, Facebook and LinkedIn accounts

Management Review

Top management formally reviews Johnsons Business Management System, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. This review is formally recorded and includes assessing opportunities for improvement and the need for changes to the business management system, including the business management policy and objectives.

Provision of Resources

Johnsons have determined, planned and provided the resources needed to implement and maintain the business management system, to continually improve its effectiveness, and to enhance customer satisfaction by meeting customer's requirements and expectations.

Human Resources

Johnsons has procedures to ensure that personnel performing work affecting product or service are competent on the basis of appropriate education, training, skills and experience.

Competence - Awareness and Training

Johnsons will...

- (a) determine the necessary competence for personnel performing work affecting product or service quality;
- (b) provide training or other appropriate actions to satisfy these needs;
- (c) review and evaluate the effectiveness of the actions taken:
- (d) ensure that its personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the business objectives;
- (e) maintain appropriate records of education, training, skills and experience.

Infrastructure

Johnsons plans, provides and maintains the infrastructure needed to achieve conformity to product or service requirements. Including, where applicable

- (a) buildings, workspace and associated utilities;
- (b) process equipment (both hardware and software);
- (c) supporting services (such as transport or communication).

Work Environment

Johnsons continually reviews and manages the work environment needed to achieve conformity to product or service requirements.

Johnsons will define and manage those human and physical factors of the work environment needed to achieve conformity of product.

PLANNING TO REALISE THE PRODUCT AND/OR SERVICE

Planning and maintenance of processes directly relating to the product and/or service.

Johnsons have developed and implemented procedures and provide the necessary resources, for all processes to ensure successful realisation of the product or services to conform to specific requirements. Business objectives to improve the product will be programmed where appropriate.

Johnsons however do not undertake design work and are therefore exempt from the Design clauses of ISO9001.

Customer Related Process

Determination of requirements related to the product or service

- (a) Johnsons will determine customer requirements, preferably as a clear specification, including any requirements for delivery and post-delivery activities;
- (b) Johnsons will also consider requirements not stated by the customer but thought may be necessary for specified or intended use (where the intended use is in fact known)
- (c) Johnsons will determine statutory and regulatory requirements related to the product or service;
- (d) Johnsons will determine any additional requirements that may enhance the product or service

If consideration of b, c, or d, above appears to conflict with 'a' (e.g. the customer's specification) the customer is advised formally, to confirm if they wish to amend their specification. Such advice and any subsequent amendments to specification or order requirements are formally reviewed and recorded.

Review of requirements and the contract related to the product or service

Johnsons will review the requirements related to the product or service. This review will be conducted prior to Johnsons commitment to supply a product or service to the customer (e.g. at submission of tenders, at acceptance of contracts or orders, at acceptance of changes to contracts or orders) and will ensure that

- a. product or service requirements are adequately defined:
- b. any differences or inconsistency in contract or order requirements from those in the tender, offer or from those previously expressed are resolved, and;
- c. Johnsons has the ability to meet the defined requirements.

Records of the results of the contract review and actions arising from the review are maintained.

Where the customer provides no documented statement of requirement, the customer requirements will be confirmed and documented internally by Johnsons before acceptance.

Where product or service requirements are changed, Johnsons will ensure that relevant documents are amended and also that relevant personnel are made aware of the changed requirements.

The customer may order an 'off-the-shelf' or catalogue item. In these cases, the review will be a check to ensure that, there are no additional, unusual or additional requirements.

Customer Communication

Johnsons has determined and implemented effective arrangements for communicating with customers in relation to

- a. product or service information;
- b. enquiries, contracts or order handling, including amendments, and;
- c. customer feedback, including customer complaints.

Control of Changes

Design and development changes will be identified and records maintained. The changes will be reviewed, verified and validated, as appropriate, and approved before implementation.

The review of design and development changes will also include an evaluation of the effect of the changes on product or service already delivered and/ or any constituent parts or spares that may be held in stock, or work in progress.

Records of the results of the review of changes and any necessary actions will be maintained.

Purchasing Process

Johnsons will ensure that purchased items, material or service conforms to specified purchase requirements. The type and extent of control applied to the supplier and the purchased items, material or service will be dependent upon the effect of the purchased items, material or service on subsequent final product provided to the customer.

Johnsons have and will evaluate and select suppliers based on their ability to supply product or service in accordance with Johnsons requirements.

Criteria for selection, evaluation and re-evaluation have been established.

Records of the results of evaluations and any necessary actions arising from the evaluation are maintained.

Information Required for Purchasing

Purchasing information will clearly and uniquely describe the product or service to be purchased, including if appropriate

- 1. any additional requirements for 'approvals' or in-process or final inspection of product or service, procedures, Processes and equipment prior to delivery;
- 2. any additional requirements for qualification of personnel;
- 3. any essential or additional business management system requirements.

Johnsons will formally review the specified purchase requirements to ensure the adequacy, prior to their communication to the supplier.

Verification of Purchased Product or Service

Johnsons have established and implemented inspection, checks or other activities necessary to ensuring that purchased product or service meets specified Purchase requirements.

Where Johnsons or our customer intends to perform inspection or verification at the supplier's premises, or at source Johnsons will state the intended inspection or verification arrangements and method of product or service release in the purchasing information.

Provision for Production and/or the Service Required

Control of Production and Service Provision

Johnsons have and will continue to plan and carry out production and service provision under controlled conditions. Controlled conditions will include, as applicable

- 1. information available that describes the characteristics of the product or service required;
- 2. where necessary, suitable operating procedures or work instructions available where the operation actually takes place;
- 3. provision and use of suitable equipment;
- 4. provision of monitoring and measuring devices and instructions when to use and the specified tolerances or process control data;
- 5. appropriate monitoring and measurement;
- 6. suitable release, delivery and post-delivery activities.

Validation of Special Production and Service Processes

Johnsons will validate any processes for production and service provision that are special in the sense that the resulting output cannot be verified easily or inspected by subsequent monitoring or measurement.

This includes any processes where deficiencies become apparent only after the product is in use or the service has been delivered.

Validation will demonstrate the ability of these processes to achieve the planned results.

Johnsons have established arrangements for these processes including, as applicable

- (a) defined criteria for review and approval of the processes;
- (b) approval of capable equipment and qualification of personnel;
- (c) use of specific methods, procedures, instructions or in-process checks or inspections;
- appropriate records will be kept of the development and approval of the validation processes; also appropriate records will be kept of the readings or inspection results arising;
- (e) if appropriate the processes will be subject to revalidation.

Identification and Traceability

Where appropriate, Johnsons will identify the product or service provided by suitable means throughout product or service realisation.

As necessary, Johnsons will identify the status of the product or service with respect to its monitoring and measurement requirements, or if it is awaiting inspection and approval, quarantined, rejected, etc.

Where traceability is a requirement of the contract, Johnsons will capture (or create), control and record the unique identification of the product or service and provide the necessary traceability to raw material, suppliers, process, equipment, personnel, project files etc.

Preservation of Product

Johnsons will preserve the conformity of product (and constituent parts) during internal processing and delivery to the intended destination.

This preservation will include appropriate identification, handling, packaging, storage and protection.

Control of Monitoring and Measuring Devices, including Calibration

Johnsons will determine the monitoring and measurement to be undertaken and appropriate devices needed to provide evidence of conformity of product or service to specified requirements.

Johnsons will establish processes to ensure that appropriate monitoring and measurement can be carried out to meet the necessary requirements.

To ensure valid results, where appropriate measuring equipment will

- (a) be calibrated or verified at specified intervals, or prior to use, against measurement standards traceable to international or national measurement standards; where no such standards exist, the basis used for calibration or verification will be recorded:
- (b) be adjusted or re-adjusted as necessary;
- (c) be identified to enable the calibration status to be determined:
- (d) be safeguarded from adjustments that would invalidate the measurement result:
- (e) be protected from damage and deterioration during handling, maintenance/storage.

In addition, when a piece of equipment is found not to conform to Johnsons will assess and record the validity of the previous measuring results taken on that equipment. If appropriate Johnsons will take action on the equipment.

If appropriate, Johnsons will take action on any previously supplied product or service that has been affected.

Records of the results of calibration and verification will be maintained

Any computer software used in the monitoring requirements will be checked and validated reconfirmed at appropriate intervals.

MEASUREMENT ANALYSIS AND IMPROVEMENT

Johnsons will plan and implement the monitoring, measurement, analysis and improvement processes needed to:

- (a) demonstrate conformity of the product or service;
- (b) ensure compliance of the business management system, and;
- (c) continually improve the effectiveness of the business management system.

This will include determination of applicable methods, including statistical techniques where applicable, and the extent of their use.

Customer Satisfaction

Johnsons monitor information relating to customer Perception as to whether Johnsons are meeting customer requirements.

Face-to-face customer visits will be undertaken by the Business Managers. There will also be regular email and telephone contact. Customer Satisfaction surveys will also be undertaken.

Complaints received will also be used as a measure of satisfaction, especially during their close out.

Internal Audits

Johnsons has implemented documented procedures to carry out internal audits at planned intervals to determine whether the business management system conforms:

- (a) to the planned arrangements;
- (b) to the requirements of ISO 9001, OSHAS 18001 (ISO 45001) and ISO 14001 and other requirements as applicable
- (c) to the business management system requirements established by Johnsons is effectively implemented and maintained.

An audit programme is scheduled, taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits.

The audit criteria, scope, frequency and methods will be defined. Selection of auditors and conduct of audits will ensure objectivity and impartiality of the audit Process.

Auditors will not, wherever possible, audit their own work.

The responsibilities and requirements for planning and conducting audits, and for reporting results and maintaining records is defined in the documented procedure.

The management responsible for the area being audited will ensure that actions are taken without undue delay to eliminate any non-conformity found and the causes. Follow-up activities will include the verification of the actions taken with appropriate recording and reporting.

Monitoring and Measurement of Processes

Johnsons will apply suitable methods for monitoring and, where applicable, measurement of the business management system processes. These methods demonstrate the ability of the processes to achieve planned results. When planned results are not achieved, corrective action is taken, as appropriate, to ensure conformity of the product or service.

Monitoring and Measurement of Product or Service

Johnsons will monitor and measure the characteristics of the product or service to verify that requirements have been met. This is carried out at appropriate stages of the product or service realisation process in accordance with the documented procedures and planned arrangements.

Evidence of conformity with the acceptance criteria are maintained. Records will indicate the person(s) authorising release of product or service.

Only in exceptional circumstances, will product be released and service be delivered before the planned arrangements have been satisfactorily completed. This will always require formal approval, if necessary by the customer.

Control of Non-Conforming Product or Service

Johnsons will ensure that product or services that do not conform to requirements are identified and controlled to prevent unintended use or delivery. The controls and related responsibilities and authorities for dealing with non-conforming product or service are controlled by the documented procedures.

Johnsons will deal with non-conforming product or service by one or more of the ways

- (a) by taking action to eliminate the detected non-conformity and its cause;
- (b) by authorising its re-work to make it conform to specification;
- (c) release or acceptance 'as it is' or without additional work under concession by a relevant authority and, where applicable, by customer;
- (d) by repair, or additional processes, which will make it usable but not exactly to specification. This will require release or acceptance under concession by a relevant authority and, where applicable, by the customer;
- e) by taking action to preclude its original intended use or application e.g. scrap, regrade, use as raw material for another process, etc.

Records of the nature of non-conformities and any subsequent actions taken, including concessions approved and rejected are maintained.

When non-conforming product or service is corrected, it will be subject to reverification to demonstrate conformity to the requirements.

When non-conforming product or service is detected after delivery or use has started, Johnsons will take action appropriate to the effects, or potential effects, of the non-conformity.

Johnsons will determine, collect and analyse data to determine the suitability and effectiveness of the business management system and to evaluate where continual improvement of the effectiveness of the business management system can be made.

This will include data generated as a result of monitoring and measurement and from other relevant sources.

The analysis of data will provide information including

- (a) customer satisfaction;
- (b) conformity to product or service requirements;
- characteristics and trends of processes, products or services including opportunities for improvement and preventive action;
- (d) Johnsons suppliers.

<u>Improvement</u>

Continual Improvement

Johnsons will methodically strive to continually improve the effectiveness of the business management system through the use of the business management policy, objectives, audit results, analysis of data, corrective and preventive actions and management review.

Corrective Action

Johnsons will take action to eliminate the cause of non-conformities in order to prevent recurrence.

Corrective actions will be appropriate to the effects of the non-conformities encountered.

A documented procedure has been established to define requirements for

- (a) reviewing non-conformities (including customer complaints);
- (b) determining the causes of non-conformities;
- (c) evaluating the need for action to ensure that non-conformities do not recur;
- (d) determining and implementing action needed;
- (e) records of the results of action taken, and;
- (f) reviewing corrective action taken.

Preventative Action

Johnsons has documented procedures to try and ensure appropriate actions are taken to eliminate the causes of potential non-conformities in order to prevent occurrence in the first place.

A documented procedure has been established to define requirements for

- (a) determining potential non-conformities and their causes;
- (b) evaluating the need for action to prevent occurrence of non-conformities;
- (c) determining and implementing action needed;
- (d) records of results of action taken;
- (e) reviewing preventive action taken.

Emergency Preparedness & Response

In line with Control of Major Accident Hazards (COMAH) Regulations (although not applicable to our business), Johnsons has in place has in placed both internal and external incident plans.

These plans are made available to various bodies and undergo both internal and external testing and review.

Plans and procedures also exits for security measures