



Integrated Management System Policy Manual

AO Recycling Limited

06 October 2023

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Contents

| | |
|--|----|
| Version Control..... | 3 |
| Purpose – IMS Manual | 4 |
| Context of the Organisation..... | 5 |
| Company Overview | 5 |
| Site Diagrams and Locations | 6 |
| Company process overview diagram..... | 8 |
| Organisational Context | 9 |
| Interested Parties..... | 10 |
| The Scope of the IMS | 11 |
| IMS Structure..... | 12 |
| Leadership and Worker Participation..... | 13 |
| Leadership & Commitment..... | 13 |
| AO Recycling Quality Policy | 15 |
| AO Recycling Environmental Policy | 16 |
| AO Recycling Health & Safety Policy | 17 |
| Organisational roles, responsibilities and authorities | 19 |
| Consultation and Participation of Workers | 23 |
| Planning..... | 24 |
| Actions taken to address risks and opportunities..... | 24 |
| Occupational Health & Safety – Hazards | 24 |
| Environmental Aspects and Impacts..... | 25 |
| Legal & Other Requirements | 25 |
| Objectives & Planning | 26 |
| Support | 27 |
| Resources | 27 |
| People | 27 |
| Infrastructure | 27 |
| Environment for the Operation of Processes | 27 |
| Monitoring and Measuring Resources | 28 |
| Organisational knowledge..... | 28 |
| Competence | 29 |
| Awareness | 30 |
| Communications..... | 31 |
| Documented information | 32 |

| | |
|--|----|
| Creating and updating | 32 |
| Control of documented information | 32 |
| Operations | 33 |
| Operational Planning & Control..... | 33 |
| Management of change | 34 |
| Procurement..... | 34 |
| Emergency preparedness and response..... | 35 |
| Requirements for products and services..... | 36 |
| Customer Communication..... | 36 |
| Determining the Requirements Related to Products and Services..... | 36 |
| Review of requirements related to products and services | 36 |
| Changes to requirements for products and services | 37 |
| Design & Development of Products and Services..... | 38 |
| Control of externally provided processes, products and services..... | 39 |
| Production and service provision..... | 40 |
| Control of production and service provision | 40 |
| Identification and traceability | 40 |
| Property belonging to customers or external providers | 40 |
| Preservation | 41 |
| Post-delivery activities | 41 |
| Control of changes | 41 |
| Release of products and service | 42 |
| Control of nonconforming outputs | 43 |
| Performance Evaluation | 44 |
| Monitoring, measurement, analysis, and performance evaluation..... | 44 |
| Customer Satisfaction | 44 |
| Evaluation of compliance | 44 |
| Internal Audits | 45 |
| Management Review..... | 46 |
| Improvement | 47 |
| Incident, nonconformity, and corrective action | 47 |
| Continual improvement | 48 |
| Appendix 1 – Index..... | 49 |

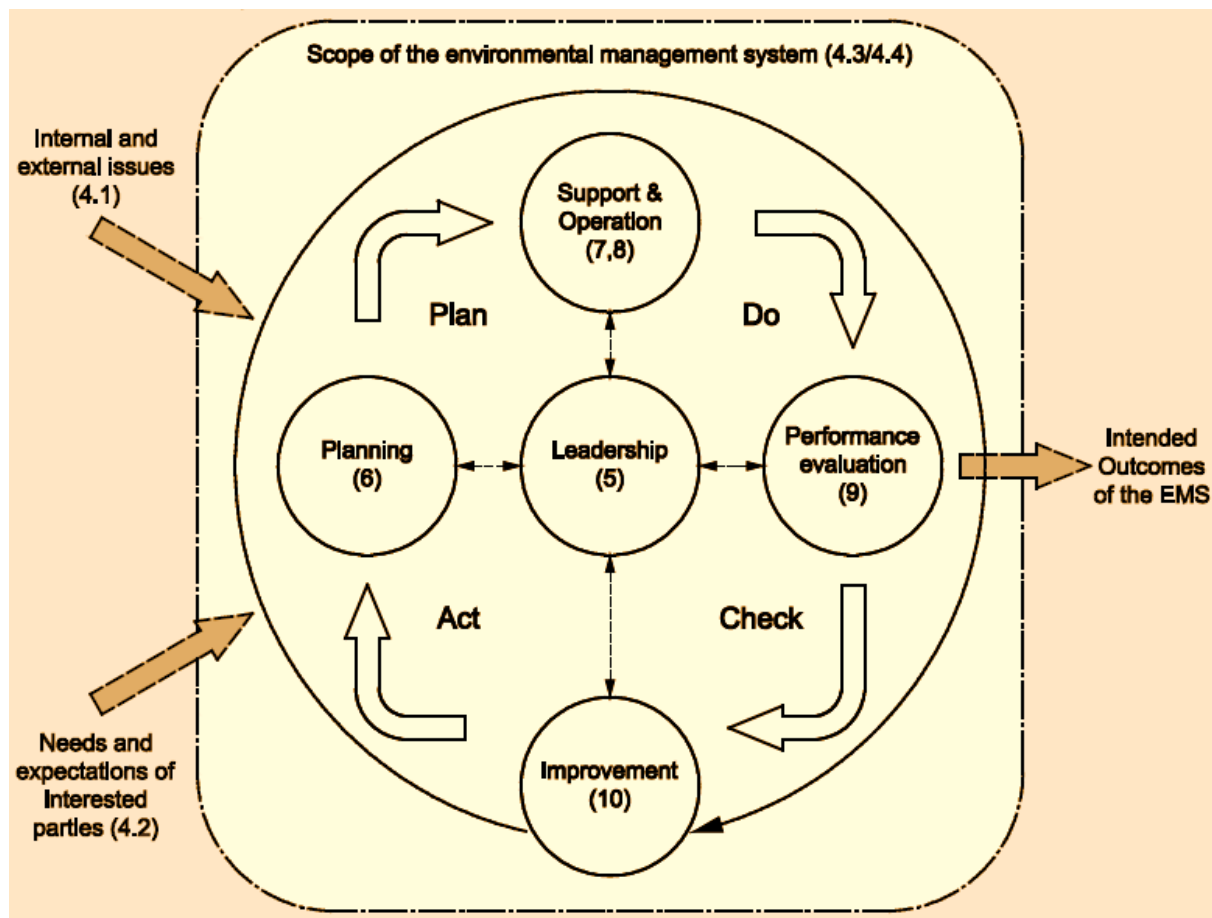
Version Control

| Date | Version No | Page No. | Description of Change | Authorised by: |
|-------------------------|------------|----------|--|----------------|
| 01.04.11 | 1.1 | All | First Copy | ACS |
| 11.08.11 | 2.1 | All | Incorporating ISO 45001 | ACS |
| 09.09.12 | 3.1 | | Incorporating Re-use | ACS |
| 10.12.14 | 4.1 | All | Updating | ACS |
| 06.06.16 | 5.1 | All | Update | ACS |
| 15.09.17 | 6.1 | All | Update | ACS |
| 16.03.18 | 7.1 | All | General Update | ACS |
| 25.06.18 | 7.2 | 15 | Update Non-conformance reporting | ACS |
| 01.02.19 | 8.1 | All | Update | ACS |
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| 28.05.19 | 8.3 | 12 | Review of ISO 45001 requirements | ACS |
| 03.01.20 | 9.1 | All | Update to incorporate Stafford Park Site | ACS |
| 04.07.20 | 10.1 | All | Update | GD |
| 10.09.21 | 11.1 | All | Update for new structure IMS | GD |
| 01.02.22 | 11.2 | Append. | Added appendices | GD |
| 06.10.23 | 12.1 | All | Update | GD |
| Next Review: 30/09/2026 | | | | |

Purpose – IMS Manual

The purpose of AO Recycling Integrated Management System (IMS) Manual is to provide interested parties with a context of the organisation's ability to achieve outcomes of BS EN ISO 9001:2015 Quality Management Systems, BS EN ISO 14001:2015 Environmental Management Systems and BS ISO 45001:2018 Occupational Health and Safety Management Systems.

This manual clearly defines a systematic approach used by the organisation to identify and manage internal & external concerns that are relevant to its purpose, its strategic direction and aspect that may affect its ability to achieve intended outcomes. AO Recycling applies the Plan, Do, Check, Act (PDCA) cycle to assist it meet the requirements of all three standards and to achieve all intended outcomes.



Source: ISO 14001:2015 Environmental Management Systems

Context of the Organisation

Company Overview

AO Recycling Ltd is the recycling arm of a large online electrical appliance retailer. The company is based in Telford, Shropshire and holds an environmental permit for each site.

The organisations main activities involve the recycling of Waste Electric and Electronic Equipment (WEEE) such as refrigerators, cookers, dishwashers etc. This is set out in the WEEE directive 2012/19/EU and transposed into UK legislation – Waste Electrical and Electronic Equipment Regulations 2013.

Committed to continual improvement, AO Recycling has recently commissioned and opened a plastics recycling facility to further enhance value to its Interested Parties.

AO Recycling brings together AO with the former owners and managers of The Recycling Group (TRG). This Shropshire based business has more than a decade long track record in WEEE recycling. Having traded since 2009. AO Recycling is currently employing more than 300 people, covering three sites.

AO Recycling runs its own in-house transport which means that very bespoke and tailored WEEE collection and disposal service can be offered to customers.

The main processes are:

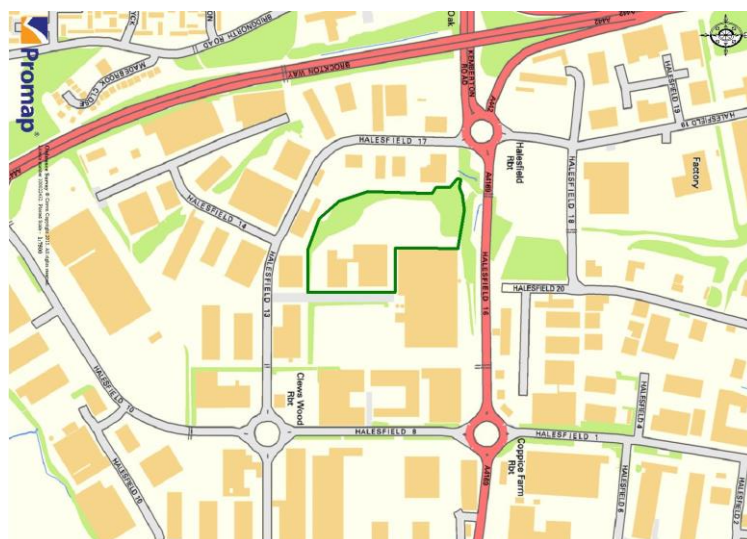
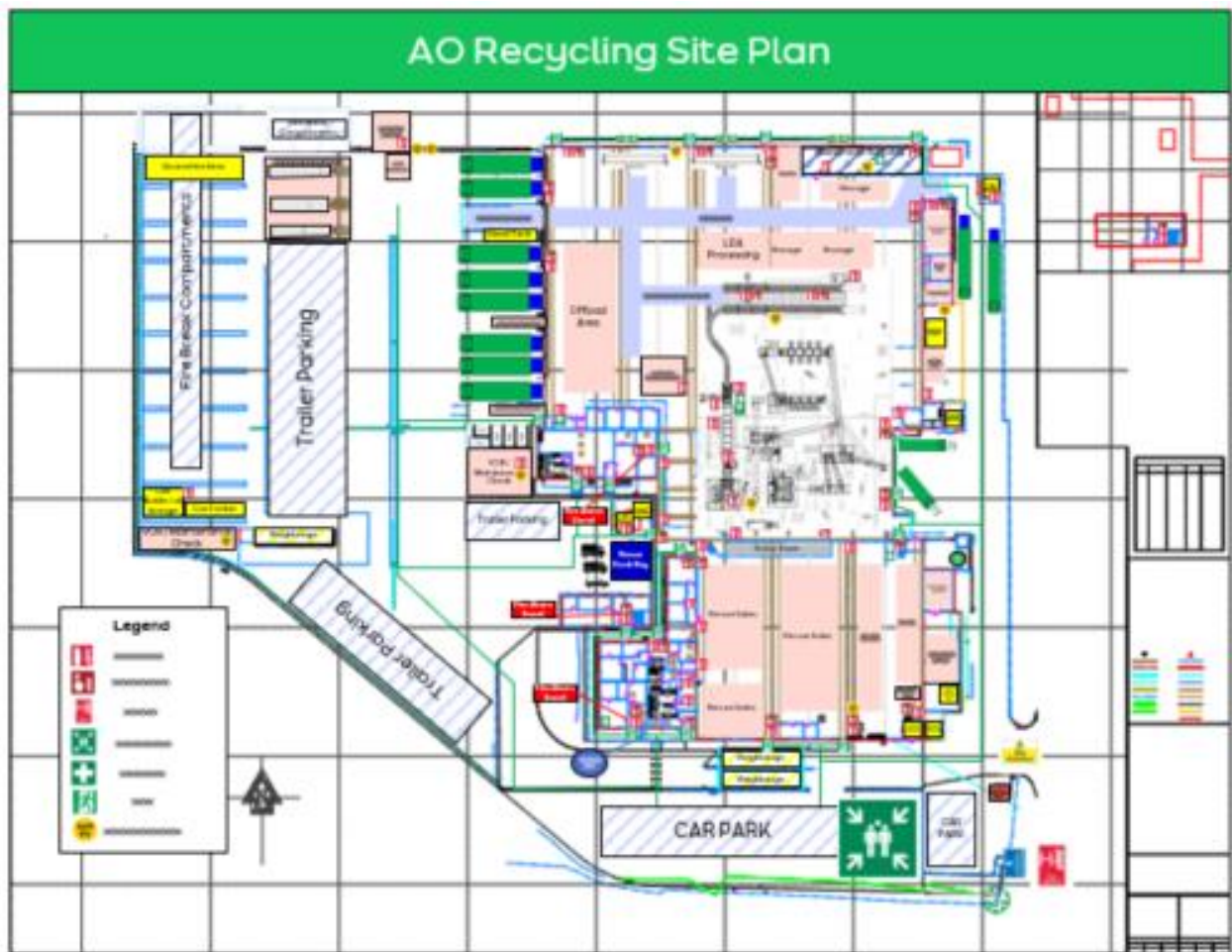
- Collection of waste.
- Acceptance of waste to the permitted site.
- Sorting of waste.
- Pre-destruction processing of waste.
- Destruction.
- Dispatch of clean, recycled materials for re-use.

The processes above are all regulated by the Environment Agency under the Environmental Protection Act 1990.

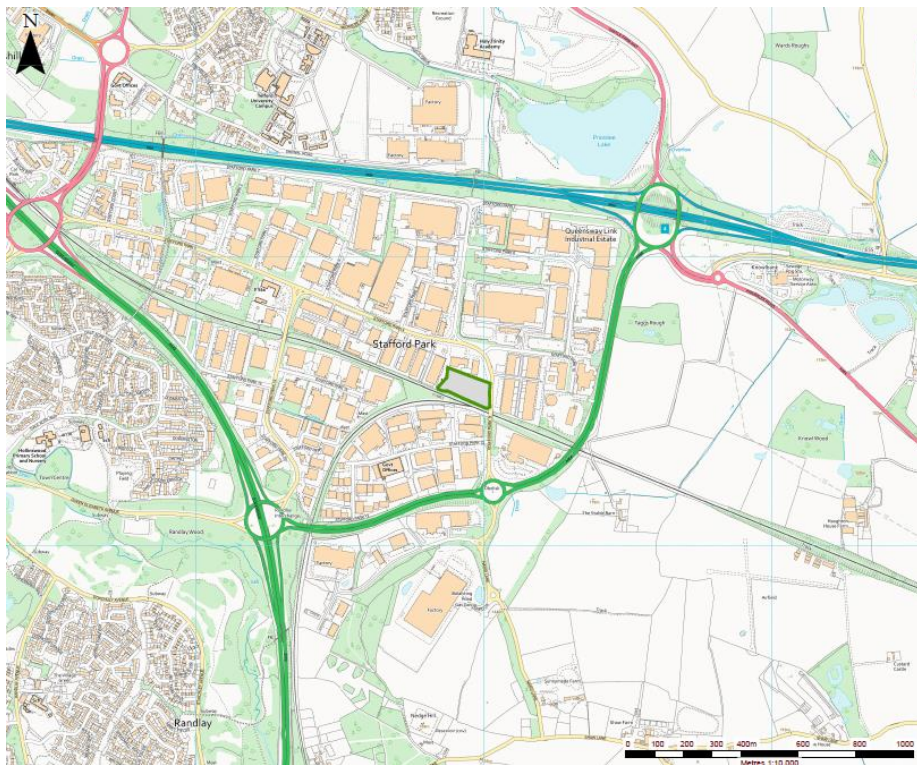
The application of all aspects of the organisation's Integrated Management System (IMS) is rigorously assessed both internally and by external parties to ensure compliance with BS EN ISO 9001:2015 Quality Management Systems, BS EN ISO 14001:2015 Environmental Management Systems and BS ISO 45001:2018 Occupational Health and Safety Management Systems, legal and other requirements.

Site Diagrams and Locations

Halesfield

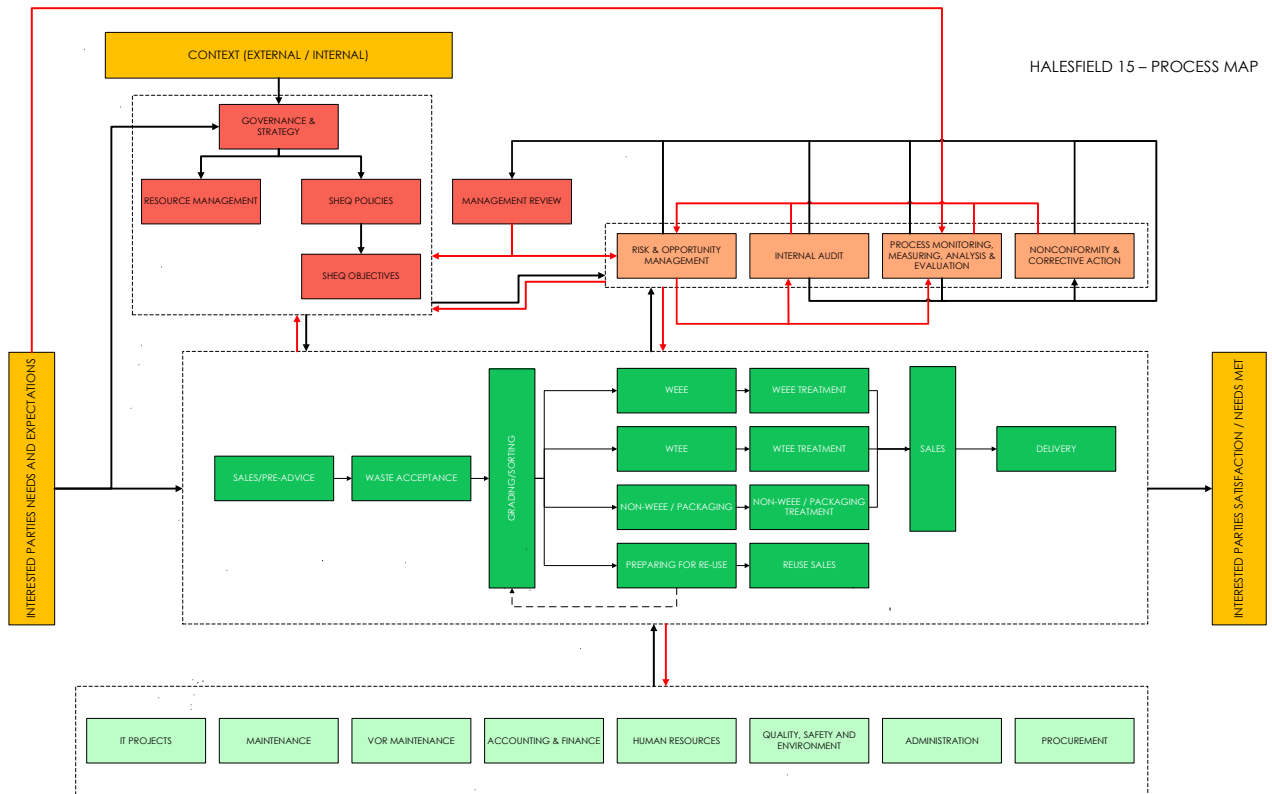


Stafford Park

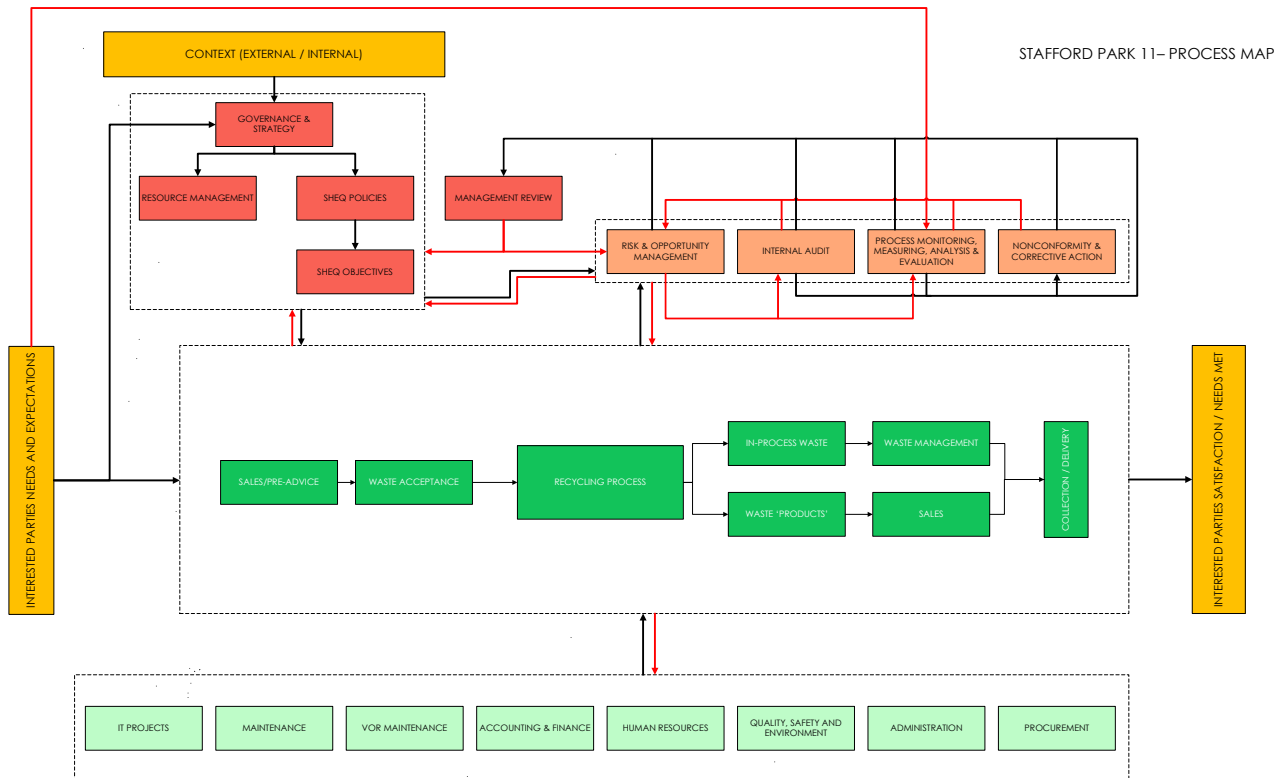


Company process overview diagram

Halesfield



Stafford Park



Organisational Context

The organisation determines the external and internal issues that are relevant to its purpose and strategic direction and that affect its ability to achieve the intended results of the IMS.

AO Recycling reviews external and internal issues relevant to its Organisation periodically to ensure that it remains relevant to its activities and that any new or emerging Strengths, Weaknesses, Opportunities or Threats are identified with appropriate actions and responsibilities assigned.

Consideration is given to the:

- Positive or negative factors or conditions.
- External context and issues, such as legal, regulatory, technological, competitive, cultural, social, political, and economic environments.
- Internal context and issues, such as values, culture, organisation structure, knowledge, and performance of the business.
- Determination and requirements of the needs and expectations of interested parties relevant to the IMS.
- Authority and ability to exercise control and influence.
- Activities, products, and services relevant to the business.

Documented information is retained as evidence to support that the context of the organisation has been considered in the IMS. AO Recycling's monitors and reviews actions and assigned responsibilities for all S.W.O.T via the organisation's risk register.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 4.1 | 4.1 | 4.1 |

Interested Parties

AO Recycling periodically identifies, reviews, and monitors the needs and expectations of all interested parties. As defined in the standards, interested parties are any 'person or organisation that can affect, be affected by or perceive itself to be affected by a decision or activity'.

AO Recycling identifies the needs and expectations of the following parties and, via various aspects of its IMS achieves intended outcomes:

- Legal and Regulatory authorities.
- Customers.
- Internal Stakeholders (AO World Plc, AO Recycling Board, AO Recycling Employees, Shareholders).
- Suppliers & Distributors, Contractors and Subcontractors.
- Professional Bodies.
- Trade Associations.
- Assessment bodies.
- Local Community.
- General public.
- Media.

The organisation manages the needs and expectations of interested parties throughout all stages of its activities, by developing and maintaining open and collaborative relationships with all stakeholders.

AO Recycling maintains an interested parties register to ensure that control measures for ensuring the needs and expectation of all interested parties have been considered and are implemented.

A review of all interested parties and identified control measures is conducted as part of the Management Review Process.

References:

| ISO 9001 | ISO 14001 | ISO 45001 |
|----------|-----------|-----------|
| 4.2 | 4.2 | 4.2 |

The Scope of the IMS

The scope of the IMS applies to the Recycling and Re-use of Waste Electronic and Electrical Equipment; recycling of plastic waste and confined to the boundary of the United Kingdom.

| | |
|--------------------------------------|--|
| Halesfield 15, Telford TF7 4ER | Stafford Park 11 Telford TF3 3AY |
|--------------------------------------|--|

AO Recycling does not undertake design and development activities; therefore clause 8.3 of ISO 9001:2015 is excluded.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 4.3 | 4.3 | 4.3 |

IMS Structure

The IMS structure outlined below complies with the requirements of the following standards:

- BS EN ISO 9001:2015
- BS EN ISO 14001:2015
- BS ISO 45001:2018

The IMS consists of the following levels of documented information:

Level 1 – IMS Policy Manual

- The Organisation's policy in achieving the requirements of the Standards.

Level 2 – Procedures

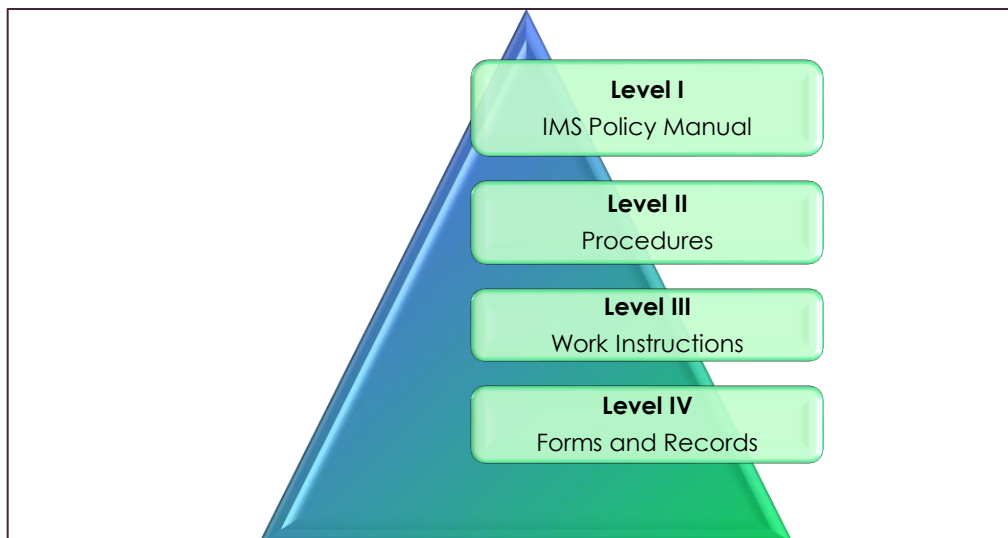
- The procedures used by the Organisation to achieve the requirements stated in the Policy (refer to Appendix 1 for details).

Level 3 – Work Instructions

- Detailed descriptions on how to conduct specific tasks.

Level 4 – Forms and Records

- Quality, Environmental and Occupational Health & Safety forms and records retained to provide historical data to support the system implementation and legislative, statutory and other requirements.



References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 4.4 | 4.4 | 4,4 |

Leadership and Worker Participation

Leadership & Commitment

Senior Management at AO Recycling demonstrates leadership and commitment with respect to all its Quality, Health, Safety and Environmental Management. This commitment is clearly defined in the organisation's policy statements and reflected throughout its procedural documents and systems of work.

To achieve this, the organisation's Top Management:

- Take accountability for the effectiveness of the IMS.
- Take overall responsibility and accountability for the prevention of work-related injury and ill health, as well as the provision of safe and healthy workplaces and activities.
- Ensure that organisational policies are established and maintained which are compatible with the organisation's context, its strategic direction and clearly communicate its commitment to Quality, Health & Safety and Environmental management.
- Establish and maintain Quality, Health, Safety and Environmental objectives for the IMS that are compatible with the organisation's context and its strategic direction.
- Ensures the IMS requirements are integrated into the Organisation's business processes.
- Ensure that physical and financial resources are made available for the implementation, management, and continual improvement of the IMS.
- Promote the importance of effective management and of conforming to the IMS requirements.
- Promote and implement a process approach and risk-based thinking.
- Fulfil the organisation's compliance obligations.
- Participate in the IMS review process

AO Recycling's Senior Management are 'customer focused' ensuring that all customer needs, applicable statutory & regulatory requirements are understood and met. An emphasis on enhancing customer satisfaction is also achieved via open and consistent communication. Customers are encouraged to also provide feedback as to the quality of service provided and opportunities for improvement.

AO Recycling's Senior Management encourages worker participation in the development, implementation, and maintenance of its IMS. To achieve this, AO Recycling protects workers from reprisals when reporting incidents, hazards, risks, and opportunities, implements processes for the consultation and participation of workers and supports the establishment and functioning of health and safety committees.

All roles, responsibilities, and authorities relevant to all AO Recycling employees are outlined in roles, responsibilities and authorities' section of this policy manual. In addition, roles and responsibilities are described in job position descriptions, employee contracts and work instructions.

To achieve the intended outcomes relating to leadership and commitment, AO Recycling's Top Management delegate their responsibility to the SHEQ Team but retain accountability for ensuring that the above-mentioned actions are performed.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 5.1 | 5.1 | 5.1 |

AO Recycling Quality Policy

AO Recycling is committed to pursuing excellence in everything it does, and this includes the management of Quality.

General Principles

AO Recycling and its management team are committed to provide services which meet the customers' specified contractual requirements ensuring that they comply with all Legal & Statutory requirements.

AO Recycling recognises that to provide and maintain a consistently high quality in the work it undertakes, and the material it produces, an effective Quality Management System (QMS) is necessary to ensure that proper communication, work control and accountable records are generated for all work undertaken.

AO Recycling is totally committed to using the best available techniques and continually improving its QMS to ensure its standards and objectives are capable of meeting (in all respects) the specified requirements and reasonable expectations of their customers.

It is the policy, therefore, of AO Recycling to control and conduct its business recycling waste electric and electronic equipment by means of a formalised system of modern quality management. This quality management shall be in accordance with the quality system requirements as specified in ISO 9001.

All members of AO Recycling staff are charged with promoting these aims and to observe and implement the company procedures defined in the performance of their work. Everyone connected with AO Recycling shall be supported according to their individual needs for personal development.

Robert Sant
Managing Director

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 5.2 | | |

AO Recycling Environmental Policy

AO Recycling is committed to pursuing excellence in everything it does, and this includes the protection of the environment.

General Principles

AO Recycling and its management team are committed to the care of the environment and the prevention of pollution.

AO Recycling seeks to recycle waste electric and electronic equipment in conformance with the relevant environmental legislation using the best available techniques and to the highest standard.

To ensure the achievement of the above commitment, AO Recycling has implemented an environmental management system which satisfies the requirements of BS EN ISO 14001.

An essential feature of the environmental management system is a commitment to continually improving environmental performance and the prevention of pollution which involves all levels of the business from senior management to operatives.

We expect staff, visitors, contractors and other employers who work at AO Recycling to share this commitment by complying with our policies and our procedures and to understand that they too have legal and moral obligations to themselves and to one another.

This policy is communicated to all staff during the induction process.

All members of AO Recycling staff are challenged with promoting our commitment to the environment and to meeting the high environmental standards and objectives.

Robert Sant
Managing Director

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| | 5.2. | |

AO Recycling Health & Safety Policy

AO Recycling is committed to conducting its business in a socially responsible manner, ensuring the protection of employees, stakeholders, customers, contractors, visitors, and neighbours. Occupational Health and Safety is a fundamental requirement for AO Recycling and is integrated into all workplace activities and business decisions. To express that commitment, I issue the following policy statement on occupational health and safety.

I as Managing Director together with my Head of Compliance, Directors and Senior Team shall comply with all AO.com, AO Recycling Health and Safety Policies; comply so far as is reasonably practicable with the requirements of the Health and Safety at Work etc. Act 1974 and all subsequent secondary Health and Safety Regulations applicable to our business.

I believe that all accidents should be preventable and that we will strive to continually improve our health and safety performance. We aspire to ZERO harm to all employees and any person whilst on our premises or engaged in activities in connection with AO Recycling activities.

Our approach to health and safety is structured and risk based. We strive to create a safe working environment by identifying risks, prioritising actions, adopting good practice, and ensuring that safe systems of work are in place through levels of active monitoring. The Directors, Head of Compliance and Senior Managers through the hierarchy of our Management structure with their Teams in all areas, shall be accountable for compliance with all applicable legal and corporate requirements.

I will provide the Leadership, resources, and training to implement this Policy. All employees shall be accountable for performing their jobs in accordance with our established procedures our work philosophy and regulatory requirements.

All employees share this responsibility and are accountable to maintain safe working conditions. Use all safe systems of work and equipment supplied for use in their work activities and help to protect our working environment. Both innovative and sound safety considerations shall be incorporated into our practices, process, and equipment decisions.

We shall together with our Health and Safety Champions use our Objectives, observations and reported Near Miss Reports as a means of improving our safe operating procedures and as a driver to improving AO Recycling health and safety culture.

The co-operation and involvement of are essential for the ongoing implementation of this Policy.

Robert Sant



Managing Director

Date

13/05/20

Andrew Sant



Head of SHE Compliance

Date

13/05/20

Dave Ware

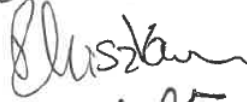


Commercial Director

Date

13/05/20

Richard Miskowski



Operations Director

Date

13/5/20

Gerrard Dolan



SHEQ Manager

Date

13/05/20

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| | | 5.2 |

Organisational roles, responsibilities and authorities

The Organisation charts in the Resources section of this policy manual illustrates the management structure and reporting lines.

AO Recycling - Organigram

| Position | Responsibilities |
|---------------------------------|---|
| Senior Leadership Team (SLT) | <ul style="list-style-type: none"> • Commitment to all company policies • Decide on resources needed to achieve Quality, Environmental and Occupational Health & Safety objectives. • Establishing effective downward communication systems and management structures. |
| Managing Director | <ul style="list-style-type: none"> • Has overall responsibility for setting objectives and targets. • Authorises company policies through liaison with Head of Compliance. • Ensures that adequate resources (people, skills, equipment, time money) are available. • Through regular Board Reports and Audit Reports is made aware of effectiveness of SHEQ Systems and implementation. |
| Head of Compliance SHEQ Manager | <ul style="list-style-type: none"> • Provide Managing Director with Board and Audit reports relating SHEQ performance. • Setting objectives and to receive feedback on the effectiveness of the Management systems. • To manage, guide and allocate tasks to the Compliance Team to ensure the effective management of Health and Safety, Environmental and Quality systems. • To ensure that the Compliance Team is sufficiently resourced to be effective. To select external competent resource where required in such areas of occupational hygiene, environment and other specialist fields. • To keep up to date with current legislation and ensure compliance with legislation. • To be the point of contact for Enforcing Authorities, 3RD Party Partners, e.g., ISO Auditors. RoSPA, AO Insurance Brokers and Provider • To make sure risk assessment and environmental aspects are documented and actions undertaken where there are risks to people, property, the environment, AO Recycling or AO.com. • To liaise with certificating bodies during 3rd party audits. • To collate accident, incident & quality data, analyse and input the information into Management Review. |

| Position | Responsibilities |
|--|---|
| Compliance Team | <ul style="list-style-type: none"> • Make sure through collaboration with Department Managers and AO.com, contractors used by the AO Recycling are competent and that relevant insurance is in place prior to using them. • To liaise and lead with certification bodies during 3rd party and internal AO Group audits. • To make sure risk assessment and environmental aspects are documented and actions undertaken where there are risks to people, property, the environment, AO Recycling or AO.com. • To establish, implement and maintain Health and Safety, Environmental and Quality Systems in accordance with relevant ISO standards. • To regularly monitor performance against AO Recycling objectives and targets. • To liaise with AO internal auditors during internal audits. • To keep up to date with current applicable legislation, Guidance, Standards and ensure compliance with appropriate legislation. • To provide support for Department Managers, Co Ordinators/Supervisors, Team Leaders, and employees in the fulfilment of their Health, Safety, Environmental and Quality duties. |
| Head of Department, Operations, Plant, Department Managers | <ul style="list-style-type: none"> • Review SHEQ performance within their department. • Promote a positive SHEQ culture by their actions and have a clear understanding of responsibilities within their structure. • Make sure risk assessments and work instructions are carried out by their Team. • Make sure supporting safe systems of work through work instructions are in place for all work activities and trained out to all relevant personnel in their areas of responsibility. This includes all temporary/Agency personnel carrying out tasks in their areas of responsibility. • Make sure adequate Supervision of SHEQ within their department. • Make sure any relevant actions generated on the electronic management systems used for EHS are completed in a timely manner. • Make sure staff at all levels receive appropriate training. • Liaise with employees to receive comments and suggestions on ways performance can be improved. • Make sure appropriate and prompt action is taken in the event of an incident occurring and investigate or aid in the investigation of accidents, incidents and near misses. |

| Position | Responsibilities |
|--|--|
| Co Ordinators, Supervisors, Team Leaders | <ul style="list-style-type: none"> • Promote a positive SHEQ culture by their actions and have a clear understanding of responsibilities within their structure. • Make and have good communication across all shifts for any HSE issues. • Make sure safe systems of work through work instructions are followed. • Make sure HSE matters are understood by new employees and / or Agency personnel. • Perform daily formal inspections of work areas, equipment, signage and report/rectify issues promptly. • Make sure required PPE is worn correctly in accordance with work instructions. • Make sure housekeeping standards are maintained. • Make sure appropriate and prompt action is taken in the event of an incident occurring and investigate or aid in the investigation of accidents, incidents and near misses. • Report all near miss events observed or informed about by Team personnel. • Encourage all personnel in their Team to report all unsafe acts, items, equipment or areas and record them as a Near Miss. • Make sure first aid cover is always available. • Make sure first aid boxes are checked monthly and are fully stocked. • Make sure spill kits are checked monthly and stocked fully. • Make sure there is at least 1 trained spills response person on their Team at all times. • Make sure Team personnel are trained to the required standards. • Make sure Team personnel carry out pre-use checks and visual inspections of work equipment, prior to use. • Make sure any identified HSE issues are followed up and closed out. • Report any potential HSE issues to Line Manager. • Report any breaches of HSE procedures to Manager and SHEQ Team. |

| Position | Responsibilities |
|-----------|--|
| Employees | <ul style="list-style-type: none"> • Understand the aspects of the Organisation's H&S Policy that affect them. • Take reasonable care of their own health and safety and that of others who may be affected by their activities. • Co-operate with the Organisation's representatives to allow the Company to comply with its statutory duties. • Work in accordance with the Organisation's H&S Policy and follow rules and instructions relating to safety and health. • Attend all training and briefings on matters of safety, health and the environment and act upon the information given. • Report all incidents to their Co Ordinator, Team Leader or Supervisor or Management, whether the incident results in injury, damage or not. • Make full and proper use of safety equipment and guards on machinery and operate equipment in accordance with instructions. • Not to interfere, damage or misuse any form of equipment provided for health and safety purposes. • Must only use personal protective equipment supplied by the company. Refrain from improvising and take proper care of all equipment provided for health and safety. • Report immediately any defect in equipment to a Co Ordinator, Team Leader, Supervisor or Management. |

In addition, role work instructions are in place for individual roles with responsibilities covered by the IMS. Role work instructions cover different levels of management, non-managerial and specialist personnel.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 5.3 | 5.3 | 5.3 |

Consultation and Participation of Workers

AO Recycling consults and encourages its employees to participate in the continuing development and improvement of its IMS.

The organisation:

- Provides processes, time, training, and resources deemed necessary for consultation and participation.
- Provide, in a timely manner, access to clear, understandable, and relevant information about the IMS.
- Identifies and removes obstacles to participation such as failure to respond to employee suggestions, language or literacy difficulties, policies that discourage employee participation, and minimise those that cannot be remove.
- Encourages consultation with non-managerial employees relating to a range of issues, including, but not limited to:
 - Determining the needs and expectations of interested parties.
 - Assigning roles and responsibilities.
 - Determining how to fulfil legal and other requirements.
 - Determining what needs to be monitored, measures and evaluated.
- Encourage the participation of non-managerial employees in a range of IMS activities and decisions.

Employee Forum and SHEQ committee meetings are held to facilitate effective consultation and participation. These meetings are documented and circulated to any interested parties.

In addition, employees are encouraged to participate in the following activities:

- Identifying hazards or aspects and assessing risks and opportunities.
- Determining actions to eliminate hazards and reduce Health & Safety or Environmental risks
- Investigating incidents, near misses and nonconformities and determining corrective actions.
- Developing and reviewing IMS policies and objectives.
- Developing new or improved arrangements and procedures.

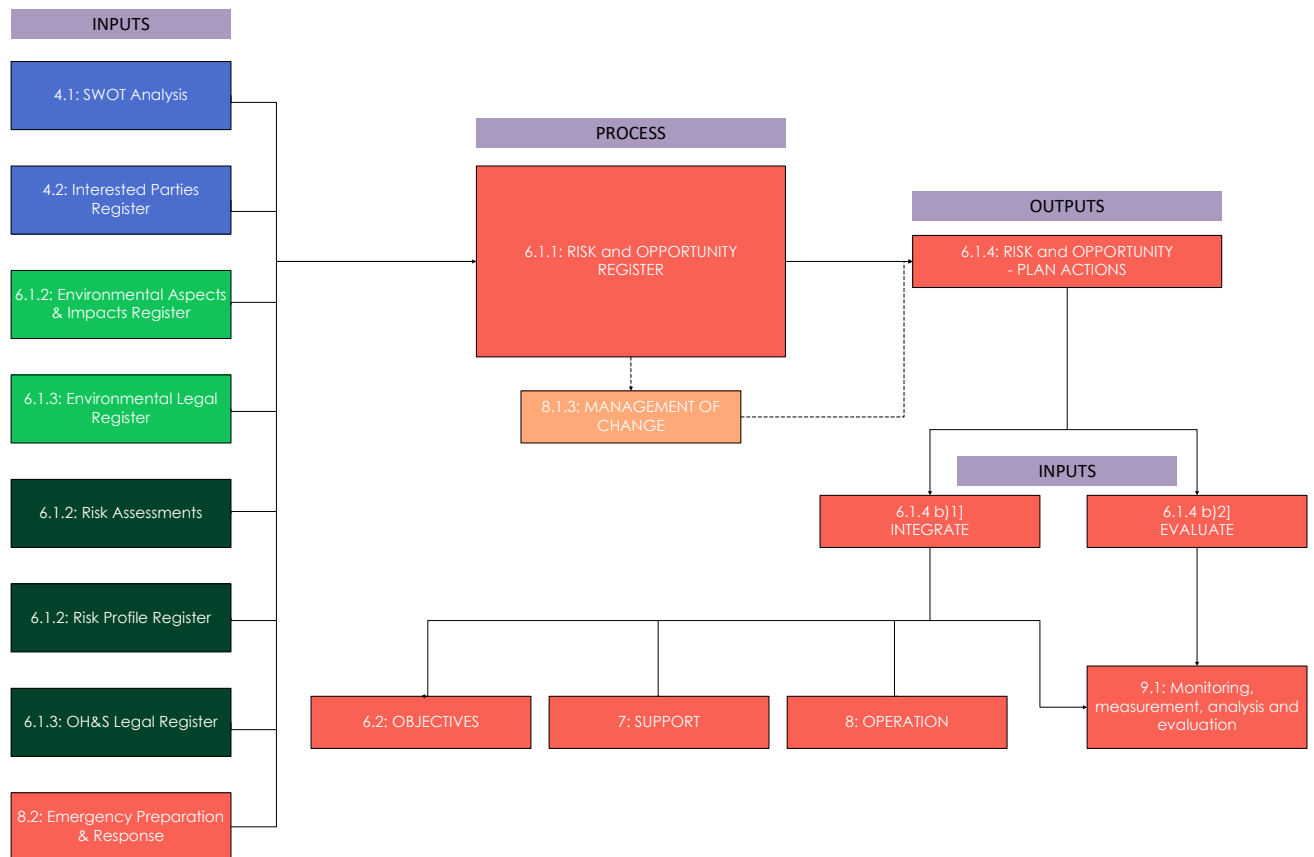
References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| | | 5,4 |

Planning

Actions taken to address risks and opportunities

Rigorous planning is undertaken by AO Recycling to ensure that intended outcomes of Quality, Health, Safety and Environmental Management are achieved. The organisation has examined its activities/services and have identified critical risk and opportunities for improvement to all aspects of its operations via its Risk and Opportunity Registers.



Occupational Health & Safety – Hazards

AO Recycling maintains a procedure and work instructions to support the identification of Health and Safety hazards, the risk assessment process and controls to be implemented to reduce risks related to its activities and services over which it has control or influence. Health and Safety hazards are identified and analysed for risks in the organisations risk assessments.

Risk assessments are monitored, reviewed, and revised either periodically, or where there has been a significant change, e.g. people, equipment, process, legislation or after an accident, incident or near miss.

Environmental Aspects and Impacts

AO Recycling maintains a procedure and work instructions to support the identification of environmental aspects of its activities and services that it can control and those it can influence in order to determine those that can have significant impact(s) on the environment. Environmental aspects and impacts are identified and analysed for significance in a register of Environmental Aspects & Impacts.

Legal & Other Requirements

AO Recycling maintains a procedure to assist with the identification of all aspects of the organisation's compliance requirements. This includes statutory & regulatory requirements, health, safety & environmental legal obligations, as well as other requirements to which the organisation subscribes. The organisation maintains compliance registers that categorises all compliance requirements relevant to its activities & services.

The organisation subscribes to several regulatory websites to ensure that it remains up to date with any new requirements or amendments to existing obligations. This process is maintained by the SHEQ Team.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 6.1 | 6.1 | 6.1 |

Objectives & Planning

Senior management at AO Recycling set quality, health, safety & environmental objectives for various levels and functions of the organisation.

AO Recycling maintains a procedure and work instructions to assist in setting strategic, tactical, operational, process, product, service, departmental and individual objectives, and targets for the organisation.

These objectives are measurable and established at least annually with consideration given to 'significant' Health & Safety hazards and Environmental aspects. Objectives are consistent with the organisation's individual quality, health and safety & environmental policies and are communicated to all levels and functions of the organisation via Management Review meetings, Management meetings, safety committee meetings and training.

In setting these objectives and targets, AO Recycling is mindful of:

- The company policies
- The relative importance of the environmental aspects
- Relevant legislation, etc.
- The view of any interested parties
- The need to prevent pollution in general
- Risk assessments and importance of the risk
- Quality implications

When establishing quality, health, safety & environmental objectives consideration is given to:

- What needs to be done to reduce the likelihood of the adverse impacts.
- What resources will be required to ensure achievement.
- Who will be responsible for the implementation & monitoring of various controls, as well as measuring achievement.
- Anticipated timeframes for achievement.
- How achievement will be evaluated.

Each objective is set out in a site register which identifies the need for setting the objective, the objective itself, the underpinning target(s), and key performance indicators, the stages of implementation, timescales and who is responsible for managing the campaign.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 6.2 | 6.2 | 6.2 |

Support

Resources

AO Recycling maintains sufficient resources for the implementation, maintenance & continual improvement of its IMS. The organisation appoints the SHEQ Team with the responsibility for the ongoing management of its IMS.

Financial resources are also made available to support the implementation of the organisation's IMS. Physical & financial resources are accounted for via the organisation's fiscal budgets.

People

The Senior Management Team (SLT) ensures that it provides sufficient staffing for the effective operation of the IMS, as well as identified processes and objectives.

Infrastructure

AO Recycling ensures that infrastructure required for the operation of its processes and to achieve conformity of its products and/or services is in place. The Organisation considers the following requirements:

- Buildings and associated utilities
- Equipment, including hardware and software
- Transportation resources
- Information and communication technology.

Environment for the Operation of Processes

AO Recycling maintains a procedure, work instructions and records to assist in determining, providing and maintaining a safe working environment to achieve conformity of its products and/or services.

Consideration is given to both physical and human factors.

Monitoring and Measuring Resources

AO Recycling ensures that all work equipment and mobile plant is serviced, maintained, inspected and if applicable, calibrated in accordance with statutory, regulatory and other requirements.

The Organisation's SHEQ Team in collaboration with applicable Departments, manages all aspects of monitoring, measuring, analysis and evaluation. The Organisation maintains a procedure to support this requirement.

In addition, the SHEQ Team maintains an inspection register to aid in the management of statutory inspections and calibrations.

When measurement traceability is a requirement, or is considered by AO Recycling to be an essential part of providing confidence in the validity of measurement results, measuring equipment is:

- Calibrated or verified, or both, at specified intervals, or prior to use, against measurement standards traceable to international or national measurement standards;
- Identified in order to determine their status; and
- Safeguarded from adjustments, damage or deterioration that would invalidate the calibration status and subsequent measurement results.

AO Recycling determines if the validity of previous measurement results has been adversely affected when measuring equipment is found to be unfit for its intended purpose, and takes appropriate action as necessary.

Organisational knowledge

The Organisation have determined and have the knowledge necessary to operate its processes when achieving conformity of our products and services.

When addressing changing needs and trends, AO Recycling considers its current knowledge and determines how to acquire or access any necessary additional knowledge and required updates.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 7.1 | 7.1 | 7.1 |

Competence

AO Recycling ensures that any worker engaged to undertake activities or provides a service is suitably qualified and has sufficient competence.

Prior to employment the HR Department identifies the required experience, qualifications, etc. required by prospective candidates. These requirements are clearly defined in all position descriptions, with competency and experience assessed as part of the interview process.

To further support the competency of all workers, the organisation maintains a training matrix that identifies all qualification, training & other requirements for various defined roles. The register is maintained by Managers in collaboration with HR/SHEQ Team and is regularly reviewed and updated to ensure workers hold all current licences, accreditation, and experience.

AO Recycling maintains a Procedure to assist with the identification of all aspects of the organisation's training requirements. This includes statutory & regulatory requirements, health, safety & environmental legal obligations, as well as other requirements to which the organisation subscribes.

AO Recycling maintains a Procedure in order to ensure that all contractors and subcontractors maintain current licences and accreditation and possess relevant experience & competence prior to work being undertaken. Contractor's competence and qualifications are monitored using the Approved Contractor Register and associated records.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 7.2 | 7.2 | 7.2 |

Awareness

AO Recycling's takes time to ensure that all employees are aware of the requirements of its IMS and associated processes.

The organisation achieves this by:

- Communicating to all stakeholders' requirements of its quality, health, safety, and environmental policies.
- Making these policies publicly available and displayed on site.
- Regular communication of organisation objectives.
- Conducting IMS awareness training for all employees.
- Communicating the benefits of employee contribution to participating in relevant aspects of the IMS.
- Communicating to all employees the implications for non-conformance.

AO Recycling conduct regular awareness training to ensure that all employees are aware of not only the organisations, but their responsibility for the implementation, maintenance, and continual improvement of all aspects of the IMS.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 7.3 | 7.3 | 7.3 |

Communications

AO Recycling maintains a procedure to ensure effective communication and consultation across all the organisation's levels and functions. The procedure clearly defines:

- What will be communicated?
- When communication is to occur?
- Who will be communicated to?
- How communication is to occur?
- Who will be responsible for the communication?

The organisation also ensures that all legal and other requirements are communicated to all employees, contractors, subcontractors and interested parties via operational controls, such as the distribution of procedures and work instructions, toolbox talks, inductions, committee meetings, training etc. Any matter requiring immediate attention is notified to staff by memo.

Communications to external parties are documented in a communications register.

AO Recycling has decided not to make information on its significant environmental aspects publicly available, however it will happily respond to requests for information.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 7.4 | 7.4 | 7.4 |

Documented information

AO Recycling maintains a procedure and supporting processes ensure the control of all aspects of document and data management. The procedure clearly defines:

- How documents can be located.
- How documents are reviewed and revised, as necessary.
- Documents are authorised prior to release and are circulated to named persons or locations.
- Documents that need to be retained for historical or legal purposes are clearly marked as withdrawn.
- Where documents are held on computer for direct reference, any printed copy is automatically classified as 'uncontrolled'.

Creating and updating

The organisation's documented procedure outlines the process for creating and updating policies, procedures, documents, forms, and checklists. It defines the approval process, the document identification and description, as well as the process for review & issue. The SHEQ Team maintains site registers to support all aspects of document creation, storage, and review.

Control of documented information

AO Recycling maintains processes to ensure that all policies, procedures, documents, forms, and checklists are available for use where required and are adequately protected. The SHEQ Team maintains site registers to support control, distribution, storage, versioning, retention & disposition.

Documents to be retained and their retention times are listed in the register.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 7.5 | 7.5 | 7.5 |

Operations

Operational Planning & Control

AO Recycling identifies, plans, and implements control measures to ensure the quality, safety, environmental integrity of its processes is not compromised.

A variety of operational controls employed by the organisation include, but are not limited to:

- Hazard identification and Risk Assessments
- Job safety analysis (JSA)
- Work instructions
- Daily pre-user checks
- Housekeeping activities
- Consultation and participation of employees
- Risk and Legal registers, Aspects, and Impacts Register
- Inspection and maintenance programmes
- Permits-to-Work
- Health surveillance

In addition, procedures have been created and implemented regarding the control of operations at AO Recycling to ensure compliance with the organisation's policies, legal and other requirements.

When determining control measures, reference is made to the 'hierarchy of controls' which provides a structured guide in eliminating/reducing risks and thus presenting opportunities. In addition, consideration is given to Technical, Procedural and Behavioural measures. The hierarchy is as follows:

- Hazard Elimination: removing the hazard completely
- Substitution: by replacing the dangerous by the non-dangerous, or the less dangerous
- Engineering controls/work reorganisation:
- Administrative controls/training
- Use of personal protective equipment.

Management of change

AO Recycling maintains a procedure and supporting processes to ensure the control of all aspects of the management of change. This ensures planned changes are controlled and reviews the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary. Management of Change generated are recorded on a Management of Change Register.

When planning changes, the Organisation shall consider:

- The purpose of the changes and their potential consequences
- The integrity of the IMS
- The availability of resources
- The allocation or reallocation of responsibilities and authorities

Planned changes gives AO Recycling the opportunity for improvement of its IMS system etc.

Procurement

AO Recycling maintains a procedure and supporting processes to ensure that procurement processes control potential hazards and reduce Health, Safety, Environmental and Quality risks associated with products, raw materials, substances, new equipment/machinery, services etc. being introduced into the workplace.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 6.3, 8.1 | 8.1 | 8.1 |

Emergency preparedness and response

AO Recycling maintains a procedure and associated processes to identify potential for emergency situations and incidents that can impact on health, safety, the environment, or quality of the services associated with its operations.

Emergency Response and Business Continuity Plans have been developed and maintained for a variety of scenarios for the site.

Scenarios considered, but are not limited to:

- Medical emergencies and First Aid
- Fire and Evacuation
- Explosion
- Bomb Threat
- Adverse Weather
- Spill/Release of Hazardous Substance(s)

The plans and associated procedures aid in the control of emergency situations and to overcome any consequential environmental impacts etc. In addition, the documents mentioned above, emergency conditions are identified within operating procedures. All Emergency Preparedness & Response Plans are periodically tested and reviewed.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| | 8.2 | 8.2 |

Requirements for products and services

Customer Communication

Communication with customers includes:

- a) Providing information relating to products and services;
- b) Handling enquiries, contracts or orders, including changes;
- c) Obtaining customer feedback relating to products and services, including customer complaints;
- d) Handling or controlling customer property; and
- e) Establishing specific requirements for contingency actions, when relevant

Determining the Requirements Related to Products and Services

When determining the requirements for the products and services to be offered to customers, AO Recycling ensures that:

- a) The requirements for the product and services are defined; including
 - a. Any applicable statutory and regulatory requirements;
 - b. Those considered necessary to AO Recycling
- b) AO Recycling can meet the claims for the product and services it offers.

Review of requirements related to products and services

AO Recycling ensures that it has the ability to meet the requirements for products and services offered to customers. AO Recycling conducts a review before committing to supply products and services to a customer, to include:

- a) Requirements specified by customer, including the requirements for delivery and post-delivery activities;
- b) Requirements not stated by the customer, but necessary for the specified intended use, when known;
- c) Requirements specified by AO Recycling;
- d) Statutory and regulatory requirements applicable to the products and services; and
- e) Contract or order requirements differing from those previously expressed.

AO Recycling ensures that the contract or order requirements differing from those previously defined are resolved.

The customer's requirements are confirmed by AO Recycling before acceptance, when the customer does not provide a documented statement of their requirements.

AO Recycling retains documented information, as applicable;

- a) On the results of the review; and
- b) On any new requirements for the products and services

Changes to requirements for products and services

AO Recycling ensures that relevant documented information is amended, and that relevant persons are made aware of the changed requirements, when the requirements for products and services are changed.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 8.2 | | |

Design & Development of Products and Services

AO Recycling maintains design and development procedure and associated processes to manage the design and development of new products, services and processes.

The following aspects of the design and development process are considered:

- Identification and evaluation of need for new products, services and processes;
- Planning – determining the stages, resources and controls required;
- Inputs – identifying the requirements essential in realising new product, service, process;
- Controls – to ensure results to be achieved are defined, verification activities, validation activities;
- Outputs – which meet input requirements and are adequate;
- Changes – either during process or after, are identified, reviewed and controlled and do not impact on conformity to requirements.

AO Recycling shall retain documented information on all aspects of the design and development process.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 8.3 | | |

Control of externally provided processes, products and services

AO Recycling maintains a procedure to aid in all aspects of purchasing externally provided products and services which conform to specified purchase requirements.

AO Recycling evaluates and selects suppliers based on their ability to supply products and services in accordance with the Organisation's requirements.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 8.4 | | |

Production and service provision

Control of production and service provision

AO Recycling implements production and service provision under controlled conditions. Controlled conditions include, as applicable:

- a) The availability of documented information that defines:
 - a. The characteristics of the products to be produced, the services to be provided, or the activities to be performed;
 - b. The results to be achieved
- b) The availability and use of suitable monitoring and measuring resources;
- c) The implementation of monitoring and measuring activities at appropriate stages to verify that criteria for control of processes or outputs, and acceptance criteria for products and services have been met;
- d) The use of suitable infrastructure and environment for the operation of processes;
- e) The appointment of competent persons, including any required qualifications;
- f) The validation and periodic revalidation, of the ability to achieve planned results of the processes for production and service provision, where the resulting output cannot be verified by subsequent monitoring or measurement;
- g) The implementation of actions to prevent human error; and
- h) The implementation of release, delivery and post-delivery activities.

Identification and traceability

AO Recycling uses suitable means to identify outputs when it is necessary to ensure the conformity of products and services.

AO Recycling identifies the status of outputs with respect to monitoring and measurement requirements throughout production and service provision.

AO Recycling controls the unique identification of the outputs when traceability is a requirement and retains the documented information necessary to enable traceability.

Property belonging to customers or external providers

AO Recycling exercises care with property belonging to customer or external providers while it is under AO Recycling's control

AO Recycling identifies, verifies, protects and safeguards customer's or external providers' property provided for use or incorporation into the products and services.

When the property of a customer or external provider is lost, damaged or otherwise found to be unsuitable for use, AO Recycling reports this to the customer or external provider and retains documented information on what has occurred.

Preservation

AO Recycling preserves the outputs during production and service provision, to the extent necessary to ensure conformity to requirements.

Post-delivery activities

AO Recycling meets requirements for post-delivery activities associated with the products and services.

In determining the extent of post-delivery activities that are required, AO Recycling considers:

- a) Statutory and regulatory requirements;
- b) The potential undesired consequences associated with its products and services
- c) The nature, use and intended lifetime of its products and services;
- d) Customer requirements; and
- e) Customer feedback

Control of changes

The Organisation reviews and controls changes for production or service provision, to the extent necessary to ensure continuing conformity with requirements.

AO Recycling retains documented information describing the results of the review of changes, the person(s) authorizing the change, and any necessary actions arising from the review.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 8.5 | | |

Release of products and service

AO Recycling has implemented planned arrangements, at appropriate stages, to verify that the product and service requirements have been met.

The release of products and services to the customer, do not proceed until the planned arrangements have been satisfactorily completed, unless otherwise approved by a relevant authority and, as applicable, by the customer.

AO Recycling retains documented information on the release of products and services. The documented information includes:

- a) Evidence of conformity with the acceptance criteria;
- b) Traceability to the person(s) authorising the release.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 8.6 | | |

Control of nonconforming outputs

AO Recycling ensures that outputs that do not conform to their requirements are identified and controlled to prevent their unintended use or delivery.

AO Recycling takes appropriate action based on the nature of the nonconformity and its effect on the conformity of products and services. This also applies to nonconforming products and services detected after delivery of products, during or after the provision of services.

AO Recycling deals with nonconforming outputs in one or more of the following ways:

- a) Correction;
- b) Segregation, containment, return or suspension of provision of products and services;
- c) Informing the customer; and
- d) Obtaining authorisation for acceptance under concession.

Conformity to the requirements are verified when nonconforming outputs are corrected.

AO Recycling retains documented information that:

- a) Describes the nonconformity;
- b) Describes the action taken;
- c) Describes any concessions obtained; and
- d) Identifies the authority deciding the action in respect of the nonconformity.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 8.7 | | |

Performance Evaluation

Monitoring, measurement, analysis, and performance evaluation

AO Recycling plan and implement active monitoring, measurement, analysis, and improvement processes to demonstrate product conformity and to ensure conformity with, and improvement to, the Integrated Management System and the organisational policies and objectives.

The organisation maintains a procedure and associated processes to ensure:

- What requires measuring and monitoring.
- The methods for monitoring, measuring, analysis and evaluation are applicable to ensure valid results.
- When monitoring and measuring is to be performed.
- How the results from monitoring and measuring are to be analysed and evaluated.
- Plant and equipment that needs to be calibrated.
- The effectiveness of IMS implementation.
- Meaningful communication of performance with interested parties.

Customer Satisfaction

To ensure the continual improvement of the product and services provided by the organisation, AO Recycling monitors customer/client perceptions and satisfaction. Site Management maintain communication with the customers/clients to ensure needs and expectations are realised. The organisation also provides customers/clients with the opportunity to provide feedback on the products and services provided.

Evaluation of compliance

AO Recycling maintains procedures and supporting processes for evaluating compliance with legal and other requirements. This is facilitated by the SHEQ Team and is achieved by a program of internal and external reviews/audits.

AO Recycling analyses and evaluates appropriate data and information arising from monitoring and measurement.

The results of analysis are used to evaluate:

- a) Conformity of products and services
- b) The degree of customer satisfaction
- c) The performance and effectiveness of the IMS
- d) If planning has been implemented effectively
- e) The effectiveness of actions taken to address risks and opportunities
- f) The performance of external providers
- g) The need for improvements to the IMS.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 9.1 | 9.1 | 9.1 |

Internal Audits

AO Recycling maintains a procedure and associated processes that defines the mechanism of internal audits to determine conformity with the requirements of the Integrated Management System.

This includes an annual assessment of the effectiveness of the organisation's IMS, as well as evaluation of legal and other requirements. The procedure determines audit criteria, scope, frequency and methodology and details responsibilities and requirements for planning and conducting internal audits, and for reporting results and maintaining records.

An audit program is maintained to assess the effectiveness of processes for quality, health, safety & environmental management. The program includes planned audits, compliance evaluations and inspections of IMS procedures, instructions, and processes.

An Internal Audit Register has been developed and maintained to manage the internal audit programme.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 9.2 | 9.2 | 9.2 |

Management Review

AO Recycling reviews its IMS periodically to ensure its continuing suitability, adequacy, and effectiveness. AO Recycling maintains a documented procedure to conduct management reviews.

Management reviews includes, but is not limited to:

- An assessment of internal & external audit findings.
- Identified opportunities for improvement.
- Progress against completion of Objectives & Management Plans
- A review of new policies, procedures, and processes.
- A review of required amendments to policies, procedures, and processes.
- Adequacy of resources.
- Legal and Other requirements (new and amendments);
- Significant hazards and aspects.
- Emergency & incidents.
- Training requirements.
- Customer/Client feedback.
- The performance of external service providers.
- Non-Conformities.
- Opportunities for improvement.
- Threats, challenges & competitors.
- The status of corrective and preventative actions.

Management review reports are compiled detailing the assessment findings and recommended actions related to amendments to the organisation's IMS, associated policies, procedures, forms, registers, processes, and other elements relevant to support continual improvement.

Reports are reviewed by Senior Management.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 9.3 | 9.3 | 9.3 |

Improvement

Incident, nonconformity, and corrective action

AO Recycling maintains procedures and associated processes to identify and address opportunities for addressing incidents, opportunities for improvements, non-conformance and preventative actions associated with its activities.

The organisation's process for the management of incident, nonconforming & corrective action aims to ensure:

- The collection of information and records to support the effectiveness of all aspects of AO Recycling's IMS.
- Opportunities for improvement are identified and appropriate action assigned.
- Non-conforming products is prevented from inadvertent use or installation.
- Non-conformances relating to organisational activities and application of all aspects of the IMS are identified with corrective action assigned.
- All potential non-conformances are identified.
- All non-conformance is recorded, analysed to determine root causes, and actioned to avoid their recurrence.
- All corrective and preventive actions are reviewed to determine their effectiveness and any necessary changes to IMS documentation reflecting the corrective or preventive actions are undertaken.
- Processes are in place for reporting and investigating incidents and other nonconformities, and for taking action to correct them and deal with their consequences.

An Incident Register has been developed and maintained to manage and address opportunities as described above.

References:

| | | |
|------------|------------|------------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 10.1, 10.2 | 10.1, 10.2 | 10.1, 10.2 |

Continual improvement

AO Recycling is committed to the continual improvement of its Integrated Management System to improve its suitability, adequacy, and effectiveness. To achieve this the organisation considers the results from analysis and evaluation of performance, as well as outputs from Management Review to any needs or opportunities that need to be addressed to facilitate continual improvement.

References:

| | | |
|----------|-----------|-----------|
| ISO 9001 | ISO 14001 | ISO 45001 |
| 10.3 | 10.3 | 10.3 |

Appendix 1 – Index

| ISO Clause(s) | Procedure | Description |
|---------------|-----------|--|
| 4.1 | N/A | Organisational context |
| 4.2 | N/A | Interested Parties |
| 4.3 | N/A | Scope |
| 4.4 | N/A | Management System and its processes |
| 5.2 | N/A | Policy statements |
| 5.3 | 32 | Organisational roles, responsibilities & authorities |
| 5.4 | N/A | Consultation & participation of workers |
| 6.1 | 04 | Environmental Compliance |
| 6.1 | 02 | Environmental Aspects & Impacts |
| 6.1 | 03 | H&S Compliance |
| 6.1 | N/A | Risk and opportunity |
| 6.1 | 01, 30 | Risk Assessment & work instruction |
| 6.2 | 05 | Objectives |
| 7.1 | N/A | Inspection & calibration |
| 7.1 | N/A | Work Environment |
| 7.2 | 09 | Contractor Management |
| 7.2 | 08 | Training |
| 7.4 | 10 | Communications |
| 7.5 | 11 | Document Control |
| 8.1 | 20 | Maintenance |
| 8.1 | 18 | Management of Change |
| 8.1 | N/A | Procurement |
| 8.1 | 17 | Waste Management |
| 8.1 | 31 | Waste pre-acceptance & acceptance |
| 8.1 | 28 | Ammonia Process |
| 8.1 | 13 | Handling, sorting & storage of WEEE prior to treatment |
| 8.1 | 14 | Preparing for Re-use & Re-use |
| 8.1 | 15 | Treatment of WEEE & fractions |
| 8.1 | 17 | Drainage controls |
| 8.1 | 27 | Plant settings (changeover) |
| 8.1 | 13 | Recycling Process |
| 8.2 | 21 | Emergency preparation & response |
| 8.5 | 15-SP | QA Process |
| 9.1 | 34 | Monitoring, measurement, analysis & performance evaluation |
| 9.2 | 23 | Internal audit |
| 9.3 | 24 | Management Review |
| 10.2 | 26 | Incident reporting & RCA |
| 10.2 | 25 | Non-conformity & corrective action |
| 10.3 | N/A | Continual improvement |