



**ECOBAT LOGISTICS**

**Crescent Works**

**Willenhall Road**

**Darlaston WS10 8JR**

**Wednesbury , West Midlands**

**Permit EPR/DB3704FG**

**Permit Variation EPR/DB3704FG/V006**

**[ ECOBAT Variation Doc 6 ]**

**Integrated Business Manual - contents:-**

- 6a- Business Overview
- 6b- Operational Management Systems
- 6c- Environment Management Systems
- 6d- Quality Management Systems
- 6e- Safety Management Systems
- 6f- Annexes

WP

20<sup>th</sup> January 2022



ECOBAT Logistics

Integrated Business Manual

Date of Issue: July 2021

Version: 13

# ECOBAT L O G I S T I C S

## Integrated Business Manual

Issued: July 2021  
Version 13



Prepared by: Compliance Officer

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CONTROLLED IF IT IS PRINTED**





## Foreword

ISO's revision of the 14001:2004 Environmental Management System and 9001:2008 Quality Management System standards in 2015 and, the 45001:2018 Occupational Health and Safety Management System in 2018, resulted in a standardised structure, having a 'commonality' of numerous clauses and sections, including Management Review, Controlling documented information and Internal auditing.

There is no longer the requirement for organisations to maintain a top-level IMS manual in the 2015 & 2018 versions of the ISO 14001, 9001 & 45001 standards, however, the Leadership Team of Ecobat Logistics consider it is a good business practice to retain one, although not in the complex format as previously known.

Company's employees are encouraged to refer to this manual for guidance on its system processes that if adhered to, will ensure that any adverse environmental impacts resulting from its day to day business activities on and off site will be minimized to a tolerable level, and the needs and expectations of its interested parties will be met.

We acknowledge the 'commonalities' of numerous sections in the ISO 14001:2015, ISO 9001:2015 & ISO 45001:2018 standards and that is reflected in the way this manual has been structured, providing ease of reference, and relevant and applicable guidance, following the complete integration of the company's environmental, quality and safety management systems.

As a result, this manual has been structured in Six sections:

- Business overview (the *context* of the organisation)
- Common Management system controls to ISO 14001:2015, ISO 9001:2015 & ISO 45001:2018
- Environmental Management system controls applicable to ISO 14001:2015
- Quality Management System controls applicable to ISO 9001:2015
- Safety Management System controls applicable to ISO 45001:2018
- Annexes

**Manual revision record**

DATE OF CHANGE	REASON FOR / DESCRIPTION OF CHANGE	MANUAL REVISION No.
01 <sup>st</sup> August 2016	Business Manual created for the eventual integration of ISO14001:2015 Environmental and ISO 9001:2015 Quality Management systems of Ecobat Logistics. ISO 14001:2015 clauses added.	01
22 <sup>nd</sup> September 2016	Incorporation of the clauses specific to the ISO 9001:2015 standard	02
24 <sup>th</sup> October 2016	Numerous amendments and insertions resulting from the ISO 9001:2015 upgrade recertification audit	03
7 <sup>th</sup> December 2017	Organisation Chart interested party's needs & expectations	04
28 <sup>th</sup> March 2018	Roles and Responsibilities, working instructions references, Site Plans (Annex's)	05
23 <sup>rd</sup> November 2018	General Updates Including ECOBAT Logistics	06
02 <sup>nd</sup> July 2019	Roles and Responsibilities, Business Scope, Annexes	07
12 <sup>th</sup> August 2019	Incorporation and integration of business manual to include ISO 45001:2018 standards	08
28 <sup>th</sup> October 2019	General updates	09
9 <sup>th</sup> December 2019	General Updates including safety committee	10
1 <sup>st</sup> April 2020	General Updates	11
10 <sup>th</sup> March 2021	Roles and Responsibilities and Annex update	12
2 <sup>nd</sup> July 2021	Business Scope, Organisation and Business Activities update	13
8 <sup>th</sup> November 2021	Updates that include Shredding of Lithium – ion Electric vehicle batteries for recycling.	14



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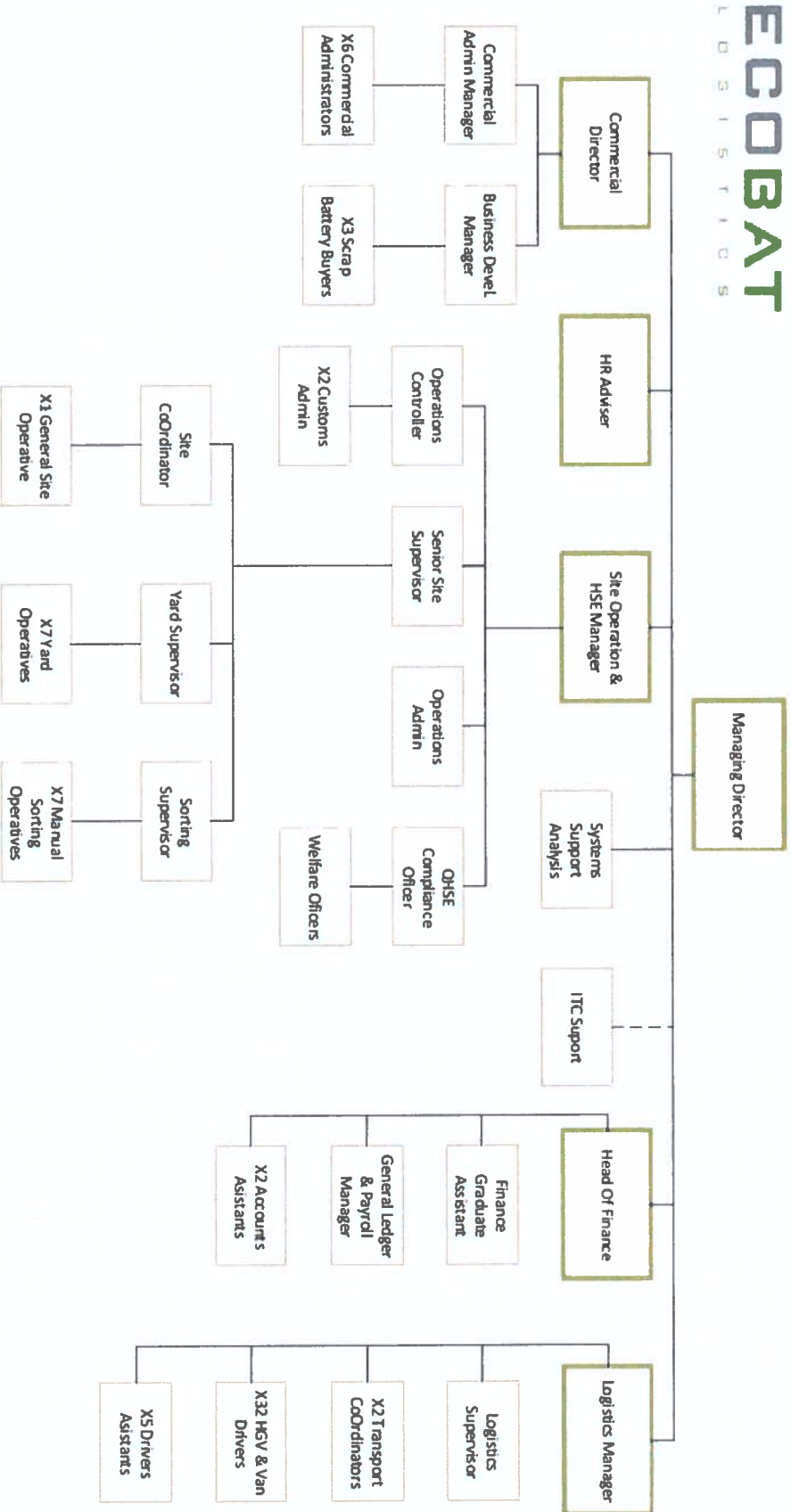


**Section ONE Business overview – the context of Ecobat Logistics**



**Organisation of the company**

This chart broadly illustrates how the business of Ecobat Logistics is structured and defines the *Leadership Team* as being responsible for the governance and execution of the company’s environmental and quality management systems, either directly or by delegation.

If the Leadership Team delegates any actions to others it remains accountable to ensure they are performed competently and in a timely manner.





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## Leadership

### Leadership and Commitment

The Leadership Team (LT) of the company is committed to this integrated Safety, Environmental and Quality Management System and acknowledges that whilst activities and responsibilities may be delegated to others within the business, the LT is ultimately accountable to ensure that any delegated activities are carried out correctly and in a timely manner.

The LT has established its Policies and agreed Objectives and will ensure that adequate resources are provided so its management systems will continue to deliver their intended outcomes, employee participation and customer satisfaction. The LT will also encourage and support employees to contribute towards the effectiveness of these systems and help develop a culture of continual improvement.

### Roles and Responsibilities of the Leadership Team

#### Managing Director

**Role:** To lead the business from the front, with the ultimate responsibility to ensure that all functions, processes and activities of the company are performed in a legally-compliant manner. This includes those that have been delegated to other members of the Leadership Team, and beyond.

The ultimate arbiter of all internal and external matters regarding the company, having overarching responsibility for its Quality, Environmental and safety Management Systems.

#### Finance Manager

**Role:** To control Finance within the business. Responsibilities include:

- reporting directly into the European Finance Manager and Entity Managing Director
- negotiating and overseeing stakeholder contracts
- overseeing the overall corporate budgeting preparation, management and monitoring processes.
- performing account reconciliation activities
- overseeing all financial transactions
- establishing accurate forecasts for expenses, revenues, cash, and operational activity and managing other internal reporting requirements.
- monitoring competitor activity and keeping abreast of industry intelligence and trends

#### Operations Manager

**Role:** To manage all day-to-day production processes and activities on site and at the company's transfer stations. Responsibilities include:

- overseeing all day to day operational processes, to ensure they legally fulfil business requirements
- managing and maintaining operational objectives, evaluating business performance and making changes for improved business performance
- implementing and overseeing operational improvement projects
- forecasting and preparing budgets, maximising the profitability of the operation and implementing cost controls as necessary
- justifying CAPEX for operational improvements
- liaising with leadership team and departmental heads to ensure all aspects of service to the customer is achieved, including compliance with legal standards



### Commercial Director

**Role:** To maintain the customer accounts administration systems and customer service within EBL and to manage the customer service team and the battery collection request process. Responsibilities include:

- managing and developing the customer service team, ensuring accurate operating procedures are followed e.g. precise collection information is obtained, accurate data input and collection release paperwork is prepared, etc.
- organising the customer services team to liaise effectively between customers, operational, logistics and finance departments to answer and progress enquiries; ensuring that the highest level of service is extended to both internal and external parties at all times
- co-ordinating with the Finance department when working on customers monthly reports, to determine charges, payments and outstanding invoices
- reporting to the Environment Agency on a quarterly or annual basis, the evidence notes raised, material received / despatched into ABTO and ABE, along with collections made by EBL
- contributing to the commercial decision-making process by liaising with the Managing Director and the Business Development Manager and sharing field intelligence that has been gathered by the customer service team.
- being the key focal point for customer service issues within the company

### Logistics Manager

**Role:** To provide the business with a cost-effective and legally-compliant road haulage service for the transportation of incoming and outgoing waste and obsolete batteries. Responsibilities include:

- enhancing the efficiency and optimising performance of the company's Logistics department
- effectively planning and agreeing schedules, motivating the team to meet challenging timelines and maintaining the regulatory compliance of the fleet.
- liaising internally with Customer service, Commercial, Accounts and Operations to ensure that customers' needs and expectations are achieved and if possible, exceeded.
- preparing budgets; monitoring expenditure and making business cases for CAPEX and REVEX expenditure within the scope of Logistics activities
- ensuring that all legislation, such as ADR and the Hazardous Waste Regs are complied with at all times
- ensuring vehicle maintenance, safety, repairs and all legal requirements are met.

### Compliance Department

**Role:** To provide guidance and assistance on matters of a regulatory and compliance nature and to report the performance of the company's ISO 9001:2015 Quality, ISO 14001:2015 Environmental, and ISO 45001:2018 Safety Management Systems, together with any opportunities for improvement, to the Leadership Team.

**Responsibilities include:**

- creating, maintaining and proactively applying the Quality and Environmental management system procedures of the company
- undertaking internal Quality and Environmental audits
- liaising with the Environment Agency to maintain and update site permits as required
- ensure all site permits requirements are met in regard to; volumes on site, types of material on site, storage conditions, effluent discharge/air emissions
- overseeing the preparation and administration of the annual ABTO/ABE application and ensure conditions are met including; audit recyclers, administer PSLA protocol
- identifying Aspects and Impacts, reviewing the Aspects and Impacts register, assessing and reassessing Impact scores, identifying key Impacts

- reviewing company performance against Quality and Environmental Objectives and key performance indicators, including underlying trends, exceptional performance and continual improvement, and reporting numerical performance information for monthly management meetings and Management review meetings
- ensure that the management systems 14001, 9001 & 45001 conform to the requirement of the standards

#### HR Manager

**Role:** An integral member of the company assisting with the development of the businesses and the people and cultures within them. Responsibilities include:

- Implementing and developing the Investors in People accreditation throughout both businesses.
- the recruitment of employees and ensuring legal eligibility of employment and best practice. Managing and developing the induction processes with departmental managers. Sourcing appropriate training and development of training matrixes and updating individual training records.
- collaborating with Leadership team to advise and benchmark the annual pay reward, ensuring the reward structure is equal, fair and consistent.
- managing the performance review process and job evaluation as necessary, providing advice and guidance to managers.
- collaborating with the European HR Director to discuss and decide development of divisional policies, procedures and best practices for EBL handbooks
- continual development as necessary to help stay compliant to current legislation, providing guidance to management to act in accordance with the everchanging employment legislation.

## Site details

Address: Crescent Works Industrial Park,  
Willenhall Road,  
Darlaston,  
Wednesbury  
West Midlands,  
WS10 8JR

This is the company's business postal address, to where collected waste batteries are returned, sorted by chemistries, then forwarded to recyclers within the group in the UK; and abroad, **or in the case of Electric Vehicle Lithium-ion batteries recycled at this postal address.**

The following seven pages describe the considerations that have been made by the Leadership Team whilst determining the scope and context of the business.

The scope of Ecobat Logistics will always be made available to interested parties upon request.



## Business activities

Ecobat Logistics is a specialist service provider that operates in the non-hazardous & hazardous waste management industry. It is the largest nationwide collector of lead-acid batteries in the UK.

Its business operations comprise the collection, sorting and consolidation by chemistries, of separated fractions of waste and obsolete batteries for forwarding to the recyclers. Its business is divided into two main commercial activities;

### 1. Lead-acid batteries – collection and recycling

All types of lead acid batteries are handled including:

- Automotive
- Industrial traction batteries
- Stand-by Power and Telecommunication batteries

Batteries are collected from Government departments, Utilities, major international companies, PLC's, regional businesses and SME's and sole traders; from thousands of locations across the UK including:

- Civic Amenity Sites
- Factories, Offices and workshops
- Car and truck dealers and service centres
- Fork lift truck dealers and service centres
- Fleet operators
- Defence establishments
- Telephone exchanges and other telecommunications establishments
- Computer network operators

### 2. Batteries other than Lead-acid type - collection - sorting - export

Ecobat Logistics is the largest nation-wide collector of waste non-lead acid batteries in the UK. The company is fully-licensed to handle all types of non-lead acid portable batteries, both rechargeable and single-use including:

- Nickel Cadmium
- Nickel Metal Hydride
- Lithium
- Lithium Ion
- Alkaline Manganese
- Silver Oxide
- Zinc Carbon

The company utilises its own fleet of specialised vehicles dedicated to the nation-wide collection of waste batteries. Certain types of waste batteries are environmentally-hazardous, due to their chemistry, and must be handled, stored, and transported in an approved manner that is regulated by authorities such as the Environment Agency, SEPA, VOSA and the HSE.



### 3. Electric Vehicle batteries - collection – sorting – disassembly - testing/diagnostics – export – shredding -recycling

Ecobat Logistics is the largest nation-wide collector of waste electric vehicle batteries in the UK. The company is fully-licensed to handle all electric vehicle batteries that are Lithium Ion.

The company utilises its own fleet of specialised vehicles dedicated to the nation-wide collection of waste batteries.





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The batteries are classed as non-hazardous waste, however, are dangerous goods and are therefore carried on our vehicles in compliance with ADR & HSE.

Currently electric vehicle batteries are collected, returned to site where initial safety checks are completed. Following passing of the safety checks the batteries are disassembled to module level, where they are tested / discharged. The modules are then **shredded and recycled.**

Moving forward the business plan is to categorise the modules in to waste and ready for re-use. Re-use can then be sold back to market. **Waste modules can also be shredded on site and the resulting material recycled and sold back to the market for reuse.**

Central to Ecobat Logistics service offering is its nationally-deployed bin service for the safe and proper containment of waste batteries whilst in storage and transit. Specially-designed battery-banks that have been tested and approved to a UN standard can be provided on customers' sites, such as retailers, supermarkets and schools, etc. and when full, will be removed by Ecobat Logistics and an empty one left in its place. This is recognised as the most efficient way to store, transport and handle waste batteries that meets or exceeds the waste producer's and Carrier's duty of care obligations.


The Lead-acid batteries that we recover will ultimately be fully-recycled, using the best available techniques; the lead plates being sent to a group company for smelting to lead ingots for reuse, the poly-propylene cases recovered for remanufacture in the 'plastics' industry and the waste acid neutralised prior to disposal.

Non-lead acid waste batteries, some of which (chemistry) types of are classed as hazardous, arise in households and offices as well as factories and workshops. 'Producer responsibility' and 'take-back' schemes and obligations encourage greater recovery rates of spent batteries and new recycling options are being researched and developed constantly.

**The EV Batteries that we dismantle, discharge and shred will be ultimately fully recycled using Best Available Techniques with the shredded black mass sorted into the different chemistries and sold back to the market for reuse.**

Ecobat Logistics remains at the forefront of the drive to develop and practice environmentally-sound recycling methods and incorporating these in its fully-licensed nation-wide collection and recycling service.



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## The context of our business

Whilst evaluating the business to establish its scope and context, we have considered its

- culture
- objectives and goals
- complexity of services and activities
- flow of processes and information, both internally and externally
- size and ability to exert influence on control on its markets and customers

We have also determined how external interested parties may influence our business and how this reflects on our management systems.

The internal context of our business is the environment in which we aim to achieve our objectives. This includes our approach to governance, the strategic direction of the business, the capabilities of our people and the relationships we have with our customers and all interested parties. In addition, we have considered the culture, values, and principles inside the company, together with its processes and structure.

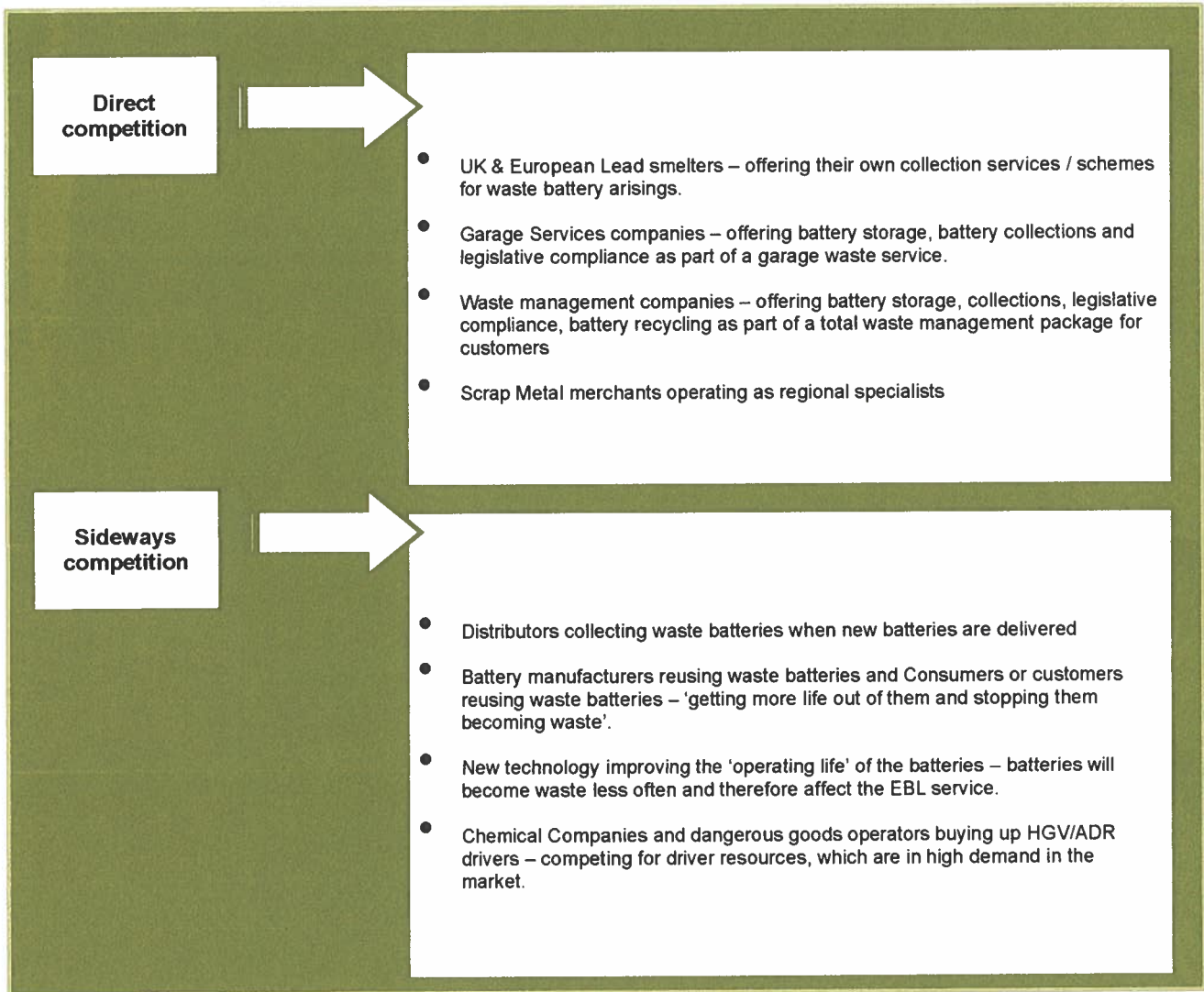
The external context of our business includes issues arising from the social, technological, environmental, ethical, political, legal, and economic environment in which it operates. These include the introduction of new, or the amendment of environmental legislation, be it international, national, regional or local; technological improvements, economic shifts in our market, competitor activity, and any event having a potential to affect our corporate image.



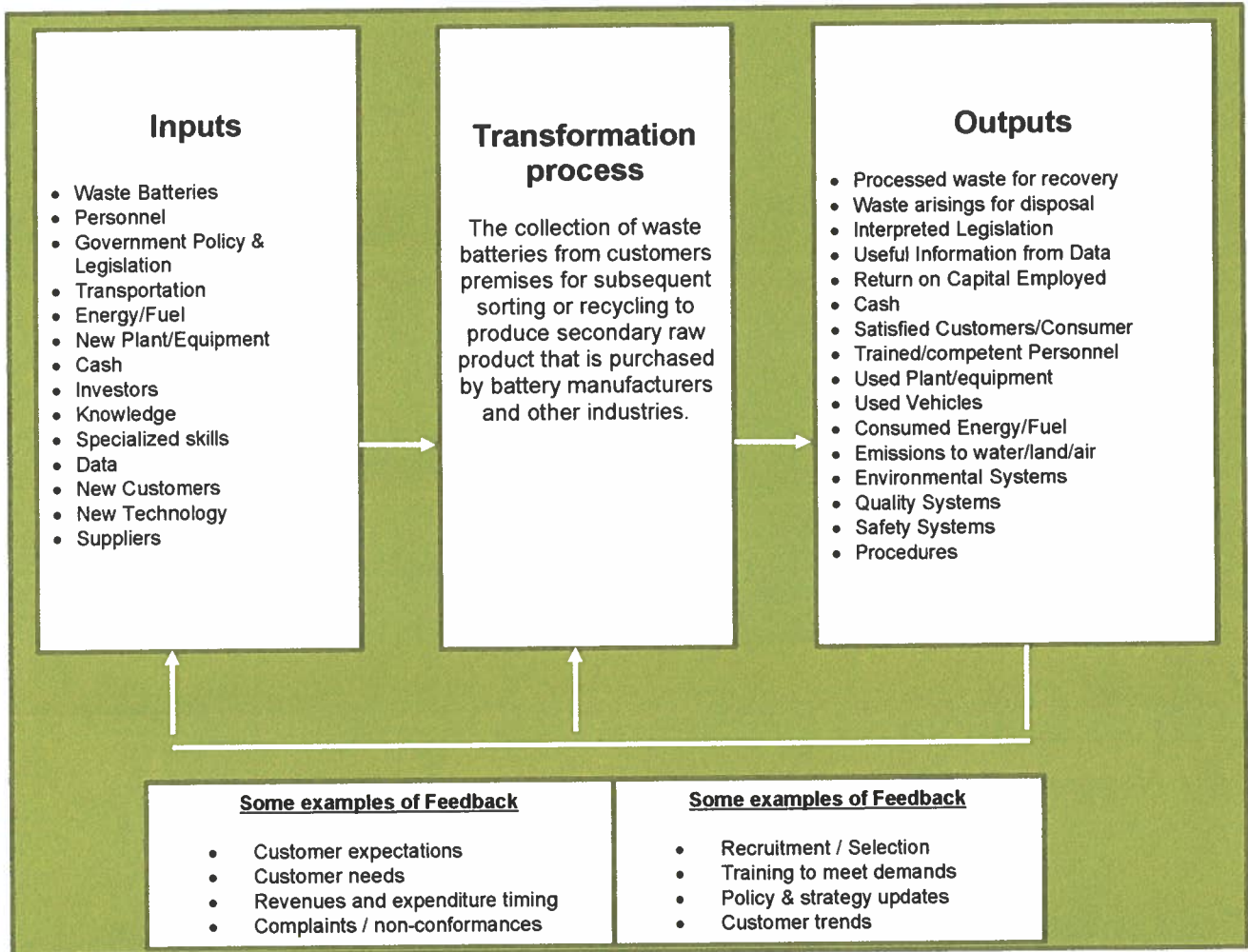




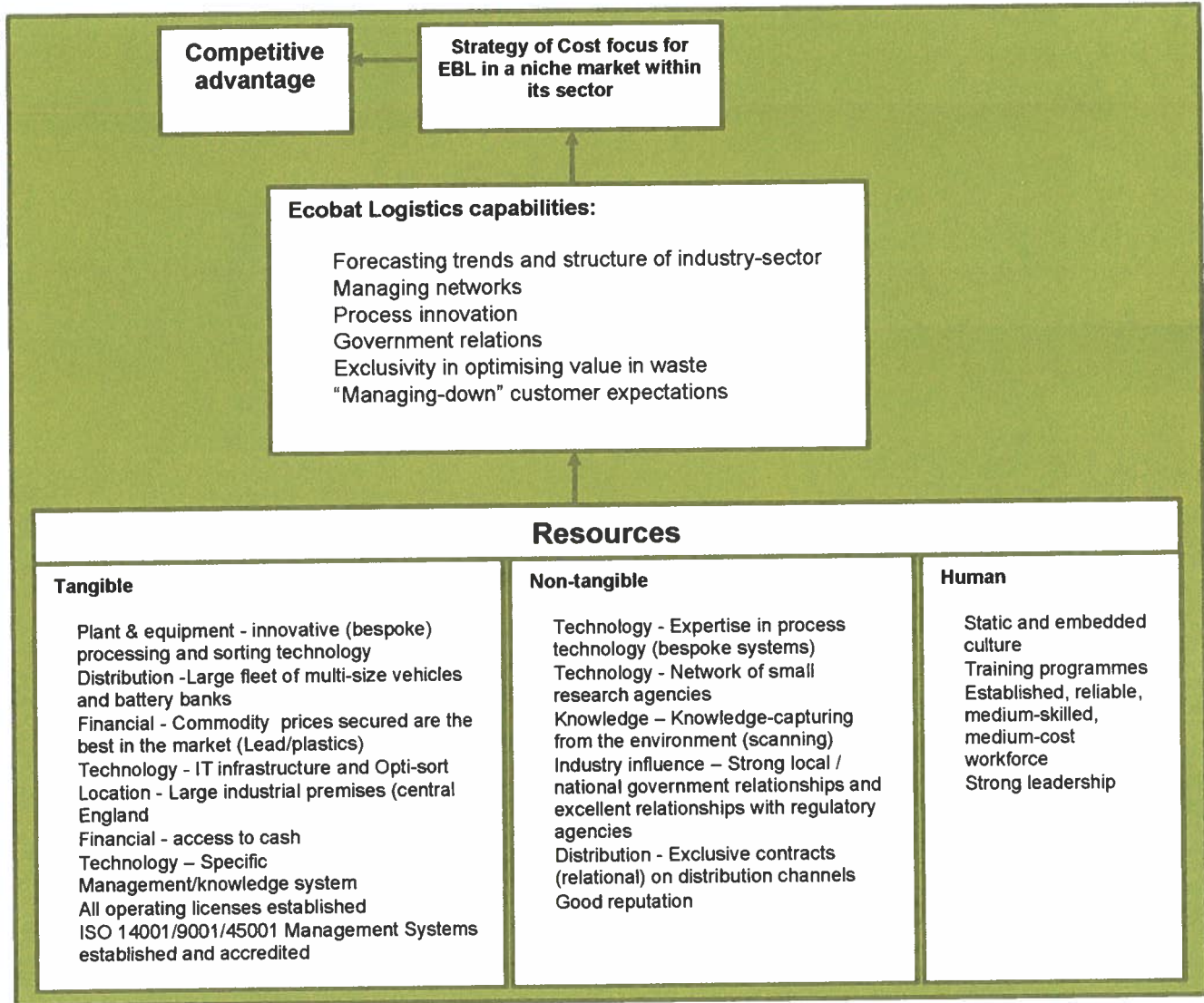
**The industry sector and market that we operate in**



**The process flows within our business**



**Our resources**





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### Certifications, Accreditations and Trade Association affiliations

The Company holds the following accreditations:

Accreditation / Certification	Certificate Ref.	Accreditation Body
ISO 9001:2008	GB14/90827	SGS Ltd
ISO 14001:2015	GB14/90757	SGS Ltd
ISO 45001:2018	GB11/83921	SGS Ltd
CHAS 2017	19 <sup>th</sup> September 2021	SSIP



The Company holds the following Trade association memberships:

Trade association	Membership No.	Joining date
Freight Transport Association	30728	September 1994

*End of Section One*





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**Section TWO Common Management System Controls to ISO14001:2015, ISO 9001:2015 & ISO45001:2018**

The ISO 14001 and ISO 9001 standards were substantially revised in 2015, followed by ISO 45001 being introduced in 2018, resulting in a similarity in their structure and a commonality of certain sections.

This part of our business manual covers those sections that apply equally to the ISO 14001 (Environmental), ISO 9001 (Quality) and ISO 45001 (Safety) Management Systems employed by our company; namely:

- Documentation and Control of Documents
- Control of Records
- Competence, Training and Awareness
- Internal audit
- Communications
- Performance Evaluation
- Management review
- Improvement
- Risk and Opportunities

**Documentation and Control of Documents**

Documents, in this context, are forms, records, procedures and written instructions that are critical to the company’s environmental, safety and quality management systems. They can exist in hard (printed on paper) copy or electronic (soft) format. When documents such as these are administered so as to prevent them being altered, issued or used by an unauthorised person, they are said to be Controlled documents.

To this end, every company environmental, safety and quality system-critical document in Controlled status must bear on it, as a minimum:

- a title
- a unique identifier (reference number or form number, etc)
- a revision number

The latest version of each Controlled document has been uploaded in the Compliance area on the company’s P drive by the Compliance Dept and also listed on the Documents and Records Register (Ref. QM10)

Blank (template) Controlled documents that are completed by hand are saved in pdf format in the ‘Compliance’ folder on the server P drive and should be printed off only in the quantity required at the time. In this way, should it become necessary to alter a document, the risk of continuing to use the previous version, or being left with a stock of obsolete forms, will be reduced or eliminated.

The Compliance Dept will advise all relevant departments in the event of a Controlled document being modified, or a new one being created and issued for the first time.

When a form, record, procedure or written instruction is withdrawn from use, the electronic Master copy will be transferred from the Compliance area to the ‘OBSOLETE DOCS’ folder on the P drive that is managed by the Compliance Dept. Any other copies that were previously loaded on individual’s computer P drives must be deleted.

Refer to Process flow chart, Ref QM11 “Document control” for further details

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## Communication

We have an established procedure to encourage the timely delivery of transparent, effective, accurate and traceable non-confidential information and data between company employees and departments.

This procedure also applies to communications with external parties, including customers, contractors, suppliers, service providers and regulatory bodies; and their communications with us; when it is particularly important that they are dealt with by an appropriate member of staff in a polite, professional and in a timely manner.

This procedure is also applicable to incoming and outgoing communications generated by all our management systems.

The company's compliance obligations were taken into account when we established our communication process and all the environmental information that we communicate must be reliable and been generated under the governance of our management systems.

The procedure for internal and external communications is documented in QM44 corporate communications & legislation that is available in the Compliance area on the 'P' drive for reference.

## Control of Records

Records, in the context of Environmental, Safety and Quality Management Systems, are defined as facts, results, evidence, etc. that are set down for preservation in writing or some other permanent form. Examples in our case include records of observations made during inspections and audits, test results, KPI's and waste transfer notes.

It is vital that records critical to our environmental and quality management systems are retained securely on the premises, whilst being accessible for future reference by authorised employees and (if necessary) the regulatory authorities.

Advances in e-mail and IT systems, together with the widespread availability of word processing / spreadsheet / publishing software for general everyday use, has encouraged the creation of 'electronic' documents and their transmission on a phenomenal scale, to the extent that they are rapidly replacing traditional paper-based reports, forms and certificates. Nonetheless, any electronic document that the company has defined as a record will be treated in the same manner as a paper-based one and controls will be administered to ensure their safekeeping.

The Compliance Dept maintains a Documents and Records Register (Ref QM10) that lists all the company's environmental, safety and quality-critical forms and records, in both paper and electronic (e.g. Word and Excel) format. It also states the minimum length of time they must be retained for company or regulatory purposes.

Registers and lists that are created and maintained in electronic- format are regarded as 'live documents' and will be identified as 'perpetual', with a 'P' in the retention time column of this register.

A pdf version of this register can be viewed in the Compliance folder on the P drive.

## Management Review

The Leadership Team, together with representatives of the Compliance Department will meet periodically and carry out a high-level review of the company's environmental and quality management system's performance.

Whilst the ISO standards have established an Agenda that lists the critical areas of the 14001, 45001 and 9001 Management Systems to be reviewed, there is no requirement to carry out a complete system review against this Agenda in a single Management Review session. Consequently, we have decided that a quarterly review of at least one quarter of the Agendas of our Quality, Safety and Environmental Management Systems, is a more effective and pragmatic approach to Management Review in our case.





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## Competence, Training and Awareness

The company's competency requirements apply to anyone under its control whose actions could influence or affect its quality and environmental performance. They include those whose activities have a potential to cause a significant environmental impact, together with those with responsibilities for the Environmental, Safety and Quality Management systems, including:

- identifying and quantifying the company's significant environmental aspects and impacts
- contributing towards the achievement of any company environmental or quality objective / improvement
- responding to emergency situations
- performing internal audits
- delivering in-house training
- assessing the company's compliance with legal and international standard obligations

The company is committed to ensuring that the people it employs (directly and indirectly) whose activities could make a significant environmental, safety or quality impact are adequately and appropriately trained to be competent. This will be achieved by recruiting or hiring persons having had already acquired the necessary competence/s; or by training existing staff to the required standard for the task or activity they are carrying out.

### Internal audit

We have established an internal audit programme and frequently assess the company's controls and processes that fall within the scope of our ISO 14001:2015, ISO45001:2018 and ISO 9001:2015 Environmental, Safety and Quality Management Systems.

Internal Auditors are selected on the basis of their independence of the activity being assessed to ensure there is no conflict of interest, and that their findings (whether positive or negative) remain free from bias. Nonconformities that are identified and recorded during an internal audit will require correction.

The Auditor and Manager (or an authorised representative of the Manager) of the department being audited must agree a corrective action that is appropriate and sufficient to remedy each non-conformity that has been identified and recorded. In addition, the root-cause of the failure / deficiency must also be ascertained, so as to enable improvements to be determined that will reduce or negate the possibility of a recurrence. The effectiveness of improvement and corrective actions will be assessed during subsequent audits.

Refer to Process flow chart QM13.

### Monitoring and Measurement

We have determined and provided the resources that are required to ensure that the results we obtain when carrying out monitoring or measuring activities will be valid and reliable.

Monitoring and measuring equipment will be

- suitable for the specific type of monitoring and measurement activities being undertaken
- maintained to ensure continuing fitness for purpose
- calibrated or verified, or both, at specified intervals, or prior to use, against measurement standards
- traceable to international or national measurement standards where such standards exist
- identified in order to determine their status
- safeguarded from unauthorised adjustments, damage or deterioration that would invalidate the calibration status and any subsequent measurement results.

## Determining the scope of the Environmental, Quality & Safety Management System

After considering our legal compliance obligations, context of our business, our resources, capabilities, activities, departments, physical boundaries, and the needs of our interested parties and the level to which we can control and influence them, Ecobat Logistics has determined that its scope as:

- Bin placement and collection services for obsolete and waste batteries
- Diagnostics, Disassembly, Re-engineering, and Reclamation of materials from obsolete and waste batteries and associated equipment
- SSIP Classification SS5 (non-construction)

This scope applies to its activities at the following locations (only):

Site	Activity
Crescent Works Estate, Darlaston, Wednesbury	Administration offices
Unit Nos 2, 3, 4; Crescent Works Estate, Darlaston, Wednesbury	Transfer, Sorting and Treatment bays
Unit No 5, Crescent Works Estate, Darlaston, Wednesbury	Transfer, Sorting, Disassembly of Electric Vehicle Batteries
<b>Unit No 4, Crescent Works Estate, Darlaston, Wednesbury</b>	<b>Shredding of Electric Vehicle Battery cells for recycling</b>

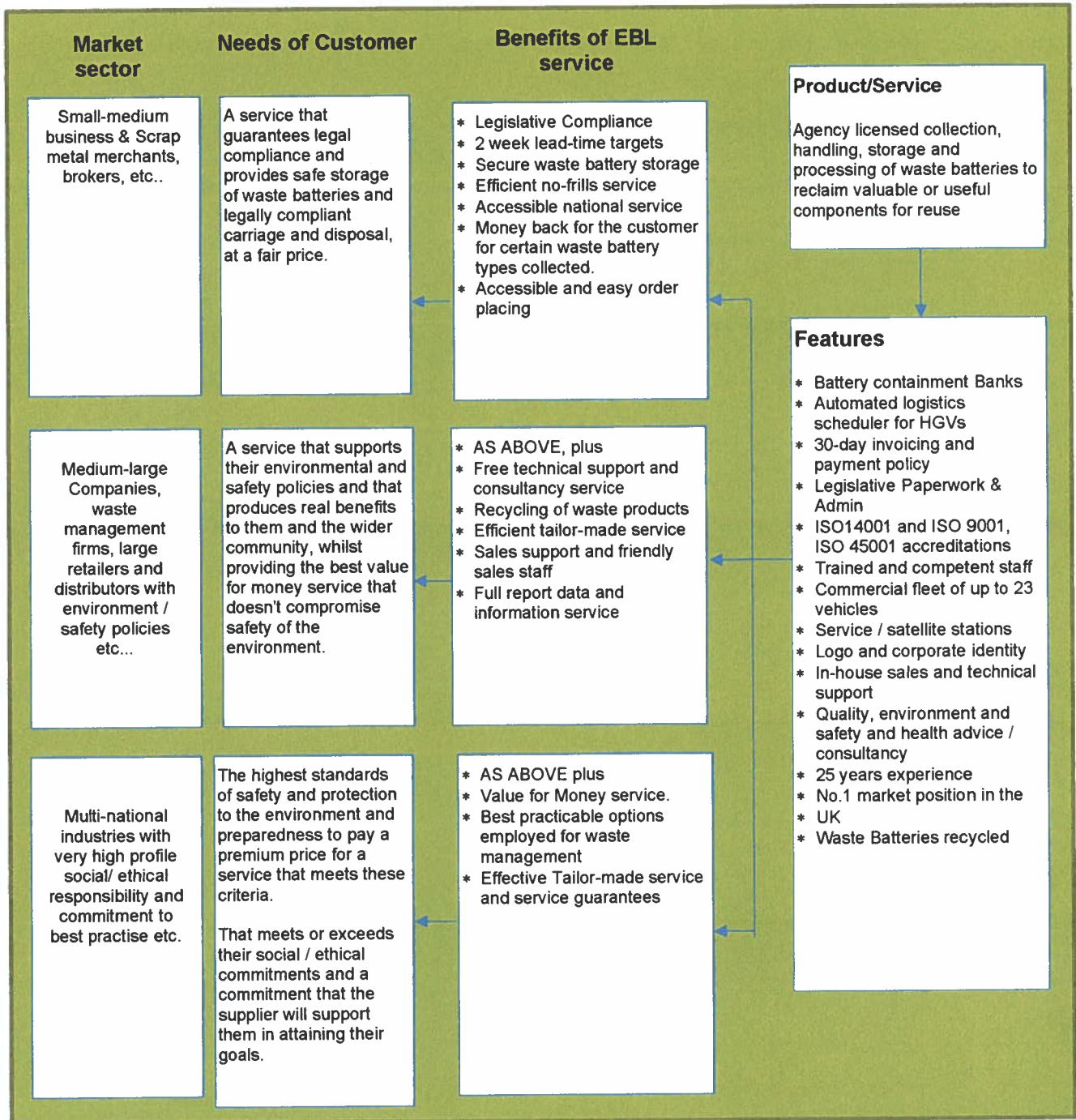
*This IMS does not cover the below sites (due to being storage units only):*

*Unit 8, Crescent Works Ind Park, Wednesbury, WS10 8JR*

*Unit 9 & 10 Cala Trading Estate, Bristol, BS3 2HA*

*Unit 23 Baillieston Trading Estate, Glasgow G69 6UL*

**How we perceive the needs and expectations of our interested parties**





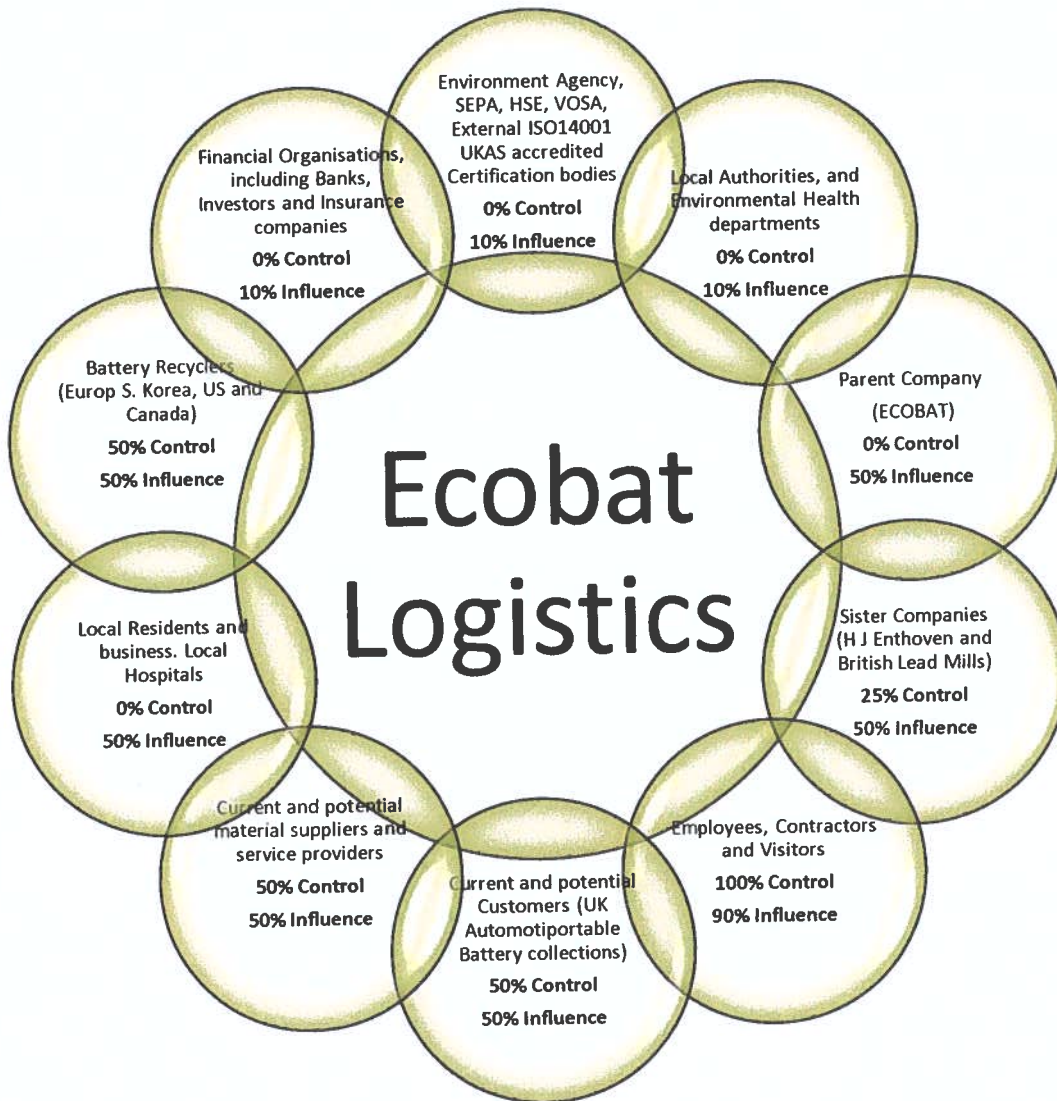
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**Our interested parties - concerning the business’s environmental, quality and safety interests**

We have identified the business’s interested parties and they are illustrated below.

Their relevant needs and expectations were taken into account when we compiled our Legal Compliance Register and carried out the Environmental Aspects and Impacts assessment for the business.



Our determination of the extent to which we exert control and influence over our Interested Parties is shown above.

**Control**, in this context, is defined as jurisdiction, sway, power, authority, command, domination, leadership, predominance.

**Influence**, in this context, is defined as the act or power of producing an effect without the apparent exertion of force or direct exercise of command.

The needs and expectations of our interested parties are detailed in the table below:

<i>Interested Parties</i>	<i>Internal / External</i>	<i>Needs and Expectation</i>	<i>Compliance Obligation</i>
<i>Environment Agency</i>	<i>External</i>	<i>Compliance – follow relevant legislation and report on time if applicable. Pay permit rates within timely manner</i>	✓
<i>Contractors</i>	<i>External</i>	<i>Ensure prompt payment, no health and safety implications, good working relationship</i>	
<i>Customers</i>	<i>External</i>	<i>Deliver service in agreed timeframe and to correct specification, provide value for money, good communication and quick response.</i>	✓
<i>Local Authorities</i>	<i>External</i>	<i>Compliance – follow relevant legislation and report on time if applicable</i>	✓
<i>Local Hospitals</i>	<i>External</i>	<i>Take all reasonable precautions to protect the company from incidents in line with those operations. Inform immediately of any emergency situations on site, for expected casualties</i>	
<i>HSE</i>	<i>External</i>	<i>Compliance – Follow relevant legislation and report on time if applicable.</i>	✓
<i>Parent Company (EcoBat)</i>	<i>Internal</i>	<i>Good financial performance. Communication, Cooperation, Competence. Ensure deadlines are met.</i>	
<i>Sister Companies (HJE &amp; BLM)</i>	<i>Internal</i>	<i>Good financial performance. Communication, Cooperation, Competence. Ensure deadlines are met. Good Quality goods delivered to HJE</i>	
<i>Shareholders</i>	<i>Internal &amp; External</i>	<i>Good financial performance with a return on their investment, compliance with the legal and other obligations that may be applicable.</i>	
<i>Employees</i>	<i>Internal</i>	<i>Communication, Cooperation, Competence, Training/professional development, Supervision, Support, adequate facilities and services, work/life balance, employment security, prompt payment</i>	✓
<i>Scottish Environmental Protection Agency (SEPA)</i>	<i>External</i>	<i>Compliance – follow relevant legislation and report on time if applicable</i>	✓
<i>Local community</i>	<i>External</i>	<i>Communication, consideration to the neighbourhood when planning any changes to the company's operations. No complaints relating to noise, parking, health &amp; safety, pollution and waste</i>	
<i>Suppliers</i>	<i>External</i>	<i>Make prompt payment for the service, ensure that there are no health and safety implications, ensure that a good working relationship exists</i>	
<i>Battery Recyclers</i>	<i>External</i>	<i>Accuracy of sorted material, prompt shipments and communication</i>	
<i>Trade Associations</i>	<i>External</i>	<i>Comply with any particular membership requirements</i>	✓
<i>Insurance</i>	<i>External</i>	<i>Make no or little claims, maintain prompt payment, have in place effective risk management and mitigation</i>	✓
<i>Employee Safety Representatives</i>	<i>Internal</i>	<i>Staff health and safety, communication, cooperation, pay and working conditions, training</i>	✓
<i>Financial Organisations (banks)</i>	<i>External</i>	<i>Honour any financial commitments that the company has in line with the applicable compliance requirements.</i>	
<i>Emergency Services</i>	<i>External</i>	<i>Take all reasonable precautions to protect the company from incidents in line with those operations.</i>	
<i>Visitors</i>	<i>External</i>	<i>Safe and secure environment. Knowledge and competent workforce with good communication. Demonstration of working practices including quality.</i>	✓



## Performance evaluation

### Monitoring, measurement, analysis and evaluation

We define Performance evaluation as measuring, monitoring and determining the extent of performance.

To undertake performance evaluation, it has been necessary to first establish a base line for our monitoring and measurement capability, by:

- devising, introducing and maintaining procedures for monitoring and measuring any operational activity that could produce a significant impact on the environment
- using calibrated or verified environmental monitoring and measuring equipment
- maintaining the calibration of the environmental monitoring and measuring equipment
- keeping a record of the environmental monitoring and measuring activities

Our Environmental, Quality & Safety Policy and associated procedures are monitored on an ongoing basis and will be updated in response to any changes in the company's activities or arrangements.

Improvements to the integrated management systems can also be a result of learning experiences and review processes.

### Evaluating the extent of our compliance

Measuring, testing and analysing our processes and activities are important ways of determining the level of our compliance with legislation and standards; and our rate of progress towards achieving our Objectives for improvement.

Evaluation exercises such as these also assist us in our decision-making and underpin our continual improvement ethos.

The business areas, processes and activities that we measure include:



- collection service levels
- transport fleet environmental impacts
- customer satisfaction
- legal Health and Safety and Environmental compliance obligations
- Protocol sampling

To this end, we have set Key Performance Indicators (KPI's) as targets for selected activities and processes and publish our achievement of these on a monthly basis.

### General

The company employs numerous stand-alone and IT-based systems that provide effective and efficient support for management of the business:

<i>System type</i>	<i>Typical System features</i>	<i>Applicable Standard</i>
Occupational Health and Safety Management System	Risk Assessments, manual handling; Fire Risk assessments; Health & Safety Auditing; Permits to work; Contractor control; Vehicle & equipment maintenance; PPE & RPE use; COSHH Assessments; Emergency Response Plan, <b>DSEAR Assessment</b>	ISO 45001:2018
Environmental Management System	Environmental control measures; Environmental Aspect and Impact assessment; Internal auditing; Objectives; Improvement projects; Environmental reports; Legislation Register; Legal compliance; Management review.	ISO 14001:2015

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Quality Management System	Documentation and Records control; Internal auditing; Management review; Competence, Training and Awareness; Quality objectives; Improvement.	ISO 9001:2015
Fire Safety Management System	Risk Assessments – Fire Risk Assessments;- all high & medium Risk Areas (by Zone) and / or activity; Fire Safety Auditing; Permits to work; (Hot Work) Contractor control; Vehicle & equipment maintenance; PPE & RPE use; COSHH Assessments; <b>DSEAR Assessment</b> , Emergency Plan.	Within scope ISO45001:2018
Purchasing Database	Approved Suppliers; Purchase records; Purchase authority	Within scope ISO 9001:2015
David.NET	Customer records; Site records; Collection records; Bin location tracker; Quotes tracker	Within scope ISO 9001:2015

### Improvement

Opportunities to improve an area or activity that falls within the scope of the business's environmental, safety or quality management system can be identified from results arising from

- Aspects assessments
- internally or externally-performed audits on our activities
- non-conformance reports
- inspection records
- outcomes from Management Review meetings

The business is committed to continual improvement and uses assessment methods and criteria from its management systems, such as those listed above, to set objectives that will enhance its environmental and quality performance; as well as act as a preventative tool.

Refer to Process flow chart QM22

The Leadership Team is committed to implementing whatever preventative measures are necessary to stop operational problems recurring; manage its significant environmental aspects and remain compliant with legislation.

This can be achieved by collating information and data from business areas and processes such as:

- Contract review
- Environmental Management System
- Fire Safety Management System
- Internal EMS, QMS and SMS Audits
- Employee suggestions and comments
- Customer suggestions and comments
- Monitoring KPI's and business performance (P & L/Budget figures)
- Market reports and economic reports
- New technology, or alternative methods / materials
- Management meetings
- Process capability and personnel training
- Customer satisfaction trends
- HSEQ Objectives measurement

This data and information can also contribute towards identifying opportunities for improvement.

### Incident, Nonconformity & Corrective action

We will take appropriate action to eliminate the cause/s of an identified non-conformance and prevent its recurrence; and have documented procedures covering:

- the review of nonconformities (including customer complaints)
- establishing the root cause/s of non-conformance/s
- assessing what action is needed to prevent recurrence
- taking the action required
- recording the results of the action
- reviewing the effectiveness of the actions

Our corrective action procedure extends to our suppliers, contractors and vendors, as well as data and materiel received; and comments from customers.

By following procedure Non-conformity and Corrective Action Control QM22, we will:

- examine the cause of the non-conformity of material, service or environmental issue
- devise and implement a suitable corrective action to prevent a recurrence
- analyse trends in processes or performance of work to prevent future non-conformities
- analyse data, product and service (by direct observation) to determine the extent and cause

By following procedure Accident & Incident Investigation Process SM13, we will:

- Categorise the accident / incident
- Allocate appropriate response action and time scaled
- Complete appropriate report, including reporting to interested parties (HSE etc.) where applicable
- Complete the identified level of investigation
- Follow the relevant record, feedback, improvement and monitoring processes
- Share and learn from the event

### Continual Improvement



We have set targets and objectives at both Corporate and Departmental level that are designed to stretch the organisation and set benchmarks for establishing a mindset of continual improvement amongst the workforce.

The organisation seeks to continually review and raise its targets in keeping with the company's progression and in consideration of the wider Health and Safety and environmental effects.

Some of the activities within the scope of the Environmental Management System that contribute to the continual improvement programme of the company include:

- Quality, Health & Safety and Environment Policies
- HSEQ objectives
- Results of internal and external surveillance audits
- Analysis of data
- Corrective and preventive actions
- Management review and other communications/information processes



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### Addressing risks and opportunities

Whilst determining the context of our business, we considered the needs and expectations of the company's interested parties', its significant environmental aspects and impacts, its obligations with regard to legal compliance and in doing so, we identified the risks to the business and opportunities for improvement.

As a result, we have set Objectives (for improvement) that we will monitor and manage, to ensure that the intended outcomes are achieved, and we enhance desirable effects, whilst at the same time prevent or reduce any undesired environmental effects resulting from our activities and processes, and prevent or reduce any deficiencies in the quality of our services, activities or processes and reduce and control health and safety risks and hazards to low as reasonably practicable.

To ensure we are prepared for any emergency situations or unscheduled events that may arise, we will



- identify the business's environmental aspects and act on, or manage, those that we consider to be significant
- identify the hazards and risk within our business for our interested parties etc, implanting control measure to reduce the risk
- identify all the current, emerging and amended environmental legislation that governs our activities
- set improvement objectives with targets and suitable programmes by which to achieve them
- identify emerging threats from, or changes in, the company's environmental aspects or risk register

In order to address these risks and opportunities, we will:

- integrate and implement these actions within the management systems
- identify any emerging legislation or directives that could impact on our battery recovery capability or arrangements
- closely monitor national / international commercial / political developments that could affect battery Compliance Schemes and exert what influence and control that we can, to bring about the best possible outcome from potentially adverse situations
- set improvement objectives with targets and suitable programmes by which to achieve them
- monitor existing and emerging industry competitor activity
- research into 'repurposing' large lithium batteries from electric cars, that are currently a significant disposal problem
- manage our foreign recyclers and maintain close and mutually-beneficial relationships with them





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## Compliance Obligations

The industrial business sector in which we work, and the nature of things that we do, places us under the governance of a bewildering amount of legislation - for environmental protection as well as our Health and Safety. This has prompted us to identify the UK and EU environmental legislation that is directly or indirectly relevant to the environmental aspects of our processes and activities and determine to what extent the compliance obligations apply to our business.

A Legal Compliance Register has been drawn up that lists all of our company's compliance obligations that are directly or indirectly relevant, or for information purposes only. Legislation that may impact the business in the future, or that could be of concern to our interested parties has also been identified.

The key obligations placed on the business by each piece of relevant environmental and health & safety legislation, together with a brief summary of the actions we have taken to ensure that compliance with them is achieved, is listed in this register for management information purposes. This register will be referred to when carrying out an annual Legal Compliance audit on the business.

The current primary source of information is Legislation Updating Service (Newground). Other data sources include trade publications, government websites, industry consultants and regulatory bodies, such as the Environment Agency and the HSE.

The Compliance Department retains electronic copies of the relevant legislation on the P drive of the company's server, together with the Legal Compliance Register, for information purposes for the Leadership Team, as well as for departmental reference.

### Verifying Legal compliance

We have an established procedure to periodically evaluate the extent to which our processes and activities comply with relevant legal obligations and significant environmental aspects.

Legal compliance will be verified and validated by the Compliance Dept. during internal audits, inspections and observations; or in the event that employees, visitors or contractors raise concerns of a potential legal failing. These observations and reports will generate non-conformance reports that will be recorded on the Corrective Action Forms Register. Corrective or Improvement action will be assigned to the appropriate departmental head to implement.

In the event of relevant legislation being introduced or amended, or the withdrawal of legislation occurring, the Compliance Dept. will bring the relevant information to the attention of Leadership Team at the monthly management meeting - or immediately should the change be of a significant nature.

A full review of the legal registers is completed at least once per two years.

*End of Section Two*

**Section THREE Environmental Management system controls applicable to ISO14001:2015**

## Our Environmental Policy

We, the Leadership Team of H J Enthoven trading as Ecobat Logistics, hereon referred to as the Company, are committed to managing the company's environmental aspects to the highest possible standard; whilst maintaining its position at the forefront of our industry sector. All its employees and contractors have duties and responsibilities related to this Policy, and we will regularly review the company's environmental performance to ensure they are being met.

We have identified the potential and actual impacts that our work-based activities can make on the environment and recognise that they can be minimised - and perhaps even eliminated - if we conduct our business in a responsible and sustainable manner. To this end, we are wholly committed to best environmental practice across all of the company's processes and activities, and will encourage our contractors, business partners and members of the wider community to play their part in this worthy effort.

In order to achieve this, we have

- established this Environmental Policy for which the Leadership Team has ultimate responsibility; and which forms part of the company's strategic business planning
- developed and taken ownership of a comprehensive Environmental Management System, based on ISO 14001:2015 to underpin the company's compliance with all relevant Environmental Legislation, including Acts, Regulations, Codes of Practice and any other standards that are applicable to our business processes and activities
- made a commitment to take whatever actions are required to protect the environment and to prevent pollution.

We have considered the company's significant environmental aspects and impacts and have set objectives to establish a course for the continual improvement and enhancement of its environmental performance that will be monitored by regular checks and audits - measured against agreed Key Performance Indicators - and reviewed at Leadership meetings.

We have determined that these significant (both actual and potential) environmental impacts are linked to:

- energy use
- operational processes
- operational and residual waste produced during processes and activities
- heavy goods vehicle transport
- factory emissions to land, air and water.

and we will strive to ensure that the highest environmental standards are maintained in all company processes and activities, meeting, and if practicably possible, exceeding, the relevant legislative requirements by;

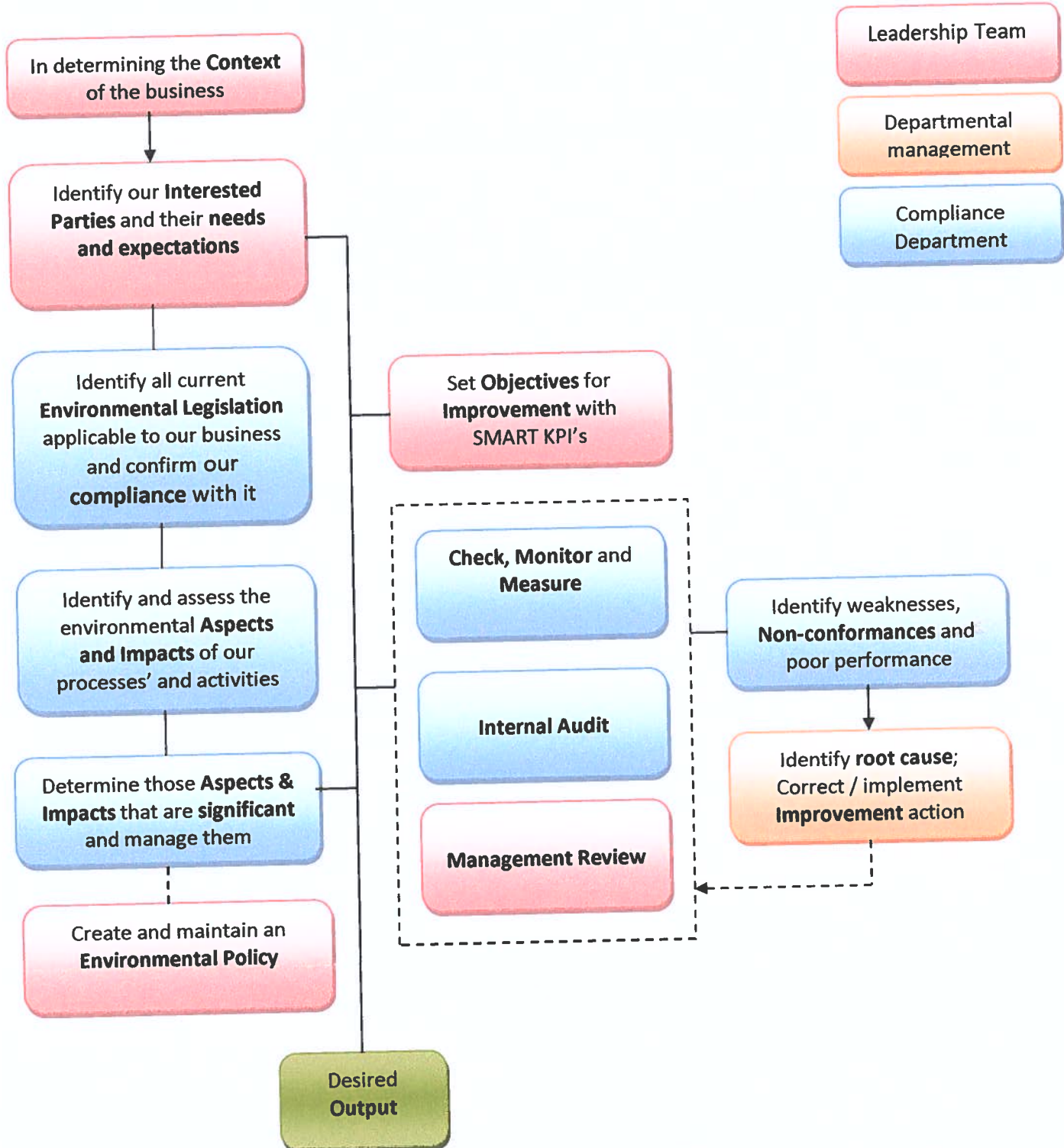
- continually assessing our processes and activities and identifying areas where we can minimise or eliminate their negative impacts on the environment
- minimising waste by the considerate and efficient use of materials and energy
- training employees and encouraging their participation in good environmental workplace practices
- developing and maintaining an environmentally-sound heavy goods vehicle logistics strategy
- minimising or eliminating exposure to risks from environmental or health and safety hazards to employees and others in the vicinity from our processes and activities
- taking a proactive approach when developing solutions for potential environmental issues
- considering environmental and ethical aspects when making investment decisions for the business.



Our Environmental Management System has been designed to address all the key environmental issues related to the company's processes and activities, both on and off site and it will be continually assessed for its effectiveness by the Leadership Team, as endorsed below, and we encourage you all to uphold the principles of this policy.

*This Environmental Policy has been endorsed by all members of the Leadership team and communicated to the workforce of EBL and its interested parties upon request*



**ISO 14001:2015 Environmental Management System Process flow  
 Management Responsibilities**



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## Planning

### Environmental Aspects and Impacts

We have assessed all of the company's activities and services from a life-cycle perspective (Ref EM13) and used a set methodology by which to determine the significance of their environmental aspects. (Refer to Method ref. EM10)

The degree of significance of each aspect has been assessed by way of a scoring system, based on the

- potential severity of the impact
- likelihood of the impact occurring
- severity during abnormal conditions or emergencies
- interested parties affected
- past occurrences or events
- positive environmental benefit (if any)

Those aspects that have been determined as being significant are listed separately (refer to the Significant Environmental Aspects and Impacts Summary ref. EF16) and have been communicated to the relevant Departmental Heads and operational employees.

Environmental aspects are reviewed periodically (at least annually) but will be immediately reassessed in the event of:

- new environmental legislation (whether more or less stringent)
- repealed or withdrawn environmental legislation
- advances in technology
- a modification or wholesale change to an activity
- an additional process step or service offering
- an abnormal operating or environmental condition occurring or threatening to occur
- a reasonably foreseeable emergency situation

and as a result of this reassessment, we will determine whether the aspect remains significant.

**Note:** Significant Aspects, if adequately managed, will not necessarily be considered as Objectives for improvement.

### Environmental objectives and planning to achieve them

#### Environmental Objectives

Having taken into account our significant environmental aspects and associated compliance obligations, and considered the risks and opportunities to the business, we have established some environmental objectives for improvement.



These objectives are consistent with our Environmental Policy and are measurable and monitored against Key Performance Indicators and regularly communicated throughout the business.

#### Planning actions to achieve environmental objectives

Some of our specific targets and objectives are of a constantly evolving nature and in these cases, we have to take a dynamic approach when considering what actions to take in order to achieve them. The company currently has a number of specific targets and objectives that are linked primarily to commercial, environmental, safety and employee welfare issues; all of which are underpinned by a general drive to improve the business overall.

Specific targets and objectives of our Quality and Safety Management systems may be integrated with those from this Environmental Management system.

Many of our objectives will have a Health and safety, Environmental and Quality orientation, purely because of the nature of our business.

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The Objectives we set will be ‘SMART’, that is to say they will be

- S**pecific - well defined
- M**easurable - quantified and with a timescale
- A**chievable - credible and realistic
- R**elevant – useful and appropriate
- T**ime framed – realistic timescales for their implementation

We have produced a number of risk-based operating procedures and works Instructions (Methods) to provide guidance on most of our work activities, but especially those that have a potential to produce a significant environmental hazard or an undesirable outcome. These methods are available in pdf format on the ‘P’ drive, in the Compliance area. Employees with no access to a computer will be issued with hard copies as required.

Support for, and the continual improvement of our management systems is driven by the Leadership Team and others delegated by them; the key roles and responsibilities of which are defined in Section One of this manual.

## Operational Control

We have established operating criteria and controlled processes that enable us to identify opportunities, minimise risks and pursue our objectives for improvement.

To achieve effective planning and control from a life cycle perspective, the following principles are applied:

- Identifying operations and activities with significant environmental aspects
- Establishing procedures to manage and control activities and situations that could present significant environmental impacts
- Documenting, implementing and maintaining environmental operational control procedures
- Establishing procedures to control any significant environmental aspects associated with materials and services provided by our suppliers and contractors
- Implementing and maintaining environmental supplier and contractor control procedures

Operational procedures and policies that provide these controls can be accessed from the Compliance area on the P drive by staff and management.

## Emergency Preparedness and Response

We have established a management process to ensure that we are prepared and will be ready to respond adequately to emergency situations of an environmental nature. To this end, we will:

- consider the types and scale of emergency situations and accidents that could occur and assess the significance of their impact on the environment
- establish procedures to respond to actual emergency situations and accidents that could have an impact on the environment
- test the environmental emergency response procedures
- respond to actual environmental emergencies and accidents
- prevent or mitigate the adverse environmental impacts that emergencies and accidents can and do cause
- regularly review and revise, if necessary, the environmental emergency preparedness and response procedures, in line with legislative changes, or as a result of learning from the results of tests
- provide information and training on environmental emergency preparedness and response action to relevant parties and individuals.

The environmental emergencies that are most relevant to our business, which have been documented in our Environmental Aspects assessment are:

- Fire, including fugitive gases and contaminated water runoff
- Acid spillages and leachate from other battery chemistries
- Leaks of CO2 to air

- Diesel spillages both onsite and on the highway
- Road traffic incidents resulting in shedding of (possibly hazardous) load
- Escaping waste

The Operational procedures covering the above can be accessed from the Compliance area on the P drive by staff and management. These are:

Emergency Plan SM12

Control of Spillages EM19

Environmental Incidents & Near Misses EM20

Waste Battery Pre-acceptance Process EP11

Waste Battery Acceptance & Sampling Process EP12



All Portable and Non-Lead Industrial Batteries QM17

Automotive Lead Batteries QM15

Industrial Lead Batteries QM16

Site Operations All Chemistries QM14

*End of Section Three*

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**Section Four Quality Management System controls applicable to ISO9001:2015**

**Justification for not including Design (ISO 9001:2015 8.3) in our Quality Management System**

The company justifies its claim to exclude clause 8.3 (Design) of the standard from its Quality Management System, on the grounds that it does not manufacture and sell goods or products, so therefore does not require a design function in the business. Its service provision is based on a standard sales processing and logistics operation that also requires no design input.

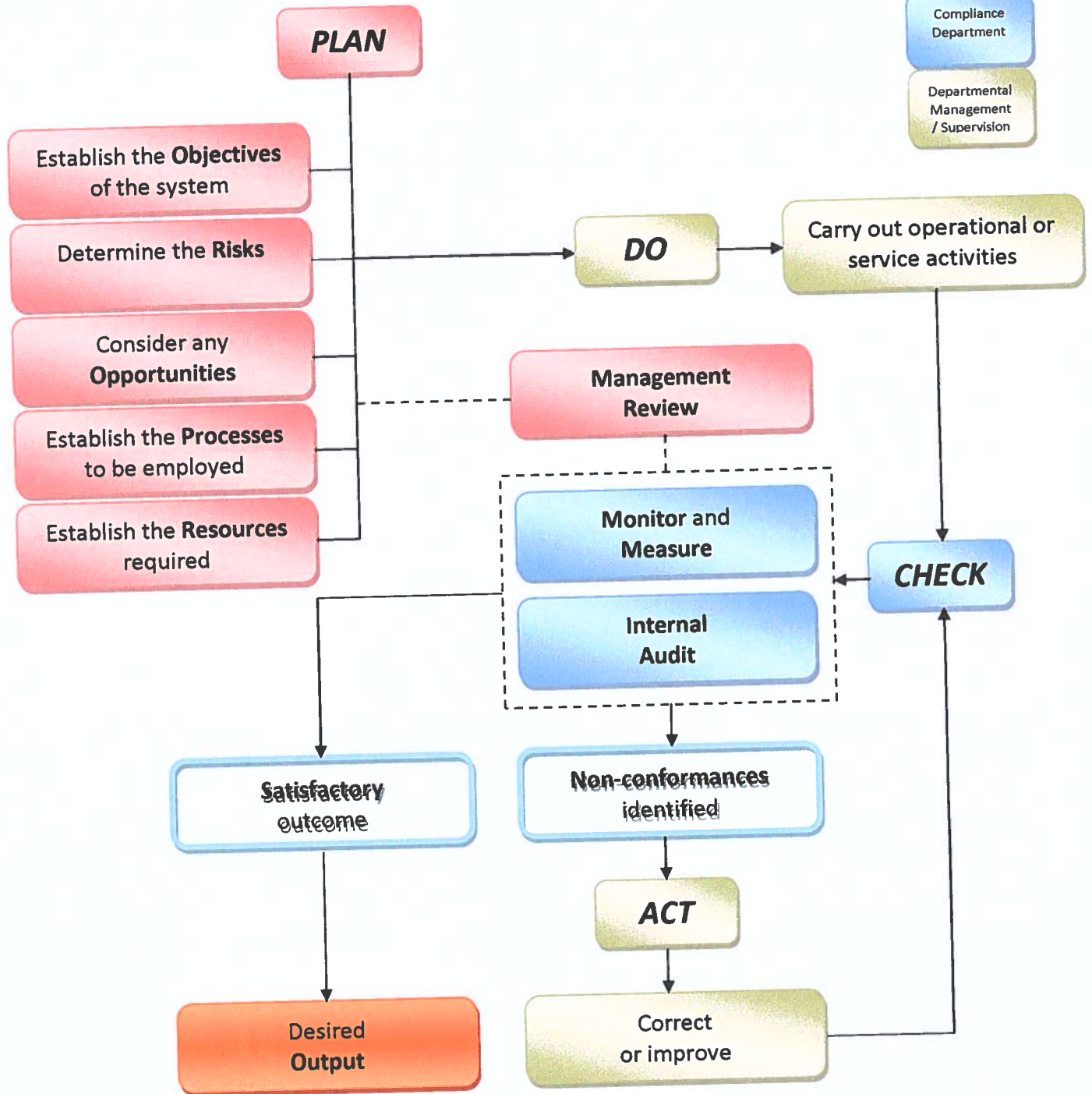




**ISO 9001:2015 Quality Management System Process flow  
 Management Responsibilities**

**KEY**

- Leadership Team
- Compliance Department
- Departmental Management / Supervision

Based on the PDCA model (Plan - Do - Check - Act)



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## Our Quality Policy

The continuing policy of H J Enthoven trading as Ecobat Logistics, hereon referred to as the Company, is to provide a high quality, professional and efficient service, to ensure that all the requirements of its clients are satisfied. This achievement will result in securing efficiency, a strong customer focus, enhancement of long-term sustainability and profitability within the business.

The Leadership Team will provide leadership and commitment and bear the responsibility for establishing, implementing, integrating and maintaining the principles of the Quality Management System in the company's day-to-day activities; and will ensure that sufficient resources are made available achieve these aims. It is also committed to ensure through communication, engagement, practical example and training, that Quality is a priority for everyone employed by the company.

Through direction and support, each employee will have an appreciation and understanding of the importance of the Quality Management System function; their responsibility to contribute to its effectiveness, and its direct relevance to the ongoing success of the business.

Employees and contractors have duties and responsibilities that are related to this policy and the company's quality performance will be reviewed regularly to ensure that these are being satisfied.

Our Quality Management System has been redesigned to promote continual improvement by setting Quality objectives in line with the framework laid down within the standard ISO 9001:2015 that will address the risks and opportunities within and external to the company.

The Leadership Team will meet on a regular basis to review



- the current level of resources available to the company, particularly those required for the continued and effective operation of its Quality Management System
- the company's progress in achieving its stated Quality Objectives and improvement plans
- reported Key Performance Indicators (KPI's) and to determine the necessary action required to address any shortfalls or under-performance
- non-conforming product or services, including Customer complaints;

and will strive to ensure that the highest quality standards are maintained in all company processes and activities, by,

- continually identifying areas for further improvement
- training employees and encouraging them to participate in good business practice and sound quality techniques
- taking a proactive approach and develop solutions for potential, as well as actual quality non-conformances
- considering continual improvement when making investment decisions for the business.

The Leadership Team will regularly assess the effectiveness of the Quality Management System and encourages their fellow employees to uphold the principles of this policy.

*This Quality Policy has been endorsed by all members of the Leadership team and communicated to the workforce of EBL and its interested parties upon request*

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## Quality objectives and planning to achieve them

### Quality Objectives

The Quality objectives we set are consistent with our Quality Policy, and are measurable and monitored against Key Performance Indicators. These will be regularly communicated throughout the business.

Some of our specific targets and objectives are of a constantly evolving nature and in these cases we have to take a dynamic approach when considering what actions to take in order to achieve them. The company currently has a number of specific targets and objectives that are linked primarily to commercial, environmental, safety and employee welfare issues; all of which are underpinned by a general drive towards an overall improvement of the business.

Many of our objectives will have a combined Health and safety, Environmental and Quality orientation, purely because of the nature of our business.

The Objectives we set will be 'SMART', that is to say they will be

- S**pecific - well defined
- M**easurable - quantified and with a timescale
- A**chievable - credible and realistic
- R**elevant – useful and appropriate
- T**ime framed – realistic timescales for their implementation

A Quality (Improvement) Objectives plan (Form QP10) has been drawn up, detailing (i) the Objective (ii) the resources required, (iii) how the results will be evaluated, (iv) who is responsible and (v) when it will be achieved. The plan is updated when an action point status changes or is completed. The Leadership Team will review the Objectives periodically; but certainly, no less frequently than at Management Review meetings.

We have produced a number of risk-based operating procedures and works Instructions (Methods) to provide guidance on most of our work activities, but especially those that have a potential to produce an undesirable outcome. These methods are available in pdf format on the 'P' drive, in the Compliance area. Employees with no access to a computer may be issued with hard copies as required.

Support for, and the continual improvement of our management systems is driven by the Leadership Team and others delegated by them; the key roles and responsibilities of which are defined in Section One of this manual.

### Complaints

A procedure has been established to deal with complaints regarding our service offerings that are raised by interested parties, which includes customers and suppliers.



The company places great emphasis on the importance of handling a complaint correctly - from its acknowledgement to its closure; treating the complainant with respect and achieving resolution in a timely manner, with the ultimate objective of restoring customer confidence.

Any action that is taken to correct a situation or event that has caused the complaint will be reviewed to gauge its effectiveness, until there is confidence that a recurrence of the cause is unlikely. This may bring about a requirement to increase surveillance in a particular area, or activity, by increasing the frequency of internal audits; but this will be decided between the Departmental Head and the Compliance Department.

All complaints will be logged and discussed at Management review meetings and subject to monthly KPI reporting. Refer to Process flow chart QM21 and Complaint form QF14.

Complaints are used to measure the company's Customer Satisfaction.

*End of Section Four*

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## Section Five Safety Management System controls applicable to ISO45001:2018

### Our Safety Policy

It is the policy of H J Enthoven T/A Ecobat Logistics, hereon referred to as *the Company*, to take all reasonable steps to ensure the health, safety and welfare of its employees. To do this, it will, so far as is reasonably practicable, establish procedures and systems necessary to implement, maintain and periodically review this policy.

The Company will ensure that all relevant statutory duties and obligations that relate to OH&S hazards are at least met, including those set out in the Health and Safety at Work etc. Act 1974. To achieve high standards of OH&S the company has implemented an Occupational Health and Safety Management System that meets the requirements of ISO 45001:2018. In addition, and as a commitment towards the continual improvement of Health and Safety management and performance, it has established a framework for setting and reviewing occupational Health and Safety objectives.

The Company will provide and maintain a healthy and safe working environment for all its employees and is committed to preventing occupational accidents and ill-health; and will strive to encourage behaviours and attitudes required to promote its *Safe for Life* culture throughout the business. All employees will be provided with sufficient equipment, information, instructions, training and supervision necessary to implement this policy and contribute towards the achievement of this key objective. The company is committed to eliminate hazards and reduce occupational health and safety risk so far as reasonably practicable.

Employees also have responsibilities regarding health and safety at work and it is their duty to take reasonable care of their own and other people's welfare and to report any situation that could pose a threat to the well-being of themselves or others; and be prepared to challenge unsafe behaviour. The company has established local reporting methods to this end that are available to all.

The Company also has a duty to protect the health and safety of visitors, Contractors and temporary workers whilst on its premises, as well as any members of the public who might be affected by its activities and operations.

The Company is committed to providing its employees with:

- safe systems of work
- consultation and participation during all health and safety matters
- reporting systems for safety-related matters
- safe plant and equipment
- safe means of handling, transporting, storing and disposing of articles and substances
- adequate training, instruction, information and supervision
- safe access and egress to and from workplaces
- a safe and healthy environment in which to work, with adequate welfare facilities

We will monitor and review our progress against the safety objectives that we have set, and our performance will be verified by periodic independent third-party audits.

The Leadership Team is totally committed to ensure the activities of Ecobat Logistics are conducted in accordance with this policy; and encourages you, your team and colleagues to support each other to uphold these principles. Only by working together and taking personal accountability can we achieve our goals.

*This Safety Policy has been endorsed by all members of the Leadership team and communicated to the workforce of EBL and its interested parties upon request*



## Consultation and participation of workers

The Leadership team are committed to worker participation and consultation, and ensure time and resources are made available for this to occur, removing obstacles/barriers to participate. A Health and Safety committee is established, who meet at least 4 times per year with no involved of the Leadership team to allow free speak and consultation. Leadership team ensure time is allocated and space allocated for the meetings to be held, compliance facilitate the meeting. Minutes are recorded and sent to all Leadership Team with feedback being given at regular intervals following the meetings. The Safety Committee is made up of workers from all areas of the business, including accounts, commercial, operations & logistics office workers, operators and drivers. Subjects discussed within the Safety Committee meeting include, needs and expectations of interested parties, health & safety objectives & policy, health and safety roles, responsibilities, accountabilities and authorities, legal requirements and how they are fulfilled, health & safety monitoring and how these are evaluated, internal audit programme, controls in place for contractors and procurement and continual improvement to the health & safety.

A number of other means of improving consultation & participation include:

- Safety suggestion boxes around site
- Regular tool box talks
- Performance reviews including H&S
- Near Miss / Suggestions incentivised
- Risk assessments completed along with workers in the area
- Regular H&S training & development
- Weekly newsletters including H&S matters

Consultation and participation are included for all contractors and associates.

## Hazard Identification

We proactively determine all sources, situations or acts (or combination of these) from the business activities, which may have the potential to harm in terms of injury or ill health, these include:

- Moving machinery / FLT's
- Working at height
- Lone working
- Manual handling
- PPE wearing

Different types of hazards in the business are considered, including:

- Physical (slips, trips, and falls, entanglement, noise, vibration, harmful energy sources)
- Chemical (inhalation, contact with or ingestion of chemicals, **gases**)
- Biological (contact with allergens or pathogens such as bacteria or viruses)
- Psychosocial (threat of violence, bullying or intimidation)

Refer to Hazard Identification and Risk Assessment Process SM24

## Safety Objectives

Having considered our significant residual risks and associated compliance obligations, and considered the risks and opportunities to the business, we have established some safety objectives for improvement.

These objectives are consistent with our Safety Policy and are measurable and monitored against Key Performance Indicators and regularly communicated throughout the business.





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### Planning actions to achieve safety objectives

Some of our specific targets and objectives are of a constantly evolving nature and in these cases, we have to take a dynamic approach when considering what actions to take in order to achieve them. The company currently has a number of specific targets and objectives that are linked primarily to commercial, environmental, safety and employee welfare issues; all of which are underpinned by a general drive to improve the business overall.

Specific targets and objectives of our Quality and Environmental Management systems may be integrated with those from this Safety Management system.

Many of our objectives will have a Health and safety, Environmental and Quality orientation, purely because of the nature of our business.

The Objectives we set will be 'SMART', that is to say they will be

- S**pecific - well defined
- M**easurable - quantified and with a timescale
- A**chievable - credible and realistic
- R**elevant – useful and appropriate
- T**ime framed – realistic timescales for their implementation

We have produced a number of risk-based operating procedures and works instructions (Methods) to provide guidance on most of our work activities, but especially those that have a potential to produce a significant environmental hazard or an undesirable outcome. These methods are available in pdf format on the 'P' drive, in the Compliance area. Employees with no access to a computer will be issued with hard copies as required.

Support for, and the continual improvement of our management systems is driven by the Leadership Team and others delegated by them; the key roles and responsibilities of which are defined in Section One of this manual.

### Emergency Preparedness and Response



We have established a management process to ensure that we are prepared and will be ready to respond adequately to emergency situations of a health & safety nature. To this end, we will:

- consider the types and scale of emergency situations and accidents that could occur and assess the risk these pose
- establish procedures to respond to actual emergency situations and accidents
- test the health and safety emergency response procedures
- respond to actual health and safety emergencies and accidents
- prevent or mitigate the adverse impacts that emergencies and accidents can and do cause
- regularly review and revise, if necessary, the health and safety emergency preparedness and response procedures, in line with legislative changes, or as a result of learning from the results of audits etc
- provide information and training on health and safety emergency preparedness and response action to relevant parties and individuals.

The health and safety emergencies that are most relevant to our business, which have been documented in our accident and incident investigation process are:

- Fire
- Road traffic incidents
- Small cuts, abrasions, bruises etc
- Lacerations, musculoskeletal injuries, fractures
- Ill health including exposure to hazardous substances such as lead
- Amputation of limb, burns, suffocation
- Break out of a listed communicable disease
- **Inhalation of CO2**



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*The Operational procedures covering the above can be accessed from the Compliance area on the P drive by staff and management. These are:*

Emergency Plan SM12

Accident & Incident Investigation Process SM13

Waste Battery Pre-acceptance Process EP11

Waste Battery Acceptance & Sampling Process EP12

All Portable and Non-Lead Industrial Batteries QM17

Automotive Lead Batteries QM15

Industrial Lead Batteries QM16

Site Operations All Chemistries QM14

Hazard identification and R/A SM24

*End of Section Five*

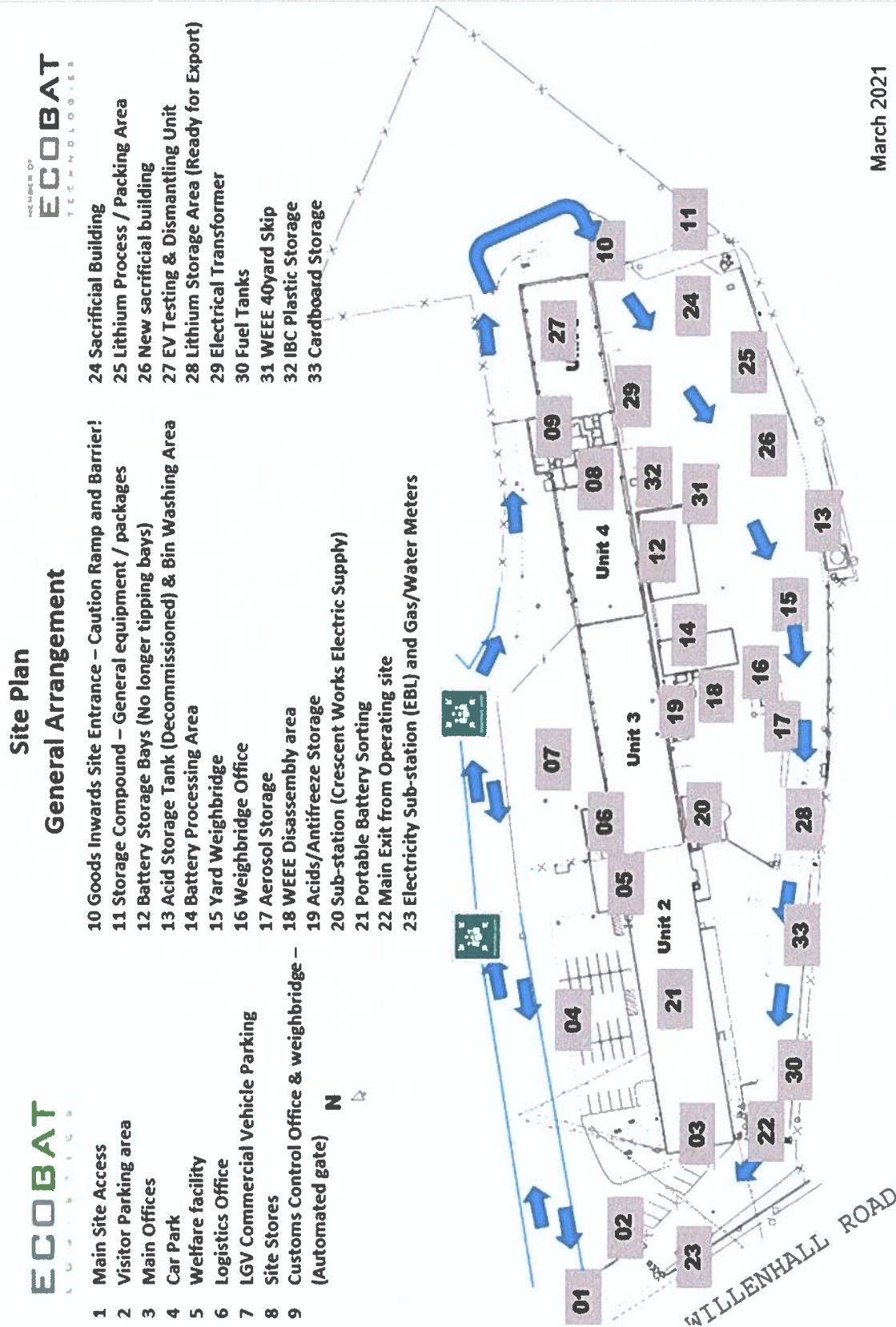


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## **Annexes**

- Annexe 1      Site Plan
- Annexe 2      Environmental Permit Boundaries
- Annexe 3      Principal Site hazards
- Annexe 4      Emergency arrangements
- Annexe 5      Emergency preparedness arrangements – Alarms and Call points
- Annexe 6      Site traffic control and Customs arrangements

**Annexe 1 Site plan**





9350 square meters approximately

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*Annexe 2 Environmental permit boundaries*

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**Annexe 3 Principal Site Hazards**

THE HOME OF OUR  
**ECOBAT**  
TECHNOLOGIES

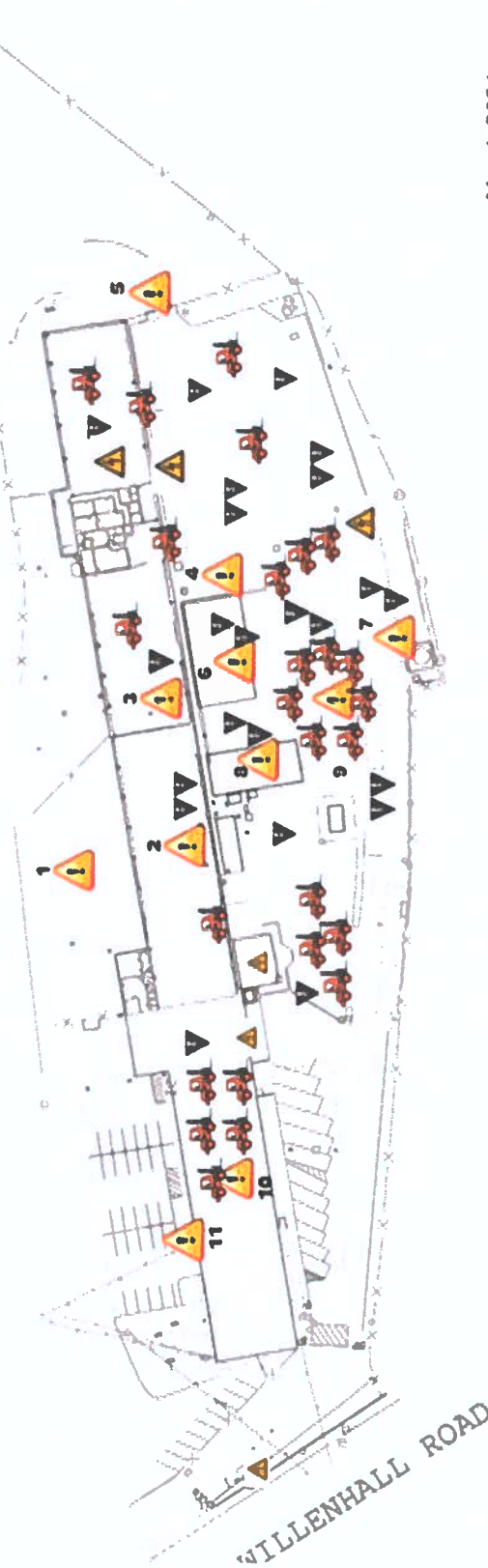
**Site Plan  
Principal Hazards**

Key Codes

- 1 x  Low FLT Activity
- 2-3 x  Medium FLT Activity
- 4-5 x  High Activity
- 5+  Very High activity
  
- 1 x  Low contamination
- 2 x  Medium contamination
- 3 x  High Lead contamination
  
-  Electrical Risk
-  Hazards



Hazard Codes






- 1 LGV Movements and Reversing activities
- 2 Effluent Treatment Plant
- 3 Lithium Battery Storage and Repacking operation
- 4 Skip loading and unloading
- 5 LGV Entry to site and Ramp/Barrier control
- 6 Battery Storage
- 7 Acid Storage Tank (Decommissioned) and Bin Cleaning activities
- 8 Battery processing
- 9 Main Vehicle loading and offloading area
- 10 Battery Sorting and FLT movements
- 11 Asbestos capped in wall cavity – DO NOT disturb

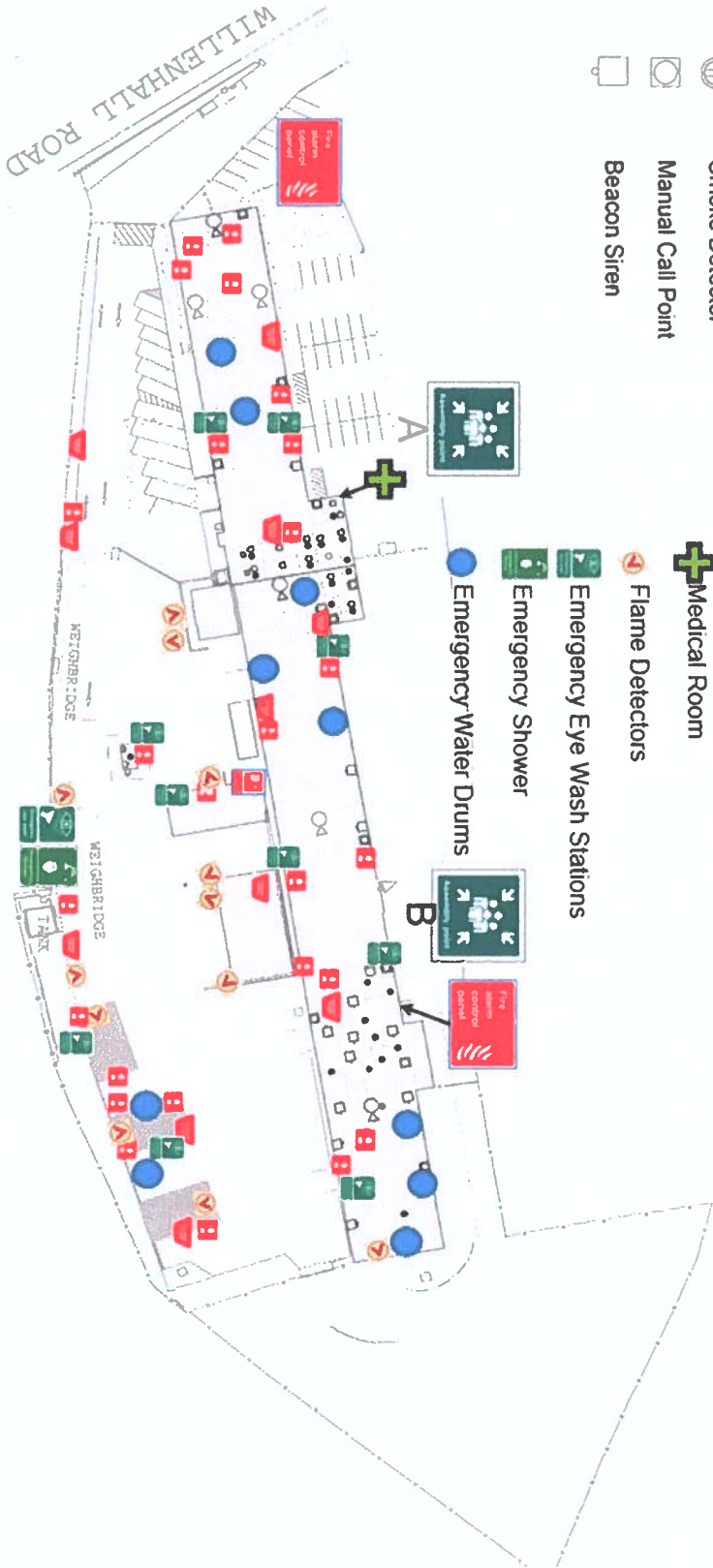


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- KEY**
-  Smoke Beam
  -  Smoke Detector
  -  Manual Call Point
  -  Beacon Siren

- KEY (Secondary)**
-  Fire Extinguisher Stations (see support page for class & types)
  -  Sand Bins (1 Tonne Dry Kin Sand)

-  Medical Room
-  Flame Detectors
-  Emergency Eye Wash Stations
-  Emergency Shower
-  Emergency Water Drums



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**Annexe 5 Emergency preparedness –**

**Emergency Arrangements  
– Specific for Emergency services**

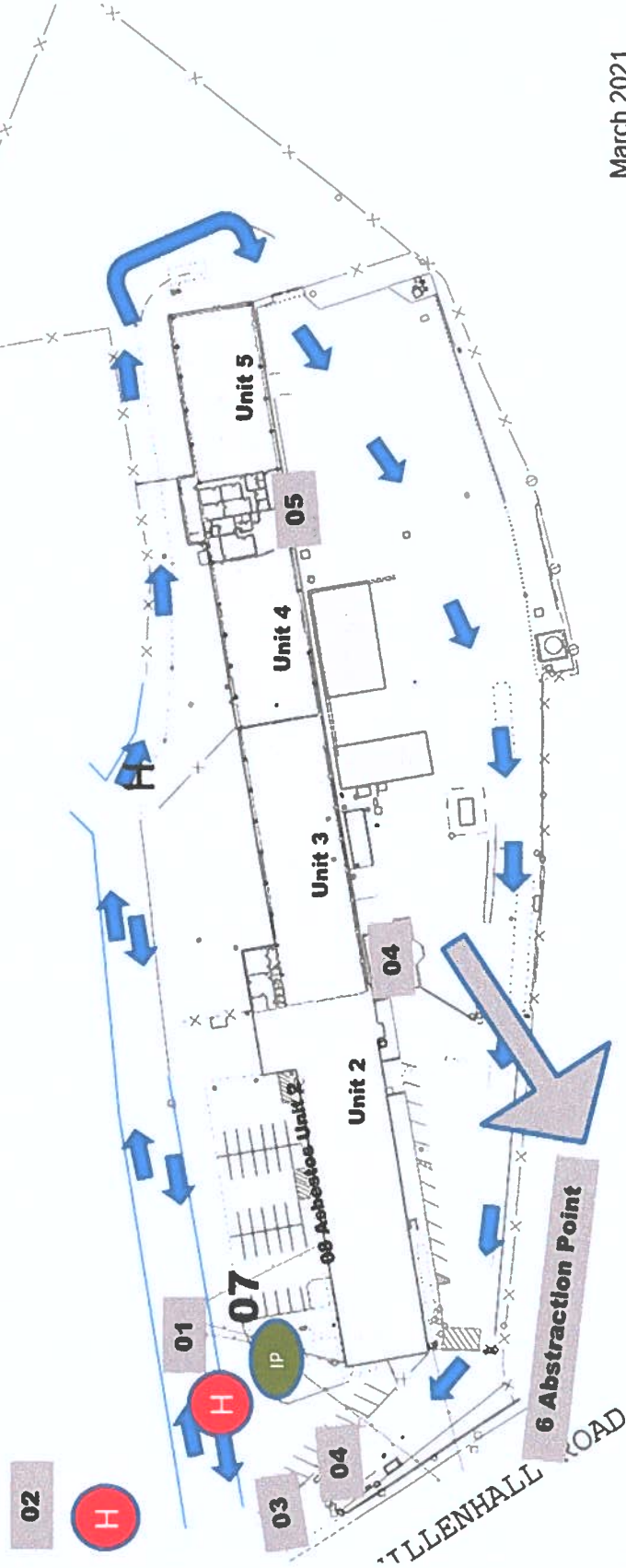
MEMBER OF  
**ECOBAT**  
TECHNOLOGIES

**ECOBAT**  
LOGISTICS

- KEY**
- 1 Fire Hydrant Crescent Works
  - 2 Fire Hydrant Willenhall Road – 5 mtrs passed gates.
  - 3 Gas Metre
  - 4 Electric Sub station
  - 5 Transformer
  - 6 Draw bridge to canal for water Abstraction
  - 7 Site Indicator Plan displaying Fire Zone activation.
  - 8 (Potential) Encapsulated traces of Asbestos contained within Unit 2 (north facing wall)

**Emergency Services use only  
Draw Bridge Access  
For water Abstraction.**

- Walsall Canal
- Alongside Bug hole Bridge.



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**Annexe 6 Site traffic control and Customs arrangements**

MEMBER OF  
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TECHNOLOGIES

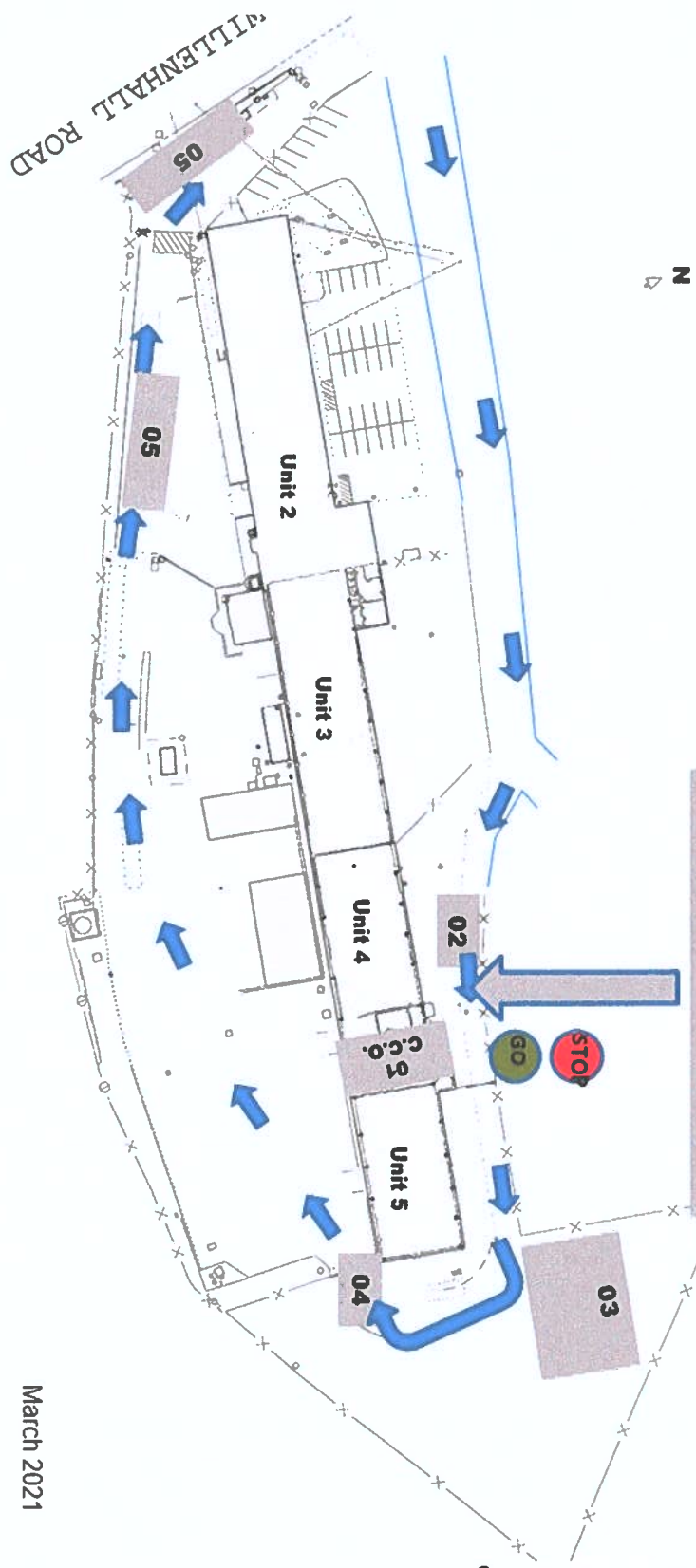
**Customs Control Layout & Arrangements**

**ECOBAT**  
LOGISTICS

- KEY**
- 1 Customs Control Office
  - 2 Inspection Lane
  - 3 Materials Received Holding Areas
  - 4 Site Entrance
  - 5 Materials Despatch Holding area for Goods Out


**07:00 to 17:00 Mon - Fri**

- Vehicle Inspection
- Materials Inspection
- Materials Flagged
- Materials Labelled
- Vehicle & Materials passed to Enter



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