Not Duly Made Question 10:
Accident Management Plans

Contents

SECTION A 23

INCIDENT REPORTING

Should a “near miss” occur which could have an adverse effect on the environment, the facts should be reported using a similar format as that used for accident reporting.

The General Manager or nominated deputy shall decide whether the Local Authority or the Environment Agency should be notified about the incident.

SECTION A 23 ….cont..

ANOCHROME LIMITED ENVIRONMENTAL INCIDENT REPORT

DATE……..
TIME……..

PERSON(S) INVOLVED IN INCIDENT

……
…

……
…

……
…

|MATERIALS INVOLVED
…….

……
..

WHAT HAPPENED?
…….

……
.

……

……

……

……

……...

HAS THE PROBLEM BEEN ADEQUATELY CONTAINED? ……

……...

HAVE AUTHORITIES BEEN NOTIFIED (IF REQUIRED)? ……..

WHAT CAN BE DONE TO PREVENT RE-OCCURANCE? ……

……

……

……

SIGNED …… DATE …….

EMERGENCY RESPONSES

SECTION E 1

MULTIPLE EMERGENCIES

In the event that a number of emergency conditions exist on site, the Senior Manager/ Supervisor on site will assess the overall situation and appoint appropriate personnel to monitor the areas in which the emergencies are present, and set up a control centre in the most appropriate office or, if necessary, off site.

Monitoring personnel will report all developments to the control centre as required, and will take all appropriate actions, as outlined in the emergency procedures.

SECTION E 2

ASSESSMENT AND NOTIFICATION OF EMERGENCIES

The Senior Manager or Supervisor on site will undertake an immediate assessment of all emergencies.

In response to all emergencies, designated individuals, as outlined in this manual, will undertake the appropriate actions.

In the case of one of the following emergencies, outside normal business hours, the appropriate personnel must be informed. Once a manager is notified, that manager will assume responsibility for notifying all other appropriate managers, so far as is reasonably practicable.

- evacuation of the site
- the attendance of the emergency services
- prolonged shut down of plant(s)
- activation of intruder or fire alarms
- an inability to control effluent discharges effectively
- the notification of any incident to Severn Trent Water or the Local Authority
- a major chemical spillage
- a serious personal injury

SECTION E 3

CHEMICAL SPILLAGE

MAJOR EVENT

In the event that a major chemical spillage occurs, the fire alarm must be sounded.

ALERTING FIRE BRIGADE

The Senior Manager or Supervisor on site will make an assessment of the situation, and, if necessary, contact the Fire Brigade

ALERTING MANAGEMENT

In the event that a chemical spillage occurs outside normal working hours, the appropriate managers must be notified, immediately after the emergency services.

MARSHALLING

The appointed Fire Marshalls or their deputies will be responsible for overall control of the situation. Chargehands will be responsible for ensuring the shutdown of machinery, wherever it is safe to do so, in accordance with the documented procedure.

Fire Marshalls, or their deputies will ensure that all personnel assemble in the relevant evacuation areas.

The Fire Marshall(s) on site will obtain a print out of all personnel who have logged in to the site, and check whether everyone has been identified as being safe.

Fire marshalling duties will be coordinated by the Senior Manager or Supervisor on site who will assume responsibility for maintaining communications and advising on the actions to be taken.

FIRST AID

All trained first aiders will report to the assembly point and also to the Senior Manager or Supervisor.

ELECTRICAL MAINS

Operators will shut down their machines and Chargehands will be responsible for the isolation of plant.

Electricians will close down mains supplies, where deemed necessary by the circumstances but, if it is safe to do so, lighting circuits should remain available to maintain good visibility for clean-up.

GAS

Operators will shut down their machines and Chargehands will be responsible to ensure that this has been carried out.

Maintenance will, providing it is safe to do so, shut down the gas supply to the factory.

SECTION E 3 ….Cont…

EFFLUENT PLANT

If it is considered necessary, the technical and maintenance personnel will make arrangements to shut down the Effluent Plant. Alternatively, Severn Trent Water will be notified that discharges may be outside consent limits.

VISITORS AND CONTRACTORS

Visitors in the factory, contractors, supply house representatives etc will be the responsibility of the Chargehands or Managers on whose sections they are working.

CONTAINMENT

If it is possible, and safe to do so, spill kits and absorbent granules will be used to contain or divert spillages.

DILUTION / DISPERSION

If it is safe and appropriate to do so, the spillage should be diluted and dispersed to appropriate effluent drains. When this is to be carried out this must first be approved by the appropriate manager.

When appropriate, Severn Trent Water must be notified at the earliest possible opportunity.

EMERGENCY SERVICES

If the emergency services are called, upon arrival the senior officer must be issued with copies of material safety data sheets for all materials involved in the spillage.

If there is any possibility that the spillage will enter a surface drain, the senior officer must be issued with details of the drainage routes.

SECTION E 3 ….Cont…

MINOR EVENT

In the event of a minor chemical spillage occurring (a minor spillage is one which does not have the immediate potential to pollute the environment because it is contained within the concrete hard standing confines of the site and cannot enter drains other than those which are connected to the effluent treatment plant) the following procedures must be observed :-

1. Assess the spillage and evacuate the area if necessary.
2. Put on appropriate personal protective equipment to minimize the risk of exposure to the chemical concerned.
3. Deploy appropriate spill kit equipment – seal drains with covers, use booms to contain running liquids, mop up spillages with pads or cushions.
4. Stop the source of the spillage
5. Reassess and ensure spillage is contained
6. Clean up area
7. Decontaminate – Place soiled spill kit equipment and contaminated personal protective equipment in plastic bags – INFORM Technical Manager (or nominated deputy) who will arrange safe disposal
8. Report spillage to appropriate manager who will arrange spill kit replenishment and decide whether preventative measures could be implemented to reduce the likelihood of a similar event occurring in the future.

SECTION E4

RUPTURED EFFLUENT TANK OR LARGE CONTAINER

In the event that a storage tank is ruptured the following procedures must be adopted;

The Senior Manager or Supervisor on site will be responsible for assessing the situation and monitoring the leak, and the containment of the fluid in to the area within the concreted area of the site.

All personnel movements within the vicinity of an affected tank must be halted until the tank has drained, and an approved waste disposal contractor has removed the fluid under controlled conditions.

An approved waste disposal contractor, at the earliest possible opportunity, must be contacted to make arrangements for the safe removal of the spilt fluid. Any residues must be safely neutralized.

If, for any reason, the leakage from a ruptured tank or container is in any danger of contaminating a surface drain, the emergency services must be called to site, the senior officer must be issued with details of surface drain routes, and the material safety data sheet for the product involved.

SECTION E 5

CHEMICAL REACTION OR EXPLOSION

In the event that a chemical reaction occurs due to the inappropriate mixing of chemicals on the site, for example solvent based materials and reducing and oxidizing agents, proceed as follows: The Senior Manager or Supervisor on site will evacuate the premises by sounding the fire alarm.

ALERTING FIRE BRIGADE

The Senior Manager or Supervisor on site will be responsible for assessing the situation, and, if necessary, contacting the fire brigade when the alarm is raised. If the occurrence happens outside normal working hours, the appropriate manager must be informed.

MARSHALLING

Appointed Fire Marshalls, or their deputies will be responsible for the overall control of the situation. Operators will shut down their plant and Chargehands isolate machinery, provided it is safe to do so.

The Fire Marshall(s) on site will obtain a printed of all personnel who have logged in to the site, and check whether everyone has been identified as being safe.

Fire Marshalls or their deputies will ensure that all personnel assemble in the correct area, or further away from the premises, should circumstances dictate.

Fire marshalling duties will be coordinated by the Senior Manager or Supervisor on site (or their nominated deputies) who will be responsible for maintaining communication and advising personnel on actions to be carried out.

FIRST AID

All trained first aiders will report to the assembly point and the Senior Manager or Supervisor on site.

CAUSES

The Senior Manager or Supervisor will establish the root cause of the reaction or explosion, and relay this information to the emergency services as well as the location of the source of the problem.

No attempt should be made to stem the reaction or contain the effects of an explosion, until the situation has been assessed by the Emergency Services.

ELECTRICAL MAINS

Operators will shut down their plants and Supervisors will isolate machinery provided it is safe to do so.

Electricians will close down mains, where deemed necessary by the Senior Manager or Supervisor but lighting should remain available, if possible, until all personnel have evacuated.

SECTION E 5 …cont…

GAS

Operators will shut down their machines and Supervisors will be responsible for ensuring that this has been carried out. Maintenance personnel will shut down the gas supply to the factory, provided it is safe to do so.

EFFLUENT PLANT

If it is considered necessary, the Technical Manager, or nominated deputy, will make arrangements to shut down the Effluent Plant. Alternatively, Severn Trent Water will be notified that discharges may be outside consent limits.

VISITORS AND CONTRACTORS

Visitors in the factory, contractors, supply house representatives etc will be the responsibility of the Supervisors or Managers on whose section they are working.

The Receptionist, or nominated deputy, will obtain a printed copy of visitors and staff on site and take it to the assembly area.

CARS

Cars should not be removed from outside the building.

ARRIVAL OF THE EMERGENCY SERVICES

Upon the arrival of the emergency services on site, the senior officer must be issued with the material safety data sheets for the aqueous materials involved. If there is any danger of chemicals entering a surface water drain, the senior officer must be issued with details of surface water drainage routes.

SECTION E 6

PLANT EMERGENCY SHUT DOWN PROCEDURE

- press the nearest emergency stop button
- switch off the isolator on the main control panel
- switch off the appropriate fused switch at the electrical distribution board
- switch off all conveyors
- isolate compressors (where appropriate) by closing air supply valves and turning main isolators off
- switch off gas supply (where appropriate)

ALL PLANTS MUST BE SHUT DOWN IN ACCORDANCE WITH ESTABLISHED PROCEDURES BY PLANT SUPERVISORS IF IT IS SAFE SO TO DO.

SECTION E 7

ALARMS

PURPOSE

There is only one purpose of an alarm. That is to warn people to take action promptly, to prevent harm, to persons, property or the environment.

All alarms must be duly heeded. People must always respond.

TYPES

There are several types of alarm used on the premises.

Fire Alarm

This alarm is to preserve life and prevent injury. Response must be immediate; everyone will evacuate the building, and assemble for checking that they are safe. The emergency services will be called if it is not safe to tackle the fire with extinguishers.

Effluent

This alarm is to notify personnel that one or more of the parameters controlled by the effluent plant is outside its tolerance limits. Prompt action is needed.

Plant Warnings

Personnel working on lines with these alarms need to be familiar with the warnings and take the appropriate actions.

PUBLIC ADDRESS SYSTEM

Wherever possible, announcements will be made to:

- Clarify the reason for the alarm
- Recall personnel after the emergency situation has been corrected
- Declaring that all is well after a false alarm
- Confirming practice drills

DO NOT RELY ON THE PUBLIC ADDRESS SYSTEM – IT MAY NOT ALWAYS BE USABLE

SECTION E 7 …cont…

REACTION TIMES

For fire alarms, evacuation should be completed within three minutes. Plant alarms should be addressed as soon as practicable, but within ten minutes maximum.

TESTING ALARMS

Fire alarms are tested weekly

DRILLS

Fire evacuation drills are conducted, at a minimum frequency of twice per year, for both shifts.

ASSEMBLY AREA

The assembly area is normally in front of the buildings, but will be further from the buildings if circumstances dictate.

SECTION E 8

EMERGENCY RECOVERY PROCEDURE

Following a site emergency, the Senior Manager on site will be responsible for:

Commencing start up procedures as soon as approval has been given by the Maintenance Department, emergency services, and any external personnel involved in plant repair and/or restoration of services.

Ensuring that accident reports are compiled relating to any casualties, for inclusion in the incident report.

Ensuring that all appropriate details relating to the emergency; i.e. date, time, cause (if known), containment and preventative actions etc, are made known to the Safety Officer in the form of a completed / completed so far as is possible, incident report.

Ensuring that, in the case of a critical plant, which is not practicable or safe to restore; that the associated work is transferred, wherever possible, to another Group facility.

Liaising with any emergency services called to the site, to ensure that it is safe for personnel to enter and commence start up procedures.

Liaising with maintenance personnel with regard to the resultant condition of plant, machinery; and services, and the arrangements necessary to facilitate their start up and operation.

Ensuring that all such work is carried out prior to start up procedures, being authorized, by internal or external personnel, as appropriate.

Ensuring that all casualties, who are unable to recommence work, are looked after safely.

Ensuring that any area of the site, or any equipment, rendered unsafe by the emergency, is isolated and that access or operation is prevented effectively.

The Safety Officer, in conjunction with the General Manager, will review all accident and incident reports as appropriate.

The following actions will take place, when required:

- Notification of appropriate authorities
- Investigation of the key elements leading to the emergency.
- Evaluation and instigation of appropriate measures to prevent reoccurrence.
- Review operating procedures, and include, where appropriate, preventative measures that need to be introduced.
- Review all risk assessments associated with all elements of the emergency

SECTION E 8 …cont…

- Review COSHH assessments of any materials involved.
- Consider whether any additional risk assessments are necessary and complete, if required.
- Evaluate the impact of the emergency on local residents and the environment and advise appropriate personnel accordingly.
- The Site Management Team will remedy all local environmental impacts and instigate and enforce preventative measures within the local neighbourhood as soon as is practicable.

SECTION E9

POWER FAILURE (ELECTRICITY)

In the event that a power failure occurs, of more than 15 minutes duration, the following procedure must be adopted.

- all plants must be shut down in accordance with emergency shut down procedures.
- the premises should be evacuated if the power failure occurs during the hours of darkness, as follows,

MARSHALLING

Appointed Fire Marshalls or their deputies will be responsible for overall control of the situation.

Fire Marshalls or deputies will ensure that all persons are accounted for and, if it appears that the power failure will persist for several hours, personnel will be sent home.

GAS SUPPLY FAILURE/ GAS ESCAPE

If the gas supply fails, the Senior Manager or Supervisor on site must ensure that all gas-powered equipment is checked by properly qualified maintenance personnel and that all such equipment is isolated by means of the valve supplying each burner.

The gas supplier must be notified by the Senior Manager or Supervisor on site that failure has occurred.

Affected plants may only be re-ignited under the direct supervision of the maintenance personnel.

In the event that a gas escape is detected or suspected, TURN OFF THE SUPPLY AND EXTINGUISH ALL SOURCES OF IGNITION. If necessary, contact the Gas Escape Hot Line – 0800 111999.

EFFLUENT PLANT FAULTS CAUSING FLOODING

Failure of effluent transfer pumps is signalled by alarms. If flooding in the treatment pit occurs, turn off all dosing equipment and the water supply. If necessary, pump effluent from the pit with a portable pump.

If there is a likelihood of effluent entering surface water drains, for example, due to a pipe breakage or tank leak, Severn Trent Water must be informed.

The Technical Manager must be informed if the problem cannot be rectified quickly.

SECTION A17

EFFLUENT PLANT OPERATION AND MANAGEMENT OF OUT OF CONTROL CONDITIONS

Suitably qualified personnel will monitor the performance of the effluent plant, at a minimum frequency of once per day.

If the quality of the effluent is poor, or if one of the instruments is displaying a reading that is out of range, the situation must be treated as an emergency, and action taken as described in the section entitled “Alarms”.

If the quality of the effluent is poor, but no alarms are showing, then this is likely to be due to suspended solids remaining in the effluent stream.

Possible causes

i) Low concentrations of flocculating agent, pumps not working correctly or pipe work from flocculant tank blocked

ii) Excessive amount of flocculant present (this is characterized by solids floating on the surface when a sample is taken and allowed to stand for a few minutes). In other cases, the suspended solids will slowly settle to the base of the sample container

iii) High level of sludge in the settlement tower

Whatever the cause, the discharge must be stopped immediately, by turning off the water supply, while the cause is investigated and corrected.

EFFLUENT SHUT DOWN PROCEDURE

Turn off all plants and rinses first

The control panel must be adjusted as follows-

Caustic dosing switch - off

Acid dosing switch - off

Stirrers - off

Unless “out of control” conditions are present, leave all other switches “on”

SECTION A 17…Cont…

EFFLUENT PLANT ALARMS

Effluent plant faults are signalled by a distinctive, audible alarm.

All effluent alarms must be answered promptly. Failure to do so could result in the discharge to sewer having contaminants within it being above consented levels.

The senior manager or supervisor on site is responsible for ensuring that the fault is dealt with in a prompt and efficient manner.

Should the person answering the alarm be unable to correct the problem, plants must be shut down, in accordance with the correct procedure, and management informed.

If appropriate, Severn Trent Water and the Environment Agency must be informed that an out-of-consent discharge may occur.

Equipment must not be restarted until suitably qualified personnel are available to supervise start up, and faults have been addressed.

Reacting to Effluent Alarms

An alarm call should be addressed as follows:-

Review the control panel and determine which parameter is out of control.

Silence the alarm.

Investigate the cause of the alarm, and rectify it, or shut down plant in accordance with appropriate procedures.

If recurrent, record the circumstances on the effluent log sheet.

SECTION A 17…Cont…

NEUTRALISATION TANK – pH CONTROL

Adjusts pH of the effluent stream to the optimum level for precipitating zinc (7.5-8.2) prior to transfer to the settlement tower.

If the pH falls outside this range, for more than six minutes, the alarm is activated.

Possible causes

i) High volume of flow from acid side of effluent treatment plant, due to solution being dumped, tank or valve leaking.

ii) No sodium hydroxide in dosing tank

iii) Solenoid valve stuck closed, or pipe work blocked.

iv) Output from meter to solenoid motor damaged

v) Probe broken or dirty

vi) Probe no longer responding – needing replacement

vii) Meter or wiring connections damp – residual current leak

The lower set point controls the addition of sodium hydroxide to the treatment tank. This should not be altered without the express permission of the Technical Department. If the pH is outside its prescribed range, then zinc and other metals may remain in solution, leading to the discharge being outside consent limits.

FINAL DISCHARGE METER – pH MONITORING

Monitors pH of final discharge. If this is within the prescribed range, and the discharge is clear, this is a very good indication that the effluent is of good quality.

If the pH goes outside the range (7.8-10.8) the alarm is activated.

Possible causes

i) Effluent stream from neutralization tank has the incorrect pH.

ii) Output from probe to meter is damaged

iii) Probe is broken or dirty

iv) Probe no longer responding – needing replacement

SECTION A 17…Cont…

v) Meter or wiring connections damp – residual current leak.

The set points of this meter should not be altered without the express permission of the Technical Department.

SETTLEMENT

Following precipitation of the metal compounds in the effluent stream, settlement is aided by combining them with a long chain, high molecular weight organic compound known as a flocculant. It is important to note that too little flocculant could result in precipitated material not settling correctly and too much flocculant can cause precipitated materials to gelatinize and float, again leading to discharge of precipitated compounds.

Flocculant is dosed flow proportionately to the effluent stream from the make-up tank, this must be prepared adding 80 grammes of flocculant to one full tank of water. The lower level for this tank is where the conductivity probes do not form a closed circuit and the alarm is activated.

EFFLUENT DISCHARGE MEASUREMENT

The correct operation of the discharge flow meter is the responsibility of the Technical Manager.

Validation of the flow meter readings is established in two ways:

i) Comparison between incoming and outgoing meter readings shall take place at least once per month, to ensure that the difference between the two flow rates is in the order of 30%. Outgoing water volumes will be lower than incoming quantities due to evaporation in warm and hot processes.

ii) Calibration every year by supplier or other nominated contractor, Adherence to the calibration schedule is monitored by the Group Quality and Environmental Manager,

Records of the incoming and outgoing water meter readings shall be maintained by the Site Maintenance Manager and the General Manager and the Technical Development Director or Group Quality and Environmental Manager will be informed if any significant discrepancies or unexpected readings are noted. Where relevant, a “breakdown report” shall be opened and a record of the cause of the discrepancy maintained.

“Significant discrepancies” and unexpected readings shall include:

i) If the outflow meter shows a higher reading than the incoming water meter volume measurement

SECTION A 17…Cont…

ii) A variation of more than 20% in the water flow compared with historical flow rates, taking in to account the level of activity of the company.

If the flow meter is replaced by another unit, MCERTS verification is required and the Environment Agency shall be informed

In the event of a malfunction of the flow meter being suspected or confirmed, the General Manager will be informed and repairs carried out as soon as is reasonably practicable.

Instantaneous effluent flow management is measured every fifteen minutes to monitor whether the Site Consent Limit of 15 litres per second is not being exceeded. The flow measurements will be maintained on a spread sheet by the Group Technical Development Director or Group Quality and Environmental Manager at a minimum frequency of once every two months,

Maintenance

Monthly inspection shall be carried out by the maintenance department, to verify that the sensor window is clear and that any build-up of sediment on the sensor tube or "V" notch is removed. Observations about the degree of fouling shall be recorded on the planned preventative maintenance form.

Inspection of the meter and associated equipment will take place as part of the yearly calibration and any necessary maintenance will take place at that time.

Unscheduled maintenance will be carried out if discrepancies in the meter readings are identified as part of the verification process.

Flow meter installed - 2nd September 2011 ABB 5RW Logging – 7.0.4E

Sensor - dB 10

Meter - EFM 1

Verification

A full audit of the effluent discharge flow measurement system shall be undertaken by the Technical Development Director or Group Quality and Environmental Manager once per year.

SECTION A 19

MAINTENANCE OF EXHAUST AND SCRUBBER SYSTEMS

Extraction ducting will be visually examined at a minimum frequency of three times per month to check for blockage, damage or deterioration.

Fans will be examined at a minimum frequency of once per month to check for damage and build up of deposits. Spraying systems and alarms for the scrubbing solutions will be examined at the same time.

Records will be maintained within the Planned Preventative Maintenance log for the plants concerned.

The pH probes for the scrubbing solution will be serviced every three months at the same time as the effluent plant equipment is examined and calibrated.

Thorough examinations of local exhaust ventilation systems will be undertaken by the Group Technical Director at a minimum frequency of once every 14 months.

Emissions to atmosphere shall be sampled at a minimum frequency of once per year by an MCERTS registered consultant to establish whether the concentration of hydrogen chloride in the exhausted gasses is within the limit cited by the Industrial Emissions Directive Permit.

Emission points

Emission point ref no.	Description	Location of emission point
A1	Automatic Vat line scrubber vent	Point 1 on site plan
A2	Automatic Barrel line 1 scrubber vent	Point 2 on site plan
A3	Automatic Barrel line 2 scrubber vent	Point 3 on site plan
A4	Automatic Phosphate plant scrubber vent	Point 4 on site plan
A5	Local exhaust emissions from Zinc Nickel plating line	Point 5 on site plan

Failure of Scrubber Systems

Should a failure of a scrubber system occur, it is deemed satisfactory to continue processing for a maximum period of 24 hours before the system is repaired, since it can be demonstrated that, if emissions are not scrubbed, concentrations of hydrogen chloride within the exhaust gases are typically below the permitted discharge concentration limit.

Anochrome Group

DISASTER RECOVERY PLAN

Last Review: August 2023

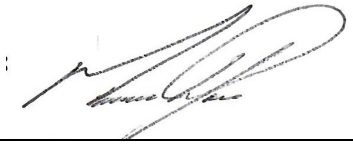
Reviewed By:	S Guilmant	**Authorised By:**	Mark Jones
Signature:		**Signature:**	
Job Title:	Group Compliance Manager	**Job Title:**	Managing Director
Date:	August 2023	**Date:**	August 2023

Table of Contents:

Section 1

INTRODUCTION

This Disaster Recovery Plan details the procedures and resources required to promote and expedite the recovery of the metal finishing companies within the Anochrome Group following a serious incident or disaster. It assumes substantial damage to the buildings and contents such that reoccupation is unlikely in the short term and business continuity will extensively rely on the immediate implementation of contingency measures. The businesses are sufficiently alike to prepare only one plan for the Anochrome Group .

However, site specific requirements will have colour coded pages, details below:

Inlex Locking – Green

Anochrome Limited – Red

Anochrome Technologies – Yellow

WEP - Blue

It is essential that staff are aware of the existence of the plan, with copies being held off site.

In the event of an incident at a specific site and the Disaster Recovery plan cannot be accessed, contact the nearest Anochrome Group site to provide you with a copy of this document.

The plan is a controlled document and all copies must be updated when new sections or alterations to sections are issued.

This document is annually reviewed, when reviewed issuance of new document will be released by Group Compliance Manager. Any changes during review will be logged in Section 8 of this document.

Responsibility for the maintenance of the plan rests with the Disaster Recovery

Co-ordinator: Mr M Jones

Controlled Copies:

Copes of the plan, along with any site relevant information, will be retained in the following areasa live copy can also be found at this location: G:\Quality\Group IMS Data\17 Business Continuity & Emergency Preparedness\Disaster Recovery Business Interuption Analysis\Disaster Recovery Plan Group Doc\2023\Disaster Recovery Plan 2023 new version.doc

Copy No:	Owner:	Location	Release Date:
01	Chief Executive	Chief Executive's Office	29/09/2023
02	Group Engineering Manager	Group Engineering Manager's Office	29/09/2023
03	WEP Ltd	Reception	29/09/2023
04	Anochrome Ltd	Reception	29/09/2023
05	Anochrome Technologies Ltd	General Office	29/09/2023
06	Inlex	Reception	29/09/2023

OBJECTIVES

To effectively and efficiently manage the initial crisis of the disaster.

To promote the implementation of appropriate remedial action.

To facilitate a full recovery of the site and facilities in the shortest practical time.

To establish a method to continue the business at remote sites.

To establish an efficient communication plan for employees, customers, suppliers, financial institutions, and the media.

To minimise or eliminate loss of income due to the disaster.

To maintain the viability and integrity of the business by servicing customer's expectations as far as is practicable.

CRITICAL ASSETS

Definition: Those assets which if lost or unable to function would seriously affect the operation of the business.

They can be categorised under the following headings and descriptions:

HUMAN - The company employees and suppliers.

PHYSICAL - Buildings, Processing lines and Effluent Plants

INTELLECTUAL - Expertise for setting up and running systems and processes cost effectively.

Section 2

ACTIVATION

This section covers the procedure to be followed in the immediate aftermath of a serious incident that has the potential to cause casualties and has left the buildings unsafe.

During Normal Working Hours the Site management will be responsible for:

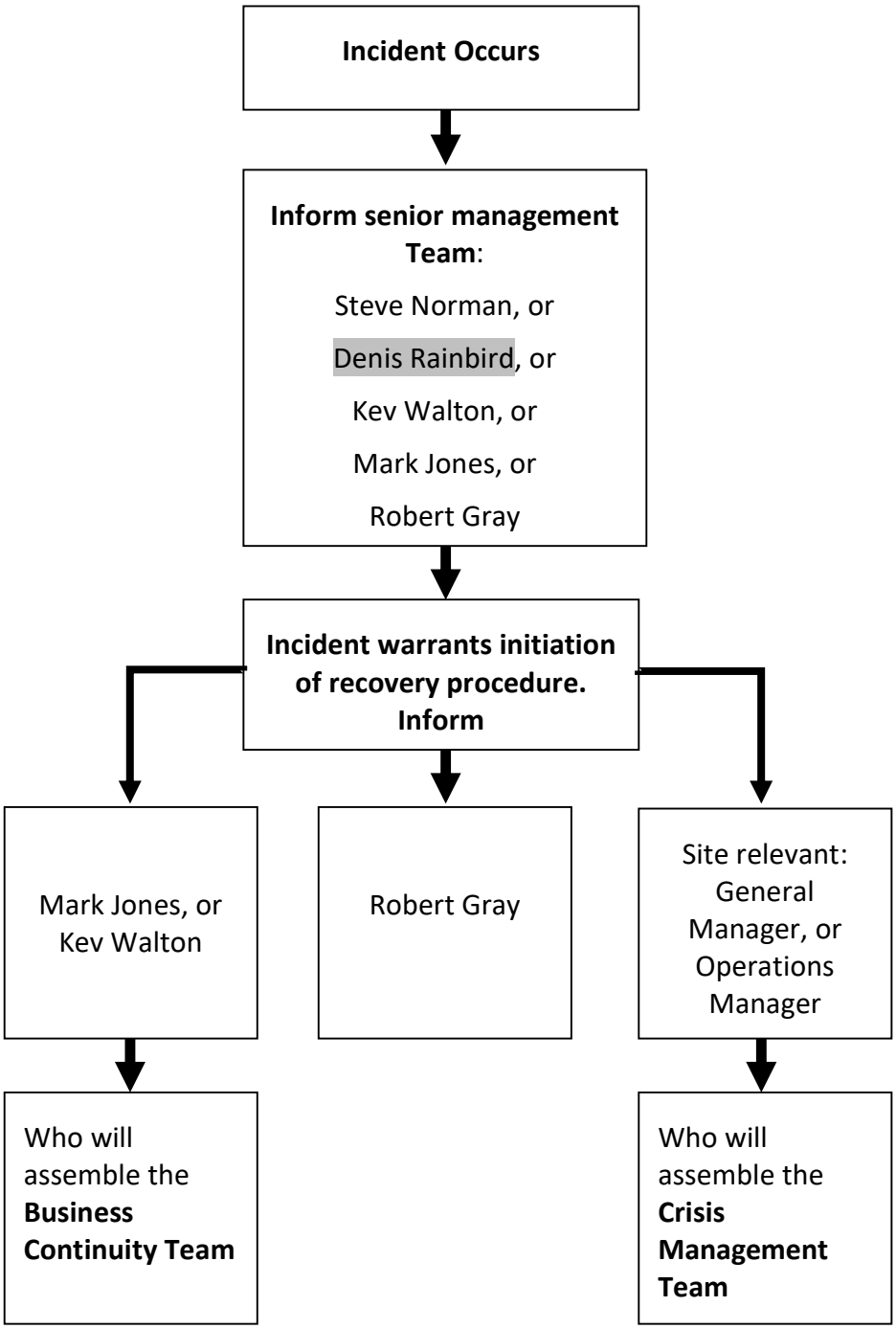
- Ensuring that the emergency services have been notified.
- Ensuring that the building is evacuated, and staff and visitors are accounted for in accordance with the Emergency Procedures.
- Notifying the relevant personnel in accordance with the activation procedures

Outside Normal Working Hours - If an incident occurs out of normal working hours, a keyholder will be notified in the first instance will:

- Ensure that the emergency services are notified.
- Notify the relevant personnel in accordance with the activation procedure.

ACTIVATION PROCEDURE

Process:



Section 3

RECOVERY ORGANISATION

The Recovery Plan is based on establishing a management organisation for recovery with members having defined responsibilities within the recovery process operating from identified contingency locations. (It is important that over the disruption period the normal decision-making process is replicated as far as possible).

The management function can effectively be divided into two operational teams as follows:

BUSINESS CONTINUITY TEAM	Responsible for the strategic guidance and planning to achieve recovery of the business in the shortest possible time and for overseeing the ongoing business activity during recovery.
CRISIS MANAGEMENT TEAM	Responsible for co-ordinating recovery operations at the scene of the disaster during and immediately after the event and attending to the practical task of reinstating operations and continuing production.

NOTE: *Membership of the two teams need not be mutually exclusive.*

BUSINESS CONTINUITY TEAM - Key **RESPONSIBILITIES** to include:

- Establish and implement overall strategy for recovery,
- Establish the overall financial parameters which the recovery will take place,
- Identify options for business relocation (architects) and equipment including IT, utilities, and stock needs,
- Liaise with other group companies and transport contractors to re-direct work, organise overtime, subcontract work and deal with suppliers,
- Liaise with **Crisis Management Team** to redirect post and telecommunications; re-establish IT function at remote site for invoicing,
- Liaise with **Crisis Management Team** as necessary, to authorise any salvage/clean-up operations,
- Communicate with financiers, insurance brokers and key suppliers and keep them informed of developments,
- Determine policy for communicating with customers/the public,
- Liaise with customers and suppliers,
- Keeping employees informed of the situation and re-deploy as necessary,
- Arrangement of temporary financial provision, as required, for recovery and authorise any expenditure required by the CMT,
- Maintain a record of expenditure incurred in the recovery process,
- Direct public relations/media liaison and prepare a press statement,
- In the event of employee casualties' direct policy towards next of kin as required.

CRISIS MANAGEMENT TEAM – Key **RESPONSIBILITIE**S to include:

- Maintain a close liaison with the emergency services in the immediate aftermath of the event,
- Secure the damaged premises and contents and co-ordinate the salvage of equipment and assets from the site,
- Account for all personnel on site at time of incident (staff, visitors, contractors),
- Provide a point of contact for employees in immediate aftermath of a disaster occurring outside working hours. Employees not immediately required sent home,
- Assess the extent and impact of the incident and keep the Business Continuity Team regularly appraised,
- Notify key personnel from other sites and organise assistance as required,
- Re-instate IT records using back-up arrangements or on another designated site,
- Organise temporary accommodation on site, power supplies and welfare amenities,
- Arrange for re-direction of incoming telephone calls. Organise telecommunications for temporary accommodation on site. Prior to this use mobile phones,
- Liaise with external agencies, e.g., loss adjusters, salvage operators, security companies,
- Establish extent of loss in respect of work in progress and liaise with Business Recovery Team regarding customer briefings,
- Establish current work commitments and attend to critical business operations as detailed,
- Establish communications link with suppliers (communication to be via mobile phone or other Group offices prior to re-establishing telecommunications) and liaise with **Business Continuity Team**,
- Arrange for re-direction of post for affected site,
- Organise transport requirements to facilitate contingency arrangements in conjunction with the **Business Continuity Team**,
- Maintain a log of events/expenditure,
- Consult with or on the following agencies/organisations:

    Builders

    Plant

    Raw materials

    Utilities

    Environment Agency

    HSE

Section 4

LOGISTICS

Group Contacts lists

Critical Business Operation:	**Critical Asset:**	**Contingency Measure/Priority Action:**	**Subcontractor details if not able to use group facilities:**	**Contact Details:**
Plating	Plating Lines	Use group facilities at other sites	Reeve Metal Finishing, Anne Road, Smethwick	0121 558 0692
			Ashton & Moore, Smith Street, Hockley, B19 3EX	*08456 188196*
			Electrolytic Plating, Darlaston Road, Walsall	*01922 627466*
Establish management team to co-ordinate outsourcing activities.				
IT - Records; Stock Control; Order Processing; Invoicing; Pricing; etc.	Main frame computer system	Reinstate hardware within 48 hours (acceptable downtime).	Unique Business Solutions	Steve Alcock 07973 382881
	Software	Copy software available from: Other Group companies (generic)		
	Software	Orpheus, Timegate databases.	Acton Gate	Mark Dimmock 07977 431106

COMMUNICATIONS

When the decision has been made to activate the Recovery Plan and when circumstances render the main office/switchboard untenable the following actions will be taken to ensure continuity of communications:

- All communications will initially be from home and/or mobile telephones.
- Arrange for the re-direction of incoming calls and additional telephonists (if required) to the contingency location,
- Communication at the site to be via mobile phone in the first instance *(re-distribution may be necessary i.e. to members of the Crisis Management Team).*
- Arrange for post to be re-directed as required.
- Arrange for IT support companies to provide hardware and operating software is made available at the recovery location.

INVOICING AND EXPENSES

As all accounting systems for Anochrome Group are cloud based. In the event of one of the location being unable to carry out day to day accounting functions, the function can be carried out at an alternative Anochrome group location.

MOBILE PHONE NUMBERS

Name	Job Title	Contact Number	Mother Location
Senior Management Team:			
Rob Gray	Chief Executive	07973 168605	WEP
Mark Jones	Managing Director	07794 224902	WEP
Kev Walton	Group Thread Locking, Sealing & Purchasing Director	07583 064512	WEP
Steve Norman	Divisional General Manager	07980 965489	Anochrome Ltd
Denis Rainbird	General Manager	07966040605	WEP
Chris Aston	Group Engineering & Project Manager	07775 842621	WEP
Richard Chater	Group Health and Safety Manager	07583 077643	WEP
IT Support:			
Mark Dimmock	Action Gate	07977431106	
Stev Alcock	UBS	07973382881	

INLEX LOCKING LIMITED:

ANNEXE A – BUSINESS CONTINUITY TEAM:

COMPOSITION	TELEPHONE NO:	
	Home	**Mobile**
Chief Executive: Robert Gray	**01743 232328**	**07973 168605**
Group Project Manager: Chris Aston		**07775 842621**
Group Director: Kev Walton		**07583 064512**
Operations Manager: Wayne Murphy		**07760 282387**

The location of the Business Continuity Team will be decided during the initial phases of the disaster.

ANNEXE B – CRISIS MANAGEMENT TEAM:

COMPOSITION	TELEPHONE NO:
	Mobile
Group Director: Kev Walton	**07583 064512**
Group Project Manager: Chris Aston	**07775 842621**
HSE & Technical Support Manager: Richard Chater	**07583 077643**
Operations Manager: Wayne Murphy (Maintenance – Chris Lee)	**07760 282387**
Secretarial Support: Gareth Lowndes **Alternate:**	**07837 265779**

The location of the Crisis Management Team will be decided during the initial phases of a disaster. If offices are not available use a Portakabin on site where practicable. See contact details below:

Portakabin…….0121 565 4000.

ANNEXE C - Customer Details:

Below is a list of suppliers that will require contact in the event of a disaster that would cause business disruption:

Customer Name	Location:	Contact Number:
Auto Fastners Limited		01926814600
Bulten		01724 749407
Barton Coldform		01905 777011
Bollhoff		01902 638406
Complex Cold Forging (CCF)		01215565700
Dejond/Tubtara		0032 38203411
Dynacast		01938 55500
Fastinox		01684 423140
Fitlock Systems		01614836220
Hexstone Icon Faste		01902 491122
International Fasteners		01788 546001
Optimas Solutions (Barton UK)		
ANIXBRIE	Gloucester	01452 880511
ANIXSTOC	Stockport	01614 062851
IFSGLO	Gloucester	01452 880592
SFS Group Fastenings Tech		01535 212237
Supply Tech Woodgate		01213591155
TR Fastenings		
TRFAST 32	Co Durham	01325 372933
TRFAST 34	Newton Aycliffe	01325372932

If the form is left blank the location has advised Group that in the event of a disaster at site, Customer details can be accessed from the cloud at an alternative Anochrome Group location.

ANNEXE D - Suppliers Details:

Below is a list of suppliers that will require contact in the event of a disaster that would cause business disruption:

If the form is left blank the location has advised Group that in the event of a disaster at site, Customer details can be accessed from the cloud at an alternative Anochrome Group location.

Supplier Name	Commodity:	Contact Number:
Hammonds Chemicals	Tolulene	01384 480600
Rods UK Ltd	Soluble Cutting Oil	01827 283211
	Merwin 65	
	Washing Oil	
Precoat USA	Omnimask	00586 752 5003
Precote	Precote 85	0049 89 143381
	Precote 80	
	Precote 30	
	Precote 15	
	Precote 5	
	Precote Top 300	
Hylomar	Rimlex	01942 617000
3M	Scotchgrip 2353	01344 858000
	Scotchgrip 2510	
Nylon Colours	Eslok Nylon	01296433754
	HighTemp Nylon	
Nylite USA	Coils and seals	0011 908 561 1300

ANNEXE E – Business Interruption Analysis:

The processes carried out by the company are, unique to the group and are not available at other sites. Being a competitive business area and it is unlikely that extensive sub-contract help would be available.

A large percentage of the components being processed have first had coatings applied by WEP. There is, therefore, no significant buffer stock available.

Optical Sorting

There are two machines in use. There are no alternatives available in the group, but support is available from the machine manufacturers and packaging facilities. This could create transport and lead time pressures. Certain features can be checked by hand and visual inspection/manual gauging and additional labour could quickly be acquired for carrying this out.

Time to replace this equipment – approximately 20 weeks.

Pre-applied Sealants and Adhesives

There are several machines available to apply sealants and adhesives; all are stand-alone units. There are several types of raw material sourced from 3M, Omnitechnick (Germany), and Hylomar. They could be interchangeable, and some alternatives are available.

Time to replace these machines – approximately 20 weeks.

Plastic Patch (Eslok)

There are several automatic and two hand feed machines involved in the process, all having a separate generator for the induction heaters. There are numerous sources for raw materials.

Time to replace this equipment – approximately 20 weeks.

Lubricants and Waxes

Two interchangeable machines are used in the process with replacement times in the region of six weeks. The machines are also interchangeable with those used for Plastic Patch. Material. Supply is not seen as a problem as this type of material is available from several sources. Water based TOP300 has been adopted by all customers and could be interchangeable with some alternatives available. The site also has links with Prelok (Germany) who would provide support /materials if requested.

Time to replace this equipment – approximately 20 weeks.

Rimlex

Several application machines are available for putting sealants on to various fasteners. These machines are not all in use at one time, although several units are often in demand 24 hours per day, five or more days per week. Some Rimlex capacity is available within the Group (Czech

Republic). The application machines (Fisnar) are easily portable, and some are standard pieces of equipment. The supplier usually has a spare machine available, if necessary,

equipment can be imported / relocated and set-up within 48 hours. Jigs would have to be made in the event of a major problem, which made them unserviceable, and this would take several days.

Consumables are purchased from two sources, but the usage is low, and the suppliers keep enough material in stock to satisfy any foreseeable demand.

This facility has an associated oven for drying and curing components, this can be carried out in several ovens throughout the Group, if required. This type of oven is readily available and Inlex have a spare oven stored on site.

Time to replace all machines approximately 20 weeks.

The equipment within Inlex Locking Ltd is all free standing, and requires gas, electricity and compressed air, making the setting up of production on an alternative site relatively straight forward – although access to small cleaning and shot blasting equipment would need to be used.

Test Equipment

Testing in Inlex requires the use of torque wrenches, drivers with transducers to measure applied torque and air decay equipment. Most of this is readily available from suppliers, however, specialised test blocks would need to be manufactured.

Machine	Material	Process		Alternative
Rimlex Dipping		Automated		Manual
Rimlex	620B	Automated		Manual
Rimlex	Yellow	Automated		Manual
Round Table	Precote 80	Precote and Scotchgrip materials can be produced on several machines.		
	Precote 85			
	Scotchgrip 2510			
	Scotchgrip 2353			
CS81	Precote 80			
	Precote 85			
	Scotchgrip 2510			
	Scotchgrip 2353			
CS82	Precote 80			
	Precote 85			
	Scotchgrip 2510			
	Scotchgrip 2353			
Twin Belt	Eslok Nylon	Eslok Nylon can be produced on several machines		
Long Bed	Eslok Nylon			
Main Belt	Eslok Nylon			
Mini Belt	Eslok Nylon			
Pin Wheel	Eslok Nylon			
Omnimask	Omnimask	Outsource to external company		

Anochrome Limited:

ANNEXE A – BUSINESS CONTINUITY TEAM:

COMPOSITION:	TELEPHONE NO:	
	Home	**Mobile**
Chief Executive: Robert Gray	01743 232328	07973 168605
Group Managing Director: Mark Jones		07794224902
Group Project Manager: Chris Aston		07775 842621
General / Production Manager: Steve Norman	07969 537326	07980 965489

The location of the Business Continuity Team will be decided during the initial phases of the disaster.

ANNEXE B – CRISIS MANAGEMENT TEAM:

COMPOSITION:	TELEPHONE NO:	
		Mobile
Site General Manger: *Steve Norman*	**07969 537326**	**07980 965489**
Group Project Manager: Chris Aston		**07775 842621**
Technical / Laboratory Manager: Rob Tennant		**07909 119442**
Operations / Maintenance Manager : Sean McReynolds		**07974 183385**
Secretarial Support: Sheryl Plant **Alternate:**		**07766 995608**

The location of the Crisis Management Team will be decided during the initial phases of a disaster. If offices are not available, use a Portakabin on site where practicable. See contact details below:

Portakabin…….0121 565 4000.

ANNEXE C - Customer Details:

Below is a list of Customers that will require contact in the event of a disaster that would cause business disruption:

Customer Name	Location:	Contact Number:
Walsall Pressings	Wednesbury Road, Walsall	01922 721152
Eu-Matic	Herald Avenue, Coventry	02476 673333
Avdel	Hardwick Grange, Warrington	01925 811243
Sertec	Gorsey Lane , Coleshill	01675 463361
Complex Cold form	Bescot Estate, Walsall	0121 556 5700
Damason	Kingswinford	01384 400000
Millenium	West Bromwich	0121 5537 491
APS Metal	Hockley, Birmingham	0121 523 0011
AE Oscroft	Hemmins Road, Redditch	01527 502203
G Tekt	Brocksworth, Gloucester	01452 610022

If the form is left blank the location has advised Group that in the event of a disaster at site, Customer details can be accessed from the cloud at an alternative Anochrome Group location.

ANNEXE D - Suppliers Details:

Below is a list of suppliers that will require contact in the event of a disaster that would cause business disruption:

Supplier Name	Commodity:	Contact Number:
Akzo Noble	Powder Paint	(0121)5585005
Ampere UK	Zinc Anodes Sodium Cyanide	33 (0) 1 34 32 38 45
BASF	E-Coat Paint	0049 2501 143 039
Cannock Chemicals	Zinc Anodes IBC's of HCL, Caustic,Sodium Hypochlorite Caustic Bags	(01543)51762
Chemetall	E-coat Pre-treatment chemicals Zinc Phosphate Alkaline Cleaners	(01908)649333
MacDermid PLC	Zinc Anodes Passivates Brighteners Sodium Cyanide	(0121)6068100
PMD	Alkaline Cleaners Zinc Phosphate Dry to touch oil	(02476)920468
Reazn UK	Zinc Anodes	(01543)272801
Rodol	Floculant Anti Foam	(0151)2073161
Tennants	Bulk HCL, Caustic Liqour IBC's of HCL, Caustic,Sodium Hypochlorite Caustic Bags	(0121)5579571

If the form is left blank the location has advised Group that in the event of a disaster at site, supplier details can be accessed from the cloud at an alternative Anochrome Group location.

ANNEXE E: Business Interruption Analysis

This is a time sensitive, high quality business, where rapid delivery times and customer relationships are essential.

The only processes on site are zinc plating and zinc phosphating. Processing is carried out on four automatic lines.

Electro Plating

Barrel plating is carried out on either of two very similar lines working 24 hours per day, up to seven days per week. Some components require de-embrittling which is carried out in a batch oven at 200º C.

If one line were temporarily out of action, urgent jobs could still be plated by its neighbour, whilst repairs were affected. There is the facility for this work to be carried out at other group companies, or, possibly, by sub-contractors.

Consumables are widely available and replacement of these would not be a problem.

Time to replace these lines – approximately 40 weeks

Rack plating is carried out on one line, working 24 hours per day, normally seven days per week.

There is not the facility for carrying out this work at another Group site therefore parts would possibly be processed sub-contractors.

Sub-contracting Vat Zinc is a possibility – although not desirable since there is a lot of capacity in the local area and winning the work back would prove difficult.

Consumables are easily available and replacement of these would not be a problem.

The line could not easily be replaced, due to space constraints, and, it is almost certain that the floor would require extensive work to accommodate a new line.

Time to replace the line with one of comparable output – approximately 40 weeks

Phosphating

Phosphating is carried out on a barrel line, working up to 16 hours per day, normally five days per week. Some components require de-embrittling which is carried out in a batch oven at 200º C.

There is capacity at the Wolverhampton site to carry out zinc phosphating, if required. Sub-contracting is also a possibility.

Consumables are widely available, and replacement would not be a problem.

Time to replace the whole line – approximately 30 weeks.

The site would also require a four tonne de-embrittlement oven to function. Such a unit could be purchased within 6 weeks.

Effluent Plant

The effluent plant is critical for the processes operated at Anochrome Limited, since the site uses about 300 cubic metres of water per day, which must have suspended solids and metals removed, prior to disposal.

A new control panel, with the associated monitoring probes and valves could be built within one month, but, in the meantime, effluent treatment could be carried out by hand. This would, realistically, require skilled personnel available 24 hours per day. Reaction tanks are, at the present time, below ground level, but providing pumps were employed, temporary tanks of suitable dimensions, could be used for this purpose.

Time to replace the effluent plant – approximately 26 weeks.

Zinc Nickel Plating

Zinc Nickel is carried out on an automatic rack line, running up to 24 hours per day 5 – 7 days per week. Sub-contracting Zinc Nickel is a possibility – although not desirable since there is a lot of capacity in the local area and winning the work back would prove difficult.

Consumables are available from several sources, and replacement would not cause a problem.

Time to replace the whole line – approximately 30 weeks.

Electrophoretic Coating

The line is Electrophoretic coating of jigged, steel components. Cleaning phosphating and painting is accomplished in a single series of tanks, with an associated oven for drying and curing. This line is typically running 24 hours per day, six or seven days per week.

No other rack Electrophoretic process is available within the Group. There are many competitors within the West Midlands area, for this process, so sub-contracting would be practicable option if it proved necessary.

Process materials are available from two sources within the United Kingdom, and replacement of these would not cause a problem.

Time to replace the whole line – approximately 6 months.

Powder Coating

The line is an automated track loaded and unloaded manually. The parts are held on jigs that travel through a powder spray booth with an automated powder collection system. The parts are sprayed manually by trained personnel.

Parts can be processed on alternative Group sites or subcontracted.

Process materials are widely available in the UK and replacement would not cause a problem.

Time to replace the whole line – approximately 12 weeks.

ANLOLTD PUT IN THE CRITICAL MACHINES LIST IN HERE

Anochrome Technologies Limited:

ANNEXE A – BUSINESS CONTINUITY TEAM:

COMPOSITION:	TELEPHONE NO:	
	Home	**Mobile**
Chief Executive: Robert Gray	01743 232328	07973 168605
Group Managing Director: Mark Jones		07794224902
Group Project Manager: Chris Aston		07775 842621
General / Production Manager: Steve Norman	07969 537326	07980 965489

The location of the Business Continuity Team will be decided during the initial phases of the disaster.

ANNEXE B – CRISIS MANAGEMENT TEAM:

COMPOSITION:	TELEPHONE NO:	
	Home	**Mobile**
Group Managing Director: Mark Jones	01543 877457	07794 224902
Divisional General Manager: Steve Norman		07980 965489
Group Project Manager: Chris Aston		07775 842621
HSE & Technical Support Manager: Richard Chater		07583 077643
Operations Manager: Mark Smith		07368 381452
Maintenance Manager: Dave Cope		07886 857570
Secretarial Support: Josie Day	01922 404604	

The location of the Crisis Management Team will be decided during the initial phases of a disaster. If offices are not available, use a Portakabin on site where practicable. See contact details below:

Portakabin…….0121 565 4000

ANNEXE C - Customer Details:

Below is a list of suppliers that will require contact in the event of a disaster that would cause business disruption.

Customer Name	Location:	Contact Number:

If the form is left blank the location has advised Group that in the event of a disaster at site, Customer details can be accessed from the cloud at an alternative Anochrome Group location.

ANNEXE D - Suppliers Details:

Below is a list of suppliers that will require contact in the event of a disaster that would cause business disruption:

Supplier Name	Commodity:	Contact Number:

If the form is left blank the location has advised Group that in the event of a disaster at site, Supplier details can be accessed from the cloud at an alternative Anochrome Group location.

ANNEXE E – Business Interruption Analysis:

Anodising and Passivation of Aluminium

A large, automatic hard anodising line has been installed, largely for the processing of aluminium brake callipers and passivation of aluminium components to facilitate subsequent processes.

In the event of the line being unavailable, components could be sub-contracted to competitors, elsewhere in the West Midlands, but, of course, this would not be a desirable course of action.

The line also encompasses associated cleaning, etching and desmutting facilities as well as rinsing and drying.

Time to replace the line, approximately 24 weeks.

Effluent Plant

The effluent plant is important for the correct treatment of water rinses from the site, but is not as central to operations as it is at other Group companies since the volume of water used on this site is much lower. Small bulk storage tanks for chemicals to treat the effluent stream are widely available, but, in an interim period, treatment could be effected from 1000 litre portable containers,

A new control panel, with the associated monitoring probes and valves could be built within one month, but in the meantime, effluent could be treated by hand, hourly monitoring would be sufficient. Reaction tanks, at the present time, are below ground level, but treatment could be carried out in free- standing tanks of suitable dimensions.

Alternatively, it may be expedient to bulk waste waters and remove them from site for treatment.

Time to replace the effluent plant – approximately 26 weeks

Hand Spray

The hand spray line coats a variety of components that have been precleaned, in a number of different primers and top coats. This line normally operates up to 24 hours per day, seven days per week, and has associated curing facilities.

If the spray booths were temporarily out of action, work could possibly be sub-contracted to local factories with wet spray painting facilities.

The volumes of paint required at any one time are fairly low, and stocks of the material most commonly used –Xylan – are readily available within the United Kingdom. Although the paints used tend to come from single source suppliers, it is anticipated that they will have sufficient stock levels to satisfy urgent requirements for this process. Zinc flake materials are stocked at Wolverhampton Electro Plating and could be supplied, in moderate quantities to Anochrome Technologies if the need arose

Several components are cleaned using aqueous solutions which are located close to the hand spray booths. If necessary, this cleaning process could be sub-contracted, possibly to Anochrome Limited– but it would be desirable to clean components immediately prior to spray painting.

Time to replace spray booths and the associated jigs – 8 weeks.

Cleaning facilities within Anochrome Technologies – 24 weeks.

Robot Spraying

Three robot operated spray booths are available for coating large quantities of similar components or for specialist applications.

The robots are standard pieces of equipment, with two of them being interchangeable and could be replaced rapidly. Copies of robot programmes are stored off site, so they are available in case of emergency.

Time to replace robots, spray booths, jigs and make the necessary adjustments – approximately 10 weeks.

Automatic Spraying

An automatic spray line with a robot, drying, curing and cooling stages served by a conveyor is available for painting large batches of one type of component.

The robot is a standard piece of equipment and could be replaced fairly rapidly. Copies of robot programmes are stored off site so they are available in case of emergency.

The conveyor system, drying, curing and cooling stages are bespoke and a new line would have to be built (in the event of substantial loss) to replace the facility.

Time to replace and then make the necessary adjustments – approximately 30 weeks.

Thermal Diffusion

This line consists of a series of retorts, a high temperature oven and associated handling facilities. At the time of writing, pre-treatment and post treatments were being carried out off-site.

It may be possible to subcontract urgent orders to an in-house company, but there are no subcontract licensees of this system in the United Kingdom.

Time to replace the equipment – approximately 26 weeks

ANOTEC PUT IN THE CRITICAL MACHINES LIST IN HERE

Wolverhampton Electroplating Limited:

ANNEXE A – BUSINESS CONTINUITY TEAM:

COMPOSITION:	TELEPHONE NO:	
	Home	Mobile
Chief Executive: Robert Gray	**01743 232328**	**07973 168605**
Group Managing Director: Mark Jones		**07794 224902**
Group Project Manager: Chris Aston		**07775 842621**
General Manager: Denis Rainbird		**07966 040605**
Operations Manager : Andy Bate		**07583 077645**

The location of the Business Continuity Team will be decided during the initial phases of the disaster.

ANNEXE B – CRISIS MANAGEMENT TEAM:

COMPOSITION:	TELEPHONE NO:	
		Mobile
General Manager: Denis Rainbird		**07966 040605**
Group Project Manager / Maintenance: Chris Aston		**07775 842621**
HSE & Technical Support Manager: Richard Chater		**07583 077643**
Secretarial Support : Nigel Ingram	**01902 397333**	
Operations Manager : Andy Bate		**07583 077645**

The location of the Crisis Management Team will be decided during the initial phases of a disaster. If offices are not available, use a Portakabin on site where practicable. See contact details below:

Portakabin…….0121 565 4000.

ANNEXE C - Customer Details:

Below is a list of suppliers that will require contact in the event of a disaster that would cause business disruption.

Customer Name	Location:	Contact Number:

If the form is left blank the location has advised Group that in the event of a disaster at site, Customer details can be accessed from the cloud at an alternative Anochrome Group location.

ANNEXE D - Suppliers Details:

Below is a list of suppliers that will require contact in the event of a disaster that would cause business disruption:

Supplier Name	Commodity:	Contact Number:

If the form is left blank the location has advised Group that in the event of a disaster at site,

Supplier details can be accessed from the cloud at an alternative Anochrome Group location.

ANNEXE E – Business Interruption Analysis:

This is a time sensitive, high quality business where rapid delivery times and customer relationships are essential.
The main activity on site is contract metal plating, paint finishing and fastener sealant and adhesive application.

Electro Plating

Zinc and Zinc Nickel plating is carried out on two lines working up to seven days a week on shift basis. Plating may form part of a duplex process and some parts may need to be de-embrittled. If one line was temporarily lost, urgent jobs could still be service whilst repair was affected. There is the facility for this work to be carried out at other group sites or by sub-contract arrangements. Consumables are non-specialist and replacement would cause minimal problems. Zinc plating is available at Anochrome Limited, Zinc Nickel would have to be subcontracted to a competitor.

Time to replace both lines – approximately 40 weeks.

Dip Spin Coating Finish

Three Dip spin coating lines are available for applying various finishes, the majority of which are supplied under licence. The processes include Delta, Geomet, Magni and Xylan applications.

Processes would have to be sub-contracted to local competitors, who already carry out some of these processes, using similar equipment, in the short term. There is also the facility to subcontract all coatings to Anocote, Czech Republic or Anocote, Poland if required.

There are no alternative suppliers for each product, though it would be possible to substitute an alternative if the customer accepted the change. Back up stocks of paint on site are limited to two weeks normally. Back up stocks at distributors are thought to be limited to three or four weeks in total, but material could be rapidly obtained from manufactures if required. All suppliers have more than one production site available and could switch manufacture of materials for the Anochrome Group, and other consumers, to alternative facilities if needed.

Time to replace these lines – approximately 26 weeks.

Mechanical Plating

This is a specialist line with no duplication within the Group. There are alternative finishes, which could be offered to customers. The process is used as a base for certain other processes on site, so failure has potential knock on effects. In an emergency, non-purpose built inclined barrels could be employed to carry out this process.

Plant will be difficult to replace due to the nature of the barrel used. A spare barrel is kept on site. It will take approximately 12 weeks to replace the line at present dependent on what second hand equipment is available.

Cleaning Plant

An alkaline cleaning plant, which services the other lines on site, is available, as are three shot blasting units. There are a number of in-house or sub-contractor options available to complete this process.

Time to replace this facility – approximately 26 weeks.

Phosphate Line

A stand-alone process line akin to electro-plating. There are a number of in-house or sub-contractor alternatives available.

The line supports the dip spin lines in processing components that are unsuitable for shot blasting.

Time to replace this line – approximately 30 weeks.

Induction Hardening

Three machines are in use covering different products due to size capacity. Each machine has its own generator and these require chillers. Drawings are held on site and at the manufacturer's premises. This process services other processes in the plant. The machines are purpose built so outsourcing may be possible after negotiation.

Time to replace this equipment – approximately 20 weeks

There is dependency on utilities. Gas is used for drying and is supplied from a single supply meter. Water is drawn from a bore hole and town mains. Electricity is supplied by two main legs into the site at different points. Compressed air is generated on three compressor sets plus a portable compressor.

Testing Equipment

In the event that there is a failure with testing equipment, alternative testing equipment for thicknesses and alloy composition and corrosion resistance is available at Anochrome Limited. If friction coefficients need to be determined, and both machines at Wolverhampton were unavailable, the help of customers would need to be enlisted. In the medium term loan equipment could be obtained from suppliers.

WEP TO ADD CRITICAL MACHINES LIST HERE

ANNEXE F - Insurance Brokers

Insurance brokers to be immediately notified of any incident. They will then liaise with Insurers and Loss Adjusters to commence claim formulation, interim payments, and damage limitation and salvage operations as necessary.
Ensure that contact details for each appropriate team member is provided.

Contact details are:

Arthur J. Gallagher Insurance Brokers
13th Floor
103 Colmore Row
Birmingham
B3 3AG

Tel: 0121 606 0660
Fax: 0121 606 0661

www.ajg.com/uk

ANNEXE G - Financiers

Arrangements may be required for emergency financial provision in the immediate aftermath of an incident to procure essential items of equipment.

Authority and approval for emergency finance acquisition must be provided by Chief Executive or Financial Director.

ANNEXE H - All Staff Notice

ALL STAFF NOTICE

EXAMPLE

To all Staff

Some of you may have heard about the incident (venue) involving (brief description of problem). This incident is being dealt with as a matter of urgency by the Business Recovery Team headed by *(name)* with the support of our experts within the plant.

However, you have a right to be informed of any incident, which affects this company, so this is to advise you or the situation as it currently stands.

(Brief outline of incident and action being take - if possible a statement of reassurance.)

You may be asked about this outside work, but I remind you that it is strict company policy that no member of staff may discuss such matters with anyone. This is to protect the reputation of the company and all employees from damage that may be caused through incorrect information of supposition. More importantly, it is to protect the people handling the situation from wasting precious time having to respond to incorrect information.

As soon as we have more information you will be informed.

Should you receive genuine queries from outside the company please refer them directly to *(name).*

Thank you for your co-operation and support.

Signed:

Date: Time:

For distribution to:

Media Communications

MEDIA HANDLING GUIDANCE NOTES

The Chief Executive will decide who will deal with the media. In his absence the Financial Director will decide.

The appropriate site director will normally be responsible for dealing with the local media, after referral to the Chief Executive or in his absence the Financial Director.

For the Nominated Spokesperson Only

MEDIA CALLS

Be courteous and calm, even if the journalist is difficult - they may want an emotional or angry response to make you seem uncaring or hostile. Stick to the pre-agreed contents of the media statement(s) - use these as guides, do not simply read them.

Do not be cajoled, irritated or outraged into saying or conjecturing anything else about the incident.

Do not speak “off the record” and assume it will be treated as such - some journalists do not respect this protocol. Assume you will be quoted on every word.

Show concern but confidence over the incident and underline that everything is being done to bring an early resolution, with minimal impact and the company’s first priority is the protection of the public and all employees, suppliers as well as the protection of the environment.

Sound business-like and efficient, concerned but not worried. Do not lie or prevaricate. Do not joke as this could be taken out of context.

Show confidence in the experts who are dealing with the recovery situation - even if you have some concerns. The key is to show the public and the media a confident front.

If you do not have the answer to a question do not guess. Say you do not have the information but will get it from the person who does know, and you will call back - and do so. If you cannot quickly get the answer, call the journalist and tell him/her that you are still looking for the information. It is vital that journalists think they can trust you and believe that you are trying to be helpful and not obstructive.

Keep conversations brief and factual.

Keep the media informed whenever possible - release briefing statements to all media and give the same information.

MEDIA INTERVIEWS

Be prepared with what you want to say - write it out in advance and learn the key points.

Do Not

- Do not take notes into the interview unless there is a lot of factual or numerical data, which you need to use but could not sensibly memorise.
- Do not act like a politician and only answer a question with points you wish to make. This antagonises the journalist and sounds to the public as if you have something to hide.
- Try to apportion blame.
- Discuss costs or recompense.
- Worry about questions to which you have no answers.

Do

- Keep calm, show concern, but do not worry.
- Be as honest as possible within the agreed messages you can give.
- Be friendly and reasonable even if the journalist is not.
- Remember why you are there - to give reassurance and vital information to the public and to show that you are a caring company and doing everything you can to achieve a satisfactory resolution of the problem.

Door stepping

If media turn up at the site uninvited and unannounced, say that you have supplied all the available information to their paper/programme and offer them a further copy of the statement.

If they insist on trying to film or interview, never get angry or threatening - show regret that you have nothing further to tell them, underline your concerns about the incident, but that you are needed inside to try and help resolve it. Say that as soon as you have any more information you will contact them at once.

ANNEXE I - MEDIA HANDLING STATEMENT

EXAMPLE

(Statement only to be used in response to queries - not proactively sent out)

(Company Name) and (Incident)

(Company Name) confirms that there has been an incident at the (site) involving xxxxxx.

Our first information is that (note where possible - there are no fatalities/serious injuries/environmental damage etc). While this is not a major incident (tailor as relevant) the emergency services and our incident-handling experts are on the scene to ensure the continued safety of the public and to resolve the problem as soon as possible.

(Company Name) has in place systems to deal with such incidents and these have immediately been put into action.

At this stage, we have only an initial report and are undertaking a full investigation into the causes behind the incident.

As soon as we have a fuller picture we will issue a further news bulletin.

Ends

Date Time

Information will be supplied by Name

Title

Telephone

Section 5

Supply Interruption

If it appears that it will no longer be possible to obtain a particular product that is required to meet customer's specifications, due to the insolvency of a supplier or a supplier deciding that it is no longer viable to make a certain product, the Technical Manager shall be informed.

The Technical Manager, taking such advice as may be necessary shall determine whether materials can be obtained that will meet the on-going business needs of customers.

For example, if it is necessary to change the supplier of cleaning materials and certain addition agents this can normally be accomplished without affecting product quality.

If, however it is no longer possible to obtain a proprietary product that is customer or end-user specified, the Technical Manager, or nominated deputy shall inform all customers affected to discuss the use of alternative materials.

Where necessary, concessions must be sought and product revalidation carried out. Process routes and certification must reflect any changes to previous practice as soon as these changes occur.

Utility Interruption

If there is a disruption in the supply of water, gas or electricity, shut down procedures are in place to preserve product quality.

In the event of electrical failure, components cannot be removed from process tanks, although solution levels can be reduced to avoid deterioration of components by prolonged contact.

If a supply interruption of more than 24 hours occurred, it would be possible to process customers' products at alternative sites within the Anochrome Group for certain finishes.

Large Volume of Work Requiring Reprocessing

If a large quality of components required reprocessing, due to specification conformance issues, which is a very remote contingency then extended working hours would be arranged to allow the defective components to be processed in an expedient manner.

Personnel Being Unavailable

If significant numbers of personnel on one site were unavailable for any reason i.e. due to illness, accident, pandemic or industrial action then members of the Management Team from another site would be able to run critical processes and support the business remotely. If personnel carrying out relatively low, skilled jobs such as, washing, machine loading or jigging were unavailable, then the Group has a good relationship with several agencies who would be able to supply labour within a few hours of being requested to do so.

Flood

None of the sites in the West Midlands is in a flood plain, the possibility of flooding is remote.

Fire

A serious fire within any of the Group Companies would, of course, jeopardise production capabilities. Customer Services shall inform customers should such a contingency occur.

Vehicle Impact

In the event of a vehicle impact causing structural damage to buildings or equipment it is unlikely that production would be significantly compromised due to the layout of the premises; production equipment is located at a significant distance from the road, and heavy goods vehicles on site are speed limited.

Plant Breakdown (including failure of effluent treatment)

The Group carries out planned preventative maintenance programs, keeps an inventory of critical spares and has 24 hour access to most equipment suppliers. If process solutions are compromised due to contamination these can be changed quickly, sufficient process materials are kept on site so that changes can take place within a few hours.

In the event of a leak in a process tank or bulk reagent tank, safe draining, repair and replenishment can be time consuming – however it is unlikely that processing components would be sufficiently delayed to require off-site transfer to meet customer requirements. Customer Services shall inform customers should such a contingency occur.

Measuring Equipment Failure

Most measuring equipment is duplicated between the sites, or other items, for example, torque wrenches are easily obtainable. In certain cases equipment could be borrowed from suppliers or components could be sent to suppliers or customers for testing. The Quality Manager / Engineer shall inform customers should such a contingency occur.

In the event of processing customers' components having to be sub-contracted to competitors the Anochrome Group shall carry out such measurements as is necessary to validate the coatings or other processes carried out by other companies.

Re-start of production following and Emergency

After restarting production following an emergency parts are to be tested in line with the relevant control plans to ensure product supplied conforms to specification requirements.

If parts were not removed from the process via the regular shutdown procedure the plant breakdown procedures are to be followed.

Validation of processes if components processed off-site if normal production facilities are not available.

If it is necessary to subcontract processing of components to competitors, finished parts shall be returned to one of the Anochrome Group Companies for visual assessment, thickness measurements, coefficient of friction tests and any other validation which needs to be conducted before the components are sent on to customers. Certificates of conformity, however, will be issued by the subcontract company.

Traffic Problems (traffic jam, vehicle breakdown)

The majority of parts processed by the Group are ex works therefore it is the responsibility of customers' logistics teams to take action in the event of significant traffic situations or vehicle breakdown. Where the Anochrome Group do provide a collection and delivery service this is via external carriers. Each lorry is equipped with tracking equipment and the drivers are contactable via mobile phones should such an event occur the carrier will be contacted and will if necessary provide an alternative vehicle or offer an alternative route.

Bad Weather Conditions

All customer parts are processed inside therefore weather conditions have very little impact on the processing of product. Prolonged periods of extreme cold weather can cause pipes carrying water to freeze and burst, therefore vulnerable pipework is fitted with trace heating.

In the event of severe weather resulting in significant numbers of personnel not being able to get into work please see the comments relating to Personnel Being Unavailable.

Vandalism or Act of Terrorism including cyber-attack.

In the event of a cyber-attack affecting IT systems, both UBS and Acton Gate will be contacted, back-ups are taken so the systems can be restored to a point in time before the cyber-attack took place. The IT systems are supported with comprehensive hardware firewalls which include deep packet inspection and advanced threat protection.

The back up servers can be returned to full operation within a 2-4 hour timeframe.

Full details available in the Group Cyber Resilience document – UBS.

In the unlikely event of an act of terrorism taking place at one of the sites causing significant damage to the infrastructure and coating lines then the relevant sections of this plan (potentially all of section 5) will be initiated as appropriate.

Section 6: Useful Telephone Numbers

Service type:	Organisation:		Contact Telephone Number:
Electricity	N Power	CEC 01737 559169	0345 331331
Gas	Regent Gas	CEC 01737 559169	0845 2412700
Water	Severn Trent		0800 7834444
Environmental Agency			0151 922 9235 (24Hrs)
			0845 3009923 (Working Hrs)
Tankers	Veolia Environmental		01902 294944

Section 7: Controlled Copies Locations

No	Owner	Location	Date
01	Chief Executive	Chief Executive Office	Reviewed and updated Sept-23
02	Group Engineering Manager	Group Engineering Mgr Office	Reviewed and updated Sept-23
03	Wolverhampton Site	Reception	Reviewed and updated Sept-23
04	Anochrome Ltd	Reception	Reviewed and updated Sept-23
05	Anochrome Technologies Ltd	General Office	Reviewed and updated Sept-23
06	Inlex Ltd	General Office	Reviewed and updated Sept-23

Section 8: Change and Review Record

Issue Date:	Details of Change(s):	Author:	Released Date:	Review Due:
2018	Added Traffic problems, Bad Weather conditions, Vandalism or act of terrorism.	R Sedgewick	Nove 2018	Aug 2019
Aug 2019	Review only no changes	R Sedgewick	Aug 2019	Aug 2020
Aug 2020	Review only no changes	D Wheatley	Aug 2020	Aug 2021
Aug 2021	Review only no changes	D Wheatley	Aug 2021	Aug 2022
Aug 2022	Review only no changes	D Wheatley	Aug 2022	Aug 2023
31/08/2023	Changed format to one document for all, changed doc text pitch, Added Group Logo, record of change, contents section, and individual site details and Controlled Copies Location list, added comment regarding Cloud based data for customer and supplier files. Removed Invoice and Expenses form. Added Gas supplier to Regent. Updated Insurance broker contact details.	S Guilmant		Aug 2024