

QUALITY, ENVIRONMENTAL & HEALTH & SAFETY MANAGEMENT SYSTEM

ISO9001:2015, ISO14001:2015 & ISO45001:2018

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MANUAL DISTRIBUTION LIST

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SHEQ5					

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COMPANY FORWARD

This Manual is the means by which Sui Generis International Ltd satisfies the requirements of its customers, particularly with regard to management responsibility.

The Company is obliged to ensure that its Quality, Environmental and Health and Safety Management System (SHEQ) Policies are understood by its employees, and that its procedures are implemented and maintained at all times. This Manual is in accordance with the requirements of ISO9001:2015, ISO14001:2015 and ISO45001:2018. The SHEQ shall be periodically and systematically reviewed by management and checked by audits both internal and external.

The SHEQ Compliance Manager is responsible for the control of all matters pertaining to the implementation of procedures for quality and environmental matters.

Quality and environmental matters and concerns are fundamental to all the work undertaken by the Company and all personnel at every level in the Company's structure shall practice the procedures established.

POLICY STATEMENT

SUI GENERIS INTERNATIONAL, manufacturers and installers of glass reinforced plastic (GRP) products and operators of surface preparation and coating activities, are a trading company with competition throughout the UK and Europe. It is the customer that keeps us all employed and the need to achieve customer confidence and complete satisfaction through our business activities is paramount. To that end we are committed to complying with quality and environmental requirements arising from our customers and from current legislation.

We require all personnel, employed in whatever capacity, to work to the procedures and instructions contained within the documented quality and environmental management system. By periodically monitoring and reviewing these systems through internal and external auditing as well as management review we will ensure that our customers' needs and expectations are focused upon and there will be a continual improvement in the quality and environmental management system.

It is the responsibility of top management to establish objectives and targets for both the quality and environmental management systems and to ensure that adequate resources are made available to sustain and improve the skills of the workforce through suitable training. It will also be our responsibility to communicate this policy throughout the organization and to make sure that it is clearly understood and fully implemented. We will also make this policy available to suppliers, subcontractors, customers and the general public.

Every employee is committed to working to the instruction framed within the company quality and environmental management system which has been drawn up in accordance with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 ensuring that they are fully implemented. This includes the need to maintain clear lines of communication with our customers and between ourselves at all times.

As part of our commitment to understanding and effectively managing the potential environmental impact of our activities we will:

1. Minimise and where reasonably practical eliminate any adverse impact on the environment.
2. Minimise the use of energy, resources and waste produced, in a safe manner.
3. Encourage the reuse and recycling of materials and ensure appropriate disposal of all waste.
4. Control Pollution through regular servicing of our vehicles, machinery and continual evaluation of our manufacturing practices.

We are determined that by implementing this policy and focusing on customer needs and the environment we all share, the name of SUI GENERIS INTERNATIONAL will be synonymous with good practices across the industrial, commercial and domestic markets in which we are involved.

Director

3rd March 2026

HEALTH AND SAFETY POLICY STATEMENT

Sui Generis International recognises our duties under the Health and Safety and Work etc. Act 1974 and the accompanying protective legislation. We will endeavour to meet the requirements of this legislation so as to ensure that we maintain a safe and healthy working environment. We are committed to the prevention of injury and ill health and this policy is communicated to all staff to ensure they are aware of their responsibilities and take all reasonable precautions to ensure the safety, health and welfare of those that are likely to be affected by our undertaking.

Sui Generis International recognises, so far as is reasonably practical, the responsibility to ensure the following:

- We provide and maintain a safe place of work, safe systems of work, safe equipment and a healthy and safe working environment
- All such necessary information, instruction, training and supervision are provided to ensure the health and safety at work of all employees
- We will ensure we have access to competent Health and Safety advice, so we are aware of legislative changes
- We safeguard the Health, Safety and Welfare of visitors and members of the general public who could be affected by our activities
- We ensure that hazards are identified, and regular assessments of risks are undertaken
- All necessary human and financial resources are provided to ensure that the contents of this policy statement can be implemented.
- We are committed to the consultation and participation of all our workers, and workers' representatives where applicable.

At a minimum we will comply with all relevant legislation, customer or other identified requirements. However, we strive for continual improvement in the area of Health and Safety management and performance.

This policy provides a framework for the setting and reviewing of the company's Health and Safety objectives, is communicated to all employees and is available to interested parties on request.

The systems defined have our active full support. They are under continual review and improvement, however once defined are mandatory for all personnel.

This policy will be reviewed and updated as necessary, particularly in respect of major changes within the company and/or changes in legislation and we will bring these changes to the attention of all employees.

Director
3rd March 2026

4.1 Understanding the Organisation and its Context

Sui Generis has determined the external and internal issues that are relevant to its purpose and strategic direction and that affect its ability to achieve the intended results of its SHEQ Management System.

This has been accomplished through a SWOT and PESTLE analysis as prepared during Top Management meetings. The results of these meetings are incorporated into the current Business Plan.

These results will be continuously monitored through the process of Management Review and minutes will be taken and retained by the SHEQ Compliance Manager.

4.2 Understanding the Needs and Expectations of Interested Parties

Sui Generis has identified the interested parties who are relevant to the company and potentially may have an impact, either positively or negatively, upon the company's ability to maintain all aspects of the Quality, Environmental and Health and Safety Management System (SHEQ). This includes the ability of the company to provide products and services that meet customer expectations and manage all aspects of the company's environmental impact.

The results are recorded in the Minutes of Management Review Meetings and the current Risk Matrix, which is reviewed and updated regularly following these meetings.

4.3 Determining the scope of the management system

The Company has defined, documented, implemented and will continually improve a SHEQ relevant to customer expectations and needs, and is designed to show how the requirements of ISO 9001:2015, ISO 14001:2015 and ISO45001:2018 are satisfied by Sui Generis International Ltd.

The scope of the SHEQ is designed to cover the company's activities in the supply and manufacture of Glass Reinforced Plastic (GRP) products in our Colchester factory and surface preparation and coating activities carried out on various sites throughout the UK. The range of our GRP products is clearly shown on the company website.

The Quality and Environmental Policy and Health and Safety Policy Statements contained within this manual indicates that we aim to *achieve "customer confidence and complete satisfaction through our business activities is paramount. To that end we are committed to complying with quality and environmental requirements arising from our customers and from current legislation."*

The Quality, Environmental and Health and Safety objectives are established regularly at Management Review (Refer to Section 9.3).

All clauses are applicable to the above scope except 8.3 (Design and development of products and services). This is because we do not design our products and services but respond to the information we receive from our clients.

The internal and external issues referred to in 4.1 and the interested parties shown in 4.2 have been taken into consideration when thinking about the scope of this SHEQ.

4.4 Management System and its processes

The Company has established, implemented and maintains and continually improves its SHEQ, including the processes needed and their interactions. The sheq is designed to show how the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 are satisfied by Sui Generis International Ltd.

The Company's organisation is structured to ensure that the responsibilities and authority of all personnel whose activities affect Quality and Environmental matters are defined. Personnel having particular responsibilities have roles which are defined to allow them the authority and freedom to carry out their duties described in the standards.

We have allocated resources and trained specific personnel to identify and undertake quality and environmental internal audit activities.

The required processes have been determined and through our audits and inspections we will ensure the planned process operation is in line with the actual operation.

The Managing Director has appointed a SHEQ Compliance Manager from the management who, irrespective of other responsibilities, has the authority and responsibility to ensure that the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 are implemented and maintained.

The SHEQ described in this Manual and detailed in the Procedures will be reviewed at least every twelve months. The reviews will be undertaken at the Management Review Meeting chaired by the Managing Director and attended by other members of the Management teams as appropriate.

The reviews will include amongst other things results of and actions arising from the internal audit activities. We will consider all the knowledge gained from analyzing the external and internal issues and the requirements of the interested parties.

Minutes of the meetings will be taken and retained for a minimum period of three years.

5.1 Leadership and commitment

The Company is aware of the importance of meeting customer, statutory and regulatory requirements, applicable to its products and services, and will demonstrate leadership and commitment in assuming accountability for the effectiveness of this Management system.

Top Management has established policies and objectives in line with the company's business plan through regular review meetings. The ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 requirements have been integrated into the organisations processes and are maintained through a regular auditing schedule.

Top management ensures the company demonstrates customer focus by means of:

- a) A system of continual contact with the customer from the initial enquiry throughout the various stages of manufacture through to final completion.
- b) Full resolution with the client of any real or potential problems and site surveys undertaken to ensure full compliance with customer's requirements.
- c) Documented evidence of customer sign-off on completion of site work

Top management will undertake the following:

- a) Accountability for the effectiveness of the SHEQ as undertaken in the statement above.
- b) Promote the use of the process approach and risk-based thinking
- c) Commit to engaging, directing and supporting persons to contribute to the effectiveness of the quality and environmental management system
- d) Promote improvement
- e) Support other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility
- f) To communicate the importance of effective quality and environmental management and of conforming to the management requirements through training sessions, toolbox talks and memos used to ensure that its objectives are understood, applied and achieved.

Top management will assign the following tasks to others for completion and confirm that the task has been completed:

- a) Ensuring that the quality and environmental policy and its objectives are established for the SHEQ and are compatible with the context and strategic direction of the organisation through its regular review meetings. This includes any SHEQ objectives that occur in the Business Plan, particularly when new products are being developed.
- b) Ensuring the integration of the SHEQ requirements into the organisation's business processes through a regular auditing schedule.
- c) Ensuring that the resources needed for the SHEQ are available.
- d) Ensuring that the SHEQ achieves its intended results.

5.2 Quality, Environmental and Health and Safety Policies

Sui Generis' Quality, Environmental and Health and Safety Policies are contained in the introduction to this SHEQ.

- The policies have been established to meet the needs of both the company and its customers
- Full commitment to meeting requirements and continual improvements are clearly defined

- The system is monitored and controlled by means of quality and environmental system audits carried out on a regular basis
- All personnel have been given a copy of the company policy document and made aware of their role in its implementation
- Management reviews are carried out in accordance with the general requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.
- The Quality, Environmental and Health and Safety policies are the primary statements by which we can communicate our intentions with regard to quality, environmental and health and safety management.
- They provides a framework that can be used to set realistic objectives and targets with the goal of continually improving our environment.
- Top management is involved in the creation, development, review and updating of the policy at all stages.
- The Company's significant environmental impacts have been identified following an initial environmental review and recording of the significant findings along with pertinent legislative requirements.
- The nature and scale of our business activities have been considered during the preparation of our policy and its scope is sufficient to cover all of the aspects that require auditing to ensure compliance with the ISO 9001, ISO 14001 and ISO 45001 standards.
- The policy reflects commitment to continual improvement in quality, environmental and health and safety performance.
- The policies confirm commitment to compliance with all relevant legislation, regulations and codes of practice that affect our business.
- The policies are freely available to all interested parties, both inside and outside of our company.

5.3 Organisational roles, responsibilities and authorities

The responsibilities and authority of all personnel are defined by means of written Job Descriptions and their inter-relationships by the Company Organisation Chart.

The company has gained the commitment of all of its employees towards the implementation of the SHEQ.

Management Representative

The management representative with defined responsibility for the implementation and maintenance of the SHEQ is the SHEQ Compliance Manager, who reports directly to the Managing Director and is also responsible for promoting the awareness of customer requirements throughout the organization through the order processing/job card system.

The SHEQ Compliance Manager is a member of and reports to top management on the performance of the SHEQ and any need for improvement, normally at Management Review and has sufficient knowledge of the activities of the organisation and of environmental issues to undertake the role effectively.

The SHEQ Compliance Manager is able to secure support and resources as well as influence the activities of all employees within the management system to ensure continued compliance.

He/she co-ordinates the progress of the system against the requirements of the standards, whilst ensuring that Top Management is kept informed with regards to the quality and environmental performance.

Specific responsibilities of the representative are:

1. Maintaining a Register of Environmental Aspects:
Identifying key significant processes and activities that need clearly defined roles and responsibilities to ensure continued management control.
2. Assessment of Legislative Requirements
Identifying key areas that require monitoring and control and hence the establishment of detailed roles and responsibilities.
3. Key quality, environmental and health and safety issues are addressed.
4. Monitoring management issues identified including:
 - Emergency planning.
 - Waste management.
 - Environmental monitoring.
 - Quality and environmental management audits.
 - Visual impact of site activities.
 - Resource reduction programmes.
 - Publicity and complaints.
 - Procurement.
 - Liaison with the local authorities.

Defining Roles and Responsibility

All employees have been made aware of their responsibility for achieving conformance with the SHEQ policy and the requirements of the SHEQ. These responsibilities have been communicated to all employees through the work induction policy.

Provision of Resources

The company has provided sufficient resources for the implementation and control of the SHEQ.
The types of resources that had to be considered were:

- Human Resources
The staffing levels, experience, qualifications and availability to work on quality, environmental and health and safety matters are deemed adequate to establishing and maintaining our SHEQ.
- Specialised Skills
The company has access to specific specialised skills (e.g. trained quality, environmental and health and safety auditors) that are required to ensure the continued operation of the SHEQ and the significant processes and activities.
- Technological Resources
The most appropriate technology available for ensuring the objectives and targets set by the organisation are met.
- Financial Resources
The quality and environmental needs are given the same consideration as other business requirements.

5.4 Consultation and Participation of Workers

Communication with our staff and clients is important to the operational running of our company. We have established a procedure for Consultation and established Responsibilities under the Management System. Consultation is applicable at all levels and functions, (including workers' representatives) in the development, planning, implementation, performance evaluation and actions for improvement of the Management System.

To aid the process (and where appropriate) regular meetings of managers and staff are held in order to discuss issues arising within the company that may include:

- Employees
- Local community
- Legal requirements
- Waste
- Energy and Raw Materials
- Suppliers and Sub-Contractors
- Procurement

Minutes of these meetings are kept.

Communication methods include but not limited to:

- Notice Boards
- Memos
- Emails
- Verbal
- Web
- Toolbox talks

6.1 Actions to Address Risks and Opportunities

6.1.1 General

The Company has addressed the issues, requirements, risks and opportunities to:

- ensure that the SHEQ can achieve its intended result
- maximize opportunities for good outcomes
- remove or reduce undesirable effects of identified risks
- achieve improvement

This is done by regular Management Review in which clear objectives are set and the various impacts the business makes are addressed.

The current Risk Matrix records the results of each review and enables assessment to be made on progress or need for improvement.

6.1.2 Environmental Aspects

The Company has established systems to identify and assess its environmental aspects and impacts associated with its processes, activities and services. During audits the system is thoroughly tested to ensure that it is sufficiently detailed to enable the company to identify those aspects that could have a significant impact upon the environment.

Scope:

The scope of this covers all activities, products and services that the company can control and over which it can be expected to have an influence.

Most direct impacts (i.e. those occurring from activities / processes on the site) are well within the control of the company and as such are included in the aspects evaluation.

Site Activities and Processes:

The types of environmental aspects that are considered when setting the scope of the Register of Significant Impacts:

Environmental Aspect

- Emissions to air
- Waste management and disposal
- Land contamination issues
- Raw material use
- Releases to water
- Local community issues
- Utility use (energy, water etc.)

The company considered the following types of activity when setting the scope of the Register of Significant Aspects.

Activities and Processes

- Production processes and factory
- Storage of raw materials
- Logistics
- Procurement and suppliers
- PR and communications
- Building and site management
- Office and computer facilities
- Contractor activities
- Storage of waste materials
- Site emergency planning
- Financial and insurance
- Management activities

Environmental Significance:

The company has collected information about the environmental aspects affecting the business and has determined which activities are environmentally significant. They may be either

Local Impacts:

- Surface water pollution
- Groundwater pollution
- Air pollution
- Nuisance impacts
- Health effects

Or Global Impacts:

- Climate change
- Ozone depletion
- Acid rain
- Resource depletion
- Health effects

Not all impacts will be significant, and some may be beyond the scope of the business to affect. It is only those that are significant and can be controlled that need to be addressed and have objectives. The procedure 4.4 Env - Aspects and Impacts outlines how the Register of Environmental Aspects is produced. Abnormal and Emergency conditions are also taken into account when making the assessment.

6.1.4 Hazard Identification and Risk Assessment (ISO45001)

We have a social and legal responsibility to the environment and for the health and safety of:

- Our staff
- Visitors and sub-contractors to our premises and sites of works
- The general public who may be affected by our operations.

In addition to compliance with appropriate Environmental and Health and Safety legislation – see 6.1.3 – we have assessed workplace and work-associated risks and where appropriate, applied controls to mitigate these to acceptable levels.

Risks	Controls
Physical – e.g. safety of equipment, premises	Risk Assessments
Work environment, e.g. layout of offices	Communication and training
Competence – e.g. training for use of machinery	Testing of scenarios, e.g. Fire drills
Human behaviour, e.g. attention lapses	CoSHH Register
Hazardous materials	PPE
	Signage
	First aid kit
	Fire management, eg. extinguishers, sensors
	Policies, e.g. driving at work, lone working

6.1.3 Compliance Obligations

The standard requires that the Company shall identify and have access to legal and other requirements that are applicable to the environmental and Health and Safety aspects of its activities, products or services.

This includes:

- International and National statutes and regulations.
- Requirements specified in permits and other government documents and agreements.
- Contracts and other documents that may create legal obligations

- Requirements applicable to each of its environmental aspects.
- Acts, Regulations and Orders.
- Site authorisations and permits.
- EU Regulations and Directives.
- International Agreements and Protocols.

In order for the procedure to be maintained the SHEQ Compliance Manager has been nominated and is responsible for overseeing the implementation, reviewing, updating and communication of the legislative requirements so that the company is aware of its responsibilities.

6.1.4 Planning Action

The Company identified significant environmental aspects and associated risks and opportunities and these are recorded in the Register of Aspects and Impacts. This is considered in the Management Review process during regular Top Management meetings and any required actions or strategies are recorded in the minutes as well as some actions being inserted into the Register of Objectives and Targets with defined periods of time for implementation.

6.2 Quality & Environmental Objectives and Planning to Achieve Them

6.2.1 Quality Objectives, Targets & Programme

Quality objectives are established regularly within the Management Review. These objectives are measurable as far as practicable and progress is monitored at management meetings.

6.2.1 Environmental Objectives, Targets & Programme

The setting of objectives is the main way an organisation can manage its way towards improving its environmental performance.

These environmental goals generally should be realistically achievable with the aim of complying with the organisation's policy statement.

To ensure the company's policy and objectives are achieved, targets for improvement have been established.

Results are recorded on SG-OTP-01.

6.2.1 Health and Safety Objectives, Targets & Programme

The setting of objectives is the main way an organisation can manage its way towards improving its health and safety performance.

The Health and Safety goals generally should be realistically achievable with the aim of complying with the organisations policy statement

The ensure the company's policy and objectives are achieved, targets for improvement have been established.

Results are recorded on SG-OTP-01.

Establishing Objectives and Targets

The company has established documented quality, environmental and health and safety objectives and targets

and these will be reviewed yearly at the Management Review.

The following was considered when setting objectives and targets:

- Legal and Other Requirements
- Significant Aspects
- Health and Safety requirements
- Technological Options
- Operational Options
- Financial, Operational and Business Requirements
- Interested Parties
- Health and Safety Executive
- Environment Agency.
- Company Policy Statements

Following the evaluation of the environmental aspects and the requirements of the quality, environmental and health and safety policies the company has identified some objectives based on its most significant quality, environmental and health and safety requirements, environmental aspects and legal requirements. Where objectives are relevant to business areas the manager of the area will establish targets and action plans to ensure they are met.

Achievement of the targets is monitored by the SHEQ Compliance Manager on a regular basis to ensure acceptable progress against the stated business action plan.

Setting targets for improvement

The next stage is to set detailed performance requirements to ensure that the company's objectives are met.

Reviewing Progress Against the Objectives and Targets

In order that continual improvement is achieved, the SHEQ Compliance Manager monitors objectives and targets regularly. Objectives and their progress is reported at Management Review Meetings.

Programme

The process of establishing an quality, environmental and health and safety management programme is the main way in which SHEQ improvements can be delivered. A programme should describe how an organisation plans to achieve its SHEQ objectives and targets.

Type of Programme

The company has established and documented a programme that states how it intends to fulfill its environmental objectives and targets and follows the basic steps as follows:

1. Problem identified following SHEQ evaluation
2. Objective set
3. Target put in place
4. Responsibility identified
5. Programme implemented
6. Performance reviewed

The programme will clearly state who is responsible for achieving each objective and target, how it will be achieved and by when.

6.3 Planning of changes

Planning is achieved in product specifications (job card), the estimating process and business plans. The latter are reviewed at least annually at Management Review.

The company acknowledges that changes will always occur and it has set out a plan for determining the need for these changes and how it will implement these.

The company has allowed for discussion on improvements to be included in its agenda for the Management Review Meetings where it will identify any changes to be made. The consequences of any changes will be considered at these meetings, along with consideration of the resources required and any reallocation of responsibilities and authorities will be discussed, allowing for any changes to be carried out in a planned and systematic manner.

7.1 Resources

7.1.1 General

The company has gained the commitment of all of its employees towards the implementation of the SHEQ.

Defining Roles and Responsibility

All employees have been made aware of their responsibility in achieving conformance with the quality and environmental policy and the requirements of the SHEQ. These responsibilities have been communicated to all employees through the use of awareness sessions.

Provision of Resources

The company has provided sufficient resources for the implementation and control of the SHEQ.

7.1.2 People

SUI GENERIS' Management has determined and provided the resources needed to establish, implement, maintain and continually improve its SHEQ.

These are defined in the process flowcharts and documented procedures.

Personnel performing work affecting conformity to product requirements are selected for competence on the basis of their education, training and skills. Training needs are based on annual assessment and with recorded evidence on the training matrix.

The organisation has the services of an Employment Law specialist through our parent company Milbank Group and a group Health and Safety Officer, ensuring updated requirements are applied accordingly.

The types of resources that had to be considered were:

Human Resources

The staffing levels, experience, qualifications and availability to work on environmental matters are deemed adequate to establishing and maintaining our SHEQ.

Specialised Skills

The company had access to specific specialised skills (e.g. trained environmental and health and safety auditors) that are required to ensure the continued operation of the management system and the quality, environmental and health and safety significant processes and activities.

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Technological Resources

The most appropriate technology available for ensuring the objectives and targets set by the organisation are met.

Financial Resources

The quality and environmental projects are given the same consideration as other business requirements

7.1.3 Infrastructure

In determining the Company SHEQ, the company has identified the infrastructure necessary and provided the resources to ensure conformity of product and service. In addition, all appropriate equipment, facilities and supporting services are made available within the organization to ensure contract obligations may be met.

The premises consist of one site with two factories and two yards. The buildings are effectively segregated for production of different types of product, including a clearly defined stores area.

The company has its own main server to which each computer links.

The software used by the organisation is monitored and installed by our Group IT Manager.

The company has hired the services of outside contractors to deliver its goods. These companies are continually monitored by way of customer feedback forms.

Information and communication technology is used in the sales processes whereby orders can be placed through the website and enquiries made by phone go through the electronic system.

7.1.4 Environment for the operation of processes

The company is committed to the provision of appropriate workshop, office and site conditions to achieve conformity of contract requirements and customer satisfaction. This is achieved by segregating noisy areas where PPE is mandatory. Where fumes are produced in the factory production area, an Air Handling system has been installed to reduce the effects of inhalation. Every reasonable effort is made to provide a suitable work environment that does not adversely impact the employees involved in the production and administration processes as well as the exterior environment which we all share.

7.1.5 Monitoring and measuring processes

The company does not generally employ processes which require the provision of calibrated equipment. Where such need arises, the equipment is generally hired in and its calibration status assured by the SHEQ Compliance Manager prior to use.

7.1.6 Organisational knowledge

The company recognises that experienced employees are essentially its main asset.

Since there is no recognised training course within this industry the Company is reliant on skills being acquired over a period of time from other experiences operatives and management. Most skills are documented in the Training Matrix and regularly assessed through inspection of work and shop floor or on-site observation.

Any skills shortfalls are subject to discussion during Management Review Meetings and addressed by in-house training or where necessary bought in services when recognisable qualifications are required.

7.2 Competence

SUI GENERIS determines competency requirements for people performing work under its control. All personnel whose work affects conformity to product requirements and our environmental performance and compliance are included in a system of identifying training needs based on annual assessment and with recorded evidence.

All personnel are given a copy of the company policy document and made aware of their role in its implementation.

Personnel performing work affecting conformity to product requirements are selected for competence on the basis of their education, training and skills.

Training is one of the key stages in the management and development of the human resources of this company. There are also close links between Health and Safety training and environmental training (e.g. COSHH). A trained operator working safely is often one who is preventing a significant environmental impact or health and safety hazard.

Training records are maintained for all employees.

Training Needs Analysis

Company management has established its commitment to environmental training and has devised a training strategy to identify the training needs of the work force.

An overview of company performance is vitally important, as any training undertaken needs to be appropriate to the organisation's aims and objectives, whilst allowing the limited resources of a company to be applied to the most environmentally significant areas.

7.3 Awareness

Awareness of Employees

The company ensures that all employees are aware of the importance of conforming to the:

- Quality, Environmental and Health and Safety Policies of the company.
- Requirements of the Quality, Environmental and Health and Safety Management System.

This is accomplished during their induction and then by ongoing training which includes amongst other things being made aware of their roles and responsibilities within SHEQ. The training matrix records all of this information.

Environmental Awareness

Environmental awareness training within the company primarily falls into two categories:

- 1 General Environmental and Health and Safety Knowledge
Imparting an understanding of global and local environmental and health and safety issues i.e. ozone depletion, energy use, water environmental, transportation, etc.
- 2 Specific Environmental and Health and Safety Knowledge
Communication of information related to the company's activities and their associated Health and Safety and environmental impacts, including the requirements of the management system.

The SHEQ Compliance Manager reviews the following areas in order to identify the company training issues:

- **Register of Environmental Aspects**
Identifies the company's significant environmental impacts and where they occur. This partly allows us to ensure that all employees are made aware of the actual or potential environmental impacts of their work activities.
- **Legal and Other Requirements (Environmental and Health and Safety)**
All of the company employees have certain legislative duties regardless of specific responsibilities (e.g. prevention of water pollution, duty of care with regards to waste, wearing of PPE, duty of care towards other employees etc.)
- **Quality & Environmental Management System**
All of the company employees are made aware of the creation of specific requirements of the SHEQ.

7.4 Communication

7.4.1 General

The key to a successful SHEQ is the establishment of good communication. This communication needs to be not only within the company but also with neighbours and other interested parties.

Communication channels allow the flow of information both ways.

7.4.2 Internal Communication

The company communicates information related to the operation of the SHEQ and the associated environmental aspects and health and safety risks of our processes to all within the company

Documented channels exist for communicating the key quality and environmental issues to all employees. Employees are made aware of their roles and responsibilities within the system and their role in fulfilling the requirements of the Quality, Environmental and Health and Safety Policies.

The responsibilities, authority and inter-relationships of all personnel are defined in their individual Job Descriptions and included in the Company Organization Chart. Communications concerning customer requirements are established primarily through the sales order/job card system.

7.4.3 External Communications

The company recognises that external communications match four distinct requirements.

- 1 Information Sent to External Parties
- 2 Requests for Information
- 3 Complaints
- 4 Regulatory Bodies

7.5 Documented information

7.5.1 General

The organisation has identified the documented information required in ISO 9001:2015, ISO 14001:2015 and ISO

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45001:2018 including documented information identified as necessary for the effective operation of the Management System.

The process of controlling the issue of documentation is important. Effective management control over records, documents and procedures can only be achieved within an established document control system.

7.5.2 Creating and updating

All records and documents within the system are periodically reviewed and updated. The SHEQ Compliance Manager sets and records the review dates for all of the relevant documents and records. Any amendments are notified to staff.

All new documents are given a **distinct title, reference number, copy number and date.**

Refer to Procedure SG-QEP-01 and Procedure SG-QEP-02

7.5.3 Control of documented information

The company has established and maintains a document control procedure. This ensures that all documents are clearly defined, regularly reviewed, updated as necessary and that the most up to date version is communicated to the appropriate departments and employees.

All relevant records and documents essential to the continued operation of the SHEQ can be located.

The SHEQ Compliance Manager records each document or record that is distributed.

8.1 Operational Planning & Control

In developing our SHEQ due consideration has been given to identify all involved processes (and their monitoring and measurement) that are necessary in ensuring the product and/or service consistently conform to customer requirements.

Risks and opportunities are reviewed and discussed during the Management Review process. Results are recorded in the current Risk Matrix and evaluated as to the effectiveness of actions taken. New targets will be set as necessary.

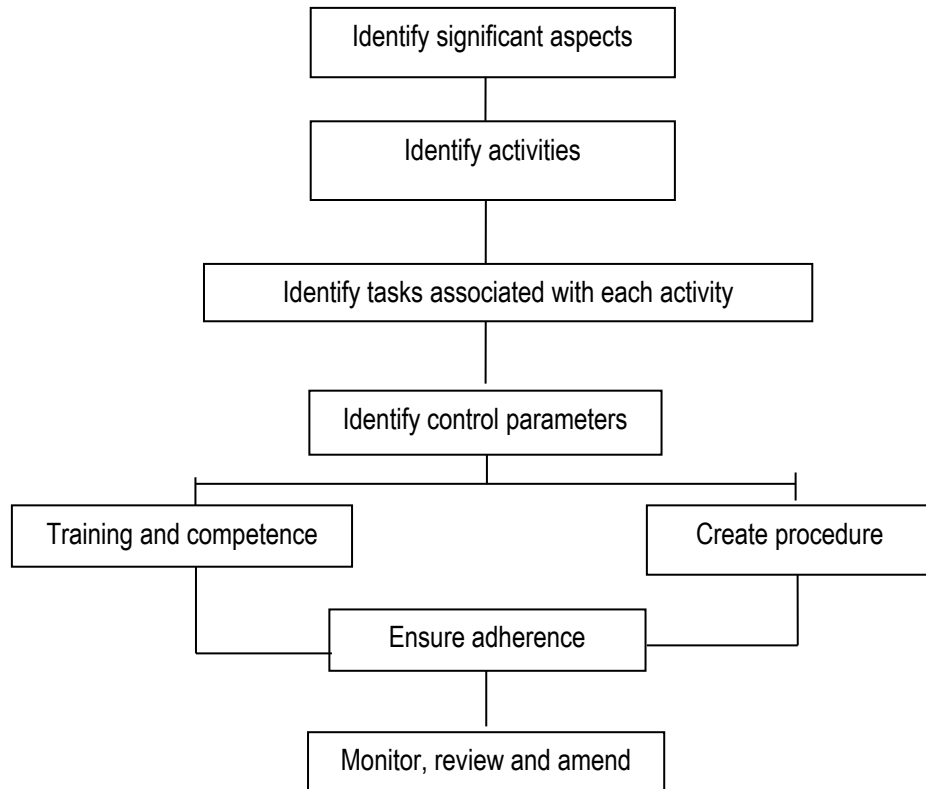
Various requirements have been established, and processes are documented in the form of flowcharts. The Production and Dispatch flowchart describes the activities involved in production of products, showing the use of job cards and inspection sheets to control the process.

The Site Operations flowchart highlights the process involved and the documents used to guarantee quality assurance. On completion of site work, the customer's signature is obtained to confirm their satisfaction, and questionnaires are used to obtain feedback.

Internal audits are used to control processes and allow us to ensure that these are being carried out as planned.

The company has identified those operations that are associated with the significant aspects in line with its policy, objectives and targets.

The process used to establish operational controls is designed to prevent deviations from the policy, objectives and targets as shown in the following flow chart:



8.1.2 Eliminating Hazards and Reducing OH&S Risks (ISO45001)

We have established a procedure for the elimination of hazards and the reduction of OH&S risks using the following hierarchy of controls, and these have been implemented and will be maintained:

- Eliminate the hazard
- Substitute with less hazardous processes, operations, materials or equipment
- Use engineering controls and reorganisation of work
- Use administrative controls, including training
- Use adequate personal protective equipment

8.1.3 Management of Change (ISO45001)

We have established a procedure for the implementation and control of planned temporary and permanent changes that impact OH&S performance, including:

- New products, services and processes, or changes to existing products, services and processes, including:
 - Workplace locations and surroundings
 - Work organisation
 - Working conditions
 - Equipment
 - Workforce
- Changes to legal requirements and other requirements
- Changes in knowledge or information about hazards and OH&S risks
- Developments in knowledge and technology.

8.1.4 Procurement (ISO45001)

We implement and maintain a procedure to control the procurement of products and services in order to ensure their conformity to our management system.

8.1.4.2 Contractors

Our procurement procedure is coordinated with our contractors in order to identify hazards and to assess and control the OH&S risks arising from:

- The contractors' activities and operations that impact our company
- The company's activities and operations that impact other interested parties in the workplace.
- The contractors' activities and operations that impact other interested parties in the workplace.

It is the responsibility of top management to ensure that the requirements of our management system are met by contractors and their workers. The company's procurement procedure defines and apply occupational health and safety criteria for the selection of our contractors.

8.1.4.3 Outsourcing

Top management ensures that:

- Outsourced functions and processes are controlled
- Outsourcing arrangements are consistent with legal requirements and other requirements and with achieving the intended outcomes of the management system
- The type and degree of control applied to these functions and procedures has been defined within the management system.

8.2 Emergency Preparedness and Response

We are very aware that we need to prepare for the unexpected, and have assessed the relevant risk of emergency situations, and out containment and response action. We consider the potential business risks, the health and safety implications for our staff, customers and other third parties, and environmental impacts. Our plans are developed with the engagement of third parties and made available to third parties where this is appropriate.

We have developed and documented a process to control our action and, in addition to our plans and processes, where practical, we test the effectiveness of these, reviewing the results and amending plans where this would strengthen our preparedness and mitigate further the impacts.

Emergency events are often areas where environmental impacts are most obvious. The spillage of chemicals into a surface water drain, the impact of a gas explosion or the impact of firefighting run-off all have obvious detrimental environmental impacts.

Identifying the Potential

The company knows that Environmental Risk Assessment is a valuable tool as it not only allows the risks to be identified but also enables prioritizing.

Reviewing the System

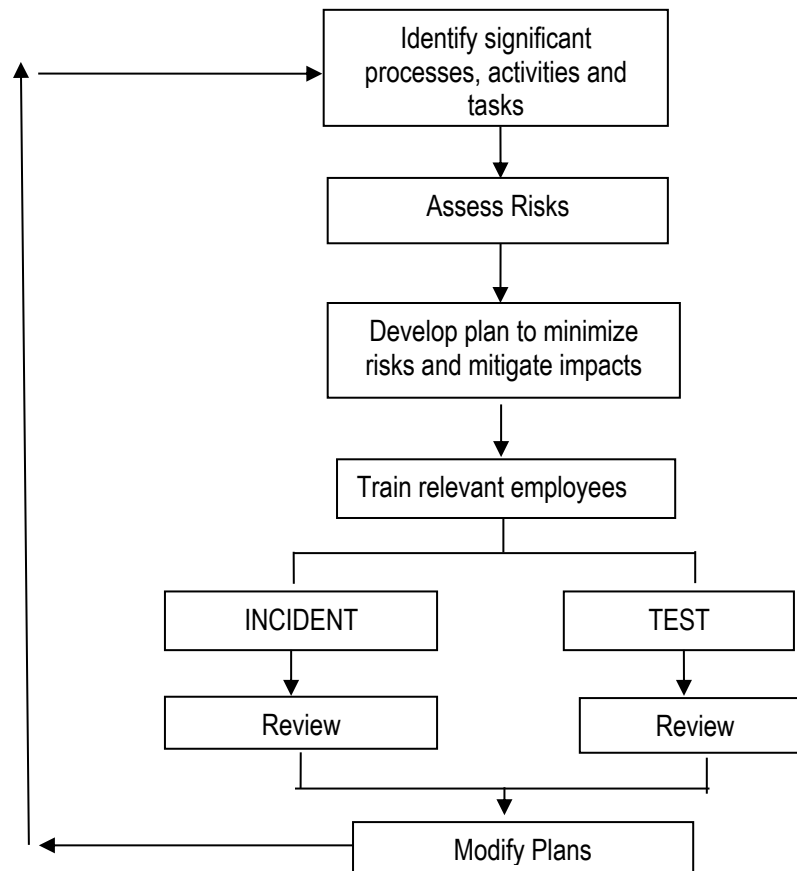
The company has identified potential emergency conditions. These are reviewed on a regular basis.

Records of any changes are kept and documented within the SHEQ.

Testing the System

All areas, processes and activities that came under the scope of the SHEQ are assessed. This results in identifying

the significant risks during abnormal and emergency conditions and enables review and modification when tested.



8.2 Requirements for Products and Services

8.2.1 Customer Communication

In developing our quality system due consideration has been given to identify all involved processes (and their monitoring and measurement) that are necessary in ensuring the product and/or service consistently conforms to customer requirements.

See Process Flow Chart – General Overview indicating communication flows.

8.2.2 Determination of requirements related to products and services

See Process Flow Charts – Estimating / Sales; Order Processing; Production and Dispatch; Site Operations

8.2.3 Review of requirements related to the products and services

See Process Flow Charts – Estimating / Sales; Order Processing; Production and Dispatch; Site Operations

8.3 Design and development of products and services

8.3.1 General

Design involvement is usually limited to the specification of laminate construction and similar technical input. This information can be recorded on design drawings provided by the customer

The company's service includes a product development capability which combines input from the customer regarding product specification and requirements and input from Sui Generis regarding technical knowledge and production expertise.

When customer specifications are provided in drawing format, the drawing issue is recorded and controlled (Procedure SG-QEP-02)

Pre-production or one-off process models are reviewed by the customer and any non-conformance or modifications agreed and recorded by the company in the contract/job file. Customer satisfaction is awarded on successful completion of the project.

8.3.2 Design & Development planning

All drawings supplied by the customer are signed and approved prior to production and kept in the job file.

8.3.3 Design & Development inputs

Design involvement is usually limited to the specification of laminate construction and similar technical input. This information can be recorded on design drawings provided by the customer.

8.4 Control of externally provided processes, products and services

8.4.1 General

See Process Flowchart – Purchasing

8.4.2 Type and extent of control

See Process Flowchart – Purchasing

8.4.3 Information for external providers

See Process Flowchart – Purchasing

8.5 Production and Service Provision

8.5.1 Control of Production and Service Provision

See Process Flowchart – Purchasing

8.5.2 Identification and Traceability

The organisation controls the unique identification of its outputs. Items are identified through order numbers, job cards and unique reference numbers.

8.5.3 Property Belonging to Customers

Property from external providers is bound by the hire agreement

8.5.4 Preservation

Reference – Process flowchart – Production and Dispatch

8.5.5 Post-delivery activities

Products are warrantied for the statutory period of time or as otherwise agreed. The Terms & Conditions detail how the client can invoke the warranty and how the Company will respond.

8.5.6 Control of changes

See Process Flowchart – Production and Despatch

8.6 Release of Products and Services

Monitoring and measurement of processes and product

The effectiveness of the processes operated by Sui Generis is monitored through internal audit of the process flowcharts and from success (or otherwise) regarding customer satisfaction.

See Flowchart – Production and Dispatch

See Procedure SG-QEP-03 – Measurement, analysis and improvement

See Procedure SG-QEP-04 – Control of non-conforming product

8.7 Control of nonconforming outputs

See Procedure SG-QEP-04

See Procedure SG-QEP-05 and relevant documentation.

9.1 Monitoring, measurement, analysis and evaluation

Product

Conformity to product requirements is demonstrated by entries at appropriate stages in production on the Job Card. (Process Flowchart – Production and Dispatch).

Conformity of the SHEQ is demonstrated through the internal audit process. (Procedure SG-QEP-03).

Continual improvement in the effectiveness of the SHEQ is monitored at Management Review.

9.1.1 Environmental and Health and Safety

An important part of establishing and maintaining the SEQ will be ensuring that our company's significant environmental and health and safety impacts are being controlled on a regular basis. The process of monitoring and measurement will provide part of the information required to ensure that this occurs.

We ensure that employees are provided with instruction or training to cover monitoring and measurement activities which could have significant environmental and health and safety impacts. Monitoring and measuring is also extended to cover suppliers and contractors.

Monitor and Measure

We have made a list of our company's significant aspects, thus identifying those situations where the collection of information could be used to monitor the associated environmental impacts. This monitoring data is used to

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establish a baseline with which we set performance targets in order to achieve continual improvement.

All Accident, Incidents and Near Misses will be monitored especially in establishing any trends that will give rise to improvement measures being put in place.

Monitoring Procedures

Monitoring and measurement procedures already exist as part of our SHEQ. What we have ensured is that the environmental standard's requirements are incorporated as far as possible into existing procedures and work instructions.

Monitoring Records

The SHEQ Compliance Manager keeps a record of all health and safety and environmentally related monitoring that is taking place on site.

9.1.2 Customer Satisfaction and Evaluation of Compliance

The Company assesses compliance through the following:

- Audits.
- Document and record review.
- Inspections.
- Interviews.
- Work reviews.
- Facility tour and/or direct observation.

Customer Satisfaction

The Company monitors their performance of customer satisfaction and/or dissatisfaction by:

- a) Telephone contact or questionnaire to customers regarding Sui Generis product and service.
- b) Site contract sign off by customers on completion of site operation contracts, the record being maintained in the job file.

Internal Audit

Refer to procedure SG-QEP-03

9.1.3 Analysis and Evaluation

The Company determines, collects and analyses appropriate data to demonstrate the suitability and effectiveness of the SHEQ and evaluates where continual improvement of the effectiveness of the management system can be made. This may include data generated as a result of monitoring and measurement and from other relevant sources.

The analysis of data provides information relating to

- a) customer satisfaction,
- b) conformity to product requirements

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- c) characteristics and trends of processes and products including opportunities for preventive action, and
- d) suppliers

9.2 Internal Audit

The primary objective of a SHEQ audit must be to assess whether the actual performance of our company's management system conforms to the planned arrangements.

These performance assessments check whether or not the system is effectively implemented and maintained, whilst being suitable to fulfill the company's environmental and quality policy and objectives.

The company is able to demonstrate that it has provided information on the audit results to all relevant management levels within the company including Top Management.

At these reviews management address the need for changes in policy, objectives and other elements of the SHEQ in light of the audit results.

Programmes and Procedures

The company has established and maintains a programme and procedure for periodic SHEQ audits.

Refer to procedure SG-QEP-03

9.3 Management Review

Top Management has a SHEQ review at regular intervals, at least annually.

The overall aim of the review meeting is to determine the suitability of the present system and to assess whether changes are required to facilitate continual improvement.

Minutes of the meeting are taken and retained.

The Minutes from the reviews should be treated as a record within the SHEQ. This record will be examined during an audit.

Review Input:

- The status of actions from previous management reviews
- Changes in external and internal issues that are relevant to the SHEQ system
- Risks and Opportunities
- Incidents, nonconformities, corrective actions and continual improvement
- Extent to which objectives and targets have been met in all business areas.
- Results of audits and assessments completed since the previous review.
- Progress of improvement programmes and the associated cost benefits.
- Process performance and product conformity
- Present status with regards to environmental and health and safety legislative compliance.

- Customer and public complaints.
- Customer feedback
- Environmental and health and safety performance of contractors and suppliers *etc.*
- Outstanding training needs.
- Use of emergency plans and any subsequent actions taken, and their effectiveness.
- Status of preventive and corrective actions
- Consultation and participation of workers
- Risks and Opportunities
- Adequacy of Resources
- Potential future environmental issues (i.e. new plant and equipment, changes in legislation *etc.*)

The results of the review meeting are documented and treated as a record within the SHEQ.

Review Output

Any changes that are required as a result of the management review are incorporated into the management system. The Quality Compliance Manager tracks the actions and ensures they are completed within the specific time scales.

The output from the management review shall include any decisions and actions related to

- a) The continuing suitability, adequacy and effectiveness of the SHEQ management system in achieving its intended outcomes
- b) improvement of product related to customer requirements
- c) Continual improvement opportunities
- d) Any need for changes to the SHEQ management system
- e) improvement of the effectiveness of the SHEQ and its processes, particularly regarding corrective and preventive actions
- f) any implications for the strategic direction of the organisation
- g) resources needed.

10.1 General

The Company maintains systems for the review, investigation and correction of nonconformities in product, processes, facilities and systems. These systems which rely, in the main, on the review of quality and environmental records, include procedures to ensure that any proposed corrective and/or preventive actions are implemented in the required time scale and proved to be effective.

Opportunities for improvement will be looked for from the available records and regular audits and inspections.

Continual improvements are reviewed at least annually at Management Review.

Corrective Action - Ref Procedure SG-QEP-05

Preventive Action - Ref Procedure SG-QEP-05

10.2 Nonconformity and Corrective Action

Non-conformance issues are often indicative of a SHEQ which is not functioning as well as it could. The process of correcting and preventing non-conformances is an important one. Only by identifying, assessing, correcting and then reviewing non-conformance can continual improvement be achieved.

Correcting the System

The company operates procedures that are used to handle and investigate non-conformance issues that fall within the scope of the SHEQ. The areas that non-conformances are raised could include:

- Quality, Environmental and Health and Safety audits.
- Incident/hazard reports.
- Environmental risk assessments
- Health and Safety Risk Assessments
- Management meetings
- Legislative compliance assessments.
- Internal/external complaints.
- Measuring and monitoring activities.
- Management reviews.

Refer to Procedure SG-QEP-04 and SG-QEP-05

Appropriate Actions

In order for us to assess what appropriate action needs to be taken we review

- Root causes of non-conformance
- Trends and patterns
- Any associated impacts

10.3 Continual Improvement

SUI GENERIS maintains systems for the review, investigation and correction of nonconformities in product, processes, facilities and systems. Continual improvements to the management system are reviewed at least annually at Management Review. Only by identifying, assessing, correcting and then reviewing non-conformance can continual improvement be achieved.

The process is as follows:

1. Identify non-conformance issue
2. Collect information about non-conformance issue (cause)
3. Develop solutions (corrective/preventive action)
4. SHEQ Compliance Manager should ensure implementation and effectiveness
5. Systematically review demonstrated effectiveness
6. Document changes