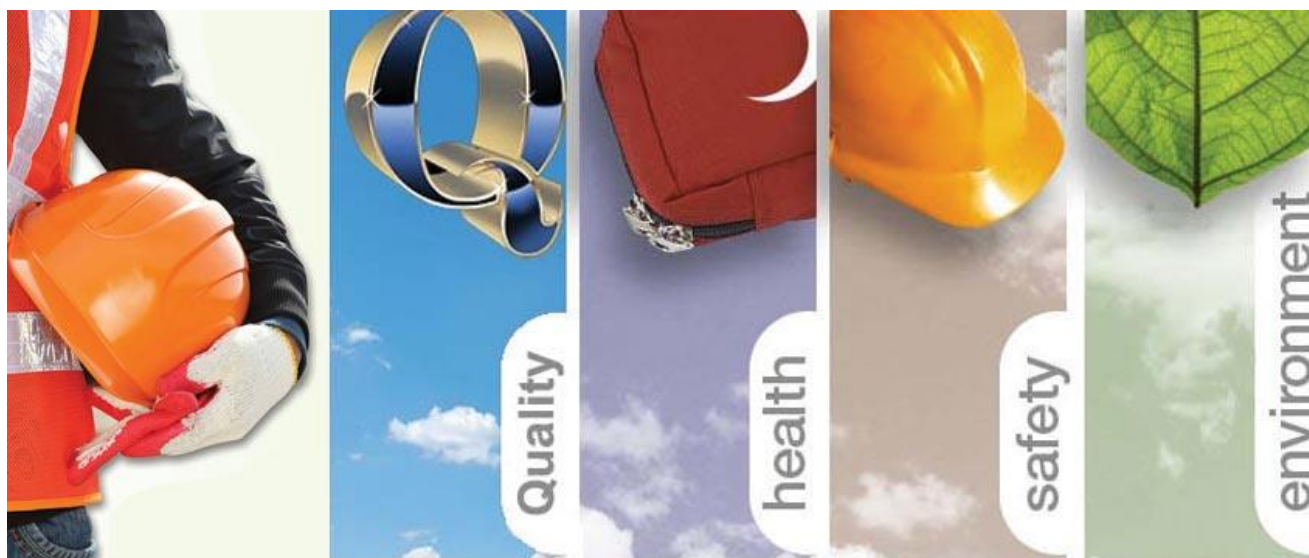




Integrated Management System Manual



Document

Occupational Health, Safety, Environmental & Quality
Integrated Management Manual

Version 7.0

Uncontrolled when
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Controlled




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Dated

February
2023

Approvals

The signatures below certify that this quality manual has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
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Approved by	Kevin Stubbs		Director	17.02.2023
	Lee Sunter		Director	17.02.2023

Amendment Record

This IMS manual is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date
All	New Integrated Management Manual (Combine ISO:9001/14001 & 45001)	3.0	11.01.2019
All	Annual Check & Review (ISO:9001/14001 & 45001)	4.0	07.01.2020
All	Annual Check & Review (ISO:9001/14001 & 45001)	5.0	25.01.2021
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Introduction

Sunter Limited is a construction company based in Hetton-le-Hole that specialises in the regeneration of Social Housing for Local Authorities and Housing Associations across the NE of England.

Established in 1973 as Sunter Brothers and becoming a Limited Company in 1998. The company changed its name to **Sunter Limited** and carried on growing and gaining contracts, clients and a positive reputation.

Acting as a Principal Contractor for over 45 years, we offer a complete package to current and potential clients.

Sunter Limited directly employ all types of professional, managerial, administration and site staff as well as having a large array of resources available for deployment to site.

Sunter Limited has developed and implemented a management system in order to document the company's best business practices, and to better satisfy the requirements and expectations of its interested parties and to improve the overall management of the company.

This manual describes the management system, delineates authorities, inter relationships and responsibilities of personnel responsible for performing within the system. The manual also provides procedures or references for all activities.

This manual is also used externally to introduce our management system to our customers, other external organisations and interested parties. The manual is used to familiarise them with the controls that have been implemented and to assure them that the integrity of our management system is maintained and focused on customer satisfaction, continual improvement and safe & sustainable operations.

The IMS Manual

Sunter Limited has developed this Integrated Management System Manual to combine the 3 separate ISO9001, ISO14001 & ISO45001 management systems into one combined document that encompasses all elements of the Quality, Environmental & Occupational Health & Safety Standards.

Where there is a requirement to reference a specific standard the following colours will be used:

Black: ISO 9001:2015

Green: ISO 14001:2015

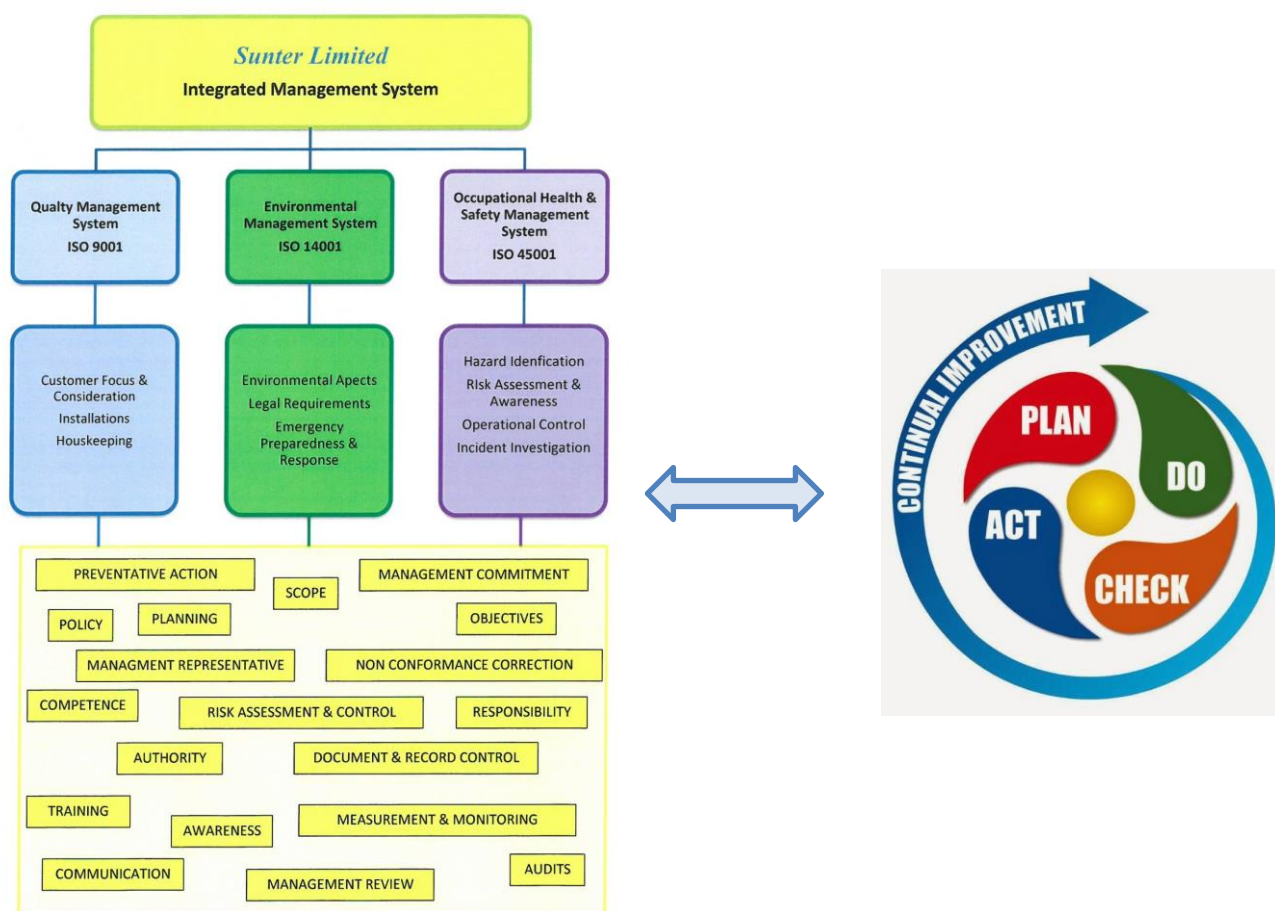
Purple: ISO 45001:2018

What is the Integrated Management System (IMS)

ISO9001, ISO14001 and ISO45001 have a process and risk-based approach and follow the **Plan-Do-Check-Act** philosophy to ensure continual improvement is achieved at all times. These improvements are required to be achievable and monitored by competent internal and external review.

Each has its own individual elements as well as having common procedures.

Having an IMS makes good business sense, a single system will be easier to plan, manage and implement across all of the businesses undertakings.



4. Integrated Management System (IMS)

4.1 Introduction

Sunter Limited has implemented a IMS management system that exists as part of a larger, overall management system which has established, documented and implemented our quality, environmental & safety policy and related processes for providing services which meet or exceed customer requirements. The system also recognises the needs and requirements of other interested parties.

Documents referenced within this manual are available upon request, if not readily available in the public domain.

Sunter Limited has adopted the process approach, by defining and managing process inputs, controls and outputs to ensure the desired results are achieved and by managing the interfaces between interrelated processes to ensure system effectiveness is maintained.

Sunter Limited monitors, measures and analyses relevant processes and takes action to achieve planned results and ensures the continual improvement of our management system.

Specific responsibilities for, and the sequence and interaction of key management system processes are detailed in the quality procedures, some of which contain or reference deployment flow charts depicting the process or which is also described in the narrative of the procedure.

When **Sunter Limited** chooses to outsource any service and/or delivery of product/equipment, the span of control is described in the purchasing procedure. The span of control consists out of a number of steps, which are all defined in these purchasing procedures.

Sunter Limited have determined the external and internal issues that are relevant to its business. Each of the identified issues is considered to have a direct impact on the business and shall be managed accordingly.

The list is not exhaustive and is very fluid, but the key external and internal issues are identified;

External or Internal Issues	Impact on Business
Customer success	Continuation of business
Competitors	Customer retention, market share, ability to continue operations
Local / national authority requirements	Site operations
Resource availability (Staff)	Delay / change in operations
Maintenance provision	Daily operations
Suppliers & Manufacturers	Fuel, parts, waste collection
Media	Perception, reputation
Weather	Daily operations

The identified issues are determined and monitored on regular basis during meetings, e-mails, memo's, bulletins and any other means that is applicable to the particular issue.

4.2 Documentation Requirements

Sunter Limited have identified the following “interested parties” as having an effect or potential effect on the business due to their requirements;

Interested parties	Impact to business
Customers	Daily and long-term operations
Clients	Daily and long-term operations
Local / national authorities	Daily operations
Employees	Daily and long-term operations
Suppliers & Manufacturers	Daily and long-term operations
Community	Daily and long-term operations
Neighboring companies	Daily and long-term operations
Owner	Daily and long-term operations

The identified interested parties are determined and monitored on regular basis during meetings, e-mails, memo's, bulletins and any other means that is applicable to the particular issue.

4.3 Determining the scope of the Integrated Management System

Sunter Limited have assessed, determined and implemented the impacts & expectations of its internal & external influences and Interested parties to determine the Integrated Management Systems (IMS) scope and to ensure that all interested parties have a clear and unequivocal understanding of the systems, processes and accompanying policies and procedures that make up **Sunter Limited's** IMS.

Any questions and/or queries regarding this document and or any other document should be addressed as soon as possible to the document Author as determined on page 2.

The following Statements & Directions aim to give an insight into the scope of the company and its continuous goal to continuously improve.

SUNTER LTD MISSION STATEMENT

‘At Sunter Limited we constantly strive to achieve a culture of excellence, maintaining a high standard of workmanship: leading the way forward with a level of service and commitment that will continue to develop relationships with both new and existing clients’.

SUNTER LTD BUSINESS DIRECTION

Sunter Limited's aim is to monitor and improve its performance, and is committed to achieving this by:

- Continuing to meet customer expectations and wherever possible exceed them.
- Training and developing of local people, improving on our already outstanding staff retention by valuing their commitment and emphasising there importance.
- Providing and maintaining safe systems of work, safe healthy conditions and safe equipment, therefore creating a positive health and safety culture for all employees and anyone affected by the Companies undertakings.
- Ensuring that the Company complies with all environmental aspects, therefore helping to maintain the environment for future generations.

Our Strategy:

- Develop, maintain our client base, this can be achieved by establishing new long-term links and partnerships.

SUNTER LTD QUALITY MISSION STATEMENT & DIRECTION

Sunter Limited subscribes to the Quality Policy in place and is committed to implementing and maintaining an quality management system conforming to BS EN ISO 9001 throughout the whole of the company's undertaking and at all of its premises and work sites.

We aim to excel in all areas of our undertakings from the smallest of jobs, through to the largest of Contracts. We have a uniform approach to all work carried out in 'the Sunter name'.

Our Promises include:

- To deliver high quality services and standards of excellence, including enabling services, processes, people and performance.
- To continuously monitor and review, promote and deliver best practice including innovation and longer term efficiency across all company undertakings.
- To deliver contracts in accordance with Clients expectations, ensuring that all requirements are fulfilled.
- To focus on Customers & Client needs, ensuring that all information is given prior to the commencement of works, and establishing positive communication at all times.
- To commit time, resources and financial means to establish a competent, trained and skilful workforce, including the training and development of employees to their maximum potential.
- Ensure employees at all levels are aware of their responsibilities whilst carrying out work on behalf of Sunter Ltd.
- We will ensure that the communication of this policy is achieved to employees, contractors, clients, customers and any other who may wish to view it. Sunter Ltd Directors and Senior Managers ensure that all requirements; both economically and morally are in place and implemented at all times, ensuring that Quality and Quality Management is second nature.....At All Times.

SUNTER LTD ENVIRONMENTAL MISSION STATEMENT & DIRECTION

Sunter Limited subscribes to its Environmental Policy and is committed to implementing and maintaining an environmental management system conforming to BS EN ISO 14001 throughout the whole of the company's undertaking and at all of its premises and work sites.

Our aim is to monitor and improve on our environmental performance, and the company is committed to achieving this by:

- Complying with all relevant environmental regulations, legislative requirements, codes of practice, corporate policies and protocols, as a minimum.
- Co-operating with Client, Local Authority and Housing Associations with regards to all aspects that could or have an adverse effect on the environment.
- Prevent pollution
- Develop and maintain continuous improvement of our environmental performance, specifically addressing:
 - Waste (reduction and re-cycling of)
 - Noise
 - Energy Use (and miss-use)
 - Vehicle Use
 - Delivery Schedules
 - Material Order Management
 - Any other
- Promoting employee involvement and awareness of environmental issues through training and educational programmes.
- Fully integrate environmental considerations into all aspects of the company's undertakings to minimise any adverse environmental effects, locally and globally, as far as is reasonably practicable.

SUNTER LTD GENERAL OCCUPATIONAL HEALTH & SAFETY STATEMENT & DIRECTION

Sunter Limited subscribes to the Health & Safety Policy in place and is committed to implementing and maintaining a Health & Safety System conforming to ISO45001 throughout the whole of the company's undertaking and at all of its premises and work sites.

Our aim is to monitor and continuously improve on our health & safety performance, and the company is committed to achieving this by:

- Complying with all relevant health & safety regulations, ACOPS and other legislative documents and/or requirements, codes of practice, corporate policies and protocols, as a minimum.
- Co-operating with Client, Local Authority and Housing Associations with regards to all aspects that could or have an adverse effect on the health & safety and the protection of individuals, groups and property.
- Develop and implement Safe Working Practices in all undertakings, by the provision of Information, Instruction & Supervision to ALL Employees as well as Contractors tasked to carry out undertakings on the company's behalf, this is achieved by the provision of:
 - Generic Risk Assessments
 - Site Specific Risk Assessments
 - Work Method Statements
 - COSHH Assessments
 - Any Other
- Training: Provide suitable and sufficient training to enable employees and contractors to carry out their work activities without hazard and/or risk, including:
 - Initial Company Induction
 - Site Induction
 - Tool Box Talks
 - Safety Presentations
 - Trade Specific Industry Standard training
 - CSCS Cards and Health & Safety Testing
 - Any Other
- Develop and maintain continuous improvement of our health & safety performance, addressing all aspects of works, which include:
 - Site Supervision & Management
 - Plumbing & Heating Operations
 - Joinery Operations
 - Plastering & Wall Tiling Operations
 - General Operative Operations
 - Stores Operations
 - Trainees & Apprentice Supervision & Management
 - Any other
- Fully integrate health & safety considerations into all aspects of the company's undertakings to minimise any adverse effects, as far as is reasonably practicable.

Internal audit and review of the health & safety management system shall ensure that the system remains effective and meets ISO45001 standards throughout the Company.

This Health & Safety System Manual will be made known to all our employees and to members of the public and interested parties upon request.

4.4 Integrated Management System and its processes

All processes needed to establish, implement, maintain and continually improve the Integrated HSEQ Management System are specified in the different clauses in this manual.

The processes are in place to ensure that all employees and others are aware of the procedures in place. The main activities that require a formal process is the procurement of works via tenders and submissions followed by the surveying process and installation processes that follow.

Tendering & Quality Submission

The majority of work tendered for is now electronically submitted via Suppliers Portals.

These require the submission of:

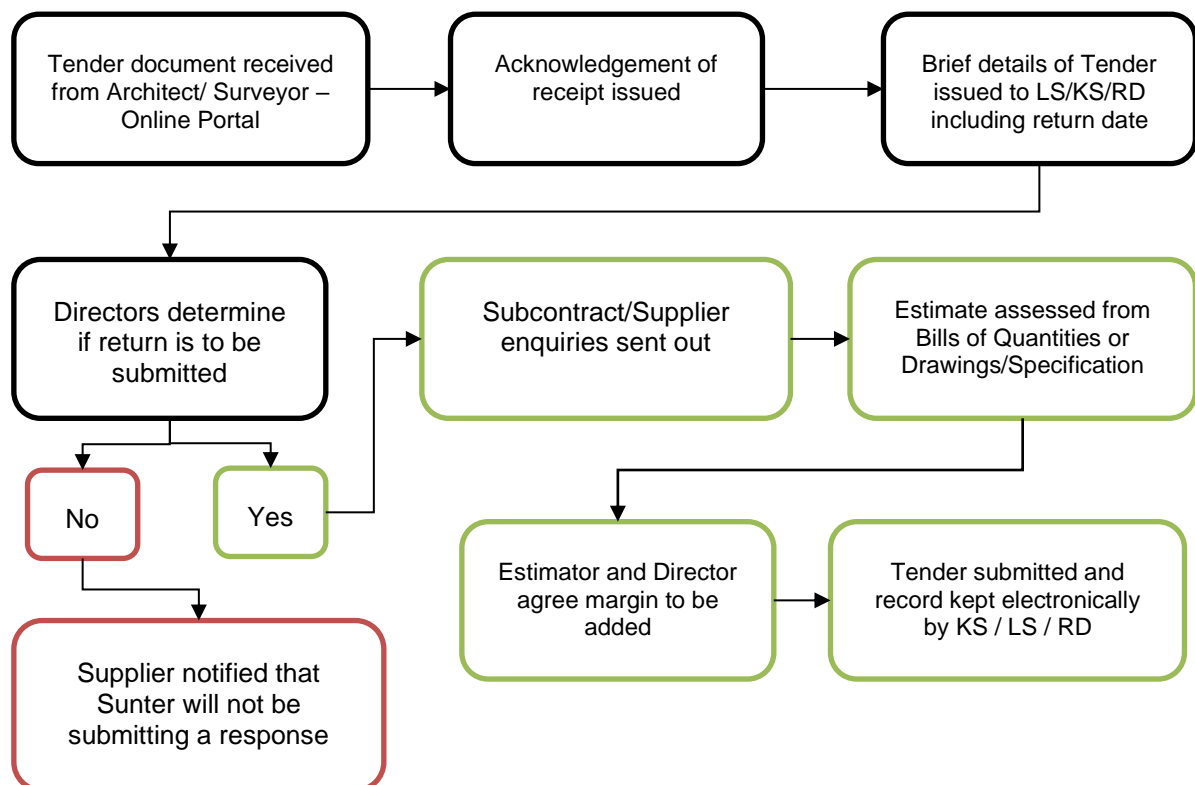
- Priced Tenders
- Quality Submissions (PQQ's)

Upon the successful allocation of works, the following procedures are required:

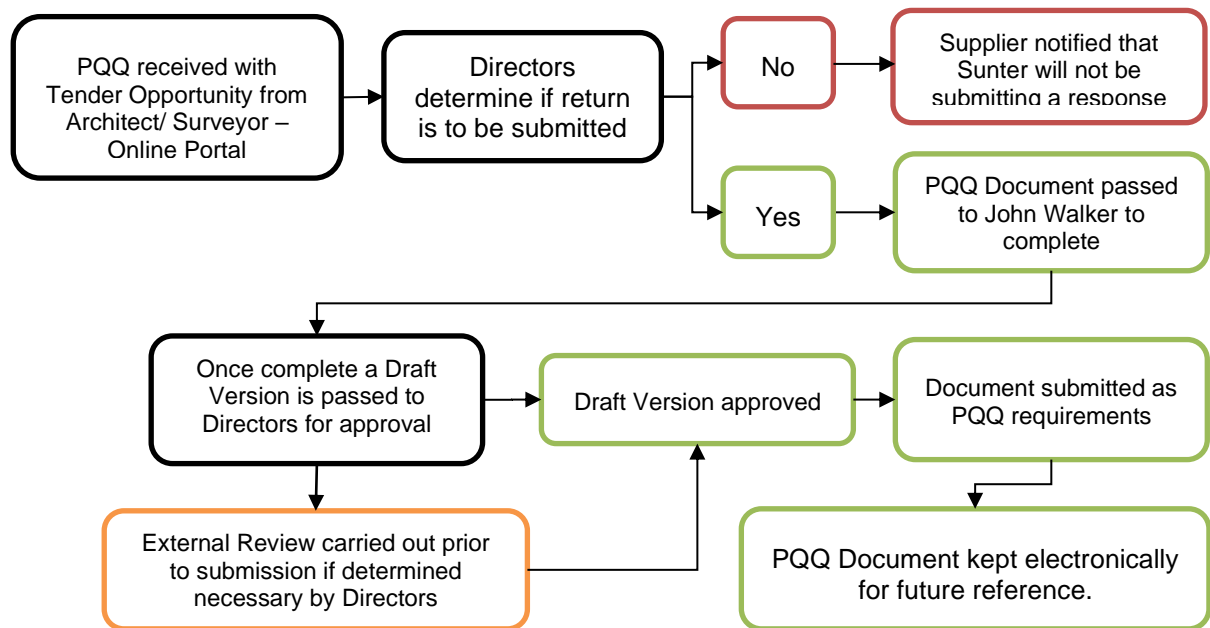
- Surveying
- Ordering
- Installation

The process for the submission of tenders/quality submissions are as follows.

Priced Tender Process Flow



Quality Submission (PQQ) Process Flow

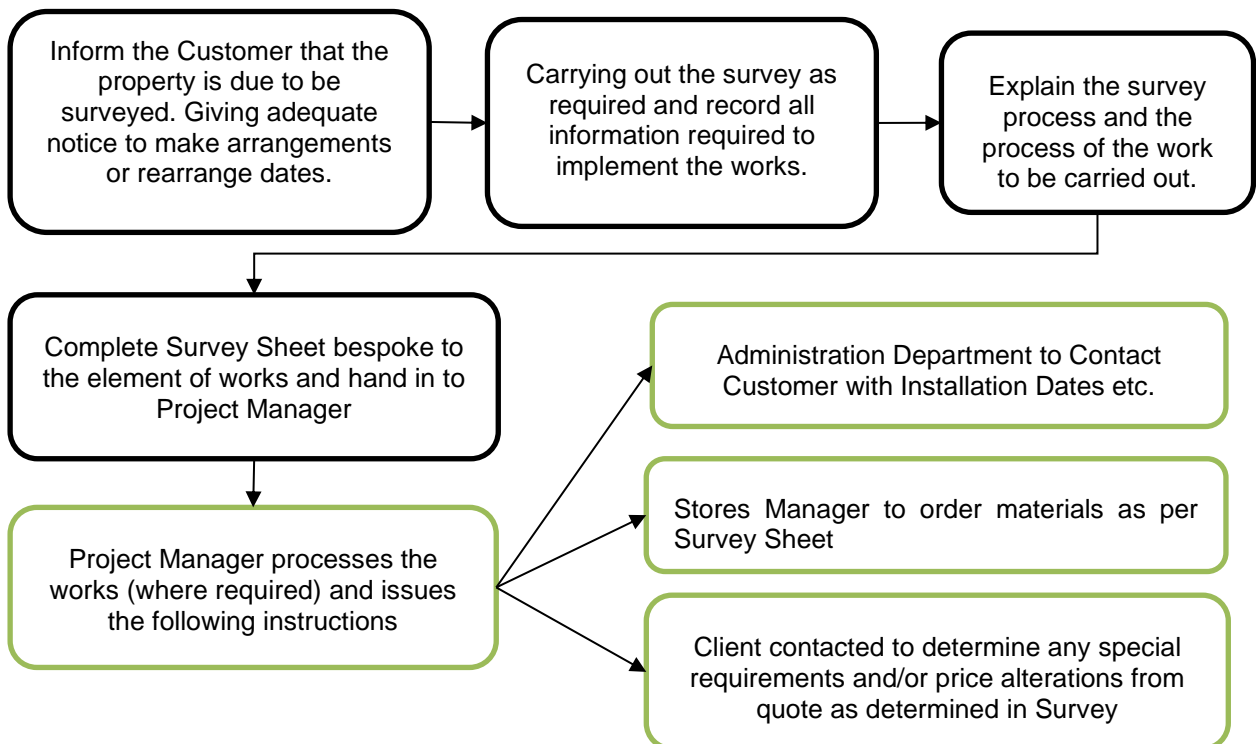


After the successful tendering and allocation of works, the surveying, ordering and installation process are required.

The following Process Flow Charts shows the methods used to ensure these are realised.

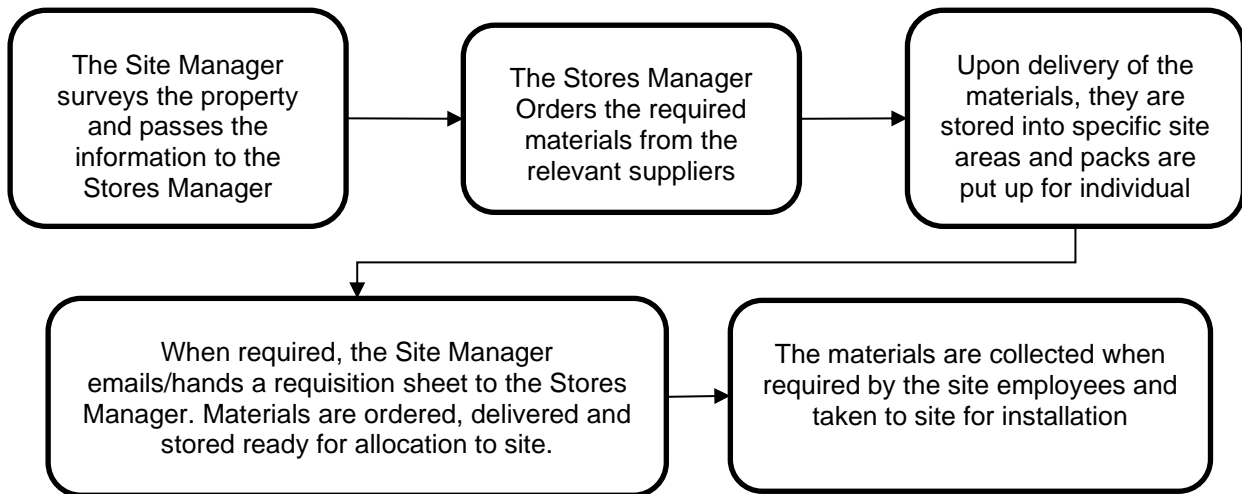
Surveying Process Flow

All properties require a survey to determine the scope of works and any individual requirements. The process for the surveying of properties is bespoke to the individual property and scope of works. The following procedure identifies the overview of the process.



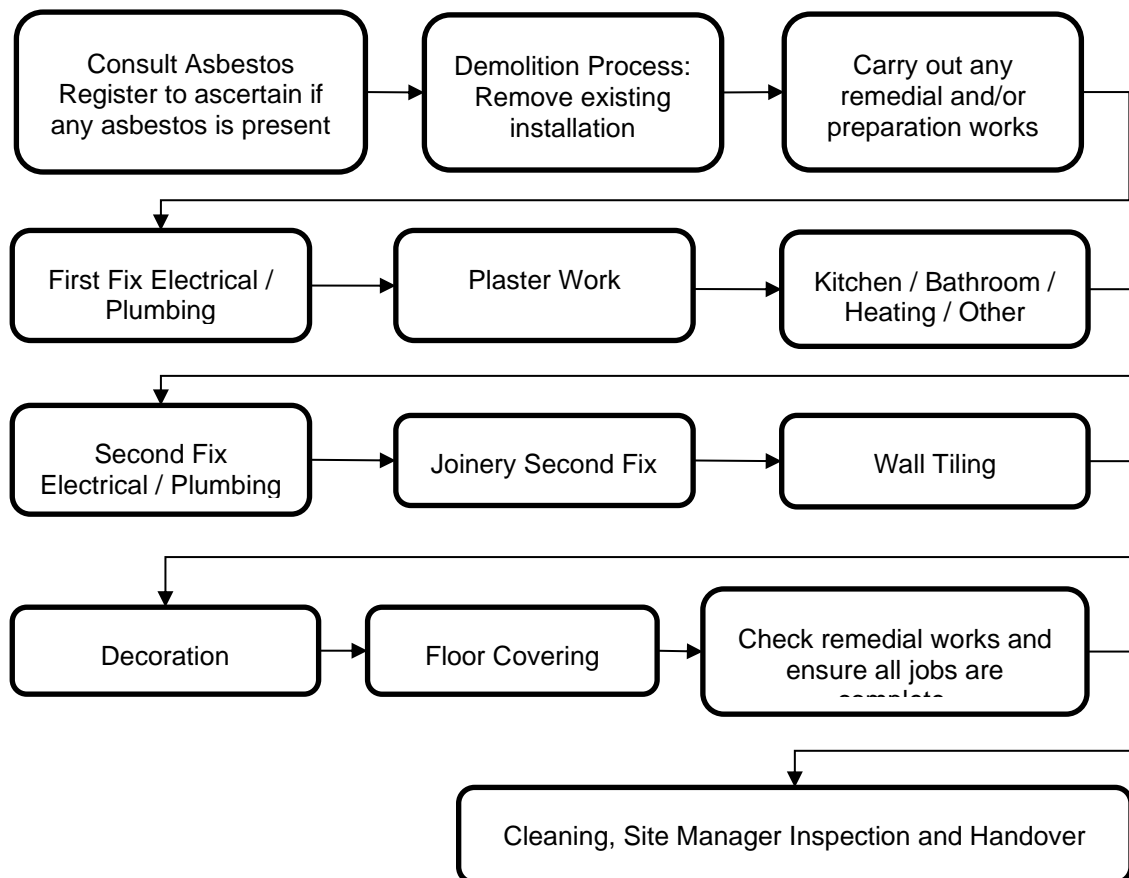
Site Ordering Process Flow

Materials identified at the survey stage are ordered as per the process flow below.



Installation Process Flow

The following process flow gives a method of installation on most domestic installations of kitchens, bathrooms and heating systems.



Environmental Processes

The aim of this procedure is to identify the environmental aspects, legal and other requirements of its activities, products and services within the defined scope of the environmental management system, taking into account planned and new developments, or new or modified activities, products and services. Also to determine those aspects that has significant impact(s) on the environment

The scope of the procedure is to identify and plan the activities that the company have, and produce a detailed action plan that can be implemented and maintained to ensure that the company attains and maintains the BS EN ISO 14001 Accreditation. An Action Plan will be produced to determine the way forward in the implementation of the Standard. Objectives, targets and programme(s) will be implemented where required

Planning of the Environmental Management System will be overseen by the Managing Director in conjunction with the Company Directors. The daily running and managing of the system will be overseen by the Health, Safety & Environmental Manager (HSEM).

The company has various areas that will need to be managed in accordance with the Standard. The main areas are:

- Waste
- Stock
- Suppliers/Manufacturers
- Vehicles
- Energy use and Miss-Use
- Delivery Schedules
- Consumables

Legal and other requirements that need to be in place to adhere to the standard are listed below and will be updated if and when required. The implementation of the statute will be the responsibility of all who work for the company.

Statutory legal compliance with the Standard includes complying with the following Regulations, Approved Codes of Practice, Policies and/or Legislative Requirements

- ISO 14001:2015 Standard
- The Environmental Protection Act 1990
- The Waste Management (England & Wales) Regulations 2006
- The Control of Pollution Act 1974
- The Noise Act 1996 (as amended by the Anti-social Behaviour Act 2003)
- The Building Regulations 2000 (SI 2000/2531) made under the Building Act 1984
- The Control of Noise at Work Regulations 2005
- The Environmental Noise (England) Regulations 2006
- Any other relevant Act, Regulation ACOP and or other Statutory Notice.

Information on applicable legal requirements can be gathered from the following sources:

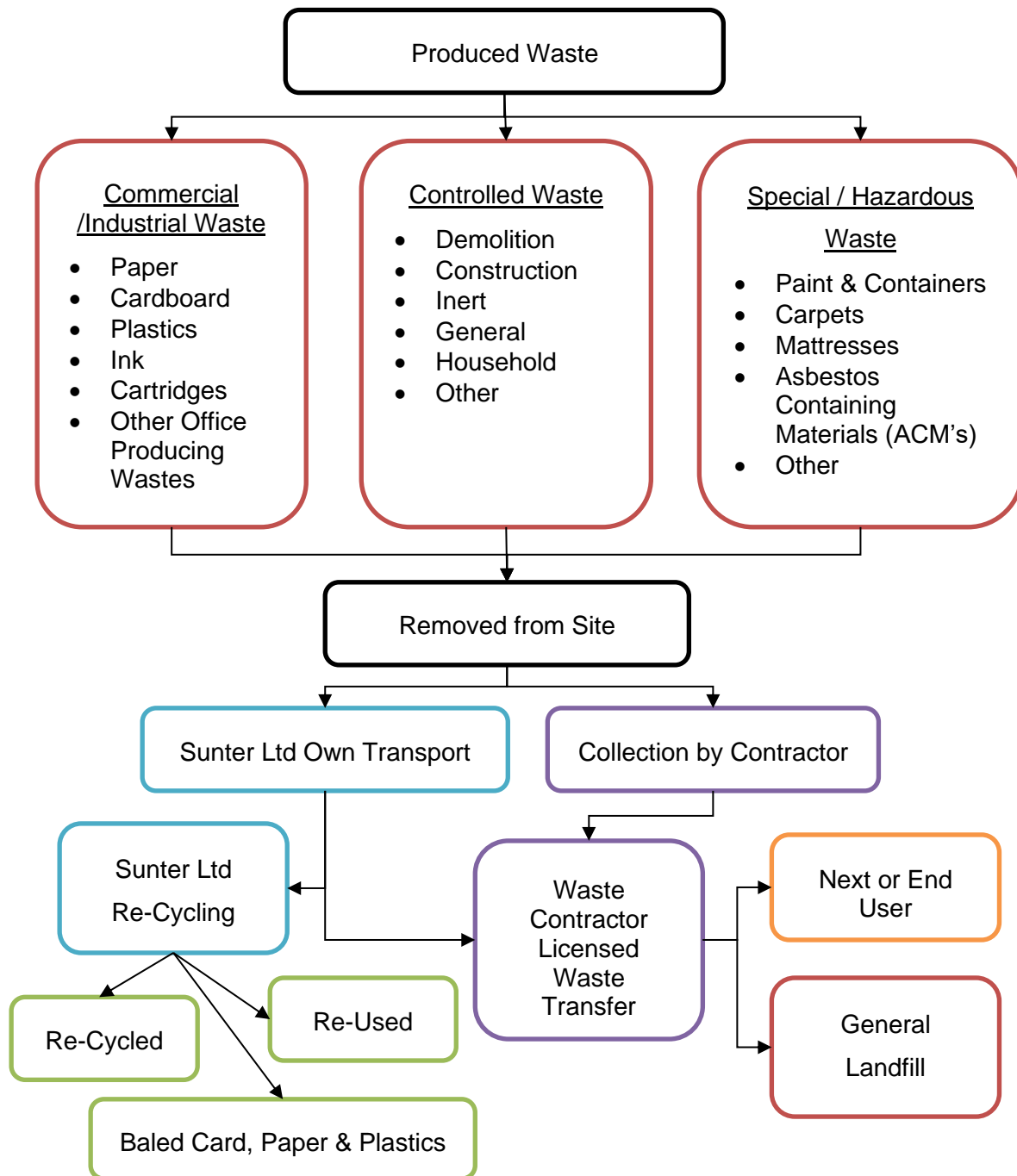
- In-house
 - Via the Safety Manager or Senior Management
 - By reference to Company Policies and/or Procedures
- Accredited Trade Bodies including
 - Construction Confederation
 - FENSA
 - Gas Safe Register
 - Others

- Clients, including:
 - Local Authorities
 - Housing Associations
 - Others

All environmental requirements regarding the Company's undertakings will be included in any statutory documentation for individual sites etc. A general oversight of the requirements will be included in this manual.

Revisions and updates to the manual will be passed onto all relevant parties if and when required to ensure that the company's environmental position is up to date.

Sunter Limited Waste Stream Removal Process Flow



Occupational Health & Safety Processes

The aim of this procedure is to identify the health & safety aspects, legal and other requirements of its activities, products and services within the defined scope of the health & safety system, taking into account planned and new developments, or new or modified activities, products and services. Also to determine those aspects that has significant impact(s) on the health & safety of any person(s) or organisations that come into contact with the company.

The scope of the procedure is to identify and plan the activities that the company have, and produce a detailed action plan that can be implemented and maintained to ensure that the company attains and maintains the ISO45001 Accreditation. An Action Plan will be produced to determine the way forward in the implementation of the Standard. Objectives, targets and programme(s) will be implemented where required

Planning of the Health & Safety Management System will be overseen by the Managing Director in conjunction with the Company Directors. The daily running and managing of the system will be overseen by the Health & Safety Manager.

The company has various areas that will need to be managed in accordance with the Standard. The main areas are:

- Risk Assessment & Control (Risk Assessments and Work Method Statements)
- Information, Instruction, Training & Supervision
- Auditing and Inspection (Internal & External)
- Implementation & Operation

RISK ASSESSMENT & CONTROL

The company takes assessment of risk and hazards that may be evident during its undertakings as a priority.

To accommodate and facilitate risks and hazards that may be evident either on site or at the head office facility, risk assessments and work method statements are carried out on work activities. These risk assessments and work method statements form a part of the system that as a whole encompasses all health & safety control measures.

These risk assessments, work method statements and other documents are formulated in a methodical way by the Health & Safety Manager to ensure that a safe working environment is in place at all times.

The assessment and control of risk is a major factor in ensuring that a safe working environment is achieved.

Legal and other requirements that need to be in place to adhere to the Standard are listed below and will be updated if and when required. The implementation of the statute will be the responsibility of all who work for the company.

Statutory legal compliance with the Standard includes complying with the following Regulations, Approved Codes of Practice, Policies and/or Legislative Requirements

- ISO45001 Standard
- The Health & Safety At Work 1974
- The Management of Health & Safety at Work Regulations 1999
- The Construction, Design & Management Regulations 2015
- Manual Handling Operations 1992
- Provision and Use of Work Equipment 1998
- Control of Substances Hazardous to Health Regulations 2001
- Reporting of Injuries, Diseases and Dangerous Occurrences 1995

-
- Lifting Operations and Lifting Equipment Regulations 1998
 - The Construction, Design and Management Regulations 2015
 - Electricity at Work Regulations 1989
 - The Control of Noise at Work Regulations 2005
 - Any other relevant Act, Regulation ACOP and or other Statutory Notice.

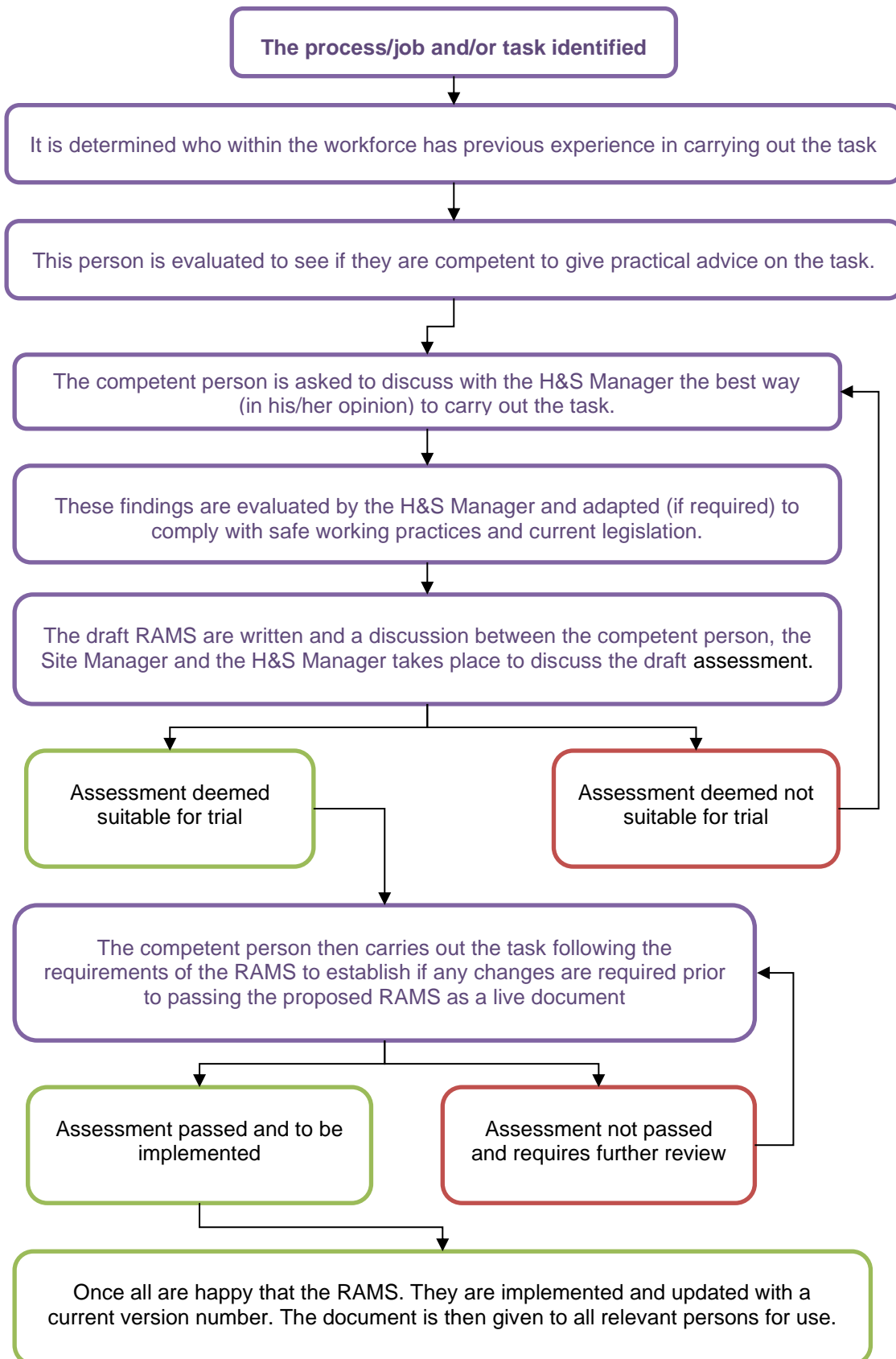
The list above is not exhaustive, all current legal requirements and regulations will be strictly adhered too by the company.

Information on applicable legal requirements can be gathered from the following sources:

- In-house
 - Via the Safety Manager or Senior Management
 - By reference to Company Policies and/or Procedures
- Accredited Trade Bodies including
 - The Health & Safety Executive
 - National Federation of Builders (NFB)
 - Construction Confederation
 - FENSA
 - Gas Safe Register
 - Others
- Clients, including:
 - Local Authorities
 - Housing Associations
 - Others

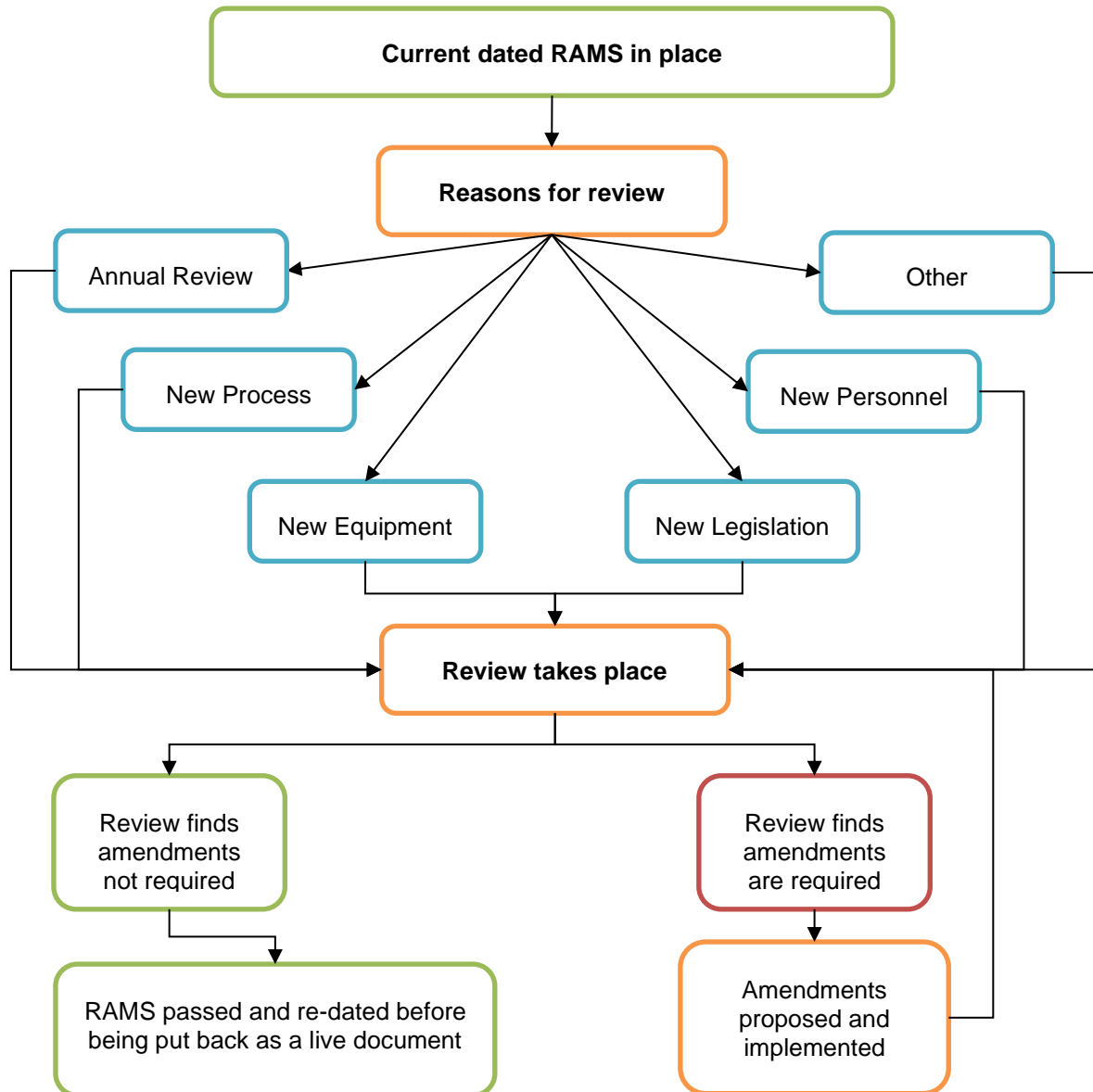
All health & safety requirements regarding the Company's undertakings will be included in any statutory documentation for individual sites etc via the Construction Phase Health & Safety Plan.

Risk Assessment & Method Statement (RAMS) Formulation & Amendment Procedures



Risk Assessment Review Procedure

Once the procedure shown has been carried out and the risk assessment becomes a live document, the following annual review procedure is carried out to ensure that the risk assessment is current and up to date



5. Leadership

Top Management has the responsibility and authority for supporting the development and implementation of the quality management system, for ensuring that it remains relevant to the company's objectives, and the needs and expectations of its interested parties whilst promoting an ethos of continual improvement.

Top Management and their direct reports are responsible for communicating the Health, Safety, Environmental & Quality (HSEQ) policy's as well as the importance of meeting customer, statutory and regulatory requirements to employees within their respective Departments. They ensure the policies are understood and that they are applied to the daily work of the organization through the establishment of measurable goals and objectives.

Top Management is responsible for ensuring that the HSEQ policies are appropriate for the goals of the business, that it promotes the continuing improvement of the effectiveness of the HSEQ management system and that it is reviewed for continuing suitability.

All managers are responsible for communicating business plans and organizational goals within their respective Departments and reporting back to the organization on the performance and effectiveness of the HSEQ management system.

5.1 Leadership and Commitment

5.1.1 General

The Managing Director and Staff of **Sunter Limited** are committed to implementing and developing the HSEQ management system and this commitment is defined by the HSEQ policies.

We ensure that our HSEQ policies are understood, implemented and maintained at all levels of the organization through printed distribution of our HSEQ policies statements and through periodic management review of the HSEQ policies statements and corporate level improvement objectives. In addition, our HSEQ policies and objectives are communicated and deployed throughout the business via individual performance objectives established and reviewed during employee performance reviews.

All Managers and Site Managers demonstrate their commitment to the development and improvement of the IMS management system through the provision of necessary resources, through their involvement in the internal audit process and through their proactive involvement in continual improvement activities. Emphasis is placed on improving both the effectiveness and efficiency of key HSEQ management system processes.

Periodic Management Meetings are used as a vehicle to discuss the IMS and any issues and/or improvements proposed.

Any comments regarding this guide are welcome, and can be addressed via the Director of **Sunter Limited**

Transparency and predictability are of tremendous importance for **Sunter Limited** customers.

5.1.2 Customer focus

Sunter Limited strives to identify current and future customer needs, to meet their requirements and to exceed their expectations. Top Management ensures that the focus on improving customer satisfaction is maintained by setting and reviewing objectives related to customer satisfaction at management review meetings.

Top Management also ensures that customer requirements are understood and met. Customer requirements are understood, converted into internal HSEQ requirements and communicated to appropriate personnel within the organization.

Customer complaints and other customer feedback is continually monitored and measured to identify opportunities for improvement. We continually look for other ways to interact directly with individual customers to ensure a proper focus to their unique needs and expectations is established and maintained.

5.2 Policy

Top management ensures that the HSEQ policies are communicated and understood by all employees at all levels of the organisation through documented training, regular communication, and reinforcement during annual employee performance reviews. The policies are made available to all interested parties on request.

All policies are kept electronically and are managed and stored by the H&S Manager

Our HSEQ policy statements act as a compass in providing the direction and framework for establishing key corporate level performance measures and related improvement objectives. Top Management reviews the HSEQ policies during management review meetings to determine the continuing suitability.

5.3 Organization Roles, Responsibility and Authority

An organisational structure is defined in the chart below. The chart shows the interrelation of personnel within the organisation whilst job descriptions define the responsibilities and authorities of each role. Job descriptions and the organizational structure are reviewed for adequacy and approved by Top Management.

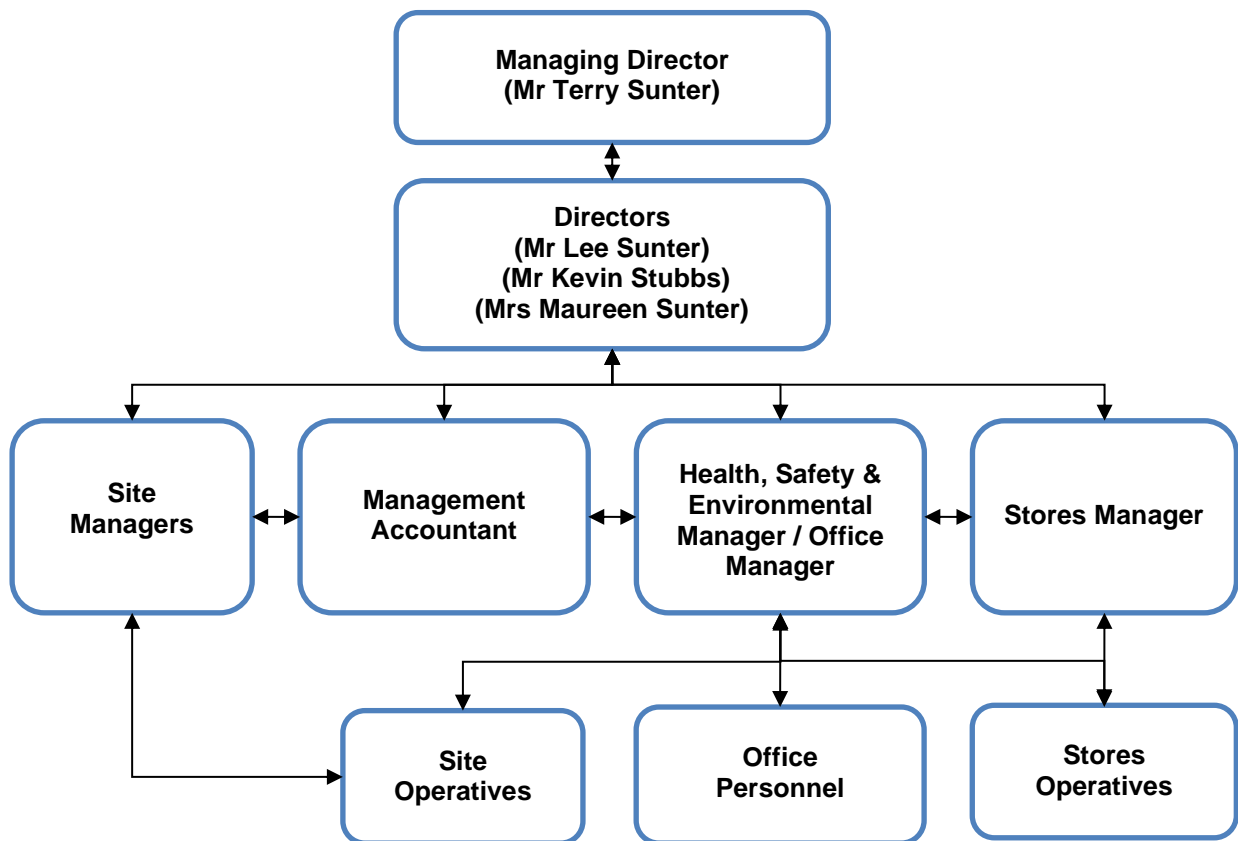
Members of Top Management are ultimately responsible for the HSEQ performance of *Sunter Limited* since they control the systems and processes by which work is accomplished.

Top Management are responsible for business planning, development and communication of our HSEQ policies, HSEQ management system planning, the establishment and deployment of objectives, the provision of resources needed to implement and improve the HSEQ management system and for undertaking management reviews.

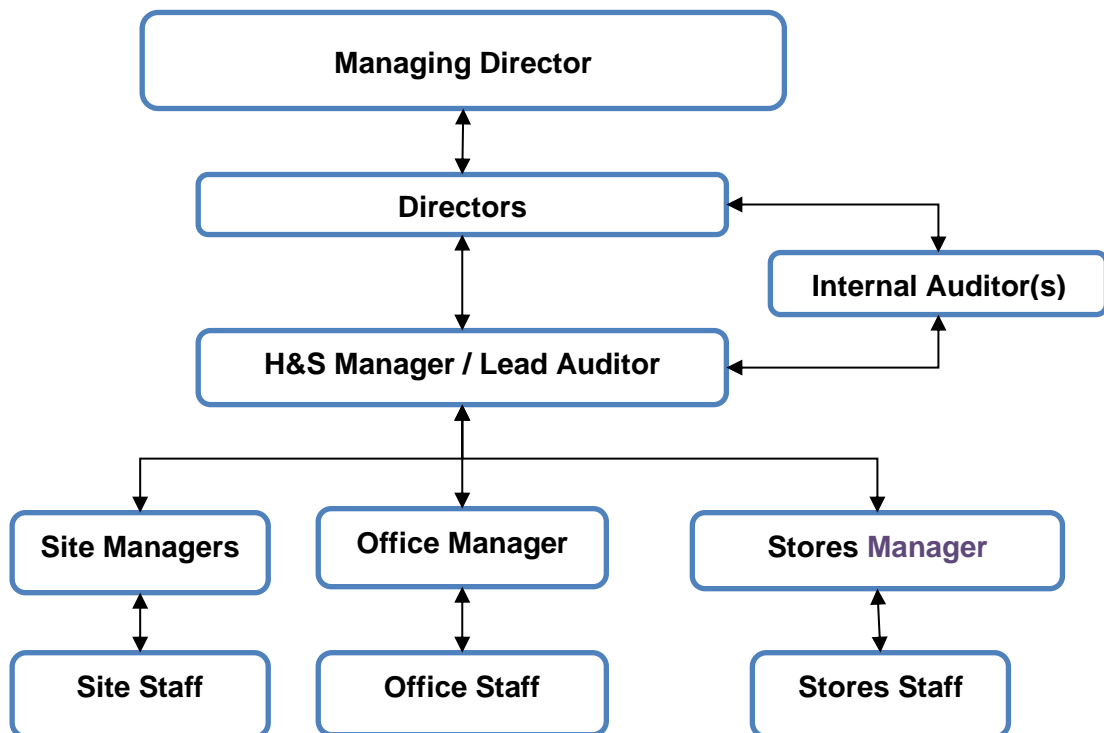
All managers are responsible for execution of operations and the implementation of the HSEQ policies, processes and systems described in this manual. All managers are responsible for planning and controlling HSEQ management system processes within their area of responsibility, including the establishment and deployment of operational level objectives and the provision of resources needed to implement and improve these processes.

All employees are responsible for the successful execution of their work and implementation of the policy and procedures applicable to processes they perform. All personnel have the responsibility to act when HSEQ performance does not match the established requirements. Employees are motivated and empowered to identify and report any known or potential problems and to recommend corrective action.

Sunter Limited Organisation Chart



Sunter Limited Quality, Environmental & Occupational Management Responsibilities



ROLES & RESPONSIBILITIES

The following individuals and/or groups have responsibilities under the IMS. These are to be implemented on all sites and when carrying out all undertakings for the company

Managing Director: Mr Terry Sunter:

The main aim of the Managing Director with regards to the Integrated management System is to provide funding and “Top Management” responsibilities to ensure that the Integrated Management System is implemented and reviewed in-line with current Standards.

Directors: Mr Lee Sunter & Mr Kevin Stubbs:

The role of the Directors with regards to the IMS is to assist the Managing Director in his “Top Management” responsibilities and to ensure all Managers and other Staff are aware that they must co-operate in Internal and External Audits and implement and manage any other aspects of the Standard.

Health, Safety & Environmental Manager: Mr John Walker:

The role of the HS&E Manager is to devise, manage, maintain and implement the Integrated Management System and to inform the Directors/Managing Director of their responsibilities in ensuring the system is fully complied with. Additional duties are to carry out internal audits, act as the Lead Auditor and schedule Internal Audits and liaise with the External Auditor in his/her Audit requirements.

Internal Auditor: Mr Christopher Wallace:

Internal auditors duties are to liaise with the Lead Auditor and carry out Internal Audits to ensure that the Standard is implemented and up-to date. Report any non-conformities or non-co-operation found within audits to the Lead Auditor or Company Director.

Site Managers:

Site Managers have responsibilities to carry out safe management of site activities and co-operate with all company policies, procedures and other documents. They also ensure that any site under their control implements all requirements of the standard and any non-conformity are acted upon and reported to the Safety Manager.

Site Staff:

All site staff are to implement all aspects of the standard during their daily work duties, reporting to the Site Manager and item(s) that they feel may need attention or alteration.

Stores Manager:

The Stores Manager ensures that all materials are ordered when necessary in bulk orders as to reduce the amount of delivery vehicles and excess packaging. Also to manage the re-cycle station and arrange collection of recycled materials. To manage the amount of materials given to site staff and report to Senior Management any non-conformities in the Standard.

Stores Staff:

Stores staff are required to comply with the requirements and instructions given on quality, environmental and safety issues by the Stores Manager or any Senior Member of Staff.

Office Manager:

The office manager is also the HSE Manager and will ensure that all requirements of the Standard are implemented within the office environment.

Office Staff:

To comply with the requirements and instructions given on quality, Environmental and safety issues by the Office Manager or any Senior Member of Staff.

Others (Visitors etc)

All have a duty to comply with any information given the IMS whilst on company premises and/or visiting sites.

6. Planning

6.1 Actions to address risk and opportunity

6.1.1 General

The company has established its business risk assessments and opportunities. The business risk assessments will be analyzed, evaluated and approved by management responsible for the implementation and control of the IMS manual as part of the Management Review process described in section 9.3 of this manual.

Risk Assessment and similar analyses of all the organization's activities that have been identified as relevant to the business and scope of the management system, have been conducted and documented and are detailed in the Business Risk Assessment

6.1.2 Environmental Aspects

Sunter Limited has identified the environmental aspects pertaining to its business operations. This process is managed using the Environmental Procedures as identified within this manual.

The subsequent output from these processes takes account of the severity of the environmental aspects and the company's ability to influence them, in order to determine which are the most significant. The aspects that have an associated significant impact are then considered significant aspects.

The HSEQ is structured to address and manage these significant environmental aspects in order to control or limit the associated environmental impacts.

6.1.3 Compliance obligation

Top management reviews all relevant environmental legislation. Legal requirements are reviewed on a regular basis and when incoming changes dictate. The management review meeting attendees ensure that the environmental aspects identified are understood in terms of relevant legislation.

The above also applies to the Health and Safety regulations and legislations.

6.2 HSEQ objectives and planning to achieve them

Sunter Limited sets out its HSEQ objectives and targets on a regular basis within the management review meeting minutes. Details of program dates and responsibilities are defined. Improvements in HSEQ performance are incremental and in keeping with the size of the company. When setting objectives and targets the company ensures that they are consistent with the HSEQ policies and the significant HSEQ aspects.

In addition, technological options, financial, operational and business requirements are considered. In order to determine whether or not the objectives and targets are being met, they are measured, where practical, to allow progress to be monitored.

6.3 Planning of changes

The HSEQ system has been planned and implemented to meet our HSEQ objectives and the requirements.

The HSEQ planning process involves establishing and communicating our HSEQ policies and objectives through issuance of this manual and its associated procedures. Accordingly, this manual constitutes our overall plan for establishing, maintaining and improving the system. For each instance of HSEQ management system planning, the output is documented accordingly and changes are conducted in a controlled manner.

Our management review and internal audit processes ensure the integrity of our HSEQ management system is maintained when significant changes are planned and implemented which affect key system processes.

Changes of operational processes are controlled through Management of Change documents.

Objectives

Sunter Limited has in place a procedure to show the set objectives across all three elements of the IMS.

These Objectives require formal planning, implementation and monitoring.

Some Objectives are on-going and are continually monitored to ensure they stay in place and enhance the IMS as a whole. Others will be set with implementation/target dates.

The main change to this version of the Integral Management Systems manual is the removal of the Company Objectives from this Manual and the formulation of a stand-alone Company Objectives Policy.

The Company Objectives Policy identifies the set objectives and tracks the progress and performance of the set objective.

This does not detract from the company meeting all set objectives in any way.

7. Support

7.1 Resources

During planning and budgeting processes and as needed throughout the year, Top Management determine and ensure that appropriate resources are available to implement and maintain the HSEQ management system and to continually improve its effectiveness whilst enhancing the interested parties' satisfactions by meeting their requirements.

Implement and maintain the HSEQ-MS

Ensure that resources are maintained in accordance with the Risk Assessment and controls as detailed in the Business Risk Assessment

Ensure that all relevant statutory, regulatory and contractual requirements are identified and addressed as part of the review process

Ensure that Management Reviews are carried out at pre-determined intervals in order to improve and monitor the HSEQ-MS

Ensure that all resources are made available and maintained to provide a suitable environment.

Infrastructure will be provided to ensure conformity to service provision.

Management will maintain organisational knowledge relevant to the service provision offered. This knowledge will be a variety of intellectual knowledge, standards, regulations and the maintaining of personnel knowledge within the business.

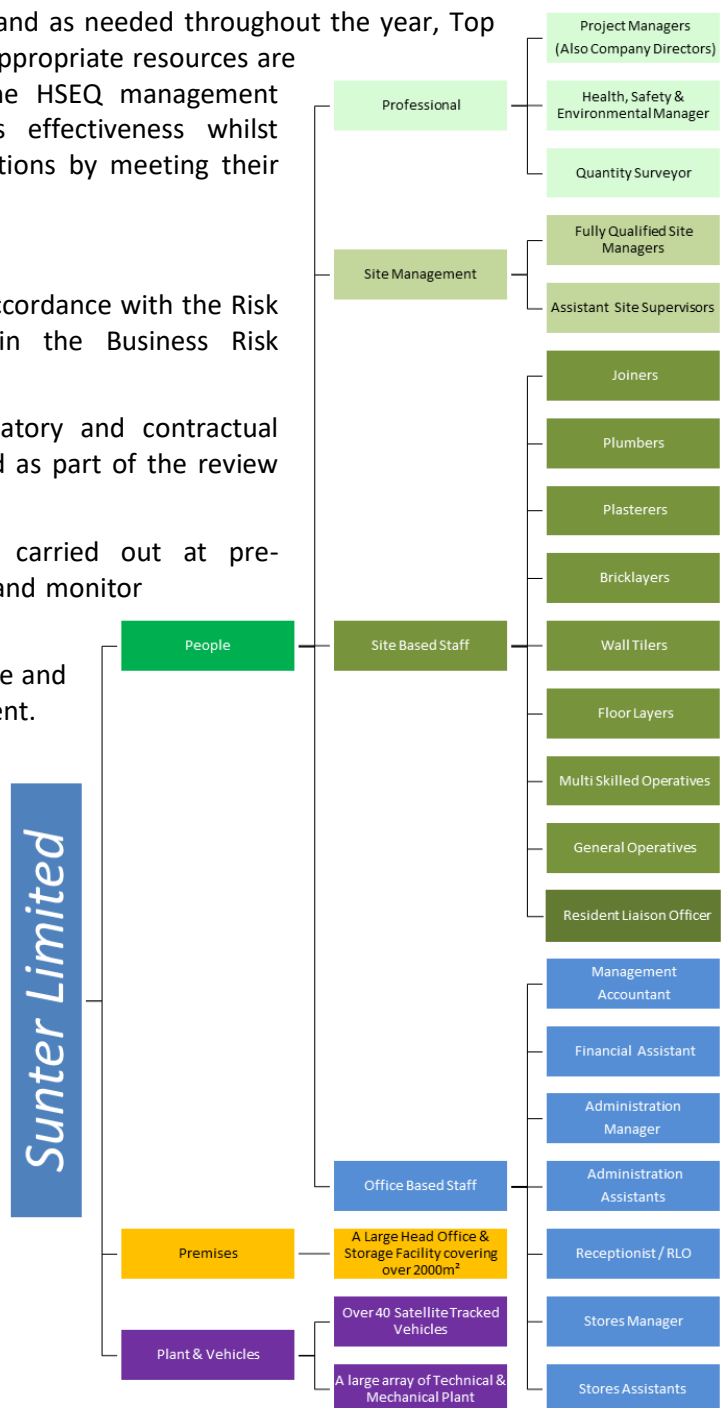
Sunter Limited current resources are identified within the chart as shown on this page.

The chart gives a reflection of the resources that we have including:

- People
- Premises
- Plant & Vehicles

The chart shows the amounts of personnel that we have broken down into individual roles. It also gives an insight into the amount of vehicles that we have and plant/technical equipment that will be used on site.

It also identifies that we have a large Head Office and Storage facility at Hetton-le-Hole where we would plan and implement the contract from.



7.2 Competence

To ensure competence of our personnel, job descriptions have been prepared identifying the qualifications required for each position that affects service quality. Qualifications include desired requirements for education, skills and experience. Appropriate qualifications, along with required training, provide the competence required for each position.

The company operates a formal system to ensure that all employees within the organization are adequately trained to enable them to perform their assigned duties.

Qualifications are reviewed upon hire, when an employee changes positions or the requirements for a position change. The Company maintains records of employee qualifications. If any differences between the employee's qualifications and the requirements for the job are found, training or other action is taken to provide the employee with the necessary competence. The results are then evaluated to determine if they were effective.

Top Management identifies emerging competency needs during management reviews. Emergent competency needs are converted into job descriptions for the type and number of positions that need to be filled through internal or external recruitment.

Where possible; training is conducted in-house, although for more specialist skills, external seminars or courses are utilised. The effectiveness of training is evaluated. The company induction includes an introduction to the company's HSEQ policies statement and objectives. Future training needs are identified as part of the Management Review process.

Training records are maintained to demonstrate competency and experience. The Health & Safety Manager will review the training records annually to ensure completeness and to identify possible future training needs.

Training records are maintained in accordance with this manual and include as a minimum, the following information:

- Copies of certificates for any training undertaken to date
- Copies of formal qualifications
- Registers of internal training

Records include health & safety documentation where applicable

Records include environmental documentation where applicable

7.3 Awareness

All employees are trained and made aware on the relevance and importance of their activities and how they contribute to the achievement of the HSEQ policies, procedures and objectives.

Awareness training will be given to all relevant members of staff. This will take the form of instructions on reading the company policies and procedures and the requirements for compliance, and the possible implications of ignoring or disobeying the controls.

7.4 Communication

Top management are responsible for establishing regular formal and informal communications as needed to convey to their employees the relevance and importance of their activities; typically, this information is conveyed through team meetings, Tool box and cross-functional improvement projects.

Communications regarding how employees contribute to the achievement of objectives is also conveyed and reinforced during employee performance reviews.

Top management shall conduct communication with other interested parties when required in relevant format.

7.5 Documented information

7.5.1 General

This HSEQ manual contains documented statements of our HSEQ policies and quality objectives and references the documented procedures required by the ISO standards and other documents needed to ensure effective planning, operation and control of our key processes.

The level and type of HSEQ management system documentation established for our business is continually reviewed to ensure it remains appropriate for the complexity of the interactions of our core processes and the competence of our employees. HSEQ management system documents and data exist in hard copy and electronic format.

The HSEQ management system documentation includes this HSEQ manual, procedures, forms and other internal and external documents and data needed to manage, perform or verify relevant works.

This manual has been prepared to describe **Sunter Limited** HSEQ management system; its associated procedures, and the processes needed to implement our HSEQ policies in order to achieve our HSEQ objectives. Each section of the manual makes reference to various procedures, forms and process maps relating to the requirements outlined in that section.

7.5.2 Creating and updating

All HSEQ management system documents are controlled according to the Control of Documents Procedure, which defines the process for:

- Approving documents for adequacy prior to issue
- Reviewing and revising as necessary and re-approving documents
- Ensuring that changes and current revision status of documents are identified
- Ensuring that relevant versions of applicable documents are available at points of use
- Ensuring that documents remain legible and readily identifiable
- Ensuring that documents of external origin are identified and their distribution controlled
- Preventing the unintended use of obsolete documents
- Ensuring that documents of external origin are identified and their distribution controlled
- The company uses standard forms and a local area network computer system.

7.5.3 Control of Documented Information

Records are established to provide evidence of conformity to the requirements specified by the standard, customer requirements and of the effective operation of the HSEQ management system are formally controlled through the application of the Control of Records Procedure.

Records, which are controlled, include but are not limited to:

- Corrective Action Reports
- Management Review Reports
- Customer Complaints
- Calibration Records

A Document Control Register is used to identify documents and to ensure that the latest revisions of the documents are used. A formal process is used to identify the requirement of a document and also to ensure it is available for use.

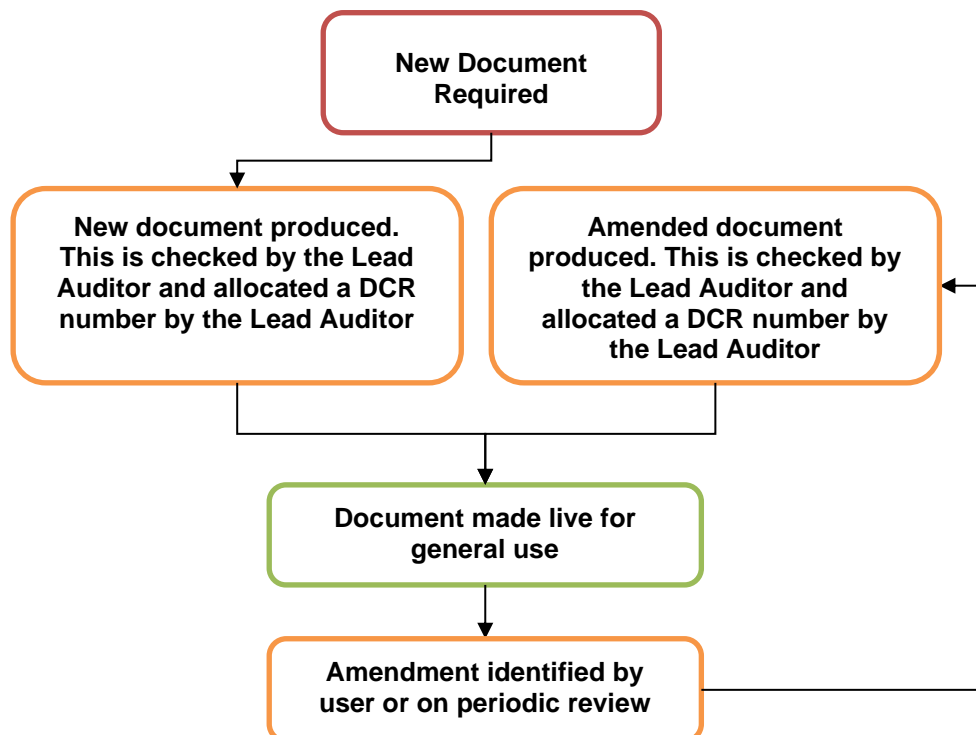
This Document Control Register is located on the F: Drive of the company IT System. This has limited access to minimise the uncontrolled use of all company documentation.

A process for the need of a document, its DCR number allocation and any alteration is in place and is identified within the Process Flow below.

The DCR contains all documentation, including:

- **ISO9001 documentation**
- **ISO14001 documentation**
- **ISO45001 documentation**

Document Process Flow



8. Operation

8.1 Operational planning & Control

The company has established documented HSEQ plans and procedures that describe processes and controls to be applied and the records required. During this planning phase, management or assigned personnel will identify:

- The HSEQ objectives and requirements for the service are developed for all new projects
- Verification, validation, monitoring, inspection and test requirements
- Processes, documentation and resources required
- Criteria for service acceptance
- Resources necessary to support operation and maintenance of the product
- The output of HSEQ planning includes documented HSEQ plans, resource requirements, processes, equipment requirements, procedures and design outputs.

8.1 Operational planning & Control

The company has established documented HSEQ plans and procedures that describe processes and controls to be applied and the records required. During this planning phase, management or assigned personnel will identify:

- The risks to the environment from business activities
- Actions required to mitigate those identified risks
- Implement all required actions through the policies and procedures
- When considering the life cycle approach, the aspects and impacts of the business activities will be considered
- Relevant assessments will be carried out to understand, control and mitigate environmental risk.

8.1 Operational planning & Control

The company has established documented HSEQ plans and procedures that describe processes and controls to be applied and the records required. During this planning phase, management or assigned personnel will identify the following:

- The requirements placed on the business relevant to Health & Safety
- How to mitigate and control the health & safety risks
- The information on the risks, control and reduction will be provided to all personnel

8.2 Requirements for Product and Services

8.2.1 Customer communication

In accordance with our commitment to exceed our customer's expectations, ***COMPANY NAME*** , highlight effective customer communication as an essential element of customer satisfaction. Appropriate handling of customer communication will help to reduce customer dissatisfaction and in many cases turn a dissatisfying scenario into a satisfying experience.

The Managing Director is responsible for establishing communication methods to ensure enquiries, contracts or order handling; including amendments, customer feedback and complaints are handled expeditiously and professionally.

The Office Manager is the primary customer contacts for current operations.

The Director is committed to addressing all documented customer enquires that reside within the organization's system. The Director has the primary responsibility to address all customer related issues in regard to the quality of our products and services. The Director is the key contact in regard to questions pertaining to the company's total HSEQ management system.

Customer requirements include the following:

- Requirements not stated by the customer but necessary for specified use or known and intended use
- Statutory and regulatory requirements related to the services
- Requirements required for delivery and post-delivery activities
- Additional requirements determined by **Sunter Limited**

8.2.2 Determining the requirements for products and services

Sunter Limited determines customer requirements before acceptance of an order.

Customer requirements include the following:

- Requirements not stated by the customer but necessary for specified use or known and intended use
- Statutory and regulatory requirements related to the product or services
- Requirements required for delivery and post-delivery activities
- Additional requirements determined by **Sunter Limited**

8.2.3 Review of the requirements for product and services

Prior to committing to the customer, **Sunter Limited** have a process in place for the review of requirements related to the product. The review is conducted before the order is accepted.

The process ensures that:

- Product requirements are defined
- Contract or order requirements differing from those previously expressed are resolved
- **Sunter Limited** has the ability to meet the defined requirements
- Records are maintained showing the results of the review and any actions arising
- Customer requirements are confirmed before acceptance

When product requirements are changed, the organization communicates changes to personnel and amends relevant documents like safety data sheet (SDS)

8.2.4 Changes to requirements for products and services

Any and all changes to the services offered will be documented and all relevant parties will be informed. This can be controlled in any of the following ways:

- Management of Change Procedure
- Internal MEMO's
- Change to customer agreements/contracts
- Change to procedures and work instructions
- Changes to site rules

All changes must be formally communicated to the relevant parties with a transition period taken into account.

8.2 Emergency preparedness and response

The company has reviewed the risk of all possible emergency situations and the consequences. Emergency response plans have been documented to control and manage any emergency situation. In order to ensure that the plan can be implemented in full the following actions have been taken:

Emergency plan (EERP) has been reviewed and approved by the top management

Infrastructure and resources have been provided to enable the emergency plan to be successfully initiated

All relevant personnel have been trained in the emergency plan

Emergency drills will be arranged to test the continued suitability of the emergency plan

The emergency plan takes into consideration the results of environmental impact assessments

The emergency plan will be shared with all interested parties

8.2 Emergency preparedness and response

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Emergency plan (EERP) has been reviewed and approved by the top management

Infrastructure and resources have been provided to enable the emergency plan to be successfully initiated

All relevant personnel have been trained in the emergency plan

Emergency drills will be arranged to test the continued suitability of the emergency plan

The emergency plan takes into consideration the results of risk assessments

The emergency plan will be shared with all interested parties

8.3 Design and Development of Products and Services

Sunter Limited do not offer design and development of and therefore this is excluded from the management system.

8.4 Control of Externally provided processes, products and services

8.4.1 General

The purchasing process is essential to **Sunter Limited** ability to provide our customers with products that meet their requirements. **Sunter Limited** ensure that purchased product conforms to specified purchase requirements. **Sunter Limited** accomplish this by closely working with our supplier base (e.g. periodic audits and surveys) and inspecting purchased product as required. The type and extent of control applied to the supplier and the purchased product is dependent upon the effect of the purchased product on subsequent product realization or the final product.

The control of sub-contractors is essential at all times. As such, formal methodical procedures are in place to ensure all contractors are competent, experienced and viable to carry out works in the **Sunter Limited** name.

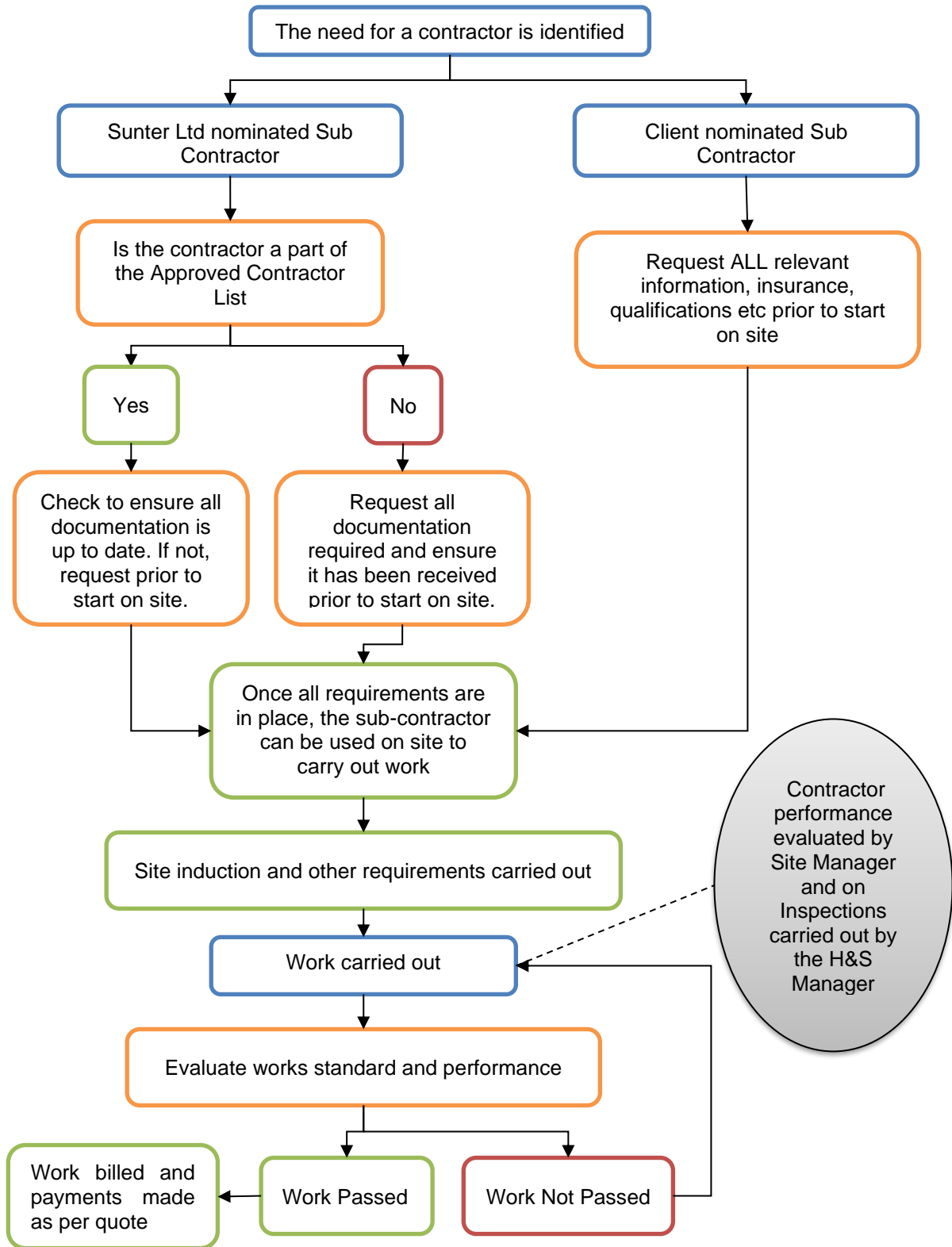
When selecting a sub-contractor Sunter Limited are looking for a long-term partnership.

The core sub-contract list that Sunter Limited are associated with have been in long term partnerships for over 5 years.

All sub-contractors are required to submit all required documentation prior to commencement on site. The subcontractor is expected to comply with all the relevant health and safety requirements on site as well as abide by all **Sunter Limited** policies and procedures.

Please Note: Some sub-contractors are not selected by Sunter Limited. They are nominated by the client.

A sub-contractor assessment process flow and work process is shown below.



8.4.2 Type and extent of control

It is the responsibility of the Staff Officers to evaluate and select suppliers based on their ability to supply product in accordance with specified requirements, to be approved by Managing Director. Additionally, other internal resources may be called on to assist as required. Criteria for selection, evaluation and re-evaluation are defined in the supplier evaluation procedure. Records of the results of evaluations and any necessary actions arising from the evaluation are maintained within the company documentation system.

External providers will be risk assessed to determine their importance and possible effects on the business by not providing the required service. Selection of the external provider can be based on ability to provide service, cost, historical use and nature of service e.g. specialist.

Where it is part of the customer requirements to use a nominated external provider, they will be communicated with but not necessarily subjected to the selection or risk process. Records of their performance may be retained for feedback to the customer.

8.4.3 Information for External providers

Sunter Limited will ensure that purchased product conforms to specified purchase requirements. Suppliers are selected based on their ability to supply products in accordance **Sunter Limited** requirements and/or regulatory. Criteria for selection and periodic evaluations are performed and determined by the company. The results of these evaluations are documented.

8.5 Production and Service provision

8.5.1 Control of Production and Service provision

Sunter Limited will control service operations through information that specifies the characteristics of the service; the use of measuring and monitoring devices; implementation of monitoring and measurement activities and through a process of service reviews.

Processes directly affecting the quality of the service to the customer are identified, planned, defined, documented and reviewed with appropriate personnel and approved prior to use. Equipment used in these processes is maintained appropriately. Process control is defined and monitored. Documented instructions include step-by-step operations in sufficient detail to provide each department with adequate information to perform the work specified requirements.

8.5.2 Identification and Traceability

In order to preserve the conformance of products to customer requirements during internal processing and delivery, **Sunter Limited** identifies the product throughout the product realization process in accordance with the Identification & Traceability Procedure.

Stored equipment and products are identified as to type, description and inspection status

Unacceptable items are identified as such and are removed from the normal work flow

All enquiries are identified with a unique estimate number, allocated on receipt

Subsequent orders are identified by contract number

8.5.3 Property belonging to Customers or External providers

In cases where the customer provides drawings, specifications, etc. they are logged as per the Control of Document Procedure. Customer property can also include customer-owned materials, tools (including returnable packaging), tooling (including test/inspection tooling and equipment), and intellectual property. We identify, verify, protect and maintain customer property provided for use.

The Managing Director ensures that lost, damaged or unsuitable customer property is recorded and immediately reported to the customer.

8.5.4 Preservation

Sunter Limited ensure that all products and materials are handled and stored appropriately at all stages to prevent damage:

Components and products are handled and stored in a manner that prevents damage or loss pending use or delivery

Each Department ensures controls are implemented to prevent mixing conforming and non-conforming materials

All components/products are suitably transferred by suited pipelines to prevent contamination or damage during storage and delivery

8.5.5 Post-delivery activities

Prior to committing to the customer, **Sunter Limited** have a process in place for the review of requirements related to the product. The review is conducted before the order is accepted.

The process ensures that:

- Product requirements are defined
- Contract or order requirements differing from those previously expressed are resolved
- **Sunter Limited** has the ability to meet the defined requirements
- Records are maintained showing the results of the review and any actions arising
- Customer requirements are confirmed before acceptance

8.5.6 Control of Changes

When product requirements are changed, the organization shall communicate and document changes to personnel & related parties and amends relevant documents like safety data sheet (SDS)

8.6 Release of Products and Services

The Managing Director has overall responsibility for planning and implementing the inspection and test activities needed to verify that product requirements are met at appropriate stages of the product realization process.

Products are not used until they are inspected or verified as conforming to requirements, except when the product is released under positive-recall procedures pending completion of all required measurement and monitoring activities.

When the organization uses (external) sampling inspection as a means of product acceptance, the plan is statistically valid and appropriate for use. The plan precludes the acceptance of lots whose samples have known nonconformities. When required, the plan is submitted for customer approval.

Evidence of conformity with the acceptance criteria is maintained. Records indicate the person authorizing the release of the product. Product release and service delivery does not proceed until all the planned arrangements have been satisfactorily completed, unless otherwise approved by a relevant authority, and where applicable by the customer.

Measurement requirements necessary for product acceptance are documented; subsequent acceptance records form the storage documentation evidence. Storage documentation evidence includes the following data:

Criteria for acceptance and rejection

Locations in the process sequence where measurement and testing operations were performed

Types of measurement instruments used, including any instructions associated with their use

Test records showing actual test results data where required by the specification or acceptance test plan

8.7 Control of nonconforming outputs

It is the company's policy to detect, control and rectify any aspect of non-conformance as quickly and efficiently as possible. Where necessary, any material, product or service that does not conform to specified requirements is properly identified and controlled to prevent unintended use or delivery. Improvements are then implemented to ensure the non-conformance does not reoccur.

Sunter Limited ensure that products, which do not conform to specified requirements, are identified and controlled to prevent unintended use or delivery. The controls and related responsibilities and authorities for dealing with non-conforming product are defined in the Control of Nonconforming Procedure (P.3.20).

9. Performance Evaluation

9.1 Monitoring, Measurement, Analysis and Evaluation

9.1.1 General

The Organisation shall evaluate the performance and the effectiveness of the HSEQ management system.

The HSEQ is monitored, measured, analysed and evaluated by application of the procedures documented in Section 9.2 (Internal Audits) and Section 9.3 (Management Review).

9.1.2 Customer satisfaction

The Directors monitor information relating to customer perception as to whether the organization has fulfilled customer requirements.

Customer complaints, whether received in writing, verbally or through the telephone are immediately forwarded to the Managing Director for direct action. If the problem cannot be resolved, the complaint is transferred to the Office Manager for resolution.

Customer survey data along with other customer feedback, including written or verbal complaints and information collected via the customer feedback form are reviewed by the Management Representative who initiates appropriate corrective actions needed.

Customer satisfaction is monitored in various ways:

- Product contamination
- Analysis of customer complaints
- Customer satisfaction surveys
- Demurrage in shipping and trucking
- Recognition and awards
- Growth of key accounts
- On-time delivery

9.1.2 Evaluation of compliance

Top management will take a lead role in ensuring that compliance in all areas is reviewed, controlled and maintained. The level of compliance and areas of compliance will be determined by the top management and reviewed at regular intervals. Each person is responsible for compliance in their own area of operation.

Evaluation of compliance will managed in the following ways:

- Continual monitoring of HSEQ requirements
- Reviews at all levels of the business to ensure local, national and international compliance is monitored
- Implement processes in the business to evaluate compliance
- Implement processes to correct any compliance deficiencies and prevent recurrence

9.1.3 Analysis and evaluation

Top Management and staffing collect and analyze data using appropriate statistical techniques to determine the suitability and effectiveness of key quality management system processes applicable to their area(s) of responsibility and to identify opportunities for improvement. At a minimum, data is analyzed to assess achievement of the corporate level quality objectives and customer requirements.

A process is effective if the desired results are measurably achieved. Effectiveness is measured in terms of product quality, process accuracy, delivery schedule performance, cost and budgetary performance, employee function performance against established objectives and customer satisfaction. In order to identify trends and opportunities, **Sunter Limited** monitors trends in the following activities:

- Characteristics of processes, products and their trends
- Conformity to product requirements
- Customer Satisfaction data
- Suppliers
- Other interested parties

Employees utilizing statistical tools to manage, verify or perform work will have attended an overview on basic concepts to ensure they are understood and properly utilized throughout the organization.

9.2 Internal Audit

Internal audit results are critical inputs that help in assessing the effectiveness of the quality management system by identifying opportunities for improvement, by promoting awareness of customer requirements and by measuring the effectiveness of the HSEQ management system.

Sunter Limited conducts internal audits at planned intervals on all HSEQ management systems to determine whether the HSEQ management system conforms to the planned arrangements. **Sunter Limited** will then determine if the HSEQ management system is effectively implemented and maintained.

The Internal Audit Procedure details the requirements for developing the audit program including the requirements for planning; taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits.

The audit criteria, scope, frequency and methods are defined by the audit plan. The selection of auditors and their conduct ensures objectivity and impartiality throughout the audit process.

Process owners do not audit their own work. In cases where it is not possible to conduct an objective audit; the services of independent external auditor will be sought.

The aim of **Sunter Limited** internal audit procedure is to define the manner in which all internal environmental audits are scheduled, executed, followed up and recorded. Effective implementation of this procedure should deliver the following benefits:

- Establish whether effective operational controls are in place in order to meet customer requirements
- Identify opportunities for improvement and training requirements
- Establish the effectiveness of communication channels
- Maintain conformance to ISO 14001 requirements

Roles & Responsibilities

Lead Auditor: The responsible for scheduling audits falls on the Lead Auditor, his duties include carrying out some of the audits on the schedule, controlling the schedule and making sure the audits are carried out to an acceptable standard, and reporting audit findings to management. The Lead Auditor is the first point of arbitration in the event of an auditor/auditee disagreement.

Auditor: Responsible for carrying out audits to schedule and to an acceptable quality, for ensuring that audit reports are sufficiently detailed to enable analysis by others and for verifying effective closure of identified non-conformances.

Corrective Action

Corrective action is required on all audit non-conformances raised. The auditee is responsible for deciding on the course of corrective action, the internal auditor is responsible for verifying its effective implementation. Corrective action should wherever economically viable reduce or eliminate the chance of recurrence. The audit program manager is responsible for reviewing corrective action status on a periodic basis to ensure that there are no undue delays in carrying out the corrective action.

Preventive Action

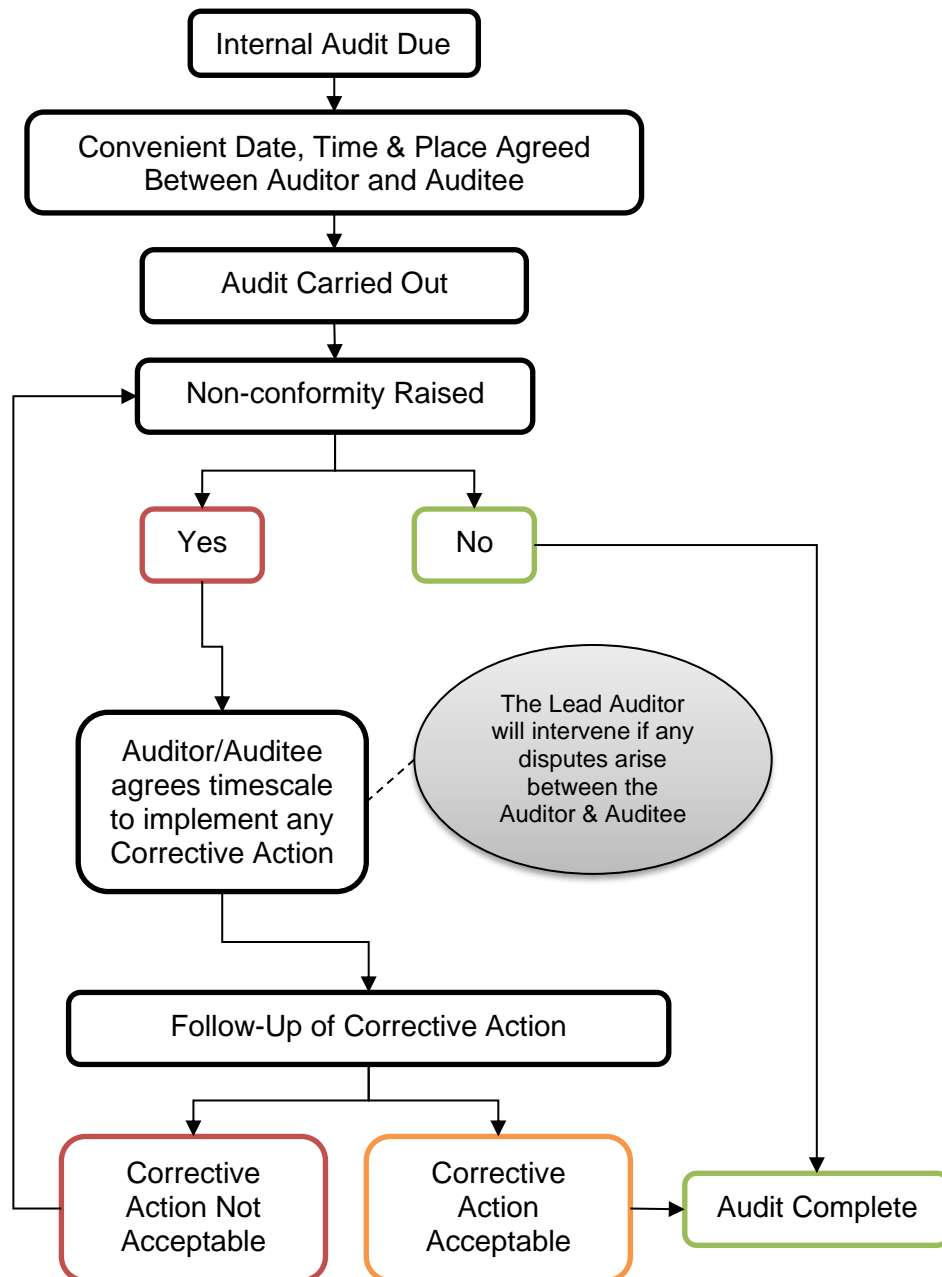
Audit non-conformances shall be summarised periodically and presented at performance review meetings. Those present shall assess the potential for preventive actions to be applied through consideration of the summarised findings. For example to consider whether a problem identified and resolved in one area can potentially arise in another area, and so assess the need for preventive action outside of the problem area

Internal Audit Schedule – By Month

The table below shows the scheduled months of internal Audits. Specific dates within that month will be determined at the beginning of the named month. This flexibility allows for the Auditor and Auditees work load to be taken into consideration.

IMS No	Latest Audit Date	Audit Frequency	Scheduled Audit Month
1.0	Purpose & Scope	12 Months	TBC
2.0	Normative References	12 Months	TBC
3.0	Terms & Conditions	12 Months	TBC
4.0	Organisation	12 Months	TBC
5.0	Leadership	12 Months	TBC
6.0	Planning	12 Months	TBC
7.0	Support	12 Months	TBC
8.0	Operation	12 Months	TBC
9.0	Evaluation	12 Months	TBC
10.0	Improvement	12 Months	TBC

The following flowchart the method of arranging and carrying out Internal Audits



9.3 Management Review

9.3.1 General

Top Management conducts a management meeting between all office staff periodically. These are not set to a planned timetable and are carried out to assess all business needs of the company.

A part of the agenda is the continued compliance to the ISO Standards. These are assessed and reported on by the H&S Manager to ensure the continuing suitability, adequacy, and effectiveness of our HSEQ management system.

The primary inputs reviewed include data that measures the conformance and performance of our HSEQ management system and recommendations based on analysis of such data.

Conformance is primarily assured through internal audits and demonstrated through a review of audit results and our demonstrated ability to correct and to prevent problems.

Performance is primarily assured through the deployment of corporate and operational level objectives, and through a review of our demonstrated ability to achieve desired results.

The primary outputs of management review meetings are management actions taken to make changes or improvements to our HSEQ management system and the provision of resources needed to implement these actions.

9.3.2 Management review inputs

Assessment of the HSEQ management system is based on a review of information inputs to management review. These inputs include the following.

Items in Black are generic to all three Standards: ISO9001:2015 Quality Management / ISO14001:2015 / ISO45001:2018

Items in Green are specific to ISO14001:2015 Environmental Management Standard

Items in Purple are specific to ISO45001:2018 Health & Safety Standard

- The status of actions from previous management reviews;
- Changes in external and internal issues that are relevant to the integrated management system;
- The needs and expectations of interested parties, including compliance obligations and Legal Requirements;
- Results of evaluation of compliance with legal requirements and other requirements
- Information on the performance and effectiveness of the integrated management system,
- Customer satisfaction and feedback from relevant interested parties (Customer/staff complaints etc.
- The extent to which Quality, Environment and OH&S objectives have been met;
- Process performance and conformity of products and services;
- Nonconformities and corrective actions;
- Monitoring and measurement results;
- Audit results (internal / external / customer / HSE / Environmental Agency);
- The performance of external providers;
- The adequacy of resources;
- Consultation and participation of workers;
- The effectiveness of actions taken to address risks and opportunities
- Its significant environmental aspects;
- Fulfilment of its compliance obligations;
- Incidents, nonconformities, corrective actions and continual improvement;
- Opportunities for improvement.

9.3.3 Management review outputs

During management review meetings, Top Management will identify appropriate actions to be taken regarding the following issues:

- Improvement of the effectiveness of the quality management system and its processes
- Improvement of product related to customer requirements
- Resource needs

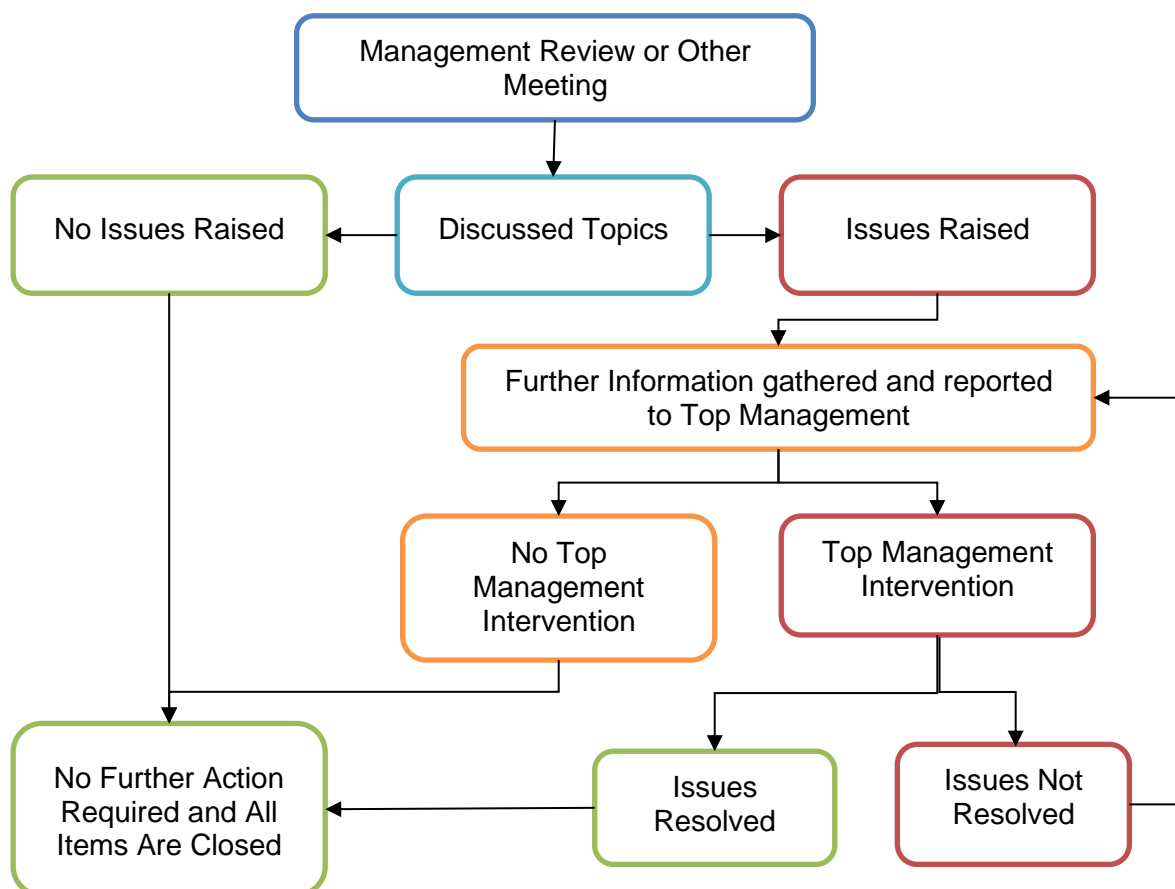
The primary outputs of management review meetings are management actions taken to make changes or improvements to our quality management system and the provision of resources needed to implement these actions.

Responsibilities for required actions are assigned to members of the management review team. Any decisions made during the meeting, assigned actions, and their due dates are recorded on the management review presentation.

Any decisions made during the Management Review Meetings will be implemented and communicated to all relevant parties, including any external parties.

The Management of the Company wish to continually improve the IMS and will actively monitor the system and oversee all decisions made by the Audit Team.

Management Review Process Flow



10. Improvement

10.1 General

All activities not meeting the requirements of the Business Risk Assessments are recorded and investigated in order to establish their cause.

10.2 Nonconformity and Corrective action

Evidence of non-conformance, customer dissatisfaction or process weakness is used to drive our corrective action system. Since problems may exist, they will require immediate correction and possible additional action aimed at eliminating or reducing the likelihood of its recurrence.

Management with responsibility and authority for corrective action are notified promptly of product or process non-conformities. Investigating and eliminating the root cause of these failures is a critical part of our continual improvement process.

Sunter Limited takes action to eliminate the cause of non-conformities in order to prevent recurrence. Corrective actions are appropriate to the effects of the non-conformities encountered.

The documented Corrective Action Procedure defines the requirements for:

- Reviewing non-conformities (including customer complaints)
- Determining the causes of non-conformities
- Evaluating the need for action to ensure that non-conformities do not recur
- Determining and implementing action needed
- Records of the results of action taken
- Reviewing corrective action taken

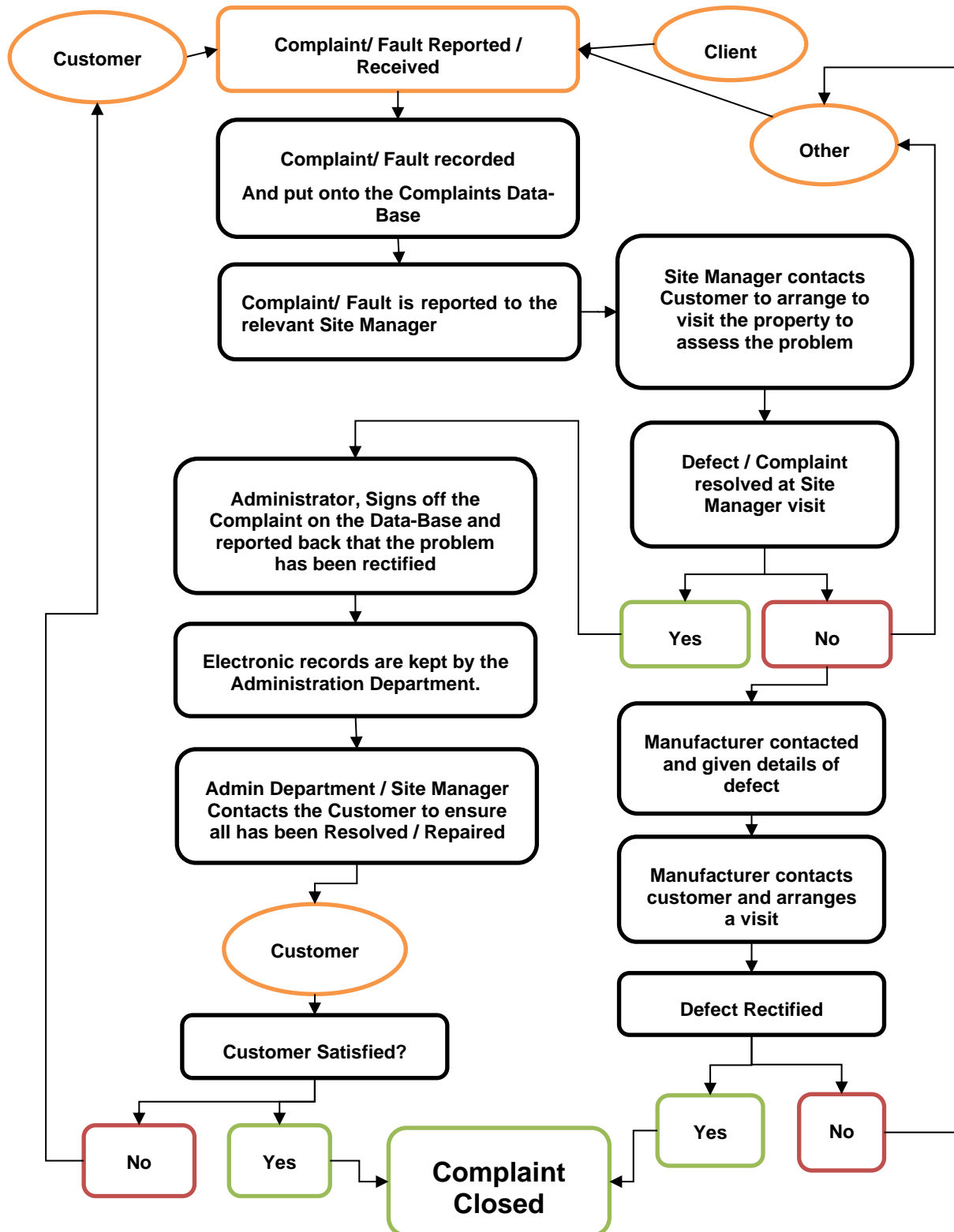
Follow-up audits are conducted to ensure that effective corrective action is taken and that the action is appropriate to the impact and nature of the problem encountered. In addition, the Management Representative summarizes and analyzes corrective action data to identify trends in order to assess the overall effectiveness of the corrective action system and to develop related recommendations for improvement.

The corrective actions are considered effective if the specific problem was corrected and data indicates that the same or similar problems have not recurred. Results of data analysis and subsequent recommendations are presented to Top Management for review.

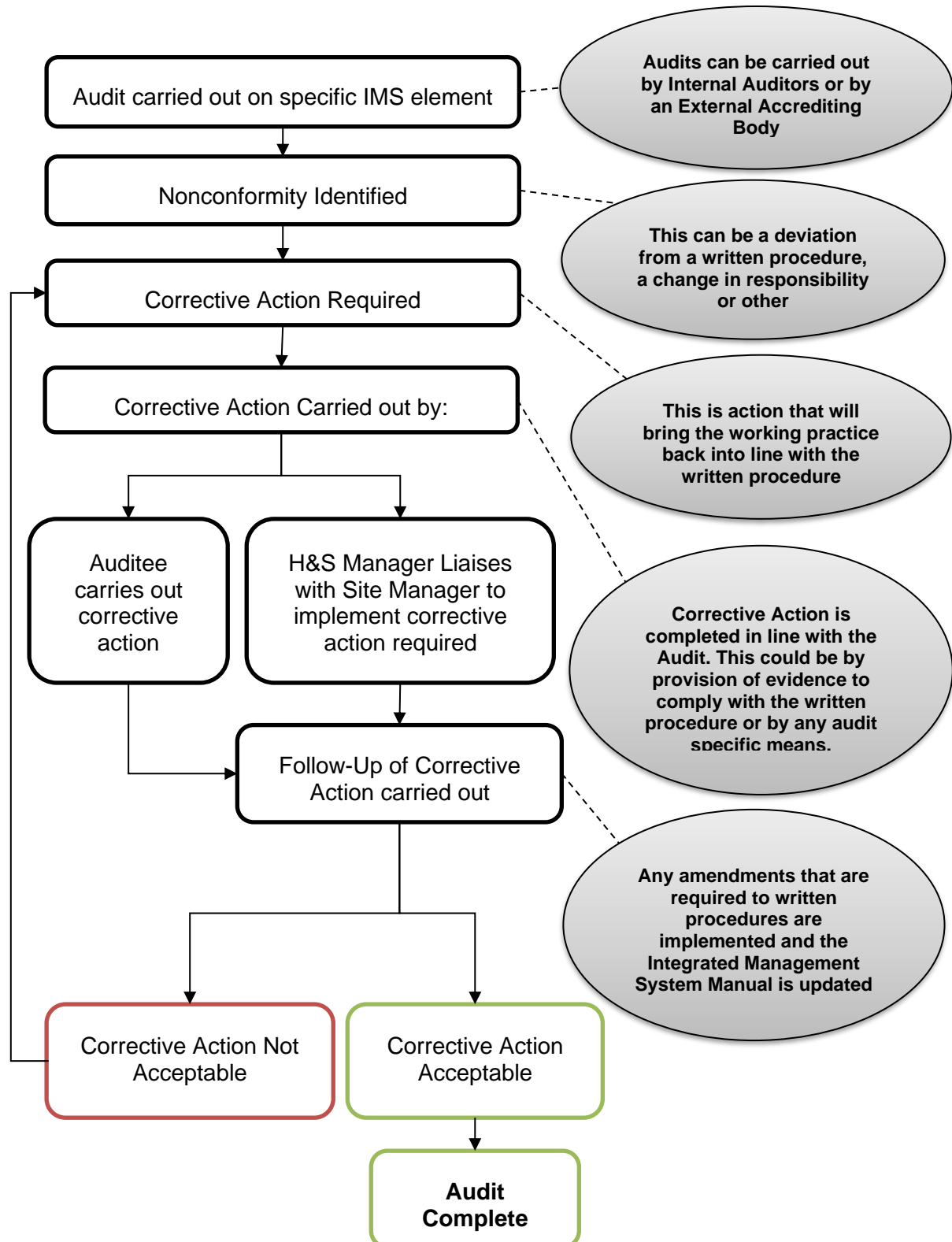
The following flowcharts show the method of:

- Dealing with complaints received from Customers
- Identifying and correcting and nonconformities on internal audits, giving an explanation of the steps contained within the process.

Process for dealing with potential complaints and/or faults received from Customers



Non-conformity, corrective action and preventative action process flow



10.3 Continual improvement

The company continually improves the effectiveness of its HSEQ management system through the effective application of the policy, objectives, auditing and data analysis, corrective and preventive actions and management reviews.

The continual improvement process begins with the establishment of our policies and objectives for improvement, based on objectives contained in our business plan and customer targets and goals.

Customer satisfaction, internal audit, process and product performance data, and the cost of poor quality are then compared to progress against objectives or KPI to identify additional opportunities for improvement.

The overall effectiveness of continual improvement program (including corrective and preventive actions taken as well as the overall progress towards achieving corporate level improvement objectives) is assessed through our management review process.