SAFETY HEALTH

AND ENVIRONMENTAL

MANUAL
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Management Representative
Scope:
The scope of the management systems is:

Activities associated with the stockholding of speciality steels at Bohler Uddeholm, Taylors Lane, Oldbury, West Midlands, B69 2BN.
MANAGEMENT SYSTEMS

Management Review
The Company holds a Management Review Meeting at least once a year to review the effectiveness of the Systems in satisfying the requirements of ISO 14001 and OHSAS 18001, and the associated policies and objectives and targets.

SHE Meetings
A monthly SHE Meeting is held comprising of representatives across the Company to review SHE performance, drive continuous improvement and consult with employees on SHE matters.

Workplace Inspections
Monthly Warehouse and three-monthly Office workplace inspections are conducted and documented by the QHSE Coordinator.

SHE Accidents, Incidents and Near Misses
SHE accidents, incidents and near misses are recorded and fully investigated to identify route causes and try to eliminate them being repeated.

SHE Action List
All actions identified from various sources are documented on the SHE Action list. Each action is assigned a person to complete the action and a completion date.

Audits
The Systems are audited at least once per annum to ensure the standards are being adhered to and the requirements fulfilled.

Communication
SHE matters are communicated to staff through SHE Notice Boards, memos, tool box talks, and all documents are available on the Company’s ‘all drive’.

ORGANISATION STRUCTURE
Separate Organisation charts are documented in the Company’s ‘all drive’. The HR Manager is responsible for updating the details as changes occur.
Safety Health and Environmental (SHE) Roles and Responsibilities

Directors / Management Team
− establish overall SHE direction for the Company
− regularly review progress and set top level objectives
− conduct an annual Management Review Meeting of the Environmental and Health and Safety Management Systems
− ensure the availability of resources to meet the requirements of the Management Systems

Operations Manager
− responsible for the day to day performance Health Safety and Environment at Bohler Uddeholm
− responsible for the maintenance of the SHE Management Systems
− report to the Directors / Management Team on SHE performance
− review SHE implications of any new projects

Managers
− Within their areas of responsibility, Managers to:
− demonstrate by action and example a positive SHE attitude
− ensure conformance of SHE requirements for all personnel within their department, including visitors and contractors
− monitor and review SHE performance linking into KPIs
− ensure the availability of competent resources and appropriate supervision to meet the requirements of the Management Systems
− ensure compliance with relevant legislation, regulations and other requirements as detailed within the Management Systems
− ensure objectives and targets are completed
− ensure comprehensive investigations into any SHE incidents are carried out and appropriate corrective actions are implemented
− ensure corrective actions are completed within agreed timeframes
− review SHE performance within employee reviews

Quality Health Safety and Environmental Coordinator
− provide competent advice and extra resource for Managers to enable them to fulfil their responsibilities as above
− work with Managers to facilitate the efficient and effective running of the SHE Management Systems
− provide monthly SHE performance information to Managers
− Monitor SHE activities to ensure practises are in line with the Company’s Policies and Procedures.
− management of SHE documents and records
− planning and organising internal audits
– coordinate the monthly SHE audits
– monitor compliance with relevant SHE legislation, regulations and other requirements, and communicate to Managers
– Liaise with external bodies, e.g. Accreditation Companies, Fire Brigade, South Staffordshire Water, and Environment Agency.
– review SHE training needs in liaison with HR / Managers

**Supervisors / Team Leaders**

– Within their Teams to:
  – demonstrate by action and example a positive SHE attitude
  – communicate SHE awareness / requirements at all times
  – ensure SHE requirements are followed at all times
  – ensure new or temporary employees are made fully aware of the SHE requirements
  – ensure established safe systems of work are followed
  – ensure employees are trained for the work they are carrying out
  – ensure PPE is worn as detailed by the risk assessments
  – ensure equipment inspections and informal daily workplace inspections are carried out and any problems remedied without delay
  – ensure prompt action is taken in the event of a SHE incident occurring
  – report any potential health and safety or environmental issues to management without delay

**Safety Health and Environmental Team**

– review performance against SHE KPIs
– review any non conformities, and any SHE incidents
– review details of monthly audits
– review implications of any new legislation
– monitor progress of corrective actions

**Purchasing Manager**

– manage all waste streams to ensure compliance with environmental legislation
– question key suppliers in order to verify their SHE practises and performance, raising any concerns with the Operations Manager as required

**HR Manager**

– coordinate SHE Induction and training in liaison with the QHSE Coordinator and Managers
– maintain SHE training records

**Auditors**

– prepare conduct and write up audits
– discuss findings with the relevant manager
– agree timescales for corrective or preventative actions with the relevant manager
– full communication of the audit findings with the QHSE Coordinator
All employees
  – comply with all SHE requirements detailed in the Management Systems
  – report any SHE incidents without delay to their Line Manager

Contractors
  – comply with all relevant SHE legislation
  – be competent to carry out the work and minimise the risk of a SHE incident occurring
  – complete and adhere to the Contractors Pack and any other requirements specified by Bohler Uddeholm management
LIST OF CONTROL DOCUMENTS

All SHE Procedures, Documents and Risk Assessments are version controlled and the List of Control Documents matrix is available to all employees on the ‘all drive’. The QHSE Coordinator is responsible for updating the details as necessary.
Bohler Uddeholm is a speciality steel stockholder based in the West Midlands providing material to a number of applications, including traditional Toolsteel, and Engineering steels to the Petrochemical, Offshore Oil and Gas, Auto-sport and Aerospace sectors.

Bohler Uddeholm is committed to continually improving the environmental performance of its operations and operating its business in support of the aims of this Policy.

Environmental Aims:

1. To manage our activities, products and services with consideration for the environment
2. To ensure the Company complies with all relevant environmental legislation and other requirements to which the Company subscribes
3. To set and regularly review environmental objectives and targets
4. To prevent pollution, and efficiently use materials, water and energy on-site
5. To minimise the creation of waste and maximise its re-use and recycling where practicable
6. To ensure employees receive appropriate environmental training such that they are competent to control the activities they are responsible for
7. To promote improved environmental performance through communication of our Environmental Policy, and engagement with our key suppliers and other interested parties
8. Communicate the Policy to all employees and key Contractors

Tom Gowans
Managing Director

June 2012
HEALTH AND SAFETY POLICY STATEMENT

1. The Company is committed to preventing injury and ill health, and will comply with its legal requirements and other requirements to which the Company subscribes that relate to its hazards. The Company will strive to continually improve its health and safety management and performance. This will be achieved by the implementation of a Health and Safety Management System that incorporates the setting of objectives and targets, and regularly reviews progress. Appropriate training and information and the necessary resources will be provided to meet the objectives.

2. It is an important duty of this Company, in the conduct of its business operations, to ensure a safe and healthy working environment for all its employees. The Company accepts the fact that this implies the corresponding duty of ensuring that the necessary organisation, equipment and training are provided to fulfil this obligation. An effective Health and Safety Policy requires the full collaboration and co-operation of all employees and, therefore, everybody is asked to read this document and accept their own personal responsibility for Health and Safety at work.

3. It is the responsibility of management and supervision:
   a. to promote the spirit and the letter of the principles and provisions incorporated in the relevant legislation to ensure that safe systems of work and a safe and healthy working environment exists; adequate resources will be made available to ensure the success of this Policy;
   b. by consultation and joint involvement of management and employees, to enlist the active interest, participation and support of employees in promoting good standards of Health and Safety at Work;
   c. to ensure that all concerned are fully aware of their own personal responsibilities for Health and Safety at Work:

3. It is the responsibility of every employee:
   a. to take all reasonable care for the health and safety of himself and of fellow employees and to report any hazard which cannot be controlled personally;
   b. to co-operate with the Company by observing safety rules and complying with any measures designed to ensure a safe and healthy working environment.

4. The Managing Director accepts ultimate responsibility for Health and Safety within the Company. All management supervision and employees are expected to support and implement this policy whole-heartedly.

5. The Policy and procedures will be reviewed annually by the Management Team.

Tom Gowans
Managing Director

June 2012