



EHQMS System Manual

Quality management input comprises the standard requirements from ISO 9001:2015 which are deployed by our organisation to achieve customer satisfaction through process control.

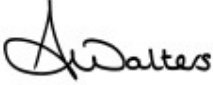
Environmental input comprises the standard requirements from ISO 14001:2015 which provides our organisation with a framework to help protect the environment and respond to changing environmental conditions.

Occupational health and safety management input meets the requirements of ISO 45001:2018 to encourage a safe and healthy workplace and prevent work-related injury and ill-health.

INTEGRATED MANAGEMENT SYSTEM

APPROVAL

The signatures below certify that this management system manual has been authorised and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

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AMENDMENT RECORD

This management system 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:

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	First Issue	0	21.05.23
Various	Change of job titles; Compliance Director & Managing Director	1	05.04.25
50	Updates to Organisational Chart – GDPR	2	15.08.25

COMPANY PROPRIETARY INFORMATION

The electronic version of this document is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version of this manual is uncontrolled, except when provided with a TM System Document reference Number.

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1 Introduction

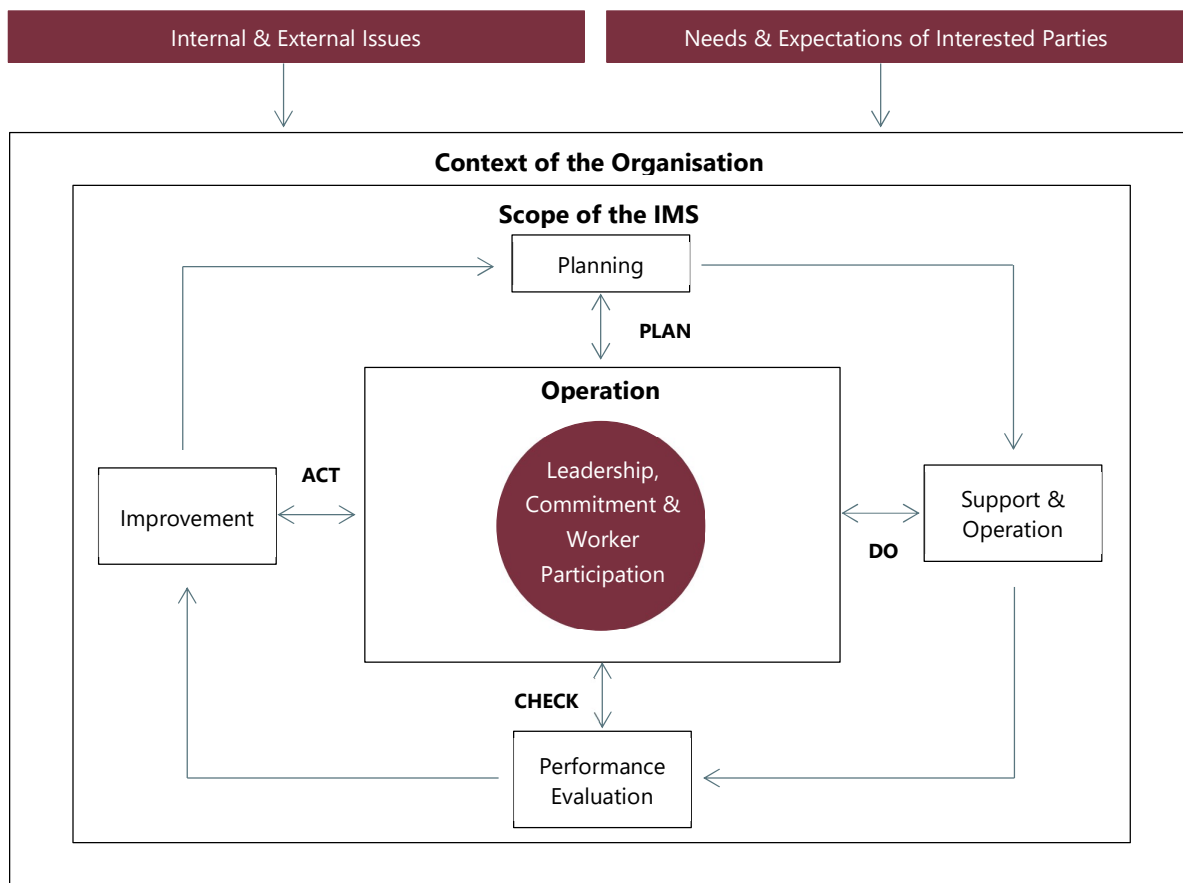
TM Steels Limited has developed and implemented an integrated Quality, Environmental and Occupational Health & Safety Management System, which uses ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 as framework for our organisation to document and improve our operational practices in order to better satisfy the needs and expectations of our workers, customers, stakeholders and interested parties.

This management system manual is used to familiarise our workers, customers, interested parties, or individuals with the controls that have been implemented and to assure them that the integrity of our management system is maintained and is focused on meeting its intended outcomes.

This manual also describes the structure and interactions of our management system, delineates authorities, inter relationships and responsibilities of personnel who operate within the boundaries of TM Steels' integrated management system (IMS), whilst providing reference to the procedures, process and activities that comprise it.

The Figure below illustrates our methodology for the development of our integrated management system, which uses the plan, do, check and act cycle to implement the process approach that delivers management system objectives, stakeholder requirements and customer satisfaction.

Figure 1: Integrated Management System Process Model



Certification to the international standard ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 will help achieve these intended outcomes and demonstrates that the IMS is effective, provides value for TM Steels and its

interested parties. Our management system addresses and supports our wider strategies for the sale of Steel at TM Steels Limited, Sheepbridge Works, Chesterfield, S41 9QD, UK.

Our scope includes the management of billet, bars (forged, rolled, cold drawn and ground); forging, machining, heat treating and associated testing, to customer specified requirements/industry standards, with source/lot traceability of manufacturing batches.

The following table identifies any ISO 9001:2015 requirements, from Section 8.0, that are not applicable to our organisation as well as providing a brief narrative to justify their omission from the scope of our IMS:

Clause	Justification for Exclusion
8.3	TM Steels do not design or develop products. We supply only to customer drawing or specification.

2 References

In addition to ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018, we also make reference to other relevant national or International standards as well as customer specifications appropriate to our context.

Standard	Title	Description
BS EN ISO 9000:2015	Quality management systems	Fundamentals and vocabulary
BS EN ISO 9004:2000	Quality management systems	Guidelines for performance improvements
BS EN ISO 19011:2011	Auditing management systems	Guidelines for auditing
BS EN ISO 14004:2016	Environmental management systems	Guidelines for implementation

3 Definitions

This document does not introduce any new definitions but rather relies on the following:

1. Definitions typically used by our customers, stakeholders or marketplace;
2. Terms typically used in standards and regulations as they relate to our products and services;
3. Standard business terminology;
4. Terms and vocabulary commonly used in quality and manufacturing practices.

4 About Our Organisation

4.1 Organisational Context

TM Steels is committed to defining our position in the marketplace and understanding how relevant factors arising from legal, political, economic, social and technological issues influence our strategic direction and our organisational context.

TM Steels identifies, analyses, monitors and reviews factors that may affect our ability to satisfy our customers and stakeholders, as well as; factors that may adversely affect the stability of our processes and the integrity of the management system.

To ensure that our management system is aligned with our strategy, whilst taking account of relevant internal and external factors; we initially collate and analyze pertinent information in order to determine potential impact on our context and subsequent business strategy.

Such issues include factors that are affected by our organisation or can affect our organisation. Broadly, these issues are defined as:

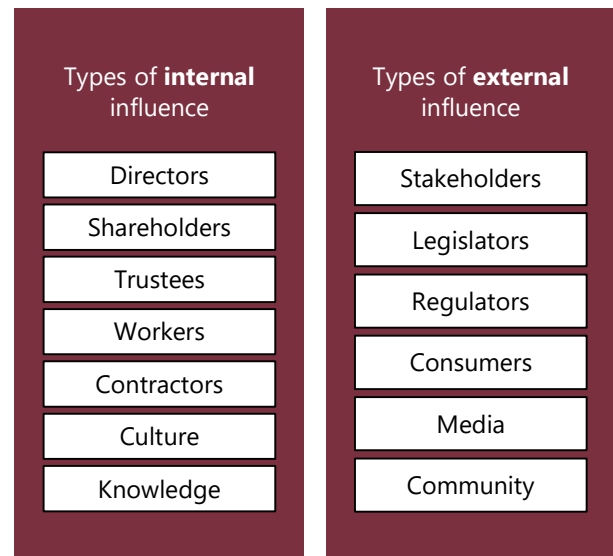
1. **Internal issues** – conditions related to our organisational activities, products, services, strategic direction, culture, people, knowledge, processes and systems;
2. **External issues** – conditions related to cultural, social, political, legal, regulatory, financial, technological, economic, competition at local, national or international levels.

TM Steels then monitors and reviews this information to ensure that a continual understanding of each group's requirements is derived and maintained. To facilitate the understanding of our context, we regularly consider issues that influence our context during management review meetings. The results of which are conveyed via minutes and business planning documents. We maintain and retain; in addition to this document, the following documented information to describe our organisational context and decisions relating to it:

1. Context & Interested Parties analysis underpins our **policies** and drives our **future goals**;
2. Analysis of business plans, strategies, and statutory and regulatory commitments;
3. Analysis of technology and competitors;
4. Economic reports from relevant business sectors;
5. Technical reports from technical experts and consultants;
6. Minutes of meetings (Management and design review minutes), process maps and reports, etc.

The outputs from these activities are evident as an input to determining the scope of our management (4.3) and its processes (4.4), as well as, the consideration of risks and opportunities that may affect the IMS, and the resulting actions that we take to address them (6.1).

Figure 2: Examples of Internal & External Influences



4.2 Relevant Interested Parties

TM Steels identifies and classifies its interested parties, based on current information and knowledge held within our business. Each interested party is allocated to one or more categories and is analyzed to determine whether any relevant needs or expectations exist, which could impact our business activities or the IMS, and which must be adopted by the organisation.

Using Context & Interested Parties analysis, interested parties and their requirements are ranked and scored using simple, subjective criteria to consider risk potential. This is calculated by multiplying the perceived power score, by the priority score, by the relevance score.

Prioritised relevant needs or expectations are converted into requirements which become inputs to IMS planning. The outputs from this process are typically used to inform the following sections and processes of the IMS:

1. Management system scope - 4.3;
2. Management system processes - 4.4;
3. Risk and opportunities - 6.1.1;
4. Environmental aspect and impacts - 6.1.2;
5. OH&S hazard identification and assessment - 6.1.3;
6. Compliance obligations and legal requirements - 6.1.4;
7. Communication - 7.4;
8. Operations - 8.0.

TM Steels recognises that we have a unique set of interested parties whose needs and expectations change and develop over time, and furthermore; that only a limited set of their respective needs and expectations are applicable to our operational purpose.

4.3 Management System Scope

Based on the scope of our activities described in Section 1 - Introduction and the analysis of the issues and requirements identified in Sections 4.1 and 4.2, TM Steels has established the scope of our environmental management system in order to implement the objectives and policies that are relevant to our context, physical and organisational boundaries, product life cycles and any interested parties.

TM Steels can exert authority and differing levels of control and influence over our activities, as they relate to our products and services, as performed at our facilities. The functional and organisational boundaries for the different physical locations (where applicable) and the level of control and influence are summarised below:

Physical Boundary	Functional Boundary	Organisational Boundary	Authority to Control or Influence
Our facilities at the following address: TM Steels Limited, Sheepbridge Works, Chesterfield S41 9QD UK.	All activities performed and managed by our organisation which result in product or service outputs	Complete organisational control over current activities	We have a high degree of authority in order to control or influence related processes

Figure 3: Types of Interested Party



Physical Boundary	Functional Boundary	Organisational Boundary	Authority to Control or Influence
External process performed by 3 rd parties	Undertaking process as per our specifications	Purchasing and contractual controls	3 rd Parties are controlled and influenced through contractual mechanisms

In order for our management system to be robust, all the activities, products and services undertaken by TM Steels are included with in the scope of the IMS. In this way, we are able to control and influence our activities, products and services.

The scope of this document describes our IMS, delineates authorities, inter-relationships and responsibilities of process owners and personnel that operate within management system and the sequence and interaction of our processes. Conformance to ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 has been verified utilising a formal assessment and review process undertaken.

Although we recognize that ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 does not require a formal manual, we have decided to retain and update our integrated manual, as our employees, customers, suppliers and other stakeholders perceive it to add value to our operations.

4.4 Management System Processes

TM Steels has implemented an IMS that exists as part of a larger strategy that has established, documented and implemented our processes, integrated policies and objectives, whilst satisfying the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.

To achieve this, TM Steels has adopted the process approach advocated by the above management system standards. Top management has determined the processes required for achieving the intended outputs. Refer to the *Process Matrix & Application* template that is used to record and assign requirements to relevant functions, processes, departments and teams. This information forms the basis for programming process audits.

By defining three key process-groups, and by managing their inputs, activities, controls, outputs and interfaces, our organisation ensures that system effectiveness is established and maintained. These process groups are described using tools such as procedures, process maps, turtle diagrams, matrices, schedules and charts, etc.

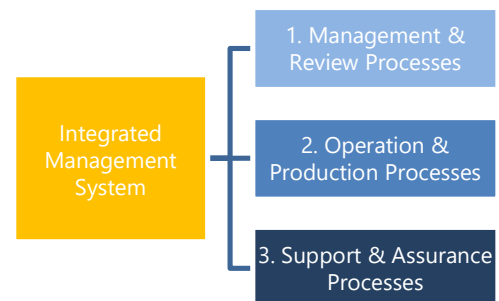
Refer to **Appendix A.2** for the sequence of our processes and the interaction of the processes within our IMS. It is recognized that defining, implementing and documenting our integrated management system is only the first step towards fully implementing its requirements.

The monitoring of key performance indicators (KPIs), which are linked to our objectives, is used to measure and communicate process performance. This approach allows Top management to regularly review management system performance and to ensure its ongoing integration with business processes.

As part of the decision-making process; we use trends and statistical data and trends related to non-conformities, environmental, quality and OH&S related aspects, targets, objectives and corrective actions, as well as, monitoring and measurement results, audit results, levels of customer satisfaction, process performance data and compliance data, to ensure that objective management decisions can be made.

Where TM Steels identifies the requirement to outsource any process, or part thereof, which affects conformity with the stated requirements; TM Steels identifies control criteria such as; the competence of workers and

Figure 4 : Key Process Groups



contractors, inspection regimes, the provision of product conformity certificates, adherence to specifications and specific job files, etc.

Supporting documentation:

Ref.	Title & Description
01	Organisational Context Procedure ~ TMS-IMS-03

5 Leadership, Commitment and Worker Participation

5.1 Leadership & Commitment

5.1.1 General

Top management is actively involved in maintaining the quality, environmental and OH&S management system. It provides the vision and strategic direction for growth of our integrated management system, and establishes the necessary objectives and policies taking into account the context and strategic direction of our organisation.

To continue to provide leadership and show commitment to the improvement of our quality, environmental and OH&S management system, Top management communicates the importance of fulfilling customer, legal and regulatory compliance requirements through periodic communication meetings as well as by conducting management reviews to ensure the availability of resources, that risk assessments are understood and the integrated management system achieves its intended results.

Top management provides accountability and governance to all activities related to the lifecycle of our processes and products. This includes defining the appropriate responsibilities, authorities, and methods of communication to ensure the safe and effective performance. Top management ensures that all necessary resources, responsibilities and accountabilities are allocated for the continual improvement of the management system. Refer to **Appendix A.2** for a copy of our Organisation Chart.

Top management have appointed the Compliance Director to ensure that the necessary financial, technological and organisational resources, including the services of specialists and competent Health & Safety Advisors, Environmental Coordinators and Quality Inspectors are available to implement monitor, maintain and report upon the status of the management system.

Cross-functional committees that comprise various organisational levels, functions and work areas are established to support the active management of our integrated system. The Cross-functional committees oversee the implementation of improvement plans. The Cross-functional committees report to Top management and the Compliance Director.

Regular reviews and data reporting ensure that our management system is effective and has the ability to react to emerging issues. Top management is committed to implementing and developing the management system and this commitment is defined by our corporate policies and objectives. Top management's involvement and commitment may be found in:

1. Business strategy plans and meetings;
2. Management system goals, their communication and their incentivisation.
3. Information provided on our website or social media channels;
4. Annual reports;
5. Management meeting minutes.

Top management ensures that our corporate policies are understood, implemented and maintained throughout at all levels of the organisation through printed distribution of policy statements and through periodic management reviews of the policy statements, functional objectives, and corporate level improvement objectives. TM Steels communicates our mission, vision, strategy, policies and processes to all workers in order to:

1. Create and sustain shared values of fairness and ethical behaviour.
2. Establish a culture of trust and integrity.
3. Encourage commitment to quality.
4. Provide people with the required resources, training and authority to act with accountability.
5. Inspire, encourage and recognize people's contribution.

In addition, our corporate policies, objectives and targets are communicated and deployed throughout the business via individual, team and department performance objectives which are established and discussed during employee performance reviews.

5.1.2 Customer Focus

TM Steels 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 objectives related to levels of customer satisfaction at management review meetings.

Top management also ensures that customer requirements are understood and met. Customer requirements are understood, converted into internal requirements, and communicated to appropriate workers and contractors within the organisation, refer to Section 8.2.2.

Customer complaints and other forms of customer feedback are continually monitored and measured to identify opportunities for improvement. We continually look for ways to interact directly with our customers to ensure that we focus on their unique needs and expectations

5.2 Management System Policies

5.2.1 Establishing our Policies

The integrated management system policy acts as a compass by providing the direction and framework for establishing key corporate level performance measures, as well as related objectives and targets. Top management ensures that our corporate policies are established and documented, and that the policies are available to all interested parties via our website.

The Compliance Director has overall responsibility for defining, documenting, implementing and reviewing our integrated policies in consultation with the management teams and other workers and contractors, or their representatives. The policies are reviewed at least annually, as part of the management review programme or at a frequency determined by:

1. Changes in organisational context (Refer to Section 4.1);
2. Changing needs and expectations of relevant interested parties (Refer to Section 4.2);
3. Risks and opportunities to the IMS (Refer to Section 6.1.1)
4. Environmental aspects presented during planning and operational processes (Refer to Section 6.1.2);
5. OH&S hazards presented during planning and operational processes (Refer to Section 6.1.3 & 8.1);
6. Compliance obligations that are presented through the planning process (Refer to Section 6.1.4).

TM Steels' integrated policies are communicated to all employees at all levels throughout our organisation via training, regular internal communications and reinforcement during annual employee performance reviews. Employee understanding of our policies and objectives is determined during internal audits and other methods deemed appropriate.

TM Steels is committed to an operating philosophy based on openness in communication, integrity in serving our customers, fairness and concern for our employees and responsibility to the communities within which we operate.

Our vision is to exceed customer expectations for environmental, safety, sustainability, cost, delivery and value. Although the activities contained with our policies are centrally coordinated from our facilities, success of the policy relies on the participation of everyone, and as such, the policy's aims are embedded into our processes.

5.2.2 Communicating our Policies

Top management ensures that our corporate policies are established and documented, and that the policies are available to all interested parties via our website. Our policies are communicated to all employees at all levels

throughout our organisation via training, regular internal communications and reinforcement during annual employee performance reviews. Understanding of our policies and objectives is determined during internal audits and other methods deemed appropriate.

5.3 Roles, Responsibilities and Authorities

Job descriptions and the organisational structure are reviewed and approved by Top management for adequacy as determined by the changing needs and expectations of the interested parties identified in Section 4.2, and any risk and opportunities presented through the risk management process, Section 6.1. All roles with IMS accountability and responsibilities (including compliance and legislative requirements) are:

1. Documented in job descriptions
2. Documented in responsibility matrices;
3. Included in an organisation chart specific to the business;
4. Organisational charts are available to all employees;
5. Where contractors are involved, areas of accountability and responsibility are contractually agreed.

The organisation chart defined in **Appendix A.2** shows the interrelation of personnel within TM Steels, whilst job descriptions define the responsibilities and authorities of each role. Some of which are summarized below:

5.3.1 Top Management

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

Members of Top management are ultimately responsible for the quality of TM Steels' products and services since they control the resources, systems and processes by which conforming work is accomplished.

Top management accepts their legal and moral obligations to ensure, as far as reasonably practicable, a safe and healthy working environment. Safe systems of work are implemented to protect workers, contractors, and anyone else who may be affected by our operations, from physical harm. In pursuance of this duty, Top management has appointed safety specialists to discharge occupational health and safety duties within our operations.

5.3.2 Compliance Director

The Compliance Director is responsible for ensuring that any identified risks to quality, the environment or occupational health and safety hazards are eliminated or reduced at source to As-Low-As-Reasonably-Practicable (ALARP) and that our organisation's strategic development does not compromise the intended outcomes of our integrated management system by;

1. Reporting on the operation of the management system;
2. Ensuring that improvement is taking place;
3. Ensuring that customer focus is promoted throughout the organisation.
4. Ensuring that whenever changes to the IMS are planned and implemented;
5. Ensuring the integrity of the system is maintained during changes;
6. Ensuring that responsibilities and authorities within the IMS are communicated and delegated.

5.3.3 Quality Inspectors

Quality Inspectors support the Compliance Director to deliver the following:

1. Inspecting products for flaws or defects;
2. Testing items by analysing size, weight, dimensions, etc.;
3. Ensuring the production process meets requirements;

4. Creating reports of quality control tests;
5. Performing statistical analysis and data analysis.
6. Assisting with internal audits;
7. Fulfilling documentation and reporting requirements.

5.3.4 QHSE Committee – Environmental

QHSE Committee supports the Compliance Director to deliver the following:

1. Providing advice and information on environmental matters to staff and others as applicable;
2. Coordinating environmental issues with employees;
3. Identifying and assessing environmental aspects and their impacts;
4. Ensuring operational controls are implemented and monitored;
5. Representation at Improvement Groups;
6. Publication of internal communications and environmental newsletters;
7. Completion of audits according to the internal audit programme;
8. Increasing the environmental competence and awareness of staff at all levels through the development of training and awareness initiatives and sharing of best practice.

5.3.5 QHSE Committee – Health & Safety

QHSE Committee supports the Compliance Director to deliver the following:

1. Providing advice and information on health and safety matters to staff and others as applicable;
2. Identifying and assessing OH&S hazards and their risks;
3. Ensuring operational controls are implemented and monitored;
4. Coordinating OH&S issues with employees;
5. Representation at Improvement Groups;
6. Publication of internal communications and OH&S newsletters;
7. Completion of audits according to the internal audit programme;
8. Increasing the OH&S competence and awareness of staff at all levels through the development of training and awareness initiatives and sharing of best practice.

5.3.6 Managers & Supervisors

All Managers and Supervisors demonstrate their commitment to the development and improvement of the 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 system processes.

All Managers and Supervisors are responsible for the execution of the business plan and the implementation of our policies, processes and systems described in this integrated manual. All Managers and Supervisors are responsible for planning and controlling the 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.

5.3.7 Workers & Contractors

All workers and contractors are responsible for the quality of their work and implementation of our policies and procedures applicable to the processes that they perform. Workers and contractors who are responsible for product quality have the authority to stop production to correct quality problems.

Workers and contractors are motivated and empowered to identify and report any known or potential problems, and to recommend solutions to aid subsequent risk management and corrective action activities.

All workers and contractors are encouraged to participate and engage with occupational health and safety management processes. At our facilities, TM Steels appoints Health and Safety Representatives and Advisors, First Aiders and Fire Marshals as required by local conditions, and as determined by documented risk assessments. Employees who share a workspace are required to cooperate and coordinate their actions to ensure safe undertakings.

5.4 Consultation & Participation of Workers and Contractors

TM Steels recognises that the involvement of workers in the integrated (OH&S) management system and the processes that support it are a key requirement of effective OH&S management that enables our organisation to make informed decisions.

Worker participation and consultation is ensured via the engagement of all employees, at all applicable levels and functions within our organisation. Workers include contractor and agency staff who perform work on-site, as well as our organisation's direct employees. Time, training, information and resources for participation are provided whilst obstacles and barriers to participation are removed entirely or minimized when they cannot be removed.

Health & Safety Representatives and Health & Safety Advisors are involved in the following activities, in conjunction with the relevant workers:

1. Incident investigation;
2. Hazard identification;
3. Risk assessment;
4. Implementing and monitoring appropriate hazard mitigations.

Changes to the management system are controlled via the management of change process to ensure unintended consequences are recognized, mitigated, or eliminated prior to implementation of the proposed change. Employees are represented by the Health & Safety Representatives and Health & Safety Advisors in OH&S matters, and these representatives determine when and how information is communicated.

Top management ensures participation and representation of the workforce in regard to occupational health and safety matters by promoting the participation of non-managerial roles within the OH&S system requirements, including incident investigations, work-place assessments, agreeing corrective actions, formulating objectives and policies, and undertaking monitoring activities such as inspections and internal audits. Other mechanisms for consultation and participation include focussed team meetings, workshops, worker surveys and suggestion schemes.

6 Planning

6.1 General

TM Steels considers and manages the risks and opportunities relating to our stakeholders, and our external and internal context. This process uses the information collected during context and strategy evaluations stakeholder and interested party analysis, and from the evaluation of any hazards and impacts.

Top management considers the risks and opportunities and takes action to ensure that our management system meets its intended outcomes and achieves continual improvement. All proceedings and decisions are recorded in the management review meeting minutes.

Once the significant or material risks and opportunities are identified; from the activities and outputs undertaken in Sections 6.1.1 to 6.1.5, our organisation plans actions to avoid or mitigate perceived risks, or to take advantage of opportunities.

Action is taken in a variety of ways using management review meetings, design review meetings, setting objectives, KPIs and policies, operational control, emergency preparedness, supplier evaluation, and other appropriate processes.

6.1.1 Risks & Opportunities

The aim of risk and opportunity management within TM Steels is to ensure that organisational capabilities and resources are employed in an efficient and effective manner to take advantage of opportunities and to mitigate risk to our strategic direction and business planning (4.1), interested parties (4.2), our management system and its processes (4.3), our products (8.1) and our suppliers (8.4).

Top management are responsible for incorporating risk-based thinking into our organisation's culture. This includes the establishment of risk management procedures and processes to ensure the effective risk and opportunity management principles are undertaken throughout the lifecycle of our management system, products, services and activities by:

1. Providing sufficient resources to carry out risk and opportunity management activities;
2. Assigning responsibilities and authorities for risk and opportunity management activities;
3. Reviewing information and results from audits and risk and opportunity management activities.

Risk and opportunity management is undertaken as part of TM Steels' day-to-day operations to capture and react to perceived risk and opportunity, ensuring each issue is managed at the most appropriate level within our organisation.

TM Steels has classified its 'risk appetite' as the amount of risk that we are willing to accept in pursuit of an opportunity or the avoidance or mitigation of risk; where each pertains to the conformity of our products, processes, the management system, and which reflect the following considerations:

1. Risk management philosophy per product or process, and tolerance for failures;
2. Capacity to take on and mitigate risk, or ability to avoid risk;
3. Our policies, objectives, business plans and respective stakeholder demands;
4. Evolving industry, market, and other macro or micro environmental conditions.

TM Steels uses a *Risk & Opportunity Register* to help record, assess, respond, review, report, monitor and plan for the risks and opportunities that we perceive to be relevant. The register allows our organisation to methodically assess each risk and to study each opportunity associated with our organisational context, strategy, legal requirements and compliance obligations that relate to the needs and expectations of our customers and interested parties. The register records the control method for each risk and how each opportunity is exploited. In order to preserve this knowledge, risk registers are retained as documented information.

Supporting documentation:

Ref.	Title & Description
02	Risks & Opportunities Procedure – TMS-IMS-04

6.1.2 Environmental Aspects

TM Steels identifies relevant environmental aspects and their subsequent impacts that pertain to our business operations, obligations and customer requirements. Environmental aspects and impacts are recorded within the Aspect Identification & Assessment.

For each identified aspect, the operating conditions, environmental impacts and perceived significance are summarised without the need to provide an exhaustive list of all activities where there are several generic and specialist impacts.

Within the register, an assessment of the potential environmental impact of each aspect is undertaken and recorded, along with related targets and objectives. A scoring system is used to identify the significance of each environmental aspect with regards to relevant current and past activities, products, services and planned or new system or process developments.

The scoring process allows consideration of normal, abnormal and emergency operating conditions where applicable. The risks and opportunities encountered during the life cycle of our environmental aspects are considered when determining the significance of each impact. Within the register, the environmental aspects are sorted into six categories to facilitate their management and mitigation:

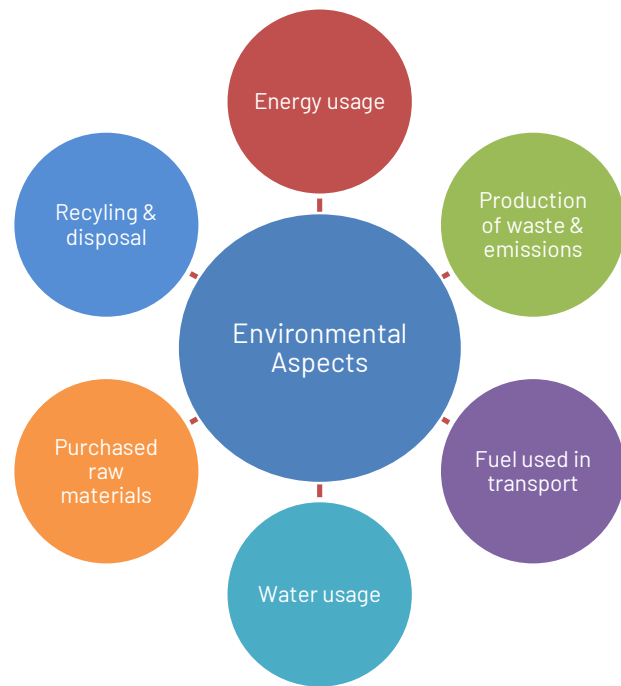
1. Use of natural resources;
2. Land development and buildings;
3. Pollution prevention;
4. Sustainable procurement;
5. Waste management;
6. Travel and transport.

This process is communicated using the Aspect Identification & Assessment Procedure. The subsequent output from this process takes account of the severity of pertinent environmental aspects and our organisation's ability to influence them, in order to determine key issues and requirements that pose adverse or beneficial effects in a prioritised way to:

1. Assure that the management system can achieve its intended outcomes;
2. Prevent or reduce undesired effects;
3. Achieve continual improvement.

Environmental aspects that we address include:

Figure 5: Types of Environmental Aspect



1. Those with significant environmental aspects;
2. Those that affect compliance with our obligations;
3. Those which are priority issues for the organisation (e.g. affect policies or objectives).

Environmental aspects which pose a significant impact are subject to risk management, corrective action, and monitoring and measurement as appropriate. The EHQMS is structured to identify and manage these aspects in order to control or limit potential impacts and risks that may affect our organisation and system conformity.

The significance of our organisation's aspects is reviewed annually, including proposals for new processes, services or developments and environmental aspects arising are also considered and assessed for significance by the Compliance Director. New aspects are added to the Aspect Identification & Assessment as necessary and operational control is altered accordingly.

Supporting documentation:

Ref.	Title & Description
03	Aspect Identification & Assessment Procedure – TMS-IMS-24

6.1.3 Hazard Identification & Assessment

TM Steels has established and implemented a system to identify and assess occupational health and safety hazards and to determine appropriate operational controls, Refer to 8.1.3. This activity is managed using the Hazard Identification & Assessment Procedure. OHS hazards and risks are recorded within the Hazard Identification Register.

The subsequent output from this activity takes account of the severity of pertinent occupational health and safety hazards, the risk that they pose, as well as our ability to influence them. The health and safety hazards which give rise to risk are subject to mitigation, corrective action, and monitoring, as appropriate. The following types of activities and hazards are risk assessed prior starting work:

1. Routine and non-routine activities;
2. Hazards originating externally to the workplace;
3. Work operations including contractor activities;
4. Use of infrastructure, equipment and materials;
5. Whenever change occurs to systems, processes equipment, workers and contractors, materials etc.;
6. Changes in legislation;
7. Emergency situations and potential incidents e.g. fire, accidents;
8. Contractors and visitors to the workplace;
9. The capabilities of workers and contractors including human behavior.

Our organisation uses the Health & Safety Risk Assessment form for undertaking risk assessments of activities that apply to our operations, customer requirements, and routine and non-routine activities. The risk controls documented within the risk assessments are categorized into mandatory and additional controls. Risk assessments are completed by the Compliance Director. Continuous systematic and formal monitoring of implementation of the health and safety assessment process and outputs take place against appropriate performance indicators to ensure process compliance and effectiveness.

Supporting documentation:

Ref.	Title & Description
04	Hazard Identification & Assessment Procedure – TMS-IMS-25

6.1.4 Compliance & Legal Requirements

Top management and the Compliance Director review all relevant environmental legislation directly related to our identified environmental aspects and impacts using the NET-Regs service www.netregs.gov.uk which is service provided by the UK Environment Agency. Applicable environmental aspects are identified, evaluated and understood in terms of current legislation and their impact on customer requirements, include as appropriate:

1. The Climate Change Act 2008;
2. The Energy Performance of Buildings (England and Wales) Regulations 2012;
3. The Renewable Heat Incentive Scheme Regulations 2011;
4. Water Resources Act 1991;
5. Building Regulations 2000;
6. CRC Energy Efficiency Commitment Scheme;
7. Climate Change Levy Regulations.

All relevant legislation and other requirements applicable to TM Steels' environmental aspects and impacts are compiled into the Legal & Compliance Register. The Compliance Director ensures that applicable environmental aspects are identified and understood in terms of customer requirements and current legislation.

Similarly, the Compliance Director reviews all relevant occupational health and safety related legal requirements, regulations and Approved Codes of Practice (ACoPs) using the Health and Safety Executive's website www.hse.gov.uk/guidance/index.htm and ensures that all applicable occupational health and safety hazards are identified, evaluated and understood in terms of current legislation, including as appropriate:

1. The Regulatory Reform (Fire Safety) Order 2005;
2. Reporting Hazards and Dangerous Conditions or Incidents (Near Misses);
3. Health and Safety (First Aid) Regulations 1981;
4. COSHH Regulations 2002;
5. Health and Safety at Work Act 1974;
6. The Safety Representatives and Safety Committees Regulations 1977;
7. The Health and Safety (Consultation with Employees) Regulations 1996.

It is the responsibility of the Compliance Director to maintain, review and update the Legal & Compliance Register, in order to:

1. Determine whether legislation, amended, current or new legislation is 'relevant' or 'irrelevant';
2. Determine whether our organisation is compliant with the legislation;
3. Describe how the requirements apply and what controls are in place;
4. Determine other relevant compliance obligations and those that we should adopt;
5. Describe how the requirements apply to and what controls are in place to remain compliant;
6. Update and communicate the compliance obligations register to relevant staff;
7. Maintain records or periodic compliance reviews.

Legal and compliance obligations are reviewed on a regular basis with assistance from the automatic emails received from NET-Regs whenever legislation is updated or is newly published. The process by which we manage our compliance obligations and legal requirements is communicated using the Legal & Compliance Requirements Procedure.

Supporting documentation:

Ref.	Title & Description
05	Legal & Compliance Requirements Procedure ~ TMS-IMS-13

6.1.5 Planning Action

Our management system is planned and implemented in order to meet our corporate objectives and as such the planning process involves establishing and communicating our corporate policies, objectives and associated operational procedures.

This document constitutes our overall plan for establishing, maintaining and improving our QEHS management system. For each instance of management system planning, the output is documented and retained accordingly. Any changes are conducted in a controlled manner.

All identified significant environmental aspects and OHS hazards, and associated risks and opportunities that need to be addressed, are used to prioritise action our action planning in order to manage and mitigate them. The Compliance Director analyses the risks associated with each change and presents the assessment to Top management for consideration.

The management review process, change control process, and the internal audit process ensure that the integrity of our management system is maintained when significant changes affect key processes. The management review makes recommendations to ensure that risks and opportunities that could affect the intended outcomes of the management system are taken into account and planned for via the most appropriate business processes.

6.2 Management System Objectives

6.2.1 Integrated Objectives

TM Steels sets out its objectives and targets on a regular basis within the management review minutes where details of programme dates and responsibilities are defined. Improvements in quality, occupational health and safety, and environmental performance are incremental and are in keeping with the size and complexity of our organisation. The process for determining our objectives is communicated by the *Objectives, Targets & KPIs Procedure*. Each measurable objective:

1. Is consistent with our established strategies, policies and context;
2. Contributes to the prevention of accidents and incidents and to reduce their impact(s);
3. Contributes to the prevention of pollution;
4. Provides a basis for continual improvement;
5. Enhances customer satisfaction.

Objectives are set in association with the Compliance Director which are based on reported compliance levels, audited deficiencies and legislative requirements, and agreed by the Top management. The Compliance Director monitors and reports progress at monthly management meetings. To enable objectives and targets to be met, annual improvement plans are developed, documented and integrated into our overall business planning process and which:

1. Specifies the required resources (both human and financial) needed to meet the objectives;
2. Specifies the roles and responsibilities for implementing improvement plans and actions;
3. Establishes the timeframes for completion of improvement plans and achievement of objectives.

When setting objectives and targets, Top management ensures that they are consistent with the needs and expectations of our interested parties, as defined in Section 4.2, and with our corporate targets and policies. In addition, technological options, financial, operational and business requirements are considered.

Progress is reviewed routinely by Top management as part of the management review and reporting activities, and incorporates any proposed developments for modified activities, products or services. Management

programmes are modified to account for any changes that affect the achievement of our objectives and targets. All proceedings and decisions are recorded in the management review meeting minutes.

In order to determine whether or not our objectives and targets are being met, their related metrics are reported visually as a set of key performance indicators (KPIs). This allows progress over time to be monitored as the metrics are gathered and the data is analyzed. KPIs and objectives for our organisation include the following:

1. Turnover and profitability;
2. Sales targets and production efficiency targets;
3. Reject and rework and cost of quality targets;
4. Energy and raw material use targets;
5. Accident and incident frequency rate;
6. Staffing breakdown.

On the basis of our policies, TM Steels sets objectives that are specified in the Register of OEHS Objectives & KPIs. All employees are aware of and, responsible, for the fulfillment of our policies and their subsequent objectives. Managers of all departments are obliged to develop high level objectives into objectives applicable to their departments and employees.

Objective	Target	Measure
Implement ISO 9001:2015	Maintain certification	ISO 9001:2015 certificate
Implement ISO 14001:2015	Achieve certification by Q4 2025	ISO 14001:2015 certificate
Implement ISO 45001:2018	Achieve certification by Q4 2025	ISO 45001:2018 certificate
Implement training programme	All employees trained by Q4 2025	Feedback, improved performance
Reduce wastage, increase recycling	Increase recycling by 20% by Q4 2025	Reduced waste to landfill

6.2.2 Objectives & Planning to Achieve Them

Top Management are responsible for developing the Objectives Management Programme and targets for the whole organisation. The Compliance Director is responsible for monitoring progress against our targets and objectives, and for reporting this data to Top management. The identified significant environmental aspects, occupational health and safety hazards, and quality risks and opportunities are used to prioritise which objectives and plans to implement.

Top management is responsible for agreeing objectives and targets relating to activities under their control and for approving and endorsing objectives and targets for the organisation. Planning for action to mitigate adverse risk and significant impacts and the leveraging of opportunities is implemented via:

1. Management system objectives;
2. Monitoring, measuring and analysis;
3. Operational controls;
4. Emergency preparedness and incident response;
5. Others, as appropriate.

The programme acts as our management action plan that identifies individual objectives, the means by which the objectives are to be achieved, and the timeframe in which the actions are to be achieved. Actions are assigned to suitably authorized and competent employees, who are responsible for ensuring that the actions are completed within the terms specified by the programme.

Our plans are driven by the identified significant environmental impacts, occupational health and safety hazards, and the associated impacts, risks and opportunities. Regular and documented management reviews make recommendations to ensure that those risks and opportunities and significant impacts that could affect the

intended outcomes of the management system are taken into account and planned for via the most appropriate business processes.

Reviews of progress towards the achievement of our objectives and targets, along with the status of the implementation of improvement plans is conducted at regular and planned intervals or whenever there is a change to activities, operating conditions, or product quality.

Supporting documentation:

Ref.	Title & Description
06	Objectives, Targets & Indicators procedure ~ TMS-IMS-18

6.3 Planning for Change

Management system reviews and planning activities are performed, prior to the implementation of any significant changes that might impact upon the effectiveness of our integrated management system, in order to minimise adverse effects, as necessary. These types of change may be:

1. Planned or unplanned;
2. Sudden or gradual;
3. Temporary or permanent.

The Compliance Director in conjunction with relevant process owners identify relevant risks and opportunities in order to assess the potential impact of each change to current process practices and activities that might impact upon the performance of the management system. Change assessments are presented to Top management for consideration and approval.

The required changes are discussed and documented in the *Management Review Minutes* and subsequent audit and inspection reports assure integrity of the management system and the availability of resources. The allocation or reallocation of responsibilities and authorities is also discussed and documented during the management review meeting.

Operational activities are also a source of change. The change process also applies to the following activities and information which may foreseeably undergo change that require re-assessment after each change:

Type of change	Related Section
Workplace locations and surroundings	4.1, 7.1.4
Working conditions	4.1, 7.1.4
Workforce, plant and equipment	4.1, 7.1.3, 7.1.4
Materials used, their composition and properties	8.2.3, 8.3, 8.4
Operating and maintenance procedures	7.1.3, 7.5, 8.1
Emergency procedures or changes to business resilience	4.1, 8.1, 8.8
Electronic system software	7.1.5
Organisational structures and responsibilities	4.1, 4.4, 5.3, 5.4, 7.1.2
Personnel changes, training or competency requirements	5.3, 5.4, 7.1.2, 7.2, 7.3
Individual roles and responsibilities	5.3, 5.4
Regulatory and statutory requirements	4.1, 6.1.4, 9.1
Changes in knowledge or information relating to OH&S risks	5.4, 6.1.3, 6.1.4, 7.1.6
New technology and processes	4.4, 6.1
Activities, products and services	4.1, 4.2, 4.3, 4.4, 8.1

The planning activities associated with these types of change are documented using OH&S hazard assessments, workplace assessments, environmental aspect registers, compliance and legal requirements registers, and other planning documents as appropriate.

7 Support

7.1 Resources

7.1.1 General

The resource requirements for the implementation, management, control and continual improvement of our IMS, and the activities necessary to enhance customer satisfaction, are defined in our operational procedures, work instructions and the following sections of this integrated management system manual:

1. Planning; Section 6.0
2. Management review; Section 9.3
3. Human resources; Section 7.1.2
4. Infrastructure; Section 7.1.3
5. Work environment; Section 7.1.4
6. Planning operational control; Section 8.1
7. Determination of customer requirements; Section 8.2

7.1.2 People

To ensure competence of our workers and contractors, the Compliance Director uses job specifications and descriptions which identify the qualifications, experience and responsibilities that are required for each position that affects product and management system conformity.

The Compliance Director reviews employee qualifications prior to hire when an employee changes positions or the requirements for a position change. Qualifications include desired requirements for education, skills and experience. Appropriate qualifications, along with the provision of any required training, provide the competence required for each position.

The Compliance Director 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 of training are evaluated for effectiveness.

7.1.3 Infrastructure & Natural Resources

Top management is responsible for planning, providing and maintaining the infrastructure and resources needed to achieve product and process conformance, including buildings, workspace and associated utilities; process equipment (hardware and software); and supporting services (such as internal transportation, material handling systems, and communications systems).

The Compliance Director, supported by the Management team, has overall responsibility for managing the related environmental impacts and occupational health and safety hazards present at our facilities or which exist intrinsically within our equipment and process, or maintenance programmes, including:

1. Transportation and material handling;
2. Equipment management, maintenance and repair;
3. Process and production equipment management, maintenance and repair;
4. Facilities management, maintenance and repair.

The Compliance Director in conjunction with the Management Team have overall responsibility for managing and mitigating our organisation's use of natural resources (non-renewable electricity, natural gas, and water) which is identified and managed as a significant environmental aspect, and to ensure that our operations remain compliant with relevant parts of:

1. Our corporate policies and objectives;
2. Business and strategy planning;

3. Local Authority conditions;
4. Compliance obligations and legal requirements:

The operation and maintenance of plant and equipment that have the potential to impact management system performance, as defined through risk analysis, is maintained, inspected and tested to ensure it meets design descriptions and specifications. Documentation for critical processes, plant, and equipment is retained and made available, and includes as applicable:

1. Codes and relevant legislation;
2. Hazard assessment reports;
3. Operating procedures and operating criteria;
4. Engineering drawings, specifications and engineering standards;
5. Maintenance, inspection and testing strategies;
6. The characteristics of the product or materials essential for safe and proper use.

Supporting documentation:

Ref.	Title & Description
07	Infrastructure & Natural Resources ~ TMS-IMS-22

7.1.4 Operational Environment

TM Steels ensures that our offices and warehouses comply with relevant health and safety regulations. The Compliance Director carries out regular compliance audits to ensure that appropriate standards are maintained. Top management is committed to providing:

1. A place of work that is safe, including all equipment and methods of work;
2. Training, instruction, information and supervision for employees;
3. A means of safe handling, storage, use and transportation of equipment, materials and chemicals;
4. Safe working environment with good lighting, ventilation, safe passageways, stairs and corridors.

Where the work environment or the impact of workers and contractors on operational process is determined to result in a risk to products or processes, then risk control measures are defined, documented and implemented. The effectiveness of risk control measures is periodically assessed.

7.1.5 Monitoring & Measurement Tools

The Compliance Director determines the frequency of monitoring and measuring activities as well as the types of tools and devices we use to provide evidence of valid measurements to verify specified tolerances and measurement ranges. The frequency of maintenance and calibration is considered with reference to the risks associated with the failure of the device upon the process and its output. The methodology for controlling monitoring and measuring tools is communicated by the Calibrated Equipment Procedure. Where necessary, to ensure the validity of results, calibrated equipment is:

1. Calibrated or verified at specified intervals, or prior to use;
2. Calibrated against measurement standards traceable to appropriate measurement standards;
3. Software used for monitoring and measurement is validated using defined parameters prior to use;
4. Protected from damage and deterioration during handling, maintenance and storage;
5. Safeguarded from adjustments that would invalidate the measurement result;
6. Identified to enable the unit's calibration status to be determined;
7. Safeguarded from use when a unit is found to be out of calibration and the results revalidated;
8. Adjusted or re-adjusted as necessary.

In addition, the Compliance Director re-assesses and records the validity of previous measurement results when a tool or device is subsequently found not to conform to requirements. The Compliance Director takes appropriate action on any equipment, product or process that may be affected.

Where equipment is found to be out of calibration, the significance of the error is reviewed, its extent is traced and the results are re-verified. Records of the results of calibration and validation are maintained using the *Controlled Equipment Log*, the *Calibration Log*, and the *Software Validation Log* as documented information.

Supporting documentation:

Ref.	Title & Description
08	Calibrated Equipment Procedure – TMS-IMS-05

7.1.6 Organisational Knowledge

TM Steels recognises that organisational knowledge is a valuable resource that supports our processes and activities and which helps to assure the conformity of our products, processes, and services. There is a strong link between organisational knowledge and the competence of our people, the latter being our employees' ability to apply knowledge to their work. We define organisational knowledge as information combined with experience, context, interpretation, and insights that are useful when making decisions and taking action specific to our management system.

To ensure that organisational knowledge relating to quality, environmental and OH&S aspects are captured and disseminated through formal modes of training and communication. Organisational knowledge is captured in documented information and is embedded into our processes, products and services. Examples of organisational knowledge include:

1. Documented information regarding a process, product or service;
2. Previous specifications and work instructions;
3. The experience of skilled people operating their processes;
4. Mentoring and coaching by more experienced employees;
5. Knowledge or information relating to OH&S risks;
6. knowledge or information relating to environmental aspects;
7. Knowledge of new technologies and infrastructure relevant to our organisation, etc.

Sources of internal knowledge also include our intellectual property; knowledge gained from experience and coaching; lessons learnt from failures and successes; capturing and sharing undocumented knowledge and experience; the results of improvements in processes, products and services. TM Steels assimilates and deploys internal and external sources of knowledge, such as:

1. Lessons learnt from non-conformities, corrective actions, and the results of improvement;
2. Gathering knowledge from customers, suppliers and partners
3. Benchmarking against competitors;
4. Capturing knowledge existing within the organisation, e.g. through mentoring/succession planning;
5. Sharing knowledge with relevant interested parties to ensure sustainability of the organisation.
6. Knowledge from conferences, attending trade fairs, networking seminars, or other external events

Sources of external knowledge often include other ISO standards; research papers; webinars from conferences; or knowledge gathered from, or about; our customers, stakeholders or other external parties.

7.2 Competence

Top management identifies emerging competency needs during management reviews and annual appraisals. 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.

To ensure competence of our workers and contractors, job descriptions have been prepared identifying the qualifications, experience and responsibilities that are required for each position that affects product and system conformity. Qualifications include desired requirements for education, skills and experience. Appropriate qualifications, along with the provision of any required training, provide the competence required for each position.

Qualifications are reviewed upon hire, when an employee changes positions or the requirements for a position change. The Compliance Director 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 of training are evaluated to determine if it was effective.

Staff training records are maintained to demonstrate competency and experience. The Compliance Director maintains and reviews the training records to ensure completeness and to identify possible future training needs. Training records are maintained and include as a minimum; copies of certificates for any training undertaken to date, current job description and any other supporting documentation.

Where required; competency training and monitoring is conducted in-house, although for more specialist skills, external seminars or courses are utilised. The effectiveness of training is evaluated and recorded. The company induction includes an introduction to our policies and objectives. Future competency training needs are identified as part of the management review process by reviewing the Competency Review. As a minimum, the following competency-based training is provided:

1. OH&S hazard identification and assessment (as appropriate to the role);
2. Operational controls (including procedures and/or work instructions);
3. Work place and safety and environmental monitoring;
4. Incident management (including investigation methods as appropriate to the role);
5. Process interactions.

7.3 Awareness

TM Steels operates a formal system to ensure that all employees within the organisation are adequately trained and aware to enable them to perform their assigned duties. Those staff whose work is directly related to achieving our organisation's objectives; understand their particular responsibilities and accountabilities within the context of the management system.

All employees are trained on the relevance and importance of their activities, and on how they contribute to the achievement of our policies and objectives through their work. We aim to raise quality, environmental, and occupational health and safety awareness by encouraging involvement with relevant schemes or initiatives.

All staff, whose work directly affects our organisation's environmental impacts, or whom are exposed to health and safety hazards, are briefed to ensure they understand their particular responsibilities and accountabilities within the context of the management system.

Where required, awareness training is conducted in-house to allow the transfer of organisational knowledge but for more specialist skills, external seminars, trainers or courses are utilised. The company induction includes an introduction to our organisation's policy statements and objectives. Future training needs are identified as part of the management review process.

Employees are also encouraged to undertake personal and professional development with plans reviewed on an annual basis at individual annual performance appraisals undertaken by line management. It is a requirement for line managers to refer to the training needs analysis during this appraisal to identify any gaps and/or any refresher training which may be due.

These are added to the personal and professional development plans for the following year. As a minimum, the following awareness training is provided:

1. Understanding of our policies, the management system and its processes
2. Awareness of HSE standards & ACOPs;
3. Significant risks, aspects, impacts, hazards and activities;
4. Accountabilities of specific roles and responsibilities;
5. Consequences of departure from specified procedures or standards;
6. Emergency response procedures and business resilience.

Supporting documentation:

Ref.	Title & Description
09	Competence & Awareness Procedure – TMS-IMS-11

7.4 Communication

7.4.1 General

TM Steels communicates information internally regarding the management system and its effectiveness, through documented training, internal audit reports and continual improvement processes. All managers and supervisors 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 and cross-functional improvement projects.

7.4.2 Internal Communication

Communications regarding how employees contribute to the achievement of objectives are also conveyed and reinforced during employee performance reviews. Issues pertaining to our IMS that may be communicated internally include:

1. Day-to-day operations and general awareness;
2. Quality, environmental and health and safety policy;
3. Information on achieving objectives and targets;
4. Risk and opportunities.

Top management and their direct reports are responsible for communicating the corporate policies as well as the importance of meeting customer, statutory and regulatory requirements to employees within their respective departments.

They ensure that our policies and objectives are understood and applied to the daily work of the organisation through the establishment of measurable goals and objectives. Internal communication occurs on an on-going basis and is achieved through various mechanisms as appropriate:

1. Regular meetings and briefings;
2. Training sessions and training material;
3. Display boards, memorandums, letters;
4. Website, intranet, internal e-mails;
5. Product and process performance data analysis and audit results;
6. Targets, objectives, scorecards, KPIs, management system manual and procedures;
7. Corrective action and non-conformance reports.

7.4.3 External Communication

TM Steels determines the need to communicate information externally to our interested parties, as defined in Section 4.2, regarding the effectiveness of our management system. In most instances, external interested parties (such as consumers, stockholders, neighbouring communities, etc.) are the main driving force for our

organisation to implement our management system. The various processes or means of external communication may include as appropriate:

Interested Parties	Needs & Expectations	Possible modes of Communication
Customers	Price, reliability & value	Publications in the media and focus groups
Distributors & retailers	Price & logistics	Industry association publications and press releases
Owners/Trustees	Profitability & growth	Annual reports or newsletters of performance
Suppliers	Beneficial relationships	Publications via website, meetings or questionnaires
General Public	Environmental responsibility	IMS visibility via company website
Health & Safety Executive	Health and safety responsibility	Compliance submissions, audit results and AFRs
Environment Agency	Environmental responsibility	Compliance submissions and audit results

TM Steels ensures that all external communications are authorized prior to release. Where required, advice appropriate to the context of the communication may be sought concerning the content and dissemination of certain external communications.

1. **Internet** – Information about our IMS is communicated externally via our website.
2. **Enquiries** – TM Steels is subject to the Freedom of Information Act and GDPR which requires a response to external requests for information within specific timescales.
3. **Social Media** – TM Steels manages a LinkedIn account to share information, encourage behavioural change and promote events. Similarly, TM Steels utilises an official Facebook page.

All social media is coordinated by our Managing Director. Responses to external communications are recorded if they are transmitted by email or letter. In each case the response is retained and controlled in accordance with the requirements for documented information.

Supporting documentation:

Ref.	Title & Description
10	Communication & Participation Procedure – TMS-IMS-23

7.5 Documented Information

7.5.1 Management System Documents

TM Steels ensures that our management system includes the documented information required to be maintained and retained by ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, and additionally; any documented information identified by our organisation that demonstrates effective operation. Refer to the Master Document Index on the TM System.

TM Steels applies the following criteria to all types of documented information in order to assess whether the information is necessary for demonstrating the effectiveness of our IMS, and whether it should be formally controlled. Should any of the criteria apply, TM Steels ensures that this information is retained and/or maintained as a form of 'documented information'.

1. Communicates a message internally or externally;
2. Provides evidence of process and product conformity;
3. Provides evidence that planned outputs were achieved;
4. Provides knowledge sharing.

Should any of the above criteria apply, TM Steels ensures that this information is retained and/or maintained as a form of 'documented information' and preserved as organisational knowledge. See 7.1.6.

7.5.2 Creating & Updating

TM Steels ensures that when we create documented information it is appropriately identified and described (e.g. title, date, author, reference number) and is available in an appropriate format (e.g. language, software version, graphics, etc.) and on appropriate media (e.g. paper, electronic).

All documented information is reviewed and approved for suitability and adequacy. Where permanent changes to a document are required, a *request is made* to document owner to consideration and implementation.

7.5.3 Controlling Documented Information

Documented information is retained to provide evidence of conformity to the requirements specified by ISO standards, customer requirements and of the effective operation of our integrated management system.

TM Steels uses standard forms and templates that are accessed via the "Documents" tab on the TM computer system. An electronic document management system, which is backed up and updated as required, is used to retain documented information ensuring only the current versions are available to users. All management system documents are controlled and communicated according to the *Documented Information Procedure* which defines the process for:

1. Approving documents for adequacy prior to issue;
2. Reviewing and revising as necessary and re-approving documents;
3. Ensuring that changes and current revision status of documents are identified;
4. Ensuring that relevant versions of applicable documents are available at points of use;
5. Ensuring that documents remain legible and readily identifiable;
6. Ensuring that documents of external origin are identified and their distribution controlled;
7. Preventing the unintended use of obsolete documents;
8. Ensuring that documents of external origin are identified and their distribution controlled.

Supporting documentation:

Ref.	Title & Description
11	Documented Information Procedure – TMS-IMS-10

8 Operation

8.1 Operational Planning & Control

8.1.1 Quality Operational Planning & Control

TM Steels establishes and implements documented plans and procedures that describe the processes identified in Section 4.4 and the controls required for the provision of products and services in parallel with our objectives, the potential for planned or unintended change, and the risks and opportunities identified in Section 6.1.1. During the planning phase, Top management, the Compliance Director and other responsible personnel identify the following parameters:

1. Objectives and requirements for the product or service;
2. Verification, validation, monitoring, inspection and test requirements;
3. Documented information to demonstrate conformity;
4. Related life cycle aspects, impacts and mitigations;
5. Documented information to demonstrate conformity;
6. Necessary resources; or outsourced processes and their controls;
7. Criteria for process performance and product/service acceptance;
8. Potential consequences and mitigation to change affecting input requirements;
9. Resources necessary to support the ongoing operation and maintenance of the product.

The output of this planning activity includes, as appropriate, documented plans, resource schedules, processes and equipment requirements, procedures and design outputs.

Design and development activities targeted at controlling risks are supported by documented information. This documentation relates the design activities to the identified risks in a way that provides objective evidence that the nature and extent of the design control is reasonable and appropriate to the degree of risk.

8.1.2 Environmental Operational Planning & Control

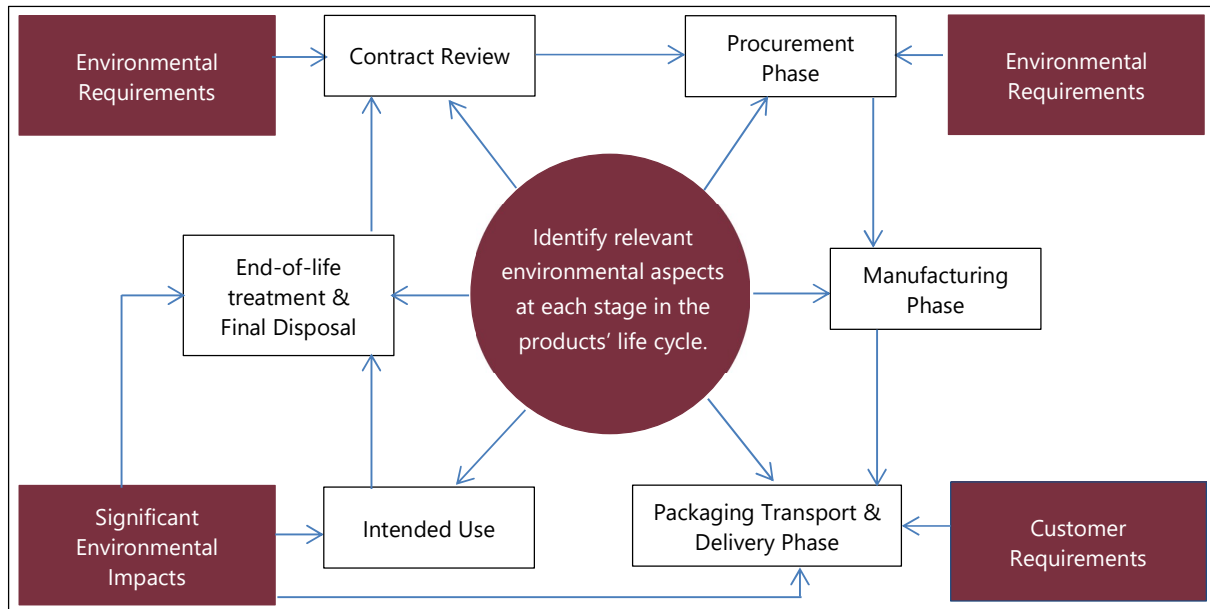
TM Steels considers the environmental requirements and aspects that can be controlled and influenced during each phase of the product life cycle. Where applicable, a life cycle approach is taken within our operational controls so that the environmental impacts at each stage of the life-cycle are identified, assessed, and controlled, or influenced. Refer to Figure 7 below.

By identifying and documenting information about the relevant environmental aspects (6.1.2) and compliance obligations (6.1.4), we are able to prevent or mitigate adverse impacts during each life-cycle phase:

1. Procurement phase;
2. Manufacturing phase;
3. Packaging, transport and delivery phase;
4. Intended use;
5. End of life treatment and final disposal.

The relevant environmental management operational procedures are also applicable to outsourced processes including those undertaken by contractors, the level and extent of control or influence is defined. The controls identified do not absolve us of the responsibility to conform to client, statutory and regulatory requirements but instead they enhance our capacity to effectively manage our supply chain.

Figure 7 The Life-cycle & Environmental Requirements



Our organisation does not control or influence all of the activities of each outsourced process. Only those where our organisation has responsibility for conforming to environmental requirements, in accordance with our aspects, impacts and compliance obligations, are controlled or influenced.

TM Steels establishes and implements documented plans and procedures that describe the processes (Refer to Section 4.3) and the controls required for the provision of products and services in cognizance to the objectives, the potential for planned or unintended change, and the risks and opportunities identified in Section 6.1. During this planning phase, management or other responsible personnel identify the following parameters:

1. Objectives and requirements for the product or service;
2. Verification, validation, monitoring, inspection and test requirements;
3. Documented information to demonstrate conformity;
4. Document information to demonstrate process effectiveness;
5. Necessary resources; or outsourced processes and their controls;
6. Criteria for process performance and product/service acceptance;
7. Potential consequences and mitigation to change affecting input requirements;
8. Resources necessary to support the ongoing operation and maintenance of the product.

The output of planning activity includes documented plans, resource schedules, processes, equipment requirements, procedures and design outputs.

8.1.3 OH&S Operational Planning & Control

TM Steels has established and implemented a system to identify and assess occupational health and safety hazards, refer to 6.1.3, and to implement the appropriate operational controls to mitigate the resulting risks. Occupational health and safety procedures are implemented by all teams and departments using the appropriate management system documentation to ensure that all activities, products and services meet the applicable regulatory standards.

In terms of eliminating hazards and reducing OH&S risks that are presented during our operational activities, TM Steels' plans, implements, and controls processes for managing operational risks to the achievement of applicable requirements, as appropriate to TM Steels' and the product and services, by way of the:

1. Assignment of responsibilities for operational risk management;
2. Definition of risk assessment criteria (e.g., likelihood, consequences, risk acceptance);
3. Identification, assessment, and communication of risks throughout operations
4. Identification, implementation, and management of actions to mitigate risks that exceed the defined risk acceptance criteria;
5. Acceptance of risks remaining after implementation of mitigating actions.

Where appropriate, aspects of product safety are controlled to assure safety during the entire product life cycle as appropriate to the organisation and the product. Examples of these include:

1. Assessment of hazards and management of associated risks (see 6.1.3);
2. Management of safety critical items;
3. Analysis and reporting of occurred events affecting safety;
4. Communication of these events and training of affected workers and contractors.

Outsourced processes are controlled and influenced via purchasing and contractual agreements, documented procedures, contracts, supplier agreements and other management system requirements, 2nd party audits, and performance reviews as appropriate. Where applicable a life cycle approach is taken within the operational controls so that the OHS hazards at each stage can be controlled or influenced.

Supporting documentation:

Ref.	Title & Description
12	Operational Control Procedure – TMS-IMS-06

8.2 Determining Requirements for Products

8.2.1 Customer Communication

In accordance with our commitment to exceed our customers' expectations, TM Steels highlights effective customer communication as an essential element of delivering customer satisfaction. Appropriate handling of customer communication helps to reduce customer dissatisfaction and, in many cases, turn a dissatisfying scenario into a satisfying experience. Customer communication occurs through the following formats, events and processes:

1. Brochures, specifications or technical data sheets relating to our products and services;
2. Enquiries, quotations and order forms, invoices and credit notes;
3. Confirmation of authorized orders and amended orders;
4. Delivery notes and certificates of conformity;
5. E-mails, letters and general correspondence;
6. When customer property is handled or controlled;
7. Customer feedback and complaints management process;

The Managing Director is responsible for establishing methods of communication with our customers and interested parties to ensure that all enquiries, contracts or order handling; including amendments, customer feedback and complaints are handled expeditiously and professionally.

8.2.2 Determining Requirements

TM Steels develops appropriate requirements to ensure that we satisfy the needs and expectations across the socio-technical environment including those of our customers, stakeholders or relevant interested parties.

TM Steels ensures that customer requirements are clearly articulated and that their requirements are captured and understood before the acceptance of an order. Customer requirements include the following:

1. Previous customer requirements which pertain to current parts being ordered;

2. Statutory and regulatory obligations related to the product's lifecycle;
3. Customer specified performance requirements;
4. Any additional requirements will be determined by TM Steels.
5. Requirements not stated by the customer, but which are necessary for specified or intended use.

TM Steels controls the stages of the product lifecycle by establishing environmental requirements for each product during its design and development phase. This is a customer-driven process that requires clear, and often repeated, customer interaction to understand and confirm the customer's needs.

8.2.3 Reviewing Requirements

Prior to committing to the customer, TM Steels ensures and confirms our capacity to supply the required product or service. Pre-acceptance reviews are conducted to ensure that:

1. Product requirements are defined and appropriate;
2. Environmental, and health and safety requirements are defined and appropriate;
3. Requirements are defined for delivery and post-delivery activities such as product or service support;
4. Requirements not stated by the customer but which are necessary for intended use are appropriate;
5. Any additional requirements determined by TM Steels are appropriate;
6. Contract or order requirements differing from those previously expressed are resolved;
7. TM Steels has the ability to meet the defined requirements;
8. Documented information is retained to show the results of the review.

Customer requirements are confirmed before acceptance by the exchange of contracts or purchase orders via appropriate electronic or hard copy formats.

Evidence of requirements review is documented using the Contract Review Checklist.

8.2.4 Changes in Requirements

TM Steels ensures that all relevant documented information; relating to changes in product or service requirements, are authorised and amended where necessary, and that all relevant personnel are made aware of the documented changes to customer requirements.

In order to manage the risks associated with any change to business processes, the Compliance Director identifies and assesses each change that may impact on performance.

Supporting documentation:

Ref.	Title & Description
13	Contract Review Procedure - TMS-IMS-12

8.3 Design & Development

8.3.1 General

Design and Development is not applicable to the Scope of TM Steels' Supply

8.4 Control of Suppliers, External Processes and Contractors

8.4.1 General

The purchasing process is essential to our organisation's ability to provide our customers with products and services that meet their requirements. TM Steels ensures that all purchased products, services and outsourced processes that are incorporated into our final products, or which impact management system performance, conform to specified quality, environmental and OH&S requirements.

TM Steels accomplishes control by closely working with a network of external suppliers, providers and contractors. Their performance and capability are continually assessed through periodic, 2nd party audits, performance data analysis, verification of the supplied products or services, and the inspection of the work of contractors.

The type and extent of control applied to our contractors and suppliers are dependent upon the effect that the supplied product or outsourced process or service may have on our final product output. The following considerations are taken in to account by:

1. Ensuring that we understand the capabilities and competencies of potential suppliers and contractors;
2. Ensuring that we clearly communicate the roles and responsibilities to suppliers and contractors;
3. Defining the quality requirements for the outsourced process, activity, or product;
4. Establishing upfront the criteria for and review of deliverables, frequency of inspections, audits, and other appropriate methods of validation;
5. Selecting and qualifying appropriate suppliers, outsourced process providers and contractors.

Potential product suppliers, process providers and contractors are evaluated using the Supplier Evaluation Form and are added to the Approved Supplier List after successful evaluation. The Purchasing Manager evaluates and selects suppliers based on their ability to supply products or services in accordance with specified quality, environmental, and occupational health and safety requirements. This approach helps to mitigate any identified significant environmental aspects and OH&S hazards during procurement of goods and services and to ensure that our procurement operations remain compliant with our:

1. Corporate policies and objectives;
2. Sustainable development procurement policy;
3. Register of environmental compliance obligations
4. OH&S legal requirements and other requirements;
5. Environmental aspects register;
6. Hazard identification and assessments.

Additionally, other internal resources may be called upon to assist as required. The criteria for the selection, evaluation and re-evaluation are defined and communicated in the Purchasing & Procurement Procedure, while records of the results of evaluations and any necessary actions arising from the evaluation are retained.

8.4.2 Purchasing Controls

TM Steels applies and documents quality, environmental and OH&S criteria to the selection of our suppliers and contractors. The criteria are agreed and communicated via contractual documents.

TM Steels has established and implemented a process of incoming inspection to ensure that purchased products conform to:

1. Purchase orders and delivery notes;
2. Product specifications;
3. National or international standards.

Purchased items and delivery notes are checked against the purchase order to confirm that the identity and quantity are correct. The inspection is recorded on the Goods Received Note. Satisfactory items are placed in stock. In the event that items are rejected on receipt, a non-conformance report is raised and the supplier contacted to arrange replacement or credit.

Where appropriate, risk control measures are applied to outsourced process or products. Risk control measures, and their importance, are documented within the purchasing data and clearly communicated to the supplier. The

frequency of contract reviews with each supplier varies depending on their performance at any time and the interval between reviews varies from monthly to annually.

8.4.3 Purchasing Information

TM Steels uses purchase orders to describe the product or service to be purchased. Designated individuals within the company create purchase orders using the company system. They also ensure the adequacy of the requirements that are specified by the purchase order prior to release. Each purchase order includes where appropriate:

1. Identification of product or service to be delivered, quantity, delivery date, and cost;
2. Requirements for approval or qualification of product, procedures, processes or equipment;
3. Requirements of the supplier's management system
4. Competence of contractors;
5. Contractual requirements and operating criteria.

Where appropriate, the roles and responsibilities for risk management on the part of the manufacturer or supplier are defined as part of the purchasing requirements. In addition, prescribed risk control measures are included in the purchasing requirements as part of the purchasing information which clearly communicated to the supplier or manufacturer.

Supporting documentation:

Ref.	Title & Description
15	Purchasing & Procurement Procedure TMS-IMS-09

8.5 Production & Service Provision

8.5.1 Control of Production & Service Provision

In order to control the planning, administrative support and implementation of work, our organisation's policy is to describe the work methods, the controls applied and the records required. The process control activities are quality with many aspects that also relate to quality control. The following controlled conditions are applied where applicable:

1. Quality control checks are performed using appropriate measuring equipment;
2. Handling, storage and transportation;
3. Evidence of completed inspections;
4. Detailed process work instructions and specifications for all products;
5. Criteria for workmanship, competence and plant maintenance.

In cases where special processes are employed where the results of which cannot be easily checked, including any processes where deficiencies become apparent only after the product is in use. Validation demonstrates the ability of these processes to achieve planned results by:

1. Defining qualification criteria and approval of special processes prior to use;
2. Defining criteria for review and approval of the processes;
3. Approval of equipment and qualification of workers and contractors;
4. Use of specific methods and procedures;
5. Requirements for records;
6. Revalidation.

Production information such as the rate of non-conformities, the rate of rework, scrap, yield, and other sources of quality data are evaluated and or compared against the current risk management output to confirm adequacy and completeness of risk controls.

8.5.2 Identification & Traceability

In order to preserve the conformance of products to customer requirements during internal processing and delivery, TM Steels identifies the product throughout the product realisation process:

1. Stored equipment and materials are identified as to type, description and inspection status;
2. Unacceptable items are identified as such and are removed from the normal work flow;
3. All enquiries are identified with a unique estimate number, allocated on receipt;
4. Subsequent orders are identified by contract number.

Where appropriate, the Compliance Director has implemented an identification system allows for traceability from finished product back to incoming material records and customer specifications. All parts, products and materials, either purchased or manufactured, are identified with part numbers and or job numbers and where applicable, serial numbers, which link the parts, products and materials to their respective documentation.

When required by the customer, traceability is maintained from receipt of parts to delivery of the final products. The Compliance Director maintains records that trace part numbers to their corresponding drawings, specifications and any other relevant documentation such as product configuration records that trace serial numbers of products to their parts lists. Final product serial numbers are recorded on shipping documentation to provide traceability to the end user (customer) and to the originating work order.

8.5.3 3rd Party Property

TM Steels identifies, verifies, protects and maintains customer property provided for use. The Compliance Director ensures that lost, damaged or unsuitable customer property is recorded and immediately reported to the customer. In cases where the customer provides drawings, specifications, etc., they are managed as documented information. Customer property can also include customer-owned materials, tools (including packaging), tooling (including test/inspection tooling and equipment), and intellectual property.

1. Unless otherwise defined by contract, upon receipt of customer property, our organisation will examine items for completeness, proper identification and possible transit damage and identifies these items as the property of the relevant customer;
2. Items found to be non-conforming are quarantined, tagged and recorded as defined in the Non-conforming Output Procedure and brought to the immediate attention of the customer;
3. No customer property is released for further processing or storage until such time as all required verification and testing activities are completed and the results are found to be acceptable;
4. After receipt, care is exercised to ensure the protection of customer property against loss or damage until such time as it is incorporated into the product or returned to the customer;
5. The identification, segregation, handling, and protection of customer property from time of receipt, subsequent storage, maintenance, during the entire realization cycle are performed in accordance with Section 8.5.4 and any applicable contract requirements;
6. In the event that customer property is lost, damaged or otherwise identified as unsuitable for use while under our control, these conditions shall be recorded and reported to the customer.

8.5.4 Preservation

TM Steels ensures that all products and materials are handled and stored appropriately at all stages of the development cycle to prevent damage or deterioration. Products and materials are stored in designated storage areas with appropriate control of inbound receipts and outbound releases.

Products in storage are periodically assessed. All packaging is sufficient to ensure product quality while in storage and during delivery to the customer:

1. Components and products are handled and stored in a manner that prevents damage or deterioration, pending use or delivery;
2. Controls are implemented to prevent mixing conforming and non-conforming materials;

3. Packing ensures specified or original manufacturing packaging is utilised;
4. All products are suitably packed to prevent deterioration or damage during storage and delivery.

Completed products awaiting packaging and shipping are protected to prevent damage from vibration, shock, abrasion, corrosion, humidity, temperature, or any other conditions that may occur during handling or storage.

8.5.5 Post-delivery Activities

TM Steels determines the customer's requirements for post-delivery activities before accepting an order. In determining the extent of post-delivery activities that are required, we consider:

1. Statutory and regulatory requirements;
2. The potential undesired consequences associated with our products and services;
3. The nature, use and intended lifetime of our products and services;
4. Customer requirements;
5. Customer feedback.

Post-delivery activities also include as appropriate actions under warranty provisions, contractual obligations such as maintenance services, and supplementary services such as recycling or final disposal.

8.5.6 Control of Changes

Changes to the production and service provision requirements are identified, communicated and recorded as appropriate. Any unplanned changes are reviewed, verified, validated and approved to ensure that products and services continue to meet their specified requirements, in such a way that conformity with requirements is maintained. Changes are documented and information is retained about changes, including who authorized the change, and the actions arising from the change.

Supporting documentation:

Ref.	Title & Description
16	Product & Service Provision Procedure – TMS-IMS-17

8.6 Release of Products & Services

The extent and sequence of the required inspection and test are specified in documented procedures, work instructions and manufacturing planning documents in order to demonstrate that the specified requirements are met.

The amount and nature of inspection and test are based on the importance of the product characteristic, the process control exercised and the specified requirements. All inspection and test activities are carried out by competent, authorized workers. TM Steels uses the following methods as a means to ensure product acceptance.

1. **Incoming inspection** – Incoming material is withheld pending completion of required inspection or receipt of objective evidence of conformance from the supplier;
2. **First-article inspection and testing** – Typically the first produced unit that both the customer or supplier agree to use as the required base-line standard for all following units;
3. **In-process inspection and testing** – Products are withheld from further processing until there is objective evidence that the required inspection and test have been performed;
4. **Final inspection and testing** – Evidence that all inspections and tests that were required during previous stages of manufacturing were performed and documented as meeting the requirements.

Measurement and acceptance criteria that are necessary for product acceptance are retained as documented information; subsequent acceptance records form the production documentation evidence which includes the following information:

1. Criteria for acceptance and rejection;

2. Locations in the process sequence where measurement and testing operations were performed.
3. Types of measurement instruments used, including any instructions associated with their use.
4. Test records showing actual test results where required by the specification or acceptance test plan.

Documented information is retained to indicate the person authorising 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.

Supporting documentation:

Ref.	Title & Description
17	Testing & Inspection Procedure – TMS-IMS-15

8.7 Non-conforming Outputs

TM Steels ensures that provisions are made for the identification and control of all non-conforming outputs and materials including non-conforming product return by a customer, in order to prevent the inadvertent use or shipment of non-conforming products and the unnecessary costs associated with the processing of non-conforming products.

The Non-conforming Outputs Procedure defines the responsibilities, authorities and methods used for the identification, segregation, review and disposition of non-conforming products, as well as the implementation of corrective action in order to prevent recurrence of the non-conformance, and action appropriate to the effect, or potential effects, of the non-conformity when non-conforming product is detected after delivery or use has started.

Records, clearly identifying the product, the nature and extent of nonconformance, the approved disposition and corrective action taken are maintained and as documented information in accordance with Section 7.5. Disposition of 'use-as-is' or 'rework' is only used after approval by an authorised representative of the organisation responsible for the design.

Documented information concerning the nature of any non-conformances, the resolving authority, and the resulting corrective actions is retained. Where necessary, details concerning any authorized concessions are documented as evidence of acceptance.

Supporting documentation:

Ref.	Title & Description
18	Non-conforming Outputs Procedure – TMS-IMS-19

8.8 Emergency Situations

TM Steels has identified potential emergency situations pertaining to our business operations which may lead to an undesired environmental impact or health and safety hazard. The Compliance Director in conjunction with the Management Team are responsible for ensuring that procedures and practices are established for preventing and responding to emergency situations.

The Emergency Management Plan is jointly owned by the Compliance Director with responsibilities assigned to a dedicated Emergency Response Team, which includes trained Fire Marshals and 1st Aiders, and is periodically tested by during regular drills. The Emergency Management Plan is initiated in the event of an emergency arising from the following environmental hazards:

1. Flood, fire, natural disaster;
2. Accident, incident or near miss;
3. Release of chemical substances;

The Emergency Situations Procedure and related documents address the following:

1. Identification of potential and actual accidents and emergency situations;
2. Proper response to emergencies and prevention or mitigation of serious environmental impacts;
3. Provisions for periodic reviews and revisions of the procedures;
4. Such reviews are always initiated after the occurrence of such events;
5. Periodic drills to test the effectiveness of emergency preparedness and response procedures;

Records of environmental incidents, near-misses and non-conformities with IMS procedures are documented. In the event of an incident, non-conformity, or near miss, members of staff involved or witnessing the incident are responsible for reporting the event to the Compliance Director who is responsible for investigating the issue to establish the root cause.

Supporting documentation:

Ref.	Title & Description
19	Emergency Situations Procedure – TMS-IMS-16

9 Performance Evaluation

9.1 Monitoring, Measurement, Analysis & Evaluation

9.1.1 General

TM Steels applies suitable methods for determining which aspects of the IMS and its processes are to be monitored, measured, analysed and evaluated. The frequency at which our processes are monitored, measured, analyzed and evaluated is determined and informed by:

1. Statutory and regulatory requirements.
2. Customer feedback and specification requirements.
3. Process and management system requirements and the criticality for product conformity.
4. Process performance and audit results.
5. Level of risk and types of control measure.
6. Trends in non-conformities or corrective actions.

All monitoring, measuring, analysis and evaluation outputs are documented and analyzed to determine process effectiveness and to ensure their effectiveness in achieving in-tolerance results, and to identify opportunities for improvement:

1. In-process checks relate to both quality control and productivity checks;
2. Provision is made for the identification and resolution of non-conformances;
3. The emphasis is to prevent any problems which might affect customer satisfaction;
4. In-process checks are performed and documented;
5. Where specific inspection points are required these are identified at the contract planning phase.

Where applicable, all measurements, analyses, and test and inspection records are retained as documented information for a minimum of three years. This documented information includes details of the final inspection authority to confirm that all critical parameters are in accordance with the established requirements and specifications. Additionally, product samples are stored and protected for five years.

Products are not normally released or delivered until all planned inspections and tests have been completed and that documented information exists to provide evidence of conformity with acceptance criteria and which identifies the person(s) authorizing release. In rare cases (due to customer requirements and/or production emergencies) unverified product may be released or delivered under controlled conditions of positive recall, as documented and approved by the customer or supplier.

9.1.2 Customer Satisfaction

The success in meeting our customer's requirements and in achieving a high level of customer satisfaction with TM Steels' products and services is evaluated on a regular basis, at least annually. This is done using, but is not limited to, on-time delivery performance, warranty analysis, in-service performance monitoring, customer complaint analysis, annual customer satisfaction surveys, and other appropriate means. The customer satisfaction results are summarized for discussion at management reviews.

TM Steels has developed and implemented plans for customer satisfaction improvement that address any deficiencies identified by these evaluations and to assess the effectiveness of the results. TM Steels has implemented a method of handling customer enquiries and is established to provide a rapid response to customers who have an urgent need for assistance, or a complaint, which would adversely affect customer satisfaction.

Supporting documentation:

Ref.	Title & Description
20	Customer Satisfaction Procedure – TMS-IMS-07

9.1.3 Analysis & Evaluation

In order to identify opportunities for improvement, Top management, Compliance Director and other managers, as appropriate, routinely collect and analyse data using appropriate statistical and non-statistical techniques to determine the suitability and effectiveness of key management system processes using data points applicable to their area(s) of responsibility.

Effectiveness is measured in terms of product quality, environmental compliance, process accuracy, delivery schedule performance, cost and budgetary performance, employee performance against established objectives and levels of customer satisfaction. In order to identify ongoing strengths, weaknesses, threats and opportunities within our integrated management system, TM Steels monitors and analyzes trends using the following data points:

1. Characteristics of processes, products and their trends;
2. Conformity to product, customer, environmental and legal requirements;
3. Customer satisfaction and perception data;
4. Supplier and external provider performance data;
5. Results of actions taken to address risks and opportunities;
6. Effective implementation of integrated management system planning;
7. Improvement opportunities identified during internal audits and management reviews.

Control limits for process and product performance are expressed as objectives, and targets and are disseminated via documented information as appropriate.

TM Steels undertakes corrective action when the data shows a trend toward the pre-defined control limit. Employees, who utilize statistical tools to analyse; measure and verify outputs, are competent to ensure proper deployment of these techniques.

9.1.4 Evaluation of Compliance

Conformance with current environmental and health and safety legislation is reviewed, and evidence of evaluation is maintained through the management review process. In addition to monitoring and measurement of operational activities, the Compliance Director periodically evaluates our compliance with all applicable legal requirements, compliance obligations and other requirements to which we subscribe.

In most cases, monitoring and measurement is an on-going process intended to collect data required by legal and other requirements. The evaluation of compliance analyzes and compares the data collected over a period of time in comparison with our stated compliance obligations and legal requirements as defined in the Legal & Compliance Register.

Supporting documentation:

Ref.	Title & Description
21	Analysis & Evaluation Procedure – TMS-IMS-26

9.2 Internal Audit

9.2.1 General

Internal audit results are critical inputs that help to assess the effectiveness of our IMS. TM Steels' internal audits use risk-based thinking and the notion of continual improvement as the main drivers. Internal audits are

conducted at planned intervals to determine whether the management system conforms our organisation's planned arrangements and to the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.

9.2.2 Internal Audit Programme

The internal audit programme, coordinated by the Compliance Director, details the frequency and general focus of each internal audit and is recorded and communicated within the Internal Audit Programme. TM Steels' internal audit programme is based upon a strategy that considers the status and importance of each process comprising the scope of our IMS.

The audit frequency is also based upon process performance trends, results from previous audits, levels of customer satisfaction, rates of non-conformity and corrective action, etc. to ensure that our organisation focuses on the aspects that affect product and process conformity the most.

The criteria, scope, frequency and methods of each audit are defined in the audit reports. The selection of trained auditors and their subsequent impartial conduct ensures objectivity throughout the audit process and that:

1. The results of each are reported to Top management;
2. That timely appropriate corrective action undertaken where required;
3. They retain documented information such as audit checklists and audit reports as evidence of the effective implementation of the audit programme in respect of each audit.

Internal auditors are selected to ensure objectivity and impartiality of the audit process. This is achieved by selecting a team of auditors from cross-functional departments who have received the appropriate training in the auditing process.

The audit is conducted according to the Internal Audit Procedure to ensure that timely corrective actions are implemented to correct any deficiencies found. The results of the audits are recorded and submitted to the personnel having responsibility in the area audited. The results of the internal quality audits are summarized for discussion at management reviews.

Supporting documentation:

Ref.	Title & Description
22	Internal Audit Procedure – TMS-IMS-14

9.3 Management Review

9.3.1 General

To ensure the continuing suitability, adequacy and effectiveness of our IMS in meeting our organisation's strategies, Top management conducts formal management review meetings at planned intervals. The requirements for conducting management review are defined and communicated using the Management Review Procedure.

In summary, a Director chairs the Management Review Meeting. The review group is coordinated and recorded by the Compliance Director. To ensure that the review group includes each of the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018, the Management Review Agenda & Minutes are prepared and distributed by the Compliance Director.

9.3.2 Inputs

The primary management review inputs comprise data from conformance and performance measurements that are gathered at key quality, environmental, and health and safety data points from various processes and activities. Subsequent reported recommendations for improvement are based on the evaluation of such measurements.

Conformance is primarily assured through internal audits and demonstrated through a review of audit results and our demonstrated ability to detect, correct and to prevent problems. Performance is primarily assured through the deployment of corporate and operational level objectives, and through the review of our demonstrated ability to achieve desired results. The management review evaluates the need for change and to establish actions to improve our IMS, its processes and resource needs. The management review is led by a director and considers the following:

1. The suitability of our IMS policies;
2. The impact of changes in compliance obligations;
3. The management of risk and opportunity;
4. IMS objectives, targets and performance indicators;
5. Changing expectations and requirements of relevant interested parties;
6. Changes in the products or organisational activities;
7. Changes to the organisational structure;
8. Communication and feedback from employees and customers;
9. Change management effectiveness;
10. Workplace, environmental, and occupational health and safety monitoring;
11. The status of non-conformities and corrective actions;
12. Performance statistics, including summaries of safety statistics and environmental monitoring results.
13. Findings of completed audits and reviews;
14. Follow up on actions from previous management reviews;
15. Recommendations and opportunities for improving the effectiveness of the IMS.

9.3.3 Outputs

The primary outputs of management review meetings are management actions that are taken to make changes or improvements to our quality management system. During management review meetings, Top management identifies appropriate actions to be taken regarding the following issues:

1. Improvement of the effectiveness of the IMS and its processes;
2. Improvement of product related to customer requirements;
3. Opportunities and risks;
4. Significant environmental aspects;
5. Resource needs.

The primary outputs of management review meetings are the actions necessary to make changes or improvements to our IMS. 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 in the management review minutes. Management review minutes are retained and include:

1. Decisions and actions relating to possible changes to policies, objectives and targets;
2. Information relating to revised risks and any proposed treatment and controls;
3. Improvement suggestions for inclusion into future management plans;
4. Any other alternation, modification and improvement to the IMS that demonstrates a commitment to continual improvement.

Relevant outputs from the management reviews are made available for communication and consultation throughout our organisation.

Supporting documentation:

Ref.	Title & Description
23	Management Review Procedure – TMS-IMS-02

10 Improvement

10.1 General

The Compliance Director uses a range of the performance evaluation tools highlighted in Section 9 to make recommendations for improvement and to achieve the intended outcomes of our IMS. For example, recommendations may emerge from the review groups and from findings raised in internal audits.

In order to determine and select opportunities for improvement or to implement any necessary actions to meet the requirements of customers and relevant interested parties, or to enhance customer satisfaction, TM Steels drives improvement via the analysis of relevant data. The data inputs for the improvement process include:

1. Risk and opportunity evaluations;
2. Assessment of the changing needs and expectations of interested parties;
3. The conformity of existing products and services;
4. The effectiveness of our IMS;
5. Supplier performance;
6. Environmental performance;
7. Reducing or eliminating adverse environmental impacts;
8. Reducing or eliminating adverse OH&S hazards;
9. Increasing beneficial impacts and opportunities;
10. Levels of customer satisfaction, including complaints and feedback;
11. Internal and external audit results;
12. Corrective action and non-conformance rates;
13. Data from process and product characteristics and their trends.

TM Steels also ensures that opportunities for improvement from daily feedback on operational performance are evaluated by the Compliance Director as appropriate. Changes are typically implemented through the corrective action system. Opportunities for improvement from analysis of longer-term data and trends are evaluated and implemented through the management review process and are prioritized with respect to their relevance for achieving our quality and environmental objectives.

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

10.2 Incident, Non-conformity & Corrective Action

10.2.1 Non-conformity & Corrective Action

All non-conformities are reported to the Compliance Director in order that an investigation can be initiated using the Non-conformity & Corrective Action Procedure. The appropriate manager documents the non-conformity using the Non-conformance Report and together with process owners, they consider the root-cause of the non-conformity.

Where necessary, other competent parties are consulted to identify the root cause and plan appropriate action. The Compliance Director records the non-conformance together with any agreed corrective action within the NCR System.

The appropriateness and effectiveness of any corrective action is reviewed during documented reviews, and via the internal audit process, and reported as necessary to Top management. Evidence of non-conformity, customer dissatisfaction or process weakness is used to drive our continual improvement system. Since problems may

already exist, they require immediate correction and possible additional action aimed at eliminating or reducing the likelihood of its recurrence.

Follow-up audits are conducted in accordance with the internal audit process to ensure that effective corrective action is implemented and that the action is appropriate to the impact and nature of the problem encountered. In addition, the Compliance Director summarises and analyses 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 resulting corrective actions are reviewed by the Compliance Director for effectiveness and are reported to Top management in order to determine if changes to the IMS are required, or whether any new risks or opportunities need to be considered during planning.

The corrective actions are considered effective if the specific problem was corrected and subsequent 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.

Supporting documentation:

Ref.	Title & Description
24	Non-conformity & Corrective Action Procedure – TMS-IMS-08

10.2.2 Incident Investigation

TM Steels has implemented the Incident Investigation Procedure for the handling of, and the investigation of accidents, incidents and near misses. The procedure defines the controls for reporting and investigating all types of accident, incident or near miss that may occur on our premises.

By identifying the root cause and implementing relevant corrective actions, we aim to avoid reoccurrence. Records are maintained of any changes to the documented procedures resulting from corrective action.

Records of occupational health and safety issues and non-conformities with the occupational health and safety management procedures are documented. In the event of an accident, incident, or near miss; members of staff involved or witnessing the incident are responsible for completing an Incident Report.

The report is sent to the Compliance Director who is responsible for investigating all accidents, incidents and near-misses using the Incident Investigation Form, to establish the root cause.

Supporting documentation:

Ref.	Title & Description
25	Incident Investigation Procedure – TMS-IMS-21

10.3 Improvement

TM Steels continually improves the effectiveness of our IMS through the effective application of our corporate policies, objectives, auditing and data analysis, corrective and preventive actions, and management reviews.

The continual improvement process begins with the establishment of our corporate policies and objectives for improvement, based on objectives contained in our business plans and customer targets and goals. Customer satisfaction, internal audit data, process and product performance data, and the cost of poor quality or risk control are compared against objectives or KPIs to identify additional opportunities for improvement.

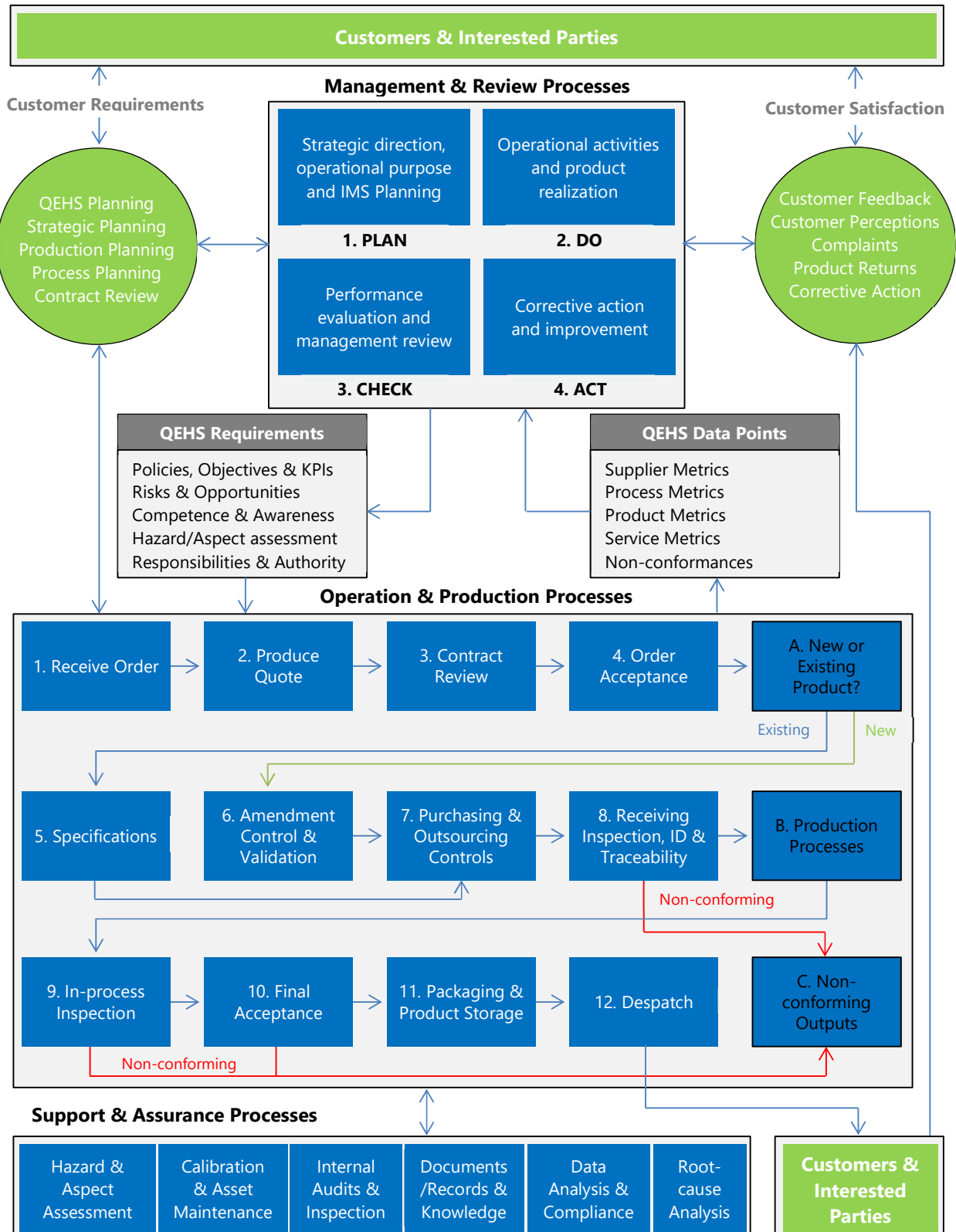
The overall effectiveness of continual improvement program, including the effectiveness of any corrective actions, as well as the overall progress towards achieving corporate level improvement objectives, are assessed through our management review process.

Supporting documentation:

Ref.	Title & Description
26	Continual Improvement Procedure – TMS-IMS-20

Appendices

A.1 QEHS Process Interaction



A.2 Organisation Chart

