Integrated Management System Manual

Incorporating

Quality Management
Environmental Management
Health & Safety Management

Issue 16
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Contents

1 INTRODUCTION

M&H Plastics offers a full compliment of packaging services and solutions including the manufacture, assembly and decoration of plastic bottles, jars, caps, moulded components and flexible tubes for the health and beauty markets and associated sub sectors of these markets

M&H Plastics operates an Integrated Management System (IMS), which encompasses all aspects of activities and incorporates quality, environment, health and safety management, operated within the boundaries of the Beccles site. This Manual provides an overview of the management structure, which uses operating procedures and associated work instructions to ensure best working practices and compliance with legislation throughout the Company. The IMS is based upon but not limited by, the requirements of ISO 9001:2000, ISO 14001:2004, OHSAS 18001:1999 and our own policies.

The principle objective is to produce components of the optimum practical quality, with minimum detrimental effect upon the environment whilst ensuring the health and safety of our employees. The resources necessary to achieve this aim, both in terms of finance and personnel, are made available by the Directors of the Company.

Ultimate responsibility for the operation of the IMS rests with the Executive Board of Directors. The Board's representative, responsible for the day-to-day operation of the IMS, is the Technical Director.

As all product is tested prior to release there is no requirement for clause 7.5.2 of ISO 9001:2000, Validation of processes

Manual prepared by:

Manual authorised by: Director

2 QUALITY POLICY

2.1 M&H Plastics offers a full compliment of packaging services and solutions including the manufacture, assembly and decoration of plastic bottles, jars, caps, moulded components and flexible tubes for the health and beauty markets and associated sub sectors of these markets.

2.2 The Quality policy of M&H Plastics is to assure customer satisfaction by ensuring that customers' quality requirements are determined, satisfied and recorded throughout all phases of contract performance.

2.3 To implement this policy, M&H Plastics maintains an effective, Company-wide quality programme. It is therefore part of every member of staff's job to contribute towards producing products of acceptable quality.

2.4 The quality programme outlined in this Manual complies with, but is not limited to, the requirements of BS EN ISO 9001:2000.

2.5 To ensure continual improvement of quality performance, the Company periodically determines quality objectives, which are published in, and form part of, the IMS Management Programme.

3 ENVIRONMENTAL POLICY

3.1 M&H Plastics offers a full compliment of packaging services and solutions including the manufacture, assembly and decoration of plastic bottles, jars, caps, moulded components and flexible tubes for the health and beauty markets and associated sub sectors of these markets.

3.2 M&H Plastics shall endeavour to conduct its business in such a way as to minimise the detrimental impact upon the environment. The environmental management system outlined in this Manual complies with, but is not limited to, the requirements of ISO 14001:2004.

3.3 The Company's commitment to environmental issues is reflected in the continual monitoring and subsequent control of the environmental management system, which, together with environmental objectives and targets, contribute towards continual improvement of environmental performance.

3.4 The control aspect of the environmental management system is itself reviewed by Senior Management as part of the Company's commitment to continual improvement.

3.5 The Company is committed to the prevention of pollution of the environment. This commitment has been incorporated into our environmental system, which ensures the minimum practical amount of emissions and ensures compliance with all relevant legislation.

3.6 To ensure continual improvement of environmental performance, the Company periodically determines environmental objectives, which are published in, and form part of, the IMS Management Programme.

4 HEALTH AND SAFETY POLICY

4.1 M&H Plastics offers a full compliment of packaging services and solutions including the manufacture, assembly and decoration of plastic bottles, jars, caps, moulded components and flexible tubes for the health and beauty markets and associated sub sectors of these markets;

4.2 M&H Plastics operates a health and safety system that forms an integral element in all aspects of Company activities. It is the Company's wish to conduct its activities with the minimum practical risk to its employees.

4.3 The health and safety system outlined in this Manual complies with, but is not limited to, the requirements of OHSAS 18001:1999 and ensures compliance with the requirement of the Health and Safety at Work Act 1974.

4.4 Legal conformance is maintained as a minimum, but the Company aims to exceed minimum requirements through a programme of continual improvement and development.

4.5 The Executive Board of Directors ensures that all necessary resources are available to ensure that the health and safety of the employees is not compromised.

4.6 It is emphasised that health and safety is the responsibility of all members of staff and a principal responsibility of Management and Supervisors.

4.7 All members of staff are made aware that the health and safety system applies to the entire Company and are trained to an appropriate level that ensures understanding of the health and safety issues pertaining to their particular job or jobs.

4.8 All aspects of the health and safety system are openly available for question or criticism by employees. Comments made through formal channels will be responded to by Health and Safety Management.

4.9 This policy is reviewed annually as part of the management review procedure and is available to all interested parties upon request.

4.10 To ensure continual improvement of health and safety performance, the Company periodically determines health and safety objectives, which are published in, and form part of, the IMS Management Programme.

5 HYGIENE POLICY

5.1 M&H Plastics is committed to maintaining the highest practical levels of hygiene throughout the entire manufacturing and delivery cycle.

5.2 It is recognised that good hygiene is an essential element in the manufacture of high quality products and therefore the following requirements exist for all areas of activity.

5.3 High risk areas have designated hygiene zones. Within these areas, all employees must wear company supplied hats to reduce the risk of hair contaminating the product. The hats must be worn correctly and there the hair is long it must also be tied back. The exception (with the agreement of the departmental Manager) is for staff with hair less than 2mm in length.

5.4 Gloves must be worn where components are handled on a regular basis, such as during decoration/packing/sorting.

5.5 Washing facilities are provided adjacent to all production areas and hand sanitizer stations are positioned at the entrance to all production units.

5.6 All floor surfaces are kept clean and tidy. Cleaning is performed in accordance with a pre-determined schedule.

5.7 All machines are kept as clean as is practically possible and are maintained to a level which prevents contamination of the product. Cleaning is carried out to a defined programme.

5.8 External doors and windows are screened to minimise the possibility of insect entry to either production or warehouse areas.

5.9 Pest control is effected by the utilisation of a subcontracted high standard pest control system.

5.10 To ensure product integrity during transit, all finished product is packaged with a protective layer of polythene, inside sealed cardboard boxes, stacked on pallets with a protective sheet covering the top boxes and the pallet is stretch-wrapped.

5.11 Smoking is only permitted in designated smoking shelters.

5.12 The consumption of food is prohibited in production and warehouse areas.

5.13 Jewellery is not permitted in where there is open product with the exception of a plain wedding band, plain bracelet (if tight to the skin) and (if sanctioned by the departmental Manager) an SOS medical pendant worn under clothing. Any jewellery that cannot easily be removed can be worn but must be covered with tape. In other areas it is advised that watches and jewellery are not warn for safety reasons. Any personal possessions or adornments lost in production areas must be reported to the Departmental Manager immediately.

5.14 Glass and hard plastic is regarded with the utmost seriousness. Any such breakage in an area where there may be open boxes results in the stopping of any machinery, the disposal of any product and packaging that may be affected and a thorough cleaning of the area before production recommences. All items used for cleaning and disposed of or themselves cleaned away from the production area.

5.15 Good hygiene within the Company is aided by, but not limited to, the above factors and continual improvement in hygiene is considered to be a Company objective.

6 RESPONSIBILITIES AND COMMUNICATION

Directors

.1 The ultimate management responsibility for all quality, health, safety and environmental matters rests with the Executive Board of Directors of M&H Plastics. Day-to-day responsibility for these areas is delegated to the QHSE Manager, who reports directly to the Technical Director.

.2 The Technical Director assumes responsibility for ensuring compliance with the respective quality, environmental and health and safety recognised standards.

.3 In the event of a non-conformance, the Directors are responsible for ensuring that any determined corrective actions to rectify the immediate problem, and preventative action designed to prevent recurrence, are acted upon in such a way as to ensure that every failure is seen as an opportunity for continual improvement.

.4 The Production Director is responsible for ensuring effective communication throughout the Company from shop floor to management. Observations and suggestions are responded to and Board members are informed of the performance of the IMS. All received communication that relates to environmental aspects of the system shall be appropriately assessed and responded to by the Production Director or his nominee. Both the original communication and any response to both internal and external communications are retained in the QA Office.

.5 The Directors are responsible for ensuring that all training necessary to produce high quality products without unnecessary risk to either the environment or the health and safety of the workforce is provided.

.6 The Financial Director is responsible for ensuring that liability is covered by insurance and that the details are communicated to any relevant parties. Review of the insurance records and administration of claims forms is also the responsibility of the Financial Director.

.7 The Directors assume the responsibility for ensuring that all necessary resources are available to satisfy the requirements specified in this Manual.

Managers

.8 Departmental Managers are answerable to the Directors and responsible for the day-to-day operation of the IMS, including the quality of the product their department is producing and the continual promotion of quality, health, safety and environmental awareness amongst the staff under their control. The QHSE manager is also responsible for recommending improvements and ensuring that any recommendations made reach top management.

.9 It is the responsibility of the Departmental Managers to ensure that the necessary training and instruction is provided for all staff under their control.

.10 To ensure that employees can operate safely and efficiently, the Departmental Managers ensure that the workplace is clean and free from obstruction and that all guards and safeguards are in place at all times. All prescribed notices and records are displayed within the department and all tools, equipment and protective wear are available and are fit for purpose.

.11 All injuries, near misses and reportable diseases are reported under the control of the Departmental Manager and progressed in accordance with the RIDDOR WI.

Supervisors

.12 Supervisors are responsible for ensuring, through instruction and training that safe methods of work are employed during all activities and that operating procedures, work instructions and other processes, are followed.

.13 It is the responsibility of Supervisors to ensure that supplied protective equipment is used, that environmental considerations such as waste disposal and spillage clean-ups are performed correctly and that the quality of components is not compromised.

.14 Supervisors assume the day-to-day responsibility for ensuring that all specified tools and equipment are used.

.15 The Supervisors are responsible for encouraging and maintaining effective communication between workforce and management on all quality, health, safety and environmental issues.

Employees

.16 All employees are responsible for their own health and safety and for the health and safety of their colleagues and, as such, must conform to the requirements of the IMS. M&H Plastics operates an open system that allows all staff direct access to the Directors of the Company and to all details of the health and safety system.

.17 Employees are required to co-operate with the Company, so far as it is necessary, to enable any regulations imposed upon the Company to be complied with.

.18 It is the responsibility of all employees to report all injuries, diseases or major incidents to their immediate Supervisor.

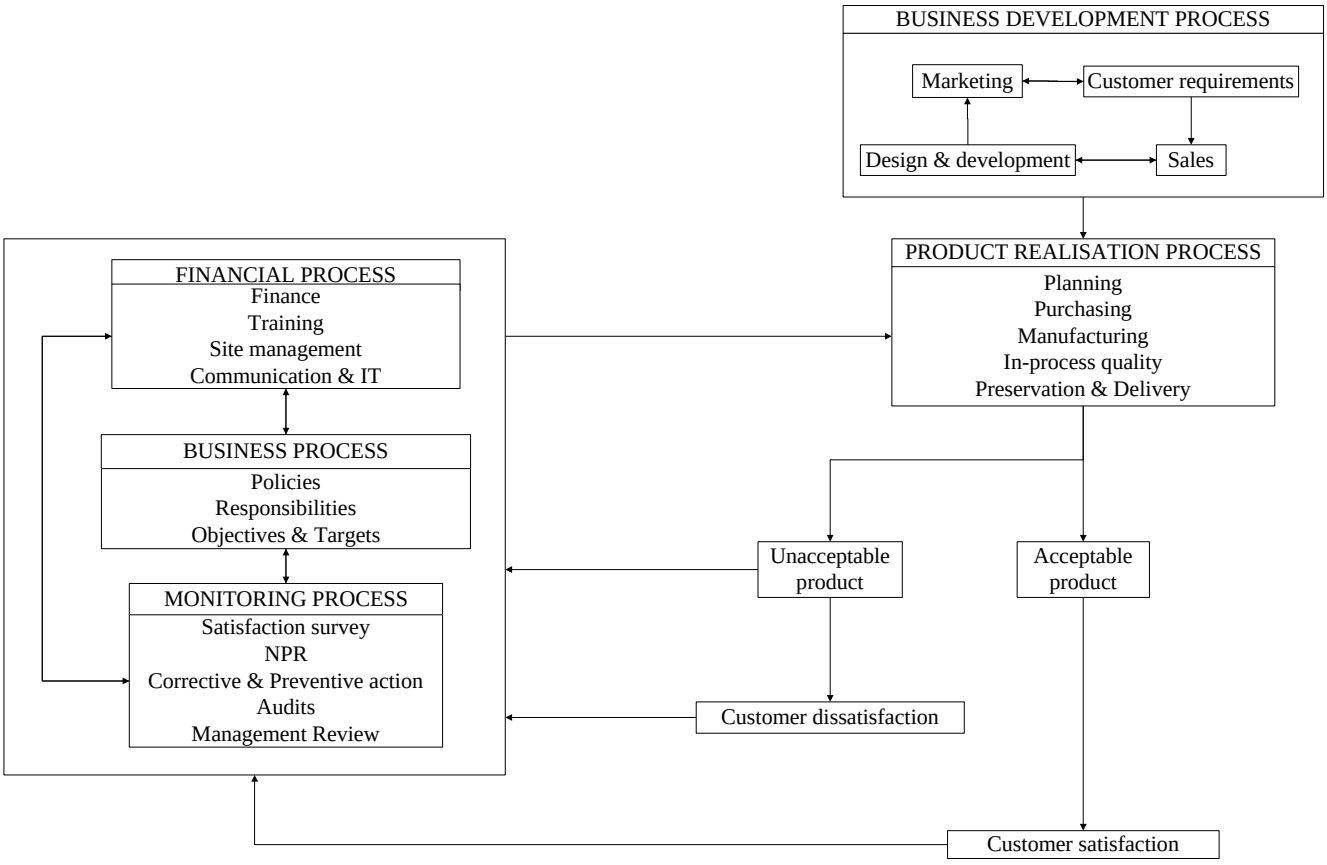
.19 Employees are expected not to intentionally or recklessly interfere with or misuse any work equipment provided as this may compromise the health and safety of themselves or their colleagues or adversely affect the quality of the product or increase environment impact.

.20 It is the responsibility of employees to wear any protective equipment provided and to use any safety equipment relating to a particular job.

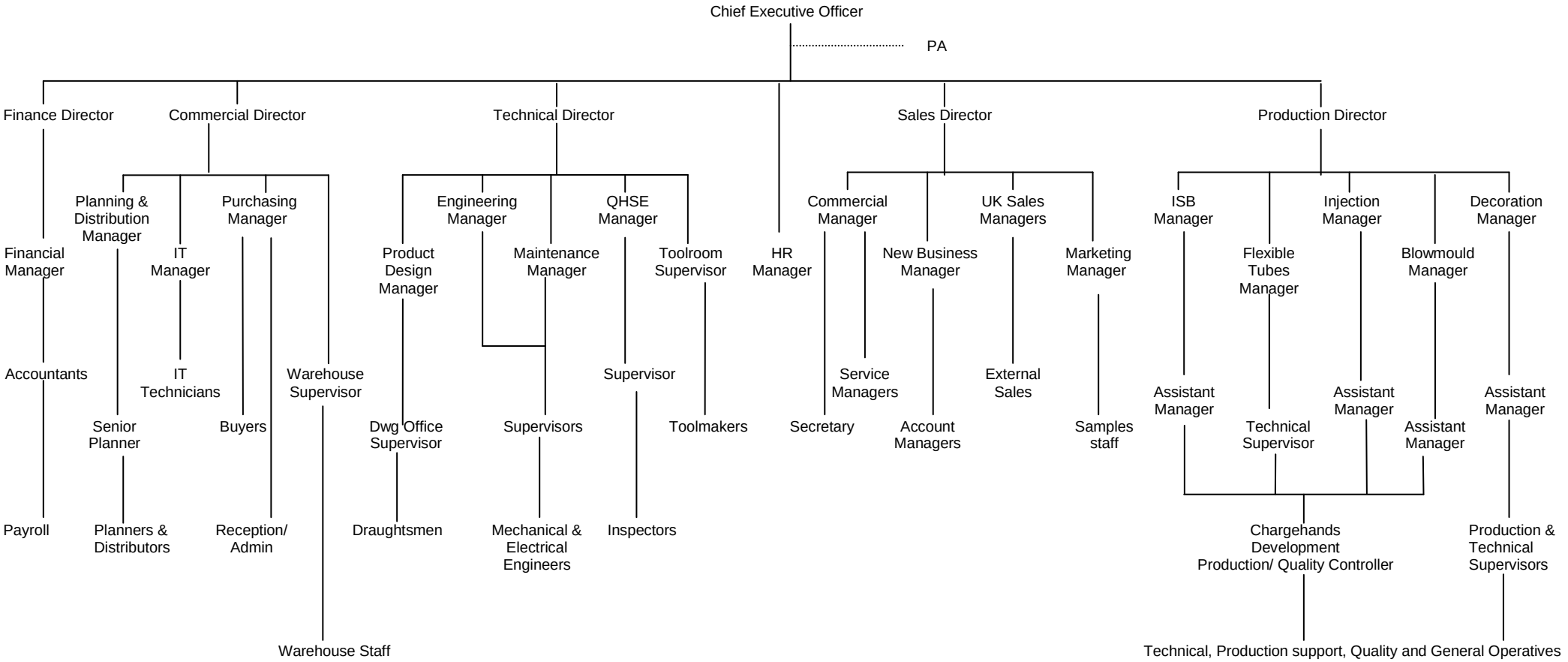
.21 Fire and Emergency procedures exist and signs and guidance notes are displayed around the Company. It is the responsibility of every employee to ensure that they are conversant with them and to report any concerns or confusions to their Supervisor.

.22 Employees are responsible for voicing any concerns regarding, or suggestions to improve, the quality of the product, the environmental management system or the health and safety of the employees.

7 PROCESS INTERACTION AND ORGANISATION



Organisation



8 MANAGEMENT REVIEW

.1 The Executive Board of Directors shall review the IMS at intervals defined in Operating Procedure IMS 1.

.2 The Directors will use the results of internal and external audits, non-conformances and any other relevant information to evaluate the Company's compliance with the international quality, and environmental standards as well as the health and safety system standard.

.3 The results of the Management Review are recorded and distributed appropriately.

.4 In addition to the annual system evaluation, a monthly appraisal of non-conformances is performed by Senior Management, under the control of the Logistics Director. The results are circulated accordingly.

.5 If there are any actions determined during a Management Review, they are acted upon within a time scale determined by the review body.

9 TARGETS AND OBJECTIVES

.1 An IMS Management Programme exists to generate objectives and targets. A panel of staff including, and chaired by, the Production Director establishes the objectives and associated targets.

.2 Qualitative quality objectives are established and in the IMS Management Programme.

.3 Qualitative environmental objectives are established and published in the IMS Management Programme.

.4 Qualitative health and safety objectives are established and published in the IMS Management Programme.

.5 All aspects are considered, including financial implications and practical feasibility, to ensure that beneficial objectives are established and appropriately planned to ensure they are achievable.

.6 Where appropriate, objectives and targets shall include methods, responsibilities and personnel necessary to achieve them.

.7 Quantitative targets are generated from the objectives and specified in the IMS Management Programme, which is retained in the QA Department.

.8 All targets include a time-scale for completion

10 PREVENTATIVE ACTION

.1 Requests for components that require new tooling or partial new tooling are processed by the Sales Department, who initiate a development cycle in accordance with the appropriate new product development work instruction.

.2 If a request is made for a product or process that differs from existing products or processes, Senior Management reviews it. Management will ensure that it is within the capabilities of the Company to produce the components at an acceptable quality, that there is no increased risk to the health and safety of the employees and there will be no significant adverse effect upon the environment. If there is a quality, environmental or health and safety issue with the new product, Senior Management will either reject the proposal or take the necessary steps to successfully manufacture the product. Product will be manufactured to the desired standard and with acceptable levels of risk to the environment and to the health and safety of the staff.

.3 Quotations for new tooling are based upon the interpretation of information received by the Sales Department from the customer, which is passed to the relevant development or manufacturing department for assessment.

.4 Development cycles begin with an initial design and finish with components that are approved by the customer. An accurate drawing is maintained for all tooling specifications.

.5 The individual development cycles are structured in such a way as to anticipate, identify and prevent any potential problems from occurring.

.6 New tooling for mouldings is developed against a specification, which is contained within the component drawing, and where possible in conjunction with any associated component(s).

.7 Performance testing is carried out on all new components before submission for approval.

.8 The customer approves new components manufactured from “custom” tooling, before production can commence. The Production Director or Technical Director approve new M&H Plastics standard components before production commences.

11 CUSTOMER RELATED PROCESSES

.1 Orders received for existing components shall be reviewed in accordance with Operating Procedure IMS 5, Contract Review, to ensure that;

a) the requirements are adequately defined, documented and confirmed.

b) any differences between the quotation and the order are resolved and confirmed by an order acknowledgement.

c) delivery dates can be met.

.2 The responsibility for the contract review rests with the account handler in the Sales Department and the orders are acknowledged to the customer in writing.

.3 Any amendments to orders are acknowledged to the customer in writing.

.4 Orders for new products are processed in accordance with Operating Procedure IMS 6, New Product Development.

.5 Customer satisfaction is assessed and monitored within the sales department. Customer surveys are conducted and the results analysed and acted upon where appropriate.

12 CONTROL OF DOCUMENTS

.1 All documentation pertaining to the quality, environmental and health and safety systems is controlled in accordance with Operating Procedure IMS 2, Document and Data Control.

.2 Controlled documents consist of the following;

First level documentation:	IMS Manual
Second level documentation:	Operating Procedures
Third level documentation:	Work Instructions
Fourth level documentation:	Forms, registers and single issue documents

.3 The distribution of first, second and third level documents, is made in accordance with the distribution register held in the QA Department.

.4 The issue and amendment of first, second and third level documents is accompanied by a Revised Document Issue Form, which details the reason for issue or change. When amendments to these documents is required, the entire document is re-issued and a new issue number and date of issue is stated on the front page.

.5 All amendments to fourth level documents are indicated on the new issue.

.6 The holders of documents are responsible for their replacement with new issues and disposal of old issues.

13 PURCHASING

.1 The procurement of all products is performed in accordance with Operating Procedure IMS 4, Purchasing and Free-Issue.

.2 Consideration is given to the affect the procured product will have upon our product quality, the environment and the health and safety of the work force.

.3 Suppliers are used of the basis of one or more of the following factors;

a) Their recorded performance history.

b) The availability of material of the required type

c) An assay of the incoming goods.

d) An evaluation of the supplier and their operating systems.

.4 An approved list of suppliers for products and services that have a direct effect upon product quality is maintained in the Purchasing Department.

.5 Free-issue materiel is inspected upon receipt in accordance with Operating Procedure QA 2, Receiving Inspection, and thereafter regarded as purchased product.

.6 Rejections of free-issue goods is made in accordance with Operating Procedure IMS 11, Non-conformance.

14 IDENTIFICATION AND TRACEABILITY

.1 Raw materials, finished and part-finished product is identified as detailed in the matrix that forms part of Operating Procedure QA 4, Identification and Traceability.

.2 All identification is performed in a manner that is both unambiguous and that prevents accidental loss of the identification.

.3 Identification may take the form of printed labels, hand written labels or positioning within designated areas.

.4 To aid traceability, all production, testing and final release documentation shall reference the M&H Plastics product specification as a minimum.

15 PRODUCTION AND SERVICE PROVISION

.1 Operating Procedure IMS 9, Process Control, exists to identify and control the processes that affect quality and incorporate any safety, health and environmental factors.

.2 Where necessary, detailed Work Instructions are created for specific processes that require clarification beyond procedural outlining. Work instructions also exist to ensure that the fabric of the buildings and the operating conditions within them is appropriate to achieve optimum quality products in a suitable local environment at minimal risk to health and safety.

.3 Where appropriate, operating procedures and work instructions will specify the staff designated to perform the tasks.

.4 Operating procedures and work instructions will specify any necessary equipment to perform a given task and ensure it is within calibration if appropriate.

.5 If required, standards of workmanship are detailed within operating procedures and associated work instruction(s).

.6 Operating procedures and work instructions are designed to encompass normal and, if relevant, abnormal situations. Where necessary, emergency procedures exist to form a response to the potential consequences of abnormal situations.

.7 To ensure that the optimum performance and maximum efficiency is achieved, machinery that requires regular maintenance is maintained in accordance with an associated schedule.

.8 There are no special services that form part of the M&H operation.

16 INSPECTION AND TESTING

.1 Inspection and testing of products during production is performed in accordance with a pre-determined inspection plan that either forms part of the machine log or is an associated inspection sheet.

.2 Inspection and testing stages are determined for each product type by Senior Management. Where necessary products are 100% inspected. Post-production inspection is performed on all products. The results of post-production sampling are compared against either the ISO 2859 (BS6001) standard or M&H Plastics' own sampling plans.

.3 All products are classified into one of the existing inspection level categories when the component specification is created. Components can be re-classified at any time in response to changes in circumstance.

.4 The inspection of equipment or processes that affect the environment or the health and safety of the employees is performed in accordance with schedules or in response to individual incidents.

.5 Purchased products that have a direct effect upon product quality are inspected upon receipt, in accordance with Operating Procedure QA 2, Receiving Inspection.

.6 The release of products for despatch is only permitted after the successful completion of all inspection stages and the product is appropriately packaged and identified.

.7 In the event of a batch of either manufactured-on-site components or bought-in products failing to achieve the acceptance criteria, the product is rejected in accordance with Operating Procedure IMS 11, Non-Conformance.

17 CONTROL OF MONITORING AND MEASURING DEVICES

.1 All equipment that is used for measuring and testing is calibrated, unless its operation does not have an effect upon product quality, environmental impact or health and safety.

.2 All measuring and test equipment that is calibrated carries a unique identification mark and an up to date calibration sticker.

.3 Non calibrated equipment is indicated as such, where there is the risk of confusion.

.4 All calibrations are traceable to a national standard.

.5 Measuring and test equipment is obtained on a fit for purpose basis, taking into account the amount of use, skill of operator and required durability, thus minimising the risk of equipment operating outside its specified accuracy tolerance between calibrations.

.6 Records are maintained for all equipment that requires calibration, which detail the method, periodicity, tolerance and performance history.

.7 Calibrations are performed in-house wherever possible. External bodies are used where necessary and the same criteria are applied to externally calibrated equipment as for internally calibrated equipment.

18 INSPECTION AND TEST STATUS

.1 Incoming goods are inspected upon receipt and their status can be determined either by an identification label or by physical location.

.2 The inspection status of in-process components can be determined from the identification matrix that forms part of Operating Procedure QA 5, Inspection and Test Status.

.3 The inspection status of finished components can also be determined from the matrix that forms part of Operating Procedure QA 5, Inspection and Test Status.

.4 In-process inspections are recorded on the associated machine logs or on an accompanying inspection sheet.

.5 Post-production inspections are either recorded on appropriate inspection sheets or by an indication on the box, as detailed in Operating Procedure QA 5, Inspection and Test Status.

.6 Products that fail inspection stages are identified by a Non-conforming Product (NPR) label and will where possible be separated from other product.

19 NON-CONFORMANCE

.1 In the event of product failing to conform to its specification, an incident that is detrimental to the environment, health or safety of personnel, or a systematic failure to conform to the requirements of the IMS, the occurrence will be recorded and investigated.

.2 Non-conforming Product Reports (NPR's) are generated in accordance with Operating Procedure IMS 11, Non-Conformance, for product and materials that may fail to satisfy the requirements of the customer. The details are entered into a register.

.3 All product associated with an NPR is identified with an NPR label and where possible separated from other product.

.4 Environmental non-conformances are recorded on an Environmental Non-conformity Report and the details entered into a register.

.5 Health and safety incidents are recorded on an Accident, Near miss and Reportable Disease Form and the details entered into a register.

.6 Where appropriate, remedial action is determined by the Production Director to rectify the non-conformance.

.7 Upon completion of the remedial action, a preventative action that is intended to prevent recurrence wherever possible is determined by the Departmental Manager responsible for the error where possible.

.8 A review of NPRs is performed monthly by the Directors and a review of all other non-conformances forms part of the annual management review.

.9 Systematic failures are identified through the audit process performed by M&H Plastics personnel, external agencies and by customers. An Audit Corrective Action Report (ACAR) is generated to instigate a remedial or corrective action and initiate a preventative action wherever possible.

.10 Continual monitoring of rejections is performed by the Quality Assurance Department, and graphical publications of trends are published to all departments.

20 CORRECTIVE ACTION

.1 Corrective actions are generated for non-conformances wherever possible, in accordance with Operating Procedure IMS 7, Corrective Action.

.2 All non-conformances are considered for a possible corrective action that is intended to prevent recurrence of the non-conformance.

.3 Corrective actions are monitored to establish their effectiveness on the process or activity in question by an investigation performed at an appropriate interval after the corrective action has been implemented.

.4 Corrective actions form part of the Non-conformance Report and therefore remain an integral part of the initial observation.

.5 The results of an investigation into the success of a corrective action are also recorded on the Non-conformance Report.

21 PRESERVATION OF PRODUCT

.1 A system is operated in accordance with Operating Procedure IMS 10, Handling, Storage, Packaging, Preservation and Delivery, which is intended to provide reasonable protection for the product, the environment and the health and safety of the employees, from the first stages of manufacture through to delivery to the customer.

.2 Delivered materials, in-process products, and finished products are handled in a manner appropriate to maintain their suitability for purpose.

.3 As well as protecting the product, the methods of handling are intended to ensure that neither the health of the operator nor the environment is at risk.

.4 All products are stored under cover to protect them from the elements. Substances with a potential danger to the environment are stored in bunded areas or under other suitable confinement. Storage of products is mindful of the potential risks to personnel from falling objects, moving parts and harmful energies.

.5 All finished product is packaged in plastic bags, inside a cardboard box, on a pallet and the pallet is stretchwrapped.

.6 If necessary, products that can deteriorate under storage, be they raw materials or finished products, are stored in a manner that maximises the preservation.

.7 Stored products are identified appropriately. Finished product is identified with type, customer, date and product code as a minimum.

.8 The packaging for finished products is designed to provide continuous protection for the product inside. It is however the responsibility of the warehouse staff to identify any deficient packaging they may encounter.

.9 Only approved hauliers are used in the transportation of finished goods.

22 CONTROL OF RECORDS

.1 Records pertaining to the IMS are controlled in accordance with Operating Procedure IMS 12, Records.

.2 As a minimum, all records that have a direct bearing upon the product or help to demonstrate legal compliance are retained for not less than 2 years.

.3 All records are stored in a suitable manner that enables ease of retrieval appropriate to the frequency of use.

.4 All records are stored in conditions that prevent deterioration through environmental damage during the anticipated period of storage.

.5 All records will have as a minimum: a recorded date, an appropriate identification of the product or customer, a copy list and an issue status if the record is subject to updating.

23 AUDITS

.1 All areas and activities covered in the IMS are audited to verify compliance with the relevant standards and associated operating procedures.

.2 Audits are carried out where possible by personnel independent of the area being audited, in accordance with Operating Procedure IMS 13, Audits.

.3 Audit checklists are generated for all areas to be audited and these are used as the basis of the audit. Each area is audited once per year as a minimum.

.4 The Production Director reviews the results of audits and copies are distributed if appropriate.

.5 Any non-conformances discovered during an audit are recorded on an Audit Corrective Action Request (ACAR) which is forwarded to the Departmental Head. Failure to act upon the ACAR is referred to the Production Director.

.6 Audit frequencies are determined by the Production Director.

.7 The audit system encompasses both internal and external audits.

.8 The audit system is reviewed as part of the Management Review process.

24 COMPETENCE, AWARENESS AND TRAINING

.1 Training is conducted in accordance with Operating Procedure IMS 8, Training, to ensure that staff exceed the minimum requirements that enable them to perform their duties correctly, safely and without risk to the environment.

.2 Where necessary, training manuals are produced for individual staff or departments and training is conducted in accordance with the manuals.

.3 Staff that conduct training are themselves sufficiently experienced and/or trained to be able to effectively instruct M&H Plastics personnel. Where appropriate, external bodies will be used to provide specialist training.

.4 Assigning the trainee to an experienced member of staff can provide training not conducted in accordance with a training manual.

.5 All staff are made aware of their responsibilities towards health, safety and environmental issues when their employment with M&H Plastics begins.

25 MONITORING AND MEASUREMENT

.1 Any statistical techniques employed at M&H Plastics are detailed in Operating Procedure QA 6, Statistical Techniques.

.2 Statistical sampling is utilised for all finished products and for incoming goods. Post Production Quality Checks (PPQC) and Acceptable Quality Levels (AQL) are the sampling techniques employed at M&H Plastics.

.3 M&H Plastics anticipate that all product leaving the Company will achieve the following Acceptable Quality Levels based on the criteria of ISO 2859;

0.65 For critical rejects

1.0 For major rejects

4.0 For minor rejects

.4 Failure to meet the requirements of the sampling plans results in a non-conformance in accordance with Operating Procedure IMS 11, Non-Conformance.

.5 Servicing is not an activity that is currently undertaken at M&H Plastics.

26 LEGISLATIVE AND REGULATORY REQUIREMENTS

.1 The Company identifies and conforms to, all applicable legislation, in accordance with Operating Procedure IMS 3, Legislative and Regulatory Requirements.

.2 A register of applicable legislation and regulatory requirements is maintained and updated with the assistance of external publications.

.3 The Company retains copies of all current legislation where they are required for continual conformance.

.4 Conformance with applicable legislation and regulatory requirements is monitored as part of the audit system.

.5 Internal and external communications are controlled in accordance with Operating Procedure IMS 3, Legislative and Regulatory Requirements.

27 ENVIRONMENTAL EFFECTS

.1 The Company identifies both its direct and indirect effects upon the environment and determines which can be considered to be significant, in accordance with Operating Procedure EMS 3, Environmental Effects.

.2 A register of significant environmental effects is maintained.

.3 Environmental effects are considered for both normal and abnormal operating conditions and are used as the basis for establishing environmental objectives. If necessary, past activities are considered as well as present activities.

.4 The environmental effects are also used to identify potential situations that require an emergency plan to minimise the environmental impact in the event of an accident.

.5 Environmental effects are considered, as part of the annual management review, to ensure that the classifications remain accurate.

28 RISK ASSESSMENTS

.1 Risk assessments are performed on all machinery and for all operations within the Company.

.2 Staff responsible for the area in which the activity is performed, perform activity risk assessments and a qualitative evaluation is determined and recorded.

.3 Staff responsible for the area in which the machinery is used, perform machinery risk assessments and a quantitative evaluation is determined and recorded.

.4 Copies of all relevant risk assessments are retained in the each department and are updated when working practices or machinery changes.

.5 A new risk assessment is performed when an activity changes, an item of machinery is modified or new machinery is introduced. If there is no change, risk assessments are re-assessed a minimum of every three years.