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4.0 CONTEXT OF SFPL

4.1 Understanding SFPL and its Context

Sriram Foams Pvt. Ltd., Hereinafter referred as "SFPL" has determined external and internal issues that are relevant to its purpose and its strategic direction and that affect its ability to achieve the intended result(s) of its integrated Quality, Health, Safety and Environment management system. SFPL monitors and reviews information about these external and internal issues.

Reference: Annex 1 – SWOT Analysis, Annex 2 – PESTEL Analysis, Annex 3 – Business Plan

4.2 Understanding the Needs and Expectations of Interested Parties

Potential effect on SFPL 's ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements, SFPL determined:

- a) The interested parties in addition to workers, that relevant to the integrated Quality, Health, Safety and Environment management system;
- b) The requirements of these interested parties that are relevant to the integrated Quality, Health, Safety and Environment management system.
- c) which of these needs and expectations are, or could become, legal requirements and other requirements.

SFPL monitors and reviews the information about these interested parties and their relevant requirements. Any changes in external and internal issues that are relevant to the integrated Quality, Health, Safety and Environment management system, the input will be reviewed by top management of SFPL as it required by clause 9.3 Management Review of this integrated Quality, Health, Safety and Environment Management System Manual

(Reference: RM-001 - List of Internal and External Issues and Risk assessment of SFPL)

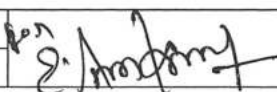

4.3 Determining the Scope of the Integrated Quality, Health, Safety and Environment Management System


SFPL has determined the boundaries and applicability of the Integrated Quality, Health, Safety and Environment management system to establish its scope. When determining this scope, SFPL considered:

- a) The external and internal issues referred to in 4.1;
- b) The requirements of relevant interested parties referred to in 4.2;
- c) The products and services of SFPL .
- d) take into account the planned or performed work-related activities.

SFPL applies all the requirements of this International Standard if they are applicable within the determined scope of its integrated Quality, Health, Safety and Environment management system.

The scope of SFPL's integrated Quality, Health, Safety and Environment management system is available and maintained as documented information. The scope states the types of products and services covered, and provide justification for any requirements that SFPL has determined is not applicable to the scope of its integrated Quality, Health, Safety and Environment management system.

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IMS Coordinator		Managing Director	

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Conformity to ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 are only claimed if the requirements determined as not being applicable do not affect SFPL's ability to ensure the conformity of its product and services and the enhancement of customer satisfaction.

Scope of Registration

The Scope associated with SFPL activities and registration is:

“DESIGN, MANUFACTURE AND SUPPLY OF POLYURETHANE PRODUCTS”

To run our activities at below site address;

SRIRAM FOAMS PVT. LTD.,
Factory Address
G/46-1, Vallam Vadagal Sipcot,
Sriperumbudur Taluk, Kanchipuram District – 602105
Tamilnadu, India

By stating the above mentioned scope, justification is also being provided to determine any requirement of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.

SFPL confirmed that the following elements are not applicable and does not affect SFPL's ability or responsibility to ensure the conformity of its products and services and the enhancement of customer satisfaction;

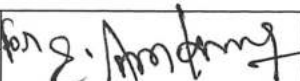

This Manual provides SFPL personnel and customers with a general description of our integrated Quality, Health, Safety and Environment Management System, which has been planned and developed to assure conformance to customer needs. Written procedures for supplementing the system described herein will be established and maintained.

Applicable & Justification:-

Nil

4.4 Integrated Quality, Health, Safety and Environment Management System and determined processes.

The top management of SFPL has established, implemented, maintained and will continually improve Integrated Quality, Health, Safety and Environment management system, including the processes needed and their interactions, in accordance with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. SFPL has determined the processes needed for the Integrated Quality, Health, Safety and Environment management system and its application throughout the SFPL as follows:

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- determined inputs required and the outputs expected from the processes; determined sequence and interaction of the processes;
(Reference: Business Process Interaction Matrix–Annexure 1)
- determine and apply the criteria and methods Reference: Determination of process is through Integrated Quality, Health, Safety and Environment Manual;
 - Clause 8.1 Operational Planning,
 - Clause 8.2. Requirement for products and services, and
 - Clause 8.4 Control of externally provided processes, products and services
 - Application of process is demonstrated by clause 8.5 Production and service provision
- monitoring, measurements and related performance indicators needed to ensure the effective operation and control of these processes; (Reference: KPI Monitoring - Application of this will follow as per clause 6.2 Integrated Quality, Health, Safety and Environment Objective of this Integrated Quality, Health, Safety and Environment Manual)
- determine the resources needed for these processes and ensure their availability (Refer to clause 7.1 Resource of this Integrated Quality, Health, Safety and Environment Manual)
- assign the responsibilities and authorities for these processes
(Refer to clause 5.3 Organizational Roles, Responsibility and Authorities)
- address the risks and opportunities as determined in accordance with the requirements of 6.1 of the standard Refer to Risk analysis document (Application of this will follow as per clause 6.1 Risk management of this Integrated Quality, Health, Safety and Environment Manual)
- evaluate these processes and implement any changes needed to ensure that these processes achieve their intended results; Refer to
 - Internal audit procedure
 - Risk management procedure and,
 - Management review (as defined in clause 9.3 Management review of this Integrated Quality, Health, Safety and Environment Manual) where applicable, the change needed will follow according to Documented information control procedure.
- Improve the processes and the Integrated Quality, Health, Safety and Environment management system. Refer to;
 - KPI monitoring,
 - Corrective action procedure, and,
 - Management review (as defined in clause 9.3 Management review of this Integrated Quality, Health, Safety and Environment Manual)

All abovementioned documented information will be maintained and controlled through documented information control procedure. (Reference: Process Flow-Annex A and Business Process Interaction Matrix – Annex- B).

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The processes covered include:

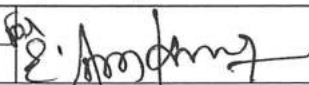

1. Top Management
2. Internal Audit and Control of Documented Information
3. Sales and Marketing
4. New Product Development
5. Production
6. Quality Assurance
7. Plant and Mold Maintenance
8. Purchase
9. Stores
10. Packing and Dispatch
11. HR and Administration
12. Corrective Action and Continual Improvement

5.1 Leadership and Commitment

5.1.1 General

Top management demonstrates leadership and commitment with respect to the Integrated Quality, Health, Safety and Environment management system by:

- a) Taking accountability for the effectiveness of the Integrated Quality, Health, Safety and Environment management system; taking overall responsibility and accountability for the prevention of work-related injury and ill
- b) Ensuring that the policy and objectives of Integrated Quality, Health, Safety and Environment policy are established and are compatible with the context and strategic direction of SFPL ;
- c) Ensuring the integration of the Integrated Quality, Health, Safety and Environment management system requirements into SFPL's business process;
- d) Promoting the use of the process approach and risk-based thinking;
- e) Ensuring that the resources needed for the Integrated Quality, Health, Safety and Environment management system are available;
- f) Communicating the importance of effective Integrated Quality, Health, Safety and Environment management and of conforming to the Integrated Quality, Health, Safety and Environment management system requirements;
- g) Ensuring that the Integrated Quality, Health, Safety and Environment management system achieves its intended results;
- h) Engaging, directing and supporting persons to contribute to the effectiveness of the Integrated Quality, Health, Safety and Environment management system;
- i) Promoting improvement; and
- j) Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

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Reference: Roles, Responsibility, Authority - Annex- 6

5.1.2 Customer Focus (QMS)

Top management demonstrates leadership and commitment with respect to customer focus by ensuring that:

- a) Customer and applicable statutory and regulatory requirements are determined, understood and consistently met;
(Customer requirements - Refer clause 8.2. Requirement for products and services of this Integrated Quality, Health, Safety and Environment Manual)
(SFPL /HSE/002 - Legal & Other Requirements and Legal register list and evaluation – SFPL /LEG/L/01)
- b) The risks and opportunities that can affect conformity of products and services and the ability to enhance customer satisfaction are determined and addressed; and (Reference: Procedure for Risk Management Procedure – SFPL /MOP/001, Risk analysis document – SFPL /RM/001)
- c) The focus on enhancing customer satisfaction is maintained. (Reference: Clause 9.1.2 Customer satisfaction of this Integrated Quality, Health, Safety and Environment Manual)

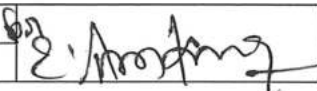

Reference:

Processes for determination of customer requirements, review of the same before acceptance of contract and communication to customer has been established as detailed in system procedure – SFPL /COP/001 - Sales & Marketing and SFPL /HSE/002 - Legal & Other Requirements and Legal register list and evaluation – SFPL /LEG/L/01

5.2 Integrated Quality, Health, Safety and Environment Policy

Top management of SFPL established, implemented and maintained a Integrated Quality, Health, Safety and Environment policy that:

1. is appropriate to the purpose and context of SFPL and supports its strategic direction, including nature, scale and environmental impacts of its activities, products and services and also including a commitment to provide safe and healthy working conditions for the prevention of work related injury and ill health
2. provides a framework for setting Integrated Quality, Health, Safety and Environment objectives
3. includes a commitment to satisfy applicable requirements (Compliance obligation - Legal & Other Requirements)
4. includes a commitment to continual improvement of the Integrated Quality, Health, Safety and Environment management system performance and to satisfy applicable requirements, protection of the environment, including prevention of pollution, prevention of injury and ill health and others specific to the context of SFPL
5. includes a commitment to eliminate hazards and reduce OH&S risks;
6. includes a commitment to continual improvement of the OH&S management system;
7. includes a commitment to consultation and participation of workers, and, where they exist,
8. Workers' representatives.

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The Integrated Quality, Health, Safety & Environment Policy statement of SFPL ;(Reference: IMS Policy)

This integrated Quality, Health, Safety and Environment policy will be:

1. maintained as documented information; and controlled through clause reference 7.5 of ISO 9001:2015, ISO14001:2015,ISO 45001:2018of this Integrated Quality, Health, Safety and Environment Manual
2. communicated, understood and applied within SFPL ; through clause reference 7.3 Awareness of ISO 9001:2015, ISO14001:2015,ISO 45001:2018 of this Integrated Quality, Health, Safety and Environment Manual
3. Available to relevant interested parties, as appropriate.

5.3 Organizational Roles, Responsibility and Authorities

Top management of SFPL will ensure that the responsibilities and authorities for relevant roles are assigned, communicated and understood within SFPL . Top management of SFPL will assign the responsibility and authority for executing the below tasks:

Responsibility	How to achieve?
ensuring that the Integrated Quality, Health, Safety and Environment management system conforms to the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018Standard	1. Internal Audit (refer to clause 9.2 Internal Audit of this Integrated Quality, Health, Safety and Environment Manual and 2. Management review as per clause 9.3 Management review of this Integrated Quality, Health, Safety and Environment Manual and Awareness of every staff through clause 7.3 Awareness of this Integrated Quality, Health, Safety and Environment Manual
ensuring that the processes are delivering their intended outputs;	1. Business Process Mapping, 2. Clause 8.5.1 Production control of this Integrated Quality, Health, Safety and Environment Manual
Reporting on the performance of the Integrated Quality, Health, Safety and Environment management system	Refer to KPI, management review
Reporting on opportunities for improvement (see 10.1), in particular to top management of SFPL	Refer to Integrated Quality, Health, Safety and Environment Manual 1. Clause 10.2 Nonconformity and corrective action, and 2. Clause 10.3 Continual Improvement
ensuring the promotion of customer focus throughout SFPL	Refer to Integrated Quality, Health, Safety and Environment Manual; 1. Clause 5.1 General responsibilities; 2. Clause 7.3 Awareness
ensuring that the integrity of the Integrated Quality,	According to documented information control

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Responsibility	How to achieve?
Health, Safety and Environment management system is maintained when changes to the Integrated Quality, Health, Safety and Environment management system are planned and implemented	procedure

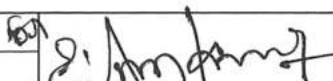

Reference: Annex C-Organization Chart, Annex- 6- Roles, Responsibility, Authority

5.4 Consultation and participation of workers (As per ISO 45001:2018)

SFPL has established, implemented and maintained process for consultation and participation of workers at all applicable levels and functions, and, where they exist, workers' representatives, in the development, planning, implementation, performance evaluation and actions for improvement of the OH&S management system. SFPL will:

- a) provide mechanisms, time, training and resources necessary for consultation and participation;
- b) provide timely access to clear, understandable and relevant information about the OH&S management system;
- c) determine and remove obstacles or barriers to participation and minimize those that cannot be removed;
- d) emphasize the consultation of non-managerial workers on the following:
 - 1) determining the needs and expectations of interested parties ;
 - 2) establishing the OH&S policy covered in IMS Policy;
 - 3) assigning organizational roles, responsibilities and authorities, as applicable;
 - 4) determining how to fulfil legal requirements and other requirements;
 - 5) establishing OH&S objectives and planning to achieve them;
 - 6) determining applicable controls for outsourcing, procurement and contractors;
 - 7) determining what needs to be monitored, measured and evaluated;
 - 8) planning, establishing, implementing and maintaining an audit programme(s);
 - 9) ensuring continual improvement;
- e) emphasize the participation of non-managerial workers in the following:
 - 1) determining the mechanisms for their consultation and participation;
 - 2) identifying hazards and assessing risks and opportunities;
 - 3) determining actions to eliminate hazards and reduce OH&S risks;
 - 4) determining competence requirements, training needs, training and evaluating training;
 - 5) determining what needs to be communicated and how this will be done;
 - 6) determining control measures and their effective implementation and use;
 - 7) investigating incidents and nonconformities and determining corrective actions.

Reference: Procedure - SFPL/HSE/006 – Consultation and Participation of workers

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6.1 Actions to address Risks and Opportunities

6.1.1 General

When planning for the QMS, EMS & OH&S, SFPL had considered the issues addressed in clause 4.1 of the standard and the requirements addressed and in clause 4.2 of the standard. This also in line with the aspect described in clause 4.1 Understanding the context of the SFPL of this Integrated Quality, Health, Safety and Environment Manual for SFPL where the internal and external issues will be addressed.

Therefore, determination to the risks and opportunities is needed to:

1. give assurance that the Integrated Quality, Health, Safety and Environment management system can achieve its intended result(s);
2. enhance desirable effects;
3. prevent, or reduce, undesired effects;
4. achieve improvement.
5. Environmental aspects (EMS 6.1.2) and Occupational Hazards (OH&S-6.1.2.1)
6. OH&S Risks and Other Risks – (OH&S-6.1.2.2)
7. Compliance obligations (EMS& OH&S 6.1.3); and
8. Other issues and requirements identified in 4.1 and 4.2'

The planning of risk management has concerned on the following aspects;

- a) actions to address these risks and opportunities;
- b) how to:
 - 1) integrate and implement the actions into its QMS (according to 4.4 of the standard), and
 - 2) evaluate the effectiveness of the actions taken. (See clause 9.2.1 and 9.3.1 of the standard)

That need to be addressed to:

- give assurance that the QMS, EMS & OH&S can achieve its intended outcomes;
- prevent, or reduce, undesired effects, including the potential for external environment conditions to affect SFPL ; and to - achieve continual improvement.

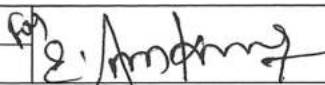

Within the scope of the QMS, EMS & OH&S, the Department will determine potential emergency situations, including those that can have an environmental impact.

The Department will maintain documented information of: risks and opportunities that need to be addressed; and processed needed in 6.1.1 and 6.1.4, to the extent necessary to have confidence they are carried out as planned.

Actions taken to address risks and opportunities will be proportionate to the potential impact on the conformity of products and services. In the context of SFPL , risk management will be taking into account on the following aspects.

1. Applicable legal compliance
2. Working environment (See 7.1.4 Environment for the operation of processes of this manual)

Reference: Risk management procedure, Risk analysis document

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In conformance with clause 4.4, Integrated Quality, Health, Safety and Environment Management System and determined processes of this Integrated Quality, Health, Safety and Environment Manual, documented information of risk management will be established, implemented and maintained. The requirement of documented information control procedure is followed. The effectiveness of actions taken to address risks and opportunities will be reviewed by top management of SFPL as it required by clause 9.3 Management Review of this Integrated Quality, Health, Safety and Environment Manual SFPL will include in its risk analysis, at a minimum, lessons learned from product recalls, product audits, field returns and repairs, complaints, scrap, and rework. SFPL will retain documented information as evidence of the results of risk analysis.

Reference: Procedure - SFPL/MOP/001 - Risk Management

6.1.2 Environmental aspect and Hazard Identification (As per ISO 14001 Cl. Ref 6.1.2 and as per ISO 45001:2018 Cl. Ref 6.1.2.1)

Within the defined scope of the EMS, SFPL will determine the environmental aspects of activities, products and services that it can control and those that it can influence, and their associated environmental impacts, considering life cycle perspective. SFPL will

1. Change, including planned or new developments or new or modified activities, products and services; and
2. Abnormal situations and reasonable foreseeable emergency situations.

SFPL will determine those aspects that have or can have significant environmental impact by establishing criteria. SFPL will communicate its significant environmental aspect among the various levels and functions of the Department.

SFPL will maintain documented information of its:

- environmental aspects associated environmental impacts;
- criteria used to determine significant environmental aspects; and
- Significant environment aspects.

SFPL has established, implemented and maintained a procedure for on-going identification of, for defined scope:-

- Environmental aspects and evaluation of impacts (activities, products and services that SFPL can control and influence for planned or new development, new or modified activities, products and services).
- Identification of hazards, risk assessment and determining control measures to reduce the risks level.
- These results will be considered during the setting of HSE objectives and target.
- The aspect /hazards identification and impact/risks assessment will be:
- Routine and non-routine (normal, abnormal and emergencies) activities.
- Activities of all persons having access to the workplace (including contractors and visitors).
- Human behavior, capabilities and other human factors.

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- Identified hazards originating outside the workplace capable of adversely affecting the HSE of persons under the control of SFPL within the workplace.
- Hazards created in the vicinity of the workplace by work-related activities under our control.
- Infrastructure, equipment and materials at the workplace, whether provided by SFPL or others.
- Changes or proposed changes in SFPL, its activities, or materials.
- Modifications to the IMS, including temporary changes, and their impacts on operations, processes, and activities
- Any applicable legal obligations relating to risk assessment and
- The design of work areas, processes, installations, machinery/equipment,
- operating procedures and work organization, including their adaptation to human capabilities.

The methodology for hazard identification and risk assessment will:

- Be defined with respect to its scope, nature and timing to ensure it is pro-active rather than reactive; and
- Provide for the identification, prioritization and documentation of risks and the application of controls.

The significant level of HSE impacts and risks are determined by the evaluation based on the three factors:

- Likelihood
- Severity
- Legal requirements and other requirements.

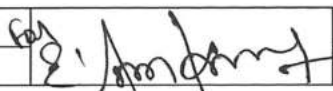

Anything falling requiring legal consideration will be considered as significant to ensure that the activity is carried out under controlled conditions.


SFPL will ensure that the results of these assessments are considered when determining controls. When determining controls, or considering changes to existing controls, consideration will be given to reducing the risks according to the following hierarchy:

- Elimination
- Substitution
- Isolation
- Engineering controls
- Signage/warnings and/or administrative controls
- Personal protective equipment.

SFPL has documented the aspect/hazards identification and impact /risks assessment and updated when necessary. We will ensure that all significant aspects and hazards are taken into account in establishing, implementing and maintaining its IMS management systems.

Reference : Procedure for EMS Aspect & Impact Identification and HIRA – SFPL /HSE/001

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6.1.3 Compliance obligations (As per ISO 14001 Cl. Ref 6.1.3 and as per ISO 45001:2018 Cl. Ref 6.1.3)

SFPL will:

- a. determine and have access to compliance obligations pertaining to its environmental aspects;
- b. determine and have access to up-to-date legal requirements and other requirements that are applicable to its hazards, OH&S risks and OH&S management system;
- c. determine how these compliance obligations apply to the department; and take these compliance obligations into account when establishing, implementing, maintaining and continually improving its HSE.
- d. SFPL will maintain documented information of its compliance obligations.

SFPL has established, implement and maintain a procedure to identify any applicable legal and other requirements that are applicable to HSE regulatory requirement on aspects and hazards. SFPL has determined how HSE requirements are applied to its HSE aspects and hazards. Those applicable legal and other requirements will be communicated to employees and other relevant parties involved and will be updated accordingly. Where any changes to the legal exist, the aspect related will be accessed and re-evaluated. The reviewed of the legal and other requirements will be considered when:

- a) New product, activity, process, or services is planned.
- b) An existing product or process is modified

SFPL will ensure that all applicable legal and other requirements subscribes are taken into account in establishing, implementing and maintaining its HSE management systems.

Reference: SFPL /HSE/002 - Legal & Other Requirements and Legal register list and evaluation – SFPL /LEG/L/01

6.1.4 Planning to take action

SFPL will plan:

a. to take actions to address:

1. significant environmental aspects;
2. compliance obligations;
3. risks and opportunities defined in 6.1.1;

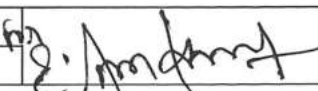

b. how to:

- integrate and implement the actions into its EMS processes; and
- evaluate the effectiveness of these actions.

When planning these actions, SFPL will consider its technological option and its financial and business requirements.

6.2 Integrated Quality, Health, Safety and Environment Objective

SFPL established Integrated Quality, Health, Safety and Environment objectives at relevant functions, levels and processes needed for the QMS. (Reference: Integrated Quality, Health, Safety and Environment Objectives – IMSM 002).

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6.2.1 The Integrated Quality, Health, Safety and Environment objectives will:

- a) be consistent with the Integrated Quality, Health, Safety and Environment policy;
- b) be measurable; c) take into account applicable requirements;
- d) be relevant to conformity of products and services and to enhancement of customer satisfaction;
- e) be monitored; f) be communicated;
- g) be updated as appropriate.

6.2.2 The planning how to achieve Integrated Quality, Health, Safety and Environment objectives, SFPL has determined:

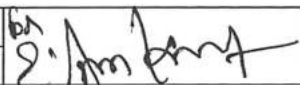

- a) what will be done;
- b) what resources will be required;
- c) who will be responsible;
- d) when it will be completed;
- e) how the results will be evaluated.

The objectives will be established, implemented and reviewed with the consideration of following issues:-

- Significant HSE aspects and impacts and hazards and risk.
- Legal and other requirements.
- Commitment to HSE policy.
- View of employee through suggestion.
- View of interested parties.
- Technological options, financial, operational and business requirements.
- Past records of accident, incident and non-conformances.
- Result of management review.

The objective and target are define in the Objective and Target Form QM 5.4.1 and will be reviewed at least once in a year .SFPL has established, implemented and maintained a documented HSE programme to achieve its objectives and target. The program will indicate the means of achieving its objectives within a specific period. The relevant department is required to established a HSE program that consists details of action plan that SFPL wants to improve and consistent to the SFPL HSE policy. The HSE Council will provide guidance in creating, and periodically reviewing department or functional specific HSE Management programme. The management program is shown in the HSE Management Programme Form QM 5.4.1-001, In conformance with clause 4.4, Quality Management System and determined processes of this Manual, documented information of HSE Objectives will be established, implemented and maintained. The requirement of documented information control procedure is regulated.

In conformance with clause 4.4, Integrated Quality, Health, Safety and Environment Management System and determined processes of this Integrated Quality, Health, Safety and Environment Manual, documented

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information of Integrated Quality, Health, Safety and Environment Objectives will be established, implemented and maintained.

The requirement of documented information control procedure is regulated.

Top management of SFPL will ensure that Integrated Quality, Health, Safety and Environment objectives to meet customer requirements are defined, established, and maintained for relevant functions, processes, and levels throughout SFPL .

The results of SFPL 's review regarding interested parties and their relevant requirements will be considered when SFPL establishes its annual (at a minimum) Integrated Quality, Health, Safety and Environment objectives and related performance targets (internal and external).

Integrated Quality, Health, Safety and Environment objectives at the following functions have been established.

- Research, Formula & Process - Design & Development
- Production
- Purchase
- Human Resource.
- Maintenance
- Quality Inspection, Laboratory and Calibration

Targets to be achieved during a specified time frame are defined.

Progress towards achieving the Integrated Quality, Health, Safety and Environment objectives and review of trends are carried out during periodical review meetings at functional level. Overall trends towards achieving the Integrated Quality, Health, Safety and Environment objectives of SFPL is reviewed in the management review meetings.

(Reference: Integrated Quality, Health, Safety and Environment Objectives)

6.3 Planning of changes

When SFPL determines the need for changes to the QMS, the changes will be carried out in a planned manner (according to clause 4.4.1 and 4.4.2 of the standard). SFPL, will consider:

- a) the purpose of the changes and their potential consequences; see clause 6.1 (Risk management of this Integrated Quality, Health, Safety and Environment Manual)
- b) the integrity of the Integrated Quality, Health, Safety and Environment management system; (See 7.5 of this Integrated Quality, Health, Safety and Environment Manual)
- c) the availability of resources; (see clause 7.1.1 of this Integrated Quality, Health, Safety and Environment Manual where the changes is applied, it will follow according to documented information control procedure)

(Reference: Procedure for New Product Development – SFPL /COP/002, Production-SFPL /COP/004, Quality-SFPL /COP/005, Purchasing - SFPL /SOP/003).

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7.1 Resource

7.1.1 General

SFPL will determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the QMS, EMS & OH&S. Determination will include:

- a) the capabilities of, and constraints on, existing internal resources;
- b) what needs to be obtained from external providers

The adequacy of resources laid down in clause 7.1.2 People, 7.1.3 Infrastructure, 7.1.4 Environment for the operation of processes, 7.1.5 Monitoring and measuring resources and 7.1.6 Organizational Knowledge will be reviewed by top management of SFPL as it required by clause 9.3 Management Review of this Integrated Quality, Health, Safety and Environment Manual.

7.1.2 People

SFPL has determined and provided the persons necessary for the effective implementation of its Integrated Quality, Health, Safety and Environment management system and for the operation and control of its processes. Determination of qualified personnel will be addressed in clause 7.2 Competence of this Integrated Quality, Health, Safety and Environment Manual.

Job Description

Below criteria's are used to develop job description for personnel.

- (i) Appropriate education
- (ii) Training
- (iii) Skills
- (iv) Experience

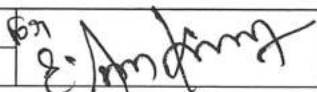

Recruitment based on Competence, Awareness and Training

Recruitment of personnel performing work-affecting Integrated Quality, Health, Safety and Environment is based on job description of the position, which describes competence in education, experience, training and skills. If the selected candidate does not meet the specified job description, then appropriate training should be arranged to meet the job scope.

It is the responsibility of the department managers to identify if the competence level of personnel performing work is sufficient to produce Integrated Quality, Health, Safety and Environment product. If otherwise, the manager has to nominate personnel for appropriate training. On completion of training, the effectiveness of the training on the employee should be evaluated. Organization also will routinely conduct /, EMS & OH&S awareness training to all personnel, to create awareness on the relevance and importance of their work to QMS, EMS & OH&S.

Human Resource department is responsible for collating Training Need Analysis, organizing training and maintaining personal records on education, experience, skill and training.

(Reference: Procedure –SFPL /SOP/010 - Human Resources Planning and Recruitment and SFPL /MOP/009 - Competence Awareness Training).

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7.1.3 Infrastructure

SFPL has determined, provided and maintained the infrastructure necessary for the operation of its processes and to achieve conformity of products and services. Determination of Infrastructure within SFPL is including:

- a) buildings and associated utilities;
- b) equipment, including hardware and software;
- c) transportation resources;
- d) information and communication technology.

All abovementioned infrastructure will be appropriately maintained in order to facilitate towards positive outcome and to ensure the smoothness of process control as it defined in clause 8.5.1 Production control of this Integrated Quality, Health, Safety and Environment Manual.

Description

Infrastructure mentioned above include:

- (i) Building : Factory and utilities
- (ii) Equipment : Machinery
- (iii) Supporting services : transport, forklift, communication systems.

A preventive maintenance plan is scheduled for above facilities.

Multi disciplinary approach is used during development of plant, facilities, and equipment plans. While developing plant layouts consideration is given to optimization of material travel, handling, value -added use of floor space and synchronous material flow. Methods have been developed to evaluate and monitor the effectiveness of existing operations.

(Reference: Procedure –SFPL /SOP/008- Plant and Equipment Maintenance and SFPL /MOP/011 - Plant Facility and Equipment Planning)

7.1.4 Environment for the operation of processes

SFPL has determined, provided and maintained the environment necessary for the operation of its processes and to achieve conformity of products and services.

A suitable environment within SFPL can be a combination of human and physical factors, such as:

- a) social (e.g. non-discriminatory, calm, non-confrontational);
- b) psychological (e.g. stress-reducing, burnout prevention, emotionally protective);
- c) physical (e.g. temperature, heat, humidity, light, airflow, hygiene, noise).

These abovementioned factors can be associated with the elements defined in section 6.1 Risk Management.

The maintenance of environment is also important to ensure the smoothness of process control as it defined in clause 8.5.1 Production control of this Integrated Quality, Health, Safety and Environment Manual

(Reference: Procedure –SFPL /SOP/011 - Employee Motivation and Work Environment)

7.1.5 Monitoring and measuring resources

SFPL has determined and provided the resources needed to ensure valid and reliable results when monitoring or measuring is used to verify the conformity of products and services to requirements.

Therefore, SFPL will ensure that the resources provided:

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a) are suitable for the specific type of monitoring and measurement activities being undertaken;

b) are maintained to ensure their continuing fitness for their purpose.

Evidence of fitness for purpose of the monitoring and measurement resources will retain as documented information and controlled according to Documented Information Control Procedure

When measurement traceability is a requirement, or is considered by SFPL to be an essential part of providing confidence in the validity of measurement results, measuring equipment will be:

- a) calibrated or verified, or both, at specified intervals, or prior to use, against measurement standards traceable to international or national measurement standards; when no such standards exist, the basis used for calibration or verification will be retained as documented information;
- b) identified in order to determine their status;
- c) safeguarded from adjustments, damage or deterioration that would invalidate the calibration status and subsequent measurement results.

Where the validity of previous measurement results has been adversely affected when measuring equipment is found to be unfit for its intended purpose, action will be taken in accordance with clause 8.7 Control of Nonconforming output of this Integrated Quality, Health, Safety and Environment Manual.

(Reference: Procedure –SFPL /COP/005 - Quality Assurance).

7.1.5.2 Measurement traceability

When measurement traceability is a requirement, or is considered by SFPL to be an essential part of providing confidence in the validity of measurement results, measuring equipment will be:

- a) calibrated or verified, or both, at specified intervals, or prior to use, against measurement standards traceable to international or national measurement standards; when no such standards exist, the basis used for calibration or verification will be retained as documented information;
- b) identified in order to determine their status;
- c) safe guarded from adjustments, damage or deterioration that would invalidate the calibration status and subsequent measurement results.

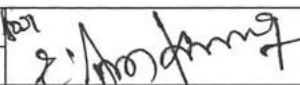

SFPL will determine if the validity of previous measurement results has been adversely affected when measuring equipment is found to be unfit for its intended purpose, and will take appropriate action as necessary.

(Reference: Procedure –SFPL /COP/005 - Quality Assurance)

7.1.6 Organizational Knowledge

SFPL has determine the knowledge necessary for the operation of its processes and to achieve conformity of products and services.

This knowledge will be maintained and be made available to the extent necessary. When addressing changing needs and trends, SFPL will consider its current knowledge and determine how to acquire or access any necessary additional knowledge and required updates.

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Organizational knowledge is knowledge specific to demonstrate conformity to positive outcome of SFPL scope of certification as addressed in section 4.3 of this Integrated Quality, Health, Safety and Environment Manual. Organizational knowledge can gain by experience. It is information that is used and shared to achieve SFPL's objectives. Organizational knowledge also can be based on:

- a) internal sources (e.g. intellectual property; knowledge gained from experience; lessons learned from failures and successful projects; capturing and sharing undocumented knowledge and experience; the results of improvements in processes, products and services);
- b) external sources (e.g. standards; academia; conferences; gathering knowledge from customers or external providers). Management of organizational knowledge will be addressed in clause 7.2 Competence of this Integrated Quality, Health, Safety and Environment Manual

(Reference: Procedure - SFPL /MOP/009 - Competence Awareness Training)

7.2 Competence

- a) The personnel / function competency can be determined from respective Job Description or JD. JD elaborates qualification needed for staff doing the work under their control that affects the performance and effectiveness of the Integrated Quality, Health, Safety and Environment management system.
- b) The competency of personnel is also important to ensure the smoothness of process control as it defined in clause 8.5.1 Production control of this Integrated Quality, Health, Safety and Environment Manual
- c) Consideration of competency may associate the subjects addressed in this Integrated Quality, Health, Safety and Environment Manual through following clause;
 - a. Clause 5.3 Organizational Roles, Responsibility and Authorities
 - b. Clause 7.1.2 People
 - c. Clause 7.1.6 Organizational Knowledge
 - d. Clause 7.3 Awareness
- d) Competency determined when issue being raised from Control of Non-Conformity Procedure

Competence - on the job training

SFPL will provide on-the-job training (which will include customer requirements training) for personnel in any new or modified responsibilities affecting conformity to Integrated Quality, Health, Safety and Environment requirements, internal requirements, regulatory or legislative requirements; this will include contract agency personnel. The level of detail required for on-the-job training will be commensurate with the level of education the personnel possess and the complexity of the task(s) they are required to perform for their daily work. Persons whose work can affect Integrated Quality, Health, Safety and Environment will be informed about the consequences of nonconformity to customer requirements.

On-the -job training is provided to personnel in any new or modified job affecting conformity to product requirements. This includes any contract or agency personnel, Consequences to the customer of nonconformity to Integrated Quality, Health, Safety and Environment requirements are informed to personnel whose work can affect conformity to product requirements.

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(Reference: Procedure - SFPL /MOP/009 - Competence Awareness Training)

7.3 Awareness

SFPL will ensure that persons doing work under SFPL's control are aware of:

- a) the Integrated Quality, Health, Safety and Environment policy;
- b) relevant Integrated Quality, Health, Safety and Environment objectives;
- c) their contribution to the effectiveness of the Integrated Quality, Health, Safety and Environment management system, including the benefits of improved performance;
- d) the implications of not conforming with the Integrated Quality, Health, Safety and Environment management system requirements

Where necessary, training should be conducted and process should follow according to section 7.2 Competence of this Integrated Quality, Health, Safety and Environment Manual.

(Reference: Procedure - SFPL /MOP/009 - Competence Awareness Training)

7.4 Communication

SFPL has determined the internal and external communications relevant to the Integrated Quality, Health, Safety and Environment management system, including:

- a) on what it will communicate;
- b) when to communicate;
- c) with whom to communicate;
- d) how to communicate;
- e) who communicates.

7.4.1 Importance of effective communication

It is important for SFPL to take into account for internal and external communication input from interested parties to ensure that message from them will be managed in proper way

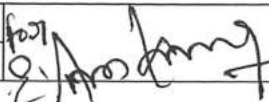

7.4.2 Communication approach

Who	Communication Tools	Receiver
Employee	Email, Memo, CAR, Notice Board	Employee / customer / stakeholder
Customer	Email, written official letter/notice	Employee
Stakeholders	Email, written official letter/notice	Employee

Maintenance of communication tools will follow according to section 7.1.3 Infrastructure of this Integrated Quality, Health, Safety and Environment Manual.

The sign of fail communication may possible cause the following cases to be occurred;

- a) Complaint from customer or stakeholder
- b) Output does not able to achieve the intended result(s) of its Integrated Quality, Health, Safety and Environment management system.
- c) The process is not delivering their intended outputs;

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Channels of communication at relevant functions and levels of SFPL have been established including the nature and content.

Broadly the levels are:

- Level 1 – Top management and functional heads.
- Level 2 – supervisory personnel.
- Level 3 – persons at operational levels.

The channels of internal communication include:

- Communication during implementation of customer related processes as defined in the applicable procedures.
- Periodic departmental review meetings.
- Management review meetings.
- Circulars
- Displays in notice boards.
- Awareness programs.
- Suggestions from employees

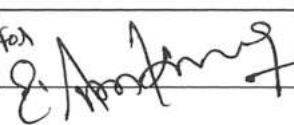

The nature of communication includes information regarding:

- Integrated Quality, Health, Safety and Environment policy and objectives of the company.
- Integrated Quality, Health, Safety and Environment management system including all the processes established.
- Importance of meeting the customer requirements and Integrated Quality, Health, Safety and Environment objectives.
- Business environment.
- Beneficial effects of adhering to the Integrated Quality, Health, Safety and Environment management system on SFPL and individuals.
- Performance during internal audits and actions there on.
- Customer complaints and customer satisfaction trends.
- Performance and targets achieved towards Integrated Quality, Health, Safety and Environment objectives
- Nature and trends in nonconformance during processing, final inspection, receiving inspection and preventive actions to minimize the same.
- Continual improvement plans.
- Resources identification and planning.
- Suggestions received from employees and actions on implementation
- Supplier performance rating and improvement.

(Reference: Procedure - SFPL /HSE/005 - Procedure for Communication)

7.4.3 External communication

SFPL will externally communicate relevant to the QMS EMS & OH&S as determined by its communication processes and as required by its compliance obligations. (Reference: Procedure - SFPL /HSE/005 - Procedure for Communication).

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7.5 Documented Information

Top Management of SFPL will ensure the Integrated Quality, Health, Safety and Environment management system will include:

- a) documented information required by ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018;
- b) documented information determined by SFPL as being necessary for the effectiveness of the Integrated Quality, Health, Safety and Environment management system.

Therefore, SFPL has determined the necessary documented information to be applied within SFPL as follows;

- Management Document
 - Integrated Quality, Health, Safety and Environment Policy
 - Integrated Quality, Health, Safety and Environment Objectives
- Resources
 - Monitoring & measurement document
 - Competency document
- Operation
 - Planning document
 - Service requirement review
 - Control of external provider
 - Process control document
 - Identification & traceability
 - Customer property document
 - Process changed document
 - Release of product
 - Non-conformity
- Monitoring and evaluation
 - Performance monitoring
 - Internal audit
 - Management review
- Improvement
 - Nonconformity
 - Corrective action

Documents required for effective implementation of the Integrated Quality, Health, Safety and Environment management system have been established and controlled.

The structure of Integrated Quality, Health, Safety and Environment system documents is given below:

System procedure – SFPL /IMSP/01 details the methods of control of documents for all the levels.

The control exercised covers:

- a) Personnel responsible for approval of documents for adequacy prior to issue
- b) Personnel responsible for review and updating of documents including re-approval

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- c) c) Methods of identification of documents, identification of changes and current revision status through defined numbering system, and maintenance of master list and control of changes.
- d) Control regarding ensuring that relevant versions of applicable documents are available at points of use and maintenance of a distribution list.
- e) Control towards ensuring that documents remain legible and their replacement when they become illegible.
- f) Documents of external origin, responsibility for maintenance and methods of distribution is detailed in Annex - 6
- g) Removal of obsolete documents from points of use and identification of obsolete documents if retained for any purpose.

7.5.2 Creating and updating

When creating and updating documented information, SFPL will ensure appropriate:

- a) identification and description (e.g. a title, date, author, or reference number);
- b) format (e.g. language, software version, graphics) and media (e.g. paper, electronic);
- c) review and approval for suitability and adequacy.

7.5.3 Control of documented information

7.5.3.1 Documented information required by the Integrated Quality, Health, Safety and Environment management system and by this International Standard are controlled to ensure:

- a) it is available and suitable for use, where and when it is needed;
- b) it is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).

7.5.3.2 For the control of documented information, SFPL will address the following activities, as applicable:

- a) distribution, access, retrieval and use;
- b) storage and preservation, including preservation of legibility;
- c) control of changes (e.g. version control);
- d) retention and disposition.

Documented information of external origin determined by SFPL to be necessary for the planning and operation of the Integrated Quality, Health, Safety and Environment management system will be identified as appropriate, and controlled.

Documented information retained as evidence of conformity will be protected from unintended alterations.

Reference: Procedure – SFPL/MOP/004 - Document and Data Control

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8. OPERATION

8.1 Operational Planning (EMS as per Cl. 8.1 and ISO 45001:2018 Cl. 4.4.6)

SFPL will plan, implement and control the processes;

1. as defined in clause 4.4 Integrated Quality, Health, Safety and Environment Management System and determined processes of this Integrated Quality, Health, Safety and Environment Manual that needed to meet the requirements for the provision of scope of which SFPL being certified (A), and
2. to implement the actions determined in clause 6 of this Integrated Quality, Health, Safety and Environment Manual (Management of Risks and Integrated Quality, Health, Safety and Environment Objectives) , by following table;

QMS, EMS & OH&S PLANNING TABLE

Description	Refer to
a). determining the requirements for the products and services Realization:	8.2. Requirement for products and services of this Integrated Quality, Health, Safety and Environment Manual
b). establishing criteria for: 1. the processes; 2. the acceptance of products and services	1. Business Process Mapping to overview the process criteria, 2. Clause 8.4 Control of externally provided processes, products and services of Integrated Quality, Health, Safety and Environment Manual for purchasing activities or if outsourced process is applicable
c). implementing control of the processes in accordance with the criteria Realization:	3. Clause 8.5.1 Production control of this Integrated Quality, Health, Safety and Environment Manual for operational control process, and 4. Clause 8.6 Release of products and services of this Integrated Quality, Health, Safety and Environment Manual for handing over process
d). determining the resources needed to achieve conformity to the product and service requirements Realization:	1. Clause 7.1 Resource of this Integrated Quality, Health, Safety and Environment Manual 2. If outsourced processes or external provided process are applied, clause 8.4 Control of externally provided processes, products and services of this Integrated Quality, Health, Safety and Environment Manual will be referred.
e). determining and keeping documented information to the extent necessary: 1. to have confidence that the processes have been carried out as planned; 2. to demonstrate the conformity of products and services to their requirements.	Control of documented information will be according to clause 7.5 Documented Information. All abovementioned activity will be maintained in order to ensure; 1. The output of this planning remains suitable for SFPL's operations. 2. Ability of the planning adequately controlled and

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QMS, EMS & OH&S PLANNING TABLE	
Description	Refer to
Realization:	consequences of unintended changed can be reviewed so that action can be taken to mitigate any adverse effects, as necessary

(Reference: Procedure for New Product Development – SFPL /COP/002, Production-SFPL /COP/004, Quality-SFPL /COP/005, Purchasing - SFPL /SOP/003)

8.2 EMERGENCY PREPAREDNESS AND RESPONSE (EMS and OH&S AS PER CL.8.2)

SFPL has established, implemented and maintained procedure to identify potential for and responses to incidents and emergency situations, and for preventing and mitigating the likely illness and injury that may be associated with them.

HSE Council through ERT Group will provide the:

- Guidelines to each department for use in identifying operations and activities that can cause significant HSE impacts and risks that should an accident or emergency occur.
- Implements operating procedures which addresses preparedness and prevention to accidents or emergency that can create a threat to health, safety of the environment.
- The operating procedures and control of emergency preparedness and response will consider the below areas:

By activity, product or services on routine, non-routine and emergencies

- Fire, explosion, injuries or accidental discharges or spills of oil, solvent or acids or released to air, water and land.
- By locations or locali
- Flood, natural disaster, bomb-threat etc.
- By others - Food poisoning, hysteria and etc.

All Departments will establish implement and maintain the processes needed to prepare for and respond to potential HSE emergency situations identified in ISO 14001:2015 Cl. 6.1.1 and ISO 45001:2018 Cl. 4.3.2.

The SFPL will:

- a) Prepare to respond by planning actions to prevent or mitigate adverse HSE impacts from emergency situations;
- b) Respond to actual emergency situations and accidents;
- c) Take action to reduce the consequences of HSE emergency situations, appropriate to the magnitude of emergency or accident and the potential HSE impact;
- d) Periodically test the planned response actions, where practicable;
- e) Periodically review and, where necessary, revise the processes and planned response actions, in particular, after the occurrence of accidents and emergency situations or tests; and

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- f) Provide relevant information and training related to emergency preparedness and response, as appropriate, to all relevant interested parties, including persons working under its control.

The SFPL will maintain documented information to the extent necessary to have confidence that the processes are carried out as planned. (Reference: Procedure for Emergency Preparedness & Response–SFPL /HSE/003)

8.2. Requirement for products and services

8.2.1 Customer communication

Communication with customers will follow according to clause 7.4 Communication of this Integrated Quality, Health, Safety and Environment Manual in order to ensure the smoothness of the following process.

- providing information relating to products and services; during tendering / bidding process
- handling enquiries, contracts or orders, including changes;
- obtaining customer feedback relating to products and services, Whenever receive complaints from customer solution process will follow according to clause 10.2 Nonconformity and corrective action of this Integrated Quality, Health, Safety and Environment Manual
- handling or controlling customer property, if applicable. (Refer to clause 8.5.3 Property belonging to customers or external providers of this Integrated Quality, Health, Safety and Environment Manual for details)
- establishing specific requirements for contingency actions, when relevant.

(Reference: Procedure for Sales & Marketing– SFPL /COP/001)

8.2.2 Determining the requirements related to products and services

When determining the requirements for the products and services to be offered to customers, the designated person will ensure that:

- the requirements for the products and services as defined in the Contract Document , including:
 - any applicable statutory and regulatory requirements;
 - those considered necessary by the SFPL ;
- SFPL can meet the claims for the products and services it offers as defined in the contract document.(Reference: Procedure for Sales & Marketing– SFPL /COP/001)

8.2.3 Review of requirements related to products and services

SFPL will ensure that it has the ability to meet the requirements for products and services to be offered to customers. SFPL will conduct a review before committing to supply products and services to a customer, to include:

REVIEW REQUIREMENT TABLE	
Description of requirement	Source
requirements specified by the customer, including the requirements for delivery and post-delivery activities;	Contract Document Post-delivery activities excluded as per the scope of certification
requirements not stated by the customer, but necessary for the	Legal Requirement

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IMS Coordinator		Managing Director	

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REVIEW REQUIREMENT TABLE	
Description of requirement	Source
specified or intended use, when known;	
requirements specified by SFPL ;	As per clause 8. Operation of this Integrated Quality, Health, Safety and Environment Manual
statutory and regulatory requirements applicable to the products and services;	As per contract document As per Risk Analysis
contracts or order requirements differing from those previously expressed	As per contract document

Designated person will ensure that contracts or order requirements differing from those previously defined are resolved.

The customer's requirements will be confirmed by the authorized person before acceptance, when it is the case of customer does not provide a documented statement of their requirements.

Documented information will be controlled according to clause 7.5 Documented Information of this Integrated Quality, Health, Safety and Environment Manual as applicable when:

- a) on the results of the review;
- b) on any new requirements for the products and services

8.2.3.2 SFPL will retain documented information, as applicable:

- a) on the results of the review;
- b) on any new requirements for the products and services.

(Reference: Procedure for Sales & Marketing– SFPL /COP/001).

8.2.4 Changes to requirements for products and services

Designated person will ensure that relevant documented information will follow clause 7.5 Documented Information for the amendment process.

Also, the team member will aware of the changed requirements, when the requirements for products and services are changed according to clause 7.4 Communication of this Integrated Quality, Health, Safety and Environment Manual.

Where applicable, the process will follow according to documented information control procedure

(Reference: Procedure for Sales & Marketing– SFPL /COP/001).

8.3 Design and development of products and services

8.3.1 Changes to requirements for services

SFPL has established, implemented and maintained process design and development that is appropriate to ensure the subsequent provision of services.

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8.3.2 Design and development planning

In determining the stages and controls for design and development, SFPL will consider:

- a) the nature, duration and complexity of the design and development activities;
- b) the required process stages, including applicable design and development reviews;
- c) the required design and development verification and validation activities;
- d) the responsibilities and authorities involved in the design and development process;
- e) the internal and external resource needs for the design and development of services;
- f) the need to control interfaces between persons involved in the design and development process;
- g) the need for involvement of customers and users in the design and development process;
- h) the requirements for subsequent provision of services;
- i) the level of control expected for the design and development process by customers and other relevant interested parties;
- j) the documented information needed to demonstrate that design and development requirements have been met.

(Reference: Procedure for New Product Development– SFPL /COP/002)

8.3.3 Design and development inputs

SFPL has determined the requirements essential for the specific types of services to be designed and developed. SFPL will consider:

- a) functional and performance requirements;
- b) information derived from previous similar design and development activities;
- c) statutory and regulatory requirements;
- d) standards or codes of practice that SFPL has committed to implement;
- e) potential consequences of failure due to the nature of the services.

Inputs will be adequate for design and development purposes, complete and unambiguous.


Conflicting design and development inputs will be resolved. SFPL will retain documented information on design and development inputs (Reference: Procedure for New Product Development– SFPL /COP/002)

8.3.4 Design and development controls

SFPL will apply controls to the design and development process to ensure that:

- a) the results to be achieved are defined;
- b) reviews are conducted to evaluate the ability of the results of design and development to meet requirements;
- c) verification activities are conducted to ensure that the design and development outputs meet the input requirements;
- d) validation activities are conducted to ensure that the resulting services meet the requirements for the specified application or intended use;
- e) any necessary actions are taken on problems determined during the reviews, or verification and validation activities;
- f) documented information of these activities is retained.

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NOTE Design and development reviews, verification and validation have distinct purposes. They can be conducted separately or in any combination, as is suitable for the services of SFPL .

(Reference: Procedure for New Product Development– SFPL /COP/002)

8.3.5 Design and development outputs

SFPL will ensure that design and development outputs:

- a) meet the input requirements;
- b) are adequate for the subsequent processes for the provision of services;
- c) include or reference monitoring and measuring requirements, as appropriate, and acceptance criteria;
- d) specify the characteristics of the services that are essential for their intended purpose and their safe and proper provision.

SFPL will retain documented information on design and development outputs.

(Reference: Procedure for New Product Development– SFPL /COP/002)

8.3.6 Design and development changes

SFPL will identify, review and control changes made during, or subsequent to, the design and development of services, to the extent necessary to ensure that there is no adverse impact on conformity to requirements.

SFPL will retain documented information on:

- a) design and development changes;
- b) the results of reviews;
- c) the authorization of the changes;
- d) the actions taken to prevent adverse impacts.

(Reference: Procedure for New Product Development– SFPL /COP/002).

8.4 Control of externally provided processes, products and services

SFPL will ensure that externally provided processes, products and services or commonly known as purchasing process conform to requirements.


Note: Scope of activity of externally provided processes has been elaborately explained in Annex A.8 Control of externally provided processes, products and services of the ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 standard.

Control of externally provided process are including

- a) Determination of purchasing control including selection, evaluation, re-evaluation and monitoring of external provider (supplier)
- b) Type and extent of control of purchasing process
- c) Effective communication to external provider or supplier

Detail of externally provided process control should refer to Purchasing Procedure Result of performance of external provider will be reviewed by top management of SFPL as it required by clause 9.3 Management review of this Integrated Quality, Health, Safety and Environment Manual

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(Reference: Procedure for Supplier Selection, Evaluation and Reevaluation– SFPL /SOP/002, Procedure for Purchasing– SFPL /SOP/003 and Procedure for Supplier Development and Monitoring– SFPL /SOP/004)

8.4.2 Type and extent of control

SFPL will ensure that externally provided processes, products and services do not adversely affect SFPL's ability to consistently deliver conforming products and services to its customers.

SFPL will:

- a) ensure that externally provided processes remain within the control of its Integrated Quality, Health, Safety and Environment management system;
- b) define both the controls that it intends to apply to an external provider and those it intends to apply to the resulting output;
- c) take into consideration:
 - 1) the potential impact of the externally provided processes, products and services on SFPL's ability to consistently meet customer and applicable statutory and regulatory requirements;
 - 2) the effectiveness of the controls applied by the external provider;
- d) determine the verification, or other activities, necessary to ensure that the externally provided processes, products and services meet requirements.

(Reference: Procedure for Supplier Selection, Evaluation and Reevaluation– SFPL /SOP/002, Procedure for Purchasing– SFPL /SOP/003 and Procedure for Supplier Development and Monitoring– SFPL /SOP/004)

8.4.3 Information for external providers

SFPL will ensure the adequacy of requirements prior to their communication to the external provider.

SFPL will communicate to external providers its requirements for:

- a) the processes, products and services to be provided;
- b) the approval of:
 - 1) products and services;
 - 2) methods, processes and equipment;
 - 3) the release of products and services;
- c) competence, including any required qualification of persons;
- d) the external providers' interactions with SFPL ;
- e) control and monitoring of the external providers' performance to be applied by SFPL ;
- f) verification or validation activities that SFPL , or its customer, intends to perform at the external providers' premises.

(Reference: Procedure for Supplier Selection, Evaluation and Reevaluation– SFPL /SOP/002, Procedure for Purchasing– SFPL /SOP/003 and Procedure for Supplier Development and Monitoring– SFPL /SOP/004).

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8.5 Production and service provision

8.5.1 Production control

SFPL will implement production and service provision under controlled conditions. Controlled conditions of process control are as follows:

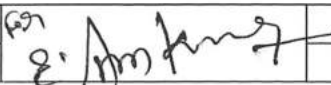

PROCESS CONTROL TABLE	
Description	Reference
a) the availability of documented information that defines: 1) the characteristics of the products to be produced, the services to be provided, or the activities 2) to be performed; 3) the results to be achieved;	Process control procedure
b) the availability and use of suitable monitoring and measuring resources;	Process control procedure and clause 7.1.5 Monitoring and measuring resources
c) the implementation of monitoring and measurement activities at appropriate stages to verify that criteria for control of processes or outputs, and acceptance criteria for products and services, have been met;	Process control procedure
d) the use of suitable infrastructure and environment for the operation of processes;	Refer to; 7.1.3 Infrastructure 7.1.4 Environment for the operation of processes
e) the appointment of competent persons, including any required qualification;	Refer to; 7.2 Competence
f) the validation, and periodic revalidation, of the ability to achieve planned results of the processes for production and service provision, where the resulting output cannot be verified by subsequent monitoring or measurement;	Process control procedure
g) the implementation of actions to prevent human error;	Risk analysis nonconformance and Corrective action
h) the implementation of release, delivery and post-delivery activities.	Process control procedure Post-delivery activity excluded as per the scope of certification

Suitable infrastructure includes appropriate manufacturing equipment required to ensure product compliance. Monitoring and measuring resources include appropriate monitoring and measuring equipment required to ensure effective control of manufacturing processes.

(Reference: Procedure for Production – SFPL /COP/004, Procedure for Quality – SFPL /COP/005).

8.5.2 Identification and traceability

SFPL will use suitable means to identify outputs when it is necessary to ensure the conformity of products and services. That is including the control of;

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1. Identification of status of outputs with respect to monitoring and measurement requirements throughout production and service provision as defined in 8.5.1 Production control
2. The unique identification of the outputs when traceability is a requirement through the process defined in clause 8.2.2 Determining the requirements related to products and services and clause 8.2.3 Review of requirements related to products and services of this Integrated Quality, Health, Safety and Environment Manual. To maintain the identification and traceability by retaining the documented information according to documented information control procedure.

(Reference: Procedure for Production – SFPL /COP/004, Procedure for Quality – SFPL /COP/005)

8.5.3 Property belonging to customers or external providers

At present there are no items given by customers for incorporation or use during manufacturing of products. However documents such as technical specification & standards provided by customer are identified, safeguarded & updated till these documents are applicable.

SFPL will exercise care with property belonging to external providers while it is under SFPL's control or being used by SFPL. SFPL will identify, verify, protect and safeguard external providers' property provided for use or incorporation into the products and services. When the property of a external provider is lost, damaged or otherwise found to be unsuitable for use, the designated personnel will report this to the customer or external provider and retain documented information on what has occurred.

(Reference: Procedure for Material Handling Storage and Preservation – SFPL /SOP/006).

8.5.4 Preservation

SFPL will preserve the outputs during production and service provision, to the extent necessary to ensure conformity to requirements.

NOTE Preservation can include identification, handling, contamination control, packaging, storage, transmission or transportation, and protection.

(Reference: Procedure for Material Handling Storage and Preservation – SFPL /SOP/006)

8.5.5 Post-delivery activities

SFPL will meet requirements for post-delivery activities associated with the products and services.

In determining the extent of post-delivery activities that are required, SFPL will consider:

- a) statutory and regulatory requirements;
- b) the potential undesired consequences associated with its products and services;
- c) the nature, use and intended lifetime of its products and services;
- d) customer requirements;
- e) customer feedback.

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

(Reference: Procedure for Sales & Marketing – SFPL /COP/001).

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8.5.6 Control of changes

SFPL will review and control changes for production or service provision, to the extent necessary to ensure continuing conformity with requirements. SFPL will retain documented information describing the results of the review of changes, the person(s) authorizing the change, and any necessary actions arising from the review. Where the changes are applied, documented information control procedure must follow to comply.

(Reference: Procedure for Quality – SFPL /COP/005, Procedure for Control of nonconforming work – SFPL /MOP/006, Procedure for Corrective Action-SFPL /MOP/007)

8.6 Release of products and services

SFPL will implement planned arrangements, at appropriate stages, to verify that the product and service requirements have been met. The release of products and services to the customer will not proceed until the planned arrangements have been satisfactorily completed in accordance with clause 8.5.1 Production control of this Integrated Quality, Health, Safety and Environment Manual Any abnormality which does not meet with requirement from customer, resolution should be made through clause 8.7 Control of nonconforming output of this Integrated Quality, Health, Safety and Environment Manual where, the product only can be released unless obtained approval by a determined authority and, as applicable, by the customer. The record of released product will be retained as documented information in accordance with documented information control procedure to ensure;

- a) evidence of conformity with the acceptance criteria;
- b) traceability to the person(s) authorizing the release.

(Reference: Procedure for Quality – SFPL /COP/005, Procedure for Control of nonconforming work – SFPL /MOP/006, Procedure for Corrective Action - SFPL /MOP/007).

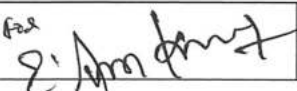

8.7 Control of Nonconforming output


SFPL will ensure that outputs that do not conform to their requirements are identified and controlled to prevent their unintended use or delivery. SFPL will take appropriate action based on the nature of the nonconformity and its effect on the conformity of products and services. This will also apply to nonconforming products and services detected after delivery of products, during or after the provision of services. The ways of dealing with nonconforming outputs must be according to one or more of the following measures:

- a) correction;
- b) segregation, containment, return or suspension of provision of products and services;
- c) informing the customer;
- d) obtaining authorization for acceptance under concession. Conformity to the requirements will be verified when nonconforming outputs are corrected.

SFPL will retain documented information that:

- a) describes the nonconformity;
- b) describes the actions taken;
- c) describes any concessions obtained;

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Identifies the authority deciding the action in respect of the nonconformity Control of nonconforming outputs will follow according to Control of Non-conformity procedure information on nonconformities will be reviewed by top management of SFPL as it required by clause 9.3 Management review of this Integrated Quality, Health, Safety and Environment Manual.

(Reference: Procedure for Quality – SFPL /COP/005, Procedure for Control of nonconforming work – SFPL /MOP/006, Procedure for Corrective Action-SFPL /MOP/007)

9. PERFORMANCE EVALUATION

9.1 Monitoring, measurement, analysis and evaluation

9.1.1 General

SFPL will

1. Determine:

- a. what needs to be monitored and measured;
- b. the methods for monitoring, measurement, analysis and evaluation needed to ensure valid results;
- c. when the monitoring and measuring will be performed;
- d. when the results from monitoring and measurement will be analyzed and evaluated.

2. Evaluate the performance and the effectiveness of the Integrated Quality, Health, Safety and Environment management system.

3. The HSE will communicate information relevant to its environmental performance both internally and externally, as determined by its communication process and as required by compliance obligations.

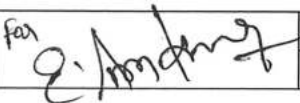

4. Retain appropriate documented information as evidence of the results according to documented information control procedure

SFPL has established and maintained procedures to monitors and measure HSE performance on a regular basis that related to the significant impact and risks and other than that:

- Both qualitative and quantitative measures, appropriate to the needs of SFPL.
- Monitor the objective and target are met.
- Proactive measures of performance that monitors compliance with the HSE managements programme and operational criteria.
- Reactive measures of performance to monitors accidents, ill health, incidents (including near-misses) and other historical evidence of deficient HSE performance.
- Recording of data and results of monitoring and measurements sufficient to facilitate subsequent corrective and preventive action analysis.
- Evaluation of compliances with legal & other requirement to be conducted by SFPL at once a year.

The equipment used for the purpose of monitoring and measurement will be calibrated and maintained. Record of calibration and maintenance activities and results will be retrained.

The monitoring and measurement will be identified based on the activities described as below:-

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- Monitoring the progress of the objective, target and programme established.
- Monitoring and measurement of the operational control established.

EVALUATION ANALYSIS			
WHAT	METHOD OF MONITORING & EVALUATION	FREQUENCY OF MONITORING (DATA COLLECTION)	FREQUENCY OF ANALYSIS ON RESULT
a) Performance and effectiveness of the integrated management system	KPI	Monthly	Quarterly
b) Effectiveness of integrated management system planning	Internal Audit	Annually	Annually
c) the effectiveness of actions taken to address risks and opportunities;	1. Internal Audit, and 2. Clause 10.2 Nonconformity and corrective action	Annually	Monthly
d) the performance of external providers;	Supplier evaluation	Annually	Annually
e) Needs for improvements to the integrated Management System	Management Review	Annually	Annually

(Reference: Procedure for Legal & Other Requirements – SFPL /HSE/002).

9.1.2 Customer satisfaction (QMS)

SFPL will monitor customers' perceptions of the degree to which their needs and expectations have been fulfilled. SFPL has determined the methods for obtaining, monitoring and reviewing this information. Method of evaluation should refer to clause 9.1.3 Analysis and evaluation of this Integrated Quality, Health, Safety and Environment Manual result of monitoring activity will be reviewed by top management of SFPL as it required by clause 9.3 Management review of this Integrated Quality, Health, Safety and Environment Manual . Refer Procedure for Sales & Marketing – SFPL /COP/001

9.1.2 Evaluation of compliance (EMS as per Cl. 9.1.2 and OH&S as per Cl. 9.1.2)

SFPL will analyse and evaluate appropriate data and information arising from monitoring and measurement. The results of analysis will be used in accordance with below table;

EVALUATION ANALYSIS			
WHAT	METHOD OF	FREQUENCY OF	FREQUENCY OF

Prepared By IMS Coordinator	<i>[Signature]</i>	Approved By Managing Director	<i>[Signature]</i>
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	MONITORING & EVALUATION	MONITORING (DATA COLLECTION)	ANALYSIS ON RESULT
Applicable Statutory and Legal Compliance and compliance to other requirements of KSM	1. Internal Audit, and 2. Clause 10.2 Nonconformity and corrective action	As & When required	As per plan

Result of analysis and evaluation will be reviewed by top management of SFPL as it required by clause 9.3 Management review of this Manual.

(Reference: Procedure for Legal & Other Requirements – SFPL /HSE/002)

9.1.3 Analysis and evaluation (QMS)

SFPL will analyse and evaluate appropriate data and information arising from monitoring and measurement. The results of analysis will be used in accordance with below table;

EVALUATION ANALYSIS			
WHAT	METHOD OF MONITORING & EVALUATION	FREQUENCY OF MONITORING (DATA COLLECTION)	FREQUENCY OF ANALYSIS ON RESULT
a) conformity of products and services	KPI (Customer end, Internal and Purchased products)	Monthly	Quarterly
b) customer satisfaction	Customer Satisfaction evaluation	Annually	Annually
c) Performance and effectiveness of the Integrated Quality, Health, Safety and Environment management system	KPI	Monthly	Quarterly
d) Effectiveness of Integrated Quality, Health, Safety and Environment management system planning	Internal Audit	Annually	Annually
e) the effectiveness of actions taken to address risks and opportunities;	1. Internal Audit, and 2. Clause 10.2 Nonconformity and corrective action	Annually	Annually

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EVALUATION ANALYSIS			
WHAT	METHOD OF MONITORING & EVALUATION	FREQUENCY OF MONITORING (DATA COLLECTION)	FREQUENCY OF ANALYSIS ON RESULT
f) the performance of external providers;	Supplier evaluation	Annually	Annually
g) Needs for improvements to the Integrated Quality, Health, Safety and Environment management system.	Management Review	Annually	Annually

Result of analysis and evaluation will be reviewed by top management of SFPL as it required by clause 9.3 Management review of this Integrated Quality, Health, Safety and Environment Manual (Reference: Evaluation Of Compliance –EOHS/008, Monitoring & Measurement – EOHS/010 and Incident Investigation – EOHS/011).

9.2 Internal Audit (including 9.2.1-General and 9.2.2-Internal Audit Programme)

SFPL will conduct internal audits **once in 6 months** to provide information on whether the Integrated Quality, Health, Safety and Environment management system:

a) Conforms to

- 1) SFPL's own requirements for its Integrated Quality, Health, Safety and Environment management system;
- 2) the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018;

b) is effectively implemented and maintained. Execution of internal audit will include;

- a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which will take into consideration the importance of the processes concerned, changes affecting SFPL, and the results of previous audits;
- b) define the audit criteria and scope for each audit;
- c) select auditors and conduct audits to ensure objectivity and the impartiality of the audit process;
- d) ensure that the results of the audits are reported to relevant management;
- e) take appropriate correction and corrective actions without undue delay
- f) ensure that the results of the audits are reported to relevant managers; ensure that relevant audit results are reported to workers, and, where they exist, workers' representatives, and other relevant interested parties;
- g) retain documented information as evidence of the implementation of the audit programme and the audit results. Details of internal audit activities will follow according to Internal audit procedure

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Result of internal audit activity will be reviewed by top management of SFPL as it required by clause 9.3 Management Review of this Integrated Quality, Health, Safety and Environment Manual

Reference: Procedure for Internal Audit - SFPL /MOP/005

9.3 Management Review (EMS – Cl. 9.3 & OH&S as per Cl. 4.6)

9.3.1 General


Top management of SFPL will review SFPL's Integrated Quality, Health, Safety and Environment management system, **once in 6 months**, to ensure its continuing suitability, adequacy, effectiveness and alignment with the strategic direction of SFPL. The management review is coordinated by MR, chaired by Director and attended by members of the Integrated Quality, Health, Safety and Environment Management Committee. Reference: Procedure for MRM – SFPL /MOP/008.

9.3.2 Management Review Inputs

The management of SFPL review will be planned and carried out taking into consideration:

- a) the status of actions from previous management reviews;
- b) changes in external and internal issues that are relevant to the Integrated Quality, Health, Safety and Environment management system including the needs and expectations of interested parties, legal requirements and other requirements and risks and opportunities;
- c) IMS Policy and IMS Objectives
- d) information on the performance and effectiveness of the Integrated Quality, Health, Safety and Environment management system, including trends in:
 - 1) customer satisfaction and feedback from relevant interested parties;
 - 2) the extent to which Integrated Quality, Health, Safety and Environment objectives have been met;
 - 3) process performance and conformity of products and services;
 - 4) the performance of external providers;
 - 5) incidents, nonconformities, corrective actions and continual improvement;
 - 6) monitoring and measurement results;
 - 7) results of evaluation of compliance with legal requirements and other requirements;
 - 8) audit results;
 - 9) consultation and participation of workers;
 - 10) risks and opportunities;
 - 11) Continual Improvement
- e) the adequacy of resources;
- f) the effectiveness of actions taken to address risks and opportunities (see 6.1);
- g) Any relevant information including the accident report and statistics.
- h) Planned changes that could effects the QMS, EMS and OH&S management system
- i) Compliance to applicable legal and other requirements
- j) opportunities for improvement.

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Reference: Procedure for MRM – SFPL /MOP/008

9.3.3 Management Review Outputs

The outputs of the management review will include decisions and actions related to:

- a) opportunities for improvement;
- b) Conclusions on the continuing suitability, adequacy and effectiveness of the QMS, EMS and OH&S management system;
- c) any need for changes to the Integrated Quality, Health, Safety and Environment management system;
- d) resource needs.
- e) Any implications for the strategic direction of the HSE.

Documented information of Management review outputs will be retained as an evidence of the results of management reviews.

Reference: Procedure for MRM – SFPL /MOP/008, Management Review Minutes

10. IMPROVEMENT

10.1 General

SFPL has determined and selected opportunities for improvement and implement any necessary actions to meet customer requirements and enhance customer satisfaction and Health, Safety and Environment Management System. These will include:

- a) Improving products and services to meet requirements as well as to address future needs and expectations;
- b) Correcting, preventing or reducing undesired effects;
- c) Improving the performance and effectiveness of the Integrated Quality, Health, Safety and Environment management system.
- d) QMS, EMS & OH&S Performance
- e) QMS, EMS & OH&S Policy & Objectives
- f) Resources
- g) Other management system requirements

NOTE Examples of improvement can include correction, corrective action, continual improvement, breakthrough change, innovation and re-organization. The input of opportunity for improvement will be reviewed by top management of SFPL as it required by clause 9.3 Management Review of this Integrated Quality, Health, Safety and Environment Manual.

10.2 Nonconformity and corrective action

10.2.1 When nonconformity occurs, including any arising from complaints, the designated personnel will:

- a) react to the nonconformity and, as applicable:
 - 1) take action to control and correct it;
 - 2) deal with the consequences;

b) evaluate the need for action to eliminate the cause(s) of the nonconformity, in order that it does not recur or occur elsewhere, by:

Prepared By		Approved By	
IMS Coordinator		Managing Director	

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- 1) reviewing and analysing the nonconformity;
 - 2) determining the causes of the nonconformity;
 - 3) determining if similar nonconformities exist, or could potentially occur;
- c) implement any action needed;
- d) review the effectiveness of any corrective action taken; e) update risks and opportunities determined during planning, if necessary;
- f) make changes to the Integrated Quality, Health, Safety and Environment management system, if necessary. Corrective actions will be appropriate to the effects of the nonconformities encountered. (Reference: Control Of Non-Conforming Outputs – SFPL / MOP/006, Incident Investigation –SFPL /HSE/007, Corrective Action –SFPL / MOP/007).

Incident investigation (As per OH&S Cl. 10.2)

SFPL has established, implemented and maintained process, including reporting, investigating and taking action, to determine and manage incidents and non-conformities. When an incident or a non-conformity occurs, SFPL will:

- a) react in a timely manner to the incident or nonconformity and, as applicable:
 - 1) take action to control and correct it;
 - 2) deal with the consequences;
- b) evaluate, with the participation of workers (see 5.4) and the involvement of other relevant interested parties, the need for corrective action to eliminate the root cause(s) of the incident non conformity, in order that it does not recur or occur elsewhere, by:
 - 1) investigating the incident or reviewing the nonconformity;
 - 2) determining the cause(s) of the incident or nonconformity;
 - 3) determining if similar incidents have occurred, if nonconformities exist, or if they could potentially occur;
- c) review existing assessments of OH&S risks and other risks, as appropriate;
- d) determine and implement any action needed, including corrective action, in accordance with the hierarchy of controls and the management of change;
- e) assess OH&S risks that relate to new or changed hazards, prior to taking action;
- f) review the effectiveness of any action taken, including corrective action;
- g) make changes to the OH&S management system, if necessary.

Corrective actions will be appropriate to the effects or potential effects of the incidents of nonconformities encountered. SFPL will retain documented information as evidence of:

- the nature of the incidents or nonconformities and any subsequent actions taken;
- the results of any action and corrective action, including their effectiveness.

SFPL will communicate this documented information to relevant workers, and, where they exist, workers' representatives, and other relevant interested parties.

10.2.2 SFPL retain documented information as evidence of:

- a) the nature of the nonconformities and any subsequent actions taken;

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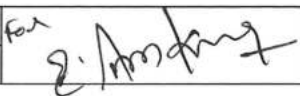

- b) the results of any corrective action. Details of step measures for taking action on nonconformity will follow according to Corrective Action Procedure Information on nonconformities and corrective action will be reviewed by top management of SFPL as it required by clause 9.3 Management Review of this Integrated Quality, Health, Safety and Environment Manual

(Reference: Control Of Non-Conforming Outputs – SFPL / MOP/006, Incident Investigation – SFPL /HSE/007, Corrective Action – SFPL / MOP/007)

10.3 Continual Improvement

SFPL will continually improve the suitability, adequacy and effectiveness of the Integrated Quality, Health, Safety and Environment management system. The consideration will be taken based from following inputs.

- a) Results of analysis and evaluation as defined in clause 9.1.3 Analysis and evaluation of this Integrated Quality, Health, Safety and Environment Manual, and
- b) The outputs from management review as defined in clause 9.3.3 Management Review Outputs Based from inputs from the abovementioned, top management of SFPL has to determine if there are needs or opportunities that will be addressed as part of continual improvement. The input of opportunity for improvement will be reviewed by top management of SFPL as it required by clause 9.3 Management Review of this Integrated Quality, Health, Safety and Environment Manual
- c) enhancing Quality, Health, Safety and Environment performance;
- d) promoting a culture that supports an OH&S management system;
- e) promoting the participation of workers in implementing actions for the continual improvement of the OH&S management system;
- f) communicating the relevant results of continual improvement to workers, and, where they exist, workers' representatives;
- g) maintaining and retaining documented information as evidence of continual improvement.

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