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1.0 PURPOSE:

This Manual defines the Sewon America Rincon Effingham (SARE) Environmental, Health and Safety Management System (EHSMS). It covers the major aspects of an Environmental, Health and Safety Management System as defined by the International Standards Organization (ISO) 45001:2018 and the International Standard Organization (ISO 14001:2015).

The requirements specified in this Environmental, Health and Safety Management System Manual is designed to enable SARE to formulate a policy, targets, objectives and programs taking into account regulatory and other requirements and information about environmental aspects and health and safety hazards. It applies to those aspects and hazards, which SARE can control and which it can be expected to have an influence on the overall Environmental, Health and Safety Management System. It does not state specific environmental, health & safety performance criteria.


SARE’s Environmental, Health and Safety Management System will be referred to as the “Environmental, Health and Safety Management System (EHSMS)” throughout this manual and all other procedures.

Changes to the Environmental, Health and Safety Management System Manual are made as necessary to ensure that SARE’s manual reflects the current Environmental, Health and Safety Management System. These changes are documented in the revision history. In addition, a general review of the manual is conducted periodically.

2.0 SCOPE:

The descriptions stated in this manual are applicable to all operations and processes on the campus of SARE. Sewon America produces automobile parts at its facility located at 1000 Sewon EV Road, Rincon, Georgia, 31326. Production began at the SARE facility in August 2024. The major activities at the site include production of stamped chassis and body components. This manual is applicable to all full time SARE Team Members, Temporaries, Contractors, Suppliers and Visitors on the SARE campus. The scope will be available to interested parties.

Approval	Division	Prepare	Check	Check	Approve
	Name	Raul Meza	Robert Vazquez	Henry Kim	Lucas Lee
	Signature				
	Date				

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This EHSMS manual applies to all environmental, health and safety characteristics of SARE’s activities, and products. Environmental aspects and safety hazards identified are found within the premises, buildings, facilities, and business activities campus. This manual is established to assess the impact on environmental, health and safety based on business activities and to set-up an Environmental, Health and Safety Management System.

When determining the scope of the EHSMS, SARE will consider:

- Internal and external issues affecting the EHS;
- Compliance obligations and requirements;
- Organizational units, functions and physical boundaries;
- Planned or performed work-related activities;
- Activities, products and services;
- Authority and ability to exercise control and influence;

Once the scope is defined, all activities, products and services within the scope will be included in the EHSMS.

3.0 DEFINITIONS:

Acceptable Risk: the risk that has been reduced to a level that can be tolerated by the organization having regard to its legal obligations and its own EHSMS policy.

Audit: systematic, independent and documented process for obtaining “audit evidence” and evaluating it objectively to determine the extent to which “audit criteria” are fulfilled.

Audit Evidence: consists of records, statements of fact or other information which are relevant to the audit criteria and are verifiable, and audit criteria are the set of policies, procedures or requirements used as a reference against audit evidence.

Conformity: fulfilment of a requirement.

Competence: ability to apply knowledge and skills to achieve intended results.

Compliance Obligations: legal requirements and other requirements. Compliance obligations can arise from mandatory requirements, such as applicable laws and regulations, or voluntary commitments.

Consultation: seeking views before making a decision. This includes engaging workers in committees and other EHS activities.

Continual Improvement: reoccurring process of enhancing the Environmental, Health and Safety Management System in order to achieve improvements in overall health and safety performance consistent with the organization's Environmental, Health and Safety Policy.

Contractor: external organization providing services to the organization in accordance with agreed specifications, terms and conditions.

Corrective Action: an action to eliminate the cause of a detected non-conformity and prevent reoccurrence.


Document: information and its supporting medium (paper, document, computer disc, electronic).

Documented information: information required to be controlled and maintained by an organization and the medium on which it is contained.

Effectiveness: extent to which planned activities are realized and planned results achieved.

EHS: Environment, Health and Safety Department.

EHSMS (Environmental, Health and Safety Management System): Part of an organization’s management system used to develop and implement its EHS policy and manage its aspects and hazards. This system includes a set of interrelated elements used to establish policy, objectives, programs and targets to achieve

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those objectives, as well as includes the organizational structure, planning activities (including, for example, a risk assessment and the setting of objectives), responsibilities, practices, procedures, processes and resources. (The Environmental, Health and Safety Management System (EHSMS) is in reference to the ISO 45001:2018 (Safety and Health) and ISO 14001:2015 (Environmental).

EHS Policy: overall intentions and direction of an organization related to its EHSMS performance as formally expressed by top management. The policy provides a framework for action and for the setting of objectives, programs and targets.

EHSMS Performance: measurable results of an organization’s management of its EHSMS aspects and hazards.

EHSMS Representative: the person responsible for facilitating implementation of the EHSMS, and line management retains responsibility for actual performance results. The EHSMS Management Representative will be referred to as the EHSMS Representative.

EHSMS Target: a detailed performance measurement, applicable to the organization or parts thereof, that arises from the environmental and safety objectives, targets and programs and that needs to be set and met to achieve EHSMS objectives.

Environment: surroundings in which an organization operates, including air, water, land, natural resources, flora, humans, and their interrelation.

Environmental Aspect: an element of an organization’s activities, products or services that can interact with the environment.

Environmental Hazard: source, situation, risk or act with a potential for harm in terms of human injury or illness.

Environmental Impact: Change to the environment whether adverse or beneficial, wholly or partially resulting from an organization’s environmental aspects.

Environmental Management System: Part of a management system used to manage environmental aspects, fulfil compliance obligations and address risks and opportunities.

Hazard: source with a potential to cause injury or illness.

Hazard Identification: the process of recognizing that a hazard exists and defining its characteristics.

Hyundai: Hyundai Motor Corporation.

Impact: any change to the performance, whether adverse or beneficial, wholly or partially resulting from an organization's Aspect & Hazard Identification, Risk Assessment & Determining Controls Procedure and EHS Aspect and Hazard Assessment and Summary Sheet.

Incident: work-related event(s) in which an injury or illness (regardless of severity) or fatality occurred, or could have occurred. This may also be referred to as a ‘near-miss’.


Indicator: measurable representation of the condition or status of operations, management or conditions.

Injury and Illness: identifiable, adverse physical or mental or cognitive condition arising from and/or made worse by a work activity and/or work related situation.

ISO: International Standards Organization.

Interested Party: a person or group, inside or outside, concerned with or affected by the EHSMS performance of an organization.

Internal Audit: the systematic, independent, and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the safety management system audit criteria set by the organization are fulfilled.

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HMGMA: Hyundai Motor Group Metaplant America.

Legal and Other Requirements: legal requirements that an organization has to comply with and other requirements that an organization has to or chooses to comply with.

Life Cycle: consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal. The stages include acquisition of raw materials, design, production, transportation, delivery, use, end-of-life treatment and final disposal.

Management System: a set of interrelated elements used to establish policy, objectives, processes, and a method to achieve these objectives. A management system includes organizational structure, planning activities, responsibilities, practices, procedures, processes, and resources.

SARE Management: includes Supervisors, Managers, and Head of Departments (HODs).

SARE Senior Management: includes President, Chief Executive Officer (CEO), Senior Managers, Head of Departments (HODs) and Managers.

Measurement: process to determine a value.

Monitoring: determining the status of a system, a process or an activity.

Non-conformity: non-fulfilment of a requirement.

Objective: an overall EHSMS goal, consistent with the policy, that an organization sets itself to achieve. An objective can be strategic, tactical or operational.

Occupational Health and Safety Management System: Management system used to achieve the EHSMS policy, to prevent injury and illness and to provide a safe and healthy workplace.

Occupational Health and Safety Opportunity: circumstance(s) that can lead to an improvement of OHS performance.

Occupational Health and Safety Risk: combination of the likelihood of occurrence of a work related hazardous event or exposure and the severity of injury and illness that can be caused by the event or exposure.

Organization: company, corporation, person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives.

Outsource: make an arrangement where an external organization performs part of an organization's function or process.

Participation: involvement in decision making.

Performance: measurable results of an organization's management of its EHSMS aspects and hazards.

Pollution Prevention: use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts.

Procedure: specified way to carry out an activity or a process.

Process: set of interrelated or interacting activities which transform inputs into outputs.


Preventive Action: action to eliminate the cause of a potential non-conformity.

Record: a document stating results achieved or providing evidence of activities performed.

Requirement: need or expectation that is stated, generally implies or obligatory.

Risk: effect of uncertainty which could be a likelihood or consequence. Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or illness, or pollution that can be caused by the event or exposure(s).

Risks and Opportunities: potential adverse effects (threats) and potential beneficial effects (opportunities).

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Risk Assessment: process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable.

SOP/WS: Standard Operating Procedure or Work Standard - is a step by step instruction for completing a specific production-related task.

Top Management: person or group of people who directs and controls an organization at the highest level that has the power to delegate authority and provide resources within the organization.

Worker: person performing work or work-related activities that are under the control of the organization.

Workplace: any physical location in which work related activities are performed under the control of the organization.

4.0 EHSMS MANAGEMENT SYSTEM ELEMENTS:

4.1 GENERAL REQUIREMENTS:

The establishment of this EHSMS will guide SARE in development of such principles and procedures as to integrate the business aspects of the facility with the environmental, health and safety considerations for its operation. To do this, an integrated approach with other comprehensive system standards will allow for increased efficiency during development and implementation of this standard across the whole facility and its operations. This will allow for the greatest positive benefit to the Team Members and business operations over time. The system will allow for the immediate prioritization of those environmental aspects and safety hazards of the business to be identified and design how business operations will engage in the control and potential improvement of EHS performance. Programs, objectives and targets will be designed to look at effective use of business resources based on the reasonable availability, planning, control and monitoring for the actions that impact the aspects and hazards that are identified. This is critical to the compliance and appropriateness of the system.


Identify and Determine the Context Procedure- SAQM-OP-0034

Context-Internal and External Issues- SAQM-FRM-0332

5.0 LEADERSHIP, COMMITMENT AND WORKER PARTICIPATION:

Top management will demonstrate leadership, commitment and worker participation with respect to the EHSMS including awareness, responsiveness, active support and feedback by:

- Taking accountability for the effectiveness of the EHSMS;
- Ensuring that the policy and objectives are established and compatible with strategic direction and context of SARE;
- Ensuring the integration of the EHSMS into the SARE’s business practices;
- Ensuring the resources are available to implement the EHSMS;
- Communicating and conforming to the requirements of the EHSMS;
- Ensuring that objectives are tracked, maintained and achieved;
- Directing and supporting people to contribute to the effectiveness of the EHSMS;
- Promoting continuous improvement;
- Supporting other relevant management roles to demonstrate leadership as it applies to their area;

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- Supporting a culture of individual and group values, attitudes, management practices, perceptions, competencies and patterns of activities that determine commitment of the EHSMS.

5.1 EHSMS POLICY:

The policy sets the commitment and framework for long-term direction and support to continually improve the EHSMS. SARE will follow all applicable environmental, health and safety regulations and other corporate driven regulations and strive to reduce and/or eliminate environmental impacts and injuries or illnesses. SARE recognizes its fundamental obligation to its team members and the local community to operate and continually improve its EHSMS and reduce its impact to the environment and injuries to workers.

The SARE’s EHSMS policy will be approved and reviewed with the Senior Management. The policy will be communicated to all SARE Team Members, temporaries, contractors, suppliers and visitors. When establishing the objectives, programs and targets, the EHSMS policy is taken into consideration to ensure consistency. The EHSMS policy will be posted in key areas of SARE and available upon request of interested parties. The EHSMS policy will be reviewed periodically or when major changes occur.

Reference:

SARE Environmental, Health and Safety Policy Statement (SAEM-P-000)

5.2 ORGANIZATIONAL ROLES, RESPONSIBILITIES AND AUTHORITIES:

The purpose of this section is to define the structure and responsibility of each area in order to facilitate an effective EHSMS, as well as ensuring every person at SARE takes accountability for their own pollution prevention, safety and health as well as those around them. SARE Management shall provide resources essential to the implementation and control of the EHSMS. This may include human resources and other specialized skills, technology and financial resources. Top management is accountable for having responsibility if something is not done, does not work or fails to achieve its objectives. Roles and responsibilities ensure conformity to requirements of the ISO systems and reporting EHSMS performance to top management.

Reference:

MBO

Job Descriptions

5.3 CONSULTATION AND PARTICIPATION OF WORKERS:


Consultation commits two-way communication involving dialogue and exchanges of information. This creates involvement from all levels with informed feedback before decisions are made. Participation enables workers to contribute to decision-making processes on EHSMS performance and changes. All team members, visitors, contractors at all levels are encouraged to report hazardous situations so preventative actions can be implemented.

Reference:

Roles, Responsibility and Authority Procedure (SAQM-OP-0041)

Organizational chart

Job descriptions

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6.0 PLANNING:

Planning is an on-going process, anticipating changing circumstances and continually determining risks and opportunities. Environmental, Health and Safety Planning is the responsibility of the EHS Department. The EHS Manager is the EHSMS Representative designated as the ISO 45001 and ISO 14001 representative. The EHSMS representative is responsible for the following:

- Maintaining the EHSMS and all core policies and procedures;
- Establishing and maintaining the Environmental Aspect & Safety Hazard Assessment and Summary Sheet;
- Developing the annual proposed Objectives, Targets and Programs;
- Identifying all environmental, health and safety “Legal and Other Requirements”;
- Developing an annual EHS Activity Plan;
- Coordinating Internal EHSMS audits;
- Conducting compliance evaluations;
- Continually assessing risks and opportunities for EHSMS;
- Reporting EHSMS and Compliance status to Senior Management (Management Review).

6.1 RISKS AND OPPORTUNITIES:

The identification of risks and opportunities are continuous with interaction of all people in the organization. The opportunities address the identification of environmental aspects as well as safety hazards, how they are communicated, the analysis and mitigation of the known hazards.


Examples of opportunities to improve EHSMS are:

- New or changing regulations;
- Emergency situations;
- Inspection and auditing;
- Job hazard analysis;
- Ergonomic assessments;
- Permits to work and other control methods;
- Injury/incident investigations and corrective actions;
- Equipment acceptance of new and modified equipment;
- Process, part or equipment design specifications;
- New technology;
- Behavior based programs;
- Worker participation and consultation;
- Benchmarking;
- Attending safety conferences, forums, council meetings

Each risk and opportunity will have an objective to ensure compliance and tracking.

6.2 ENVIRONMENTAL ASPECT & HAZARD IDENTIFICATION AND ASSESSMENT OF RISKS AND OPPORTUNITIES:

SARE maintains documented procedures that govern the identification, assessment and control of environmental aspects and health and safety hazards. These are identified characteristics of activities, products

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or services that may interact with environmental, health and safety performance and compliance that SARE can control, influence and consider as part of a life cycle perspective. Aspect and hazard identification helps SARE recognize the hazards and risks, assess, prioritize and eliminate or reduce the impact or hazards. Hazards can be physical, chemical, biological, psychosocial, mechanical, and electrical or based on movement and energy.

The procedure for environmental aspects and health and safety hazard identification and risk assessment takes into account:


- Routine, non-routine, normal day-day activities planned or unplanned;
- Activities of all persons having access to the workplace (including SARE Team Members, temporaries, contractors, suppliers and visitors);
- Human behavior, capabilities, and other human factors;
- Tools, machines, systems, activities and environment for safe use;
- Should address three aspects being: the activity, the worker and the organization, how they interact and the impact on EHSMS;
- Potential emergency situations, unplanned, unscheduled that need an immediate response or urgent evacuation;
- Identified environmental aspects and health and safety hazards originating outside the workplace capable of adversely affecting the environmental, health and safety of persons or environment, under the control of the organization within the workplace;
- Aspects and hazards created in the vicinity of the workplace by work-related activities under the control of the organization;
- Infrastructure, equipment, and materials at the workplace, whether provided by the organization or others;
- Changes or proposed changes in the organization, its activities or materials;
- Modifications to the EHSMS, including temporary changes, their impacts on operations, processes and activities;
- Any applicable legal obligations, relating to aspect, hazards, risk assessment and implementation of necessary controls;
- The design of work areas, processes, installations, machinery/equipment, operating procedures, and work organization, including their adaptation to human capabilities.
- Changes in knowledge of, and information about, hazards.
- Abnormal conditions

The methodology used to identify environmental aspects and safety hazards and assess risks is documented in a procedure.

When determining controls, or considering changes to existing controls, consideration will be given to reducing the risks according to the following hierarchy:

- Elimination;
- Substitution;
- Engineering controls;
- Signage/warnings and/or administrative controls;
- Personal protective equipment (PPE).

Each risk and opportunity will have an objective assigned.

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Reference:

Environmental Aspects and Safety Hazard Identification, Risk Assessment and Determining Controls Procedure (SASM-028)

RISK MANAGEMENT PROCEDURE (SAQM-OP-0031)

Environmental Aspect, Safety Hazard Assessment and Summary Sheet (SAEM-F-301)

6.3 LEGAL AND OTHER REQUIREMENTS/COMPLIANCE OBLIGATIONS:

SARE maintains access to all legal and other requirements. The EHSMS Representative is responsible for reviewing all regulations including keeping up-to-date with new or changing regulations and determining applicability to SARE. These regulations will be translated into an annual EHS Activity Plan to address activities necessary to meet environmental, health and safety compliance including:

- Federal: All applicable regulations of the Federal Occupational Safety & Health Administration.
All applicable regulations of the US Environmental Protection Agency.
- State: All applicable regulations of Georgia.
- Local: All Effingham County applicable regulations.

Other requirements may include but not limited to the following:

- Mandates by Hyundai Motors.
- Voluntary commitments to local authorities or organizations.
- Internal objectives mandated by SARE Senior Management.

A regulatory review form will be maintained by the EHSMS representative of applicability of new or changing regulations and implementation if applicable into SARE EHSMS.

Reference:

EHS Activity Plan (SAEM-P-004)

Legal and Other Requirements Procedure (SAEM-P-005)


Legal & Other Requirements Applicability Spreadsheet (SAEM-F-302)

Regulatory Review Form (SAEM-F-302)

6.4 OBJECTIVES AND PROGRAMS:

SARE has established and maintains documented procedures to identify environmental, health and safety objectives and programs. The objectives and programs are linked to the risks and opportunities and performance criteria. The objectives shall be:

- Consistent with the policy;
- Measurable (where practicable);
- Monitored;
- Communicated;
- Updated as appropriate

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SARE establishes and maintains guidelines in developing objectives and programs at all relevant functions and activities. These objectives and programs are based on measurable results to determine if the goal has been achieved. The measurement can be either qualitative or quantitative. Qualitative measures can be approximations, such as interviews, surveys and observations. SARE does not have to set objectives for every risk and opportunity it determines.

SARE considers the legal and other requirements, its environmental aspects and safety hazards, including the commitment to provide a healthy and safe workplace, prevent pollution, change management, its technological options, its financial, operational and business requirements and the views of interested parties when establishing objectives and programs.

Objectives and programs can be integrated with other business objectives and be strategic, tactical or operational;

- Strategic objectives can be set to improve the overall performance of the EHSMS;
- Tactical objectives can be set at facility, project or process level;
- Operational objectives can be set at the activity level.

SARE establishes and maintains documents for achieving its objectives and programs including:

- Designation of responsibilities tasked to achieve any specific objectives and programs for each relevant function at all levels of the organization;
- Resources and means for the accomplishment of the objectives and programs;
- The time frame by which they are to be achieved;
- What will be done, what resources are required;
- How the results will be evaluated.

Reference:

Environmental Aspects, Safety Hazard Identification, Assessment and Determining Controls Procedure (SAEM-P-003)

Environmental Aspects and Safety Hazard Assessment & Summary Sheet (SAEM-F-301)

Legal and Other Requirements Procedure (SAEM-P-005)

Objectives and Programs Procedure (SAEM-P-006)

Improvement Program Form (SAEM-F-304)

EH&S Improvement Form (SAEM-F-0061)


7.0 SUPPORT:

7.1 RESOURCES:

The purpose of this section is to determine the resources to be provided for the establishment, implementation, maintenance and continuous improvement of the EHSMS. This may include human, infrastructure, technology and financial as well as buildings, plant, equipment, utilities, information technology, communication systems and emergency containment systems.

7.2 COMPETENCE:

The competence of workers should include the knowledge and skills necessary to perform their jobs and also identify aspects and hazards associated with the work and workplace.

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SARE will:

- Determine the necessary competence of person(s) doing work under its control that affects its environmental, health and safety performance and its ability to fulfill its compliance obligations;
- Ensure that these persons are competent on the basis of appropriate education, qualification, training, retraining or experience necessary to maintain competence;
- Determine training needs associated with environmental aspects and health and safety hazards;
- Take actions to acquire the necessary competence and evaluate the effectiveness of the actions taken.
- Take into account the work environment, requirements of the EHSMS system, legal and other requirements, the EHS policy, preventative and control measures from the risk assessment;
- Potential consequences of compliance and noncompliance, including the impact on worker health and safety;
- Value of participation based on knowledge and skill;
- Duties and responsibilities associated with the roles;
- Individual capabilities, including experience, language skills, literacy and diversity;
- Relevant updating of change management.
- Worker training on relevant aspects, hazards and risks associated with their work tasks and competence to remove themselves from situations of imminent and serious danger.

The EHSMS Representative will develop a Training Matrix to identify needs at SARE for competence and maintain documentation for updates and change management.

7.3 AWARENESS:

SARE will ensure that workers are aware of:

- Environmental, health and safety risks which they are exposed to;
- Significant environmental aspects and impacts;
- The EHS policy;
- Their contribution to the effectiveness of the EHSMS and benefits of EHS performance;
- The implications of not conforming to the EHSMS requirements and obligations.

Reference:


Training Matrix (SAQM-FRM-0303)

Training Plan Procedure (SAQM-OP-0040)

7.4 COMMUNICATION:

Communication should provide for the gathering, updating and dissemination of information. SARE should ensure that relevant information is provided, is received and is understandable to all workers and interested parties.

SARE has procedures for communication to both internal and external interested parties. These procedures include the following:

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- Internal communication between various levels and functions of the SARE organization.
- Receiving, documenting and responding to relevant communication from both internal and external interested parties regarding our EHSMS, environmental aspects and safety hazards.
- External communication of significant environmental aspects and safety hazards will be communicated only to Kia, Hyundai and other requests will be determined by SARE on a “case by case” basis.

INTERNAL COMMUNICATION:

Internal communication includes:

- Meetings, briefings and presentations;
- Meeting minutes, memos, letters and notes;
- Telephone or e-mail;
- Regulatory documents;
- Internal health and safety audit reports;
- Management Reviews;

EXTERNAL COMMUNICATION:

External communication includes:

- Single point of contact;
- Security Log;
- Maintain a log book to record any concerns received;
- Telephone or personal contact, letters and facsimile transmissions;
- Regulatory documents;
- OSHA and GEPD public records;
- Internal health and safety audit findings reports;
- Periodic inquiries from interested parties (i.e. City of Rincon, Effingham County, Georgia.)

Reference:

Communication, Participation and Consultation Procedure
Observation Form
EHS Issue Summary Form (SAEM-F-309)
Internal/External Communication (SASM-P-0101)


7.5 DOCUMENTATION:

The purpose of this document is to establish and maintain an environment, health and safety management documentation system, in paper or electronic form;

- To describe the core elements of the EHSMS and their interaction;
- To provide direction to related documentation.

SARE will maintain up-to-date documentation that is sufficient to ensure that the EHSMS can be adequately understood and effectively operated.

Documentation includes:

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- EHSMS policy and objectives;
- Scope of the EHSMS;
- Description of the main elements of the EHSMS, their interaction and reference to related documents;
- Documents required by EHSMS;
- Documents to ensure the effective planning, operation and control of processes that relate to EHSMS.

Documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner and retained for a specified period. Procedures and responsibilities are established and maintained concerning the modification of the various types of documents.

Reference:

SARE Environmental, Health and Safety Policy Statement (SAEM-P-000)
Improvement Program Form (SAEM-F-304)

7.6 CONTROL OF DOCUMENTS:

All documents and data containing information required for the operation of the EHSMS and performance should be identified and controlled.

Control of documents includes:

- Establishment, implementation, and maintenance procedure for:
 - ✓ Document approval;
 - ✓ Review and updates;
 - ✓ Changes and revisions;
 - ✓ Various versions are identified;
 - ✓ Legibility and identifiable;
 - ✓ Availability;
 - ✓ Distribution (Internal and External);
 - ✓ Prevention of unintended use.


Reference:

Documents Control Procedure (SAQM-OP-0012)
Record Retention Procedure (SAQM-OP-0013)

7.7 CONTROL OF RECORDS:

The EHSMS Representative maintains a list of required records and their retention time.

- These records shall include training records and the results of audits and reviews.
- Environmental, health and safety records are maintained to demonstrate conformance to specified federal, state and local regulatory requirements and the effective operation of the EHSMS system.
- All environmental, health and safety records are legible and are stored and retained in such a way that they are readily retrievable in facilities that provide a suitable environment to prevent damage or deterioration and to prevent loss.

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- Retention times for federal, state and local regulatory requirements establish environmental, health and safety records.
- Environmental, health and safety records are available for evaluation by internal and external interested parties.
- Records can be in the form of any type of media, such as hard copy or electronic.
- Electronically obsolete documents will be archived.
- Hard copy obsolete documents will be destroyed.

Reference:

Documents Control Procedure (SAQM-OP-0012)
Record Retention Procedure (SAQM-OP-0013)

8.0 OPERATIONAL CONTROL:

SARE has established, planned, implemented, controlled and maintained a process to meet the requirements of the EHSMS and implemented actions required by:

- Establishing operating criteria for the processes;
- Implemented controls, considering life cycle stages;
- Determined EHS requirements for the procurement of products and services;
- Communicate relevant EHS requirements to external providers and contractors;
- Provide information about significant EHS impacts associated with transportation, delivery, end-of-life treatment and final disposal to management review
- Maintained documentation
- Adapt worker to the work;
- Ensured that outsourced processes are controlled by quality standards

Operational controls have been identified for key characteristics of various operational stages of SARE’s facility including engineering, contracting, purchasing and storing any material or process that may have safety hazards.

SARE has established and maintains a documented procedure on the method to develop the plan, schedule and tracking of the operational controls.

Reference:


Improvement Program Form (SAEM-F-304)
Process Management Procedure (SAQM-OP-0046)

Environmental Aspect and Safety Hazard Identification, Risk Assessment and Determining Controls Procedure (SAEM-028)

8.1 IMPACTS AND RISKS:

SARE has established, implemented and maintains a process for the elimination of hazards and reduction of significant impacts and risks using hierarchy of control as a base:

- Eliminate the hazard;

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- Substitute with less hazardous processes, operations, materials or equipment;
- Use engineering controls and reorganization of work;
- Use administrative controls, including training, use adequate personal protective equipment and requirements to wear it.

Environmental Aspect and Safety Hazard Identification, Risk Assessment and Determining Controls Procedure (SAEM-P-003)

8.2 MANAGEMENT OF CHANGE:

SARE has developed and implemented a procedure for change point management. This includes any temporary and permanent change including:

- New products, services and processes or changes to existing products, services and processes, including
 - ✓ Workplace surroundings and locations;
 - ✓ Work organization;
 - ✓ Working conditions;
 - ✓ Equipment;
 - ✓ Work force.
- Changes to the legal and other requirements;
- Changes in knowledge or information about aspects and hazards;
- Developments in knowledge and technology
 - Environmental Aspect and Safety Hazard Identification, Risk Assessment and Determining Controls Procedure (SAEM-P-003)

SARE completes a checklist and approval form for any/all changes and implement actions where issues are found.

8.3 PROCUREMENT:


SARE has established, implemented and maintained a procedure to control the procurement of products and services to ensure conformity to the ESHS.

A contractor’s brochure is distributed and all contractors must submit to a pre-approval process and attend an awareness introduction class. Project contractors must complete a job hazard analysis prior to days’ work to EHS.

All visitors must read and sign a document before accessing any plant area.

Outsourced products and services are agreed upon with purchasing and a service contract is signed by both parties and quality checks are maintained and documented.

Onsite Contractor Control (SASM -040)
Contractor Method Statement (SAEM-042)

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Contractor Work Permission (SASM-0200)

8.4 EMERGENCY PREPAREDNESS AND RESPONSE:

SARE has established and maintains procedures to identify the potential for, response to accidents and emergency situations, and for preventing and mitigating the environmental aspects and safety hazards that may be associated with those impacts.

- SARE periodically reviews and revises, when necessary, the emergency preparedness and response procedures, particularly after the occurrence of incidents or emergency situations.
- SARE periodically tests those procedures through documented training and/or drills.

Reference:

Emergency Response (SAQM-OP-0050)
Emergency Preparedness and Response Procedure (SASM-005)
Accident Investigation Report (SAEM-F-011)

9.0 PERFORMANCE, MEASUREMENT & MONITORING:

SARE has established and maintains documented procedures to track progress towards EHSMS objectives, and programs. Monthly injury report summary is reviewed by senior management. SARE monitors, measures, analyzes and evaluates the EHS performance. Monitoring equipment shall be calibrated and maintained. Records of this process shall be retained according to procedures. Monthly reports are discussed to track environmental, health and safety performance.

Reference:

Progress Report (SAEM-F-305)
EHS Activity Plan (SAEM-P-004)
Performance, Measurement and Monitoring Procedure (SAEM-P-011)
Monthly EHS Performance Report (Powerpoint Presentation)
Calibration records (N/A)


9.1 EVALUATION OF COMPLIANCE:

SARE has established and maintains procedures to periodically evaluate compliance with applicable legal and other requirements to which it subscribes and that are applicable to the environmental aspects and health and safety hazards of SARE activities and products.

The EHSMS Representative will ensure that records are retained for the results of the periodic evaluations and will ensure that those assigned to conduct incident investigations are competent. The EHSMS Representative will ensure that compliance is reviewed periodically.

Reference:

EHS Activity Plan (SAEM-P-004)
Evaluation of Compliance Procedure (SAEM-P-012)
Monthly monitoring report

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Monthly safety meeting report
Legal and Other Requirements (SAEM-P-005)
Legal and Other Requirements Applicability Spreadsheet (SAEM-F-302)

9.2 INTERNAL AUDIT:

SARE has established and maintains an EHSMS audit program to carry out periodic Environmental, Health and Safety Management System audits:

- Internal EHSMS audits will be conducted according to the schedule in the EHS Activity Plan.

The EHSMS Representative is responsible for ensuring the following:

- Internal audits are conducted according to the EHS Activity Plan.
- Use of trained auditors to conduct audits. SARE approval of 3rd party auditor to conduct internal audits.
- All clauses of the standard will be reviewed. All buildings, all departments and all areas will be audited.

Reference:

Internal Audit Procedure (SAEM-P-013)
Internal audit plan
Internal audit report
Internal audit checklist
EHS Activity Plan (SAEM-P-006)

9.3 MANAGEMENT REVIEW:


SARE’s Senior Management periodically reviews the EHSMS to ensure continuing suitability, adequacy and effectiveness.

- The EHSMS Representative ensures that the necessary information is collected to allow Senior Management to carry out its evaluation.
- The EHSMS Representative will share where injury investigation corrective action or TM consultation results have or have not been corrected.
- The EHSMS Representative will ensure that this review is documented and feedback is gathered for issues and comments about the EHSMS system.
- The Senior Management review will address the possible need for changes in policy, objectives and other elements of the EHSMS in light of audit reviews, changing circumstances and the commitment to continual improvement.

SARE Senior Management reviews the EHSMS at a minimum of once per year to ensure continuing suitability and effectiveness in satisfying the requirements of the ISO 14001:2015 & 45001:2018 Standards, and SARE’s Health and Safety policy and objectives. Management Review records are maintained by the EHSMS Representative.

Reference:

Management Review Procedure (SAQM-OP-0011)

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Management review report.

10.0 IMPROVEMENT:

SARE has determined opportunities for improvement in the EHSMS and develops programs and implements actions to achieve continuous improvement in the EHSMS.

10.1 INCIDENT INVESTIGATION, NONCONFORMITY, CORRECTIVE ACTION AND PREVENTIVE ACTION:

SARE has established and maintains documented procedures for defining responsibility and authority for handling and investigating EHSMS non-conformance, taking action to mitigate any impacts and for initiating and completing corrective and preventive action.

- Any corrective or preventive action taken to eliminate the causes of actual and potential EHSMS non-conformance shall be appropriate to the magnitude of the problems. SARE will implement and record any changes in the documented procedures from non-conformance, corrective and preventive action.

10.2 INCIDENT INVESTIGATION:

SARE has established implemented, and maintains a procedure to record, investigate and analyze incidents to:

- Determine underlying deficiencies, and other factors that might be causing or contributing to the occurrence of incidents;
- Identify the need for corrective action;
- Identify opportunities for preventive action;
- Identify opportunities for continuous improvement;
- Communicate the results of investigations;

The investigations shall be performed in a timely manner with any identified need for corrective or preventive action dealt with in accordance with existing procedures, documented and maintained.


Reference:

Incident Investigation, Nonconformity, Corrective & Preventive Action Procedure (SAEM-P-015)
Accident Investigation Report (SAEM-F-311)

10.3 CONFORMITY, CORRECTIVE ACTION AND PREVENTIVE ACTION:

SARE will control the effective handling of external and internal interested party complaints and reports of EHSMS non-conformity. The EHS department shall:

- Investigate the cause of the EHSMS non-conformity relating to process, environmental aspects, and health and safety hazards to the EHSMS or other cause and recording the results of the investigation;
- Determine the corrective action needed to eliminate the cause of the non-conformity;
- Properly review and submit controls to ensure that corrective action is taken and is effective;
- Submit corrective and preventive action will identify new and changed hazards and impacts or the need for new or changed controls;
- Propose actions through a risk assessment prior to the start of a new process;

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- Ensure corrective and preventive action taken will be appropriate to the magnitude of problems;
- Ensure changes arising from corrective and preventive action will be made to the EHSMS documentation;
- Ensure the use of appropriate sources of information such as processes and work operations which will affect the environmental, health and safety non-conformance, audit results, environmental, health and safety records, internal and external interested party complaints, to detect, analyze and eliminate potential causes of the non-conformity.
- Lead the determination of the steps needed to deal with any problems requiring preventive action.
- Review the initiation and implementation of preventive action and application of controls to ensure that it is effective.
- Ensure that relevant information on actions taken is submitted for management review.

Reference:

Accident Incident Investigation Procedure (SASEM-P-019)
Corrective Action and Preventive Procedure (SAQM-OP-0010)
Accident Investigation Report (SASEM-F-011)
EH&S Site Audit Form (SAEM F-318)

10.4 CONTINUOUS IMPROVEMENT:

SARE has programs in place for continuous improvement to improve the suitability, adequacy and effectiveness of the EHSMS by:

- Enhancing EHS performance;
- Promoting a positive culture for EHSMS;
- Promotes participation of workers in implementing actions
- Communicates results of continuous improvement to workers and management;
- Maintains documentation of continuous improvement.

EH&S risk program (SASM-028)

11.0 ASSOCIATED DOCUMENTS:

ISO 14001:2015 Standard
ISO 45001:2018 Standard

12.0 REVISION LOG:

Level 01 – Document creation