



# Quality Policy UK

## Scope of application

This Policy is applicable to all employees, managers and members of the governing bodies of URBASER S.A., its subsidiaries and holdings/joint ventures in which URBASER is the majority shareholder / partner or where control is held by URBASER's management ("URBASER" or "the Company"). It is the responsibility of all URBASER employees to act professionally and protect the Company's reputation.

## Contents

Policy

A handwritten signature in blue ink, appearing to read "Javier Peiro", is positioned above the printed name and title.

**Javier Peiro**  
**Managing Director**

Cheltenham, GL53 7JT

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## Introduction

Urbaser began its activity in 1990 to provide value-added services to municipalities and local authorities in waste and environmental matters.

Over the next decade, the Company was strengthened by setting up specialized subsidiaries to cover the full spectrum of environmental services. Urbaser continued its process of national consolidation and diversification thanks, among other things, to the complete acquisition of Sertego, a division dedicated to the integral management of industrial waste. In recent years, there has also been an expansion in the commitment to R&D&I projects in the field of renewable energies.

Internationally, since 2009, the Company has been expanding thanks to the incorporation of companies in Mexico, France, Bahrain, Oman and India, among other countries. Since December 2016, Urbaser belongs to Firion Investments, in what represents the final push in the Company's international expansion phase, placing it among the world's leading environmental companies.

Today Urbaser has 659 million euros in resources, with more than 11 million tonnes of treated waste and more than 1,400 Gwh of electricity generated. We have a presence in 21 countries on four continents. Urbaser is a worldwide company, a network of more than 40,000 people dedicated to improving the living conditions of citizens all over the globe. Collection, management, treatment and recovery of waste, for conversion into resources. We guarantee access to basic natural resources such as water and minimise the environmental impact of human progress.

Our business strategy is underpinned by three objectives. Delivering on our objectives ensures that, as our business grows, we respond better to new demands whilst observing our ethical principles and our ongoing commitment to do business in a fair and sustainable way.

Urbaser Ltd was incorporated in 1998 in the UK and has been providing environmental services since then. Across the UK, Urbaser Ltd provides services to nearly 4 million residents, employs over 700 staff and handles more than 1 million tonnes of waste and recycling. We work closely with our customers to ensure that their waste is being managed and their services are being delivered in the correct way.

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# 1. General requirements

Urbaser Limited developed and implemented a Local (UK) Integrated Management System in order to enable the company to: document its best business practices, identify the context within the company operates, better satisfy the requirements and expectations of its clients, identify all internal and external issues affecting the company, identifying all the risks and opportunities and finally improve the overall management of the company by promoting strong Leadership. The Quality Management System of Urbaser Limited meets the requirements of the international standards BS EN ISO 9001:2015. This policy describes the Quality Management System, delineates authorities, interrelationships and responsibilities of the personnel performing within the system. The policy also provides procedures or references for all activities comprising the Integrated Management System to ensure compliance of the necessary requirements of the standard. This policy is used internally to guide the company's employees through the various requirements of the ISO standard that must be met and maintained in order to ensure customer satisfaction, stakeholder's awareness, continuous improvement and provide the necessary instructions that create an empowered work force. This policy is used externally to introduce our Quality Management System to our customers and other external organisations or individuals. The policy is also used to familiarise with the controls that have been implemented and to assure them that the integrity of the Integrated Management System is maintained and focused on customer satisfaction and continuous improvement. Urbaser Limited will maintain and continually improve its quality system in accordance with the requirements of the ISO 9001:2015, standard and will update its scope in case of any change of the services provided. Process Approach Methodologies have been applied to design our Integrated Management System. The approach was based upon the **Deming Shewhart** cycle of: **PLAN-DO-CHECK-ACT**. The steps Urbaser took in designing the system were the following: Purpose of the organisation, determine the processes of the organisation, determine the sequence of processes, define process ownership, define process documentation, define the monitoring and measurement required, define the resource need, and verify the process against its planned objectives. ISO 9001:2015.

# 2. Purpose & scope

This Quality Policy is part of the Corporate Management Manual of Integrated Management System (IMS) issued on the 28/02/2022. This policy ought to be the local/country extension of the Corporate Management Manual of Integrated Management System (IMS) and should be consulted in combination with the stated. This policy describes the Quality Management System. It refers to the organisation's policies and describes how these are implemented and sustained throughout the organisation. The system core elements are described with reference to key organisational procedures. The bespoke integrated system will enhance performance and customer satisfaction through the effective application of its policies and procedures, by constantly providing services that meet and exceed customer requirements, controlling risks, minimising environmental impact of its operations and continually improving processes and operations in order to meet customer expectations at all times as well its statutory and legal requirements. All Companies/Joint Venture shall perform an analysis of the applicability of the IMS requirements, considering internal and external issues, requirements of its stakeholders and services provided. It may consider, with justification, certain IMS requirements as not applicable, leaving documented evidence of this analysis in the **MM-01-CORP-D01-Organizational Context and Stakeholder**.

The Policy aims to achieve the intended outcome of its quality management system. To this and this document includes:

- Urbaser's statement of continual improvement of its performances;
- Urbaser commitment to fulfil its legal and other requirements; and
- Urbaser achievements of its pre-set yearly quality objectives.

This policy also highlights within it section procedural instructions for:

- Determination of professional competence and coordination of training action
- Procedure of monitoring and measurement (including methodology)
- Procedure for customer satisfaction evaluation

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To allow a better understanding of the Organization and the specific scope of the IMS, the **Company QHSE Director** must complete the records associated with this policy, which are as follows, before starting to implement the IMS:

- **MM-01-CORP-D01-Organizational Context and Stakeholders:** brief presentation of the Company implementing the IMS, as well as a description of the internal and external context, and of the needs and expectations of stakeholders, which helps to understand the profile of the Company and its activities in greater depth.

At the corporate level, the **Corporate QHSE Director** will prepare the following record:

- **MM-01-CORP-D02-Scope of application:** containing the perimeter of all the countries/companies/centres included in the IMS, and the reference standards implemented in each case.

The Local UK- Quality Management System applies to all UK Urbaser Limited's services activities. This document forms the core of the company ethos and *modus operandi* for present and future endeavours.

Urbaser Limited provides the following services:

- Manual and Mechanical street cleaning for highways and other designated areas
- Refuse collection
- Grounds Maintenance
- Recycling and other Wastes Collection
- Graffiti removal
- Waste Treatment

The Urbaser Limited headquarters are based at the following address:

**First Floor, Westmoreland House  
80 – 86 Bath Road  
Cheltenham, GL53 7JT**

### 3. Normative of Reference and Definitions

#### 3.1 Normative Reference

- BSI BN ISO 9001:2015.
- BSI BN ISO 9000:2015 Fundamentals and vocabulary.

#### 3.2 Definitions

The terms and descriptions used in this policy are generally defined within ISO 9001:2015, BS Systems.

### 4. The context of the organisation

Urbaser Limited is committed in defining our position in the marketplace. Analysing relevant factors arising from legal, political, economic social and technological issues influence our strategic direction and organisational

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context has aided in identifying all the external and internal issues that are relevant to the purpose of such activities. We analyse, monitor and review all the factors that may affect our ability to satisfy legal and statutory requirement whilst safeguarding the environment.

The Company has grouped all the environmental conditions and factors that may affect the business or be affected by its undertaking to achieve the desired outcome of protecting the environment and identifying new opportunities. Urbaser Limited has reviewed and analysed key aspects of itself and its stakeholders to determine the strategic direction of the company. This involves:

- Understanding our core and scope of management system (see 4.2 below).
- Identifying “interested parties” (stakeholders) who receive our services and have a significant interest in our company. These parties are identified in the document
- Understanding internal and external issues that are of concern to clients and their interested parties; also identified in the document

This information is then used by Top Management to determine the company’s strategic direction. This is defined in records of management review and periodically updated as conditions and situations change.

**4.1. Scope of the Management System & Scope Statement**

Based on an analysis of the above issues, interests of stakeholders and in consideration of its Services; Urbaser Limited has determined the scope of the management system as follows:

***The purpose of Urbaser Limited’s Quality system is to ensure the quality of its services continue to meet the highest standard demanded by the organisation and expected by its customers to ensure that Urbaser Limited’s processes and services are carried out in a responsible manner.***

**4.2 Facilities within the scopeThe quality system applies to all processes, activities and employees of the following locations within the company:**

- Head Office
- London Borough of Waltham Forest
- Burnley
- Gosport
- St. Albans
- Windsor and Maidenhead
- Dartford
- Gloucestershire EfW
- North and East Hertfordshire
- Southwest Kent
- Wokingham
- Welwyn Garden City
- J&B working as part of Urbaser (with Corporate Policies being dictated from Urbaser and Local procedure implementing the Urbaser’ certified system
- Sixfields (Northampton) HWRC (Main Office) , Walter Tull Way, Weedon Road, Northampton.
- Kettering HWRC- Garrard Way, Telford Way Industrial Estate, Kettering.
- Wellingborough HWRC-Paterson Road, on Finedon Road Industrial Estate, Wellingborough.
- Rushden HWRC-Northampton Road, East of Sanders Londge on old A45 Road, Rushden.
- Ecton Lane (Northampton) HWRC-Lower Ecton Lane, Great Billing, Northampton.
- Brixworth HWRC - Scaldwell Road, Brixworth.
- Daventry HWRC-Browns Road, Off Staverton Road, Daventry.

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- Towcester HWRC-Old Greens, Norton Road, Towcester.
- Corby HWRC-Kettering Road, Corby.
- Eden (Penrith)- Main Office-The Depot, Old London Road, Penrith, Cumbria.
- J&B - Windermere Road, Hartlepool, Middlesbrough.
- J&B -Monument Park, Washington, Sunderland.
- J&BDockside Road, Middlesbrough, South Tees.
- J&B-Baltic Street, Hartlepool, Middlesbrough.
- Thorn Turn HWRC, Grendall Lane, Houghton Regis.
- Leighton Buzzard HWRC, Shenley Hill Rd, Leighton Buzzard.
- Biggleswade HWRC, Bells Brook, Lane, Biggleswade.
- Ampthill HWRC, Abbey Ln, Ampthill, Bedford.
- Crewe – Leighton Grange, Middlewich Road, Crewe.
- Esholt – The Avenue, Apperley Lane, Esholt.
- Willerby (including head office) – Albion Lane, Willerby.
- Ashcourt (HGVs based but no other personnel here) – 40 Foster Street, Hull.
- Selby Depot, Prospect Way Selby.
- Rigestste Industrial Estate, Station Road, Berkley.

#### 4.3 Urbaser Limited Organisational Context, Local -UK- Internal and External Issues Table

External Issues	Needs and Expectations
Regulator	Identification of Appropriate statutory and regulatory requirements for the Quality aspects under our control/influence understanding of the requirements application within our QMS
Government	<ul style="list-style-type: none"> <li>• Prompt Payment of Tax Due</li> </ul>
Customers	<ul style="list-style-type: none"> <li>• Demonstrate our ISO9001:2015 conformance and compliance</li> <li>• High Level of Quality</li> <li>• Social Corporate Responsibility</li> </ul>
Citizen	<ul style="list-style-type: none"> <li>• Legal Compliance</li> <li>• Meeting Policy Commitments</li> </ul>
Insurers	<ul style="list-style-type: none"> <li>• Prompt reporting of accidents investigations and circumstances</li> <li>• Continuous ISO9001:2015 Compliance</li> <li>• Evidence of non-financial risk management</li> </ul>
Pressure Groups	<ul style="list-style-type: none"> <li>• Adherence to best practice and contractual agreements</li> </ul>
Local communities	<ul style="list-style-type: none"> <li>• Absence of noise, odours, vibration incidents and vermin.</li> </ul>

<b>Banks</b>	<ul style="list-style-type: none"> <li>• Meeting repayment terms</li> <li>• Compliance with loan conditions</li> <li>• Good Risk Management</li> <li>• Legal compliance</li> <li>• Absence of pollution incidents/clean no costs/public liabilities</li> </ul>
<b>Contractors /Suppliers</b>	<ul style="list-style-type: none"> <li>• Clear statement of environmental compliance in tender contracts</li> <li>• Consistent approach to contract variations</li> <li>• Adherence to agreements</li> </ul>
<b>Internal Interested parties</b>	<b>Needs and Expectations</b>
<b>Staff</b>	<ul style="list-style-type: none"> <li>• Good environmental reputation image</li> <li>• Wider focus than just profit</li> <li>• Training and support for all</li> <li>• Continuity of employments</li> <li>• Opportunity for dialogues/improvements and changes</li> <li>• Good Working Conditions, training opportunities continued income</li> <li>• Social/reputational responsibilities</li> <li>• Health and Safety compliance</li> </ul>
<b>Unions / Representatives</b>	<ul style="list-style-type: none"> <li>• Terms and Condition for Workers</li> <li>• Environmental, Health and safety Good Working Conditions,</li> <li>• Training opportunities</li> <li>• Continued income</li> </ul>
<b>Executive Board / Directors</b>	<ul style="list-style-type: none"> <li>• Financial Benefit, Legal Compliance, avoidance of fines reputational gain</li> <li>• Good risk management</li> <li>• Continued growth</li> </ul>
<b>Parent Company</b>	<ul style="list-style-type: none"> <li>• Good risk management</li> <li>• Good Reputation</li> </ul>
<b>Business Partners</b>	<ul style="list-style-type: none"> <li>• Good Working Conditions</li> <li>• Training opportunities</li> <li>• Maintenance of company reputation</li> <li>• Continued growth</li> </ul>

**Table 1: Urbaser Limited Organisational Context**

The output from the company's activities and the influencing internal and external factors are evident as an input to the consideration of risk and opportunities and the action that we need to take to address them

The following documented information will be kept and reviewed in order to describe our organisational context

- Analysis of business plan, strategies and statutory regulatory commitments
- Analysis of technologies and competitors
- Economic reports from various business sectors
- Technical reports / consultancies from technical experts and consultants
- **SWOT** analysis reports or schedule for internal issue
- **PESTLE** analysis report or schedule for external issue
- Minutes of meeting with the authorities

#### 4.4 Scope of the Quality Policy

This Policy is prepared for the purpose of defining the company’s interpretations of the ISO 9001:2015 as well as to demonstrate how the company complies with that standard. This Policy follows the numbering structure of ISO 9001:2015.

#### Quality system and processes:

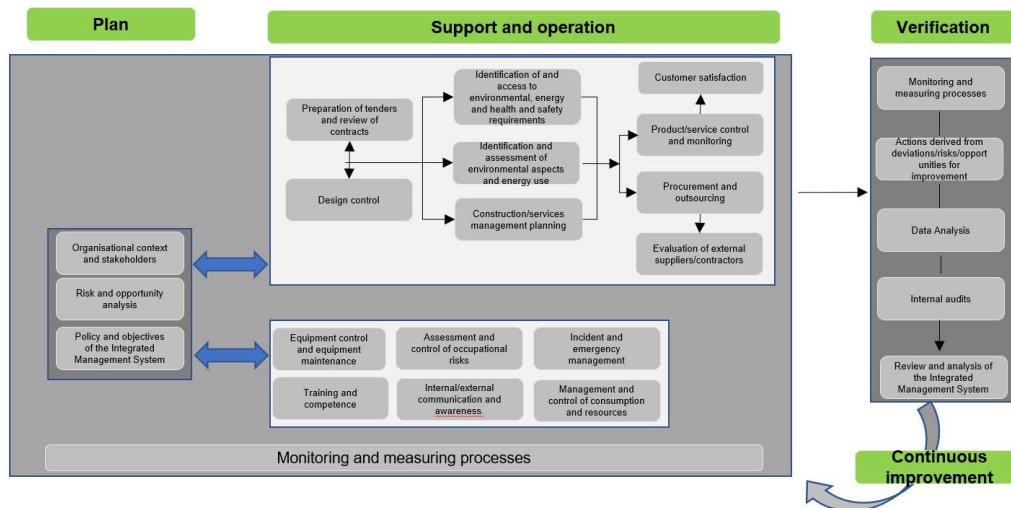
Urbaser limited quality system and processes are defined by the figure below:



Picture 1: Quality system and processes

*Internal* Interrelation of URBASER's Integrated Management System as show below:





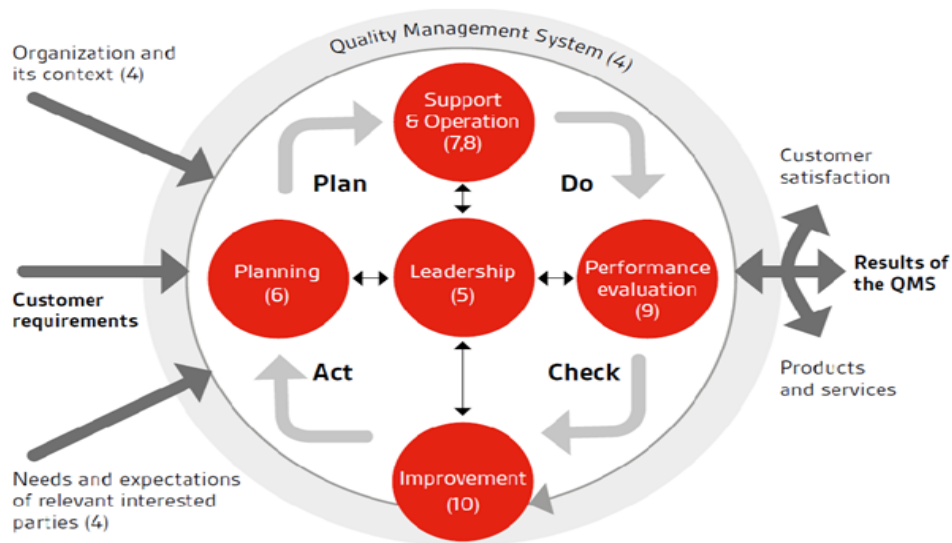
Picture 2: Interrelation of URBASER's Integrated Management System processes.

## 5. Leadership and Governance

Urbaser Limited Top Management are responsible for implementing the QMS which includes the development and deployment of the quality policy, quality objectives and product/project specific plans that are customer focused. At Urbaser Limited Top Management now have greater involvement in the management system and ensure that the requirements of it are integrated into the organization's processes and that the policy and objectives are compatible with the strategic direction of the organization. The quality policy is a living document at the heart of the organization. To ensure this, Top Management are accountable and have a responsibility to ensure that the QMS is made available, communicated, maintained and understood by all parties.

There is also a greater focus on Top Management to enhance customer satisfaction by identifying and addressing risks and opportunities that could affect this. Top Management will demonstrate consistent customer focus by showing how they meet customer, regulatory and statutory requirements, and also how the organization maintains enhanced customer satisfaction.

In the same context, they need to have a grasp of the organization's internal strengths and weaknesses and how these could have an impact on the delivery of products or services. This will strengthen the concept of business process management. In addition, top management need to demonstrate an understanding of the key risks associated with each process and the approach taken to manage, reduce or transfer the risk. Top Management provides the leadership and governance to all activities related to the lifecycle processes including defining the strategic direction, responsibility, authority and communication to assure the safe and effective performances.



**Picture 2: leadership and governance**

Urbaser Limited governance structure provides necessary support for creating and establishing appropriate processes that are important for maintaining and achieving our quality objective policies

In addition, the governance activities include systematic verification of the effectiveness of our QMS by undertaking internal audits and analysing data.

Regular Management Reviews ensure that our quality management system is adequate and effective and that any necessary adjustments are made as a result.

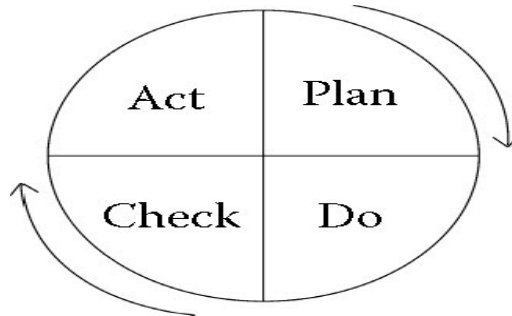
Top Management is committed to implementing and developing the quality management system and this commitment is defined by our corporate policies and objectives. Urbaser Limited ensures that our policies are understood, implemented and maintained at all levels of the organisation through printed distribution of our policy statement and through periodic management review of the policy statement and corporate level improvement objectives. Urbaser Limited communicate our mission, vision and strategy policies and processes through:

- Creating and sustaining shared value of fairness and ethical behaviour
- Establishing a culture of trust and integrity
- Encouraging commitment to quality
- Providing people with required resources, training and authorities to act with accountability
- Inspiring, encouraging and recognising people’s contributions

Top Management at Urbaser establish this by using the principle set in the Deming Shewhart cycle of: **PLAN-DO-CHECK-ACT**.



**Leadership**



**Plan:** Urbaser Limited to establish organisational context and strategies. Determine regulatory and statutory commitments

**Do:** Develop policy and objectives, provide resources, and assign processes owner focus on improving and archiving objectives. Address risk and opportunities

**Check:** review system and process performance data to ensure alignment is maintained between strategy and context

**Act:** Agree changes and improvements to maintain the integrity of the QMS

**5.1. Management commitment**

It is the policy of Urbaser Limited to comply with all relevant aspects of ISO9001:2015. All personnel are required to familiarise themselves with the policy and procedures and implement these when necessary in their work. Management and personnel continually aim to achieve improvements to the quality system.

**5.1.1 Local -UK – Quality- Policy Statement**

Urbaser Limited is a waste management organization that provides the public sector market with a complete solution for waste treatment, waste collection, ground maintenance and street cleansing services. Urbaser Limited strategic direction is to achieve a sustained, profitable growth by providing services which consistently satisfy and exceed the needs and expectations of its customers; whilst also considering all internal and external influences affecting the organizations ability to achieve its intended results. To this end, Urbaser Limited has designed and implemented an efficient and effective quality system based on the requirements of ISO9001:2015 and its Top Management are committed to:

- Ensure the continual Improvement of its QMS by identifying and reviewing the risks and opportunities that can affect the conformity of service and the ability to enhance customer satisfaction and demands.
- Comply with all the legal and statutory requirements, along with those of the client and ensure they are understood, met and constantly reviewed.

To this end Top Management shall:



- Achieve and maintain a high standard of quality in all aspects of its work;
- Take full accountability for the effectiveness of the QMS;
- Approve and endorse the use of a process approach and a risk-based thinking ethos across the company;
- Be open and receptive to client feedback and comments regarding both their requirements and the quality of service;
- Ensure the resources needed for the QMS are available including support and encouragement;
- Ensure continuous improvement of the Quality Management System through audits, monitoring and evaluation of performances;
- Provide training and education to all employees to enhance their performance and professional development
- Continually improve customer satisfaction;
- Reviewing the policy and procedures described in the Quality Policy and associated documents
- Define, set, audit and review the Company's strategy, policy, objectives and targets making sure the stated are compatible with the context and strategic decisions of the company;
- Communicate the importance of the effectiveness of a robust QMS requirements throughout the company;
- Promote the involvement of personnel in various aspects of the QMS system;
- Promote quality awareness through training, improvement and company meetings;
- Establish partnerships with suppliers and other interested parties to provide an improved service, and
- Provide support to the other relevant management roles to demonstrate their leadership as it applies to their area of responsibilities.

Urbaser Limited supports a culture that values the highest quality performance from every employee and every function. We strive for excellence and our guiding values are recognition of individual commitment and credibility.

This Policy Statement is communicated to all personnel who may work with or on behalf of the Company and is available to the public via our website. Both the Quality Policy and Policy Statement will be reviewed and updated as necessary within a period of five years. The international policy will not be signed by the CEO as per internal instructions.

**Javier Peiro**  
**Managing Director**

### **5.1.2 Customer (Client) focus**

The Top Management recognise the importance of achieving customer focus within all levels of the organisation. To this end, the company ensures that customers (clients) needs and expectations are at all times identified and satisfied. In doing this, the company considers regulatory, legal and other obligations related to the service. Urbaser Top Management has established and maintained procedures determining those applicable legal and other QMS requirements that are applicable to the company, including current information leading to other aspects of the Company's activities and services. Urbaser Limited strives to identify current and future customer needs to meet customer requirements and exceed customer expectations

### **5.1.3 Organisational roles, responsibilities & authorities**

Top Management has assigned responsibilities and authorities for all relevant roles in the company. These are communicated through the yearly issue of the company organogram compiled by the MD at Urbaser Limited.

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The Top Management at Urbaser accepts responsibility and authority for:

- a) ensuring that the management system conforms to applicable standards;
- b) ensuring that the processes are delivering their intended outputs;
- c) reporting on the performance of the management system;
- d) providing opportunities for improvement to the management system;
- e) ensuring the promotion of customer focus throughout the organization;
- f) ensuring that the integrity of the management system is maintained when changes are planned and implemented.

#### 5.1.4 Authority

All staff are allocated authority to perform their assigned duties and responsibilities. The following provides a summary of the principal responsibilities of a selection of those roles and greater detail within the operating procedures. All staff share responsibility for identifying any non-compliance or possible improvements and are obliged to record these instances in order that corrective action may be taken, both to rectify the immediate situation and to prevent recurrence. The Managing Director continually reviews the company's resources to ensure that adequate staff, equipment and materials are available to meet customer requirements.

#### 5.1.5 Local UK- Roles & Responsibilities (list non comprehensive please check the job specifications or operating procedures)

##### **Managing Director**

- Approval of the Quality Assurance System
- Management Review
- Design Control
- Supplier Selection & Purchasing
- Contract Management & Control
- Training
- Ensuring that the Quality system is reviewed
- Disciplinary procedures
- Financial Decision
- Strategy and Marketing
- Health and Safety of employees
- Ensuring the availability of resources essential to establish, implement and maintain a Quality system
- Defining roles allocating responsibilities and accountabilities and delegating authorities

##### **Quality, Health, Safety & Environmental Manager (ISO9001 Management Representative)**

- Internal Audit
- Resolution of Quality Assurance System Discrepancies
- Control & Maintenance of the Quality Assurance System
- Documentation & Change Control (Quality System Documents)
- Health and Safety Safe System at work
- Risk Assessment implementation and Review
- Ensuring that a Quality system is established and maintained

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- Managerial Review
- Policy ownership
- Evaluation of Health and Safety and Environmental Performances
- Evaluation of Individual Performances
- Fire plan evacuation and procedures
- Quality trend analysis
- Further administrative requirement

#### **Commercial Director / Head of Legal Department**

- Planning and Co-ordination
- Control of record and contract for legal compliance
- Legal advice
- Reviewing legal register
- Project Concession (Agreement)
- Funding agreements
- Development agreements
- Guarantees and supporting security
- Professional appointments
- Commercial issues arising in connection with project financing, property matters, planning & environment
- Document Control and process management

#### **Financial Director**

- Control of Finance, Accounts and Operations
- Training
- Supplier Selection and Purchasing
- Supports the Board in the preparation of budgets and financial reports, including income statements, balance sheets, tax returns and reports for Government regulatory agencies
- Contributes to the achievement of the company objectives by providing advice and guidance on financial strategy
- Oversees all accounting procedures and systems used by the Company
- Meet with the Board of Directors regularly to keep them informed and to offer direction
- Review reports and analyse projections of sales and income against actual figures and suggests methods of improving the planning process
- In conjunction with the Board, assess the long term financial trends and review prospects for future growth of income and new service areas
- To ensure the Company meets its financial and legal responsibilities

#### **Project Managers / Business Development Manager**

- Plan and prioritise contract opportunities in order to achieve agreed business aims, especially managing personnel and productivity
- Development Strategy
- Manage pricing and margins according to agreed aims
- Maintain and develop existing and new customers through appropriate propositions to optimise quality of service, business growth and customer satisfaction
- Use customer and project contract activities tools and systems, and update relevant information held
- Respond and follow up enquiries using appropriate methods
- Monitor and report on market competitor activities and provide relevant reports on information

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- Communicate and negotiate internally and externally using appropriate methods to facilitate development of profitable business and sustainable relationship
- Attend and present at external customer meeting and internal meetings
- Attend training and develop knowledge, technique and skills
- Adhere to all relevant company policies

**Administration**

- Client Database Administration
- Checking of Sales Orders
- Allocation of Purchase Order Reference Numbers

**HR Manager**

- Ensuring that payroll is administrated correctly and on time
- Strategic decision making of the company with regard to HR
- To Support Managers in the recruitment of personnel
- Evaluation of performances in conjunction with the Quality Manager

**Project Engineer**

- Assisting in producing Steering Committee papers
- Monitoring and reporting on bid costs, highlighting material vacancies from budget
- Develop the Project task list, delegating responsibilities for delivering each element of the submission, ensuring task list is complete
- Develop and maintain meeting schedule
- Implement document control procedures
- Support the Project Director in the bid submission process
- Manage processes between the consortium and the client during the bid, maintaining a schedule of all clarification received
- Assisting in monitoring progress against the bid programme
- Acting as secondary point of contact for the client and take responsibility for developing a strong relationship with them
- Maintain and update as necessary relevant documentation
- Preparing draft regular projects status reports for Project Director

Through the Corporate IMS documentation, the roles and responsibilities of the members of the Organization are attributed and the authority and relationships between all personnel who manage, perform, review or decide on tasks and/or resources related to quality, occupational health and safety, environment and energy management are known, with the aim of meeting the defined objectives. Next, the organizational structure defined for the IMS is defined, which establishes relevant positions to achieve an adequate implementation of the system, whose main functions and responsibilities are

**RESPONSIBLE ROLES AND RESPONSIBILITIES IN RELATION TO IMS**

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<b>Chief Executive Officer</b>	<ul style="list-style-type: none"> <li>Approve the Corporate Policy on Quality, Health and Safety, Environment and Energy, as well as other specific policies in these areas, as deemed appropriate.</li> <li>Ensure the dissemination of the Policy and Objectives in order to motivate all workers to achieve them.</li> <li>To provide the necessary resources to the Organization to achieve an adequate implementation and maintenance of the IMS.</li> </ul>
<b>Documentary Framework Committee</b>	<ul style="list-style-type: none"> <li>Review and disseminate relevant IMS documentation.</li> </ul>
<b>Members of the Steering Comité</b>	<ul style="list-style-type: none"> <li>Disseminate, within their area of responsibility, the IMS Policy and Objectives defined by the Organization.</li> <li>Review and approve (when applicable, according to the established flows), new procedures or new versions of existing ones, related to the IMS matters that fall under their area of responsibility, as well as ensure their compliance.</li> </ul>
<b>RESPONSIBLE</b>	<b>ROLES AND RESPONSIBILITIES IN RELATION TO IMS</b>
<b>Country Director</b>	<ul style="list-style-type: none"> <li>Manage the responsibilities that apply to them in the areas of Quality, Environment, Occupational Health and Safety and Energy.</li> <li>Collaborate to promote among the workers under their responsibility, the correct implementation and maintenance of the IMS.</li> <li>Ensure that the workers in their charge have sufficient training and information in the matters of application of the IMS, for the development of their activity in a safe and sustainable manner.</li> <li>Propose improvements in the aspects related to the IMS that are applicable to its area of action.</li> </ul>
<b>Corporate Directors of other Areas different from QHSE</b>	
<b>Corporate QHSE Director</b>	<p>Same functions as the previous block, and additionally:</p> <ul style="list-style-type: none"> <li>To act as the person responsible for matters related to the IMS at the Corporate level and the Management's representative for these matters within the framework of the IMS.</li> <li>Ensure that the management system is established, implemented and maintained in accordance with the requirements of the applicable international reference standards (ISO 9001, ISO 14001, ISO 45001 and ISO 50001).</li> <li>Report to top management on the performance of the IMS for review, including recommendations for improvement.</li> <li>Maintain relations with the external company in charge of certification.</li> <li>Ensure the support of other departments of the Organization when necessary.</li> <li>Ensure that the necessary economic and personnel resources are allocated to ensure the proper functioning of the IMS.</li> <li>Promote continuous improvement of the IMS and the Organization's performance in the aspects related to the IMS.</li> <li>Promote awareness of the need to ensure compliance with customer requirements, legal requirements and other requirements associated with the activity in the IMS matters, at all levels of the Organization.</li> <li>Coordinate the actions before the Public Administrations in IMS matters.</li> <li>To request assistance in all that he/she considers necessary for the performance of his/her duties, from the Managers and Technicians of his/her Department, as well as from the</li> </ul>





	Energy Management Department. When the QHSE Department appears in any document as being in charge of assuming a certain responsibility or signing a certain register, these functions will be assumed by the Managers and Technicians designated by the Corporate QHSE Director, according to the functions attributed to each of them, or assumed by the Corporate QHSE Director himself.
Director of	
other	<ul style="list-style-type: none"> <li>Ensure compliance with those aspects of the IMS that apply to it.</li> </ul>
Corporate	<ul style="list-style-type: none"> <li>To offer support for the correct development of the activities related to their area.</li> </ul>
Areas	
Country and Company QHSE Director	<ul style="list-style-type: none"> <li>Ensure compliance with those aspects of the IMS that apply to it.</li> <li>To provide support for the correct development of activities related to QHSE, especially supporting the Contract Managers of those companies in which they have assigned responsibilities.</li> <li>Represent, collaborate and report when appropriate, to the Corporate QHSE Director on the implementation, evolution and maintenance of the IMS.</li> </ul>
QHSE Specialist	<ul style="list-style-type: none"> <li>Ensure compliance with those aspects of the IMS that apply to it.</li> <li>To provide support for the correct development of activities related to QHSE, especially supporting the Operations Managers of those companies in which they have assigned responsibilities.</li> <li>Collaborate with the QHSE Country/Society Manager to ensure proper coordination and management of IMS related tasks.</li> <li>Represent, collaborate and report when appropriate, to the Corporate QHSE Director on the implementation, evolution and maintenance of the IMS.</li> </ul>
Contract Manager	<ul style="list-style-type: none"> <li>To disseminate, within the area of his/her responsibility, the Policy and Objectives defined for the Organization.</li> <li>Ensure that IMS procedures are properly implemented.</li> <li>Ensure compliance with those aspects of the IMS that apply to it.</li> <li>Collaborate with and inform, when appropriate, the QHSE Country/Society/ QHSE Specialist, on the implementation and maintenance of the IMS.</li> <li>Ensure that records associated with the IMS are completed, archived and maintained.</li> <li>Evaluate the effectiveness of corrective actions, if necessary.</li> </ul>
Internal Auditors	<ul style="list-style-type: none"> <li>Communicate and clarify audit requirements to auditees.</li> <li>Typify the findings made during the audit in the different categories (deviations, observations and opportunities for improvement).</li> </ul>



RESPONSIBLE	ROLES AND RESPONSIBILITIES IN RELATION TO IMS
	<ul style="list-style-type: none"> <li>• Prepare the audit report.</li> <li>• Ensure the confidentiality of the information obtained.</li> <li>• Act with objectivity.</li> <li>• Propose improvements whenever necessary.</li> </ul>
Other Staff	<ul style="list-style-type: none"> <li>• Ensure compliance with those aspects of the IMS that apply to it.</li> <li>• Active participation in the continuous improvement process through suggestions for improvement and implementation.</li> <li>• Ensure, based on the information and training received, compliance with the preventive measures related to their job.</li> <li>• Immediately communicate, as established, any situation that they consider may present a risk to their safety and health, to that of third parties or to the environment.</li> </ul>

## 6. Planning as per PIN 03 & PIN 08

The purpose of this process is to establish the working system to be followed by URBASER to improve process efficiency and environmental, energy and occupational health and safety performance through the analysis of risks and opportunities associated with the Integrated Management System of URBASER, based on the previous analysis of the context of the Organization, the stakeholders, the organizational structure, the objectives established and the activities carried out by the Organization. The chief aim of Risk and Opportunity management within Urbaser Limited is to ensure that organisational capabilities and resources are employed in an efficient and effective manner to take advantage of opportunities and to mitigate the risk.

Top Management are responsible for incorporating risk based thinking into our organisation's culture. This includes the establishment of risk management policies and targets to effectively identify of risk and opportunity management principle and activities by:

- Providing sufficient resources to carry out risk and opportunities management activities
- Assign responsibilities and authorities for risk and opportunity management activities
- Reviewing information and results from audits and risk and opportunities management activities

Urbaser Limited has established and maintained several procedures to ensure adequate co-ordination and effective performance of control, verification, measurement and testing throughout the organisation in line with its quality policy

The scope of Urbaser Limited's risk and opportunities management process include the assessment of the internal and external issues and the assessment of the needs and expectation of any interested parties. Risk and opportunity management undertaken as part of Urbaser's day to day operations and is captured in the following hierarchy

- Strategic level
- Programme level
- Department level
- Process level



Establishing such hierarchy for capturing risk and opportunities ensures that each is managed at the most appropriate level within our organisation. Typically the following categories are assigned to each level in the hierarchy as follows:

<b>Business Hierarchy</b>	<b>Risk and Opportunities</b>
<b>Strategic level</b>	<b>Budget and Profitability</b>
<b>Programme Level</b>	<b>Performance and Efficiency</b>
<b>Department Level</b>	<b>Resources and targets</b>
<b>Process Level</b>	<b>Evaluation and Assurance</b>

Urbaser Limited has classified its risks as the amount of risk that we are willing to accept in pursuit of an opportunity or the avoidance of risk where each pertains to services provided, and/or system conformity, which reflect the following consideration

1. Risk Management Philosophy per service
2. Capacity to take on or mitigate the risk
3. Our objectives and respective stakeholders demands.

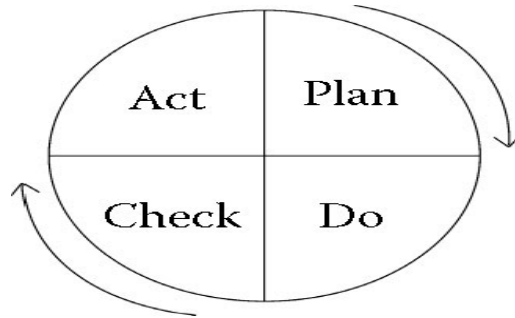
Urbaser Limited considers risks and opportunities when taking action within the management system as well as when implementing or improving the management system; likewise, these are considered relative to the service provided to the various Clients. Risks and opportunities are identified as part of the Context of the Organization as well as throughout all other activities of the QMS. Risks and opportunities are managed in accordance with the Risk and Opportunities risk register. This register defines how risks are managed in order to minimize their likelihood and impact and how opportunities are managed to improve their likelihood and benefit.

**RESPONSIBILITIES**

TASK / ACTIVITY	RESPONSIBLE
Identify and Evaluate Risks and Opportunities thus defining the Risks and Opportunities Map PIN08-CORP-D01	Country/Company QHSE Director with support from the Internal Audit Department and other Departments as deemed necessary.

Risk and Opportunities at Urbaser are established by using the principle set in the Deming Shewhart cycle of: **PLAN-DO-CHECK-ACT**.

**Risk and Opportunities**



**Plan:** Create Plans to address Risk and Opportunities

**Do:** Implement plans to minimise risk and adopt opportunities

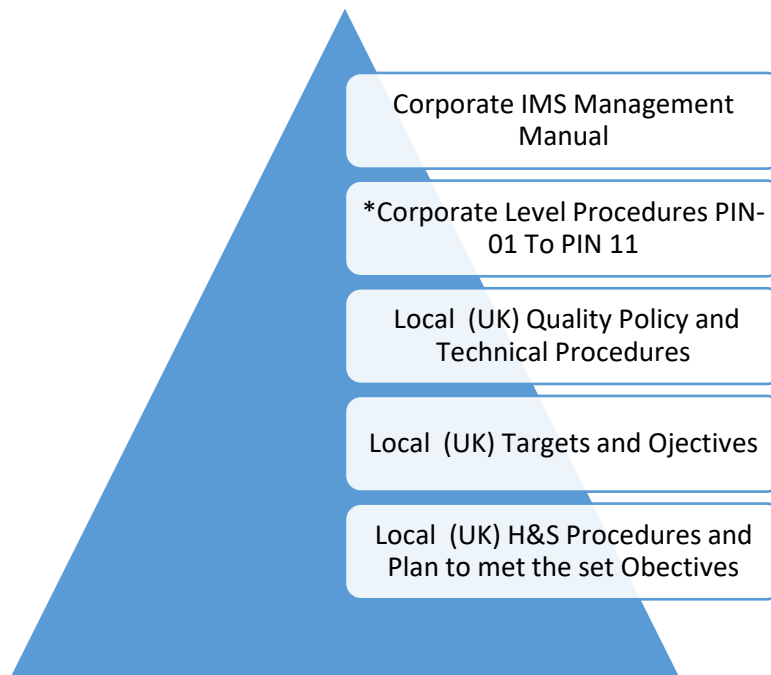
**Check;** Monitor, audit and measure risk and opportunity

**Act:** Implement changes and improvements to maintain the integrity of the QMS

Top Management enhance customer satisfaction by identifying and addressing risks and opportunities that could affect this. Top management demonstrate consistent customer focus by showing that they meet customer, regulatory and statutory requirements and also how the organization maintains enhanced customer satisfaction.

In the same context, they show that they have a grasp of the organisations internal strengths and weaknesses and how these could have an impact on the delivery of products or services. This strengthens the concept of business process management. In addition, Top Management demonstrate an understanding of the key risks associated with each process and the approach taken to manage, reduce or transfer the risk.

## 6.1 Corporate & Local (UK) Procedures



- \*Corporate Level Procedures PIN-01 To PIN 11

PIN-01-CORP CREATION AND CONTROL OF IMS DOCUMENTATION

PIN-02-CORP IDENTIFICATION AND EVALUATION OF LEGAL REQUIREMENTS

PIN-03-CORP ACTIONS DERIVED FROM DEVIATIONS, RISKS AND OPPORTUNITIES FOR IMPROVEMENT

PIN-04-CORP INTEGRATED MANAGEMENT SYSTEM AUDITS

PIN-05-CORP IMS MANAGEMENT REVIEW

PIN-06-CORP SERVICE MANAGEMENT PLAN

PIN-07-CORP EMERGENCY RESPONSE

PIN-08-CORP RISK AND OPPORTUNITY MANAGEMENT

PIN-09-CORP OBJECTIVES AND PERFORMANCE INDICATORS

PIN-10-CORP COMMUNICATION AND AWARENESS

PIN-11-CORP CUSTOMER REQUIREMENTS MANAGEMENT



## 6.2 Company objectives as per PIN 09

The key points of our service delivery to the clients have objectives established for them. Each objective is then supported by at least one “metric” or key performance indicator (KPI) which is then measured to determine the ability to meet the quality objective. Hence some objectives must be quantifiable.

Throughout the year data is measured and gathered by the objectives’ owners, or other assigned managers, in order to present the data to Top Management. The data is then analyzed in order that Top Management, usually at the corporate QHSE meetings, may set goals and make adjustments for the purpose of long-term continual improvement.

When a target does not meet a goal, or an unexpected problem is encountered with a process, the corrective action process is implemented to research and resolve the issue. In addition, opportunities for improvement are sought and implemented for the identified processes.

## 6.3 Outsourced processes

Any process performed by a third party is considered an “outsourced process” and must be controlled. The company’s outsourced processes, and the control methods implemented for each, are defined in the subcontractor procedure.

The type and extent of control to be applied to the outsourced process takes into consideration:

- a) the potential impact of the outsourced process on the company’s capability to provide services to the Urbaser and the Client that conforms to requirements,
- b) the degree to which the control for the process is shared,
- c) the capability of achieving the necessary control through the purchasing contract requirements

## 6.4 Change Management

When Urbaser Limited determines the need for changes to the management system or its processes, these changes are planned, implemented and then verified for effectiveness.

# 7. Support

## 7.1 Provision of resources

Top Management have determined what resources are needed to implement and improve the Quality System and address stakeholder needs. Urbaser Limited ensures that these resources are provided in a timely manner. The implementation of the Integrated System was achieved with Top Management commitment and with sufficient resources assigned to the task. To effectively maintain and continually improve the system, Top Management determines and provides necessary resources as they are required.

Urbaser Limited determines and provides the resources needed:

- a) to implement and maintain the management system and continually improve its effectiveness
- b) to enhance customer satisfaction by meeting customer requirements

Resource allocation is done with consideration of the capability and constraints on existing internal resources as well as needs related to supplier expectations.

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Resources and resource allocation are assessed during management reviews.

### 7.1.1 Human Resources

Top Management ensures that it provides sufficient staffing for the effective operation of the management system, as well its identified services.

Staff members performing work that may affect the quality of the services are competent on the basis of appropriate education, training, skills and experience. The documented procedure *PDR-Competency Framework* defines these activities in detail.

Training and subsequent communication ensure that staff are aware of:

- a) the quality policy;
- b) relevant quality objectives;
- c) their contribution to the effectiveness of the management system, including the benefits of improved performance;
- d) the implications of not conforming with the management system requirements.

### 7.1.2 Infrastructures

The Top Management of Urbaser Limited identify, provide and maintain those facilities that are needed to achieve service conformity. These include adequate workplaces and associated welfare facilities, the necessary equipment (both hardware and software) and all the support services.

Infrastructure includes, as applicable:

- a) buildings, workspace and associated facilities;
- b) process equipment, hardware and software;
- c) supporting services such as transport;
- d) information and communication technology.

### 7.1.3 Work environment

Applies to all locations used for any managerial function or storage of records. Human factors are considered to the extent that they directly impact on the quality of Services.

### 7.1.4 Condition requirements

The following times should be reviewed for environmental security following any changes to personnel structure, management or building security arrangements.

- Day time unoccupied
- Day time occupied (regarding both welcome and unwelcome visitors)

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- Night time
- Vacation periods and weekends
- Temperature to be comfortable

Urbaser limited a relaxed and professional environment to work in. Top management strive to identify any factors that can contribute or enhance an undetected pre-existing condition of stress.

Urbaser take the wellbeing of its employees very seriously and all the stressors are identified, fought and eliminated at the source. Urbaser Limited environment is free from acts that can be determined as discriminatory, psychological and/or physically abusive.

Top Management is always available along with the HR department to direct and/or counsel employee in difficult moments.

*Note: Social, psychological and safety aspects of the work environment are managed through activities outside of the scope of the management system. The Harassment and Bullying policy will apply in some circumstances.*

#### **7.1.5 Organisational knowledge**

Urbaser Limited also determines the knowledge necessary for the operation of its processes and to achieve conformity of the service provided to the Client. This may include knowledge and information obtained from:

- a) internal sources, such as lessons learned, feedback from subject matter experts and/or intellectual property;
- b) external sources such as standards, academia, conferences, and/or information gathered from customers or suppliers.

This knowledge is maintained and made available to the extent necessary for its use.

When addressing changing needs and trends, Urbaser Limited considers its current knowledge and determines how to acquire or access the necessary additional knowledge

#### **7.1.6 Competence awareness and training**

Urbaser Limited ensures that any personnel performing works that may affect service or quality are fully capable to carry out the tasks relative to their job description. To ensure competence of our personnel, job descriptions have been prepared identifying the qualifications required for each position that may affect service quality. Appropriate qualifications, along with required training and previous experience in the role provide the competence required for each position. Qualifications are reviewed upon hire, when an employee changes positions or the requirements for a position change.

Human Resources maintain records of employee qualifications. If any differences between the employee's qualifications and the requirements for the job are found, training or other action are taken to provide the employee with the necessary competence for the job. All employees are trained on the relevance and importance of their activities and how they contribute to the achievement of the quality objectives.

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A Training Matrix has been developed and is continually maintained by the Head of QHSE Department (or delegated to local depots in some cases). The Matrix identifies the training requirements for an individual necessary to undertake their specific role in the company. Furthermore, it is also used as a tool to record an individual's continuous professional development and it is also considered as a tool to ascertain gaps in operative's roles, hence the need of further training. This gap identification is usually performed by the individuals Manager and HR department. The Matrix is utilized throughout an individual's development within the Company:

- On induction – On successful employment to the Company, the QHSE Manager will utilise the Training Matrix to ensure that an individual has the necessary training and qualifications necessary to perform the role for which they have been employed. Where shortfalls are identified, a programme of training will be developed and engaged to ensure the necessary competence and qualifications are attained. The Matrix will be updated in order to document all additional competencies / qualifications attained by an individual.
- Through variation in responsibilities / change of role – In instances where the responsibilities of a role are varied or if an employee's role within the Company changes, the Training Matrix will be consulted to identify any additional training requirements necessary for an individual to conduct their role. Where shortfalls are identified, a programme of training will be developed and engaged to ensure the necessary competence and qualifications are attained. The Matrix will be updated in order to document all additional competencies / qualifications attained by an individual.
- To record Continuous Professional Development – The Company encourages individuals to take advantage of training opportunities, where relevant, and offers the opportunity to study for an appropriate professional qualification. Where professional qualifications, over and above those necessary to perform an individual's role within the Company, are attained, such qualifications shall be recorded within the Training Matrix.

In conjunction with the HR document called PDR this policy describes competency of individuals as follows

<b>Knowledge</b>	The Information we possess	What we Know	<b>Capability/Competency</b>
<b>Skills</b>	Our ability to perform a physical or mental task	What we can do	
<b>Competencies</b>	How we behave while performing our work task	How we go about it	

#### 7.1.7 Internal consultation and communication

Top Management ensure that effective communication processes are established, implemented and maintained and are fully communicated to all personnel. The processes are established for communication within the



organization. Methods of communicating the effectiveness of the QMS include department and management meetings, management review, circulation of minutes of management review meetings, internal audit closing meetings, and other routine business communication such as email.

## 7.2 Communication as per PIN 10

Urbaser Limited has established and maintains procedures with regard to its Quality aspects for internal and external communication between the various levels and functions in the organisation, and receiving, documenting and responding to relevant communications from external parties. Urbaser Limited will demonstrate management commitment to the safety of its employees and the environment; deal with concerns and questions about significant environmental aspects; raise awareness on environmental policies, objectives, targets and programs; inform internal and external interested parties about Quality and performance as appropriate. Energy saving procedures will be cascaded down via Memo and or PowerPoint presentations.

### 7.2.1 General definitions within Urbaser Limited Quality System

**Disclaimer:** a statement which clarifies instances where a general claim or possible implication of any kind may not apply to the particular case. Examples are statement about work methods applied, standards applied, accreditation scope or indirect implication of any of these either in the document where the disclaimer is required or in other paperwork including marketing literature that may give rise to ambiguity or generalisations that may not apply to subsequent reports or claims.

**Claimer:** This is a required additional statement to clarify areas that any other statement or implication may otherwise lead to misinterpretation. In this way it is similar to a disclaimer and very often claimers and disclaimers exist in the same sentence or paragraph in order to clarify which areas of work have what condition or status applied. Possible uses are wide in scope and important examples include statements of what work reported in a report (or other transmission) is accredited and what is not, which areas or aspects of work were carried out by a subcontractor, which by a client and which by Urbaser Limited.

### 7.3 Disclaimers required

- Accreditations that are available for the type of work carried out but for which accreditation is not held must be disclaimed so as not to imply by association with the UKAS/BSI logo and or with information about what Urbaser Limited is accredited for.
- Opinions and Interpretations are outside the scope of work.

## 7.4 Document Control & control of records as per PIN 01

Urbaser Limited has established and maintains procedures for the control of all documents required for the QMS. Procedures exist for the approval of documents to ensure that they are adequate to issue. The procedures ensure that documents are traceable, that current document revision status is identified, and that relevant current versions are available in the areas where they are needed to maintain effective operation of the system. The documents have to be at all the time legible and easy to identify and retrievable with date of issue and date of amendments where applicable, maintained in an ordinate fashion and retained for a specific period of time, documents which originated externally are similarly identified and controlled. Records are established and maintained to supply evidence of compliance with defined requirements and the successful achievement of the QMS. Records are to be legible, identifiable and easily located. Document procedures have been established which define the controls required for identification storage protection, retrieval, loss, damage, deterioration and disposal.

**Document control** applies to all documents that are used by the Integrated System or any work within the scope of Urbaser’s activities. All such documents are known as ‘controlled documents’ and every publication, check list

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and form will display a unique document registration, using the guidelines published by Urbaser S.A.U. in Regulation 0.

**Control of Records** concerns the controlled storage and movement of records, which are the records of all the work and communications relating to any work in the scope of accreditation. (Examples are test reports, letters to clients, quotations, planning and meetings records relating to the work and any syllabuses or documents that are being kept as a record of what document applied at the time of the work). Records must be held secure for confidentiality of clients and personnel.

**Document control concerns** the issuance of the correct and current documents, such as standards, training syllabuses, blank forms or workbooks. Issue of documents and forms is controlled by computer system access permissions, which is set and maintained to mirror authorisation of each person.

**Document approval and issue** the master versions of all templates are stored in secured access areas of the office computer system. Site documents like policies and procedures along with HSE guidance will be supplied electronically by means of UBS Keys. In case such keys are lost documents will be available via internet, all required documents and forms must be available to the persons who require them. The QHSE Manager is responsible for carrying out issue and distribution of documents and forms, and for collecting superseded and obsolete issues. The policy must be immediately available for all management, quality staff and project controllers. Control of all issues is made effective by use of Document Issue Records which include one for sites to ensure that all sites storing documents for use are updated promptly.

#### Document Review

**External documents** are checked at least annually for current version being up to date. This is done by using information from or contacting the supplier of the document.

**Internal documents:** All are reviewed at least annually for appropriateness of use, layout and content. They may be for example be modified to accommodate difficulties or errors made in use or to accommodate system design modifications. The standards to which the quality system is applied and policies within the quality system must be observed before making changes.

The review is also to check compliance with the standard. It must be carried out by a person knowledgeable and experienced about the work and current quality procedures. Schedules and records for reviews are kept in electronic folders. The QHSE Manager implements the review and persons or positions who were issued or previously reviewed a document will often review the same documents. The issuing function is displayed at the foot of all documents and forms (display on labels is optional.) Further specific requirements of the review may apply. The review schedules and forms are kept as electronic records only.

Any review of audit programmes must include a review of all aspects of the current ISO 9001:2015 and the usability of the scheduling system. The document review file will contain or point to the schedules for the reviews. The QSHE Manager and the Director are the only authorities within Urbaser that are permitted to ameliorate/replace/change both Quality and Technical documents.

#### Document Compilation and Authorisation

**Obsolete forms:** Obsolete forms are removed from the system and destroyed or archived on a regular basis. This is carried out by QHSE. One copy of each obsolete document is kept and clearly marked as obsolete or superseded as appropriate. The QHSE Manager ensures that this is completed by using the document issue registers and recording the return and destruction or transfer to archive as is the case for each document.

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**Document and form identification**

Documents must be uniquely identified with date of issue and version number. In the case of forms this is normally using the form / document registration system given in Appendix A. The system is also used for documents produced from templates (such as survey and test reports).

In addition all documents and forms are to include the following:

- The issuing authority
- Page number
- Total number of pages or the words 'End' to signify the end of the document.

The above policy also applies also to any forms and documents that are electronic only in format, including forms in a database or spreadsheet program.

Where possible (not a requirement) templates should also display their storage location. The table below shows the particular configurations of the above requirements applied to the various documents.

Type of Document	Unique Identification Format	Format of number of pages display
Environmental Policy	Individual pages to display Title of Document, No. & title of section, page issue number (historic issue count for that page), and date of issue.	Numbered as page number within the section. 'Page x of y' where x is the sequential page count and y is the total number of pages in the section

**Document changes**

**Review of changes to documents**

Any changes to all documents and forms relating to any accredited activities are reviewed by the QHSE Manager. Approval of all documents for accredited work areas is carried out by the QHSE Manager. Any altered or new documents must show that they are a new issue by one of two means. 1) For the Quality Policy and revised documents each page should show the issue date with new version number, 2) For new documents and forms a new Form/ Document Registration Number is applied containing a date section that indicating the start date of authorisation for use.

**Coding format for documents**

Templates of the various document types detailed below are available for use by all staff and are accessed via the shared area.

Policy



Codification example:						
CODING	DOC. TYPE	No.	CORPORATE / (COUNTRY / COMPANY / WORK CENTER)	TITLE	VERSION	FINAL CODING
POL - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo.	POL	01	UK	INSURANCE	V1	POL-01-UK-INSURANCE-V1

Procedure<sub>2</sub> depending on its contents:

- ✓ Administrative Procedure (PA):

Codification example:						
CODING	DOC. TYPE	No.	CORP / (COUN / COMP / CEN)	TITLE	VERSION	FINAL CODING
PA - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo.	PA	01	UK	INSURANCE	V1	PA-01-UK-INSURANCE-V1

- ✓ Systems / IT Procedure (PS):

Codification example:						
CODING	DOC. TYPE	No.	CORP / (COUN / COMP / CEN)	TITLE	VERSION	FINAL CODING
PS - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo.	PS	07	UK	SYSTEMS	V1	PS-07-UK-SYSTEMS-V1

- ✓ QHSE and Energy Procedure:

- PIN (Integrated)
- PCA (Quality)
- PMA (Environment)
- PSS (Health and Safety)
- PE (Energy):
- 

Codification example:



CODING	DOC. TYPE	No.	CORP / (COUN / COMP / CEN)	TITLE	VERSION	FINAL CODING
<b>PIN - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo.</b>	<i>PIN</i>	<i>02</i>	<i>UK</i>	<i>ENERGY</i>	<i>V1</i>	<i>PIN-02-UK.-ENERGY-V1</i>

✓ Innovation Procedure (PI):

Codification example:						
CODING	DOC. TYPE	No.	CORP / (COUN / COMP / CEN)	TITLE	VERSION	FINAL CODING
<b>PI - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo.</b>	<i>PI</i>	<i>01</i>	<i>UK</i>	<i>CORRECTIVE ACTIONS</i>	<i>V1</i>	<i>PI-01-UK-CORRECTIVE ACTIONS- V1</i>

**Instructions / Protocols:** INS / PRT:

Depending on the content of the regulation, the following acronym will be added to INS / PRT: Administrative (A; for example, INSA o PRTA), System (S), QHSE and Energy (IN, CA, MA, SS and E), Innovation (I).

Codification example:						
CODING	DOC. TYPE	No.	CORP / (COUN / COMP / CEN)	TITLE	VERSION	CODING
<b>PRTxx - No. - CORP/(COUN/COMP/CEN) - TITLE - VNo.</b>	<i>PRTA</i>	<i>01</i>	<i>UK</i>	<i>VALVES</i>	<i>V1</i>	<i>PRTA-01-UK-VALVES - V1</i>

Records and Documents:

CODING	DOC CODIFICATION TO WHICH THEY BELONG	D + No.	DOC. TITLE
<b>Pxx - No. - CORP/(COUN/COMP/CEN) - DNo. - RECORD TITLE</b>	<i>PA-14-UK</i>	<i>D14</i>	<i>LOSS INVOLVING DAMAGE TO PROPERTY</i>

## 8. Operational Planning and Control AS PER pin 02 & 06

Urbaser Limited plans and develops the services requirements needed for delivering of its activities. Planning for the delivery of the service is consistent with the requirements of the other processes of the management system. Such planning considers the information related to the context of the organization (see section 4.0 above) and current resources and capabilities as well as statutory and legal requirements.

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### 8.1 Customer related processes as per PIN 11

Shall Urbaser Limited decide to tender for a project then a formal process is entered. This includes the appointment of a project manager and suitable team and may entail a site investigation which ensures that all requirements can be identified and evaluated, From this information an outline strategy is produced and reviewed to ensure that the project is adequately defined, Urbaser Limited can perform the work and any changes from the initial enquiry have been considered and addressed. The tender is then prepared and submitted to the customer for acceptance. Once the tender has been accepted, regular contact is maintained with the customer throughout all stages of the mobilisation. This includes project meetings and an end of project review which also provide opportunities for the client to give feedback including any problems encountered.

During the intake of new business Urbaser Limited captures:

- a) requirements specified by the customer, including the requirements for delivery and post-delivery activities;
- b) requirements not stated by the customer but necessary for specified or intended use, where known
- c) statutory and regulatory requirements related to the service.
- d) any additional requirements determined by Urbaser Limited.

Once requirements are captured, Urbaser Limited reviews the requirements prior to its commitment to supply the service. This review ensures that:

- a) service requirements are defined,
- b) contract or order requirements differing from those previously expressed are resolved,
- c) the organization has the ability to meet the defined requirements and/or the claims for the Service it provides, and
- d) risks have been identified and considered.

### 8.2 Customer communication

Urbaser Limited has implemented effective communication with customers in relation to:

- a) providing information relating to services.
- b) handling enquiries, contracts or orders, including changes;
- c) obtaining customer feedback relating services, including customer complaints;
- d) handling or controlling customer property;
- e) establishing specific requirements for contingency actions when relevant

### 8.3 Design

Design work, namely the Architectural /Structural design and project design for waste facilities being EfW or MBTs, is conducted in accordance with document procedures and takes into account all applicable current codes and practices. The output from the design process is in the form of a design plan which includes:

- Drawing
- Calculation
- Specifications

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Those outputs are reviewed and verified by an independent designer and the final design is issued. Due to the nature of work validation of the design cannot be conducted until the finished design is implemented. Validation takes from a post project review plus measuring and testing activities. The results of these activities are recorded and may be used as input for future similar designs. Design changes may be initiated by the customer.

For new designs and for significant design changes, Urbaser Limited ensures the translation of clients' needs and requirements into detailed design outputs. These address performance, reliability, maintainability, testability and safety issues as well as regulatory and statutory requirements.

This process ensures:

- a) Design planning is conducted
- b) Design inputs (requirements) are captured
- c) Design outputs are created under controlled conditions
- d) Design reviews, verification and validation are conducted
- e) Design changes are made in a controlled manner.

These processes are however undertaken mostly by our parent company Urbaser SA or subcontracted to external architects and/or construction companies hence satisfaction of point 8 requirements of ISO9001:2015 will indirectly fall under the appointment and control of subcontractors.

#### 8.4 Control of service provision

Service provision is planned and carried out under controlled conditions taking into account as appropriate:

- The availability of information applicable to service characteristic
- The availability of applicable work instruction
- The suitability of vehicles and equipment
- The availability and use of monitoring and measuring equipment

The implementation of services as per statutory contract, delivery and post-delivery activities control the provision of Services for our clients as follows:

- a) the availability of documents or records that define the characteristics of the Services as well as the results to be achieved;
- b) the availability and use of suitable monitoring and measuring resources;
- c) the implementation of monitoring and measurement activities;
- d) the use of suitable infrastructure and environment;
- e) the appointment of competent persons, including any required qualifications;
- f) the implementation of actions to prevent human error;
- g) the implementation of release, delivery and post-delivery activities.

Urbaser Limited has established and maintained several procedures to ensure adequate co-ordination and effective performance of control, verification, measurement and testing throughout the organisation in line with its quality policy, objectives and targets.

The range of the operational control procedures may vary from time to time, depending upon the nature of the operations, the extent and the scale of various aspects.

#### 8.5 Validation

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Processes are validated in situations where output cannot be verified, or where problems arise post-delivery. Test results will be validated against internationally recognised standards.

### 8.6 Identification of traceability

Contracts that are awarded to Urbaser are dealt with by the specific department responsible e.g. Waste Treatment or Municipal Services. Service process and associated quality records are identified and recorded, throughout the service period.

### 8.7 Customer property

Where a Customer supplies property or materials as part of a contract, these are subject to the same procedures as similar property or materials bought for the Customer. i.e. where appropriate; they are properly identified, verified, stored and maintained in good condition. Details of Customer supplied property, data or material are recorded. Any such supplied property or material that is suitable for use is recorded and reported to the Customer.

### 8.8 Preservation of product

Urbaser Limited services do not require this close adherence

### 8.9 Control of monitoring and measuring device

Contract Managers determine appropriate monitoring and measurement requirements and the equipment necessary to provide evidence that service provision is compliant with Clients statutory, regulatory and other applicable requirements.

Equipment that is used to verify service requirements are identified and calibrated and / or verified against certified equipment.

When used in monitoring and measurement: the ability of computer software to satisfy intended applications is confirmed, prior to initial use and re-confirmed as necessary.

If equipment is found to be out of calibration, it is the responsibility of the manager involved to assess the effects of its previous work.

Suitable environmental conditions are provided for the calibration, inspection, measure, and tests performed.

It is the responsibilities of managers to ensure that the equipment, within their control, is protected from misuse.

### 8.10 Identification and traceability

Where appropriate, Urbaser Limited identifies its services or other critical process outputs by suitable means. Such identification includes the status of the service with respect to monitoring and measurement requirements. Unless otherwise indicated as nonconforming, pending inspection or disposal, or some other similar identifier, all services shall be considered conforming and suitable for use.

If unique traceability is required by contract, regulatory or other established requirement, Urbaser Limited controls and records the unique identification of the service.

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### 8.11 Property belonging to third parties

Urbaser Limited services do not require this close adherence

### 8.12 Preservation

Urbaser Limited services do not require this close adherence

### 8.13 Post-delivery activities

Urbaser Limited conducts no activities which are considered "post-delivery activities"

### 8.14 Process change control

Urbaser Limited services do not require this close adherence

### 8.15 Release of services

Acceptance criteria for services are defined in appropriate subordinate documentation. Reviews and inspections are conducted at appropriate stages to verify that the Service requirements have been met. Usually this is ascertained with Monthly and Quarterly operations and finance meetings with the Clients.

### 8.16 Control of non-conforming outputs

Urbaser ensures that services that do not conform to their requirements or contractual KPI's are identified and controlled to prevent non-conforming work

The controls for such nonconformance's, rectifications and defaults defined in each contract signed with the Client and monitored by their personnel.

### 8.17 Purchasing services and supplies

It is Urbaser Ltd.'s policy to use, as far as possible, suppliers certified by a third party to a recognised international standard such as ISO9001:2015 or equivalent. To this, end a supplier questionnaire has been devised. The aim of the questionnaire is to ascertain suitability and reliability of the approved suppliers. The questionnaire entails the answering of general questions along with vital accountancy information as well, in order to appreciate solidity of the business on review. Upon receipt of the questionnaire it is at the discretion of the Managers / Directors to compare the supplied info against the competitors prior to final approval. This applies to all products or services used that may affect quality of work undertaken in relation to our method(s) of work. The manufacturer and supplier standard must be able to ensure consistency of products and notification of any changes. Any such changes will mean that tests need to be carried out on the revised specification. Suppliers information is detailed in the Company's Suppliers Register which gives the item specification requirements and generally also the item or catalogue number where appropriate. When a company holds accreditation by external bodies (e.g. BSI) the questionnaire does not need to be required since accounts and procedures are already audited by a certified body; a copy of their accreditation will suffice.

### 8.18 Procedures

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If items or services need to be purchased from a supplier who is not in the Suppliers Register, the questionnaire will be required together with the quote or proposal for delivering the services. Should all the questions have been answered satisfactorily the supplier will be approved and added to the Suppliers Register. The best option will fall on the best quality / price relation.

A purchase order must be raised prior to the item or service being delivered / purchased with a recommendation to prove the best quality/price/value for money option.

#### 8.19 Subcontracting

Subcontracted work will only be given to competent and qualified persons / companies who will be audited for suitability. Suitability will be ascertained by means of a subcontractor questionnaire. Subcontractors approved by the above process are added to the Subcontractors Register. If required by the relevant contract to deliver the services, whenever a subcontractor is used the client must be informed in writing that a subcontractor is to be used including the scope of services to be delivered. The clients' approval must be obtained and preferably in writing where possible.

Urbaser Ltd is responsible to the client for the subcontractors.

The Subcontractors Register must show all subcontractors used for any type of work delivered. The register must also be reviewed and updated periodically in order to reassess the continued approval of accreditation status and use of each subcontractor listed. An audit will be carried out annually or sooner shall the case require doing so.

#### 8.20 Disclaimers and Claimers

##### **General definitions within Urbaser Limited Quality system**

**Disclaimer:** a statement which clarifies instances where a general claim or possible implication of any kind may not apply to the particular case. Examples are statement about work methods applied, standards applied, accreditation scope or indirect implication of any of these either in the document where the disclaimer is required or in other paperwork including marketing literature that may give rise to ambiguity or generalisations that may not apply to subsequent reports or claims.

**Claimer:** This is a required additional statement to clarify areas that any other statement or implication may otherwise lead to misinterpretation. In this way it is similar to a disclaimer and very often claimers and disclaimers exist in the same sentence or paragraph in order to clarify which areas of work have what condition or status applied. Possible uses are wide in scope and important examples include statements of what work reported in a report (or other transmission) is accredited and what is not, which areas or aspects of work were carried out by a subcontractor, which by a client and which by Urbaser Limited.

#### 8.21 Disclaimers required

- Accreditations that are available for the type of work carried out but for which accreditation is not held must be disclaimed so as not to imply by association with the UKAS/BSI logo and or with information about what Urbaser Limited is accredited for
- Opinions and Interpretations are outside the scope of work

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## 9. Performance Evaluation

### 9.1 Customer (Client) satisfaction & complaint procedure

One of the measurements of the Quality Management System's performances is a constant analysis of customer (client) perception as to whether the organisation has fulfilled customer (client) requirements. Urbaser operate/interact mainly with Local Councils over a medium / long period of time (2 to 15 years or over) and Counties (20 years and over) for waste treatment operations including energy from waste. Local Authority feedback for satisfaction will be on continuous basis via meetings and constant interaction between the parties. Urbaser will look at feedback for the end beneficiary of our services; the general public. Street cleansing and collecting operations will be scored by the public on a customer satisfaction questionnaire that will seek to maximise the productivity of the interrelationships between Urbaser Ltd, our partners and residents alike.

Urbaser recognises the vital importance of achieving high standards in customer care during the delivery of all waste management services, but in particular those with a direct public interface. In our municipal services contracts we seek to ensure that they are all managed to the highest possible standard to increase customer satisfaction and reduce complaints. To ensure that operational excellence is achieved and maintained uniformly across the service we have in place a Customer Services Policy which sits within our Integrated Management System (IMS).

- We aim for Service Excellence
- We will be honest
- We will answer all telephone calls as soon as possible
- We will acknowledge all written correspondence within 5 working days, whilst full responses to all correspondences will be provided within 10 working days
- We have a robust procedure for handling complaints
- We will undertake annual Satisfaction Surveys (or as required)

#### Management and rectification of complaints

In the case of serious complaints from clients the Managing Director should be informed. In all cases the QHSE Manager must be informed. Serious complaints via letter or e-mail transmission should be cross-referenced in the Non-Conformity Report or complaints register together with the information that will enable it to be re-found for assessment.

Urbaser's IMS includes specific procedures to monitor and manage all compliments, comments and complaints arising from all stakeholders including the public, customers or other sources.

Urbaser will:

- Align our approach to dealing with complaints, comments and compliments with the complaint procedures to ensure a consistent approach
- Invite feedback from residents, businesses and stakeholders both in an ongoing manner and through Customer Satisfaction surveys
- Be effective in responding to enquiries and complaints by implementing the agreed procedures within the contract documentation
- Agree a protocol with the Client to record, measure, monitor, analyse and report to the them all enquiries and complaints
- Use the information and feedback provided by residents, business and stakeholders to actively seek to limit the number of complaints and ensure continual improvement of the overall level of service

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## Complaints Process

Urbaser operates a three stage process for responding to complaints:

Stage 1 – initial complaint received through any communication format. The complaint will be acknowledged within 5 working days and responded to within 10 working days.

Stage 2 – if the response to Stage 1 is not deemed satisfactory by the complainant, an investigation will be made by the Contract Manager and their findings reported to the complainant within 20 working days.

Stage 3 – if the Contract Manager's response at Stage 2 is still deemed unsatisfactory then the matter will be referred to Urbaser's Managing Director who will issue a final response within 10 working days.

All compliments, comments, or complaints received whilst on-duty will be logged by Urbaser using a form or register which will be adapted to reflect the Clients requirements. It is likely to include the following information:

- Time and date of complaint or enquiry received
- Location at which the complaint or enquiry was received
- Method of receipt
- Recipient
- Responsible Manager
- Name and contact details of complainant or enquirer (Originator)
- Reporting classification (e.g. Compliment, Complaint, Enquiry)
- Nature of complaint or enquiry

In all cases Urbaser will record details of the actions, if any, that are to be or have been taken in the complaint recording system. This will form part of the monthly report to the Client. Urbaser will keep the Client informed if the complaint will take longer than 10 working days to resolve and advise accordingly on the expected resolution timescales.

The weekly or fortnightly meetings between the Contract Manager, Supervisors (if necessary) and Client to discuss routine operational performance will be used as the forum to discuss ongoing complaints and issues of dispute.

For those complaints where there is no fault but where a service improvement opportunity has been identified, the details will be included in the Annual Service Report for consideration by the Client. Where it is agreed that possible improvements may require an immediate decision or can be undertaken at no cost, the Client may wish to bring about a decision on service change through the monthly manager's liaison meetings. Urbaser will, if agreed, implement such changes in accordance with an approved timetable.

If a corrective measure has been taken and Urbaser continues to receive complaints, we will enter into further dialogue with the complainant to ensure a full understanding of the issue and agree on what would be the most appropriate corrective measure. While we do not anticipate this type of incident it serves as good practice to engage

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the complainant in agreeing on a way forward. In this way, we involve the community in delivering a quality service and our customers gain a degree of ownership over the continual improvement programme.

Following the resolution of a complaint, we will make contact with the originator 1 month from the date of the resolution to seek feedback on the complaints and resolution process. This feedback will be logged and analysed during monthly and annual reviews to enable continual improvement.

### **Complaints from the Client**

Urbaser will ensure that all Client comments are considered and will review the service in light of them. Urbaser will record and deal with all enquiries and complaints efficiently and effectively and implement corrective actions at the earliest opportunity.

Urbaser's complaints procedures will define:

- How the Client will communicate the issue;
- To whom the Client should complain;
- How the Client is given a copy of the complaints procedure; and
- Once a complaint has been made, the person complaining is told in writing how the complaint will be handled and within what timescale they will be given an initial and / or substantive response.

Urbaser operates to the same timescales for Client complaints as set out in the three stage process described earlier.

In responding to an enquiry or complaint, Urbaser will ensure that it offers a full explanation and assurances for the future. Where there has been a complaint, Urbaser will also provide the Client with details of the action taken as a result of the complaint. Urbaser will investigate all complaints fully and fairly and will always endeavour to resolve a complaint using its own formal procedures. If the Client is not satisfied with Urbaser's response, we will aim to resolve any outstanding issues within an agreed timeframe.

The efficiency with which Urbaser has responded and resolved issues will be reviewed with the Client at monthly manager's liaison meetings.

### **Quality Assurance procedures**

All enquiries and complaints are logged within a contract specific Complaint Log Database and sent to the Quality, Health, Safety, and Environmental (QSHE) team on a monthly basis. The enquiries and complaints are then compiled into the QSHE Report where the complaints are categorised on the basis of contract and type, such as customer care, poor performance standards or not following procedures.

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The QSHE Manager will then analyse this information for trends on contracts or across contracts and these will be discussed at the Monthly Managers Meetings between the QSHE Manager, Business Development Manager, Operations Manager and Contract Managers. Measures will be identified to prevent reoccurrence of complaints and where possible, these mitigation procedures will be rolled out across all contracts to ensure a consistent approach to our operations.

A review of the mitigation actions and their success will be conducted in subsequent Managers Meetings and the results will be recorded in the lessons log as part of Urbaser's Quality Assurance process. Should the number of complaints not decrease in the months following the mitigation action, a member of the QSHE team will conduct an independent audit of the contract and further action will be taken as necessary.

### Mitigation actions

As part of Urbaser's Continuous Improvement programme, we seek to learn from complaints received in either of two ways. This is led by our QSHE team:

1. Staff – if the complaint relates to a staffing issue such as poor customer care or poor performance standards, refresher training will be provided to staff. This will be in the form of a Toolbox Talk that will be provided to the appropriate staff who will sign the attendance sheet to confirm they have had the training. However should the complaint be more serious in nature, Urbaser will follow the company Disciplinary Procedure.
2. Change in procedure – should there be repeated complaints, it may be that there is a systematic failure and that a procedure will need to be amended. Where this is the case, a new Risk Assessment will be undertaken by the relevant QSHE or contract staff member and accompanying Safe System of Work (SSW) produced. This will be distributed to staff who will sign to confirm they have read and understood the new documents. Any new plant, equipment, or PPE required will be provided to comply with the SSW.

### 9.2 Monitoring and measurement of processes

In an effective organisation, assignments and projects are monitored continually. Monitoring means consistently measuring performance and providing ongoing feedback to employees and work groups progress in reaching set goals. Regulatory requirements for monitoring performance include conducting progress reviews with employees where their performance is compared against their pre-set goals and standard operating procedures. Ongoing monitoring provides the opportunity to check how well employees are meeting predetermined standards and to make changes to unrealistic or problematic standards. By monitoring continually, unacceptable performance can be identified at any time during the appraisal period and assistance provided to address such performance rather than waiting until the end of the appraisal period when summary rating levels are assigned. According to the associated production procedures, work instructions constitute the quality and inspection plan for each order.

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### 9.3 Analysis of data

As well as monitoring activities, the Top Management of Urbaser Limited will collect and analyse data to determine system suitability and effectiveness so that improvements can be made. The data analysis will provide information on customer satisfaction and dissatisfaction, conformance to Client requirements, service characteristics, their trends, and suppliers. Data demonstrating the suitability and effectiveness of the Quality Management System as well as that used to evaluate the continual improvement of the Quality Management System is presented and reviewed during management review meetings.

Analysis of data will include: customer satisfaction levels, conformity of products to requirements, characteristics, and trends of processes and products including opportunities for preventative action, supplier performance, RIDDOR analysis, environmental monitoring, audits trends, and accident types. Only critical suppliers and Subcontractors will be audited

### 9.4 Improvements

Urbaser Limited continually improves the effectiveness of its Integrated Management Systems through the use of its quality policy, quality objectives, audits results, analysis of data, corrective and preventative action, and its analysis of data.

### 9.5 Internal audit

Urbaser Limited plans, implement and maintain a system of internal audits at planned intervals to ensure compliance of the IMS with the Organization's own requirements and with the International Standards of reference. Likewise, the Organization must plan external audits to ensure the maintenance of the Certifications under the International Standards of reference. The Company QHSE Director, as decided, shall prepare annually the PIN-04-CORP-D01 IMS Audit Program, which shall include the companies and work centers to be internally audited, trying, as far as possible, to internally audit the scope of the Country or Company's certificate in a 3-year cycle.

Specifically to ISO 9001:2015 Urbaser Limited conducts internal audits at planned intervals to determine whether the Quality Management System conforms to the planned arrangements, the requirements of the International Standards and to the Integrated Management System requirements established by the organisation are effectively implemented and maintained. An audit program has been designed and implemented and identifies an audit schedule based on the importance of the areas to be audited, as well as the results of previous audits. The audit criteria, scope, frequency, methods, responsibilities, requirements for planning and conducting audits and for reporting and maintaining results are defined and documented in the Internal Audit procedure. The management responsible for the area being audite are responsible for ensuring that actions are taken without undue delay to eliminate detected nonconformities and their causes. Follow-up activities include the verification of the actions taken and the reporting of verified results. The auditor performing site audits for compliance evaluation and performance must have the audit accepted by the operative audited by means of date and signature. Acceptance in the same fashion should be acquired of the Line Manager / Supervisor of the department audited. The initials of the auditor and the progressive number are the identifier of the non-conformity and correlative corrective action. e.g. Gae Cristiano GC01, GC02

Preventative actions are not applicable to situations where problems have already been encountered for which non-conformity reporting or possible corrective actions are the appropriate routes. The objective of preventative action work is to actively reduce likelihood of one or more non-conformities occurring. It aims to identify and minimize risk before a non-conformity event. The application should not be limited and should cover all managerial and technical requirements. Trend analysis may be used but general common sense may also be a useful tool envisaging future non conformities. When a preventative action is to be used, action plans are recorded on a Preventative Action

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Report. Following actions, which detail who will do them and by when, effectiveness of the actions is monitored and also recorded on the Preventative Action Report. Procedures for identification, collection, indexing, access, filing, storage, maintenance and disposal of records must be maintained.

9.6 Audits as per PIN 04

All aspects of the Quality System are audited within each calendar year with some audits being carried out more often where appropriate. Planning and implementation of audits is the responsibility of the QHSE Manager. The audits are scheduled yearly in advance. Procedures are given on the specific audit forms in most cases, otherwise refer to the associated procedures or policy in the procedures Policy or quality Policy for the subject concerned (for these a general audit form is used). Refer to 'Quality System Audits'.

TASK / ACTIVITY	RESPONSIBLE
Create IMS Audit Programme PIN-04- CORP-D01	Country or Company QHSE Director
Execution of internal audits	Audit Team
Prepare IMS Internal Audit PIN-04- CORP-D02	Audit Team
Inform to Contract Manager about audit process	Audit Team

The Country or Company QHSE Manager will send a copy of the IMS Audit Program PIN-04-CORP-D01 to the Corporate QHSE Director so that he/she has basic information on internally audited sites and external audit scheduling. Extraordinary internal/external audits may be carried out when a serious problem is detected that may affect the IMS, or when significant changes occur in the Organization that make it necessary (in the applicable regulations, in the Policy or derived from the result of previous reviews that make it advisable). The audit team will visit the facilities or conduct remote internal audits and review the documentation associated with the IMS. As a result of the audit, the IMS Internal Audit Report PIN-04-CORP-D02 will be prepared, where deviations, observations, opportunities for improvement and audit notes will be reflected. The audit team will send a copy of the IMS Internal Audit Report PIN-04-CORP-D02 to the Contract Manager and, once signed by him/her, to the Country or Company QHSE Director. Print off the forms as and when required rather than re-copy previous copies in order to ensure you are using the latest version. Audits cover all aspects of ISO9001:2015 by covering all areas of this Quality Policy. Annual reviews of policies and of audits include this aspect.

The Auditor will give consideration to the necessary degree of parallel or vertical coverage during the audit. Audits are carried out as far as possible only by staff independent of the audited activities and must be authorised. Quality procedures themselves as carried out by the QHSE Manager will need to be carried out by a person suitably knowledgeable about procedures and their aims and objectives. When audit findings cast doubt on the effectiveness of the operations then Corrective Action will be carried out (see 4.9).

Follow-up check audits and / or other monitoring checks will verify and record the implementation and effectiveness of the corrective action taken. Check audits required are scheduled on the appropriate audit programme (refer to key sheet for the programme.) For re-check audits it may be necessary to make special visits to site. The QHSE Manager receives all completed audits and decides what, if any, corrective actions are required.

All completed audit sheets are kept in the audits file, kept with QHSE Manager, and a list of audits is available in electronic format in the QHSE folder of the company's server. Deviation from Statutory and approved procedures will be treated as non-conforming work.



#### 9.7 Subcontractor audits

Subcontractors should carry out their role in training their own personnel at least as well as those of Urbaser. Quality improvement procedures and effective management regimes will help ensure that subcontractors are compliant with the quality systems of Urbaser.

Urbaser Limited will conduct two types of audits on subcontractors

- Suitability Audit
- Scheduled Annual Audit

A Suitability audit is carried out upon appointment of the operatives / companies to which the work is subcontracted. In both cases Urbaser Limited will audit:

- Technical competence
- Qualification
- Training
- References
- Membership of professional bodies
- Accreditations
- Legal Status
- Pending Legal Proceeding



- Term and condition of engagement
- Logistic and Equipment

The Annual audit will review the works carried out as well as a review of the suitability audit outcomes.

In both cases the operatives / companies will have to adhere to the Quality policy and sign an agreement that they will work according to company's safe working methods throughout out the life cycle of the project.

Urbaser Limited policy requirements of the appointed Subcontractor will be based on the following principles:

- Quality monitoring of subcontractors
- Sufficient subcontractor management
- Ensuring adequate quality improvement arrangements are in place to cover all training offered, including any that is subcontracted
- Working in partnership with the subcontractor, sharing responsibility for quality improvement
- Complaints procedures
- Ensuring responsibilities are clearly defined, agreeing the division of responsibilities, for example: Regularly monitoring quality improvement arrangements of the subcontractor to ensure that they are working
- Working with subcontractors to review the effectiveness of their quality and improve them
- Holding live performance data that is regularly reviewed with the subcontractor (often monthly) to show overall performance
- Share good practice identified by the main contractor and other subcontractors
- Ongoing joint self-assessment events with subcontractors, sometimes as a group if more than one subcontractor
- Ensuring that the contract with the subcontractor clearly outlines quality improvement expectations
- Communicating with subcontractors frequently
- Building a relationship of mutual trust

Subcontractor Audit Policy		
Quality improvement tool	Main contract holder	Subcontractor
Procedures and internal audit	Checks and agrees that the subcontractor's procedures and internal audit system are at least satisfactory, covering key areas and monitors their use	Uses its own procedures for the key stages of the training process and use its own internal audit system
Feedback	Checks and agrees that the subcontractor's procedures to obtain feedback, produces what	Own feedback system that produces core feedback required by main contractor and leads to quality improvements



Subcontractor Audit Policy		
	is required for self-assessment and quality cycle. Occasionally obtains own feedback from learners / participants who receive training from the subcontractor	
Self-assessment	Reviews the subcontractor's self-assessment and uses it in own self-assessment. Along with subcontractor plays an active part in validation of findings	Thorough self-assessment process either separate or combined with main contract holder
Development or action plans	Routinely reviews progress of plans with the subcontractor, on at least a quarterly basis	Effectively uses plans to manage improvements to its subcontracted provision and reviews and updates them at least quarterly
Observation	Samples and carries out joint observations with the subcontractor to quality assure their observation system	Has its own system for observing subcontracted training and progress reviews

## 9.8 Management Review

### General as per PIN 05 & 06-08

The review assesses the continuing QMS suitability, adequacy and effectiveness, identifying opportunities for improvements and required changes. Records are maintained for each management review meeting. A hard copy set of minutes is also retained and archived.

Below are the QHSE topics discussed at the Yearly Managerial Review:

1. Results of Internal Audits
2. Customer satisfaction and feedback from interested parties
3. Performances of Staff
4. Status of Preventive and Corrective Actions
5. Follow up actions from previous Management Review
6. Changes in internal and external issues that are relevant to and that could also affect the quality system
7. Recommendation for Improvements
8. Improvement of the effectiveness of Quality Management systems and processes
9. Resources needed and adequacy of resources
10. Evaluation of compliance with applicable legal requirements and with other requirements to which the organisation subscribe



11. The results of participation and consultation
12. Relevant communication from external interested parties, including complaints
13. The environmental performance of the organisation
14. Changing in circumstances, including development in legal and other requirement related to its environmental aspect
15. Policy reviews
16. OH&S performance of organisation
17. The extent to which the objectives have been met
18. Status of incident Investigation
19. Changing in circumstances, including developments in legal and other requirements related to OH&S
20. Recommendation for Improvement
21. OH&S performances
22. OH&S policy and objective
23. Other elements of OH&S
24. Continual opportunity for Improvement
25. The effectiveness of action taken to address risks and opportunities
26. The performances of the external providers
27. Monitoring and measuring results

## 10. Improvements

### 10.1 Non-conformities and complaints

Whenever any aspect of work or other requirement documented by the QMS is not conformed to then this should be reported to the QHSE Manager. The QHSE Manager creates a Non-Conformity Report in the Non Conformities database. All applicable sections are completed. The QHSE Manager maintains the database contents and oversees the operability of the program. With reportable non-conformity and any errors found in any situation such as an error noticed by another member of staff, complaints from clients or other source then an assignment of Corrective Action is almost always applicable.

Non-conformities and complaints should be reported and processed quickly.

Non-conformities may include members of staff not carrying out their duties. Where this is within the Quality Management System any member may inform but a more senior member investigates and decides on actions. The Managing Director will be informed by report where appropriate.

Non Conformities are number and coded for the base of the location in where they raised.

Example:

HQ1,HQ2 / GOS01,GOS02 etc.

In the centralised audit database the code will be the initial of the auditor name and the number: example GC01 (Gae Cristiano 01)

The Audit database is a standalone unique database which cross references across the whole the organisation.

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## 10.2 Corrective action

Corrective action follows up non-conformity reporting and is applied when analysis of the non-conformity indicates a possible reoccurrence or there is general doubt about the compliance of operations with in-house procedures. Causes are determined and action are then decided upon. Corrective action aims to reduce the likelihood or re-occurrence.

The Corrective Action Report is used to document the corrective action required and other helpful information.

## 10.3 Selection and implementation of corrective action

The QHSE Manager will make his recommendation known and record it on the Non-Conformity report. The Managing Director or QHSE Manager can decide that a Corrective Action is required and that person will select and implement the action(s) to eliminate the problem to prevent reoccurrence. Cause analysis, details of employees, activities, documents, procedures, records, results and reports examined should be identified and recorded. Cause analysis is documented on the Non-Conformity report and indicates the correct corrective action to be deployed. The corrective action and timescale allocated for discharge will be appropriate to the seriousness and the risk of the non-conforming work identified. Where investigations reveal deficiencies in company procedure then the appropriate quality system documentation will be updated and all relevant employees informed. Additional audit(s) in the area(s) of deficiency may be appropriate, as directed by the QHSE Manager.

## 10.4 Monitoring of corrective actions

Corrective actions are to include planning and scheduling for follow-up monitoring. These are pre-assigned to the persons(s) required to do the monitoring or checks. These follow-up checks may be in the form of audits not presently forming part of the existing Audit Programme unless the audits happen to be pre-scheduled for the desired time period, though additional audits may be appropriate. If a non-audit check is to be carried out then details are written of the checks made and findings in the monitoring section of the corrective action report. If space is insufficient, then clear reference as to where continuation is should be made. This may be on the reverse side of the sheet. If an audit or number of audits is / are scheduled as a means of carrying out and recording such monitoring then the monitoring space on the corrective action report must refer to the schedule and location on the schedule of such audit and name the audit type (specific audit procedure name). The additional audits may be check audits wherein the relevant parts of the full audit procedure are carried out and these check audits may be programmed more than once in advance in order to prevent re-occurrence or obtain improved evaluation of any further action that may be required. The QHSE Manager is responsible for finalizing and verifying audits including associated corrective actions being complete.

## 10.5 Continual Improvement

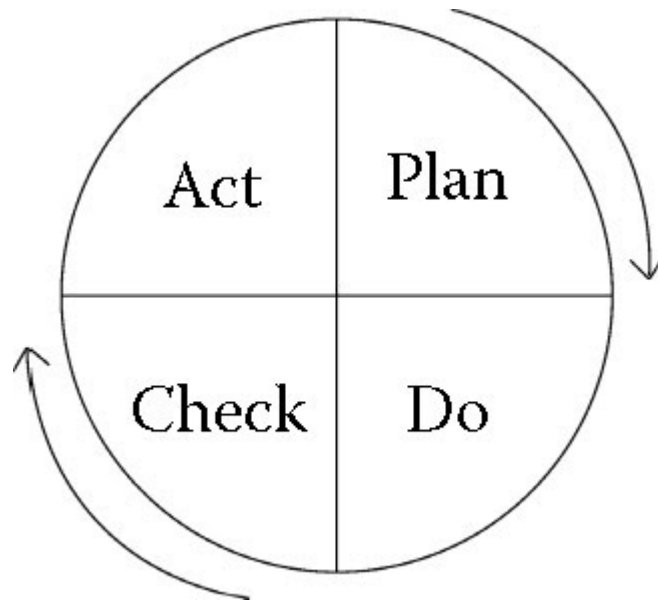
Urbaser Limited will continually improve the effectiveness of the QMS through use of the policies, objectives, audit results, analysis of data, corrective and preventative actions and management review. Continual improvement activities will be reviewed during management review meetings and will be documented on the Corrective Action form. Continuous improvement, in regard to organisational quality and performance, focuses on improving customer satisfaction through continuous and incremental improvements to processes including by removing unnecessary activities and variations. The plan-do-check-act cycle is a four-step model for carrying out change. Just as a circle has no end, the PDCA cycle should be repeated again and again for continuous improvement.

### When to use the model

1. When starting a new improvement project

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2. When developing a new or improved design of a process, product or service
3. When defining a repetitive work process
4. When planning data collection and analysis in order to verify and priorities problems or root causes
5. When implementing any change



### Procedure

1. **Plan.** Recognise an opportunity and plan a change
2. **Do.** Test the change. Carry out a small-scale study
3. **Check.** Review the test, analyse the results and identify what you've learned
4. **Act.** Take action based on what was learned in the check step. If the change did not work, go through the cycle again with a different plan. If you were successful, incorporate what was learned from the test into wider changes. Use what was learned to plan new improvements, beginning the cycle again

## 11. Stakeholder Register

The individual and parties that are the part of the organization is known as Internal Stakeholders. The parties or groups that are not a part of the organization, but gets affected by its activities is known as External Stakeholders. Holistically they serve the organization as a whole and they get influenced by the organization's work.

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The company's stakeholder register will serve as the external document to source to identify our external and External parties and complements and finalise our table in point 4.3. The stakeholder register will be the only document for reference to internal and external parties.

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