



Engineering  
GREAT the IMI Way



IMI plc  
**Health, Safety & Environment**  
Management Principles

# Health, Safety and Environment Management Principles

The following Management Principles for Health, Safety and Environmental Compliance are intended to be the basis upon which all IMI businesses can build their own specific programmes.

These Principles are important and compliance is expected by Divisional and site management in order to provide a safe work place for every employee, to protect IMI property, to protect the environment, to keep the IMI business in continuous operation, and ensure a consistent application across all businesses.

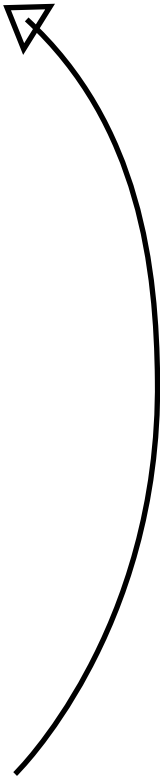
Newly acquired businesses are required to comply with these principles with a plan for adherence to be developed and implemented with a firm time commitment as well as accountability and responsibility for the plan.

The IMI Executive team endorses these principles.

A handwritten signature in black ink, appearing to read 'Mark Selway', with a stylized flourish at the end.

**Mark Selway**, Chief Executive, IMI plc

# IMI Group Principles, Policies and Standards Development Process



# Principles for Health, Safety, and Environmental Compliance

These principles represent the foundation for the health and safety and environmental management programmes of all IMI facilities. They are intended to promote continuous improvement in all of these areas.

Two of our principal commitments are:

**To safeguard the health, safety and welfare of all employees**

**To minimise our impact on the local and wider environment**

IMI will not compromise on these important matters. Paying attention to these issues makes for a better workplace and shows our concern for one another, our business partners and the environment.

A safe and healthy workplace increases our productivity, helps focus our energies on meeting customer needs, provides engineering advantage and drives the Company forward.



To support these commitments, IMI business leaders - supported by all employees - are required to ensure we will:

- At a minimum meet, or exceed, all health, safety and environmental laws and regulations in the countries where we operate, and the specific health, safety and environmental rules, requirements and procedures of IMI.
- Ensure that all employees understand their responsibilities and seek ways to improve performance related to health, safety and environmental protection.
- Align company operations with excellent practices in workplace health, safety and environmental protection.
- Identify and address risks and associated hazards to provide safe working conditions and to prevent pollution.
- Report and analyse hazards and work-related near misses, investigating root causes of any accident or near miss, minimising related hazards and finding better ways to reduce the number and severity of personal accidents and environmental incidents.
- Ensure that the health, safety and environmental impacts of our products and processes are reduced to a minimum.
- Use opportunities from health, safety and environmental improvements in products and processes for wider business benefits, such as optimising energy and the efficient use of resources, particularly with regard to CO<sub>2</sub> emissions.
- Continually improve our management and performance in these areas by setting objectives, targets and plans.
- Facilitate communication, co-operation, education and training to maximise the contribution of all employees to the achievement of high standards in health, safety and environmental matters.
- Require contractors and other visitors to comply with all relevant health, safety and environmental requirements when on IMI premises or when they are acting on IMI's behalf externally.
- Implement and follow company policies and procedures regarding use of alcohol, drugs or medications during business hours, and never allowing these substances to affect the safety of any employee or other person.

If you are in any doubt about the policies and procedures that apply to you or your colleagues and your business unit, please contact your local health, safety and environment manager or your line manager.

# Engagement in the Policies for Health, Safety, and Environmental Compliance

The IMI Board has specifically endorsed these policies and requires all businesses and employees to comply with them. It is the responsibility of each and every employee to implement, comply and work to improve the policies as outlined in this handbook. Compliance is an important measurement of all employee performance.

## Roles & Responsibilities

**IMI Executive Committee:** responsible for the oversight of the policy, reports to the Board

**IMI Divisional Managing Directors:** corporate responsibility for health, safety and environmental matters

**Managing Directors:** responsible for ensuring policy implementation in their operations

**All Employees:** expected to comply with established rules and procedures as a condition of employment

This covers all of IMI's businesses and other businesses that may impact IMI.

## The Management Team

### At Divisional Level:

IMI facilities shall be designed and operated to prevent losses and/or the interruption of business.

Divisional Managing Directors and managing directors must take a clear, visible and active leadership role throughout their business.

Additionally an executive team member must be identified for health, safety and environment responsibilities.

Divisional Managing Directors are responsible for ensuring that the corporate requirements have been implemented at all their Divisional locations. Each Division is required to establish a schedule identifying the person(s) responsible for health, safety and environmental matters at each site with contact details. This is to be updated at least annually or when authority or responsibility changes occur.

### At individual site level:

All locations are required to have a designated Executive responsible at the most senior level for health, safety and environment.

Health, safety and environment is the responsibility of the site Managing director or leader – who will have ultimate responsibility at that site. A management team member must be identified as being responsible for coordinating health, safety and environment activities.

Site Management is responsible for ensuring that the Group requirements have been implemented at their location. They are expected to develop and regularly assess and audit their own specific procedures, and to develop detailed plans for their workplace that are consistent with these principles and applicable government regulations. Additionally management has a responsibility to evaluate and control all process changes and work procedures in order to maintain a safe, secure work environment with proper equipment and adequate training.

IMI employees shall work in such a manner as to prevent incidents which result in personal injury, illness or damage/loss of assets. Incidents are to be investigated, documented and corrective action taken.

### Evaluation

Management review of health, safety and environment performance is required on a routine basis and at least monthly in all individual business/site management meetings and team briefings. Appropriate monitoring, reporting and performance reviews will include both preventive information (including progress on training, key initiatives and other identified metrics – e.g. number/status of risk assessments) as well as incident management.

### Training

All team members specifically defined at each site as responsible for health, safety and environment activities must be appropriately trained and adequately resourced.

Site management will provide appropriate training where employees can continue to develop their knowledge and skills and, as a result, improve health, safety and environment performance for the company. Training on health, safety, and environment matters must also be extended to all employees according to minimum regulatory standards or as defined by IMI.

In order to assist each facility in performing these responsibilities, the Group intranet section for Health, Safety and Environment identifies the required policies and procedures in health and safety and we encourage every business to access it for consistent application, interpretation, and implementation of these principles.

### Communication and reporting

Businesses must communicate health, safety and environment performance with all employees. The use of health and safety committees, briefing sessions, and notice boards, will be among the approaches taken.

Additionally a health, safety, and environment update is required in all monthly/quarterly business reports submitted to Group.

### Emergency Management

Each location is required to develop and maintain a local Emergency Response Plan to minimise the impact of any incident on business operations.



Each location is required to establish a health and safety programme designed to maintain a safe and healthy work environment and reduce health and safety risks within operations for employees, contractors, and visitors, and in compliance with applicable rules and regulations.

## Health and Safety Management Policies

### Health and Safety Manual

Each location is required to develop a written health and safety manual readily available for all employees, which includes management commitment and assignment of responsibilities as follows:

- safety communication systems with employees;
- a system for assuring employee compliance with safe work practices;
- scheduled inspection/evaluation system;
- accident investigation; procedures for correcting unsafe conditions;
- safety and health training and instructions;
- record-keeping and documentation.

### Safety committees

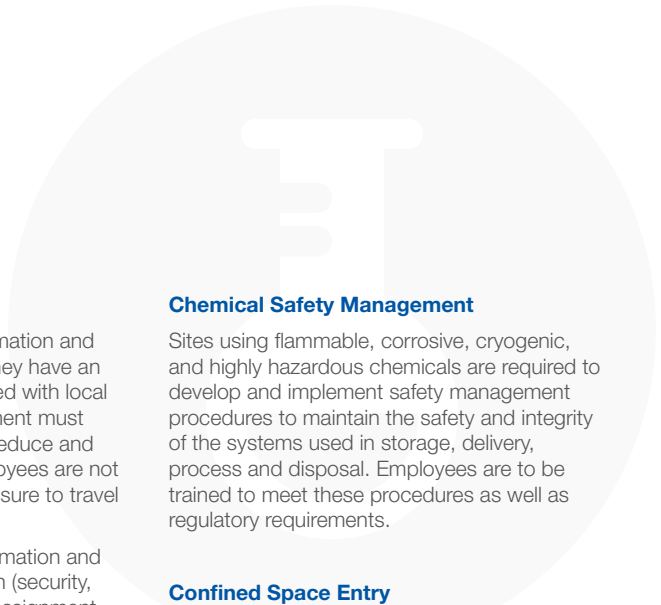
Procedures must be formulated to ensure that each manufacturing site has a safety committee. The role of the committee will include safety promotion, improvement opportunities, investigation of accidents/incidents and near miss/hazard reporting. A safety committee should consist of an equal membership of management and workers.

### Health and safety risk assessments

Each business is required to conduct a health and safety risk assessment programme in compliance with local regulatory requirements to identify and control health and safety risks within the business. These assessments are to be carried out as follows:

- on all processes/practices and reviewed at least every two years;
- in the event of any material change in process or introduction of a new process or practice;
- as required by local health and safety regulations;
- assessments are required to be carried out by a trained person (e.g. the supervisor or line manager) with support from employees working on the job/task concerned.
- the manager should provide advice and training on how to perform properly and complete a health and safety risk assessment, which has to be documented following the IMI group standard (GRP-HS5-020), and a local tracking mechanism to be maintained – including targets for completion/update.





### **Travel Risk Management**

The programme must provide information and guidance to management so that they have an understanding of the risks associated with local and global travel. Equally, management must understand the actions needed to reduce and manage these risks to ensure employees are not put under any direct or indirect pressure to travel when it is not safe to do so.

This programme must include: information and training, country-specific information (security, political, health, and business), on-assignment procedures, tracking of employees during assignments and incident response procedures for high risk countries in order to provide adequate employee protection whilst they are travelling on business.

### **Incident/Accident Investigation**

Management is required to have procedures in place to carry out incident and/or accident investigations, including near miss and hazard reports. It will be dependent on the severity of the subject as to the level of management involved but adequate investigation training should be given to nominated personnel and management. All incidents must be reported to IMI. In addition, all major incidents must be communicated through the IMI Major Incident Reporting Procedure.

### **Chemical Safety Management**

Sites using flammable, corrosive, cryogenic, and highly hazardous chemicals are required to develop and implement safety management procedures to maintain the safety and integrity of the systems used in storage, delivery, process and disposal. Employees are to be trained to meet these procedures as well as regulatory requirements.

### **Confined Space Entry**

Procedures are required to be established and enforced for safe entry into tanks, vessels, and other enclosed or confined spaces. Provisions will include requirements for written authorizations (permit required), toxicity, oxygen deficiency and explosive testing, ventilation, isolation, lockout/tagout, monitoring and rescue.

### **Contractor Safety**

Contractors and subcontractors are required to adopt and enforce the appropriate health, safety and environmental programmes to meet and/or exceed IMI requirements and be in full compliance with applicable rules and regulations while on site at IMI facilities. In order to reduce or eliminate the risks associated with contractor work in our facilities, a Contractor Safety Management programme is also required; including pre-qualification and evaluation of health, safety and environment performance.

## Electrical Safety

Procedures are required to ensure that no person is engaged in any electrical work activity unless they are suitably trained for the nature of the work. Procedures must be in place to verify the qualifications, as required by local legislation.

## Employee Training

Management is required to ensure that employees are provided with adequate health and safety training as follows:

- on induction into the business
- on being exposed to new or increased risks because of:
  - (a) being transferred or given a change of responsibility
  - (b) the introduction of new work equipment into or a change/modification to work equipment already in use
  - (c) the introduction of new technology
  - (d) the introduction of a new process or a change to an existing process.

Management is required to maintain a system of training performance (regulatory calendar, schedule of activities, training content) and to ensure that records are kept.

## Ergonomics

Procedures need to be established to develop and implement programmes that address ergonomic training, worksite analysis, and medical evaluation (as needed) to allow the employee to efficiently produce and distribute high-quality products safely in compliance with Group policy.

## Machinery Operations and Safety

Procedures for safe operation of machinery including:

- machinery risk assessments
- preventative maintenance programmes
- perimeter and point of operation guarding
- energy isolation and lockout/tagout for mechanical, electrical, pneumatic, gases, and liquid systems are required for the protection of personnel operating machinery. Furthermore, annual auditing must be performed to identify any gaps and improvement opportunities in compliance with Group policy.

## Hot Work

Procedures are required for the control of work or operation, outside permitted areas, of any equipment that may act as a source of ignition in areas where flammables and combustibles may be present (e.g. welding, cutting and grinding) and must include a hot work permit process.

## Industrial Hygiene Exposure Assessment Programme

Procedures are required for the detection, surveillance and control of potential health hazards, such as noise, chemical exposure, etc., which may affect the safety and health of the employee population for long term and short term exposures.

## Injury and Illness Management Programme

Local management is required to ensure that medical care is provided for the treatment of work-related injuries/illnesses. Procedures need to be established to protect employees from diseases transmitted by exposure to airborne contaminants, blood, and/or other body fluids.

### Inspections and Audits

Procedures are required to ensure that inspections and audits of the workplace are undertaken on a regular basis. These inspections and audits shall report, in writing, all non-conformities, those responsible for corrective actions, remediation and target completion dates.

### Lockout/Tagout Procedures

Procedures are required and enforced for the lockout/tagging and field testing of equipment prior to any work that may expose personnel to hazardous energy conditions e.g. electrical, mechanical, pneumatic, fluids, gases, etc. in compliance with Group policy.

### Motorized Handling Equipment

Procedures including training, certification and licensing are required for the safe operation of all motorized handling equipment including but not limited to forklifts, pallet jacks, work platforms, cranes and lifting accessories.

### Personal Protective Clothing and Equipment

Procedures and sufficient discipline are required for the wearing of general and specific personal protective equipment including a risk assessment to identify safety and health concerns and recommend appropriate PPE.

### Process Safety (Foundries, High Pressure Testing, Cryogenic Testing)

Safe operating procedures are required to ensure that processes are safe in their operation. Employees must be given suitable and sufficient training to ensure their safety at all times. Where specialist advice is not available at the location, management must seek external assistance in managing this requirement.

### HVAC Systems

All operating units with cooling towers must ensure that appropriate management systems are in place to prevent an outbreak of Legionnaires' disease.



Each location has a role and responsibility in both fostering and promoting sound environmental management. Environmental stewardship rests with every individual involved with IMI, from the initial concept, research and development, to manufacture, assembly, distribution, sale, use and disposal. All facilities are expected to be in compliance with applicable environmental rules and regulations.

## Environmental Management Policies

### Environmental Policy and Management Systems

Each site is required to institute an environmental management system that will maintain compliance with applicable rules and regulations. All businesses must have an environmental policy that is implemented through a responsible manager and performance is audited on a regular basis (at least annually).

### Acquisition and sale of businesses and sites

The business divisions and IMI will undertake appropriate investigation of environmental matters during all merger and acquisition projects. Similarly, all divisions must ensure that all permits, licenses, etc. are surrendered in accordance with local laws when any site is closed.

### Product development

Processes must be in place to ensure that product development addresses environmental matters during the design phase as well as later in the development process. This is to include, but not be limited to, avoidance of hazardous materials, energy efficiency, efficient use of materials, and recyclability at the products' end of life.

### Energy/carbon management

All businesses are to implement a programme of energy efficiency/CO<sub>2</sub> emissions reduction. This programme should prioritise major energy consumption, be coordinated through divisional businesses and IMI's external and internal targets.

### Air

Procedures are required for each location to obtain all air use permits required by governmental authorities. Changes to equipment installation or manufacturing processes shall be evaluated for the potential need for new or revised air use permits. Fugitive emissions should also be monitored and, where possible, measured.



### Wastewater

All locations are required to maintain the proper sanitary process, and rain water practices that conform to the permitted release of waste water. The proper permits shall be maintained. Regular monitoring of wastewater discharges from the sites shall be undertaken as appropriate for the site concerned.

### Water consumption

All locations using water in production or site management processes (beyond normal 'domestic' uses) must implement a water conservation programme that includes measurement of use, identification of the principal water uses and the implementation of appropriate measures to minimise use. Businesses in areas where water resources are scarce or otherwise threatened must ensure that their water efficiency plans are particularly robust.

### Waste

Procedures are required to control environmental contamination by waste materials leaving any location. Activities to be controlled include: disposal of returned goods, any storage, segregation of hazardous from non-hazardous waste, segregation of recycling streams and management of waste containers to prevent the escape of any wastes or associated materials, for example, contaminated rainwater. The controls must also include the transportation, disposal, or treatment of waste. These procedures will conform to local government requirements. Management must ensure that waste contractors are fit and proper companies for their waste types and ensure that their waste is ultimately taken to a suitable approved disposal, recycling or treatment facility.

### Waste minimisation and recycling

Each location must have an appropriate programme in place to reduce the quantity of waste produced and to maximise the recycling of any waste that is produced. Other production efficiency projects such as 'Lean' and '5S' should incorporate waste minimisation activities.

### Use of solvents

All IMI businesses are to seek alternatives to the use of hydrocarbon based solvents in general. In particular, the use of chlorinated solvents is not permitted unless a formal, written exemption is granted by the appropriate Divisional Managing Director as a result of customer or technological requirements.

### Tanks and Piping

Installation of new underground storage tanks is not permitted. Piping and subsequent maintenance modifications shall conform to appropriate design, fabrication, installation, and documentation standards. Registration and inspection shall conform to applicable governmental requirements. Appropriate labeling (colour, size) must conform to standard industry practices as well as regulatory rules and regulations.

Tanks holding hydrocarbons (petroleum, oils and solvents) must have secondary containment such as double walls and/or bunding around the tanks or drum storage area. The secondary containment should contain any hoses or inlet/outlet taps or valves to the tank. Drums should also be stored on bundled pallets. Bunds should have the capacity of 110% of the largest tank/drum contained within it. Where practical, tanks and bunds should be covered to prevent rainwater getting into the bund.

## Leak and Spill Control/Containment

Locations shall install protective features and all facilities shall initiate procedures to minimise the potential for employee and public exposure to fire, explosion, gas leak, and chemical spill. Employees shall be trained in the appropriate spill/leak awareness and containment procedures where appropriate.

## Site drainage

All locations must maintain up-to-date site drainage plans that distinguish between foul and storm water drainage and indicate location of any oil interceptors and the entry points into off-site sewerage and drainage systems. On-site drain covers should be coloured to distinguish between foul (sanitary) and storm water drains; typically red = foul and blue = storm.

## Hazard Communication Programme

Each location shall identify and list the chemical, physical, toxicological, radioactive, and reactive properties of all hazardous materials utilised or produced at that location and communicate this information to appropriate workers as part of the Hazard Communication Programme. This programme shall meet all local government requirements for communicating hazards to employees including the management of material safety data.

## Asbestos

IMI operations are strictly forbidden from using materials containing asbestos in their products. Furthermore, each location is required to perform an asbestos survey to identify where asbestos is present, or is likely to be present, to ensure that appropriate management systems are in place to guarantee compliance with national, state and or local legislation and prevent exposure or recommend remediation.





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