


Business Management System Manual

BMS001

Fine Tubes Limited

Senior Management Team Commitment

Position	Print Name	Signature	Date
Director of Operations	Paul O'Gara		19/2/25
Director of Quality and Technical	Thomas Vilaro		18.02.25
Director of Engineering and Technology	John Rooney		18-2-25
Director of Commercial	Martin Brear		20/02/25
EHS Manager	Mathew Davies		18/2/25
HR Manager	Claire Baker		18/02/25.
Production Manager	Craig Hart		26.2.25
Key Equipment & Facilities Manager	Peter Brown		26/02/25.
Supply Chain Manager	Philip Gimingham		27/2/25
Planning/Sales Interface Manager	Mark Ayers		18/02/25
CI Manager	Dan Riden		18/2/25
Financial Controller	Lee Johns		25/2/25

CONTENTS

Page

History of the company.....	3
Scope.....	4
Normative references	5
Terms and Definitions	5
Context of the Organisation.....	7
Understanding the organisation and its context.....	7
Understanding the needs and expectations of workers and other interested parties	8
BMS Manual.....	8
Control of Documents.....	8
Documentation Requirements of the BMS.....	9
Control of Records	9
Organisational roles, responsibilities and authorities.....	10
Fine Tubes Ltd - Core Values	11
Consultation and Participation of Workers.....	12
Leadership.....	12
BMS Policy.....	14
Actions to address risks and opportunities.....	14
Risk and Opportunity Planning	14
Determination of Legal and Other requirements	16
BMS Objectives	17
Planning to Achieve BMS Objectives	17
Resources	17
Competence.....	18
Awareness.....	18
Internal communication.....	20
External Communication.....	20
Operation	20
Operational Planning and Control.....	20
Operational Risk Management	21
Configuration Management.....	21
Product Safety.....	21
Prevention of counterfeit parts.....	22

Management of Change.....	22
Procurement	22
Emergency Preparedness and Response	23
Determining the Requirements for Products and Services.....	23
Review of the Requirements for Products and Services	24
Design and Development of Products and Services	24
Monitoring, Measurement, Analysis and Performance evaluation	24
Customer Satisfaction	25
Analysis and Evaluation.....	25
Internal Audits.....	25
Management Review	26
Continual Improvement.....	27
Incident, non-Conformity and Corrective Action.....	27
Amendments.....	28

History of the company

Fine Tubes Ltd was registered in 1943 as a subsidiary of Moray Engineering Company limited, and situated at Surbiton, Surrey. The main product at this time was Cathodes from Nickel Alloys for the electronics Industries.

In 1953, the Company increased its manufacturing capabilities to encompass tube drawing, using mainly Nickel materials.

Also, at this time, Superior Tube Company of Norristown, Pennsylvania, USA acquired a major interest in Fine Tubes Ltd who, in turn, became the parent company to Moray Engineering Company Limited. Ownership migrated to Superior Group Inc. with Superior Tube Co and Fine Tubes Ltd remaining as sister companies.

During 1957, Fine Tubes Ltd commenced processing tubing in the Stainless-Steel grades from material supplied from Superior Tube Company and entered the field of Aircraft Hydraulic tubing. The resulting business acquired a steady increase in capacity from 1958 to 1959 culminating in the decision to build a new modern tube mill in Plymouth, Devon UK, where production commenced in 1962.

In 2015 Ametek Inc. acquired Fine Tubes Ltd and Superior Tubes to enhance the Precision Tube and Strip sector of the Speciality Metals Group within the Ametek Electromechanical Group.

The Plymouth site now has 30000m² of production facilities on a total area of 65000m².

Tube is produced by two methods, Pilgered and cold-drawn seamless or longitudinally welded. For seamless tube raw material is purchased as extruded hollows or bored out bars in a range of sizes. This material is then progressively cold reduced by pilgering and drawing to final size. Welded tube is produced from flat strip, formed, and longitudinally welded. Longer lengths can be produced by orbital welding coils

of tube together. Additional processes available are heat treatment, pickling, polishing, chemical milling, and cutting, cleaning, and printing.

The Quality Management System was introduced into Fine Tubes Ltd in 1975 and is regularly audited, internally according to the Internal Audit programme, and externally by Customers and Approval/Regulatory bodies, including, but not limited to BSI and TUV.

Fine Tubes Ltd.'s special processes are regularly reviewed and approved by the Performance Review Institute in accordance with the requirements of the relevant Nadcap commodities.

The Environmental Management System was introduced in 2016 and the Occupational Health and Safety system introduced in 2020, complying with ISO 14001:2015 and ISO 45001:2018 standards. These are audited both internally and externally.

Process control systems and full test facilities are available to ensure that material meets required specifications.

Today Fine Tubes Ltd is one of the major manufacturers of precision tubing in stainless steel, nickel alloys and titanium alloys.

This tubing is supplied to meet a range of specialist markets including, but not limited to:

- Nuclear fuel cladding,
- Aircraft tubing for both engine and airframe use.
- Oilfield installations of both control line and instrumentation tubing.
- Medical device raw material, both general medical and implant type.
- Clean bore tubing used for semiconductor manufacturing plant installations and HPLC applications.
- General commercial and equipment tubing.

The combined integrated management system was formulated and documented, in this BMS Manual, as of 2023.

Scope

Fine Tubes Ltd has determined the scope of the BMS system as follows:

The manufacturing and in-house testing of cold finished precision tubes in Stainless Steel, Nickel, and Titanium alloys for critical applications in Aerospace, Nuclear, Oil & Gas, Chemical and Medical industries. The system has been developed to meet multiple standards including, but not limited to, AS9100, ISO 9001, ISO 14001, ISO 45001, and various customer requirements.

The company has determined the boundaries and applicability of the business management system to establish the scope. Consideration has been given to internal and external issues, requirements of workers and interested parties and planned or performed work-related activities. The company has considered activities and services within the organisation's control that can influence performance.

This manual describes the business management system in operation within Fine Tubes Ltd to control and ensure that all business risks will not have any detrimental effect upon its products & services, employees, environment or interested parties.

The strategic direction of Fine Tubes Ltd is to maintain its commitment to the provision of sound health, safety and environmental principles in the development and maintenance of its operations, products & services for the benefit of all.

To assist with the outcomes of the Business Management System and consistent with the BMS policy, the system will include:

- Continual improvement/Enhancement of BMS performance.
- Fulfilment of legal requirements and other requirements.
- Achievement of BMS objectives.

To ensure this, Fine Tubes Ltd is committed to providing the necessary resources and setting the necessary objectives, including continuous improvement and prevention of pollution, to minimise, and if possible, eliminate OHS risks and environmental impacts. Fine Tubes Ltd will ensure that noise levels emitted by plant and equipment both within the company premises and beyond the company boundaries, do not present any OHS risk or environmental impact on both employees and neighbours of the organisation.

Fine Tubes Ltd ensure that the generation of solid waste, liquid effluent, and aqueous discharges, together with emissions to the atmosphere, are controlled and included within the Policy to prevent odour, pollution, noise, and other potential nuisance, relating to activities. This protocol is extended to cover the suppliers of raw material who follow their own EHS policies and procedures.

PESTLE analysis is carried out, and reviewed annually, to ensure all external and internal business environments, and the possible impacts on the performance of our business have been considered. The BMS Manual, including the BMS Policy, will be available for examination on request by any interested party.

Normative references

A matrix of procedures, highlighting the relevant clause they fulfil, from each appropriate standard, is contained within the 'BMS Matrix' controlled spreadsheet, within the Fine Tubes Ltd computer network.

Associated external documents/standards are, but not limited to:-

AS9100, ISO 14001, ISO 45001.

Terms and Definitions

1	Business Management System (BMS)	A set of interrelated or interacting elements of an organisation to establish policies and objectives and processes to achieve those objectives
2	Policy	intentions and direction of an organisation, as formally expressed by its top management
3	Environmental Management System (EMS)	Management system or part of a management system used to achieve EMS policy.
4	Occupational Health and Safety Management System (OHS)	Management system or part of a management system used to achieve OHS policy.
5	Objective	Result to be achieved

6	Continual/Continuous Improvement	Year-on-year enhancement of overall environmental performance, not necessarily in all areas of activity, resulting from continuous efforts to improve in line with environmental policy.
7	Injury and ill health	The adverse effect on the physical, mental or cognitive condition of a person
8	Environment	The surroundings and conditions in which a company operates, including living systems (human or otherwise) therein. Since it is recognised that the effects of the Fine Tubes Ltd activities may be world-wide the environment may extend from the workplace to the global system
9	Environmental Aspect	An element of the organisations' activities that can interact with the environment in either a beneficial or deleterious manner.
10	Environmental Impact	Any direct or indirect impact of the activities, products, and services of the company upon the environment whether adverse or beneficial.
11	Environmental Management Programme	"A description of the means of achieving environmental objectives and targets".
12	BMS Policy	The statement of the intent of actions that the company intend to take around business management. Policy to prevent work related injury and ill health to workers and to provide safe and healthy workplaces.
13	Targets	The detailed performance requirements which need to be met to achieve the business objectives.
14	Interested parties	Person or organisation that can affect, be affected by, or perceive itself to be affected by a decision or activity.
15	PESTLE Analysis	PESTLE stands for: Political, Economic, Social, Technological, Legal and Environment. PESTLE analysis is a fundamental tool for business strategy and planning. It is a method of assessing your business' environment and its possible impact on the performance of your company.
16	Worker	The person performing work- or work-related activities that are under the control of the organisation.
17	Participation	Involvement in decision making.
18	Consultation	Seeking views before deciding.
19	Workplace	Place under the control of the organisation where a person needs to be or to go for work purposes.
20	Contractor	An external organisation providing services to the organisation in accordance with agreed specifications, terms, and conditions.
21	Top Management	Person or group of people who directs and controls an organisation at the highest level.
22	Effectiveness	The extent to which planned activities are realized and planned results achieved
23	Hazard	Source with a potential to cause injury and ill health

24	Risk	The effect of uncertainty. Combination of the likelihood of occurrence of a work-related hazardous event or exposure and the severity of injury and ill health that can be caused by the event or exposure.
25	Opportunity	Circumstance or set of circumstances that can lead to improvement of BMS performance.
26	Outsource	To make an arrangement where an external organisation performs part of an organisation's function or process
27	Monitoring	To determine the status of a system, a process or an activity
28	Documented Information	Information which is required to be controlled and maintained by an organisation and the medium on which it is contained.
29	Process	Specified way to carry out an activity or process.
30	Performance	Performance related to the effectiveness of the prevention of injury and ill health to workers and the provision of safe and healthy workplaces.
31	Competence	The ability to apply knowledge and skills to achieve intended results
32	Incident	Occurrence arising out of, or during, work that could or does result in injury and ill health.
33	Corrective Action	Action to eliminate the causes of a non-conformity or an incident and to prevent a re-occurrence.

Context of the Organisation

A management system has been developed and documented to describe all business activities undertaken by Fine tubes Ltd, and these are structured to provide a basis for:

- A cost effective BMS.
- A system which complies with the appropriate standards and the stated aims of the company.
- The BMS Manual defines the management principles to ensure that the requirements of the standard and appropriate legislation are complied with.
- Risk assessments are carried out and have been classified as high, medium, or low risk.
- A programme of review and continuous improvement has been established to ensure that the BMS is dynamic. This includes a system for review to ensure that our state of requirements is being met and continuously improved.

Understanding the organisation and its context

Fine Tubes Ltd have determined external and internal issues that are relevant to its purpose and strategic direction that affect its ability to achieve the intended outcome(s) of the BMS.

Fine Tubes Ltd ensures that all its products are manufactured to fully meet the requirements of its customer's orders, specifications, and or documented instructions.

Fine Tubes Ltd manufactures tubing to customers' order requirements, drawings, or specifications as applicable and does not design or develop products so AS9100 Rev D Clause 8.3 design and development

of Products and Services is excluded from the Business Management system. Fine Tubes Ltd does develop manufacturing processes as required to achieve customers' product requirements.

Post-delivery activities are limited to resolving issues with nonconforming material.

Product Inspectors at Fine Tubes Ltd report into the Operations function of the business to ensure that customer requirements are met as effectively as possible. Independence and objectivity are maintained through a defined line of authority to the QA / Technical department.

Management of Risk to the achievement of applicable requirements is controlled through the Contract review processes, Product reviews, Technical Reviews, Control of Change and Risk Management processes. Operational risk uses PFMEA and similar risk management tools as appropriate.

Configuration management Clause is addressed at Fine Tubes Ltd through the strict use of product identity & traceability systems, internal production specifications, part number control systems and PWS revision controls.

A variety of statistical and analytical techniques are employed where applicable, to monitor and control processes.

Understanding the needs and expectations of workers and other interested parties

Fine Tubes Ltd have determined:

- the other interested parties, in addition to workers, that are relevant to the BMS
- the relevant needs and expectations (i.e. requirements) of workers and other interested parties;
- which of these needs and expectations are, or could become, legal requirements and other requirements.
- The need to provide customer access to applicable premises or working areas, including those of the sub-suppliers, for the purpose of surveillance, AHJ (Authority having jurisdiction) requirement, verification and audit.

BMS Manual

Fine Tubes Ltd have established, implemented, maintained and will continually improve the BMS including the processes needed and their interactions, in accordance with the requirements of this document.

Fine Tubes Ltd establishes and maintains the BMS manual that includes

- The scope of the BMS, including details of and justification for any exclusions.
- The documented procedures established for the BMS, or reference to them (refer to BMS Matrix), and
- A description of the interaction between the processes of the BMS (refer to the BMS Matrix).

Control of Documents

Fine Tubes Ltd controls the documents required by the BMS.

A documented procedure defines the controls needed to

- Approve documents for adequacy prior to issue.
- Review and update as necessary and re-approve documents.

- Ensure changes and current revision status of documents is identified.
- Ensure that documents remain legible and readily identifiable.
- Ensure that documents of external origin determined by Fine Tubes Ltd to be necessary for the planning and operation of the BMS are identified and their distribution controlled, and
- Prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose.

Documentation Requirements of the BMS

Fine Tubes Ltd documentation includes -

- Documented statements of a BMS policy and BMS objectives
- A BMS Manual
- Documented procedures and records as required by the relevant standards.
- Documents, including records, determined by Fine Tubes Ltd to be necessary to ensure the effective planning, operation and control of its processes thus ensure effectiveness.

When creating and updating documented information, Fine Tubes Ltd has ensured appropriate:

- Distribution, access, retrieval and use;
- It is available and suitable for use, where and when it is needed;
- Storage and preservation, including preservation of legibility;
- Control of changes (e.g. revision control);
- Retention and disposition.
- It is adequately protected (e.g. from loss of confidentiality, improper use or loss of integrity).
- Prevention of the unintended use of obsolete documented information by removal or by application of suitable identification or controls if kept for any purpose.

The Company will establish, implement, and maintain procedures to periodically evaluate compliance with legal or other requirements. The timescale for these evaluations will not be less than the requirements set out in any legally binding permit or authorisation. Records of the results of these evaluations will be kept for inspection by interested parties.

Documented information of external origin determined by Fine Tubes Ltd to be necessary for the planning and operation of the BMS shall be identified, as appropriate, and controlled.

Fine Tubes Ltd maintains documented information of its:

- Environmental aspects and associated environmental impacts
- Criteria used to determine its significant environmental aspects
- Significant environmental aspects

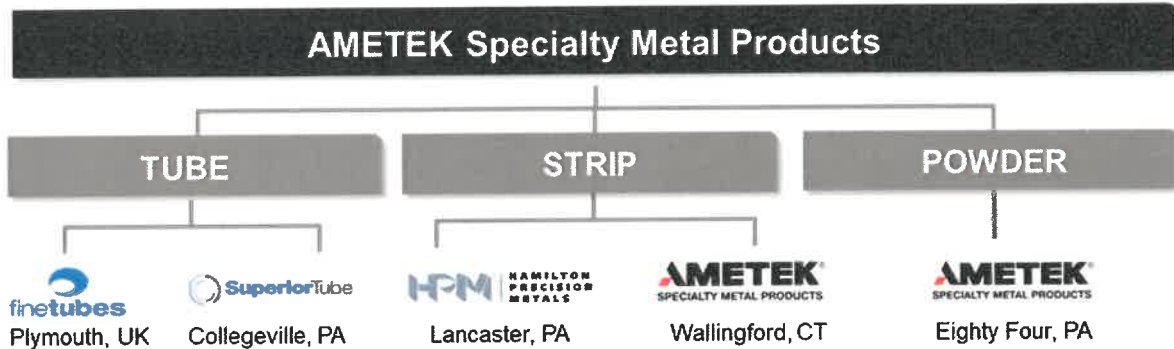
Control of Records

Fine Tubes Ltd have established a procedure to define the controls needed for the identification, storage, protection, retrieval, retention and disposition of records.

Records are required to remain legible, readily identifiable and retrievable.

Organisational roles, responsibilities and authorities

The current corporate ownership structure is as shown below -



Fine Tubes Ltd – Management Structure

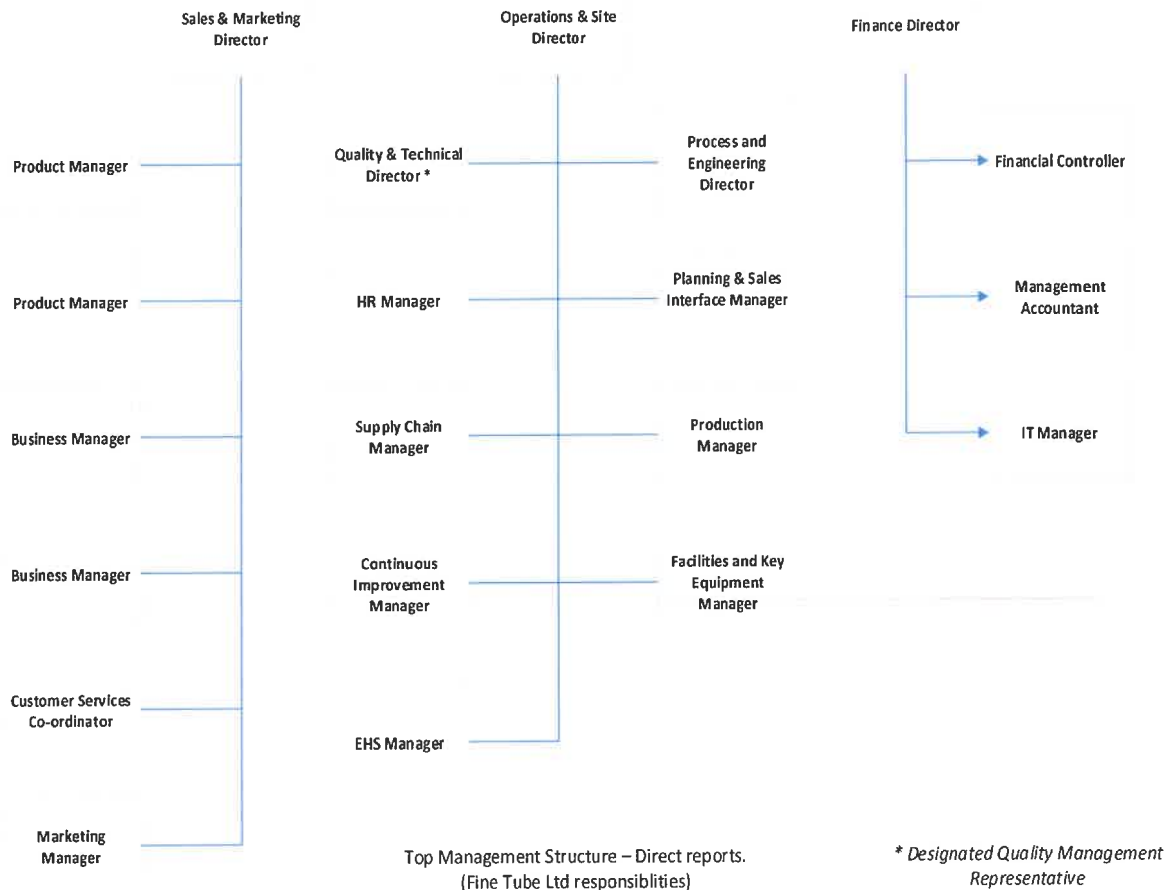
Fine Tubes Ltd has a top management structure, ensuring that roles, responsibilities and authorities for relevant roles are assigned, communicated and understood within the organisation.

Top management shall assign the responsibility and authority for:

- Ensuring that the BMS conforms to the requirements of this document and relevant standards;
- Ensure all processes deliver their intended outputs
- Reporting on the performance of the BMS and opportunities for improvement to top management.
- Ensure promotion of customer focus throughout Fine Tubes Ltd.
- Ensure the integrity of the BMS is maintained when changes are planned and implemented.

All workers have the responsibility to conform to the requirements of the BMS.

The Fine Tubes Ltd organisational structure is as below -



Fine Tubes Ltd - Core Values

At Ametek and Fine Tubes Ltd, there are five Core Values at the heart of our success:

- **Ethics and integrity** - Acting with the highest ethical standards is core to who we are. Reliably partnering with suppliers, providing growth opportunities for colleagues, delivering outstanding returns for shareholders, and supporting our communities through charitable donations and volunteerism.
- **Respect for the individual** – At Fine Tube Ltd we provide a safe work environment, creating a culture where employees feel comfortable sharing their ideas and perspectives. We are constantly looking for ways to further enhance our employees’ experience by offering advancement and development opportunities.
- **Diversity and Inclusion** - We believe the best ideas come from diverse groups of people working together in an inclusive workplace. Our approach to these essential criteria spans the entire employment lifecycle, which includes talent acquisition, learning and development, and retention and engagement.
- **Teamwork** - Our success is born from our collaborative spirit. Together, our teams deliver market-leading products through collaboration and sharing the best practices and ideas. Our high-performance teams provide a competitive edge that allows us to succeed in the markets we serve.

- **Social Responsibility** - As a global organisation, we recognize the positive impact we can make on society. We provide solutions that support our sustainability initiatives by reducing emissions, energy use and waste. Also, through the AMETEK Foundation, we support local charitable organisations.

Consultation and Participation of Workers

Fine Tubes Ltd establishes, implements and maintain a process(es) for consultation and participation of workers at all applicable levels and functions, and, where they exist, workers' representatives, in the development, planning, implementation, performance evaluation and actions for improvement of OH&S requirements within the BMS.

Fine Tubes Ltd:

- Provides mechanisms, time, training and resources necessary for consultation and participation;
- Provides timely access to clear, understandable and relevant information about the BMS;
- Determines and remove obstacles or barriers to participation and minimize those that cannot be removed;
- Emphasize the consultation of non-managerial workers on the following:
 - Determining the needs and expectations of interested parties.
 - Establishing the BMS
 - Assigning organisational roles, responsibilities and authorities, as applicable
 - Determining how to fulfil legal requirements and other requirements
 - Establishing BMS objectives and planning to achieve them
 - Determining applicable controls for outsourcing, procurement and contractors.
 - Determining what needs to be monitored, measured and evaluated;
 - Planning, establishing, implementing and maintaining an audit programme(s)
 - Ensuring continual improvement
- Emphasize the participation of non-managerial workers in the following:
 - Determining the mechanisms for their consultation and participation;
 - Identifying hazards and assessing risks and opportunities
 - Determining actions to eliminate hazards and reduce BMS risks
 - Determining competence requirements, training needs, training and evaluating training.
 - Determining what needs to be communicated and how this will be done
 - Determining control measures and their effective implementation and use
 - Investigating incidents and nonconformities and determining corrective actions

Leadership

The management team will demonstrate leadership and commitment to the BMS by.

- Taking overall responsibility and accountability for the BMS by covering elements such as prevention of work-related accidents & ill health, provision of safe & healthy workplaces and activities, the environmental management system and the effectiveness of the QMS.
- Promote a healthy 'safety culture' at Fine Tubes by ensuring workers understand their role and responsibilities in maintaining and improving the 'safety culture'.
- To ensure the BMS policy and objectives are established and are compatible with the context and strategic direction of Fine Tubes Ltd.

- Ensuring the integration of the BMS requirements into Fine Tubes Ltd business processes;
- Promoting the 'use of experience' (gained within the suppliers business, by other suppliers, and by customers) in all areas of Fine Tubes. This includes ensuring identification and collection, reviewing for relevance and significance and implementing through action to prevent recurrence.
- Promoting the use of risk-based thinking;
- Ensuring that the resources needed to establish, implement, maintain and improve the BMS are available;
- Communicating the importance of effective BMS management and of conforming to the BMS requirements;
- Ensuring that the BMS achieves its intended outcome(s)/results;
- Engaging, directing and supporting persons to contribute to the effectiveness of the BMS
- Ensuring and promoting continual/continuous improvement;
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility;
- Developing, leading and promoting a culture in the Fine Tubes Ltd that supports the intended outcomes of the BMS;
- Protecting workers from reprisals when reporting incidents, hazards, risks and opportunities;
- Ensuring Fine Tubes Ltd establishes and implements a process(es) for consultation and participation of workers;
- Supporting the establishment and functioning of health and safety committees;
- Communication is a key aspect of the business management system, and this will be performed in a variety of ways to different stakeholders and interested parties (including the safety committee), whilst promoting continuous improvement to the BMS and culture.

Senior management show their commitment by ensuring the availability of necessary resources, performing Management Reviews and communicating of the BMS Policy and Objectives throughout Fine Tubes Ltd

The designated Quality Management Representative, as identified in Fine Tubes Ltd organisation structure, has the organisational freedom, and unrestricted access to top management to resolve quality management issues.

Fine Tubes Ltd is committed to the concept of continual BMS improvement through the constant refinement and improvement of the BMS and the progressive elimination of weaknesses.

Tools used to realise this aim are detailed, but not limited to:

- Control of Non-Conforming Product.
- Measurement of Customer Satisfaction.
- Internal Auditing.
- Corrective / Preventive Action.
- Management Review.
- Data Collection and Analysis.
- Risk Management tools.
- Interested Parties.
- Internal/External Issues.
- Resource requirements.

BMS Policy

Top management establish, implement and maintain the BMS Policy in order that it:

- Is appropriate to the purpose and context of the organisation and supports its strategic direction, including the nature, scale and impacts of its activities, products and services.
- Provides a framework for setting the BMS objectives;
- Includes a commitment to satisfy requirements including, but not limited to fulfilling legal & compliance requirements and other requirements, protection of the environment, including prevention of pollution, and other specific requirements relevant to the context of Fine Tubes Ltd.
- Includes a commitment to continual improvement of the BMS.
- Includes a commitment to provide safe and healthy working conditions for the prevention of work-related injury and ill health and is appropriate to the purpose, size and context of the organisation and to the specific nature of its OH&S risks and OH&S opportunities;
- Includes a commitment to eliminate hazards and reduce OH&S risks;
- Includes a commitment to consultation and participation of workers, and, where they exist, workers' representatives.

The BMS policy is:

- Located electronically within the document management system and displayed on company notice boards around the site.
- Communicated to all persons working for, or on behalf of, Fine Tubes Ltd.
- Is available to all interested parties on request.
- Is relevant and appropriate to the business requirements and in line with relevant standards.

Actions to address risks and opportunities

When planning for the BMS, Fine Tubes Ltd considers the issues related to context of the organisation, the requirements of interested parties and scope of the BMS to determine the risks and opportunities that need to be addressed to:

- Give assurance that the BMS can achieve its intended outcome(s);
- Enhance desirable effects;
- Prevent, or reduce, undesired effects;
- Achieve continual/ continuous improvement.

This is contained within the Business Risk register.

Risk and Opportunity Planning

When determining the risks and opportunities relating to the BMS, and its intended outcomes that need to be addressed, Fine Tubes Ltd takes into account:

- Hazards
- BMS Risks and Opportunities
- Legal and 'Other' requirements.
- Significant environmental aspects
- Preparation for and response to emergency situations.

- The hierarchy of controls and outputs from the BMS.

Fine Tubes Ltd maintains documented information on:

- Risks and opportunities;
- The process(es) and actions needed to determine and address its risks and opportunities to the extent necessary to have confidence that they are carried out as planned.

Fine Tubes Ltd reviews its activities, products, and services to ensure that they are controlled to prevent any significant or potentially significant effect on Quality of products & services, the environment and OHS risks.

The Legal Register, together with its significant aspects, has been utilised to set the EHS objectives of Fine Tubes Ltd.

When external contractors are employed, they will be issued with the appropriate parts of Fine Tubes Ltd BMS, and it will be incumbent upon them to fully comply with all aspects of this system. To ensure all contractors work safely, it is a requirement that all contractors send copies of their risk assessments and method statements prior to any work being undertaken to be reviewed by Fine Tubes Ltd management team.

A Risk Register exists which the Management Team use to minimise Fine Tubes Ltd current and future BMS risks and to establish a system of continuous improvement in our manufacturing activities with respect to our impact on the environment.

The Quality & Technical Director and EHS Manager, together with all other relevant Departmental Managers, will review the objectives and targets that have been established from the BMS Review and develop a programme for their effective and timely implementation. This programme should be reviewed in conjunction with the overall financial, operational and business requirements of the Company to ensure that:

- There are adequate resources to achieve them.
- The objectives are measurable.
- The relevant management responsibilities for their completion have been defined.
- The target dates that have been established are sensible for their implementation.

When planning its actions, Fine Tubes Ltd consider best practices, technological options and financial, operational and business requirements.

Hazard Identification

Fine Tubes Ltd has established, implemented and maintained a process(es) for hazard identification that is ongoing and proactive. The process(es) take into account, but not be limited to:

- How work is organised, social factors (including workload, work hours, victimization, harassment and bullying), leadership and the culture in the organisation;
- Routine and non-routine activities and situations, including hazards arising from:
 - Infrastructure, equipment, materials, substances and the physical conditions of the workplace;
 - Product and service design, research, development, testing, production, assembly, construction, service delivery, maintenance and disposal;

- Human factors;
- How the work is performed;
- Past relevant incidents, internal or external to the organisation, including emergencies, and their causes;
- Potential emergency situations;
- People, including consideration of:
 - Those with access to the workplace and their activities, including workers, contractors, visitors and other persons;
 - Those in the vicinity of the workplace who can be affected by the activities of the organisation;
 - Workers at a location not under the direct control of the organisation;
- Other issues, including consideration of:
 - The design of work areas, processes, installations, machinery/equipment, operating procedures and work organisation, including their adaptation to the needs and capabilities of the workers involved;
 - Situations occurring in the vicinity of the workplace caused by work-related activities under the control of the organisation;
 - Situations not controlled by the organisation and occurring in the vicinity of the workplace that can cause injury and ill health to persons in the workplace;
- Actual or proposed changes in organisation, operations, processes, activities and the BMS
- Changes in knowledge of, and information about, hazards.

Fine Tubes Ltd has established, implemented and maintained a process(es) to:

- Assess OH&S risks from the identified hazards, while taking into account the effectiveness of existing controls;
- Determine and assess the other risks related to the establishment, implementation, operation and maintenance of the OH&S management system.
- Change, including planned, or new developments, and or new or modified activities, products or services
- Abnormal conditions and the reasonably foreseeable emergency situations

Fine Tubes Ltd methodology(ies) and criteria for the assessment of OH&S risks shall be defined with respect to their scope, nature and timing to ensure they are proactive rather than reactive and are used in a systematic way. Documented information shall be maintained and retained on the methodology(ies) and criteria.

Determination of Legal and Other requirements

Fine Tubes Ltd has established, implemented and maintained a process(es) to:

- Determine and have access to up-to-date legal requirements and other requirements that are applicable to its hazards, OH&S risks and environmental aspects, as well as OH&S and environmental management system;
- Determine how these legal requirements and other requirements apply to the organisation and what needs to be communicated;

- Take these legal requirements and other requirements into account when establishing, implementing, maintaining and continually improving its OH&S and environmental management system.

Fine Tubes Ltd maintains and retains documented information on its legal requirements and other requirements and ensures that it is updated to reflect any changes.

BMS Objectives

Fine Tubes Ltd has established BMS objectives at relevant functions and levels in order to maintain and continually improve the BMS and the performance of the BMS.

The BMS objectives are:

- Consistent with the BMS policy;
- Measurable (if practicable) or capable of performance evaluation;
- Take into account:
 - Applicable requirements;
 - The results of the assessment of risks and opportunities;
 - The results of consultation with workers (see 5.4) and, where they exist, workers' representatives;
- Monitored;
- Communicated;
- Updated as appropriate.

Planning to Achieve BMS Objectives

When planning how to achieve the BMS objectives, Fine Tubes Ltd determines:

- What will be done;
- What resources will be required;
- Who will be responsible;
- When it will be completed;
- How the results will be evaluated, including indicators for monitoring;
- How the actions to achieve BMS objectives will be integrated into the organisation's business processes.

Fine Tubes Ltd maintains and retains documented information on the BMS objectives and plans to achieve them.

Top Management ensure the integrity of the BMS is maintained when changes to the BMS are planned and implemented.

Resources

Fine Tubes Ltd has determine and provided the resources needed for the establishment, implementation, maintenance and continual improvement of the BMS.

The Operations Director is responsible for ensuring that the requirements of all BMS documents are administered, monitored, maintained, and applied effectively throughout the organisation. The performance of the BMS will be reported by the Leadership team at the Management Review Meeting.

The Quality & Technical Director and EHS Manager are responsible for the administration of all BMS documents and the issue of all additions, revisions, and amendments.

Fine Tubes Ltd has an induction process which covers all aspects of the BMS

All employees must understand the potential effects of their activities on the health and safety and the possible consequential consequences that may arise from non-compliance with the EHS procedures.

Competence

Fine Tubes Ltd:

- Determines the necessary competence of person(s) doing work under its control that affects the performance and effectiveness of the BMS.
- Ensures that workers are competent (including the ability to identify hazards) on the basis of appropriate education, training or experience;
- Determines training needs associated with its environmental aspects and its environmental management system
- Where applicable, takes action to acquire and maintain the necessary competence, and evaluate the effectiveness of the actions taken;
- Retains appropriate documented information as evidence of competence.

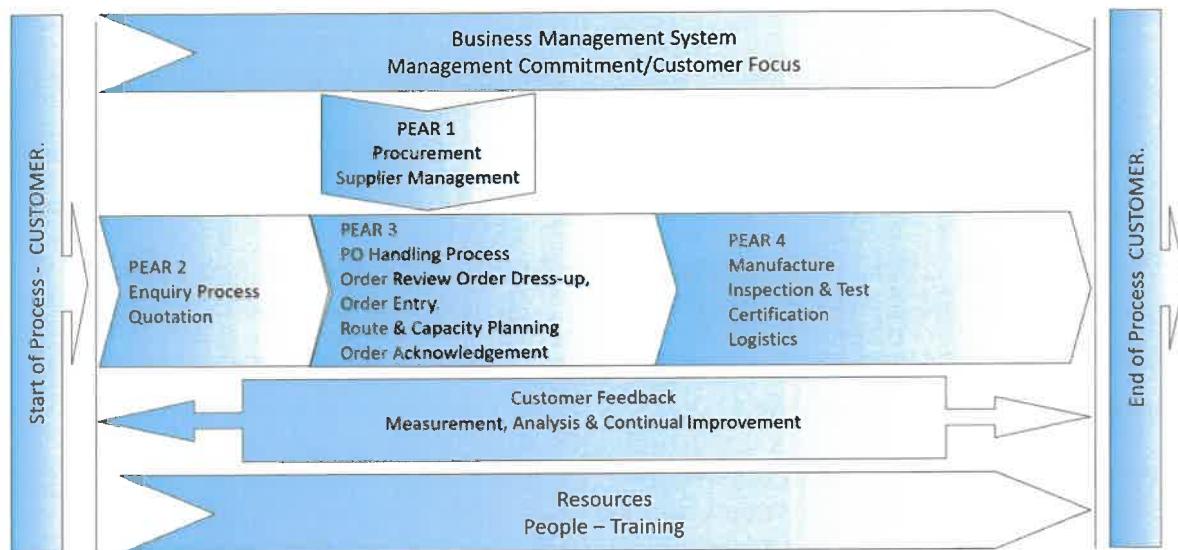
Awareness

Fine Tubes Ltd ensures that persons doing work under the organisations control are aware of:

- The BMS policy and objectives;
- Their contribution to the effectiveness of the BMS, including the benefits of improved BMS performance;
- The implications and potential consequences of not conforming to the BMS requirements;
- Relevant BMS documented information and changes thereto;
- The significant environmental aspects and work related actual or potential environmental impacts associated with their work
- Incidents and the outcomes of investigations that are relevant to them;
- Hazards, OH&S risks and actions determined that are relevant to them;
- The ability to remove themselves from work situations that they consider present an imminent and serious danger to their life or health, as well as the arrangements for protecting them from undue consequences for doing so.
- Their contribution to product or service conformity and product safety;
- The importance of ethical behaviour.

Fine Tubes Ltd has established effective communication paths to ensure robust implementation of the BMS, taking into consideration business risks, from an environmental, health and safety and quality perspective.

The set-up of Fine Tubes Ltd business structure is defined in the process flow map below –



Communication

Fine Tubes Ltd have established, implemented and maintained the process(es) needed for the internal and external communications relevant to the BMS including determining:

- on what it will communicate;
- when to communicate;
- with whom to communicate:
 - internally among the various levels and functions of the organisation;
 - among contractors and visitors to the workplace;
 - among other interested parties;
- How to communicate.
- Who communicates

Fine Tubes Ltd take into account diversity aspects (e.g. gender, language, culture, literacy, disability) when considering its communication needs.

Fine Tubes Ltd ensures that the views of external interested parties are considered in establishing its communication process(es).

When establishing its communication process(es), Fine Tubes Ltd also:

- Take into account its legal requirements and other requirements;
- Ensure that BMS information to be communicated is consistent with information generated within the BMS and is reliable.

Fine Tubes Ltd responds to relevant communications on its BMS and retains documented information, as appropriate.

Internal communication

Fine Tubes Ltd:

- Internally communicates information relevant to the BMS among the various levels and functions of the organisation, including changes to the BMS, as appropriate;
- ensures its communication process(es) enables workers to contribute to continual improvement.

External Communication

Fine Tubes Ltd externally communicates information relevant to the BMS, as established by the organisation's communication process(es) and taking into account its legal requirements and other requirements.

Communication with customers includes:

- Providing information relating to products and services;
- Handling enquiries, contracts, or orders, including changes;
- Obtaining customer feedback relating to products and services, including customer complaints;
- Handling or controlling customer property;
- Establishing specific requirements for contingency actions, when relevant.

Operation

Fine Tubes Ltd manufacture a range of sizes of precision cold drawn Stainless Steel Titanium and Nickel Alloy tubing. These are produced from standard hollows which may be either extruded or extruded and tube reduced or welded from strip. The raw material is supplied by external manufacturers. The processing includes the use of a range of oils, chemicals, and abrasive materials. These are employed in a series of standard metal deformation machines employing cold working practices. In addition, the material is heat treated in both air and inert atmosphere furnaces and may be chemically treated, as appropriate, in a series of acid baths.

Operational Planning and Control

Fine Tubes Ltd plan, implement, control and maintain the processes needed to meet requirements of the BMS, and to implement the actions determined by:

- Establishing criteria/requirements for the processes, products and services;
- Implementing control of the processes in accordance with the criteria;
- Maintaining and retaining documented information to the extent necessary to have confidence that the processes have been carried out as planned;
- Adapting work to workers.
- Identifying significant environmental effects and entering them onto the Register.
- Identifying significant OHS risks.
- Establishing measuring and analysis systems to assess the BMS impact. These will be maintained to ensure that levels are within the requirements of any legislation and regulations and meet any specific controls that are applied by the Company including National and International standards.
- Establishing that measuring, test, and inspection equipment is fully calibrated prior to use.
- Monthly Logging of Energy data onto a database. This data will be evaluated through the audit process to look for spikes in the energy usage.

- Monitoring and review of data required to be collected for government agencies.

Determining of requirements for products and services include consideration of:

- personal and product safety;
- producibility and inspectability;
- reliability, availability, and maintainability;
- suitability of parts and materials used in the product;
- selection and development of embedded software;
- product obsolescence;
- prevention, detection, and removal of foreign objects;
- handling, packaging, and preservation;
- recycling or final disposal of the product at the end of its life.

Operational Risk Management

Fine Tubes Ltd plans, implements, and controls a process for managing operational risks to the achievement of applicable requirements, which includes as appropriate to the organisation and the products and services:

- Assignment of responsibilities for operational risk management;
- Definition of risk assessment criteria (e.g., likelihood, consequences, risk acceptance);
- Identification, assessment, and communication of risks throughout operations;
- Identification, implementation, and management of actions to mitigate risks that exceed the defined risk acceptance criteria;
- Acceptance of risks remaining after implementation of mitigating actions.

Configuration Management

Fine Tubes Ltd plans, implements, and controls a process for configuration management as appropriate to the organisation and its products and services in order to ensure the identification and control of physical and functional attributes throughout the product lifecycle. This process:

- Controls product identity and traceability to requirements, including the implementation of identified changes;
- Ensures that the documented information (e.g., requirements, design, verification, validation and acceptance documentation) is consistent with the actual attributes of the products and services.

Product Safety

Fine Tubes Ltd plans, implements, and controls the processes needed to assure product safety during the entire product life cycle, as appropriate to the organisation and the product

Consistent with a life cycle, Fine Tubes Ltd has:

- Established controls, as appropriate, to ensure that its environmental requirements are addressed in the design and development process for the product or service, considering each life cycle stage
- Determined its environmental requirements for the procurement of all products and services, as appropriate

- Communicated its relative environmental requirements to external providers, including contractors
- Considered the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end of life treatment and final disposal of its products and services.

Prevention of counterfeit parts

Fine Tubes Ltd plans, implement, and controls processes, appropriate to the organisation and the product, for the prevention of counterfeit or suspect counterfeit part use and their inclusion in product(s) delivered to the customer.

Fine Tubes Ltd has established, implemented and maintained processes for the elimination of hazards and reduction of OH&S risks using the following hierarchy of controls:

- Eliminate the hazard;
- Substitute with less hazardous processes, operations, materials or equipment;
- Use engineering controls and reorganisation of work;
- Use administrative controls, including training;
- Use adequate personal protective equipment.

Management of Change

Fine Tubes Ltd has established processes for the implementation and control of planned temporary and permanent changes that impact BMS and performance, including:

New products, services and processes, or changes to existing products, services and processes, including:

- Workplace locations and surroundings;
- Work organisation;
- Working conditions;
- Equipment;
- Work force;

Changes to legal requirements and other requirements;

Changes in knowledge or information about hazards and OH&S risks;

Developments in knowledge and technology.

Fine Tubes Ltd reviews the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

Procurement

Fine Tubes Ltd has established, implemented and maintained processes to control the procurement of products and services in order to ensure their conformity to its BMS

Fine Tubes Ltd coordinates its procurement process(es) with its contractors, in order to identify hazards and to assess and control the OH&S risks arising from:

- The contractors' activities and operations that impact the organisation;

- The organisation's activities and operations that impact the contractors' workers;
- The contractors' activities and operations that impact other interested parties in the workplace.

Fine Tubes Ltd ensures that the requirements of its BMS are met by contractors and their workers. The organisation's procurement process(es) define and apply occupational health and safety criteria for the selection of contractors.

Fine Tubes Ltd ensures that outsourced functions and processes are controlled. The organisation ensures that its outsourcing arrangements are consistent with legal requirements and other requirements and with achieving the intended outcomes of the BMS. The type and degree of control to be applied to these functions and processes shall be defined within the BMS.

Emergency Preparedness and Response

Fine Tubes Ltd has establish, implemented and maintained process(es) needed to prepare for and respond to potential emergency situations, including:

- Establishing a planned response to emergency situations, including the provision of first aid and adverse environmental impacts;
- Providing training for the planned response;
- Periodically testing and exercising the planned response capability;
- Evaluating performance and, as necessary, revising the planned response, including after testing and, in particular, after the occurrence of emergency situations;
- Communicating and providing relevant information to all workers on their duties and responsibilities;
- Communicating relevant information to contractors, visitors, emergency response services, government authorities and, as appropriate, the local community;
- Taking into account the needs and capabilities of all relevant interested parties and ensuring their involvement, as appropriate, in the development of the planned response.

Fine Tubes Ltd maintains and retains documented information on the process(es) and on the plans for responding to potential emergency situations.

Fine Tubes Ltd have developed procedures and instructions to ensure that control of all operations is effective within Fine Tubes Ltd and are set-up to minimise risk to employees, contractors, and visitors, as well as not pollute the environment in the form of land, air, or water courses.

Risk assessments have been carried out for all operations at Fine Tubes Ltd. This assesses the risk and review the control measures in place to ensure the risk is controlled. The hierarchy of controls is used to minimise the risk and eliminate where possible.

Determining the Requirements for Products and Services

When determining the requirements for the products and services to be offered to customers, Fine Tubes Ltd ensures that:

- The requirements for the products and services are defined, including:
 - Any applicable statutory and regulatory requirements;
 - Those considered necessary by Fine Tubes Ltd;
- The organisation can meet the claims for the products and services it offers;

- Special requirements of the products and services are determined;
- Operational risks (e.g., new technology, ability and capacity to provide, short delivery time frame) have been identified.

Review of the Requirements for Products and Services

Fine Tubes Ltd ensures that it has the ability to meet the requirements for products and services to be offered to customers. The organisation conducts a review before committing to supply products and services to the customer, which includes:

- Requirements specified by the customer, including the requirements for delivery and post-delivery activities;
- Requirements not stated by the customer, but necessary for the specified or intended use, when known;
- Requirements specified by the organisation;
- Statutory and regulatory requirements applicable to the products and services;
- Contract or order requirements differing from those previously expressed.

This review shall be coordinated with applicable functions of the organisation.

The customer requirements are confirmed by Fine Tubes Ltd before acceptance, when the customer does not provide a documented statement of their requirements.

Fine Tubes Ltd retains documented information, as applicable:

- On the results of the review;
- On any new requirements for the products and services.

Fine Tubes Ltd ensures that relevant documented information is amended, and that relevant persons are made aware of the changed requirements, when the requirements for products and services are changed.

Design and Development of Products and Services

Fine Tubes Ltd does not design or develop products. Design and development of products, and services, is therefore excluded from the BMS.

Monitoring, Measurement, Analysis and Performance evaluation

Fine Tubes Ltd establishes, implements and maintains process(es) for monitoring, measurement, analysis and performance evaluation.

Fine Tubes Ltd determines:

- What needs to be monitored and measured, including:
 - The extent to which legal requirements and other requirements are fulfilled;
 - Its activities and operations related to identified hazards, risks and opportunities;
 - Progress towards achievement of the organisation's OH&S and environmental objectives;
 - Effectiveness of operational and other controls;
- The methods for monitoring, measurement, analysis and performance evaluation, as applicable, to ensure valid results;
- The criteria against which Fine Tubes Ltd evaluates its BMS performance;

- When the monitoring and measuring shall be performed;
- When the results from monitoring and measurement shall be analysed, evaluated and communicated.
- Maintain knowledge and understanding of its compliance status with legal requirements and other requirements.

Fine Tubes Ltd evaluates the BMS performance and then determines the effectiveness of the BMS.

Customer Satisfaction

Fine Tubes Ltd monitors customers' perception of the degree to which their needs and expectations have been fulfilled. The methods for obtaining, monitoring, and reviewing this information have been determined.

Examples of monitoring and evaluating customer satisfaction are product and service conformity, on-time delivery, customer complaints and corrective action results.

Analysis and Evaluation

Fine Tubes Ltd analyses and evaluates appropriate data and information arising from monitoring and measurement.

Results of analysis are used to evaluate:

- Conformity of products and services;
- The degree of customer satisfaction;
- The performance and effectiveness of the quality management system;
- If planning has been implemented effectively;
- The effectiveness of actions taken to address risks and opportunities;
- The performance of external providers;
- The need for improvements to the BMS.
- Compliance with legal and other requirements.

Internal Audits

Fine Tubes Ltd conducts internal audits at planned intervals to provide information on whether the BMS:

- Conforms to:
 - The organisation's own requirements for its BMS, including the BMS policy and BMS objectives;
 - The requirements of this document and appropriate international standards;
- Is effectively implemented and maintained.

Fine Tubes Ltd:

- Plans, establishes, implements and maintains an audit programme(s) including the frequency, methods, responsibilities, consultation, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;
- Define the audit criteria and scope for each audit;
- Select auditors and conduct audits to ensure objectivity and the impartiality of the audit process;

- Ensure that the results of the audits are reported to relevant managers; ensure that relevant audit results are reported to workers, and, where they exist, workers' representatives, and other relevant interested parties;
- Takes appropriate correction and corrective action to address nonconformities and continually improve its BMS, without undue delay;
- Retains documented information as evidence of the implementation of the audit programme and the audit results.

Management Review

Top management reviews Fine Tubes Ltd BMS, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness.

The management review shall include consideration of:

- The status of actions from previous management reviews;
- Changes in external and internal issues that are relevant to the BMS, including:
 - The needs and expectations of interested parties;
 - Legal requirements and other requirements;
 - Risks and opportunities;
- The extent to which the BMS policy and the BMS objectives have been met;
- Information on the BMS performance, including trends in:
 - Incidents, nonconformities, corrective actions and continual improvement;
 - Monitoring and measurement results;
 - Results of evaluation of compliance with legal requirements and other requirements;
 - Audit results;
 - Consultation and participation of workers;
 - Risks and opportunities;
- Adequacy of resources for maintaining an effective BMS;
- Relevant communication(s) with interested parties;
- The performance of external providers;
- On time delivery performance;
- Opportunities for continual improvement.

The outputs of the management review shall include decisions related to:

- The continuing suitability, adequacy and effectiveness of the BMS in achieving its intended outcomes;
- Continual improvement opportunities;
- Any need for changes to the BMS;
- Resources needed;
- Risks identified and actions, if needed;
- Any implications for the strategic direction of the organisation.

Top management communicate the relevant outputs of management reviews to workers, and, where they exist, workers' representatives.

Fine Tubes Ltd retains documented information as evidence of the results of management reviews.

Continual Improvement

Fine Tubes Ltd shall continually improve the suitability, adequacy, and effectiveness of the BMS to enhance business performance.

Fine Tubes Ltd determines opportunities for improvement and implements necessary actions to achieve the intended outcomes of its BMS, meet customer requirements and enhance customer satisfaction.

These include, but are not limited to -

- Enhancing and improving the performance and effectiveness of the BMS;
- Improving products and services to meet requirements as well as to address future needs and expectations;
- Promoting a culture that supports the BMS;
- Promoting the participation of workers in implementing actions for the continual improvement of the BMS;
- Communicating the relevant results of continual improvement to workers, and, where they exist, workers' representatives;
- Correcting, preventing or reducing undesired effects;
- Maintaining and retaining documented information as evidence of continual improvement.

All improvements will be monitored for a set period prior to confirmation to ensure they are suitable and adequate and in keeping with the requirements of the business. All newly implemented improvements will be reviewed at the next available Management Review meeting. All improvements will be recorded in a relevant action plan that was linked to the improvement.

Incident, non-Conformity and Corrective Action

Fine Tubes Ltd has established, implemented and maintains a process(es), including reporting, investigating and taking action, to determine and manage incidents and nonconformities. When an incident or a nonconformity occurs, Fine Tubes Ltd shall:

- React in a timely manner to the incident or nonconformity and, as applicable:
 - Take action to control and correct it;
 - Deal with the consequences;
- Evaluate, with the participation of workers and the involvement of other relevant interested parties, the need for corrective action to eliminate the root cause(s) of the incident or nonconformity, in order that it does not recur or occur elsewhere, by:
 - Investigating the incident or reviewing the nonconformity;
 - Determining the cause(s) of the incident or nonconformity;
 - Determining if similar incidents have occurred, if nonconformities exist, or if they could potentially occur;
- Review existing assessments of risks, as appropriate;
- Determine and implement any action needed, including corrective action, in accordance with the hierarchy of controls and the management of change;
- Assess risks that relate to new or changed hazards, prior to taking action;
- Review the effectiveness of any action taken, including corrective action;
- Make changes to the BMS, if necessary.

Corrective actions shall be appropriate to the effects or potential effects of the incidents or nonconformities encountered.

Fine Tubes Ltd retains documented information as evidence of:

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

The organisation shall communicate this documented information to relevant workers, and, where they exist, workers' representatives, and other relevant interested parties.

Non-compliance shall be recorded, and the immediate Corrective Actions carried out and authorised by the approved personnel. Further Corrective Action to prevent a re-occurrence shall be undertaken in a structured fashion at a level corresponding to the risks encountered and shall involve an investigation into the root causes of the non-compliance, and corrective action plan with agreed responsibilities and target dates. These Corrective Actions shall be evaluated to ensure they are carried out and are effective.

A system has been established to review all complaints from external parties to assess their validity within the EHS and Quality standards of Fine Tubes Ltd. If necessary, an appropriate corrective action procedure will then be established, and necessary communication maintained with the interested party that has raised the complaint.

The Suppliers of all purchased materials and services that are relevant to the BMS shall be assessed as to their ability to meet the Company requirements, shall be monitored to ascertain their conformance to the requirements and where necessary appropriate Corrective Action shall be taken. Suppliers who meet the requirements shall be listed on the Approved Suppliers List. The purchase of materials and supplies shall be controlled, and so that under normal circumstances only approved suppliers shall be used.

Amendments

Changes from previous revision 01 of BMS001

- Added reference, within the 'Understanding the needs and expectations of workers and other interested parties' section (page 8), to customers and AHJ's (authorities having jurisdiction) having access to the Fine Tubes site.
- Added reference, within the 'Leadership' section (page 12), relating to promoting and understanding a healthy 'safety culture'
- Added reference, within the 'Leadership' section (page 13), relating to promoting, identifying, collecting, reviewing and implementing the 'use of experience' at Fine Tubes.