



Environment Policy

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Change History: Issue 8	
Page 8 Section 4	Turbine Surface Technologies HSE Organisation Structure – “Head of HS&E & Operations” changed to “Head of QA and HSE”
Page 10 Section 6.1	“Head of HS&E & Operations” changed to “Head of QA and HS&E”
Page 11 Section 8.1	“Head of HSE & Operations” changed to “Head of QA and HS&E” and “HS&E” taken out.
Page 11	Section 8.2 added details of “Safety Codes of Practice”
Page 12	Section 8.4 – “Head of HS&E & Operations” changed to “Head of QA and HS&E”
Page 14	Added “Appendix 1 10. Safety Codes of Practice at TSTL”

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1. Introduction

There are compelling human, financial and quality reasons for giving correct attention to Environmental matters.

Environmental damage can have high human and financial costs. It often causes unnecessary misery, threaten livelihoods, loss of profit and tarnish a company's reputation.

I am personally committed to achieving the best levels of performance in Environmental control. I want you all to share this commitment and help develop the best possible Environmental culture throughout Turbine Surface Technologies Ltd.

This key part of professional management inevitably involves time, effort and sometimes money, but the human and business gains outweigh the costs. Each area will need effective health, safety and environmental management systems to prevent failures.

High standards of performance are expected in everything we do. Shareholders want ethical companies to invest in and employees want to work for a company that is concerned about the environment. No one wants the guilt of causing an environmental incident by an act of omission. Customers want to deal with companies who are committed to continuous improvement in environmental performance. Our commitment to the best environmental practices will be judged in future years by our ability to sustain high performance.

This document describes the policy, organisation and arrangements which must be implemented throughout Turbine Surface Technologies Ltd. Each of you must personally ensure that it is being applied in your part of the organisation.

Ben Kirby

**General Manager
Turbine Surface Technologies Limited**

2. Environment Policy Statement

Turbine Surface Technologies limited (TSTL) is a 50/50 jointly owned limited company between Rolls-Royce plc and Chromalloy Gas Turbine LLC coating gas turbine components for Rolls-Royce.

TSTL recognises that environmental issues are of fundamental importance to a successful and responsible business strategy, both for the Company and its customers.

TSTL will maintain an Environmental Management System (EMS) that meets the requirements of ISO 14001:2015 the scope of which is the coating of hot end gas turbine components.

TSTL will further ensure in its own operations, that:

- TSTL will attract and retain a workforce that are proud to be part of the company and encourage environmentally responsible behaviours
- Identify opportunities across the current manufacturing process, new technology and capital investments to reduce resource consumption of materials, energy and water normalised per output
- Contractors will be selected that behave in an environmentally responsible manner to help TSTL achieve the outcomes of the EMS
- TSTL will operate in a manner that prevents or avoids pollution
- Meet the environmental requirements of our major shareholders and customers
- Promote the achievements of the Environmental Management System
- Comply with relevant environmental legislation and other identified obligations
- Manage risks and opportunities to continually improve the EMS and improve the resilience of the business (Business Continuity)

The Policy statement will be reviewed periodically, it may be amended or be supplemented, as appropriate by further statements relating to the work of particular departments or groups of employees. TSTL will ensure its employees are made aware of this policy.

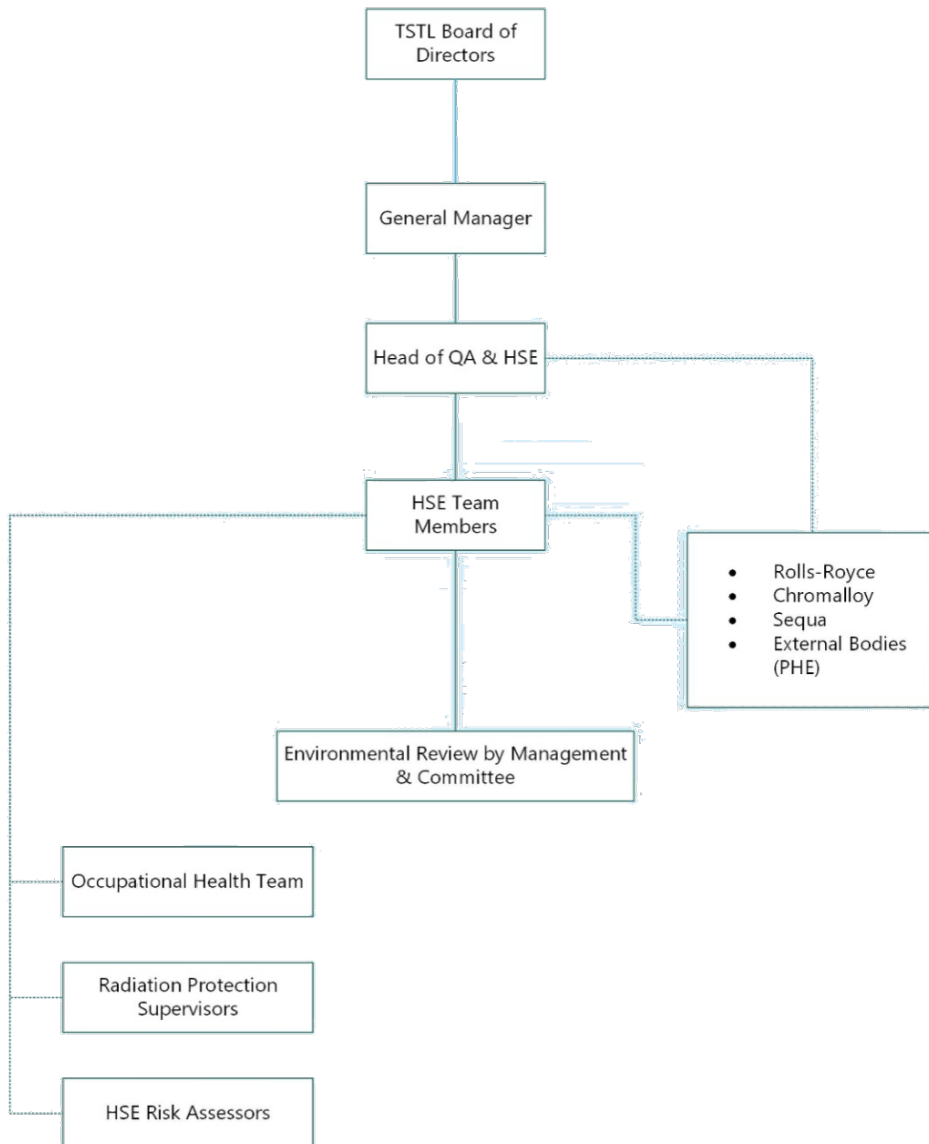
Ben Kirby
General Manager

3. TSTL Environment Strategic Objectives

TSTL's overall objective is to comply with the Environmental Policy, to comply we have the following objectives:

1. To maintain an Environmental Management System (EMS) that meets the requirements of ISO 14001:2015
2. TSTL will protect and retain a workforce that are proud to be part of the company and encourage environmentally responsible behaviours
3. Identify opportunities across the manufacturing process and tier 1 suppliers to reduce resource consumption of materials, energy and water normalised per output
4. Contractors will be selected that behave in an environmentally responsible manner to help TSTL achieve the outcomes of the EMS
5. TSTL will operate in a manner that prevents or avoids pollution
6. Meet the environmental requirements of our major shareholders and customers
7. Promote the achievements of the Environmental Management System
8. Comply with relevant environmental legislation and other identified obligations
9. Manage risks and opportunities to continually improve the EMS and improve the resilience of the business (Business Continuity)
10. Review the policy and change where necessary

4. Turbine Surface Technologies HSE Organisation Structure



Key: PHE = Public Health England

5. Environment Responsibilities

5.1 General Manger

The overall accountability for the Environment is vested in the General Manager. The General Manager shall in conjunction with the TSTL Board ensure that appropriate mechanisms are in place to enable the company to fulfil its environmental responsibilities. They shall provide positive leadership and visible commitment to the company's standards and environmental management systems.

5.2 Management and Supervision

All managers and supervisors are responsible for ensuring that their areas don't cause adverse environmental impact. They must be aware of the specific legal requirements which apply to their area, the company policy in respect of those regulations and what they must do to meet the relevant standards. They must ensure that, where applicable to their area:

- a) Regular tours of all areas will be undertaken to pro-actively identify environmental unsafe situations as a means to prevent further incidents. These shall be formally recorded and closed out
- b) All necessary environmental training has been carried out
- c) All audit findings pertaining to your area have been closed out
- d) Any important environmental issues are re-enforced in departmental meeting agendas or "tool box talks"
- e) A good example is set to employees and contractors when visiting the company's work places and sites, by following environmental procedures
- f) Consultation is held with employee representatives and committees
- g) Relevant records are held and kept up-to-date
- h) Any environmental incidents are reported and as appropriate investigated to determine root cause and expedite any corrective action

5.3 All Employees

All persons employed by TSTL have a duty to themselves, their colleagues, the community and the environment to work in an environmentally responsible manner. To that end, all employees must:

- a) To take action to prevent work related environmental incidents
- b) Report environmental incidents and near misses immediately
- c) Suggest areas for improvement to managers, supervisors and charge hands
- d) Follow all training as regards the environment
- e) Co-operate with all environmental instructions and procedures

6. Turbine Surface Technologies Environmental Supporting Specialists

Employers are required to appoint competent persons to assist them in undertaking the measures necessary to comply with the requirements and prohibitions imposed by legislation. In addition, the fulfilment of certain environmental objectives and standards requires the allocation of particular responsibilities to competent individuals.

6.1 Head of QA and HS&E

Main responsibilities are:

- a) To develop company Environmental policies, arrangements, standards and develop implementation plans.
- b) Improve environmental awareness
- c) Provide specialist environmental advice and guidance
- d) Investigate significant environmental incidents
- e) Liaise with corporate and external environmental specialists
- f) Liaise with environmental enforcement authorities

6.2 HSE Team

Main responsibilities are:

- a) To assist in the development of company environmental policies
- b) To provide specialist environmental advice
- c) Investigate all environmental incidents
- d) Carry out audits and inspections to monitor compliance
- e) Liaise with corporate and other external environmental specialists
- f) Liaise with environmental enforcement authorities
- g) Co-ordinate environmental training in conjunction with human resources

6.3 Individuals and Special Responsibilities

In addition to the full time HS&E team a number of individuals undertake particular tasks as part of their everyday duties.

Those involved shall have received appropriate, approved training before being appointed to the task and shall be given the time and resources to carry out their duties effectively.

- a) Internal Environment Auditors

Conduct ISO 14001 internal audits to help comply with the standard

7. Environmental Support

7.1 External Non – Turbine Surface Technologies HSE Professionals

Specialist help is available from the parent company HSE departments. These specialists can support TSTL in discharging its environmental responsibilities.

7.2 Facilities and Services Management at TSTL

The bulk of facilities and services management will be provided internally by the TSTL facilities and maintenance department. However, some services (e.g. emissions testing, ppm on extraction equipment and LEV testing) will be undertaken by external approved contractors.

8. Management of the Environment at TSTL

8.1 TSTL Board of Directors

The TSTL board of directors is the determining body for the Environmental Policy and Practice at TSTL. They shall ensure that the Company complies with the Environmental Policy by having effective procedures supported by adequate resources, training, information and competent advisor. Advice on Policy matters may be sought from the parent company HSE Departments, as well as the TSTL Head of QA and HS&E, Head of Operations and Facilities.

TSTL via the board of directors and senior managers shall set the environmental objectives and monitor environmental performance periodically (e.g. by inspection and audit).

The TSTL board shall provide positive leadership and visible commitment to the company's Environmental Policy and Practice.

8.2 Management, Supervision and Company Environmental Standards

There are certain company standards that help govern the control of the environment. These Standards are:

Safety Codes of Practice (SCOPs) – These provide guidance on the way to comply with some of the environmental legislation which pertains to TSTL. At the date of issue, the SCOPs shown in Appendix 1 are the ones that have environmental content.

Management and supervision must ensure that they together with employees in their departments are familiar with the provisions in the pertinent SCOPs.

8.3 External Audits

For the purposes of policing our ISO 14001 compliance, TSTL has regular audits by LRQA, the awarding body.

8.4 Monthly Environmental Management Meetings

This is chaired by the Head of QA & HS&E. This forms an important part of the governance of the environment to ensure that TSTL's Environmental strategic objectives are met.

8.5 Environment Representation

All employees will be involved in the promotion and achievement of the highest standards of environmental practice via their manager, supervisors and charge hands.

9. Arrangements for Elimination, Reducing or Controlling Risk

9.1 Environmental Audit

9.1.1 Internal Audit

As a requirement of ISO 14001:2015 internal audits of the Environmental Management System must be carried out and corrective action taken.

9.1.2 External Audit

Regular external audits are required by our external awarding company LRQA to check compliance with the standard.

9.1.3 Other External Audits

At unspecified intervals external auditing by the corporate HSE departments of Chromalloy, Rolls-Royce or Sequa can take place.

9.2 Environmental Training

All new employees and temporary staff shall receive training in accordance with the TSTL induction checklist. The Head of QA and HS&E, will approve as appropriate all HSE training.

9.3 Information on the Environment

Employees shall be provided with comprehensive and relevant information to enable them to undertake their duties with proper regard to the environmental requirements.

Such information shall include preventative and protective measures and include persons with special responsibilities.

Briefings on HSE which includes environmental issues shall be a part of the normal communication with all employees.

9.4 Emergency Arrangements

Arrangements are in place in case of spillage and certain persons have the ability to be able to activate the Draintector on the outlet to the pond by mobile phone if there is a risk to the environment outside of TSTL.

9.5 Approved Environmentally Responsible Contractors and Suppliers

In order that environmentally responsible contractors are chosen to do work at TSTL there is a selection procedure which potential contractors have to go through using Contractor Approval Form PPF010. There is also a Supplier Chain Code of Conduct which suppliers must sign.

Contractors and their personnel must obey all Environmental rules when working for TSTL

All contractors shall be issued **SCOP 22 – the Company HSE Regulations for Contractors booklet**. A trained TSTL Supervising Officer shall be identified to liaise with the Contractor and ensure safe environmental practices are adhered to.

All contractors must attend a site safety induction before undertaking any work on site.

9.6 Disposal of Waste and Chemicals

All departments have training on how to dispose of items in their particular area.

9.7 Visitors

If visitors have not had an induction they must be escorted at all times by a TSTL staff member and it is the responsibility of the person who has invited him to make sure that this happens.

10. Safety Codes of Practice at TSTL

Appendix 1

At the date of issue of this Policy Document, for environmental control purposes the following SCOPs that are available. Further SCOPs may be issued as required.

Document Reference	Title
SCOP 22	Company Health, Safety and Environmental Regulations for Contractors