DEFINED PROCESS

SMS-001 Safety Management System

Change Record

1. All documented changes shall be recorded below
2. All revision changes shall be identified in Red throughout the main body of the document

Revision	Change Summary	Date
1	Initial Issue	12/11/2024

Table of Contents

Change Record 2
Table of Contents 3
Reference Documents 4
Darchem Engineering Ltd - Safety Policy 5
Definitions 6
1.1 Risk Management Definitions 6
2.0 Scope and Background 7
2.1 Scope 7
2.2 Background: Occupational Health and Safety v Product Safety System 7
3.0 Purpose / Design of the Safety Management System 7
4.0 SMS Policy, Objectives and Safety Vision 8
5.0 SMS Management Commitment, Accountability and Responsibility 9
6.0 SMS Promotion and Culture 11
7.0 Just Culture 12
8.0 Product Hazard Identification 13
9.0 Product Safety Reporting 13
10.0 Product Safety Risk Management 14
11.0 Performance Measurement and Improvement 15
12.0 Management of Change 17
13.0 Emergency Response 17
14.0 System Audit 17
15.0 Control of Records 18

Reference Documents

Document Number	Title
CAP 795	Safety Management Systems (SMS) Guidance for Organisations
SMM - 002	Darchem Engineering Health and Safety Manual
ICAO 9859	International Civil Aviation Organisation (ICAO) Safety Management Manual
DEL/CAA/001	Part 145 Maintenance Organisation Exposition
DEL/CAA/002	Part 21G Subpart G Production Organisation Exposition
QPM-001	Quality Policy Manual
DP - 2	Product Introduction and Change Control
DP - 3	Design and Development
DP – 4	Production
DP – 8	BMS Planning and Process Effectiveness
DP – 10	Non-conformities and Customer Feedback
BOP 4.03	Control of Records
BOP 6.01	Identification of Training Needs
BOP 7.01	Configuration Management
BOP 8.01	Internal Audits
BOP 8.02	Non-conformance Control and Corrective Actions
SMP - 001	Risk Assessment Procedure
SMP - 002	Accident, Incident & Near Miss Reporting and Investigation
SMP – 024	Fault Reporting
SMP – 046	Management of Change Procedure
HR – 08	Whistleblowers Policy

Darchem Engineering Ltd - Safety Policy

To prevent accidents and incidents our organisation will maintain an active Management System. We support the open sharing of information on all safety issues and encourage all employees to report any errors, safety hazards or concerns. We pledge that no staff member will be asked to compromise our safety standards to "get the job done".

Safety is a corporate value of this company and commit to comply with all applicable legislation, to meet all the applicable requirements, and adopt practices to improve safety standards.

We will provide the necessary resources for the implementation of the of the Safety policy. We believe in

providing our employees with a safe environment and customers with safe products and will apply the human factors principles including due consideration to the aspects of fatigue

Our overall safety objective is the proactive management of identifiable hazards and their associated risks with the intent to eliminate their potential for affecting product safety, and for injury to people and damage to equipment or the environment. To that end, we will continuously examine our operation for these hazards and find ways to minimise them. We will encourage hazards and incident reporting, train staff on safety management, document our findings and mitigation actions and strive for continuous improvement.

Ultimate responsibility for safety in the Company rests with me as the Operating President and Accountable Manager of Darchem Engineering. Responsibility for making our operations safer for everyone lies with each one of us. Each manager is responsible for implementing the Safety Management System (SMS) in his or her area of responsibility and will be held accountable to ensure that all reasonable steps are taken.

We set objectives for organizational safety culture and safety performance these are: -

- Zero accidents and harm to any person and the environment.
- To always ensure Regulatory Compliance; and
- To ensure continuous improvement through regular reviews and enhancement of our safety systems and Performance.
- To ensure our people are competent for the work they undertake.
- To ensure where a task is considered novel, complex or high risk that a suitable level of independent oversight exists.
- To achieve a "Just" and healthy safety culture.

Signed:

Dated: 12th Nov 2024

Alan Dunbar

Operating Unit President

Definitions

1.1 Risk Management Definitions

1.1.1 **Hazard**. A hazard is an act or an omission, an object or a condition that may lead to harm. Each hazard has its own potential degree of harm and its own likelihood of manifestation. Hazards may be evident, or they may lie dormant within a system only to become apparent when interacted with in a particular manner.

1.1.2 **Risk.** Risk is an assessment of a hazard's potential to cause harm defined by the severity of the consequence(s) and the likelihood of occurrence.

1.1.3 **Harm**. In the context of safety risk management harm is defined as the loss of, or damage to property and equipment, or injury to, or death of persons.

1.1.4 **Risk Treatment**. Risk treatment is a process designed to modify risks, thereby reducing the potential for harm and may also be referred to as risk mitigation.

1.1.5 **As Low As Reasonably Practicable (ALARP)**. Risk treatment aims to achieve a level of risk that is 'As Low As is Reasonably Practicable' or ALARP. ALARP, an ICAO safety management concept, accepts that risk treatment can be constrained by the resources and costs involved and by technical feasibility of the treatment plan. A balance must be struck between the cost and feasibility of a treatment strategy and its potential benefits and once this balance has been reached the risk may be considered to meet ALARP.

1.1.6 **Risk Tolerability**. In the risk treatment process, DEL. seeks to modify the risk to a level that is 'tolerable' to the organisation. The Operating Unit President is ultimately responsible for determining whether a risk is tolerable and will subsequently direct the timeframe for review.

1.1.7 **Hazardous Event**. Is an occurrence that may result in harm to personnel or equipment.

1.1.8 **Residual Risk**. It is vital to understand that the risk management process seldom eliminates risk entirely and that when the process is complete some or all the risk may remain. Residual Risk is the level of risk remaining after completion of the risk management process.

1.1.9 **Acceptable/Unacceptable Risk**. The evaluation of whether a risk is acceptable or unacceptable to the organisation is made by reference to the Risk Criteria defined in the Risk Matrix.

2.0 Scope and Background

2.1 Scope

2.1.1 The SMS described in this document is applicable to all personnel engaged in all the business activities of Darchem Engineering. All personnel are to receive, as a minimum, SMS overview training.

2.1.2 DEL is accredited by BSI as meeting the requirements of ISO14001, ISO 45001, ISO 50001, AS/EN 9100 and ISO9001 management system standards and within the CAA Part 145 and Part 21G regulations. The SMS forms an integral part of our integrated Business Management System (BMS).

2.2 Background: Occupational Health and Safety v Product Safety System

2.2.1 **People (Health and Safety Management).** DEL maintains a Health and Safety Management System that is accredited to ISO 45001- Occupational Health & Safety Management system. DEL takes Health and Safety seriously and will provide safe working conditions, a safe environment, safe systems of work, with adequate information and training to protect the safety of staff, visitors and others who come to the sites.

2.2.2 **Product (Safety Management System).** The Safety Management System (SMS) focuses on the product safety and aims to design safety into the product and process throughout the product lifecycle.

Definition of a product is *"A physical product or delivered service created as a result of a process"*.

2.2.3 **Interaction.** The Health and Safety management System and Product Safety Management System, although operating independently, share information, reports (externally and internally generated), meeting agenda items etc.

3.0 Purpose / Design of the Safety Management System

3.1. The SMS is a systematic and comprehensive process for the effective management of safety, security and environmental risks. It is entirely inclusive and integrates the management of business operations (corporate leadership, commercial, finance, HR) with design, manufacturing and supporting functions to identify hazards, manage risks and develop a reporting and learning safety culture.

3.2. The SMS has been designed to conform to International Civil Aviation Organisation (ICAO), and UK Civil Aviation Authority (CAA) guidance on SMS and has been 'tailored' to meet the specific safety challenges of DEL.

The DEL SMS consists of the following elements

- Hazard Identification and Risk Management
- Safety Assurance
- Safety Promotion and Training
- A Safety Policy

3.3. The safety of DEL's products starts at initial concept of any project at which point hazards are identified which are then feed into Design Team to "design out" as many hazards as practicable or provide effective mitigation. Only then can the Production Engineering and Operations manufacture a "safe" product. Everyone in the process has the responsibility to raise any concerns or hazards to ensure they are addressed.

3.4. The SMS model can be summarised within Figure 1 below

FIGURE 1 - Darchem Engineering Ltd SMS Model

4.0 SMS Policy, Objectives and Safety Vision

4.1. **The DEL Safety Policy (refer to Page 5).** The DEL Safety Policy defines management commitment towards the SMS and being accountable for the balance between production and protection (navigating the safety space), along with the appointment of key personnel to ensure adequate resources are available to manage the SMS.

4.2. The policy is reviewed annually as part of the Business Management System Review (DP-8 BMS Planning and Process Effectiveness refers) and to ensure that the SMS is relevant, and any updates are communicated to managers and employees.

4.3. **SMS Objectives.** The SMS objectives are developed and set annually by the Senior Management Team (SLT) as part of the annual BMS review, communicated to, and endorsed by the Executive Management Team. A record of the agreed SMS objectives is detailed at Page 5 of this document.

4.4. SMS objectives shall be Specific, Measurable, Agreed to, Relevant and Time based (SMART).

4.5. SMS specific objectives are deployed throughout the business and incorporated into Accountable Managers annual objectives.

4.6. The organisation's performance against the SMS objectives is reported to the DEL Safety Committee Meeting.

4.7. **DEL Safety Vision.** DEL has a reputation as a capable and competent organisation such that: -

- Our customers feel safe and confident when using any product supplied
- Our employees take pride in knowing that is safe for operation
- All levels of the workforce value human life and health above all else and act accordingly to maintain the safety of our workplaces, products and services.
- Everyone can describe the part they play in safety management.

- Our Safety Management System is an integral part of our day-to-day operations and enables successful navigation of 'The Safety Space'.
- Have a culture where unjustified risk-taking behaviour is not tolerated at any level.
- Everyone can describe our Just Culture, and our Just Culture will positively shape our choices and behaviour.

5.0 SMS Management Commitment, Accountability and Responsibility

5.1 Ultimate Responsibility and Accountability. Ultimate responsibility and accountability for the SMS in the Company rests with the DEL Accountable Manager / President with authority delegated to the Nominate Post Holders

5.2 Accountability of the SMS processes and performance rests with the Accountable Manager and by devolved accountabilities with the Nominated Post Holders, members of the Senior Management Team (SMT), Managers and all DEL Personnel.

5.3 Each manager is responsible for implementing the Safety Management System in his or her area of responsibility and will be held accountable to ensure that all reasonable steps are taken so that it is understood and complied with.

5.4 The Compliance Manager and Engineering Manager are responsible for the delivery of SMS, Just Culture / Fair® System and Human Factors Awareness training in accordance with the SMS. Each manager is responsible for ensuring attendance and updating the Training Matrix for their specific area of responsibility.

5.5 The delivery and recording of the above training is subject to audit by the Compliance Auditor.

5.6 Responsibility for making our product safer for everyone lies with each one of us.

5.7 The VP of Operations and VP of Engineering are Senior Managers accountable for maintainingproduct safety standards required by regulation, having corporate authority for ensuring that all operations and maintenance system activities can be financed and carried out to the standard required. They are required to possess:

- Appropriate seniority in the organisation.
- Adequate input into the determination of operating budgets.
- Autonomy in financing operations to the required standards.
- Appropriate knowledge and understanding of the documents that prescribe safety standards.
- Appropriate knowledge and understanding of the requirements for competence of management personnel.
- Appropriate knowledge and understanding of the Business Management System (BMS), related principles and practices, and their role in the BMS.
- Appropriate knowledge and understanding of Product SMS, related principles and practices, and the role in such systems.

The DEL Accountable Manager / President has ultimate responsibility for the establishment, maintenance and continuous improvement of the SMS.

They are responsible for the provision of adequate resources (personnel, time and finances) to establish and maintain the necessary capabilities, follow product safety procedures and balance the needs of production and protection.

5.8 **Nominated Post Holders/Responsible Process Owners/Managers.** In addition to the Accountable Manager the CAA requires that suitably qualified and experienced Nominated Post Holders / Responsible Process Owners / Managers assume responsibility for specific areas of the organisation. Each Nominated Post Holders / Responsible Process Owners / Manager (such as the Quality and Compliance Manager or Health and Safety (H&S) Manager for example) has responsibility for compliance with the regulatory requirements relating to SMS management within their assigned area of the organisation specifically and the whole of DEL in general. Each Post Holder / Responsible Process Owner / Manager shall have the safety, quality and compliance of DEL operations within that assigned area as a key objective and performance measure within their position description.

5.9 **DEL Senior Management Team (SMT).** The DEL SMT is composed of the Operating Unit President, Vice Presidents and Senior Managers of the organisation. Each member of the DEL SMT is responsible for quality and compliance with the requirements of their respective areas of responsibility. DEL SMT meetings shall include the safety performance of the organisation as an agenda item. The DEL SMT has an obligation to promote the Product Safety Objectives and Policy and to demonstrate commitment to meeting them.

5.10 **Responsibility and Authority of DEL Employees**. Every employee is required to comply with the requirements of the DEL SMS and Policy. Employees will receive Safety (including Human Factors) Awareness training and will be required to embrace and enable a Just Culture and report safety incidents or concerns in a timely manner. Training records are held by HR and on Departmental Training Matrices. Each manager is responsible for ensuring attendance and updating the Training Matrix for their specific Area of Responsibility. The delivery and recording of the above training are subject to audit by the Compliance Auditor.

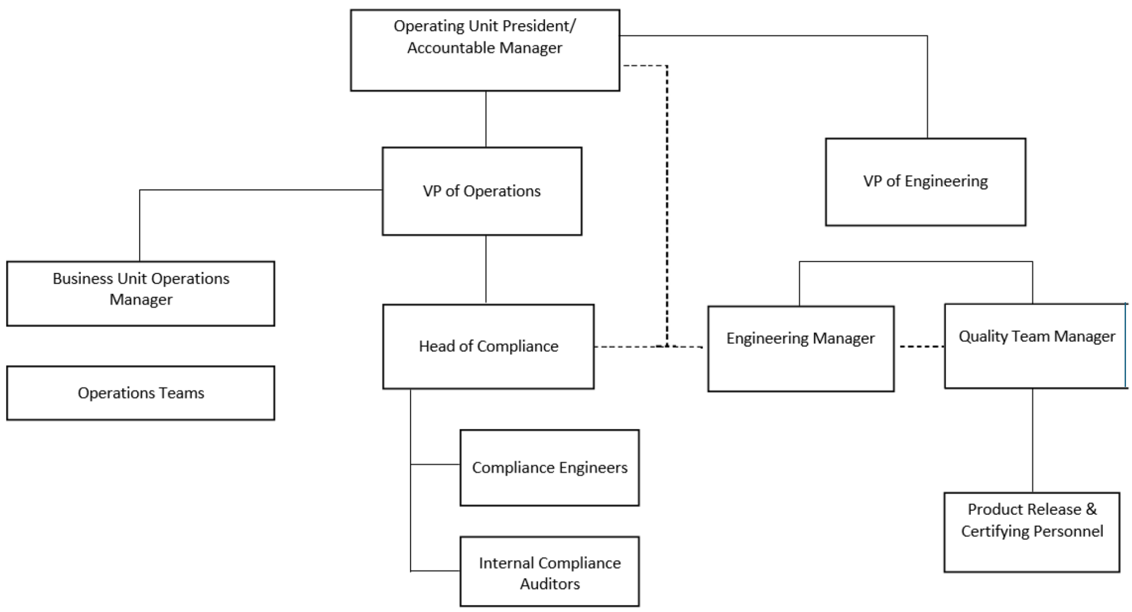
5.11 **Responsibility and Independence.** Figure 2 is the SMS organisational chart for DEL and shows the lines of responsibility and independence within DEL. The diagram shows that the Head of Compliance and Engineering Manager have clear lines of communication to the President for when the Vice President of Engineering is either unavailable or they may be a conflict of interest between production and protection.

5.12 The Engineering Manager is responsible for the analysis of hazardous information and/or reported data to trend and to measure the safety performance of DEL.

5.13 Feedback from customers/users is provided via Safety reporting from customers in the form of Safety Alerts, product non-conformance and warranty returns, Internal staff as they identify hazards through near miss reports or Ideas programme for Safety and product improvement, Accident and Incident investigations, H&S risk assessments and Change Management process actions /mitigations.

5.15 **Third Parties**. Third party contractors, key suppliers, goods and service providers are accountable to DEL for the quality of their product and for the consideration of product safety and risk during the design, manufacture and delivery. DEL will ensure that all 3rd party contractors not only meet the required standards but also continue to maintain those standards as detailed in the QPM – 001 Quality Policy Manual to achieve this, all such third parties will be liable to audit and measurement of their performance by DEL.

Figure 2 – DARCHEM Engineering SMS Organisation



6.0 SMS Promotion and Culture

6.1 DEL is committed to the training and education of all staff across the organisation such that they become comfortable and conversant with the Safety Management System (SMS), its requirements and benefits. DEL is also committed to active and effective communication and engagement with all staff throughout the organisation and has established a suite of regular engagements in different forms with all staff.

6.2 **Training and Education.** The key objectives of the Safety training and education are -

- To ensure staff across the organisation have an appropriate awareness and working knowledge of the SMS and all its elements.
- To ensure staff are aware of the organisation's expectations and requirements of them regarding the SMS, but also more broadly regarding their responsibilities and accountability for product safety performance and outcome.
- To create a strong awareness and familiarity across the organisation with the objectives of the SMS.
- To encourage and enable a "Just Culture", encourage open reporting and SMS participation to build a positive safety culture.
- To attain feedback that can be used to identify area for improvement.

6.3 The product safety training and education programme will be developed and maintained on a regular basis to ensure personnel are trained and competent to perform their SMS duties appropriate to everyone's involvement in the SMS.

6.4 **New Staff.** SMS training shall be provided for all new staff, which will be commensurate with their level of employment, as described in the above sections.

6.5 **All Staff**. This training is designed to educate all personnel on what constitutes a SMS and to ensure they are aware of their obligations as determined by regulation and company policy.

6.6 **Recurrent Training Courses.** Training will be refreshed at a periodicity of not more than two years at their appropriate level. The refresher training will detail any changes in the SMS since their last training session and should include relevant and new material to engage participants.

6.7 **Human Factors.** Foundation Level Human Factors Awareness training is delivered to all staff (induction and every 2-years thereafter). This training allows staff to understand that human beings are fallible, typical behaviours and techniques for spotting concerns in staff and themselves. The training also focuses on actual incidents that have occurred though time and Error Management techniques/processes to enable DEL to become a 'learning organisation'. By determining through analysis and trending of both internal and external incidents the Root Cause(s) then the Human Factor element of any future incident should be reduced due to increased awareness and learning.

6.8 **Training Requirements/Records**. SMS/Human Factors Awareness training/refresher requirements are to be detailed on Departmental Training Matrices. The Engineering Manager in co-ordination with CAA Coordinator will define and notify personnel of set training sessions.

6.9 The CAA Coordinator will maintain records of persons who have completed the SMS and HF training. Responsible managers are required to provide names, ensure attendance and update the Department Training Matrices for their specific area of responsibility.

6.10 For each training session the following is recorded and kept:

- The training course documentation including the agenda and any slides or handouts (training presentations configuration controlled and stored on Q Pulse).
- Following each training session, a list of personnel who attended the training session is provided to HR dept for inclusion in personnel record.

6.11 The Compliance Auditor is responsible for auditing Attendance Sheets/Department Training Matrices for compliance.

6.12 **Promotion and culture:** Feedback and assessment are obtained on all training and education events to shape and drive continuous improvement of the training and education activities under the SMS. Feedback is documented following every training session via the use of a Feedback Form and stored by the CAA Co-ordinator.

6.13 The SMT biannual all hands meeting, safety Alerts, quarterly Company Newsletter, information screens, toolbox talks and posters are all used to promote the safety and just culture across the organisation.

7.0 Just Culture

7.1 Safety Promotion and Training is provided to help achieve a good reporting culture and to create / maintain a 'Just Culture' in the workplace. Learning from experience is a key element of this pillar and assists greatly in preventing recurrent incidents.

7.2 The SMS aims to facilitate an organisational culture that fosters an atmosphere of trust in which all personnel are motivated to share essential safety-related information but in which they are also clear about where the line is drawn between acceptable and unacceptable behaviour. The SMS also aims to support a fair and consistent response to employee behaviours, focusing on the choices and intentions of the individuals concerned rather than the consequences of their actions.

7.3 DEL operate a 'Just Culture' policy and conduct investigations and disciplinary actions against the requirements.

7.4 It is essential that DEL employees understand what a Just Culture is and actively participate in reporting safety concerns, hazards, near-misses, incidents and accidents, and are open and supportive to investigations, audits and other safety management activities.

8.0 Product Hazard Identification

8.1 Hazard Identification and Risk Management. Hazard identification and risk management is done proactively, in a structured manner, at the right time and with competent personnel, hazard identification and risk management contribute significantly towards safe systems of work and the delivery of product that meets safety targets. Identifying hazards proactively through change management processes is key, as is a proactive Human factors management.

8.2 Sources of safety data that feed into the hazard management process includes but is not limited

- New Product Introduction process from customer DFMEA and internal PFMEA
- Safety reporting from customers in the form of Safety Alerts, product non-conformance and warranty returns.
- Internal staff as they identify hazards through near miss reports or Ideas programme for Safety and product improvement.
- Accident and Incident investigations, H&S risk assessments
- Change Management process actions and mitigations

All DEL products have a commensurate approach towards the identification of Hazards based on the equipment complexity and associated Risk to Life.

The NPI team and Engineering Manager are responsible for assessing the hazards and recommend through review with the Design Authority (in DEL's case this is the customer) how to minimise or design out the hazard. Once the Product is deemed Safe for production the NPI team will work with operations to ensure robust mitigation actions are implemented to minimise the risk to product safety.

9.0 Product Safety Reporting

9.1 **Introduction**. All DEL. personnel are encouraged to report hazards and safety concerns at any stage of the product lifecycle. This extends to Health and Safety (H&S) and Environmental concerns, and we strive to achieve, in accordance with the Safety Policy, a 'Just' safety culture. This can be achieved, for example, by providing feedback to a report that has been received, consultation for clarification, investigation and then feedback to the individual that reported the observation/concern. All DEL customers are encouraged to report any problems, concerns and incidents with product/services provided in order that DEL can quickly rectify the problem, reduce risk, remain a 'learning organisation' and 'continuously improve'.

9.2 **DEL Internal Reporting Procedure**. All personnel are encouraged to report any safety related areas of concern this may include, but not limited to:

- Product Safety
- Quality
- Procedure
- Health and Safety.
- Environment
- Human factors

9.3 Reporting can be via the use of a Safety Report Form that are located at visible points around the Company. All employees are informed of their use and location when receiving SMS and Human Factors Awareness training. If a Safety Report Form cannot be easily located, then staff are encouraged to speak to their Line Manager or a member of the compliance team. Alternative methods of reporting can be used including use of Q-Pulse for reporting Non-conformance and Pisys ATMS for Near Miss and Accident reporting. All methods of reporting are reviewed when completing trend analysis.

9.4 Although DEL operates a 'Just' reporting culture employees also have the option to report anonymously. It is however preferable that anyone reporting identifies themselves on a report to allow any subsequent investigation to gather context and/or further evidence via informal interview. However, it is far better to report anonymously than not at all.

9.5 DEL's Reporting Procedure HR -08 Whistleblowers Policy also includes an option for confidential reporting, which ensures the safeguarding of the reporter's identity.

9.6 All reports will be investigated to determine the root cause and contributing factors to any errors and appropriate corrective action taken.

9.7 **External Reporting**. Darchem personnel are expected to comply with the reporting requirements of the Aviation Regulatory Authorities within whose jurisdictions they operate. Primarily these are UK CAA and the UK AAIB.

10.0 Product Safety Risk Management

10.1 **Introduction**. The DEL President / Accountable Manager is ultimately responsible for managing the Risk to Life (RtL) associated with the utilisation of DEL products /services. All identified risks require to be managed so that they both tolerable and As Low As Reasonably Practicable (ALARP). This should be communicated to the Design / Engineering Authority for the product in question. The entire system must be considered 'through-life'. This will require the combined approach of the Design Organisation (in DELs case the customer) and any other stakeholder responsible for delivering safe product Therefore, Hazard Identification will consider all through-life elements of the equipment such as the Concept, Assessment, Design, Manufacture, In-Service and Disposal (CADMID).

10.2 **Risk Management Process**. The DEL risk management process consists of seven steps: -

- STEP 1 – Establish the context
- STEP 2 – Hazard Identification
- STEP 3 – Risk Analysis
- STEP 4 – Risk Evaluation
- STEP 5 – Risk Treatment
- STEP 6 – Monitor and review
- STEP 7 – Communicate and consult

FIGURE 3 below, represents the 7-step process.

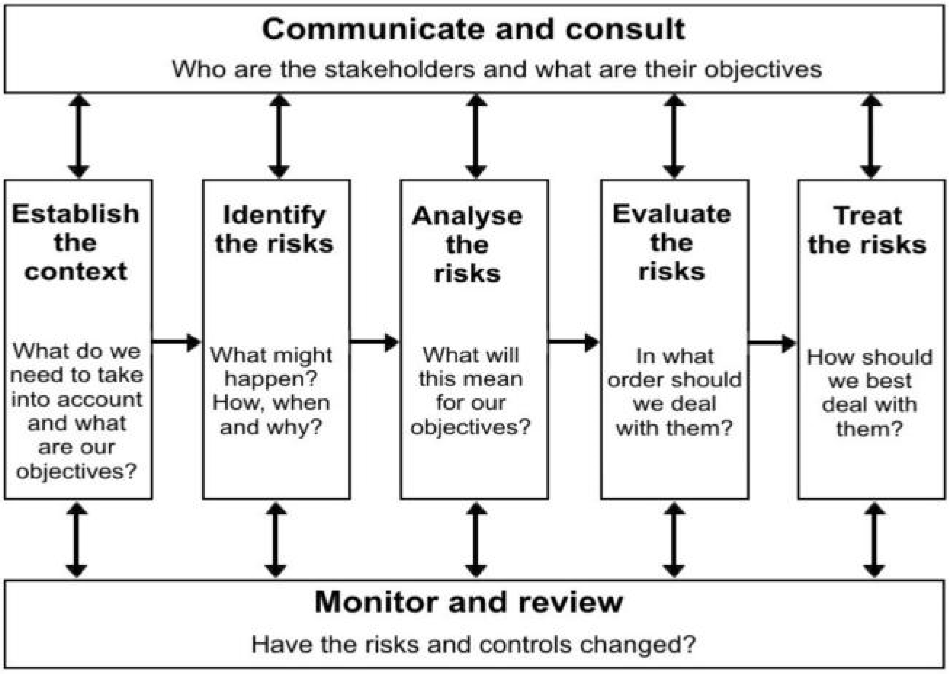


FIGURE 3 Risk Management Overview

10.3 **Failure Mode Effect Analysis (DFMEA / PFMEA).** Product risk is managed using FMEA to record identified hazards / failure modes associated risk and mitigation to minimise the risk. FMEA's are controlled by the Engineering / Design Department.

10.4 **Trend Analysis**. To identify changes over time in the management of hazards DEL will support the customer wherever possible in the identification and communication of trends. To achieve this DEL will consider the following (not exhaustive): -

- Customer complaints / warranty returns
- Internal product non-conformance
- Engineering Change requests.
- Change Management documentation
- Incident Investigations

10.4 The NPI team / Engineering Manager are responsible for communication of trends with the Design Authority (in DEL's case this is the customer) to minimise or design out the hazard.

10.5 Product risk process is managed through Defined Processes DP-2 Product introduction and Change Management and DP-3 Design and Development.

11.0 Performance Measurement and Improvement

11.1 The SMS consists of the comprehensive measurement and monitoring of a broad range of product safety performance indicators, the continuous improvement of the SMS system and the risk management of change includes processes to provide assurance that the SMS Objectives are being met or exceeded and that the SMS Policy is adequate and appropriate.

11.2 **Safety Reporting Data**. The Engineering Manager is responsible for co-ordinating the analysis of hazardous information and / or reported data to trend and to measure DEL's safety performance. This will include information from customer in service returns, internal hazard and incident investigations, internal product non-conformance etc.

11.3 **Safety Investigations**. Any Customer in-service incidents or accidents that involves DEL product will be investigated to determine the Root Cause(s) and contributing factors. Containment / corrective / preventative action should be carried out and then any mitigation to prevent reoccurrence should be 'future proofed' to minimise the likelihood of reoccurrence. It is essential to be forthcoming and transparent with any during/post investigation and, where possible to maintain a Just Culture and good reporting culture. To achieve this, only appropriately trained personnel will conduct investigations.

11.4 **Review of the Safety Management System and Policy.** The Head of Compliance is responsible for facilitating an annual strategic management review of the SMS including the Safety Policy, the Safety Objectives and the organisation's safety performance. The objectives of the annual review are to ensure continued compliance with regulatory and legislative requirements, continuous improvement of the SMS, and the achievement of continuous improvement in DEL's safety performance. (Note: This is done in conjunction with the (BMS) Management Review

11.5 **Safety Review Meeting.** Held monthly to discuss Health and Safety at Work (HASAW) issues. This meeting has been extended to include the subject of 'product safety' to ensure 'customer safety hazards' have been identified and are being managed.

The review meeting is chaired by the VP of Operations. Attendees include but not limited to

- Accountable Manager
- VP Operations (Chair)
- VP Engineering
- VP Finance
- VP Sales
- BU Manager
- Operations Managers
- H&S Manager
- Facilities
- Head of HR
- Head of Compliance

The purpose of the meeting is to

- Review safety performance against defined objectives and KPI's, audits and compliance monitoring
- Effectiveness of SMS
- Regulatory or governance changes which may have impact on the SMS
- Corrective or mitigating actions are addressed in timely manner

Minutes of the meeting and actions taken are recorded and distributed to the attendee

11.6 **Safety Auditing.** The Engineer Manager, Health and Safety Manager and Head of Compliance are responsible for ensuring the effectiveness of the SMS throughout the business is audited against a defined schedule of audits. The results of safety audits will be discussed at the relevant safety meeting and safety information will flow to the Accountable Manager / VP of Engineering and VP of Operations for awareness or action as appropriate. The results of both internal and external audits will provide insight into the effectiveness of the SMS.

11.7 **Safety Surveys**. Safety Surveys may be undertaken at the discretion of the Senior Management Team as a "Health Check of the BMS" Safety Surveys are distributed and results collated and analysed to measure safety awareness, safety system acceptance, safety behaviours and safety culture.

11.8 **Safety Performance Indicators (SPI's)**. SPIs are developed to record the performance of the above where applicable and form part of the monthly management reporting process.

12.0 Management of Change

12.1 Change has the potential to introduce new hazards and risks. Changes to procedures, structures, personnel movements, equipment or other elements of the system, require an appropriate Risk Assessment as a part of the evaluation process. Less measurable risk factors that may be associated with change, such as employee perception, morale and resistance to change also require consideration.

12.2 Change Management within DEL can be divided into two clear areas of consideration. These are the change management of DELS's internal business procedures and processes because of improvements, corrective action, organisational changes, regulatory or customer requirements and / or Modification actions to new / existing equipment or product / service

The various ways for managing change in DEL are documented within the BMS but include but not limited to

- DP – 2 Product Introduction and Change Control
- DP – 4 Production
- DP – 10 Nonconformities and Customer Feedback
- BOP 7.01 Configuration Management
- BOP 8.02 Non-conformance Control and Corrective Action
- SMP – 046 Management of Change Process

12.3 Major changes such as equipment moves, re-organisation, facility infrastructure projects within the Company are recorded in the change management module of Pisys software.

12.4 The Management of Change is audited on a regular basis (internally and externally) to determine compliance with internal procedures and external Regulatory requirements.

13.0 Emergency Response

13.1 DEL will take immediate action to support any customer and/or regulatory authority as comprehensively and professionally as possible when an emergency occurs. This may be the provision of accurate and timely information, replacement components/equipment or providing expertise as part of an investigation. All Emergency Response Plan (ERP) support requirements will be coordinated via the Engineering Manager and Head of Compliance.

14.0 System Audit

14.1 **Safety Management System (SMS) Audit**. The Safety Management System is subject to both internal audit in accordance with BOP 8.01 Internal Audits and external audit by regulatory authorities (CAA), 3rd Party accreditation bodies (BSI) and where applicable client organisations.

14.2 **Internal Audit Program.** The audits are programmed to ensure the continued effectiveness of all aspects of the SMS on an annual basis. At the discretion of the Head of Compliance the independent compliance audit function may add unscheduled audits into the program, eg when there are major changes to the SMS or as a result of audit findings / trend analysis indicating increased surveillance of the system is necessary. The dates designated within the audit program are flexible dependent upon work in progress.

Suitably qualified personnel who are independent of the functions being audited carry out the audits using specific audit checklists of the requirements appertaining to the function being audited. The checklists are intended as a basic guide, and do not limit the auditor to the topics listed.

14.3 **Internal Compliance Auditor Competency**. Competent personnel carry out both system and product/ process audits against a defined audit schedule or at the discretion of the Head of Compliance.

Training will normally consist of a recognised IRCA approved auditing course and then a recognised AS9100, UK CAA Part 21/Part 145 and SMS course followed by on-the-job training under the direction of an experienced audit team leader.

Human Resources (HR) will maintain training records.

14.4 **External Audit.** In addition to the internal safety program DEL have oversight audits of the SMS by external parties such as the CAA, BSI and client organisations.

14.5 The findings of all such audits are to be included in the agenda and discussed and actioned (if not already actioned during monthly SRM review meetings) at the Annual BMS Review meeting.

15.0 Control of Records

15.1 All records shall be controlled in accordance with BOP 4.03 Control of Records