



# **STARLIGHT ENGINEERING PTY. LTD.**

## **COMPANY PROFILE, CAPABILITIES AND RISK - QUALITY, ENVIRONMENT & SAFETY MANAGEMENT SYSTEM**

**-Manual Abstract-**

### **SLE M001**

This integrated Quality Environment and Safety (QES) Management System manual abstract describes in general what Starlight Engineering (SLE) does to manage manufacturing processes, product quality and business relationships in compliance with the following Australian Standards:

*AS/NZS ISO 9001:2016, 'Quality Management Systems – Requirements'*

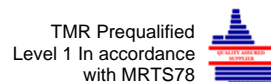
*AS/NZS ISO 14001:2015 'Environment Management System'*

*AS/NZS ISO 45001:2018 'Occupational Health and Safety Management System'*

*AS/NZS ISO 31000:2018 'Risk Management: Principles & Guidelines'*

It is mainly written in line with the layout and numbering methods used in AS/NZS ISO 9001:2016

Any changes to this document will require a Revision and the manual to be re-issued, authorised by SLE Managing Director





## Company Profile

**Starlight Engineering Pty. Ltd. (SLE)** is a privately-owned Queensland based company which has specialized in certified metal fabrication, project support services and welding since 1994.

SLE has successfully participated in a diverse range of construction projects throughout Australia to date which includes wharfs / bridges / ship loaders and general workshop fabrications. All work carried out is in accordance with the relevant Australian Standard, Industry Practices and Client's Specifications.

**Our Vision** is to become a sustainable company adding value to our customers' relationships.

**Our Values** are:

Philosophical	Organisational	Physical
Creativity Customer Delight Develop & Empower People Harmony Integrity Loyalty Resourcefulness Respect (A Will to ...) Succeed	Accountability Communications Teamwork Discipline Freedom for Initiatives Integration Standardisation Systemisation Community Engagement	Accuracy Housekeeping Maximum Resources Utilisation Quality of Products & Services Punctuality & Timeliness Reliability Responsiveness Safety Best Practices

**Our Goal** is to be a professional and efficient business providing value for money in our products/services in a safe manner achieving agreed prices and quality within customers' time frames.

## Serviced Industries

- |                                       |                                      |
|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> Marine       | <input type="checkbox"/> Transport   |
| <input type="checkbox"/> Construction | <input type="checkbox"/> Mining      |
| <input type="checkbox"/> Building     | <input type="checkbox"/> Earthmoving |



## Capabilities



### Services

- Workshop Facilities for General Fabrication & Welding
- Onsite Facilities for Project Support
- Skilled Labour & Equipment Hire
- International Welding Specialist - IWS (Internal)
- Welding Quality Documents (PQR, WPS etc.)
- Independent Weld Inspections/Testing  
 Destructive & Non- Destructive (X-Ray/UT/MPT)



### Technical Capabilities

- General Fabrication & Welding
- Welding Inspections
- SAW / FCAW / MIG / MMAW / TIG / Plasma
- 4m x 12mm Guillotine
- 4m x 16mm Rolling (ring for more details)
- 100T Punch & Shear
- Welders (Diesel & Electric 150-1000 amps)
- Wire Feeder Units (LN25/NA3/NA5/LT7)
- 4m Boom & Various Rotators
- Beveling Equipment
- Generators (5 - 150 KVA if no on-site power)
- Forklifts (2.5, 3, 12 & 23Tonne)
- 4x4 Site Trucks
- 2x4 Site Utilities
- Marine Workboats
- Outsource Blasting & Protective Coating Appliers





# Integrated Business & Operational Management System

## LEGISLATIVE FRAMEWORK

Work Health and Safety Act 2011 <ul style="list-style-type: none"><li>• Work Health and Safety Regulations</li><li>• Work Health &amp; Safety Code of Practices</li><li>• Work Health &amp; Safety Programs:<ul style="list-style-type: none"><li>○ PERforM – Participative Ergonomics for Manual Tasks</li><li>○ IPaM – Injury Prevention &amp; Management</li></ul></li></ul>
Environmental Protection Act 1994 (EP Act) <ul style="list-style-type: none"><li>• Environmental Regulations</li><li>• Environmental Protection Policies</li></ul>
Fair Work Act 2009 Fair Work (Building Industry) Act 2012 <ul style="list-style-type: none"><li>• The Code (superseded National Code of Practice for the Construction Industry)</li><li>• Fair Work Regulations</li><li>• National Employment Standards (NES)</li><li>• 2010 Manufacturing and Associated Industries and Occupations Award</li></ul>
Queensland Industrial Relations Act 1999
Queensland Code of Practice for the Building and Construction Industry <ul style="list-style-type: none"><li>• 2013 Implementation Guidelines to the Queensland Code of Practice for the Building and Construction Industry</li></ul>
Queensland Building and Construction Industry (Portable Long Service Leave) Act 1991
Queensland Workers Compensation and Rehabilitation Act 2003
Privacy Act 1988 including the Notifiable Data Breaches (NDB) scheme.
Gender Equality Act 2012
Racial Discrimination Act 1975
Sex Discrimination Act 1984
Disability Discrimination Act 1992
Competition and Consumer Act 2010
Modern Slavery Act 2018
Anti-Discrimination Act 1991

## AUSTRALIAN STANDARDS COMPLIANCE

Number	Title
ISO 9001:2015	Quality Management Systems – Requirements
ISO 9004:2000	Quality Management System, Guidelines for Performance Improvements
ISO 14001:2015	Environmental Management System
ISO 45001:2018	Occupational Health & Safety Management System
ISO 31000:2018	Risk Management: Principles & Guidelines
ISO 21500:2016	Project Management - Guidelines



# COMPANY POLICIES

## Quality Management System Policy

Starlight Engineering Pty Ltd provides services for the fabrication, welding, repair, installation and project support for metal structures and products. These core business activities are supported by project specialists within an integrated Quality Environment & Safety culture.

It is Starlight Engineering Pty Ltd policy that Quality Management principles and business optimisation philosophy are the basis on which our services and operations are being developed and delivered with customer focus and value-added framework.

Starlight Engineering Pty Ltd labour services are supported by flexible and responsible staff including a Certified International Welding Specialist. Our staff, contractors and suppliers are encouraged to be efficient, professional and actively participate within our Quality Management policy and initiatives. Training is continuously delivered in business ethics, technical skills, career development and Quality Environment & Safety management to ensure that our staff understand and embrace quality as an active philosophy when performing their duties.

Our Mission is to provide an excellent standard of service and high-quality products for our customers in accordance with our Business and Operational processes, Key Performance Indicators creating a continual improvement culture.

Our Goal is to be a professional, efficient and profitable business providing value for money in our products/services in a safe manner achieving agreed prices maintaining our profits margins by delivering quality within customers' time frames.

Planning activities are related to provide sustainability to our quality objectives:

- To ensure that we create and maintain a customer focus service.
- To promote quality awareness amongst all staff, so that they develop pride, satisfaction and responsibility of their work.
- To strive for improvement in our services to provide a satisfactory service to our clients, by encouraging innovation, and through the Quality Management System assessment, audit and review process.
- To achieve our business objectives, we have identified our Key Performance Indicators and established our core business processes using the AS/NZS 9004, Quality Management System - guidelines for performance improvements.

Doc: SLE P001 Rev.3  
Date: 25/06/2019

## Risk Management & Auditing Policy

Starlight Engineering Pty. Ltd. (SLE) is committed to managing risk in accordance with industry best practices and adherence to ISO 31000-2018 Risk Management – Principles and Guidelines.

SLE acknowledges, a risk management system is fundamental to achieving its strategic and operational objectives and serves as a methodology underpinning its system of governance.

The objectives of this policy are:

- Outline SLE approach to risk management
- Improve decision-making, accountability, and outcomes through the effective use of the chosen risk management methodology.
- Integrate risk management into SLE's daily operations; and

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- Acknowledge that considered risk taking using the risk management process is necessary and acceptable in the pursuit of SLE's goals and strategic objectives.

SLE's efforts for monitoring and auditing its risk management performance are part of a continuous improvement culture. These findings, opportunities and actions should be properly and timely reported and communicated across all levels of the organisation. SLE at all time shall support the need to control risks arising from its activities that may affect employees and other persons who are not employees.

Periodically audits are planned and executed to review the integrity and efficiency of SLE's risk management methodology, consultation protocols, and risks elimination or mitigation actions.

In summary, it is SLE's intend to:

- monitor and review:
  - the documented information integrity related to risk identification, assessments, consultation protocols, decisions monitoring and auditing reporting
  - the internal audit functions
  - the effectiveness and objectivity of the risk analysis; and
- act about the identified risks and hazards or when it is an opportunity for improvement.
- Promote transparency, accountability and ethical behaviour and culture.

To meet this commitment, risk management is to be every SLE employee's business. All employees are required to be responsible and accountable for managing risk in so far as is reasonably practicable within their area of responsibility.

Sound risk management principles and practices must become part of the normal management strategy for all SLE business processes and extended to its external environment including client's projects.

The management of risk is critical component of SLE's integrated Risk Quality Environment Safety Management System (R-QES IMS) and should also be part of existing and future business planning and operational requirements.

Doc No: SLE P002 Rev.4  
Date: 28/07/2020

## Work Health and Safety Management Policy

Starlight Engineering Pty. Ltd. (SLE) is entrusted to fulfil the requirements of the current Work Health and Safety legislation, Codes of Practice, and its regulations.

As part of this commitment Starlight Engineering has identified the following cornerstone elements of its sustainable development, fabrication, installation, and maintenance business, which will guide all staff and contractors in all aspects of our work and service delivery functions:

- To conduct our business activities pursuant to an integrated Risk Quality, Environmental and Workplace Health & Safety (R-QES) management system. It is the duty and obligation of every person employed by Starlight Engineering to identify hazards, if trained to perform Risk Assessments, and to report to the Officer in Charge (OIC) to ensure the success of this health and safety policy.
- Encourage and support SLE staff in the managing of hazards and risks using hierarchy of controls where the meaning of Personal Protective Equipment (PPE) is extended to Personal Protective environments (PPE)
- To adequately resource our commitment to continual improvement of our work health and safety policies, and organisational culture; SLE will develop its policies, procedures and performance indicators through consultation with all stakeholders, applying ISO 31000:2018 Risk Management principles, ISO 45001:2018 Occupational Health & Safety management system guidelines and best safety practices.
- It is the responsibility of all SLE staff and contractors to identify and evaluate hazards/risks with the objective to eliminate them or implement controls to minimise their impact to SLE's staff, stakeholders, and the environment. These control measurements should try to minimise/eliminate residual risks and/or making sure

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that is not creating new hazards. This will be achieved by encouraging cooperation between management and workers and through the provision of adequate instruction and training to all staff and contractors.

- To implement and maintain work health & safety practices, within all SLE's activities, pursuant to the current statutory and common law.
- Design and develop our operations in responsible ways to create and maintain a sustainable, safe and healthy work environment.

Starlight Engineering will deliver dynamic and relevant work practices to our internal and external customers, through these objectives:

- Business processes, safe work method statements and work instructions being undertaken having respect to risk reduction and promoting the safe regard of the public, employees, contractors, customers, environment, and company assets in a proficient manner.
- Our performance will be subjected to continual monitoring and review through toolbox meetings, internal & external audits, and management review meetings.
- To assess and control hazards to health and safety at the workplace to minimise associated injuries and illnesses and to implement documented rehabilitation and wellness programs.

Doc No: SLE P003 Rev.4  
Date: 29/07/2020

## Harassment, Discrimination & Workplace Bullying Policy

The purpose of this policy is to make Starlight Engineering employees aware of what constitutes discrimination, harassment and workplace bullying, and to create an environment where management and all employees assume responsibility for preventing and managing such incidents. This policy applies to all Starlight Engineering management, employees and contractors, and to all current and future Starlight Engineering business activities.

Workplace bullying is defined as repeated and unreasonable behaviour directed towards a worker or a group of workers that creates risk to health and safety.

Repeated behavior refers to the persistent nature of the behavior and can involve a range of behaviors over time

Unreasonable behavior means behavior that a reasonable person, having considered the circumstances, would see as unreasonable, including behavior that is victimizing, humiliating, intimidating or threatening.

Examples of behavior, whether intentional or unintentional, that may be considered bullying if they are repeated, unreasonable and create a risk to health and safety include but are not limited to:

- Abusive, insulting or offensive language or comments
- Unjustified criticism or complaints
- Deliberately excluding someone from workplace activities
- Withholding information that is vital for effective work performance
- Setting unreasonable timelines or constantly changing deadlines
- Setting tasks that are unreasonable below or beyond a person's skill level
- Denying access to information, supervision, consultation or resources to the detriment of the worker
- Spreading misinformation or malicious rumors
- Changing work arrangements such as rosters and leave to deliberately inconvenience a particular worker or workers

A single incident of unreasonable behavior is not considered to be workplace bullying; however, it may have the potential to escalate and should not be ignored.

If workplace bullying behaviour involves violence, for example physical assault or the threat of physical assault, it should be reported to the police.

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Starlight Engineering recognizes its responsibilities and obligations in employment under relevant anti-discrimination legislation. We will strive to achieve a healthy and safe workplace by addressing the issue of discrimination, harassment and workplace bullying.

Starlight Engineering is committed to educating employees as to the nature and effects of discrimination, harassment and workplace bullying, and to providing the necessary resources to inform them of the contents of this policy.

Employees of Starlight Engineering must not engage in discriminatory, harassing or bullying behaviour towards another employee, or a member of the public with whom they have contact in the course of their employment. Starlight Engineering does not tolerate such behaviour and may take disciplinary action up to and including dismissal against any employee who:

- Participates in discriminatory, harassing or bullying behaviour; or
- Victimises or retaliates against an employee who has lodged a complaint about discrimination, harassment or workplace bullying.

The objectives of this policy are:

- To develop and facilitate best practice hazard management procedures
- To reduce the incidence of workplace injuries and illnesses
- To assist with identifying, implementing and reviewing hazard management procedures

Doc No: SLE P004 Rev.3  
Date: 25/06/2019

## Injury Management and Rehabilitation Policy

Starlight Engineering's first corporate value is Safety and is resolutely committed to injury prevention programs in the workplace to achieve the Starlight Engineering ultimate goal of zero harm.

It is the aim of Starlight Engineering to minimise the impact of injury to its staff and other persons by providing the resources for a planned and systematic approach to the management and continuous improvement of the workers rehabilitation and compensation systems.

In the event of a workplace injury or illness Starlight Engineering is committed to ensuring that its employees are provided with timely and equitable claims management together with effective rehabilitation as well as return to work opportunities within their functional capacity. Starlight Engineering will also ensure that staff and employees have access to their legal entitlements for workers compensation.

This is achieved by:

- Providing employees with information and instruction on their rights and responsibilities regarding claims for workers' compensation, rehabilitation and return to work.
- Ensuring the process of workplace rehabilitation is commenced as soon as possible following an injury and in accordance with medical advice and relevant legislation.
- Ensuring employees are provided with access to appropriate medical treatment following a workplace injury and/or illness that incorporates early assessment and the involvement of rehabilitation specialists when required.
- Providing an injured employee with meaningful suitable duties where practicable as an integral part of the workplace rehabilitation process and ensuring that return to work is achieved as soon as possible by an injured employee.
- Consulting with employees and where applicable their nominated representative to ensure that the workplace rehabilitation program operates effectively, including regular consultation throughout the injury management process.
- Ensuring the employee will not be disadvantaged by participation in a workplace rehabilitation program.

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- Ensuring the security and confidentiality of records in relation to claims, rehabilitation and personal medical information obtained in order to manage workplace injury and/or rehabilitation.
- Establishing and maintaining legislative compliance for rehabilitation, as well as claims for all our operational sites, in all states and territories where applicable.
- Facilitating effective communication through the dissemination of relevant information to all employees.
- Maintaining a positive injury management culture through encouraging active participation in the early intervention and return to work process.

Doc No: SLE P005 Rev.3  
Date: 25/06/2019

## Smoking, Drugs and Alcohol Policy

This policy is intended to ensure that Starlight Engineering Pty. Ltd. (SLE) meets its responsibilities under the *Work Health & Safety Act 2011* and the *Queensland Tobacco and Other Smoking Products Act 1998* (including Amendment 2014) to provide a safe workplace and healthy wellbeing environment.

**Our aim** is to prevent smoking, drug and alcohol related incidents and foster safe and healthy behaviours at work.

**Our objective** is the prevention or elimination the potential for smoking, alcohol and drugs to contribute to work-related injuries and to ensure that the health and safety of people at SLE sites are not put at risk by the actions of smoking and/or people under the influence of drugs and alcohol.

This policy applies to all employees, contractors, visitors (including suppliers) entering onto SLE workplaces. The objectives of this policy will be achieved by:

- Prohibiting smoking and the unauthorised possession and consumption of alcohol and illegal drugs by any person from entering and/or while on SLE sites.
- Conducting pre-employment drug testing.
- Providing facilities and resources to enable employees, contractors and visitors to self-test for drug and alcohol.
- Conducting a random drug and alcohol testing regime at all SLE operated sites.
- Implementing a regular testing regime for employees who fail drug and alcohol tests.
- Mandatory drug and alcohol testing of any person driving or operating vehicles or equipment which is involved in an incident or dangerous event, as defined by the Work Health and Safety Act 2011, Regulations and Code of Practices.
- Testing of SLE employees, contractors, visitors where there is reasonable suspicion that they are affected by drugs or alcohol.
- Facilitating education, awareness and counselling programs for SLE employees and contractors.
- Requiring adherence to SLE's smoking, drug and alcohol policy in all contracts of service.
- Workplace safety and Health wellbeing are SLE's primary focus for implementing this smoking, drug and alcohol policy.
- It is a condition of access to SLE sites that all people must participate in drug and alcohol testing when required to do so.
- Smoking in SLE sites and/or a positive drug and alcohol test results will trigger a SLE disciplinary process.

The privacy and dignity of people being tested as part of the implementation of this policy will be protected. SLE respects the privacy of individuals and will maintain confidentiality of all personal information collected as detailed in SLE Privacy Policy SLE P010.

In the case of post-incident testing, the health and safety of the individual(s) involved will take precedence over any testing regime.

If required, drug screening tests will be undertaken using an oral swab with reference to AS4760 Procedures for the collection detection and quantification of drugs in oral fluid. Drug confirmation tests will be undertaken in an accredited laboratory in accordance with AS4760 Procedures for the collection detection and quantification of drugs in oral fluid.

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If required, alcohol tests will be undertaken using alcohol breath analysers in accordance with AS/NZS 3547:1997 Breath Alcohol testing devices for personal use.

Doc No: SLE P006 Rev.3  
Date: 25/06/2019

## Environmental Sustainability Management Policy

Starlight Engineering Pty. Ltd. is entrusted to fulfil the requirements of the current Environmental Sustainability legislation and its regulatory obligations.

The following principles underpin Starlight Engineering Environmental Sustainability Policy in undertaking our commitment towards environmentally sustainable sites:

- Understanding the environmental aspects and impacts of our activities
- Where appropriate changing the way that we operate.
- Ensuring that all staff and our contractors are aware of the expectations placed on them.
- Measuring our performance against agreed objectives and targets.
- The assessment, promotion and implementation of sustainable techniques and technology for the benefit of the customer and Starlight Engineering community environment.
- To promote the re-utilisation of recoverable non-renewable resources and to abide by the principles of Best Environmental Management Practice and Ecologically Sustainable Development
- To assess and control hazards to the environment on sites under our control to eliminate waste and protect their natural environment.

We will achieve this by:

- Engaging with suppliers to reduce waste and keeping in mind their products and services environmental impact.
- Developing environmentally sustainable and responsible sites that will foster sustainability values and principles to our staff and stakeholders.
- Training and supporting staff to work within this policy framework.
- Managing, monitoring and measuring resource use through implantation of best practice procedures.
- Design and develop our operations in responsible ways to create and maintain a sustainable, safe and healthy work environment

We acknowledge the current global challenges in terms of environment and natural resources, and we recognise our part in reducing our resource use, and ecological footprint by the most effective and efficient practices. Our key objective is to integrate environmental sustainable business practices into our operations.

Doc No: SLE P007 Rev.3  
Date: 25/06/2019

## Hazard Management Policy

The management of Starlight Engineering Pty. Ltd. (SLE) recognises the value of their employees, contractors and business associates, and the important role they play in providing the necessary resources that make a company successful.

The purpose of this policy is to integrate hazard reporting and risk management into all business activities and to create an environment where management and all employees/contractors assume responsibility for reporting hazards and eliminate and/or managing risks.

To meet this commitment, hazard management is to be every SLE employee and its contractors' business. All employees/contractors are required to be responsible and accountable for eliminating and/or managing risk in so far as it is reasonably practicable within their area of responsibility.

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The objectives of this policy are:

- To develop and facilitate best practice hazard management procedures
- To educate employees/contractors on the benefits in having a hazard free workplace
- To eliminate or at least minimise the incidence of workplace injuries and illnesses
- To assist with identifying, implementing and reviewing hazard methodology and SLE management procedures

Starlight Engineering Pty. Ltd. is committed to eliminate and/or manage hazard in compliance to the Work Health and Safety Act 2011, Regulations and Code Of Practices in accordance with industry best practices and AS/NZS ISO 31000 Risk Management – Principles and Guidelines.

Doc No: SLE P008 Rev.3  
Date: 25/06/2019

## Information Communications Technology Policy

Starlight Engineering (SLE) is committed to the management of risks associated with ICT Assets and Information Systems and the reduction of ICT security incidents. This policy provides the governance framework for Information management and security and defines SLE's policy in all aspects of Information Security as stipulated under the relevant Information standards.

SLE's purpose is to ensure that Information Security measures are in place, commensurate with their Information Asset classification, to protect Information Assets, Information and Communication Technology (ICT) Assets and Information Systems within SLE's ICT environment against unauthorised use or accidental modification, loss or release; and assist SLE to mitigate any damage or liability arising from the use of these Information Assets and Information Systems for purposes contrary to the SLE's policies and relevant Regulatory Compliance Instrument.

This policy scope applies to all SLE's employees, contractors and authorised third parties who have access to SLE's Information Assets and related Information Systems.

SLE devise, institute and enforce safe ICT system of work under a Risk Management framework underpinned in the following principles:

- Internal Governance
- External party governance
- Information Security and Cyber Security *is based on confidentiality, integrity, availability, compliant use and responsible use.*
- Policy, planning and governance
- Recordkeeping and Information Privacy *to comply with ISO/IEC 27001 and Regulatory Compliance Instruments, including but not limited to Information Privacy Act 2009 and Public Records Act 2002.*
- Information Asset management
- Human resources management
- Physical and environmental management
- Communications and operations management
- Access management and passwords
- System acquisition, development and maintenance
- Incident management
- Business continuity management
- Compliance management
- Penalties and discipline
- Disclaimers and non-disclosure agreements.
- Chains of Responsibility (CoR), Chain of Influence (CoI) and Chain of Evidence (CoE).

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The above principles intent to fulfill all relevant Australian Legislative Context and SLE's Risk Quality Environment and Safety Integrated Management System.

Doc No: SLE P009 Rev.4  
Date: 12/10/2020

## Privacy Policy

It is Starlight Engineering Pty. Ltd. (SLE) policy to fully comply with Privacy Act 1988 and relevant legislation as per the below Australian Privacy Principles (APPs):

- **APP1: Open and transparent management of information.** SLE manages individual(s) personal information with strictly confidence and this information is available only to Senior Managers. If other personnel require access to this information, they must seek and obtain SLE Managing Director authorization.
- **APP2: Anonymity and pseudonymity.** SLE will give to any individual(s) the opportunity to do business without the individual having to identify themselves. However, if this business(es) are related to money exchange and/or company information SLE will seek industry standard information as part of SLE Governance policies.
- **APP3: Collection of solicited personal information.** SLE collects personal information with the individual(s) consent.
- **APP4: Dealing with unsolicited personal information.** SLE according to the law will destroy the unsolicited information
- **APP5: Notification the collection of personal information.** SLE business processes and policies inform the reasons why individual(s) personal information is collected.
- **APP6: Use or disclosure of personal information.** SLE discloses in our business processes and documentations the reasons for the use of individual(s) personal information. SLE will not release individual(s) personal sensitive information such as health, racial or ethnic background, or criminal record and if required will seek professional and qualified advice.
- **APP7: Direct Marketing.** SLE does not use and/or apply any direct marketing activity.
- **APP8: Cross-border disclosure of personal information.** SLE does not require to transfer any individual(s) personal information outside Australia.
- **APP9: Adoption, use or disclosure of government related identifiers.** SLE will not use or adopt an Australian Government identifier for an individual as its own.
- **APP10: Quality of personal information.** SLE has implemented and maintains business processes to ensure individual(s) personal information is accurate and up to date. SLE review this information currency at least once per year.
- **APP11: Security of personal information.** SLE has implemented and maintains business processes to ensure individual(s) personal information is kept secure from unauthorised use or access. Starlight Engineering - when it is applicable and require - will comply with the Notifiable Data Breaches (NDB) scheme.
- **APP12: Access to personal information.** SLE recognizes the individual(s) right of access to their personal information anytime during SLE business hours.
- **APP13: Correction of personal information.** SLE recognizes the individual(s) the right to have that information corrected if it is inaccurate, incomplete or out of date.

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Date: 25/06/2019

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## Procurement Policy

Starlight Engineering Pty. Ltd. (SLE) is committed to working in partnership with our suppliers to realise the full value of our enterprises and to positively contribute to our communities, people and the environment.

This includes aiming to:

- Proactively engage with our suppliers with a focus on building trusting, co-operative and long-term relationships;
- Monitor the full compliance of Australian Laws in relation to supply chains such as the compliance to the Modern Slavery Act 2018 and their regulations.
- Apply good governance to provide oversight and means through which the objectives of the procurement process are monitored, audited and integrity is maintained.
- Define and apply appropriate sourcing methods in our procurement of goods and services, ensuring all capable suppliers have an equal access to opportunities to work with us;
- Deal with suppliers in good faith, ethically and responsibly, and make payments in accordance with agreed terms;
- When all other vetting requirements remain equal, give preference to suppliers that demonstrate a commitment to sustainably manage their business performance, with values complementary to our own;
- Employ appropriate methods for assessing the performance of our Preferred Suppliers and those engaged in higher risk activities and monitoring their progress over time; and
- Actively engage with our Preferred Suppliers and provide data and other relevant information to enable innovation and the development of products that meet our aspirations.

Key Performance Indicators (KPIs) relating to each of the above commitments within this Policy will be reported to meetings of Starlight Engineering Management Review Committee according to the AS/NZS ISO 9001:2016 Quality Management System – Requirements and our integrated Risk Quality Environment & Safety Management System. These KPIs will be reviewed periodically and through internal and external audits to ensure their continued relevance, as measures of suppliers' performance evolve and sustainability efforts mature.

For all written, verbal and digital communications with our suppliers, Starlight Engineering's Director and by delegation the Officers In Charge (OIC) are the only authorised officers to approve purchasing orders, variations and delivery or return of good and services. Director's delegations to SLE staff will be communicated in writing.

A nominated SLE staff/contractor who is responsible as part of their duties, or as agreed with the delegated authority, to perform the function of taking delivery of the goods and/or service will certify (sign and date) the Invoice and/or Delivery Docket that all of the goods were received in good order and condition or all of the service was performed satisfactorily. Payment will be approved based on this advice if the payment is against a duly approved purchase order.

Where goods and/or services were found to be faulty, improperly performed or not as specified the supplier must be immediately contacted and details noted on the invoice or order. If goods are returned to the supplier, details must be noted on the invoice and order and the supplier will not be paid for the returned goods.

Doc No: SLE P011 Rev.4  
Date: 18/06/2020

## Corporate Relationship Management Policy

Starlight Engineering Pty. Ltd. – SLE recognises the importance in forming partnerships and strategic alliances by capitalising in our capabilities, resources and business networks.

SLE's objective in establishing these partnerships and alliances is to produce satisfactory outcomes for our customers and partners.

SLE believes that a partnerships and/or strategic alliance is voluntarily agreed upon, built on the desire to have trust, and based on agreed-upon mutual benefits.

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To manage and integrate our partners/alliance activities we use our integrated Quality Environment & Safety Management System under the *AS/NZS ISO 9001 Quality Management System* framework which includes the application of *AS/NZS ISO 31000 Risk Management: Principles & Guidelines* across all the partnership and/or strategic alliance activities.

Doc No: SLE P012 Rev.3  
Date: 25/06/2019

## Community & Stakeholder Relations Policy

Starlight Engineering Pty. Ltd. - SLE is committed to apply and maintain an engaging community and stakeholder's relations by identifying their concerns and responding appropriately in a timely, cost-effective and mutually beneficial manner. These constructive approaches will assist us to create stronger, safer and healthier communities for our employees, their families and local residents.

SLE's Community and Stakeholder Relations Policy and Frameworks will continue to reflect our strong and ongoing commitment to collaboration, transparency and respect for all views. These policies recognise that SLE has a responsibility to engage stakeholders in a timely and appropriate manner, to report objectively on our activities and to provide regular updates about our operations and expansion plans. SLE is also committed to contributing to the economic and social development of the communities in which we have a presence and to conducting our activities in those communities in a safe and environmentally responsible manner.

SLE's integrated QES management system includes staff roles and responsibilities, provides mechanisms for training and development, and overall guidelines for the implementation of this policy.

Doc No: SLE P013 Rev.3  
Date: 25/06/2019

## Anti-Bribery & Corruption Policy

Starlight Engineering Pty Ltd says 'no' to all forms of bribery, does not condone bribery in any form, does not tolerate bribery and/or corruption. SLE's position on bribery is 'zero tolerance'.

At Starlight Engineering, we:

- conduct all business in an honest and ethical manner;
- are committed to acting professionally, fairly and with integrity in all business dealings and relationships;
- do not permit the making of any inappropriate promises, gifts or excessive hospitality to customers, suppliers and/or government officials in order to achieve unfair advantage or benefit; and
- resist any efforts made by others (including suppliers, customers or clients) to unfairly affect anyone and/or government official decision-making process in order to achieve unfair advantage or benefit.

Starlight Engineering's employees and Agents must:

- conduct all business in an honest and ethical manner.
- be committed to acting professionally, fairly and with integrity in all business dealings and relationships;
- not permit the making of any inappropriate promises, gifts or excessive hospitality to customers, suppliers and/or government officials in order to achieve unfair advantage or benefit; and
- resist any efforts made by others (including existing or potential suppliers, customers or clients) to unfairly affect any official decision-making process in order to achieve unfair advantage or benefit.

We encourage charitable donations/sponsorships only when they are ethical and legal under Australian laws and practices. We do not encourage contributions to political parties.

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We discourage, avoid, do not condone, do everything to resist facilitation payments as a means of doing business. We expect our business partners and Agents to implement and enforce effective systems to counter bribery.

We will always report and document any breach of the law that is brought to our attention through the reporting mechanism provided by Australian authorities.

Doc No: SLE P014 Rev.1  
Date: 25/06/2018

## Humanity Development Policy

Starlight Engineering Pty. Ltd. (SLE) is committed to supporting the common standard of rights and freedoms guaranteed by the Universal Declaration of Human Rights (UDHR).

The purpose of this policy is to ensure that SLE business practices, operations and organisational knowledge are guided by the basic principle that all individuals have a right to safe environments, health, respect, fair work compensation and development opportunities through education and equity.

As part of this commitment Starlight Engineering has identified this policy objectives and actions which are summarised in the following statements:

- SLE designs, implements, maintains, and monitors our staff, associates, and main suppliers' code of conduct in compliance to the relevant Australian legislation under the UDHR. All are requested to sign SLE's Conditions of Employment and an External Providers Conditions of Association.
- All staff, associates and main suppliers are encouraged to report any concerns of wrongdoing, including human rights violations such as Modern Slavery, Discrimination of any type, Child abuse, Family violence, etc. All reports are investigated, and appropriate action is taken.
- Due Diligence through SLE's Supply Chain and Staff Recruitment. SLE takes various initiatives to address risks and continuously assess the effectiveness of its policies, programs to ensure these risks continue to be eliminated or at least mitigated.
- SLE recognises that Physical and/or Mental Disabilities is part of our lives and/or might occur in our community, consequently our inclusive approach means "meeting the needs and priorities of people with disability, as they might be the most vulnerable and can suffer social exclusion and limited development opportunities".
- SLE promotes and encourages staff social and emotional wellbeing through workplace practices and policies such as a smoke/drug/alcohol free environment and provide access to information and resources about their effects including the current impact of COVID-19 pandemic.

Starlight Engineering will monitor and review the application of the above objectives and actions by:

- Including them in our Risk-Quality Environment & Safety integrated management system, documented information and keeping our organisational knowledge up to date with government guidelines, industry reports and SLE's risk assessments with the main goal of risks elimination or mitigation, and promoting the safe regard of the public, employees, contractors, customers, environment and company assets in an effective manner.
- SLE's performance will be subjected to continual monitoring and review through toolbox meetings, internal & external audits, and management coordination/review meetings.

Doc No: SLE P015 Rev.0  
Date: 21/07/2020

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# Digital Enterprise & Cyber Security Policy

This policy is applicable to all issues relate to the cyber, physical, and logical security of Starlight Engineering's (SLE) computer systems, Wi-Fi networks, mobile apps, and their environments by providing a platform to connect, collaborate, conduct business and maintain efficient communication channels in relation to:

- Digitalization of SLE's Business Operations.
- Resources Management.
- Staff Empowerment
- Customer Relationship Management

SLE is committed to developed itself as a digital enterprise by applying technology to improve and/or maintain its competitive advantages in its internal and external operations. SLE's business processes, operational methodologies and its products/services are supported by digitised documented information.

SLE understands that a digital organization demands an enterprise architecture that is guided by its organisational context and intended business outcomes which can provide factual and reliable information to its decision making process where SLE's business strategies are embracing a multidimensional approach as it is with its Risk, Quality Environment & Safety Integrated Management System (R-QES IMS) covering digitisation, data management, analytics, and automation.

SLE's cyber security efforts are focussed to:

- Complain with Australian Privacy and Data Management legislation.
- Identify the assets to be protected, including access to SLE's computers and/or devices
- Keep product/services delivery process traceability including their supply chain
- Identify and eliminate or minimise the threats to those assets and data
- Create rules and controls for protecting SLE's assets and business operations

This cyber-security policy provides clear guidelines to SLE's staff to understand their role in protecting SLE's management systems, applied technologies and information assets of its business. Examples of these are:

- Any documentation that is considered SLE's Intellectual Property as it is its R-QES IMS
- Company records such as Human Resources, Plant & Equipment, SLE's manufacturing methods, clients' product specifications, project scopes, and contracts terms.
- Media material displays in social media and/or any other digital platform
- handling and storage of sensitive material and/or password protected

SLE's staff and stakeholders with access to SLE's data and documented information shall protect and do not disclose them without a prior authorisation of SLE's management.

Doc No: SLE P016 Rev.0  
Date: 29/07/2020

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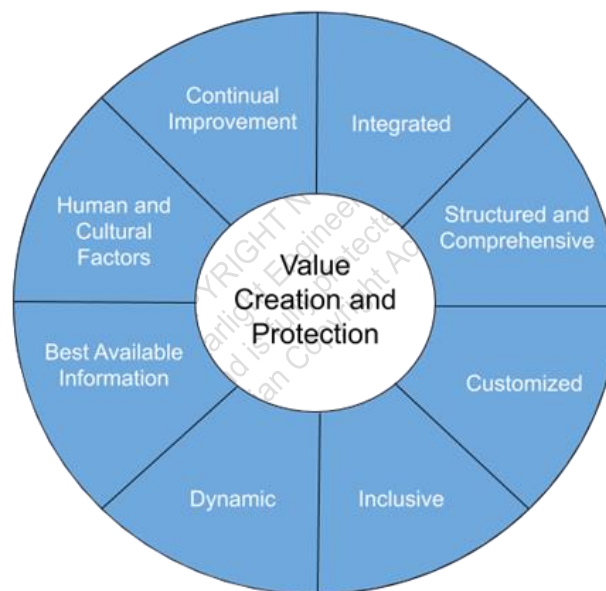
# R-QES IMS Manual Abstract

## SLE-0010 Risk Management

This system element provides a framework on managing risk faced by Starlight Engineering (SLE). It is SLE's objective that this document provides a common approach to managing any type of risk across all levels on its organisational structure. SLE's risk management includes the uncertainties of project and contract management which are addressed in the system elements SLE-0020 and SLE-0030 respectively.

### 1. Principles – Value Creation & Protection

The purpose of this system element is the creation and protection of the SLE's assets including Intellectual Property; as improves performance, empower innovation and supports the implementation of SLE's strategies and objectives represented by its Key Performance Indicators.



Framework – Source: ISO 31000 Risk Management

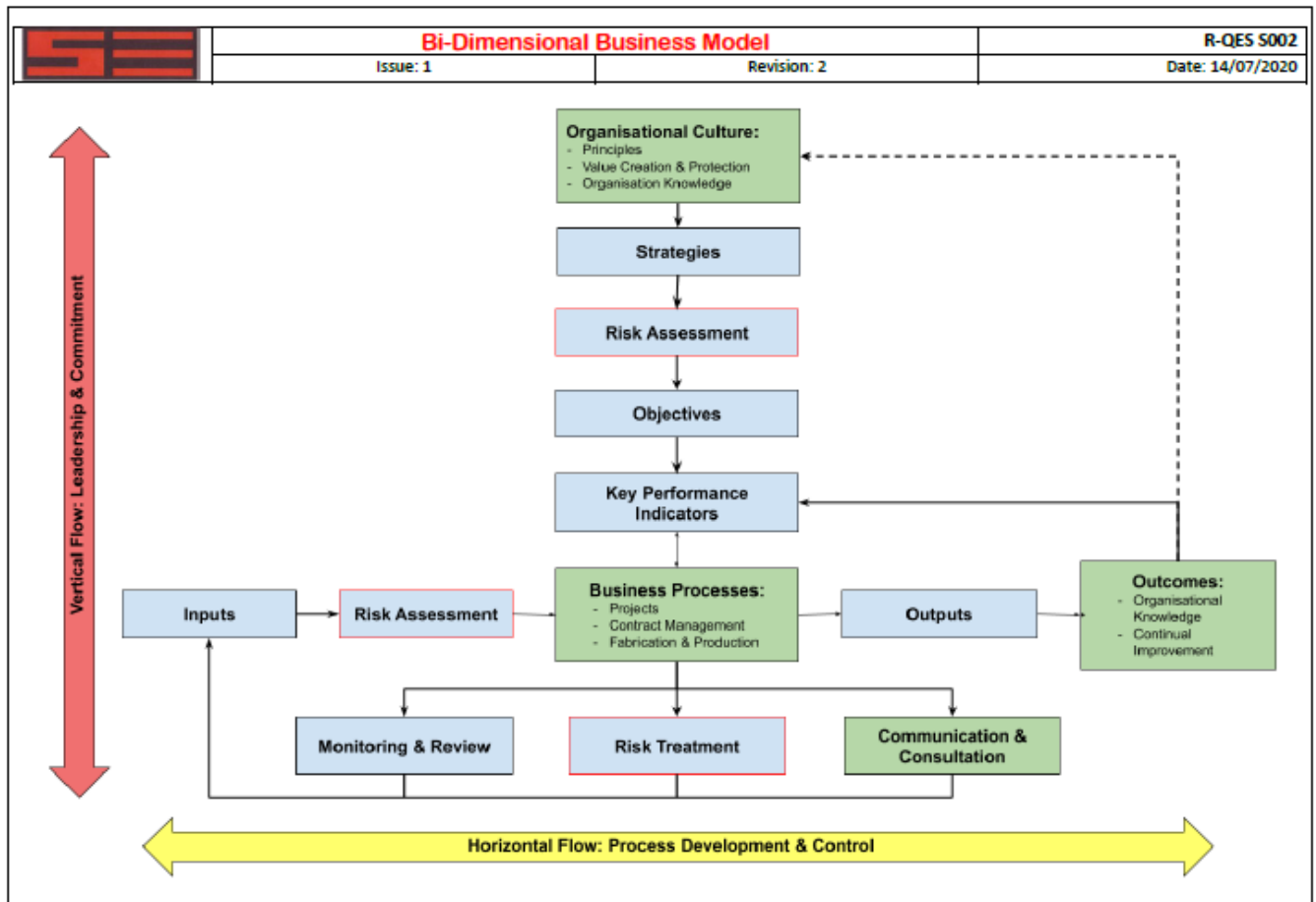
### 2. Risk Assessment Methodology

**Consequence x Likelihood = Risk Rating**

Likelihood	Consequences				
	5 Catastrophic	4 Major	3 Moderate	2 Minor	1 Insignificant
5 - Almost Certain	25	20	15	10	5
4 - Likely	20	16	12	9	4
3 - Possible	15	12	9	6	3
2 - Unlikely	10	8	6	4	2
1 - Rare	5	4	3	2	1



### 3. Bi-Dimensional Business Model



## SLE-0020 Project Management

This R-QES system element provides guidelines to manage projects, programmes and portfolios within Starlight Engineering (SLE) capabilities under a Risk management framework. SLE is committed to offer guidance for addressing clients' changes in engineering design, project variations and projects risks.

### 1. Governance framework

SLE's governance structure is based in compliance to the Australian legislation, and adherence to ISO standards and industry best practices. The components of this structure are:

- policies, processes and methods to be used to undertake the activities and practices defined in this system element.
- management frameworks, including projects life cycles.
- roles and responsibilities, including limits of authority for decision making

### 2. Business case

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Most projects are valued in advance as SLE's participation in delivering outcomes are determined by their scope, delivery requirements and the following business case elements:

- a) potential benefits to be realised;
- b) defined metrics to evaluate the value being;
- c) risk visibility and management's risk attitude;
- d) budget, schedule and quality requirements;
- e) schedule required, potential business and disruptions to other organisational operations;
- f) stakeholder engagement and relationship management;
- g) effective communications;
- h) human and material resources use;
- i) skills, knowledge and capabilities required;
- j) ability to sustain business and organisational activities through change.

### 3. Managing practices for a project

SLE's application of the concepts and practices is described in ISO 215002:2020 Project, programme and portfolio management. The application of the standard elements for a given project will depend on the project's context and SLE's delivery approach used.

## SLE-0030 Contract Management

This R-QES system element provides guidelines to manage general contracts that are required by SLE's clients and/or suppliers. Its purpose is to improve SLE's compliance to its policies and strategies; and provide a framework for a consistent approach to its contract administration.

### 1. Contract Administration

Planning in advance is implemented in all SLE's contracts as it is as described in R-QES IMS system element SLE-0010 Risk Management.

After a Risk Assessment, SLE's Risk Register is updated as necessary to take into account any changes to the contract's risk profile from the signature date or by the Letter/Email of Acceptance whichever is first until the issue of the Final Certificate or Letter of Deed Release acknowledging the project completion or contract closure.

The Contract may still need to be reviewed during the Defects Liability Period as the risk profile may change.

### 2. Communications

SLE shall maintain an effective and timely communication channels within the project team and key contract stakeholders as described in its R-QES IMS system elements and its relevant Standard Operating Procedures (SOP).

The Project Manager/Contract Administrator should organise periodical coordination meetings. The main purposes of these meetings are to:

- review progress to date and future programmed Works
- discuss any issues affecting time, cost or quality
- discuss status of identified high risk areas: site access, work health and safety matters, environment, community concerns, etc.
- where necessary, modify the contract risk register and impacts to the project



- where optioned, discuss and record the opportunities for improvement and/or areas of concern.

Generally, contractual issues (invariably claims and disputes) are best left to meetings called specifically for the purpose, as only relevant staff are needed for such meetings

### 3. Extensions of Time (EOT) for Practical Completion

Throughout the contract, situations may arise where SLE may need to give notice of a claim for an Extension of Time for Practical Completion. The causes might be:

3.1 events occurring on or before the Date for Practical Completion which are beyond the reasonable control of the Contractor, including:

- i) industrial conditions
- ii) inclement weather

but not including a delay, breach, act or omission by any Subcontractor or any of the SLE's employees

3.2 any of the following events whether occurring before, on or after the Date for Practical Completion:

i) delays caused by:

- the Principal
- the Project Manager and/or Contract Administrator
- the client's employees, consultants, other Contractors or agents and other Authorities

ii) actual quantities of work in the Schedule of Rates being greater than the quantities determined by the reference Quote

3.3 Latent Conditions are physical conditions on, underlying or adjacent to the site that could not be identified by SLE by reasonable observations or investigations of the site or the site information provided in the tender documentation at the time that the tender for the works was being prepared.

By virtue of its definition, an Extension of Time for Practical Completion is for an event affecting the project critical path and will invariably give rise to a claim for associated costs (both on and off-site overheads) with the Contractor having to work on site for longer than indicated in the tender. An assessment of the costs has to be made by the Contract Administrator including a reasonable amount for profit and overheads.

Approved Extension of Time for Practical Completion claims usually have associated costs which shall be properly recorded. The cost records can be kept separately in the project Extension of Time for Practical Completion Register and need to be incorporated in the total accrued costs for financial reporting.

### 4. Notices, Claims and Variations

A variety of notices and claims may be submitted by SLE's Project Manager/Contract Administrator under a number of clauses of the client's General Conditions of Contract.

SLE's PM/CA is required to deal with these matters in accordance with the Contract and give a decision or a determination. If it is decided that all or part of the notice or claim has a basis under the Contract, then a direction and/or a Variation Order shall be issued by the client. If the notice or claim has no basis under the Contract, it will be rejected by the client.



Most General Conditions of Contract specify the time-period that these Notices, Claims and Variations need to be submitted. If the contract does not expressly state these time-periods, the client might not be liable upon any Claim by SLE arising out of or in connection with any alleged breach of the Contract, in tort, under any statute, for payment or compensation on the basis of restitution, or for payment or compensation on any other legal or equitable basis.

It is preferred that a Variation Order is obtained after an agreement with a client has been reached with respect to cost and time (delay) implications. Using this methodology, the SLE's PM/CA is less likely to be involved in a dispute with the client and should have a better relationship.

The most contentious type of variation is one that, following a direction from the client, the work is carried out urgently by SLE as directed, and then arguments ensue as to the time and cost implications.

A written notice of claim must be formally served on the client within the time-period and using the 'Notice Title' specified on the client's General Conditions of Contract.

## SLE-0040 Organisational Context

This management system element defines the organisational context in which SLE has to create, maintain and develop businesses. This also implies the currency of its Quality Environment & Safety Integrated Management System by which is created, maintained and reviewed for its adequacy, currency and effectiveness.

### 1. Understanding the organisation and its context

SLE operates in steel fabrication industry, which is mainly tied to infrastructure construction projects and the supply of steel which in many cases are imported.

The Australian structural fabrication industry is characterised by a very large number of fabricators with a total output capacity of approximately 1.6 million tonnes per annum, including some product used in repetition manufacturing, lintels, truck body and trailer fabrication. One of the largest the steel industry sectors; Australian structural steel fabricators have committed heavily to new technology in recent times to meet the demands of new resources and infrastructure investments head on.

To date the impact of the global COVID-19 pandemic in Australia, still is has not fully quantified but it is expected that for the next 12 months the industry will reflect at all levels the current economic constraints

### 2. Understanding the needs and expectations of interested parties

SLE main interested parties are staff, clients and suppliers as their development are closely aligned to SLE industry position and positive business outcomes. SLE main source of work are infrastructure and engineering contracts available from State and Federal Government level, and also from the local building and construction markets.

### 3. Determining the scope of SLE's R-QES IMS

Starlight Engineering Pty. Ltd. scope is the result of a number of capabilities evaluations and SWOT analysis for the provision of fabrication, welding, repair, installation and project support services for metal structures and products.

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Starlight Engineering Pty. Ltd. is entrusted to fulfil the requirements of the current legislation, its regulatory obligations and Australian Standards as highlighted in section 4 of this system element.

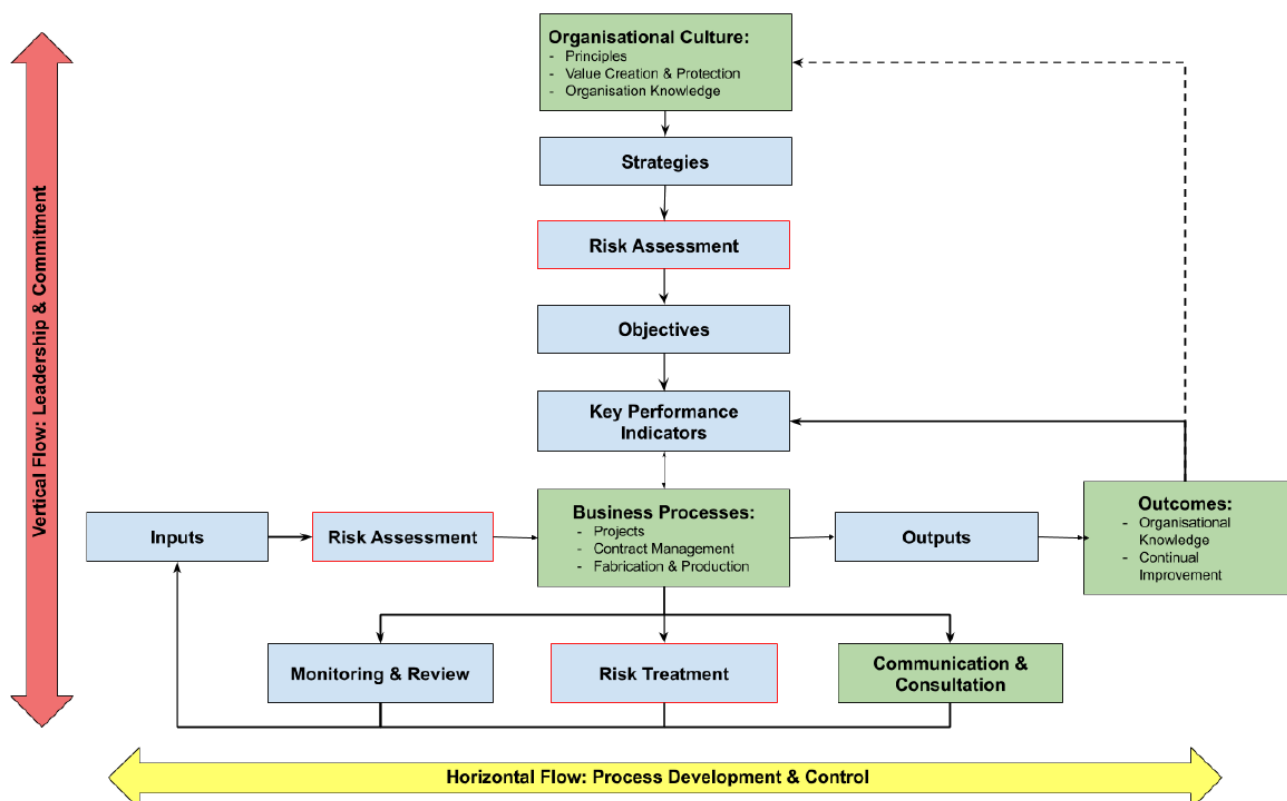
The following principles underpin Starlight Engineering commitment towards to quality, environmentally sustainable and work safe under a controlled risk management framework:

- Understanding the business environment and impacts of our operations
- Have the flexibility to change and/or adapt SLE business structure if required.
- Ensuring that all staff and our contractors are aware of SLE QES IMS objectives and the expectations placed on them.
- Measuring our performance against agreed KPIs.
- The assessment, promotion and implementation of sustainable techniques and technology for the benefit of SLE and its stakeholders.
- To promote and maintain a work safe and sustainable business enterprise and to abide by the principles of the industry best practice.

SLE acknowledges the world challenges in terms of environment and preservation of natural resources consequently we recognise our part in reducing the use of resources with the provision when is possible of sustainable quality products and services.

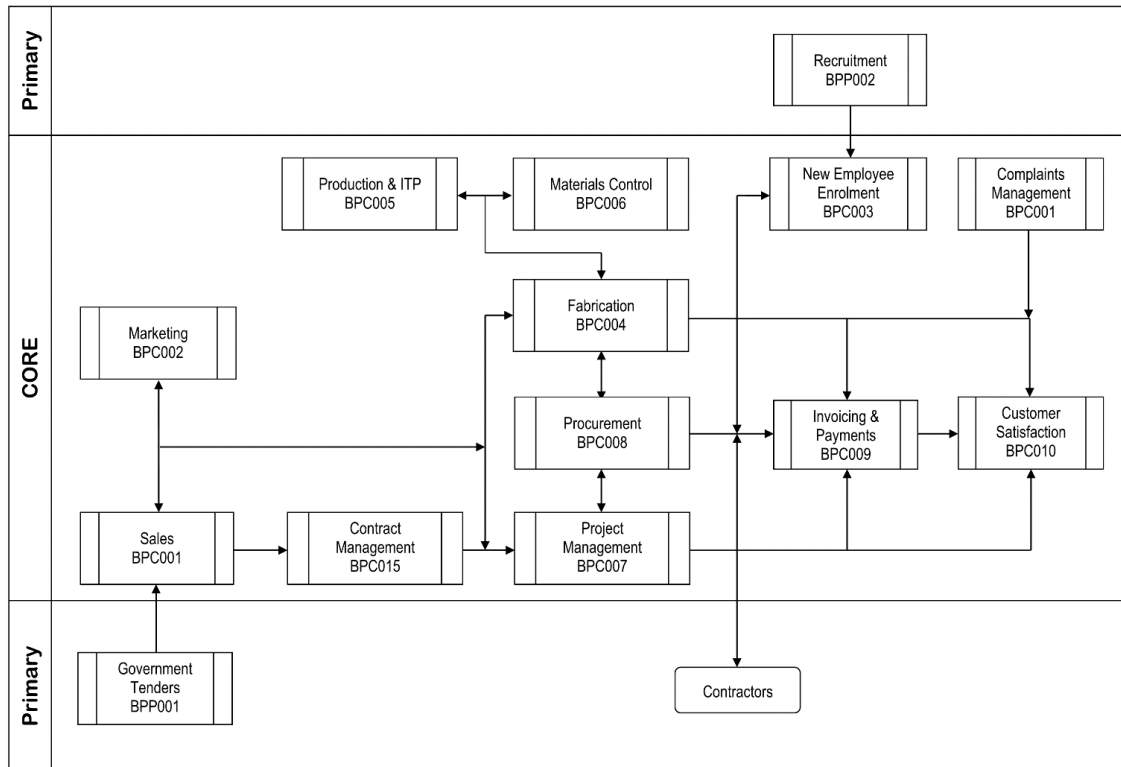
## 4. R-QES IMS and its processes

### 4.1 Strategic Framework





## 4.2 Business Value Added Management



## 4.3 Business Risk Management

STARLIGHT ENGINEERING - Business Risks Review				QES F003
Issue No: 1	Revision No: 5	Date: 28/07/2020		Page 1 of 1

COMPANY POLICIES		BUSINESS PROCESSES							
		Marketing	Sales	Fabrication	Contract Management	Project Management	Procurement	Invoicing & Accounting	Customer Satisfaction
SLE P001	Quality	M	H	H	H	H	H	L	H
SLE P002	Risk Management & Auditing	H	H	H	H	H	H	H	H
SLE P003	Work Health & Safety	H	H	H	H	H	M	L	L
SLE P004	Anti-discrimination & Harassment	L	L	L	M	H	L	L	L
SLE P005	Injury & Rehabilitation	L	L	H	L	H	L	L	L
SLE P006	Smoking, Drug & Alcohol	L	L	M	L	M	L	L	L
SLE P007	Environmental Sustainability	H	H	H	H	H	M	L	L
SLE P008	Hazard Management	L	L	H	M	H	M	L	L
SLE P009	Information Communication Technology	L	M	L	H	H	M	M	M
SLE P010	Privacy	H	H	L	H	H	M	H	H
SLE P011	Procurement	L	L	H	H	H	H	L	L
SLE P012	Corporate Relationship Management	H	H	L	H	H	H	M	H
SLE P013	Community & Stakeholder Relations	H	H	L	H	H	L	L	H
SLE P014	Anti-bribery & Corruption	H	H	L	H	H	H	L	L
SLE P015	Humanity Development	H	H	M	H	H	H	L	M
SLE P016	Digital Enterprise & Cyber Security	H	H	L	H	H	H	H	H

**Risk Level:** H = High Risk (Risk Rating: 16-25) M = Medium Risk (Risk Rating: 10-15) L = Low Risk (Risk Rating: 5-9)

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## SLE-0050 Leadership

This system element defines the process by which SLE's leadership is applied to its Risk Quality Environment & Safety Integrated Management System, by which is created, maintained and reviewed for its adequacy, currency and effectiveness.

### 1. Leadership and commitment

Starlight Engineering Pty Ltd provides services for the fabrication, welding, repair, installation and project support for metal structures and products.

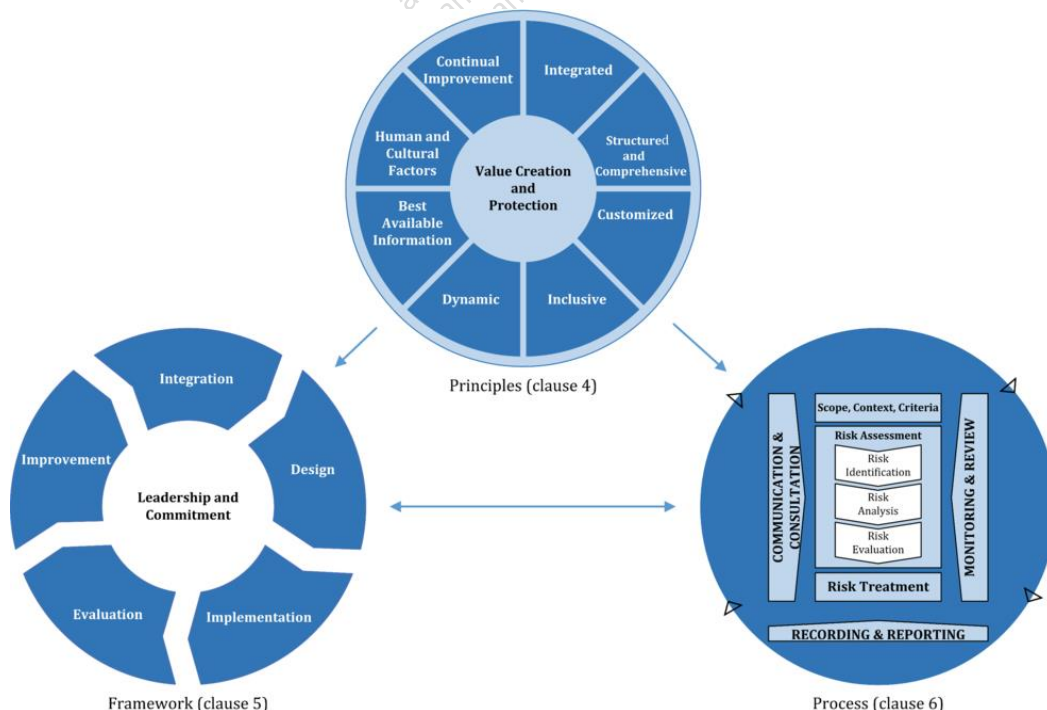
These core business activities are supported by projects managers with an integrated Quality Environment & Safety culture and adaptable manufacturing facilities.

It is Starlight Engineering policy that Quality, Environment & Safety Management principles are the basis on which our services and operations are being developed and delivered. Starlight Engineering Pty Ltd labour services are supported by flexible, qualified, competent and responsible staff.

SLE's business optimisation philosophy and continuous improvement programs are develop with customer focus within a value-added framework.

SLE's contractors and suppliers are encouraged to be efficient, professional and actively participate within our Quality Management policy and initiatives.

SLE staff are encouraged to be innovative and creative. Training is being delivered in business/technical skills, career development and quality management, to ensure that staff understand and embrace quality as an active philosophy. SLE's top management follows the below Risk Management ecosystem.



Source: ISO 31000:2018 Risk management – Principles and Guidelines



## 2. Customer focus

Our Mission is to provide an excellent standard of services and high-quality products for our customers and community in accordance with our Business Plan creating a continuous improvement culture.

Our Goal is to be a professional, efficient and profitable business providing value for money in our products/services in a safe manner achieving agreed prices maintaining our profits margins by delivering quality within customers' time frames.

## SLE-0060 Planning

This system element covers all processes of SLE's QES IMS and regulates the activity of SLE's top management and R-QES Coordinator, in relation to planning that can be applied to all SLE's governance, management and operations, whatever its nature, whether having positive or negative consequences.

### 1. R-QES objectives and planning to achieve them

All SLE relevant personnel should be trained in planning methods and techniques, including performance monitoring and reporting.

The objectives of SLE's Planning:

- Outline SLE approach to planning in the pursuit of SLE's business goals and strategic objectives.
- Improve decision-making, accountability and outcomes through the effective use of planning techniques.
- Integrate planning principles (e.g. scheduling, project management, etc.) into SLE's operations; and
- Business Reviews and Internal/External Audits will support SLE's planning for performance monitoring to provide assurance on their efficiency and relevance to SLE's strategic objectives and operational performance.

All SLE plant, workshop machinery, and critical equipment should have their preventive maintenance planned as per manufacturers guidelines. Records of this planning need to be kept for compliance to the work health and safety Act.

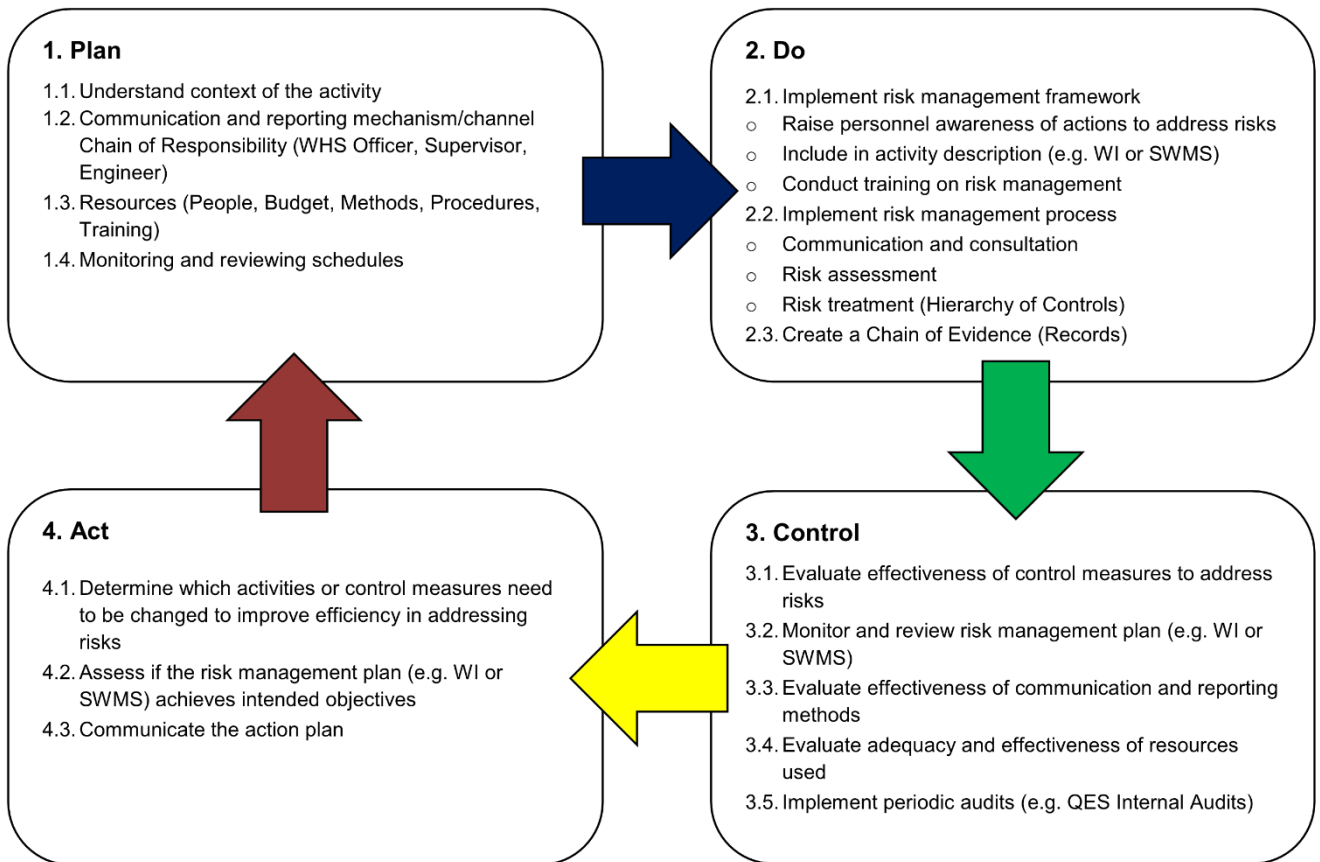
### 2. Planning methodology

SLE's R-QES IMS approach to planning is related to its Risk Management policy and system element SLE-0010 where it is highlighted SLE's actions to address risk and opportunities consist of carrying out the 'Plan-Do-Control-Act (PDCA)' methodology phases as illustrated in Figure 1.

This methodology shall be continuously used to implement and monitor new projects, work schedules and/or their specific activities of their work breakdown structure and review their performances against agreed objectives and/or milestones.



**Fig. 1 – Actions to address Risk & Opportunities Diagram**



### 3. Planning of changes

The introduction and/or implementation of changes require planning as any change might cause changes and/or adaptation to other SLE operations.

In addition to strategic/business changes, SLE operational areas are the most noticeable and challenging areas to implement and/or introduce changes as involve staff, plant, equipment and work methods such as SWMS.

### 4. Work scheduling

SLE's shall be aware that the process of planning primarily deals with selecting the appropriate policies and procedures in order to achieve the project objectives.

Scheduling converts the project action plans for scope, time cost and quality into an operating timetable. In summary, planning defines WHAT and HOW, while scheduling defines WHEN and WHO.



## SLE-0070 Support

This system element defines the process by which the adequate resources to support, maintain and enhance the integrated Risk - Quality Environment and Safety Management System is properly delivered.

### 1. Resources

SLE has determined and provided resources needed to establish, implement, maintain, and continually improve its QES IMS considering the capabilities of, and constraints on, existing internal resources; and what needs to be obtained from external providers.

Having adequate resources is vital to ensure product conformity and/or satisfy customer requirements as it is stated in SLE quality objectives to ensure timely production and delivery of product and services.

SLE through business planning and QES management planning include planning for any changes to identify and determine the nature of resources need on each QES process and plan for its availability.

#### 1.1 People

The provision of HR is through appointments for merits against a set of competencies format scripts in an approved position description.

The recruitment process covers Starlight Engineering Human Resources requirements as specified in SLE Selection and Job Descriptions and summarized in QES-F021 Staff Skills Matrix and policies in relation to Equal Employment Opportunities as it is shown in the attached Recruitment Business Process BPP002 and Staff Conditions of Employment SLE-M005

Starlight Engineering staff's conditions of employment are set in full compliance of the relevant Federal Awards.

#### 1.2 Infrastructure

Starlight Engineering's facilities follow and comply with the provisions of Building Environment regulations as per Industry standards. Project site workshops are considered part of these facilities.

SLE has determined, provided, and maintains the infrastructure for the operation of its business processes to achieve conformity of products and services. SLE's infrastructure includes buildings and associated utilities; equipment including hardware and software; transportation resources (internal and external); and information and communication technology.

Workshop/Site inspections (QES-F016) are regularly performed and their non-conformances and/or areas of improvement findings are timely reported by Process Improvement Reports (QES-F019) and actions reviewed during SLE Management Review Meetings.

#### 1.3 Policies, Business Processes and Procedures

Starlight Engineering have developed and implemented a number of policies, processes and procedures to support its business objectives and operational requirements which include compliance to the Australian legal framework and best practices.

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### 1.3.1 Company Profile and Management Plans

SLE M001	Company Profile & QES Manual (Abstract)
SLE M002	Work & Industrial Relations Management Plan
SLE M003	Safety & Emergency Management Plan
SLE M004	Sustainability Management Plan
SLE M005	Staff Conditions of Employment
SLE M006	External Providers Conditions of Association
SLE M007	Business Continuity Management Plan

### 1.3.2 Standard Operating Procedures

SOPs are part of SLE's QES IMS to explain and instruct on how and when relevant documentation and their records must be completed. SOPs also facilitate the application and development of the SLE policies and business processes.

Moreover, the management of Environmental, Health and Safety hazards arisen during SLE operations and business practices e creation, maintenance and recording of SLE actions that are related to hazards identification, control and execution of their mitigation and/or elimination.

The types of SOPs are:

<b>SOP M :</b>	These have focus in <u>management</u> and they are:
SOP M001	Hazard Management
SOP M002	Traffic Management
SOP M003	Manual Tasks
SOP M004	Incident Management
SOP M005	Anti-discrimination & Harassment Management
SOP M006	Drug & Alcohol Management
SOP M007	Project Management
SOP M008	Transport Management
SOP M009	Fusion Welding of Metallic Materials
SOP M010	Sustainability Management
SOP M011	Information Communications Technology Management
<b>SOP C :</b>	These have focus in <u>control</u> and they are
SOP C001	Creation of QES Documents
SOP C002	Control of Welding Consumables
SOP C003	Assets Valuation & Revaluation Procedure
SOP C004	Control & Management of Materials
SOP C005	Use & Maintenance of Tools, Plant & Equipment

### 1.3.3 Work Instructions

A Work Instruction (WI) is a set of written instructions that identifies issues that may arise from the jobs and tasks that make up a system of work. These work instructions should assist SLE to perform its work activities in a safe, environment conscious and in compliance to Australia current legislation.

The types of Work Instructions are:

<b>WI E :</b>	These are environmental related applications through all SLE activities
WI E001	Preventing and Managing Snake Bites
WI E002	Preventing and Managing Redback Spider Bites





## WI E003 Spill Kit Management

**WI G :** These are of general application through all SLE activities

WI G001	General Health & Safety
WI G002	Safe Use of Electrical Equipment
WI G003	Manual Handling
WI G004	Use of Ladders & Stepladders
WI G005	Housekeeping
WI G006	Noise Management
WI G007	Working Outdoors & Heat Stress
WI G008	Handling Hazardous Materials
WI G009	COVID-19 Management

**WI W :** These are of work related applications through all SLE operations

WI W001	Safe Welding
WI W002	Gas Cutting
WI W003	Safe Operation of Grinders
WI W004	Safe Operation of Multicutters Grinding
WI W005	Spray Painting Safety
WI W006	Operation of Rotary Hammer Drill & Drills
WI W007	Operation of Plate Four Rollers
WI W008	Operation of Punch & Shear
WI W009	Operation of Hydraulic Guillotine
WI W010	Operation of Band Saw

**WI P :** These are for the usage of SLE tools, vehicles, plant & equipment.

WI P001	Forklift Operations
WI P002	General Crane Lifts
WI P003	Isolation of Tools, Plant & Equipment
WI P004	Use of Vehicles & Plant
WI P005	Washdown of Vehicles, Plant & Equipment
WI P006	Mobile Operations Unit
WI P007	Safe Use of Jump Battery Pack
WI P008	Safe Workshop Entry (Trucks With / Without Trailers)

**WI S :** These are related to services and support activities

WI S001	Refuelling of Plant
WI S002	Oil, Fuel, Chemical Storage
WI S003	Oil, Fuel, Chemical Spillage Management

### 1.3.4 Safe Work Method Statements (SWMS)

#### Purpose

The primary purpose of a SWMS is to enable supervisors, workers and any other persons at the workplace to understand the requirements that have been established to carry out the high-risk work in a safe and healthy manner. It sets out the work activities in logical sequences and identifies hazards and describes control measures.

Any activity, no matter how simple or complex can be broken down into a series of basic steps that will permit a systematic analysis of each part of the activity for hazards and potential incidents. The description of the process should not be so broad that it leaves out activities with the potential to cause incidents and prevents proper identification of the hazards nor is it necessary to go into fine detail of the tasks.



The aim of a SWMS is to:

- describe the activity or task to be undertaken
- identify the resources, manpower and skills associated with the task
- assess and select control measures (as appropriate)
- systematically plan the activity so it can be completed efficiently and effectively.

A SWMS should also include the following information:

- the person conducting a business or undertaking's name, address and ABN (if they have one)
- details of the person(s) responsible for ensuring implementation, monitoring and compliance with the SWMS
- if the work is being carried out at a site project:
  - the name of the principal contractor
  - the address where the high-risk work will be carried out
  - the date the SWMS was prepared and the date it was provided to the principal contractor
  - the review date (if any).

A SWMS may also include the names of workers that have been consulted on the content of the SWMS, the date the consultation occurred and the signature of each worker acknowledging their participation in this consultation and the opportunity to discuss the proposed measures.

#### Preparation

A person conducting a business or undertaking (PCBU) that includes the carrying out of high-risk work must ensure a SWMS is prepared or has already been prepared by another person before the proposed work commences.

If more than one PCBU is involved in the high-risk construction work then each PCBU involved in the same matter must, so far as is reasonably practicable, consult, cooperate and coordinate activities with all other PCBUs. A PCBU (in consultation with workers who will be directly engaged in the high risk work) is best placed to prepare the SWMS because they understand the work being carried out and the workers undertaking the work and can ensure the SWMS is implemented, monitored and reviewed correctly.

There may be situations where there are different types of high-risk work occurring at the same time at the same workplace

### 1.4 Environment for the operation of processes

SLE has determined, provided, and maintains a harmonious and safe work environment necessary for the operation of its business processes to achieve conformity of its products and services. A suitable environment for SLE's operation of processes can be a combination of human and physical factors such as social (e.g. non-discriminatory, calm, non-confrontational etc.), psychological (e.g. stress reducing, burnout prevention, emotional protective), physical (e.g. temperature, heat, humidity, light, airflow, hygiene, noise).

Some of these factors need to be considered in determining and managing the work environment include ergonomics (worker movement; fatigue; manual effort and loads, etc.), workplace location, heat, light, humidity, airflow, noise, vibration, hygiene, cleanliness, pollution, adequate facilities (lunchroom, washrooms, etc.); health and safety regulations; housekeeping; etc. the extent to which the above environmental factors may apply to any organization will vary based on size, risk and other considerations.

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The wellbeing of Starlight Engineering's staff and workplace is ensured for the compliance of the Environment and Workplace Health & Safety Acts. Requirements of these compliances are site inductions, risk assessments, safe work method statements, workshop/site inspections etc.

The compliance of these requirements is part of SLE's R-QES IMS audit plan.

## 1.5 Monitoring and measuring resources

### 1.5.1 *General*

SLE determines and provides the resources needed for valid and reliable monitoring and measuring results, where monitoring or measuring is used for evidence of conformity of products and services to specified requirements.

SLE retains appropriate documented information as evidence of fitness for purpose on the utilisation of monitoring and measurement resources with their outcomes.

### 1.5.2 *Measurement traceability*

Where measurement traceability is a requirement (statutory or regulatory or customer or relevant interested party expectation) or considered by SLE to be an essential part of providing confidence in the validity of measurement results, It is important that measuring instruments must be verified or calibrated at specified intervals or prior to use against measurement standards traceable to international or Australian Standards.

The organization must retain the basis used for calibration or verification as documented information if no such standard exists as documented information.

To ensure valid measurement and monitoring results, Monitoring and Measurement Devices' must be controlled. A process is required, to control the identification of monitoring measurement, selection, purchase, status, identification, calibration, verification, adjustment or re-adjustment, use, handling, maintenance and storage, training, handling of nonconforming Monitoring and Measurement Device's, etc. SLE shall keep appropriate records to demonstrate effective operation and control of its Monitoring and Measurement Devices processes. These records shall include calibration and verification records traceable to national, international or other benchmark used for calibration.

SLE's quality plan must define the measurement and monitoring required and the type of Monitoring and Measurement Device needed for it, including the frequency of measurement and acceptance criteria.

## 1.6 Organisational knowledge

SLE's Knowledge Management elements for the main business processes are summarised in the below table indicating their priorities in assisting SLE's objectives.

SLE is a learning organisation as most of the projects that is involved are new and/or require unique skills and working methods. SLE has implemented an appropriate system for learning from experience, including lesson learning.

There is an appropriate approach to knowledge retention, including mentoring, tacit knowledge capture, knowledge sharing. SLE has also developed a practical form of organizational knowledge audit, organizational knowledge benchmarking and organizational knowledge strategy, sufficient to identify the critical knowledge needed to deliver quality products and

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services, and the main knowledge gaps. Moreover, SLE has a system (roles, processes and supporting technology) for maintaining knowledge and continuous improvement.

### Organisational Knowledge Priorities

	Know-How	Maintenance	Improvement	Review
Marketing	1	2	1	2
Sales	1	2	2	1
Procurement	3	2	2	1
Project Management	1	2	1	1
Contract Management	1	1	1	1
Fabrication	1	2	1	1
Production & Inspection Testing Plan	1	3	3	1
Materials Control	3	1	2	1
Invoicing & Payments	3	2	3	1
Customer Relationship Management	1	2	2	1

Legend: 1 = Expert, 2 = Moderate, 3 = Basic

#### 1.6.1 Competence

SLE determines the necessary competence of person(s) doing work under its control that affects the performance and effectiveness of their workmanship under its QES IMS.

SLE ensures that these persons are competent on the basis of appropriate education, training, or experience and where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken.

All these efforts are documented as evidence of competence. Some of the applicable actions that SLE provides are on the job training, plant and equipment safety and operational inductions, mentoring, or reassignment of currently employed persons; or hiring or contracting of competent persons.

#### 1.6.2 Awareness

All SLE personal and/or contractors are aware of SLE's QES IMS policies, objectives, processes and on how to contribute to the effectiveness of the QES IMS, including benefits of improved performance; and the implications of not conforming to SLE system requirements.

SLE continuous improvement philosophy includes in learning from our experiences such as changing processes, improving procedures, rotating jobs, outsourcing, or recruiting fully trained and competent people. SLE's criteria for competency is developed based on appropriate education, skills, training and experience for activities, tasks, functions and processes. The level and detail of such qualifications, skills, training and experience will depend upon the complexity of product, process, technology and customer and regulatory requirements.

QES awareness is focused on meeting SLE's staff, customer and regulatory requirements and their objectives. The process to promote quality awareness includes methods such as – toolbox meetings, involvement in quality planning, improvement suggestions through Process



Improvement Reports (PIRs), product workshops, zero defect programs, product review checklist etc.

### 1.6.3 Communication

SLE recognises that communications are a complex and difficult activity as poor communication leads to chaos, poor performance, poor morale and affects SLE image to its customers and community.

SLE applies effective communication methods to foster a sense of community, teamwork and a clear sense of purpose and direction. We are aware that problems may arise due to incomplete, ambiguous or inaccurate information being transmitted; transmission to the wrong person, too late or at the wrong time; use of inappropriate or unreliable media, etc. and as a consequence, are the most common cause of R-QES IMS nonconformities.

SLE determines the quality and content of the company internal and external communications, including on what it will communicate; when to communicate; with whom to communicate; how to communicate. SLE embraces and provides training to its staff about the application of the below 7Cs of communication techniques: clear, concise, concrete, coherent, complete and courteous.

#### Internal communications

ENTITY	WHAT	WHEN	HOW/ HOW OFTEN	WHO
Staff	<ul style="list-style-type: none"> <li>Quality policy</li> <li>Applicable legislation and regulatory requirements</li> <li>Customer requirements</li> <li>Customer satisfaction</li> <li>All applicable policies and processes</li> </ul>	<ul style="list-style-type: none"> <li>At induction and refresher training</li> <li>After changes to policies or processes</li> </ul>	<ul style="list-style-type: none"> <li>Awareness training</li> <li>Newsletters</li> <li>Company/team meetings</li> <li>Intranet</li> <li>Notice boards</li> </ul>	Operational Manager/ Team leader
Shareholders	<ul style="list-style-type: none"> <li>corporate governance</li> <li>Results</li> </ul>	<ul style="list-style-type: none"> <li>Contract initiation and renewal</li> <li>After changes to policies or processes</li> </ul>	<ul style="list-style-type: none"> <li>Newsletters</li> <li>Intranet</li> <li>Annual report</li> </ul>	CEO/MD

#### External communications

ENTITY	WHAT	WHEN	HOW/ HOW OFTEN	WHO
Customer	<ul style="list-style-type: none"> <li>Product/ service agreement</li> <li>Quality policy</li> <li>Delivery</li> <li>Audits</li> <li>Improvements</li> <li>Risks</li> </ul>	<ul style="list-style-type: none"> <li>Contract initiation renewal or amendment</li> <li>After changes to policies or processes</li> </ul>	<ul style="list-style-type: none"> <li>Contract</li> <li>Service reviews</li> <li>Internet</li> </ul>	Manager/ Customer
Suppliers	<ul style="list-style-type: none"> <li>Contract agreement</li> <li>Quality Policy</li> <li>Contract amendments</li> </ul>	<ul style="list-style-type: none"> <li>Contract initiation and renewal</li> <li>After changes to policies or processes</li> </ul>	<ul style="list-style-type: none"> <li>Contract</li> <li>Service Review</li> </ul>	Purchasing Manager/ Purchasing
Regulators	<ul style="list-style-type: none"> <li>Applicable legislation and regulatory requirements</li> </ul>	<ul style="list-style-type: none"> <li>At contract start and refresher training</li> </ul>	<ul style="list-style-type: none"> <li>Awareness training</li> </ul>	Legal advisor/ HR Manager



ENTITY	WHAT	WHEN	HOW/ HOW OFTEN	WHO
	<ul style="list-style-type: none"><li>Changes in legislation and regulation</li></ul>	<ul style="list-style-type: none"><li>After changes to policies or processes</li><li>After taking on new work</li></ul>	<ul style="list-style-type: none"><li>Company/team meetings</li><li>Intranet</li><li>Notice boards</li></ul>	

#### 1.6.4 Documented information

Documented information is used by SLE to communicate messages such as policies, processes, work instructions, quotes etc. and provide evidence of what was planned has actually been done, or a knowledge sharing has occurred. Documentation Information is the information required to be controlled and maintained by SLE and the medium on which it is contained. It can be in any format and media and from any source such as paper, magnetic, electronic or optical computer disc, photograph, master sample, etc. It can refer to:

- QES IMS, including related processes;
- information created in order that SLE can operate (documentation);
- evidence of results achieved (records).

SLE's Documented Information main objectives are:

- Communication of Information: As a tool for information transmission and communication. The type and extent of the documented information will depend on the nature of the organization's products and processes, the degree of formality of communication systems and the level of communication skills within the organization, and the organizational culture.
- Evidence of conformity: Provision of evidence that what was planned has actually been done.
- Knowledge sharing
- To disseminate and preserve the organization's experiences. A typical example would be a technical specification, which can be used as a base for design and development of a new product or service.

#### 1.6.5 Creating and updating

SLE has ensured the following practices are in place when documented information is create and/or updated:

- **Identification:**  
Documents and records should have titles, document numbers, creation dates, revisions numbers, etc. that indicates their identity.
- **Format:**  
SLE documents must be usable for their purpose. Consequently, the format must be appropriate to the purpose and users, and the media must be accessible and understandable. As SLE's R- QES IMS documentation is uploaded to the cloud and storage in Dropbox Folders all mediums are electronic, then SLE staff can access them through a computer and/or other devices that can display them.
- **Review and approval for suitability and adequacy:**  
On delegation of SLE Managing Director the R- QES Coordinator must review and approve the documented information before it's used. Review and approval does have to be secure and traceable, meaning it must be clear who performed it and added in a records change and/or modification register.





#### 1.6.6 Control of documented information

SLE controls are based under the following principles:

- **Availability:**  
The documented information exists where it's supposed to exist. SLE has dedicated the resources to create the documented information and the information is suitable for the need it was intended to fill.
- **Protection:**  
SLE documented information is protected from tampering, unauthorized changes, and damage. People who should not see the documented information are prevented from seeing it. Appropriate safeguards have been put in place by SLE to ensure information isn't misused in any way. System passwords and employee training are part of SLE Information and Communications Technology policy.
- **Distribution:**  
SLE provides easy access to the documented information. On request SLE staff can be given access to SLE QES IMS Dropbox anytime and wherever they are so they do not struggle to find what they need, and they understand how to interpret its meaning and/or document intend.
- **Storage:**  
SLE specifies where the documented information is located. This applies to the retained documented information (records) and maintained documented information (documents). The location is accurate and verifiable, and there are controls to preserve the information.
- **Preservation:**  
Could include periodic backups of computer files and periodic monitoring to ensure continued legibility. The controls for "preservation" are very similar to the controls for "protection," described above.
- **Change control:**  
SLE is able to ensure that the correct versions of documented information are available. When documented information is revised, the revisions are incorporated into the information in use (after review and approval). There are safeguards in place to prevent employees from incorrectly accessing and using obsolete information.
- **Retention:**  
SLE say's how long to retain documented information. Every record in your system could conceivably have a different retention time, and the Australian Standards does not provide guidance on the retention times of records. This is completely up to the organization and its needs.
- **Disposition:**  
Refers to what happens to the record after the retention times has elapsed. Typical dispositions include archive, shred, or recycle.

An external document is published outside SLE and is used within the scope of the integrated management system. SLE addresses external documents and preventing unintended alterations of retained information. Examples of external documents possibly requiring control include:

- Troubleshooting and/or calibration manuals published by equipment manufacturers

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- Test procedures, specifications, and/or engineering drawings published by customers or other bodies
- Instructions, specifications, and/or procedures published by suppliers
- Australian and/or International standards such as ISO 9001:2015

Once external documents have been determined, they are identified and controlled. Like any internal documents, there must be a title, document number, or other unique identifier. Such identification typically comes from the source that publishes the document, and SLE simply adopts it.

#### 1.6.7 *Records Control*

Starlight Engineering's Risk, Quality Management System documentation types are:

1. SLE originated - as listed in SLE Master Records Register QES-F025
  - Hard Copies
  - Electronic Records
2. External Documentation - as listed in SLE External Documents Register QES-F026
  - Hard Copies: e.g. Manuals, Product/Services Warranties, etc.
  - Electronic Records

There are two types of Records: Principal and Secondary; when both record exists, the Principal is the master record.

#### 1.6.8 *Control of Electronic Records*

This procedure specifies the steps to be followed to ensure adequate security controls exist to protect SLE's computer systems and its environment as part of SLE Information Communications Technology (ICT) policy SLE-P009.

## SLE-0080 Operations

This system element defines SLE's overall operations management from inputs through its business processes to output and their outcomes including the controlling processes within the project/job scope/criteria, controlling planned change and addressing unintended change as necessary and/or required.

### 1. Operations planning and control

SLE plans, implements, and controls its processes to meet QES IMS requirements for the provision of products and services and to implement actions by determining product and services requirements.

These requirements can be served by establishing criteria for the processes and for the acceptance of products and services; determining the resources needed to achieve conformity to product and service requirements; implement control of the processes in accordance with the criteria; determining, maintaining and retain documented information to the extent necessary to have confidence that the processes have been carried out as planned and to demonstrate conformity of products and services to QES requirements.

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The output of this planning should be suitable for the SLE's operations. The organization should control planned changes and review consequences of unintended changes, taking action to mitigate any adverse effects, as necessary. The organization should ensure outsourced processes are controlled and current.

## 2. Requirements for products and services

### 2.1 Customer communication

SLE shall establish the processes for communicating with customers to provide information relating to products and services; enquiries, contracts, or order handling, including changes; obtaining customer feedback relating to product and services including customer complaints; handling or controlling customer property, and establishing specific requirements for contingency actions, when relevant.

### 2.2 Determining the requirements for products and services

SLE shall ensure, while determining the requirements for the products and services to be offered to customers that the product and service requirements (including those considered necessary by the organization), and applicable legal requirements, are defined.

The organization must also ensure that it has the ability to meet the defined requirements and substantiate the claims for the products and services it offers.

### 2.3 Review of the requirements for products and services

SLE ensures that it has the ability to meet the requirements for the offered products and services by implementing controls and reviews before committing to supply products and services to a customer. These controls/reviews should include the requirements specified by the customer, including the requirements for delivery, post-delivery activities and any requirements not stated by the customer, but necessary for the specified or intended use.

SLE ensures that contract or order requirements differing from those previously defined are resolved. When the customer does not provide a documented statement of their requirements, SLE must confirm them in writing before accepting them.

SLE should retain documented information on the results of the review and on any new requirements for the products and services.

### 2.4 Changes to requirements for products and services

SLE should ensure that relevant documented information is amended, and that the users and relevant persons are made aware of the changed requirements.

SLE changes requirements should include in their processes the following types of communication with customers:

- Product and service information, including customer requirements
- Documented agreements with the customer, such as contracts, orders, changes, and other information needed to meet customer requirements
- Customer feedback including complaints
- Any variations to the original scope of works and/or contingency actions that are relevant to the customer order.

## 3. Design and development planning

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SLE should establish, implement, and maintain a design and development processes that are adequate for the production of products and the provision of services.

While planning for design and development, SLE shall consider the following in determining the stages and controls for design and development:

- the nature, duration and complexity of the design and development activities;
- the required process stages, including applicable design and development reviews;
- the required design and development verification and validation activities;
- the responsibilities and authorities involved in the design and development process;
- the internal and external resource needs for the design and development of products and services;
- the need to control interfaces between persons involved in the design and development process;
- the need for involvement of customers and users in the design and development process;
- the requirements for subsequent provision of products and services;
- the level of control expected for the design and development process by customers and other relevant interested parties;
- the documented information needed to demonstrate that design and development requirements have been met

#### 4. Control of externally provided processes, products and services

SLE shall ensure that externally provided processes, products, and services conform to specified requirements by applying the specified requirements for control of externally provided products as a result of SLE's decision to outsource a process or function.

SLE should also determine and apply criteria for evaluation, selection, monitoring of performance, and re-evaluation of external providers based on their ability to provide processes or products and services in accordance with specified requirements.

SLE shall ensure the adequacy of specified requirements prior to their communication to external providers. This communication should be related to the following:

- products and services to be provided or the processes to be performed on behalf of the organization;
- approval or release of products and services, methods, processes or equipment;
- competence of personnel, including necessary qualification;
- their interactions with the organization's quality management system;
- control and monitoring of the external provider's performance to be applied by the organization;
- verification activities that the organization, or its customer, intends to perform at the external provider's premises.

Externally provided processes, products and services include:

1. purchasing from a supplier
2. an arrangement with an associate company
3. outsourcing processes to an external provider.

The controls required for external provision can vary widely depending on the nature of the processes, products and services. SLE can apply risk-based thinking to determine the type and extent of controls appropriate to external providers and externally provided processes, products and services.



## 5. Production and service provision

### 5.1 Control of production and service provision

SLE should implement production and service provision under controlled conditions. These controlled conditions as applicable can be:

- availability of documented information that defines characteristics of products and services.
- availability of documented information that defines activities to be performed and results to be achieved.
- availability and use of suitable monitoring and measuring resources
- implementation of monitoring and measurement activities at appropriate stages to verify that criteria for control of processes and process outputs, and acceptance criteria for products and services, have been met.
- use and control of suitable infrastructure and process environment for operation of process.
- appointment of competent person and, where applicable, required qualification of persons;
- validation, and periodic revalidation, of ability to achieve planned results of any process for production and service provision where resulting output cannot be verified by subsequent monitoring or measurement.
- Implementation of products and services release, delivery, and post-delivery activities.

### 5.2 Identification and traceability

SLE should use suitable means to identify “process outputs” where necessary to ensure conformity of products and services with respect to monitoring and measurement requirements throughout production and service provision.

To accomplish this SLE has to control unique identification of process outputs where traceability is a requirement. It should retain any documented information necessary to maintain traceability. Process outputs are results of any activities which are ready for delivery to customer or to an internal customer (e.g., receiver of inputs to next process). Process outputs can include products, services, intermediate parts, components, etc.

There are three distinct control requirements:

Product identification: It means knowing the identity of SLE or customer supplied product from incoming receipt of materials, raw material storage, use in production, work in progress, finished product storage, and delivery of product to the customer. Product identification can be controlled using physical and electronic methods.

Product status: It means knowing the quality status of materials and product through each of the above stages. Product status can be controlled using physical and electronic methods.

Unique Product Identification: This usually involves keeping detailed records of SLE products such as material, equipment, personnel, processes, production, inspection and test details, etc., for individual products or production batches. These records help to trouble-shoot product and process problems, resolve customer complaints, and enables continual improvement of product and process. In many instances, it also reduces cost, risk and use of resources by narrowing the problem down to a specific cause or instance.

Examples of product identification and test status include physical tags, bar code labels linked to computer records; materials requirement planning (MRP) systems tracking specific production runs/lots, automated production transfer processes, etc. Performance indicators to measure the effectiveness of processes that control identification and traceability may include reduction in identification errors and omissions; product quality status errors and omissions; and traceability errors and omissions.

### 5.3 Property belonging to customers or external providers

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SLE should exercise care with property belonging to customers or external providers while under its control or being used by SLE. This implies the identification, verification, protection, and safeguarding of customers' or external providers' property provided for use or incorporation into products and services.

SLE should report to the customer or external provider when their property is incorrectly used, lost, damaged, or otherwise found to be unsuitable for use. Customers' property can include material, components, tools and equipment, customer premises, intellectual property, and personal data.

External provider property may include material, production equipment, tooling, measuring and test equipment, facilities, transport vehicles, returnable packaging, intellectual property such as drawings, specifications or proprietary information, product returned for servicing under warranty, product sent for outsourced work, etc.

Performance indicators to measure the effectiveness of processes that control customer property may include reduction in identification errors and omissions, loss due to damage or unsuitability, scrap, rejects, etc., as well as increased customer property turnover rates.

#### 5.4 *Preservation*

SLE should ensure the preservation of process outputs during production and service provision, to the extent necessary to maintain conformity to requirements. Preservation can include identification, handling, packaging, storage, transmission or transportation, and protection.

All materials, work in progress, finished product, supplies, customer provided materials or product, product sent for outsourced work, etc., are subject to risk of being damaged, lost, misused, misplaced, stolen, become unsuitable, perishable or obsolete i.e. past shelf life for use. This could occur during receipt, handling, storage, use in production, and transportation to the customer, etc.

These occurrences could be: controlled using identification, status and traceability indicators, stock rotation methods such as first-in-first-out (FIFO), just in time, tracking shelf life, special controls for restricted access, handling and storage of hazardous materials, climate and environment, maintenance procedures, bar codes, training, use of special equipment for handling, condition reports, etc. These controls may be included as needed product realization processes through your product quality plans, work instructions and other specific documentation. Many of the controls needed for Identification and traceability apply to preservation of product.

Performance indicators to measure the effectiveness of processes that control preservation of product may include reduction in obsolete and spoils materials an product (e.g., fresh produce, fruits, or frozen foods), identification errors and omissions, rejects, waste, scrap, etc., and increase in inventory turnover and material/product availability, and product safety.

#### 5.5 *Post-delivery activities*

SLE should meet requirements, as applicable, for post-delivery activities associated with products and services.

In determining the extent of post-delivery activities that are required SLE should consider risks associated with products and services; customer feedback; legal requirements; nature, use, and intended lifetime of products and services; Post-delivery activities can include actions under warranty provisions, contractual obligations (such as maintenance services) and supplementary services (such as recycling or final disposal).

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Post-delivery activities mean based on customer agreement or other agreement, SLE may be responsible for providing support for their product or services after delivery. This could include technical support, routine maintenance or total recall, recycling, reusable packaging, returnable containers, etc.

The extent of post-delivery activities will depend on:

- Statutory and regulatory requirements: If statutory or regulatory requirements dictate post-delivery activities or warranties, they must be addressed
- The potential unexpected consequences associated with its products and services: The organization must consider potential consequences, and how they intend to respond, the scope of their reaction plan, etc.
- The nature use and intended lifetime of its products and services: This is very commonly stated in the organization's return policy or statement of liability. If there are no warranties (or post-delivery activities) offered, expressed or implied, SLE must clearly state them.
- Customer requirements: If the customer requires post-delivery, support, warranty, protection through delivery and receipt, etc., the post-delivery activities should be clearly described.
- Customer feedback: Customer feedback should be considered when determining the scope of post-delivery activities. This also implies that the scope of those post-delivery activities may change over time in response to customer feedback.

#### 5.6 Control of changes

SLE should review and control changes for production or service provision to extent necessary to ensure continuing conformity with requirements. The organization should retain documented information describing results of review of changes, personnel authorizing change, and any necessary actions arising from review.

SLE should be aware that changes which are not clearly communicated will create confusion. Likewise, changes which have not been adequately reviewed and vetted may be implemented and result in an undesired outcome. For their nature changes, in general, create instability and a robust change management process is critical to ensure changes are fully reviewed, approved, communicated, understood and validated when they are implemented.

SLE records should describe the effectiveness of changes, identify the personnel authorising the change, and any necessary actions arising from review that it has to be maintained.

## 6. Release of products and services

SLE has implement procedures to verify its product and service requirements met customer requirements. SLE keeps and retains evidence of conformity with the customer's acceptance criteria.

SLE has the policy that its products and services are not released to the customer until its control procedures and planned arrangements for verification of conformity have been satisfactorily completed unless otherwise approved by a relevant authority and, as applicable, by customer.

Consequently, SLE retains documented information for evidence and traceability to the person(s) authorising release of products and services for delivery to the customer. SLE identifies monitors and measures its customers' product/service specifications to verify conformity to their requirements. Product specifications may be dimensional, functional, performance, reliability, durability, maintainability, life, cost, etc. These requirements may be supplied by the customer, or SLE standards and/or industry sources.



These conformity requirements including methodologies, sample size, acceptance criteria and traceability needed for each product will be documented in SLE projects' quality plan.

## 7. Control of nonconforming outputs

SLE control of nonconforming outputs applies to processes, products and services that do not conform to customer requirements, applicable regulatory requirements or SLE standards. SLE recognises that nonconformities may relate to suppliers and outsourced work, and/or SLE activities or product shipped to customers.

SLE have controls and responsibilities to identify, contain (i.e. prevent further processing or use), keep records of the nature and other details of the nonconformity, notify appropriate personnel and customer, where appropriate, evaluate what action needs to be timely taken, determine policies, obtain customer concessions, rework and re-verification, establish performance indicators to measure the effectiveness of the control of nonconformance process, etc.

SLE has the policy that any product or material found with no identification or its quality status is not known, should be treated as nonconforming product and controlled accordingly. If SLE finds that a nonconforming product has been shipped, without a customer concession/acceptance, SLE must take appropriate action to reduce the immediate and consequential effect of the nonconformity.

Depending on the seriousness of the nonconformity, SLE might consider taking action to eliminate the nonconformity as well as corrective action to eliminate the cause(s) of the nonconformity. In specific circumstances, It might be appropriate to notify the customer and resolve the situation to their satisfaction. SLE need to be aware of any reporting requirements imposed by regulatory bodies and comply with them.

A written concession/acceptance authorization should allow SLE to ship nonconforming product, under controlled conditions. A deviation authorization allows you to manufacture product different from the original specification, under controlled conditions.

All product realization processes must show the interaction with SLE process for nonconforming product.

SLE performance indicators to measure the effectiveness of control of nonconforming product may include reduction in cycle time to evaluate, report and dispose of nonconforming product, reduced errors in preventing unintended use or delivery, improved alternate use of nonconforming product and cost recovery, etc.

## 8. Emergency preparedness and response

SLE Environment & Sustainability Management Plan – SLE M004 and SLE Emergency Management Plan – SLE M003 provide guidelines on how to prepare and respond to emergency situations.

These management plans address the following:

- Prepare to respond by planning actions to prevent or mitigate adverse safety and environmental impacts from emergency situations;
- Respond to emergency situations;
- Take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and its potential impacts;

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- Periodically test the planned response actions where practical;
- At least once per year, a site evacuation drill must be done to review procedures and have staff aware on their roles;
- Periodically review and revise the process(es) and planned response actions, in particular after the occurrence of emergency situations or tests;
- Provide relevant information and training about emergency preparedness, as appropriate, to staff and relevant interested parties.

## 9. Chain of Responsibility (CoR)

SLE operations CoR is determined by its functional structure as showed in QES F004. The main SLE's activities related to CoR compliance are consignments, packing and loading and/or receiving of goods.

To ensure that SLE's CoR reporting is effective, there are three areas to be considered:

**1. *The CoR is directed at safety, not business performance***

SLE's CoR compliance reporting should primarily concern about incidents, not dollars.

**2. *SLE must avoid CoR breaches***

As EOs are under a duty to exercise due diligence to avoid CoR breaches. CoR compliance reporting that is limited to information on breaches and remedial action following CoR breaches only goes halfway to discharging this duty.

Ideally, CoR compliance reporting should also be used to forecast non-compliance trends, so that compliance measures or further information, supervision and training can be put in place to prevent breaches before they occur.

**3. *CoR compliance reporting should focus on the bad, not the good***

CoR issues must generate a PIR which should be highlighted in SLE compliance reporting. CoR compliance reporting should mainly be exception or non-conformance based, to focus attention potential or actual compliance problems.

## SLE-0090 Performance Evaluation

This system element defines the processes by which the R-QES IMS is measured, analysed, reviewed and improved for its adequacy, efficiency and development. Consequently, it defines the use and control of general R-QES IMS documentation and records, including but not limited to measures to ensure their controlled generation, review and approval, distribution and amendment.

This system element defines SLE's actions and initiatives to address the question: 'is the integrated management system suitable, adequate and effective?' consequently determines what, how, and when things are to be monitored, measured, analysed and evaluated. In addition, this procedure defines the process by which the various sources of non-conformances are controlled, including the corrective action required to fix the non-conformance and any further corrective action which may be needed to prevent its recurrence. It also defines the process for undertaking preventative action.

### 1. Monitoring, measurement, analysis and evaluation

SLE shall determine what needs to be monitored and measured. The methods chosen for monitoring, measuring, analysis, and evaluation have to ensure valid results; with a greater

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emphasis on producing comparable and reproducible results than previously. In addition, SLE should determine when the monitoring and measuring shall be performed, and when the results will be analysed and evaluated.

The frequency of monitoring may vary depending on the risk and reliability of product and processes. The results of monitoring should be recorded by identifying and documenting all processes addressing the question: 'is the integrated management system suitable, adequate and effective?'

### 1.1 *Customer satisfaction*

SLE mission is to provide an excellent standard of services for our customers and community in accordance with our SLE objectives creating a continuous improvement culture.

Customer satisfaction information is the basis for SLE's Customer Relationship Management (CRM) strategy and it can be used to:

- Improve service quality and productivity;
- Minimise customer issues
- Refine the service concept
- Delegate responsibility within the organisation; and
- Motivate and reward responsible staff

As part of this CRM strategy, SLE has implemented and maintains a Customer Communication Program, which reflects the growing importance that SLE is placing on customer perceptions of SLE products and services.

Customer satisfaction is an important metric for SLE's QES IMS as it has a structured approach to analysing and evaluating all the information.

Feedback to SLE from customers will determine whether or not SLE has met their specified and perceived requirements. Customer requirements may relate to the design, manufacture, delivery, servicing and support of products and services, communication and financial requirements, etc. SLE must have the appropriate controls to identify and meet these requirements.

### 1.2 *Workshop/Site Inspections*

It is a planned event in which the workplace is inspected to identify potential hazards. It is also the best way of proactively identifying hazards before they have the ability to cause an injury.

Any competent staff can do a workplace inspection. Ideally though, an inspection would involve an experienced person from the area, a Safety and Health Representative or Safety Officer and the supervisor of the area. At least one of the team should be independent of the specific area.

To perform SLE workshop/site inspections use the checklist QES F016 to assist with the identification of hazards. Once hazards are identified, corrective measurements are implemented to eliminate them or minimise them ensuring that they are controlled.

### 1.3 *Analysis and evaluation*

SLE decisions shall be based on analysis of data obtained from measurements and information collected as described in the Risk Quality Environment and Safety Management System elements, procedures and work instructions.

In this context SLE may use:

- valid analysis methods
- appropriate statistical techniques, and

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- making decisions and taking actions as balanced with experience and intuition; based on market/industry performance and valuations and/or results of logical analyses.

The results of these analyses can be used to determine:

- trends,
- customer satisfaction,
- effectiveness and efficiency of SLE business processes,
- supplier contribution,
- success of SLE performance improvement objectives,
- economics of quality, financial and market-related performance,
- benchmarking Starlight Engineering Products and Services, and
- measure competitiveness

#### 1.4 *Evaluation of compliance*

In terms of Safety and Environment standards there is legislation that SLE management systems require being complaint as it is referenced in all QES system elements section 4.0.

To evaluate compliance SLE has integrated and harmonised different methodologies to cross-reference and measure SLE performance. These methodologies are:

**Audits** – internal audits are designed to ensure SLE is compliant with Australian Legislation and QES IMS requirements.

**Inspections** – SLE Workshop/Site inspections have elements of evaluating compliance to the Australian Legislation and QES Australian Standards.

**Product records** – SLE has policies and procedures in place to manage the organisation compliance requirements during its product manufacturing and/or service delivery. These records are also part of SLE's product identification and traceability.

**Management review** – SLE uses the management review meetings to evaluate the QES IMS requirements and compliance to the relevant Australian legislation applicable to the business and make a statement of compliance in their minutes.

## 2. **Internal audits**

This procedure defines the process of Internal Quality Audits. It establishes an independent procedure for verification of the effectiveness of the Risk Quality Management System which is integrated to the company's Work Health & Safety and Environment management systems.

To measure and monitor this integration, Workshop/Site(s) Safety inspections are carried out when management consider necessary and regularly as part of the company scheduled Internal Quality Audits.

This procedure shall cover the entire internal audit process including the planning, scheduling, coordinating, performing, reporting and follow up activities.

### Process Improvement Report (PIR)

When the auditor is satisfied that the implemented corrective action has been effective and/or when re-inspection reveals conformance, the PIR and PIR Log shall be closed out. These closed out PIR's then become the completed originals to be kept by the QES coordinator.

To ensure PIR's are completed, the QES coordinator shall file uncompleted audit PIR's separate from completed audit PIR's.

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### 3. Management review

The SLE Managing Director shall conduct the Management Review of the R-QES IMS. Under delegation of SLE's Managing Director the R-QES Coordinator might conduct the Management Review Meetings.

#### 3.1 Non-conformances and/or Area Of Concern (AOC)

Corrective actions are implemented in response to customer complaints, undesired levels of internal nonconformity, nonconformities identified during an internal audit or adverse or unstable trends in product and process monitoring.

Corrective action is a reaction to any of the cause/non-conformance mentioned above and can be divided in two phases of action:

- 1) Identification of root cause: using QES management tools such as risk assessments, job safety analysis and/ or cause and effects analysis.
- 2) Taking necessary actions: The effectiveness of the action taken has to be verified periodically through a systematic approach of Plan-Do-Check-Act cycle and monitored during internal audits & management review meetings.

The Areas Of Concern can be identified by internal reviews such as workshop / site inspections and audits. Their identification provides with the opportunity to timely eliminate of the causes of a problem, thus preventing their recurrence. AOC is also a term used by regulatory bodies to refer to environmentally sensitive or damaged areas.

Corrective action required as a result of the meeting shall be detailed in the minutes of the meeting. Corrective action may include the following:

- a full or partial audit of the R-QES Management System to ascertain the extent of a deficiency; or
- revisions to the Policy Manual or R-QES Procedures; or
- training of personnel

#### 3.2 Preventive and/or Opportunity For Improvement (OFI)

Preventive action is prediction of problem and trying to avoid the occurrence through self-initiated actions and analysis related with processes/products.

When preventative action is identified as part of the management review process, it shall be executed in accordance with the relevant business process or the integrated QES Management System procedures.

Preventative action is pro-active action taken before a non-conformance occurs to prevent its occurrence. Risk Assessments such as Plant Safety Analysis and general Risk Assessments are part of SLE preventive action initiatives. When any SLE staff considers that preventative action is possible, the OIC shall provide details to the QES coordinator.

When the R-QES coordinator is satisfied that the requested preventative action has been taken verifying the effectiveness of actions, the PIR and PIR's Log shall be closed out. The closed PIRs will be officially notified in the QES Management Review meetings and recorded in their minutes.





## SLE-0100 Innovation

This system element defines SLE's strategies and initiatives to sustain a continual improvement culture under a learning organisation philosophy. Lessons learnt are part of the enrichment of the organisation knowledge and create opportunities for improvement.

### 1. Overview

SLE uses the term "improvement system" to mean the approaches, methodologies, tools and technologies that uses to bring about improvements in how the organization operates. These are management approaches for isolating issues and finding solutions, and they are often the catalyst for specific changes to technologies, processes, job roles and/or adaptation to SLE's management structures.

The components of a systemic and humane approach for improving an organization that makes a difference to the customer and provides a lasting effect are:

1. how a product or service is delivered,
2. the product or service design, and
3. a management system to enable improvements.

SLE's systemic approach to improvement is created to support and enhance process improvement, product improvement, and integrated management practices improvement to improve the organization as a whole towards the achievement of the company objectives.

SLE's operational areas of its integrated management system require the awareness of how its actions impact other groups and the entire system. Each group must investigate to understand how their actions will benefit the whole and identify the dangers of how their actions introduce risks to the whole.

SLE recognises that people are not against change, they are against being changed. Consequently, SLE staff need to understand the need for change from their perspective.

Only through cooperation and collaboration, will collective learning take place. Eventually, production, product design, and management practices will need to work together to achieve SLE's objectives.

Below is a simple breakdown of the change elements for the change, "implementing a new improvement system".

Change Elements	Questions to consider
Awareness	Awareness of the need for <b>the improvement system</b> Why is the improvement system needed? What are the risks of not using this improvement system? Why is this improvement system being implemented now? What is the general nature of this change?



Change Elements	Questions to consider
<b>Desire</b>	Desire to participate and support <b>the improvement system</b> What are the organizational drivers causing us to bring this new improvement system into the organization? What are the motivators for getting involved in improvement programs?
<b>Knowledge</b>	Knowledge on how to use <b>the improvement system</b> What will be my role in using the new improvement system? What do I need to know to be successful using the new improvement system? When will I be trained on how the new improvement system works?
<b>Ability</b>	Ability to implement the skills and behaviors required by <b>the improvement system</b> What exactly will I be doing differently as a result of the new system? When will I have a chance to practice? Where do I go for support and assistance to be successful as part of this new system?
<b>Reinforcement</b>	Reinforcement to sustain <b>the improvement system</b> How do I know the organization is committed to using the new improvement system? Are senior leaders really committed to making this successful? Will this new approach be discarded next month?

## 2. Nonconformity and corrective action

Corrective actions are taken to eliminate the cause of a detected nonconformity to prevent recurrence, whereas preventive action is action taken to eliminate the cause of a potential nonconformity or other undesirable situation, to prevent occurrence.

SLE corrective action process is designed to address the following control requirements:

- Identify detected nonconformities that relate to SLE products, QES IMS processes, resources, suppliers and outsourced work, product shipped to customers, customer complaints, cost of quality reports, and things gone wrong reports.
- Define your process for identifying nonconformities and consider using appropriate problem-solving tools to determine the underlying root cause(s) of the nonconformity.
- Problem-solving tools may include analysis of failure mode, capability studies, correlation diagrams, data collection, fishbone diagram (Ishikawa diagram), histograms, Pareto analysis, probability charts, stratification of data, graphic representations, etc. Ensure that personnel applying these tools are competent and trained.
- Actions taken to eliminate the cause of nonconformity must flow from your problem-solving activity. Actions may involve changes to product, process, resources, documentation, controls, etc. or any combination of these. Conduct follow-up tests to determine whether these actions have indeed eliminated the cause(s) of the nonconformity and prevented recurrence. You must keep appropriate records of these actions and follow-up activities. You must monitor your corrective action records on an ongoing basis, for any recurrence of the nonconformity you took corrective action on.



### 3. Continual improvement

SLE defines continual improvement as a recurring activity to increase the ability to fulfill the company objectives and its compliance requirements. This 'ability to fulfill requirements' refers to both conforming as well as nonconforming products and/or processes.

Conforming processes can be further improved, and nonconforming processes must be improved by taking corrective action to prevent recurrence. Recurring activity refers to the QES IMS improvements include, audit results, results of analysis and evaluation, and the outputs from management review, Toolbox meetings, etc. SLE continual improvement approach is bottom-up and customer driven process. The use of continual improvement tools includes:

**Audit Results** – Results of product, process and QES management system audits usually provide many opportunities to improve QES MS effectiveness and efficiency. Opportunities may relate to communications, information systems, processes, controls, use of resources, technology, etc. SLE's QES coordinator must report these opportunities to top management as included as part of the management review agenda.

**Other Audits/Safety Inspections** – Besides product, process and QES MS audits, SLE shall conduct other reviews in the areas of financial, health and safety, environmental, technology, product profitability, social responsibility, information and communication systems audits. SLE QES IMS tools that are often used to continually improve are: capability studies, risk analysis, supplier evaluation, test and measurement technology, overall equipment effectiveness, analysis of motion/ergonomics and benchmarking. Performance indicators to measure the effectiveness of the continual improvement process may include quality objectives being met sooner than planned, achieving and exceeding business and quality objectives, improved efficiency in use of resources, cost reduction, improved product quality, increase work safe level and achieving environmental targets.