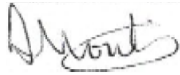



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AccessTec QHSE Manual

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1. Purpose

This Manual describes the organisation, the structure and the activities associated with the Quality, Health, Safety and Environment Integrated Management System, its purpose being to transmit confidence to the clients of AccessTec, as to the fulfillment of the contractual requirements and provisions. These activities comply with the requirements set out in the standard ISO 9001: 2015, ISO 14001:2015 and ISO 45001:2018. AccessTec are currently working towards achieving these standards.

2. Definitions

Activity: The smallest identifiable and essential piece of a job that serves as a unit of work, and as a means of differentiating between the various components of a project.

Interested Party: anyone who can affect, be affected by, or believe that they are affected by a decision or activity relevant to the QAP.

Process: set of interrelated or interacting activities that use inputs to deliver an intended result.

Project: an activity or series of activities contemplated, devised, and planned, for fulfilling a documented agreement. A project is temporary in that it has a defined beginning and end in time, and therefore defined scope and resources. Projects may be a single activity, completed in a few hours (commonly referred to as a Job) or may last several years (such as an evergreen project).

Quality: degree to which a set of inherent characteristics fulfills requirements.

Quality Assurance (QA): the planned and systematic actions necessary to provide adequate confidence that a service is performed satisfactorily.

QHSE Assurance Program: The overall program or management system established to assign responsibilities and authorities, define policies and requirements, and provide for the performance and assessment of work.

Requirement: need or expectation that is stated, generally implied or obligatory.

Service: Activities performed by one party for another, based on a documented agreement.

3. Reference Documents

ISO 9001:2015, Quality Management Systems: Requirements.

ISO 14001:2015, Environmental Management Systems: Requirements.

ISO 45001:2018, Occupational health and safety (OH&S) management system

4. Responsibility

The responsibility for writing, revising, diffusing and maintaining the original and successive revisions of this Manual rests with the person in charge of the Quality, Health, Safety and Environment Service of AccessTec.

The approval of the Quality, Health, Safety and Environment (QHSE) Manual is a Director of AccessTec.

5. Organisation

AccessTec specialises in the provision of work at height services including in industrial work environments. This includes but is not limited to:

- Wind turbine blade inspection, repair and retrofits. Work is at height (access via; rope access, Mobile Elevated Work Platform (MEWP))
- Wind turbine service tasks at height
- General rope access engineering services

5.1 Needs and Expectations of Interested Parties

Due to their effect or potential effect on the organisation's ability to consistently provide services that meet customer and applicable statutory and regulatory requirements, AccessTec has identified and documented:

- a. the interested parties relevant to the quality, health, safety and environmental assurance program (interested parties, their needs and expectations are identified in the table below);
- b. the requirements of interested parties that are relevant to the quality health, safety and environmental assurance program.

Interested Party	Needs and expectations
Customers	Safety, on-time delivery (turnaround time); service conformity.
Share Holders	Sustained profitability; transparency.
Employees	Suitable compensation; appropriate work environment; job security; recognition.
Suppliers	Clearly documented product/service requirement; fair and timely payment; loyalty.
Society	Safety; environmental protection; ethical behavior; compliance with statutory and regulatory requirements.
Health & Safety Executive (HSE)	Compliance with all UK HSE Laws and Regulations. Reporting under the RIDDOR regulations.
Environment Agency (EA)	Compliance with all UK Environmental Laws and Regulations
Scottish Environmental Protection Agency (SEPA)	Compliance with all Scottish Environmental Laws and Regulations
NQA	Independent certification body who oversee the certification programme and compliance regarding ISO:9001, ISO:14001, ISO 45001

5.2 Scope of the Quality, health, safety and environmental Assurance Program

Wind turbine blade repair and inspection services.

Industrial services including minor fabric maintenance. Working at height training to international and industry standards at certified training facilities.

AccessTec is contracted to perform industrial services and does not manufacture products that utilize the Design and Servicing functions as defined by the reference documents (Section 2.0). Therefore, these requirements are not applicable to the scope of this quality assurance program.

5.3 Quality Assurance Program and its Processes

5.3.1 Process Identification

AccessTec has adopted a process approach for its quality assurance program. By identifying the top-level processes within the company, and then managing each, nonconformities and risks are identified in real time, by actions taken within each of the top-level processes. This reduces the potential for service nonconformity discovered during final review or after delivery.

Note: Not all activities are considered “processes” – the term “process” in this context indicates the activity has been elevated to a higher level of control and management oversight. The controls indicated herein are applicable only to the top-level processes identified.

Monitoring and control of top level processes ensures effective implementation and control of all subordinate activities or sub-processes.

5.3.2 Process Definitions

AccessTec maintains documented information defining its processes. This documentation includes:

1. applicable inputs and outputs
2. sequence and interactions
3. responsibilities and authorities
4. applicable risks
5. resources needed
6. criteria and methods employed to ensure the effectiveness of the process
7. identification of processes' intended result
8. measurable objective and the process for gathering metrics data

5.3.3 Supporting Activities

Processes are supported by other activities and sub-processes. Examples of supporting activities, critical to the IMSM are:

1. Control of Documents and Records;
2. Control of Nonconforming Items;
3. Shipping, Receiving and Handling;
4. Preservation.

5.3.4 Process Controls and Objectives

AccessTec gathers metrics data that measures each process. This data is then analyzed to set goals and make adjustments for the purposes of long-term continual improvement. The specific quality objectives for each process are documented.

Metrics, along with the processes' status, relative to the set goals for each objective, are recorded and provided to management for review on a periodic basis. When a process does not meet a goal, or a problem is encountered with a process, Corrective Action is implemented to analyse and resolve the issue. In addition, opportunities for improvement are sought and implemented, for the identified processes.

5.3.5 Outsourced Processes

Any process performed by a third party is considered an “outsourced process” and is controlled, as well. The outsourced processes, and the control methods implemented for each, are identified and documented in the same manner as internal processes.

The type and extent of control to be applied to the outsourced process takes into consideration:

1. the potential impact of the outsourced process on the company's capability to provide product that conforms to requirements,
2. the degree to which the control for the process is shared between parties,
3. the capability of achieving the necessary control through the purchasing contract requirements.

6 Leadership

6.1 Leadership & Commitment

6.1.1 General

Executive Management provides evidence of its leadership and commitment to the development and implementation of the QHSE assurance program and continually improving its effectiveness by:

1. taking accountability of the effectiveness of the QHSE assurance program;
2. ensuring that the QHSE policy and QHSE objectives are established for the QHSE assurance program and are compatible with the strategic direction and the context of the organisation;
3. ensuring the integration of the QHSE assurance program requirements into the organisation's other business processes, as deemed appropriate (see note);
4. promoting awareness of the process approach;
5. ensuring that the resources needed for the QHSE assurance program are available;
6. communicating the importance of effective QHSE management and of conforming to the QHSE assurance program requirements;
7. ensuring that the QHSE assurance program achieves its intended results;
8. engaging, directing and supporting persons to contribute to the effectiveness of the QHSE assurance program;
9. promoting continual improvement;
10. supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

Note: Business Processes, such as accounting and information technologies, are out of scope of the QHSE assurance program.

6.1.2 Customer Focus

AccessTec adopts a customer-first approach which ensures that customer needs and expectations are determined, converted into requirements and are met with the aim of enhancing customer satisfaction.

This is accomplished by assuring:

1. customer and applicable statutory and regulatory requirements are determined, understood and consistently met;
2. the risks and opportunities that can affect conformity of products and services and the ability to enhance customer satisfaction are determined and addressed;
3. the focus on enhancing customer satisfaction is maintained.

6.2 Roles, Responsibilities and Authorities

Our organisational structure is defined in section 6.3 The Organisation chart shows the interrelation of personnel within AccessTec, whilst job descriptions define the responsibilities and authorities of each role.

Members of Top management are ultimately responsible for the quality of AccessTec's products and services since they control the resources, systems and processes by which conforming work is accomplished. Top management are responsible for business planning, development and the communication of our policies, QHSE management system planning, the establishment and deployment of objectives, the provision of resources needed to implement and improve the quality management system and for undertaking management reviews. Top management has assigned the responsibility and authority to the management teams and departments to:

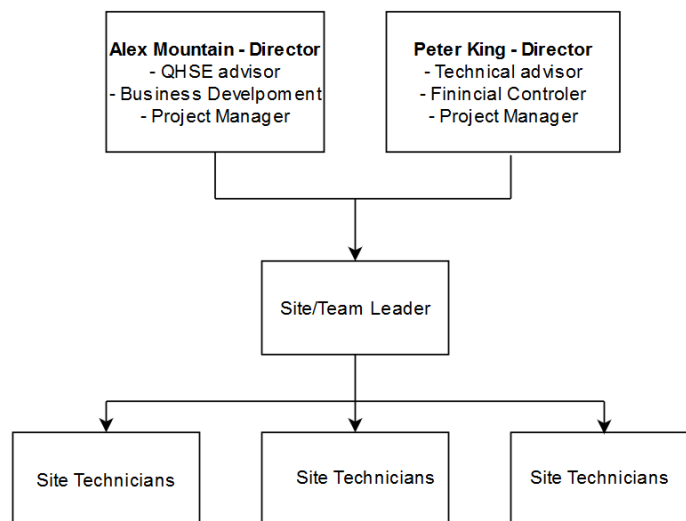
1. Ensure that IMSM processes are delivering their intended outcomes;
2. Report on the operation of the IMSM and identifying any opportunities;
3. Ensure that improvement is taking place;
4. Ensure that customer focus is promoted throughout the organization;
5. Ensure that whenever changes to the IMSM are planned and implemented;
6. Ensure the integrity of the system is maintained during changes;
7. Ensure that responsibilities and authorities relating to the IMSM are communicated and understood.

All managers demonstrate their commitment to the development and improvement of the QHSE management system through the provision of necessary resources, through their involvement in the internal audit process and through their proactive involvement in continual improvement activities. Emphasis is placed on improving both the effectiveness and efficiency of key system processes.

All managers are responsible for execution of the business plan and the implementation of the policies, processes and systems described in this manual. All managers are responsible for planning and controlling the management system processes within their area of responsibility, including the establishment and deployment of operational level objectives and the provision of resources needed to implement and improve these processes.

All employees are responsible for the quality of their work and implementation of the policies and procedures applicable to processes they perform. Employees are motivated and empowered to Identify and report any known or potential problems and to recommend related solutions to aid the corrective and preventive action process.

6.3 Organisation Chart



7 QHSE Assurance program

7.1

AccessTec has established and documented a QHSE assurance program. This QHSE Manual establishes corporate policies and responsibilities regarding Quality, Health, Safety and Environment (QHSE) and is the foundation for all activities concerning QHSE.

The IMSM is implemented and maintained to assure service Quality, Health, Safety and Environment (QHSE) by:

1. providing assurance that processes achieve the intended result;
2. enhancing desirable effects;
3. preventing, or reducing, undesired effects; and,
4. achieving improvement.

7.2 QHSE Objectives

As part of the adoption of the process approach, AccessTec utilizes its process objectives, as discussed in 5.3 above, as the main QHSE objectives for the IMSM. These include overall service-related quality objectives; additional service-related quality objectives may be defined in work instructions or customer requirements.

The process objectives have been developed in consideration that they:

1. be consistent with the QHSE policy;
2. be measurable;
3. be compared to applicable requirements;
4. be relevant to conformity of products and services and to enhancement of customer satisfaction;
5. be monitored;
6. be communicated;
7. be updated as appropriate.

7.3 Planning of Changes

When the organization determines the need for changes to the QHSE assurance program, the changes are carried out in a planned manner. The following is considered:

1. the purpose of the changes and their potential consequences;
2. the integrity of the QHSE assurance program;
3. the availability of resources;
4. the allocation or reallocation of responsibilities and authorities.

7.4 Induction

Personnel performing or managing activities affecting quality receive induction in their job responsibilities and authority that includes general criteria, technical objectives, requirements of applicable codes and standards, regulatory commitments, company procedures, and QHSE assurance program requirements.

8 Support

8.1 Resources

8.1.1 General

AccessTec management determines and provides the resources necessary:

1. to implement and maintain the QHSE assurance program and continually improve its effectiveness;
2. to enhance customer satisfaction by meeting and exceeding customer requirements.

Resource allocation is accomplished with consideration of the capability and constraints on existing internal resources, as well as needs related to customer expectations.

Resources and resource allocation are assessed during management review.

8.1.2 Human Resources

Training

Management ensures personnel who perform, verify, or manage activities affecting quality, receive proper training. Training is provided, as needed, to achieve initial proficiency, maintain proficiency, and adapt to changes in technology, methods, or job responsibilities. The extent of the training is proportionate with the scope, complexity and nature of the activity and the education, experience and proficiency of the person.

8.1.3 Work Environment

AccessTec manages the work environment needed to achieve conformity to quality requirements. Factors that may affect quality include temperature, humidity, lighting, cleanliness, protection from electrostatic discharge, etc.

NOTE: Social, psychological and safety aspects of the work environment are managed through activities outside of the scope of the quality assurance program. Only work environment aspects which can directly affect process efficiency or product and service quality are managed through the quality assurance program.

8.1.4 Organizational Knowledge

AccessTec determines the knowledge necessary for the operation of its processes and to achieve service conformity. This knowledge shall be maintained and made available to the extent necessary.

This may include knowledge and information obtained from internal and external sources.

8.2 Competence

Individuals performing work affecting product quality are competent based on appropriate education, training, skills and experience.

NOTE: This QHSE assurance program does not include other aspects of Human Resources management, such as payroll, benefits, insurance, labor relations or disciplinary actions.

8.3 Awareness

Training and subsequent communication ensure that staff are aware of:

1. the QHSE policy;
2. relevant QHSE objectives;
3. their contribution to the effectiveness of the QHSE assurance program, including the benefits of improved performance;

4. the implications of not conforming with the QHSE assurance program requirements

8.4 Communication

AccessTec ensures internal communication takes place regarding the effectiveness of the QHSE assurance program. Internal communication methods include:

1. internal audits;
2. management review;
3. QHSE notifications;
4. monthly QHSE updates;
5. Corporate Server;
6. internal emails.
7. Documented Information

8.5 Control of Documents

AccessTec implements and maintains a procedure that details requirements for document control. The implementing QHSE assurance procedures identify controls needed:

1. to approve documents for adequacy prior to issue;
2. to review and update as necessary and re-approve documents;
3. to ensure that changes and the current revision status of documents are identified;
4. to ensure that relevant versions of applicable documents are available at points of use;
5. to ensure that documents remain legible and readily identifiable;
6. to ensure that documents of external origin are identified, and their distribution controlled;
7. to prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose.

8.6 QHSE Records

Records providing objective evidence of the quality of items or activities are maintained in accordance with established procedures. These procedures assure that the records are legible, maintained for established retention periods, stored in a manner protecting them from deterioration, retrievable and are identifiable to the item or activity to which they pertain.

9 Operation

9.1 Contract Review

Customer contracts are reviewed by the appropriate management, operational and quality assurance personnel in accordance with written procedures.

Prior to contract acceptance it is reviewed by the appropriate personnel to ensure that:

1. the requirements are adequately defined and documented; where no written statement of requirements is available, or an order is received by verbal means, ensure that the order requirements are agreed to and documented before acceptance;
2. any conflicts between purchase orders, specifications and bid proposals are resolved;
3. adequate capability exists to meet contractual requirements;
4. possible risks are evaluated (e.g. schedule and lead time, new technology introduction);
5. procedures and/or work instructions are adequate to ensure acceptance criteria and deliverable data are defined.

Amendment(s) to a contract are reviewed by operational and quality assurance personnel. Records of amendments are maintained with the original contract record.

9.2 Project Planning

Service related activities are planned and documented prior to project commencement in accordance with written procedures. Planning results in the documented identification of methods and organizational responsibilities.

Planning is accomplished through:

1. determining the requirements for the products and services;
2. establishing criteria for the processes and the acceptance of products and services;
3. determining the resources needed to achieve conformity;
4. implementing control of the processes in accordance with the criteria;
5. determining, maintaining and retaining documented information to the extent necessary to have confidence that the processes have been carried out as planned and to demonstrate the conformity to their requirements.

Project planning with operational and quality assurance personnel is performed and documented prior to the start of work.

Project planning is documented on a Project file, although, complex long-term projects may require a more detailed Project Quality Plan. The need for a Project Quality Plan is determined during the project planning process.

9.3 Operational Control

Services are performed by qualified personnel using approved procedures in accordance with specified requirements.

Processes are controlled by instructions, procedures, checklists, project file or other appropriate means. Records are maintained as appropriate for these processes.

To control its services AccessTec considers, as applicable, the following:

1. the availability of documents or records that define the characteristics of the product or service as well as the results to be achieved;
2. the availability and use of suitable monitoring and measuring resources;
3. the implementation of monitoring and measurement activities;
4. the use of suitable infrastructure and environment;
5. the appointment of competent persons, including any required qualifications;
6. the validation and revalidation of special processes if applicable;
7. the implementation of actions to prevent human error;
8. the implementation of release, delivery and post-delivery activities.
- 9.

9.3.2 Special Processes

Special processes that control or verify quality, such as blade repair, shall be performed by qualified personnel using qualified procedures in accordance with specified requirements.

Special processes are controlled by instructions, procedures, drawings, checklists, project file, or other appropriate means. Special process instructions shall include or reference procedure, personnel, and equipment qualification requirements.

Conditions necessary for accomplishment of the process are included. These conditions include proper equipment, controlled parameters of the process, specified environment, and calibration requirements.

Inspection activities required to verify service conformance to specified requirements are planned and executed. Characteristics subject to inspection and inspection methods shall be specified. Inspection results shall be documented. Inspection for acceptance shall be performed by qualified persons other than those who performed or directly supervised the work being inspected.

9.3.3 Configuration Management

The project execution process and its configuration are controlled by the project file tracker. The project file tracker identifies the applicable revision status of the applicable specifications, procedures and techniques.

Implementing procedures for contract review and project execution, and related work instructions define the requirements for the management of the project execution process. Project planning includes the identification of the required controls at the configuration level, these controls are managed by operations management.

No customer drawings are controlled or retained. No change control is required to be managed. When required; configuration status accounting and audits are performed by the customer (One Piece Buy- Offs). Revisions of part numbers, drawings and batch numbers, heat numbers, serial numbers, etc. are flow down by the customer.

9.4 Control of Externally Provided Processes, Products and Services (Procurement)

AccessTec ensures that purchased products and services conform to specified purchase requirements. The type and extent of control applied to the supplier and the purchased products or services are dependent on its effect on the subsequent service.

AccessTec evaluates and selects suppliers based on their ability to supply products and services in accordance with the specified requirements. Criteria for selection, evaluation and re-evaluation are established.

Purchases are made via the release of formal purchase orders and/or contracts which clearly describe what is being purchased. Receipt inspection is used to verify conformance with the purchase order requirements and is performed in accordance with written procedures. Suppliers who fail to provide conforming products or services may be requested to conduct formal corrective action. Nonconforming products or services are adequately quarantined to prevent inadvertent installation, use or delivery.

These activities are further defined in the procurement procedure and receipt inspection procedure.

9.5 Identification, Handling, Storage, Shipping and Preservation

Handling, storage, packaging, shipping, and preservation of items is controlled to prevent damage or loss and to minimize deterioration. These activities are conducted in accordance with established contracts, work and inspection instructions, drawings, specifications, shipment instructions, or other pertinent documents or procedures specified for use in conducting the activity.

9.5.1 Customer Property

AccessTec exercises care with customer property while it is under our control or being used by AccessTec. Customer property provided for use or incorporation into the project's execution is identified, verified, protected and safeguarded. If any customer property is lost, damaged or otherwise found to be unsuitable for use, this is reported to the customer and records are maintained.

9.5.2 Identification and Traceability

Where appropriate, items in the control of AccessTec is identified by suitable means and is identified with respect to its status within the test process. Identification is maintained on the items or in documents traceable to the items, or in an alternate manner that assures that identification is established and maintained.

9.5.3 Preservation

Items used in the repair/inspection process are preserved to ensure conformity to customer specifications and applicable statutory and regulatory requirements. Preservation includes:

1. cleaning;
2. foreign object damage, prevention of (FOD);
3. special handling for sensitive items;
4. marking and labeling, including safety warnings;
5. shelf life control and stock rotation;
6. special handling for hazardous materials.
7. Control of Nonconforming Items

Items that do not conform to requirements are identified and controlled to prevent unintended use or delivery. The controls and related responsibilities and authorities for dealing with nonconforming items are defined in implementing procedures.

When nonconforming items are detected after delivery or its use initiated, appropriate action that is proportionate to effects, or potential effects, of the nonconformity is taken. When nonconforming items are corrected they are subject to re-verification to demonstrate conformity to the requirements. All nonconformance reports are evaluated for reportability.

10 Performance Evaluation

10.1 Monitoring, Measurement, Analysis and Evaluation

AccessTec has determined which aspects of its quality assurance program must be monitored and measured, as well as the methods to utilize and records to maintain, within this QHSE Manual and subordinate documentation.

Monitoring and measurement of the processes, as defined in section 5.3, assure that management evaluates the performance and effectiveness of the quality assurance program.

As one of the measurements of the performance of the quality assurance program, AccessTec monitors information relating to customer perception as to whether the organization has met customer requirements. The methods for obtaining and using this information include recording:

1. customer complaints;
2. nonconforming items;
3. repeat orders for product;
4. changing volume of orders for product;
5. trends in on-time delivery;
6. customer satisfaction surveys.

The corrective and preventive action system is used to develop and implement plans for customer satisfaction improvement that address deficiencies identified by these evaluations and assess the effectiveness of the results.

AccessTec analyzes and evaluates the data and information arising from monitoring and measurement in order to evaluate:

1. product and service conformity;
2. the degree of customer satisfaction;
3. the performance and effectiveness of the quality assurance program;
4. if planning has been implemented effectively;
5. the effectiveness of actions taken to address risks and opportunities;
6. the performance of external providers;
7. the need for improvements to the quality assurance program.

Statistical techniques used may be defined in appropriate documented procedures; in all cases, the methods are based on established standards or are otherwise determined to be statistically valid.

10.2 Internal Audit

Audits are performed to verify that performance criteria are met and to determine the effectiveness of the QHSE Assurance Program. These audits are performed at planned intervals in accordance with implementing procedures and/or checklists by personnel who do not have direct responsibility for performing the activities being audited.

The audit program is planned, taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits. The audit criteria, scope, frequency and methods are defined.

Selection of auditors and conduct of audits ensures objectivity and impartiality of the audit process. The audit personnel are selected based on their impartiality and required level of technical capability to perform audits. Representatives from various departments may be called upon for technical advice or audit assistance.

10.3 Management Review

Management reviews the QHSE assurance program, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. The review includes assessing opportunities for improvement, and the need for changes to the QHSE assurance program, including the QHSE Policy and QHSE objectives.

Management review frequency, agenda (inputs), outputs, required members, actions taken, and other review requirements are defined in the Management Review Procedure. Records from management reviews are maintained.

11 Improvement

11.1 General

AccessTec uses the QHSE assurance program to improve its processes and services. Such improvements aim to address the needs and expectations of customers as well as other interested parties, to the extent possible. Improvement shall be driven by an analysis of data related to:

1. service conformity;
2. the degree of customer satisfaction;

3. the performance and effectiveness of the quality assurance program;
4. the effectiveness of planning;
5. the effectiveness of actions taken to address risks and opportunities;
6. the performance of external providers;
7. other improvements to the quality assurance program.

11.2 Corrective Action

AccessTec promptly identifies and documents conditions adverse to QHSE. These conditions, also identified as non-conformities, are corrected as soon as practical. The implementation and documentation of the corrective and preventive action process is detailed in implementing procedures. This process is also used for complaints and appeals. This information is available to interested parties on request.

The actions taken to correct nonconformities are determined and implemented. Each nonconforming condition is evaluated and where the condition is determined to be significant, a root cause is determined, and action is taken to prevent reoccurrence.

Corrective actions are logged, categorized and reviewed to identify trends to be evaluated in the continuous improvement process

11.3 Improvement

AccessTec continues to improve the effectiveness of the quality assurance program using the quality policy, quality objectives, audit results, analysis of data, corrective actions and management review.