

Major Accident Prevention Policy

7 Steel UK is a leading low carbon recycled steel producer and a major supplier of reinforcement and structural steel to the construction industry. The Company is committed to continuous improvement in all areas of its business, to underpin its long-term strategy of sustainability, operational excellence and responsible growth.

7 Steel Manufacturing UK recognises that the nature of their operations has the potential to give rise to major accident hazards including losses of containment of dangerous substances that could lead to harm to people, the environment, and property. The Management Team, led by the Managing Director, are fully committed to preventing major accidents and mitigating their potential consequences should such an event occur. This commitment is delivered through the implementation and continual improvement of a Safety Management System that incorporates the active management of major accident hazards, informs decision-making and supports the highest standards of health, safety and environmental performance.

This Major Accident Prevention Policy (MAPP) is established and implemented in accordance with the Control of Major Accident Hazards (COMAH) Regulations, the Health and Safety at Work etc. Act 1974, and other applicable health, safety, and environmental legislation, and provides the framework through which major accident risks are managed throughout the lifecycle of the installation.

To achieve this, 7 Steel Manufacturing UK will:

- **Organisation and Personnel**

Allocate adequate human, financial, and physical resources, and establish clear roles, responsibilities and accountability for managing major accident hazards and supporting continuous improvement. Ensure personnel competence through appropriate education, training, and experience, and promote the active involvement of employees and contracted personnel whose activities may affect major accident risk.

- **Identification and Evaluation of Major Hazards**

Systematically identify and evaluate major hazards using competent personnel and define appropriate control measures for the prevention and mitigation of major accidents, ensuring risks are reduced to 'as low as reasonably practicable' (ALARP). This process will address both normal and abnormal operations and apply across the full life cycle of the installation, from project conception through to decommissioning. Relevant lessons learned from incidents, near misses, and external events will be taken into account.

- **Operational Control**

Develop, implement, and maintain procedures and systems of work that underpin the safe design, construction, operation, maintenance, and decommissioning of plant and equipment. Operational controls critical to major accident prevention will be clearly defined, readily available, communicated, and revised as necessary to ensure continued effectiveness.

- **Management of Change**

Methodically identify and manage any changes to plant, equipment, processes, materials, organisation, personnel, systems, procedures, design or external circumstances to ensure effective control of major accident hazards is maintained. This includes planned, temporary, and unplanned changes.

- **Planning for Emergencies**

Systematically identify foreseeable emergencies that could arise from the company's activities and develop emergency plans to respond to such scenarios, in conjunction with relevant stakeholders and external emergency services where appropriate. Emergency plans will be tested, reviewed, and updated at predetermined intervals. Relevant personnel will be identified and trained to fulfil key roles during an emergency.

- **Monitoring Performance**

Continuously monitor the effectiveness of the Safety Management System in achieving the objectives of the MAPP by reporting and tracking a range of proactive and reactive Key Performance Indicators relevant to major accident hazards. These will be compared against defined safety targets and objectives. Arrangements will be in place to report, appropriately investigate, and learn from major accidents, near misses, and non-compliances.

- **Audit and Review**

Arrange periodic audits to evaluate the effectiveness and suitability of the Safety Management System in delivering the MAPP. Subsequent corrective actions will be planned and implemented. The MAPP will be reviewed by senior management, alongside the overall safety policy and strategy, at least annually, or following significant change, a major accident, or a significant near miss, to drive continuous improvement.

Senior management is responsible for the implementation of this MAPP, which is communicated to all employees and relevant contractors, and made available to interested parties upon request or via the company website.



Carlos Rovira Caroz

7 Steel Manufacturing UK Managing Director