




Sterling Chemical Malta Ltd

PROCEDURE: CONTROL OF DOCUMENTS

REVISION HISTORY

Revision Date	Revision Number	Sections Affected	Change description

Procedure Number: MPA_4.4.5	Edited by: RSGA/RSGS	Control by RSGA	Approved by: Top Management Safety Manager
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1. PURPOSE

The organization is required to control documents, such as system procedures and work instructions, to ensure that current versions are distributed and obsolete versions are removed from the system. There is a requirement for a document control procedure that ensures documents are approved prior to use, are reviewed and updated as necessary, changes to versions are identified, that the current versions are available at points of use, that they are legible, identifiable, and that obsolete ones are so noted to avoid unintended use. It is acceptable to use documents of internal origin in the HSE SYSTEM, but those must be identified as being essential to the HSE and their distribution controlled. This procedure describes the control system for preparing, approving, distributing, revising and updating documents that are required under the HSE SYSTEM

2. SCOPE

This procedure applies to all documents established under the HSE SYSTEM of **STERLING CHEMICAL MALTA LTD**. For control of environmental records, see **MP_4.4.5 Control of Records**. The documents under the EMS include but are not limited to:

- EMS Manual
- Environmental, Health and Safety Procedures
- Environmental, Health and Safety Instructions
- EMS Forms, Checklists and Guidelines
- Objectives, Targets and Programmes
- Register of Environmental Aspects
- Registers of Legal and Other Requirements
- External documents including legislation, professional guides and code of practices, etc.

3. REFERENCE DOCUMENTS


Section 4.4.5
MP_4.4.5-B

EMS Manual
Control of Records

4. DEFINITIONS

For a correct reading and interpretation of this procedure are given the following definitions:

- | | | |
|---------------|---|---|
| RSGA | – | Environmental Management Representative |
| RSGS | – | Safety and Health Representative |
| HSE Committee | – | Health, Safety, Environmental Management System Committee |

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AD – Administration Department

Controlled Copy – controlled documents shall be posted on the company server for read-only access or the hard copy shall be stamped "CONTROLLED COPY" in red. Controlled copy shall be subject to automatic update when a new revision is released.

Uncontrolled Copy - uncontrolled document is a hard copy of the document that shall not bear the stamp "CONTROLLED COPY" in red. Uncontrolled copy shall not be subject to automatic update when a new revision is released. It is for reference only.

Master Copy – the original hard copy of the document that shall be approved and signed by authorized personnel.

5. RESPONSABILITY

5.1 Top Management and Safety Manager

The (Top Management) shall approve and sign all EMS documents, which include the Environmental Policy, EMS manual, environmental procedures and instructions, Objectives, Targets and Programmes, Register of Environmental Aspects and Registers of Legal and Other Requirements. In the absence of the (Top Management), the RSGA shall approve and sign the EMS documents. The safety manager shall approve and sign all HSE documents for security and Health parts and its absence

5.2 Environmental Management Representative and Safety/Health Representative


The RSGA shall work together with the HSE Committee to prepare and revise all HSE documents.

5.3 HSE Department

The HSE is responsible for the HSE document control system. The HSE shall ensure that only controlled and current copies of documents are used, and distribute the controlled HSE documents to relevant personnel whenever updated versions are available. The HSE shall also maintain and update the Master List of Documents.

5.4 Function / Departmental Manager

The Function / Departmental Manager shall review relevant EMS documents and procedures, ensure that their subordinates are familiar with the updated EMS documents related to them, and report any proposed changes to the EMS documents and forms to the EMS Committee.

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6. PROCEDURE

6.1 Labelling and Numbering System of EMS Documentation

Official documents required for the implementation of the Health, Environmental and Safety Management System of Sterling are following:

- General Documents
- Basic Documents
- Management Procedures
- Operating Instructions
- Forms/Check lists.
- Registers;
- Documents Management System Quality Assurance


6.1.1 To indicate the status of each document, and to prevent the use of obsolete or outdated documents, the following information shall be stated on each HSE document or procedure:

- Title (subject)
- Document number
- Revision number (which starts from 00,01,2,3.....)
- Date
- Sections affect and change description
- Document originator
- Document controller
- Approved person and his/her signature

The documents are listed in the basic document “Master list of HSE document” (MD_4.4.4) that is updated by RDOC and RSGS following the issue of new documents or revision.

6.1.2 The numbering system of HSE documentation is as follows :

Documento SGAS	Sigla di identificazione
Environmental Management System Manual	EMSM
Basic documents	D + reference section of ISO 14001 and 18001 + progressive code
Environmental Basic Documents	MDA + reference section ISO 14001 + progressive code
Health and Safety Basic Documents	MDS + reference section OH SAS 18001 + progressive code


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HSE Procedure	MP + reference section ISO 14001 and OH SAS 18001 + progressive code
Environmental Procedures	MPA + reference section ISO 14001 + progressive code
Health and Safety Procedures	MPS + reference section OH SAS 18001 + progressive code
Operative Instruction	MIO + reference section ISO 14001 and OH SAS 18001 + progressive code
Environmental Operative Instruction	MIOA + reference section ISO 14001 + progressive code
Health and Safety Operative Instruction	MIOS + reference section OH SAS 18001 + progressive code
HSE Forms and Check lists	MM + reference section ISO 14001 and OH SAS 18001 + progressive code
Environmental Form	MMA + reference section ISO 14001 + progressive code
Health and Safety Form	MMS + reference section OH SAS 18001 + progressive code
Environmental register	MRA+ reference section ISO 14001 + progressive code
Health and Safety register	RS+ reference section OH SAS 18001 + progressive code

6.2 Document Review and approval

All internal EMS documents shall be reviewed and approved by authorized personnel prior to release. This shall be carried out in accordance to the following

Document Type	Prepared/ Reviewed by	Approved by
EMS Manual	RDOC/RSGA	<i>Top Management</i>
Environmental Procedures	RDOC/RSGA	<i>Top Management</i>
Environmental Instructions	RDOC/RSGA	<i>Top Management</i>
Objectives, Targets and Programmes	RDOC/RSGA	<i>Top Management</i>
Register of Environmental Aspects	RDOC/RSGA	<i>Top Management</i>
Register of Legal and Other Requirements	RDOC/RSGA	<i>Top Management</i>
Forms / Checklists / Guidelines	HSE Committee / Function / Departmental Managers	EMR / Function / Departmental Managers
Health and Safety Procedures	RSGS	Safety Manager
Health and Safety Operative Instruction	RSGS	Safety manager
Health and Safety Form	RSGS	Safety Manager

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Health and Safety register	RSGS	Safety manager
HSE Procedure	HSE committee	<i>Top Management</i> /safety Manager
HSE Operative instruction	HSE committee	<i>Top Management</i> /safety Manager

The preparation of a new procedure, or operating instruction and forms is necessary to:

- New laws and not;
- Business needs to define schematically, structurally and operationally some sporadic activity or repeated consistently over time;
- On any objective evidence of need reported by RDOC / RSGA / RSGs and department heads


6.3 Distribution and Control of Controlled Documents

- 6.3.1** The original hard copies of controlled documents shall be signed by the authorised person, and maintained by the HSE office.
- 6.3.2** All controlled documents, and the Master List (MD_4.4.4) showing the documents and forms issued with the latest revision number and date shall be maintained and updated by the HSE. The HSE shall inform the most recent documentation status and announce the release of new versions of controlled documents to staff.
- 6.3.3** The HSE shall maintain document distribution records that record the number of copies and their recipients (a template of Document Distribution List is shown in MR_4.4.5-A). Hardcopies of controlled documents shall be stamped with “CONTROLLED COPY” in red and be subjected to update.

The documents after has been approved, its have been added to the Master list of the documentation, it is converted to PDF and placed in the archive WEB shared enterprise in the Documents folder of the system of environmental and safety management. Access to documents management system is guaranteed by the system Quickr for environment and security. In particular, each employee for information on procedures, operating instructions and other documents to be accessed at the following link <https://quickr.sterling.it> and follow the directions to have access to various folders EHS. For some documents relating to health and safety can be accessed through the system then estimated using the smart card provided to each employee

6.4 Revision of Documents

- 6.4.1** All HSE documents shall be constantly reviewed and revised as necessary by relevant personnel. Function / Departmental Managers shall report any proposed changes to the HSE.

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- 6.4.2** All revised controlled documents shall be reviewed and approved by the authorized person.
- 6.4.3** The HSE shall file the superseded Master Copy of the documents, marked with a red chop of “Obsolete Document”, in the Obsolete Document File for at least 3 years for reference and traceability.
- 6.4.4** All HSE documents shall be constantly when
- after each process of the review of the Environmental Management System implemented by senior management;
 - intervening factors change, interacting directly or indirectly with the Company, which produce significant environmental impacts or safety in the activities or services of the organization.

6.5 Control external documents

External reference documents not available on the company server (e.g. Regulations, Technical Memorandums, Code of Practice, Professional Guidelines / Notes, MSDS for raw materials) shall be properly collected and maintained by the *HSE*. The *HSE* shall maintain and update a master list of external documents for control purposes and make it accessible to staff. Controlled copies of reference documents shall be marked with a red chop of “controlled document”. The *HSE* shall maintain records for document distribution.

6.6 Computer Backup, Security and Control

- 6.6.1** Responsible personnel shall back up the server data *every day*.
- 6.6.2** For the control of access rights to the HSE documents on the company server, it shall be ensured that only the HSE and the RSGA/RSGS are able to change documents on the server. All other staff shall be able to read and print the documents only.


7.0 Records

These documents are referred to in the Master List of Communications (MR_4.3.3-B), which indicates responsibility, place and time of filing, in compliance with regulations and internal requirements.

Those responsible for archiving must:

- ensure that records are legible and readily identifiable
- ensure it is ready traceability
- keep them in suitable environmental conditions to prevent damage, deterioration or loss;
- physically delete records whose retention time has expired.

Record Description	Record Location/ Retention Responsibility	Minimum Retention Time
Master List of Communications (MR_4.3.3-B)	Server / <i>HSE</i>	Keep update version
Master Document distribution list (MR_4.4.5-A)	Server / <i>HSE</i>	Keep update version

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Master List of HSE Documents (MD_4.4.4)	Server / <i>HSE</i>	Keep update version
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