1.0 Purpose

The purpose of this procedure is to ensure processes are in place to initiate corrective and preventive actions, with the objectives to:

- Address and rectify non-conformities and deficiencies in NCPL's Quality, Environmental, OHSE, Asset and Event Management System. (IMS)
- Provide for the analysis of non-conformities and monitor any trends that may become evident.

This procedure covers all incidents where non-conformities and/ or deficiencies are detected during the internal or external audits or whenever an accident/incident occurs that may affect the integrity of NCPL's Quality, Environmental, OHSE, Asset and Event Management System.

Any corrective action taken to eliminate the cause of non-conformity is appropriate to the magnitude of the problem whilst also being in proportion to the risks presented by the non-conformity. Root causes of process non-conformities, including those arising from complaints are investigated and actions implemented to prevent their recurrence.

2.0 Responsibility

The Heads of Departments are responsible to the Chief Executive Officer for examining and analyzing non-conformances, monitoring corrective actions, and where appropriate, reviewing existing systems for any necessary improvements in accordance with the documented procedures.

3.0 Procedures

The Heads of the Department shall record all complaints from customers, vendors, and staff.

- All identified non-conformities and / or potential non-conformities shall be investigated to identify the root cause.
- The Quality records, generated as a result of measurement and monitoring of NCPL's services, are analyzed and corrective and preventive actions are initiated to make improvements in line with the Quality Policy.

- Corrective actions are initiated by the Head of Departments to eliminate the root cause of non-conformity, based on the priority as determined by the magnitude of the severity of non-conformance, the potential risk of customer dissatisfaction and the required level of resources.
- All such corrective actions are regularly monitored to ensure that solutions are positively implemented and the same are effective. Changes brought in the procedures and systems as a result are incorporated in the Quality Documents as per documented procedure for document control.
- When appropriate suppliers shall contribute to conformity evaluation and to addressing non-conformity.
- Evaluate with the participation of workers and involvement of other relevant parties and stakeholders the need for corrective actions to eliminate the root cause in order to prevent recurrence.
- Determine if similar incidents have occurred if non-conformities exist or if they could potentially occur.
- All critical issues identified for corrective and preventive actions and the subsequent resolution of them are reviewed in the Management Review / BSR meetings.
- A structured approach that may include problem definition, process mapping, data collection, analysis of root causes, working out countermeasures and checking the effectiveness is followed by NCPL to ensure a lasting solution to the identified problem. The records, as applicable of preventive actions are also maintained.
- The Head of Department will undertake to identify system failures and to correct these as quickly as possible in order to prevent, where possible, any adverse effects upon the services provided by NCPL. The Heads of Departments will post revised processes and procedures to the IMS ISO portal site.

- The Head of Department when satisfied that the corrective action taken is effective, signs and closes out the NCR. The closed-out NCR is copied to the originator and all affected parties by the Heads of Departments who keeps all NCRs on file and monitors that the corrective action taken remains effective.
- Where the corrective or preventive action involves the amendment of a procedure or work instruction, the NCR can be considered closed out when the proposed changes have been confirmed by the Head of Department and when appropriate Lead Auditor and procedures have been modified and put in place.

Appropriate corrective actions may take the form of:

- Revision of a company procedure or form.
- Issue of a new procedure and/or work instruction.
- Removal of a supplier / sub-contractor from the Company's Approved List.
- Ensuring that personnel adhere to company procedures.
- Further training or education.
- Dismissal of personnel.
- Review of Management Agreement.

4.0Records

- Corrective and Preventive Action records.
- Non-Conformance Reports.
- Management review / BSR Meeting Records.

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CORRECTIVE & PREVENTIVE ACTIONS