


Non-Conformity Sheet No. 001

 minor Major

DESCRIPTION	Reference(s): Decree 2021-461 §. a	Concerns <input checked="" type="checkbox"/> application <input type="checkbox"/> la documentation	
	Wording of the Non-Conformity observed Site(s) concerned: Weilmann Neufchâteau Recyclage		
Although the organization has carried out a risk analysis of losses and leaks and located them on a plan, the risk reduction actions are not subject to monitoring of their progress.			
Evidence: seen document DOC 393 Loss rating and pellets updated on 08/12/22. Significant risks are identified with associated actions and drivers. However, the document is not completed with monitoring of the implementation of actions.			
Risk: failure to carry out risk reduction actions.			
Name of listener: Isabelle Bossler		Date: 12/14/2022 Visa: IB	
Causes analysis :			
- Feedback on the progress of projects or actions not provided by the designated pilots			
Correction(s) and/or Corrective Action(s) proposed :			
Status of action plans completely reviewed with the pilots, DOC.193 updated attached			
Date of application : 30/01/2022			
Representative of the organization: Sacha KATIC		Date :04/01/2023	Visa : 
Listener comments:			
Appropriate response to non-compliance. Relevant action. The evaluation of the effectiveness of the action will be verified during the next audit.			
Awaiting verification:			
<input checked="" type="checkbox"/> on the site <input type="checkbox"/> Offsite			
Name of listener: Isabelle Bossler		Date : 08/01/23	Visa : IB
Verification of the implementation of the action plan.			
Completed action(s): <input type="checkbox"/> lifted <input type="checkbox"/> no		<input type="checkbox"/> Deviation	
Effective action(s): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Unresolved deviation renewed as Non-Compliance no.	
Comments:			
Listener Name:		Date :	Visa
Nature and justification for the variation modification (if applicable):			
Name of the responsible Certification		Date :	Visa

C1: If the action plan is the desired interest, validation must be can only be validated when the audited organization presents actions deemed sufficient
 validated by The announced before any certification decision.

Non-Conformity Sheet No. 002

 minor Major

Reference(s): Decree 2021-461 §: c Concerns the application the documentation
 Wording of the **Non-Conformity observed** Site(s) concerned: Wellman Neufchâteau Recyclage

Not all measures to prevent the spread of plastic pellets in the environment are effectively implemented.

Evidence:

- A skip from the service provider SITA SUEZ containing plastic waste has a hole (diameter d'environ 20cm).
- At the storage area for finished products under a canopy, at the triple centrifugation door, presence of fines and flakes released outside through holes in the cladding.

Risk: Plastic granules and dust could be dispersed in the environment throughout the journey to the destination.

Name of listener: Isabelle Bossier

Dates : 12/14/2022 Visa : IB

Causes analysis :

- Condition of unpowered skips in the monthly QHSE checklist
- Storage area for materials in stock not referenced on the floor plan

Correction(s) and/or Corrective Action(s) proposed :

- Email written to the SUEZ service provider on December 16, 2022, on the condition of the skips with photo, a new skip in good condition was installed on December 19, 2022
- Storage area integrated into DOC.393, as well as on the ground plan on December 30 2022.
- Request to impose specifications on the state of the BB received from our sales representative by email dated December 20, 2022. For information, these BBs do not correspond to the finished product but to batches of flakes that we purchase in order to be turbined in our process.
- Integrate the verification of the condition of BBs and presence of materials on the monthly QHSE Checklist

Representative of the organization: Sacha KATIC

Date :03/01/2023

Visa :



Listener comments:

Complete root cause analysis. Relevant action plan. Correction completed within 5 days. The corrective actions, for the most part well underway, are likely to remove the non-compliance. The evaluation of the effectiveness of the actions will be verified during the next audit.

Awaiting verification:

 on the site Offsite

Name of listener: Isabelle Bossier

Date : 08/01/23

Visa : IB

Verification of the implementation of the action plan

Completed action(s) : filed no DeviationEffective action(s): Yes No Unresolved deviation renewed as Non-Compliance no.

Comments:

Listener Name:

Date :

Visa

Nature and justification for the variation modification (if applicable):

Name of the responsible

Date :


Visa

Certification

* If the action plan is the deemed relevant, validation must be can only be validated when the audited organization presents actions deemed sufficient
 listener. By The pronounced before any certification decision.

Non-Conformity Sheet No. 003

 minor Major

Reference(s): Decree 2021-461 §. c		Concerns <input checked="" type="checkbox"/> application <input type="checkbox"/> documentation	
Wording of the Non-Conformity observed Site(s) concerned: Wielman Neufchâteau Recyclage			
Some recycling process equipment is not effective in containing dust from plastics.			
Evidence: At the dry grinding stage at 8mm, there is no rollover on the vibrator. Lots of dust throughout the room. No access possible by basket to carry out a complete cleaning.			
Risk: The plastic dust generated will potentially be spread outside the site.			
Name of listener: Isabelle Bossler		Dates : 12/14/2022 Visa : IB	
Causes analysis :			
- Under-capacity technology to be able to collect dust released by certain processes (dry crusher, chaff sorting machines, etc.)			
Correction(s) and/or Corrective Action(s) proposed :			
- Delta Neu dust collector planned to be installed after the Gala project planned for January 2023			
- Delta Neu project, hoped to be definitively installed and operational in April 2023			
Date d'application : 01/04/2023			
Representative of the organization: Sacha KATIC		Date : 04/01/2023	Visa : 
Listener comments:			
Clear root cause analysis. Relevant and appropriate technical action plan to resolve non-compliance.			
Awaiting verification:			
<input checked="" type="checkbox"/> on site <input type="checkbox"/> Offsite			
Name of listener: Isabelle Bossler		Date : 08/01/23	Visa : IB
Verification of the implementation of the action plan			
Completed actions) : <input type="checkbox"/> Effect <input checked="" type="checkbox"/> no		<input type="checkbox"/> Deviation	
Effective action(s) : <input type="checkbox"/> Yes <input checked="" type="checkbox"/> no		<input type="checkbox"/> Unresolved deviation renewed as Non-Compliance no.	
Comments:			
Listener Name:		Date :	Visa
Nature and justification for the variation modification (if applicable):			
Name of the responsible Certification		Date :	Visa

* If the action plan is the of the listener, of the auditor, of the organization, it can only be validated when the audited organization presents actions deemed sufficient by the listener, by the auditor, by the organization.

Non-Conformity Sheet No. 004

 minor MajorReference(s): Decree 2021-461 §: c and d Concerns the applicator la documentation

Wording of the Non-Conformity observed Site(s) concerned: Weifman Neufchâteau Recyclage

Not all cleaning and collection measures on site are being carried out as planned.

Evidence:

- Although the organization places an annual order with an ESAT which covers outdoor collection and around the site, many particles as well as plastic dust are visible around the site, in particular near the portal of the services of relief.
- Storage of raw materials in flakes under a canopy at the level of the triple centrifuge several pierced big bags are not repackaged as planned.

Risk: dissemination of plastic granules in the environment.

Name of auditor: Isabelle Bossler Date: 14/12/2022 Visa: IB

Causes analysis :

- Lack of human skills to properly clean the surroundings of the site and the areas of storage and transit
- Storage area for materials in stock not referenced on the floor plan

Correction(s) and/or Corrective Action(s) proposed :

- To speak with the Meganet company to find suitable personnel for cleaning the surroundings and storage and transit area.
- Acquisition of cleaning equipment according to the available budget (tests of different technologies were carried out from October to December in the workshops)
- Request to impose specifications on the state of the BB received from our sales representative by email dated December 20, 2022. For information, these BBs do not correspond to the finished product but to batches of flakes that we purchase in order to be turbined in our process.
- Integrate the verification of the condition of BBs and presence of materials on the monthly QHSE Checklist

Date d'application : 01/03/2023

Representative of the organization: Sacha KATIC

Date : 04/01/2023

Visa :



Listener comments:

Complete root cause analysis. The proposed corrective actions seem relevant to address the non-compliance. The evaluation of the effectiveness of the actions will be verified during the next audit.

Awaiting verification:

 on the site Offsite

Name of listener: Isabelle Bossler

Date : 08/01/23

Visa : IB

Verification of the implementation of the action plan

Completed action(s) : listed no DeviationEffective action(s) : Yes No Unresolved deviation renewed as Non-Compliance no.

Comments :

Listener Name:

Date :

Visa

Nature and justification for the variation modification (if applicable):

Name of the responsible
Certification

Date :

Visa

* If the action plan is the shared relevant, validation must be can only be validated when the audited organization presents actions deemed sufficient
listener by The professional before any certification decision.

Non-Conformity Sheet No. 005

 minor MajorReference(s): Decree 2021-461 §: b and c Concerns the application la documentationWording of the **Non-Conformity observed** Site(s) concerned: Wellman Neufchâteau Recyclage

Evidence of completion of cleaning or verification activities is not systematically available during the audit.

Evidence:

- DOC 402 A of June 2022 Factory Cleaning Schedule by the Mega Net company indicates the areas to be cleaned each day of the week, however, the company does not keep any records of what is actually cleaned daily by the cleaning company.
- The Weekly Maintenance Monitoring document for cleaning activities in production is not systematically filled in according to the defined frequency and according to the legend. Presence of a bar instead of a cross and some boxes remain empty.
- Although sweeping the park and cleaning the surrounding area is part of the park logistics forklift operator position, there is no record attesting to the completion of this activity. The ground in the outdoor park is littered with plastic waste of all sizes and some pellets are on the ground in the covered storage areas.
- The technical agent of the treatment station is in charge of maintaining the filter of the canal collection of water from the site before the basins. However, no record of the completion of this check is kept.

Risk: cleaning or verification activities not carried out

Name of listener: Isabelle Bossler

Dates : 12/14/2022 Visa : IB

Causes analysis :

- Lack of support for verifying cleaning carried out on park sweeper stations. Interview through the Méganet company and rain basin collection mat

Correction(s) and/or Corrective Action(s) proposed :

- Documented supports put in place soon for the positions mentioned
- Existing DOC.407 for the production and creation of additional supports for other positions to be monitored (DOC.411 -DOC.412-DOC.213-DOC.214-DOC.215)

Representative of the organization: Sacha KATIC

Date : 04/01/2023

Visa :



Listener comments:

Cause identified. Adapted and relevant action plan to resolve non-compliance. The evaluation of the effectiveness of the actions will be verified during the next audit.

Awaiting verification:

 on the site Offsite

Name of listener: Isabelle Bossler

Date : 08/01/23

Visa :

IB

Verification of the implementation of the action plan

Completed action(s) : listed no DeviationEffective action(s): Yes No Unresolved deviation renewed as Non-Compliance no.

Comments:

Listener Name:

Date :

Visa

Nature and justification for the variation modification (if applicable):

Name of the responsible
Certification

Date :


Visa

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Listener by The professional before any certification decision.



Non-Conformity Sheet No. 006

 minor Major

References: ICPE Order No. 1531 of 2007	§ : 7.4	Concerns the application <input checked="" type="checkbox"/>	is documentation <input type="checkbox"/>
Wording of the Non-Conformity observed Site(s) concerned: Wellman Neufchâteau Recyclage			
The site does not comply with the obligation to control access by an effective fence over its entire periphery.			
Evidence:			
Emergency services gate: the fence has been cut. The site is subject to multiple visits by a person outside the company. The installation of a camera made it possible to identify the person and begin the official complaint procedure. However, the fence has not yet been replaced.			
- The gate at the parking lot for visitors and light employee vehicles is not closed during the day of the audit.			
Risk: regulatory non-compliance			
Name of listener: Isabelle Bossler		Date: 12/14/2022 Visa: IB	
Causes analysis :			
- Approaches and fencing not referenced in the monitoring to be followed in the CHSE checklist			
Correction(s) and/or Corrective Action(s) proposed :			
- Integration and monitoring of the condition of the surroundings and general condition of the site fence in the checklist.			
- Reminder note to staff so that the gate is closed after each passage, email of the 20th December 2022			
- Repair of the fence damaged by the maintenance department in our action plan			
Date of application : 01/02/2023			
Representative of the organization: Sacha KATIC		Date : 04/01/2023	Visa : 
Listener comments:			
Cause analysis carried out. Relevant and appropriate corrective actions to resolve the non-compliance. The evaluation of the effectiveness of the actions will be verified during the next audit.			
Awaiting verification:			
<input checked="" type="checkbox"/> on the site <input type="checkbox"/> Offsite			
Name of listener: Isabelle Bossler		Date : 08/01/23	Visa : IB
Verification of the implementation of the action plan			
Completed action(s) :		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Gap lifted
Effective action(s) :		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Unresolved deviation renewed as Non-Compliance no.



Comments:		
Listener Name:	Date :	Visa
Nature and justification for the variation modification (if applicable):		
Name of the responsible Certification	Date :	Visa

! If the action plan is the listener's responsibility, validation must be performed by the listener before any certification decision. can only be validated when the audited organization presents actions deemed sufficient