

COMPLIANCE PACK



EXPERTS IN CAST, ROLLED AND SANDCAST LEAD

With a high volume of customers, we are frequently asked to complete and submit various Vendor Information/ Approval documents; we have developed this pack to provide valuable information to our new customers in the most time effective way possible. This pack contains general information about our company, nature of our business and the management of Health, Safety, Environment, Quality and relevant accreditations.

Midland Lead is the only UK lead manufacturer to offer the entire range of lead products, to markets as diverse as construction, healthcare and heritage. From weatherproofing historic Cardiff Castle and producing over 600,000 tonnes of lead sheet for the UK buildings, to providing vital radiation protection to hospitals throughout the world.... We are proud to be the experts in cast, rolled and sandcast lead.

Our Derbyshire based premises sits on a 13-acre site employing approximately 55 members of staff which is split evenly across Sales and Operational members.

QUALITY

Midland Lead is certified by the BBA – Certificate No: 86/1764. This gives you these key assurances.

Our machine cast lead:

- Complies with Building regulations where applicable
- Is independently assessed with regards to technical and chemical specification
- Is subjected to spectro-lab analysis to ensure it meets the required standard

We are re-assessed every six months to ensure we continue to meet BBAs required standard. We have implemented a management system which meets the standards of ISO 9001.

ENVIRONMENT

At Midland Lead all lead we produce is manufactured using 100% recycled material, the recycling of lead does not affect the quality of the finished product, not even a little. We are a registered Scrap Metal Dealer and operate under an IPPC Permit.

We work hard to ensure we meet the requirements of the Integrated Pollution Prevention and Control IPPC permit, regulated by the Environment Agency. That means every aspect of our business that could have an impact on the environment is regularly checked and monitored. We are also required to demonstrate what steps we take to reduce our energy use, minimize waste production – and minimize emissions to air, land and water. We have implemented a management system which meets the requirements of ISO 14001 and made the transition to ISO 14001:2015 in 2016.

HEALTH AND SAFETY

Midland Lead are a Tier 2 COMAH site and as such our operations are monitored by the HSE and Environment Agency. We take the management of health and safety and the protection of our employees, contractors and visitors very seriously. We have implemented a management system which meets the requirements of OH SAS 18001 and are preparing to make the migration to ISO 45001.

GENERAL INFORMATION

Midland Lead Holdings Ltd

Registered office:

Kiln Way
Woodville
Swadlincote
Derbyshire
DE11 8ED

Head office:

Kiln Way
Woodville
Swadlincote
Derbyshire
DE11 8ED

Company Reg No:

10079848

Director:

C.B Tuinenburg

Tel: +44 (0)1283 224555

Fax: +44 (0)1283 550284

Email:

sales@midlandlead.co.uk

Website:

www.midlandlead.co.uk



POLICIES

OCCUPATIONAL HEALTH AND SAFETY POLICY

We at Midland Lead are committed to providing a safe and healthy environment for all our employees and the prevention of injuries and ill health. We also ensure, as far as is reasonably practicable that our work does not affect the Health and Safety of persons who are not our employees (visitors, contractors & members of the public). To achieve this, we will comply with all currently applicable Health and Safety legislation, Codes of Practice and any other relevant guidance.

In order to eliminate or minimise risk and prevent injury, ill health, diseases and incidents we will provide, so far as is reasonably practicable:

- A safe place of work, with safe access and egress
- A safe and healthy environment
- A safe system of work
- Safe plant and equipment
- Safe means of handling, transporting and storage of materials, substances and equipment
- Adequate training, instruction, information and supervision
- Adequate welfare facilities


We have established an Occupational Health and Safety Management system in accordance with the requirements of ISO 45001, which is described in our OH&S manual and implemented by the application of appropriate procedures. These provide for:

- Appropriately trained and authorised personnel and financial resources, necessary to implement the requirements of this policy.
- Communication of this policy, objectives and other relevant OH&S information to ensure that all employees are aware of the individual responsibilities regarding involvement, participation and consultation.
- Adequate training for all employees so that they are able to carry out their work in a competent safe and responsible manner.
- We will consult with staff on all areas of health and safety including this policy and ensure they have the opportunity to participate in any health and safety matters.
- Continual review and improvement of the OH&S management system and performance based on results of accident/incident investigations, audit findings and best practice.
- A periodic review of this policy to ensure that it remains relevant and effective.

We remind our employees of their duty to:

- Look after and be responsible for their own health and safety and of others
- Ensure that they do not endanger others by unsafe acts or omissions
- Cooperate fully with us to meet our legal obligations and the requirements of this policy

SIGNED:
Managing Director



DATE: December 2020

REVIEW DATE: December 2021

POLICIES

ENVIRONMENTAL POLICY

We at Midland Lead are aware of the potentially harmful effects of our emissions on the environment and the nuisance caused by excessive noise.

Consequently, we are committed to minimise the adverse environmental impact of our operations, products and services and will achieve this by:

- Complying with all applicable legislation, Codes of Practice and any other relevant requirements.
- Monitoring, Controlling and endeavouring to reduce emissions in accordance with the requirements of our Environmental Permit – EPR/UP3138ZQ.
- Endeavouring to improve energy and other resources efficiency and reduce waste by applying best available practices.
- Maintaining a programme of continual improvement in environmental performance
- Providing the necessary training to enable all employees to discharge their responsibilities effectively.
- Involving our employees and any other persons working on behalf of the company, in our environmental policy, objectives and targets.

We have established an Environmental Management System in accordance with the requirements of BS EN ISO 14001:2015, which is described in our EMS Manual and implemented by the application of appropriate procedures for the provision of:

- Appropriately trained and authorised personnel and financial resources, necessary to implement the requirements of this policy
- Communication and consultation of this policy, objectives and any other relevant information to ensure that all employees are aware of their individual responsibilities regarding involvement, participation and consultation necessary for the effective application of the system.
- Continued cost effective improvement of the environmental management system and performance based on experience gained from accident/ incident investigations, audit findings and best practice.
- A periodic review of this policy to ensure it remains relevant and appropriate

SIGNED:
Managing Director



DATE: December 2020

REVIEW DATE: December 2021

POLICIES

QUALITY POLICY

We at Midland Lead, as a manufacturer and supplier of machine cast, rolled and sand cast lead for the construction, heritage and healthcare industries worldwide. Our vision is to be a supplier of choice to our customers.

Our promise to our customers is to provide added value by:

- Improving our understanding of our customers' needs and expectations
- Understanding that our customers' needs and expectations are constantly changing
- Continual improvement of our products and services through the identification and monitoring of Risks and Opportunities


Our promise to our employee's is to create an inspiring and innovative environment by:

- Building an infrastructure of communication
- Communicating clearly and openly across all levels of the organisation
- Creating a culture of learning, flexibility and change throughout leadership
- Developing clear achievable goals
- Being committed to continuous improvement of our processes and Quality Management System
- Consulting and training of this policy

We promise to demonstrate our commitment to Quality, Safety and the Environment by:

- Complying with all applicable statutory laws and regulations
- Maintaining and continually improving our Management Systems
- Continually monitoring and reviewing our policies and processes for suitability and effectiveness. Any improvements identified are implemented as soon as possible.

SIGNED:
Managing Director



DATE: December 2020

REVIEW DATE: December 2021

POLICIES

CORPORATE SOCIAL RESPONSIBILITY POLICY

We at Midland Lead set out the values of the organisation in relation to corporate social responsibility with emphasis on environment.

Corporate Social Responsibility (CSR) is about how companies conduct their business in an ethical way, taking account of their impact economically, socially, environmentally and in terms of human rights. CSR includes social partners such as local communities and global responsibilities such as protecting the environment and ensuring good labour standards in overseas suppliers.

IMPACT ON THE ENVIRONMENT

The organisation is committed to acting responsibly and not damaging the environment.

All employees are required to take this seriously and:

- Recycle materials whenever possible
- Not print of emails unnecessarily
- Consider the ethical stance of suppliers before placing orders
- Dispose of any chemicals responsibly and carefully
- Think about the impact of their actions on the local community

INTERACTIONS WITH THE COMMUNITY


It is important to the organisation to develop good working relationships with the community where the organisation operates. Employees are encouraged to become involved in community activities. Employees must make every effort not to damage the relationships that the organisation has with the community.

INTERACTIONS WITH CUSTOMERS AND SUPPLIERS

All interactions with customers and suppliers should follow the ethical stance of the organisation. Any deliberate non-adherence with the ethical stance might result in disciplinary action.

We at Midland Lead are committed to monitoring and training employees on this policy. We will monitor, review and consult on the effectiveness and any improvements identified are made as soon as possible. Internal control systems and procedures are also implemented to ensure compliance to legislation relating to CSR.

SIGNED:
Managing Director



DATE: December 2020

REVIEW DATE: December 2021

POLICIES

ANTI-BRIBERY AND CORRUPTION POLICY

The company is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on the Company's behalf is responsible for maintaining the Company's reputation and for conducting Company business honestly and professionally.

The Company considers that bribery and corruption have detrimental impact on business by undermining good governance and distorting free markets.

The Company benefits from carrying out business in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in the industry sector. Where there is a level playing field, the Company can lead the market through delivering excellent services and products to its customers.

Transparent, fair conduct helps to foster deeper relationships of trust between the Company and its business partners and customers. It is vital for the Company's reputation and future growth.

The Company does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons acting on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout the Company to prevent, monitor and eliminate bribery in accordance with the Bribery Act 2010.

All employees and other individuals acting for the Company are required to familiarise themselves and comply with the Company's anti-bribery procedure as detailed under this section with immediate effect.

A bribe is a financial advantage or other reward that is offered to or received by an individual or Company (whether directly or indirectly) to induce or influence that individual or Company to perform public or corporate functions or duties improperly.

UNACCEPTABLE BEHAVIOUR

The following is unacceptable behaviour and must not occur:

- Accepting any financial or other reward from any person in return for providing some favour.
- Requesting a financial or other reward from any person in return for providing some favour.
- Offering a financial or other reward to any person in return for providing some favour.

BUSINESS GIFTS

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item or something of considerable value. All gifts, however small, must be reported to the Line Manager and recorded, these gifts and benefits are the property of the Company and the Company will determine the most appropriate method of appointing them amongst the employees. No gifts with a value of more than £25.00 may be accepted. If a gift is offered and then refused because of its value, this must then be reported to the Director. If any of these rules are not adhered to then such activity may be deemed a disciplinary matter and may result in dismissal.

HOSPITALITY

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to your Line Manager. Permission must be given by your Line Manager before an employee accepts an invitation.

ANTI-BRIBERY AND CORRUPTION POLICY

OFFERING GIFTS AND HOSPITALITY

It is the Company's custom to offer small gifts such as pens, diaries, to customers, suppliers and other persons. If a gift is authorised, the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts. The Company occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. An employee must not organise any additional hospitality event without seeking authority from his or her Line Manager.

MANAGER RESPONSIBILITIES

Company Managers are responsible for keeping record of all gifts and hospitality that are offered and/ or received by employees working in the Managers area of responsibility. If a Manager is concerned about any actions, they should contact the Managing Director immediately for advice. Managers are also responsible for ensuring that all employees are aware of this policy and fully understand the rules in relation to the acceptance of gifts and hospitality.

EXPENSES

Line Managers must authorise all expense claims from their employees. In accordance with delegation of authority, Line Managers are expected to check and sign all expense claims from their employees against receipts.

Any items of expenditure that give rise to concern should be fully investigated.

ATTEMPTS TO BRIBE

Any employee who is concerned that he or she is potentially being bribed should report this matter to his or her Line Manager immediately.

DONATIONS TO COMPANIES

No employee should make donations to charity on behalf of the Company without approval off their Line Manager. No donations should be made to charities, political parties or other companies with the intention of gaining a business advantage.

DISCIPLINARY ACTION

A breach of the Company's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal. Employees and other individuals acting for the Company should note that bribery is a criminal offence that may result in up to 10 years imprisonment and or an unlimited fine for the individual and an unlimited fine for the Company.

RAISING CONCERNS

If an employee is concerned that acts of bribery are occurring in the Company, they should inform their Line Manager in the first instance. If this course of action is inappropriate, the employee should inform the Managing Director.

Training on this policy is provided to all employees and workers and our zero- tolerance approach to bribery and corruption will, where appropriate be communicated to clients, suppliers, contractors and business partners.

Midland Lead monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks to bribery and corruption.

All employees and workers are aware that they are responsible for the success of this policy and should ensure that they use it to disclose any wrongdoing.

SIGNED:
Managing Director



DATE: December 2020

REVIEW DATE: December 2021

POLICIES

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

The company recognises the responsibility that we share with our suppliers, to buy materials and deliver our services in an ethical manner. As part of this commitment we acknowledge our responsibility towards the modern slavery act 2015 and will ensure transparency within the organization and with our suppliers of goods and services.

We want our customers to be confident that our business partners treat their employees fairly, with respect for human rights and are not exposed to unsafe working conditions or in any way forced to work under slavery. We believe that when ethical standards are in place, this can improve worker well-being, productivity and quality, which benefits both our suppliers and our customers. Only suppliers who share our standards and values will be considered appropriate to trade with our Company and we seek to develop long term trading relationships with suppliers/ businesses based on the principle of fair, open and honest dealings at all times.

As part of our company's due diligence process we audit our suppliers on a regular basis and will only work with organisations who also commit to the eradication of slavery and human trafficking. Our appraisal process will incorporate a review of the controls undertaken by our suppliers and now also requires from all suppliers an annual statement of their commitment and actions taken to eliminate modern slavery.

Imported products sourced from outside the UK or EC are potentially more at risk of modern slavery or human trafficking issues. If products have to be sourced from such locations, we look to work in partnership with companies who possess certifications which have independently assessed standards that reinforce their commitment to human rights, working conditions and the provision of a living wage.

The Company will not work with any organization that either has or is found to be knowingly involved within either human trafficking or modern slavery.

The Directors and management will be responsible for the application of this policy and ensure all activity complies with The Modern Slavery Act 2015. The Company will provide adequate resources, training and investment to ensure its successful application.

Midland Lead will train employees on this policy and our zero-tolerance approach to Modern Slavery & Human Trafficking. We will monitor the effectiveness and review this policy at appropriate intervals. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks of Modern Slavery & Human Trafficking.

SIGNED:
Managing Director



DATE: December 2020

REVIEW DATE: December 2021

POLICIES

WHISTLEBLOWING POLICY

Whistleblowing is when an individual knows or suspects that there is some wrongdoing occurring within the Company and alerts the employer or relevant authority accordingly.

The Public Interest Disclosure Act 1998 gives protection to individuals, casual workers, agency workers and contractors who make a qualifying disclosure when they reasonably believe it is in the public interest for them to do so.

ACTIONS TO BE TAKEN BY THE INDIVIDUAL

If an individual knows or suspects that some wrongdoing is occurring within the Company, he/ she should raise the matter immediately with the relevant manager. If the individual does not know who to approach, he/ she should, in the first instance, talk to his or her Line Manager.

POSSIBLE SITUATIONS

Although this list is not exhaustive, examples of situations in which it might be appropriate for an individual to report a wrongdoing include:

- A breach, or potential breach of health and safety legislation.
- Financial irregularities
- Harassment of a colleague, customer or other individual
- Damage to the environment
- The committing of a criminal offence
- An act of bribery
- Deliberate concealment of any of the above

ACTION TO BE TAKEN BY THE MANAGER

Any manager who is informed by an individual of potential wrongdoing will take immediate action to investigate the situation. In doing so, the manager will take every possible step to maintain the anonymity of the individual who has made allegation of wrongdoing.

The individual who has raised the issue will be kept informed of any investigation that is taking place. The individual will also be informed of the outcome of the investigation. It might not always be appropriate to tell the individual the detail of the action taken but the individual will be informed if action is taken.

SIGNED:
Managing Director



ALERTING OUTSIDE BODIES TO A POTENTIAL WRONGDOING

An individual should always, in the first instance, talk to a manager in the Company about a potential wrongdoing. If the individual is not satisfied with the response, he / she is entitled to contact a relevant external body to express the concerns. In doing this, the individual should:

- Have a reasonable belief that the allegation is based on correct facts.
- Make the disclosure to a relevant body.
- Have a reasonable belief it is in the public interest to make the disclosure.

A "relevant body" is likely to be a regulatory body such as the Health and Safety Executive or the Financial Conduct Authority, or Public Concern at Work.

CONTACTING THE MEDIA

The media is not a relevant external body. Individuals should not contact the media with allegations about the Company, except in extraordinary circumstances where neither the Company nor the relevant regulatory body would be appropriate.

PROTECTION AGAINST DETRIMENT

Any individual who takes action under the Public Interest Disclosure Act 1998 will be protected from suffering any detriment in relation to the allegations that are made, including victimisation by the Company or by colleagues.

If the individual does not follow the procedure set out, which encompasses the requirements of the Public Disclosure Act 1998, the protection against detriment will not apply. Disclosing information in an appropriate way such as contacting the media, could result in disciplinary action being taken against the individual, which could include summary dismissal.

Midland Lead monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible and as far as is reasonably practicable. Midland Lead will also train employees on this policy.

DATE: December 2020

REVIEW DATE: December 2021

Certificate of Registration

QUALITY MANAGEMENT SYSTEM - ISO 9001:2015

This is to certify that:

M L Operations Ltd
Kiln Way
Woodville
Swadlincote
DE11 8ED
United Kingdom

Holds Certificate Number:

FS 629362

and operates a Quality Management System which complies with the requirements of ISO 9001:2015 for the following scope:

The manufacture and supply of machine cast, rolled and sand cast lead for the construction, heritage and healthcare industries worldwide

For and on behalf of BSI:



Andrew Launn, EMEA Systems Certification Director

Original Registration Date: 2015-04-30

Latest Revision Date: 2018-04-27

Effective Date: 2018-04-30

Expiry Date: 2021-04-29



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Certificate of Registration

ENVIRONMENTAL MANAGEMENT SYSTEM - ISO 14001:2015

This is to certify that:

M L Operations Ltd
Kiln Way
Woodville
Swadlincote
DE11 8ED
United Kingdom

Holds Certificate Number:

EMS 594768

and operates an Environmental Management System which complies with the requirements of ISO 14001:2015 for the following scope:

The manufacture of lead sheet.

For and on behalf of BSI:



Andrew Launn, EMEA Systems Certification Director

Original Registration Date: 2013-05-14

Latest Revision Date: 2018-05-09

Effective Date: 2018-06-24

Expiry Date: 2021-06-23



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Certificate of Registration

OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM - BS OHSAS
18001:2007

This is to certify that:

M L Operations Ltd
Kiln Way
Woodville
Swadlincote
DE11 8ED
United Kingdom

Holds Certificate Number:

OHS 594769

and operates an Occupational Health and Safety Management System which complies with the requirements of
BS OHSAS 18001:2007 for the following scope:

Manufacture of lead sheet using the Direct Method.

For and on behalf of BSI:

Andrew Launn, EMEA Systems Certification Director

Original Registration Date: 2013-05-14

Effective Date: 2020-11-04

Latest Revision Date: 2020-11-03

Expiry Date: 2021-03-11



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Midland Lead Ltd

Kiln Way
Woodville
Swadlincote
Derbyshire DE11 8ED
Tel: 01283 224555 Fax: 01283 550284
e-mail: sales@midlandlead.co.uk
website: www.midlandlead.co.uk

Agrément Certificate
86/1764
Product Sheet 1

MIDLAND LEAD LTD'S CAST PRODUCTS

MIDLAND LEAD LTD'S CAST LEAD SHEET

This Agrément Certificate Product Sheet⁽¹⁾ relates to Midland Lead Ltd's Cast Lead Sheet, for use as external roofing, cladding and flashing.

(1) Hereinafter referred to as 'Certificate'.

CERTIFICATION INCLUDES:

- factors relating to compliance with Building Regulations where applicable
- factors relating to additional non-regulatory information where applicable
- independently verified technical specification
- assessment criteria and technical investigations
- design considerations
- installation guidance
- regular surveillance of production
- formal three-yearly review.



KEY FACTORS ASSESSED

Weathertightness — the product has adequate resistance to the passage of moisture (see section 6)

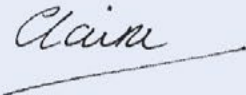
Resistance to wind uplift — when adequately fixed the product can resist the effects of wind suction (see section 7).

Properties in relation to fire — the product is classified as 'non-combustible' (see section 8).

Durability — when correctly installed, the durability of the product will be at least equivalent to that of milled lead, with an ultimate life in excess of 60 years (see section 10).

The BBA has awarded this Agrément Certificate to the company named above for the product described herein. The product has been assessed by the BBA as being fit for its intended use provided it is installed, used and maintained as set out in this Certificate.

On behalf of the British Board of Agrément

Date of Fourth issue: 20 March 2014

Originally certificated on 30 October 1986

Certificate amended on 03 April 2014 to incorporate change to Table 1.

Simon Wroe
Head of Approvals — Materials

Claire Curtis-Thomas
Chief Executive

The BBA is a UKAS accredited certification body — Number 113. The schedule of the current scope of accreditation for product certification is available in pdf format via the UKAS link on the BBA website at www.bbacerts.co.uk

Readers are advised to check the validity and latest issue number of this Agrément Certificate by either referring to the BBA website or contacting the BBA direct.

Midland Lead Ltd

Kiln Way, Woodville, Swadlincote
Derbyshire, DE11 8ED
United Kingdom

Follow us:    

t: +44 (0)1283 224555
f: +44 (0)1283 550284
e: sales@midlandlead.co.uk
www.midlandlead.co.uk

