

Group Integrated Management Systems Manual

(Please refer to the Group Logistics Manual & Policy Documents November 2022 for *FORS accreditation)

- Quality (ISO 9001, CE 1090, NHSS3b)
- Environment (ISO 14001)
- Responsible Sourcing (BES 6001)
- Safety (working towards ISO 45001)
- FORS (Dartford)

Group Management Systems Manual - Contents

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Amendment & Review

Any significant amendments to this document will be shown in italics (excluding grammatical or formatting).

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Sharon L Smith – Barrett Steel Limited Integrated Management Systems Controlled Document

1. THE GROUP PROFILE

Founded in 1866 by Henry Barrett, the company was primarily Bradford based until 1985 when the company began extending its geographical coverage through further business acquisitions & development. Barrett Steel Ltd is now one of the largest steel stockholding groups in the country.

The original Bradford based company attained its first quality approvals in 1988 with BSI & Lloyds. Since that time individual sites have gained approvals until, in 2000, the Group approval was introduced with BSI.

The Group now lists the following companies with their associated accreditations: -

| Company Location | Trading Names | Certification | - | Activities & Scope 1090 | Scope NHSS3b | Scope BES 6001 |
|--------------------------|--|--|--|---|--|---|
| Bolton | Barrett Engineering Steel Bolton | *9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Bradford | Barrett Steel Limited Barrett Steel Services Limited J Boyd Laurie & Son Limited Barrett Constructional Steels Limited Barrett Strip & Alloy Limited Barrett Steel Scunthorpe Ltd | 9001, 14001, 1090, NHSS3B & BES 6001 | Steel & alloy stockholders, metal processors, steel fabricators & ancillary product suppliers. Stockholding & precision slitting of stainless steels & high-performance metals in coil, sheet & plate form. | Cropping & punching (EXC2), shot blasting, primer painting & drilling (EXC4) | Stocking & Distribution Activities for Structural Steel Products | Product Groups: Steel structural sections, hollow sections & tube, sheet & plate, merchant bar, engineering bar & ancillary products |
| Bristol | Barrett Steel Southwest Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Burton-on-Trent | AH.Allen Steelstock Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Chester | Dragon Steel Services Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Consett | Barrett Engineering Steel Northeast Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Coventry | Mattersons Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Cradley | CMT Steel Services Limited Central Steel Services Limited | 9001, 14001, 1090 & NHSS3B | Steel & alloy stockholders, metal processors & ancillary product suppliers. | Shot blasting, primer painting & drilling (EXC4) | Stocking & Distribution Activities for Structural Steel Products | |
| Dartford | Barrett Dartford Limited | 9001, 14001 FORS | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Dudley | Barrett Steel Tubes Limited Barrett Engineering Steel Midlands Limited Barrett Engineering Steel Ireland Limited Barrett Engineering Steel Southwest Limited Barrett Precision Tubes Limited Barrett Steel Material Handling Barrett Steel Specialist Vehicles | BES 6001 | Steel & alloy stockholders, metal processors, steel fabricators & ancillary product suppliers. | Laser cutting, bending, drilling (EXC4) | Stocking & Distribution Activities for Structural Steel Products | Product Groups: Steel structural sections, hollow sections & tube, sheet & plate, merchant bar, engineering bar & ancillary products |
| Edinburgh (Newbridge) | Barrett Steel Scotland Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Gloucester | Lilleshall Steel Services Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Hull | Struthers & Carter Limited Fastec Handrail Systems Limited | 9001, 14001 & 1090 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | Shot blasting (EXC4) | | |
| Maghaberry | Barrett Steel Ireland Limited | 9001, 1090 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | Shot blasting & primer painting, drilling (EXC4) | | |
| Middlesbrough | Barrett Offshore Limited Parson & Crosland Limited Consett Steel Services Limited Barrett Steel Northeast | 9001, 1090 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | Drilling, plasma cutting (EXC4) | | |
| Montrose | Barrett Steel Scotland North Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |

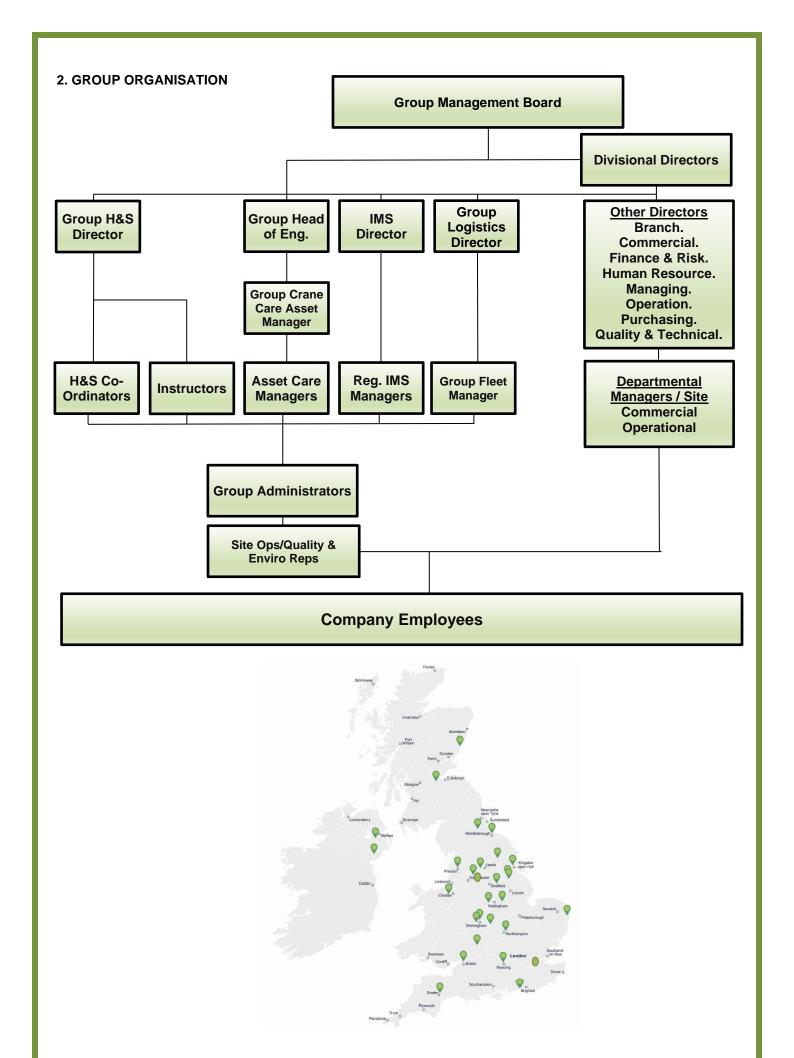
| Newark | Newark Steel Limited | 9001, 14001 & NHSS3B | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | Stocking & Distribution Activities for Structural Steel Products | |
|----------------------------|---|---|---|---|--|---|
| Newry | Barrett Steel Ireland Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Northampton | A. H. Allen Steel Services Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Oldham | Barrett Engineering Steel Northwest Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Preston | Advanced Steel Services Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Reading | Goodman Steel Services Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Rotherham | C. Roberts Steel Services Limited Barrett Engineering Steel North Limited | 9001, CE 1090, 14001, NHSS3B & BES 6001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | Profiling, plasma & laser cutting (EXC 4) | | Product Groups: Steel structural sections, hollow sections & tube, sheet & plate, merchant bar, engineering bar & ancillary products |
| Scunthorpe (Glebe Road) | Kass (Steel Stockholders) Limited | 9001 &14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Scunthorpe (Glebe Road) | Barrett Central Processing Limited (Formerly Omega) | 9001, 14001, 1090 & NHSS3B | Steel & alloy stockholders, metal processors & ancillary product suppliers. | Shot blasting & primer painting, drilling (EXC4) | Stocking & Distribution Activities for Structural Steel Products | |
| Scunthorpe (Brigg Road) | Barrett Steel Tubes North Limited Barrett Steel Trading | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | | | |
| Shoreham | Barrett Steel Shoreham Limited | 9001, 14001, 1090 & NHSS3B | Steel & alloy stockholders, metal processors & ancillary product suppliers | Shot blasting & primer painting, drilling (EXC4) | Stocking & Distribution Activities for Structural Steel Products | |
| Willenhall | Barrett Engineering Steel Willenhall | *9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. (May Include Drawn Material) | Subject to activities | | |
| Yarmouth | Yarmouth Steel Services Limited | 9001 & 14001 | Steel & alloy stockholders, metal processors & ancillary product suppliers. | Cold cutting & drilling of structural steel material (EXC4) | | |

Companies not listed in the formal registration systems are required, by the Business, to operate the 'Best Practise' business controls that are in line with our standard ISO 9001, BS EN 1090, ISO 14001, BES 6001 & other scheme controls.

*It is the intention of the business to incorporate the Bolton & Willenhall location under the Group certificate, scope for ISO 14001 & ISO 9001 – new acquisitions will follow this principle, subject to successful internal audits being completed first.

Post BREXIT CE will be replaced with a UK equivalent proposed to be UKCA & potential changes for North Ireland too UKNI – this will be conducted via a phased approach using appropriate & authorised external certification bodies.

Fleet Operator Recognition Scheme (FORS) Bronze - Held at Dartford



3. RESPONSIBILITIES

The Group Management Board has overall responsibility for the running of the Group in line with the group budget & strategic objectives. They will delegate the responsibility for development & adherence to the Group Policies to the Group System Representatives. They will ensure the resources (human, infrastructure & work environment) are available to ensure that the organisation can meet its customers' & legislative requirements.

The Group Management Board/Divisional Directors are responsible for the running of the Group in line with the group budget & strategic objectives. Each Group company will be chaired by an GMB/Divisional Director. They are responsible for ensuring that the human, infrastructure & work environment resources required for the operation of the Management Systems within the company are defined & facilitated.

The Company Directors/Manager/CEO are responsible to & via the GMB/Divisional Directors for the running of the company in line with budget & strategic objectives. They are responsible for appointing systems representatives, maintaining documentary evidence of the company management structure & the responsibilities of key personnel, within the company systems. They are responsible for defining & facilitating the human, infrastructure & work environment resources required for the operation of the Management Systems within the company.

The Asset Care, Finance, H&S, HR, Logistics, Integrated Management Systems (IMS), Risk Heads/Directors have specific responsibilities for the development & adherence to the Group Policies & Processes. With the general internal auditing being delegated to the Regional IMS Managers & to other identified/competent colleagues & authorised 3rd parties.

These Heads/Directors are directly responsible to the Group Operations Director &/or GMB. Specific responsibilities include ensuring the managements systems are established, implemented & maintained in accordance with the relevant standard & company objectives through regular auditing. They are responsible for reporting the performance of the systems to the management for review & as a basis for on-going improvement to the system.

The organisation chart above indicates the structure within the Barrett Steel Group. Specific responsibilities for the personnel include but are not limited to ensuring the management systems are maintained, at site level, in adherence to the Group Management Systems & business objectives.

The terms used to describe the job functions are those that will be used throughout the manual & its associated documents. When a job function is not occupied the responsibility will be passed to the person holding the job function immediately above the one not occupied. In the absence of the Director/Post holders the relevant Group Management Board acts on their behalf in these matters.

Local representatives are identified & are responsible to their company Director/Manager/CEO for the running of the Group Management System at a site level. In this role, they are provided with the authority to implement & monitor Group requirements & take the necessary corrective action in liaison with site management.

They are responsible for ensuring that the reviews are completed to the Group schedule(s), cover the Group agenda(s)/reporting methods, are fully documented & copies made available to the relevant Director if requested.

They are the site's primary contact for the relevant Director regarding audits/findings, performance issues, KPIs, training & change notification. They are responsible for requesting & agreeing system changes as required & highlighting planned business changes to the relevant Director/Group Management Board.

4. DEFINITIONS

The **Group** shall be read as the companies within Barrett Steel Limited which hold management system approvals through the centralised Group registrations or a stand-alone accreditation.

The Company shall be read as any individual company within the Group. Where there are several operating trading names at one location the Management Systems will be common across the location & the term "company" will be understood to refer to the whole location.

The Computer shall be understood to be the active IT Platform(s) or associated computer systems (whichever is applicable to the site under consideration) & all related software including external portals.

The Company Systems Representative shall be read as the individual, based at the company, with whom the External Auditor, the relevant Director & IMS/H&S/Instructors will liaise.

The Company Director/Manager/COO shall be read as the senior manager at each site who may be a Managing Director, Branch Director, Branch Manager or COO.

The term Management System can be taken to include the Factory Production Control (FPC) under BS EN 1090, NHSS Scheme 3B, BES 6001, *FORS & the Environmental Management System (EMS) or H&S Management System & processes.

5. THE GROUP MANAGEMENT SYSTEM

The Group Management System will consist of the following: -

- 1. This Group Policy Document outlining the steps taken by the Group to meet the requirements of BS EN ISO 9001, BS EN 1090-1, BS EN 14001, NHSS3B, BES 6001, FORS & working towards ISO 45001.
- 2. The IMS is responsible for the issue & update of this document. Relevant policy revisions are authorised by the CEO, the IMS or the H&S Director.
- 3. This document is controlled by the IMS. All companies have read only access to the Group Policy Document confluence file. Any printed copies will be treated as uncontrolled.
- 4. Group Processes, SWP's, SOP's & Policies outline the work activities concerned with the operation of the business in areas relevant to assurance & compliance. They detail the authority & responsibilities of the individuals who must operate the processes. The processes are developed, updated & authorised by the relevant Director in conjunction with relevant company management. A fully controlled index of company processes can be found within the defined section of the Intranet.
- 5. Records of operations are retained to demonstrate conformance to the Management System & BS EN ISO 9001, BS EN 1090-1, BS EN 14001, NHSS3B, BES 6001, FORS & H&S activities or other sector schemes. These are filed to preserve their legibility & facilitate retrieval.
- 6. The British & International Standards required by the Group to describe the quality system & the Group's products. All standards are maintained to current issue & amendment levels through a company membership of BSI, ASTM alerts & the BSI Plus Scheme & are controlled by the IMS & Group Technical Manager. Relevant H&S legislation is the responsibility of the H&S Director & they may use resources such as HSE, NASS, BCSA, FORS etc.
- 7. One controlled copy of any supplier product literature, not covered by an appropriate standard, is held. Any other supplier literature, brochures & product data sheets are all considered to be uncontrolled documents & any definitive clarification of a technical question will only be made by reference to the controlled copies of the relevant document.
- 8. Other documentation relating to the business operation is referenced in the relevant Company Processes.

6. SCOPE OF REGISTRATION

Barrett Steel Ltd operates Management Systems which comply with the requirements of BS EN ISO9001/BS EN 14001/BS EN 1090-1/NHSS Scheme 3B & BES 6001, FORS & is working towards ISO 45001 for the following general scope, where specific sites differ this will be clearly detailed on the certificate itself:

Steel & alloy stockholders, metal processors & ancillary product suppliers.

Each company listed on the Certificate of Registration will operate to the scope detailed on their appendix. The scope of the business is reviewed in conjunction with the Group Management Board.

7. SCOPE EVALUATION & PROCESSES

The Group does not undertake the following activities: -

Design & development – in the current activities of the organisation there are limited requirement for a design & development facility. The products sold under the standard Group registrations are all manufactured to British, European, International, or commercial standards through the source of supply.

Drawing/details used within the processing activities are supplied by the customer but may be manipulated, internally, into a format acceptable to our processing facilities eg. NC1 etc.

Bespoke handrail fitting products are designed within the business. These are sold under the Fastec trade name & control of these elements fall within the scope of the QMS/FPC.

Validation of processes – all the products supplied in the standard activities of the organisation can be verified using the standard inspection techniques. There is no, current, requirement for validation of products in the general certificated business. Validation is required for the welding activities & falls within the scope of the QMS/FPC. These exclusions are reconsidered during the annual Group Management Review.

8. RISK & OPPORTUNITIES

The Group operates a process for assessing & implementing preventive action based on an informed risk assessment of the processes employed within the business & their interrelationship. The processes are designed to identify potential problems which can be rectified to prevent the occurrence of non-conformances. Action is initiated to ensure the necessary actions taken are effective.

The processes employed within the Group are generic with regards to systems operated around the systems, although variations may exist in the processing facilities within each company. The relevant Director is responsible for assessing the preventive action required for the generic group activities. The local QA/BI & H&S Representative is responsible for assessing the company specific preventive action requirements in line with the Group Process.

Management of Change (MOC) requirements are performed via the completion of MOC forms (available centrally) – these resources ensure various key activities of the business are considered in terms of risk & impact.

Whilst the strategic preventive action for the Group is considered by the Group Management Board (responsibility for maintenance of such is tasked to the Department Head), in the form of a Strategic Risk Register: Legal, Technological, Competition & Commercial, Internal, Market & Purchasing, Cultural & Social, Economic, Political, Natural & Document Revision. In addition to the above there are multiple "risk registers" relevant to the area of the business they are associated to for example: Credit Risk, Environmental Risk (Impacts & Aspects), H&S Risk Assessments, GDPR (Data Privacy Impact Assessment), IT systems. Where possible Risk Registers will be linked but this is not mandatory due to the scope of the content & intended use to facilitate Business Continuity.

9. CORRECTIVE ACTION

Corrective action may result from sources such as external & process performance reviews (audits), customer satisfaction monitoring or customer complaints relating to the service, the product, documentation, or certification. Environmental or H&S incidents, observations, Global Mandatory Actions, Toolbox Talks may also be the source for action. Specific programs/forms are used to document the nature of the incident, the investigation & any remedial action taken. The analysis of performance may also indicate where corrective action is required through analysis of trends.

Each company operates documented processes for implementing corrective action. Any non-conformance is documented & any remedial or rectification actions established & implemented. If necessary, the Group Processes will be changed to reflect the steps taken to prevent a reoccurrence. Any resulting corrective action is monitored through the Internal Audit Processes & raised at the relevant Committee meetings.

Group Process changes are in accordance with the company Document Control Processes.

10. GROUP MANAGEMENT STRATEGIC REVIEW

The periodic review (usually annually) of the objectives in the Group Policy Statements & overall operation of the Management Systems is conducted by the Group Management Board together with the relevant Director & any other relevant personnel.

The Group Management Review focuses on the continued effectiveness of the individual Group Management Systems, & its application throughout the registered companies, by assessing the internal & external audit findings. A strategic review is performed annually.

11. COMPANY MANAGEMENT REVIEW

The company Management Review of the overall operation of the site Management Systems are conducted by the company director/manager together with delegated representatives from the Systems Committees.

The company Management Systems & Strategic reviews ensure the continued effectiveness of the relevant systems through the examination of business monitoring results (SHEQ), internal & external issues, internal & external audit reports, training records, supplier performance, corrective & preventive actions & strategic business risks & opportunities. Targets are set & reviewed in line with the strategic & local business objectives & to enable continued improvement & legal compliance. These targets are communicated to those who influence the targets.

The results of the Management Reviews are monitored on an on-going basis through the Committee Meetings, as are any decisions regarding corrective action, changes in process & other improvements to the Systems. The minutes of these reviews are accessible to the relevant Director for review at the Group Management Review.

12. PROCESS PERFORMANCE REVIEWS (AUDITS)

Process Performance Reviews of the documented processes & their interrelationship are carried out on a scheduled basis to ensure that all processes are reviewed at site level & a process risk basis, by the IMS/H&S &/or other authorised 3rd Parties, team members & competent site personnel, as detailed in the Group Processes.

The Process Performance Reviews include objective evidence of the documents or processes checked recommendations for improvement, details of any non-conformance, & the agreed timescale for rectification at each stage of the audit including completion. The results of audits are discussed at the relevant meetings & are subject to periodic review.

FORS: Where identified at site level eg. Barrett Steel Dartford