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# QUALITY, ENVIRONMENTAL, OCCUPATIONAL HEALTH AND SAFETY MANUAL



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### Revision History

Rev.	Description of Change(s)	Author	Effective Date
0.0	Initial release	Lee Ngee Boon	Jan 2005
1.0	Revision of document to include OHS system	Lee Ngee Boon	31 <sup>st</sup> May 2007
2.0	Revision of document to include EMS system	Roy Tan	2 <sup>nd</sup> Mar 2009
2.0	Under Section 1.3 Scope and Permissible Exclusions, pp. 1, clause 7.6, "Monitoring & Measuring <u>Devices</u> " is amended to "Monitoring & Measuring <u>Equipment</u> ".	Yam C M	2 <sup>nd</sup> Mar 2009
2.0	Under Section 2.6 Management Review, pp. 6, "Review the QEHSMS <u>at planned interval</u> " has been amended to "Review the QEHSMS <u>at least once per year</u> ".	Yam C M	2 <sup>nd</sup> Mar 2009
3.0	Revision to documents layout. Renamed as MMOP-MAN-01	Yam C M	2 <sup>nd</sup> May 2012
3.0	The statement "...at 1 Raffles Place #21-03 1 Raffles Place Singapore 048616" has been deleted from Section 3 of this document.	Yam C M	2 <sup>nd</sup> May 2012
3.0	Section 2.6, The input to management review is amended to include: "performance and improvement opportunities" and "Process performance and product conformity". The input on "Quality Issues" has been deleted from this document	Yam C M	2 <sup>nd</sup> May 2012
4.0	Revised the Manual for conversion as per ISO 9001:2015 and ISO 14001:2015 changes	Yam C.M	18 <sup>th</sup> Feb 2016
5.0	Revised the OHSMS to address the new ISO 45001:2018 edition	Yam C.M.	1 <sup>st</sup> Feb 2019

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## 1 Quality, Environmental, Health and Safety Management System (QEHSMS)

### 1.1 General Requirements

#### 1.1.1 Introduction

**MIDLAND METALS OVERSEAS PTE LTD** has established, documented, implemented, maintain and continually improve its QHSMS in accordance with current ISO 9001, ISO 14001 and ISO 45001 standards.

As part of implementing the QEHSMS, the company has:

- Identified processes needed for Quality, Environmental and OH&S controls
- Determined the sequence and interaction of these processes
- Determined criteria and methods required to ensure effective operation and control
- Measured, monitored and analyzed processes
- Implemented action necessary for planned results and continual improvement

#### 1.1.2 Midland and Its Context

Midland Metals Overseas Pte. Ltd is in the trading business for Cables, Wires and Components. Depending on the customers' specifications and requirements, Midland would source suitable materials from suppliers around the region. The materials are directly shipped to customers from the supplier base after a 3<sup>rd</sup> party inspection & test. Therefore, Midland operates in an office environment, coordinating the order processing and delivery but no operations are involved.

The management team shall periodically assess the internal and external issues (both positive and negative factors) pertinent to the Quality and Environmental Management Systems of Midland and initiate suitable actions (where needed) to address such issues. The assessment will be documented as per QEMS Risk Assessment Report.

External Issues could be from Legal, Technological, Competitive, Market, Cultural, Social and Economic environment – of international, national, regional or local.

Internal context could be from issues affecting Midland, from factors like Values, Culture, Knowledge and Performance of Midland.

### 1.2 General Documentation Requirements

#### 1.2.1 The QEHSMS Documentation Includes:

- Requirements in ISO 9001, ISO 14001 and ISO 45001 standards
- Requirements to ensure effective operation and control of processes
- Requirements to ensure an environmentally friendly, safe and healthy workplace

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### 1.2.2 Needs and Expectations of Interested Parties

The interested parties of Midland for its Quality Management System are its Stakeholders, Customers, Suppliers, Employees, Regulatory Authorities, 3<sup>rd</sup> Party Inspection Labs and Logistics Providers.

For our QEHS Management System, the interested parties are Customers, Suppliers, local regulatory authorities like ACRA, Singapore's Ministry of Environment, Ministry of Manpower (MOM)), Singapore Civil Defence Force (SCDF), our Employees and the Landlord of the office premises.

The QEHS Committee shall review periodically the list of interested parties, their needs and expectations and address how Midland could fulfill these needs and expectations.

Review results would be updated and maintained by the Management Representative under QEHS Risk Assessment Report for all three Standards.

If some of these needs and expectations become compliance obligations, respective department shall implement actions to ensure compliance.

### 1.3 Scope and Permissible Exclusions

The scope of the QEHSMS for MIDLAND METALS OVERSEAS PTE LTD covers the Quality, Environmental and Occupational Health & Safety management requirements for the following in Singapore:

- Procurement and Supply of Cables, Wires and Components

Midland's QMS processes and their interactions are described in procedure MMOP-ISO 02 ("Business Processes, Roles, Responsibilities, Accountability and Authority").

The inputs, outputs, resources needed are defined in the procedure and also to address the risks and opportunities as identified for the QMS.

Respective process owners shall evaluate the processes regularly and implement any changes as needed to ensure the processes achieve intended results and improved.

Documented information (Documents / Records) required to support the operation of our processes are described in relevant procedures.

The following elements are excluded from our Quality Management System (ISO 9001:2015):

- As a trading company, we do not engage in any design and development of the products.
- We do not have any property from customers or external providers in our custody or included for usage in the final product. Also, MMOP does not practise 'Process Validation'
- We do not use any monitoring and measuring equipment for the products that we trade.

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## 2 Management Responsibility

### 2.1 Management Commitment

The Director has demonstrated evidence of commitment by the following:

- Taking accountability for the effectiveness of the QEHSM System
- Communicating the importance of effective QEHSMS, conforming QEHSMS requirements and meeting customer as well as regulatory and legal requirements to all staff
- Ensuring integration of the QEHSMS into Midland's business processes
- Promoting the use of process approach and risk-based thinking
- Establishing Quality, environmental, health and safety policy and objectives and ensuring that the policy and objectives are compatible with the context and strategic direction of Midland.
- Conducting Management Reviews, ensuring QEHSM achieve intended results and promoting continual improvement
- Assuring open opportunities of platform for employees to communicate and participate in matters concerning the QEHS management systems.
- Ensuring availability of necessary resources for quality, health and safety measures
- Engaging, directing and supporting persons to contribute to the effectiveness of QEHSMS
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

Reference Procedure/Document:

Quality, Environmental, Health and Safety Policy

### 2.2 Customer Focus

The Director and all managers shall ensure that customer needs and expectations and applicable statutory / regulatory requirements are determined, understood and consistently met.

The risks and opportunities that can affect conformity of Midland's products and services and the ability to enhance customer satisfaction are determined & addressed

The focus on customer satisfaction is maintained.

### 2.3 Quality, Environment, Health and Safety Policy

The Director has ensured that the documented quality, health and safety policy is:

- appropriate to the purpose and context of Midland and supports our strategic direction
- suitable and adequate platform and avenue for employees to discuss issues relevant for their interaction in the OHSMS.
- commitment to meet applicable requirements and continual improvement of QEHSMS
- commitment to comply with current applicable Environmental and OH & S legislation. This will include any client-specified EHS requirements
- commitment to the protection of the environment, including prevention of pollution and other specific commitments relevant to the context of Midland
- provides framework to establish and review Quality, environmental, health and safety Objectives
- communicated and understood by employees and applied within the company

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- be available to interested parties and maintained as documented information
- reviewed for continuing suitability

Reference Document:  
Quality, Environment, Health and Safety Policy

## 2.4 Planning

### 2.4.1 Planning For Quality, Environmental Aspect and Impact, Hazard Identification, Risk Assessment and Risk Control

The company has established and maintained procedure for the ongoing environment aspect and impact identification, evaluation and control measures, hazard identification, risks assessment and risk control measures. These have included:

- Routine and non-routine activities
- Activities of all personnel at work
- Facilities at work

When planning for the QEHS management system, MMOP constantly consider the issues referred to in 1.2.1 and 1.2.2 to address:

- give assurance that the QEHS management system can achieve its intended result (s) ; enhance desirable effects;
- prevent, or reduce, undesired effects
- achieve improvement.

The company has ensured that the results of these assessments and the effects of these controls are considered when setting our **EHS** objectives. This information are documented and kept up to date.

The procedure has defined the company's methodology of hazard identification and risk assessment. It serves as input for:

- Determination of facility requirements, identification of training and development of operational control measures
- Monitoring of required actions to ensure both the effectiveness and timeliness of their implementation

The company has identified potential emergency situations related to the EMS, including those that can have an environmental impact.

Risks and opportunities reviewed are updated and maintained by the MR under QEHS Risk Assessment Report.

#### 2.4.1.1 Occupational Health & Safety (OHS) hazards

Within the defined scope of the OHS management system, MMOP shall determine the OHS hazards of its activities and services that it can control and those that it can influence, and their associated OHS risks



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When determining OHS hazards, MMOP shall take into account:

activities of all personnel having access to its Office (including subcontractors and visitors)

- human behaviour, capabilities and other human factors identified hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of MMOP within the Office
- hazards created in the vicinity of the Office by work-related activities under the control of MMOP
- infrastructure, equipment and materials at the workplace
- changes or proposed changes in MMOP, its activities or materials
- modifications to the OHS management system, including temporary changes, and their impacts on operations, processes, and activities
- any applicable legal obligations relating to risk assessment and implementation of necessary controls
- design and layout of office areas, processes, installations, office equipment, operating procedures and work organization, including their adaptation to human capabilities

MMOP shall determine those hazards that have or can have a significant OHS risk, i.e. significant OHS hazards so as to bring them down to an acceptable level of safety.

MMOP shall communication its significant OHS hazards among the various levels and functions of MMOP, as appropriate.

MMOP shall maintain documented information of its:

- OHS hazards and associated OHS risks;
- criteria used to determine its significant OHS hazards;
- significant OHS risks.

From the assessment, the high-risk hazards are considered in the setting of objectives, implementation of necessary control measures, determination of office requirements, identification of training needs and in the monitoring and measuring of required actions.

When determining controls, or considering changes to existing controls, consideration shall be given to reducing the risks according to the following hierarchy:

- Elimination
- Substitution
- Engineering controls
- Administrative Controls
- Personal Protective Equipment

Reference Document

Hazard Identification, risk assessment and risk control procedure

Environmental Aspects Identification procedure

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#### 2.4.1.2 Actions To Address Risks And Opportunities

While planning the QEHSMS, management / responsible personnel shall consider the internal and external issues to Midland, the needs and expectations of interested parties and determine the risks and opportunities (related to QMS and environmental aspects, compliance obligations and other issues/requirements) that need to be addressed to:

- Assure that the QEHSMS can achieve its intended results
- Enhance desirable effects
- Prevent, or reduce, undesirable effects, including the potential for external environmental conditions to affect Midland
- Achieve continual improvement

#### 2.4.2 Legal and Other Requirements (Compliance Obligations)

The company has established and maintained a procedure for identifying and assessing the legal and other EHS requirements that are applicable to it.

The company has kept this information up to date and communicated to relevant information on legal and other requirements to its employees and other interested parties.

The compliance obligations are taken into account when establishing, implementing, maintaining, and continually improving Midland's EHS management system.

Reference Document:

Legal and other requirements procedure

#### 2.4.3 **Quality, Environmental, Health and Safety Objectives and Planning To Achieve Them**

The Director has ensured that QEHS Objectives are:

- Established at relevant functions and levels
- Measurable and consistent with Quality, Environment, health and safety policy
- Committed to continual improvement
- Included those relevant to the conformity of products and services and enhancement of customer satisfaction
- Monitored, communicated and updated as appropriate

When establishing the EHS objectives, the company has considered the following:

- legal and other requirements
- Significant environmental aspects and Impacts, hazards and risks and opportunities
- Technological, financial, operational and business requirements
- Views of interested parties

When planning how to achieve the QEHS objectives, management shall determine the actions, resources, responsible personnel, target timelines and how the results will be evaluated, including indicators for monitoring progress toward achievement of objectives.

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Where possible, management will consider how actions to achieve objectives can be integrated into Midland's business processes.

#### 2.4.4 EHS Management Program

The company has established management program(s) for achieving its EHS objectives and targets. The documented management program(s) has included:

- Designated responsibility and authority for achievement of the objectives at relevant functions and levels
- Means and time scale by which the objectives are to be achieved
- The management program(s) is reviewed periodically and during management reviews. Where necessary, the management program(s) are amended to address changes in activities, products, services or operating conditions of the organization.

Reference Document:

Quality, Environment, Health and Safety Policy

Quality, Environment, Health and Safety Objectives and Target Register

Quality, Environment, Health and Safety Management Program

#### 2.4.5 Planning Of Changes

The Director has ensured that resources needed to achieve the quality objectives are identified and planned. The output of the planning has been documented in the QEHS procedures and other supporting quality documentation. Quality planning has included:

- Processes of QEHS
- Resources needed
- Continual Improvement

When there is a need for changes in the QEHSMS, the changes shall be carried out in planned manner and consider the following:

- Purpose of the changes and their potential consequences
- Integrity of the QEHS management system
- Availability of resources
- Allocation and reallocation of responsibilities and authorities

### 2.5 QEHS Administration

#### 2.5.1 Responsibility and Authority

The company has:

- Defined the organization structure and responsibilities & authorities of personnel who perform and verify activities having an effect on the Quality, Environment impacts and OH & S risks
- Documented and communicated the responsibilities & authorities to facilitate effective Quality Environment and OH & S management
- Appointed a Company Representative to manage the QEHSM Systems.

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**Management Representative**

The Director has appointed the Analyst to be the Quality, EHS Management Representative. The Management Representative has ensured the following:

- Ensuring that processes of QEHSMS are established and maintained
- Ensuring that the processes deliver their intended outputs and all the systems conform to respective international standards
- Reporting to top management on Quality and EHS performance and improvement needs or opportunities of QEHSMS
- Promoting awareness of customer focus throughout the organization
- Ensuring integrity of the QEHSMS is maintained with all changes in planned mode and implemented
- 
- Liaison with external parties on matters relating to the QEHSMS

Reference document:  
Operations Manual

**2.5.2 Consultation & Communication**

The company has established procedure for internal and external communication on EHS matters and as may be required by the compliance obligations (Legal/other requirements)

Employees participate and, are consulted on OH & S issues regarding:

- development and review of policies and procedures to manage risks
- any changes that affect workplace health and safety
- health and safety matters
- interaction between the employees and MMOP's QEHSMS representative

Records shall be maintained of employees' involvement and participation and consultation. Interested parties are kept informed of these matters, if required.

Relevant EHS communication matters shall be responded to by assigned personnel.

When establishing EHS related communication processes, management will consider the compliance obligations and ensure that the environmental information is consistent with information gathered within the EHS and is reliable.

Internal and External communications relevant to the QMS/EMS/OHSMS are determined, including What, When, With Whom to communicate, How and Who to communicate.

Internal communication on EHS shall take place among various levels and functions, including changes on the EHS, as appropriate.

Management shall ensure that the internal communication processes enable employees to contribute towards continual improvement, as appropriate.

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Reference Procedure:  
Communication, Participation and Consultation Procedure

### 2.5.3 Quality, Environment, Health & Safety Manual

This Quality, Environment, Health & Safety Manual has been established and maintained that includes the following:

- Scope of QEHSMS, including justification for any exclusion related to QMS only
- Documented procedures or referenced to them
- Description of sequence and interaction of processes
- Being a controlled document

### 2.5.4 Control of Documents, Creating and Updating

A documented procedure has been established to control documents required for the QEHSMS to:

- Approve documents for adequacy prior to issue
- Review, update as necessary and re-approve documents, Control of changes
- Identify document format, author, reference number, current revision status
- Protection (loss of confidentiality, improper use or loss of integrity)
- Ensure that relevant versions of applicable documents at points of use
- Ensure that documents are legible, readily identifiable and retrievable
- Identify and control distribution of external documents
- Identify obsolete documents retained for use
- Control records (a.k.a. documented information) are defined as quality/EHS-related records

Reference Procedure:  
Internal and External Documents Procedures

### 2.5.5 Control Of Quality, Environment, Health & Safety Records

A documented procedure has been established to control quality, environment, health & safety records as follows:

- Provide evidence of conformance and effective operation of QEHSMS
- Prevent unintended alterations
- Identify, store, provide easy retrieval and protection from damage or loss
- Define retention time
- State disposition method

Reference Procedure:  
Documents Control for Contracts, Specifications and Corporate Records  
Control of Quality, Environment, Health & Safety Records

## 2.6 Management Review

The Director shall:

- Review the QEHSMS at least once a year. The review may be for Quality System or EHS system or a combination of all 3 systems, depending on the criticality of the need
- Ensure its continuing suitability, adequacy and effectiveness

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2.6.1 The management review shall include current performance and improvement opportunities related to:

2.6.1.1 The management review inputs shall include consideration of:

- a) The status of actions from previous management reviews;
- b) Changes in:
  - (i) External and internal issues that are relevant to the QEHS management system;
  - (ii) The needs and expectations of interested parties, including compliance obligations;
  - (iii) Its significant EHS aspects / hazards;
  - (iv) Risks and opportunities;
- c) The extent to which QEHS objectives have been achieved;
- d) Information on MMOP's QEHS performance, including trends in:
  - (i) Nonconformities and corrective actions;
  - (ii) Monitoring and measurement results;
  - (iii) Fulfilment of its compliance obligations;
  - (iv) Audit results
- e) Adequacy of resources;
- f) Relevant communication(s) from interested parties, including complaints;
- g) Opportunities for continual improvement

2.6.1.2 The outputs of management review shall include:

- (i) Conclusions on the continuing suitability, adequacy and effectiveness of the QEHS management system;
- (ii) Decisions related to any need for changes to the QEHS management system, including resources;
- (iii) Actions, if needed, when QEHS objectives have not been achieved;
- (iv) Opportunities to improve integration of the QEHS management system with other business processes, if needed;
- (v) Any implications for the strategic direction of MMOP
- (vi) MMOP shall retain documented information as evidence of the results of management reviews.

Records of Management Review shall be maintained.

### 3 Resource Management

#### 3.1 Provision of Resources

The company has determined and provided in a timely manner resources needed:

- to implement and improve the processes of the QEHSMS
- address customer satisfaction
- address QEHS issues

#### 3.2 Resources

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### 3.2.1 Assignment of Personnel

Personnel assigned shall be competent on the basis of applicable:

- education
- training
- skills
- experience

While assigning resources, management will consider the capabilities and constraints (if any) of the internal resources and determine what needs to be obtained from external providers.

#### Monitoring and Measuring Resources:

Not applicable as these activities are carried out by the outsourced Supplier(s) and not by Midland.

### 3.2.2 Training, Awareness and Competency

The company has established procedure to:

- Identify competency needs for personnel that affect the performance and effectiveness of the QEHSM Systems our ability to fulfill compliance obligations.
- Provide training to satisfy needs including the environmental aspects and EMS
- Evaluate effectiveness of training provided
- Ensure employees are aware of their job in relation to the achievement of quality and EHS objectives
- Ensure employees know the importance of QEHS policy and procedures and the requirements of the QEHSMS
- Ensure employees know their contribution in achieving conformance to the QEHS policy and procedures and the requirements of the QEHSMS, including emergency preparedness and response requirements
- Ensure that employees know the EHS consequences, actual or potential, of their work activities and the EHS benefits of improved personal importance
- Ensure that employee know the implications of not conforming with QMS / EHS, including not fulfilling Midland's compliance obligations for EHSMS
- Maintain appropriate records of education, training and qualifications as evidence of competence

### 3.2.3 Organizational Knowledge

The company has established to procedure to determine the necessary knowledge for Midland's operations and to achieve conformity of our products and services.

Details of these are maintained as needed and the extent necessary for Midland.

*Example:*

**Internal Sources:** *through lessons learnt and good practices from projects completed, capturing undocumented knowledge and experience etc.*

**External Sources:** *Standards, Conference/Seminars, knowledge gathered from customers or external providers.*

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When there are significant changing needs and trends, management will consider the current knowledge and determine how to acquire or access new necessary knowledge and updates.

Reference Procedure:

Training, Awareness & Competence Procedure

### **3.2.4 Infrastructure**

The company has identified, provided and maintained infrastructure needed to achieve conformity of product and maintaining an environmentally friendly and safe and healthy working environment:

- workspace and associated facilities
- equipment, hardware and software
- Personal Protective Equipment (PPE) and other relevant health & safety equipment, which will be limited in view of work mainly within the Office premises.
- Supporting services, eg. Information & Communication Technology and transport

### **3.2.5 Work Environment**

The company has Identified and managed work environment well to achieve service/product conformity, environmental friendliness and a safe and workplace for its employees and visitors.

Factors to be considered for suitable work environment may include (as appropriate):

- Social (e.g., non-discriminatory, calm, non-confrontational)
- Psychological (e.g., stress-reducing, burnout-prevention, emotionally-protective)
- Physical (e.g., temperature, heat, humidity, light, airflow, hygiene, noise)

## **4 Product Realization**

### **4.1 Operational Planning and Control**

#### **1. QMS**

Planning of the realization of the provision of the trading business is documented in the established procedures. For new product and service not covered by existing procedures, a Quality plan shall be established to cover the following as appropriate:

- Quality objectives / criteria for the product, processes project or contract
- The need to establish processes and documentation and provide resources and facilities specific to the product
- Verification and validation activities and the criteria of acceptability
- Resources needed to achieve conformity of products and service requirements
- The records that are necessary to provide confidence of conformity of the processes and resulting product
- The Quality plan will serve as output of the planning process.



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## 2. EMS

The management has established, implemented and maintained the processes needed for Midland's EMS and to implement actions identified for Risks and Opportunities and EMS Objectives. The actions shall be implemented by:

- Establishing operating criteria for the processes
- Implementing control of the processes in accordance with the operating criteria

Any planned changes for QMS / EMS shall be controlled. Process owners shall review the consequences of any unintended changes and take suitable actions to mitigate the impacts, if any.

Should there be a need for outsourced processes for QMS or EMS, these shall be controlled. Management will define the type and extent of controls within the system.

### Lifecycle Perspective for EMS

The management will consider every stage of our product lifecycle and identify which stages are within the control of Midland and establish appropriate controls.

Determine the environmental requirements and communicate these to the relevant personnel including external providers / contractors.

Where appropriate, information shall be provided to concerned parties on the potential significant environmental impacts associated with the transportation or delivery.

As Midland is only involved in trading of raw materials and not products, end-of-life treatment and disposal is beyond our control.

Reference Procedure:

Process Control procedure

## 4.2 Customer-Related Processes

### 4.2.1 Determining The Requirements For Products And Services

The company has determined customer requirements through reviews, including:

- Product requirements specified by the customer, including requirements for availability, delivery, support and OHS expectations.
- Product requirements not specified by the customer but necessary for intended or specified use
- Obligations related to product, including regulatory and legal requirements
- Midland can meet the claim for products and services that is offered to customers.

### 4.2.2 Review of Product Requirements

The company shall review identified customer's product requirements together with additional requirements prior to the commitment to supply product/services to the customer and shall ensure that:

- Product requirements are defined
- Where the customer provides no documented statement of requirement, the customer requirements are confirmed before acceptance

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- Contract or order requirements differing from those previously expressed are resolved
- Statutory or regulatory requirements applicable to the products or services
- The company has the ability to meet defined requirements

The results of the review and subsequent follow-up actions including changes are recorded and maintained as evidence.

Where the product requirements are changed, the company shall ensure that relevant documentation is amended and relevant personnel are made aware of the changed requirements.

#### 4.2.3 Customer communication

The company has identified and implemented arrangements for communication with customers relating to:

- Information relating to products and services
- Enquiries, contracts or order handling, including amendments
- Obtaining Customer feedback on products and services, including customer complaints
- Handling or controlling customer property where applicable
- Establishing requirements for contingency plans where relevant.

### 5 Design and/or Development of Products and Services

This is currently not applicable to the company's scope of business as there are no design and development activities.

## 6 Purchasing

### 6.1 Purchasing –General, Type & Extent of Control

#### 1. General

The company has controlled its purchasing processes to ensure purchased product conforms to requirements. The controls to be applied are dependent upon the effect of subsequent processes and their output. Controls are applied when:

- Products and services from external providers (e.g., suppliers / contractors) are intended for incorporation into Midland's own products and services
- Products and services provided directly to the customers by external providers on behalf of Midland.
- A process, or part of a process, is provided by an external provider by Midland's decision.

The company has evaluated and selected suppliers based on their ability to supply product in accordance with requirements. Criteria for evaluation, selection and periodic monitoring have been defined. "Safety" is a new element added to the evaluation form to ascertain vendor safety performance. The results of evaluations and follow-up actions are recorded and retained.

#### 2. Type and Extent of Control

Management will ensure that purchased processes, products and services do not adversely affect Midland's ability to consistently deliver conforming products and services to our customers with a good practice of safety in mind. Towards this, management shall:

- Ensure the suppliers / contractors remain within the control of Midland's QMS

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- Define both the controls that may be applied to the external provider as well as to the resulting output.
- Consider the following:
  - The potential impact of suppliers' processes, products and services on Midland's ability to consistently meet customer and applicable statutory and regulatory requirements.
  - The effectiveness of the controls applied by the suppliers/contractors.
- Determine appropriate verification, or other activities, necessary to ensure that the suppliers' processes, products and services meet our requirements.

## 6.2 Purchasing Information (For External Providers)

Purchasing documents raised by the company shall contain adequate information on the product to be purchased, including where appropriate:

- Requirements for approval or qualification of product, procedures (methods), processes and equipment
- Release of products and services
- Quality management system requirements, other management systems like EMS & OHSMS is only a preference which might gain additional merit in the overall evaluation.
- Competence, including any required qualification of personnel
- Requirements for any interactions with external providers
- Control and monitoring of the suppliers' performance by Midland

The company shall ensure the adequacy of specified requirements contained in the purchasing document prior to their release.

Where the company or our customer proposes to perform verification activities at our supplier's premises, we shall specify the intended verification arrangements and method of product in the purchasing document.

Reference Procedure:

MMOP-CON-01 (Orders and Vendor Selection Procedure)

## 7 Production and Service Operations

### 7.1 Operations Control (QEHS)

The company has controlled production and service operations through:

- The availability of information that specifies the characteristics of the product or service to be provided or the activities to be performed and results to be achieved
- Where necessary, the availability of work instructions
- The use of maintenance of suitable equipment for production and service operations
- The availability and use of measuring and monitoring devices and appointment of competent persons including any required qualification
- The implementation of monitoring and measurement activities at required stages (*to verify that criteria for control of processes or outputs, and acceptance criteria for products and services have been met*)
- Use of suitable infrastructure and environment (where required) for the operations of processes

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- Implementation of actions to prevent human error (where appropriate / practical)
- The implementation of defined processes for release, delivery and applicable post-delivery activities

**Validation of Processes:**

This is not applicable to the company's business. All resultant output can be verified by subsequent inspection activities.

The company has identified those operations that are associated with identified impacts and risks where control measures are needed. The company has planned these activities to ensure that these activities are conducted under specified conditions:

- Maintaining documented procedures to cover those situations, where their deviations could lead to deviations from the EHS policy and objectives
- Stipulating operating criteria in the procedures
- Maintaining procedures related to the identified EHS risks of materials, equipment and services purchased or used by the company and communicating the relevant procedures and requirements to suppliers
- Maintaining procedures for workplace health and safety, process, and operating procedures and work organization, including human factors adaptation, in order to eliminate or reduce EHS risks at source.

Reference Procedure:

Operations Control procedures, where relevant to enforce control measures

**7.2 Emergency Preparedness and Response**

The company has established procedure to identify the potential for and responses to incidents and emergency situations and for preventing and mitigating the likely environmental pollution, illness and injury that may be associated with them.

This includes the risks and opportunities as identified by Midland.

The company shall review its emergency preparedness and response plans, in particular after the occurrence of incidents and emergency situations.

Take actions to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and potential environmental impacts.

The company has periodically tested the emergency plans where practicable.

Management shall provide relevant information and training related to emergency preparedness and response, as appropriate to interested parties including persons working under Midland's control.

The MR shall maintain records related to the emergency preparedness and response.

Note: MMOP is a tenant of the building. The landlord will schedule and conduct the periodic fire drill with MMOP staff following the evacuation practice, as planned.

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Reference Procedure:  
Emergency Preparedness and Response

### 7.3 Identification and Traceability

The company has identified, where appropriate, the outputs (product/service) by suitable means throughout production and service operations.

The company has identified the status of product/service with respect to measurement and monitoring requirements.

The company has controlled and recorded the unique identification of the product, where traceability is a requirement. Records shall be retained for traceability.

Reference Procedure:  
QEHS Operations Manual

### 7.4 Customer Property

Not Applicable. We do not have Customer Property in our custody.

### 7.5 Preservation of Product

The company shall preserve (to necessary extent) conformity of the outputs with customer requirements during internal processing and delivery to the intended destination. This shall include identification, handling, contamination control, packaging, storage, transportation and protection.

#### Post-Delivery Activities:

Warranty is given to customers on the products supplied by Midland as per contract terms

### 7.6 Control of Changes

Process owners shall review and control changes for production or service provision, to necessary extent to ensure continuing conformity with requirements.

### 7.7 Control of Measuring and Monitoring Devices

Not Applicable. There are no measuring and monitoring devices used by the company.

## 8 Performance Evaluation and Improvement

### 8.1 General

The company has defined, planned and implemented:

- What are the identified parameters that need to be monitored and measured by Midland
- Methods for monitoring, measurement, analysis and evaluation needed to ensure valid results
- When the monitoring and measuring shall be performed
- When the results from such monitoring and measurement shall be analyzed and evaluated, the measured and monitored activities will be assessed for conformity, and could offer new improvement topic.
- This evaluation exercise of the QEHSMS performance is conducted annually

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Information on QEHS performance shall be communicated internally and externally as identified in the communication processes and as required by compliance obligations.

Records of performance evaluation are maintained as evidence.

No statistical techniques are currently used for the measurement and monitoring activities.

## 8.2 Measurement and Monitoring

### 8.2.1 Customer Satisfaction

The company shall monitor information on customer satisfaction and/or dissatisfaction as one of the performance of the QMS to assess their perception of the degree to which their needs and expectations have been fulfilled. The methodology for obtaining, monitoring and reviewing this information has been determined.

### 8.2.1 Evaluation of compliance

MMOP has established, implemented and maintained the process(es) required to evaluate fulfillment of its compliance obligations to legal requirements.

Midland shall:

- a) Determine the frequency that compliance evaluation exercise
- b) Evaluate if identified EHS legal & other requirements have been fulfilled
- c) Record the compliance status for the applicable legal requirements
- d) Corrective action will be raised for any non-compliance in a timely manner

MMOP shall retain documented information as evidence of the compliance evaluation result(s).

Reference procedure:  
Operations Manual

### 8.2.2 Analysis and evaluation

MMOP shall analyze and evaluate appropriate data and information arising from monitoring and measurement.

The results of analysis shall be used to evaluate:

- a) Conformity of products and services;
- b) The degree of customer satisfaction;
- c) The performance and effectiveness of the QEHS management system;
- d) If planning has been implemented effectively ;
- e) The effectiveness of actions taken to address risks and opportunities;
- f) The performance of external providers;
- g) The need for improvements to the QEHS management system.

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### 8.2.3 Internal Audit

The company shall conduct periodic internal audits to determine whether the QEHS:

- Conforms to the requirements of ISO 9000, ISO 14001 and ISO 45001
- Conforms to the requirements of Midland's QEHS System
- Has been effectively implemented and maintained
- Is effective in meeting QEHS policy and objectives

The company shall plan the audit program taking into consideration the status and importance of the processes and results of environmental impact and risk assessments, changes affecting Midland as well as the results of previous audits. The audit scope, criteria, frequency and methodologies and competencies has been defined. Audits shall be conducted by personnel independent of the activity or process being audited.

A documented procedure has been implemented which includes the responsibilities and requirements for conducting audits, ensuring their independence, recording results and reporting to management.

Management shall take timely corrective actions on deficiencies found during the audit.

Follow-up actions shall include the verification of the implementation of corrective action and the reporting of verification results.

Records shall be maintained as evidence of internal audit and actions if any.

Reference Procedure:  
Internal Audit procedure

### 8.2.4 Measurement And Monitoring Of Processes

The company has applied suitable methods for measurement and monitoring of those realization processes necessary to meet customer requirements. These methods shall confirm the continuing ability of each process to satisfy its intended purposes.

### 8.2.5 Measurement and Monitoring of Product (Release of Products and Services)

The company has measured and monitored the characteristics of the product to verify that requirements for the product are met. This has been carried out at appropriate stages of the product realization process.

Evidence of conformity with the acceptance criteria are documented in suitable form. Records that indicate the evidence of conformity and authority responsible for release of product are maintained.

Product release and service delivery will not proceed until all the specified activities are satisfactorily completed, unless otherwise approved by a relevant authority and, as applicable, by the customer.

Reference procedure:  
Operations Manual

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### 8.2.6 EHS Performance Measurement and Monitoring

The company has established and maintained procedures for the monitoring and measurement of EHS performance on a regular basis. These procedures have provided for:

- appropriate qualitative and quantitative measures
- monitoring of achievement of the EHS objectives
- proactive measures of performance that monitor compliance with the EHS management programme, operational criteria and applicable legal and other compliance requirements and take actions if required
- maintain knowledge and understanding on our compliance status
- reactive measures of performance to monitor accidents, ill health, incidents
- recording the data and results of monitoring and measurement sufficient to facilitate subsequent corrective action analysis

Reference Procedure:

Performance Measurement & Monitoring Procedure

### 8.3 Control of Nonconforming Product

The company has ensured that product which does not conform to requirements are identified and controlled to prevent unintended use or delivery. These activities are defined in a documented procedure.

Appropriate actions will be initiated based on the nature of the nonconformity and its effect on the conformity of products and services. Actions could be:

- Correction from systemic error
- Segregation, containment, return or suspension of products or services provision
- Discrepant information released to customer
- Obtaining authorisation for acceptance under concession

When Nonconforming output are corrected it will be subjected to re-verification after correction to demonstrate conformity.

When nonconforming product is detected after delivery or use has started, the company shall take appropriate action regarding the consequences of the nonconformity.

When required by customer, the proposed rectification of nonconforming product shall be reported for concession to the customer or relevant interested party.

Records shall be maintained that describe the nonconformity, actions taken, concessions obtained (if any) and identify of the authority deciding action for nonconformity.

Reference Procedure:

Control of Nonconforming Product Procedure

### 8.4 Analysis and Evaluation

The company shall collect and analyze appropriate data from monitoring and measurement to determine the suitability and effectiveness of the QEHS and to identify improvements. This includes the following:



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- Conformity of products and services
- Degree of Customer satisfaction
- Performance and effectiveness of the QEHS
- If planning had been implemented effectively
- Effectiveness of actions taken to address risks and opportunities
- Performance of external providers (Suppliers / contractors)
- Need for improvements to the QEHS

## 8.5 Improvement

### 8.5.1 Planning for Continual Improvement

The company has planned and managed the processes necessary to continually improve the suitability, adequacy and effectiveness of the QEHSMS.

The company has facilitated the continual improvement of the QEHSMS through the use of the Quality, Environment, Health & Safety policy, objectives, audit results, analysis of data, corrective action and the management review

### 8.5.2 Incidents, Nonconformities, Corrective Action

The company shall take corrective action to eliminate the cause of QEHS nonconformities or accidents or incidents in order to prevent recurrence. Corrective actions taken shall be appropriate to the significance of the effects of nonconformities encountered, including the environmental impact and OHS hazard..

A documented procedure has been established that defines the requirements for:

- Handling and investigation of EHS accidents, incidents and non-conformances
- Taking action to mitigate any adverse consequences arising from nonconformities, accidents and incidents
- Determining the causes of nonconformities, accidents and incidents
- Determining if similar nonconformities exist, or could potentially occur
- Evaluating the need for actions to ensure that nonconformity, accident and incident do not recur
- Determining and implementing the corrective action needed
- The proposed action shall be reviewed through the risk assessment process prior to implementation
- Recording results of action taken
- Reviewing the effectiveness of corrective action taken
- Update risks and opportunities determined during planning, if necessary
- Make changes to the QEHS system if necessary

Records shall be maintained for the nonconformities, actions taken and results of any corrective action.

Reference procedure:

Incidents, Nonconformities Corrective Action procedure

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### 8.5.3 Corrective Action

The company shall identify corrective and preventive action to eliminate the causes of product nonconformities to prevent recurrence or occurrence respectively. Corrective and Preventive actions taken shall be appropriate to the impact of the potential problems encountered.

A documented procedure for corrective and preventive action has been established to define the requirements for:

- Identifying nonconformities/potential product nonconformities
- Determining and ensuring the implementation of corrective action needed
- Recording results of action taken
- Reviewing of effectiveness of corrective action

Reference procedure:

Corrective and Preventive Action procedure

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Cross-Reference between ISO Standards and Midland QEHSMS Manual  
(ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018)

ISO Sec	ISO Section Title	QEHS Manual	QEHS Manual Section Title
<b>4</b>	<b>CONTEXT OF THE ORGANIZATION</b>		
4.1	Organization & its Context	1.1	General Requirements
4.2	Needs and Expectations of Interested Parties	1.2	General Documentation Requirements
4.3	Scope of the QMS / EMS	1.3	Scope and Permissible Exclusions
4.4	QMS and its Processes / EMS	1.3	Scope and Permissible Exclusions
<b>5</b>	<b>LEADERSHIP</b>		
5.1	Leadership and Commitment	2.1	Management Commitment
5.1.1/2	General / Customer Focus	2.2	Customer Focus
5.2	Policy / Environmental Policy	2.3	QEHS Policy
5.2.1/2	Establishing / Communicating Quality Policy	2.3	QEHS Policy
5.3	Roles, Responsibilities, Authorities	2.5.1	Responsibility and Authority
<b>6</b>	<b>PLANNING</b>		
6.1	Actions to address Risks & Opportunities	2.4.3	Planning for Env Asp/Imp, HIRA
6.1.2	Environmental Aspects	2.4.1	Planning for Env Aspects/ Impacts
6.1.3	Compliance Obligations	2.4.3	Legal and Other Requirements
6.1.4	Planning Action	2.4.1	Planning for Env Asp/Imp, HIRA
6.2	Q/E Objectives & Planning to Achieve Them	2.4.3	Achievement of QEHS Objectives
6.2.1	Environmental Objectives		
6.2.2	Planning Actions to Achieve Env Objectives		
6.3	Planning of Changes	2.4.4	Quality Planning
<b>7</b>	<b>SUPPORT</b>		
7.1	Resources	3.2	Resources
7.1.2/3	People / Infrastructure	3.2.1, 3.2.2/3	Assignment of Personnel / Training, Awareness, Comp / Infrastructure
7.1.4	Environment for the operation of processes	3.2.4	Work Environment
7.1.5	Monitoring and Measuring Resources	7.7	EXCLUSION
7.1.6	Organizational Knowledge	3.2.2	Training, Awareness, Competency
7.2	Competence	3.2.2	"—"
7.3	Awareness	3.2.2	"—"
7.4	Communication	2.5.3	Consultation & Communication
7.4.2/3	Internal / External Communication	2.5.3	Consultation & Communication
7.5	Documented Information	2.5.5 2.5.6	Control of Documents Control of QEHS Records
7.5.2/3	Creating & Updating / Control of Doc Infor	2.5.5	Control of Documents
<b>8</b>	<b>OPERATION</b>		
8.1	Operational Planning and Control	4.1	Planning of Realization Processes
8.2	Requirements for Products and Services		Title only
8.2	Emergency Preparedness and Response	7.2	Emergency Preparedness & Response
8.2.1	Customer Communication	4.2.3	Customer Communication
8.2.2	Determining the Reqmts for Products & Service	4.2.1	Identification of Cust Requirements
8.2.3	Review of Reqmts for Products & Services	4.2.2	Review of Product Requirements
8.2.4	Changes to Reqmts of Products & Services	4.2.2	Review of Product Requirements
8.3	Design & Development of Prod & Services	5.0	EXCLUSION

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ISO Sec	ISO Section Title	QEHS Manual	QEHS Manual Section Title
8.4	Control of Externally provided Prod & Services	6.0	Purchasing (Title only)
8.4.1	General	6.1	Purchasing Control
8.4.2	Type and Extent of Control	6.1	Purchasing Control
8.4.3	Information for External Providers	6.2	Purchasing Information
8.5	Production and Service Provision (Title)	7.0	Production and Service Provision (Title)
8.5.1	Control of Production & Service Provision	7.1	Operations Control (QEHS)
8.5.2	Identification and Traceability	7.3	Identification and Traceability
8.5.3	Property belonging to Cust & Ext Providers	7.4	EXCLUSION
8.5.4	Preservation	7.5	Preservation of Product
8.5.5	Post-Delivery Activities	7.5	Preservation of Product
8.5.6	Control of Changes	7.6	Control of Changes
8.6	Release of Products and Services	8.2.4	Measurement & Monitoring of Products
8.7	Control of Nonconforming Outputs	8.3	Control of Nonconforming Product
<b>9</b>	<b>PERFORMANCE EVALUATION</b>		
9.1	Monitoring, Measure, Analysis & Evaluation	8.0	Measurement, Analysis and Imp
9.1.1	General	8.1	General
9.1.2	Customer Satisfaction	8.2.1	Customer Satisfaction
9.1.2	Evaluation of Compliance	8.2.2	Evaluation of Compliance
9.1.3	Analysis and Evaluation	8.4	Analysis of Data
9.2	Internal Audit	8.2.3	Internal Audit
9.2.2	Internal Audit Programme	8.2.3	Internal Audit
9.3	Management Review	2.6	Management Review
<b>10</b>	<b>IMPROVEMENT</b>		
10.2	Nonconformity and Corrective Action	8.5.2 8.5.3	Incidents, Nonconformities, Corrective and Preventive Action
10.3	Continual Improvement	8.5.1	Planning for Continual Imp

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### Appendix 1: Documents Linkage Table

ISO 9001 Clause	ISO 14001 Clause	ISO 45001 :2018 Clauses	Document	Document Number
4.0/ 4.1/5.2/5.3/ 5.4/5.6/6.0/ 7.0/8.0	4.0/ 4.1/4.6	4 – 10 and sub-clauses	OEHS Manual	MMOP-MAN-01
Nil	Nil	Nil	Accounting Department Procedure	MMOP-ACC-01
4.2	4.4.4/5	7.5	Document Control for Contracts, Specifications and Corporate Records	MMOP-ADM-01
4.2/ 6.0/ 6.1	4.4.4/5		Office Procedures	MMOP-ADM-02
6.2	4.4.2	7.2, 7.3, 7.4	Training, Awareness and Competence Procedure	MMOP-ADM-03
7.4	Nil	8.1.4	Orders and Vendor Selection Procedure	MMOP-CON-01
7.0/7.1	Nil	Nil	Contract Administration Procedure	MMOP-CON-02
5.4	4.3.3	6.2.1, 6.2.2	QEHS Objectives, Targets and Programs	MMOP-ISO-01
5.0/ 5.1/ 5.5	4.4.1	5.3	Roles, Responsibilities, Accountability & Authority	MMOP-ISO-02
5.5	4.4.1	5.3	Organization Structure	MMOP-ISO-02
4.1	4.0	Nil	Sequence & Interaction Of Processes	MMOP-ISO-02
4.2.4	4.5.4	7.5	QEHS Records Procedure	MMOP-ISO-03
8.2	4.5.3	9.2	Internal Audit Procedure	MMOP-ISO-04
Nil	4.3.1	8.1.2	Hazard Identification, Risk Assessment and Determining Controls	MMOP-ISO-05
Nil	4.3.2	6.1.3, 9.1.2	Legal and Other Requirements Procedure	MMOP-ISO-06
5.5	4.4.3	5.4, 7.4	Communications, Participation and Consultation Procedure	MMOP-ISO-07
Nil	4.4.7	8.2	Emergency Preparedness and Response Procedure	MMOP-ISO-08
Nil	4.4.6	Nil	Environmental Aspects Identification Procedure	MMOP-ISO-10
Nil	4.4.6	Nil	Guidelines for Energy Saving	MMOP-ISO-11
Nil	4.4.6	Nil	Guidelines for Paper Reuse	MMOP-ISO-12
7.2	Nil	Nil	Marketing Department Procedure	MMOP-MKT-01
7.2	4.4.6	8.1	Guidelines For Factory & Site Visits	MMOP-MKT-02
4.2	4.4.4/5	7.5	Internal and External Document Control Procedures	MMOP-QUA-01
8.3	Nil	Nil	Control of Non-Conforming Product Procedure	MMOP-QUA-02
8.3	4.5.2	10.2	Corrective and Preventive Action	MMOP-QUA-03
8.3	4.5.2	10.2	Incidents, Nonconformities, Corrective Action Procedure	MMOP-QUA-04
8.4	4.5.1	9.1	Performance Measurement and Monitoring Procedure	MMOP-ISO-09
7.0	Nil	Nil	Quality Assurance Procedure	MMOP-QUA-05
7.0	Nil	Nil	Traffic Procedure	MMOP-TRA-01