



Business Management System Overview

Sustainability

Contents

1. Introduction
2. Overview of the Company
3. Environmental Objectives
4. Context of the Organisation
5. Leadership
6. Planning
7. Support
8. Operation
9. Performance Evaluation
- 10.Improvement

Signed.....

Managing Director

Date: 28 March 2024

1. INTRODUCTION

This document is the Business Management Manual (the Manual) of Marillo Foods Limited (MFL) and for the purpose of this manual will be referred to as 'Business Management System Overview'.

The Manual is the property of MFL and is a controlled document.

The purpose of the Manual is to provide an overview of the Business Management System for MFL, the activities it carries out and the environmental standards of operation it conforms to.

It is not designed to act as a procedures manual, although it does carry information about where procedures information is located and the detailed information on documentation requirements for the procedures required by the respective standards.

This Manual is designed to meet the requirements of ISO14001:2015.

1.1 THE ISSUE STATUS

The issue status is indicated by the version number in the footer of this document. It identifies the issue status of this Manual.

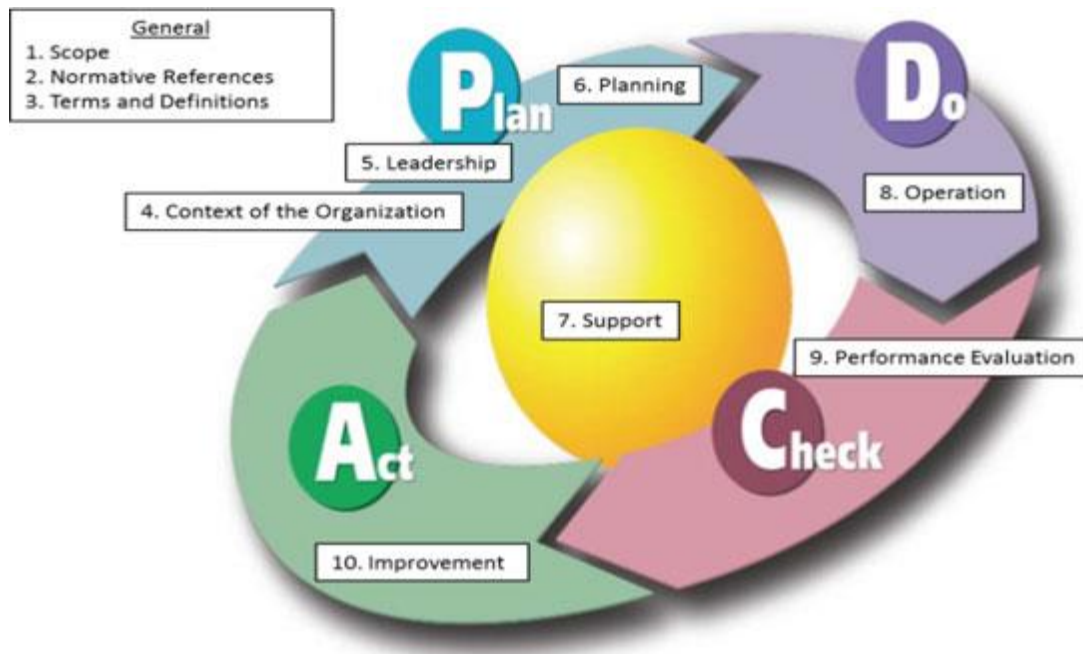
When any part of this Manual is amended, a record is made in the Amendment Log shown below.

The Manual can be fully revised and re-issued at the discretion of the Management Team.

Please note that this Manual is only valid on the day of printing.

| Issue | Issue Date | Additions/Alterations | Initials |
|-------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| 2/1 | 10/04/2021 | Business Management System Manual First Authorised Issue | MJP/JP |
| 2/2 | 29/04/2021 | 2.1 scope of registration has been changed as recommended in the BAB Stage 2 Audit. Section 10 has been amended to include the newly created Non-Conformance & Corrective Action Log | MJP/JP |
| 2/3 | 29/03/2022 | 9.2 internal audits take place in line per a rolling programme, rather than an annual basis following the year-end close. The hyperlinks have been updated to reflect where the 2022 files are saved. | MJP/JP |
| 2/4 | 29/03/2023 | MFL no longer subscribe to formal accreditation in terms of ISO 14001:2015 but continue the same processes and system to ensure that MFL still complies with the requirements of the standard | MJP/JP |
| 2/5 | 28/03/2024 | Document reviewed to ensure compliance | MJP/JP |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

1.2 PLAN-DO-CHECK-ACT Model for ISO 14001:2015



1.3 ENVIRONMENTAL POLICY

It is the policy of MFL to maintain an environmental system designed to meet the requirements of ISO14001:2015 in pursuit of its primary objectives, the purpose and the context of the organisation.

A copy of the Environmental Policy can be found under the following file path and is available in hard copy to all interested parties on request:

[W:\Technical\ISO 14001\2024\Environment Management\MFL Environmental Policy \(006\).doc](W:\Technical\ISO 14001\2024\Environment Management\MFL Environmental Policy (006).doc)

This policy provides a framework for setting, monitoring, reviewing and achieving our objectives, programmes and targets.

Customer service is an essential part of the environmental process and to ensure this is fulfilled, all employees receive training to ensure awareness and understanding of the environment and its impact of the products or service in which we provide.

To ensure the company maintains its awareness for continuous improvement, the environmental system is regularly reviewed by the Directors of MFL to ensure it remains appropriate and suitable to the business. The Environmental System is subject to both internal and external annual audits.

2. OVERVIEW OF THE COMPANY

MFL, established in 2003, is a leading importer and distributor of canned foods, oils, pasta and dried fruit to the food service and manufacturing sectors.

MFL provide an extensive, high quality range of over 100 products from canned fruit to olives, pickles to canned vegetables, fish to meat and pasta.

MFL is dedicated to supplying the best products and providing high quality, locally focused service to all customers.

The key aims and objectives can be summarised as follows:

- To be a leading UK food importer
- To maintain longevity in a competitive market
- To build and maintain a sustainable future

2.1 SCOPE OF REGISTRATION

The scope of ISO 14001 has been defined as Importers and distributors of canned foods, pasta, oils and dried fruit for the foodservice and manufacturing sectors within the UK.

3. ENVIRONMENTAL OBJECTIVES

We aim to provide a professional and ethical service to our customers. In order to demonstrate our intentions, the Directors will analyse customer feedback data, internal performance data, external environmental performance, financial performance data and business performance data to ensure that our Environmental Objectives are being met.

We have identified the following Environmental Objectives within the Environmental Policy which can be found under the following file path and is available in hard copy to all interested parties on request:

[W:\Technical\ISO 14001\2024\Environment Management\MFL Environmental Policy \(006\).doc](W:\Technical\ISO 14001\2024\Environment Management\MFL Environmental Policy (006).doc)

Whilst the company objectives are “high-level”, we have further analysed and categorised these within the following document:

[W:\Technical\ISO 14001\2024\Business Management System\MFL Aims & Objectives \(004\).xlsx](W:\Technical\ISO 14001\2024\Business Management System\MFL Aims & Objectives (004).xlsx)

In some cases, this may allow for specific objectives being set across different functions. This shows how we measure and set targets in meeting the “high level” objectives.

4. CONTEXT OF THE ORGANISATION

4.1 Understanding the organisation and its context

The context of the organisation is demonstrated within this Business Management System and all associated processes connected with the services/products offered. The legal legislation/regulatory compliance to the service/products offered are listed within the MFL Legal Register. The Register also captures how MFL evaluates legal compliance and ensures the requirements are monitored and met. The document can be found stored under the following file path:

[W:\Technical\ISO 14001\2024\Compliance\MFL Legal Register \(019\).xlsx](W:\Technical\ISO 14001\2024\Compliance\MFL Legal Register (019).xlsx)

4.2 Understanding the needs and expectation of interested parties

| Interested Parties | Information Requirements |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Directors / Shareholders | Ensure that the business continues to function in a profitable manner without hindrance and bureaucracy; meeting its adopted aims and objectives. Risk-based strategic decision-making to benefit operations and good market sector knowledge. |
| Employees | Information required to conduct duties to the required standard (including role and responsibilities), training on policies and procedures, regular briefings on operational activities, aims and objectives. There is no Union agreement as only a small workforce. Reassurance of a safe working environment and competent leadership. |
| Contractors | Briefed by staff when arriving on-site on relevant policies and procedures. Information required for the work contracted and reassurance of a safe place to conduct the work. |
| Suppliers / Customers | Information required for trading purposes and to maintain good working relationships. Clear dialogue and good payment terms. |
| Accountants / Other professional advisors | Information to enable the audit of the draft financial statements, produce tax returns and provide professional advice as needed. Specific details pertaining to the area where advice is required. Professional dialogue and engagement in a timely manner. |
| Governing Bodies / Regulatory Bodies | Requirements to satisfy legislation, submissions, audits and other requirements; including access to all data required. Advance planning and scheduling of audits and positive engagement. |

4.3 Determining the scope of the environmental management system

The scope of the system covers all the core and supporting activities of the company. The activities and arrangements of all personnel including any sub-contractors also fall within the scope of the system.

4.4 Environmental Management system and its processes

MFL is responsible for the planning and delivery of its services. We work closely with our partner suppliers and customers to satisfy mutual requirements. The core processes and their interaction is shown below:

Environmental Policy → Planning & Setting of Objectives → Resources & Awareness Training → Communication → Improvements → Documentation & Control → Emergency Planning → Monitoring & Measurement → Audit & Management Review → Plans for Continuous Improvement

5 LEADERSHIP

5.1 Leadership & Commitment

MFL's Directors are committed to the development and implementation of an Environmental Policy and the Environmental Management System which are both compatible with the strategic direction and the context of the company; the whole system is frequently reviewed to ensure conformance to the standard. Responsibility has been assigned to ensure that the BMS conforms to the requirements of the respective standard and the provision to report on performance to the Directors has been defined.

The designated Senior Management Representative(s) will ensure that MFL's staff are aware of the importance of meeting customer and supplier, as well as statutory and regulatory requirements, and overall, to contribute to achieving MFL's Environmental Policy and Objectives which are aligned with the overall Strategic Plan.

The Directors are responsible for implementing the BMS and ensuring the system is understood and complied with at all levels of the organisation.

In summary, the Directors will ensure that:

5.1 Leadership and Commitment for the Environmental Management System

- The company has a designated Director (Finance Director) who is responsible for the maintenance and review of the Environmental Management Systems.
- The ongoing activities of MFL are reviewed regularly and any required corrective action is adequately implemented and reviewed to establish an effective preventative process.
- Measurement of our performance against our declared Environmental Objectives is undertaken.
- Resources needed for the BMS are available and employees have the necessary direction and support, training, skills and equipment to effectively carry out their work.
- Internal audits/Management Reviews are conducted regularly to review progress and assist in the improvement of processes and procedures.
- Objectives are reviewed and, if necessary amended, at regular Review meetings and the performance communicated to all staff.
- The BMS is integrated into the organisations' business processes to ensure that the environmental management system achieves its intended outcomes.
- Communication covering the importance of the effective BMS and conformance to the BMS requirements is in place.
- Continual improvement is promoted.
- The contribution of persons involved in the effectiveness of the BMS is achieved by engaging, directing and supporting staff within their area of responsibility.

5.2 Environmental Policy

The location of MFL's Environmental Policy is noted within section 1.3 of this Manual.

5.3 Organisational Roles, Responsibilities and Authorities

Employee job descriptions together with the requisite skills and experience required for those roles are stored within the MFL Procedures document stored under the following file path:

Recruitment to any vacancies, in line with the essential competences, ensures that the appropriate personnel are in place to cover the whole context of the organisation and strategy of the business.

[W:\Technical\ISO 14001\2024\MFL STS Procedures Manual\MFL STS Procedures Manual \(032\).docx](W:\Technical\ISO 14001\2024\MFL STS Procedures Manual\MFL STS Procedures Manual (032).docx)

6 PLANNING

6.1.1 Actions to address Risk and Opportunities

We have identified the risks and opportunities that are relevant to our Business Management System from an operational perspective. The Risks & Opportunities Register is separate to this Manual. Within each of the areas, potential risks are identified together with a rating as to the importance of the risk. The associated consequence & mitigation of the risk is also noted together with any new opportunities that we have identified.

The Risks & Opportunities Register is stored under the following file path:

[W:\Technical\ISO 14001\2024\Business Management System\MFL Risks & Opportunities Register \(005\).xlsx](W:\Technical\ISO 14001\2024\Business Management System\MFL Risks & Opportunities Register (005).xlsx)

6.1.2 Environmental Aspects

MFL has conducted a review based on existing activities, new or modified activities, products or services to identify and evaluate aspects, impacts and risk connected to its business operation. Any improvement have been identified as part of that review. The review included people, activities, buildings, services and the scope of the Business Management System.

The review of the environmental aspects is undertaken by Directors at regular intervals to ensure they are valid. The information is included in the following documentation under the noted file paths:

[W:\Technical\ISO 14001\2024\Environment Management\MFL Environmental Aspects Register \(current activity impact\) \(007\).xlsx](W:\Technical\ISO 14001\2024\Environment Management\MFL Environmental Aspects Register (current activity impact) (007).xlsx)

[W:\Technical\ISO 14001\2024\Environment Management\MFL Environmental Improvements to Date \(008\).docx](W:\Technical\ISO 14001\2024\Environment Management\MFL Environmental Improvements to Date (008).docx)

6.1.3 Compliance Obligations

MFL has determined compliance obligations which are connected to the operation of our business by initially utilising the British Assessment Bureau Activ software (legal compliance manager) and by keeping up with current legislation and responsibilities. The details, requirements and the company's assessment of whether the obligations are being met are contained within the Legal Register. The document is reviewed by the Directors at regular reviews and any actions required are noted on the Improvement Log for follow up.

The Legal Register is stored within the following file path:

[W:\Technical\ISO 14001\2024\Compliance\MFL Legal Register \(019\).xlsx](W:\Technical\ISO 14001\2024\Compliance\MFL Legal Register (019).xlsx)

6.1.4 Planning Action

MFL takes actions to address its significant environmental aspects, compliance obligations and risks and opportunities in the documents noted in the following sections of this Manual:

- a) 6.1.1 Actions to Address Risks & Opportunities
- b) 6.1.2 Environmental Aspects
- c) 6.1.3 Compliance Obligations

6.2.1 Environmental Objectives and planning to achieve them

The Directors will determine environmental objectives & targets based on the identified significant aspects. This will be carried out initially and then repeated each year as part of our Management Review. Objectives & targets will be measurable where possible and will be consistent with our commitment to prevent pollution, our commitment to comply with compliance obligations as necessary and to ensure we achieve continuous improvement. When determining objectives & targets, considerations will include, technological options, financial, operational & business requirements together with the views of interested parties. On completion of determining the objectives & targets they will be recorded within our matrix and will then be used to develop the programme for implementing actions designed to ensure the individual targets are met and the overall objectives achieved. Environmental Objectives (high level) and methods of achieving the objectives is highlighted within section 3 of this Manual – Environmental Objectives.

6.2.2 Planning Actions to achieve environmental objectives

Directors regularly review environmental objectives, which are contained within our objectives policy together with our aspects & improvements registers. Please see section 3 and section 6.1.2 of this Business Management system.

Specific actions planned are noted on the Improvement Log to make sure all action points are captured in one place, allocated a responsible person, RAG rating and a timeframe for completion.

7 SUPPORT

7.1 Resources

MFL determines and provides the resources needed for the establishment, implementation, maintenance and continual improvement of the environmental management system.

We ensure that the below elements are taken into account when completing an evaluation:

- The capabilities of, and constraints on, existing internal resources;
- What needs to be obtained from external providers

7.2 Competence

All employees have the training and skills needed to meet their job requirements. All employees are monitored on an ongoing basis to identify any training and development needs. Competences and training needs are identified and satisfied by using:

- Job descriptions which set out the competences required
- Contracts of employment which set out contractual and legal requirements
- Induction process and checklist
- Appraisal reviews to monitor performance
- On the job reviews to ensure and check levels of competence

7.3 Awareness

We ensure that all employees are aware of all policies and their contribution to the effectiveness of the Environmental Management System through:

- Communication and regular meetings
- Policies and Procedures
- Awareness Training
- Induction
- CPD

7.4 Communication

Due to the size of the company (two Directors and four part-time employees) most communication is via informal dialogue. However, in addition regular team meetings are held and staff are aware of where policies and procedures are stored on the network drives.

External communication is managed mainly via email but meetings are also arranged by using zoom or travelling to see a supplier and/or customer.

MFL operates in a very open and inclusive office environment and staff are actively encouraged to communicate ideas, problems and suggested solutions in a welcoming forum.

7.5 Documented Information

7.5.1 General

MFL demonstrates documented compliance to ISO 14001:2015 through this Business Management System Manual, which includes processes & procedures. Information is available via request from one of the Directors and is stored in a lever-arch file for all employees to obtain. In addition, the relevant documentation is provided as part of the training and awareness programme.

7.5.2 Creating and Updating

The creation of documentation to support the Business Management System is primarily the responsibility of the Finance Director fully supported by the Managing Director in maintaining and disseminating the processes.

7.5.3 Control of documented information

All documentation is controlled by version and date and is listed on a Document Review Date Table (this also provides a master list). The Control of Documented Information Procedures explains the processes that should be followed. This Policy and the table can be found stored under the following file paths:

[W:\Technical\ISO 14001\2024\Document Control\MFL Control of Documented Information Procedure \(017\).docx](W:\Technical\ISO 14001\2024\Document Control\MFL Control of Documented Information Procedure (017).docx)

[W:\Technical\ISO 14001\2024\Document Control\MFL Document Review Date Table \(018\).docx](W:\Technical\ISO 14001\2024\Document Control\MFL Document Review Date Table (018).docx)

8 OPERATION

8.1 Operational Planning and Control

MFL has determined the requirements and controls implemented for all processes detailed in section 4.4. We have processes in place to ensure that we mitigate any adverse effects within the products or services we provide.

Throughout the Management System controls are in place to ensure operations are reviewed to ensure best-practice and recommendations are explored to see whether implementation is viable. Each step is captured and any actions are noted on the Improvement Log. Compliance, reviews and audits ratify the processes and also give rise to recommendations for improvement.

Registers have been prepared which highlight current practice and aid in running an effective and efficient system. MFL are also subject to a Food Safety System audit each year which provides a mechanism to gain assurance on customer, supplier and logistical aspects of the business.

Relevant documentation to assist with MFL's operational planning and control are stored within the following file path:

<W:\\Technical\\ISO 14001\\2024\\Operational Planning & Control>

The folder includes an Approved Supplier Register, Vulnerability (supplier risk rating), Equipment and Maintenance Register, Waste Management Register. The MFL Procedures Manual also stipulates how operational activities are conducted (including the system of monitoring and control). This can be found stored in the following file path:

[W:\\Technical\\ISO 14001\\2024\\MFL STS Procedures Manual\\MFL STS Procedures Manual \(032\).docx](W:\\Technical\\ISO 14001\\2024\\MFL STS Procedures Manual\\MFL STS Procedures Manual (032).docx)

8.2 Emergency Preparedness and Response

MFL have established, implemented and maintained processes to prepare for emergency situation and to respond if they occur. The below are aspects of performing the organisations functions in an emergency:

- Maintain plans for preventing the emergency
- Maintain plans for reducing, controlling or mitigating its effects and;
- Maintain plan for taking other action in connection with the emergency

The plans and associated documents include:

- Business Continuity Plan
- Crisis Notebook
- Emergency Plan
- Emergency Drill Report
- Health & Safety, No Smoking and COVID-19 Policies
- Fire Evacuation, Accident and Spillage Procedure

The documentation is stored in the following file path:

<W:\\Technical\\ISO 14001\\2024\\Emergency Preparedness & Response>

9 PERFORMANCE EVALUATION

9.1 Monitoring, Measurement, Analysis and Evaluation

Monitoring is based on Risk and is linked to the Risks & Opportunities Register referred to in section 6.1.1 of this Manual.

9.1.1 General

MFL has deemed the following elements (9.1.2, 9.2 & 9.3) for monitoring, measuring, analysis & evaluation to ensure the environmental performance and the effectiveness of the environmental management system.

9.1.2 Evaluation of Compliance

MFL ensures that compliance is reviewed regularly to ensure the business is meeting compliance obligations. This can be seen in section 4.1 of this Business Management System.

9.2 Internal Audit

An internal audit schedule is prepared on an annual basis year and covers the requirements of any ISO standards in which MFL wish to be certified. Internal audits are carried out through “risk or claused based” auditing and are scheduled to take place per a rolling programme; ensuring all areas are reviewed on a timely basis.

Appropriate personnel are allocated to complete the internal audits and must record appropriate evidence for completeness. All audits completed must be authorised by the Managing Director as complete once any non-conforming areas have been dealt with (without any undue delay). Internal audit documentation must be kept and filed appropriately.

A full STS audit is conducted each year, usually in July as the year-end approaches at the end of that month, with support from the Technical Consultant. A System Review Report is produced each year. MFL have held certification with STS for a number of years and all points have been satisfied (no non-conformity issues to clear).

Reports are stored in the following file path:

[W:\Technical\ISO 14001\2024\Performance Evaluation\MFL Internal Audit Schedule \(013\).docx](W:\Technical\ISO 14001\2024\Performance Evaluation\MFL Internal Audit Schedule (013).docx)

<W:\Technical\ISO 14001\2024\Performance Evaluation>

(Individual audit reports for each topic is stored in the “Performance Evaluation” folder)

9.3 Management Review

Management reviews take place on a bi-annual basis, or more frequently if deemed necessary, with certain documents reviewed and updated more frequently (as determined by the Document Review Date Table referred to in section 7.5.3 of this Manual). The attendees present are the Directors and any other personnel as deemed appropriate.

All inputs and outputs are full documented and minuted in line with the requirements of the ISO 14001 standard. Any actions arising from the meeting must be completed without any undue delay and appropriate evidence filed with the Management review documentation.

Details of Management Review Meetings are stored in the following file path:

[W:\Technical\ISO 14001\2024\Performance Evaluation\MFL Management Review Meeting DD.MM.YY \(016\).docx](W:\Technical\ISO 14001\2024\Performance Evaluation\MFL Management Review Meeting DD.MM.YY (016).docx)

10 IMPROVEMENT

10.1 General

MFL ensures that improvement processes are completed and actioned as necessary. Analysis methods include various elements which include:-

- Internal Audits & Management Reviews
- 3rd party assessments for certification purposes
- Risks & Opportunities Register
- Improvement Log
- Non-Conformance & Corrective Action Log

MFL's Improvement Policy, Improvement Log and the Non-Conformance & Corrective Action Log are stored in the following file path:

<W:\Technical\ISO 14001\2024\Improvement>

10.2 Non-Conformity and Corrective Action

Should a non-conformity occur, including those arising from complaints, internal audits & external 3rd part assessment, MFL designates the appropriate Director to ensure that corrective action including root cause analysis is completed and implemented to avoid any further occurrences. This is then analysed and should the risk to the business pose to be "high" then this is then entered onto the Risk & Opportunities Register (See clause 6.1) to assist in mitigating the risk to the business.

Should any non-conformance occur then the internal audit report must be completed to ensure that a full analysis of the problem is resolved. Should any changes to the Business Management System, Products or Services be required then the Non Conformance & Corrective Action Log document shall also be completed. The Non Conformance & Corrective Action Log forms part of the Management Review meeting.

Any points for improvement raised during operational activities and observations will be logged in the Improvement Log which is also reviewed within the Management Review meeting structure.

10.3 Continual Improvement

Continual Improvement will be on-going through various elements of the Business Management System which are encompassed within this document.