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M.A. Ford Europe Limited

ENVIRONMENTAL POLICY & ORGANISATIONAL ADMINISTRATIVE ARRANGEMENTS

Reviewed by:	Date:	Revisions

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Section B - Organisational and Administrative Arrangements

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SECTION A

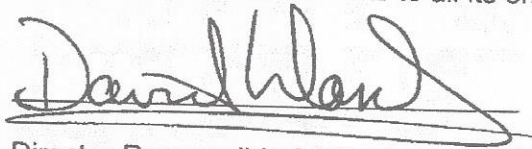
MA Ford Europe Limited recognises that there are many aspects of its activities that have impacts on the environment. The Company is committed to reduce any adverse effects of these impacts by implementing a programme of continuous improvement.

ENVIRONMENTAL POLICY

To meet that aim the Company policy is that **MA Ford Europe Limited** shall:

- Minimise waste by evaluating operations and ensuring they are as efficient as possible.
- Strive towards a reduction in the use of energy supplies.
- Ensure that waste is segregated and recycled whenever possible.
- Actively promote recycling both internally and amongst customers and suppliers.
- Consider, effective plant and equipment and building design to give the best performance with minimal environmental impact.
- Improve the company's environmental awareness by undertaking training of its employees at all levels.
- Minimise the risk of environmental accidents by assessing all possible risks and implementing emergency plans to cover them.
- Meet or exceed all the environmental legislation that relates to the Company.
- Make resources available to ensure that this policy is fully implemented
- Monitor and review its environmental performance on a regular basis.
- Publicise its environmental attainments to all its employees.

Signed:



Director Responsible for Environmental Policy

Date:

5th August 2024



SECTION B - ORGANISATIONAL AND ADMINISTRATIVE ARRANGEMENTS

1. DUTIES OF THE COMPANY

1.1. Executive Responsibility

The Board of Directors will ensure that the policy is applied throughout the company and are ultimately responsible for meeting the obligations of present and future environmental legislation.

1.2. Managerial Responsibility

The Managers / Supervisors will be responsible for ensuring compliance with the policy on the various locations. They should appoint a representative or coordinator to act as adviser and as a focal point for the dissemination of information and the promotion of local initiatives on improving the immediate environment, reducing wastage and achieving policy objectives.

1.3. Environmental Management: Responsibilities for Co-ordination

The Board of Directors will provide a regular forum for discussion of environmental policy issues, to enable policy development. It will monitor and review policy objectives and environmental initiatives and approve measures for improvement.

The Health, Safety and Environment Advisor will facilitate the formulation, promotion and application of the policy by communication, persuasion and education.

The Health, Safety and Environmental Advisor will not be the sole source of expertise but will endeavour to provide guidance on policy issues and provide information on the legal obligations outlined in the Environmental Protection Act (EPA).

1.4. Staff Involvement

Environmental protection involves contributions from everyone and it is the Company's intention to integrate environmental factors into the responsibilities of all its personnel.

The responsibilities which all employees have for the environment and compliance with policy guidelines will be emphasised in induction and training programmes.

Employees will be encouraged to present practical suggestions and ideas for waste reduction, energy conservation, minimisation of pollution etc. to their departments or sections for consideration.



2. WASTE REDUCTION AND RECYCLING

2.1. Recycling of general Company generated Wastes

The Environmental Protection Act 1990 has introduced measures to ensure that recycling is given priority.

Wherever possible our waste is segregated and where possible, recycled.

2.2. Waste minimisation

Waste reduction, as well as benefiting the environment may reduce raw material costs as well as costs for waste disposal. Locations should aim to develop waste reduction awareness in all employees. Re-use and re- cycling of materials should be investigated for all processes using raw materials and 'codes of practice' developed where necessary. All Locations should at the outset carry out a waste audit identifying all sources of waste, including water and energy consumption. Opportunities for the reduction of waste should be investigated (including a review of the company's purchasing systems). The efficiency of processes should be regularly assessed to ensure optimum use of raw materials.

Ideas concerning waste reduction or recovery emanating from employees should be carefully analysed by Supervisors and Managers.

Economic costs and benefits for each proposal should be carefully assessed.

2.3. Information and guidance

Practical information on the detail of current systems and procedures will be available from the Health, Safety and Environment Advisor.

2.4. Future and proposed initiatives

Recycling possibilities will be continuously reviewed.



3. PURCHASING POLICY

The Company will consider the implications for the environment and impact upon it when making purchase decisions regarding substances, materials, equipment and maintenance and building contracts. Considerations should be made consistent with all aspects of the Company's Environmental Policy and objectives.

In particular purchasers should consider:

- Energy usage - including mains water and drainage water
- Waste minimisation and process efficiencies
- Re-use and recycling opportunities
- Waste disposal implications
- Avoidance of ozone depleting substances
- Reduction of volatile organic compounds
- Reduction of materials containing heavy metals
- Control of discharges to air, land and water
- Noise levels generated from plant and machinery
- 'Eco-Toxicity' of materials released to land, air and water
- Transportation choice and pollution.

Detailed advice and guidance can be obtained from the Health, Safety and Environment Advisor based on information held concerning present and future legislative requirements, currently accepted practices and Best Practicable Environmental Option.



4. WASTE DISPOSAL

4.1. Household, Commercial and non-Hazardous Industrial Company generated Wastes.

The collection, storage and removal of wastes from the Company offices and associated sites will, as far as is reasonably practicable, be undertaken in accordance with the code of practice for 'Duty of Care in Waste Management' outlined in the Controlled Waste Regulations 1992.

The company shall ensure that all waste transfer notes shall have a 6-digit identification code, in accordance with the European Waste Catalogue, entered on them

Overall responsibility for waste collection and management rests with the Office and Location Managers and any controlled waste arising from Company activities will be dealt with in accordance

Advice on the definition, classification or description of waste can be obtained from the Company's Head Office.

4.2. Hazardous (Special) Waste

The Company acknowledges its responsibility as a waste producer, in particular with regard to the 'Duty of Care' outlined in the Environmental Protection Act.

Special waste is generally defined as having a 6-digit code and having one of the following hazardous properties: - explosive, flammable, toxic, infectious, ecotoxic, oxidising, irritant, carcinogenic, teratogenic, mutagenic, highly flammable, harmful, corrosive.

Paints, varnishes and adhesives that have a COSHH sign on the container and are not empty, should be classified as special waste as a precautionary task.

Special waste types being removed, must be accompanied by a waste consignment note

Waste disposal, waste management and the protection of the environment will be regularly scrutinised by the Health, Safety and Environment Advisor and the Health, Safety and Environmental Committee to ensure that all controlled wastes are handled in a careful and environmentally appropriate manner.



5. CONSERVATION OF RESOURCES

5.1. Energy Policy

The cost of electricity and other utilities is ever increasing and presents a significant portion of the overall cost of running the Companies offices.

The Company is committed to minimising its effect upon the environment without compromising the high standards of workplace facilities.

The Company will endeavour to specify and incorporate energy efficient facilities in new buildings, new developments and major refurbishment's.

The Company will promote energy conservation among its workforce by communication information and training.

A code of practice for energy and water conservation has been adopted by the Company and is a working document for office and on site staff.

5.2. Energy Audit

Energy reviews should be undertaken for office buildings or areas as appropriate to identify where energy savings could be made e.g. heating/cooling, lighting, and operational equipment.

The assessment of current energy use within the Company will be made when practicable and objectives and targets for energy reduction should be set outlining the detail and time periods when these could be achieved.

5.3. Transport Policy

Office staff and employees should use public transport whenever possible when travelling to and from work.

Company vehicles will be maintained to the highest standard and be tuned for optimum fuel consumption.

5.4. Recycling

Recycling schemes should be reviewed in the light of the initial objectives on a regular basis and any recycling initiatives should be planned with a view to being able to quantify the achievements of such schemes.

5.5. Water Conservation

Water use and water emissions to drain will form part of an energy audit and review conducted for Office buildings or areas. Objectives and target dates will be set for practical conservation measures to be achieved in these areas.



6. IMPACT UPON THE LOCAL COMMUNITY

6.1. Noise pollution

Events or developments during site surveys, installation of plant or equipment that are suspected to have significant noise production will be assessed before being introduced or undertaken to evaluate the possible noise levels and the potential to cause a nuisance to neighbours or others.

Initial assessments will be made in consultation with the Health Safety and Environment Advisor who will undertake noise surveys or inform if further specialist advice is necessary.

6.2. Other assessments

Similar assessments will be made where it is thought there is potential to cause any nuisance to neighbours or to others with regard to items such as:

- Traffic
- Litter
- Floodlights, or other new practices, changes or developments likely to affect the Local Community



7. ASSESSMENT OF NEW DEVELOPMENTS

7.1. Environmental impact assessment

The Company recognises that certain wildlife (e.g. bats) are protected by law, and will safeguard such species when likely to be affected by any development or during any survey activities.

7.2. Ecology and landscaping

Existing features of wildlife value will normally be retained in any development where practically possible. Where development is permitted, the impact on features of wildlife value shall be assessed and minimised.

7.3. Traffic

The implications for traffic access and parking shall be considered for all new building and road developments.

7.4. Checklist audits - environmental auditing

All proposed developments shall be subject to an 'environmental impact' assessment and an environmental audit or review based on current standards.



8. COMMUNICATION, INFORMATION AND TRAINING

8.1. Legislation

Relevant information on current and future legislation, statutory duties and implications for the Company will emanate from head office and from the Health, Safety and Environment Advisor.

8.2. Policy

The Company will endeavour to promote its environmental policy so that it is understood by all members of its staff and on site employees. General communications will be made through internal 'safety / environmental notices'.

8.3. Policy Issues

Communications on environmental policy issues will be made to the Location Managers and will normally emanate from head office or the Health, Safety and Environment Advisor.

8.4. Training

Specific training issues will be arranged by head office in co-ordination with the Health, Safety and Environment Advisor.

The overall aim of training will be to develop an understanding of the Company Environmental Policy, e.g.:

- Waste reduction and recycling principles
- Waste disposal systems
- Energy reduction and waste minimisation, and to promote awareness of the implications for the environment concerning all aspects of the Company's activities.



9. COMPLIANCE WITH STATUTORY REGULATIONS AND ADMINIMISATION OF POLLUTION

9.1. Transport

All Company transport will meet the current standard for exhaust emissions and will use lead-free fuels wherever reasonably practicable.

The policy will encourage the purchase of diesel and battery operated vehicles.

9.2. Emissions to atmosphere

Whether or not processes attract any statutory requirement for control of emissions to atmosphere all efforts will be made to reduce such emissions to as low a level as is reasonably practicable by the application of techniques to eliminate or by engineering control at source.

9.3. Emissions to drain

Any work task requiring pollutants to be discarded into the sewer system will be evaluated to determine the type and quantity of materials and frequency of such disposal.

Methods to eliminate, control or change the nature of such pollutants will be investigated but any such emissions necessary will be well within concentration standards specified by the Water Authority for the pollutant in question for disposal to sewer drain.

No disposal to surface water drains (i.e. those external to buildings) will be permitted and every effort will be made to prevent any accidental release, which could contaminate surface water.

9.4. CFC's and chlorinated hydrocarbons

The Company will endeavour to eliminate the use of CFC's and chlorinated hydrocarbons where suitable substitutes are available. This elimination and substitution will be considered as an integral part of COSHH Assessments.

9.5. Refrigeration Equipment containing CFC's

The Company plans to phase out all refrigerant liquids in common use that are ozone depleting substances and replacement by more acceptable substitutes.

PRESENT POLICY AND ACTIONS

- Audit all refrigeration equipment establishing type and approximate purchase date.
- Establish the refrigerant with which refrigerator equipment for proposed purchase is charged - ensure that it will not be phased out during a period acceptable to the user.



- For small self-contained units incorporating hermetically sealed compressors i.e. domestic fridges and freezers: - if plant is healthy run until end of useful life, but make a contingency plan in case of failure if equipment is required for essential duties. This may mean purchase of new equipment instead of repair as the refrigeration system may not be able to run on new refrigerant liquids without costly conversions - check with your supplier.
- Plan how to dispose of unwanted plant - the deliberate discharging of CFC's to atmosphere is illegal.

9.6. Pesticides/Herbicides

Pesticides are used only in situations when other methods of weed or pest control are impractical. The selection of the pesticide for regulation will be made for each individual operation on: -

- the basis of its suitability to achieve the necessary result.
- on its potential for harm to personnel.
- on its ecotoxicity.

The methods of use storage and disposal of pesticides will be in accordance with the HSC approved code of practice 'The Safe Use of Pesticides for Non- agricultural Purposes'.

Notification of each application of pesticides is made to the head office and is undertaken in accordance with any local code of practice. Types of pesticides used are reviewed by the Health, Safety and Environment Advisor when COSHH assessments are undertaken and new substitute materials are then considered.

10. MAINTENANCE OF BUILDINGS AND LAND

10.1. Nature Conservation

Nature conservation issues will be addressed by the Health, Safety and Environmental Committee. This seeks to:

- Identify and protect sites of wildlife interest.
- Promote nature conservation among the staff and employees.

10.2. Aesthetic issues

Aesthetic appearance of buildings and premises will be a major consideration for new developments or alterations made by the Company.

10.3. Landscaping

The Company will endeavour to ensure landscaping is planned and executed to provide an amenity, which can be maintained by environmentally acceptable methods.



11. ENVIRONMENTAL ASPECTS OF ENGINEERING

11.1. Maintenance

Maintenance of plant and equipment, planned preventative maintenance programs, have been established for vehicles, Company owned plant, generators lifting equipment and the like.

Records of maintenance activities are held at head office



12. INCIDENTS AND EMERGENCY

12.1. Procedures

Specific procedures have been adopted in certain high-risk areas for actions in an emergency. The emergency actions outlined in the Company's Health and Safety Policy should be followed and all incidents must be reported to head office so that they can be investigated as soon as possible.



13. TRANSPORT

13.1. Use of Public Transport

Employees are to be encouraged to use public transport when travelling to and from work.

13.2. Maintenance

Company vehicles will be maintained to the highest standards to limit emissions to the atmosphere and optimise fuel consumption.

13.3. Shared Transport

Company staff will be encouraged to give lifts to their fellow employees and share the driving when using their own transport to and from work.

13.4. Route planning

Route planning will be undertaken for all deliveries to ensure the most economical routes are used.

13.5. Vehicles

Vehicles will be optimised to ensure their economical use, with journeys planned before work starts.



14. MONITORING THE POLICY

14.1. Health, Safety and Environmental Committee

It is the intention of the Company to continue to monitor the success of the Environmental Policy and to continue to develop via a health, safety and environmental committee, guidelines and procedures to enable staff and its employees to achieve the policy objectives.



15. ENVIRONMENTAL ASSESSMENTS

15.1. Reviews

The Company's Health, Safety & Environmental Committee or Health and safety Advisor will at appropriate intervals review the environmental management systems adopted to ensure their suitability and effectiveness. The Board of Directors as appropriate will consider the report on such reviews.

15.2. Audits / Inspections

Audits and inspections of locations or of the Company's offices shall quantify environmental performance and define what needs to be done to sustain or improve it. Items to be considered should include:

- The Company's Policy, organisational structure, responsibilities of personnel.
- Administrative and operational procedures i.e. protocol, communications, information and training.
- The tidiness of locations and buildings.
- Purchase of raw materials including waste minimisation.
- Energy efficiency/conservation of resources.
- Process efficiencies (to optimise production and minimise waste).
- Recycling systems
- Wastes and discharges (including noise and odour).
- Transport and distribution systems.
- Systems for dealing with accidents and emergencies.

Audits / Inspections may be most conveniently carried out on locations in parallel with, or as part of a location's health and safety audit / inspection. Audits/inspections should be undertaken initially by Managers on an internal basis with support co-ordinated by the head office and the Health and Safety Advisor.

Site surveys and audit of central systems and procedures will be co-ordinated by the Health and Safety Advisor.

15.3. Progress

Progress with policy development and implementation will be reviewed by the Health, Safety and Environmental Committee on a continuing basis but will be the subject of major review every 2 years.



16. CURRENT RELEVANT LEGISLATION

Environmental Protection Act 1990 The Environmental Act 1995

The Control of Pollution Act 1974 The Water Resources Act 1991

The Groundwater Regulations 1998

Waste (England and Wales) Regulations 2011

The Controlled Waste (Registration of Carriers and Seizure of Vehicles Regulations 1991

Local Air Pollution Control (Part I EPA 1990 or PCC Regulations 2000) Hazardous Waste Regulations 2005

Control of Substances Hazardous to Health Regulations 2002

The Control of Pollution (Oil Storage)(England) Regulations 2001 Control of

Asbestos Regulations 2012

Control of Noise at Work Regulations 2005

Waste Batteries and Accumulators Regulations 2009

Construction Plant and Equipment (Harmonisation of Noise Emission Standards) Regulations 1985 & 1988

