

HI-LEX <small>CABLE SYSTEM CO., LIMITED</small>		ENVIRONMENTAL SYSTEM PROCEDURE	
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Environmental Management Policy

HI-LEX Cable System Co., Ltd is a wholly owned subsidiary of HI-LEX Corporation. The scope of the organisation includes the Design and Manufacture of Control Cables and Systems for the Automotive Industry.

HI-LEX Cable System Co., Ltd shall apply operational controls and procedures that aim **to prevent pollution**, to continually improve the Company's effects on the environment, and that result in protection of the Environment.

Areas of particular focus and key issues shall include: -

1. Waste Control and Disposal
2. Utilities usage and control
3. Pollution effects (eg. discharges and air emissions)
4. Environmental Emergency Planning
5. Sub-supplier improvement (eg conflict mineral requirements)
6. New Product Introduction – Material Selection (eg IMDS)

The company is committed to its environmental compliance obligations in relation to environmental legislation, regulations and other environmental expectations from HI-LEX Cable System Co., Ltd interested parties; and shall identify environmental objectives and targets with improvement action programmes that are reviewed annually as a minimum.

This Environmental Policy shall be available to all company employees and to interested members of the public. Further information may be obtained if requested by writing to the Quality Systems Manager.

Adam Glaznieks
Managing Director

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Environmental Responsibility Matrix

Title	Environmental Responsibilities		
Quality Manager (Management Representative)	Responsible for the Environmental System		Management review
Compliance Coordinator	Control of waste including the transport of waste	Environmental Concern and Corrective Action	Environmental Objectives and Programmes of Action
	Noise monitoring	COSHH register	Aspect scoring
	Discharge consent	Specialist advice	Maintenance of Aspects Register.
	Legal and Regulatory requirements	Environmental reviews	Communication
	Document control, procedure up-dates and audits.	Maintaining key performance indicators	
Quality System Manager (Management Representative)	Overall Environmental Management System Control	Training	
Plant Services Manager	Energy monitoring	Control of water, gas & compressed air	Emergency preparation and response
Materials and Logistics Manager	Materials and packaging	Transport method and selection	
Product Engineering Manager	Material selection	Process selection	
Production Manager	Waste segregation	Housekeeping	
Purchasing and Supplier Development	Supplier Selection	Supplier Development	

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Interested Parties

Ref	Who	Description
1	Hi- Lex Europe (HLE) Hi-Lex Corporation (HLJ)	HLE and HLJ provide the Corporate reporting structure. No environmental performance requirements are reported but notification is expected on environmental issues that affect the HCS business operation.
2	Customers	HCS customers include all external companies that purchase goods or services from HCS. The customers may request specific environmental requirements.
3	Suppliers	HCS suppliers include all external companies that provide materials and components that are used in the finished product. Suppliers form an indirect environmental impact as a result of HCS activities.
4	Employees	HCS employees are all personnel that have a permanent or temporary contract of employment, attending the HCS site routinely in line with their normal hours of work.
5	Contractors	HCS contractors are external companies that provide services or products that are necessary to support the HCS operational business activities. Key environmental contractors include SGS UK LTD the HCS ISO14001 certification body, Forward Waste Management contractor, all plant and service providers connected with environmental plus H&S maintenance activities.
6	Local Authority & Government	Provide the legal and regulatory requirements plus authorised agencies that HCS engage with to ensure compliance obligations are met. Key environmental agencies include the Environmental Agency, Natural Resource Wales and Neath & Port Talbot local authority.
7	Local Neighbours and the Site Landlord	Local neighbours include businesses and the Bae Baglan school adjacent to the HCS site. The site landlord is the owner of the leased building used by HCS.

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ISO 14001 Procedure Cross Reference

	EN01 Environmental Management Policy	EN02 Aspects Register Review and Control	EN03 Legal, Regulatory and compliance obligation Review and Control	EN04 Control of Environmental Communication	EN05 Concern Response, Preventative and Corrective Action Control	EN06 Emergency Preparedness, Response and Testing	G01 Company Planning and Improvement Process	G03 Training and Evaluation	Q02 Document and Data control	C02 Internal Audit	E02 Total Preventive Maintenance & Unplanned Maintenance	D02 Product Engineering Documentation Control	C04 Calibration
4.1 Understanding the organisation and its context	X	X											
4.2 Understanding the needs and expectations of interested parties	X	X	X										
4.3 Determining the scope of the environmental management system	X	X											
4.4 Environmental Management System	X	X							X	X			
5.1 Leadership and commitment	X						X						
5.2 Environmental Policy	X												
5.3 Organisational roles, responsibilities and authorities	X												
6.1 Actions to address risks and opportunities		X	X	X	X	X					X		
6.2 Environmental objectives and planning to achieve them		X					X				X		
7.1 Resources							X						
7.2 Competence							X	X					
7.3 Awareness	X						X	X					
7.4 Communication	X			X	X		X						
7.5 Documented information									X			X	
8.1 Operational planning and control		X									X		
8.2 Emergency preparedness and response						X							
9.1 Monitoring, measurement, analysis, and evaluation		X	X				X						X
9.2 Internal audit							X			X			
9.3 Management review							X						
10.1 Improvement General	X						X						
10.2 Nonconformity and corrective action					X								
10.3 Continual improvement	X				X		X						