

ENVIRONMENTAL PROCEDURES



modern moulds associates ltd

**LIGHTSFIELD
OAKLEY
BASINGSTOKE
HAMPSHIRE
RG23 7BY**

ENVIRONMENTAL PROCEDURES

1.1 ENVIRONMENTAL MANAGEMENT

The purpose of the company's environmental management procedure is to minimise our impact to both our immediate and global environment by constant review. It is also key to review existing projects to see if their impact can be reduced. Wherever possible the company complies with and adheres to the requirements and framework of ISO 14001.

The key areas for attention are as follows:

1. Reduction of the electrical power we use.
2. Removal of harmful, regulated or banned substances used in our customers products.
3. Reduction of wasted packaging, secondary activities or transport.
4. Rework of scrap and reject parts from production.
5. Ensuring whenever possible that the materials we use or specify don't contain SVHC or Banned Substances. If they do we will inform the recipient what they contain and why it is essential.

This list is not exhaustive, and any additional requirements should be added on review with the approval of a company director.

1.2 ENVIRONMENTAL POLICY

Modern Moulds Associates Ltd is a well-established company with an enviable reputation within the plastic injection moulding industry, our valued staff have many years' experience of providing tooling, moulds and supplying injection moulded parts and assemblies to a wide variety of industry sectors.

We provide a friendly, efficient and prompt service in response to all our clients' requirements. Modern Moulds Associates Ltd as a company offers total commitment to meeting the expectations of our customers while providing a cost effective and flexible manufacturing and supply capability that is second to none.

Protection of the environment in which we live and operate is part of Modern Moulds Associates Ltd values and principles and we consider it to be sound business practice. Care for the environment is one of our key responsibilities and an important part of the way in which we do business.

- In this policy statement we commit our company to:
- Complying with all relevant environmental legislation, regulations and approved codes of practice.
- Protecting the environment by striving to prevent and minimise our contribution to pollution of land, air, and water.
- Seeking to keep wastage to a minimum and maximise the efficient use of materials and resources.
- Managing and disposing of all waste in a responsible manner.
- Providing training for our staff so that we all work in accordance with this policy and within an environmentally aware culture,
- Regularly communicating our environmental performance to our employees and other significant stakeholders.
- Developing our management processes to ensure that environmental factors are considered during planning and implementation.
- Monitoring and continuously improving our environmental performance.

The policy statement will be regularly reviewed and updated as necessary. The management team endorses these policy statements and is fully committed to their implementation.

Signed on Behalf of the Company:  (Director)

Date:3/2/21.....

1.3 COMPANY ENVIRONMENTAL ACHIEVEMENT RECORD

ITEM	CONCERN or REQUIREMENT	ACTION	DATE
1	Use of Cadmium Pigments in yellow products for nylon.	Sourced an alternative pigment, same cost.	2005
1a	Transport reviewed.	Use hauliers for long distances not own transport. Cost and Fuel saved.	2004
2.	Large quantity of polypropylene used >15t pcm. Much used for "disposable" products	Sourced a reprocessed plastic from Luxus made from post-industrial and post-consumer sources. Saved also £200 pmt	2005
3.	FR ABS and FR PCABS products reviewed to ensure no banned substances	All ok	2006
4.	Packaging to long term local customer changed to plastic bins	Customer free issued bins. Saved 20 cartons per weeks. Passed on saving to customer	2006
5.	Site Wide review by the Carbon Trust to review company policys and activities to reduce carbon emissions	Appropriate recommended measures implemented. Except upgraded lighting which will be phased in as and when existing units fail. (Lighting now completed in 98% of factory 12/8/2015)	2006/7 (2011)
6.	ABS mirror backs to be marked >ABS<	Free of charge to customer, carried out when tools are set up and run.	2006/7
7.	Procurement of materials in one monthly batch.	Cuts down on supplier's transport, transport costs and reduction in cost to us. Requires advance notice from our customers of upcoming orders.	2007
8.	Wastepaper and cardboard	Have now sourced a local company to recycle plastic bags, cardboard and paper. We now have saved 50% going to landfill	17/8/2010
9.	New machines now fitted with Variable Speed Drives	Future machines are now ordered with variable speed drives offering typical 50% power saving.	2010
10.	Rework of scrap and reject parts from production.	Ongoing	2008
11.	Waste and recyclables going into the same General Waste	Now changed from 5 General waste to 3 recyclable and 2 general	2013
12a.	Lighting power consumption	Swapped all T12 fittings to T8 HF resulting in 6kw saving. =36,000kwh	2016
12b.	Lighting power consumption	Started process of swapping 58w HF bulbs to 21.5w LED's which will result in 3kw saving = 18,000 kwh	2017
13.	Petrol/Diesel Cars	Two directors' cars swapped from fossil fuel to all electric	2019
14.	New machines now fitted with Servo Drive	Swapping from VSD to Servo drives further increases the power efficiency of the new machines	2021

1.4 MATERIAL DECLARATIONS

There are a number of EU directives which affect the materials we use in our finished parts and in their creation. We have compiled this declaration to show our continued compliance with these directives and recommendations.

1.5 RoHS

The RoHS Directives 2002/95/EC (RoHS), 2011/65/EU (RoHS2), 2015/863/EU (RoHS3) stands for Restriction of Hazardous Substances and its purpose is the restriction of the use of certain hazardous substances in electrical and electronic equipment. This Directive bans the placing on the EU market of new electrical and electronic equipment containing more than agreed levels of the chemicals listed below.

Producers shall ensure that new electrical and electronic equipment put on the market on or after 1st February 2008 does not contain lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls or polybrominated diphenyl ethers and four phthalates in quantities exceeding the following maximum concentration value levels

- (a) 0.1% by weight in homogeneous materials for lead.
- (b) 0.1% by weight in homogeneous materials for mercury.
- (c) 0.1% by weight in homogeneous materials for hexavalent chromium.
- (d) 0.1% by weight in homogeneous materials for polybrominated biphenyls.
- (e) 0.1% by weight in homogeneous materials for polybrominated diphenyl ethers; and
- (f) 0.01% by weight in homogeneous materials for cadmium.
- (g) 0.1% by weight in homogeneous materials for Bis(2-ethylhexyl) phthalate (DEHP)
- (h) 0.1% by weight in homogeneous materials for Butyl benzyl phthalate (BBP)
- (i) 0.1% by weight in homogeneous materials for Dibutyl phthalate (DBP)
- (j) 0.1% by weight in homogeneous materials for Di isobutyl phthalate (DIBP)

Most of the chemicals mentioned in the banned list above have never been used in the plastic parts manufactured by the injection moulding plastics industry. The chemicals relevant to the plastics industry are the PBE and PBDE which were a constituent part of flame retardant additives in early FR rated plastics. These haven't been used in UK sourced materials for many years but have been present until recently in the lower quality end of the Asian imported goods and Asian sourced parts. Cadmium is used in some colour pigments to stabilise the colour at higher temperatures for the use in technical polymers.

1. The virgin grades of plastics MMA source contain none of the banned substances listed above so they comply with the requirements of RoHS, RoHS2 and RoHS3.
2. All pigments used in the colouration of parts for the electronics industry do not contain any of the banned substances. Therefore, they comply with RoHS, RoHS2 and RoHS3.
3. MMA don't add any of the banned substances in the production of our parts for the electronics industry therefore they will comply with RoHS, RoHS2 and RoHS3.

The management team at Modern Moulds Associates Ltd regularly review the RoHS list and will take the appropriate action and advise customers if the revised list includes a chemical which we use.

1.6 REPROCESSED PLASTICS

We regularly purchase and promote the use of reprocessed plastics for the manufacture of various components for a variety of industries. The use of these plastics is obviously deemed very environmentally friendly as it makes use of both industry and post-consumer waste which is preferable to its landfill or incineration.

However, the reprocessors of these plastics cannot 100% guarantee that there will never be any of the banned substances or SVHC in the finished material. For them to test every batch of recycled plastic which are sourced from many areas of industry and post-consumer waste would be too prohibitive financially and stop this valuable recycling effort. This is essentially what WEEE (see below) is all about.

What they do to show due diligence is random sampling of finished product on a monthly basis. If any of the banned chemicals are present, they can take appropriate action. Any chemicals which may be present have not "been intentionally introduced" or "deliberately utilised in the formulation of a material or component where its continued presence is desired in the final product to provide a characteristic, appearance or quality. The use of recycled material as feedstock for the manufacture of new products, where some portion of the recycled materials may contain amounts of regulated elements, is not to be considered as intentionally introduced" (extract from our suppliers Compliance Declaration)

If this statement is of concern or not deemed compliant enough for your industry or customer then please advise us so we can recommend suitable alternative Virgin materials for the manufacture of your parts.

1.7 BANNED SUBSTANCES

In addition to the substances banned under RoHS there are several chemicals and substances which are also commonly banned or restricted in their use. It is important to note that the majority of these have never been used by the UK plastics industry. These are referred to as PBT substances (Persistent, Bioaccumulative and Toxic) or vPvB (very Persistent and very Bio-accumulative). The listed substances are not used or added to parts manufactured by MMA but there is a slight chance that there may be traces of these chemicals in the recycled materials which we use. They are not added to the recycled materials by us or the producers but may merely be present from previous contact with such chemicals. See item 1.6 above

1.8 REACH

REACH is a new EU regulation concerning the Registration, Evaluation, Authorisation and restriction of Chemicals. It came into force on 1st June 2007 and replaces a number of European Directives and Regulations with a single system.

It is intended that all chemicals in excess of 1t imported from outside the EU will be registered by the importer or manufacturer so they can continue importing them.

MMA do not currently have any obligation under REACH as we do not manufacture or convert chemicals. However, we are in a position where if our suppliers of Raw materials have not registered the chemicals that they import from outside the EU we could potentially be unable to supply our customers as we would have no raw materials.

To this end we have received confirmation from all our major suppliers of raw materials that they have or will have registered the materials.

1.9 REPORTABLE SUBSTANCES and SUBSTANCES of VERY HIGH CONCERN (SVHC)

We constantly monitor the updated list SVHC and regularly request notification from all of our suppliers that the materials provided to us do not contain banned substances or SVHC in a higher than permitted concentration. We source our materials from large UK based suppliers who are bound by these restrictions and legislation and are both environmentally responsible and ethical.

There are a number of substances which environmentally are undesirable in finished goods and their production. MMA do not use or add any of these in the finished goods or production of the finished goods unless noted below.

None

2.0 WEEE

The Waste Electrical and Electronic Equipment Directive (WEEE Directive) aims to minimise the impact of electrical and electronic goods on the environment, by increasing and encouraging re-use and recycling and reducing the amount of WEEE going to landfill. It seeks to achieve this by making producers responsible for financing the collection, treatment, and recovery of waste electrical equipment, and by obliging distributors to allow consumers to return their waste equipment free of charge.

The Waste Electrical and Electronic Equipment (WEEE) Directive was agreed on 13 February 2003, along with the related Directive on Restrictions of the use of certain Hazardous Substances in electrical and electronic equipment (RoHS).

We do not manufacture any electrical or electronic equipment, so this directive does not directly affect our business. However we manufacture both plastic enclosures and other parts for electronic equipment for our clients so we take on a role in assisting our client to ensure their product is as recyclable and reusable as practical.

The list below, although not comprehensive, is indicative of some of the considerations we regularly raise to our customers when assisting in designing new parts of equipment or continuing to supply existing part.

1. Ensuring the part complies with RoHS regulations regarding banned substances.
2. Can the part be marked with a recycling logo to show the material used in its construction i.e. >ABS<. This will enable it to be easily recycled at the end of its life.
3. Can the part be manufactured from a recycled grade of material?
4. Does the part need the logo indicating to not 'bin' the part?
5. Can the part have the manufacturers name engraved / printed on it to ensure it can be returned to them for correct disposal or recycling at end of life.

3.0 CONFLICT MINERALS

From time to time, we are erroneously requested for Declarations relating to Conflict Minerals and our guarantees that we do not use materials sourced from companies which deal with these regions. However, as a plastics converter, we do not actually use these materials in our process. So, to prevent wasting our company resources filling in these unrelated declarations we declare in this document that we don't actually use these materials at all.

Should we change processes and start using materials such as tin, tantalum, tungsten, gold or any other material that is designated under the applicable rules of the Securities and Exchange Commission as a "conflict mineral" we will take appropriate action and declare to interested parties that we are now using these materials. This will enable our customer to be, or remain to be, compliant with applicable laws, rules and regulations relating to conflict minerals.

4.0 FUTURE

Should you have any specific concerns or suggestions then please let us know and we will do our best to answer your query. Should you require specific datasheets for the materials which we use in your products then we can either provide those or give details as to where they will be found on the web should you require regular checks.

ISSUE	AMENDMENT	AUTHORISED	DATE
1	First Issue	Steve Whiles	3/9/2007
2	RoHS, WEEE, REaCH and SVHC sections added	Steve Whiles	16/10/2008
3	Updated	Steve Whiles	27/11/08
4	SVHC sections amended to reflect updated and changed legislation	Steve Whiles	18/9/2015
5	Updated to a more generic format to ensure long lists of unknown chemicals are not required.	Steve Whiles	20/10/2015
6	Conflict Minerals exemption added	Steve Whiles	01/11/2016
7	Addition and Update of Achievements	Steve Whiles	3/2/2021