

complete

STEERING

Environmental Policy

1. Environmental Statement

- 1.1. The Environmental and Sustainability Statement of Complete Steering Ltd (“the Company”) is to ensure, so far as it is reasonably practicable, that its operations will be carried out with a commitment to protecting and enhancing the environment.
- 1.2. As a business that uses materials that could potentially harm the environment – oils, solvents, cleaning fluids etc., we recognise that we have a responsibility to the environment beyond legal and regulatory requirements, and as such we are committed to reducing our environmental impact and continually improving our environmental performance as an integral part of our business strategy and operating methods, with regular review points. We will encourage customers, suppliers and other stakeholders to do the same.
- 1.3. The Company aims to establish a high priority of its principles in the corporate strategy. Concern and awareness for the environment is the responsibility of the Directors of the Company.
- 1.4. The Company therefore seeks to comply with all relevant environmental legislation and regulation. It also aims to establish higher standards of environmental performance where these are practicable and appropriate.

2. Scope of Policy and Responsibilities

- 2.1. The Company’s employees have a legal and moral obligation to carry out their duties with concern for the environment. All Company employees must adhere to the aims and objectives of this Policy.
- 2.2. This policy applies to all employees and officers of the Company and forms part of the employment contract with employees. Its contents are to be regarded by any person as implied, collateral or express terms to any employment contract made with the Company.
- 2.3. It is the responsibility of all employees to ensure they are familiar with the contents of this Policy and follow the procedures and guidelines laid out herein. Non-adherence of this policy could result in disciplinary action leading up to and including termination of employment.
- 2.4. Our stated aims are to:
 - 2.4.1. Comply with and where possible, exceed all regulatory and legislative requirements.
 - 2.4.2. Continually monitor and work to improve our environmental performance.
 - 2.4.3. Continually monitor and work to improve and thereby reduce our environmental impacts.
 - 2.4.4. Where possible, incorporate environmental factors into business decisions.
 - 2.4.5. Manage waste generated from my business operations according to the principles of reduction, re-use and recycling.

- 2.4.6. Ensure that where relevant, all employees are trained to have awareness of environmental issues that relate to the Company.
- 2.4.7. Respond swiftly to accidents or incidents that have a potential to threaten the environment.
- 2.4.8. Encourage the development of products, processes and equipment with concern for the future of the environment.

3. Steering Products

- 3.1. EPS Column systems detect precisely when assistance is required and to what extent help is needed to aid the driver in controlling the direction of a vehicle. Such systems improve fuel efficiency and reduce the long term 'footprint' a given vehicle may have upon our environment.
- 3.2. Electrically Powered Assisted Steering (E-PAS) benefits include:
 - 3.2.1. Reduced vehicle fuel consumption;
 - 3.2.2. Reduction in harmful exhaust fumes;
 - 3.2.3. Significant reduction in vehicle assembly time;
 - 3.2.4. Elimination of hydraulic hoses, pumps, reservoirs and associated fluids;
 - 3.2.5. No contaminated fluids as a result of remanufacturing process.
- 3.3. In order to realise the long lasting environmental benefits of E-PAS installed by automotive manufacturers, the Company remanufactures this technology to the highest standards required by Original Equipment Manufacturers (OEMs).
- 3.4. The benefits of remanufacturing a defective steering unit, installing new and often improved critical components, include:
 - 3.4.1. Less waste;
 - 3.4.2. Less manufacturing energy required to make new units; and
 - 3.4.3. Units remanufactured within the UK and cuts need for international transportation.

4. Paper

- 4.1. We will seek to minimise the use of paper in our office, using digital means where possible.
- 4.2. We will recycle paper where possible and seek to buy recycled and recyclable paper products.
- 4.3. We will use 'waste' paper for notepads unless confidentiality may be compromised.

- 4.4. Reduce our consumption of resources and improve the efficiency of those resources by printing double sided where practicable

5. Business Consumables

- 5.1. Waste products are a necessary by-product of our industry. Waste produced in our business includes spent oils, lubricants and worn out or damaged mechanical assemblies and tools.
- 5.2. Where possible we will use recycled or ecologically friendly paper towels to clean up.
- 5.3. We will seek to reduce our consumption of resources and improve the efficiency of those resources by using concentrated products where practicable.
- 5.4. We will recycle all paper products unless the manufacturer of the cleaning product does not recommend it.
- 5.5. We will aim to continuously improve our environmental performance particularly with regards to our choice of the products we use, ensuring wherever possible that their use will not cause harm to the environment.
- 5.6. We will manage waste generated from the business operations according to the principles of reduction and recycling.
- 5.7. We will ensure that all used oils and other lubricants are stored for collection, and that mechanical parts are sent to the appropriate recycling centres.

6. Energy and Water

- 6.1. We will seek to reduce the amount of energy used in our workshop.
- 6.2. Lights and electrical equipment will be switched off when not in use.
- 6.3. Where possible, heating levels will be adjusted downwards with energy consumption in mind.
- 6.4. The energy consumption and efficiency of new products will be taken into account when purchasing.

7. Transport

- 7.1. Driving is a necessary part of our work. Wherever possible we will drive the most fuel-efficient vehicles between jobs.
- 7.2. Through employee training on efficient driving, we will seek to reduce our fuel consumption.
- 7.3. We will ensure that our vehicles are regularly serviced to maintain their optimum efficiency.

7.4. We will try to encourage our suppliers to use fuel efficient vehicles for their deliveries.

8. Green Culture

8.1. We will involve our staff in the implementation of this Policy in order to achieve greater commitment and improved performance.

8.2. We will work with our suppliers, contractors or sub-contractors to encourage them to improve their environmental performance.

8.3. Where possible, we will use local labour and material suppliers in an attempt to reduce our CO2 footprint.

8.4. If any liquids are spilt in the workshop, we will use the appropriate cleaning/soak up media and will not allow any liquids to enter the drainage system or local waterways.

8.5. All storage tanks will be bunded to prevent leakage to the environment.