

# **Environmental Management System Policy Manual**

**Revision Date: 06/25/2024**

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## Introduction

In 1958, Small Parts, Inc. was formed to produce and sell small, custom, precision stamping and springs in high volume to industrial markets. From its modest beginning in a rented building of 4,000 square feet in Logansport, Indiana, the company has grown into a world class organization with over \$85 million in annual sales and ~400 skilled employees operating in three facilities with nearly 300,000 square feet space in not only Logansport but Reynosa and Juarez, Mexico. In addition, capabilities have expanded into larger parts and engineered subassemblies.

## Purpose – Environmental Management System Integration

Small Parts, Inc - has a strategically planned environmental management system that conforms to ISO 14001. Small Parts, Inc. provides precision metal stampings and assemblies to the automotive and commercial markets. We have integrated our Environmental Management System (EMS) as part of our business, where management is the cornerstone and bears the responsibility, accountability and required leadership in maintaining the EMS. We are committed to excellence in quality and strive to maintain environmental compliance as a foundation of our business. Our Environmental Policy, Objectives, Compliance Obligations, EMS Policy Manual, operating procedures, process turtles, documents & forms are written in an easy-to-use manner to be a useful and relevant guide to our integrated process approach in conducting our business. Operating procedures and work instructions are maintained to give more detail, definition, and clarify responsibilities for a process or a procedure.

Throughout this manual, as well as other documents, the EMS is termed as a business management system or business system to encourage the integration of our EMS into day-to-day life of the business with no notable separation of the systems. This matured system provides the foundation to address our compliance obligations. However, we understand that it takes more than a foundation to demonstrate an ability to provide a level of excellence and consistent results that lead to environmental compliance. That is why everyone at Small Parts, Inc. is committed to skillful execution and continual improvement of our manufacturing processes including product, customer, corporate, statutory and regulatory requirements.

This environmental policy manual gives our employees, customers, suppliers, subcontractors, and any other relevant interested parties, an overview and outline of our business and the framework for the requirements, as mentioned above and described in Figure 1. Our senior management team is dedicated to communicating the importance of meeting these requirements, as well as regulatory and legal requirements. Throughout this manual and our procedures, the terms *Senior Management* and *Top Management* are used interchangeably. We define our Senior /Top Management team from the President, to managers whom are responsible for all aspects of Small Parts, Inc. including respects to financial, quality, production and the environment.

## Scope Statement

Manufacture of Precision Slide and Formed Stampings, Electrical Terminal Components and Assemblies to Customer Specific Requirements

## Environmental Management System (EMS) Scope

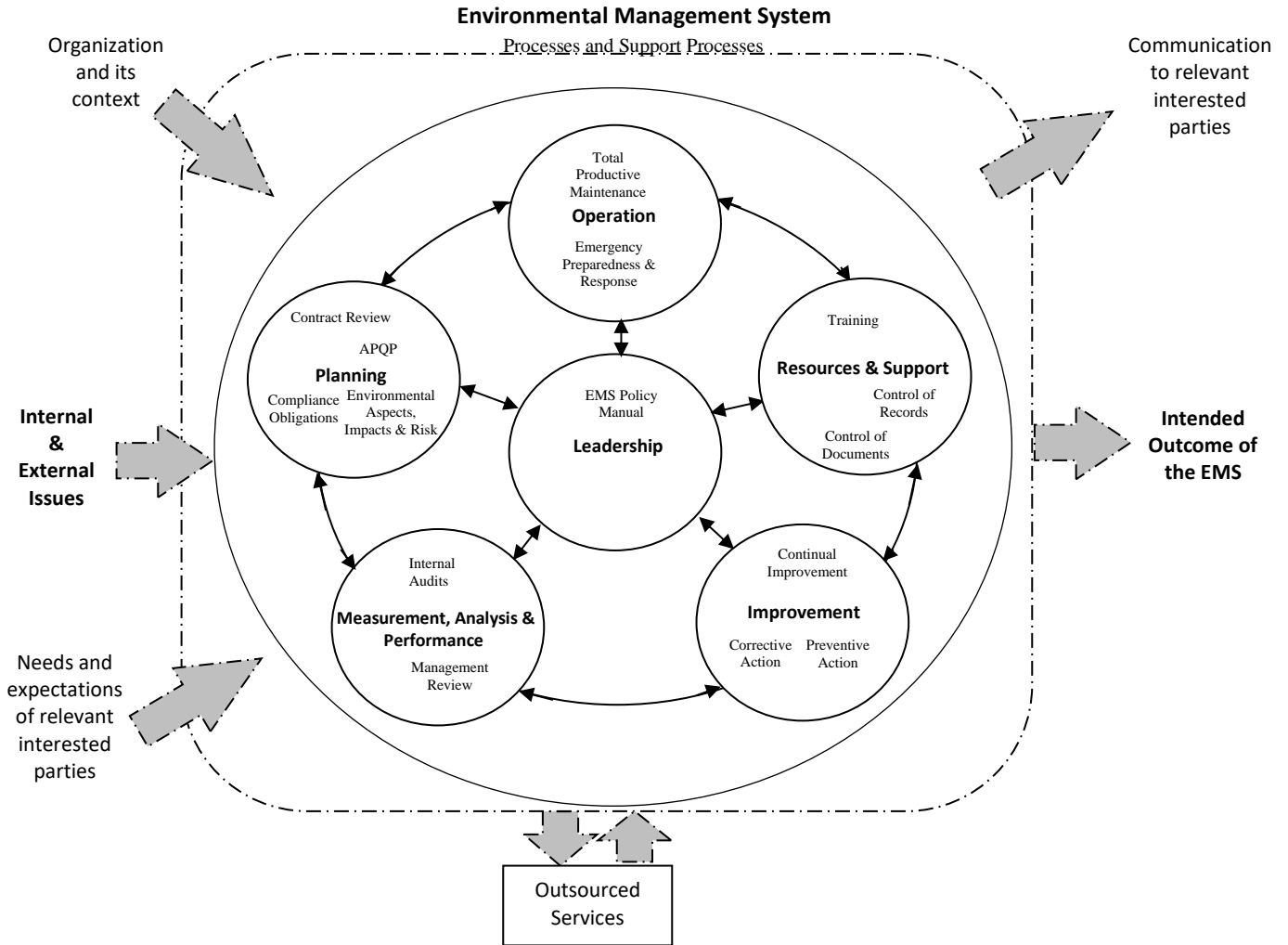
The EMS scope applies to the business activities related to the products and services provided/undertaken by the Small Parts, Inc. – Logansport, Indiana facilities as outlined in our above scope statement and the locations located at 600 Humphrey Street and 112 E. Mildred Street. Small Parts, Inc. pursues a strategy that not only encompasses all our activities, but also those of our suppliers, customers, stakeholders and other interested parties. We aim to influence our impact on the environment, not only for our own business but those we interact with as well.

**Relevant Interested Parties – Figure 1**

Aspects	Interested Party	Relevant Interested Party	Needs and expectations	Risk to Organization	Internal /External
Competitive and Market	Customers	Top (5) customers of revenue.	Receive quality products/services that meet their specifications. Consistency of quality, delivery and compliance.	Large concentration of revenue	External
Knowledge	Employees	Employee	Good work environment, job security, health & safety. Recognition and reward.	Low unemployment ( <i>unable to hire needed resources</i> ), Turnover	Internal
Competitive and Market	Suppliers	Top suppliers making accountable for 90% of purchases.	Mutual benefit and continuity and consistency of quality, delivery and compliance.	Loss of competitiveness or market through supply interruption.	External
Performance	Owners / Shareholders	Board of Directors	Sustained profitability, Transparency	Return on investment and dividends expectations.	Internal
Cultural and Social	Public / Community	City of Logansport, IN, Neighbors, Schools,	Environmental protection, Ethical behavior, Compliance with statutory & regulatory requirements	Change in local laws.	External
Compliance	Certification bodies	Intertek	Assess needs of the company against ISO 14001 must be notified of changes in the EMS.	Loss of certification	External
Values and Culture	Management	Executives	Leadership, direction, resources, involvement, motivation, etc.	Turnover	Internal
Competitive and Market	Competitors	Top competitors in each market segment.	Provide challenges to our ability to provide products/services to customers.	Loss of business and revenue.	External
Legal	Regulators	Indiana Dept. of Environmental Mgmt., Logansport Municipal Utilities	Dictate controlling regulations that have impact on the management system and our products	New environmental laws	External
Legal	Contractors	Individual contractors used.	Compliance with statutory & regulatory requirements. Safe work environment.	Unsafe or noncompliant acts.	External

**Process Approach - Process**

**Interactions – Figure 2**

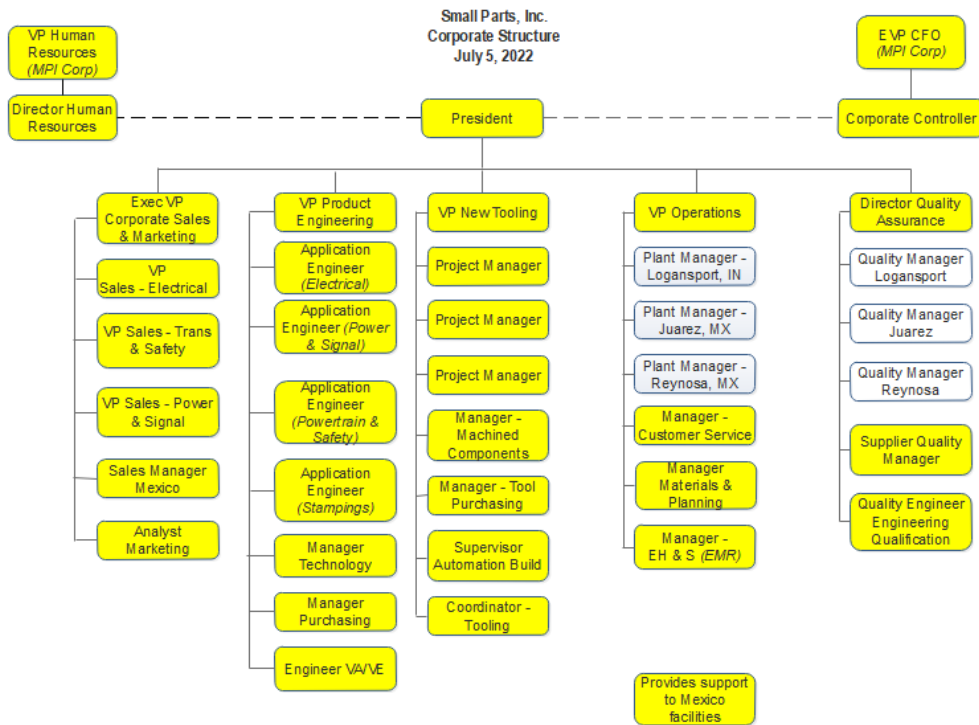


**Small Parts, Inc. - Processes, Support Procedures and Work Instruction Reference Table**

Processes	Support Processes and Documents	
	Procedures	Work Instructions
Leadership	Management Review	Facilities and Equipment Maintenance
Operation	Control of Records	Record Retention
Planning	Control of Documents	SPCC
Measurement Analysis & Performance	Environmental Aspects, Impacts and Risk	
Resources & Support	Compliance Obligations	
Improvement	Internal Audit	
	Preventive Action	
	Corrective Action	
	Continuous Improvement	
	Emergency Preparedness	
	Training	
	APQP	
	Contract Review	
	Total Productive Maintenance	

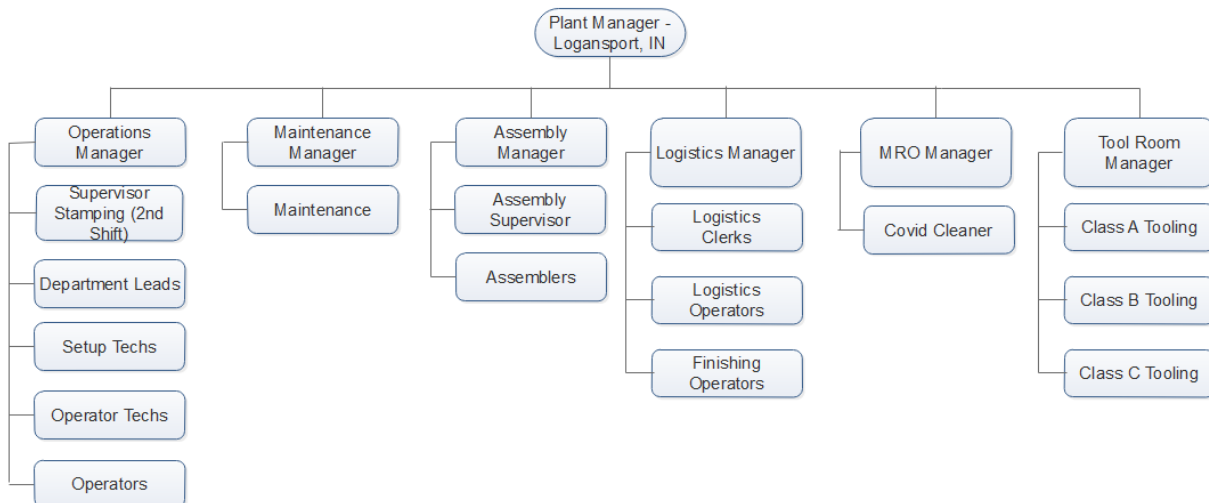
## Small Parts, Inc. – Organizational Charts

### Organizational Structure



### Logansport Operations

Small Parts, Inc.  
Logansport Operations  
July 5, 2022



## **Our Commitment to Excellence: Environmental Policy & Objectives**

### **Environmental Policy**

Small Parts, Inc. is committed to preventing pollution, complying with applicable legal and other requirements, and setting objectives and targets that foster continual improvement.

### **Environmental Objectives**

- Reduce the Carbon Emission trackers (Electricity and Natural Gas) by operations by 3% annually
- Operations will be compliant with all local, state and federal requirements.

### **Our Vision and Values**

Through the development and application of our core values of *integrity, excellence and service*, Small Parts, Inc. will continue to be a leader in our market, providing superior value in our relationships with our customers, employees, owners and other interested parties.

What do our values mean to our customers?

#### *Integrity*

- doing the right thing

#### *Excellence*

- doing things right

#### *Service*

- doing things with the right attitude

### **Corporate Responsibility:**

Built on these values, is a safe and ethical work environment which supports our social responsibilities. Our policies including the ones listed below, ensure our employees work in this ethical environment without fear of reprisal.

- Code of Conduct Policy
- Anti-bribery Policy
- Ethics Policy

## Communication Table

Location	Type of Communication	Purpose of Communication	Owner	To Whom	Frequency	Documentation
All	Daily Production Meeting	Communication and status of relevant issues to the organization.	Production Mgr.	Plant Staff personnel	Daily	Meeting minutes
All	Management / Operational Reviews	Review of the EMS to ensure its continuing suitability, adequacy, effectiveness and alignment with the strategic direction.	Plant Mgr.	Plant Staff personnel	Monthly	Operational review manual and electronic copies
ALL	Environmental Policy	Communication of Environmental Policy	EMR	Relevant Interested parties	As needed	On-boarding, bulletin boards, Business Policy Manual, Website
All	Environmental Objectives	Communication of Environmental Objectives	EMR & Management	Relevant Interested party	As needed	On-boarding, bulletin boards, Business Policy Manual
All	Environmental Aspects	Communication of Environmental Aspects	EMR & Management	Relevant Interested party	As needed	Bulletin boards, Business Policy Manual
All	Reaction Plan	Action steps required when spills.	EMR	Production Employees	Daily	Signs throughout manufacturing areas
All	Interested parties	Communication and status of relevant issues to and from an interested party.	Organization (Various departments-topic dependent. )	Interested party	As needed	Communication may be done through various methods, including but not limited to, verbal and documented
All	EHS Committee Meeting	Review of operations, corrective actions, and items for continual improvement	EMR	EHS Committee members (Employees)	Monthly	Meeting minutes, corrective action items



**ISO 14001:2015 Environmental Management System Bridge Table**

Clause	Sub-clause	Standard	Environmental Management System Supporting Documentation Location				
			Policy	Process	Procedure	Work Instruction	Form/Document
<b>4.0</b>							
	4.1	ISO 14001:2015	Environmental Policy Manual				
	4.2	ISO 14001:2015	Environmental Policy Manual				
	4.3	ISO 14001:2015	Environmental Policy Manual				
	4.4	ISO 14001:2015	Environmental Policy Manual				
<b>5.0</b>							
	5.1	ISO 14001:2015	Environmental Policy Manual				
	5.2	ISO 14001:2015	Environmental Policy Manual				Environmental Policy
	5.3	ISO 14001:2015	Environmental Policy Manual		Processes, Procedures, WI		
<b>6.0</b>							
	6.1	ISO 14001:2015	Environmental Policy Manual	Process Turtles	Management Review		SWOT
	6.1.1	ISO 14001:2015	Environmental Policy Manual	Process Turtles	Management Review		SWOT
	6.1.2	ISO 14001:2015	Environmental Policy Manual	Leadership Operation Planning	Environmental Aspects, Impacts and Risks Management Review		Significant Aspect List
	6.1.3	ISO 14001:2015	Environmental Policy Manual	Leadership Operation Planning Measurement Analysis & Improvement	Environmental Aspects, Impacts and Risks, Compliance Obligations, Management Review		Compliance Calendar
	6.1.4	ISO 14001:2015	Environmental Policy Manual	Planning	APQP Contract Review Management Review, Compliance Obligations, Environmental Aspects, Impacts and Risk, Emergency Preparedness and Response		SWOT, Action Plans
	6.2.1	ISO 14001:2015	Environmental Policy Manual		Management Review Continual Improvement		Environmental objectives

Clause	Sub-clause	Standard	Environmental Management System Supporting Documentation Location				
			Policy	Process	Procedure	Work Instruction	Form/Document
	6.2.2	ISO 14001:2015	Environmental Policy Manual	Planning	Management Review, APQP, Contract Review, Environmental Aspects, Impacts & Risk, Compliance Obligations, Change Control		Compliance Calendar
<b>7.0</b>							
	7.1	ISO 14001:2015	Environmental Policy Manual	Leadership	Management Review		
	7.2	ISO 14001:2015	Environmental Policy Manual	Resources & Training	Training		Critical Training Matrix
	7.2.1	ISO 14001:2015	Environmental Policy Manual	Resources & Training	Training		Critical Training Matrix
	7.2.3	ISO 14001:2015	Environmental Policy Manual	Resources & Training	Training		Critical Training Matrix
	7.2.4	ISO 14001:2015	Environmental Policy Manual	Measurement Analysis & Improvement	Internal Audit, Training		Critical Training Matrix
	7.3	ISO 14001:2015	Environmental Policy Manual	Resources & Training	Training		Critical Training Matrix
	7.4	ISO 14001:2015	Environmental Policy Manual	Resources & Training	Training		
	7.4.1	ISO 14001:2015	Environmental Policy Manual	Leadership			
	7.4.2	ISO 14001:2015	Environmental Policy Manual	Leadership			
	7.4.3	ISO 14001:2015	Environmental Policy Manual	Leadership			
	7.5	ISO 14001:2015	Environmental Policy Manual	All Process Turtles	All procedures	All work instructions	Identified forms/records
	7.5.1	ISO 14001:2015	Environmental Policy Manual	All Process Turtles	All procedures	All work instructions	Identified forms/records
	7.5.2	ISO 14001:2015	Environmental Policy Manual	Measurement Analysis & Improvement	Control of Documents		
	7.5.3	ISO 14001:2015	Environmental Policy Manual	Measurement Analysis & Improvement	Control of Documents		
<b>8.0</b>							
	8.1	ISO 14001:2015	Environmental Policy Manual	Operation Planning	APQP, Environmental Aspects, Impacts & Risk, Compliance Obligations, Training, Emergency Preparedness & Response		

Clause	Sub-clause	Standard	Environmental Management System Supporting Documentation Location				
			Policy	Process	Procedure	Work Instruction	Form/Document
	8.2	ISO 14001:2015	Environmental Policy Manual	Operation	Emergency Preparedness & Response		
<b>9.0</b>							
	9.1	ISO 14001:2015	Environmental Policy Manual	Measurement Analysis & Performance	Internal Audit Corrective Action Preventive Action Management Review Change Control Compliance Obligations Continual Improvement		
	9.1.1	ISO 14001:2015	Environmental Policy Manual	Measurement Analysis & Performance	Management Review		Operational Review Checklist
	9.1.2	ISO 14001:2015	Environmental Policy Manual	Planning	Compliance Obligation		Compliance Calendar
	9.2	ISO 14001:2015					
	9.2.1	ISO 14001:2015	Environmental Policy Manual	Measurement Analysis and Performance	Internal Audit		Operational Review Checklist
	9.2.2	ISO 14001:2015	Environmental Policy Manual	Measurement Analysis and Performance	Internal Audit		Operational Review Checklist
	9.3	ISO 14001:2015	Environmental Policy Manual	Leadership, Measurement Analysis and Performance	Management Review		Operational Review Checklist
<b>10.0</b>							
	10.1	ISO 14001:2015	Environmental Policy Manual	Improvement	Continual Improvement		Operational Review Checklist
	10.2	ISO 14001:2015	Environmental Policy Manual	Improvement	Corrective Action Preventive Action		Operational Review Checklist, Corrective Action Report

## Revision History

Revision Number	Brief Description	Date
Rel.	Initial Release	12-11-18
1	Update to organizational charts	8/28/2020
2	Revised Organizational Multi-level Risk Mitigation Table adding Contingency Plan addressing global pandemic.	11/24/2021
3	Updated organizational charts due to re-organization in Jan 2021, removed Organizational Multi-level Risk Mitigation Table (MRIMT)	2/25/2021

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4	Updated organizational charts due to re-organization in July 2022, fixed Revision History for #2 Date contained wrong year	8/8/2022
5	Updated the Environmental Policy and its associated documentation	6/25/2024