



THE BETTER CONNECTION

## Health, Safety and Environment (HSE) Policy

### IN GENERAL:

The Company's practices and standards are designed not only to protect and safeguard people and the environment, but also to meet or exceed requirements stipulated by law or regulations.

In order to achieve these objectives, we will identify HSE risks arising from our activities and reduce them to the lowest practical levels. Our goal is to minimize impact to the environment and to prevent harm to our employees, our clients, our communities, and all others who could be affected by those activities. At Brück, we are committed to continual improvement in the health, safety and environmental domains by:

- Providing a safe and healthful workplace
- Prevention of pollution
- Continual improvement of HSE performance
- Compliance with any legal requirements and regulations and development of corporate initiatives

Fulfilling the expectations customers have and the demands they make of our products, and meeting what is required of our products as a result of laws and standards, both internal and external, is our prime goal.

An important part of Brück corporate policy is providing for emergencies and hazardous incidents, and minimizing the effects of such on its own employees, those from other companies and people residing in the vicinity.

### ***Continuous improvement***

The goal of constant improvement has got high priority. In our company it is achieved through leadership and personal responsibility, adherence to Brück values, effective training and communication between all interested groups, exchange of information among employees and on-going performance feedback.

Brück expands efforts to guarantee continuous improvement of its products / processes and as well by pursuing a zero-defect strategy at all levels. It strives to adopt preventive measures to avoid or minimize any environmental effects and any risks for the safety and health of its employees. These measures follow the latest insights of technology, occupational medicine and other established results of ergonomic science. By developing and constantly improving facilities and processes the company wants to meet market requirements with the utmost operational and economic efficiency.



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## HEALTH & SAFETY POLICY:

Ensuring the health and safety of employees and creating safe work environments is a core value of Brück. Over a number of years the company has been developing a prevention policy aimed at improving work conditions. The management of Brück maintains a proactive approach toward all employees and is accountable for promoting continued safety education and training, continuously striving to identify potential areas of improvement, and ensuring a thorough evaluation of all incidents.

Brück's HSE policy refers to the **rules and regulations of the following authorities:**

- The Europe-wide Labour Protection Laws
- The Regulations of Industrial Safety
- The Health and Safety at Work Act

On its company premises the company Brück promotes security based on the following priorities:

- Brück promotes the qualification of its employees as a continuous process - this is achieved by professional trainings and by measures to increase their motivation and satisfaction
- In order to enhance the level of qualification Brück carries out regular training courses and advanced trainings, such as:
  - Courses for first-aiders from all departments
  - External occupational health and safety seminars which are mandatory for the departments Occupational Health and Safety, Maintenance, Manufacturing and Hot Forming
  - Schooling of forklift operators (as and when required)
  - Preventive fire protection courses
  - Individual training to handle hazardous equipment

Brück determines the prevention at the workplace as a priority by:

- Standardizing the required actions by the strictest regulations
- Handing out material safety data sheets to all employees concerned to enable all materials used on site to be properly handled, stored, transported, used, and disposed
- Maintaining a complete and current inventory of all products, wastes, and other materials present in the workplace for the identification and assessment of hazards
- Providing all the necessary personal protective equipment (protective goggles, hard-toed shoes, etc.) to each employee
- Regular medical check-ups of all employees with regard to their respective activities



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- Facilitating communication and consultation and distributing all relevant information, thereby ensuring continual improvement in performance and co-ordination
- Recording all incidents / complaints and taking appropriate corrective action in order to avoid their recurrence
- Measuring and investigating the frequency and seriousness of accidents

Brück strives to eliminate all accidents and to guarantee safety on its premises by:

- Regular checking of equipment and machinery under the surveillance of the Brück Safety Engineer responsible for Health and Safety at the workplace
- Confined spaces are clearly marked areas in all the Company's compound and precautionary signs are used if necessary
- Fire extinguishers and emergency exits are clearly marked
- Walkways are clearly defined and free of obstructions
- There's adequate lighting inside and outside buildings and/ or structures

The observance of the above mentioned rules and regulations are substantiated by the following inspections:

- Annual inspection and auditing by the Berufsgenossenschaft (The German Accident Prevention & Insurance Association) in conjunction with the Landesamt für Arbeitssicherheit (The Regional Department for Occupational Health and Safety)
- Annual re-auditing by the TÜV (Technical Inspection Organization, operating among others in the fields of Industrial Services and Product Safety and Quality)

#### **ENVIRONMENT PROTECTION:**

Brück has recently expanded its company premises. Thereby it has accepted the challenge of protecting nature and the environment and fulfilling the obligations presented by today's ecological principles and demands.

Before Brück was given the permission to expand its factory premises it had to submit a detailed plan of the extension project to the *Landesamt für Umweltschutz* (Regional Department for Environmental Protection). This department thoroughly keeps all activities regarding the environment under strict surveillance.

But already over the last few decades Brück has invested large sums in order to reduce dust and noise emissions. So that even before new facilities were planned, the demands set by legal requirements were taken into consideration and in many cases exceeded.



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**Brück has adopted the following guidelines for its environment compatible product policy:**

- Marketing products whose environmental impact is as low as reasonably possible
- Promoting environmentally friendly recycling of steel
- Anticipating legal and regulatory requirements

At all times we are committed to open, factual and comprehensive information and communication with all our employees, customers, authorities and the interested public with regard to the environmental effects of our facilities and products.

It is our objective to reconcile ecological and economic principles in the manufacture and further processing of our products. Since the steel products can be recycled and have a long life, they have become increasingly environmentally friendly in the course of the development of steel manufacturing technology. Furthermore, we ensure that the various qualities of steel do not have any negative effects on the environment when they are used in their respective fields by our customers.

Brück attaches great importance to a sustainable development, providing a long-term balance between the environment, the economy and social well-being by:

- Continuous improvement in environmental performance, including a permanent concern for the surroundings and a maximum prevention of disturbances
- Development, improvement and application of production methods of which the environmental impact is as low as reasonably possible. This is also achieved by using state-of-the-art machinery and technology
- Development and manufacturing of products which focus on environmental performance during their use and subsequent recycling, in close collaboration with customers and suppliers
- Efficient use of natural resources and energy
- Commitment of each individual in the organization, and management in particular, to environmentally-friendly production and compliance with legislation and Brück's commitments
- Development and environmental awareness through information and training
- Transparent and open communication



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## Department for Environmental Protection

Besides the obligations Brück has taken upon itself the Department for Environmental Protection advises the responsible Brück managers regarding all processes of the individual departments where the environment is concerned. The Department for Environmental Protection is entitled to unannounced visits on our premises in order to verify that Brück adheres to the latest legislative and regulatory developments. Their area of responsibility comprises:

- Inspection of the building site before the start of construction when new facilities are installed or conversion work takes place and giving advice
- Meticulous surveillance of Brück's adherence to rules and regulations
- Controlling recycling and disposal processes
  - Steel scrap is not a waste but a resource for the steel industry, as steel can be recycled endlessly without losing its physical and chemical properties in the process. Brück operates a waste collection area where discarded metal is divided into ferritic, austenitic, aluminium, titan and copper (cables) waste before it is collected for recycling.  
This is accomplished by the regional company *Saarländische Rohprodukte GmbH* which disposes metallic residual substances, prepares these to valuable secondary raw material and supplies steel plants and foundries.
  - Brück's paper waste is also recycled as it is customary in Germany since many years.

At Brück the controls focus primarily on the following internal and external measurements in addition to the already mentioned ones:

- Fire protection requirements
- Deaerators
- Noise protection and sound isolation
- Filter systems in the area of machinery to absorb and filter gases and/ or vapours
- Evaluating the quality of indoor air
- The keeping of a rain storage reservoir
- Appropriate storage of oil (and of other hydrous mediums)
- Nature protection and landscape conservation
- Planting vegetation and erecting protective barriers to shield the vicinity from noise

Brück is aware of its responsibility with respect to the interests of customers, employees and the town council. It knows that priority is to be given to satisfying the interests of these groups, as well as to meeting contractual and legal requirements. As far as the organization is concerned, Environmental Protection belongs to the section headed by the Manager of the Technical Department as the person with overall responsibility for the environment.

Saarbrücken in May 2006, the Board of Directors