



THE POLICY OF DONALAM S.R.L. ON OCCUPATIONAL HEALTH, SAFETY AND ENVIRONMENT

Donalam SRL has as main activity the manufacture and trading of heavy metal bars obtained by hot rolling.

According to the strategic direction, the top management considers that the basic principles to be observed in its activities are: the conformity and protection of environment for a safe and sustainable growth, moreover to reduce the utilization of natural resource and the emission of CO2 into the atmosphere, to prevent work related injury and ill health to workers and to provide safe and healthy workplaces.

In the year 2020, top management decided maintaining the environmental management system according to SR EN ISO 14001:2015 and the occupational health and safety management system according to SR ISO 45001:2018, systems that provide the opportunity to comply with principles mentioned, and expresses its commitment to achieve the policy appropriate to the context of the organization, through the strategic objectives:

- Integration into the business management of the concepts of health, occupational safety and environmental protection;
- Protecting the environment and pollution prevention by addressing the identified environmental risks for a safe and sustainable growth;
- Preventive assessment of all the risks inherent to activities carried out within the company, in order to implement appropriate measures for the prevention of injury or occupational diseases, and to minimize as much as technically possible the severity and likelihood of such events in order to ensure safe and healthy workplaces
- Compliance with legal and other obligation, that the organization has subscribed, in regard to health, occupational security and environment, by continuous updating and timely verification of the implementation of relevant requirements applicable;
- Driving the continuous and efficient communication with all stakeholders (employees, customers, contractors, suppliers, organizations, institutions, citizens, neighborhoods) and information/training, where necessary, in connection with health, security and environment issues in order to secure a high level of awareness and to ensure worker consultation and participation;
- Reducing the significant environmental impact arising from the significant environmental aspects, through the sustainable use of resources, climate change mitigation, minimize wastes and the use of best available techniques, economically feasible, in those specific stages in the life cycle of laminates, which are under control of the organization;
- Continuous improvement of management systems for enhancing the environmental, health and safety performance.

This policy shall be subject to annual review to ensure suitability with the activities performed and the organizational context.

Date: 20.01.2020

Director,





DONALAM

AFV BELTRAME GROUP

STATEMENT ON THE SCOPE OF THE ENVIRONMENT MANAGEMENT, OCCUPATIONAL HEALTH AND SAFETY SYSTEMS (EOHS)

Strategic line of Donalam SRL:

The top management has established a EOHS policy for the year of 2020 and operates by the management, basic and support processes for the fulfillment of the objectives undertaken by the policy and for the increase of the EOHS performances.

Elements that can influence the results of the organization:

Analyzing the context in which it operates, the organization has identified the concerned parties, the needs and expectations thereof, the compliance obligations of the organization, it has updated the limits of the management systems and has establishes the scope of the environment management, occupational health and security systems for the year of 2020.

Products and services of the organization:

The organization has implemented and maintains the EOHS management systems according to SR ISO EN 14001:2015 and SR ISO 45001:2018 standards for the processes, activities and services related to the production and sale of hot-rolled sections, performed on the site of Donalam SRL, site where it can exercise control.

The products are intended for the processing industry and constructions. The obtained products are sold on the Romanian market in a proportion of 10 % and the rest of them outside Romania.

Activities of the organization:

The main activity is comprised in the NACE code 2410 - Manufacture of basic iron and steel and of ferro-alloys.

The performed authorized secondary activities are comprised in the NACE codes:

- 2561 Treatment and coating of metals
- 2562 Machining
- 3831 Dismantling of wrecks
- 4672 Wholesale of metals and metal ores
- 4677 Wholesale of waste and scrap
- 5210 Warehousing and storage
- 5224 Cargo handling
- 7120 Technical testing and analysis
- 8299 Other business support service activities n.e.c.

The category of activity in the Directive of Industrial Emissions is 2.3. Processing of ferrous metals: a) exploitation of hot laminators with a capacity of over 20 tons of gross steel per hour;

The maximum authorized production capacity is of 450,000 tons of heavy rolled sections per year.

Work related activities, planned or executed are those associated with basic processes: production planning, supply, lamination, adjustment with packaging, marketing (including expedition logistics) as well as support and management processes: maintenance, human resources, financial, IT, environmental protection and health and safety, quality assurance, technical service, opex.

Activities are analyzed for hazard identification and risk assessment by departments, on workplaces. All the activities carried out on the departments of the organization chart are included in the job descriptions of the workers, and those that require special facilities and specializations are provided by the outside companies in accordance with the documented information that ensures their control.



The outsourced activities (with authorized or accredited companies) are those related to the security of the site, transportation, occupational medicine, measurement of the pollutions released in the environment, implementation of the obligations regarding the extended liability of the producer related to the management of packaging and packaging waste, collection, recovery / disposal of wastes, payroll and certain maintenance activities.

Address:

The activity is performed at the head office of the organization in Calarasi, 162, Prelungirea Bucuresti St., Romania. Parent company: AFV ACCIAIERIE BELTRAME SPA- ITALY.

Compliance obligations:

The mentioned activities are authorized according to the legal obligations in terms of environment, occupational security and health and emergency situations.

For the implementation of projects with a significant impact on the environment, which requires site organization or approval in the field of emergency situations, permits, agreements and building permits are obtained from the competent authorities.

The organization declares to the Environmental Fund Administration the packaging of the rolled sections marketed in Romania.

Donalam SRL undertakes the implicit compliance obligations of the relevant concerned parties, after the analysis of the requirements, of the applicable law and of the possibilities of the organization, after the risks and opportunities of these obligations have been approached.

Relevant stakeholders:

For Donalam SRL, they are the local and national legal and regulatory authorities and the parent company, the customers, providers, neighbours, the community and the local media, the workers.

The expectations of the local and national legal and regulatory authorities are implicit, the parent company has internal standards and default rules for all the organizations in the group, the customers send questionnaires, the providers send requirements in the contracts, which are accepted or not depending on the possibilities of the organization. The expectations of the community and of the neighbours are known in the public debates or by the appearance of articles related to the environment and health and security in the media.

For the workers, there are questionnaires, notification forms, which are registered, analyzed and for which a reply is provided, as well as by the representatives in the Occupational Safety and Health Committee established at the organization level.

For the internal stakeholders, the Manual of the integrated EOHS management system is provided, detailing all the basic, support, management processes and the scope of the management systems.

Date: 21.01.2020

Director,





COMMUNICATION ON ENVIRONMENT, OCCUPATIONAL HEALTH AND SAFETY AND PRODUCT SUSTAINABLE LIFE CYCLE

Donalam SRL is strongly committed to supply the market with products that do not have a significant negative impact on the environment throughout their life cycle. Therefore, all raw materials used for rolling comply with REACH, RoHS and radioactivity requirements. During the production process, consumption and emissions are monitored and legal compliance obligations are respected. Our packaging uses materials that suppliers have declared compliant with the provisions of Directive 94/62 / EC of the European Parliament and of the Council on packaging and packaging waste with all subsequent amendments. Please, collect the packaging waste separately for each type, as marked on the product label, and recycle them. At the end of the life cycle, purchased products can be recycled as scrap iron and steel, waste code 17 04 05. Thus, we are convinced that the conditions for a circular economy and sustainable development will be ensured.

The products provided by Donalam SRL are heavy steel bars, and therefore require attention in handling and storage, due to mechanical risk factors (sliding, rolling, falling, deviation from the normal trajectory of lifting equipment, lack of correlation between load weight and load calibration of the binding element, etc.) that may lead to injury by hitting, gripping, crushing.

Top management of Donalam SRL demonstrates its commitment to maintain integrated management system and to continuously improve its effectiveness, by setting environmental, occupational health and safety policy 2020, which you may find attached, by the side of statement on the scop of the EHS management systems.

Director, -

