



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 an EOHS policy for the year of 2024 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 2024.

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 almost 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:

- 4322 - Plumbing, heating, and air-conditioning work
- 3320 - Installation of industrial machinery and equipment
- 7739 - Rental and leasing of other machinery, equipment, and tangible goods n.e.c.
- 7732 - Rental and leasing of construction machinery and equipment
- 6820 - Renting and subletting of own or leased real estate
- 6810 - Purchase and sale of own real estate
- 3832 - Recovery of sorted recyclable materials
- 8299 - Other business support service activities n.e.c.
- 7120 - Technical testing and analysis activities
- 5224 - Manipulations
- 5210 - Storage
- 4677 - Wholesale of waste and scrap
- 4672 - Wholesale of metals and metal ores
- 3831 - Dismantling (disassembly) of end-of-life machinery and equipment for material recovery
- 3511 - Production of electricity
- 2562 - General mechanics operations
- 2561 - Treatment and coating of metals
- 2410 - Production of primary ferrous metals and ferroalloys
- 3312 - Car repair

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.



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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, energy management.

Address:

The activity is performed at the head office of the organization in Calarasi, 246 R, Prelungirea Bucuresti Street, 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, neighbors, the community and the local media, the workers, by the representatives in the Occupational Safety and Health Committee established at the organization level.

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 neighbors 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: 09.01.2024

Director,

