



THE FUCHS PETROLUB GROUP |

GUIDELINE – OCCUPATIONAL HEALTH AND SAFETY (OHS) AT FUCHS PETROLUB AG



A. BACKGROUND

At FUCHS PETROLUB AG, it is our core belief that occupational health and safety, environmental protection, product and process quality and commercial efficiency are factors of equal importance in achieving our corporate objectives. The health and safety of our employees, customers and stakeholders plays a fundamental role in our business decisions.

The FUCHS Code of Conduct already states that FUCHS complies with the fundamental work-related principles and rights laid down in the International Labour Organization's core labour standards. FUCHS "is committed to providing safe working conditions and conforming to regulations for environmental protection and occupational health and safety. Since each employee is co-responsible for occupational health and safety in his/her job, it is essential to comply with, and observe these regulations in the workplace, so as to foster safe working practices and minimize health risk."

Based on this business perception, FUCHS has decided to set up unified documented Occupational Health and Safety (OHS) rules to pro-actively secure all FUCHS employees from negative impacts. This standard has to be guaranteed by all FUCHS companies.

FUCHS decided for a pragmatic top-down project approach. The foundation is to set up and release OHS rules centrally from the headquarters at Mannheim. These rules are documented below and at a high level consolidate the FUCHS Group's OHS objectives, beliefs, ethics and responsibilities. Apart from the FUCHS OHS rules, every company must follow non-restrictively country-specific laws and regulations with regard to OHS.

The OHS rules are obligated to all FUCHS employees and external staff working at FUCHS' sites. Also visitors must follow FUCHS' OHS rules.

B. PREFACE

Responsibility for OHS related issues remains ultimately with Managing Directors. They have to make sure that all FUCHS employees are obliged to adhere strictly to regulations and instructions set by law, company or other relevant authorities. In addition, they have to ensure the greatest possible protection for employees in the workplace. Moreover, every FUCHS employee should promote and share responsibility for occupational health and safety considerations within his or her area of activity. Also they must take the necessary precautions to protect themselves and their colleagues against risk.

Therefore, for all FUCHS employees it is strictly prohibited to work and drive under the influence of mind-altering substances, e. g. alcohol, illegal drugs or any other drug/pharmaceutical.

The co-operative efforts of both employers and employees will help in establishing and maintaining a safe and healthful work environment.

Developing a comprehensive health and safety program requires the identification of hazards in the workplace ("**hazard assessment**"), which will vary from country to country and from workplace to workplace. Potential hazards might be moving objects, fluctuating temperatures, high pressures, rolling or pinching objects, electrical connections, sharp edges and overexposure to harmful chemicals or dust.

An important component of all OHS efforts is to provide FUCHS employees with a proper training on OHS issues. Every employee must participate regularly on a training session. New employees must be carefully instructed on OHS regulations. The participation on training sessions must be documented. In this context, all representatives responsible for certain tasks and issues in a company (e. g. safety inspector, officer for dangerous goods) must be dedicated and duly trained.

C. OCCUPATIONAL HEALTH AND SAFETY RULES

Occupational health and safety issues are different in each country and location with regard to the local circumstances, laws and regulations. The following rules are not qualifying for completeness rather than listing some general rules on OHS. Definitely, there will be more and additional OHS related issues which are of interest to FUCHS, but not discussed in this paper. As a result, all companies are advised to develop their own tailor-made OHS rules and regulations.

Personal Protective Equipment (PPE)

Responsible management must determine which personal protective equipment is necessary for particular activities.

Appropriate PPE is required depending on the type of work - either on a FUCHS site or at the customer's site – e. g. laboratory coats or appropriate clothing, safety glasses with side shield or safety shoes.

Chemical Safety

When handling chemicals, some simple guidelines should be followed. It is mandatory to be familiar with the chemical safety information for each chemical prior to handling. A MSDS (**M**aterial **S**afety **D**ata **S**heet) for the particular chemical should be available for an appropriate handling. When working with chemicals, the instructions stated in the MSDS must be strictly followed.

If someone is exposed to a hazard, the MSDS must be seen for guidance how to react.

Emergency Response

Each company should develop an emergency response plan. This plan should include procedures for responding to weather emergencies, fires and other situations requiring a facility evacuation.

Facilities should also implement an injury response procedure. As part of this procedure, the company will have implemented a first-responder team that has first-aid training. Employees must respond to employee injuries in a manner that is appropriate for their training and the circumstances. Where necessary, professional medical assistance must be involved.

Plant Safety

Production facilities and technical equipment must be operated in such a way as to ensure the safe handling of raw materials, intermediates, products and waste. Processes must be optimized in order to mitigate hazard potentials and risks. The scheduled maintenance cycles for machinery and technical equipment must be strictly followed. Safety concepts must be drawn up for all technical equipment, including regular inspections. Additionally, technical measures must be taken to ensure that any malfunctions can be properly dealt with and their effects localized.

When an accidental release (chemical spill) occurs, some guidelines must be strictly followed. Appropriate spill control materials should be kept available and accessible where chemicals are stored. Also adequate PPE must be worn whenever responding to a spill. Spill must be collected to the extent possible and the material must be kept out of traffic and waterways. Spilled material and absorbent must be collected and disposed properly.

FUCHS is committed operating its facilities safely and avoiding any exposures through fire. Nevertheless, it is not possible to predict every risk and as a consequence, a fire might occur. Therefore, it is necessary to implement a contingency plan in case of fire which includes appropriate measures to mitigate the fire exposures.

Logistics

Risks during the storage and transport of goods must be reduced to a minimum. People, property, the environment and company assets must be protected from fires, explosions and hazardous releases resulting from improper storage.

Hazardous substances must be stored in properly labelled packaging or containers and according to the MSDS storage instructions. All stored goods must be one-to-one identifiable. Packages containing hazardous materials that might react dangerously with one another will not be stored next to each other or in a manner that would allow dangerous interaction in the event of leakage.

When handling hazardous substances, the relevant regulations must be adhered to. Warehouses must be secured from unauthorized access.

Employees should receive training on responding to chemical releases.

For the transport of goods it is essential to select suitable logistics partner, carriers, transport routes, means of transport and packaging.

Hazardous substances must be carried in properly labelled packaging or containers. Unauthorized persons must be prevented from gaining access. When carrying hazardous substances, the relevant regulations must be adhered to. It is also mandatory to carry information about the products transported, e. g. transport emergency cards (road) or MSDS'.

Carrying chemicals in an own vehicle requires that an adequate amount of absorbents and other containment materials are also carried.

Off-Site Services

Working off-site FUCHS can be dangerous and so great care must be exercised. Basically, FUCHS employees must follow customer safety rules while working at customer's site. Moreover, in specific fields of work rules must be followed without exceptions.

In particular, taking samples from certain machinery requires standard caution. As a result, no FUCHS employee is allowed to uncouple, disconnect, or in anyway work on the pressure side of any active or working hydraulic system. If working on the pressure side of such a system becomes necessary, the FUCHS employee is asked to involve the customer's personal.

In addition to the previous paragraph's direction, no FUCHS employee is allowed to perform maintenance on any customer equipment unless they have received very specialized training and have received specific authorization from the company's managing director. As part of this prohibition, employees may also not enter confined spaces.

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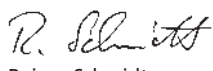
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