

NO	ACTION	DUE DATE*
	Management Systems and Assessment	
1	a. Develop and maintain a regulatory permit register and establish a follow-up system for all facilities. b. Develop and maintain existing Health, Safety and Environmental (HSE) management function to ensure consistent HSE approach at corporate level and performance tracking throughout operations in all locations. c. Provide IFC with the Environmental and Social Review documented in accordance with the IFC's Performance Standards for the two new sites in Bosnia. d. Incorporate IFC's Performance Standards on Social and Environmental Sustainability into the existing management systems and procedures and ensure that organization and responsibilities are defined in writing. (In addition to the on-going operations, all new projects and changes shall be subject to the environmental and social review starting from land acquisition process to the operational phase.) e. Establish a 5-year roadmap to complete corporate ISO 14001 and OHSAS 18001 certification at all locations of operations in Balkans.	Mid 2012 Mid 2012 Prior to acquisition of lands End 2012 Mid 2012
	Labor and Working Conditions	
2	a. Develop documented EHS and labor assessment and management directions for sub-contractors according to the local regulations and IFC's requirements in order to ensure that occupational health and safety rules and other conditions such as, minimum age, avoidance of excessive over-time working are controlled and respected. b. Develop and maintain a social dialogue framework with suppliers at risk for enhanced communication, control and mitigation of potential risks related to labor and working conditions.	End 2012 Mid 2013
3	a. Undertake a review of all sites in terms of radioactivity level detection and alarm systems and set up a priority order of implementation of these systems per locations taking into account risk level of the sites and regulatory requirements. b. Establish radioactivity level detection and alarm systems at the entrances of all facilities, defined and prioritized based on the risk review and regulatory requirements. Ensure that verification by fixed and manual detectors are systematically conducted in the process of the receipt of scrap and recorded in accordance with national regulations, IAEA standards and guidelines. c. Improve the existing screening mechanism at sites to avoid uncontrolled acceptance and handling of hazardous materials that are potentially present in supplied scrap. These may include explosive materials, asbestos, PCBs, CFCs, concentrated acids or alkalis, toxic compounds such as mercury. d. Provide adequate training to all relevant employees and necessary guidance to contractors and suppliers at risk on detection and appropriate handling of hazardous materials as listed above.	Mid 2012 End 2012 - According to defined priority order from 3a Mid 2012 Mid 2012
4	Provide better segregation and marking of pedestrian ways from operational areas of machinery, lifting equipment and vehicles at all facilities.	End 2012
5	Make a specific assessment on machine guarding at all operations and implement upgrading program accordingly to protect employees from moving parts of the machinery.	End 2012

6	Ensure that documented preventive maintenance program and register for all buildings, utilities, treatment systems and safety critical equipment at each site. Define control frequencies by certified professionals. All preventive maintenance activities will be kept recorded.	End 2012
7	a. Complete establishment of emergency teams at each facility so as an adequate number of employees are trained to manage emergency conditions and each work shift is adequately staffed by trained employees. b. Develop and maintain a register of Emergency Management Plans to be regularly reviewed and updated.	Mid 2012 Mid 2012
8	Develop the existing vehicle safety program as defined in the ESRS and in line with the local regulations as a minimum.	End 2013
Pollution Prevention and Abatement / Resource Conservation		
9	a. Review ground impermeability conditions at all locations and implement an improvement program based on prioritization according to risk determination and regulatory requirements. b. Undertake a review of all sites in terms of presence of oil and water separators and implement a program to complete installations within a defined timeframe based on prioritization according to risk determination and regulatory requirements. c. Ensure appropriate secondary containment is in place at each facility where oil and other hazardous chemicals are stored.	End 2012 End 2012 End 2013
10	Undertake a review of de-pollution mechanisms for Life-End-Vehicles (LEV) removing all liquid and other forms of hazardous materials. Set-up a program to develop de-pollution solutions at all relevant areas possessing LEV disposal licenses, primarily in Belgrade Serbia facility, as planned. Technology currently used at Zagreb/Croatia will set example to other facilities and will be as a minimum in line with the local regulatory requirements from each country.	End 2012
11	Review process air emission monitoring programs at all areas and ensure that consistent programs are established particularly to monitor particles at all areas of operations in the Region, as a minimum in line with the local regulations.	End 2013
12	Review water monitoring programs and ensure that consistent programs are established at all locations in the Region, as a minimum in line with the local regulations.	End 2013
Community Health, Safety and Security		
13	Review provisions for controlling and limiting public access to the scrap yards and processing facilities and make improvements where necessary (e.g. installation of robust fencing, barriers, alarm systems).	Mid 2012

*or earlier if enforced by the regulatory authorities.