


POLICIES AND PROCEDURES 	SUBJECT Environmental Health & Safety Policy	Number Issue
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**WERNER INTERNATIONAL HOLDING S.À.R.L.
AND ITS SUBSIDIARIES**

Environmental Health & Safety Policy

1.0 STATEMENT OF POLICY

It is the policy of Werner International Holding S.à.r.l. and its subsidiary companies (collectively, the “Company” or “WernerCo”) to design, manufacture and market its products and services in a safe, environmentally sound and socially responsible manner. This includes consideration of the impact of our actions on the environment and on the health and safety of our employees, customers and the public.

In support of this policy, WernerCo will develop and implement management programs that conform to the following principles:

- Support and nurture a group environmental, health and safety (“EHS”) ethic so that EHS concerns are addressed at all appropriate levels of decision making;
- Comply with all applicable EHS laws and regulations. WernerCo regards existing laws and regulations to be the minimum required for its operations. In absence of applicable laws or regulations, WernerCo will apply sound EHS management practices;
- Train associates in safe operating practices and in the safety and environmental requirements applicable to their areas of responsibility;
- Strive to develop effective and sustainable solutions to EHS challenges and to minimize adverse impact on the air, water and land through pollution prevention and energy conservation;
- Integrate safety, health and environmental objectives into applicable business functions;
- Periodically survey facilities for compliance with applicable laws and regulations, as well as compliance with corporate and operating unit policies; and
- Strive to ensure effective EHS programs are continually validated and improved through disciplined risk evaluation and strategic planning.

2.0 PURPOSE

The purpose of this policy is to inspire at all levels of the WernerCo organization a commitment towards proper EHS practices and to encourage all WernerCo associates to adhere to EHS policies, procedures and laws.

3.0 SCOPE AND RESPONSIBILITIES

3.1. This EHS policy is applicable to all associates and each Business Unit (defined below) in the WernerCo enterprise. For purposes of this policy a “Business Unit” shall mean a manufacturing plant or facility, a direct or indirect subsidiary of Werner International Holding S.à.r.l., a commercial sales or manufacturing division of the Company, or a functional area or department as applicable.

3.2. Through its Advisory Committee, the Board of Directors of Werner International Holding S.à.r.l. oversees EHS policy and compliance as part of its overall corporate governance activities. This governance responsibility may be delegated to an EHS committee and its members (see Section 4.1 below).

3.3. Each Business Unit is responsible for implementing this policy, allocating adequate resources and developing EHS programs and training of associates. The EHS Committee shall be responsible for facilitating participation in training and sharing of best practices across the WernerCo enterprise.

3.4 Day-to-day responsibility for EHS management resides with the Business Unit staff. On-site contractors, suppliers and vendors to WernerCo are responsible for integrating sound EHS practices into their activities, products and services and acting in a manner consistent with this policy.

4.0 ORGANIZATION AND EHS MANAGEMENT SYSTEM

4.1 An EHS Committee comprised of members chosen by the Company’s Strategic Team, which should include (a) EHS coordinators or responsible managers at various Business Units, and (b) members from the Company’s Legal, Internal Audit, Risk Management and Human Resources functions, may be established to assist in establishing policies and programs, reviewing WernerCo’s EHS performance with Company and Business Unit management on a periodic basis, and achieving compliance with this policy.

4.2. Each Business Unit shall develop and operate in compliance with an EHS management system that is consistent with the principles of this policy. The EHS

management system includes development and implementation of programs and procedures that cover a broad range of topics, including:

- Pollution prevention, environmental management, and integrated permitting;
- Air emission management;
- Water supply management;
- Wastewater discharges management;
- Waste management;
- Hazardous substance management;
- General safety and health management;
- Personal protective equipment;
- Dangerous substances;
- Physical hazards;
- Mechanical hazards;
- Fire protection;
- Accidents and incidents; and
- Emergency planning and response.