

C | H | A | R | T | E | R

HEALTH & SAFETY
AT WORK

suez

CHARTER

HEALTH & SAFETY
AT WORK

In agreement with the various social partners, I have decided to introduce a Health & Safety Charter to the SUEZ Group.

Health and safety at work are key components that contribute to sustainable development. They are therefore of fundamental importance to our Group and central to our core values.

As a common vision in our divisions, this Charter sets out a framework of requirements for continuous improvement to our performance in this area, beyond the strict application of laws and regulations.

I therefore ask that all divisional and company Presidents make a personal commitment and appoint a supervisor to deal effectively with the application of this Charter and its code of conduct in close association with line management and staff representatives.

The Charter applies to each individual in each of the Group's companies worldwide. It must be sent to, explained to and implemented by everyone.

I personally pledge to follow up developments in practices and results and will continue to consistently support our efforts.

Gérard Mestrallet

A handwritten signature in black ink, appearing to read 'G. Mestrallet', with a stylized flourish extending to the right.

The SUEZ Group's General Management and the European Consultative Committee made up of trade union and employee representatives have decided to introduce a Charter for Health and Safety at Work. The Charter will be implemented in each division using the methods and documents suited to that type of activity.

OUR CHALLENGES

The Group needs to achieve and maintain good results in health and safety at work, as a result of the major challenges facing us:

- **Protection of both physical and mental integrity and health**

Being a responsible Group, SUEZ carries out its activities while ensuring the physical and psychological health and integrity of its employees.

This concerns not only the men and women working for the Group, but also our customers, partners, subcontractors and more generally all those affected by our activities.

- **Professionalism**

Professionalism is one of the foundations on which the Group's reputation is based. Professionalism requires skill, know-how, rigour, pride in a job well done, anticipation and innovation.

Safety is at the core of each of these requirements.

- **Competitiveness**

Our health and safety performance is one of the key elements in assessing our global performance and is a real differentiation factor. Increasingly, it is a customer requirement.

Safety has a significant influence on our profits. Preventing risk to health and safety at work preserves our human, intellectual, material and technical assets and boosts our image in the eyes of customers and public authorities.

It preserves our organization, saves time and reduces our social security contributions and insurance premiums.

A focused and effective prevention policy contributes to the management of civil and criminal liability. It guarantees the future of our businesses and workforce, their families and the communities concerned. Consequently, our safety results affect the development and sustainability of our activities.

- **Social dialogue**

Health and safety at work are collective challenges for everyone, regardless of their position in the company.

Although the ultimate responsibility falls upon management, each one of us at our level is responsible for his or her own behavior, decisions and actions.

Health and safety at work is managed through dialogue, particularly through the Group's consultative bodies. This is our most direct way of acting on a daily basis to achieve social cohesion and solidarity.

OUR COMMITMENTS

- **A Health & Safety at Work code of conduct**

The Group has drawn up its Health & Safety at Work code of conduct which must be integrated into the management system in all companies.

This code of conduct requires that each company implement a dynamic policy to achieve continuous improvement through:

- an initial review covering the company and the risks involved,
- objectives and a plan of action,
- the determination of assignments and resources,
- the launching, managing and monitoring of activities,
- regular reviews.

- **A Health & Safety at Work Steering Committee**

The Group has set up a Health & Safety at Work Steering Committee directly attached to the Group's Executive Committee.

This Steering Committee, made up chiefly of members from Management and the European Consultative Committee, will ensure that we comply with the Code of Conduct and our commitments.

It will monitor our Health and Safety performance and meet any legal requirements or recommendations from the International Labour Organisation.

- **A commitment for all**

We will all familiarize ourselves with the Charter and the code of conduct, individually contributing to the implementation process and thus helping to achieve the Group's common objectives.

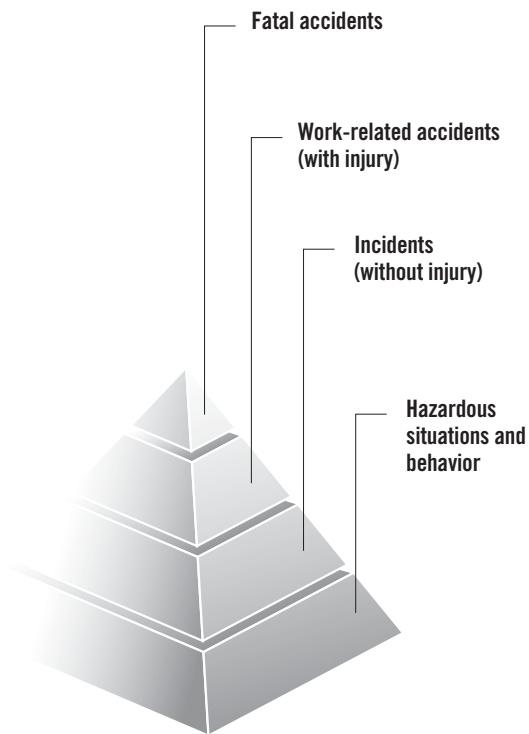
CODE OF CONDUCT

HEALTH & SAFETY
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I. SUMMARY

As the cornerstone of the SUEZ Group's Health & Safety policy, the Charter defines the framework in which the Group now intends to move ahead in order to meet its obligations and assume its responsibilities. The prevention of accidents and risk management are based on the fact that the numbers of occupational accidents, incidents and hazardous situations are related.

Our policy is to significantly reduce the number of accidents and illnesses in the long term by cutting down on both hazardous situations and behavior.



II. PROCEDURE

Spurred on by this finding and the challenges mentioned above, all companies and units must adopt the following continuous improvement approach based on its management system:

A. Initial Review

Hazards must be regularly identified and risks of a human, organizational, technological and material origin must be analyzed and assessed in a systematic, concerted and multidisciplinary manner in all businesses and workstations.

An initial review of the organisation, equipment and human resources set up in order to address these risks, must also be carried out. It must reflect the regulatory context, corporate strategic guidelines and the experience acquired.

The economic evaluation of risks forms part of this analysis.

Three types of well-known or emerging risks need to be taken into account:

- Risks introduced into the company via contracts with external partners and companies at the time of acquisition, investments, implementation of new concepts, new technical practices, new facilities, hiring of new employees, etc.
- Risks generated within the company through our internal processes, including those caused by deterioration in a situation or by an emergency.
- Risks connected with external products and services.

These risks may concern any event of an accidental nature and any damage to physical or mental health.

Considering the development of new techniques and knowledge, the Group pledges to remain updated on emerging risks and to assess their consequences on its health policy.

B. Setting objectives and planning action

Based on the initial review, business unit managers must define the objectives for their organizations and plan any action to be taken, in association with staff representatives.

The action plan should take into account the size of the company and the type of risk relative to its activities. The plan is in written form, reviewed annually and notably includes:

- the objectives and their performance indicators;
- a description of planned preventive actions, particularly as regards risk analysis, including economic, social and cultural factors, the ALARA (As Low As Reasonably Achievable) principle being one of the major reference points used by our companies;
- a description of human, organizational and technical resources;
- a program to monitor implementation of the plan (internal and external audits, etc.).

This action plan is drawn up for a minimum period of three years.
All employees are notified of the plan.

This action plan should be considered as a commitment.

This type of approach is multi-disciplinary based on the following fundamental criteria:

B1. The preferred hierarchy of risk control

The preferred hierarchy of risk control principle stems from the concept known as “in-depth defense” which consists firstly in trying to eliminate risks at source, then, choosing preventive measures, if possible with a back-up system, to reduce the probability of an accident occurring. It requires choosing the preventive measures in the following order:

1. avoiding, eliminating or reducing the risk (if possible at source),
2. introducing collective protection,
3. wearing personal protective equipment.

When choosing protective measures, it is necessary to prioritize the most effective ones to reduce the consequences of accidents on people and equipment.

In this respect, the ALARA (As Low As Reasonably Achievable) principle enables our companies, wherever they may be, to optimize their choice of preventive and protective measures based on their own particular activities.

B2. Experience sharing and feedback

The principle of experience sharing and feedback includes not only sharing good practices and the know-how accumulated by the Group, but also the analysis of accidents and near-accidents and the monitoring of health & safety at work. This sharing is one of the pillars of continuous improvement in our occupational health and safety standards.

C. Determining the assignments and resources

The Group's business unit managers must ensure that the activities for which they are responsible do not endanger the health and safety of the people concerned.

They define, supply, organise and implement the resources to achieve this goal and check their effectiveness.

It is their responsibility to be aware of the provisions set out in the Charter and the code of conduct and to apply these to their units. While holding responsibility at all times, part of their powers may be delegated to other parties, but ultimately they keep control.

As part of the health and safety at work policy in their unit, they determine how to distribute and coordinate health and safety duties within:

- the general management structure,
- the site or project management,
- the workshop or team leaders,
- the health and safety advisors,
- occupational health

as well as each person's general obligations.

They also ensure that the joint bodies with responsibility for health & safety operate correctly.

The resources are mainly:

- employees dedicated specifically to organizing and supporting the health and safety at work function,
- management of abilities,
- up-to-date documents and procedures,
- adapted and well-maintained equipment,
- a monitoring, inspection and auditing program,
- measurement and performance indicators (frequency and seriousness rates for work-related accidents, etc.),
- a communications policy,
- a crisis management plan.

D. Taking action and measuring its effectiveness

The managers run this operation on a daily basis. Their credibility depends on their exemplary behavior.

Managers will implement the actions decided upon and follow the principles stated below:

- Make everyone accountable for their actions and any consequences resulting on the health and safety of their colleagues, clients and the public.
- Define each person's duties regarding safety, make sure that these are understood and that the necessary skills (training and experience) are acquired.
- Provide everyone with the resources to accomplish their mission with the help of skilled people, a safe organizational structure and provisions, suitable material resources that are well maintained.
- Ensure that the health & safety criteria stated in the Charter and the code of conduct are adopted when selecting, informing and coordinating unit subcontractors.

- Pay special attention to information and the induction, training and integration of newly recruited, transferred or temporary staff.
- Encourage everyone to report any risk situation freely.
- In the event of serious or immediate danger, anyone directly affected will be allowed to leave their workstation or the dangerous area, without prejudice.
- Allow all staff to keep their skills up-to-date, particularly by allowing them to take an active part in the training programmes offered.
- Take into account in employees' personal assessments the way in which each person carries out their duties and achieves their occupational health and safety objectives.
- Give assistance to an employee or manager who is involved in legal action regarding health and safety as a result of his occupation.

E. Review in order to move ahead

Business unit managers must review their management systems and occupational health and safety indicators at least once a year.

This review must be communicated in an appropriate way to the employees or their representatives as well as to the various Group bodies. Here are the basic points which must be included:

- analysis of organisational, regulatory and technological developments with regard to safety,
- analysis of comments and malfunctions,
- result of audits and monitoring of corrective actions,
- indicator follow-up,
- improvement's decided upon.

The health and safety bodies made up of employee representatives and members of management work together to set out all preventive measures and assess them. They are properly informed and trained so as to fulfill such duties.

III. THE GROUP HEALTH & SAFETY STEERING COMMITTEE

The Group Health & Safety Steering Committee, reporting directly to the SUEZ Group Executive Committee, is responsible for monitoring compliance with occupational health and safety performance indicators and development of the maturity and improvement of the Group's performance.

It is made up principally of members from Management and the SUEZ Consultative Committee and reports once a year to the SUEZ European Consultative Committee at its plenary meeting.

The Steering Committee will periodically report to the Group Executive Committee on the results achieved in relation to the objectives set and will make all necessary changes to observe the Charter and code of conduct.

INSERTS

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Physical and mental health: a few good practices to inspire companies

Protecting our employees' physical and mental health may require specific preventive and protective measures, taking into account social, economic and cultural parameters and recommendations made by professional bodies. These need to be chosen after consultation with the work medical departments and those qualified in the areas of social health and protection.

Long-term employee health protection particularly requires that exposure to occupational illness risks be restricted by following the ALARA (As Low As Reasonably Achievable) principle.

In this respect, particular emphasis must be placed on restricting work strain and exposure to risks resulting from physical, chemical, biological, carcinogenic and mutagenic agents.

Attention must also be paid to factors that could worsen the psycho-social workload or unfavorably affect employees' mental health.

As regards reducing the psycho-social demands of work, we need to take account of:

- specific risks connected with different organizations such as working alone, shift work, night work, etc.,
- ergonomic risks at workstations,
- risks connected with driving and maneuvering vehicles and handling equipment,
- the risk of wrong diagnosis may result from an operator's mental strain when supervising complex operational processes,
- risks specific to some employees such as pregnant women, young employees, staff allocated to a suitable workstation, temporary staff, etc.

In addition, measures must be taken to prevent, limit and deal with violence and mental or sexual harassment at work.

At the same time, a program for checking a person's ability to work at a given workstation and for medical observation is introduced taking into account the results of risk analysis. This program also provides for an analysis of relevant employment opportunities available to victims of work-related accidents.

This is regularly adjusted based on the knowledge and development of risks of an occupational origin, on the employment conditions and the populations affected.

Finally, each entity may develop specific programmes as required, whilst showing respect for privacy and the wishes of employees, for example: preparation for expatriation, preventive vaccination, first-aid training, awareness programmes on the risks of smoking, medication, alcohol and drug taking, activities to prevent stress or psychosomatic illnesses.

Managing work-related accidents and near misses: a few helpful recommendations

SUEZ aims to improve its safety standards on an ongoing basis. All accidents, incidents and near misses that affect our employees or third parties shall be analyzed in detail.

The analysis must show the basic causes of any failure detected and determine the appropriate corrective action to avoid repetition.

Greater importance will be attached to analyzing the causes of work-related incidents and near misses and to sharing experience throughout the Group, as they are generated by the same risk factors as those that are at the origin of work-related accidents.

Emergency plan and crisis management: major recommendations

Each SUEZ entity needs to draw up an internal emergency plan for managing crises and ensure that it remains operational on a continuous basis.

The plan describes how to organise crisis management.

It includes all necessary procedures and resources to deal with and control all types of potential foreseeable emergencies such as: personal accidents, operational incidents, fire, various alarms, natural disasters, external attacks, etc.

The aim of these emergency procedures is to:

- introduce an organisational structure that can at all times address abnormal or accidental events effectively,
- limit potential effects as much as possible,
- allow effective internal and external communications that are adapted to the scale of the problem.

If an emergency could have serious consequences on the general public or the environment, the entity will add specific cooperation agreements with public authorities, external emergency services and any organization which can contribute to dealing with the consequences of this situation. The Group regularly informs the units of agreements it negotiates in the field of crisis management.

This emergency plan also concerns our employees and companies in the event of a serious incident or accident occurring in facilities outside the Group.

Suitable exercises must be regularly carried out within the organisation to ensure that emergency plans are constantly operational. These exercises must also include any external organisations involved.

Prague, 23 October 2002

FOR SUEZ:

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