



Environmental protection audit

for MVV Umwelt GmbH

- BPS Mannheim facility -

Introduction

Our companies operate and monitor their plant and equipment independently and under their own responsibility with regard to environmental protection. As a rule they are supported in this in their capacity as operators by independently appointed environmental protection officers in all environmental matters in order to ensure that the plant and equipment is being operated in compliance with the license and that the environmental requirements are also being met.

Furthermore the Management Board of MVV Energie AG has committed its Group environmental protection officers to provide support by means of this audit to the company and its shareholdings and the on-site operators and officers in carrying out their obligations in accordance with the legislation and where applicable to coordinate the necessary course of action.

The objective of this environmental protection audit is to comprehensively protect the Group and thereby its employees against possible dangers, to safeguard the economic capacity of the company as a whole to act and its operating assets and property as well as to avoid potential organisational culpability of its management boards and general managers. The operating of the plant and equipment in compliance with licenses and the law forms the basis for this.

The environmental protection audit does not constitute in the classical sense of the term an audit of a management system according to EMAS (Eco-management and auditing scheme) or ISO 14001. Nevertheless it includes certain elements of these, validated by VDSI, TÜV systems and systems of other institutions, based on the current legal requirements, but always takes into account our own operating experiences and circumstances. The audit was also agreed internally with the Corporate Legal Department.

If all persons involved are willing to critically examine their own actions and to implement any necessary measures in joint consultation, the objective of this audit will be achieved: group-wide cooperation for the benefit of the company and the environment.

Contact persons

The following contact persons from the Corporate Security Department (A-O.2) are available to answer any queries which may arise during the carrying out of the audit:

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Audit procedures

1. The audit is to be carried out on all environmentally relevant plants and equipment, in particular furnaces of all types, water plants, warehouses etc.
2. Comparable objects can be audited as object groups if this simplifies the auditing process and does not lead to misunderstandings.
3. The audit shall be carried out on a recurring basis every three years. The time for the auditing process shall be set by mutual consent on the basis of an audit plan.
4. The audit is suitable for electronic processing. The response fields can be marked with a cross by clicking on them. There is no limit to the length of written comments. Where required, a page break will be inserted automatically.
5. The audit can be carried out on many types of environmentally relevant plants and equipment. It is therefore possible that large parts of the auditing process are not applicable. Nevertheless each individual question is to be answered in order to avoid any unnecessary queries.
6. If multiple entries within one line are unavoidable, e.g. if it makes sense to combine plant and equipment, the comments column can be used for giving explanations. The same shall also apply if a simple cross would lead to misunderstandings on the part of the auditors.
7. In principle it must be possible to make a clear and proper assessment of the situation on the basis of the answers given. It must be stated clearly and unequivocally as to whether the requirements are met or there are deviations from such requirements.
8. Documents requested in the audit are to be sent at the latest with the return of the completed audit questionnaire. Where documents are reviewed their location is to be specified with the names of the persons responsible.
9. The project dossier is an essential part of the audit and must also be filled out. Prior to its return the audit documentation is to be signed by the auditor responsible, the operator or an authorised representative of management.
10. Following its completion the audit documentation must be sent electronically to the aforementioned group officers. The copy of the signed project dossier must be attached as a PDF file.
11. Following the assessment of the results based on the documents sent, audit discussions as well as an on-site inspection the auditor shall receive a preliminary audit report containing recommendations for action. A package of measures is subsequently discussed and agreed.
12. The auditor as well as the operator or management receives the final audit report including the package of measures. The audited company remains responsible for implementing the necessary measures.
13. The Group officers notify the Group Management Board of the audit results in their annual report.

14. The audit contents are to be taken into account at the planning phase for new construction projects in order to avoid the need for adjustments to be made on the handing over of the facility.

Audit contents

1. Facility and description

2. Organisational structure and persons responsible

- 2.1 General
- 2.2 Environmental protection officers
- 2.3 Document control
- 2.4 Licenses

3. External and internal communication

- 3.1 Contacts with authorities
- 3.2 Customer information
- 3.3 Contacts with the public
- 3.4 Internal communication and information
- 3.5 Dealings with external companies, external personnel

4. Further training and instruction

- 4.1 Further training
- 4.2 Instruction

5. Procurement and warehousing

- 5.1 Procurement
- 5.2 Warehousing

6. Waste disposal

- 6.1 Basics
- 6.2 Organisation
- 6.3 Control and security
- 6.4 Documentation and verification

7. Transportation of hazardous materials

- 7.1 Basics
- 7.2 Organisation
- 7.3 Control and security

8. Water pollution control

- 8.1 Basics
- 8.2 VAWS stations
- 8.3 Sewage
- 8.4 Precautions

9. Immission control

- 9.1 Basics
- 9.2 Reporting requirements
- 9.3 Emergency contingency plans
- 9.4 Communication
- 9.5 Prevention of accidents