INEOS OXIDE

Haulier SHE policy

Revision 2024-11-12

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1. ABBREVIATIONS

ADR	European agreement on the international carriage of dangerous goods by road
ALS	Automatic loading system for self-loading at Zwijndrecht
CEFIC	European chemical industry council
eECD	Electronic EFCTO cleaning document
EFCTO	European federation of tank cleaning organisations
eSDS	Extended safety datasheet
FCA	Free carrier incoterm
IDL	INEOS derivatives Lavera
LSR	Life saving rule
LSRB	Life saving rule breach
MOT	Ministry of transport governed vehicle safety test
PPE	Personal protection equipment
SHE	Safety health environment
SQAS	Safety and quality assessment for sustainability tool by CEFIC

2. INTRODUCTION

This document lists the INEOS Oxide safety requirements for site access and (un) loading of products.

Access to INEOS operated sites requires compliance with all policy requirements. Access to external depots requires minimal compliance with the left ‖ marked (=double blue line) requirements

This document or its content must be distributed to the final haulier and driver entering the INEOS Oxide site or external depot. All parties involved in the contracting chain (customer, supplier, subcontracting haulier, …) are obliged to actively assure the policy is well received, understood and respected.

Applicable national or international regulations take precedence over this general specification and any the delivery instructions

3. LIFE SAVING RULES

3.1. List of life saving rules

INEOS applies 7 Life Saving Rules. The purpose of these rules is to avoid serious incidents and potential loss of life. There is zero tolerance for deviation. The following is strictly forbidden:

- ⃠ Working at height without suitable fall protection.
- ⃠ Being under the influence of alcohol or drugs.
- ⃠ Smoking outside the designated areas.
- ⃠ Entering confined spaces.
- ⃠ Entering the danger zone during lifting works.
- ⃠ Working on installations without permission.
- ⃠ Bypassing of safeties or interlocks.

3.2. Practical implementation of life saving rules

3.2.1. Working at height (liquid bulk)

- ⃠ Accessing or climbing onto the topside of a road tanker or tank container <u>without fall protection</u> is strictly forbidden.
- ⃠ A lightweight handrail is insufficient and not acceptable as only protection.

- ✓ Accessing or climbing towards the topside of a road tanker or tank container requires the use of collective fall protection (= adjustable platform or safety cage) <u>or</u> personal fall arrest protection.
- ✓ Where installed adjustable platforms or safety cages have to be used. Drivers must stay within the perimeter of these cages.

- ✓ Where indicated by pictograms, fall arrest harnesses must be worn and connected to the installed fall arrest device. Note that additional personal fall protection <u>can</u> be mandatory at locations with adjustable platforms or safety cages.

✓ Drivers (un)loading bulk products must have a personal fall arrest harness available. It must be certified and in proper condition. Drivers must be adequately trained regarding works at height and how to use the fall arrest harness.

✓ Airplane staircases can be used in the absence of fixed safety cages or personal protection. Installation only by INEOS personnel.

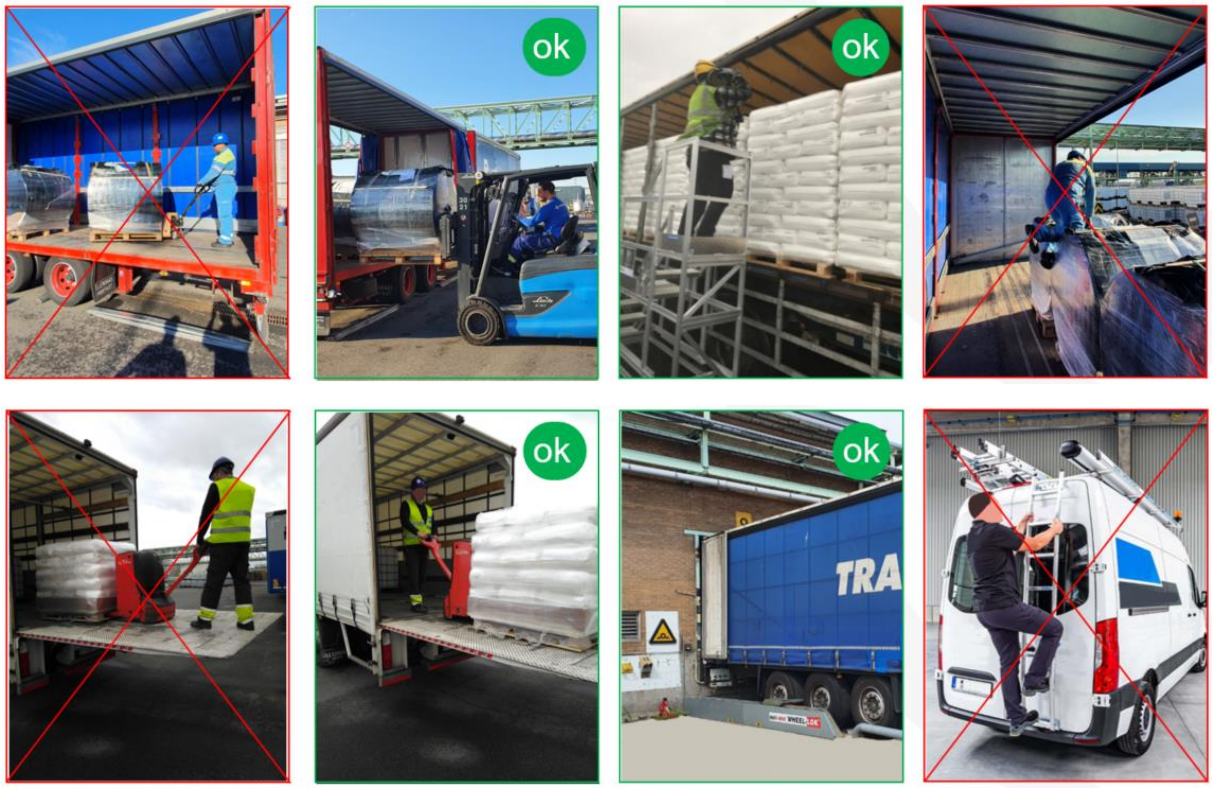
3.2.2. Working at height (packed goods)

🚫 Climbing onto the top of the cargo is strictly forbidden.

🚫 Accessing open load floors must be avoided. If unavoidable it must be limited, involve no climbing, involve no manipulation of the cargo, and with adequate access. (i.e ladder)

✓ A platform ladder must be used to handle curtain slider straps or shelves when out of reach.

✓ A pallet truck must be used to pull in or push out the goods when using tail lifts. Handling the goods with your backside to the open end of the tail lift is not safe.



3.2.3. Being under the influence of alcohol or drugs.

- ⃠ Having alcohol or drugs in possession or on board is strictly forbidden.
- ⃠ Being under the influence of alcohol or drugs is strictly forbidden.

3.2.4. Smoking outside the designated areas.

- ⃠ Smoking or vaping is generally prohibited. Permission to smoke or vape, where allowed, is restricted to designated positively marked locations.
- ⃠ Smoking and/or vaping in your vehicle is also prohibited whilst at site.

3.2.5. Entering confined spaces.

- ⃠ Entering a tank container or road tanker is strictly prohibited.
- ⃠ A driver is not allowed to put his head inside a manhole.

3.2.6. Entering the danger zone during lifting works.

- ⃠ Walking through the lifting zone of a crane is strictly forbidden.
- ⃠ Walking under any hoisting activity is strictly forbidden.

3.2.7. Working on installations without permission.

- ⃠ Opening, closing, energizing or altering INEOS equipment is strictly forbidden.
- ✓ Fully trained and certified ALS (Automatic self-Loading Station) drivers are allowed to manipulate equipment in line with instructions and training. See 4.8.3. for more details.

3.2.8. Bypassing of safeties or interlocks.

- ⃠ Disabling overpressure protections is strictly forbidden. (i.e. tank pressure relief valve)
- ⃠ Disabling overfill protections is strictly forbidden.

3.3. Breaches

Each LSR incident will require immediate investigation and action to avoid reoccurrence. Direct involvement of customer (in case of FCA collect), supplier (in case of delivery) and haulier senior management is required.

Confirmed LSR breaches will result in the driver being banned from the site(s) and application of contractual malus clauses.

Reoccurring LSR breaches or failure to implement a proper incident investigation can result in a haulier being banned from the site(s) and depot(s).

4. SAFETY, HEALTH AND ENVIRONMENTAL REQUIREMENTS

4.1. Driver training, certification and registration

Drivers entering INEOS Oxide sites must be adequately trained and skilled. They must be certified in line with legislative requirements and able to show their valid driving license.. They must adhere to industry and ECTA/CEFIC best practices. They must be familiar with the vehicle used and its equipment.

The information and instructions within this document must be known and understood by the driver.

Drivers shall follow the introduction on arrival at the site or depot. INEOS Oxide reserves the right to test the drivers knowledge and deny access if deemed insufficient.

Drivers for transportation of products classed as ADR must be ADR trained and licensed. The driver shall carry his ADR license at all times. The ADR license shall be valid and appropriate for the goods carried. Drivers for transportation of products classed non ADR shall preferable be ADR licensed.

At arrival the driver will be required to confirm his identity (= ID or passport), the INEOS Oxide or Third Party reference number, the name of the customer or supplier, the product(s) and quantity to be (un)loaded, the destination country and the equipment /vehicle details (license plates, container reference, compartment details, container volume, ...).

4.2. Driver language skills

Communication is essential to safe operations and emergency response. Drivers must therefore be able to understand and express themselves in English or one of the site local languages.

Zwijndrecht:	Dutch, French, German, English
Cologne:	German, English
Lavera:	French, English, Spanish, Italian
External depots:	English, local language(s)

The CEFIC Transperanto database defines the minimum competence level. (www. transperato.org) INEOS Oxide reserves the right to test driver knowledge and deny site access if deemed insufficient.

4.3. Personal protective equipment

The driver shall possess and wear the PPE's as listed hereunder. The haulier shall ensure that proper, certified and inspected PPE's are used. All PPE must adhere to European Regulation EU 2016/425.

- ✓ Safety helmet.
- ✓ Safety glasses with side protection.
- ✓ Safety shoes. Step-in rear ends are prohibited.
- ✓ Long sleeve and long trousers work clothes.
- ✓ Antistatic (ISO1149-5) fire retardant (ISO11612) work clothes.
- ✓ Fall arrest safety harness for bulk (un)loadings. (EN 361)
- ✓ Working gloves, neoprene gloves or nitrile gloves.
- ✓ Hearing protection.

Additional site or depot specific PPE requirements are listed under chapter 4.8.

Additional product specific PPE requirements (acid pack, face shield, respiratory protection, …) are required as listed in the extended safety data sheet (= eSDS). This information for all INEOS Oxide products is available via Publichem (https://apps.lisam.com/app) and must be shared with the driver.

The driver shall proactively double check the relevant PPE requirements at the (un)loading station and comply with them.

4.4. General safety requirements

The driver must respect the CEFIC guideline for safe (un)loading of road freight vehicles.

The driver must adhere to all safety instructions and site or depot specific (un)loading instructions.

The driver is not allowed to operate any equipment except with the approval and/or under supervision of the loading operator. Exception applies to specific emergency response equipment. (i.e. safety shower, eye wash, emergency buttons, …) The driver is only allowed to operate equipment on the vehicle (i.e manlids, valves, compressor and pump) after explicit approval of the operator.

Prior to the start of the operation, drivers shall check the location of the site safety equipment, e.g. fire extinguishers, eyewash, safety shower, first aid equipment, emergency escape routes, emergency alarm activation, emergency stop, decontamination equipment and absorbent materials.

The driver shall always ensure that proper weight distribution, maximum axle weights and maximum payloads are respected.

The driver shall always ensure that the transport tank and/or equipment is not under pressure before making or breaking any connections and communicate with the operator. Before leaving the site after (un)loading, the driver shall seek permission from the operator to depressurize the tank, unless otherwise required.

The driver shall ensure the equipment is properly earthed in case of flammable products.

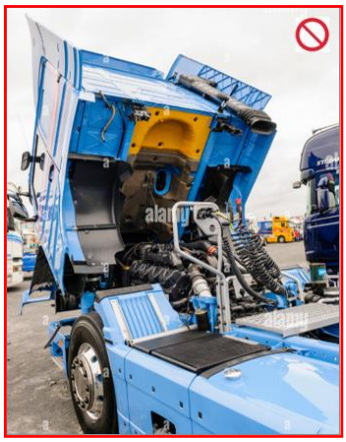
No manipulations on couplings (also not tightening) shall take place during (un)loading operations. For tightening leaking valves the operations shall be stopped first.

Safety belts must be used when driving the vehicle. Speed limits must be respected. For maneuvering, driver shall ask for assistance if needed. The driver shall always take the necessary precautions to prevent any movement of the vehicle during (un)loading. Railtraffic has priority at all times.

Container or tanker bottom valves must be closed before entering the site. This is requirement is independent of any double check by INEOS before loading. Purpose is to avoid major leaks at the loading stations. All valves, blanks and lids must be properly closed and sealed before leaving the site.

The driver must remain in or at the vehicle and/or the allocated area during (un)loading. When inside the vehicle, the driver must remain on active standby. He or she must be ready to leave the truck at all times while wearing the prescribed PPE's. It is forbidden to sleep, eat or use electronic devices.

All electronic devices (cellphone, tablet, smartwatch, fitness tracker, …) must be turned off and left inside the vehicle when at the (un)loading station of chemical products. Photography is prohibited throughout the entire site.



Vehicle repair works are not allowed unless specifically approved by INEOS Oxide staff.

All jewelry needs to be covered by PPE's. Long hair needs to be tied together.

Passengers, including children, relatives or pets are not allowed. Training instructors or co-drivers must formally register at the gate.

4.5. Load securing requirements for packed goods

The driver must check and insure the cargo is properly loaded and secured.

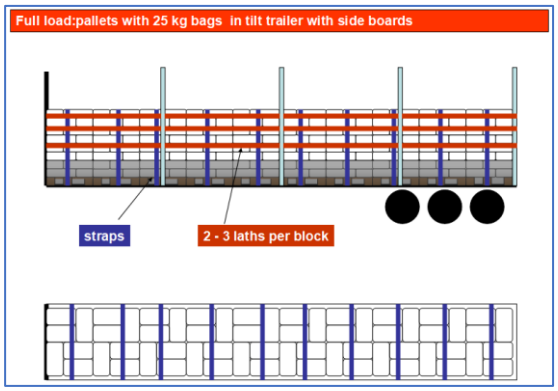
Lashing straps must be inspected prior to use. They may not be damaged. Straps may not be tied to each other if too short.

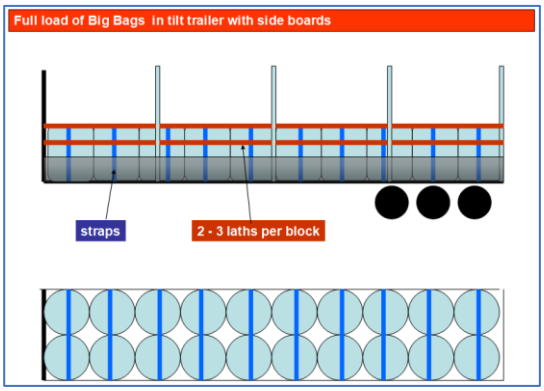
4.5.1. EN12642-L specific safety instructions:

These trailers must be used for single layer loading only. No double layer loading.

These trailers require at least one transversal strap per row of cargo for:

- ✓ palletized shrink wrapped bags
- ✓ palletized big bags
- ✓ palletized IBC's
- ✓ palletized shrink wrap drums
- ✓ palletized horizontal and vertical strapped drums





These trailers require at least two transversal straps per row of UNT14 portable tanks.

Friction mats must be used for palletized big bags and UNT14 portable tanks.

These trailers must have adequate side support by aluminum or wooden planks. (minimum 3 side boards, preferable 5 side boards) At least 2 side boards must cover cargo height.

Non fully (clearance > 8cm) loaded trailers require additional and specific securing.

4.5.2. EN12642-XL specific safety instructions:

Certificates for vehicles type EN 12642-XL must be available for checking.

These trailers must be used for single layer loading only. An exemption applies to palletized bigbags if conditions hereunder are respected:

- ✓ Friction mats are used
- ✓ Pallets or wooden plates are placed on top of the upper bigbag for distribution of strapping force.
- ✓ Top over lashing per row.

Fully loaded trailers, with cargo intrinsically interlocked by its shape, do not require additional strapping. This applies to palletized shrink wrapped bags, palletized big bags, palletized IBC's, palletized shrink wrap drums and palletized horizontal and vertical strapped drums with clearances smaller than 8cm.

Additional top over lashing is required in case of transversal clearances larger than 8 cm.

Additional friction mats for palletized big bags and UNT14 portable tanks are required in case of transversal side clearances larger than 8cm.

Additional shape based interlocking (minimum one aluminium plank up to upper cargo level) or spring lashing is required in case of longitudinal clearances > 8cm.

4.5.3. Box containers safety requirements:

Box containers can be used for double layer loading, except in case of sea transport

Fully loaded trailers, with cargo intrinsically interlocked by its shape, do not require additional strapping. This applies to palletized shrink wrapped bags, palletized big bags, palletized IBC's, palletized shrink wrap drums and palletized horizontal and vertical strapped drums with clearances smaller than 15 cm.

Additional complex lashing is required in case of transversal side clearances larger than 15 cm.

Additional shape based interlocking (minimum one aluminium plank up to upper cargo level) or complex lashing is required in case of longitudinal clearances > 15cm.

4.6. Equipment safety requirements

4.6.1. General

All vehicles presented for transport of products must be fit for purpose, in good condition, compatible with the cargo and meet all legal obligations. INEOS Oxide or the depot operator reserves the right to check and validate compliance before site entry, when at site and/or upfront departure.

All vehicles require presence of valid periodic technical (MOT) inspection certificates stating the maximum allowed load or combined weight. Documents must be in Latin alphabet. Cyrillic, Greek or Arabic documents will be refused.

All vehicles (incl. tractors and chassis) and vessels for the (un)loading of ADR products require presence of valid ADR certificates.

An adequate and documented maintenance and tyre management system must be in place. As minimum it must include a daily pre-departure check, a 2 monthly visual inspection and tyre pressure adjustment, a 6 monthly check of tyre profile depth and yearly MOT test. Remoulded, rethreaded or regrooved tyres are forbidden.

All vehicle components must be able to carry the requested quantity of products. Max axle weights must not be exceeded. The gross weight limits based on the countries of passage must be respected. A minimum loading tolerance of 300 kg must be taken into account.

Emergency equipment including fire extinguishers (sealed and validity not expired) must be available on the vehicle and be in good serviceable condition. The driver must be trained and competent in the use of emergency equipment such as fire extinguisher.

4.6.2. Liquid bulk

The ADR minimum and maximum degrees of filling must be respected. INEOS Oxide imposes these limits for both ADR and non ADR products. Tank containers or road tankers which are not equipped with baffle plates and with a capacity of more than 7500 litres shall be filled to no more than 20% or to no less than 80%. The maximum degree of filling will be according ADR regulations with an absolute maximum of 95%. Haulier equipment selection requires a 300kg margin to the limits above.

Tankers and tank containers shall be equipped with an integrated collapsible handrail. An exemption is allowed for deep-sea import or export. Temporary handrails which make use of container corner castings are not allowed as they are typically installed in uncontrolled conditions without fall protection.

All tankers and tank containers shall be equipped with a walkway covering the full equipment length. Full deck grating or walkways at both sides are strongly preferred. Sliding dome covers are not allowed.

ISO tank containers for (un)loading should be presented on a “walk in” type chassis. If not they must be positioned at the ultimate rear/back of the container chassis without introducing weight distribution risks. Purpose is to avoid slip & trip.

All vehicles for bulk product transport shall be equipped with 3 independent closures in series for bottom filling or discharge openings. This includes an internal valve (bottom / foot), an external valve and a final closing device.

All tankers and tank containers require clear labelling of compartments at the dome lids, filling sprouts and outlets. They require clear labelling of compartment volumes and of the earth ground connection.

All tankers and tank containers must be equipped with fixtures for attaching product labels and seals at the outlets and dome lids.

Vehicles are preferentially equipped with T-wrenches for the opening and closing of domes. Hammers, if used, must be none sparking.

Vehicles partly loaded with a none INEOS Oxide product will not be accepted for loading. In case of multiproduct loading, the haulier has to ensure no temperature sensitive products are transported together with ADR products or products of which the quality can be affected by the higher temperature products stowed in adjacent compartments.

All single product deliveries must be based on single compartment loadings. Single product deliveries will not be loaded into multiple compartments.

Double trailers are not allowed. Jumbo trucks are not allowed. Flex tanks or composite tanks are not allowed.

Vehicles presented for the transport of products must not require any pre-loading activities such as cleaning, sweeping or venting. Any necessary cleaning shall be done before entering the INEOS Oxide site. The suitability and cleanliness of the tank remains the final responsibility of the haulier.

4.6.3. Packed goods

Equipment used for loading of INEOS chemical packed goods must be either ISO box containers or trailers according to EN12642-L or EN12642-XL. Requirements:

- ✓ Equipment must be clean and odour-free. The surface of the load floor must be swept clean (no oil, grease or product), free from odor and free from frost/ice or snow.
- ✓ Floors must be suited for fork-lift truck (maximum total weight of 5740 kg) entering of the loading space cfr EN 283.
- ✓ Floors must be flat, free of objects (e.g. protruding nails), holes or other damage.
- ✓ Floor friction factor should be according the normative table B1 of EN 12195-1 as a minimum.
- ✓ Roofs, walls and tarpaulins/curtains must be free of holes and protect the cargo against normal weather conditions.
- ✓ Equipment must be sealable and easy to lock tightly from ground level.

- ✓ EN12642-L or EN12642-XL trailer lashing points must be in accordance with EN12640 and have a minimum strength of 2000daN. The number of lashing points should be no less than 12 pairs and allow appropriate cargo securing.

The design of securing methods (blocking, lashing and combinations) must be compliant to EN 12195-1: 2010. Lashing straps and ratchets must be in accordance with EN12195-2 for top-over lashing. (LC min 2500 daN, SHF min 50daN, STF min 375 daN) Straps must be labelled according to EN12195-2. Straps must be tested yearly and replaced after 5 years.

Double trailers are not accepted.

4.7. Haulier SQAS certification, subcontracting and registration

The requirements hereunder will have to be respected as of 01/09/2023.

4.7.1. Haulier SQAS certification

Hauliers entering INEOS Oxide chemical sites for the (un)loading of chemicals products must be SQAS certified. A valid and minimum rating of 80% is required.

Non certified SQAS hauliers, or SQAS certified hauliers with scores below 80%, can be subject of an exemption process. Cases, if any, must be limited. Exemptions require specific approval by the INEOS Oxide Business SHE department. Review can require up to one month. INEOS Oxide approval should be received before issuing any transport orders to the particular transport company.

Contact INEOS Oxide Business SHE: transport.safety.oxide@ineos.com

4.7.2. Haulier subcontracting

Transport subcontracting must remain limited to one level. It means the primary haulier -contracted by INEOS Oxide in case of delivered products ; contracted the customer in case of FCA collect ; contracted by the supplier in case of delivered raw materials- can subcontract to no more than one additional level. Subcontracting should furthermore be limited for the same purpose to no more than 5 hauliers. Purpose is to safeguard proper transfer and receipt of SHE instructions by limiting the number of interfaces. Any exemptions require approval by the INEOS Oxide Business SHE department.

INEOS must be informed on (sub)contracted haulier credentials upfront entry to the INEOS Oxide chemical sites (Zwijndrecht, Lavera, Cologne). Providing the required information is part of the contractual instructions for INEOS contracted transports. Providing the required information, and confirming compliance with this INEOS Oxide haulier SHE policy, is part of the slot booking process for FCA and raw material transports.

Entering the Lavera site requires compliance with a site and product specific safety protocol. See 4.8.2.

4.8. Site or depot specific requirements

4.8.1. INEOS Oxide Cologne

- ✓ None

4.8.2. INEOS Oxide Lavera incl. Alkox

- ✓ Additional product specific safety protocols, including detailed instructions, must be respected. The hauliers have to inform and instruct drivers appropriately. The drivers must proof receipt and confirm compliance at the gate. More details are available in the protocols.
- ✓ The multi-norm work clothes must be of the one part jumpsuit type. Separate vests and pants are not allowed.
- ✓ Safety helmets must be equipped with chin straps for all drivers working at height and/or nearby opened manlids. They must be used under these circumstances.
- ✓ An escape respiratory device must be carried throughout the full visit. The safety device will be handed to the driver upon arrival at the gate.
- ✓ Drivers accessing the site for loading or unloading at the Alkox unit must be ADR certified, even if they come to (un)load non ADR products.
- ✓ A velcro prohibition sign must be attached to the ladder of the container or tanker before loading. It will be provided at the Oxide gatehouse and must attached by the driver whilst at the parking. It must be kept on the truck until the driver return to the Oxide gatehouse for exit documents. This requirement is not applicable to the Alkox unit.

4.8.3. INEOS Oxide Zwijndrecht

- ✓ Trained and certified ALS (Automatic self-Loading System) are allowed to operate INEOS equipment in line with their training and instructions. This includes operation of safety cages and loading arms.
- ✓ A bungee ball prohibition sign must be attached to the ladder of the container or tanker before entering the site. Temporary removal of the sign and climbing the ladder is only allowed at locations with and whilst using a fall arrest device.

4.8.4. External depots

No specific or additional requirements

5. INCIDENT HANDLING

5.1. General

All SHE incidents taking place on site or during transport must be reported and adequately investigated. Life saving rule breaches will require immediate involvement of customer (in case of FCA collect), supplier (in case of delivery) and haulier senior management.

5.2. Failure to comply

Failure to adhere to the general industry safety standards, this policy, the adjacent site protocols or the site loading procedures can result in hauliers, drivers and/or vehicles being refused access.

Repetitive breaches, serious incidents or failure to conduct adequate and timely incident investigations can result in hauliers and/or drives being banned from entering the site(s) or depot(s).

INEOS Oxide is not responsible for any demurrage costs or losses due to failure to comply.

5.3. FCA

The customer shall be responsible for handling any emergencies associated with transportation of the goods. They shall have the capability to provide a Level 3 response for the goods being transported. The vehicle shall display their emergency response number. The haulier or customer shall have a nominated Dangerous Goods Safety Adviser.

6. DOCUMENT CONTROL

Owner: INEOS Oxide, business SHE department

Last update: 2024-11-12

Modifications:

- First edition by Jeroen Wesenbeek on 2023-04-13
- Adding information in 4.1 and 4.6.1
- Change of handrail type in 4.6.2. Applicable from 1 August 2024
- Adding norms PPE (Nov 2024)