

Policy for the handling of FCA orders

Issue 11

June 2021

1.0 INTRODUCTION

The purpose of this document is to detail INEOS Olefins & Polymers Europe requirements related to a collected order and make sure customer reads, understands and applies it. The customer will have full responsibility in training its hauliers and ensuring full compliance to those requirements.

These key requirements are related to:

- HSE (Health, Safety and Environment) in order to protect both your drivers and our people against any harm, injury or accident.
- Operations: loading operations, type of equipment
- VAT treatment of collected orders

INEOS Olefins & Polymers Europe reserves the right to refuse to load any vehicle which in INEOS Olefins & Polymers Europe's sole opinion does not comply with any of these clauses below.

2.0 SAFETY & OPERATIONAL ASPECTS

1. **It is strongly recommended to use SQAS assessed hauliers as they are subject to a three yearly safety assessment.**
2. **We expect hauliers mentioned on the yearly updated list to pick up goods at our sites. We forbid any subcontracting to other hauliers not mentioned on this list.**
3. The vehicle must comply with all relevant standards of construction, testing, use and inspection, and be duly certified for the carriage of the products involved as required by regulations. The vehicle/trailer must be in good condition, and fully compliant with all relevant motor vehicle legislation. In any case the condition of transport equipment remains the responsibility of the haulier.
4. The vehicle/tank/silo/container/trailer must be suitable for the whole of the ordered quantity, and must be fit for the journey to be undertaken. The general condition of the vehicle must be acceptable: tyres must be in good condition, twist locks must be securable and in serviceable condition. The truck must be able to load the requested quantity taking into account the maximum legal permitted gross weight and the maximum legal axle weights in countries of passage. All applicable regulations along the route and in the country of destination must be known and met by the driver.
5. **There must be a valve installed to release the pressure from the silo. It is mandatory that this valve can be operated from ground level. When flexible hoses are attached those must be detachable to allow inspection. Depressurizing the silo must be possible from ground level or by a vent valve operated at ground level (preferred option) or through the ground level manifold system or by bringing the outlet of the vent valve on top of the silo with a flexible hose to ground level (in this case the vent valve on top has to remain open). In any case we don't want the driver to go on top of the SILO to open the vent valve.**
6. "Silo trucks/containers need to be clean and dry before presentation of the truck. Cleaning needs to be done in accordance with

CEFIC/ECTA Best practice guidelines for the cleaning of dry bulk polymer transport tanks
<https://www.ineos.com/businesses/ineos-olefins-polymers-europe/logisticsmatters/polyolefins/customer-focus/cefic-ecta-guidelines-on-safe-loading-and-unloading-of-road-freight-vehicles2/>

and

CEFIC/ ECTA guidelines on cleaning and inspection of rotary valves and associated equipment. (Bag in Box containers)
<https://www.ineos.com/businesses/ineos-olefins-polymers-europe/logisticsmatters/polyolefins/customer-focus/cefic-ecta-guidelines-on-cleaning-and-inspection-of-rotary-valves-and-associated-equipments-bag-in-box-containers/>

and will be inspected before loading. This is completed by the loading terminal prior to loading. This inspection is final. **The time for cleanliness inspection is considered to be part of the total loading time.**

A valid EFTCO European Cleaning Document (ECD) (see www.eftco.org) which identifies each of the EFTCO codes required according the "Polymer Industry cleaning specification" is mandatory. The cleaning document must also bear the following statement "Tank and ancillaries cleaned to the "Polymer industry cleaning specification". The truck will not be accepted for loading if the driver does not present this valid cleaning (ECD/EFTCO) document.

The loading of the vehicle by INEOS Olefins & Polymers Europe will not constitute an acknowledgement of acceptance that it is clean, and INEOS Olefins & Polymers Europe does not accept any responsibility on this matter. The cleanliness of the silo trucks/containers remains the responsibility of the collector.

4. Vehicles already partly loaded with another, non-INEOS Olefins & Polymers Europe product, will not be accepted for loading. The truck should not carry empty pallets on board.
5. Each crew member of a vehicle shall carry with them a means of identification which includes their photograph.
6. A unique reference number will be provided by INEOS Olefins & Polymers Europe for each shipment. This number; called delivery note number (or collection number for Koln site) is constituted of 8 digits and is the loading reference. It will be necessary to mention it when doing pre booking and when arriving at the loading point.
7. At the loading point, the driver must present a collection note which specifies the customer's name, the name of the physical country of destination, INEOS Olefins & Polymers Europe delivery note number, the name and quantity of the product(s) which the driver is authorized to collect, the registration-, trailer or fleet number of the collecting vehicle, and the full hauliers name and address.
8. Loading dates and timing: It is extremely important that loading dates and times agreed are respected. We emphasize also that most of the sites are applying a "booking in" policy where a collection time-slot has to be pre booked in advance. The site must be contacted the day before loading in order to book a time-slot (See Section 4). Vehicles not respecting loading date and time may not be permitted access at the plant. INEOS Olefins & Polymers Europe will be entitled to cross charge to the customer any extra cost generated by the non-respect of loading dates and times, as well as changes of the loading date , specifically the ones being done at short notice.
9. It is **required** that drivers are able to express themselves clearly in either
 - one of the local languages of the loading area, or
 - in English.**Drivers will be rejected if they do not understand the site safety rules and cannot communicate properly with the site personnel.**
10. Emergency equipment including fire extinguishers (sealed and validity not expired) and protective clothing must be available on the vehicle and be in good serviceable condition. The driver must be trained and competent in the use of the fire extinguisher provided.
11. The driver must, as a minimum, wear a safety helmet (to EN 397), safety glasses (EN166F), gloves, safety footwear (EN 345), a Hi-vis jacket and an overall (one or two pieces). At the Köln and Lavera sites, the overall must have Antistatic and Flame retardant properties (EN 1149/ EN 531). The hauliers need to provide their drivers with this PPE. Drivers who are not suitably equipped will not be authorized to load.
12. The driver and his vehicle must comply with all site rules and safety regulations in force. He will be informed of these rules and regulations at the entry of the site. INEOS Olefins & Polymers Europe reserves the right to carry out spot checks on the driver and his vehicle prior to, during and after loading.
13. The driver is not allowed to operate any equipment on site except with the approval and under supervision of the loading operator. The driver must attend the loading operations and provide assistance if required by the loading crew.

14. Loading of packed goods: type of equipment and load securing

14.1 Type of vehicles

The following types of vehicles are **NOT** accepted for loading:

- * Tilt trailers which require the tarpaulin to be put on the roof for loading/ unloading.
- * Trucks with rear loading only, swan necks, closed or frigo-trucks.

14.2 Vehicle requirements

General requirements

The trailer floor must be flat and free of objects (e.g. protruding nails) and holes or other damage that might either cause risk to loading/ unloading staff or damage the cargo.

The roof, walls and tarpaulin/ curtain must be free of holes and protect the cargo against normal weather conditions.

Although at INEOS O&P sites trailers are loaded from the sides, the trailer floors must be capable of supporting forklift trucks (with max total weight of 5740 kg)

Process and rules must be in place to ensure that loads are secure and do not exceed the manufacturer's specifications and legal limits for the vehicle.

A sufficient number of lashing points (minimum 12 pairs), designed for a minimum force of 2000 daN must be fitted in order to allow load securing.

A sufficient number of lashing straps and ratchets in accordance with standard EN 12195-2 / 2010 with specification: LC min 2500 daN, SHF min 50 daN, STF min 450 daN. The straps must be labelled in accordance with EN 12195-2. For required number of straps: see below.

Tilt trailers and trailers with removable stanchion poles

Tilt trailers (trailers with tarpaulins which need to be put on the roof for loading/ unloading) are **not accepted**.



Trailers with removable stanchion poles are **not accepted**.



Curtain sider or tautliner (trailers without side boards and with tarpaulins which slide along the roof structure like a curtain)

Curtain siders must be equipped with horizontal wooden or aluminium side planks (at least 4 planks per section between the stanchions).

Curtain siders constructed according to standard EN 123642-XL are preferred.

This type of trailers is not accepted as it does not allow side loading of the first row of pallets.



14.3 Load securing requirements

For palletized bags:

LC \geq 2500daN

Loading configuration

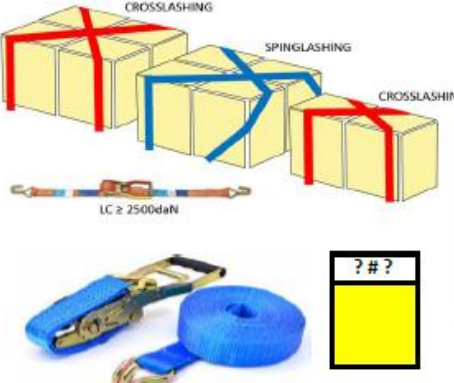
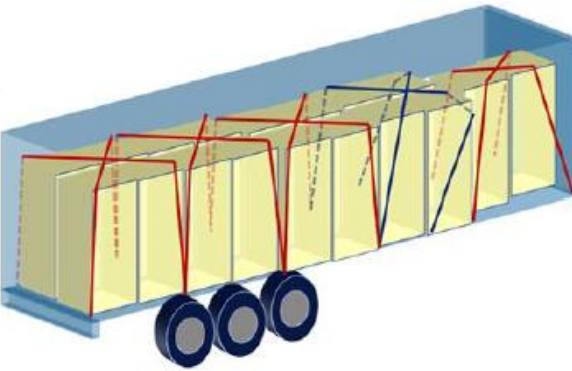
22 pallets	20 pallets	20 pallets	18 pallets	17 pallets	16 pallets	15 pallets	14 pallets


Instruction based on cargo securement verification protocol for non-rigid packages for chemical products and inclination tests of different stock keeping units. Protocol and test certificates are available on request.

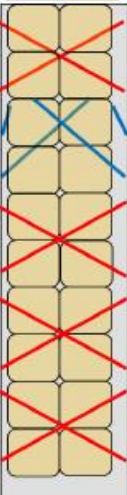

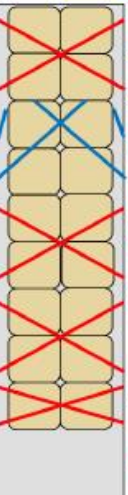
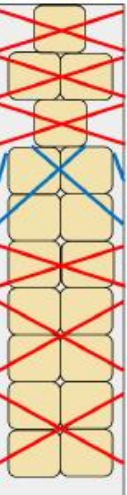
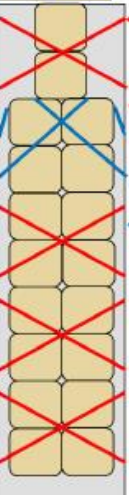
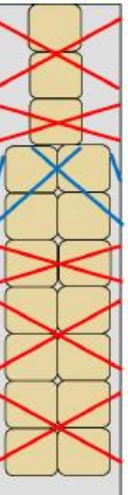
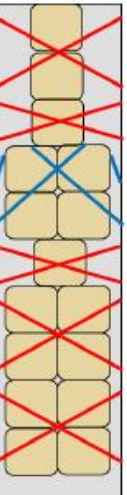

* Diese Angaben sind entsprechend dem Untersuchungsprotokoll für Ladesicherung von nicht-starrten Verpackungsgebünden für chemische Produkte und durchgeführten Kippversuchen von verschiedenen Gebindeeinheiten. Untersuchungsprotokoll und Versuchszertifikate sind auf Anfrage verfügbar.*

LOAD SECURING INSTRUCTION			Shipment nr. :
Based on EN12195-1	Rev. Nr. 3	Rev. date 04-04-2010	Signature truck driver Date
			acceptance and understanding instruction / /

Date:	Shipment nr:	Name and signature driver:

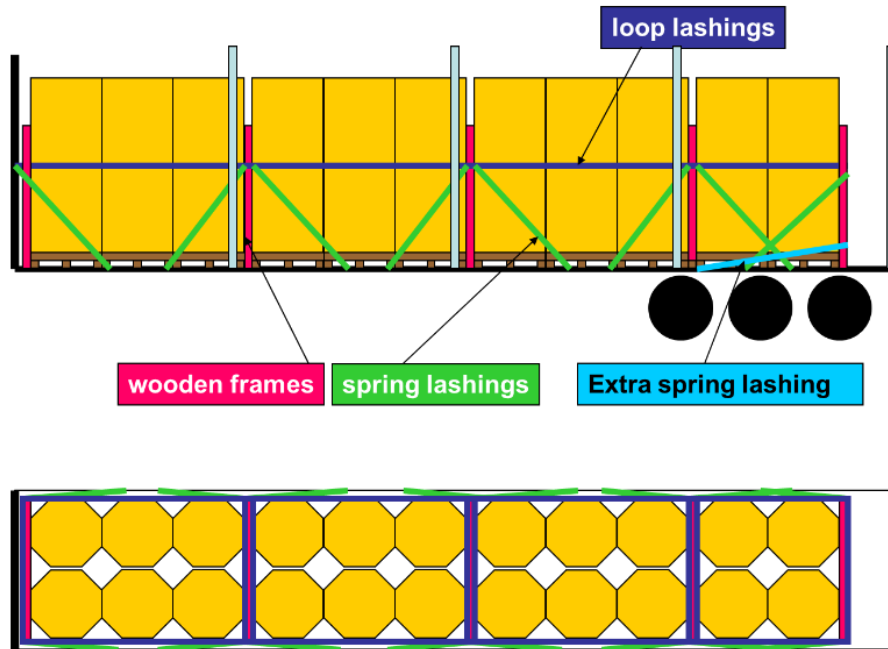

= 1 Pallet 1375 kg 1,3m x 1,1m x 2 m

20	19	18	18	18	17	16
						
 <div style="display: inline-block; border: 1px solid black; padding: 2px 10px;"># 10</div>	<div style="display: inline-block; border: 1px solid black; padding: 2px 10px;"># 12</div>	<div style="display: inline-block; border: 1px solid black; padding: 2px 10px;"># 10</div>	<div style="display: inline-block; border: 1px solid black; padding: 2px 10px;"># 14</div>	<div style="display: inline-block; border: 1px solid black; padding: 2px 10px;"># 10</div>	<div style="display: inline-block; border: 1px solid black; padding: 2px 10px;"># 12</div>	<div style="display: inline-block; border: 1px solid black; padding: 2px 10px;"># 12</div>

For Octabins:


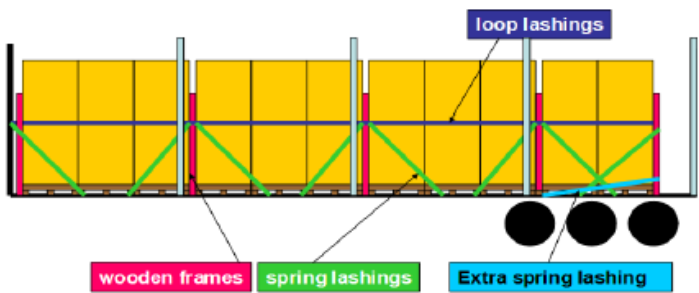
*Octabins are secured according to special load securing plans and by using wooden frames and straps. Example:

Full load: Octabins in curtain siders without side boards



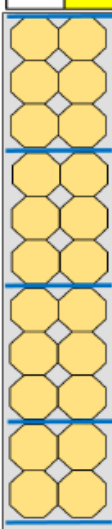
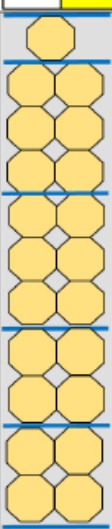

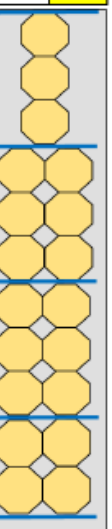
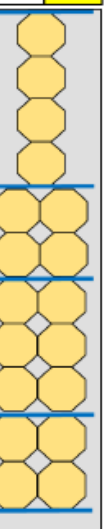
* Number of straps that can be required: **14 straps**,


Date:	Shipment nr:	Name and signature driver:

? # ?

= 1 Octabin 1100 kg 1,3m x 1,1m x 2 m

22	21	20	19	18	
					
# 14	# 14	# 14	# 14	# 14	#



It is the driver's responsibility to strap and secure the load in the transport vehicle.

According to French regulations, it is the loader who is responsible for the load securing, except when other arrangements have been contractually agreed. Therefore, French customers are requested to include in the contracts with their hauliers that the driver is responsible for load securing.

For Octabins, the driver will be assisted by an operator in order to place the frames and straps according to the load securing plans.

3.0 Penalties in case of non-compliance of FCA drivers (customer collect) with the site safety requirements

The 3 INEOS O&P regions have agreed on a standard list of penalties to be paid by FCA customers in case drivers are not complying with the site safety requirements. The table below now also includes the 7 INEOS Life Saving Rules and the penalty in these rules are breached.

Non Conformances by FCA hauliers while on INEOS O&P sites, leading to a penalty	PENALTY
<u>General safety:</u>	
• Seat belt not worn	200€ fine
• Working at height without appropriate use of safety facilities and which is not a breach of a life saving rule	200€ fine + driver banned from site
• Speeding	200€ fine
• Use of mobile phone while driving	200€ fine
• Aggressive behaviour	200€ fine + driver banned from site (depending on the degree of aggression)
• Non compliance with legislation e.g. technical truck inspection	200€ fine
• Non compliance with INEOS site or contractual requirements (covers both equipment and processes e.g. use of savoyarde trucks, dumping of old liners on site)	200€ fine
• Non compliance with PPE requirements either none availability or refusal to wear, and which is not a breach of a life saving rule (e.g. not wearing a fall arrest harness)	200€ fine + driver banned from site if refusing to wear PPE. Drivers who have inadequate PPE will be refused access to site
• One or more Twist Locks missing or not working	200€ fine
• Tyres in poor condition	200€ fine
• No Earthing Cable or non-use of earthing cable (at site where required)	200€ fine
• Insufficient Safety Strappings on board for load securing	200€ fine
• Truck design or equipment results in loading/unloading problems e.g. truck with removable station poles, broken safety ladder	200€ fine
• Failure of driver to comply with forklift truck segregation rules	200€ fine + driver banned from site
• Load securing not in compliance with INEOS rules	200€ fine

Breach of Life Saving rules by FCA hauliers while on INEOS O&P sites, leading to a penalty

PENALTY

- **Consumption or being under the influence of alcohol or drugs on company property**

- using drugs or alcohol on site or being under influence of alcohol or drugs when on site (national limit exceeded)
- In case of suspicion of alcohol abuse noticed by INEOS staff and/or INEOS authorized persons the driver can be asked voluntarily to take an alcohol test in line with site rules.
- If driver refuses this test the site will contact the local police department to perform an official test to establish the alcohol content.
- The same rules apply for being under the influence of drugs (e.g. cannabis, mdma, xtc, etc..)
- Symptoms of abuse can be e.g. alcohol smell in breath, not being able to walk a straight line ; speak gibberish

- **Smoking outside dedicated smoking areas**

- smoking outside designated smoking areas
- The principle idea of prohibiting smoking on the INEOS sites is to prevent risk of fire and/or explosion.
- Smoking is defined when the driver actually smokes a cigarette or an E-cigarette outside the designated smoking areas (even in his cabin).

- **Commence work on live equipment/machines without authorisation**

- repairing a running truck engine/ compressor etc.. on site; tipping a silo truck on the parking area, WITHOUT authorisation of the site.

- **Disabling or overriding safety critical devices/interlocks without authorisation**

- Disabling safety devices like switches, interlocks etc. E.g. overriding the dead man system of the operating mechanism to raise the silo (by blocking the switch) / disabling the interlock of the safety grid on the rotary valve etc...

- **Not using proper fall protection when working at height**

- Going on top of (bulk) trucks and/or container without using the required protective equipment (e.g. standing on a bulk truck without using the life line system)
- Going on top of (bulk) trucks and/or container without using the equipment in the right way
- Climbing on top of a pallet or pallets placed on the truck (e.g. to put the straps in place).
- Climbing on top of the roof of a taut liner.
- Note: not using the mobile stepladder to step onto the load floor of a curtain sider or other packed goods vehicle is NOT considered to be a breach of a LSR

- **Entry to confined space without authorisation and gas test**

1. Driver shall be immediately removed from the Site .The individual shall then not be allowed for life to return to any other INEOS O&P site .
2. For any new case of Life Saving Rule breach the haulier will be banned to pick-up goods at our site.
3. Additionally, the customer shall pay per infringement of INEOS Life Saving Rules a fine of 350 €.
4. Point 3) will be repeated for any new case of Life Saving Rule breach.
5. In case of severe re-occurrence of breaches of Life Saving Rules INEOS reserves the right to forbid FCA pickups.

<ul style="list-style-type: none"> ○ Entry into a silo truck without authorisation of the site and without confined space entry permit, or without following the requirements as mentioned in the permit (e.g. oxygen test) Even at the parking area of the site or at the entrance gate (e.g. to dry out a wet silo truck after cleaning). 	
<ul style="list-style-type: none"> ● Lifting & hoisting – no unauthorised person to enter the defined danger zone where objects can fall <ul style="list-style-type: none"> ○ Entering a defined danger area where objects can fall (e.g. under a crane in operation) and which is well marked and easily observable by any person 	

4.0 VAT TREATMENT FOR FCA ORDERS

As a matter of policy, orders collected by customers (FCA) will be treated as domestic sales in the country of collection and VAT will be charged, even if the customer declares a destination in another EU country and irrespective whether the customer has a VAT registration number in the country of collection. If the customer chooses to collect material under these guidelines without being registered in the country of departure, INEOS Olefins & Polymers Europe cannot be held responsible for any difficulties associated with any VAT-reclaim.

5.0 ADDITIONAL INFORMATION

More specific up-to-date information on site operations (addresses, contacts, slot-booking procedures, etc.), load securing etc....is given in the document "INEOS Olefins & Polymers Europe Site Specific Requirements", the latest version of which can be found here:

<https://www.ineos.com/businesses/ineos-olefins-polymers-europe/logisticsmatters/polyolefins/fca/ineos-op-requirements-for-fca-orders/>