

### EMEA\* Safety, Health, Environment (SHE) requirements for transport and haulier related activities (loading/unloading)

#### Scope:

Creating a safe work environment is essential to ensure the well-being and health of our employees and contractors. By implementing safety measures and protocols, we can minimize the risk of accidents and injuries in the workplace.

This document describes general safety requirements for onsite activities, including, but not limited to, loading and unloading, at INEOS Styrolution sites, aside or on top of site requirements that might apply separately.

This document will be an integral part of all purchase orders for applicable services in the EMEA\* region.

#### Content:

It contains the following content:

- 1 Life saving rules (“**LSR**”)
  - 1.1 List of LSRs
  - 1.2 Practical implementation of LSRs
  - 1.3 Breaches
- 2 INEOS 10 Behavioral Safety Principles
- 3 Personal protective equipment
- 4 General safety requirements
- 5 Operation clean sweep (“**OCS**”)

Annex 1: Abbreviations

#### **Main revision details**

**Revision 1**, March 4, 2025

Rev. nr.	Details of Change	Document Owner	Date
1	Initial web page version: EMEA* SHE – Safety Health Environment - requirements for transport and haulier related activities (loading/unloading)	INEOS Styrolution EMEA SHE department	04.03.2025

\* **EMEA**: Europe-Middle east-Afrika region, in practice this concerns our sites in Antwerp, Cologne, Ludwigshafen, Wingles and Schwarzheide.

## 1. INEOS LIFE SAVING RULES (LSR)

INEOS Group Life Saving Rules are in place to avoid fatalities or life-changing events. Breaking of a Life Saving Rule will be investigated, and follow the relevant disciplinary procedures up to and including dismissal.

### 1.1 List of LSRs

INEOS applies 7 Life Saving Rules with a zero tolerance philosophy. The purpose of these rules is to avoid serious incidents and potential loss of life.

The 7 Life Saving Rules are:

- ⊘ 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.

### 1.2 Practical implementation of LSRs and best practices shown in the following that shall be used off at every time

- ⊘ is subject of a LSR breach
- ✓ is a best practice

#### 1.2.1 Working at height without suitable fall protection (bulk)

- ⊘ Accessing or climbing onto the topside of a road tanker or tank container without fall protection 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) or 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 can be mandatory at locations with adjustable platforms or safety cages.



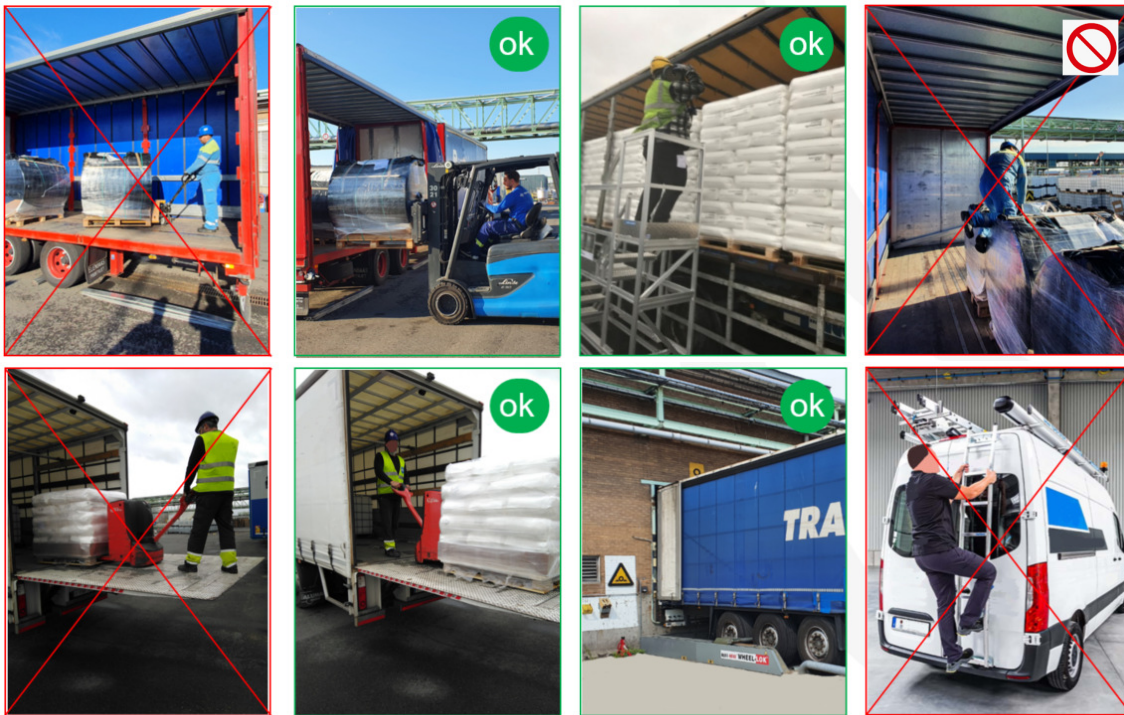
- ✓ Drivers (un)loading bulk products must have a personal fall arrest harness available. It must be certified and in proper condition. Drivers must be adequately trained regarding works at height and how to use the fall arrest harness.



### 1.2.2 Working at height (packed goods)

- ⊘ Climbing onto the top of the cargo is strictly forbidden.
- ✓ 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.

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)



### 1.2.3 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.



#### 1.2.4 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.



#### 1.2.5 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.



#### 1.2.6 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.



#### 1.2.7 Working on installations without permission

- ⊘ Opening, closing, energizing or altering INEOS equipment is strictly forbidden.

#### 1.2.8 Bypassing of safeties or interlocks

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

### 1.3 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 hauler 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 hauler being banned from the site(s) and depot(s).

## 2. INEOS 10 BEHAVIOURAL SAFETY PRINCIPLES

As INEOS Styrolution we commit to and promote actively the following BEHAVIOURAL SAFETY PRINCIPLES:

1. We believe all incidents and injuries can be prevented
2. Everyone's first responsibility is to ensure they work safely
3. Everyone has the duty to stop work if they feel the situation is unsafe
4. The expectations and standards are the same for everyone on the site
5. Rules and procedures must be observed and respected
6. We should look out for each other's safety and unsafe situations
7. All injuries and incidents /near misses must be reported and investigated
8. Risk assessment must be carried out prior to, during and on completion of work
9. All team leaders have a special responsibility for promoting and upholding these principles
10. We must always work within the limit of our competency and training

## 3. REQUIRED PERSONAL PROTECTIVE EQUIPMENT (PPE) TO ENTER INEOS STYROLUTION SITES

The driver must possess and wear the PPE's as listed hereunder. The hauler must ensure that proper, certified and inspected PPE's are used.

- ✓ Safety helmet.
- ✓ Safety glasses with side protection.
- Safety shoes. Step-in rear ends are prohibited.
- ✓ Long sleeve and long trousers work clothes.
- ✓ Body covering clothes. (No short sleeves or shorts)
- ✓ Fall arrest safety harness for bulk (un)loadings. (when working at height)
- ✓ Working gloves.
- ✓ High visibility vest



## 4. GENERAL SAFETY, HEALTH AND ENVIRONMENTAL REQUIREMENTS

- Drivers entering INEOS Styrolution sites must be adequately trained and skilled. They must be certified in line with legislative requirements. 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. The driver must adhere to all safety instructions and site or depot specific (un)loading instructions. See also the site Safety & Operations protocols.
- The driver is not allowed to operate any equipment except with the approval and/or under supervision of the (un)loading operator (e.g. at bulk self loading terminals). 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. manlifts, 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, first aid equipment, emergency escape routes, emergency alarm activation, emergency stop. The emergency procedures are described in the site Safety&Operations Protocols (part of the tender documents for carriers).
- The driver shall always ensure that proper weight distribution, maximum axle weights and maximum payloads are respected.
- The driver shall ensure the equipment is properly earthed in case of (un)loading of bulk products.
- 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.
- Rail traffic has priority at all times.
- Special attention is needed to possible interference with pedestrians and or cyclists on site.
- A prohibition sign must be attached to the ladder of the bulk container or truck before (un)loading.
- Photography is prohibited throughout the entire site.
- Vehicle repair works are not allowed unless specifically approved by INEOS Styrolution staff.
- Passengers, including children, relatives or pets are not allowed. Training instructors or co-drivers must formally register at the gate.
- If the driver does not follow the site instructions, the (un)loading personnel has to right to immediately stop the operation and if needed, expel the driver from the (un)loading area.





## 5. OPERATION CLEAN SWEEP (OCS)

The truck drivers have the responsibility at the loading place, during transit and at the customer's premises to avoid spillage of pellets. All spills must be reported and cleaned up. Drivers must have cleaning material on board (broom / sweeper, can, empty bag etc.) and dispose spillages at adequate area. The loading personnel will indicate where to dispose the spilled pellets. Spilled quantity can be charged to the causer.



Spilled pellets on the top roof of the bulk container or silo truck during loading must never be swept into the truck again! When this is noticed, INSTY is forced to downgrade the content of the truck or container to non-prime product and all costs related to this action (such as loss of value of product) shall be borne by the carrier.

For bulk (un)loading, a truck blowing station is mandatory to use, if available at the (un)loading place.



It is absolutely prohibited to carry loose pellets outside the loading place and/or to dump spilled material. If spills are noticed during transit, the drivers shall prevent any spillage on the road/into nature (e.g. repair of leaking bag with adhesive tape).

Waste cannot be dumped on site or anywhere else. Where waste bins are available, rules of separation of garbage need to be respected.

If spills occur at the unloading place, the site staff needs to be informed and the driver needs to follow the site instructions.

The Carrier shall preferably be Safety & Quality Assessment for Sustainability (SQAS) certified, including OCS requirements. OCS instructions have to be available in the driver's manual. The hauliers should include an OCS section in the regular trainings for the drivers. Focus should be on spills prevention. The more you prevent spills from happening, the less would be the time spent on cleaning.

More info about OCS: <https://www.opcleansweep.eu>

## **ANNEX 1: Abbreviations**

**EMEA:** Europe-Middle east-Afrika region, in practice this concerns our sites in Antwerp, Cologne, Ludwigshafen, Wingles and Schwarzheide.

**INSTY:** INEOS Styrolution

**LSR:** Life Saving Rule

**LSR:** Breach: violating an LSR

**OCS:** Operation Clean Sweep. More info: <https://www.opcleansweep.eu>

**PPE:** Personal Protective Equipment

**SHE:** Safety, Health, Environment

**SQAS:** Safety & Quality Assessment for Sustainability, An assessment scheme for chemical companies to evaluate the safety, environmental, security and quality performance of logistics service providers and distributors. More info: <https://SQAS.org>