

INEOS Olefins & Polymers Europe



CODE OF PRACTICE FOR THE SAFE DISTRIBUTION OF POLYOLEFINS IN PACKED FORM

V7 June 2022

FOREWORD

Everyone involved in operations for Ineos must work in accordance with the Ineos Group 10 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 others 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

INEOS have also identified **seven Life Saving Rules** that are vital for the protection of our staff, our contractors and logistics service providers.

The Seven INEOS Life Saving Rules are:

1. No consumption or being under the influence of alcohol or drugs on company property.
2. No smoking outside dedicated smoking areas.
3. No work on live equipment/machines to commence without authorization.
4. Safety critical devices/interlocks must not be disabled or overridden without authorization.
5. Persons working at height must use proper fall protection.
6. No entry to confined space without authorization and gas test.
7. Lifting & hoisting; no unauthorized person to enter the defined danger zone where objects can fall.

INEOS have introduced terms into our contracts that provide the rights to impose sanctions in the event any of the life saving rules are broken. These sanctions can constitute fines and a life ban of the driver from the Ineos sites.

It is Ineos Olefins & Polymers Europe (O&P) policy that safety of operation must be paramount.

The implementation of this policy in the distribution field poses special problems because of the extent to which we are dependent on third parties and the difficulty of supervising distribution operations in the field.

We must nevertheless be quite satisfied that our distribution operations are carried out competently and safely, and in accordance with national legislation in force.

This Company '*Code of Practice for the safe distribution of polyolefins in PACKED form*' has been prepared to help fulfil this aim. The Code should therefore be followed by those Departments of the Company concerned with distribution activities in Europe.

This Code of Practice is published on the INEOS O&P Logistics SHE Alfresco site

It is also available to our Logistics Services Suppliers on the logisticsmatters extranet website:

<http://www.logisticsmatters.info/Lists/European%20Logistics%20Codes%20Of%20Practice/AllItems.aspx>

This document is not published as a paper document. Therefore any paper documents must be treated as uncontrolled copies. Reference to the website above will always provide the most up-to-date copy. Changes to this document will of course be advised to a wide group of business and site based personnel.

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Distribution List

Copy No :

Issue To :

One master copy kept by the Olefins & Polymers Europe Logistics HSE manager

Main Revision Details

<u>Rev No :</u>	<u>Details of Change</u>	<u>Date</u>
3	New emergency telephone number, new Load securing requirements	Feb 11
4	Minor changes to driver training requirements, SQAS action plan, ban of tilt trailers.	Oct 11
5	Added Ineos Life saving rules, Site safety leaflet (Appendix 1) Added chapter on partial loads Minor changes in section 3 (PPE), 9 (load securing), 11 (vehicle checks)	July 2016
6	Adding the Ineos 7 Life Saving Rules Minor changes in section 9 on load securing	June 2019
7	Safety shoes alignment with the new standard EN ISO20345-S2	June 2022

SECTION 1 SCOPE

Scope

This Code applies to

- a) The storage and handling of packed goods at Intermediate storage facilities
- b) Transport by road or intermodal routes of packed goods within Europe
- c) Loading and unloading activities

Of polyethylene and polypropylene

More detailed information on below mentioned subjects can be found on:

www.logisticsmatters.info (no password needed, click 'cancel' if prompted for password)

- Code of Practice for Load Securing
- Code of Practice for the safe use of Forklifts
- Ineos Olefins & Polymers Europe Site specific requirements

This Code is based upon the best-recommended practices within the industry at the present time. Ineos will keep abreast of industry developments, which may result in particular aspects of this Code being amended from time to time.

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SECTION 2
DRIVING SAFETY STANDARD



The following comprises a basic set of safety requirements which must be met for all INEOS Olefins & Polymers Europe logistics activities including specs of vehicles (not including forklifts) and driver requirements, except when mentioned '**recommended**' in which case this topic is considered to be good practice but it is not a requirement. In any instance where the following requirements conflict in any way with legal requirements in the country of registration of the vehicle, the latter shall be complied with and take precedence.

1: General vehicle Requirements

1.1	Design
1.1.1	Vehicles and equipment shall be fit-for-purpose conforming to recognized specifications.
1.2	Maintenance
1.2.1	All vehicles, and the equipment fitted to them shall be included in a maintenance program with the appropriate records maintained.
1.3	Tyres, Brakes & Suspension
1.3.1	All vehicles shall be fitted with tyres with tread depths in accordance with the statutory minimum
1.3.2	Retread tyres shall not be used on steer axles.
1.3.3	All vehicles have fully functioning brake systems with linings and brake discs meeting minimum wear tolerances.
1.4	Vision
1.4.1	All vehicles fitted with left and right hand wing mirrors, and convex mirrors for blind spots.
1.4.2	All vehicles fitted with operating headlights, direction indicators, tail/brake lights and windscreen wipers.
1.4.3	In countries where it is not yet a legal requirement, It is recommended that reflector strips (i.e. conspicuity tape) be fitted to the rear perimeter and sides of vehicles, consistent with local laws and regulations.
1.5	Visibility & Protection to other road users
1.5.1	All vehicles have an operable horn/warning device.
1.5.2	In countries where it is not already a legal requirement, it is recommended that the vehicles are fitted with a backing alarm.
1.5.3	All vehicles to be fitted with mudguards and mud flaps.
1.5.4	All delivery vehicles larger than 12.5 tonnes shall have rear under run protection to protect against damage from rear end collision and to prevent contact by the colliding vehicle with the chassis rails.
1.6	Driver & Passenger Safety
1.6.1	Vehicles shall be fitted with a three-point integrated seat belt for each occupant seat.
1.6.2	All windows (doors, windscreen, and cabin rear) shall allow unimpaired vision (i.e. no cracks, etc.).
1.6.3	All vehicles shall have stowage devices so that equipment is not free to move around in the cabin (e.g. jacks and tools).
1.6.4	All vehicles shall carry a fit-for-purpose first aid kit.
1.7	Legislation
1.7.1	Vehicles shall not exceed the legal axle loads as set down in the country or area of operation.
1.7.2	All vehicles meet the emission standards in their country or area of operation.
1.7.3	All vehicles meet the licensing requirements of the country or area of operation.
1.8	Control and enforcement
1.8.1	All vehicles shall have an operational speedometer
1.8.2	All vehicles must be fitted with an operational vehicle driving monitor (e.g. Tacho) that must be capable of recording individual driver's driving and resting hours, speed, harsh acceleration and harsh deceleration as a minimum.
1.8.3	It is recommended to install in the trucks a satellite tracking system.

2: Requirements trailers

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2.1	General trailer requirements
2.1.1	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.
2.1.2	The roof, walls and tarpaulin/ curtain must be free of holes and protect the cargo against normal weather conditions.
2.1.3	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)
2.1.4	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
2.1.5	A sufficient number of lashing points (minimum 12 pairs) , designed for a minimum force of 2000 daN must be fitted in order to allow lashing according to the load securing requirements as described in section 9
2.1.6	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 section 9
2.2	Specific requirements for container chassis
2.2.1	All twist locks must have securing pins which must be in place during transport .
2.2.2	Full inspection of twist lock integrity must be controlled via a routine maintenance inspection program
2.3	Tilt trailers and trailers with removable stanchion poles
2.3.1	<p>Tilt trailers (trailers with tarpaulins which need to be put on the roof for loading/ unloading) are not accepted.</p> 
2.3.2	<p>Trailers with removable stanchion poles are not accepted.</p> 
2.4	Curtain sider or tautliner (trailers with curtains which slide along the roof structure)
2.4.1	Curtain siders must be equipped with horizontal wooden or aluminium side planks (at least 4 planks per section between the stanchions). As an alternative, integrated reinforcements in the curtain are accepted.
2.4.2	Curtain siders constructed according to standard EN 12642-XL are preferred but not required.

3: Driver selection, information and training (SEE ALSO APPENDIX 1)

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3.1	Drivers must be able to communicate in one of the languages used at the loading/ unloading sites or they must at least be able to communicate by using a basic set of 142 expressions in English in accordance with the ECTA Guidelines: <u>Best Practice Guidelines for safe (un)loading of road freight vehicles covering technical, behavioural and organisational aspects</u> . (Also on the www.transperanto.org web site).
3.2	The LSP must have a policy in place for driver selection . This policy will include theoretical and practical evaluations (including medical exams) that drivers must pass according to their route, products and type of vehicle, as well as other elements that prove a positive attitude towards all aspects of HSE. The policy will clearly define the required profile for a driver regarding age, experience, physical condition, knowledge of laws and regulations, etc...including legal documents: license, medical certificate
3.3	All drivers must possess a valid driving license for the class of vehicle being operated and inform their supervisor of any change to the status of their license.
3.4	The LSP must provide each driver with instructions in writing (a " Driver's Manual "), which will include all day to day instructions, operating procedures, daily checks etc.
3.5	Drivers shall successfully complete an on-road driving assessment as part of their recruitment/selection.
3.6	All drivers shall undertake a defensive driving training and assessment within six months of commencing driving on Ineos O&P business and refresher training/assessment must be completed at least every three years thereafter. A BBS training according to the ECTA/ CEFIC 'Behaviour Based Safety Guidelines for safe Driving of Road Freight vehicles' meets the requirements of an INEOS O&P approved defensive driving course. The ECTA/CEFIC guidelines can be download from : https://www.ecta.com/Best-Practices-Guidelines
3.7	Professional drivers must be medically assessed with a minimum follow up every three years to assure that they have the functional capacity to operate a vehicle safely
3.8	A system must be in place to monitor driving quality (e.g. by means of tacho)and appropriate actions must be taken to improve driving quality.

4: Fatigue, Drugs, alcohol and substance abuse and excessive speed

4.1	It must be ensured that reward mechanisms do not provide an incentive for drivers to drive excessive hours (which could lead to them driving whilst tired or fatigued) or drive at excessive speed.
4.2	Drivers are obliged to stop driving if they are tired or fatigued. They should either make alternative travel arrangements or have an appropriate period of rest/sleep before driving.
4.3	It is recommended that drivers are explained the main risks of Tiredness & Fatigue and how to deal with it. This can be done during a toolbox meeting or during a driver meeting. A detailed training package in different languages is available on: www.logisticsmatters.info
4.4	Driving and resting hours must comply with the EU Driving and Resting time directive EC 561/06
4.5	A system must be in place to monitor adherence with the max driving hours' rules and appropriate actions must be taken to address all cases of non-adherence.
4.6	There must be a drugs, alcohol and Substance Abuse Policy which has been formally advised to all drivers. Ineos O & P do not accept driving under influence of alcohol or drugs, even if below the legal limits.
4.7	Ineos O&P expect any driver that is required to take medication that is recognised as having the potential to affect driving performance to report the matter to his management immediately

5: Use of Mobile Phones

5.1	It is the Ineos O&P policy that drivers may NOT use any mobile phone or other two-way communication device, <u>not even handsfree</u> , while a vehicle is in motion.
5.2	A mobile phone policy covering the above must be in place. and available in the driver manual.
5.3	The above rule shall be included in inductions, job orientations and driver training programs

6: Seat Belts

6.1	Seat belts must be worn by all vehicle occupants in vehicles performing transportation services for Ineos.
6.2	A seat belt policy must be in place backed up by a disciplinary policy and a programme for compliance checking
6.3	Regular spot checks must be done by the haulier to ensure that seat belts are being worn
6.4	Hauliers must ban from Ineos work any drivers identified as failing to wear a fitted seat belt whilst the vehicle is in motion

7: Communicate the Ineos O&P safety requirements

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7.1	A document with the main Ineos O&P SITE safety requirements is attached in appendix 1
7.2	A document with the main Ineos O&P safety requirements for sub contractors is attached in appendix 2
7.3	A document with the main Ineos O&P safety requirements for drivers is attached in appendix 3 This document is available in different languages: see www.logisticsmatters.info

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SECTION 3 PERSONAL PROTECTIVE EQUIPMENT (PPE)

3.1 Hauliers must ensure that their drivers use, according to the activity, the Personal Protective Equipment (PPE) that has been supplied to them by the company. PPE must be appropriate and recommended for each activity, must be in good working order and must be replaced upon presenting signs of wear. The haulier must maintain a register of periodical inspections of PPE.

3.2 Ineos O&P have defined the **minimum** requirements for PPE when drivers or operators are engaged in Logistics activities involving Ineos O&P products. The locations where these PPE requirements apply are indicated below. **More stringent PPE requirements may apply at other locations** (e.g. at customer premises). The PPE requirements do not apply when driving on the public road except for the Hi Vis jackets which must be worn when the driver has to leave his truck in case of problems.

3.3 Minimum requirements:

- **Light eye protection (safety glasses)**
- **Safety shoes**
- **Helmet**
- **Hi-vis jacket**
- **Gloves**
- **Overall (see below)**

3.4 Site specific Requirements for Overalls:

Site	Location	Standard overall	FRC Overall
Grangemouth	PLS logistics	X	
Köln	Whole site		X
Lavera	Whole site		X
Lillo	Logistics area	X	
Geel	Logistics area	X	
Sarralbe	Logistics area	X	
Rosignano	Logistics area	X	
Bamle	Logistics area	X	

Note: for re-fuelling LPG powered forklifts (with fixed tanks), an FRC overall must be worn
Definitions:

Light eye protection	Safety spectacles to EN 166F or equivalent
Safety Shoes	Ankle high, chemically resistant with steel toe and sole and antistatic sole to ISO 20345 – S2 or equivalent.
Helmet	Helmet to EN397 or equivalent.
Hi-vis(ability) Jacket	Jacket to EN 471 class 2 or equivalent. To be worn when specifically required on sites and when working on (public or private) roads, during shunting operations and at places with bad visibility. It is especially important that a jacket is worn in areas of high Fork Lift Truck activity.
Standard Overall	One or two piece overall
FRC (Flame Retardant) Overall	One or two piece overall with long trousers and long sleeves. Antistatic according to EN 1149 (EN 1149-1 or pr EN 1149-3) and flame retardant according to EN 531 (A, B1, C1, E1).

SECTION 4: ASSESSMENT OF THE COMPETENCE OF HAULIERS

- 4.1 Within six months of commencing driving on INEOS O&P business all hauliers must have a valid SQAS report (Safety Quality Assessment System) for all individual depots which can be used for Ineos O & P service AND an action plan for improvement.
- 4.2 Ineos O & P have set criteria for evaluating the SQAS Assessment reports. The Ineos O&P template used for assessing the SQAS reports of hauliers is available upon request.
- 4.3 Where any deficiency is noted between the SQAS Assessment Report and the specific criteria set by Ineos O & P, these deficiencies will be examined with the haulier and an action programme with timetable for rectification agreed. The action plan must be approved by the Ineos O&P logistics HSE manager and it will be reviewed with the haulier on an annual basis.
- 4.4 The Ineos O & P Contract Managers are responsible for monitoring haulier's improvement programmes to ensure that all required actions are completed within the agreed timescales.
- 4.5 Although a formal evaluation of the haulier's safety and quality management systems is required at intervals not exceeding three years, Ineos O & P will also monitor the performance of hauliers on a continuous basis. Records of safety and quality non-conformances will be reviewed at the **Quarterly Performance Review (QPR) meetings**.
- 4.6 Info on SQAS, including the SQAS questionnaires, is available on the CEFIC website: www.sqas.org
- 4.7 On top of the SQAS evaluation, Approved Hauliers also need to meet the Ineos Driving Safety Standard which is shown in [Section 2](#) of this manual. The Contract managers must ensure that the hauliers meet this standard within the specified time frame and that regular audit and spot checks are organised to check the compliance against this standard.

SECTION 5: SUBCONTRACTING OF TRANSPORT SERVICES

- 5.1 Hauliers are permitted to use subcontractors. The hauliers must
- Define their minimum safety requirements and have a system to follow up the performance of the sub contractors.
 - Have an effective means to communicate the Ineos O&P safety requirements to the sub contractors. As a minimum, the document as attached in [appendix 2](#) must be made available to the sub contractors.
 - Sites will do regular spot checks by using the Ineos O & P questionnaire which is attached in [appendix 4](#).
- 5.2 Owner-drivers working exclusively for an Approved Haulier are not considered as a sub contractor if the operations that they perform are fully controlled by the Approved Haulier and they operate fully within the Quality and Safety Management systems of the Approved Haulier. These are called 'fully integrated subcontractors'
- 5.3 Ineos O&P do not permit the use of secondary subcontractors. A prohibition on the use of secondary subcontractors must be included in all transport contracts.

SECTION 6: INCIDENTS AND ACCIDENTS

- 6.1 In the event of an incident or an accident during transport, handling, loading and unloading activities Ineos O & P must be informed immediately, **even when the load is not affected.**
- 6.2 The Ineos O&P emergency telephone number is: **+ 44 (0) 1235 23 96 70**
As this Call Centre uses interpreters, the caller can speak his native language.
- 6.3 Ineos O&P require that the haulier must also be able to respond rapidly and effectively if one of its vehicles is involved in an accident emergency. The haulier must have an emergency plan covering response to an accident at any point on the route that the vehicle travels.
- 6.4 In the event of a road accident, Ineos O&P will require the haulier to complete the ' checklist for investigating Road accidents' which is attached in [appendix 5](#)

SECTION 7: NEAR MISS REPORTING

Near misses are unsafe situations which, in slightly different circumstances, could lead to an accident. All LSP's are encouraged to report near misses. Examples are:

- Reversing in a narrow street to reach the unloading place
- Unloading from the public road
- Dangerous Forklift traffic close to pedestrians, no segregation.
- Trailer curtain caught by heavy wind
- Driver climbing on top of his trailer
- Double stacked pallet leaning over dangerously
- Mobile ramp not connected to the container chassis during loading
- Unsafe traffic situations in general
-

A standard form to report near misses is attached in appendix 7

The form is available in other languages on : www.logisticsmatters.info

SECTION 8: LOADING/ UNLOADING REQUIREMENTS

8.1 PPE

All necessary protective clothing and emergency equipment should be issued or available to all personnel engaged in the loading of product at filling points, and those personnel trained in its use. The Site requirements for all personnel engaged in the loading of vehicles must adhere to the wearing of protective clothing and equipment, whether or not such personnel are Company employees.

8.2 Forklift Segregation

At all Ineos O & P sites, Forklift segregation rules are in place.

Activities which are not required for loading (e.g. load securing, closing the curtains etc..) are NOT allowed during loading. Activities which are necessary for the loading process (e.g. moving stanchion poles from one side to the other and opening curtains to allow the continuation of the loading) are allowed but only when the Forklift has stopped the loading activity and has left the loading zone. The forklift operators are instructed to stop the loading activity each time the driver leaves his cabin during loading.

Preparing the vehicle for loading , load securing and preparing the vehicle for departure, must be done before and after the loading process.

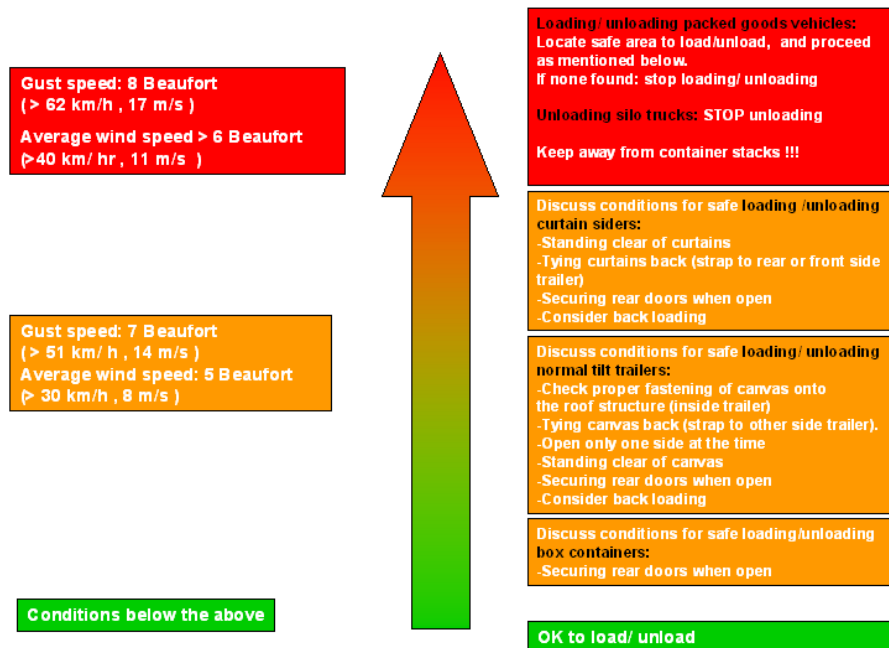
A safety video to explain the principles has been issued and must be shown to all drivers before a first loading at an Ineos O & P site. The video is available on www.logisticsmatters.info

The Ineos O & P “*Procedure for the safe use of Forklifts*” is also available on this website.

A safety note on Forklift Segregation is attached in [appendix 6](#)

8.3 Loading/ unloading at high wind speeds

When loading/ unloading at high wind speeds, some restrictions will apply: see flow chart below:



8.4 Loading containers with mobile ramps

- When loading trucks/ containers by using mobile ramps, the trucks/ containers must always be linked properly to the ramps by means of chains.



- Wheel chocks must be placed under the wheels of the truck and, depending of the type of ramp being used, wheel chocks must be placed under the wheels of the ramp.

8.5 securing container doors in open position

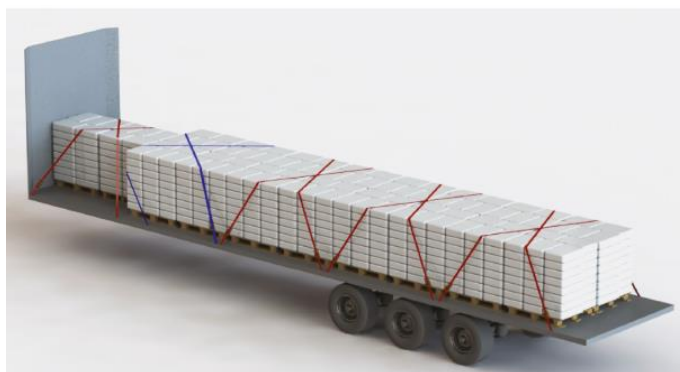
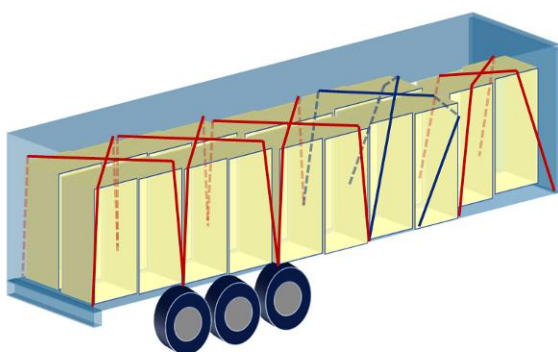
- When containers are loaded/unloaded, the doors must be properly secured in open position to avoid that they are caught by a gust wind. Examples:



SECTION 9: LOAD SECURING (see also Code of Practice for load securing)

- 9.1 Vehicles of packed goods must be equipped with adequate load securing/ protection equipment to maintain the quality of product and packaging during loading/ transit and discharge operations.
- 9.2 It is the driver's responsibility to strap and secure the load in the transport vehicle. For Octabins, the driver will be assisted by an operator in order to place the frames and straps according to the load securing plans.
- 9.3 The main requirements for the trailer are:
- „Fit for loading“ with intact and sufficient lashing rings
 - Sufficient and intact securing straps and ratchets in accordance with standard EN12195-2, these must be regularly inspected.
 - Side support in the form of intact side support bars (lathwork) up to the upper level of the cargo (4-5 pcs per section between the stanchions)
- 9.4 The required number of straps is:
- For a full load of palletised bags: depending on the loading scheme
 - For a full load of Big Bags: one strap per row
 - For a full load of Octabins: 14 straps
- 9.5 Detailed requirements for load securing, including load securing plans, are described in the **Ineos O&P Code of Practice for Load Securing** which is available on: www.logisticsmatters.info

Bags on pallets must be secured according to the 'cross- and spring lashing' method which has been accepted by the European Chemical Industry as the standard method.



SECTION 10: WORKING AT HEIGHT

- 10.1 It is the Ineos O&P policy that working at height can only be allowed when proper fall protection systems are in place.
- 10.2 When climbing onto the trailer deck, or for removing/putting in place the lathwork, the drivers **must** use the safety step ladders/ platforms which are available at all Ineos O & P loading sites.



- 10.3 For removing the planks in the side structure, it is accepted that a 'Fork' is used as long as the driver remains on the ground.
- 10.4 Climbing onto the roof of the trailer is forbidden in all cases.
- 10.5 Safe working at height forms part of the Ineos Life Saving rules. Drivers not adhering to the rules will be banned from the site.

SECTION 11: VEHICLE CHECKS AND NON CONFORMANCES

- **Vehicle checks**

Before loading the following minimum checks will be done:

- The driver wears the required Personal protective clothing
- condition of loading floor OK (no protruding nails, no holes, planks in good condition)
- Required number of straps on board.
- Straps/ ratchets in good visual condition
- No smell inside trailer
- type: curtain sider with **no** removable stanchion poles
- no empty pallets on board (except partial load orders)
- Container doors can be secured in open position

In addition, Ineos O&P will carry out spot checks :

- * General condition of the vehicle (visual condition, no damages, no broken windshield..)
- * Condition lights of vehicle (not broken, not damaged)
- * **Condition of tyres (no bold tyres)**
- * **Condition of twist locks (not damaged, engaged, tightened and secured with locking pins)**
- * Fire Extinguishers (condition, expiry date valid)
- * Random checks for seat belt compliance.

The two criteria in bold will give rise to rejection in case of non compliance (e.g. Bold tyre or twist lock which can not be tightened/ locked)

A checklist is attached in [appendix 4](#).

- **Non-conformances against HSE**

In case of non compliance with the Ineos O&P requirements, a Non Conformance will be raised.

In case of a major infringement against the HSE requirements (e.g. smoking on site), the driver will be banned from the site for a defined period or permanently.

SECTION 12: PARTIAL LOADS AND GROUPAGE

“Groupage”: *The consolidation of several small shipments into a single truck*

It is the Ineos O&P policy to deliver full truck loads only and to have partial loads delivered by distributors.

Partial loads, especially when loaded in groupage trucks, may cause safety problems like inadequate load securing capabilities and risks caused by the load that is already on board of the trucks when they arrive on our sites.

Groupage can only be accepted under the following conditions:

Requirements

- 1: Preference would be that the groupage truck comes to Ineos O&P empty first, and if this is not possible, that there is no need of handling (e.g. moving) the goods, which are already on the vehicle, in order to accommodate the Ineos O&P load. So Ineos O&P will not handle /move the load already on board of the vehicle.
- 2: If there are already goods on board, these goods must
 - * not be ADR classified
 - * not limit the payload to be achieved
 - * not be at risk for our products in terms of quality (i.e. strong odour) stability during transport:
 - they must be properly secured
 - they must not hinder the proper load securing of our goods



Example of groupage shipment which is not acceptable:

- The steel axle is not properly secured
- Our pallets can not be properly secured

Other examples whereby trucks were rejected due to load already on board:



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3: If our goods are not sent directly to our customer but unloaded at a central location, we expect that, when the goods are loaded again for their final destination (2nd leg) , they are loaded and secured according to the same standard as in the first leg.

For octabins:

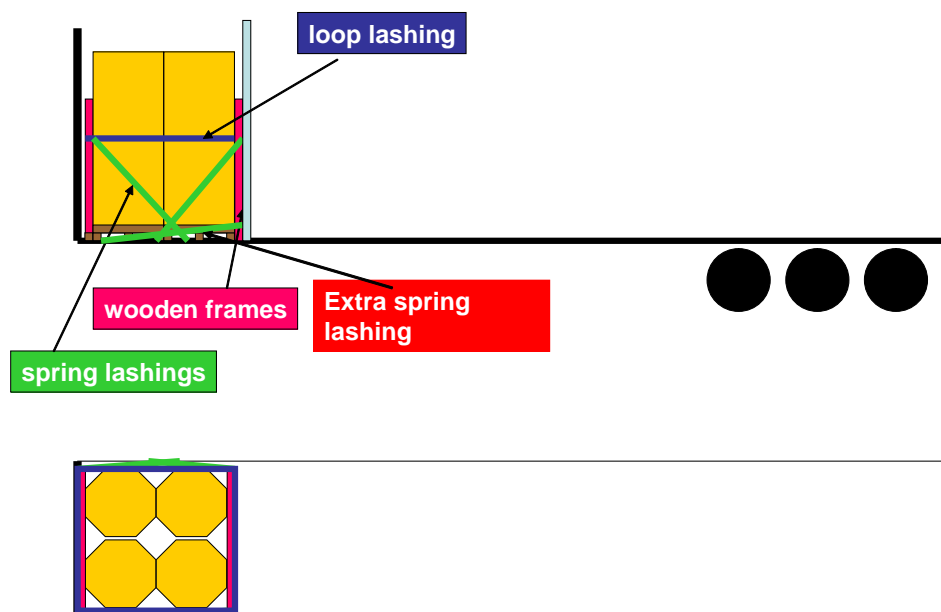
In addition to the above requirements, loading a small number of octabins as partial load or on groupage trucks can only be accepted in exceptional cases and only when:

- The octabins are placed against the headboard or against an intermediate blocking board.
- Dunnage is used to fill up voids
- The Octabins are secured in a block of 4 according to the standard load securing method (in between two frames - spring- and loop lashings).

Full loads of octabins are strongly recommended

A minimum of 2 octabins can be accepted, however it must be emphasized that octabins can only be properly secured in blocks of minimum 4.

Partial load:4 Octabins in curtain sider



Our sites will do the utmost to ensure the above mentioned requirements are met. However partial loads can not always be secured in the same way as full loads and we have no control on what is happening with our goods after leaving our sites.

Therefore Ineos O&P can not be held responsible for any damage to the goods caused by inability to do a proper load securing, subsequent loading of other material on the truck, moving our goods and removing the straps etc...

CODE OF PRACTICE FOR THE SAFE DISTRIBUTION OF POLYOLEFINS IN PACKED FORM

APPENDIX 1 - Main Site safety requirements for drivers

Each Ineos O&P loading site may have different safety requirements. Those requirements which apply on all sites are:





APPENDIX 2

MINIMUM INEOS O & P SAFETY REQUIREMENTS FOR SUBCONTRACTORS

INEOS Olefins & Polymers Europe

Minimum safety requirements sub contractors hauliers packed goods

1	General Vehicle requirements
1.1	Vehicles must meet all legal requirements (e.g. max legal axle loads..)
1.2	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.
2	Load securing requirements
2.1	A sufficient number of lashing points (minimum 12 pairs) , designed for a minimum force of 2000 daN must be fitted in order to allow lashing according to the Ineos O&P load securing requirements.
2.2	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
2.3	Required number of straps: <ul style="list-style-type: none"> • Pallets: Depending on the load scheme (see Ineos O&P Code of Practice for Load Securing). • Octabins: 12
2.4	<ul style="list-style-type: none"> • For pallets and Big Bags, the strapping must be done by the driver. • For Octabins, the strapping will be done by the site personnel with assistance of the driver.
3	Specific requirements for container chassis
3.1	All twist locks must have securing pins which must be in place during transport .
4.	Tilt trailers and trailers with removable stanchion poles
4.1	<div style="display: flex; align-items: flex-start;"> <div style="flex: 1;"> <p>Tilt trailers (trailers with tarpaulins which need to be put on the roof for loading/ unloading) are not accepted..</p>  </div> <div style="flex: 1;"> <p>Trailers with removable stanchion poles are not accepted.</p>  </div> </div>
5	Curtain sider or tautliner (trailers with curtains which slide along the roof structure)
5.1	Curtain siders must be equipped with horizontal wooden or aluminium side planks (at least 4 planks per section between the stanchions). As an alternative, integrated reinforcements in the curtain are accepted.
6	Forklift segregation
6.1	Forklift segregation rules apply at all Ineos O&P sites: The driver must stay in his cabin whilst his vehicle is being loaded. He may only leave his cabin on request of the Forklift driver
7	Working at height
7.1	When working at height, drivers must use the available safety stairs. They are not allowed to climb onto the trailer deck.
8	Seat belts
8.1	Drivers MUST wear their seat belts both on the road and when driving on site !
9	Mobile phones
9.1	During driving, the use of a mobile phone, even hands free, is forbidden
10	PPE
10.1	Drivers must wear the required Personal Protective Equipment on the sites: Overall, safety goggles, hard hat, safety shoes and High Visibility jacket. At Köln and Lavera: a Flame Retardant Overall must be worn
11	Driver training
11.1	Drivers must have received a basic training on defensive driving
12	Unsafe conditions
12.1	All unsafe conditions during loading / unloading and in transit must be reported to Ineos O&P

APPENDIX 3: INEOS O & P MINIMUM SAFETY REQUIREMENTS FOR DRIVERS



When you drive for Ineos Polyolefins, please read and apply the instructions below. These safety requirements are there because we care for your safety !!!

- 1: Please stay in your cab during the loading process, and only leave it on specific request of the loading staff.
- 2: Always use the available safety stairs when working at height!
- 3: The load must be properly secured after loading



- 4: During driving, you are not allowed to use your mobile phone! Studies have shown that If you phone while driving, even hands-free, your chance of having an accident increases by a factor of 4!!
- 5: Always wear your seat belt. One out of every 5 road fatalities could have been avoided if the driver had been wearing his seat belt !!
- 6: Drugs and alcohol are forbidden ! Avoid using medicines which can cause significant daytime sleepiness. Lack of sleep can have fatal consequences when you are driving. Stop driving in time !
- 7: Report all unsafe loading and unloading conditions. By doing something about it, we can avoid accidents !
- 8: Always wear the required Personal Protective Clothing during loading and unloading: Overall, safety goggles, helmet, safety shoes, gloves and HVIS jacket. Some sites require a Flame Retardant Overall.
- 9: And Finally: drive safely ! Adapt your speed in curves and roundabouts !

HAVE A SAFE TRIP !!!

Life keeps apart for safety's sake!

1



2



APPENDIX 4
CHECKLIST FOR VEHICLES PACKED

Location:	
Date of inspection:	
Inspection by:	
Ineos order ref nr:	
Haulier's name:	
If the haulier is acting as a subcontractor: main haulier's name:	
Driver's name:	
Drivers' nationality	
Vehicle registration nr:	
Product:	
Type of packages:	

	Yes	No	N/A
1. Personal protective equipment (PPE) driver			
Safety helmet			
Safety glasses			
Overall with long sleeves			
Safety shoes			
High Visibility jacket			
2. Ineos O & P safety rules			
The driver knows the Ineos O & P Logistics safety rules (safety document)			
The driver knows the site safety rules			
The driver knows the Forklift segregation rules			
3. Vehicle			
General appearance of the vehicle is good			
Twist locks are in serviceable condition and are secured (containers)			
Windscreen in good condition			
Lights in good condition			
Tyres in a good condition			
Seat belts fitted in cabin			
Required nr of load securing straps are on board			
The straps are in good condition and are properly marked (EC mark)			
Sufficient number of lashing rings in the trailer floor			
Sufficient number of side planks (and in good condition)			
Trailer has no heavy detachable stanchion Poles in one piece (Yes if OK)			
The tarpaulin (canvas) is in visual good condition			
4. Training			
The driver has attended a defensive driving training during the last 3 years			
5. Language			
The driver understands/ speaks a local language and/ or English			
6. Load securing			
The driver has secured the load properly after loading			
5. Driving			

CODE OF PRACTICE FOR THE SAFE DISTRIBUTION OF POLYOLEFINS IN PACKED FORM

A seat belt check was done when the driver was driving on site and he was wearing his seat belt.			
A seat belt check was done when the driver was driving off site and he was wearing his seat belt			
Comments:			

APPENDIX 5
CHECKLIST FOR INVESTIGATION ROAD ACCIDENTS

Checklist Road accidents

1: Data

Location of accident:	
Date of accident:	
Alliance involved:	
Haulier involved:	
Type Vehicle involved:	
Product/ ref nr:	
Product quantity:	
Loading place:	
Destination:	
Tractor/ trailer plate nrs	
Name driver involved	
Other vehicles involved	
Other people involved	

2: Accident description

Description accident:	
Driver declaration	
Cause of accident according to driver	
Speed at time of accident ?	
Driver injuries	
Other people injured ?	
Load damaged/ spillage	
Other damage ?	
Road conditions	
Cruise control switched on ?	
Driver under time pressure ?	
Immediate actions taken	
Recovery operations	
Media attention	
Road blocked ?	
What happened to the product ?	

CODE OF PRACTICE FOR THE SAFE DISTRIBUTION OF POLYOLEFINS IN PACKED FORM

3:Time log and communications

Date/time	Description	Info source

4 Road/Vehicle Accident Checklist

Cat.	Question	Yes	No	Comments/ Evidence/ Applicability
D R I V E R	Did the driver; 1. Hold a valid licence for the class of vehicle involved in the incident? 2. Use the vehicle for Ineos business 3. Was familiar with this specific vehicle?			
	Did the driver complete an Ineos approved driver-training programme?			
	Is there any evidence to suggest the driver drove the vehicle below the expected standard?			
	Is there evidence to suggest the driver might have been impaired in any way? (Fatigue, drugs, medicines, alcohol...)			
	Was the driver medically fit ?			
	Where seat belts fitted and correctly worn by all vehicle occupants?			
	Was any communication device in the vehicle used during any time of the journey?			
V E H I C L E	Was the vehicle involved "fit for purpose"			
	Was the vehicle in good operating condition?			
	Is there a record of the 1. Drivers recent work record 2. Vehicle recent work record			
	Was the load including passengers secure and within legal and/ or design limits for the vehicle?			
	Was the vehicle; A) Stationary? B) Utilising "Right off Way"? C) Manoeuvring? D) Other			
	Describe the weather conditions at the time of the incident using either; Good, Average or Bad			
	Had the driver completed this journey and or task previously?			
3rd Party	Was a third party Involved?			
	Did 3 rd Party driver and/ or Vehicle conform to all legal regulations/ requirements			
	Has anyone indicated liability			

5: Driver Tiredness:

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Duty History	Duty hours	Total work Time	Driving hours	Rest
Day of crash				
Day before crash /				
2 Days before crash /				
3 Days before crash /				
Sleep History	Sleep periods		Naps	comments
Day of crash				
Day before crash				
2 Days before crash				
3 Days before crash				

6: Info haulier

Description of company	
SQAS, ISO9000, others....	
Fixed subcontractor/ spot subcontractor	

7:Info driver:

Name	
Age	
Years of experience in driving heavy vehicles	
Years worked for this haulier	
Training history	
Last medical test	

8:Info vehicle

Last technical inspection tractor	
Last technical inspection trailer	
Tractor first registered	
Trailer first registered	
Tyres report	
ABS fitted ?	
Anti roll over systems fitted ?	

9: Ineos safety Policy

How is the Ineos safety Policy communicated to the drivers	

10: Load securing (packed goods)

Has the trailer a side structure (side panels and /or lath work) allowing to absorb sideways 30 % of the cargo load ?	
Was the load strapped ? describe how	

11: Other info

APPENDIX 6: FORKLIFT SEGREGATION PRINCIPLES

INEOS
Polyolefins

Let's keep apart
for safety's sake!



APPENDIX 7: NEAR MISS FORM

INEOS Olefins & Polymers Europe

UNSAFE CONDITIONS ?

Ineos ref nr:	
Customer name:	
Date:	
Name Haulier:	
Name driver:	


Loading location

	Yes	No	Comment
Have you encountered unsafe situations during the loading? If yes, please state which.			

Journey

	Yes	No	Comment
*Have you encountered unsafe situations during the journey? If yes, please state which.			

Delivery location

 <p>PACKED</p>	Yes	No	Comment

* SAFE access to the unloading area?

* Unsafe conditions noticed?

If yes, please describe.