



**CODE OF PRACTICE FOR
THE SAFE PRE- AND ON CARRIAGE
OF CONTAINERS**

**November 2022
Version 7**

FOREWORD

INEOS Olefins & Polymers North Europe,
INEOS Olefins & Polymers South Europe,
INEOS Olefins & Polymers UK,
INOVYN
Hereinafter referred to as INEOS,

Everyone involved in operations for INEOS must work in accordance with the Ineos Group 10 Behavioural Safety principles and 7 Life Saving Rules which must be adhered to by all Ineos Employees and contractors (including drivers)

BS 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

Life Saving Rules:

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 authorisation.
4. Safety critical devices/interlocks must not be disabled or overridden without authorisation
5. Persons working at height must use proper fall protection
6. No entry to confined space without authorisation and gas test
7. Lifting & hoisting – no unauthorised person to enter the defined danger zone where objects can fall.

CODE OF PRACTICE FOR THE SAFE PRE- AND ON CARRIAGE OF CONTAINERS

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 *Code of Practice for the safe pre- and on carriage of containers* has been prepared to help fulfil this aim.

This Code of Practice is published on the INEOS O&P North Logistics SHE sharepoint site: [Link to internal sharepoint site](#)

It is also available to our Logistics Services Suppliers on the [logisticsmatters public site](#): [www.logisticsmatters.info](#) or on the [Direct link to the Code of Practice](#)

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.

Reference: plastic raw materials pollution – invitation to join the Operation Clean Sweep® programme

Marine plastics litter can bring harm to the environment and is a major concern of society, authorities and industry. No matter its source, marine litter is unacceptable. Plastics raw materials – under the form of pellets, flakes or powders - are also frequently among those marine litter items found on beaches and in the gut of birds.

Unintentional pellet loss occurs at different stages along the plastics value chain, including transport and logistics, trading, distribution, recycling and waste management. The collaboration of all partners handling plastic pellets is therefore key to achieving the common goal of zero pellet loss. We all have a responsibility in keeping our environment free of plastics pellets.

Authorities, NGOs, academics and media in Europe and in Belgium are showing growing interest in pellet loss and requesting action from the industry. The plastics value chain is rolling out Operation Clean Sweep® (OCS), demonstrating responsible plastic pellet handling resulting in systematic pellet losses prevention. OCS is intended to demonstrate the plastics value chain's efforts as stewards for the environment, increase own efficiency and safety due to less losses and as such, prevent negative reputation and image of the plastics value chain.

Worrying pictures of significant pellet loss incidents are regularly shared with us, showing the significant need and urgency to take action. Help us by raising awareness among your employees, train them on proper pellet handling, and control your installations. Plastic pellets have to stay contained at each handling step.

Hereby we would like to encourage you to join the voluntary and free of charge Operation Clean Sweep® programme, and sign its pledge.

SCOPE

This Code applies to the road transport of containers to and from container terminals, including loading at Ineos O&P Europe sites and delivery to the final destination.

DISTRIBUTION LIST

Copy No : **Issue To:**

One master copy kept by the O&P Logistics HSSE advisor

REVISION DETAILS

<u>Rev No:</u>	<u>Details of Change</u>	<u>Date</u>
2	Emergency telephone number	January 2012
3	Minor changes	January 2015
4	Minor changes	January 2016
5	Adding INEOS Life Saving Rules SQAS requirement for hauliers PPE requirements for INEOS sites Introduction OCS programme/pledge	November 2020
6	Updating standard Safety Shoes to ISO.	June 2022
7	Update in subcontracting section 4.	November 2022

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SECTION 1**DRIVING SAFETY STANDARD**

The following comprises a basic set of safety requirements which must be met for all INEOS O&P logistics activities including specs of vehicles 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	Remoulded, regrooved or remixed tyres shall not be used on steering 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 <u>recommended</u> 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 <u>recommended</u> 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.

2. Requirements trailers

2.1	Specific requirements for container chassis
	<p>Containers must always be placed at the back of the container chassis. No 20" containers to be placed on a 30/4" multi chassis trailers</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div>
2.1.1	All twist locks must be in good condition and must be fitted with securing pins which must be in place during transport .
2.1.2	Full inspection of twist lock integrity must be controlled via a routine maintenance inspection program

3. Driver selection, information and training

3.1	The haulier 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 HSSE. 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.
3.2	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.
3.3	The haulier 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.
3.4	Drivers shall successfully complete an on-road driving assessment as part of their recruitment/selection.
3.5	All drivers shall undertake a defensive driving training (BBS-driving according to ECTA guidelines or equivalent) within one year of commencing driving on INEOS O&P business..
3.6	There must be an up-to-date register of all driver trainings

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	Drivers must be explained the main risks of Tiredness & Fatigue and how to deal with it. Information 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	There must be a drug, alcohol and Substance Abuse Policy which has been formally advised to all drivers.
4.6	INEOS O&P expects 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, not even handsfree, while a vehicle is in motion.
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6. Seat Belts

6.1	Seat belts must be worn by all vehicle occupants in vehicles performing transportation services for Ineos.
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7. Communicate the Ineos O&P safety requirements to drivers

7.1	A document with the main INEOS O&P safety requirements is attached in <u>appendix 1</u> and must be made available to all drivers
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SECTION 2 PERSONAL PROTECTIVE EQUIPMENT (PPE)

2.1 INEOS O&P have minimum PPE requirements for drivers when they come on one of their sites. 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.

- 2.2 Minimum requirements:
- **Light eye protection (safety glasses)**
 - **Safety shoes**
 - **Helmet**
 - **Hi-vis jacket**
 - **Overall (see below)**
 - **Leather gloves (in Sarralbe)**

2.3 Site specific Requirements Overalls (for drivers):

Site	Location	Standard overall	FRC Overall
Grangemouth	PLS Logistics	X	
Köln	Logistics area	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	

Definitions:

Light eye protection	Safety spectacles to EN 166F or equivalent
Safety Shoes	Ankle high, chemically resistant with steel toe and sole and anti static 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.
<u>Standard</u> Overall	One or two piece overall
<u>FRC</u> (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 3: ASSESSMENT OF THE COMPETENCE OF HAULIERS

- 3.1 INEOS O&P **requires** their hauliers for pre- and on carriage to be SQAS assessed ('Transport Service' module). All info on the SQAS assessment system can be found on: www.sqas.org.
- 3.2 INEOS O&P have set criteria for evaluating the SQAS Assessment Reports.
- 3.3 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.
- 3.4. In the absence of an SQAS assessment, INEOS O&P may decide to carry out an own safety audit to gain assurance that the minimum safety requirements are met.

SECTION 4: SUBCONTRACTING OF TRANSPORT SERVICES

- 4.1 Hauliers are permitted to use subcontractors provided that it is ensured that the subcontractor meets all the Ineos O&P requirements. Hauliers are permitted to use subcontractors provided the following principles are met:
 - **Fully integrated subcontractors:** These are fully integrated in the main haulier's management system and therefore fully under control of the main haulier. These sub contractors are typically driving exclusively for the main haulier. These sub contractors must meet the same requirements as the main haulier (receive driver's manual, driver training, drivers receive direct instructions from the haulier etc...).
 - **Non Fully Integrated subcontractors:** These sub contractors are not fully integrated in the main haulier's management system and it is the main haulier's responsibility to assess the sub contractor against their standards by using the SQAS system **or** to carry out own audits, and to follow up the performance of the sub contractors. The main haulier also must have a system to communicate the Ineos safety requirements to the sub contractors.
 - **Spot subcontractors:** These are normally used in exceptional cases and the main hauliers have normally no contractual arrangements with these companies. Spot chartering is only allowed on exceptional basis.
- 4.2 Ineos does not permit the use of secondary subcontractors. A prohibition on the use of secondary subcontractors must be included in all transport contracts.
- 4.3 The haulier must 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 1 must be made available to the sub contractors. The form is available in other languages on: www.logisticsmatters.info.

SECTION 5: INCIDENTS AND ACCIDENTS

- 5.1 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**.
- 5.2 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.
- 5.3 INEOS O&P requires 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.

SECTION 6: NEAR MISS REPORTING

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

- Reversing in a narrow street to reach the unloading place
- Unloading from the public road
- Unsafe traffic situation on the container terminal

A near miss form is attached in appendix 3.

SECTION 7: LOADING REQUIREMENTS

Forklift Segregation

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

The driver needs to remain in his cabin during the whole loading process. The forklift operators are instructed to stop the loading activity each time the driver leaves his cabin during loading.

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

A safety note on Forklift Segregation is attached in appendix 2

SECTION 8: VEHICLE SPOT CHECKS

At the INEOS O&P loading sites, Ineos may carry out spot checks of vehicles/ drivers in order to check compliance against the Ineos O&P safety requirements.

8.1: Random Spot checks at arrival trucks at the Ineos loading sites

- *General condition of the vehicle
- *Condition lights of vehicle (not broken, not damaged)
- ***Condition of tyres (no bold tyres)**
- ***Condition of twist locks (can be tightened and locked)**
- *Fire Extinguishers (condition, expiry date valid)
- *Required PPE being worn by the driver (according to Ineos O&P standard)

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

8.2 Seat belt compliance checks

Random checks for seat belt compliance are done on- and off site.

APPENDIX 1A: MAIN INEOS O&P SAFETY REQUIREMENTS

INEOS Olefins & Polymers Europe

When you drive for Ineos O&P, 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.

Let's keep apart for safety's sake!



2: 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 !!



3: 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 !!



4: **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** !



5: Report all incidents and **unsafe loading and unloading conditions**. By doing something about it, we can avoid severe accidents !



6: Always wear the required **Personal Protective Clothing** during loading and unloading: Overall, safety goggles, helmet, safety shoes, gloves and HIVIS jacket. Some sites require a Flame Retardant Overall.



7: And Finally: drive safely ! Adapt **your speed in curves and roundabouts** !



HAVE A SAFE TRIP !!!

APPENDIX 2: FORKLIFT SEGREGATION PRINCIPLES

INEOS
Polyolefins

**Let's keep apart
for safety's sake!**



1



2

APPENDIX 3: 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.			

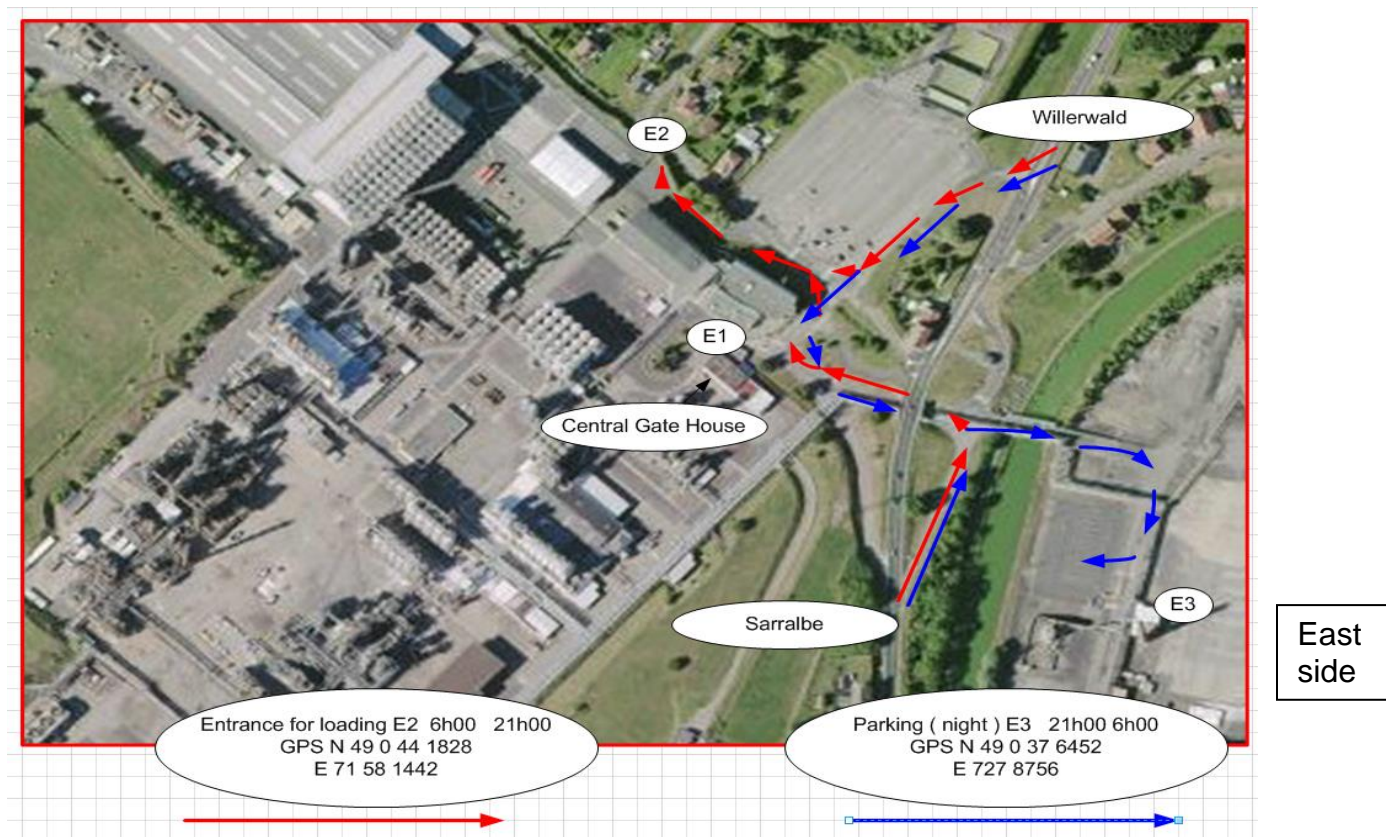
Delivery location

	Yes	No	Comment
* Safe access to the unloading area?			
* Unsafe conditions noticed? If yes, please describe.			

APPENDIX 4 : Pre-carriage from Sarralbe

1) LOADING LOCATION AND OPENING HOURS

INEOS Polymers Sarralbe SAS
Rue Ernest Solvay
Plateforme LOGMAPLAST (Entrance E2)
F – 57430 SARRALBE



If a truck arrives before 6.00 am, **it's strictly forbidden** to stay in front of the gate E2, waiting the opening hour. The driver must park the truck at the east side of the plant as mentioned in the map where he can find a dedicated parking (near Entrance E3). To use this parking, a previous registration at the Central Gate House (entrance E1) is mandatory.

A paper badge will be provided, which has to be placed behind the windshield.
The local police may carry out checks and without the badge, will be obliged to awake the driver.

Opening hours: Monday to Friday (no loading in case of bank holidays) :

Packed loadings : **08.00 am – 4.00 pm** , last presentation of truck **3.30 pm**

Bulk loadings : **06.00 am - 9.00 pm** , last presentation of truck **7.00 pm**