



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

**October 2023
Version 8**

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 [logistics matters 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® program and sign it's 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
8	General update.	October 2023

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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

General Vehicle Requirements	
1.	Engines must meet, as a minimum, the Euro 5 norm. Euro 6 is preferred. For Euro 6 engines, drivers must be informed that regeneration of the particulate filter is not allowed on any Ineos O&P site.
2.	Vehicles and equipment shall be fit-for-purpose conforming to recognized specifications.
3.	All storage and box containers on delivery vehicles shall be securely anchored to the chassis.
4.	All equipment shall be in good working order with no visible leaks (e.g., hydraulic oil)
5.	All vehicles, and the equipment fitted to them shall be included in a maintenance program with the appropriate records maintained.
6.	All vehicles shall be fitted with tyres with tread depths in accordance with the statutory minimum. Remoulded, regrooved or remixed tyres shall not be used on steering axles.
7.	All vehicles have fully functioning brake systems with linings and brake discs meeting minimum wear tolerances.
8.	All vehicles fitted with left- and right-hand wing mirrors, and convex mirrors for blind spots. Mirrors can be replaced by innovative camera systems for safety improvement.
9.	All vehicles fitted with operating headlights, direction indicators, tail/brake lights and windscreen wipers.
10.	All vehicles have an operable horn/ warning device.
11.	All delivery vehicles shall have hose/ tool stowage areas that allow these items to be safely secured to the vehicle.
12.	All vehicles to be fitted with mudguards and mud flaps preferably not retaining plastic pellets. (Home : OpCleanSweep)
13.	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.
14.	Vehicles shall be fitted with a three-point integrated seat belt for each occupant seat.
15.	All windows (doors, windscreen, and cabin rear) shall allow unimpaired vision (i.e., no cracks, etc.).
16.	All vehicles shall have stowage devices so that equipment is not free to move around in the cabin (e.g. jacks and tools).
17.	All vehicles shall carry a fit-for-purpose first aid kit.
18.	All electrical systems shall be in sound condition, securely fastened and with connections in appropriate junction boxes.

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19.	Vehicles shall not exceed the legal axle loads as set down in the country or area of operation before or after loading.
20.	All vehicles meet the emission standards in their country or area of operation.
21.	All vehicles meet the licensing requirements of the country or area of operation.
22.	All vehicles shall have an operational speedometer
23.	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. (as per European and local legislation)

2. Requirements trailers

Specific requirements for container chassis	
1.	<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.	<p>All twist locks must be in good condition and must be fitted with securing pins which must be in place during transport. A twist lock indicator is recommended on each twist lock with a minimum length 20 cm and preferably painted yellow. It must indicate the open/ close position of the twist locks.</p>
3.	<p>Full inspection of twist lock integrity must be controlled via a routine maintenance inspection program</p>

3. Driver selection, information and training

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.
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.	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.
4.	Drivers shall successfully complete an on-road driving assessment as part of their recruitment/selection.
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.
6.	There must be an up-to-date register of all driver trainings.

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

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.
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.
3.	The driver training programme must include a part on the risks of tiredness and fatigue. (Example of a training package can be obtained from Ineos O&P and is also available on www.logisticsmatters.info)
4.	There must be records of attendance at driver tiredness/ fatigue awareness trainings.
5.	A system must be in place to monitor adherence with the max driving hours' rules (EU Directive) and appropriate actions must be taken to address all cases of non-adherence.
6.	There must be a drugs, alcohol and Substance Abuse Policy which has been formally advised to all drivers
7.	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
8.	Where the country legal system allows, hauliers should implement a random drug and alcohol testing programme. Drivers identified as failing to comply with the above must be banned from Ineos work.

5. Use of Mobile Phones

1.	Ineos O&P strongly recommend hauliers to discourage their drivers from using mobile phones while a vehicle is in operation.
2.	A mobile phone policy covering the above must be in place. and available in the driver's manual.
3.	The above rule shall be included in inductions, job orientations and driver training programs
4.	Where country legislation allows, Ineos O&P require hauliers to conduct checks on the adherence to this policy by carrying out spot-checks. These checks should include checks on the equivalence between telephone bills and vehicle data recorders

6. Seat Belts

1.	Seat belts must be worn by all vehicle occupants in vehicles performing transportation services for Ineos O&P. This also includes driving on Ineos O&P sites or at Customer's premises.
2.	A seat belt policy must be in place backed up by a disciplinary policy and a programme for compliance checking
3.	Regular spot checks must be done by the haulier to ensure that seat belts are being worn
4.	Hauliers must ban from Ineos O&P 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 to drivers

1.	A document with the main Ineos O&P safety requirements is attached in <u>appendix 1</u>
2.	Driver safety instructions which apply at all Ineos O&P sites: <u>Appendix 2</u>

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 leaves 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	
Bamble	Logistics area	X	

Definitions:

Fall arrest harness	According to EN 361 See note 1 below
Light eye protection	Safety glasses to EN ISO 16321-1-2022 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 EN 397:2012 + A1:2012 or equivalent.
Hi-vis(ibility) Jacket	Jacket to EN ISO 20471 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.
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 EN 1149-3) and flame retardant according to EN ISO 11612:2015 (A1, 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: [Drivers Safety Instructions \(ineos.com\)](http://Drivers Safety Instructions (ineos.com))

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](#).

Further info can be found on our Logistics Matters site:

[Ineos O&P Code Of Practice for handling Logistics Near misses and incidents](#)

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

[Transport of Polyolefins in packed form by road \(ineos.com\)](#)

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 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 cannot 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 Olefins & Polymers, please read and apply the instructions below. These safety requirements are there because we care for your safety !!!

1: 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 !!**



2: **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 !!



3: **Always use the available stairs and platforms when working at height**
Put on your safety harness



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 unsafe loading and unloading conditions. By doing something about it, we can avoid accidents!



6: **Always wear the required Personal Protective Clothing during loading and unloading:** Overall, safety goggles, helmet, safety shoes, gloves, HIRIS jacket and safety harness. 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!**



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.			

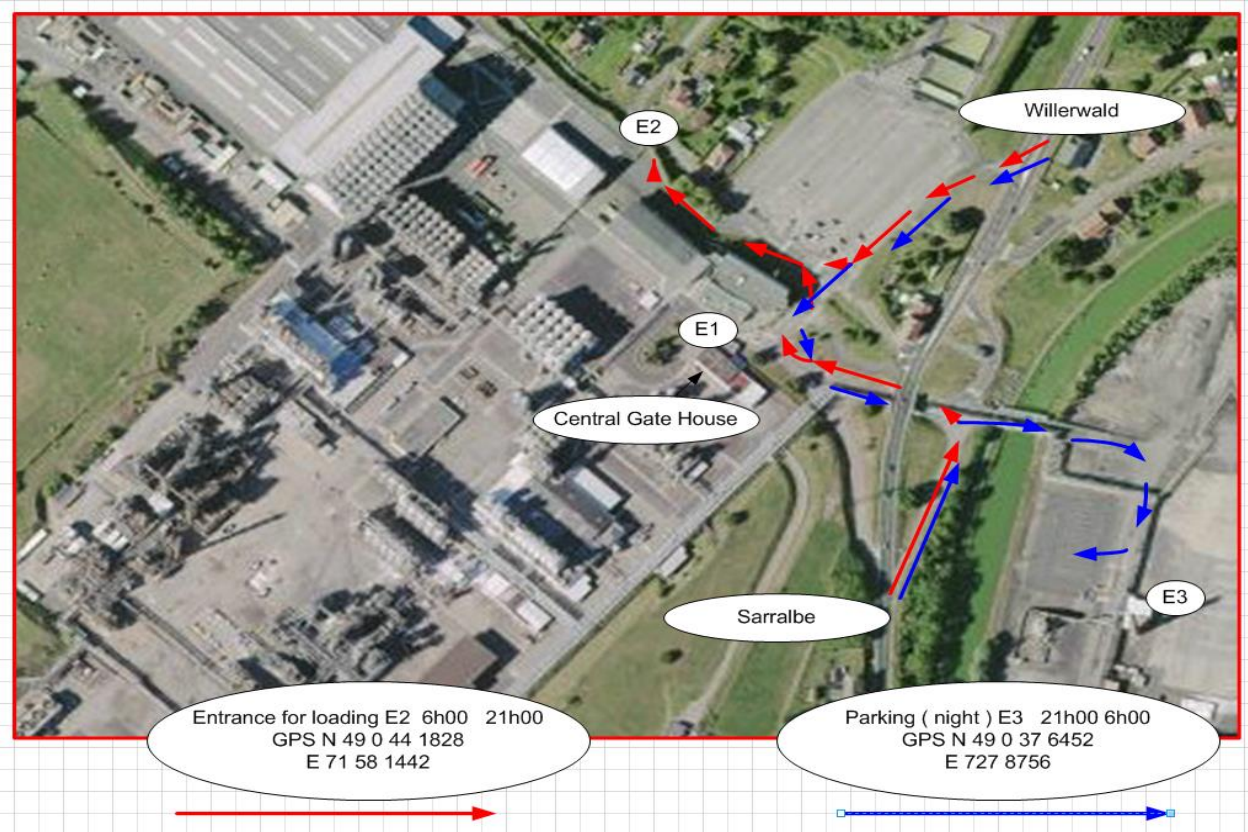
Delivery location

	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 gate E2, waiting for the opening hour. The driver must park the truck at the east side of the plant as mentioned on 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**