



Code of Practice for Safe warehousing

V2 April 2025

FOREWORD

It is Ineos Olefins & Polymers Europe 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 safe warehousing*' has been prepared to help fulfill this aim. The Code should therefore be followed by those Departments of the Company concerned with distribution activities in Europe.

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

<http://www.logisticsmatters.info/>

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DISTRIBUTION LIST

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Issue To :

One master copy kept by the Olefins & Polymers Europe Logistics Safety Manager.

MAIN REVISION DETAILS

Rev No :

Details of Change

Date

SCOPE

This Code applies to the storage and handling in warehouses of non dangerous packed goods: polyethylene and polypropylene.

It is primarily based on the CEFIC SQAS Warehouses questionnaire v 2011, and existing Codes of Practice: Forklifts, Traffic and transport of packed goods

In the document, reference is made to the SQAS question numbers and Ineos ref nrs in the relevant Codes of Practice

SECTION 1: REQUIREMENTS FOR SAFE WAREHOUSING

Question nr	SQAS ref nr/ Ineos COP ref nr	
		1: Fire Plan
1.1	4.1.1.1.	A fire risk assessment must be performed together with the responsible local authorities and the local Fire Brigade, and the fire plan must be implemented.
1.2	4.1.1.3	An up to date Fire Plan must be handed over to the local authorities/ local Fire Brigade or they must have access to the Fire Plan at any time on-site
1.3	4.1.1.4	The Fire Plan must be updated periodically (less than 5 years) to reflect significant changes related to the products stored, the quantity stored and the constructional, technical and administrative fire protection features
		2: Access and emergency exits
2.1	4.1.3.1	There must be unrestricted site access (to premises and buildings) to the emergency service at all times (24h and 365d per year)
2.2	4.1.3.2	There must be sufficient emergency exits (at least two per fire compartment creating separate escape routes) and are these must be clearly marked, with unrestricted access at all times.
		3: Fire protection
3.1	4.1.4.1	The Fire Plan must address the required fire water supply for the warehouse in terms of volume, pressure and reliability
3.2	4.3.1	The technical fire protection of the warehouse (e.g. smoke detection, fixed extinguishing system, smoke and heat vents, fire extinguishers) must comply with the local regulations and standards and it is documented in certificates
3.3	4.3.3	Fire protection equipment is maintained, tested or checked on a regular basis
3.4	4.3.5	Products and combustible materials must be stored away from heating systems at a distance of at least 1.5 m
3.5	4.4.1	safety notices and 'No-smoking' signs must be clearly visible
3.6	4.4.2	In case of emergency, there must be a procedure for safe evacuation
3.7	4.5.6	Vegetation in fire risk areas must be controlled
		4: General
4.1	5.1.1	The warehouse structure must be in visibly good condition
4.2	5.1.2	Housekeeping in the warehouse must be at a good standard (e.g. clean, tidy, paintwork, no spills, no tripping hazards etc.) and regular housekeeping checks must be done.
4.3	5.1.3	A sanitation procedure must be in place to control pest such as rodents, bugs and birds
4.4	5.1.21	Waste must be disposed in a safe and practical way and waste bins must be available and emptied regularly
4.5	8.1.2	All processes defined in the warehouse scope must be covered in

		written operating procedures
4.6	8.1.5	personnel working in the warehouse must be suitably trained. Apart from operational activities ,the training must also include: dealing with emergencies: use of fire extinguishers, emergency escape, mustering procedure etc...
4.7	8.1.8	there must be a documented programme for preventive inspection and maintenance covering the following items : 8.1.8a - warehouse equipment 8.1.8c - fire and smoke detection system 8.1.8d - manual fire alarm system 8.1.8e - emergency alarm system (audible and/or visual) 8.1.8f - smoke vents 8.1.8g - fixed extinguishing systems (eg sprinkler) 8.1.8h - fire extinguishers 8.1.8i - fire pumps 8.1.8j - fire doors 8.1.8k - lighting system, electrical installation and earthing systems
		5: Storage conditions
		Storage in RACKS
5.1	5.2.1	The racking systems must be in accordance with local requirements, in good condition, protected from vehicle collision and from weathering
5.2	5.2.2	Procedures must be in place to monitor and maintain the racking in good condition
5.3	5.2.3	Storage racking must be operated within maximum loading limits
5.4	5.2.4	The maximum weight must be indicated on the racks
5.5	Ineos Unl. packed 5.3	The racking must be fit for purpose, incorporating proper support for the pallet, and designed for at least 1.5 tonnes gross pallet weight. Pallets stored in racking systems must be evenly distributed. The pallets are first tested before storing them in racks
		STACKING
5.6	5.2a Ineos	No double stacking along pedestrian walkways
5.7	5.2b Ineos	A list of non stackable products must be available and updated regularly
5.8	5.2c Ineos	The FL operators have access to the 'no stacking' list and adhere to it
5.9	5.2d Ineos	Pallets with non-stackable products are marked with 'do not stack' labels
5.10	5.2e Ineos	In case of a new product grade or new packaging material (FFS foil thickness) or in case of different storage conditions (temperature..), a Management of Change procedure is applied and stacking tests are done
5.11	5.2f Ineos	In case a pallet has collapsed, a procedure is available for safe evacuation of the collapsed pallets (safely de-stack the other pallets in the area / fence off the danger zone)
5.12	5.2.7	All pallets with bags are stacked in a stable manner
5.13	5.2.7a Ineos	Regular checks of the condition of the stacked pallets are done
5.14	5.2.9	Packaging material is properly stored and identified

5.15	5.2.10	Empty pallets that are stored inside the warehouse must be placed at dedicated places and the quantity must be limited to maximum half-a-day use in production.
5.16	5.2.11	It is recommended that empty pallets are stored outside the warehouse at a safe location
5.17	5.2.12	Stack heights of empty pallets inside and outside the warehouse must be limited to the transport stack height (approximately 3 meters), if not supported.
5.18	5.2.13	There must be floor markings in the warehouse indicating storage spaces and staging areas
5.19	Ineos Unl. packed 5.1	When storing indoor and pallets are close to the warehouse wall, it is recommended to leave a 1 meter distance between pallets and wall, as a way out in case of fire
6: Forklift driving area's/ traffic safety		
6.1	5.1.10	The loading/unloading docks must be safely accessible for vehicles (clearly signed, suitable road width, no difficult turns)
6.2	5.1.11	Loading/unloading docks must be protected against collisions
6.3	Ineos FL 2.1	The roads must be in good condition,(even ground, no potholes....)
6.4	Ineos FL 2.2	Floors must be clean (no oil spills, no water in the warehouse..)
6.5	Ineos FL 2.3	Recommended: Anti-slip coating on the floor in warehouse near the gates (rain water !)
6.6	Ineos FL 2.4	Enough manoeuvring room and height clearance along the routes
6.7	2.5	<u>At these locations where it is practically feasible:</u> install protective barriers and / or clearly marked gangways to separate FL's from pedestrians.
6.8	Ineos FL 2.6	<u>At these locations where it is practically feasible</u> Indicate pedestrian routes by means of lines/markings on the floor
6.9	Ineos FL 2.7	At these loading/ unloading places where people, other than the driver and the FL operator may pass, fence off the loading area with banks/ barriers or clear signs.
6.10	Ineos FL 2.9	Clear indication of route/ traffic flow by means of signs, road markings
6.11	Ineos FL 2.10	Clear indication of parking places trucks
6.12	Ineos FL 2.11	Clear indication parking places Forklifts
6.13	Ineos FL 2.12	FL's may only be parked in designated Parking zones. The engine key must be removed during parking.
6.14	Ineos FL 2.13	During night, gas powered FL's may not be parked inside the warehouses unless these are properly ventilated
6.15	Ineos FL 2.14	Clear indication of loading/ unloading area's
6.17	Ineos FL 2.17	Avoid the need for trucks to reverse. If necessary allow reversing only with the aid of a banks man
6.18	Ineos FL 2.18	A system must be in place to keep the number of trucks on site to an absolute minimum to avoid congestion and to limit the number of drivers in the loading/ unloading area's
6.19	Ineos FL 2.19	Adequate lighting must be in place

6.20	5.1.9	There must be adequate emergency lighting
6.21	Ineos FL 2.21	Supporting beams, light poles etc.. in the warehouse which are in the driveway of the Forklifts must be properly protected from collisions and must be painted in High Visibility colours
6.22	5.1.19	The warehouse must be equipped with mirrors in areas without good views.
6.23	Ineos FL 2.23	FL drivers to sound the horn when coming at blind corners/ intersections or through gates
6.24	Ineos FL 2.24	It is recommended to install rotating beacons at the warehouse gates which are activated automatically when a FL is approaching the gate
6.25	Ineos FL 2.25	Install clear pictograms indicating: emergency exits, doorways, forklift traffic, location fire alarm, location fire fighting equipment etc...
6.26	Ineos FL 2.26	Indicate the location of Fire extinguishers and hydrants clearly by painting the nearest vertical steel beam red or by means of clear pictograms at the warehouse ceiling
6.27	Ineos FL 2.28	Always drive backwards with a loaded pallet (except for 'high seaters' or when there is enough visibility: e.g. small size load) Never drive in forward direction if there is no adequate visibility in front
6.28	Ineos FL 2.29	The National Road Traffic Regulations should apply on site
6.29	Ineos	If repair or maintenance work has to be done in area's where forklifts circulate, this has to be reported to the supervisor who then has to inform the forklift drivers about the presence of the technicians (where and when repairs will take place). The work zone must be a 'safe zone ' and it must therefore be clearly marked out before commencing the repair.
6.30	Ineos Traffic 3.3.1	At these locations where it is practically possible, keep routes for trucks away from warehouse doors and gates. If this is not possible, clear warning signs must be in place. As a minimum, a convex mirror must be installed (install low enough to allow ease of viewing but high enough to allow load carrying without being hit). It is recommended to keep 2 meter of space between the traffic lane and the warehouse gate and to install a barrier to protect Forklifts from collisions with pedestrians/ cyclists or trucks when leaving the warehouse. When necessary, take into account that warehouse doors need to be closed
6.31	Ineos Traffic 3.4.1	Signs should be clear and unambiguous for both drivers and pedestrians
6.32	Ineos Traffic 3.4.2	It is recommended that stock locations where pallets are being placed /removed, are indicated by means of cones.
6.33	8.1.6	Gas bottles used for forklifts must be safely stored
7: Forklifts		
7.1	Ineos	Diesel powered fork lift trucks are not recommended for use in the warehouses.
7.2	Ineos FL 4.1	At the beginning of each day, the FL operator must do a proper check of the FL which must include the following checks:

		<ul style="list-style-type: none"> ○ Hydraulic leaks ○ Horn ○ Battery covered ○ Fuel connections covered ○ No sparks come out of exhaust system ○ No signs of overheated engine ○ Tires free of damage and at proper pressure ○ Windows clean ○ Do all controls work smoothly ○ Condition of Forks Ok ○ Lights OK ○ Is steering responsive ○ Do brakes stop smoothly and reliably ○ Parking brake is effective ○ Seat belts working ○ Load capacity plate readable ○ Condition of electric cables
7.3	Ineos FL 4.4	Before lifting a load, FL operators must always check the weight and the permitted weight of the FL in order to avoid overloading. This is of particular importance if none-routine tasks have to be done like loading/ unloading trucks with catalyst containers
7.4	Ineos FL 4.5	Seat belts must be worn at all times even when FL's are fitted with doors
7.5	Ineos FL 4.6	Seat belt checks must be done
		8: PPE
8.1	Ineos FL 4.7	Minimum PPE for all people in the warehouses and loading area's: Safety shoes, HIVIS jackets, hard hat, safety glasses
8.2	Ineos FL 4.8	Minimum PPE for FL operators <u>when sitting in the FL</u> : Safety Shoes, HIVIS jacket or HIVIS stripes on working clothes, normal working clothes with long trousers, safety glasses.
8.3	Ineos FL 4.9	It is recommended FL operators to wear special safety glasses with bended side glasses in order to allow better side view than standard goggles
8.4	Ineos	Safety knives with retractable blades, should be avoided as far as possible. If there is no alternative, cut resistant gloves should be worn. The preferred safety knife for logistics operations is the swan-neck type
		9: Loading packed goods
9.1	Ineos FL 4.3	<p>Truck drivers must receive clear safety instructions at the entrance of the site which must contain as a minimum:</p> <ul style="list-style-type: none"> • The minimum PPE required on site • The route to take on site • The requirement to use the available stairs/platforms to work at height • What the drivers are expected to do during loading including the Forklift segregation principles • The requirement to secure the load after loading <p>This can be achieved by means of a document, pictograms, video, VISOPs etc....</p>

9.2	Ineos FL 4.2	For all loading and unloading activities, proper procedures must be in place which are practical and well understood. These procedures can be under the form of VISOP's
9.3	Ineos	There must be a procedure in place to ensure that the maximum gross vehicle weight is never exceeded.
9.4	Ineos	Procedures must be in place for checking cargo securing (spot checks)
9.5	Ineos	There are clear truck or container loading/ unloading instructions regarding weather conditions (high wind speeds)
9.6	Ineos	There is a pre-loading checklist for trucks/ containers which includes cargo securing equipment, condition of the loading floor, general condition of the truck etc...
9.7	Ineos	The standard load securing document with the new load securing requirements is given to the driver prior to loading
9.8	Ineos	The driver indicates on a loading diagram how he wants the pallets to be placed in order to avoid axle overloading, and he signs for it
9.9	Ineos	All operational personnel involved in stowage and cargo securing, has been trained in appropriate technologies for securing of packaged goods
9.10	Ineos FL 4.10	Side loading is preferred to back loading. If back loading is unavoidable the following must be met:
	4.10.1	▪ Proper inspection of the trailer floor deck and roof structure
	4.10.2	▪ Proper securing of mobile ramp to the vehicle (chains at both sides)
	4.10.3	▪ Preferred: fixed ramps with wheel blocking system
	4.10.4	▪ Place wheel chocks or use vehicle / trailer restraint systems to clamp the wheels and to physically remove the drive away hazard
	4.10.5	▪ Ramps must have painted edges or bull rails to prevent FL's wheels from slipping off the side ▪ If vehicle to be loaded is not coupled to a tractor: use fixed trailer jack (or A-frame) to prevent upending during loading.
	4.10.6	▪ Driving with the load uphill side
9.11	Ineos FL 4.11	Before loading/ unloading it must be checked that the pallets are in good condition
9.12	Ineos FL 4.12	The preparation of the trailer for loading must be done BEFORE the loading starts
9.13	Ineos FL 4.13	A forklift/ truck driver segregation system must be in place. The driver stays in his cabin during loading. He is only allowed to leave his cabin when he has to remove stanchion poles or open curtains, and only when requested by the FL driver. FL drivers must have clear instructions to stop the loading/ unloading activities if the driver leaves his cabin.
9.14	Ineos FL 4.14	Truck drivers must use proper fall protection systems when working at height (e.g. for load securing). Mobile safety stairs must be available in all loading area's Operators must check for adherence
9.15	Ineos FL 4.15	The canvas of curtain siders must be properly secured to avoid that it is caught by the wind during loading. The FL operator may not come near the truck unless this has been completed. A procedure

		for actions to take, in case of high wind speeds, must be in place.
9.16	Ineos FL 4.16	The Securing of the load must be done by the driver AFTER completion of the loading
9.17	Ineos FL 4.17	Doors of trailers and containers may never be closed using the forks of the FL
9.18	Ineos FL 4.18	FL's with telescopic masts should not be used when loading containers/ trucks from the back
9.19	Ineos FL 4.19	Diesel powered FL's should not be used when loading containers
9.20	Ineos Packed T 8.5	When containers are loaded/unloaded, the doors must be properly secured in open position to avoid that they are caught by a gust wind.
9.21	Ineos	The area in front of the mobile ramp must be properly fenced off (e.g. by means of cones) to prevent people from entering this zone
		10: Access into the warehouse
10.1	Ineos Traffic 3.11.1	It is important that the drivers receive clear instructions where they have to load and where they have to report themselves. A system must be in place to avoid that drivers enter the warehouses or other restricted area's without permit.
10.2	Ineos Traffic 3.11.2	Where possible, forklift drivers should be informed (e.g. by radio) each time someone will enter the warehouse (technicians, visitors etc..).
		11: Near Miss reporting
11.1	Ineos	A Near Miss reporting system must be in place.
11.2	Ineos	Each time a forklift hits an object, this must be reported as an incident or a near miss
		12: Handling practices of Food(contact) and Feed Products
12.1	Ineos	Warehouses can have unique pest problems. In situations where large doors are constantly opening or remaining open for periods of time, it is very easy for birds to enter: Therefore, measures must be taken to keep birds away: Examples: Bird netting, bird spikes, hang a visual scare like terror eyes in front of doorways, install sonic devices etc...
	Ineos	See also Ineos O&P COP for sensitive applications
		13: stock control
		Physical stock control (both quality and quantity) to be carried out at regular intervals