

TAV-67: Information for the tendering process
English compilation of Site Safety Procedure FVV 1.4
Work Executed by Contractors

Date : 07/02/2014

Rev. : 1

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1. SUBJECT

Work executed by contractors

2. AIM

Establishing responsibilities and measures to be taken when work is carried out by Contractors, ensuring the organisation of the contractor yard, the safety and health of personnel and the safe operation of the site installations.

3. Definitions and responsibilities

Contractor: all companies and persons carrying out activities commissioned by INEOS NV., who are not part of INEOS NV., and have the disposal of a legal permit for providing contractor services.

Contractor personnel:

All personnel present within the fences of the plant, working by order of the Contractor; this also includes all personnel of the Subcontractor for whom the Contractor is responsible.

INEOS Executant:

Representative of INEOS, who orders or calls out the contractor work and follows it up.

Contract: for all work to be carried out by Contractors, a valid contract exists; this can be:

- One-off contracts: the Contractor is contracted for a particular, well described work
- Fixed term contracts: the Contractor is contracted for the duration of one or more years, to carry out a series of similar jobs, which will be clearly described at the moment of call-in.

Contract manager:

Representative of INEOS, appointed per fixed term contract to ensure the appropriate working thereof

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Operations: representative of the INEOS department where the contractor work takes place (yard)

Supervisor: representative of the Contractor, who is authorised to act on behalf of the Contractor, who is permanently present on the yard and who supervises the contractor work on the yard

Project safety plan:

an analysis of the work in order to evaluate the potential SHE-risks associated with the work, and the description of the measures to be taken to eliminate these risks or to reduce them to an acceptable level.

Safety management system:

a recognised management system to guarantee the health and safety of the employees and to protect the environment, in this case VCA (safety checklist for Contractors).

4. PROCEDURE

4.1 Contracting of Contractors

- 4.1.1 For every work that is contracted out to Contractors an INEOS Executant is appointed. For each fixed term contract also a Contract Manager is appointed.
- 4.1.2 The Purchasing Department ensures that this Site Safety Procedure FVV1.4, together with Site Safety Procedure FVV 4.1 "General Health, Safety and Environmental Regulations", do form an integral part of the tendering and of the final contract with the Contractor. When determining which specific appendices are applicable, the purchasing department will consult the INEOS Executant and/or the Contract Manager.
- 4.1.3 A clause in the contract will oblige the Contractor to fully comply with this FVV 1.4 and its appendices, and will specify that infringements hereof can lead to immediate termination of the contract, followed by any relevant claim for damages

4.2 Access to the site

- 4.2.1 The Contractor timely (at least 1 day in advance) requests the INEOS Executant, or in the case of fixed term contracts, the Contract Manager

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for an access badge for his personnel or visitors. An access badge is valid for maximum one year. This request shall be made by means of a standard form.

- 4.2.2. The Contractor will announce every person who is coming to work on the INEOS site within the terms of the contract, and will carry full responsibility for the correctness of the given data. In case subcontractors are used, the Contractor will also announce all persons working for the subcontractors and guarantee that the data, given for these persons, are correct.

In case of control by the Authorities, the Contractor will, on simple request, show the documents proving the correctness of the given data. Given the importance of these data, the Contractor will not delegate the announcement; this will always be carried out or be supervised by a responsible employee of the Contractor's organisation.

- 4.2.3. Every person presenting himself at INEOS will show:

- * his identity card or passport
- * a valid and duly signed formula E101 if he is not a Belgian citizen or if he is self-employed living abroad; in all other cases the SIS-card
- * proof of registration in Limosa (www.limosabe.be) if he does not have a Belgian employer or if he is self-employed abroad
- * the adjudication of his registration number if he is self-employed, established in Belgium.

When presenting himself at Gate South, he hands over a copy of these documents. The person will always have his documents with him on site.

- 4.2.4. Contractors only get access to the site provided they have a valid access pass. This pass is issued when the general safety training course "General Safety and Environment" has been completed and passed successfully. This is a 15 minutes video, available in Dutch, French, German and English, followed by a short test. Those who fail the test will not get an access badge.

- 4.2.5. The general safety training course must be refreshed annually, together with the extension of the expiration date of the access badge. The Contractor will request the INEOS Executant of the Contract Manager in due time for the extension of the expiration date of the access badge.

- 4.2.6. The INEOS Executant, or in the case of fixed term contracts, the Contract Manager will prior to the commencement of the contract:

- organise a Safety Meeting with the Contractor

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- check whether the Supervisor has a copy of FVV 1.4 and its attachments, and whether he has understood everything
- check whether every employee of the Contractor has been given information and instructions by the Supervisor regarding this FVV 1.4 and its attachments

The INEOS Executant, or in the case of fixed term contracts, the Contract Manager will properly document this by making use of the appropriate reporting form.

- 4.2.7. Normal working hours last from 7.45 a.m. till 16.15 p.m. on the normal 5 working days. Overtime is only allowed after formal permission of the INEOS-Executant.

Employees of the Contractor:

- Only enter the site through gate south where private cars of the Contractor's personnel can be parked
- It is strictly forbidden to leave the INEOS site by other ways than the indicated exits
- Vehicles, trucks and such-like enter through the North Gate

Visitors

- Visitors present themselves at gate south and are accompanied with an INEOS-representative or the yard Supervisor.
- If they stay more than one day, they have to be instructed about the safety rules by means of the generic safety training 'Basic Safety and Environmental rules'.

4.3. General Health, Safety and Environmental Regulations

- 4.3.1. The general regulations relating to health, safety and environment are contained in FVV 4.1 "General Health, Safety and Environmental Regulations", and form an integral part of the current procedure FVV 1.4.
- 4.3.2. The Contractor's yard supervisor, managing the Contractor's activities on site, ensures that these activities are carried out according to:
- Welzijnswet dd 4/08/96 (Belgian law on well-being)
 - General regulations for labour security (ARAB) and codex
 - General regulations for electrical installations (AREI)
 - All specific prescriptions and safety instructions required by INEOS (see 4.1.2.)
 - The Flemish environmental regulations (Vlarem)
 - The rules of good craftsmanship

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The yard supervisor ensures that all Contractor's personnel knows, understands and applies the safety instructions and the additional prescriptions, as advised during the safety meeting (see par. 4.6.3).

4.3.3. The Contractor provides inclusion in the yard dossier or the project safety plan:

- A list containing name, function, date of birth, nationality and language of all personnel employable on the yard
- Acquirements' register regarding hazardous tasks
- The required training certificates

4.3.4. At least one person in each team, working in each other's proximity or field of view, will have knowledge of the language of each person of the team and at least one person will have knowledge of Dutch, English, French or German.

4.3.5. All machinery and tools, used on the yard, have to be labelled with the necessary instruction cards. A list of all extant engines and tools, together with the periodical inspection and commissioning reports, has to be kept in the yard dossier or to be enclosed in the project safety plan.

4.3.6. The Contractor has to submit an application with the INEOS Executant or contract manager for the introduction of any products or chemicals on the INEOS site, together with their material safety data- and product sheets. Only upon the formal approval by the SHE-department, these products can be used; The Contractor keeps this list and sheets in the yard dossier or with the project safety plan. All packages have the right labelling.

4.3.7. Contractors or yard supervisors will take action to protect confidential information, handed over by INEOS in a reasonable way.

Personnel of Contractors, not respecting the safety regulations and instructions of INEOS, risk to be expelled from the site immediately. Safety regulations and other instructions are considered to be a contractual agreement.

4.3.8. Traffic

Vehicles always stay on the paved or asphalted roads.

Never block fire fighting equipment, exits or roads.

All vehicles entering the INEOS site have to be in a good shape. A valid inspection certificate has to be in place and the exhaust system has to be

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in good condition. The entrance to the site can be refused for badly maintained vehicles.

Only vehicles required for the job, are allowed on site.

Private cars of Contractor personnel have to be left on parking south, outside of the plant.

All vehicles allowed within the fences of INEOS, park on own risk on a designated parking space. INEOS is not responsible for any damage.

Collisions have to be reported immediately to the INEOS Executant, who will inform the safety department

Deviations because of obstructions or digging work, have to be followed strictly.

When the driver leaves his vehicle, he turns of the motor and puts on the hand-brake. Ignition keys have to be left on the contact in order to move the vehicle in case of an emergency.

4.3.9 Housekeeping

Clear away materials and tools after use. Don't let leave about spare parts e.g. bolts, gaskets... Tidy up leaks originated during work. Take out nails from boards.

Waste has to be collected in the appropriate holder unless the contract gives specific guidelines (see FV 5 the removal of waste).

Leaking and defect equipment

The employee who notices defect equipment (e.g. ladders, rails, cables, stairs ...), dangerous situations or the absence of protecting equipment, reports this immediately to his direct supervisor or INEOS-responsible.

4.4. Incidents and Work-related Accidents

- 4.4.1. The prevention of work-related accidents, the provision of first aid, the investigation and reporting of accidents is the responsibility of the yard Supervisor.

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4.4.2. When a work-related accident occurs, the yard Supervisor will always call in the assistance of INEOS, in the following way:

- The victim can move himself: he should go immediately to the First Aid post
- The victim is unable to move: assistance shall be called-in by means of an emergency call point or by dialling the internal number 555

4.4.3. The Supervisor will in the event of any incident or accident immediately inform the INEOS Executant, and will participate in the investigation, intended to prevent such incidents or accidents in the future. Where possible and required, the victim and the Contractor's Safety Coordinator will participate in the investigation team.

4.5. Fire and Emergency

4.5.1. Fire

Whoever notices a fire shall give fire-alarm via an emergency call point or via the 555 emergency number.

As long as you do not endanger yourself, you can try to fight the incipient fire with the available fire-fighting equipment until the fire brigade arrives.

The fire squad's intervention leader has the right to charge Contractors with:

- Moving of vehicles, goods or installations
- Helping to extinguish the fire
- Evacuating wounded people
- Impeding other employees to enter the site

4.5.2. State of Emergency

State of Emergency is every condition which can turn into a real danger for persons or equipment making it necessary to evacuate people.

The evacuation areas are located in the 4 corners of the plant. Observe the wind direction in order to avoid running into a gas cloud in case of a product leak. The mean evacuation area is parking SOUTH.
The evacuation alarm is given by an undulating siren.

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4.6. Operations with an increased risk

- 4.6.1. For all work that could entail an increased risk, and in any case for work that is subject to a work permit, following additional requirements apply.
- 4.6.2. The Contractor will conduct the required risk analyses for all jobs to be done. These risk analyses and the resulting prevention measures that need to be taken, have to be discussed with the INEOS Executant before starting the work. A list of all jobs and risk analyses is available with the yard dossier or part of the project safety plan.
- 4.6.3. Safety meeting
 - 4.6.3.1. One-off contracts: before the Contractor can start the work, the INEOS Executant will hold a Safety Meeting together with the Supervisor, a selection of his employees and INEOS Operation.
 - 4.6.3.2. Fixed term contracts: before starting the execution of the work stipulated in the contract, the Contract Manager will hold a Safety Meeting together with the Supervisor, the Safety Coordinator of the Contractor and its permanent team of employees.
 - 4.6.3.3. The aim of the Safety Meeting is to inform everyone in an adequate manner about the potential hazards relating to safety, health and environment and the risks for the operation of company installations that are specifically linked to the operation on hand.
 - 4.6.3.4. When defined in the Purchase Order, the Supervisor will present and explain the Project Safety Plan. For fixed term contracts, the Supervisor will submit a copy of the file of the Safety Management System and keep it available to the company. This file, called the Yard dossier, will be controlled bi-monthly by INEOS. This control is part of the safety quotation for Contractors.
 - 4.6.3.5. During the Safety Meeting, the INEOS Executant, or in the case of fixed term contracts the Contract Manager, will use the dedicated form (checklist) for documentation.
 - 4.6.3.6. In case the supervisor is replaced, another Safety Meeting will be held.
 - 4.6.3.7. For fixed term contracts the Safety Meeting should be repeated at yearly intervals, and should be initiated by the Contract Manager.

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4.6.3.8. The supervisor will transmit specific instructions to all the contractor's personnel who did not attend the safety meeting and participate in the operations on the INEOS site. He will document this in his yard dossier or project safety plan.

4.6.4. Work permits

4.6.4.1. Certain jobs entail an increased risk (either due to the nature of the work that needs to be carried out, or due to the location where the job is situated), and may only be carried out provided there is a valid Work Permit. This is the case for almost every job in operational areas.

Apart of this Work Permit system, special requirements/procedures exist for a number of activities, of which a non-exhaustive list is shown hereafter.

These requirements/procedures may impose additional administration, precautions or safety equipment. The applicability of these procedures will be part of pre-task risk analyses.

- Entry of confined space
- Excavation works
- Use of high pressure cleaning and vacuum trucks
- Building and use of scaffolding
- Asbestos removal
- Lifting operations
- Use of self-contained breathing apparatus
- Removal of grating
- Installing gaskets in Ethylene Oxide service
- Work at heights
- Installation of leak clamps
- ...

4.6.4.2. The INEOS Executant initiates the request for these Work Permits. The Supervisor will therefore consult on a daily basis with the INEOS Executant on which operations will be carried out the following day(s); he will hereby provide the INEOS Executant in with the necessary information and assistance a timely manner.

4.6.4.3. Each day, prior to the start of operations, the Work Permit must be collected by the Supervisor. This procedure normally takes 15 to 30 minutes.

4.6.4.4. The manner in which this is done is described in detail in FVV 4.2. 'Work Permits'