

PRAYON GROUP SAFETY AND SECURITY PROCEDURE

Safety rules applying to hauliers on the Engis, Puurs, Les Roches and Bex sites

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1. Scope

This policy applies to hauliers and drivers on the Prayon sites at Engis, Puurs and Les Roches.

2. Guidelines for drivers

2.1. General principles

- Drivers must comply with the general safety guidelines set out in this document. They are also required to abide by any specific instructions issued to them at the site entrance or at the weigh bridge by Prayon operators as well as those appearing on signs at the loading/unloading station.
- **Smoking is not allowed**, including in vehicles. The only exception to this rule is the designated smoking areas.
- Carrying or consuming alcoholic beverages (zero tolerance) or narcotic substances is absolutely not allowed anywhere on site.
- Photographs can only be taken with the written consent and in the presence of a Prayon officer.
- Drivers must be **proficient in the local language of the site OR able to communicate in English/French/Dutch/German using a limited number of phrases.**
- In areas where flammable products are present (ATEX zones), no equipment that could be a heat source or could cause sparking is allowed. N.B.: This ban also applies to mobile phones and smartwatches.
- When transporting dangerous goods, drivers must comply with the requirements of the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) and in particular see to it that markings (signs and additional markings) are applied to the vehicle, tank and/or container. They must also have with them the mandatory equipment required by **the ADR**.
- There must be no foul play (theft, violence, damage, sabotage, spying, break-in, or terrorism). Any suspicious behaviour must be reported to a Prayon employee.

2.2. The Life Saving Rules

The “Life Saving Rules” are fundamental safety rules aimed at preventing serious and fatal accidents. Compliance with the rules below is mandatory for all drivers and carriers operating on PRAYON sites:

- Working at height: wearing a safety harness
- Never stand under a suspended load
- Wearing a seat belt in all vehicles (driver and passengers)

2.3. Access guidelines

- Drivers must show at least the following documents when arriving on site:
 - photographic identification;
 - a driving licence;
 - a transport document;
 - loading/unloading details.

As the case may be, they must also show, if requested in the order and/or if required:

- a certificate of conformity for the product;
- an ADR permit, approval certificate, and safety instructions in the respective driver's language¹;
- cleaning certificate for the tank.

2.4. Guidelines on the car parks outside the plant and in the areas for drivers

- Drivers must keep the facilities provided for their use (toilets, drinks machines, etc.) clean and in good condition.
- Special permission is required to park for a period exceeding the time it takes to perform the relevant operations and administrative formalities.
- Parking is only permitted in the designated areas, namely waiting areas specially provided for this purpose.
- Tanks containing ADR products must never be uncoupled in the car park provided for waiting purposes at the site entrance. Prayon's consent is required before uncoupling or unhitching other tanks and trailers.
- Passengers are not allowed, unless an exemption has been granted and this is shown in a document signed by the head of the haulage firm involved. The same applies to animals.
- Drivers are not allowed to take breaks or spend the night on the site.

2.5. Traffic rules

- The highway code applies across the site, except in particular locations where signs indicate specific stricter rules.
- Wearing a seat belt is mandatory (Life Saving Rule)
- Drivers must not exceed the maximum speed allowed.
- **N.B.:** Handling equipment (forklift trucks) operating on site will travel at lower speeds.

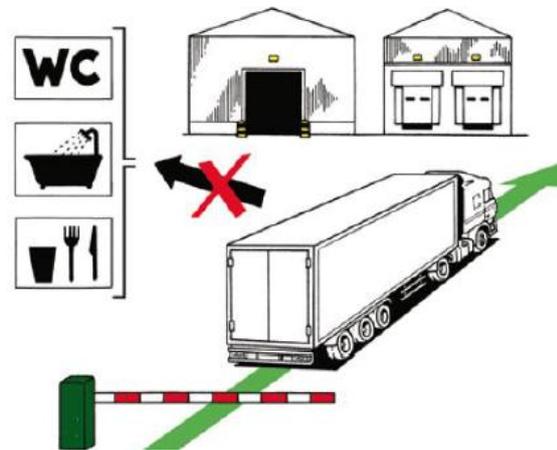
¹ Documents required for transporting dangerous goods (ADR)

- Rail traffic always has right of way. A flashing red light or barriers indicate(s) that it is not allowed to cross the tracks at that time. Stopping or parking on the tracks is not permitted.



- Drivers must not use phones when driving.

- Drivers must use the designated route, indicated by appropriate markings, when leaving and returning to the loading/unloading area.



- Haulage vehicles must not obstruct internal site traffic, and space must always be left for emergency vehicles (ambulances and fire trucks) to pass.
- Drivers must keep a safe distance from handling vehicles (for example bulldozers and forklift trucks).
- If required for a given truck movement, drivers must seek assistance from Prayon employees. Drivers and Prayon operators must have an unobstructed field of vision throughout these operations.
- When tanker vehicles move around, the valves and dome covers must be closed. This applies even when the tanks are empty.
- When tipper trucks or swinging dust silos move around, the tipper or swinging silo must be in the low position and the lifting cylinders must be locked.
- Before passing over the weigh bridge at the exit:
 - the tipper trucks must be covered with their tarpaulins;

- the domes of the tanks/silos must be closed.
- Curtain-sided trailers: Before moving, the rear doors must be closed, the curtains must be in place, and the tarpaulins must be properly secured. If the trailer is loaded, the clamping and securing rules must be followed.

2.6. Guidelines on personal protective equipment (PPE)

Drivers are required to follow the general instructions for personal protective equipment given below.

They must also abide by the specific rules applying on each site which will be communicated to them at the site entrance or by signs.

They must ensure they are wearing the **basic PPE** listed below before entering the loading/unloading area.



High-visibility jacket or fluorescent jacket (EN 471)

PPE is chosen based on the type of operation and goods involved and on the risk of contact/exposure using the table below.

Type of operation	PPE + standards
Loading/unloading of packaging, Big Bag pallets, etc. (classified or not for the ADR), of granular solids in bulk or	Basic equipment (see above) + - Protective gloves (mechanical hazards) (EN 388)

of other non-ADR-classified substances	
Additional PPE for ADR substances falling into Classes 2.3 and 6.1	<p>Basic equipment (see above) +</p> <ul style="list-style-type: none"> - Escape mask A2B2E2K2 (gas) and/or P3 (dust) available in the truck for all crew members - Protective gloves against chemicals (EN 374) or gloves suitable for the relevant substance
Additional PPE for ADR substances falling into Class 3	<p>Basic equipment (see above) +</p> <ul style="list-style-type: none"> - Protective clothing providing protection against heat and flame (EN ISO 14116:2015 [EN 533]) and antistatic protective clothing (EN 1149/5) - Antistatic safety shoes (at least S3)
Additional PPE for ADR substances falling into Class 8	<p>Basic equipment (see above) +</p> <ul style="list-style-type: none"> - Transparent face shield protection (EN 166:2001) - Chemical goggles EN 166 3 - Protective gloves against chemicals (EN 374) or gloves suitable for the relevant substance - Protective clothing providing protection against liquid chemicals (EN 14605:2009 with liquid-tight connections (Type 3) or spray-tight connections (Type 4))
Pressurised unloading of products that are not ADR products BUT are classified as corrosive or eye irritants under CLP	<p>Basic equipment (see above) +</p> <ul style="list-style-type: none"> - Chemical goggles EN 166 3
Additional PPE for bulk loading of food substances, to be put on before getting into the truck	<ul style="list-style-type: none"> - Drivers must tie back long hair and cover it with their overalls. - Drivers must not wear jewellery (watches, piercings, bracelets, etc.), except for smooth wedding rings.

2.7. Guidelines on loading and unloading

Before starting loading or unloading:

- Having parked their vehicle appropriately, drivers must turn off their engine and ensure that their vehicle is immobilised properly (handbrake and wheel chock).
- Drivers must show Prayon operators all the requested documents (weigh bridge voucher, delivery document, analysis certificate, washing document, transport document) and complete transport documents if required.
- Drivers must find out from the operator the locations of items required for first aid (shower, eyewash, etc.) and safety devices (emergency stop, fire extinguishers, etc.) and how to use them and safety measures to be taken in an emergency.
- Drivers are solely responsible for connections made to their vehicles and therefore must check the condition of any couplings or other connections. Faulty connections must be replaced.
- Whenever possible, unloading should be carried out using a Prayon hose.
- Site operators are solely responsible for operations using Prayon equipments (valves, pumps, etc.).
- Drivers must **always wait for official permission from a Prayon operator** before operating the vehicle's equipment, such as valves, compressors, pumps, etc. and before starting loading or unloading.
- Loading and unloading will be carried out under the operator's **personal** supervision. At the very least, a Prayon operator (specifically, the tank operator) must be present at the start and at the end of the relevant operation. He or she will check with the respective driver whether:
 - the transport tank is properly connected;
 - the driver has checked the seal numbers in the transport document if openings are sealed;
 - checks have been performed on the sealing of the couplings and the condition of the other connections.

At the start of loading/unloading:

- Drivers must stay in the area designed for this purpose and must monitor loading or unloading throughout.
- He must know the action that must be taken in case of an emergency and be ready to take action if there is a problem (for example with the hose).

- Drivers must never handle a coupling during loading or unloading; in case of a valve leaking, the operation must be stopped before any handling takes place.



- In case of loading, the driver checks to ensure the maximum permitted weight is not exceeded and takes all the relevant precautions to ensure that this is also the case for the maximum weight per axle.

At the end of loading/unloading (for liquid and dry bulk tanker trucks):

- Drivers must always ensure that there is no pressure in the tank and/or equipment before disconnecting.
- If necessary, they must drain the unloading hose and check to ensure there is no more of the substance inside; the drained substance must not be discharged into the sewers.
- If the pressure in the tank has to be removed before leaving the site, drivers must seek permission from a Prayon operator.
- Before leaving the loading/unloading station, drivers must inspect their vehicles and check the following items:
 - the full load has been transferred;
 - the hoses are disconnected and the pipes are emptied, drained, closed and properly stored;
 - manholes/valves are closed and locked;
 - seals are in place if requested (for transporting food products);
 - the earth/ground cable has been stowed away;
 - any other equipment has been released and/or removed;
 - the outside of the tank is clean;
 - the twist locks on the containers and tanks have been properly activated;
 - ADR signs are correctly positioned.

- When a tank containing an ADR product returns uncleaned, the driver must amend the transport document prepared for transport: the quantity must be crossed out and replaced by "RETURN EMPTY, UNCLEANED".
- Tanks and their equipment must not be blown with compressed air on Prayon sites.

At the end of loading/unloading (for tarpaulin-covered trucks and containers):

Before leaving the loading/unloading station, drivers must inspect their vehicles and check the following items:

- clamping and securing has been applied as required by the relevant rules and regulations²;
- seals are in place (if requested for transporting food products).

2.8. Guidelines for working at height

- To access the dome of the tank, drivers are required to use the collective protection devices provided at the loading/unloading stations and only move around on the platform supplied in order to access the place where they will carry out their work.
- Drivers must put on a personal safety harness before climbing onto the tanks in locations where this is required by a safety sign at the loading/unloading stations. (Life-Saving Rule: wearing a harness in the absence of collective protection devices).
- No work on ladders is allowed unless the relevant ladder is being used as a means of access.
- Ladders and stools must be in perfect condition. Any damaged equipment must be removed immediately. The ladder's stability must be assured at both the top and the bottom to ensure it does not slip and fall over.
- Users must be able to go up and down ladders safely (in other words, with both hands free).

2.9. Guidelines on taking samples

- Drivers must not take samples themselves.

² The Belgian Road Haulage Act transposing Regulation (EC) No. 1071/2009 of the European Parliament and of the Council of 21 October 2009 establishing common rules concerning the conditions to be complied with to pursue the occupation of road transport operator and repealing Council Directive 96/26/EC, and transposing Regulation (EC) No. 1071/2009 of the European Parliament and of the Council of 21 October 2009 on common rules for access to the international road haulage market

- For samples of ADR substances, drivers must ensure that the sample is securely stored in the locked box of the truck's tractor, packaged and supplied with a label according to the legal requirements (i.e. UN Boxes).
- Samples must never be stored in the truck cab.

2.10. Instructions for loading foodstuffs (packages)

If the grouping of goods is unavoidable and the goods previously loaded belong to class 6.1, 6.2, 9 or have the UN number 2212, 2315, 2590, 3152 or 3245, the driver must inform the shipper and take the necessary measures prescribed by the ADR. Good to know:

- Separate the goods with a solid wall partition as high as the dangerous package(s).

Or

- Separate the goods with goods other than those mentioned above.

Or

- Separate the goods by a space of at least 80 cm.

If the driver is unable to comply with these rules, the load cannot be loaded.

- The driver must ensure that these rules are also observed for loads following Prayon's.

2.11. Guidelines on preventing pollution

- On these sites, no substances must be spilled on the ground and/or in the sewerage system.
- Tanks must not be cleaned, washed or swept on these sites, unless specific permission has been granted by Prayon employees.
- Waste must not be disposed of on the sites.
- Apart from ordinary waste, which may be deposited in the bins. Drivers may only dispose of waste in larger quantities and/or hazardous waste after this has been approved by Prayon employees.
- Drivers must have the pollution mitigation equipment set out in ADR.

2.12. Guidelines in case of accidents and emergencies

- In case of alert (a gas alert/Seveso incident/fire/evacuation), drivers must stop what they are doing and follow the instructions they received at the entrance and the evacuation or refuge/containment instructions issued by Prayon employees.
- In case of alert, access to and from the site will be temporarily blocked.
- In case of a leak, spill, accident, or dangerous situation during loading or unloading, drivers must stop this operation and immediately alert Prayon employees (control room or tank operator). The emergency numbers are given on signs at the unloading station.
- In case of personal injury (regardless of the nature of the accident) and if they come into contact with any chemical, drivers must alert the Prayon employee in charge or get somebody to alert this person. The Prayon employees will then take care of the injured driver.
- In case of an accident with material damage, drivers will alert the Prayon employee in charge so that he or she can draft an accident report. They will then complete the internal Prayon accident report form together.

3. Hoses for loading and unloading

The hoses for loading/unloading must meet the required specifications for the substance being transported. They must be inspected at least once a year by a competent person chosen by the carrier who is not the person using the hose or involved in its maintenance. This inspection will include a pressure test and will be documented by a monitoring sheet. They must only be repaired by the manufacturer or by a certified repairer. Any faulty, cracked or damaged hose must be discarded immediately.

4. Training and competencies

The haulier must be familiar with and abide by the following legislation:

- the Convention on the Contract for the International Carriage of Goods by Road (CMR);
- the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR);
- directives and regional/national occupational safety and health (OSH) legislation (for example the Code on Well-being at Work in Belgium and the Labour Code in France).

Drivers must have taken all the relevant training courses to comply with the legislation (in particular those relating to handling and transporting dangerous substances and those covering clamping and securing techniques) and must have been informed of the safety rules applying on the Prayon sites. The haulier must provide refresher training.

Drivers must be fully conversant with the vehicle's equipment (loading/unloading valves, volume of the tanks and capacity of the compartments, hoses, coupling, earthing/grounding systems, gauges, and safety devices such as shutoff valves).

Subcontracting is only allowed subject to the prior consent of Prayon's Logistics Department.

5. Incident/accident reports

The haulier must have put a procedure in place enabling drivers to report any incidents, accidents, or dangerous situations they have encountered. This procedure must include an appropriate analysis of the circumstances and enable preventive and corrective measures to be taken to avoid such situations. This information must be shared with Prayon.

For any serious accident involving a driver, a causal tree analysis must be carried out as soon as possible (ideally the working day following the accident). This applies to any serious accident involving either a Prayon employee or an employee of the haulage firm. To ensure that this analysis is as relevant as possible, Prayon will invite the haulier and the victim (if he or she can travel) to a meeting. The haulier may send to such a meeting any person with the authority to represent it in these circumstances.

6. Measures in case of non-compliance

In case of non-compliance with the safety regulations by the carrier or the driver, Prayon employees reserve the right to take all the necessary protective measures to ensure the safety and security of people and equipment and/or protect the environment. The haulier will bear the cost of any event resulting from non-compliance with the rules set out in this procedure.

Prayon reserves the right to temporarily or permanently refuse access to a site to a driver, a transport unit, and so on.

Any failure to comply with the Life Saving Rules (§2.1) may result in the immediate stop of the activity and removal from the site, including withdrawal of site access temporarily or permanently in the event of repeated offences.