



**SAFELY PRODUCING SAFE
PRODUCTS**

**KNOW WHAT IS EXPECTED OF YOU
AND WHY!**



This guideline on rules of conduct for working in a safe and environmentally-aware manner applies for all Avebe locations for both Avebe employees and visitors to Avebe locations.



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Why a guideline on safety at work?

At the Avebe locations we produce starch, starch derivatives, proteins, fibers and other related products. That means working with hazardous substances and with operational processes involving heavy machinery, pressurised pipelines, chemicals, dust formation, noise and various transport movements each and every day. Put simply: various dangers are inherent to our work. We as Avebe personnel and visitors to Avebe locations play a leading role in all of this: it is possible for us to make mistakes that lead to incidents, but also to rectify them and – preferably – to prevent them. What can we all do to limit risks? A great deal! We explain precisely what in this guideline.

And what is expected of our employees if an incident none the less takes place? To take the correct action, we need unambiguous instructions and emergency procedures. Our work areas are large, there are a lot of people around and our production processes are too varied to gain a clear overview. That too is a reason for publishing this guideline. Our aim is to gain and retain clarity about Avebe's existing range of safety measures.

But it's not enough to know that rules of conduct exist. Our shared aim is to operate them. We do this as individuals, and above all together. By giving each other the space to learn to operate them, but also by confronting each other on correct compliance with the rules of conduct. We ensure a healthy work setting, a safe production process and safe products through our awareness of food and general safety and the environment.

In short, this guideline was written for everyone working at the Avebe sites!

Know the rules and work safely. Not only for yourself but also for everyone around you!

The Board of Directors

July 2022



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Chapter 1 About working in a safe and environmentally-aware manner

We at Avebe set out to work in a safe and environmentally aware manner for various reasons. First and foremost, we want all people - from employees, companies that make use of our locations, and contractors to visitors present at our sites - to be safe in the broadest sense of the word. That concerns both safe working conditions and a socially safe working environment. It is not only safety helmets, warning signs and emergency procedures that help to promote safety. How we work together also has an effect, e.g. on the alertness and concentration of our employees. Both are important aspects of safety at work.

But our responsibility goes beyond that. We also want to work safely because we have neighbours, we work with many parties outside the gate (e.g. potato and other transporters, packers, etc.) and because customers use our products. Everyone is expected to take account of our contacts outside of our gates when carrying out their own work. And let us not forget our shared responsibility for how we treat the environment in our work. Avebe wants to work as much as possible in balance with the world around us. That is what forms the basis for a permanent healthy and safe living environment for us all.

Safety and environmental awareness at work are possible only if we make clear agreements with each other. This also includes various rules of conduct arising from obligations under certain laws and regulations that Avebe must comply with. We should pay constant attention to keeping abreast of these agreements and rules and complying with them. In this guideline we have set out the most important matters that affect us all and which apply to our locations in the Netherlands. We focus primarily on safety and, where relevant, related priorities such as the environment, food safety, hygiene and quality.

1.1 What can you do as an employee?

We at Avebe know what we can do about safety and environmental awareness at work. There are a lot of agreements on this subject in circulation. They are put down on paper and on the intranet and are incorporated in procedures and work instructions.

We should take steps to ensure that everyone knows and applies the rules, procedures and instruments and that we confront each other when they are not applied correctly. Everyone contributes to safety! In chapter 2 you can read about the potential dangers at Avebe. What you can do yourself in concrete terms is described in chapter 3, in which we take you step by step through the production process. What we expect of you if an incident takes place during your work or in your working environment is set out in chapter 4.

In the rest of this chapter we discuss the general aspects of working relationships and general principles for (Food) safety and environmental awareness at Avebe. This is also given in the form of do's and don'ts.



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1.2. We find it normal that...

The internal Avebe Code of Conduct sets out our standards and values and contains rules of conduct relating to the subject of integrity. We would like to highlight a number of general and specific matters concerning product and general safety, health and the environment covered by that Code:

- Avebe sets out to conduct its business and secure the company's continuity in a profitable and socially responsible manner;
- Avebe sets out to deliver the desired quality in a consistent and controlled manner;
- Avebe undertakes to limit damage, nuisance and hindrance to its own personnel, third-parties and the environment wherever possible and necessary;
- we set out to achieve a safe working environment and to protect the health and welfare of our employees and other stakeholders;
- we expect our employees to contribute to a good working atmosphere in terms of their attitude and conduct;
- we limit health and safety (including food safety) risks as much as possible at the source;
- safety, health, food safety, welfare and the environment are the responsibility of each individual employee; Employees must be aware of this, take initiatives and cooperate; we promote awareness of the need for safe action among our employees through regular training and refresher training;
- care for the environment is integrated within our normal operations and is approached systematically;
- we ask personnel to identify and report unsafe situations, near accidents and damage to their immediate supervisor or safety expert or directly in Primecase and to jointly formulate corresponding improvement proposals;
- we act in conformity with public standards of decency;
- we work in accordance with the relevant laws and governmental regulations.

1.3. Standard do's and don'ts

We at Avebe operate several standard do's and don'ts that apply to all. We have a shared obligation to act in compliance with these rules and expect everyone to take them seriously. But we should also consider it normal for us to confront each other about these rules, on unsafe behaviour.



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Do's:

- comply with instructions given on signs;
- always follow the instructions of the company emergency organization;
- eat only in the areas designated for that purpose;
- switch off mobile communication equipment in indicated areas;
- special hazard markings or cordoning off are used where special activities are taken place. Stay outside of these cordons;
- it is compulsory to hold on to the stair railing.



Assembly point



Reflective vest mandatory



Hearing protection mandatory



No smoking



No mobile phones



No photography

Don'ts:

- smoking is prohibited at all of our locations unless it is explicitly stated that smoking in a certain place is permitted. It is prohibited to smoke in vehicles;
- it is prohibited to take alcoholic drinks and drugs into our locations, to be in possession of them or to use them. We pursue an ADM (Alcohol Drugs and Medicines Policy) policy aimed at prevention and enforcement where necessary. At work we operate a zero tolerance policy to being under the influence of drugs and alcohol;
- the use of photographic, film, video and transmission equipment is prohibited other than with the written permission of the Site Director;
- photography with a mobile telephone is also prohibited;
- it is prohibited to take objects and food to the company to repair them (or have them repaired) or to offer them for sale;
- it is prohibited to operate factory equipment without permission to do so from the employee responsible for it;
- it is prohibited to bridge safeguards without authorization;
- it is prohibited to spend the night at an Avebe location. This is however permitted under strict conditions at the waiting area for high-risk substances at Foxhol.

Violation of the prohibitions can lead to expulsion from the Avebe site. See also chapter 6, under sanctions.



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Chapter 2 The risks inherent to our production process

Most codes of conduct regarding (food) safety and environmentally conscious working are directly related to our production process: making starch, starch derivatives, proteins and related products. In this chapter we consider the risks that can occur in the production process.

There are specific dangers to our people, sites, buildings, working environment and the food safety of our products that can be caused by errors or deficiencies in, for example, the prerequisite requirements, the production process, human actions or equipment. Consider dangers caused by:

- exposure to hazardous substances;
- the leakage of an environmentally-harmful substances;
- an explosion of gas vapour or dust;
- working with dangerous machinery/installations (danger of getting trapped, entering and working in confined spaces);
- end products that are contaminated with pathogenic bacteria as a result of poor hygiene or pests in the production process;
- the discharge of untreated wastewater.

2.1. Orange zones

Where do these risks mainly arise? Safety zones have been designated at Avebe. These zones are called Orange Zones and are indicated by orange lines, orange picket posts or by signs. The signs show the standard PPE (personal protection equipment) as a safety helmet, safety footwear and -glasses and additional instructions and prohibitions where relevant. There are cases in food zones where specific additional hygiene measures are stated, and hearing protection is made compulsory in noise areas, for example. Everyone entering an orange zone should comply with the instructions and prohibitions shown in the sign.









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There are also cases where it will not be immediately obvious why a helmet or goggles are needed in a specific area, but for the sake of simplicity and clarity orange zones are sometimes slightly bigger than what may first appear necessary.

There are a number of general rules of behaviour that apply at all Avebe locations, such as a smoking ban, a maximum speed of 20 kilometres an hour and a photography ban.

The figure below shows which rules apply in the orange zones:

					
		Safety shoes	Protective clothing (no shorts and short sleeves)	Safety glasses	Safety helmet
Minimal standard		EN ISO 20345 cat. S3		NEN-EN-ISO 16321-1	NEN-EN 397
Inside orange zone	Warehouse				
	Laboratories				
	Workshops				
	Depots				
	Storage areas				
	Factories				
	Factory roads				
	Loading- and unloading points				
	Pipeline routes				

Food zones

Food safety can be compromised when physical, chemical or microbiological contaminants (also called contaminations) end up in our food products. When consumed, these contaminations can lead to illness, death or damage to our customers or their consumers. We want to avoid that at all times. Moreover, a withdrawal of products from the market, in which contaminated raw materials from Avebe have been found, results in enormous financial damage, but also loss of image for our company, customers and our partners. Certain prerequisite requirements must be met in order to guarantee food safety in the production process and during storage and transport. An important requirement is that everyone must adhere to the hygiene and behavioral rules in force in the food zones.

Signs and other instructions indicate where the food safety zones are located, and which rules of hygiene and conduct apply. Everyone is obliged to comply with this and to report any non-conformities that could be detrimental to food safety.

As well as washing hands when entering a food zone, it is also important to wash your hands after going to the canteen or toilet and if your hands have become dirty from the work. It is only permitted to enter the department with clean work clothes. Wearing jewellery is also prohibited with the exception of a smooth wedding ring. Wearing a hairnet, completely over the ears and hair is mandatory.



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Clean footwear is also important. A brush track has therefore been installed at the entrance of most food production lines. Sometimes a shoe change is also mandatory, pay attention to the instructions!

The above hygiene measures just like pest control and the cleaning plan, form part of the basic conditions programme of each food factory.

Risk assessment (Safety and Health for workers)

We carried out Risk Assessments a few years ago. The hazardous workplaces at Avebe are therefore known. They include the stores for flammable and/or toxic chemicals, but also the production processes themselves. Everyone is alerted to the hazardous zones at the underneath signs:



This sign indicates a caustic substances hazard. All pipes and storage areas for chemicals must be labelled with information symbols indicating the hazard.

And explosion-hazardous areas are indicated with the following sign:



Gas explosion

A gas explosion can be caused if a combustible gas or liquid gets into a pipe or area and mixes with the oxygen present in the air. An ignition source – such as a spark from a motor – can cause an explosion.

Dust explosion

A dust explosion can occur if a large number of combustible dust particles spread into the air. A fire or explosion can be caused by a spark or other source of ignition. At Avebe we work with highly combustible products such as starch, starch derivatives and protein. The risks of a dust explosion increase where there are large quantities of dust in the area, such as on equipment and close to ignition sources, such as:

- the presence of hot surfaces;
- foreign materials in the process (sparks);
- static charges;
- armatures that are not dustproof;
- work in which heat is released.

The European ATEX directive

De ATEX stands for Atmosphères Explosives. This European directive sets requirements intended to improve the safety and health protection of people who work in a potentially explosive atmosphere.



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Working in hazardous areas

Always keep yourself informed of additional requirements and regulations concerning hazardous work areas. The employee responsible for the department is the designated contact person for this purpose.

Maps showing exactly where the hazardous zones are located are also available for each location.

There can of course also be risks present in other areas, e.g. as a result of individual work. These risks most of course be avoided as well.

2.2. Working with hazardous substances

Where are which hazardous substances found? The most important hazardous substances are set out for each location in the chart below:

Location	Hazardous substances	Flammable	Caustic	Toxic
Ter Apelkanaal, KPW	Sulphur dioxide			X
Ter Apelkanaal, Stadex	Acetic anhydride (AZA), POCl ₃	X		X
Ter Apelkanaal	OSA, ADA	X		X
Ter Apelkanaal, Stadex	Strong acids and bases, such as hydrochloric acid, sulphuric acid, caustic soda, nitric acid, liquid chlorine, etc.		X	
Foxhol	Propylene oxide	X		X
Foxhol	Monochloride acetic acid (MCA)		X	
Foxhol	Acetic anhydride (AZA)	X		X
Foxhol	Strong acids and bases, such as hydrochloric acid, sulphuric acid, caustic soda, liquid chlorine, etc.		X	
Gasselternijveen	Propaan (LPG forklift trucks)	X		
Gasselternijveen	Strong acids and bases, such as hydrochloric acid, sulphuric acid, peracetic acid, formic acid, caustic soda, liquid chlorine, etc.		X	
Innovation Center	Various, in smaller quantities	X	X	X

More information about the properties of these hazardous substances can be found:

- on the label;
- the safety data sheets (SDSs);
- the intranet for the characteristics and the chemical charts (Toxic);
- in the process manuals of the relevant departments.



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2.3. Food safety (HACCP) and other risks

As well as our applications in the Paper and Technical Industry, our starch and protein products are used by our customers in the Food Industry as raw materials and ingredients in numerous products that people use or eat on a daily basis. That includes dairy and meat products, snacks, sauces, and fat substitutes. These end-products are sold and consumed all over the world. Our customers and their consumers must be able to count on our products being safe to people's health. This is a responsible task but also a legal obligation.

The prerequisite requirements must be in order to guarantee food safety. In addition, every company in the food chain is obliged to have a HACCP system. This should determine the hazards in the food safety process and take adequate control measures to eliminate or minimize the hazards.

Risks that may arise with regard to food safety are:

- microbiological hazards, for example from pathogenic (pathogenic) bacteria;
- chemical hazards, for example from toxic substances or allergens that do not belong in our products;
- physical hazards, such as sharp glass, plastic, metal.

Control measures in production to eliminate the risks or reduce them to an acceptable Level are, for example:

- the final screening system;
- metal detection.

Other risks

What should you do if there is a sudden, dramatic change in the process conditions? Or if a foreign body, such as a loose bolt, gets into the process and places the production process under threat? Situations such as these can arise despite all the precautionary measures we take. They are hazardous situations that increase the chance of serious accidents occurring if a chain reaction takes place. That underlines the importance of acting in accordance with the agreed procedures.

Knowing what to do in cases such as these calls for knowledge of our safety management system, which forms part of the Avebe Integrated Management System (AIM). The process manual and the emergency plans form part of this. They contain descriptions of all of our measures intended to ensure that the damage and scope of the emergency are minimised. The manuals and emergency plans can be found on Avebe's intranet. Know the rules they contain and apply them to your work!

2.4. Preventing incidents and limiting possible consequences come first

We at Avebe do a great deal to prevent the risks described above. That is partly because we regard that as being important ourselves, but also because the government requires us to put preventative measures in place. Our Foxhol, Ter Apelkanaal and Stadex locations, for example, come under the Major Accidents (Risks) Decree (BRZO), a translation of the European SEVESO guideline. This implies that we must at least have a prevention policy for serious accidents and a safety management system.



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We are required to report all incidents involving a chemical substance covered by the BRZO legislation to the public authorities. And every year an inspection is carried out. For the Dutch locations this is done by the Inspectorate SZW, the Veiligheidsregio (Security Region) and the Wabo competent authority (Environment Service). This is how the government verifies that the risks to our personnel and neighbours are not excessive. But what else do we do at Avebe?

Elimination at the source

The measures we take are based first and foremost on preventing incidents by eliminating them at the source. Wherever possible we replace chemicals with less hazardous alternatives. We also try to manage the risks by means of technical measures. They include working with spark-free motors, the installation of safety valves and explosion hatches.

Organisational measures

We also take organizational measures in the form of work permits, holding work meetings and drawing up safety regulations. And if an incident does take place, we try to limit the effects on the basis of the instructions from the emergency plans and if necessary, we use emergency facilities such as fire extinguishers. The attention we pay to prevention is also found in the form of rules and procedures that are described in the safety management system.

Safety management system (SMS)

The purpose of our Safety Management System (SMS) is to ensure that your systems operate properly and safely. And that our people are skilled in dealing with hazardous substances and aware of the risks in their working environment. It is a cohesive system of concrete measures and procedures. In short, this centres on risk management. The SMS focuses on all parts of our work: from the design phase, construction, production to maintenance and implementation of changes.

Measurement and knowledge

We have all sorts of instruments available for our operational processes that we use to chart and measure the risks and manage safety. Some examples: checklists, tests, safety rules, process manuals, process safety measures, incident reports, etc.

Maintenance, control and inspections

We also maintain structural supervision of implementation and our performance. That includes issuing work permits for maintenance work, monitoring the progress of improvement activities arising from the safety studies and carrying out inspections and internal audits. We do the internal audits ourselves and the external audits are carried out by third-parties (the health & safety inspectorate, provincial authorities, regional fire brigade, etc.).

Work meetings, training and education

Who has to do what with regard to safety in general or specifically in the event of serious accidents and with which responsibility is clearly laid down in the Safety Management System. That includes effectively training and educating our personnel. But we also attach importance to always placing the subject of safety on the agenda of our work meetings.



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Chapter 3 Working at Avebe locations: what we expect of you

In this chapter we set out the most important safety rules that we use to prevent or limit risks. We do this on the basis of everyday practice. In other words, the process of a day's work at an Avebe location. Step by step - from arrival to departure - we indicate what the spearheads are: (food)safety, environment, hygiene, or quality.

Structure of chapter 3:

Arrival	→	On our sites	→	At work	→	Departure
- signing in/reporting - access passes - collecting and taking		- traffic rules - vehicles - loading and unloading		- reporting - permits - emergency facilities - property - use of areas - the production processes		- signing out - inspection
(3.1)		(3.2)		(3.3 + 3.4)		(3.5)

3.1. Arrival, parking and reporting

spearhead: security

Irrespective of the job or the capacity under which we go to Avebe, we generally arrive in a vehicle, which we can park or stall outside of the factory site. As employees of Avebe we are then able to enter the site using our own admission pass or the turnstile or the barrier. Visitors and third-parties are expected to sign in with security first.

We employees should sign in our own visitors at least 24 hours before the date of the visit.

New? Read the instructions in advance

When people arrive at Avebe for the first time, they are always given prior instruction. But employees may also go to a new Avebe location, where different arrangements apply. The form in which we give information about the rules of behavior at our locations and who is responsible for them differs according to the situation. Everyone is obliged to watch the entrance video and to pass the accompanying test.

Also:

- new employees: this guideline and if necessary, task-based instructions (via managerial staff)
- visitors: map and general instructions (via security);
- suppliers: this guideline (via security/purchase);
- persons who are not employed by Avebe, but who are going to work at our location: this guideline (via the Avebe purchase);
- site-users: this guideline (via Site Director).



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If you are a security officer, a contact person, client or manager for these new people, you should make sure that they have been given the required information prior to their arrival. And even more importantly, make sure that they have read and understood it.

The term of validity of the Gateway video is two years for company employees. The online safety film has a one-time term of validity.

Signing in contractors

The contractor ensures that the following details are issued to the client and the porter before the work is started:

- the names of the contractor's personnel;
- the locations where they will be working and can be reached;
- the method used to contact them;
- the name, address and telephone number of the contractor, can be contacted in cases of overtime;
- the name and contact number of the client or building supervisor;
- the contractor is responsible for informing his personnel about the current safety regulations and company rules.

Contractors' employees who come to work within the orange zones must have a VCA certificate or a European equivalent such as SCC, SPA or MASE. If there is no valid certificate, the signed approval from a safety expert or QESH manager is required.

The need for a VCA certificate outside the orange zone is depending on the type of work and is to the discretion of safety expert or QESH manager.

Advance registration of visitors

We register our guests with the porter on the day before the visit at the latest. That enables the security officers to make the necessary visitor passes during the nighttime. A short registration time is possible only in consultation with security

Preregistration of incoming and outgoing goods with customs formalities

These must be reported in advance to the logistics department. This department settles the shipment and customs documents and gives approval to unload, to load and to depart.

Preregistration of materials, machines, etc. for projects

The security officer must be informed in advance (name of recipient and unloading point) if materials, machines etc., are being delivered to the project location. Materials must as a rule be delivered during the day shift.

Admission pass for freight transport

The drivers are issued with a contractor pass for this purpose. They are given a day pass if the visit is incidental. Co-drivers and/or passengers are also given a day pass.

When they arrive at the gate, they must report to the duty security officer. The security officer issues them with the necessary passes and a location map with the rules of conduct.



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Admission pass for visitors

Our visitors first report to security and are given an admission pass by the porter when they enter the premises. The security officer may ask them to identify themselves with valid proof of identity issued by the government.

People under the age of 17 are granted admission only with the approval of the Site Board of Directors and if accompanied by an adult Avebe employee. All visitors can enter the site via the pedestrian turnstile once they have been given a pass.

Before entering the premises, visitors may be issued with a reflective jacket, which they are obliged to wear.

Admission pass for group visits, staff parties and receptions

Groups are admitted with a single pass only with the written approval of the Site Director. This admission pass is applied for in advance and is issued only to the stipulated contact person. The contact person is responsible for keeping a list of invitees. This list is kept by the porter until the invitees are signed out by the same contact person.

Procedure for the collection and delivery of goods

Companies that arrive at Avebe to collect or deliver goods are expected to apply the legally prescribed labels or signs to the vehicle prior to their arrival. When collecting and delivering goods suppliers are also required - where applicable - to demonstrate that they are in possession of personal protection equipment such as safety glasses, helmet and footwear, face or evacuation masks or hygienic garments and equipment that are mandatory for working with foodstuffs or in food zones.

When goods are being collected or delivered the logistics department will also ask for the following to be presented:

Standard	If required
<ul style="list-style-type: none">• Order number of the batch to be loaded• The vehicle registration number• Transport documents	<ul style="list-style-type: none">• ADR-professional qualification certificate• ADR inspection documents• Valid vehicle cleaning certificate (collection only)• Hygienic clothing and means for working with foodstuffs

If transporting hazardous substances, the transporter is obliged to cooperate with the completion of a checklist.

3.2. A tour sites

spearhead: safety

We are now inside the gates, but still outside on the Avebe site. Whether we are pedestrians, lorry drivers or cyclists, we are all required to act in accordance with Road Traffic Act that has been declared applicable on the business sites of Avebe. Avebe also operates the following specific rules of conduct:



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General traffic regulations

Avebe is subject to the provisions of the Road Traffic Act. The maximum speed limit at all of our locations is 20 km per hour. Keep to main roads wherever possible and never obstruct roads, fire hydrants or entrances or exits. In the event of a collision or damage being caused always inform security using alarm number **333** using a landline or a mobile telephone issued by Avebe. With your own mobile telephone call **0598 661333**. Always report your location and provide all relevant information!



Vehicles on our site

Private vehicles are not generally granted access to our locations. In exceptional cases you may be issued with a temporary permit to use your own vehicle on our sites. This permit is issued by the Site Director. Cars may only be parked in the indicated parking spaces. A maximum of 1 passenger is permitted.

For third parties, permission must also be requested from the Site Director. In general, permission is given for a maximum of 1 vehicle per company. If more than one vehicle needs to be on the site, the Site Director must be given the reasons for this.

If the vehicle is used to transport tools/materials on the site, the means of transport must be placed at a (contractor) parking space after unloading the tools/materials.

It is permitted to use bicycles at Avebe's locations, but at your own risk. Bicycles and motorcycles may only be placed in the stalls for that purpose.

The manager's permission is required to use Avebe company vehicles. For that purpose you must hold a valid driving license suitable for the type of vehicle in question. Avebe company motor vehicles for which no driving license is required may be used only if you hold the appropriate driving license (e.g. a forklift truck license).

For the use of company vehicles of companies for which no driving license is required the driver must hold a nationally recognized driving license for the type of vehicle in question. The owner is responsible for maintaining the condition of the vehicle and the driver is obliged to check the vehicle's condition before using it.

Loading and unloading guidelines

Lorries arriving to load or unload may only be parked at the specifically designated place for this at the location in question. The engine must be switched off after 15 minutes if the stationary vehicle has to wait. The hand brake must be applied and wheel blocks placed if required. The lights should be kept on if desirable.

Loading and unloading may only take place with the approval of the authorized Avebe personnel. The driver must remain in the vicinity of his vehicle during both loading and unloading. Wearing a reflective safety vest is mandatory. Also ensure that the vehicle is loaded safely.

Entering a truck higher than 2.5 meters should be done in a safe manner, preferably by



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means of a fixed staircase and landing. When this is not possible, a safety harness is mandatory. The standard handrail on a silo wagon, for example, is not sufficient.

Placing of semi-permanent buildings and containers

It is only permitted to place temporary buildings or containers with the written approval of the Site Director. In the event of this rule or the agreements with the Site Director not being kept, the Site Manager will be authorized to have the structure removed at the owner's expense without prior consultation.

3.3. At work *spearhead: safety, environment, hygiene and quality*

Once we have reached our destination at the location (the production unit, the office, the control room, the lab, etc.) we enter the building. Whoever we are and whatever we will be doing, there are a number of standard rules of conduct for each workplace that apply to everyone present at them. They are set out one by one below:

Procedure for mandatory signing in

If we wish to enter a location, factory or department, we have to sign in upon arrival. That is done at the location with the employee responsible for this. This employee will give instructions for your time at the relevant factory or department if you will be working there. There may be specific rules and regulations for aspects such as food safety or explosion hazard. You will receive mandatory instruction on that subject.

For some activities, a work permit first has to be issued by the relevant employee (see also below). You must not go to another part of the factory or another department outside of your indicated workplace without permission. Colleagues in the area may also question your presence or how you are doing your work. Is the work finished or is it time to leave? If so, sign out with the same person as when you arrived or his replacement (at shift work).

Are you leaving your own place of work? You are also required to report your departure to colleagues or managerial staff and to say where you will be going or staying.

Work permit procedures

A work permit is needed to carry out hazardous work or work involving third-parties or other departments. In certain cases this work permit can be supplemented with a Task Risk Analysis. This is the case for work involving a fire hazard in an ATEX zone, working in enclosed spaces, digging work, working on systems with chemicals and hoisting.

Inform yourself about and keep to the safety measured ticked in the work permit and any additional permits. The employee responsible at the receiving department will approve the work by signing the work permit (or permits) again each day, before the work is started. In some cases it is even necessary for several departments to sign a permit. Permits must always be kept at the place of work.



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In the case of hazardous work we take extra measures, which we also specify in the permit:









- a fire sentry is used for work involving a fire hazard. You must act in accordance with the fire sentry's instructions;
- when entering an enclosed space you should measure the quality of the atmosphere, after which a safety sentry or a manhole sentry will be deployed, and you must also follow his instructions;
- the opening of process systems is subject to separate rules, which are stated in the work permit.
- the area is fenced off during hoisting; never walk under a hoisted load.
- when working in food safety zones, additional rules apply to prevent contamination of the product or process.

The following applies to all activities: always apply the Last Minute Risk Analysis (LMRA)!

In the event of a fire or gas alarm, the work is discontinued, and all permits become null and void. All permits must be signed off again following the 'all clear' signal.

Use personal protection equipment and approved tools

Other personal protection equipment may be required depending on where you are:

Standard	Specific (= standard + ...)
 Safety footwear	 Respiratory protection equipment
 Head protection	 Safety gloves
 Eye protection	 Ear protection
 Protective clothing	 Face mask
	Equipment for working safely at heights (> 2.50 m)

NB: contact lenses do not provide any protection!

You will be given instruction on how to use this personal protection equipment. Report defects in this equipment to your manager or contact person and ask for replacement equipment. Do not use defective equipment: have it repaired or destroyed.

In accordance with the Working Conditions Act, we only use approved materials and tools.

Know the emergency facilities

Emergency facilities include emergency showers and baths, eye wash stations and fire extinguishing equipment. We have identified these resources with signs and stickers



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Familiarize yourself with the specific emergency facilities in your direct working environment.

They include:

- signal buttons for alarms;
- telephone (landline) in your direct vicinity;
- escape routes and emergency exits;
- assembly points;
- emergency showers, baths and eye wash stations;
- fire extinguishing facilities such as hydrants, extinguishing systems, fire extinguishers, fire reels.



Assembly point



Safety shower



Eye rinse



Fire hose

Working at heights (higher than 2.50 m)

Working at heights is exclusively permitted provided that sufficient measures against falling have been taken. In cases where a safe scaffold, rack, platform or work floor cannot or can only partly be constructed, safety nets or effective safety harnesses with a safety line must be used. It is prohibited to walk or crawl over pipes and construction beams without safety equipment. Of course, this type of work requires a work permit and/or a WIKA or TRA.

Working on systems

Make sure the equipment is secured with Lock Out Tag Out Try Out (LoToTo) before starting work.

Always wear a face shield, chemical resistant clothing and gloves when opening a flushed line.

Pay close attention to information and ownership

We operate a number of rules of thumb in this regard:

- machines and equipment are marked effectively and durably so that it is clear who they belong to;
 - do not leave personal property unattended and take valuables out of your coat before hanging it up;
 - close down your PC when you leave the workplace and tidy away documents wherever possible;
 - if possible, lock cupboards and drawers at your workplace, also during lunchtime and other breaks;
 - clear up your place of work (clean desk policy);
 - report damage or loss of both Avebe and personal property to the Security Department. if necessary, the police will be called in;
-
- in the event of an investigation being conducted into theft and or other deviations from the rules of conduct, Avebe can make use of hidden cameras. This will be done only in the last resort, and the executive board of the works council will be informed of the intention to take this action.



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Use of areas for personal care

Personal care areas are intended exclusively for employees of adjoining departments. Exceptions to this can be made in consultation with the manager of the relevant section. We expect users to keep the personal care areas hygienic (clean) and tidy at all times.

Use of Avebe company restaurants

The use of our company restaurants (canteens) is permitted for all persons working at an Avebe location and their guests or clients. This does however apply only on days on which you are at work. We expect all of those using these facilities to act in keeping with normal standards regarding clothing, order and neatness. It is not permitted to wear dirty industrial garments, boots or dirty work footwear.

Be a good colleague

This is not something that we consider so often, but how we interact also has an effect on safety at work. A work environment in which we as colleagues can count on each other and confront each other on the subject of acting safely forms a healthy breeding ground. It ensures that we can concentrate on our work rather than being distracted by personal relations. Both managers and employees contribute to a good working atmosphere.

3.4. The production process

spearhead: food and general safety, environment, hygiene and quality

We now move to a place where people work directly on the production process. Each part of the process has its own rules, instructions and procedures. They are laid down in paper versions of manuals and procedure folders, but also digitally on the intranet. Amendments are constantly recorded and communicated to relevant employees. We have set out some of the rules below because we regard them as being important to everyone.

Know the risks involved in certain activities

As we have already mentioned, the work we do at Avebe involves certain dangers. Some activities are more hazardous than others. We should be extra alert in the following cases, for instance:

- loading and unloading raw products or materials;
- starting up and shutting down equipment;
- modification of production processes or process conditions;
- system maintenance.

Pay attention to food safety and hygiene

Food zones are clearly indicated. Food and animal feed departments have their own rules, such as:

- wear clean industrial garments, change in the designated area and do not take industrial garments or footwear home with you;
- cover your head, ears and hair with a hairnet;
- always wear glasses with a carrying cord;
- with the exception of a smooth wedding ring, it is prohibited to wear jewellery and watches;



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- loose objects such as pens, tools or medicines must not be carried in breast or jacket pockets (on the outside of the clothing);
- wash your hands before entering these workplaces.

People suffering from diarrhoea, infections, open wounds, skin diseases or other contagious diseases (including bowel disorders) must always report this to the employee in charge in the area.

Immediately alert the manager if materials are lost or if contamination has entered into the process or the product or may do so.

Plasters on hands, arms and the head are permitted provided that they are issued by Avebe. These plasters must be fitted with a metal strip and are coloured blue. Where there is a risk of product contamination, the plasters must be protected with a glove.

Do not carry out any emergency repairs using rope, tape or wood. It is not permitted to use these materials or to use glass.

Take good care of the environment

We at Avebe set out to conduct our operations in a way that minimizes harm to the environment. We also want to be good neighbours for those around us. We do not only expect our employees to take this into account, we also ask our visitors, site users, suppliers and contractors to contribute. We make specific agreements on this subject.

There are also a number of standard rules in effect:

- we have separate storage containers for various types of waste. Dispose of your waste in accordance with the Location instructions.
- prevent or limit nuisance caused by noise, dust, vapor, gas or malodor.
- report irregularities immediately to your manager or contact person.

More information about our environmental measures at the locations is given in the site rules, procedures and instructions.

Work always in an orderly and tidy manner

Avoid creating obstacles and keep passages clear. Report damage to your direct manager or contact person. Do not leave tools lying around: keep them in a safe place. Clear up your own litter and make sure that your workplace is tidy and safe after working hours.

Report to your supervisor any materials or items for which you do not know the origin or sender and which you believe have been in an unattended (perhaps dirty) place for some time.



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3.5. Departure, signing out and searches

spearhead: security

So, work is over, and we start to make our way to the exit. Once they arrive at the gate, the visitors can insert their day passes in the opened flap of the turnstile or barrier. Permanent employees and visitors keep their passes until they leave the company or their secondment period ends and use them to open the turnstile or the barrier.

At the exit of the location or building, outgoing goods may be checked by inspecting the contents of bags and suitcases and the contents of cars and other vehicles.

A randomized system is used to select those subjects to searches.

We can look back on a safe day's work at Avebe!



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Chapter 4 What to do in the event of accidents and emergencies?

In this chapter we concentrate on the rules of conduct and procedures that are important if incidents occur. Incidents come in all shapes and sizes. They range from fire, accidents (and near-accidents) to other emergencies. We will start by explaining how we define an incident, after which we will take a look at the various measures.

An incident is an occurrence that has or could have directly adverse implications for safety, health, the environment, lead to serious damage or be detrimental to social acceptance.

Incidents are occurrences that have or could have led, for example, to:

- injury;
- damage to systems;
- environmental harm;
- nuisance;
- complaints;
- the escape of (hazardous) substances;
- product contamination in food.

All incidents concerning health, safety and environment are recorded in a central reporting system, called Primecase. Notification can be done by intranet or by an App. It is allowed to take pictures to support the notification, of course only for the internal use of Avebe.

Everyone is obliged to report incidents, unsafe activities and hazardous situations!

4.1. The difference between minor, major and serious accidents

It is not possible to give standard definitions for these concepts; each incident has to be judged on its merits. However, we can provide some general guidelines for the classification:

Minor accidents

At Avebe we describe minor accidents at the level of needing a plaster. Someone might cut himself on a burr that comes about during drilling work, for example. Or an employee trips over a concrete tile that hasn't been levelled off. In any event, there is no question of serious injury, danger or damage affecting these people or those in their surroundings, the operating processes or the environment. Although these incidents are of minor importance, they remain problematic for the people affected. Prevention therefore always remains better than cure!

Major accidents

Unfortunately, incidents can quickly become more serious. Major accidents are found in the area of serious injury affecting one or more people, damage to parts or a disruption of the production process. Accidents of this nature have various aspects: someone could suffer a serious injury, an accident could take place with vehicles outside on the ground, a fire breaks out, a scaffold collapses while maintenance is being carried out, there is a substance emission, etc.



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Serious accidents

In serious accidents the damage is more serious and the consequences are many times greater. The danger of a chain reaction increases as well. We call an especially serious accident an emergency or a disaster. Examples include:

- a fire or explosion at a factory or warehouse containing chemicals;
- a fire at another location but with the risk of transfer to an Avebe factory or warehouse;
- the escape of a flammable or toxic cloud of gas;
- a pipe rupture resulting in the leakage of toxic or flammable gases or liquids;
- accidents with personal consequences such as permanent injury or worse.

The effects of this type of disaster have an adverse effect on health, the quality of the environment through contamination of the soil, water or air, the quality and safety of our production process and our products.

Causes

What are accidents caused by? The causes are often found in various areas, and sometimes involve a combination of factors. They include:

- design errors;
- abnormal reactions in the production process (over- or underpressure, too low or too high temperature);
- incorrect operation or use of equipment;
- carelessness during work and maintenance;
- welding and grinding sparks;
- jolting or colliding against systems or pipes;
- vibrations;
- wear and ageing of materials, leading to leakages and fractures;
- an incident outside of the site, such as a fire in the vicinity;
- personal protection equipment that is ineffective or not (or no longer) usable.

4.2. Emergency procedures

Let's be realistic. We know it can happen. That despite all the precautionary measures, we can find ourselves confronted with fire or a serious accident... It is at times such as these that we need a system of emergency plans, procedures and facilities. We expect people to know how to use them. We need to know what to do in emergencies.

To be perfectly clear we have once again set out the various instruments for this below.

Evacuation map

This map shows where the fire extinguishers and escape routes are located.

Action plan

The company emergency organisation service has drawn up a summary of the departmental emergency plan for each building. Together with the maps, this provides information about a deployment of the company emergency organisation service.



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Company emergency organisation

At each location a number of people have been trained to carry out an emergency service task during evacuations and emergencies. In the company emergency organisation these people are called 'first responders'. They have been trained in (limited) fire and first aid tasks.

First-aiders and the company emergency organisation

These services provide assistance to the victims and combat the emergency.

Membership of these services

These services are generally manned by volunteers. However, all suitable employees (including you) are expected to be willing to play a role of some sort in the company emergency service.

Emergency response plan

Each Avebe location has a roadmap ready for emergencies: a company emergency plan. This is a more detailed version of the departmental emergency plan.

Disaster plan

The disaster plan comes into effect if serious accidents take place. It is coordinated by the government.

4.3. General instructions

Everyone is obliged to report accidents that take place on-site. Reassure the victims, do not move them unnecessarily and never leave them on their own. Injuries are initially treated by a first responder or first-aider. You should therefore wait until a first aider arrives and follow their instructions. Your primary responsibility is your own safety.

Study the emergency plan of your department in advance. Sound the alarm if an emergency situation arises and follow the instructions given in the departmental emergency plan. Always call the alarm number: **333** from a landline Avebe phone or a mobile telephone issued by Avebe. With your own mobile telephone call: **0598 661333**.



Your call will be answered by the porter of a location. State which location you are at, your name and describe the place, nature and scope of the incident, the number of victims and any other particulars. The security officer will report the information to the reporting party, who checks that it has been properly understood.

Depending on the Location situations and instructions, leave the system or machines you work with as safely behind you as possible:

- shut off the power;
- shut down machines;
- or use the emergency stop.



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What to do in case of fire?

Report the fire through the alarm number. If possible, try to put out a fire in its initial stages yourself using the fire extinguishers at the location. Do not open any systems for this purpose. The fire must always be reported immediately to the porter using the alarm number.

If necessary, alert others in your vicinity and receive the fire brigade and the Emergency Coordinator (Calco). Give them information about how the fire started, if known. Follow the instructions of the company emergency organisation service and the Emergency Coordinator.

What to do in evacuations?

Close doors and windows. Alert colleagues and third-parties who are still in the building. Evacuate the building via the indicated escape routes and check that there are no other people in the area being evacuated. Take yourself to safety. Also check rooms as you pass them. Never return to the danger zone!

At offices and some workplaces the evacuation will be led by members of the emergency response team. Depending on the wind direction, go to the assembly point or the place indicated at that time by the coordinator. The definitive assembly point will be announced once the roll call has been taken. Follow the instructions of the company emergency organisation service and the Emergency Coordinator. Never leave the location or assembly point without signing out.

4.4. Incidents involving chemicals, gas or dust emission

Whoever discovers a leakage of chemicals is obliged to report this using the emergency number **333**. First consider your own safety and that of the other personnel in your area. If there are victims, put them under the shower (or emergency shower). Try to stop the leak by shutting off the supply. Try to contain the liquid if possible. Cordon off the area around the leak with a ribbon. Chemical cards are present in the porter's lodge, near the installation, in the process manuals and are identified with an icon on all PCs and on the intranet (TOXIC). Do not place yourself or others in danger.

What to do in case of a gas emission?

Is the gas emission coming from inside? If so, open the doors and windows. See also the general instructions. Is the gas emission coming from outside? If so, stay indoors and close the doors and windows. Set the ventilation from inside to out and await further instructions from the company emergency organisation.

What to do in case of a dust emission?

Is the dust emission taking place indoors? If so, tackle the cause with due regard for your own safety. Also, alert other personnel members in the building and evacuate the room until the dust has settled. Close off the room if possible. Alert the security officer if serious dust emissions occur.

In case of a serious dust emission inside and outside call 333.



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What to do in specific incidents?

Other than the hazards described above, there are specific incidents that can occur, some of which we have listed below, including the accompanying guidelines:

No.	Incident category	Guideline
1	Audible or visual alarm in or on a building/system	Report to operator or security and follow the instructions
2	Water nuisance caused by flooding or underground leakage; possibly holes in the site	Report to security. If necessary, cordon off the area or alert other departments in consultation
3	Leakage in pipe bridge	Report to security. If possible, identify the medium and, if necessary, cordon off the location or other departments, or sound the alert in consultation
4	Perceivable incident in a system or building where no manager is present at that time	Report to security. Cordon off the danger zone if possible/necessary. Try to prevent imminent damage. Alert others to the danger.
5	Dangerous icicles	Report to security. Cordon off if necessary
6	Storm or water damage	Report to security
7	Damage or problems caused by third parties	Report to security
8	Dust or noise nuisance	Report to security

In addition to the management report to interested parties, incidents and dangerous situations must be reported in Primecase.

What to do after an evacuation?

Do not enter the building until the company emergency organisation has given the all clear. Supervise the entrances to the building. It may be necessary to fence off the entrance with red and white ribbon to prevent unauthorised persons from entering the building.

4.5. Other equipment and telephone numbers

Maps

Maps of the relevant locations are available at the security department and reception. On the intranet you will find maps of Foxhol, Innovation Center, Gasselternijveen, KPW Lüchow, KPW Dallmin, Stadex and Ter Apelkanaal.

Siren signals

Fire or gas alarms can be indicated by means of a siren: for example a slow whoop signal is used for building evacuations. Get informed which type of signals is used on site.



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Important telephone numbers

Description	All locations Nederland	KPW Duitsland	Stadex Zweden
Alarm number internal (Avebe landline or mobile phone)	333	0 -112	112
Alarm number external (landline or mobile phone)	0598-661333	112	112



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Chapter 5 Learning to working in a safe and environmentally-aware manner

What can you do yourself about safety at work? There is only one right answer to this: a great deal! Everyone working at Avebe shares responsibility for the safety of their own working environment and that of others, and for our production process and our products. We therefore expect you to keep yourself properly informed. That means not taking a 'wait and see' attitude. We sooner expect an active fundamental attitude. As well as the necessary instruction and training, we are counting in you using your own initiative!

That means that you should let your manager, contact person or client know if you are lacking information. And managerial staff: inform your people and place the subject on the agenda. But you should also indicate when the rules are not being complied with and raise that for discussion. Colleagues: refer each other to compliance with the rules of conduct. And employees: make sure that you take in the information available at your place of work and keep yourself informed of changes affecting your working environment. We expect you not only to know the latest rules and procedures, but also to act in accordance with them.

Work safely at our locations! That applies to us all!

5.1. Be aware of what you know and what you do

Safety at work starts with being aware of what you do yourself and what you must certainly not do. How do you stand? Do you know all there is to know about safety (and food safety) and working in an environmentally aware manner? Do you know the rules of conduct for your working environment? We have drawn up some rules of thumb to find out whether that is the case:

Know the dangers at your place of work

Practical example: your task is to replace a pipe in the chemicals complex. The hazards at the complex are not clearly indicated in the work permit. You take the crane to the workplace and accidentally collide with the sulphur dioxide pipe. This could result in a pipe fracture or – even worse – the release of a toxic gas cloud. Obviously, you will want to avoid situations such as these, which is why you need to know the risks inherent to your place of work. Are you aware of the hazards in your working environment?

Know the dangers involved in your own work

Practical example: you are welding, and the sparks are flying. Have you carefully checked what is around you? Is there a paper container nearby that could catch fire? Or, even worse, are there inflammable chemicals in the area that could immediately lead to a serious accident? Are you aware of the risks involved in your own work?



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Know the safety rules and procedures involved in your work

Practical example from a process manual: "If the system shuts down because the explosion safeguard is triggered, it must not be restarted until there really is a danger of explosion or that it was a false alarm." This is an important rule since failure to recognise the cause of a minor dust explosion could lead to more explosions further down the line. Do you know all of the safety rules and procedures for your work?

Know where you can find information about safety

Practical example: whilst carrying out a repair you drop a screwdriver and it lands in the starch. This not only places the production process under threat, but also the food safety of the end-product. Can you simply shut down the system? And can that be done without asking your manager first? Avebe has a quality system containing all of the regulations. You can view it on a computer. Do you know how to use this system? And do you know for which situations you first need to ask for permission to do something?

Know the risks involved in changes

Practical example: a strut is welded onto a reactor. In this case, it is of great importance that several people, including the safety expert, inspect this change. For a reactor that has contained propylene oxide, it is not sufficient to thoroughly flush out the reactor. The substances may have been drawn into the wall of the reactor and could gradually leach out again. If you start welding too soon, an explosion cannot be ruled out. The 'change control' system has been set up to prevent this type of accident, but also to rule out the food safety risks. Do you know which procedures you need to follow for changes?

Inform your co-workers, colleagues, contractors and visitors about safety

Practical example: a new colleague has joined the department and it is very busy. The instructions on safety and emergency plans have not yet been given. That will keep until tomorrow, you think... But what if a disaster happens that day? Do you give sufficient information and instructions on safety on time?

Always report dangerous situations and accidents (or near-accidents)!

Practical example: you discover corrosion on a pipe used for hazardous substances. This means that the material has weakened, which could result in major leakages. You should therefore report dangerous situations directly to your manager or directly via Primecase. That way we can avoid accidents in the future.

IF YOU NOTICE AN UNUSUAL SITUATION, CALL THE ALARM NUMBER: 333
Have you memorised this number?

5.2. Training and education

At Avebe we have a planning system for training courses in order to ensure that our permanent employees receive sufficient training in the area of safety (and food safety) and working in an environmentally aware manner. This planning schedule has a set frequency and includes repeat and refresher courses.



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Chapter 6 Not keeping to the rules of conduct means...

It will go without saying after reading all of these rules of conduct that we expect a lot of our employees. Keeping to these rules means more than being willing and able: it also means trusting each other. We need to be able to build on each other's strengths and not have to wonder if my safety counts as much as anyone else's. Unfortunately, this is not always a matter of course. There are times when people behave otherwise. There is no doubt that we have to confront those people.

To reiterate: non-compliance with the agreements in the form of rules of conduct and procedures can have implications for the production process, our product, the health of the people at and outside of our locations, the environment and – accordingly – the continued existence of Avebe. Know your own responsibility in this area and act accordingly. If you fail to do so, we at Avebe have the right to take action and impose sanctions. In this area, too, we aim for transparency.

Types of violations and sanctions

The types of violation we recognize are shown in the table below.

Traffic violations
Exceeding the indicated speed limit
Disregarding a parking prohibition
Driving in the wrong direction
No or insufficient lights at dusk or in poor weather conditions
Blocking of company emergency service vehicles or overhead fire hydrants
Blocking passages
Parking under pipe bridges
Ignoring road closure

Safety violations
Ignoring safety alarms
Failure to wear personal protection equipment
Being present on the factory site without reporting (electronically) at the gate
Being in the factory without following the procedures (signing in)
Carrying out work contrary to the work permit
Working without a work permit where one is required
Obstructing factory entrance, safety equipment, etc.
Violation of the smoking ban on the site, other than in designated smoking areas



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Other serious violations
Theft
Misuse of email or internet
Acting contrary to Avebe regulations
Causing an environmental incident (that must be reported to the public authorities) through gross negligence
Unauthorised engagement of electrical systems

Each violation has its own action and sanctions. Who is responsible for which action in the event of a violation depends on the type of violation? In the one case, this is the head of the department, in another it is the Site director.

We at Avebe operate various sanctions, which are indicated with the following letters:

- A = verbal warning (registered);
- B = written warning (with action where appropriate); for contractors: a letter to company;
- C = relieved of duties;
- D = suspension;
- E = dismissal.

Which sanction is applicable depends on several things: the type of offence, the seriousness, the context, whether there have been any previous violations, whether a single or more offences have been committed. This type of case also allows for a scaling up of sanctions.

The sanctions are laid down in Avebe Internal Regulation 35 "**Sanctions Procedure**".

Avebe employees can appeal against a sanction in conformity with Internal Regulation 31 "**Individual right of complaint**".

Violations not listed above, such as dumping waste, vandalism, physical violence, photography/filming, harassment (sexual or otherwise), are subject to similar sanctions.

