

**Guideline**

**Compliance policy regulations**

**Chemelot Site**

Version 120301

### 1. Determining the follow-up action as a result of an incident

Potential incidents of failure to comply with the regulations have been divided into categories. Chapter 5 shows a non-exhaustive table with examples + associated indication of the follow-up action.

The definitive follow-up action is determined with the aid of a FLOW CHART.

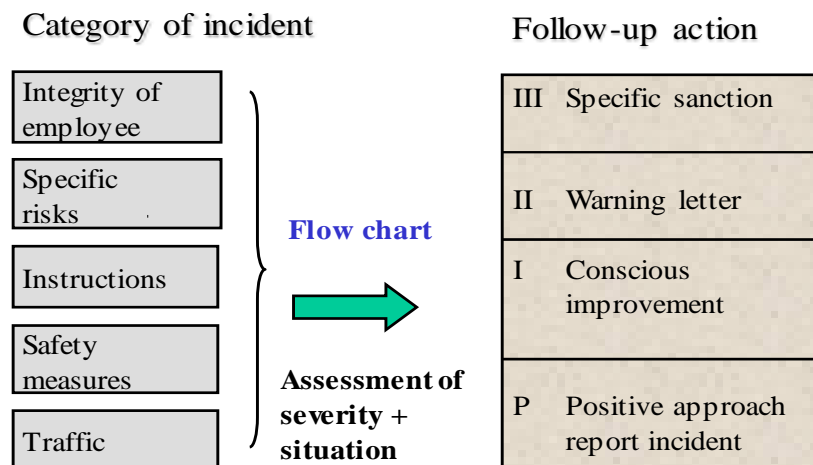
The assessment of the SEVERITY of the incident and the SITUATION with regard to the incident plays a critical role here. This assessment results in the follow-up action determined.

There is therefore no fixed sequence, for example first I, then II and finally III.

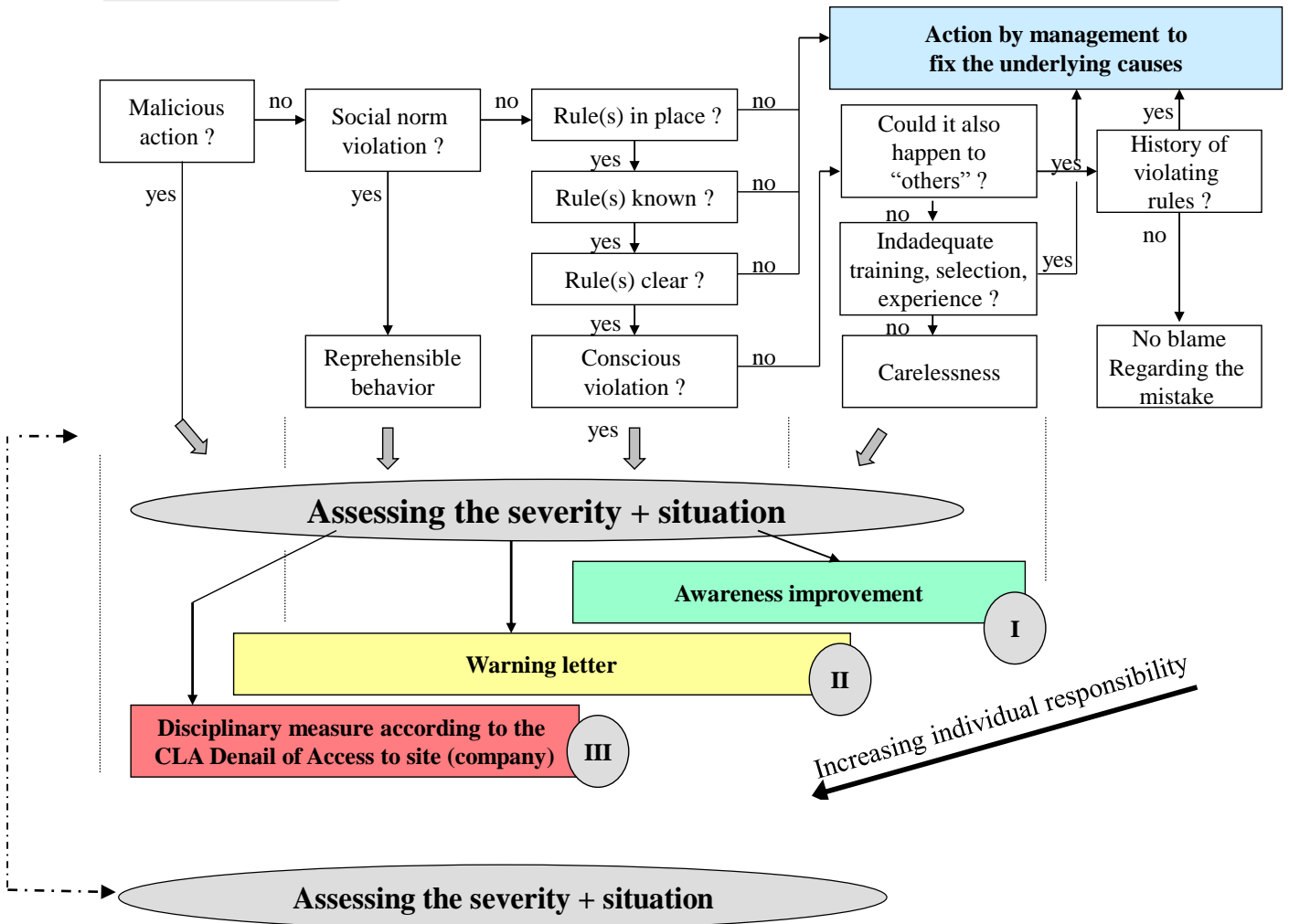
The follow-up action is determined at management team level (MT level).

The key components are given in the overviews/flow charts below.

### **Classification of incidents and follow-up actions**



## FLOW CHART



### Severity:

- Minor or major consequence
- Possible adverse effects for the person concerned and for others
- Limited or extensive risk
- Minor or major damage
- .....

### Situation:

- Unclear/clear instruction
- Positive/negative SHE attitude
- Special circumstances, including those of a personal nature
- Type of position (managerial or non-managerial)
- Repetition (one or more previous violations) \*
- .....

➡ Definitive determination follow-up action **I** , **II** or **III**

\* The follow-up action is increased (where possible to the category above) in the case of repetition within 6 months of a traffic breach and in the case of repeated violation with regard to alcohol and drugs.

## 2. Dealing with the incident

Classification	Follow-up action	Dealing with the site user employee	Dealing with the company employee
I	<b>Awareness improvement</b>	<b>Employee spoken to by his/her hierarchical manager (MT member)</b>	<b>Employee spoken to by MT member site user</b>
II	<b>Warning letter</b>	<b>Hierarchical manager (MT member) to draft, discuss and record the written warning</b>	<b>MT member site user to draft, discuss and record the written warning</b>
III	<b>Specific sanction</b>	<b>To be dealt with by the person responsible within the site user in accordance with disciplinary measures as set out in the CLA of the site user in question</b>	<b>Initiated by the Area Manager, a denial of access to the site or driving ban is imposed by way of a letter to Security - Park Services, signed by: OBL: Area Manager IBL: Area Manager + Owner or sponsor Security Oper. Brd</b>

The owner / sponsor Security Operational Board monitors the fairness and consistency of sanctions imposed (III) with regard to company employees and site user employees (unless responsibility for the monitoring of fairness and consistency is regulated differently for the site user).

In the event of an IBL/OBL incident involving an employee from another site user or service organization, the IBL/OBL Area Manager shall report the incident to this employee's relevant hierarchical manager.

In the event of an OBL incident involving a company employee, this will be handled by the OBL Area Manager irrespective of whether another client is involved.

Where an employee of a site user is given a warning letter (II) or a sanction (III) is imposed, the HRM manager concerned will also be involved in connection with personnel-related consequences (including conformity with the CLA).

In the event of a company employee being denied access to the site, the management of the company shall decide on the internal measures to be taken. The site user has no further part to play here.

### 3. Appeal

With regard to employees of site users, this will be handled in accordance with the regulations in the CLA and any internal regulations of the site user in question.

The management of companies can send a written appeal against a sanction imposed to the Security Operational Board of the owner. In such a case, the Security Operational Board of the owner + sponsor shall evaluate the complaint jointly. They will listen to the Area Manager and company employee involved. They will decide firstly on the basis of the arguments presented and secondly on the basis of the facts + circumstances whether the sanction imposed by the Area Manager involved should be revised.

### 4. Evaluations

Given the nature of the subject matter, it will not be possible to have a made-to-measure instruction for all conceivable incidents and situations in advance.

It is therefore important to evaluate the regulations in the compliance policy on an annual basis and to revise these where necessary.

## 5. Indicative follow-up actions

N.B: This relates to indications which can be deviated from in specific situations on the basis of the assessment of SEVERITY and SITUATION!!

P : Positive approach to reporting incident

I : Awareness improvement

II : Warning letter (recorded)

	Site User employee	Company employee
III : Specific sanction (examples)	- > Driving ban ≥ 1 month - > Suspension in accordance with CLA - > Dismissal from position in accordance with CLA (temporary/permanent)	Driving ban ≥ 1 month Site ban ≥ 1 month Permanent site ban

Examples	Indication →	P	I or II	III
<b>Integrity of employee</b> (character, attitude, conduct)				
• Burglary				X
• Theft				X
• Vandalism/sabotage				X
• Impolite behavior			X	
• Sexual harassment				X
• Violence abuse				X
• Improper use of company pass				X
• Improper use of parking pass				X
• Knowingly failing to stop after a collision				X
• Misuse of IT equipment				X
• Evading the sanction				X
<b>Specific risks</b>				
• Smoking in areas where this is prohibited				X
• Open fire where this is prohibited				X
• Use and possession of alcohol and drugs				X
• Driving while under the influence of alcohol and drugs				X
• Incident at height with (potentially) major consequential damage ( <i>height restrictors, pipe bridges, etc.</i> )				X
• Emergency stop of locomotive				X
• Ignoring safety screens in the event of an alarm				X
• Endangering oneself			X	
• Endangering others			X	
• Failure to comply with important ADR requirements ( <i>document fraud, exceeding inspection deadlines, uninspected tanks, state of maintenance with acute danger, including when transporting hazardous substances</i> )				X



Park Services.