

Instruction concerning observance of internal occupational safety and health, environmental protection and HACCP requirements, in force in Pfeifer & Langen Polska S.A. of 30.01.2018

Employee – each person carrying out works within the Pfeifer & Langen Polska S.A. facility on behalf of a Contractor/Supplier/Service Provider or on behalf of their subcontractor,, regardless of the type of the legal relationship between the Employee and the Contractor/Supplier/Service Provider.

Facility – each sugar factory/packing facility or another place within the sugar factory owned by Pfeifer & Langen Polska S.A.

Facility Coordinator – person/persons indicated by the Director/Head of the Sugar Factory

Product Zone – internal area of the factory in which we are dealing with sugar production equipment, starting from crystallization to the stored product. The Product Zone is also the sugar assortment, fondant and syrup production area.

Specification of fundamental requirements

I. Occupational safety and health

Facility area

1. Employees moving outside of the designated and marked routes must be equipped with a helmet and a high visibility vest.
2. Road traffic regulations and locally adopted rules for vehicle traffic, described with clear warning signs, are in force within the territory of the Facility.
3. Exclusively vehicles which meet minimum safety requirements specified in separate regulations, in good technical working order, may be used for transport in the road traffic within the Facility area.
4. All Employees performing services within the Facility are obliged to immediately notify their superior, the Facility Coordinator or another person from the Sugar Factory supervisory body about the accident at work or threat to human health and life. In justified cases emergency services should be called immediately (e.g.: if the injured person is unconscious, has serious injuries, has fallen from height, and other).

The place of incident/accident shall be secured by the Employee until all activities necessary to determine its reasons and circumstances have been carried out.

5. Entering the facility and moving around its territory should follow the rules described in the instruction **“Product protection and supervision of movement of persons”**, made available by the Facility Coordinator.

Area in which works are performed

1. The place in which Employees carry out work should be marked out and enclosed.
2. Tools and machines used for work must meet conformity assessment requirements or be adapted to meet minimum safety requirements.
3. Tools and machines used for work must be in good technical working order, and their condition should not result in an increased risk of accident during their use.

4. Technical auxiliary measures applied, such as scaffolding, equipment for temporary work at heights, must meet conformity assessment requirements and be handled exclusively by qualified personnel.
5. All duties with regard to the supervision of Employees must be carried out by a qualified representative of the Contractor/Supplier/Service Provider or their subcontractors.
6. During the performance of work, Employees must be equipped with work and protective clothing and footwear, as well as personal protection equipment intended for the performance of individual works. The above equipment must be in good technical working order and must be used as intended.
7. Employees must have current medical examinations admitting them to work in the specific job.
8. Employees must have current certificates confirming the completion of occupational safety and health training in the existing job.
9. Documents confirming that requirements contained in paragraphs 6 and 7 of this instruction have been met are presented by the Contractor/Supplier/Service Provider or their subcontractors to be viewed by the Facility Coordinator upon request. In the case of a refusal to present these documents, the Facility Coordinator may request the verification of these data to the National Labour Inspectorate.

II. HACCP

Employees carrying out work in the Product Zone should follow the instruction of **“Good hygienic and production practice”** which is made available by the Facility Coordinator, and in particular observe the following rules:

1. Employees sent to carry out work in the Product Zone are obliged to use clean company work clothes. In the absence of work clothes, Employees are obliged to put on a disposable apron.
2. Employees are obliged to wear a protective cap which covers hair fully. If a protective helmet is used, a cap covering hair fully must be worn underneath the helmet.
3. Persons with beards and moustaches are obliged to put on beard protectors/masks in order to prevent contamination of the product. These protections are required only in places where the product is dealt with directly (centrifuges, packing).
4. It is forbidden to carry glass objects into the Product Zone. Necessary personal items, such as spectacles, constitute an exception.
If it is necessary to use spectacles in the Product Zone, they must be protected against dropping or loss.
5. Each case of glass breaking/cracking must be immediately notified to the person supervising the work at that moment.
6. It is completely forbidden to bring and wear jewellery, including wedding bands, chains, earrings, rings, watches and other ornaments in the Product Zone. If it is impossible to remove the jewellery, e.g. wedding band, from the hand, a protective glove must be used.
7. It is forbidden to bring and eat meals and drink beverages in the Product Zone.
8. It is forbidden to bring into the Product Zone any personal belongings not related to work performed (bags, newspapers, etc.), electronic equipment – telephones, music players and receivers, photo cameras, video cameras, etc., food and beverages brought in, glass items or items made of brittle plastic and sharp items (knives, needles, pins, safety pins, etc.), as well as private medication in any form.
9. Smoking tobacco is forbidden in the entire territory of the factory with the exception of designated, marked places.
10. All tools used for work must be removed after the completion of work.
11. Employees are obliged to maintain cleanliness and order in the area where work is carried out and leave places where work is carried out as they found them.

III. ENVIRONMENTAL PROTECTION

An environmental management system compliant with requirements of the ISO 14001 standard have been implemented and certified in the P&L Group's facilities in Poland. Employees carrying out work within the Facility should meet the following environmental requirements, including:

1. Method of handling waste produced:

- Employees are obliged to remove by themselves all waste created as a result of their work within the Facility, at the expense of the Contractor/Supplier/Service Provider, unless the agreement stipulates otherwise.
- The Contractor/Supplier/Service Provider or their subcontractor is obliged to equip Employees with appropriate containers for collecting waste.
- If as a result of work carried out by the Contractor/Supplier/Service Provider a large quantity of waste is created, e.g. rubble, scrap, etc., the Facility Coordinator should indicate the place of temporary collection of waste, e.g. sectioned off area in the yard, to the Employees. Such place should be marked with the name of the Contractor/Supplier/Service Provider or their subcontractor.
- All waste should be removed on an ongoing basis.

2. Intake of water and discharge of effluent:

- Employees take water from deep wells for the purpose of work performed under the supervision of the Facility Coordinator who indicates the water intake points.
- Employees are not allowed to discharge any substances into the facility's sewage system, local water flows and facility reservoirs. All of the accidents occurring, connected with the contamination of waters should be immediately notified to the | Facility Coordinator or person responsible for environment protection in the given Facility.

3. Leaks of petroleum derivative substances:

- Employees are obliged to notify the Facility Coordinator about the necessity to use oils or lubricant substances during work. The Contractor/Supplier/Service Provider or their subcontractor should provide sorbents to remove possible leaks and containers to remove the used sorbent. The used sorbent constitutes hazardous waste.
- In the case of leaks of petroleum derivative substances, the **"Procedure in the event of petroleum derivative substance leakage"** which is provided by the Facility Coordinator.

4. Contamination of soil and water environment:

- The area where work is conducted should be secured against contaminants getting into soil and ground waters through the use of e.g. spillage containers, absorbent mats, tarpaulins, curtains protecting against the spread of contamination.

The Contractor/Supplier/Service Provider is obliged to get their Employees acquainted with the Environmental Protection Policy in force in the given Group's facility.

IV. Enforcement of regulations, rules and penalties

5. If the OSH / HACCP and environmental protection rules are broken, contractual penalties specified in agreements, general terms and conditions of agreements, arrangements concluded with Pfeifer & Langen Polska S.A. for the performance of specific works/services shall be applied.
6. In the event of the Employee's repeated transgressions, the Facility Coordinator or another authorised representative of Pfeifer & Langen Polska S.A. may apply for such person to be removed outside the premises of the facility.
7. In the case of the Employee grossly violating the principles specified in this instruction or other legal regulations generally in force in this respect, that Employee shall be immediately removed from the premises of the Facility, and a contractual penalty shall be imposed on the Contractor/Supplier/Service Provider.

Poznań, dated 30.01.2018