

Subject: Health, Safety, Security and Environmental (HSSE) Progress Report
Ref: DD-004
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Dear Customer,

Doedijns is committed to active environmental awareness and the occupational Health and Safety of its employees and the users of its products. We prove this commitment through our compliance with the European and national Health, Safety, Security and Environmental legislations.

With this letter we inform you about the current status of the organisation Doedijns b.v. and all its subsidiaries according to the (most) relevant Health, Safety and Environment related laws and standards in relation to our activities and products. All relevant laws and standards – but also the HSSE related requirements of our stakeholders – are registered centrally which is subject to regular reviews. Other legal requirements are less relevant or – based on the current information – not applicable to the activities or products of Doedijns.

Standards

The management system of Doedijns complies to the SCC (VCA) standard, the standard in the Netherlands to achieve occupational health and safety. To increase awareness and minimise our environmental footprint, Doedijns is certified to the worldwide environmental standard ISO14001.

National laws

Doedijns meets the requirements of the national laws for the protection of its employees (labor law) and the environment. If a subsidiary is visited by a governmental environment department, possible shortcomings are picked up accordingly.

European laws

European regulations are directly applicable to all countries in the European Community. In addition, the European directives are included in the national legislation. The current status in relation to several European laws is as follows:

Regulation 1257/2013 - amending Regulation (EC) No 1013/2006 and Directive 2009/16/EC - and IMO Guidelines Mepc 269.(68): Ship Recycling

Concerns onboard availability of the Inventory of Hazardous Materials (IHM). This regulation is not relevant to Doedijns directly while it's applicable to ship owners.

Directive 1999/92/EC: ATEX 153 Directive

This directive describes the minimum requirements to improve the safety and health protection for workers that are potentially at risk from explosive atmospheres. Doedijns has recently started or accomplished the following actions:

1. Incorporated the requirements of this directive into the management system of Doedijns.
2. Regular reviews of the – so called – Explosion Safety Document.

Directive 2006/42/EC: Machinery Directive

Directive with regard to the provision of safe (completed and uncompleted) machines, lifting equipment and safety components. Doedijns has recently started or accomplished the following actions:

1. Organising training and education for (new) personnel at the engineering departments.
2. All related documentation part of the Engineering department page on the intranet.

Directive 2014/68/EU: Pressure Equipment Directive (PED)

This directive sets out the standards for the design and fabrication of pressure equipment. Doedijns has recently started or accomplished the following action(s):

1. All related documentation part of the Engineering department page on the intranet.

Directive 2014/29/EU: Simple Pressure Vessels

The scope of this directive are vessels manufactured in series and subjected to an internal gauge pressure greater than 0.5 bar, made to contain air or nitrogen, and are not intended to be fired. Doedijns has recently started or accomplished the following action(s):

1. The requirements of this directive as part of the generic document regarding all relevant CE directives to adapt our management system to the requirements of the PED directive

Regulation 1907/2006: Registration, Evaluation, Authorization and restriction of Chemicals (REACH)

Based on the current information we are just a downstream user; therefore the products traded by Doedijns do not require registration according to the REACH regulation. To our information our products do not contain any substances of very high concern (SVHC) announced by ECHA effective up to the date of this letter. Doedijns has recently started or accomplished the following action(s):

1. Regularly evaluating the latest version of the Material Safety Data Sheets to ensure proper use of these products in our own facilities by taking the right measures. For example the storage of chemicals, the use of personal protection equipment by employees and availability of appropriate first aid resources.

When applicable we will start the following actions:

1. Take the necessary measures for our employees and inform our customers if SVHC's are present in the products, based on the information received from our suppliers.
2. Provide SVHC information relating to our products within 45 days upon request of any customer (often called "Green Passport", "Black&Grey lists" or Inventory of Hazardous Materials (IHM)).

Regulation 2011/65/EU (RoHS 2) - and delegated directive 2015/863 (RoHS 3): Restriction of Hazardous Substances

This regulation refers to electrical and electronic equipment ("EEE") - including lighting – and at first this regulation determined the maximum concentration values tolerated by weight in homogeneous materials of in total 10 substances: mercury, lead, cadmium, chromium-6, PBB, PBDE, DEHP, BBP, DPB and DIBP. All max. 0.1% with the exception of Cadmium (0.01%).

Based on the current information, this regulation is not applicable to the products of Doedijns. On request of any customer we will provide detailed information relating to our products. A standard form has been prepared for this.

Regulation (EU) 2016/679: General Data Protection Regulation (GDPR)

The General Data Protection Regulation is a regulation in EU law on data protection and privacy for all individuals within the European Union which repeals the directive 95/46/EC. Doedijns has recently started or accomplished the following actions:

1. Organising Progress meetings regularly.
2. Completion and implementation of internal work instructions regarding this regulation.
3. Updating the Data Processing register.

Directive 2008/98/EC: Waste Framework (WFD)

This new directive has been established to ensure all companies supplying the EU market with articles containing substances of very high concern (SVHCs) on the Candidate List in a concentration above 0.1% weight by weight (w/w), submit information on these articles. This directive is effective from 5 January 2021.

The information shall be reported to ECHA by means of the - so called - SCIP database. The aim of the database is to ensure that information on hazardous chemicals is available throughout the life of products and materials, even at the waste stage. The information in the database is then made available to waste operators and consumers.

Doedijns has recently started or accomplished the following actions:

1. The requirements of this directive to be part of a central register to implement this directive according to the national legal requirements.
2. Inform the purchase department to request our suppliers for a statement accordingly.

Other laws

The current status in relation to other laws is as follows:

Conflict Minerals

In Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 the Securities and Exchange Commission ("SEC") was directed to issue rules requiring certain companies to disclose their use of tantalum, tin, gold or tungsten - if those minerals are "necessary to the functionality or production of a product" - sourced from the Democratic Republic of the Congo ("DRC") or the surrounding countries (designated as "conflict minerals"). These rules were in response to concerns that the exploitation and trade of conflict minerals by armed groups is helping to finance conflict in this region of Africa and is contributing to an emergency humanitarian crisis. Although this is a United States based law it affects Doedijns' global supply chain, regardless of where suppliers might be located.

Based on the current information 'conflict minerals' are not used in the products of Doedijns. On request of any customer we will provide detailed information relating to our products. A standard form has been prepared for this.

Final

At this moment we are, in all conscience, in compliance with the applicable Health, Safety and Environmental legislations. We trust we've sufficiently informed you with this letter. If you have any further questions please do not hesitate to contact us. On request of any customer we will provide detailed information relating to our products.

Kind regards,

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