

Subject: Health, Safety, Security and Environmental (HSSE) Progress Report
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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. 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 international environmental standard ISO14001.

Dutch legislation

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

European legislation

European regulations are directly applicable to all countries in the European Community, the European directives are included in the national legislation. The current status in relation to several European laws is as follows (in order of reference number):

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

From December 31st, 2020 this regulation requires any EU-visiting ship above 500GT to have a certified and maintained IHM Part I (Inventory of Hazardous Materials in structure and equipment) onboard. The IHM-Guidelines of IMO (Res. MEPC 269(68)) apply to non-EU-flagged ships ("IMO-IHM") whereas for EU-flagged ships an "EU-IHM", covering two more substances, is required. The Port States of the EU are obliged to control and enforce this. This regulation is not relevant to Doedijns directly while it's applicable to ship owners. At the request of any customer a declaration is requested from the applicable supplier.

Regulation 1907/2006 - and Regulation 2020/878 amending Annex II - concerning Registration, Evaluation, Authorization and restriction of Chemicals (REACH)

Doedijns is a downstream user; therefore the products traded by Doedijns do not require registration according to the REACH regulation. The latest version of the Material Safety Data Sheets are evaluated regularly to ensure proper use of these products in our own facilities by taking the necessary measures for our employees, e.g. the storage of chemicals, the use of personal protection equipment and availability of appropriate first aid resources.

Suppliers are made aware of their obligations through revised purchasing conditions. If - based on the information received from our suppliers - a product contains substances of very high concern (SVHC's) according to the REACH Candidate List in a concentration above 0.1% weight by weight (w/w) and/or substances with restrictions according to REACH Annex XVII our customers are informed through additional text on the packing slip and the invoice.

If requested by any customer, SVHC information relating to our products will be provided within 45 days (similar to the 'Inventory of Hazardous Materials' (IHM) from the Ship Recycling Regulation).

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.

Through drafting and reviewing regularly of the – so called – Explosion Safety Document the requirements of this directive are incorporated into the management system of Doedijns.

Directive 2006/42/EC: Machinery Directive

Directive with regard to the provision of safe (completed and uncompleted) machines, lifting equipment and safety components.

All related documentation is part of the Engineering department page on the intranet to pursue compliance during the engineering phase. Training and education for (new) personnel at the engineering departments is organised.

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 (SVHC) 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 made the requirements of this directive part of a central register to implement this directive according to the national legal requirements. ECHA is informed about any products in which the concentration is exceeded, customers are informed through additional text on the packing slip and the invoice and suppliers are made aware of their obligations through revised purchasing conditions. If applicable, ECHA will be updated.

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%) as stated in Annex II of the RoHS Directive (unless using an exemption as those listed in Annex III and IV).

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

Directive 2012/19/EU: Waste Electrical and Electronic Equipment (WEEE)

During the collection, treatment and disposal of waste electrical and electronic equipment, products may release harmful (hazardous) substances such as lead, mercury and cadmium, which can cause major environmental and health problems. The WEEE Directive promotes the collection and recycling of such equipment. Doedijns only uses designated and reputable companies for this purpose.

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. 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.

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

This directive sets out the standards for the design and fabrication of pressure equipment. All related documentation is part of the Engineering department page on the intranet to pursue compliance during the engineering phase.

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 carried out Progress meetings regularly and recently started or accomplished the following actions:

1. Completion and implementation of internal work instructions regarding this regulation.
2. Updating the Data Processing register.

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.

TSCA Toxic Substances Control Act Reporting

Based on the version of the Toxic Substances Control Act (TSCA) as amended by Frank R. Lautenberg Chemical Safety for the 21st Century Act, the United States Environmental Protection Agency (EPA) took further measures against 5 persistent, bioaccumulative substances effective January 6, 2021 and toxic chemicals (PBT) and strict regulation of these chemicals in place. It deals with bans and restrictions on the manufacture (including import), processing and distribution of the following chemicals: PIP, DecaBDE, HCBd, PCTP and TTBP.

Based on the current information, this act is not applicable to the products of Doedijns. At the request of any customer we will provide detailed information relating to our products.

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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