
Product Stewardship Policy

1.0 Mission statement

Sustainability in all aspects of our business and being a leading, sustainable and reliable producer are important elements of OCI Nitrogen Europe's mission statement for which the Product Stewardship program is a valuable guideline.

2.0 Introduction

This Product Stewardship policy describes the OCI Nitrogen Europe Product Stewardship activities in alignment with the Fertilizer Europe Product Stewardship standards for fertilizers.

3.0 Scope

In the scope are all OCI Nitrogen Europe manufactured and distributed solid and liquid mineral fertilizers, their raw materials and intermediate products. It includes the whole life cycle of the OCI Nitrogen Europe Fertilizer products: Product Development, Materials sourcing, Manufacturing, Packaging, Transport, Storage, M&S and Product application & farmer services.

4.0 Objective

OCI Nitrogen Europe, through the Product Stewardship program strives to improve its safety, health and environmental (HSE) and security aspects associated with the production, storage, distribution and use of fertilizers. The Product Stewardship program is embedded in the company's HSE and Responsible Care program, in the security standards and risk management company processes. OCI Nitrogen Europe strives to act in close partnership with all partners in the value chain based on clear open communication.

5.0 Guiding Principles

5.1 Leadership and administration

OCI Nitrogen Europe management complies with the Fertilizer Europe requirements. Management of the HSE and security risks are an integral part of the daily activities. The relevant risks are regularly evaluated and if necessary mitigated actions are taken.

The Product Stewardship objectives are an integral part of the companies HSE, security, risk and responsible care processes.

These processes are fully integrated in the daily operations throughout the OCI Nitrogen Europe Fertilizer value chain. All employees involved are trained to secure the HSE, security, risk mitigating- and responsible care objectives. Communication on the Product Stewardship elements is secured through the HSE, security, risk and responsible care processes.

New Product Stewardship regulations are identified through involvement in the Fertilizer Europe working groups as well as through a quarterly request for input on identified legal requirement changes.

5.2 Product development

Industry HSE and product quality standards and legal requirements are fully integrated in case of product development secured through internal OCI Nitrogen Europe and OCI Fertilizer engineering experts, members of the OCI Nitrogen Europe and OCI Fertilizer manufacturing staff. All products are regularly tested against product requirements. When appropriate all required safety, quality and agronomic tests are carried out for new products prior to commercialization.

All products Safety Data Sheets are readily available to all relevant stakeholders. The Safety Data Sheets are available on the internet.

5.3 Sourcing of raw materials, additives and third party products

Suppliers are selected applying supplier selection criteria. In addition, supplier performance reviews are executed regularly for critical suppliers and occasionally for non-critical suppliers. In case a supplier does no longer meet the OCI standards, either an improvement program will be initiated or the supplier will be replaced.

All relevant HSE, security and product quality aspects and in-depth logistic specifications are shared with suppliers during the contract negotiations or in case the respective document has been changed intermediately.

Raw materials, additive, and chemicals suppliers are required to provide product safety data sheets as well as to go through acceptance test on new materials.

Third party products are purchased against supplier specifications, analyzed and checked during loading against internal specification.

The product data sheet PDS and Material Safety Data Sheet MSDS are obtained as required in the shipment process. ISPS code is applicable to all OCI marine and sea port operations.

5.4 Manufacturing

The manufacturing site operates in compliance with the EU Seveso II directive, occupational health standards and environmental permits. Relevant HSE risks have been identified.

Risk inventories have been made on manufacturing, storage and loading activities.

The 11 Fertilizer Europe safety management principles are an integral part of the OCI Nitrogen Europe operations HSE standards and practices. All relevant information on packaging, labeling, SD sheets and transport safety is available.

Regular product analyses secure ongoing compliance of the products against the requirement set.

Manufacturing contractors are thoroughly screened on their HSE performance, working permits are standard practice, as well as their performances are evaluated. Contractor HSE management and performance are regularly reviewed.

OCI Nitrogen Europe employees are trained on: HSE related issues, product handling, how to deal with spills and non-conform materials. The loading departments are trained on loading fertilizers. Contractors are checked on their readiness to handle the products correctly. Training needs are regularly evaluated as part of the HSE practices.

Emergency and crisis management plans have been developed and implemented, including market withdrawal procedures.

The emergency and crisis management procedures are shared with the relevant OCI Nitrogen Europe employees.

All relevant product documents are available as well as products are regularly analyzed against specifications. Of products tested samples are retained. Also, of all shipments book-keeping systems are available to track individual deliveries.

A Manufacturing security coordinator is nominated. The manufacturing site fences are regularly inspected for the detection of unauthorized access as part of the site security plan. Suspicious observations and theft is reported.

5.5 Packaging

All measures to assure the use of correct packaging and to secure statutory correct labeling are in place. The same goes for third parties executing packing and operating on behalf of OCI Nitrogen Europe.

As far as applicable the reuse, recycling, recovery and/or waste disposal of packing material has been determined, evaluated and communicated with customers and end users.

5.6 Transportation

OCI Nitrogen Europe has nominated a transport safety advisor. For all transport activities logistic specifications have been detailed, including all relevant HSE and security requirements, and are shared with all relevant logistic suppliers. Requirements and specifications on transport means are shared with the suppliers in the contracts and all vessels, trains and trucks are inspected directly before use by the vehicle driver. The logistic specifications, required to be applied by all logistic suppliers, cover all relevant HSE, security elements covering the Product Stewardship elements. Required emergency preparedness is agreed with the logistic suppliers. In case of any incident, including security events like theft or burglary, OCI Nitrogen Europe can be consulted via the 24/7 emergency number of the Chemelot Alert & Care Centre (+31 46 4765555) as indicated on the safety data sheets.

All logistic suppliers comply with the relevant regulations such as ADR and others. For all vessels adequate access controls are in place. ETA is timely shared as well as all relevant information between the logistic suppliers and OCI Nitrogen Europe and its customers.

5.7 Storage

Rental agreements for external storage includes an assessment of HSE requirements and performances. The logistic specification as agreed with the suppliers include all relevant HSE, security and risk management details. Safety data sheets are available on place and, where applicable, guidance of AN safety handling regularly checked with suppliers. Products present in external storage are identified, recorded and labeled statutory correct.

Storage and emergency plans are available, tested and trained with the suppliers where applicable. Incidents and accidents are reported to OCI Nitrogen Europe according written procedures. The 24/7 emergency phone number to reach OCI Nitrogen Europe is available on each individual accompanying and transport document as well as on the safety data sheet and can be used for both safety and security incidents.

Technical support technicians, familiar with all installations and suppliers assets, are available in case required.

5.8 Marketing and sales

Safety data sheets are made available on all products; OCI Nitrogen Europe products as well as Third Party Products. Regulatory changes are obtained through various channels, including regular requests to inform on relevant changes through our local offices and representatives.

OCI Nitrogen Europe provides advice on correct product application, safe handling, storage and transportation of the product. Upon request also information about handling of not-in-spec material is available.

Customer complaints as well as logistic and internal complaints are structurally managed with adequate feedback and if required underlying root cause analysis on recurring issues. Of all complaints records are maintained.

Emergency calls are dealt with according the crisis management procedure. In all cases the OCI Nitrogen Europe Crisis Team leader, the OCI Nitrogen Europe CEO, is informed, also already when only a potential crisis emerges.

All Marketing & Sales staff is properly trained on product properties and correct fertilizer application rates. Nutrinorm, our information platform to the outside world, provides the OCI Nitrogen Europe standard on efficient fertilizer application. Customers are regularly visited by Marketing & Sales employees or for Technical support and thus if required advised on proper handling and storage of the products.

5.9 Product application and farmer services

Specific product HSE information is made available to the end user through the distribution channel. OCI Nitrogen Europe makes Product Stewardship related information available to customers.

If applicable OCI Nitrogen Europe will respond to inquiries, complaints and emergency responses by customers and end-customers. Also to a larger public, relevant information is made available through e.g. Fertilizer Europe. Via the internet site Nutrinorm relevant agricultural information, regarding different types of fertilizers, application rates, soil management and how to spread fertilizers is provided to the end customer, the farmer.

Product brochures, storage and handling brochures and box signs are available and can be ordered for customers and farmers through our websites.

5.10 Monitoring and review

Product stewardship data and reports are regularly analyzed through the monitoring and reviewing of the HSE, security, responsible care and risk management processes. At all times a check on compliance with regulatory requirements is part of the daily operations.

Product Stewardship elements are audited as part of the regular internal audit processes. These internal audits are conducted according an internal audit plan as approved by OCI NV, our mother company, or the OCI Nitrogen Europe Monitoring Committee. The internal audit results are documented and agreed corrective actions are assigned to the relevant OCI Nitrogen Europe personnel. The findings are also reported to the OCI Nitrogen Europe Monitoring Committee.

Yearly a management review is executed, by the Management Team members under supervision of the Internal Control officer, including the Product Stewardship theme's and actions agreed. In case decided the applicable policies, procedures and working instructions are updated and adjusted. All management review actions are assigned and documented. The major findings are discussed in detail with the OCI Nitrogen Europe Monitoring Committee as well as the management comments and the action as agreed by management.