

Responsible Care® Verification Report

INEOS Canada Partnership

June 11 - 16, 2021



**CHEMISTRY INDUSTRY
ASSOCIATION OF CANADA**



Responsible Care®
Our commitment to sustainability.

Disclaimer

This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC), to provide advice to the member-company and assist it in meeting its Responsible Care[®] commitments. The material in this report reflects the team's best judgment in light of the information available to it at the time of preparation. It is the responsibility of the CIAC member-company that is the subject of this report to interpret and act on the report's findings and recommendations as it sees fit. Any use which a third party makes of this document, or any reliance on the document or decisions made based upon it, are the responsibility of such third parties. Although CIAC members are expected to share the results of this guidance document with interested parties, the Association, its member-companies, their employees, consultants and other participants involved in preparing the document accept no responsibility whatsoever for damages, if any, suffered by a third party as a result of decisions made or actions based on this report.

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EXECUTIVE SUMMARY

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of INEOS Canada Partnership. The verification was undertaken virtually on April 22 & June 11, 14, 15, 16, 2021 using Microsoft Teams audio visual technology, and focussed on the Joffre, Alberta facility. The team also met virtually with representatives of the Joffre site's community advisory panel, referred to as JCAP. This was the seventh Responsible Care verification completed for INEOS Canada Partnership. The last verification was completed on May 16 & June 20/21, 2018.

As a result of the examination conducted, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The verification is complete and no further involvement is required by the verification team.



Dave Mack
Verification Team Leader

July 28, 2021

For more information on this or a previous Responsible Care Verification Report, please contact your local company site or the company's overall Responsible Care coordinator:

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Summary of Verification Team Observations

Works in Progress

The following relate to self-initiated actions in support of continual performance improvement.

- i. Developing a strategic energy management program sponsored by the provincial and federal governments, with a view to the site achieving ready status with respect to ISO 50001, which specifies requirements for an energy management system.
- ii. The current corrective actions data management system is in the process of being replaced with a new process.

Improvement Opportunities

The following relate to suggested actions that could enhance the effectiveness of current programs.

- i. Fix typo in the professional practice management plan document Section 4.1, last sentence of last bullet to read "INEOS has Responsible Care[®] in place, which has been verified by the Chemistry Industry Association of Canada (CIAC)."
- ii. Consider implementing regular Responsible Care related reviews of other locations of the on-site laboratory service provider, which are used by INEOS.
- iii. Consider aligning the maintenance priority process for Responsible Care related issues with the site process hazard analysis and health, safety and environment risk assessment procedures.
- iv. Check progress on the workplace exposure profile review identified as a work in progress at the previous verification, to ensure its completion.
- v. Benchmark the security vulnerability assessment process that was applied to site, against the related CIAC guide.
- vi. Benchmark the INEOS corporate crisis management and business support plan and the site emergency response plan against the CIAC guide for critical infrastructure and business continuity.
- vii. Carry out a full operational audit of the current waste management contractor. Refer to the CIAC guideline for evaluation of waste management contractors.
- viii. Consider including metrics or KPIs for water use as is done for energy and natural gas use.
- ix. Make complete Responsible Care Verification Reports available to all employees.
- x. Consider implementing enhanced ongoing training/education about Responsible Care to site personnel with a view to improving understanding of the ethic and principles of Responsible Care.
- xi. Include as defined pass/follow-up/fail process in the Customer Facility Review Form (e.g., something similar to the "Action Required" section in the Chemical Supplier Checklist)
- xii. Include a review of emergency response plans and shelter in place procedures when giving presentations on the site worst case scenarios to JCAP or other groups.
- xiii. Communicate details of the ground water monitoring program to JCAP
- xiv. As a contributor, maintain an active interest in overall Joffre petrochemical complex environmental performance that may be of interest to the community (e.g., water management).
- xv. Schedule a meeting with JCAP as soon as possible (i.e., virtual or face to face if restrictions allow). Note: No meetings have been held since pandemic restrictions were put in place early in 2020.
- xvi. Consider establishing a formal company policy for employee equity and diversity.
- xvii. Although sustainability is included in the management of change system, consider including wording specific to sustainability and environment in the thirteen principles of the Joffre LAO Plant Management System.

Successful Practices

The following relate to actions that strongly support sustained excellence in performance.

- i. The formally documented engineering professional practice management plan.

- ii. The defined operating envelope which provides focus on remaining within the safe process operating range.
- iii. The critical operations procedure “in use” sign-off process.
- iv. The operator training program and progression process.
- v. The equipment maintenance criticality and work prioritizing process.
- vi. The health and safety hazard identification process.
- vii. The safety data sheets, which are rolled out in 48 languages, ensuring that every country that uses INEOS products has access to the necessary information.
- viii. The chemical supplier and customer Responsible Care related self-assessment process.
- ix. The inclusivity of the weekly extended leadership team meetings where the status of current Responsible Care related data and information is reviewed in the presence of those representing each area of the operation.

1. Introduction

1.1 About Responsible Care Verification

As a member of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for INEOS Canada Partnership operations in Canada attests annually to CIAC and its peers that the company's operations conform to the expectations contained in the Responsible Care Commitments and are guided by *Responsible Care Ethic and Principles for Sustainability*.

The Responsible Care® Ethic and Principles for Sustainability

We are committed to do the right thing, and be seen to do the right thing.

We dedicate ourselves, our technology and our business practices to sustainability - the betterment of society, the environment and the economy. The principles of Responsible Care® are key to our business success, and compel us to:

- work for the improvement of people's lives and the environment, while striving to do no harm;
- be accountable and responsive to the public, especially our local communities, who have the right to understand the risks and benefits of what we do;
- take preventative action to protect health and the environment;
- innovate for safer products and processes that conserve resources and provide enhanced value;
- engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life-cycles;
- understand and meet expectations for social responsibility;
- work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirements and meet or exceed their letter and spirit;
- promote awareness of Responsible Care, and inspire others to commit to these principles.

As an element of this commitment to Responsible Care, INEOS Canada Partnership must, every three years, participate in an external verification intended to:

1. Provide the Executive Contact with an external perspective when assessing if the company is indeed meeting the intent of the Responsible Care Commitments, along with advice on areas that may require attention;
2. Identify opportunities for assisting the company when benchmarking its own practices and performance against those of its peers, thus supporting continual improvement;
3. Contribute to the credibility of Responsible Care amongst company personnel and stakeholders, as well as the stakeholders of the broader industry;
4. Identify successful company practices that can be promoted to peers in the CIAC membership; and
5. Support the identification of areas of common weakness so that collective tools and guidance can be developed to improve performance in those areas across the CIAC membership.

Verification is conducted according to a common protocol, developed by the association's members and others, including several critics of the chemical industry. The verification is generally conducted by a team consisting of:

- Knowledgeable industry experts with experience in Responsible Care;
- A representative of the public at large (usually with a public interest background and with experience in Responsible Care gained from serving on the CIAC's National Advisory Panel) and
- One or more representatives of the local communities where the company's facilities are located.

Once completed, the Verification Report is made publicly available through the CIAC website (www.canadianchemistry.ca). INEOS Canada Partnership is also expected to share the report with interested persons in its communities and other stakeholders as part of its ongoing dialogue processes.

Additional information on Responsible Care and / or the verification process can be found at the CIAC website www.canadianchemistry.ca, or by CIAC at glaurin@canadianchemistry.ca or (613) 237-6215 extension 233.

1.2 About INEOS

INEOS Oligomers operates six manufacturing sites, three in Europe (Belgium, France and Germany) and three in North America (one in Alberta, Canada and two in Texas, USA). The Oligomers business transforms hydrocarbon raw materials into high quality linear alpha olefins, which are used as co-polymers in polyethylene manufacturing as well as in surfactants, lubricants and oil drilling fluids. The Joffre, Alberta Plant is operated by INEOS Canada Partnership which manufactures linear alpha olefins and sodium aluminate, and is the sole in country INEOS Oligomers location subject to the CIAC Responsible Care commitments.

1.3 About This Verification

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of INEOS Canada Partnership. The verification was undertaken virtually on April 22 & June 11, 14, 15, 16, 2021 using Microsoft Teams audio visual technology, and focussed on the Joffre, Alberta facility. The team also met virtually with representatives of the site’s community advisory panel, referred to as JCAP. Attachment 2 contains a list of those individuals interviewed and their affiliations. This was the seventh Responsible Care verification completed for INEOS Canada Partnership. The last verification was completed on May 16 & June 20/21, 2018.

The verification team was comprised of the following individuals.

Name	Affiliation	Representing
Dave Mack	Consultant	<i>Industry</i>
David Guss	Consultant	<i>Industry</i>
Nadine Blaney	Consultant	<i>Public at Large</i>
Mark Visscher	JCAP Member	<i>Local Community</i>

2. Team Observations Concerning the Responsible Care Commitments (Codes and Benchmark and Collective Expectations)

During the verification of INEOS Canada Partnership, the verification team looked for evidence that the company was addressing the expectations documented in the Responsible Care Commitments (157 code elements plus 28 benchmark and collective expectations). In communicating its observations, the verification team will make repeated reference to the following categories of observations. It was noted that there were no Findings Requiring Action identified:

1. **Works in Progress;** document instances where the team has observed the company self-initiating actions in response to identified gaps and deficiency arising from other internal or external audit and review activities, or where the company has self-initiated important improvement opportunities.
2. **Successful Practices;** document instances where the team believes the company has taken actions that strongly support sustained excellence in performance, and which should be communicated throughout the CIAC membership.
3. **Improvement opportunities;** identify instances where the team has observed company actions and decision making as being largely consistent with the expectations detailed in the Responsible Care

Commitments, but for which the team is of the opinion that the company could support further improvement by considering alternate or additional benchmarks when undertaking its planning and decision making.

The verification team's observations of how the company has addressed the Responsible Care Commitments are as follows:

2.1 Team Observations Concerning Operations Code

The Operations Code defines environment, health and safety expectations regarding all company operational aspects including product manufacturing, transportation and distribution.

2.1.1 Design and Construction of Facilities and Equipment

A professional practice management plan is in place that specifies responsibilities and authority of personnel as they relate to engineering professional practice. There is also a defined project execution process in place that addresses all aspects of project management, design and construction. A comprehensive management of change procedure, designed to ensure that no unacceptable risks are introduced into the operation, is applied when changes are made to the manufacturing process and equipment. Process hazard analyses are applied to all changes. There are defined steps to determine the appropriate process hazard analysis methodology to be applied.

Improvement opportunity

- i. Fix typo in the professional practice management plan document Section 4.1, last sentence of last bullet to read "INEOS has Responsible Care[®] in place, which has been verified by the Chemistry Industry Association of Canada (CIAC)."

Successful Practice

- i. The formally documented engineering professional practice management plan.

2.1.2 Operations Activities

Process equipment operating conditions are defined in what is referred to as the site operating envelope. The operating envelope defines the safe process operating range. Monitoring is carried out to ascertain that equipment continues operating within that safe range. Where deviations from the defined range are observed, the root cause is identified, and corrective action taken. Formalized operating procedures are in place. Most procedures are on a three-year review cycle. Procedures which are deemed critical to safe operation are reviewed each time they are applied. There is a comprehensive operator training program based on a four-level progressive competency system. The on-site laboratory is operated by a contracted service provider that is certified to the International Organization for Standardization ISO-17025 General Requirements for the Competence of Testing and Calibration Laboratories. Defined laboratory policies and procedures are in place and reviewed annually. Defined transportation/distribution practices address how company product is managed throughout that phase of their life cycle. There is also a logistics risk management and assurance process in place that addresses the evaluation and assessment of risks with respect to the movement of products. Major railroad carriers are contracted to ship all products manufactured at the site. Recognized industry specifications are in place for the rail cars. Contracted service providers carry out regular inspections and maintenance on all rail cars. Defined procedures are in place for rail car loading. Responsible Care related performance is monitored for the railroads. For manufacturing operations, equipment critical to the safe and efficient operation of the plant has been identified. Scheduled preventive maintenance and inspection programs are in place. A defined ranking process is used to determine priorities for the execution of equipment maintenance.

Improvement Opportunities

- i. Consider implementing regular Responsible Care related reviews of other locations of the on-site laboratory service provider, which are used by INEOS.
- ii. Consider aligning the maintenance priority process for Responsible Care related issues with the site process hazard analysis and health, safety and environment risk assessment procedures.

Successful Practices

- i. The defined operating envelope which provides focus on remaining within the safe process operating range.
- ii. The critical operations procedure “in use” sign-off process.
- iii. The operator training program and progression process.
- iv. The equipment maintenance criticality and work prioritizing process.

2.1.3 Safety and Security

In the area of occupational health and safety, the site follows ten defined behavioural safety principles. There is a defined hazard identification, elimination and control process in place. The purpose is to prevent harm to people, and damage to equipment or the environment. It is expected that all physical tasks be assessed for hazards in accordance with this process. Regular site inspections are carried out to identify and correct safety, health, and environmental concerns. There is a defined industrial hygiene program in place. Hazard exposure monitoring results are used in developing safeguards to protect workers from harm. There is an established employee health assessment program in place, which addresses employee fitness to work in a safe and healthy manner. Occupational health and safety work procedures are defined. Contractors on site are expected to conform to these procedures. In the area of process safety management, the site has adopted the U.S. Occupational Safety and Health Administration 29 CFR 1910.119 Process Safety Management of Highly Hazardous Chemicals standard, the elements of which are integrated into the site health safety and environment management system expectations. A five-year hazard and operability study revalidation process is used to regularly assess and address any cumulative effects from plant changes made over that period of time. A quantitative risk assessment was initially conducted on the facility, by a recognized industry consultant. This included the identification of a worst-case incident scenario. This study has since been revalidated. Manufacturing site emergency response is coordinated on an overall Joffre petrochemical complex basis, with the INEOS facility being considered as a unit within the said overall plan. Anticipated emergency scenarios have been identified. There is a specific plan in place for the INEOS unit. Operating technicians function as first responders, supported by specialized personnel and equipment common to the Joffre complex. Emergency drills are regularly held by each operating team, and regular training on the emergency response plan is provided to all employees and contractors. INEOS is an active member of a local mutual aid group referred to as the “Lacombe County Mutual Aid Organization”. To assess the effectiveness of the program, regular mutual aid exercises are carried out based upon potential community impact scenarios. There is also a transportation emergency plan in place, which addresses such things the provision of technical advice and equipment in support of local incident responding agencies throughout the transportation corridor. Specialized contractors assist with on scene equipment and expertise. Transportation emergency exercises are regularly held. With regard to site security, all recommendations from a manufacturing site vulnerability assessment have been implemented and a security plan is in place. The site is fenced and there are surveillance, intrusion and access control systems in place. Transportation security is in place and includes rail car sealing, manifesting, and other related processes. With regard to critical infrastructure and business continuity, there is an INEOS corporate crisis management and business support plan in place which addresses decision making, ability to operate under different scenarios, and communications. There is a defined incident reporting and investigation process in place, which addresses incident review, identification of root cause and actions to be taken to prevent recurrence. Lessons learned are widely distributed.

Improvement opportunities

- i. Check progress on the workplace exposure profile review identified as a work in progress at the previous verification, to ensure its completion.
- ii. Benchmark the security vulnerability assessment process that was applied to site, against the related CIAC guide.
- iii. Benchmark the INEOS corporate crisis management and business support plan and the site emergency response plan against the CIAC guide for critical infrastructure and business continuity.

Successful Practice

- i. The health and safety hazard identification process.

2.1.4 Environmental Protection

Emissions to air and water are known and quantified. There are no toxic emissions from the site. Greenhouse gas emissions are verified annually by an independent party. A leak detection and repair program is in place to identify and deal with fugitive emissions from equipment. A ground water monitoring program is in place. Waste is profiled by type and managed in order of preference (i.e., by elimination, reduction, recovery/ reuse, recycling, destruction or rendering harmless, and storage). An approved service provider is contracted to manage waste handling, transport and disposal operations. There is a process to regularly check on how the waste management contractor disposes of company waste. Emissions and waste reduction objectives are established annually. There is a defined environmental management system in place, which is registered, and conforms to the International Organization for Standardization ISO 14001-2015.

Improvement opportunity

- i. Carry out a full operational audit of the current waste management contractor. Refer to the CIAC guideline for evaluation of waste management contractors.

2.1.5 Resource Conservation

Conservation of resources is addressed through on-going operational controls on their consumption, with a focus on performance improvement. A process furnace optimization study is currently underway. There is also some focus on water usage.

Improvement opportunity

- i. Consider including metrics or KPIs for water use as is done for energy and natural gas use.

Work in Progress

- i. Developing a strategic energy management program sponsored by the provincial and federal governments, with a view to the site achieving ready status with respect to ISO 50001, which specifies requirements for an energy management system

2.1.6 Promotion of Responsible Care by Name

There is a Responsible Care training module provided to all new hires. This is on-going for all employees. An annual onsite event is held, referred to as Responsible Care Wellness Days. The logo is displayed on letter head and business cards, and throughout the facility. The Responsible Care commitment is posted at the entry to the administration building. Responsible Care is also mentioned on the company web site. Responsible Care performance is reported to the site community and also through an annual publication referred to as Joffre LAO Plant - Responsible Care Statement.

Improvement opportunities

- i. Make complete Responsible Care Verification Reports available to all employees.

- ii. Consider implementing enhanced ongoing training/education about Responsible Care to site personnel with a view to improving understanding of the ethic and principles of Responsible Care.

2.2 Team Observations Concerning Stewardship Code

The Stewardship Code addresses all company raw materials, products and services and defines expectations for the care and control of same throughout their life cycle.

2.2.1 Expectations of Companies

Changes of a process development or efficiency nature are managed by the facility through the aforementioned management of change process. Ongoing risk assessments are carried out on company products. Product safety data sheets are maintained current and widely distributed in several languages. None of the raw materials or final products are precursors for illicit misuse. There are no historical waste sites associated with the operation.

Successful Practice

- i. The safety data sheets, which are rolled out in 48 languages, ensuring that every country that uses INEOS products has access to the necessary information.

2.2.2 Expectations with Respect to Other Parties

Company other parties include contract carriers, waste contractors, chemical product suppliers, site contractors, laboratory services, and customers. Contract carriers and waste contractors are addressed in the Operations Code section of this report. There are processes in place that include for Responsible Care related expectations with respect to the selection and performance monitoring of chemical product suppliers, site contractors and laboratory services. New customers are assessed and qualified based on end use and safety performance, prior to product delivery. Sales personnel routinely follow-up with customers regarding their performance.

Improvement opportunity

- i. Include as defined pass/follow-up/fail process in the Customer Facility Review Form (e.g., something similar to the "Action Required" section in the Chemical Supplier Checklist)

Successful Practice

- i. The chemical supplier and customer Responsible Care related self-assessment process.

2.3 Team Observations Concerning Accountability Code

The Accountability Code defines expectations for communication and dialogue with communities local to company manufacturing and distribution operations and transportation corridors, as well as other stakeholders with an interest in company activities.

2.3.1 Operating Site Communities

Community outreach is integrated with other operations on an overall Joffre petrochemical complex basis. The local community is primarily defined as those residing or doing business within a five kilometre radius of the plant. This is based upon the overall complex incident potential for off-site impact. The community is made aware of emergency response plans and there is a call out system to advise of, and precautions to take, in case of emergency situations. There is a community advisory panel in place, referred to as JCAP. Meetings are held quarterly, and semi-annual open houses take place. Responsible Care related performance is communicated to JCAP, including information on the site's worst case incident scenario. Two-way dialogue takes place at these sessions on a range of topics. Social Responsibility at the facility includes providing financial support to community or charitable groups and organizations. There is an informal focus on employee equity and diversity at the facility. Employees may take a defined annual period of paid time off when volunteering in the

community. There is a business ethics code of conduct in place that all employees are required to regularly review.

Improvement opportunities

- i. Include a review of emergency response plans and shelter in place procedures when giving presentations on the site worst case scenarios to JCAP or other groups.
- ii. Communicate details of the ground water monitoring program to JCAP
- iii. As a contributor, maintain an active interest in overall Joffre petrochemical complex environmental performance that may be of interest to the community (e.g., water management).
- iv. Schedule a meeting with JCAP as soon as possible (i.e., virtual or face to face if restrictions allow). Note: No meetings have been held since pandemic restrictions were put in place early in 2020.
- v. Consider establishing a formal company policy for employee equity and diversity.

2.3.2 Other Stakeholders

Interface with government officials occurs at appropriate levels on an as needed basis, primarily through CIAC involvement. This may also apply on occasion to other potential stakeholders. Company product is not sold to retail consumers. The site supports the CIAC transportation awareness and emergency response initiative, referred to as TransCAER, and actively participates in the association's prairie regional committee and events. There are no indigenous communities adjacent to the facility that may be impacted by the operation.

3. Team Observations on the Company Management System

It is a requirement of Responsible Care that companies have a documented, self-healing management system or systems capable of identifying and responding to deficiencies and otherwise supporting continual improvement across all company business units, functions, and sites and as a framework for implementing the Responsible Care Commitments. The verification team studied the INEOS Canada Partnership management system(s) and compared and contrasted the attributes of that system(s) to those of a self-healing overall management system as discussed in the CIAC Responsible Care Commitments document. The verification team's related observations to the company management system(s) are as follows:

3.1 Observations on the PLAN Step

During the 'PLAN' Step of the management system, the company is required to decide what the goals of the company are and how they will be met. In determining those goals, it is expected the company will look inward, across its operations, but will also look outward, considering the expectations of: stakeholders; regulatory requirements; relevant CIAC Responsible Care Commitments and supporting tools; and other industry benchmarks.

Objectives and targets for the site are identified in what is referred to as an Annual Performance Contract which is signed by the Site Director and the Operations Director. The Responsible Care codes, business requirements, stakeholder input and industry best practices are considered during this stage. Resource capability review and establishing indicators are included in this process.

3.2 Observations on the DO Step

During the 'DO' Step in the management system, the company is required to convert the decisions of the 'PLAN' Step into action and ensure awareness and understanding by all involved. It is expected that the company will implement an organizational structure, assign responsibilities to appropriate personnel, supply sufficient training and resources to execute planned actions and develop and document standards, procedures and programs, as applicable.

There are thirteen defined elements to the facility's Responsible Care related management system, referred to as the Responsible Care Management System (RCMS). The RCMS is a documented, self-healing management system or systems capable of identifying and responding to deficiencies and otherwise supporting continual improvement across all company business units, functions, and sites and as a framework for implementing the Responsible Care Commitments. The verification team studied the RCMS and compared and contrasted the attributes of that system(s) to those of a self-healing overall management system as discussed in the CIAC Responsible Care Commitments document. The verification team's related observations to the RCMS are as follows:

as The Joffre LAO Plant Management System, following the plan-do-check-act continual improvement process, and a matrix has been developed to cross reference the CIAC Responsible Care expectations to the corresponding sections within the overall management system. Based upon the complexity of related objectives, implementation responsibilities are assigned to single individuals or groups within the company organization. Responsible Care commitments are fully integrated into the site organization. Critical Responsible Care related skills are embedded in job descriptions with training requirements defined. Assignment of training, testing and records are managed within a system referred to as Virtual Training Assistant. A series of defined procedures are in place to address Responsible Care related activities.

Improvement opportunity

- i. Although sustainability is included in the management of change system, consider including wording specific to sustainability and environment in the thirteen principles of the Joffre LAO Plant Management System.

3.3 Observations on the CHECK Step

During the 'CHECK' Step in the management system, actions carried out in the 'DO' Step are required to be assessed to determine if they are actually being carried out according to plan, and whether they are achieving the desired outcomes and delivering continual improvement. Here, the overall management system and components should be reviewed along with employee competences for assigned responsibilities, internal and external audits should be undertaken, incidents should be assessed to identify root causes, and performance measurement should be conducted and reviewed.

Monitoring and assessment of Responsible Care related performance versus established objectives and targets is routinely carried out by site leadership. The overall Responsible Care management system undergoes an internal audit on a three-year cycle. The environmental management system is audited annually, and the Principles of Process Safety and Behavioral Safety are audited every three years. There is a regulatory matrix identifying applicable laws, regulations and standards. This is routinely monitored to determine compliance. There is a defined process in place to address employee performance. Incident reporting and investigation is included in the Operation Code section of this report.

Successful Practice

- i. The inclusivity of the weekly extended leadership team meetings where the status of current Responsible Care related data and information is reviewed in the presence of those representing each area of the operation.

3.4 Observations on the ACT Step

During the 'ACT' Step in the management system, the company is required to translate the results of the 'CHECK' Step into corrective actions for improvement. This includes revisiting the 'PLAN' Step to decide whether changes are needed to the company's stated goals or action plans, policies and procedures for achieving those goals. Considerations when examining the 'ACT' Step should include whether and how: audit and review findings are responded to; performance is communicated internally and externally; employee and contractor performance is rewarded or corrected, etc.

Once corrective actions are assigned, findings from audits, inspections, observations, and assessments, etc. are recorded in a data management system, where they are tracked to completion. Objectives and targets may be revisited when desired results are not being achieved, where there has been a change in expectations, or where other related follow-up is required. There is a process in place for monitoring employee performance, and individuals are frequently rewarded accordingly.

Work in Progress

iii. The current corrective actions data management system is in the process of being replaced with a new process

4. Team Observations on the Responsible Care Ethic and Principles for Sustainability

Each CIAC member company is formally committed to the ethic of “*Doing the right thing and being seen to do the right thing.*” This ethic, along with the principles for sustainability is expected to guide the company’s decision making and practices. In conducting the verification, the team is looking to understand how well the ethic is understood and adopted within the company, and the degree to which the principles inform the manner in which the company does its business. The verification team carefully observed the INEOS Canada Partnership decision making processes and actions and compared and contrasted the attributes of those with the attributes of a company guided by the Responsible Care Ethic and Principles for Sustainability as discussed in the Responsible Care Commitments document. The verification team’s related observations on the company’s application of the *Responsible Care Ethic and Principles for Sustainability* are as follows:

Through observation and analysis, the company was seen to be appropriately aligned with the following elements of the *Responsible Care Ethic and Principles for Sustainability*. Refer to the explanatory notes following each element:

- *Work for the improvement of people’s lives and the environment, while striving to do no harm.*
[Supported by a clear commitment to Responsible Care]
- *Be accountable and responsive to the public especially our local communities, who have the right to know the risks and benefits of what we do.*
[Supported by commendable community outreach efforts]
- *Take preventive action to protect health and the environment.*
[Supported by a well defined management system with connected environment, health and safety processes and procedures]
- *Innovate for safer products and processes that conserve resources and provide enhanced value.*
[Research and development activities related to this aspect are addressed at the INEOS corporate level]
- *Engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life cycles.*
[Supported by processes to select and monitor Responsible Care related performance of other parties (e.g., contract carriers, waste contractors, chemical product suppliers, site contractors, laboratory services, and customers)]
- *Understand and meet expectations for social responsibility.*
[Supported by commendable efforts in this area (e.g., providing financial support to community or charitable groups and organizations), and addressing employee equity and diversity]
- *Work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirement and meet or exceed their letter and spirit.*
[Primarily through CIAC business level involvement]
- *Promote awareness of Responsible Care and inspire others to commit to the principles.*
[On-going efforts in this area with business partners]

5. Verification Team Conclusion

As a result of the examination conducted, and in consideration of the observations communicated within this report, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The verification is complete and no further involvement is required by the verification team.

Company Response to Verification Team Report

On behalf of INEOS Canada Partnership, I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

As an active member of CIAC we welcome the feedback from the verification team. The verification reinforces the important aspects of Responsible Care and helps us maintain the Responsible Care ethic and principals at our site. The diverse background of the verification team allowed for a thorough evaluation of our management system and the identification of improvement opportunities. As with pervious verification the participation of a member from our local community advisory panel has been greatly appreciated.

INEOS Canada Partnership will communicate the results of the verification exercise with its CIAC peers at their next meeting, and will discuss the verification results with our stakeholders, including those representing communities near our operating site.

We will give consideration to the Improvement Opportunities identified by verification team and will assist the CIAC in communicating and sharing the identified Successful Practices to other CIAC members. Plans will be developed and implemented to respond to those Works in Progress where completion of such is action required to close gaps with respect to requirements, as identified by the verification team. Our progress in implementing those plans will be discussed when preparing our Annual Statement of Re-Commitment to Responsible Care and communicated to the verification team at the time of our next verification.

Joe Szpak
Joffre Site Director
INEOS Canada Partnership.
July 28, 2021

Interview Lists

A: Company Personnel

Name	Position	Location
Andy Nokes	Project Engineer	Joffre, Alberta
Barry Miller	Maintenance Consultant	Joffre, Alberta
Brandon Andrus	Senior Safety Specialist	Joffre, Alberta
Christina Duppstadt	Product Steward	Marina View, Texas
Chuck Obst	Environmental Specialist	Joffre, Alberta
Gord Schiller	Logistics Supervisor	Joffre, Alberta
Joe Szpak	Site Director	Joffre, Alberta
John Mulgrew	Human Resources/Safety, Health & Environment Manager	Joffre, Alberta
Larry Couronne	Operations Chief Engineer/Training Coordinator	Joffre, Alberta
Rafael Sawick	Technical Manager	Joffre, Alberta
Stephen Langmaid	Laboratory Supervisor	Joffre, Alberta
Tyler Rauckman	Management of Change Coordinator	Joffre, Alberta
Work Team Representatives	E Crew	Joffre, Alberta

B: External Stakeholders

Name	Company / Organization	Position	Location
Mike Forsyth	JCAP	Member	Joffre Plant Community
Jim Robertson	JCAP	Member	Joffre Plant Community
Mark Visscher	JCAP	Member	Joffre Plant Community
Kathy Pyper	JCAP	Member	Joffre Plant Community



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