

Subject: Health, Safety, Security and Environmental (HSSE) Progress Report Doedijns b.v.
Ref: DD-004
Version: June 2018

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 Dutch 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, business unit(s) of Doedijns are certified to the worldwide Environmental standard ISO14001.

Dutch national laws

Doedijns meets the requirements of the Dutch national laws for protection of its employees (labor law) and the Environment. The subsidiaries are reviewed by the governmental environment departments on regular base and possible shortcoming are picked up accordingly.

Nanoparticles

The expected occupational hazards of working with nanoparticles and the risks of exposure to nanoparticles are one of the main points of focus of the Dutch Labour Inspectorate. In 2011 Doedijns has notified all its suppliers to make sure they will inform Doedijns about the possible presence of nanoparticles in their products as soon as possible. An updated material safety data sheet (MSDS) should then be send to Doedijns.

Within the painting department of Doedijns, employees are equipped with fresh air supply to limit inhalation of vapours with nanoparticles to a minimum.

European laws

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

Directive 2014/34/EU (formerly 94/9/EC): ATmosphères EXplosives (ATEX 114) Directive

This directive describes the equipment in an environment with an explosive atmosphere. Doedijns has recently started or accomplished the following actions:

1. Making the ATEX directive one of the focus areas of the engineering departments.
2. Withdraw the certification of the management system of Doedijns to the international standard IEC80079-34 due to the move of the production activities of two products.
3. Third party supervision for the delivery of Ex-related products.

Directive 1999/92/EC: ATEX 153 Directive (formerly ATEX 137)

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. Classify several areas within one of the facilities of Doedijns into zones, including marking these zones with the corresponding hazards pictograms.
3. Completion of a – so called – Explosion Safety Document, including the regular review of the document.

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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. Notifying all its suppliers to make sure that purchased (complete and uncompleted) machines, lifting equipment and safety components are designed and built according to the terms of this directive And delivered with an EC declaration of conformity (IIA) or a declaration of incorporation of partly completed machinery (IIB).
2. Investigating the impact of the Noise Emission directive for our products.
3. Elimination of the Task Force, which was established to provide the internal users the necessary information and resources to fulfil the needs of this directive. The responsibilities are transferred to the appropriate process owners, the managers of the engineering departments.
4. Organising training and education for (new) personnel at the engineering departments.
5. Making the requirements of this directive part of the implementation of a generic document regarding all relevant CE directives.
6. Organizing a - so called – ‘CE audit’ by a third party at a hydraulic power system before shipment. The hydraulic power system served this purpose as a representative product within Doedijns . All recommendations are now a part of the standard CE-documentation within Doedijns.
7. Appointed new ‘first points of contact’ within the engineering department by the Engineering Manager of both production facilities within the Netherlands.
8. All Machinery Directive related documentation part of the Engineering department page on the intranet.

Directive 2014/35/ (formerly 2006/95/EC): Low Voltage Directive (LVD)

This directive covers electrical equipment with a voltage between 50 and 1000V for alternating current and between 75 and 1500V for direct current. Doedijns has made the requirements of this directive a part of a generic document regarding all relevant CE directives. To adapt our management system to the requirements of the LVD.

Directive 2014/30/EU (formerly 2004/108/EC): Electro Magnetic Compatibility (EMC)

The EMC Directive concerns electromagnetic emissions of equipment in order to ensure that such equipment does not disturb radio and telecommunication and other equipment. The directive also ensures this equipment is not disturbed by radio emissions. Doedijns made the requirements of this directive a part of a generic document regarding all relevant CE directives.

Directive 2014/68/EU (formerly 97/23/EG): 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 actions:

1. Elimination of the Task Force and transfer of the responsibilities to the appropriate process owners: the managers of the engineering departments.
2. The requirements of this directive are made a part of a generic document regarding all relevant CE directives to adapt our management system to the requirements of the PED directive

Directive 2014/29/EU (formerly 2009/105/EC): 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

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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 actions:

1. Our QA/HSE manager acts as single point of contact. Please see the contact information at the bottom of this letter.
2. Notifying all our suppliers to make sure that they are aware of the REACH regulation and comply with the requirements. Suppliers at least need to inform Doedijns when a product contains more than 0.1% of weight of any substance of very high concern (SVHC).
3. 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.
4. Withdrawing the pre-SIEF membership of a substance as this involved one of the ingredients of a product traded by our former facility in Assen.

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 articles, based on the information received from our suppliers.
2. Provide SVHC information relating to our products within 45 days on request of any customer (often called "Green Passport", "Black&Grey lists" or Inventory of Hazardous Materials (IHM)).
3. Investigating and avoiding possible delivery problems of chemicals due to no - or delayed - registration by manufacturers or importers.

Regulation 1272/2008: Global Harmonised System on Classification, Labeling and Packing of hazardous substances and mixtures, EU-GHS (CLP)

In 2011 Doedijns has notified all its suppliers to make sure that:

1. Classification, labelling and packing of substances and mixtures takes place at the supplier according to the time schedule mentioned in the legislation.
2. An updated safety data sheet will be send to Doedijns when classification, labelling or packing has changed.

For more information about our efforts regarding the safety data sheets, please see the paragraph about REACH.

Regulation 2011/65/EU: Restriction of Hazardous Substances (RoHS)

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 6 substances: 4 metals (mercury, lead, cadmium, chromium-6) and 2 flame retardants (PBB and PBDE). Since 2015, 4 substances have been added to this regulation: DEHP, BBP, DPB and DIBP (all max. 0.1%).

In 2011 Doedijns started notifying its suppliers on a regular base to make sure that the electrical and electronic equipment to which this legislation applies do not exceed the established concentrations of hazardous substances. 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.

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. Register all data processing related to persons in one overview.
2. Updated all our communications including our website.
3. Complementing our Privacy statement for compliance to this regulation.

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4. Inform all employees about our registrations of their personal data.

Directive 2012/27/EU: Energy Efficiency Directive (EED)

This directive mandates Energy Efficiency improvements within the European Union - in order to meet its energy efficiency headline target of 20% by 2020 - and entered into force on 4 December 2012. As one of our business units is a – so called - a large-scale consumer Doedijns has recently started or accomplished the following actions:

1. An energy audit carried out by a third party.
2. The energy audit report approved by the governmental environment department.
3. All recommendations as stated in the report part of the internal action plan for follow up.
4. Energy audit part of central register for ensuring timely successive review.

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. To ensure compliance with these requirements Doedijns has accomplished or started the following actions:

1. Notifying all – critical - suppliers to make sure that they are aware of these rules and to obtain the necessary information in order to ensure that the ‘conflict minerals’ are not a part of the products.
2. Ask the suppliers to fill in a questionnaire with regard to this subject including asking all smelters used by our company and its suppliers to validate the compliance in accordance with the Conflict Free Smelter Program and listed on the Compliance Smelter List.
3. Registration at the iPoint Conflict Minerals Reporting Template (CMRT), an initiative of EICC and GeSI, and at AGCO Corporation’s 2014 Conflict Minerals Survey system.
4. The purchase manager acts as the single point of contact.

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.

Final

At this moment we are, to our honor and 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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