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|  | Company Management System | | | |
| | MAJOR ACCIDENTS PREVENTION POLICY TEMPA ROSSA LPG CENTRE | | | |
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MAJOR ACCIDENTS PREVENTION POLICY FOR TEMPA ROSSA LPG CENTRE

| Rev. ## | Date | Main modifications |
|---------|------------|---|
| 04 | 2/09/2024 | 2-yearly mandatory review. |
| 03 | 2/09/2022 | Complete review from first inspection visit (R2), results from the Gestore's annual review and biennial review. |
| 02 | 4/09/2020 | Biennial review with adaptation to the new organizational structure in the production phase. |
| 01 | 13/07/2018 | SGS articulation integration. Change of references for establishment. Implementation program integration. |
| 00 | 11/08/2017 | First issue. |


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1. INTRODUCTION

This Document constitutes the "Policy Document" developed in compliance with the provisions of Annex B of Legislative Decree 105/2015 "Implementation of directive 2012/18/EU relating to the risks prevention of major accidents connected with dangerous substances", deriving from the subjection of the LPG Centre "Tempa Rossa" plant, operated by TotalEnergies EP Italia SpA (hereinafter TEEPIT), to the obligations of the aforementioned Decree.

The "Tempa Rossa" LPG Centre pursuant to art. 13 of Legislative Decree 105/2015 is subject to the obligations pertaining to the classification of "upper threshold establishment". Among the obligations deriving from the subjection to the provisions of the Decree, art. 14 it is envisaged that the **Manager** (hereinafter **Gestore**) issues a document that defines the "Major Accident Prevention Policy" of the Organization, on the basis of which the Safety Management System (hereinafter SGS) was developed aimed at preventing RIRs (rischi incidenti rilevanti - major accidents risks), tailored with the entity of the RIRs and the Organization.

This Policy Document includes the objectives and principles of action of the Gestore and describes the general and specific objectives of the adopted SMS, its structure, the implementation program and the improvement plan in order to prevent the risk of a major accident, while ensuring a high level of protection of human health and the environment.

The Gestore undertakes to disseminate this Policy Document to all personnel, including the personnel of the contracting companies that access the plant, and to all directly and indirectly interested parties, taking care that it is made operational, kept active and reviewed and , updated if necessary, at least every two years, or in the event of a modification with increased risk pursuant to art. 18 of the Legislative Decree. 105/2015.

In the definition and updating phase of the Policy Document, the Gestore consults the Workers' Safety Representatives (RLSA) pursuant to Appendix 3 of the Legislative Decree. 105/2015.

In addition to this Policy Document, in the process of improving the Safety Management System, following the first inspection visit ex. art.27 Legislative Decree 105/15, a more concise document has been issued (Policy in one-page format, code 0-CHA-HSEQ-002) aimed at summarizing the Gestore's commitments in a more direct format available for the personnel in the places where it is posted at the LPG Centre Plant.


In setting up the Document, due consideration was also considered:

- the TEEPIT Safety, Health, Environment, Quality and Energy Charter (0-CHA-HSEQ-001);
- the One-MAESTRO principles and expectations (DIR-GR-HSE-001 & CR-GR-HSE-001) which constitutes the structure of the HSE management system of the TotalEnergies company, unique for all branches.

The Safety Management System for the prevention of major accidents (SGS-PIR) defines, within the HSE management system and the company organizational structure, the responsibilities, procedures, processes, and resources for the implementation of the Policy prevention of major accidents (see also major accidents as defined by TotalEnergies), in compliance with current health, safety and environmental regulations.

The phases for the implementation of an SGS-PIR within a company meet the requirements of Annex B of the Legislative Decree. 105/2015, as reported below:

✓ **Initial check** (analysis of company processes, both primary and support, through the reconstruction of the phases, identification of the activities carried out, of the subjects involved, of

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the inputs and outputs, of the health and safety risks connected to the elements mentioned above, of the risks of major accident connected to the use of dangerous substances, of the binding regulatory obligations relating to the specificity of the activity carried out);

✓ **Definition of policy** (identification of objectives and commitments that the Gestore undertakes, following the indications of art. 14 of Legislative Decree 105/2015, as highlighted by the initial analysis, and the production capabilities of the company system);

✓ **Planning** (drafting of a plan of activities necessary to achieve the specific objectives, with identification of the activities and resources required, times, subjects in charge of execution and verification, indicators and standards for the periodic evaluation of the degree of achievement of the objectives);

✓ **Organization** (definition of the company organization chart to achieve the objectives with identification of tasks, authorities and responsibilities and preparation of the necessary management tools such as manual, procedures, forms, ...);

✓ **Staff awareness** (provide all subjects and company functions involved in the SGS-RIR with the knowledge and skills necessary to carry out an active and effective role with respect to the pursuit of individual objectives);

✓ **Monitoring** (periodic checks on the performance of the system in terms of its effectiveness and efficiency);

✓ **Review** (identification of the system objectives achieved with the setting of adequate corrective and preventive actions to be included in an improvement plan).

The strategic and concrete advantages that a production activity obtains by adopting the SGS in the correct and safe management of plants and in promoting staff awareness are:

- the reduction of the risk of a major accident, thanks to the timely verification of the efficiency of the systems and through the reduction of operational management mistakes;
- the improvement in the management of primary and support processes, and therefore of the resources available;
- monitoring and reducing safety costs (accidents, accidents, non-compliance in general);
- the active and continuous involvement of subjects in a process of improving individual and corporate performance;
- positive dialogue with the supervisory body and control bodies.


2. DEFINITION OF THE GENERAL AND SPECIFIC SGS TARGETS

The main objective of TEEPIT is to ensure the balance between company production targets and the protection of the health and safety of people, the environment, and assets.

Company willingness it's to operate in compliance with the safety of workers and the population surrounding the plant and the protection of the environment, preventing the occurrence of major accidents and/or mitigating any effects.

So, activities to be carried out in conditions of higher safety, the company has developed and implements an Integrated Safety Management System, based on compliance with Legislative Decree 105/15, the mandatory regulations on safety and the environment and as not regulated by them, on company specifications and standards.

For this purpose, the Seveso Gestore guarantees for the LPG Centre to pursue the following specific corporate objectives, in line with the One-MAESTRO principles and the key Seveso elements:

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1. Leadership and Management Commitment - The key positions in the organizational structure of the LPG Centre and for the SGS Management System are identified by recognizing that people, safety and environmental protection are management responsibilities that extend from the operational work teams, to the various Managers/Directors, to the Gestore up to the Managing Director. As a result of this commitment, adequate resources are made available to support the implementation of this Policy document.

2. Compliance with Laws, Regulations and Company Requirements - Compliance with the fundamental elements of the Seveso directive, applicable laws, regulations and the HSE Referential or reference standard of TotalEnergies.

3. Risk management - Ensure that hazards are systematically identified, and risks managed effectively to prevent HSE events, such as leaks of hazardous substances, considering the presence of prevention, control, mitigation and rescue barriers in normal operating conditions or in the event of any aggravating situations or threats to integrity.

4. Operational Responsibility - Management of the systems in compliance with the operating manuals containing the instructions for controlling the process and equipment of the “Tempa Rossa” LPG Centre in the different operating conditions and in particular for the management of alarms and blocks or inhibitions. At the same time, specific procedures are drawn up for the management of change, of different operating conditions (temporary stops and start-up phases) to define the inspection, testing and maintenance activities of assets and equipment or critical barriers for the protection of personnel safety, of environmental assets (SECE).

5. Contractors and Suppliers - Encourage the selection of suppliers and contractors based on their ability to apply policies similar to those of TEEPIT regarding safety, health, environment and quality. In order to guarantee compliance of supplies of equipment, materials and services with the minimum requirements of safety standards, the necessary controls, criteria and procedures are defined within the HSE management system.

6. Skills and Training - Ensure that all staff have received adequate training and information, to be competent for the tasks they are called upon to carry out, as identified by the HSE training matrix which includes mandatory training in addition to induction before accessing the LPG Centre and the quarterly Seveso training.


7. Emergency Preparedness - Implement a robust and documented emergency response organization capable of effectively addressing situations that may cause a major accident. The organization is in line with the prevention of Major Accidents and Top Events identified in safety studies and with internal/external emergency plans. The internal emergency management plans are verified and updated every three years or following events, feedback from drills, organizational changes, and updates of accident scenarios.

8. Learning from Events - Promote a culture of safety and environmental protection through the application of the TotalEnergies Golden Rules. Encourage reporting of hazardous situations and analysis of anomalies, incidents and HSE events to identify root causes and corrective actions to implement. Share events through the Feedback of Experience (REX) process, Safety Alerts, or safety notifications/feedback.

9. Monitoring, Audit and Inspection – Continuously monitor the effectiveness of the SGS management system through audits and inspections and report the result to the TEEPIT CODIR.

10. Performance Improvement - Identify measurable key performance indicators aimed at preventing the occurrence of significant accidents, including occupational ones, useful for monitoring the overall HSE performance of the Branch.

These objectives are summarized in document 0-CHA-HSEQ-002 posted at the “Tempa Rossa” LPG Centre Plant and are developed as detailed below, thanks to the organizational structure and documentation of the SGS.

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3. GENERAL PRINCIPLES AND REFERENCE STANDARDS

TEEPIT, as an Italian branch operating in the exploration and production sector of the TotalEnergies group, is encouraged and supported by the parent company in pursuing its objectives in terms of safety and prevention of major accidents, inspired by the following general principles:

THE GESTORE'S COMMITMENT

The **Gestore Seveso** is constantly committed to the implementation of this Policy Document, demonstrating its consistency and maximum involvement in its behaviour. The commitment undertaken is continuously transmitted to all those who operate within the site, implementing the appropriate actions and necessary controls aimed at verifying the effectiveness of the implementation.

RESPONSIBILITY FOR THE PREVENTION OF THE RISKS OF MAJOR ACCIDENTS

Responsibility for the implementation of the Policy and the defined safety objectives lies with different functions in line with the branch organizational chart and the safety one (Annex E).

MOTIVATION AND PARTICIPATION OF EMPLOYEES AND THE INVOLVEMENT OF CONTRACTORS

The Policy is shared by the Seveso Gestore with all internal staff and with the contracting companies involved in the activities of the "Tempa Rossa" LPG Centre plant in order to achieve the objectives set in the prevention of major accidents. The contents of the Policy Document are also illustrated during information and training activities.

The Seveso Gestore undertakes to:


- prevent major accidents to protect people, property and the environment;
- pursue the "zero accidents" objective;
- prevent pollution and limit all possible impacts on the environment;
- ensure compliance with legal provisions and safety standards;
- support and motivate staff in promoting safety;
- consider safety as the fundamental value of professional performance.

To this end, the following have also been developed:

- a SharePoint [Seveso & Tempa Rossa - Home \(sharepoint.com\)](https://sharepoint.com);
- a dedicated internet page "Seveso III & Tempa Rossa Directive" [Management Systems | TotalEnergies Italy](#);
- e-learning information modules available on the SicurPoint platform for sharing updated documents with all internal and external staff.

RELATIONSHIP WITH STAKEHOLDERS AND THE COMMUNITY

The relationship with Authorities delegated to monitor compliance with the legislation and with the institutions representing the population surrounding the Plant is aimed at maximum collaboration and transparency.

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The conduct of activities considers the following needs:

- ✓ maintain collaborative relationships with the surrounding community;
- ✓ respond clearly and promptly to any needs;
- ✓ contribute to the development of a widespread culture on accident prevention.

BEST TECHNOLOGIES AND MAINTENANCE OF THE SYSTEMS

In the introduction of new systems, new technologies and new substances, priority is given to systems, equipment, machines, equipment, devices and materials that present the best characteristics in terms of safety.

The goods, systems, equipment, machines, equipment, devices and in general the material elements involved in the operations are subject to maintenance and inspection activities to ensure their reliable safe operation.

DOCUMENTABILITY AND TRACEABILITY OF ACTIONS

Every action in the field of major accident prevention is adequately documented.

Each document is collected in an organized and consultable archive in order to trace the action implemented, in line with the Company Management System (CMS).

4. REFERENCE LEGISLATION & GUIDELINES

The Safety Management System was developed in compliance with:

- the Legislative Decree 105/2015: implementation of Directive 2012/18/EU relating to the control of the danger of major accidents connected with dangerous substances;
- the relevant standards listed in the Register of Applicable Legislation (REGLEG), an SGS tool which also ensures that updates and modifications to current legislation are constantly verified. The register and rules are made accessible and consultable through the “Seveso & Tempa Rossa” SharePoint to all staff.

Furthermore, the SGS is also developed in accordance with:


- to TEEPIT's “Safety, Health, Environment, Quality and Energy” Policy (0-CHA-HSEQ-001);
- to One-MAESTRO principles and expectations (DIR-GR-HSE-001 & CR-GR-HSE-001);
- to the company rules for the prevention of technological risks and Major Accidents and to the returns on experience (REX).

5. SGS GENERAL REQUIREMENTS

Annex B of the Legislative Decree. 105/2015 establishes in § 2.1. the general requirements of each SGS to ensure the achievement of the general objectives and intervention principles defined in this major accident prevention policy document.

In particular, the SGS must:

- a) define and document the Policy, the objectives and commitments established by it for safety;
- b) ensure that this Policy is understood, implemented and supported at all company levels;
- c) verify the achievement of the objectives and define the related corrective actions.

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TEEPIT's SGS responds to these requirements and was prepared and implemented after consulting the RLSA (Art.14 of Legislative Decree 105/2015).

6. SGS STRUCTURE

Seveso Gestore undertakes to create, adopt, and seek continuous improvement of the SGS for the prevention of major accidents in implementation of the requirements of the art. 14 paragraph 5 of the Legislative Decree. 105/2015 with the support of TEEPIT's HSSE Direction.

The SGS includes the part of the general company management system relating to the organizational structure, responsibilities, procedures, and resources.

The SGS also refers to elements of the management system relating to quality, safety and hygiene in the workplace and environmental protection. It is linked to the referential procedures of the TotalEnergies Group, also allowing the sharing of good safety practices and experiences of the operational sites of the various branches of the group, encouraging the improvement and continuous growth of the Management System and of the personnel responsible for safety.

The SGS is structured to define:

- a. corporate safety policy and management;
- b. the technical, administrative and safety organization of human resources;
- c. planning of activities aimed at continuous improvement;
- d. the measurement of performance achieved in terms of safety and environmental protection against specific criteria;
- e. the verification and review of performances, including inspections (safety audits).

7. SGS DETAILS


In accordance with Annex B, Annex H - Appendix 3 – Checklist (lista di riscontro) - of the Legislative Decree. 105/15, the fundamental elements of the Safety Management System for the prevention of major accidents are the following:

1. Prevention policy document, structure of the SGS and its integration with company management (discussed in the previous chapters).
2. Organization and staff.
3. Identification and assessment of relevant hazards.
4. Operational control.
5. Change management.
6. Emergency planning.
7. Performance check.
8. Control and review.

7.1 ORGANIZATION & STAFF

The SGS is adapted to the TEEPIT corporate organizational chart and to the security organizational chart with reference to the roles and responsibilities as resulting from the Security Reports and updated following organizational changes, to guarantee correct security management for prevention of major accidents and technological risks in the various phases of the activities, according to the characteristics of the Seveso sites.

The SGS-04 procedure defines the general criteria and responsibilities to identify the training, information and training needs and obligations of personnel operating in the Seveso sites at to

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promote a culture of safety at all company levels with a view to preventing activities that could potentially cause major accidents.

The personal protective equipment to be adopted for all activities in the operational areas has also been defined, according to the **SGS-16** procedure "*Management of Personal Protective Equipment*".

7.2 IDENTIFICATION & ASSESSMENT OF RELEVANT HAZARDS

The SGS provides a procedure that describes the activity of hazard identification and risk assessment of major accidents (**SGS-07 Hazard identification and risk assessment of major accidents RIR**) for:

- identify all sources of danger;
- evaluate the risk in terms of probability and severity;
- adopt technical, procedural, and organizational measures to reduce risk.

Results of the identification and assessment of the risks of major accidents are summarized in the Seveso Safety Report, drawn up in collaboration with a specialized external consultant, and constitute the fundamental reference for the definition and implementation of the SGS.

The Safety Report is based on an analysis of the dangerousness of the substances and the process, evaluating the risks and identifying the Top Events (accident scenarios with a probability of occurrence $> 10^{-6}$).

In addition to the Safety Report, according to the TotalEnergies guidelines, a further "Technological Risk Assessment - TRA" document is available which identifies the Major Accidents, i.e. those accident scenarios that have catastrophic or disastrous consequences (with reference to the company risk matrix).

The Top Events (Seveso) and the Major Accidents (TRA) are included in the "Major Risks Register".

The methodology for identifying the dangers and measures to reduce the risk of chemical agents present in the plant is described in the **SGS-15** procedure - *Management of Chemical Agents and Safety Data Sheets* which regulates the use of chemical substances and the methods for collecting, updating, and sharing the safety data sheets of the dangerous substances present in the plant.

For the purposes of preventing major accident risks, the evaluation and reporting of HSE events such as accidents, accidents, or near-accidents and operating anomalies are analysed and recorded through the **SGS-11** - *Event Management and HSE Reporting procedure*.


7.3 OPERATIONAL CONTROL

TEEPIT guarantees the operation of the systems in compliance with the Operating Manuals and the Use and Maintenance Booklets of the manufacturer which contain the instructions for controlling the processes and equipment of the LPG Centre in different operating conditions and for the management of alarms and/or trips.

Furthermore, the Operational Manuals also define the different operating conditions of the LPG Centre units, in particular the temporary stops and the start-up phases, to define the verification, testing and commissioning of critical machines and equipment.

Through the Inspection and Maintenance Plans and the **SGS-19** *Inspection and Maintenance* procedure, the criteria and methods of maintenance, inspection and periodic verification are defined to guarantee the reliability of each part of the system in relation to the safety and monitoring of the risks related to aging (corrosion, erosion, fatigue, etc.).

The criteria for authorizing these activities are established in the **SGS-14** *Work Permits* procedure.

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The **SGS-20** *Identification and management of SECE procedure for the prevention of major accident risks* describes the identification and management of plant elements (instruments, structures, appliances, pipes, etc..) identified as critical for prevention purposes of major accidents.

The control and maintenance activities on fire-fighting systems are described in **SGS-17** *Operational management of fire-fighting systems* which defines the checks to be carried out and the frequency for each fire-fighting equipment (extinguishers, hydrants, pumps, etc.) of the LPG Centre.

The choice of suppliers and contractors is established in the design and detailed engineering phase in relation to the type of supply (system, component, service, etc.) and, where applicable, adapted and revised based on operational experience, information previously collected and ascertained of their performance.

7.4 CHANGE MANAGEMENT

Technical, organizational and/or procedural changes are analysed, controlled, and verified during the design, construction and start-up phase, both for new and existing equipment.

The implementation of modifications for existing facilities and the procurement of critical equipment are developed considering relevant accident risks according to the **SGS-18** procedure. Based on this procedure, all changes, permanent or temporary to the process, to equipment, which even potentially could generate significant accidents, must be analysed, assessed, approved and recorded.

The evaluation of changes is commensurate with their extent and importance and can be a simple verification of compliance with regulations or good engineering standards, or require safety studies: HAZID, HAZOP, Declaration of (non) increase in risk, project evaluation, etc. (**SGS-07**). Before commissioning, a check must be carried out in the pre-start phase on the implementation of the change and on the information and training of the affected personnel (**SGS-18**).


As better detailed in the **SGS-18** procedure, plant modifications and the correct authorization process are guaranteed by the Production Management through the Process Methods Department.

Organizational changes are also included in the SGS-18 procedure and are subject to an assessment of the risks introduced and the adoption of appropriate actions to mitigate any exposure to additional risks.

7.5 EMERGENCY PLANNING

The Internal Emergency Plan of the LPG Centre contains the following information:

- accident scenarios derived from the Safety Report with a frequency of occurrence $> 10^{-6}$ and those with catastrophic to disastrous consequences deriving from the Technological Risk Assessment;
- description of the function of the staff who cover the different roles in the crisis cells for emergency management.
- indication of the function of the person in charge of liaising with the authority responsible for the External Emergency Plan;
- description of the measures to be adopted to deal with emergency situations and limit their consequences, including fire-fighting equipment and available resources;
- alarm systems and the rules of conduct to be observed for the different alert levels;

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- training to prepare staff for the tasks they will carry out.

TEEPIT's emergency management is based on the criteria of the IMS - Incident Management System. The IMS allows the organization to manage the emergency through the upgrade and systematic activation of 4 crisis cells with a defined chain of command to ensure a direct link between the incident management objectives and the response actions adopted in the field:

- an "Advanced Command Post on the Site" (ACP - Advanced Command Post) for the on-site operational management of the emergency situation;
- an "Incident Command Post" (ICP - Incident Command Post) for command in the management of the emergency situation (tactical management);
- a "Crisis Management Cell" (CMC - Crisis Management Cell) for the management of corporate interests (strategic management).

If emergency management requires skills and resources not available in TEEPIT, the CMC crisis cell contacts the Crisis Support Cell (CSC) of the TotalEnergies Group.

The External Emergency Plan for the LPG Centre plant is prepared, updated and implemented by the Prefect as described in the SGS-08 procedure and can be consulted at the following link:

[Piani Emergenza Esterna delle industrie a rischio di incidente rilevante | Prefettura - Ufficio Territoriale del Governo di Potenza](#)

The measures to be adopted by the population are described in the "Information sheets on the risks of major accidents for citizens and workers".

The updating of the Internal Emergency Plans and emergency management procedures occurs following organizational changes, feedback from exercises or following the review/addition of accident scenarios, which influence the emergency response.

Pursuant to Legislative Decree. 105/2015 at least every three years the Gestore, with the support of the HSSE Direction, reviews the Internal Emergency Plans after sharing with the RLSA and the long-term contractors as required by Ministerial Decree 138 of 05/26/2009.

7.6 PERFORMANCE CHECK

The effectiveness of the Policy and the safety management system in achieving the objectives is assessed through the examination of efficiency indicators and audit reports, as described in the **SGS-03** procedure "*Objectives, targets and improvement program*".


Annually, a documented periodic verification of the effectiveness of the Policy and the SMS for the prevention of major accidents is carried out through the annual review of the Gestore as detailed in the **SGS-12** procedure and in the relevant meeting minutes and improvement plans of the SGS.

The achievement of the objectives is assessed through the performance indicators defined and measured periodically according to the **SGS-09** procedure "*RIR efficiency indicators*".

7.7 CONTROL & REVIEW

The periodic and systematic evaluation of the application of the Major Accident Prevention Policy and of the effectiveness and adequacy of the SGS in relation to the objectives and legislative provisions allows the system itself to be optimized over time.

This assessment is carried out from an operational point of view during daily activity and in a systematic and documented manner through periodic internal and/or external safety audits.

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Internal audits aimed at continuous improvement of the SGS system are better detailed in the **SGS-10** procedure and reported in the annual audit plan.

Added to these are the audits provided for by the Legislative Decree. 105/2015, i.e. the inspection visits which take place with a frequency dictated by the decree itself and included in the annual audit plan.

Any non-conformities relating to the SGS (which may derive from accidents or near-accidents, accidents, anomalous or critical process situations, etc.) are reported, assessed and managed with appropriate corrective actions (technical, procedural, organizational, etc....) and implemented in a planned, documented and controlled manner.

Corrective actions: non-conformities and observations deriving from inspection visits, from HSE events from anomalous process situations can be of a technical, procedural and organizational nature.

The priorities, necessary resources and responsibility for implementation are defined in the relevant timetables.


The activities relating to the management of non-conformities and corrective actions are described in the **SGS-11** procedure.

8. SGS IMPROVEMENT PLAN

The implementation and improvement program issued as an output of the Gestore's annual review and reported in the attachment to this Document, is drawn up based on the regulatory needs and the general and specific objectives reported in the previous paragraphs, in order to guarantee compliance with current legislation.


Particular attention is paid to the definition of objectives that can reduce the type, number, frequency, and magnitude of accidental events hypothesized for the plant.

These objectives can also derive from the analysis of operational experience or REX and the trend of performance indicators, to identify the most suitable areas of intervention for the company reality.

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9. ATTACHMENT A – LIST OF PROCEDURES SGS

| ELEMENT | TITLE | CMS CODE |
|---------------|--|----------------|
| SGS-01 | HSE management system manual | 1-PR-HSE-02 |
| SGS-02 | Compliance, monitoring & Update of prescriptions and Legislation | PR-2-HSE-01-01 |
| SGS-03 | Objectives, Targets and improvement program | 2-PR-QHSE-015 |
| SGS-04 | Management of awareness, information and training for HSE | 2-PR-QHSE-016 |
| SGS-05 | Internal/External Communication in HSE & RIR matters | 2-PR-QHSE-017 |
| SGS-06 | Management and control of documentation and recording in HSE & RIR | 2-PR-QHSE-018 |
| SGS-07 | Hazards Identification and Major Risks Assessment | PR-2-HSE-04-02 |
| SGS-08 | Affiliate Emergency Response System | 2-PR-QHSE-019 |
| SGS-09 | Monitoring, measurement and performance indicators | 2-PR-QHSE-020 |
| SGS-10 | Management of HSE & Operational Audits | PR-2-HSE-11-01 |
| SGS-11 | HSE events and incident reporting | 2-PR-QHSE-013 |
| SGS-12 | Gestore Review | 2-PR-QHSE-021 |
| SGS-13 | HSE policy for supplier and contractor management | PR-2-HSE-07-01 |
| SGS-14 | Work Permit | PR-2-HSE-03-04 |
| SGS-15 | Management of chemical substances and MSDS | 3-PR-QHSE-020 |
| SGS-16 | Management of Personal Protection Equipment | 3-PR-QHSE-010 |
| SGS-17 | Firefighting Operational Management | 3-PR-QHSE-021 |
| SGS-18 | Management of change | 3-PR-HSE-002 |
| SGS-19 | Inspection & Maintenance | 3-PR-QHSE-022 |
| SGS-20 | Safety & Environmental Critical Barriers Identification & Performance Management | 3-PR-QHSE-023 |
| SGS-21 | Personnel access in Tempa Rossa Areas | 3-PR-QHSE-018 |

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10. ANNEX B – SAFETY, HEALTH, ENVIRONMENT, QUALITY AND ENERGY CHARTER

Safety, health, environment, quality and energy charter

In accordance with its Code of Conduct, TotalEnergies EP Italia has adopted the following principles concerning safety, security, health, the environment, quality, energy and societal commitment:

- 1.** TotalEnergies EP Italia holds safety, security, health, respect for the environment, energy efficiency and customer satisfaction, listening to all stakeholders by way of an open dialogue, as paramount priorities.
- 2.** TotalEnergies EP Italia complies with all applicable laws and regulations wherever it conducts its business and supplements them with specific requirements and commitments when necessary.
- 3.** TotalEnergies EP Italia promotes, among its employees a shared culture which the core components are professionalism, the rigorous compliance and application of regulations, skills management, incident reporting, feedback and continuous learning in order to avoid recurrence. This approach relies on the vigilance and commitment of all.
- 4.** Each and every team member, at all levels, must be aware of their role and personal responsibility in the practice of their duties. Individuals must demonstrate the strictest discipline in preventing accidents and deliberate damage; in protecting health, the environment, product and service quality and in reduction of energy consumption whilst addressing stakeholder expectations. Rigor and exemplarity in these fields are important criteria in evaluating the performance of each member of personnel, in particular for those in positions of responsibility.
- 5.** TotalEnergies EP Italia favors the selection of industrial and business partners on the basis of their ability to apply policies similar to its own concerning safety, security, health, the environment, quality, energy and social responsibility. In the selection of contractors and suppliers, TotalEnergies EP Italia ensures that the obligations and responsibilities are defined and respected for the entire duration of the contract, the related activities are carried out in line with the Company's HSEEQ policy, and the procurement favors products and energy efficient services which contribute to the improvement of energy performance.
- 6.** TotalEnergies EP Italia implements, for all of its operations, appropriate management policies and procedures regarding safety, security, health, the environment, quality, energy, social responsibility and a periodic risk assessment of relevant policies and measures. Any development of a project or launch of a product is undertaken upon full life-cycle risk assessment.
- 7.** Appropriate management systems for personnel and process safety, health, environmental, quality, energy and social responsibility for each business undergo regular assessment involving measurement of performance, setting targets, formulating relevant action plans and implementing suitable control procedures, with the goal of improving the Company's performance in each of these areas and continuously improving the management systems themselves. TotalEnergies EP Italia provides information and resources necessary to achieve these objectives.
- 8.** TotalEnergies EP Italia implements and periodically update, emergency response plans, internal or external (in cooperation with local Authorities) and means of intervention designed to face different types of events it may encounter. Such measures are periodically tested and reviewed during exercises.
- 9.** TotalEnergies EP Italia in line with sustainable development goals is committed to managing and contain, its energy consumption, emissions in natural environments (water, air and soils), production of final waste, use of natural resources and mitigate the impact on biodiversity, promoting awareness, education and research programs for the community. It develops new processes, products and customer services in order to enhance energy efficiency and reduce environmental footprint.
- 10.** TotalEnergies EP Italia adopts a constructive attitude towards safety, security, health, the environment, quality and energy based on transparency and an open dialogue with stakeholders and outside parties. Through its social responsibility commitment, TotalEnergies EP Italia is particularly keen on contributing to the sustainable development of neighboring communities, with a focus on human, economic and social responsibility issues. It conducts its operations in such a way as to responsibly ensure security, in compliance with the Voluntary Principles on Security and Human Rights (VPSHR).

Philip CUNNINGHAM
Managing Director

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11. ANNEX C - MINUTES OF SHARING THE BIENNIAL UPDATE OF THE POLICY DOCUMENT WITH THE RLSA



TotalEnergies EP Italia
Direzione HSSE

Prof. 948/24

Guardia Perticara, 29.08.2024

OGGETTO: Verbale di avvenuta consultazione dei Rappresentanti dei Lavoratori per la Sicurezza e l'Ambiente (RLSA) per l'aggiornamento biennale del Documento di Politica per la prevenzione degli incidenti rilevanti per lo Stabilimento Centro GPL "Tempa Rossa" (1-PO-QHSE-003) e la Politica in formato una pagina (0-CHA-HSE-002), come previsto dall'Art.14_punto 4 del D.lgs. 105/2015.

In data 21 agosto 2024 il Documento di Politica per la prevenzione degli incidenti rilevanti per lo Stabilimento Centro GPL "Tempa Rossa" (1-PO-QHSE-003) nell'ambito della sua revisione biennale, come previsto dall'Art.14_punto 4 del D.lgs. 105/2015, e la Politica in formato una pagina (0-CHA-HSE-002) sono stati resi disponibili in bozza ai Rappresentanti dei Lavoratori per la Sicurezza e l'Ambiente via e-mail per eventuali commenti e integrazioni.

I Rappresentanti dei Lavoratori per la Sicurezza e l'Ambiente *hanno completato in data 29 agosto 2024 la consultazione del documento ed espresso il loro parere favorevole via e-mail, senza richieste di modifiche ed integrazioni.* Si procede quindi a finalizzare l'aggiornamento dei documenti in oggetto come condiviso.

Il Gestore Seveso/Direttore HSSE
ing. Ferruccio FERRUCCI

DocuSigned by:
Ferruccio Ferrucci
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I Rappresentanti dei Lavoratori
per la Sicurezza e l'Ambiente:


Gerardo Cuoco
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Gerardo CUOCO
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Laura Leonarda Genovese
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 Società soggetta all'attività di direzione e coordinamento di TotalEnergies SE



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12. ANNEX D – SGS IMPROVEMENT PLAN FOR THE PREVENTION OF MAJOR ACCIDENTS 2024


| SGS-2024 OBJECTIVES | | | | | |
|----------------------------------|---|-------------------|---|--|--|
| BACKLOG – 2023 OBJECTIVES | | | | | |
| Seveso element | Activity | Establishment | Timing / Reasons for the delay | Updated on 8.7.2024 | IMPLEMENTATION LEADER and Actions |
| 4. Operational Control | <p style="text-align: center;">OBJECTIVE 5/2023</p> <p>DGS 42. LPG PUMP RECYCLING LINE CONFORMITY (ESDV missing). Replace the manual valves 40-HV-39270 and 40-HV-39271 with SDVs (shutdown valves) with closing action following detection of the Fire & Gas or PALL of the pump sealing oil circuit.</p> | LPG Centre | <p>As per the 2022 Plan and 2023 Plan backlog. <i>Rescheduled for Q3/2024.</i></p> <p><u>JUSTIFICATION FOR DELAY</u> Not conducted during FFSD 2023 as it was not possible to completely empty the LPG storage tanks and carry out the activity safely. In addition, a new solution was proposed in parallel.</p> | <p style="text-align: center;">Progress 40%</p> <p>- engineering completed. - material arriving week 34 for final installation.</p> | <p>➤ FOPS DIRECTOR Leader: I. Rea Action: Ref. RFM_TR_22_069 LPG.</p> |
| 4. Operational Control | <p style="text-align: center;">OBJECTIVE 6/2023</p> <p>DGS 40 – Fireproofing (passive fire protection). Proceed with budget and corrective action planning per Carboline inspection report “CC21313_OC FIREPROOFING_070621_ADC”</p> | Oil Centre | <p>As per the 2022 Plan and the 2023 Plan backlog, the activity has been rescheduled as follows as per the budget plan:</p> <p><i>Phase 1– FFSD 23, completed fire-Proofing equipment supports.</i> <i>Phase 2 –Call for Tender and tender assignment.</i> <i>Phase 3 -Completion of tasks.</i></p> | <p>Phase 2 (Progress 60%): - Q4/2023 start of CFT (Call for Tender); - tender assignment expected for Q3/2024.</p> <p>Phase 3 -Start of activity expected in October 2024 and completion in Q1/2025.</p> | <p>➤ FOPS DIRECTOR/ ENGINEERING & CONST DEPARTMENT Leader: C. Bove Action: Phases 2-3.</p> |

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SGS-2024 OBJECTIVES

BACKLOG – 2023 OBJECTIVES


| Seveso element | Activity | Establishment | Timing / Reasons for the delay | Updated on 8.7.2024 | IMPLEMENTATION LEADER and Actions |
|---|--|--|---|---|---|
| 3. Identification and Assessment of Relevant Hazards | <p style="text-align: center;">OBJECTIVE 7/2023</p> <p>New and complete DRA (Detailed Risk Assessment) in accordance with the Major Risks Prevention Policy as per CR-GR-HSE-301 & GS-GR-HSE-312, as an integral part of the five-year review of the TRA (Technological Risk Assessment) , with subsequent development of bow-ties and major risk registers (see SECE).</p> | <p>Oil Centre LPG Centre</p> | <p style="text-align: center;"><i>Rescheduled for Q2/2024</i></p> <p><u>JUSTIFICATION FOR DELAY</u> Activity started in January 2023 and not completed as per the original plan since the Consultant was also involved in the Seveso Istruttoria for the Oil Centre and LPG Centre and SGS Inspection for the LPG Centre.</p> | <p>COMPLETED 100% DRA study finalized on 10.4.2024.</p> | <p>➤ HSE MANAGEMENT Leader: V. Arculeo Action: Finalize the DRA document.</p> |

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| SGS 2024 OBJECTIVES | | | | | |
|---|---|--------------------------|--|--|--|
| Seveso element | Activity | Establishment | Timings | Update as of 8.7.2024 | IMPLEMENTATION LEADER and Actions |
| 3. Identification and Assessment of Relevant Hazards | <p style="text-align: center;">OBJECTIVE 1/2024</p> <p>LPG Loading Arms Improve the configuration of the LPG loading arms and the LPG loading procedure as per the feedback received from the Authorities:</p> <ul style="list-style-type: none"> - LPG Centre Istruttoria Report. - P4 Audit Seveso SGS requirement (art. 27 of Legislative Decree 15/2015). | <p>LPG Centre</p> | <p>Action 2:</p> <ul style="list-style-type: none"> - <i>Engineering completed, prefabrication of new LPG loading arms => Q3/2024;</i> - <i>On-site implementation for exercise => Q4/2024-</i> | <ul style="list-style-type: none"> ➤ ACTION 1 COMPLETED 100%: - Updated LPG loading procedure. - Risk analysis of the new configuration of the LPG loading arms conducted. ➤ ACTION 2: - Engineering completed, prefabrication of new LPG loading arms (80% progress). - On-site implementation for operation. | <ul style="list-style-type: none"> ➤ FOPS DIRECTOR / ENGINEERING & COST DEPARTMENT Leader: I. Rea Action 1: - Updated procedure (1 March 2024). - Risk Analysis for LPG loading arms as per current configuration, carried out (30 April 2024). Leader: C. Bove Action 2: - New configuration for LPG loading arms to be engineered and tested on site. - On-site implementation. |
| 4. Operational Control | <p style="text-align: center;">OBJECTIVE 2/2024</p> <p>Create protection for the nitrogen cylinder packs located in U39-Area A at the LPG Centre, in case they are impacted by accident scenarios.</p> <ul style="list-style-type: none"> - LPG Centre Istruttoria (MEMO 20.12.2023,6.2.2024). | <p>LPG Centre</p> | <p>Q3/2024</p> | <p style="text-align: center;">Progress 50%</p> <p>Waiting for a response from the authorities. Various solutions were explored (protection or relocation of the nitrogen cylinder pack).</p> | <ul style="list-style-type: none"> ➤ FOPS DIRECTOR Leader: I. Rea Response to the Authorities: to protect the nitrogen cylinder packs in case they may be impacted by accident scenarios, hydrants/monitors are available in the area. Possible response from the Authorities: you may be required to protect or relocate nitrogen cylinder packs. |

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| SGS 2024 OBJECTIVES | | | | | |
|-------------------------------|---|-------------------|----------------|---|---|
| Seveso element | Activity | Establishment | Timings | Update as of 8.7.2024 | IMPLEMENTATION LEADER and Actions |
| 4. Operational Control | <p>OBJECTIVE 3/2024 Inspection campaign for the hoses that connect the monitoring hydrants to the foaming liquid tank and for the level indicators attached to the tanks.</p> <p>- Oil Centre Istruttoria (MEMO 16.1.2024, 23.1.2024).</p> | <i>Oil Centre</i> | <i>Q3/2024</i> | <p style="color: green;">COMPLETED 100%</p> <p style="color: green;">- All the hoses that connect the monitoring hydrants to the foam tanks have been inspected and any damaged ones have been replaced.</p> <p style="color: green;">- The foam fluid level indicators have been inspected.</p> | <p>➤ FOPS DIRECTOR Leader: I. Rea Action: inspection of flexible hoses and level indicators.</p> |
| 4. Operational Control | <p>OBJECTIVE 4/2024 Inspection campaign for the fire prevention system.</p> <p>- Oil Centre Istruttoria (MEMO 16.1.2024, 23.1.2024).</p> | <i>Oil Centre</i> | <i>Q3/2024</i> | <p>Progress 80%</p> <p>- fire system inspection completed in Q2/2024.</p> <p>- Wet test (60%)</p> | <p>➤ FOPS DIRECTOR Leader: I. Rea Action: Inspection campaign for the fire prevention system and "wet test".</p> |
| 4. Operational Control | <p>OBJECTIVE 5/2024 Restore the burial cover of buried out-of-spec LPG and propane tanks.</p> <p>- Oil Centre Istruttoria (MEMO 16.1.2024, 23.1.2024).</p> | <i>Oil Centre</i> | <i>Q3/2024</i> | <p>Activities and corrective actions defined on the intervention to be carried out by the Engineering and Construction Department in coordination with the Director of Operations.</p> | <p>➤ FOPS DIRECTOR Leader: I. Rea Action: Restore the burial cover of buried out-of-spec LPG and propane tanks.</p> |

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| SGS 2024 OBJECTIVES | | | | | |
|-------------------------------|---|----------------------------------|----------------|--|--|
| Seveso element | Activity | Establishment | Timings | Update as of 8.7.2024 | IMPLEMENTATION LEADER and Actions |
| 4. Operational Control | <p>OBJECTIVE 6/2024 Implement visual flammable gas alarm in Area G1. Check the activation of the toxic gas visual alarm in area D. - Oil Centre Istruttoria (MEMO 16.1.2024, 23.1.2024).</p> | <i>Oil Centre</i> | <i>Q3/2024</i> | <p>Progress 20% - Area D: toxic gas alarm lamp replaced. - Organization of the test campaign underway to verify the correct activation of the F&G visual alarm in all areas of the Oil Centre as per the C&E Matrix and implementation of the flammable gas alarm in Area G1.</p> | <p>➤ FOPS DIRECTOR Leader: I. Rea Action: Test campaign to verify the correct activation of the F&G visual alarm in all areas of the Oil Centre as per the C&E Matrix.</p> |
| 4. Operational Control | <p>OBJECTIVE 7/2024 Implement adequate horizontal signs for the area dedicated to the discharge of propane via tank trucks (as Oil Centre Istruttoria, MEMO 16.1.2024) and in addition to the gas compressor areas (Units 37, 30-31)</p> | <i>Oil Centre</i> | <i>Q3/2024</i> | <p>Progress 50% Inspection carried out, the type of signage to be adopted defined. Start of work for the implementation of signs on site scheduled for week 30..</p> | <p>➤ FOPS DIRECTOR/ENGINEERING & CONST DEPARTMENT Leader: I. Rea Action: implement adequate horizontal signs.</p> |
| 6. Emergency planning | <p>OBJECTIVE 8/2024 Campaign to restore the signs to the fire prevention system equipment. - Oil Centre Istruttoria (MEMO 23.1.2024).</p> | <i>Oil Centre LPG Centre</i> | <i>Q3/2024</i> | <p>COMPLETED 100% Restoration of fire signs completed on 30.6.2024.</p> | <p>➤ FOPS Director / HSE Spdt Leader: I. Rea Action: Restoration of fire prevention signs (also for fire extinguishers, fire hydrants and monitor hydrants indicate the tag as shown in the fire prevention layouts of the Oil Centre and the LPG Centre).</p> |

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| SGS 2024 OBJECTIVES | | | | | |
|----------------------------|---|---|----------------|---|---|
| Seveso element | Activity | Establishment | Timings | Update as of 8.7.2024 | IMPLEMENTATION LEADER and Actions |
| 2. Training | <p style="text-align: center;">OBJECTIVE 9/2024</p> <p>Improve mandatory Seveso training (quarterly sessions).</p> <p>- P1 requirement as per the final SGS inspection report of the LPG Centre (Art. 27 of Legislative Decree 15/2015).</p> | <p><i>Oil Centre</i></p> <p>LPG Centre</p> | Q4/2024 | <p style="text-align: center;">Progress (50%)</p> <p>- First module made available on SicurPoint on March 27, 2024.</p> <p>- Second module made available on SicurPoint on 25 June 2024.</p> <p>In parallel, launch an alert/email system to the relevant managers for each company team or third-party companies.</p> | <p>➤ HSE DIRECTION/ HSE TRAINING COORDINATOR Leader: A. Muscillo</p> |

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13. ANNEX E – LPG CENTRE SAFETY ORGANIZATION CHART

