principia

Operational Standard no 608

Version no1 dated 24/04/2024

HEALTH, SAFETY AND ENVIRONMENTAL TERMS AND REQUIREMENTS

THE HEAD OF HSQ

INDEX

1 SCOPE 3
2 RECITALS 3
3 DEFINITIONS AND ACRONYMS 3
4 GENERAL OBLIGATION ON OCCUPATIONAL LAW, HEALTH, SAFETY AND ENVIRONMENT 6
5 HEALTH AND SAFETY PLAN AND FOLDER 7
6 ENVIRONMENTAL MANAGEMENT PLAN 10
7 HSE ORGANIZATION AND RESPONSIBILITY 11
8 PROVISIONS CONCERNING FIRST AID, FIRE PREVENTION AND EMERGENCY MANAGEMENT. 12
9 HSE AWARENESS AND TRAINING 12
10 PROTECTION OF THE ENVIRONMENT 14
11 REPORTING 17
12 SUBCONTRACTORS 18
13 SPECIAL REQUIREMENTS FOR COMPLEX WORKS 19
14 DOCUMENTATION AND INFORMATION TO BE PROVIDED BY THE CONTRACTOR 19
15 HSE REQUIREMENTS FOR ACTIVITIES 20
16 INSPECTION AND MONITORING 34
17 CONSEQUENCES OF BREACHES REGARDING HEALTH, SAFETY AND ENVIRONMENTAL REQUIREMENTS 35
APPENDIX 1 FOCUS ON COMPLEX WORKS ACTIVITIES 47
APPENDIX 2 SANCTIONS FOR HSE VIOLATIONS 48
ANNEX A- MINIMUM REQUIREMENTS FOR TEMPORARY ELECTRICAL INSTALLATIONS OF WORKSITE (ATTACHED) 48
ANNEX B - MINIMUM REQUIREMENTS FOR EXCAVATED SOIL AND ROCKS MANAGEMENT AT WORKSITES (ATTACHED) 48
ANNEX C - MINIMUM REQUIREMENTS FOR MANAGING AREAS OF WASTE/MATERIAL REMAINING AT WORKSITES (ATTACHED) 48
ANNEX D - MINIMUM REQUIREMENTS FOR WASHING OF VEHICLES AT WORKSITES (ATTACHED) 48
ANNEX E - MINIMUM REQUIREMENTS FOR REFUELLING OF VEHICLES AND MACHINERY AT WORKSITES (ATTACHED) 48
ANNEX F - MINIMUM REQUIREMENTS FOR WORKS AT NIGHT IN WORKSITES (ATTACHED) 48

1 SCOPE

These Health, Safety and Environmental Requirements and Terms govern the Parties obligations in connection with health,safety and environment matters in the relationship between Principia Energy and its Contractors.

2 RECITALS

2.1 This document provides Contractor's obligations concerning significant health, safety and environmental aspects that the Contractor shall and shall cause its Subcontractors to comply with during performance of scope of Contract.

2.2 The obligations reported in this document shall be considered as contract conditions and if these conditions are not met by Contractors and/or its Subcontractors, consequences as per Section 17 herein are applied by Principia Energy to Contractors. For Subcontractors, Principia Energy requests to the Contractors to provide evidences of related remedies application.

2.3 Contractor shall use and cause its Subcontractors to use this information to develop suitable and sufficient Health, Safety and Environmental documentation, identifying the Health, Safety and Environmental measures to be implemented during the contractual activities performance and defining the relevant costs, maintaining a safe and neat facility, promoting best practice in Health, Safety and Environmental management. Every requirement included in this document must be implemented when the specific hazard exists.

2.4 In Principia Energy, no work can be done compromising Health & Safety and/or environment. For this reason, as established in the Stop WorkPolicy, any risk situation or unsafe behaviour will determine the suspension of work and the restoration of Health, Safety and/or environmental conditions.

2.5 Principia Energy is strongly and constantly engaged in promoting and consolidating a culture of health, safety and environment protection. Such commitment is further detailed in the " Health and Safety Policy", "Stop Work Policy" and "Environmental Policy"

3 DEFINITIONS AND ACRONYMS

"Accident": means the Incident that has given rise to injury, with absence from work of at least one day[1], excluding the one of the occurrence.

"Affiliates": mean, with respect to any legal entity, any legal entity directly or indirectly controlling, controlled by or under common Control with, such other legal entity, but such legal entity shall be deemed to be an Affiliate only so long as such control exists. Control, with respect to any legal entity, means the possession, directly or indirectly, of the power to direct or cause the direction of management and/or policies of such legal entity, whether (i) through the ownership of voting securities entitling to the right to elect or appoint, directly or indirectly, the majority of the board of directors, or a similar managing authority, (ii) by contract or (iii) otherwise.

"Commuting Incident": means a specific Incident occurring during transfer from personnel home to workplace and vice-versa or, when the organization allows workers eating their meals outside the organization's premises, during transfer to and from the place where meals are consumed.

"Complex Work": means a work activity involving (or performed by) more than one party (Principia Energy /Contractor) - which may or may not work simultaneously at the Work Site - or more than one working group of a single party (Principia Energy /Contractor), depending on the HSE Plan and according to the following (indicative and non-exhaustive):

- High number of Personnel at the Work Site,
- complexity of involved installations and/or construction sites,
- proximity of third parties within the Work Site.
- other projects on the vicinity areas that could be impacted by the works

"Contract": means the contract entered into between a Contractor and Principia Energy to which these HSE Terms are attached.

"Contractor": means natural or legal person or groups of the latter with whom Principia Energy signs Contracts for works and/or services and/or supplies. "Principia Energy": means the particular entity (whether Principia Energy S.p.A. directly or one of its Affiliates) that is a party to the Contract signed with the Contractor.

"Environmental Event": means the occurrence or the modification of a particular set of circumstances which has caused or could have caused an impact on the environment and / or on organization due to environmental problems.

"Environmental Near Miss": means an unexpected environmental event confined or ended before reaching any environmental matrix and producing any potential impact.

"Equipment": means any assembly of items intended to be used by Personnel with the aim of executing a specific work activity.

"First Aid": means an incident that has given rise to injury that requires a medical treatment in a medical facility or the use of a first aid kit, with return to work within the same day or shift to the day after. First Aids are classified by dynamic / potential damage in order to effectively targeting improvement actions to enhance occupational safety.

"Foreman": means a person who supervises the work and ensures the implementation of instructions issued, ensuring correct job execution by workers in compliance with health, safety and environmental regulations and Principia Energy rules. This person is a nominated person in control of a work activity.

"Frequency Rate" or "Lost Time Injury Frequency Rate" : (number of Accidents/worked hours) x 1.000.000.

"Government Authority": means any national, federal, state, local, municipal or other governmental, regulatory body, administrative, judicial, public or statutory instrumentality, court or governmental tribunal, agency, commission, authority, body or entity, or any political subdivision thereof, other entity exercising executive, legislative, judicial, taxing, regulatory or administrative powers or functions of or pertaining to government (including any supra-national body exercising such powers or functions, such as the European Union).

"Hazard": means a source with a potential to cause Injury, Ill Health and Environmental Event. Hazards can include sources with the potential to cause harm or hazardous situations, or circumstances with the potential for exposure leading to Injury, Ill Health and Environmental Event.

"Hazardous Substances": means any and all substances now or at any time subject to regulation, control, remediation or otherwise addressed under applicable Law, including Laws relating to the discharge, emission, spill, release, or threatened release into the environment or relating to the disposal (or arranging for the disposal), distribution, manufacture, processing, storage, treatment, transport, or other use of such substances. Hazardous Substances include, but are not limited to, chemicals, constituents, contaminants, pollutants, materials, wastes, any other carcinogenic, corrosive, ignitable, radioactive, reactive, toxic or otherwise hazardous substances or mixtures - whether solids, liquids, gases. Hazardous Substances can cause Injury or Ill Health

"HSE": means Health, Safety and Environment.

"HSE Terms and Requirements": means documents and/or requirements (relevant to HSE) that complements this "HSE Terms and Requirements" and contains project specific HSE obligations, generally included in Principia Energy Technical Specifications and/or in a document that details Particular Conditions which is an annex to the Contract.

"Incident": means an unplanned and undesired event in which an injury or ill health occurred or could have occurred. Furthermore, Incidents are classified as follows:

- Accident
- First Aid
- Near Miss.

"Injury and Ill Health": means an adverse effect on the physical, mental or cognitive condition of a person. These adverse effects include occupational disease, illness and death. The term "Injury and Ill Health" implies the presence of injury or ill health, either on their own or in combination.

"Interference" or "Work interference": means a work activity where different subjects (Principia Energy /Contractors) work at the same Work Site:

- at the same time, with a direct effect on the surrounding activities,
- at different times, if the effects of activities performed by the subject working before affect the subject working afterwards.

"Law": means all legislation, statutes, ordinances, codes, rules, orders, decrees, judgments, injunctions, permits, licences, authorizations of any legally constituted Governmental Authority, as the same may be amended, modified or repealed.

"Minor Accident": An accident that result in an absence of less than 30 days absence from work.

"Non Conformity": means any breach or deviation in fulfilling what established by a Requirement.

"Parties": means jointly Principia Energy and Contractor/Subcontractors.

"Personnel": means any individual performing activities related to the Contract that are under the control of the Contractor or of a Subcontractors regardless of the particular legal arrangement for such activities (i.e. whether employees, individuals working as independent contractors, agents, representatives etc.).

"PPE" means Personal Protective Equipment

"Fatal Accident (FAT ACC): An Accident that has caused the death of a person.

"Severe Accident": An accident that result in an absence of more than 30 days absence from work

TABLE 1 – Examples of Severe HS Accidents

Injury	Example of damage
Spinal and back damage	○ Reduction of mobility ○ Permanent reduction of sensitivity
Paralysis	○ Any degree of paralysis
Amputations	○ Limb loss ○ Loss of a hand / foot

Serious burns	○ Second- and third-degree burns with permanent consequences on the normal function of organs or the appearance of the injured person (social impact on the person's life)
Permanent loss or reduction of one of the senses	○ Sight loss/reduction ○ Hearing loss/reduction ○ Other sense loss/reduction
Brain and head injury	○ Permanent cognitive, memory or mobility problems ○ Deformation, or the permanent face scarring
Permanent damages to internal organs	○ Any permanent damages to internal organs

"High Potential Near Miss (HPO NM)": A Near Miss whose dynamic could have resulted in a Severe Accident or in a Fatal Accident.

TABLE 2 – Examples of HIPO Health Safety Events

Typology (type/subtype)	**Dynamics descriptions**
Fall from Height	Free fall through holes, Fall from ladders, Fall from scaffolding and temporary platforms, Fall from slopes/ditches, Fall from structures, cranes, etc, Fall from high into rivers, lakes, canals etc. with a difference in height of two meters
Falling Objects	Fall of objects (equipment, material, tools or debris) with energy that can cause significant damage to a person, during lifting or movement or other activities and in general falling objects from above (even if no activities are ongoing), on a workplace or adjoining areas. Adjoining areas could include a public path, a road, a square or the courtyard of a home or other building next to a workplace.
Entrapment	Entrapment which may be caused by hand tools, Entrapment caused by mechanisms of machines, Entrapment caused by objects, Entrapment caused by moving mechanisms, Entrapment caused by Heavy-Vehicle use (rollover and unloading). Entrapments may also be caused by detachment of permanent mountings, detachment of walls/slopes, collapse of walls/slopes, collapse of trenches and galleries whose consequence could have been an amputation or worse
Thermal Contacts	Contact with fluids or hot/cold substances or contact with sources of heat/cold or contact with hot/cold projected materials or contact with hot/cold surfaces whose energy that can cause significant damage
Chemical agents	Contact with or exposure to chemical products harmful for type or concentration
Explosion	Exposure to direct effects of explosions.
Electrical	Direct contact, Indirect contact, Electric discharging (inductive/capacitive) and Electric arc
Confined spaces	Accidents/incidents happened in closed areas with low-oxygen atmosphere, with risk of unexpected movements of parts or machinery or flood by fluids, underwater works, flammable atmosphere (fire or explosion) or toxic atmosphere
Ionizing Radiations	Exposition to any type of particle or electromagnetic wave that carries enough energy to ionize or remove electrons from an atom

"Requirement": means a need or expectation that is stated in the Contract or obligatory by Law.

"Safety Observation": means a behaviour or situation in relation to which no incident occurred but which could contribute to an Incident. Safety Observations are divided into Unsafe Behavior and Unsafe Situation. Differently from Near Misses, Safety Observations have not the characteristic of 'dynamicity' of something that happens in a given place at a given time.

"Near Misses are classified by dynamic / potential damage in order to effectively target improvement actions to enhance occupational safety. According to the above principle, Near Misses are classified as follows:

"Stop work": means an event where Principia Energy "Stop Work" policy, or equivalent policy, has been applied

"Subcontract": means a contract with which the Contractor entrusts the execution of contractual services to other parties.

"Subcontractor": means natural or legal person or groups of the latter with whom the Contractor signs Subcontracts for works and/or services and/or supplies executed in a Work Site.

"Work Site": means any temporary or permanent site, office, workplace, asset or area where a work, delivery of components, equipment or material or service execution is to be, is being, or has been carried out by Contractor on behalf of Principia Energy.

"Worker": see Personnel.

4 GENERAL OBLIGATION ON OCCUPATIONAL LAW, HEALTH, SAFETY AND ENVIRONMENT

4.1 CONTRACTOR HSE REPRESENTATIONS & WARRANTIES

- Contractor represents and warrants that:

a) the information provided by it to qualify as a supplier to Principia Energy and to enter into the Contract, including in particular information on its HSE performance and qualifications, was true and correct when given and that no material change has rendered that informationsubstantially incorrect or misleading,

b) it has in place, or will timely put in place, before commencement of Contract activities, adequate management systems, procedures, and practices and adequately qualified Personnel to ensure that it can fulfil its HSE obligations under the Contract.

4.2 GENERAL HSE OBLIGATIONS

- Contractor undertakes to perform its obligations under the Contract in such a manner as to ensure a healthy and safe Work Site for its Personnel, Principia Energy's Personnel and third parties and avoid damage to the environment, and to this end Contractor shall:

a) comply with applicable Law in matters of social security or workers compensation insurance, health and safety at work and protection of the environment,

b) comply with any applicable HSE permits related to the Work,

c) comply with these HSE Terms and Requirements and other HSE obligations set out in the Contract,

d) cooperate with Principia Energy and others (other contractors, authorities, etc.), seeking continuous improvement, to ensure that health, safety and the environment are protected to the maximum extent practicable during the performance of the Contract (e.g. participating in innovative projects on HSE risk prevention and mitigation),

e) give immediate information to Principia Energy on any issue regarding HSE that could impact, jeopardize, delay or interfere with the Contract activities.

- In the event of a conflict between any of the obligations of Section 4.2, Contractor shall perform the Contract in the manner that maximizes protection to health, safety and the environment and may consult Principia Energy in the event such manner is not immediately apparent.
- Notwithstanding Principia Energy's level of involvement in matters of health, safety and the environment, the Contractor remains liable for anyhealth and/or safety and/or environmental damage caused by its Personnel or its Subcontractors' fault or breach of Contract.
- Except as otherwise expressly provided in the Contract, Contractor shall be solely responsible for managing and supervising all Subcontractors and Personnel directly or indirectly employed by it and shall be solely liable for all acts, omissions, liabilities and damages caused by its Subcontractors.

4.3 SPECIFIC HSE OBLIGATIONS

- Contractor shall use Personnel employed in accordance with applicable Law and shall put procedures in place to ensure timely payment of its Personnel's remuneration and all taxes, insurance, pension and social security contributions (or workers compensation policies) related to such Personnel, as required for by Law and or by any applicable collective bargaining agreement. For the avoidance of doubt, as stipulated in the Section 3, the term Personnel includes the Personnel of Subcontractors. If the Contractor, in accordance with Contract provisions, uses Subcontractors in the performance of the Contract, the Contractor shall have procedures in place to ensure that any Subcontractor observe the obligations of this Section with respect to the Subcontractors' Personnel.
- Contractor shall observe all the health, safety and environmental rules for each Work Site, including emergency plans. To this end, Contractor shall ensure that:

(i) for Work Sites under Contractor's control and responsibility, it established and communicated adequate health, safety and environmental rules to all persons present at any time at the Work Site and put in place adequate procedures for monitoring and enforcing compliance with such rules by all such persons, or

(ii) for Work Sites under Principia Energy or third-party control and responsibility, it obtained, reviewed and communicated to its Personnel the health, safety and environmental rules applicable to such Work Sites, and put in place adequate procedures for monitoring and enforcing compliance with such rules by its Personnel.

- During mobilization to a Work Site, or within or between Work Sites, Personnel shall always respect applicable traffic code and Work Site prescription, use the seat belts (or helmets in case of bicycle or motorcycle) and drive safely. Any driver shall have any higher qualification

required as a result of a risk assessment or required by Law.

- At all Work Sites it is forbidden to smoke (except in designated smoking areas) and all Parties shall cooperate to enforce this rule.
- At all Work Sites it is forbidden to:
  a) possess or use firearms or ammunition for firearms (except for specifically designated and properly credentialed security personnel),
  b) consume or be under the influence of alcohol, narcotics or illicit psychotropic substances,
  c) consume non-prescribed medication or prescribed medication which may influence the safe undertaking of work,
  d) engage in disturbances such as fighting, illicit destruction of property etc.

  At Work Sites under Contractor's control, the Contractor must immediately remove from the Work Site any person found to violate items (a), (b), (c) or (d) of this Section 4.3, securing appropriate Law enforcement support, as needed.

  At Work Sites under Principia Energy /third parties control, Contractor shall cooperate to remove its Personnel found to violate items (a), (b), (c) or (d) of this Section 4.3.
- Contractor, where applicable, shall comply with the 5 Golden Rules regarding electrical risk:
  1. Carry out the effective shutdown of all voltage sources,
  2. Secure against re-connection and putting up monitoring signs,
  3. Verify the absence of voltage,
  4. Carry out earthing and short-circuiting,
  5. Mark and demarcate the working area and provide protection against adjacent live parts.

5 HEALTH AND SAFETY PLAN AND FOLDER

In case of E&C activities, the following should be followed:

5.1 REQUIREMENTS

- The Contractor shall deliver to Principia Energy, prior to commencement of Contract activities in any Work Site (and keep updated, for the term of the Contract), specific Health and Safety and Risk Assessment on all the activities concerned with Contract performance, identify and implement prevention and protection measures. In case of Contracts applicable to multiple Work Sites, the H&S Plan and Risk Assessment shall be customized considering the specific Work Site conditions and risks.
- The H&S Plan shall be carried out in accordance with local Law (P.D. 305/1996),and/of Section 5.2 of this document, and/or according to ISO 45001 standard (or equivalent standard, in this case Principia Energy reserves the right to approve the method), in case of conflicting requirements, the one maximizing protection of Health and Safety applies. In the event the Contractor is unable to follow the above mentioned requirements (e.g. because local Law requires a different standard), it must request a determination from Principia Energy, which will make a determination as to the standard to apply.

5.2 GUIDELINES FOR HEALTH AND SAFETY PLAN

- The H&S Plan shall contain, or is a collection of all the information required by the applicable Law, like:
  - Site Description;
  - Project Description;
  - Site Organization Chart;
  - Description of HSE Coordinator, detailing for each one the duty and the responsibility;
  - Managing of what required by this HSE requirements (i.e.: Training program, Communication system, Facilities, PPE);
  - Emergency plan (to be updated with the progress of the activity);
  - Training to all workers on the HS Plan, Environmental Plan and Emergency Plan contents;
  - Health & Safety Costs.

- Contractor and the Subcontractors shall provide all the documentation required by Law, update it whenever the activities change and keep a copy at Site, or immediately available to an inspector or during a Principia Energy inspection.
- The Contractor shall deliver to Principia Energy, prior to commencement of Contract activities (and keep updated, for the whole Contract duration), specific Health and Safety risk assessment and management plan on all the activities concerned with Contract execution, in particular the following:
  - Site Description: this should be a concise and general description of the nature, extent and locations of the work, clearly differentiating the existing works and new works. Details of the engineer, designers, contractors personnel (including Subcontractors of any tier) and major suppliers shall be listed including names, addresses, contact numbers, and scope of work; Contractors shall provide a statement covering the design criteria or design assumptions used, as they may affect the health and safety in operating, maintaining, repairing, cleaning, alteration or demolition of the works and protection of the environment. This statement shall include details on how foreseeable cleaning, maintenance and repair is to be carried out; details of features in the design to enable persons to work safely; and details of any residual Hazards in the completed work which will need taking into account in operating,

maintaining, repairing, cleaning, alteration or demolition of the works;

- Safe Work Methods Statement: Based on the Risk Assessment, Contractor shall provide method statements for all project activities. Such method statements shall detail all the activities and works sequences and explanation of supporting arrangements (permanent or temporary) required during the execution. Furthermore, in particular Contractor has to provide a list of risks associated to the specific activities, any certifications and special training for workers and the list of required PPE to be used;
- Lifting Plan: A specific plan developed by competent person for all complex hoisting/transporting operations. Plan has to include for lifting: dimensions and/or weight of the load, simultaneous use of apparatus, use of specific tools, as a minimum;
- Emergency Response Plan;
- Equipment and Materials: Contractor shall list each equipment and material used. Significant health, safety and environmental Hazards shall be identified and supplier's material safety data sheets included;
- Utilities: The designer and Contractors shall provide information on utilities, confirming locations and types cross-referenced to other documentation provided;
- Other Relevant Information: Designer and Contractor shall provide copies of any relevant information on the original Work Site and access such as investigation results, project installation certificates, commissioning results and certificates as generally required under the contract documentation;
- Personnel Medical surveillance and prescriptions (if any);
- Personnel Appointments and Trainings.

- H&S Plan shall include, where appropriate, the authorization/licenses for the use of work Equipment (machinery and equipment),

5.3 GUIDELINES FOR HEALTH AND SAFETY FOLDER

- The H&S Folder shall be carried out in accordance with requirements of Presidential Degree 305/96 article 3:
  - After the project completion the Health and Safety Folder will be accompanie Principia Energy the Project for its whole lifespan and is kept by the Project Owner
  - The Health and Safety Folder is required to provide the Project Registry, that is the As Built Drawings and Technical Description. Also, instructions and useful data concerning Health and Safety issues, which should be taken into consideration during possible future works during the whole of the project's lifespam, like maintenance, alternations, cleaning etc. Indicatively, the instructions and relevant data to the safer way of executing the various works, in order to avoid risks from the various networks (water, electrical, gas, steam etc), to fire safety etc

5.4 GUIDELINES FOR RISK ASSESSMENT

- Contractor and the Subcontractors performing any work shall, before to start and during any activity, perform risk assessments which have to be performed by competent personnel (risk assessor) appointed in writing by Contractor. The risk assessments shall be the nodal point of the contractor's H&S Plan and shall include:
  - The analysis and evaluation of the risks and hazards identified;
  - A documented plan of safe work procedure to eliminate, mitigate, reduce or control of the risks and hazards that have been identified;
  - A monitoring plan;
  - A review plan.

- These risk assessments will identify the hazards, risks and mitigation measures to reduce the risks. The method statements will describe how these tasks will be performed to implement the necessary mitigation measures. The risk assessor has to identify the Hazards with risk to personal injury and/or property damage that must be the catalyst for providing controls and preventive measures. Once a Hazard has been identified, the person in charge of the risk assessment shall provide the measures to eliminate or mitigate the hazard. Hazards shall be eliminated when is possible and can be minimized through awareness training, engineering controls, use of personal protective equipment (PPE) and/or monitoring devices.
- On place, foreman must use the risk assessment record by comparing the hazards identified daily before the work on site begins and the mitigation plans developed to control these Hazards. Foreman shall monitor existing controls and preventive measures to insure accuracy and usage. Foreman shall continue to compare the actual work to the assessment allowing for changes in the assessment when change is occurred. Workers shall be familiar with the risk assessment, use the existing controls and preventive measures while performing the tasks, and provide input to their Foreman to ensure that risk assessment procedure reflects all Hazards identified and is reviewed when needed.
- Risk assessment must be reviewed formally whenever an HSE event happens. The document shall be submitted to Principia Energy,

for review and approval.

- To carry out the risk assessment Contractor shall take into consideration, including but not limiting the following conditions and risks:
  - existing Work Site Health and Safety rules (for Work Sites under Principia Energy or third-party control),
  - Work Site conditions (including environment aspects and impact on H&S),
  - Work Site boundaries conditions (including environment aspects and impact on H&S),
  - works activities normally performed by Contractor, including preparatory activities and commuting/travel,
  - cooperation with other contractors appointed by Principia Energy and possible impact/interference on its Contract performance,
  - works related hazards and risks (one or more) of each activity, including but not limited to:
    - falling from same level,
    - falling from heights,
    - electrical,
    - chemical and/or biological agents (including when contained as part of materials or equipment, e.g. equipment containing asbestos),
    - falling objects,
    - impact with objects,
    - noises and vibration exposure,
    - fire and explosion,
    - thermal contact,
    - traffic/travelling (i.e. travelling through rural and inaccessible areas, conditions of the path for reaching the Work Site..),
    - lack of lighting,
    - material projection,
    - entrapment,
    - ionizing and non-ionizing radiations,
    - confined spaces,
    - landslide and collapse,
    - barotrauma, decompression sickness, gas poisoning (underwater works),
    - cutting,
    - ergonomic conditions (clumsy movement, strains or overexertion),
    - animal aggressions,
    - exposure to extreme weather and effects of sunlight for outdoor workers
    - generic risk: during the execution of any activities, as well as in the preparatory and travelling phases, there are common hazards that could cause incident like impact with objects, cuts, falls, ergonomic (clumsy movement or strains) accidents, as well as animal aggressions, atmospheric (lightning, flooding event…) accidents, heat strokes or other similar incident.
    - interference risks as in work activities where different subjects work at the same Work Site,
  - night shift,
  - lone working
- H&S Plans shall also include prevention and protection measures for eliminate or, at least, reducing each or more risks, such as:
  - preventive and/or periodical health surveillance,
  - definition of works activities procedures and/or instruction and/or methods,
  - definition of protective measures, such as collective and personal protection equipment (like proper dress, shoes, aprons and gloves requirements accordingly to risks consequent the activity to execute, etc.).
  - ensure proper Personnel selection/training/qualification for the execution of work activities,
  - emergency plans, including first aid, fire prevention and emergency management,
  - properly manage interference risks,
  - manage and properly dispose of Hazardous Substances that represent a health and safety hazard,
  - strictly regulate the use of communication devices as mobile phones/smartphones/tablets; (e.g. during activities execution, while driving, going up or down stairs, crossing roads and in all the cases that it could create a distraction),
  - report proper signs for highlight eventual temporary risks (e.g. slippery floor),
  - physical delimitation of dangerous areas in order to allow the access only to authorized Personnel,
  - provide panels and signs for evidencing the type of activity carried out and all relevant information,
  - provide the appropriate handrails for stairs and walkways,
  - maintain tidy and clean all working areas,
  - design a correct viability in the Work Sites, avoiding interference between pedestrian and vehicles as well as positioning the needed traffic signs, speed bumps,
  - evaluate weather condition before and during activities execution,
  - protective measures, such as collective and personal protection equipment.
- In addition, H&S Plan, or its attached documentation, shall include, where appropriate, the designation of:
  - safety responsible,

- safety officers, cooperating with the safety responsible,
- authorized Personnel (access to site, delimited areas, etc..)
- qualified Personnel for specific works,
- scaffolding supervisors,
- operations coordinators for mechanical handling of loads,
- head of cargo handling operations,
- supervisors of life-lines,
- persons in charge of emergency, first aid and fire prevention;
- any other specific Health and Safety Personnel nominations required by Law or elsewhere in the Contract.

These above guidelines are also applicable to O&M activities.

5.5 INTERFERENCES MANAGEMENT

- The H&S Plan and the Emergency Plan must be updated with all relevant information coming from all the Contractors and it must include the management of interferences among activities/workers/Companies, and must provide to all initiatives to avoid or reduce any kind of risk related to interferences.
- At least weekly, Contractor's responsible have to hold a HSE meeting with Principia Energy representatives to manage the coming activities planned for following weekly plan. The report of these meetings must be shared between all participants and forwarded to Principia Energy and to the other Contractors responsible immediately. Principia Energy will attend the meeting to support the coordination between all Contractors.
- However, before starting daily activities, with interference between several Contractors or across teams of the same Contractor, has to be scheduled a pre-job check meeting involving the Safety Coordinator and all Foreman and Safety Officers of Contractors so that:
  - Identify correctly risks of interference by each safety officers;
  - Ensure the identification and application of the prevention, protection and coordination choosing the CPE and/or PPE equipment, device, in order to manage properly the interference risks;
  - Identify a single person of the team to manage human-machine interactions during activities.
- At the end of pre-job check meeting, Contractor representative has to report the meeting content through paper (minutes of meeting, MoM), and sharing it with Construction and HSE Team.
- Contractor's representatives on the Work Site shall call HSE meetings if needed: Contractor and Subcontractors must attend the meetings.

6 ENVIRONMENTAL MANAGEMENT PLAN

6.1 REQUIREMENTS

- The Contractor shall deliver to Principia Energy the Environmental Management Plan according to ETA (Environmental Terms Approval) relevant to the specific Work Site and activity prior to commencement of Work Sites activities and update or supplement it regularly, as circumstances or the Contract require, or as specifically requested by Principia Energy,during the performance of the Contract.
- The Environmental Management Plan shall be carried out in accordance with applicable Law and ETA, if any, and/or in accordance with the guidelines set out in Section 6.2, and/or according to ISO 14001 standard (or equivalent standard, in this case Principia Energy reserves the right to approve the method), in case of conflicting requirements, the one maximizing Environmental protection applies. In the event the Contractor is unable to follow the above mentioned requirements (e.g. because applicable Law requires a different standard), it must request a determination from Principia Energy, which will make a determination as to the standard to apply.
- In case of Contracts applicable to multiple Work Sites, particular focus of the environmental risk assessment shall be provided to the specific activity to be performed. In this case the Environmental Management Plan must be delivered to Principia Energy prior to commencing the performance of Work Site activities provided by the Contract and then the Contractor shall implement it for each Work Sites, updating it whenever a new environmental risk could occur. Principia Energy group Environmental Policies and Principia Energy's particular instructions for said Work Site (if any) should also be taken into account in case they require higher duty care than applicable Law.

6.2 GUIDELINES FOR ENVIRONMENTAL MANAGEMENT PLAN

- Contractor shall include and consider in the Environmental Plan the evaluation of the following aspects where applicable to the contractual activity:
  - identification of relevant environmental aspects/impacts, risks,
  - requirements established in the environmental permits and licenses approved by the authority
  - waste management including need of temporary storage,

- waste water management,
- fresh water/ sea water management,
- diffuse emissions mitigation plan,
- excavated soil and rocks plan, including hydrogeological rearrangement of areas affected by works,
- noise mitigation plan,
- detailed plan explaining how the Contractor and its subcontractors shall comply with all environmental requirements for all the environmental aspects (that will be at least: atmospheric emission, waste, soil management, noise, waste water, dust and particles emissions, biodiversity protection etc.) during all the works,
- environmental emergency management plan,
- description of the environmental monitoring operations/actions, including planning and frequency,
- description of reporting to be handed over to authorities,
- compliance with existing Work Site environmental rules, for Work Sites under Principia Energy or third-party control.
- compliance with environmental terms arriving from ETA

6.3 ENVIRONMENTAL RISK ASSESSMENT

- An environmental risk assessment is a document that outlines the health risks associated with exposure to environmental contaminants at a site and provides the justification for taking action to remediate or remove the contamination.
- Environmental Risk Assessment (ERA) is a process that evaluates the likelihood or probability that adverse effects may occur to environmental values, as a result of human activities (i.e., a formal procedure for identifying and estimating the risk of environmental damage).
- The risk assessment identifies all aspects of construction that could have an environmental impact and assesses the potential risk and impact of that activity on the environment. Management controls are then devised to eliminate and/or minimize those identified impacts. Risk evaluating is the frequencies and consequences of risk occurrences of activity or exposure and generation of risks that arises from dangers, considering the adequacy of any existing controls, impacts and deciding whether or not the risk is acceptable.
- Contractor performing any work shall, before starting and during any activity, perform environmental risk assessments which have to be performed by competent personnel (risk assessor) appointed in writing by Contractor. Environmental risk assessor and HS risk assessor might be the same person.
- Contractor is responsible for assessing the risks related to subcontractors' activities.

The risk assessments shall be the nodal point of the contractor's Environmental Plan and shall include:

- The analysis and evaluation of the risks and hazards identified;
- A documented monitoring and control plan for the identified risks.

- On place, foreman must use the risk assessment by comparing the hazards identified daily before the work on site begins and the mitigation plans developed to control these Hazards.
- All workers shall be familiar with the risk assessment, use the existing controls and preventive measures while performing the tasks, and provide input to their Foreman to ensure that environmental risk assessment reflects all Hazards identified and is reviewed when needed (i.e. Gantt/Design Project modification, change of work execution mode, etc).
- Environmental Risk assessment must be reviewed formally whenever an Environmental event happens. The document shall be submitted to Principia Energy, for review and approval.

7 HSE ORGANIZATION AND RESPONSIBILITY

7.1 For the Contract duration, each Contractor shall appoint:

- HSE coordinator - one (1) full-time present on site, responsible for the safety and environmental protection of the site. HSE Coordinator shall have the following education and professional background and shall be responsible for:
  - Engineering degree or equivalent diploma relevant to the activities to be executed (i.e. electrical engineer, civil engineer, mechanical engineer);
  - It is required at least 3 years of experience as HSE specialist or similar role in Engineering or Construction Companies.
  - Training Certification for First Aid and Fire fighting according to the local applicable Law
  - Experience in the construction of renewable power plant or conventional power plants or HV substations or HV T-lines.
  - Coordinate all HSE officers of subcontractors

- HSE Officers (1 per 50 employees per contractor as per local applicable laws). HSE Officer shall be full time present at the Work Site only dedicated to the control of all the HSE related aspects required by applicable Law and according to the HSE Plan. Additional duties of the HSE Officer are: prepare, update and monitor the required HSE documentation. HSE Officer shall have the following education and professional background:

- Engineering degree or equivalent diploma relevant to the activities to be executed (i.e. electrical engineer, civil engineer, mechanical engineer);
- It is required at least 1 year of experience as HSE specialist or similar role in Engineering or Construction Companies.
- Training Certification for First Aid and Fire fighting according to the local applicable Law

- Firefighter staff and First aid Staff trained personnel must be appointed, in relation to the number of workers present on Work Site, and as required by applicable Law

Otherwise, for construction sites with a reduced number of workers (less than 50 workers), the roles of HSE Coordinator, HSE Officer could be cumulated in one person (same person can be appointed to the relevant authorities for both roles).

7.2 Principia Energy may, motivated by HSE risk increase (e.g.: acceleration, night shifts), request the increase of Personnel to be allocated to HSE activities. Extra cost, if any, shall be agreed by the Parties.

7.3 Principia Energy reserves the right to verify the qualification, credentials and behaviour of Contractor's HSE Personnel and, in case are found to be inadequate, to communicate to the Contractor the refusal of a specific HSE person. Refusal shall be motivated by Principia Energy and preceded by discussion with Contractor. Contractor shall make available to Principia Energy documents proving experience and competences of HSE Personnel, reporting their professional expertise, academic background, credentials, always in accordance with personal data protection Laws.

8 PROVISIONS CONCERNING FIRST AID, FIRE PREVENTION AND EMERGENCY MANAGEMENT.

8.1 The Contractor must comply with provisions of Law and the Contract on the subject of first aid, fire prevention and emergency management.

8.2 The Contractor must make all arrangements necessary to ensure and warrant that each Work Site is supplied with:

- at least one first aid kit, pursuant to the provisions of applicable Law in force and based on Hazardous Substances used and undertaken works;
- trained Personnel able to respond and / or manage a foreseeable emergency scenario;
- a suitable means of communication to ensure a prompt response of first aid/emergency assistance;
- appropriate Equipment, suitable to the specific risks of the activities inherent to the subject matter of the Contract;
- firefighting and fire detection equipment, evaluated according fire risk assessment.
- when the public hospital is located more than 100 km away and over 60 minutes of road travel from the site a special provision should be made after an Agreement between the parties
- emergency trial must be performed before the start of the activity, including the path between the site and the closer hospital.
- the closest emergency services (hospital, fire brigade etc) must be informed, prior to start the works, of the presence of the construction or main activities.

8.3 Due to the size of the site, the number of workers expected on site (more than 100 workers) and the distance from the nearest first aid station/hospital (more than 60 minutes road travel) Principia Energy could require:

- Emergency/First aid room with paramedics always present on site from the start to the end of the activities (when activities are ongoing);
- At least a paramedic and a nurse 24/7 available on site (generally adopted when the worksite is in a remote area, with a camp for the workers);
- First aid personnel and first aid kits, at every work area for each Contractor and working area. This personnel shall be identified and communicated to the Emergency Response Plan;
- An automated external defibrillator (AED) present on site;
- Each Contractor's vehicle on the Work Site shall contain as a minimum a first aid kit;
- 4 x 4 emergency vehicle/ambulance with the proper equipment and medical tools to assist and stabilize any injured person on site, with radio communication system to guarantee the communication within the area among Foreman and HSE key people and the first aid personnel and the ambulance or emergency services.

8.4 All the actions pertaining to first aid and emergency management shall be carried out by the responsible appointed persons of the Principia Energy and the contractors involved in the emergency response plans.

8.5 For Work Sites under Principia Energy or third-party control, all Contractors' actions pertaining to first aid, fire prevention and emergency management must be carried out in coordination with the existing Work Site emergency plans.

9 HSE AWARENESS AND TRAINING

9.1 HSE KICK-OFF MEETING

- Before commencement of Contract activities Principia Energy and the Contractor will held a HSE kick off meeting for coordination of activities and a record of the meeting (minutes of meeting) shall be signed by representatives of both Parties.

9.2 INDUCTION TRAINING

- Contractor shall ensure that all Workers are aware of the risks and restrictions (e.g., concerning areas) existing or that could affect the Work Site, as well as possible emergency plans. Every Worker must attend an induction session (talk, presentation, video,etc..) on HSE, which shall be properly documented. The induction training shall be updated periodically or when new risks are identified.
- If required by Principia Energy, Contractor shall cause its Workers to attend a HSE induction training on specific risks, with Principia Energy and HSE key people.
- If required by Principia Energy, Contractor shall cause its Workers to attend a HSE induction training (through a webinar, talk or other means) during Stop Work Policy implementation.

9.3 TOOL BOX TALK

- Toolbox talks are informal group discussions that focus on safety issues. Toolbox talks are used daily to promote department safety culture and start health and safety discussions on job sites.

9.4 BASIC TRAINING

- Contractor shall ensure that all the workers are trained as required by the Law, regulations, according to the risk assessment and that they have valid competent certificate of training.
- As example, below are listed some of the competence developed with a basic training course:
  - HSE Risk Assessment Concept;
  - Stop Work;
  - Emergency Preparedness
  - Waste Management
  - Interference Management
  - Prevention and protection (PPE, CPE);
  - Safety and Environment Organization on Work Site;
  - Rights, obligations, Breaches and Disciplinary action;
  - Monitoring on Work Site by Law Inspector or Principia Energy.

9.5 OTHER TRAINING

- All workers shall be trained for the work assigned, skilled as required by Local Laws, Regulations and risk assessment. Depending on employee's exposure to certain Hazards other required trainings may include:
  - Work at Height;
  - Global Wind Organization (GWO) training;
  - Respiratory Protection;
  - Fall Protection;
  - Permit Required Confined Space Entry;
  - Excavation Safety;
  - Mechanical Lifting (including rigging, slings, etc.);
  - Manual Lifting;
  - Arc Flash / Electrical Safety;
  - Blasting Operations;
  - License in the operations of Cranes Forklifts, lifting platforms;
  - Environmental Training (regarding the Environmental management plan of site, included, but not limited to, waste and chemicals management system of site and Emergency environmental management);
  - First Aid;
  - Fire Fighting training
  - Operating of machineries

Contractor, in case Local Law do not require specific training for the risks defined in the risk assessment, shall in any case develop a system of

trainings, to be implemented also by the sub-contractors. Training will ensure the engagement on the project of skilled employees capable of performing all work in a manner to prevent incidents.

10 PROTECTION OF THE ENVIRONMENT

10.1 MATERIALS AND/OR EQUIPMENT.

- The Contractor undertakes to provide, wherever it is possible and under similar purchasing conditions, Equipment or materials with eco-label and those with greater energy efficiencies, with a longer service life involving lower costs and less likelihood of waste being generated due to shelf life expiry and lower final disposal costs. The equipment and materials provided by the Contractor shall protect the environmental quality.
- The Contractor shall ensure that the elements used in material and Equipment are not chemically unstable.
- The Contractor will comply with any provision regarding transportation, management and storage of products/materials, as well as management, recovery or disposal of waste according to applicable Law, providing under Principia Energy's request a copy of any documents and authorization.
- The Contractor undertakes to reuse materials and Equipment that are suitable to be used for the same purpose for which they were conceived, without any treatment. Where this is not possible, the Contractor undertakes to manage the recycle/recovery (first priority) or disposal of the resulting waste ensuring the compliance with Law and obtaining all the required authorizations. The Contractor shall also provide Principia Energy with copy of documentation required by Law and/or requested in the Contract.
- The Contractor undertakes to manage the supplied packaging and empty containers, in accordance with applicable Law. Also, the Contractor will be obligated to the withdrawal of the packaging used for transportation in the conditions and terms established in the Contract and Law, or, if these details are not indicated, the Contractor shall remove the packaging from previous deliveries when making subsequent ones and/or when Principia Energy so requests.
- The Contractor shall communicate, before the start of the activities, an estimation of the foreseen quantities of generated waste (waste management plan) , as well as the integral management of the same that will develop.
- In case of supply of EEE, batteries, packaging or other products subject to specific HSE regulations, Contractor shall give evidence of all fulfilments required by local law. In particular, in the event the Contract calls for the supply of "EEE" or batteries, the Supplier shall comply with local Law, also in relation to the end-of-life management, including (if applicable):
    - demonstrate to have adhered to an end-of-life recycling collective system recognized and valid for the Country where the EEE or batteries will be installed;
    - demonstrate to be registered to the National Register of EEE or batteries Producers of the Country where the equipment will be installed;
    - mark the EEE with appropriate symbol (in accordance with local standard).

10.2 WORKS AND/OR SERVICES.

- The Contractor must:
    - follow the Environmental Management Plan;
    - provide to Principia Energy the environmental performance data (e.g.: fuel consumption, waste), if required;
    - provide relevant information on the activities covered by the Contract, to contribute to Principia Energy's calculation of the carbon footprint, circular economy index or any other indexes related to the Environmental Management System, if required in consideration of the activities' relevance . Similarly, the information on the carbon footprint of activities could be assessed by the Subcontractor.
- The Contractor must inform Principia Energy within a maximum of 24 hours, about any changes, withdrawal or updates concerning authorizations and/or permits, providing a copy of the new documents issued by authorities.
- The Contractor undertakes to verify that their Personnel know, understand and execute all requirements and regulations relating to environmental protection, applicable to perform the Contract, as well as Principia Energy 's environmental policy and the applicable internal procedures (the list of applicable procedures will be included in the contractual documentation).
- The Contractor guarantees, providing evidence - if required, that the Personnel that will perform the Contract, has or receives

adequate theoretical and practical training, with reference to the Contract activities and Work Sites. Training will include the obligations arising from the Environmental Management System, where applicable.

- Unless otherwise provided in the Contract, the Contractor shall:
  - leave clean and free of debris the work area once completed the execution of the Contract, removing all debris, containers, packaging, garbage, junk, and all kinds of waste generated, there remain, being responsibility of the Contractor, the collection, transport and authorized management thereof;
  - take appropriate measures to preserve biodiversity on site and prohibit its employees from carrying out hunting and fishing activities in the Work Ste;
  - cut vegetation at the minimum possible and only when it is absolutely necessary; it is mandatory the Contractor has the corresponding permits (licenses) from the authorities and Principia Energy's authorization. The Contractor must present the information

    about cutting to Principia Energy prior to start said activity. Principia Energy shall agree with the Contractor the advance period for the delivery of this information;
  - store hazardous waste, providing to separate incompatible chemicals and avoiding the mixture between hazardous and not hazardous waste, in accordance to applicable regulation and Principia Energy's requirements;
  - dispose all wastes originating from Contractor work activities to authorized sites only, in compliance with the applicable regulations;
  - clear signalling areas and waste with significant environmental potential impact;
  - comply with specific Country's waste management requirements reported in ETA terms ;
  - prevent emissions of dust or other substances in the transport of materials and any other activity likely to generate dust or other substances;
  - prevent emission of noise and vibration during the execution of the works;
  - properly segregate each residue/waste separately, by placing, in the place of performance of the Contract, a sufficient number of containers, closed, marked and in good condition, in order to prevent uncontrolled spills, leakages or emissions that could impact the environment;
  - Manage soil and rocks from excavation in accordance to applicable regulation and Principia Energy's requirements;
  - Minimize water consumption;
  - Prevent events that may generate soil erosion.

- The Contractor shall be provided, when handling and storing oil-containing equipment, with proper containment/absorbent materials in order to immediately mitigate dangerous substances spills. In particular, in case of handling or works with generators, transformers, hydraulic drives system, the Contractor shall be provided with a proper emergency spill kit (absorbent material with total absorption capacity adequate for the oil-containing equipment, cylindrical barriers/sorbent socks enough to isolate the spill, disposal bags/bins, PPEs, …).

- Concerning greenhouse gases and ozone-depleting substances, all the relevant works at the Work Site (e.g. installation or maintenance of SF6 containing equipment, etc.) must be carried out by suitably trained Personnel and, in the Countries where is foreseen:
  - Workers shall be provided with the relevant certification.
  - The Contractor shall be certified and registered to the portal/database foreseen by local Law and register all requested data by local Law.

All practicable precautionary measures must be taken to avoid and minimize leaks and emissions into the atmosphere. Furthermore, any emissions into the atmosphere must be monitored and registered.

10.3 WASTE MANGEMENT

Contractor shall set a waste management plan and deliver it before commencemnet of activities, that has to be followed during classification, handling, storage, transportation and disposal of waste generated as a result of typical construction/decommission/maintenance activities, in accordance to the applicable Law, ETA terms and to the requirements below:

- The first objective of the plan shall be to minimize the negative effects of the generation and management of waste on human health and the environment, so shall aim at reducing the use of resources and favor the practical application of the waste hierarchy :prevention, preparing for re-use, recycling, other recovery (e.g. energy recovery, recyclable materials in catering services, etc.) and disposal

- Contractor shall prefer bio-based content materials, recyclable or reusable components and recycled-content materials and in general use resources at their highest potential throughout the lifecycle to improve efficiency (in product manufacture, design, construction, operation, refurbishment, and at end of life).

- Identification of designated place(s) to store different types of waste such as not recycled and Hazardous waste materials. For hazardous waste material, the area must be fenced and with restricted access, sheltered and equipped with spill kits, oil basins (for liquid waste), fire

extinguishers and appropriate signalization. Before placing an order or a contract with a waste carrier, the carrier shall be asked to provide a copy of his Waste Carrier License or proof of registration as a Waste Carrier by the local authority. A copy of this approval must be kept on site in the environmental file.

- The waste management plan has to include also a specific chapter dedicated to demolition waste and to excavated material, if any.
- Waste shall be segregated at source and removed by a licensed Waste Removal Contractor.
- Waste shall be removed on a regular basis in order to respect waste storage limits in compliance with applicable Law. If there is no specific requirement by Law, Contractor must guarantee and respect the following limits: no more than 100 m3 of not hazardous waste and no more than 20 m3 of hazardous waste and if not exceeding this quantity no more than 3 months for hazardous and 6 months for not hazardous.
- Waste storage on site out of the designated areas is absolutely prohibited and must be considered a severe noncompliance with HSE Requirements. The temporary storage on the work sites areas must be done in the proper containers and shall be limited to the time of activities execution.
- Broken PV panels must be segregated and collected as Waste of electric and electronic equipment(WEEE) paying particular attention to avoid dispersion in the environment of any fragments;
- Needed interventions to delimitate eventual polluted area ensuring environmental protection and Safety condition
- Chemical analysis of polluted soil and water.
- Contractor shall inform Principia Energy in monthly basis for total amount of waste produced (hazardous and non hazardous) and amount sent for further treatment. Contractor shall also provide relevant documentation regarding abovementioned waste.

10.4 HAZARDOUS SUBSTANCES

- The Contractor shall supply and use (if provided in the Contract) Hazardous Substances properly packaged and labelled so that the product contained and the risks for the Personnel and the environment are clearly identified.
- Packaging and labelling shall provide information for safe unloading, storage and handling. Corresponding Material Safety Data Sheets (MSDS) shall accompany Principia Energy all Hazardous Substances. MSDS, provided in local language, shall include the expected uses, limitation or prescription related to their storage (if any), measures for risk mitigation and disposal instruction, in accordance with Law.
- Contractor shall maintain an updated inventory of all material safety data sheets for Hazardous Substances (including a file of the MSDS) used in connection with performance of the Work or at or near the Work Site or at any construction area related to the Work and shall update such file, at least monthly (with the exception of temporary and mobile Work Site, for which the update is requested only whenever a new Hazardous Substance is introduced into the Work Site), and make it available on Work Site in accordance with applicable Laws. The MSDS shall be easily accessible by the Workers. Contractor shall record in the inventory quantities, location of storage, use and final disposal of such Hazardous Substance.
- Contractor shall minimize the use of Hazardous Substances and shall conduct its activities and causes its Subcontractors to conduct their activities in a manner designated to prevent pollution of the environment or any other release of any Hazardous Substance. The Contractor shall provide evidence of the absence of oils containing PCBs and the absence of CFCs, HCFCs, halons, substances with trade restrictions, in the supplied equipment. Moreover the Contractor must avoid the use of asbestos in the supplied materials/equipment and in any used PPE and tool.
- Unless otherwise provided in the Contract, Contractor shall be responsible for the management of and proper disposal (within the timeframe set forth in the Contract) of all Hazardous Substances brought onto or generated at the Work Site by it or its Subcontractors, if any. The Contractor shall cause all such Hazardous Substances brought onto or generated at the Work Site by it or its Subcontractors, if any, (A) to be transported only by carriers maintaining valid permits and operating in compliance with such permits and Laws regarding Hazardous Substances (i.e. European Agreement Concerning the International Carriage of Dangerous Goods by Road -. ADR regulations, if applicable) pursuant to the manifest and shipping documents identifying, to the extent allowed by applicable Law, only the Contractor as the producer of waste or person who arranged for waste disposal, and (B) to be treated and disposed of only at treatment, storage and disposal facilities maintaining valid permits operating in compliance with such permits and laws regarding Hazardous Substances, from which, to the best of the Contractor's knowledge, there has been and will be no release of Hazardous Substances.
- Contractor shall submit in advance to Principia Energy a list of all Hazardous Substances to be brought onto or generated at the Work Site. Principia Energy reserves the right to approve or decline such Hazardous Substances. In case of decline, the Contractor and Subcontractors are forbidden to use such Hazardous Substances. The Contractor shall keep Principia Energy informed as to the status of all Hazardous Materials on the Work Site and their disposal from the Work Site.
- If the Contractor or any of its Subcontractors releases any Hazardous Substances on, at, or from the Work Site, or becomes aware of any

storage, release or disposal of Hazardous Substances on, at, or from the Work Site the Contractor shall immediately notify Principia Energy in writing. If the Contractor's work involved the area where such release occurred, the Contractor shall immediately stop any Work affecting the area. The Contractor shall, at its sole cost and expense, diligently proceed to take all necessary or desirable remedial action to clean up fully the contamination caused by (A) any negligent release by the Contractor or any of its Subcontractors of Hazardous Substances, and (B) any Hazardous Substance that was brought onto or generated at the Work Site by the Contractor or any of its Subcontractors or suppliers, whether on or off the Work Site.

- If Contractor discovers any Pre-Existing Hazardous Material that has been stored, released or disposed of at the Project Work Site, Contractor shall immediately notify Principia Energy in writing. If Contractor's Work involves the area where such a discovery was made, Contractor shall immediately stop any Work affecting the area and adopt the measures in order to ensure a safe Work Site. Contractor will not thereafter resume performance of the Work in the affected area except with the prior written permission of Principia Energy.

11 REPORTING

11.1 SAFETY ACCIDENT/INCIDENT REPORTING AND MANAGEMENT

- Contractor shall notify Incidents and Safety Observations related to the performance of the Contract, regardless of the person affected (whether Personnel of the Contractor, Principia Energy or third-parties), as follows:
  a) report on health and safety matters occurring during the performance of the Contract to Government Authorities in accordance with the applicable Law, such communication (for coordination and mitigation purposes) should be, if at all possible, after communication to Principia Energy,
  b) immediately communicate to Principia Energy any Accident or Stop Work (at least by phone),
  c) within 6 hours of occurrence, unless otherwise provided in the Contract (24 hours in case of Minor Accidents): notify Principia Energy of any Accidents or High Potential Incidents that occurred during the performance of the Contract, by written notice, including a detailed description of the event, all the available preliminary information, available medical prognoses, copies of any report filed with Governmental Authorities,
  d) within 3 calendar days from the occurrence, notify Principia Energy of any Safety Near Miss, Safety Observation or Stop Work that occurred during the course of performance of the scope of Contract, by written notice reporting corrective/preventive measures adopted.
- Contractor must keep record of events and statistics about Safety, related to the performance of the Contract.
- In case of Accidents meaning Fatal Accidents, Severe Accidents and Minor Accidents occurred during the performance of the Contract, Contractor shall deeply analyse the event and:
  a) within 3 calendar days from the occurrence, transmit to Principia Energy, a preliminary report of the analysis,
  b) within 7 calendar days from the occurrence, transmit to Principia Energy the relevant report recording the detailed causes of the Accident and the corrective/preventive measures adopted.
- In case of High Potential Incident occurred during the performance of the Contract, Contractor shall deeply analyse the event and:
  a) within 3 calendar days from Principia Energy's notice to the Contractor that an Incident was classified as a High Potential, transmit to Principia Energy, apreliminary report of the analysis,
  b) within 7 calendar days from the occurrence, transmit to Principia Energy the relevant report recording the detailed causes of the Incident and the corrective/preventive measures adopted.
- In the instance Principia Energy directs its own investigation into an Accident, by means a dedicated group of analysis, the Contractor must provide maximum cooperation, providing quick and diligent efforts of any information that may be requested.

11.2 ENVIRONMENTAL EVENTS REPORTING AND MANAGEMENT

- The Contractor must immediately, as soon as detected, inform by phone call Principia Energy 's representative on any Environmental Event that occurs during the execution of the Contract. In case of event/material damages that implies the obligation of reporting to the authorities, Principia Energy shall be informed at the same time as (not later) the communication to the authorities.
- Moreover the Contractor is obliged to submit a written report of the event including its causes and the measures taken for the management and resolution of the event, within 24 hours.
- In case of an Environmental Near Miss, the Contractor shall notify Principia Energy by written notice within 3 days. Should an Environmental Event occur, whatever it may be, the Contractor must immediately intervene to apply all possible techniques to mitigate the damages. If Principia Energy requests the Contractor to follow specific instructions in order to manage the environmental event, the Contractor

shall comply with the received instruction.

- The Contractor must immediately (no later than 48 hours) inform Principia Energy, about any evidence related to access, checks and inspections carried out by any Government Authority in the Work Site and the actions carried out or planned in agreement with the authorities aimed at restoring legal compliance.

11.3 HSE NON-CONFORMITY REPORT

- Contractor shall track in an "**HSE Non Conformity Report**" all Non Conformities detected during inspections (by HSE Contractor's Personnel or by Principia Energy Personnel) and the corrective action taken.

12 SUBCONTRACTORS

12.1 GENERAL HSE OBLIGATIONS FOR SUBCONTRACTING

- The Contractor shall cause its Subcontractors to perform the activities in accordance with the Contract, the applicable H&S Plan and Environmental Plan.
- The Contractor shall pay the safety costs related to the subcontracted activities to the Subcontractor without any reduction. These costs include cost for the measures adopted to eliminate, or if not possible, to reduce health, safety and environment risks caused by several works activities which interfere with each other.

- Respecting the principle that all activities defined in the Contract must be performed by the Contractor or his subcontractors, the Contractor is obliged to notify and coordinate with Principia Energy of any cases of ancillary activities to be performed by third parties other than his subcontractors.

12.2 SUBCONTRACTOR SELECTION

- Contractor shall guarantee a proper Subcontractor selection checking that Subcontractor meets applicable Law
- Contractor shall verify that Subcontractors HSE performance is similar to the one declared by Contractor to Principia Energy during the relevant Supplier Qualification Process.

- In the event that the HSE performance of the selected Subcontractors is lower than the ones declared by Contractor, Contractor shall provide to Principia Energy a detailed improvement plan, agreed and signed by Contractor and Subcontractor, where are addressed the various actions that will be adopted during the works execution in order to ensure a proper HSE performance.
- The selection of a Subcontractor already qualified by Principia Energy should be a preferred option.
- Contractor shall submit to Principia Energy, for the necessary checks finalized to subcontracting authorization, relevant selection documentation. In particular the Contractor shall provide to Principia Energy, under his own responsibility, a selection report including both the qualification criteria as well as relevant evidences proving that the Subcontractor meets HSE selection requirements.
- Contractor shall provide to Principia Energy all the documentation relevant to the Subcontractor selection at least 30 calendar days before theexecution of the contractual agreement between the Contractor and its Subcontractor. Once received the subcontracting documentation, Principia Energy reserves 30 calendars days for necessary verifications and Subcontractor authorization; in this period the Subcontractor shall not enter Work Sites or perform contractual activities.
- As an example, the following documents shall be provided:
  - H&S and Environmental Policy (if available);
  - HSE plan (if required)
  - typical HSE risks assessment;
  - HSE Officer declaration according to Greek legislation;
  - safety procedures/work method statement that clearly regulate the activities execution;
  - internal HSE organization with HSE representatives appointed with clear roles and responsibilities;
  - HSE procedures referring to:
    - HSE training for all personnel;
    - personal protective equipment (PPE);
    - safety inspections execution;
    - accident analysis and implementation of corrective action plans;
  - copy of the accidents record (or similar document certified by the national institute for work accidents, if any);
  - figures relevant to work accidents occurred in the last 3 years and for every year (i.e. frequency rate, etc.);
  - any certification according to the standard ISO 45001 (or equivalent) and ISO 14001 (or equivalent) (if available)

- Before granting authorization to subcontract, Principia Energy will have the right to carry out further checks on the Subcontractor requirements compliance, unless explicitly in conflict with Law.
- The Contractor shall apply the same selection process in the event that further subcontracting is agreed within the scope of the same contract.
- The Contractor shall also keep the relative Subcontractor documentation for at least 6 months after the Contract expiration, in order to permit Principia Energy to carry out checks or send such documentation to Principia Energy, where required by Principia Energy or by Law.

12.3 SUBCONTRACTOR MANAGEMENT

- For the entire Contract duration, the Contractor must provide to Principia Energy documentation relevant to the activities performed by its Subcontractor and its compliance with the applicable HSE Law, these HSE Terms and Requirements and the Contract.
- Subcontractors HSE documents must be kept where the activities of the Contract are performed, or for the purposes of their application, or to be produced on request.
- The HSE clauses of the Subcontractor's Contract shall be available to Principia Energy's Unit in charge of manage the Contract in case Principia Energy requires it in a complete and signed copy.

13 SPECIAL REQUIREMENTS FOR COMPLEX WORKS

13.1 In case of Complex Works, the Contractor shall keep under control all risks coming from the interferences among the activities carried out at a same Work Site by the Contractor itself and/or its Subcontractors and cooperate and coordinate with other contractors to minimize the interference risks.

13.2 During a Complex Work activity, Contractor shall consider the risks associated with the performance of the Contract and the work planning, organization and coordination and the prevention and protection measures to be established so that the interference risks do not affect other activities which are characterized by their own specific risks and carried out at the same Work Site.

13.3 Contractor must take part in the coordination (or at least cooperation, depending on the Contract provisions), also considering the requirements of applicable Law.

13.4 APPENDIX 1 Focus on Complex Works activities reports requirements and indications about the specific issue.

14 DOCUMENTATION AND INFORMATION TO BE PROVIDED BY THE CONTRACTOR

14.1 LEGAL EMPLOYMENT AND HSE DOCUMENTATION

- Contractor shall provide the information and documentation, required by Principia Energy, necessary to verify the correct fulfilment by the Contractor of those legal obligations from which any liability could arise towards Principia Energy. The list of document requested by Principia Energy is summarized below (paragraph 14.2, 14.3) and is not exhaustive.
- Parties agree to modify, during the performance of the Contract, the list of documents in the event of change in Law or change of Principia Energy HSE policies (extra cost, if any, shall be motivated by Contractor and agreed by the Parties). In such case, Contractor shall forward to Principia Energy the new list within the agreed deadline.

14.2 DOCUMENTATION TO BE PROVIDED OR MADE AVAILABLE BY THE CONTRACTOR BEFORE THE START OF CONTRACT ACTIVITIES

- At least three weeks before the start of each activity and considering all Personnel (Contractor, Subcontractors or self-employed), the Contractor shall, for that specific activity:
  a) provide the list of Personnel that will participate in the execution of contractual activities, indicating for each of them: Name and surname; No. affiliation to Social Security or equivalent (if the communication of this data is compliant with applicable Law); Work Site where they will serve; occupational category or job position; where appropriate, whether the worker is subject to particularly dangerous risks.
  b) This list of Personnel will be updated and provided to the Principia Energy whenever an incorporation or dismissal assigned to the implementation of the contract works occurs as well as in case of additions of new Personnel (whether or not newly recruited) occur,
  c) inform of all Personnel that will be in the worksite for any reasons not strictly related to contractual activities, ensuring that such personnel shall observe safety standards of the worksite and limits for restricted areas;
  d) make available the H&S Plan,

e) provide the Environmental Plan,

f) provide the documentation related to Complex Works,

g) make available (or provide a soft copy if required) an HSE file, containing at least:

- Evidence of specific theoretical and practical training (individual certifications) according to the activities assigned to the Personnel,
- Medical fit for duty certificate (unless differently provided by applicable data protection law),
- evidence of delivery and reception that Workers have received personal protective equipment (PPE), corresponding as provided in the H&S Plan. Document has to include list of PPE delivered to the worker,
- Contractor statement assuring that all equipment, tools and personal or collective equipment that will be used in performance of the Contract comply with the H&S Plan and Environmental Plan and that they have the corresponding CE declaration of conformity or equivalent required by applicable Law

h) provide the list of authorized vehicles and machinery that Contractor will use in the performance of the Contract. Whenever Contractor intends to use a vehicle or machinery not included in the list, Contractor shall update and provide to Principia Energy the document in advance,

i) provide, on request, all documentation showing the compliance with:

- applicable HSE Law on, including – but not limited to – obtaining permits and respect of the limits therein described, if any,
- H&S Plan and Environmental Plan.

- The Contractor is obliged to have archived a file containing all this information stated in 14.2, in case of worker documentation a file for each of their Personnel. The mentioned documentation is subject to review and verification by Principia Energy before the beginning of the activities and at any time. Also, if required to do so, the Contractor has to put this documentation available to Principia Energy no later than forty-eight (48) hours.
- Contractor must keep updated the mentioned documentation during the performance of the Contract and provide Principia Energy with any updates.

14.3 DOCUMENTATION TO BE PROVIDED BY THE CONTRACTOR DURING THE PERFORMANCE OF THE CONTRACT

- The Contractor shall keep an updated daily Personnel list of the entire staff employed by the Contractor or its subcontractors at the Work Site and of the vehicles that enter in the Work Site (Personnel log/Vehicles log). Contractor shall submit these logs to Principia Energy on a monthly basis, or earlier in case a change of the Personnel involved in the contractual activities occurs.
- The Contractor shall provide, on request, all documentation showing the compliance with applicable HSE Law, including – but not limited to – obtaining permits and respect of the limits therein described, if any.
- The Contractor shall prove to have procedures that allows the fulfilment of the requested requirements and the continuous compliance with the applicable Law.

14.4 INFORMATION ON SAFETY

- The Contractor shall provide:

a) within the first 5 days of each month the number of hours worked by the Contractor and its Subcontractors Personnel in the Contracts (total, by Contract, by Work Site and employee) in the previous month,

b) number of employees of the Contractor and its subcontractors classified by gender (male/female) to the extent this information is relevant for logistic purposes (e.g.: as installation of certain numbers of toilets and showers, if any), who perform their activity in Contracts,

c) days worked by the staff of the Contractor and its Subcontractors (estimated equivalent to full-time working days -FTE-) involved in Contracts to include in its order: 1) construction activities; 2) exploitation; and 3) maintenance; 4) other.

15 HSE REQUIREMENTS FOR ACTIVITIES

15.1 VEHICLES, MACHINERY, EQUIPMENT, TOOLS AND MATERIALS

- Contractor shall supply and use all vehicles, machinery, equipment, tools and materials compliant with applicable Laws, require for the appropriate safe and high quality execution of scope of Contract.
- In areas where rollover risk has been highlighted all vehicles and machinery must be equipped with roll-cage.
- Use vehicles, machineries, equipment, tools and materials and best practice standards set forth in applicable regulations, shall make available (and forward, if required) to Principia Energy, before the commencement of each activity at the Work Site, all information related to the vehicles, machinery, Equipment and materials it is going to use in the performance of the specific activity. Principia Energy

reserves the right to validate this information before authorize the activity execution. Additionally Principia Energy may require a relevant declaration signed by the Contractor, abstain from using vehicles, machinery, Equipment, tools and materials owned by Principia Energy without prior written authorization.

- Contractor shall ensure that all vehicles, machinery, Equipment and tools shall be regularly maintained in order to withstand deterioration (including protective material covers, insulation, and others). In addition, they must be equipped with all the elements that ensure their safe use (lights, alarms, rear- view mirrors, protective guards, etc.). The use of vehicles, machinery, Equipment and tools without the protective devices is prohibited.
- Contractor's vehicles, machineries, equipment and tools shall only be used by authorized Personnel. When required by the Contract or applicable Law, Contractor shall authorize only trained and/or qualified personnel, which shall own certification for the use or driving license/permission.
- Principia Energy shall preventively authorize Contractor and Subcontractor vehicles and machinery entering Work Site for the execution of Contract activities. All vehicles and machinery used in the Work Site shall have inside an identification number and the Contractor or Subcontractor Principia Energy Logo.
- Principia Energy reserves the right to inspect all the elements and relevant documentation described in this subsection, before and during the use of machinery, vehicles, equipment and tools in order to verify their compliance with the applicable Law, standards, and HSE Terms and Requirements, as well as the Contract provisions. In the case that during the inspection Principia Energy verifies they are not compliant, the Contractor shall immediately stop and/or remove them from the Work Site.
- If electrical vehicles will be used on site, Contractor must prepare a dedicated area inside the site camp equipped with devices for charging the batteries.
- The required documentation for each vehicle and machinery type are shown to the following table according to the vehicle/machinery:

Vehicle/Machinery	License	Insurance	KTEO (Technical check)	Emissions card	Lifting certificate	Calibration of Anemometer certificate
Vehicle	x	x	x	x	-	-
Trucks	x	x	x	x	-	-
Machinery	x	x	-	-	-	-
Crane truck	x	x	x	x	x	x
Crane	x	x	-	-	x	x
Forklift	x	x	-	-	x	-
Concrete pump truck	x	x	x	x	x	-

a) **Cranes**

- Any Contractor or Subcontractor operating, a crane or rigging on site shall have a program to address the Hazards that includes the items below:
- Only trained, qualified and certified personnel shall operate cranes and other truck equipped with such lifting equipment.
- Only approved and certified personnel shall be allowed to operate cranes. Contractor shall provide to Principia Energy written certification for each employee who might operate a crane.
- All cranes shall be strictly maintained in accordance with the manufacturer's recommendations.
- Maintenance log has to be available for Principia Energy.
- The following are requirements to minimize the possibility of an incident during crane and rigging operations:
    - Define the crane access on worksite and locate its placement. It must also be defined range of moving and lifting of loads and their storage.
    - A lift plan is required for all heavy lifts, a heavy lift is at 75% of the cranes capacity. All heavy lifts should be identified prior to construction and be included in Contractors' method statements.
    - All personnel shall be clear of a load before it is picked up and shall remain clear at all times. Personnel should face the crane in full view of the crane operator and/or signalman. Personnel, including those holding tag line(s), shall never be under suspended loads or go between the load and other objects where they may be trapped or crushed.

- The crane operator shall never leave the control while a load is suspended. Cranes shall not be left connected to towers sections, whether erected or not, without an operator at the crane controls.
- Non-conducting tag lines shall be used to control all suspended loads. Chains or steel cables are not acceptable. Tag lines shall be attached before a load is lifted.
- A single designated signalman shall be used if the crane operator does not have full view of operations, especially when moving in restricted area with the presence of other workers. Where practical, the use of radios or other communication equipment is also recommended. The crane operator shall respond only to signals from the signalman, but shall obey a stop signal from anyone at any time.
- Any vehicle shall have warning lights, appropriate lights if used at night, an alarm signaling when the vehicle is backing up and for heavy vehicles a safety active device to avoid interference man-machine
- The crane operator shall inspect lift lines, rigging, slings and crane fittings/fasteners daily when in use or prior to each lift and replace if necessary. This equipment shall be properly rated for the intended load and certification tags attached to all slings.
- A crane shall not be used to pull a load sideways.
- A crane boom shall not be used as a ladder for walking, except for necessary maintenance of the boom and its components.
- When not in use, the crane boom shall be kept in the cradle.
- For rigging, never use a chain when it is possible to use a wire rope.
- Determine the load weight before rigging it and do not exceed the safe working load of any equipment.
- Before being unhooked, all loads shall be safely landed and properly blocked.
- A wind forces assessment should be conducted prior to starting with the task.

b) **Forklift**

- Only trained and qualified personnel shall operate forklifts.
- Training shall be conducted for the operator
- Contractor shall provide written certification to Principia Energy for each employee who might operate a forklift.
- All forklifts shall be strictly maintained in accordance with the manufacturer's recommendations.
- Maintenance log has to be available for Principia Energy.
- Personnel shall not ride on forklifts.
- The forklift shall have warning lights, appropriate lights if used at night, and an alarm signaling when the vehicle is backing up.
- When a forklift is left unattended, the forks shall be fully lowered, controls put in "off" or "neutral" position, the power shut-off, and the brakes set. Wheels shall be locked if the forklift is parked on an incline. Ignition keys shall be removed and stored in a secure place.
- The forklift operator shall ensure that the forklift's wheels are properly locked before unloading.
- Seat belts shall be worn when operating any equipment.
- All the movements must be carried out with the fork in low position.
- In case of slopes and irregular ground the operator must be instructed to avoid the overturning of the forklift. All equipment must have a rollover protection system.

c) **Ramming Machine**

- For the piling work, the contractor must choice the Ramming machines that have state-of-the-art safety systems in order to safeguard the safety and health of the workers. From the construction point of view, the machines must comply with the safety requirements for the risks pertaining to the type of use envisaged on site. Machines on site shall mandatorily respect these requirements:
  - Physical protection (shell or grid) of all movement parts in order to avoid entrapment or splinters ejection
  - Guard of track in order to avoid feet crushing or entrapment
  - Safety physical block of all movements part during maintenance operation
  - Use of chains or steel wire ropes certified, foreseen on machine manual and properly dimensioned for the weight lifted
- In general, it is possible to use the ramming machine to bend or to extract piles only if this operation is foreseen on the machine manual and with specific tools.
- The preferential choice of the machines by the contractor must fall on those that comply with the following safety criteria:
  - Machines equipped with redundant safety devices that prevent the accidental fall of the hammer;
  - Machines equipped with sensors for human-machine interference management;

- Machines with periodic preventive maintenance plan provided by the manufacturer;
- Machines equipped with an ergonomic and user-friendly control console, (Alternatively a radio- controlled console is preferred);
- Machines equipped with protection systems in case of accidental breakage of hydraulic hoses;

- In addition to the previous requirements, machines that are equipped with the following operating instructions are to be preferred:
  - Risk assessment and vertical pole positioning procedure by a second operator
  - Emergency procedures to be followed scrupulously by the operators in the event of: Hammer jammed/stalled;
  - Breakage or loosening of hammer lifting systems (hydraulic piston, chain, ring nut, or other system supplied);
  - Sudden ground sinking below the machine.

15.2 PERSONAL PROTECTIVE EQUIPMENT

- In the hierarchy of initiatives to be put in place to reduce and eliminate risks, the use of personal protective equipment is the last line of protection. This protection is used when the risk cannot be reduced enough to provide a safe working environment for the worker. Contractors must use the full range of PPE offered as fall protection devices, overalls in hazardous materials and complete respiratory protection for tools in confined spaces. In addition to PPE, it is also necessary to provide comprehensive training to ensure that workers are safe in all conditions and in the event of failure of the controls put in place. PPE may be labeled as the last line of defense, but it is just as important if not more important than the other lines of defense in the hierarchy.
- Contractor and Contractors shall ensure that their employees wear PPE as required by the specific task being performed, the potential Hazards that person will be exposed to and the specifics of the job.
- The Contractor must ensure prohibition of the use of ornaments and other metal accessories (rings, chains, straps with metal plates) by its technicians, in energized areas such as substations, conversion units or others.
- The Contractor has the obligation to provide its staff with the appropriate means to be able to carry out the work safely. Therefore, it has the obligation in certain works to provide suitable work clothes considered PPE to protect the employees at work while executing such activities. This also includes the proper training of staff regarding the correct usage and storage of this specific PPE ensuring that employees are made aware of all the requirements while using the specific PPE.
- All employees (included supervisors) shall wear a shirt with long sleeves and long pants at all times. Tank tops, sleeveless shirts, and short pants or cutoffs are not permitted.
- This condition shall be respected also in summer season and as UV protection measure in order to reduce skin exposition, heat absorption and, in general, heat shock risk. Exceptions can be accepted by Principia Energy only for the long sleeves and only for workers not exposed to direct solar rays and after a specific risk evaluation for these roles carried out by the Contractor.
- Loose or floppy clothing is prohibited around rotating or moving equipment. Rings, neck chains or loose jewelry shall be removed.
- Contractor must ensure that all the visitors and employees wear the minimal and proper PPE in all the different areas of the site. Work sites, roads, office area, etc.
- Provision of PPEs for visitors must be kept on site (minimum 5 pieces per each PPE). PPEs must be in good condition. Minimunm PPE for visitors are safety helmet, high visibility vest, safety glasses and safety shoes
- Workers, employees and visitors on site shall wear high visibility clothes and appropriate personal protective equipment (PPE).

Below a list of minimum PPE required by, to be adjusted in compliance with the risk assessment.

a) **Head Protection:** An approved hard hat shall be worn by all visitors and employees working at the site at all times except while in vehicles, living quarters, offices, and control rooms (after construction in control room is complete). Where high wind conditions are present, non-strangling chinstraps shall be worn.

b) **Eye Protection:** Safety glasses with side shields shall be worn by all visitors and employees always working at the site except while in vehicles, living quarters, offices, and control rooms (after construction in control room is complete). During night operations, only clear or amber colored glasses shall be worn. When safety glasses do not provide adequate protection, safety goggles or face shields shall be the means of protection (i.e.: splash Hazards when working with chemicals, high-pressure washers, chipping, buffing or grinding operations). Welding hoods shall be used during all arc-welding operations. Goggles or other suitable eye protection with appropriate filter lenses shall be used during all gas welding, gas cutting or brazing operations.

c) **Foot Protection:** Safety shoes must protect worker's feet from various risks: e.g., mechanical (slipping, impact, compression, puncture, cutting etc.), physical (water, heat, cold etc.) and electrical (antistatic properties, conductive properties, etc.). Work shoes must primarily be safe and therefore comply with the main requirements in terms of ergonomics, comfort, effectiveness and safety.

In case of evaluation demonstrates a specific risk on site, e.g. slip hazard, appropriate slip-resistant safety shoes shall be worn by all workers.

In particular in the case of working areas with tripping and slipping risk, for example due to mud, obstacles, excavated soils, workers shall wear high shoes to protect the ankles and proper grip to reduce the fall probability and related damages.

Safety shoes or a non-conductive (electrician's) safety boot shall be worn by all visitors and employees working at the site at all times

d) **Hand Protection:** Appropriate gloves shall be worn when the hands are exposed to Hazards such as cuts, punctures or abrasions (cloth, leather, leather palmed); when handling chemicals or Hazardous Materials where absorption is a concern (rubber gloves); and when performing electrical work. Flameproof gauntlet gloves shall be used during all arc welding, gas welding or gas cutting operations except when engaged in light work such as test fitting pieces. In particular, in order to individuate the correct gloves model related to the specific activities, it's required to respect dedicated codes indications as for example ISO 21420:2020.

e) **Hearing Protection:** Hearing protection shall be worn in all high noise areas or wherever a high-noise warning sign is posted. Hearing protection like disposable caps or earplugs must be present and available in a box on site.

f) **Leg Protection:** In case of risk of snakes' bites, protection of leg (Snake Gaiters) shall be worn by visitors and employees from the beginning of any pre activity or activity on site.

The contract, through appropriate signs, must demarcate in each area the PPE needed and all free PPEs areas on site. Contractor must also prepare and provide a map with the identification of the free PPEs areas.

15.3 TOOLS AND EQUIPMENT

- All, tools and equipment shall be regularly inspected by Contractor at least monthly or as required by applicable Law and risk assessments.
- All Contractor personnel shall be competent when operating or using tools and equipment. This shall include:
    - Appropriate certificate of professional competence;
    - precision measuring instruments with calibration certified by an external body;
    - Certificate of task training, where required;
    - Tools with sharp points or edges in toolboxes must be protected with a cover;
    - No make-shift (homemade) tools will be allowed on site;
    - All chisels used on site shall be fitted with a hand guard to prevent hand injuries in case of a miss with the hammer;
    - When using interlocking type of connection of an airline, whip lash arrestors shall be in place to prevent accidental disconnection;
    - Compressed air shall never be used for any purpose other than that for which it is provided;
    - In order to prevent injury to personnel and material loss, an emergency stop device that allow workers to stop the machine during an emergency by pushing a button or pulling a rope (where needed).
- In case of use of handtools, stand in the correct position and make sure there are no obstacles in your way when you are using it and do not remove protection. When possible, use modern type equipped with the dead man button.

15.4 HAZARDOUS SUBSTANCES

- Packaging and labelling of Hazardous Substances shall provide information for safe unloading, storage and handling.
- Handling, transportation and storage of Hazardous Material shall comply with applicable Law and with specific site operating instructions.
- Contractors shall ensure that storage facility for any Hazardous Material on-site:
    - Shall be sheltered and, in case of cylinder they shall be secured in an upright position;
    - Has a containment, a basin that contains possible spillage volume (volume in compliance with applicable Law)
    - Anti-leakages kit shall be available where there is the risks of liquid spill out.
    - An emergency instructions sheet must be always available on site with instructions and all data sheets
- All the Safety Data Sheets must be available in the storage and accessible in the working area. The dedicated area shall be equipped with an eye wash station and an emergency shower.

a) **Explosive**

- In case of activity to be performed with the use of explosive the risk must be evaluated and Contractor shall appoint a dedicated expert person trained to manage and prepare explosives and shall undertake all the safety and environmental preventive measures.
    - License for transportation and storage of explosive materials must be obtained, as required by applicable Law
    - Area of storage must be segregated, located far from any heavily vegetated areas, combustibles (stored oil, diesel, etc.), and on a non-combustible surface
    - Remote Video surveillance system implemented full time

- Specific Risk and Method Statement for the activities

b) **Asbestos**

- As per general view during construction is not admitted the use of material containing asbestos (ACM). ACMs could be secured or removed prior to the work commencing and Contractor must keep under control all the prevention measures, legal authorizations for removal, transport and final disposal. The exact method may vary depending on many factors but it will be subject to applicable Law. Contractor must notify promptly to Principia Energy every ACMs found in the Work Site and, if required by Principia Energy, a proper investigation campaign and sample analysis on existing material/building/soil shall be performed by the Contractor before starting with activities on site.

c) **Sandblasting**

- The potential Hazards during sandblasting operations include, but are not limited to inhalation of dusts (including lead from the paint or silica from the blasting medium); high noise levels; high operating pressure of equipment; etc.
- The following requirements to minimize the possibility of an incident during sandblasting operations must be included in Contractors program:
  - Approved respiratory and hearing protection shall be worn.
  - Appropriate eye protection shall be worn, in any case an eye wash shower shall be present in the area
  - The use of silica sand in the blasting medium is discouraged.
  - Paint coatings being removed by sandblasting operations shall be considered as lead containing until proven otherwise.
  - Check all hoses every day for leaks and signs of wear.
  - Disconnect and lock out all electrical power before sandblasting.
  - Blasting nozzles shall be equipped with a cut-off device (dead man's switch).
  - Secure and hobble all high-pressure air hose connections.
  - All air hose connectors shall be pinned or wired to keep them from coming apart.
  - Warning signs shall be posted identifying potential Hazards.

d) **Painting**

- The potential Hazards during painting operations include but are not limited to inhalation of toxic vapors or spray mist, fire Hazard due to solvents in the paint, environmental impact etc. The following are requirements to minimize the possibility of an incident during painting operations and must be included in Contractors program:
  - Approved respiratory protection shall be worn;
  - Approved eye protection shall be worn, in any case an eye wash shower shall be present in the area;
  - Be aware of and eliminate ignition sources in the work area;
  - Ventilation (either mechanical or natural) shall be adequate to keep the work atmosphere less than 10% Lower Explosive Limit (LEL) and the oxygen (O2) content greater than 19.5%;
  - Bleed or de-pressure all lines before disconnecting;
  - Warning signs shall be posted identifying potential Hazards;
  - Contractor is responsible for complying with local act concerning the Volatile Organic Compounds (VOCs) limits, training, selection of equipment cleanup and surface preparation solvents, recordkeeping, emergency and disposal. Contractor shall prefer to purchase paints/solvents with the lowest VOCs content as long as reasonably practicable.

15.5 PROTECTION OF THE ENVIRONMENT

a) **Environmental Hazards**

- Possible Emergencies causes are:
  - Spills of pollutants (oil, fuels, waste waters, etc.),
  - contamination of polluted water, white and black waste water
- An emergency procedure for chemical spills or other potential incidents shall be developed.
- All sensitive sites will be identified such as rivers and wetlands and procedures developed to ensure proper handling of oil/fuel or chemical spillages in these areas. It will be ensured that all employees are aware of the procedure to be followed in case of accidental spills and leaks. It will be ensured that the necessary material and equipment for dealing with spills and leaks is available in the working area at all times. All employees will be trained to handle all accidental leaks and spillages on site appropriately.
- To minimize the risks the preventive measures reported in this document about sources of possible contamination should be performed at the worksite areas.

b) **Animal hazards**

- Contractor and sub-Contractors shall consider the risk of animals, such as snakes, reptiles, spiders and wild animals in their emergency plan and implement all the reasonable measures to avoid it. Principia Energy requires a preliminary assessment of the most common animals present on site. In case of presence Principia Energy may require:
    - Procedure to follow in case of snake's bite or animal's attack (reference person to call);
    - Training on all the workers regarding the animals' procedure;
    - Appointments of valid, trained persons in charge for first aid in case of snake's bites and safely handle/capture reptiles;
    - Use of appropriate PPEs;
- In case of presence of wild dangerous animals, the Contractor is required to take all the reasonable measure to avoid the risk, such as:
    - Procedure to follow in case of wild dangerous animal's attack (reference person to call);
    - Training on all the workers regarding the risk and the measures implemented;
    - Agreement with a trained animals' wrangler, to assist the Contractor in the management of the wild animals' presence;
    - Use of appropriate PPEs;
- Provide a full time surveillance patrol (especially before the erection of the fence).

c) **Air emission and dust**

- The main problems induced by the atmosphere are dust generation and gas and particulate emissions. These impacts are related to excavation/demolition activities and to transit of heavy vehicles. Air Quality Sampling shall be ensured by Contractor in order to check conditions on site.
- To prevent dust emission from vehicles ensure that all vehicles entering or leaving the site carrying a load that may generate dust are covered, except during loading and unloading. Install, operate and maintain dust control measures and/or equipment in the areas in which the risk is identified (such as mobile water tankers equipped with a pump and sprays to suppress dust from unsealed roads or storage area or consider windy days in the plan of the activities); lastly vehicles must respect law speed limits, if any, and must move at low speed in work site. Loose soil is to be compacted as soon as possible after excavation, grading or filling;
- To prevent gases and particulate emissions use vehicles equipped with catalytic mufflers, particulate filters for diesel engines and keep under control and maintenance all the vehicles used.
- In order to reduce the consumption of fossil fuel used by the generators, according to Principia Energy request, Contractor shall provide and install within the site, a small photovoltaic system for the energy needs.

d) **Water Management**

- Contractor shall ensure that:
    - All the withdrawals are used only for the purpose of the authorization;
    - There is a regular monitoring of all the permits for water discharges and water withdrawals according to local Act and/or authorization;
    - Erosion control measures and treatment device are installed before starting the worksite in order to minimize the threat of flooding and loss of rich nutrient soil and maintain the flow regimes of any water courses and prevent any deterioration in water and soil quality;
    - Drainage trough from areas of disturbance is designed to minimize surface flow velocities;
    - Adoption where possible of a recirculation system for waters that allows the reuse of the treated water in the production process;
    - Loose soil is to be compacted as soon as possible after excavation, grading or filling;
    - Cleaning of equipment and flushing of mixers must occur in designated wash bays (with contaminated water collected, stored / contained) to ensure that contaminated wash water does not enter the environment;
    - Water Quality Sampling shall be ensured by the Contractor in order to check condition on site. At least, every two months the sample shall be provided by the site camp contractor responsible.

e) **Noise and vibration**

- Particular attention should be given in evaluating noise and vibration impacts. The activities that generate the greatest contribution in acoustic terms are in general: demolition, excavations and earthworks, concrete and cement production. Contractor and Subcontractors must ensure that the limit listed in the applicable Law are adhered to and measures to limit noise from the work site are implemented.
- Hearing protector's distributors shall be available on site where the presence of such activities is.
- Contractor must put in place these control measures:
    - machines and apparatus construction must comply with the latest technical developments (ex: vibratory driver high frequency);

- Periodic maintenance of machines and equipment with internal combustion engine according to the manufacturer's instructions;
- in the choice of the location of the machines and stationary equipment must be privileged maximum distance respect to who is sensitive to noise;
- Noise and vibration measured outside the site must be in compliance with applicable Law minimizing the impact on sensitive targets;
- Installation of provisional acoustic panels;
- Noise emissions check shall be ensured by Contractor through fixed and portable measurement on site.

15.6 WARNING SIGNS

- The contractor must ensure the placement of enough site signalizations on site. Minimum requirements are:
  - Worksite Project information panel at the entrance;
  - Use of PPEs;
  - Speed limit;
  - Speed bump;
  - Emergency Assembly point;
  - No smoking area;
  - Danger signal;
  - Signalization of eventual underground or air pipes crossing the site;
  - Emergency equipment.
- Signals must be understandable to all the workers.
- Contractor shall provide and install on the Work Site an emergency sound alarm system with multiple sources if necessary according to site extension.

15.7 COMMUNICATION SYSTEM

- Contractor (i.e. EPC Contractor or BoP Civil Contractor) according to the H&S Plan shall ensure a fully functional system of communication within the Work Site. No dead zone shall be present on Work Site including road access: in case of working area with no mobile phone coverage a satellite mobile phone, a Wi-Fi network and/or a radio communication system must be implemented. Each Contractor shall ensure the equipment to maintain a direct line of communication between their safety officers, their supervisors, their first aid and fire fighter personnel.
- Contractor in Work Sites without cover by phone signal will have to provide and install in the Site Camp a free phone system on the Work Site reserved for workers.

15.8 ACCESS TO THE WORK SITE

- All Contractors must comply with the provisions given for Site Camp security as presented to other Contractors and Subcontractors before authorize the access. This service can be organized by Principia Energy directly or by a Contractor assigned by Principia Energy, and the responsible of the Site Camp's security shall implement a system to control the access to the Work Site of all, both of people and vehicles.
- Each gate will be equipped with an "access control system", guarded 24/7 by a security guard.
- Only authorized people and vehicles are allowed to enter on Work Site. Contractor Responsible for the Site Camp security shall ensure an access control on Work Site, aimed to verify possession of any weapons, illegal drugs and an alcohol tester.
- To the extent permitted by applicable Law, Contractor Responsible for the Site Camp security ensures that an alcohol and drug tester will be implemented at the main entrance. The alcohol and drug test can be implemented immediately when Work Site opens.
- Authorized people are those:
  - workers, with all the necessary documentation already checked and available on Work Site, trained in conformity with their duty on Work Site;
  - Site Manager, Foreman and HSE key people Principia Energy representatives;
  - visitors, cleared by Principia Energy;
  - public authorities as required by Law.
- All those authorized persons must wear an identity card/badge (with barcode type or similar devices), and their presence recorded on a dedicated daily electronic spreadsheet by the access control system. Attendance record must be submitted weekly to Principia Energy (mailing list to be communicated) and available to be consult o site an update list with the actual status by emergency reasons.
- Authorized vehicles are those checked by the Parties on their good maintenance and order. Authorized vehicles must be identified with proper label, and their entrance recorded on a dedicated daily electronic spreadsheet by the access control system. The drivers of those vehicles which are authorized only for the pit in the main storage area, are not allowed to stand on the Work Site, unless they received a HSE Induction and they wear the appropriate PPEs.

- Contractor for Site Camp security shall control access of all other Contractors', Subcontractors' and suppliers' vehicles and their access must be registered on a dedicated log vehicle.
- Work Sites in operation are not guarded but controlled by a Surveillance System managed by Principia Energy Security and are protected by an anti-intrusion system so the access gate shall be maintained constantly closed.
- In case the Work Site is realized internally to an existing Plant the "Access Control System" shall be based inside and at the entrance of the Power Plant.
- If permitted by the applicable Law with the aim to increase safety, Contractor shall implement a video surveillance system that cover the site/work area with more presence of people like canteen, recreation area, main entrance, waste management area, explosive storage (if any).
- All visitors shall obtain permission to enter the Work Site at the Work Site office and/or Contractor office before entering the Work Site Contractor. A Work Site visitor log shall be maintained. All visitors shall conform to the minimum PPE required at paragraph 15.2, in the HSP, whichever is more restrictive. All visitors shall be notified of the potential Hazards and the Work Site safety rules and shall be accompanied at all times while on Work Site.
- Safety officer shall explain in a HSE Induction: All receive a document, a Safety Flyer with the main information of the Work Site with the indication of the major hazards, the free zone and the escape route, the safe meeting points and with all the relevant contact details of the key people; emergency first aid staff, fire staff, safety officer, Work Site Manager, etc. Record of the induction, signed by the visitor must be kept on Work Site.

15.9 FACILITIES ON SITE CAMP

- Contractor must consider these requirements described below in this paragraph as a further warning in order to complement the requirements required in the E&C technical specification called "Construction Site Camp" and annexed to Contract. Therefore Contractor must define a proper offer for "Construction Site Camp" technical specification.
- Each Contractor has to provide all the facilities on the Work Site as requested by applicable Law and Principia Energy's prescriptions.
- Contractor (i.e. EPC Contractor or BoP Civil Contractor) can be required to provide at the Work Site or within reasonable access to the Work Site:
    - Sanitary facility for both sex;
    - Changing facility for both sex;
    - Sheltered eating areas, sized with the number of workers on site;
    - Sheltered areas for trainings and meetings;
- Those trailers/rooms must be in place at the very beginning of the activity, equipped with internet connection, lights, air conditioning and with a proper housekeeping, from the start of the project. Contractor and all other Contractors must ensure lights, air conditioning from the beginning using the temporary generators if necessary.
- Each Contractor might be requested to provide portable toilets and gazebo for area relax with drinking fresh water on site (bottled or dispenser), to be distributed on the different area of the site, in proper container, sheltered from the start of the project and the end of it (Considering all the pre-activities performed).
- All Contractors shall keep proper housekeeping of their respective work area and one Contractor will appointed by to keep clean all the common areas like Principia Energy rest areas, common toilets, meeting rooms, etc.
- In case of particular event like visit of authorities, third parties, high-level visitors or adverse meteorically events, Principia Energy reserves the right to ask Contractor for an extraordinary cleaning service before or after the extraordinary events.
- Contractor must provide and install a lighting system with a twilight sensor in all the crossing inside the site, in the parking areas and outside. The Contractor responsible for the construction of the site camp and other facilities, has to consider and update (or provide if not existent) a Lightning Study and consequently shall install according to the study results a lightning Protection System on site in order to ensure full worksite protection.
- Contractor in his enclosed buildings of the Work Site, must provide and install a smoke detection system. In case needed, Contractor in his enclosed buildings of site, must provide and install an ultrasonic rodents-repeller.
- The catering Contractor (if any) must have a procedure according to the HACCP (Hazard Analysis & Critical Control Point) protocol in order to guarantee an adequate hygienic degree with regard to all processes involving food: manufacture, processing, packaging, storage, transport, distribution, preparation, handling, sale and deliver.
- In operational plants, Contractor and Principia Energy will agree the facilities needed and the use of facilities already in place before start the activities in order to rationalize cost and resources. This point is not applicable for garbage and industrial waste collection facilities and along the entire pedestrian walkways on the site camp.

15.10 TRAFFIC MANAGEMENT

- Contractor shall set a procedure that has to describe the rules and preventive measures for traffic movement, including approaching and parking near mobile equipment. It shall include key responsibilities and the processes to operate on site and speed limits for employees, visitors and general public. The traffic management plan shall be done in accordance to the applicable Law, Authorizations and to the requirements below:
    - Enough and visible signs shall be utilized on site where travel ways are changed due to various circumstances (road restriction, obstacles on site);
    - Speed limit: 30/20/10 km/hour in the internal roads (depending on the condition of the roads), 20 km/hour around logistic area, in all car parks and yards. Speed limit sings shall be placed on site and near pedestrian area (i.e. canteen, offices) a speed bump shall be placed. Speed limit can be modified only after evaluation with Principia Energy;
    - Irrespective of signage, speed should be restricted to suit weather, visibility and road conditions prevailing at the time. Following distances shall be increased and speeds shall be decreased to a maximum of 20 km per hour in inclement weather such as mist (fog), rain, hail, thunderstorms or any similar difficult conditions such as dust or high wind speeds;
    - Communication between vehicles and machinery which need to interact is of most importance. Drivers must follow communication procedures and shall, where applicable, be trained in the correct use of two-way radios. Hand signals (Waving arms) to be used to draw attention of operator. The use of mobile phones while driving a vehicle are prohibited;
    - The temporary park on site shall be well recognized using reflective cones, intermittent lights or other signals (visible also during the night);
    - The parking on site shall be well defined with a clear separation of the heavy machinery, trucks, personal vehicles, etc.;
    - The parking and the vehicle circulation roads shall be well defined and separated of the pedestrian areas such offices, paths, pedestrian crossing areas, etc.;
    - Reverse parking must be applied on site at all times
    - In case of cable crossing the internal road shall be placed a cable protection ramp.
- Contractor shall take all the reasonable measures to manage and reduce the interferences with the local traffic. The presence of site activities must be highlighted with proper number of signals. Flagmen can be required in order to manage the traffic of site and local vehicles, in case the traffic shall be temporary interrupted, the use of mobile traffic lights is recommended.

15.11 EXCAVATION AND TRENCHING

- An excavation is any man-made pit, trench, holes or cut into the ground formed by the removal of earth. All excavation and trenching operations shall be performed under the supervision of the Foreman and all requirements including excavation plan and the material disposal authorization shall be met.
- As Built drawings for all existing power lines, underground pipelines etc must be available and taken under consideration during risk assessment and before commencement of activities
- Excavations must be carried out and protected with measures aimed to avoid falls, dislodgment of materials, person buried or trapped in;
- Excavation must be fenced with strong, visible, robust fence. No load or materials must be left on the edge of the excavation;
- Sides of excavations must be clean and neat;
- Drilling holes must be covered, signalized and fenced;
- Locations of cables, communication wires and other underground Hazards such as pipelines shall be established and marked prior to beginning excavation or trenching operations;
- In case of excavation at the edge of a track/road, that has an impact on the movement of the vehicles, the traffic must be managed with two flagmen or with traffic lights;
- It's required a schedule, to be updated with the progress of the activity, of the excavated soil and the re-used soils, if authorized by local Authority;
- If an excavation or trench endangers the stability of buildings or walls, shoring, bracing, or under pinning will be provided;
- All excavations must be on a register and inspected daily before work commences and after inclement weather by Contractor, declared safe and his findings noted in the register/logbook;
- No work shall commence in an excavation unless the excavation has been declared safe by the Contractor and authorized by Principia Energy.

15.12 HOT WORK ACTIVITIES

- Hot work is defined as welding, flame cutting, burning, grinding or using a torch. Each Contractor working on Site must have an

approved Permit to work, according to the Hot Work Program.

- Generally hot work should be performed in a shop, outside the facility, or in a "Safe Welding Area" ("SWA"). If not possible a SWA shall be established on Work Site, implementing the measures listed below:
    - All welding and flame cutting operations shall be done in the established SWA unless otherwise authorized.
    - All welding operations shall be done by licensed welders according to the Greek Law (PD 115/2012)
    - SWA's shall be located with a safety distance from heavily vegetated areas, combustibles (stored oil, diesel, etc.), and on a non-combustible surface. If there are oil and gas facilities in the immediate vicinity, such as pump jacks or pipelines or tank batteries, SWA's shall be at least one hundred 35 m away from such facilities.
    - If hot work needs to be performed, all movable fire Hazards in the vicinity shall be removed to a safe distance or guards used to confine the heat, sparks and slag and to protect the immovable fire hazards.
    - The hot work equipment and work area shall be inspected prior to beginning any hot work operations to ensure safe working conditions. This includes checking for explosive atmospheric conditions in all vessels piping and confined spaces. Only certified personnel/welders shall be permitted to perform hot work.
    - When performing hot work all the fire protection must be taken and reported in the "Hot Work Program". (i.e. Fire extinguishers equipment, fire watch after competition of hot work, water truck if there is potential for the spread of fire)
    - Operators shall wear brominated uniform and get a person with fire blanket and fire extinguishers ready for the use;
    - Regarding windfarm it must be stressed that inside a nacelle the use of all welding and flame cutting operations is forbidden.

15.13 WORK AT HEIGHT

- Work at height means work activity (including temporary works like load unload) exposing workers to the risk of falling from a height of more than 1,5 m from a stable level. The risks involved in work at height can be linked with the following categories:
    - Falls from height
    - Objects falling from heights
    - Interferences
- The following are key rules for safe working and to minimize the possibility of an Incident during operations at height:
    - Only trained/certified personnel should perform work at height activities
    - Identify and use the most appropriate equipment in relation to the work to be performed and the risks involved
    - Install scaffolding in compliance with legislation and good practice.
    - Always clearly define the work area
    - Prevent transit below the area and ensure proper handling of materials at height
    - Use PPE and CPE correctly

a) **Fall lifeline**

- Where is not possible to eliminate or isolate fall from height risk Contractor shall design and install a fall protection system.
- The fall protection system and fall prevention equipment shall be inspected and maintained in accordance with the manufacturer's recommendations and at the frequency required by the Law. Contractor shall:
    - Provide training and step-by-step instruction for installation
    - Perform the final and periodical inspection of the system
    - Perform any required load testing
    - Provide end user training
    - Provide all documents certificate required by the Law
- The length of the retention ropes must be proportionate to the height of the fall and its anchor points shall be placed in a highest point, and in case of moving, with double anchor point. Moreover, in case of use of rigid or flexible anchorage line, that must be adequate for the maximum worker's number.

b) **Guardrail / Parapet**

Guardrails/Parapets are designed barriers erected to prevent workers from falling to lower levels for instance installed in proximity of an excavation area and shall be secured when installed to prevent accidental displacement by wind, equipment, or workers, etc.

c) **Scaffolding and mobile scaffolding**

- Scaffolding shall be used when appropriate. All scaffolding shall be erected according to the applicable Law. A competent and certified person must be appointed responsible for scaffolding. If the scaffold has a different shape from the one calculated and certified a dedicated design shall be done. Any Contractor using or constructing scaffolding must have a safety procedure for scaffolding work that includes the items below:
    - Contractor shall maintain update a register with a map of all scaffolding on site, an appropriate tagging system specifying the status (Assembled/Safe or Under assembling/Unsafe); List of personnel appointed by Contractor for the assembling, use and dismantling of

the scaffolding. (Check of scaffolding at the beginning of each shift);
- Instructions for assembling and dismantling;
- All scaffolding shall be inspected by Contractor on a daily basis as a minimum and also before use follow adverse weather conditions that could have made the scaffolding unsafe e.g. rain, wind which could cause the ground conditions to be unstable. The maximum load shall be indicated at the entrance. Each inspection must be recorded;
- Scaffolding users shall carry out visual inspection daily before use. If unsafe conditions are found or suspected, scaffold shall be isolated until thorough inspection has been made by competent inspector;
- Scaffolding shall be electrically grounded for each 20 meters high with a minimum cross section cable of at least 25 mm2; all scaffolding must be assembled with homogeneous and resistant materials. Where scaffold materials are used, they shall be clean and corrosion free and free of incipient faults. Scaffold boards will be free from twists and splits and will not be painted;
- Climbing or working from the handrail, mid-rail, or brace members of the scaffolding is forbidden;
- Scaffolding and mobile scaffolding must be in good condition, placed in a stable position (with platform completed, toe boards, middle-rail and top-rail at 1.2 m);
- Scaffolds that provide access to areas where personnel can fall into a Hazard or from a height of greater than 1.5 meter shall install a trap door at the access point to working area;

15.14 MATERIALS LOADING/UNLOADING

- All loading and unloading operations must be accompanied by the lifting plan. The transported loads must be pre-arranged with attachments and slings to avoid worker exposure to the risk of falling from above.

15.15 CONFINED SPACE

- A "confined space" is defined as a space (not necessarily closed) not intended for continuous human presence, with inlet/outlet openings or premises/passages of small dimensions (which cause difficult emergency management) where a Hazardous atmosphere can be suspected.
- Confined spaces, for example, include: storage tanks, silos, underground systems, tunnels, drainage pipes, condensers, feed water heaters, underground vaults, chemical tanks, cavities, boilers, blades, hub, etc. Such spaces may present unfavorable ventilation conditions or other risk factors such as poor visibility and/or communication difficulties, the presence of Hazardous and/or flammable and/or explosive materials.
- The atmosphere in confined spaces may involve risks (e.g. both toxic and explosive) without warning signs such as strong smells or irritating effects. These areas of work require the installation barriers and safety signs to prevent unauthorized entry
- The following are key rules for safe working and to minimize the possibility of an incident during operations in confined spaces:
  - Clean up the area (purging, inserting, flushing, or ventilating the work area) as necessary to eliminate or control atmospheric hazards before starting activities and monitor safety conditions;
  - specifying acceptable entry conditions and monitoring safety conditions throughout the duration of the activities;
  - Verify the availability of Communications equipment, Lighting equipment, rescue and emergency equipment;
  - Do not enter in a confined space until all necessary checks have been carried out;
  - Personnel involved must be educated and trained on use of required PPE and collective protective equipment;
  - Continuous communication with the worker inside confined space must be assured.
- Additional measures for monitoring the air quality have to be provided by Contractor

15.16 ELECTRICAL SAFETY

- The HS Plan shall address and minimize personnel exposure to electrical Hazards through effective equipment operation, design, specification, installation, and maintenance. All electrical Contractors working onsite shall have an electrical safety program, including a permit to work process, which meets the requirements below.
  - Electrical Safe Work Practices: All electrical work shall be done in accordance with the latest codes, standards, and regulations;
  - Only qualified personnel with valid proof or certificate of electrical knowledge with code requirements, safety standards, and experienced in the type of work may work on electrical circuits and equipment according to PD 108/2013;
  - All live electrical work requires a live work permit. A qualified person shall discharge all stored electricity and shall verify the equipment is de-energized and proper Lockout/Tag out procedures implemented prior to beginning electrical work;
  - Power Lines: All power lines shall be considered energized unless proper measures have been taken to de-energize;
  - When work is performed near energized overhead power lines, equipment such as boom, mast, crane, or its load shall never be permitted within evaluated distance limit from the power lines.
  - The following 5 golden rules must be always respected:
    1. effective cut-off of all sources of voltage
    2. interlocking or locking of cut/off devices
    3. verify absence of voltage
    4. grounding and short circuit

5. sing post the working area

15.17 COMMISSIONING ACTIVITY

- The commissioning activity is one of the most complex and difficult activity both from the organizational and operative point of view. Before carrying out any operation on electrical systems or other activities nearby, a risk assessment must be carried out. This assessment must specify how the activities performed and what security measures and precautions should be taken to ensure safety.
- All personnel involved in work on or near electrical installations must be instructed on the safety requirements applicable to their work. The personnel involved must comply with these prescriptions, rules and instructions.
- In particular:
  - No person shall be admitted in the Commissioning restricted area if not authorized. A list of authorized persons shall be displayed at the entrance of the Commissioning area. Warning signs informing about electrical Hazard and allowed entrance only for authorized personnel shall be placed;
  - The commissioning activities shall only be carried out by qualified personnel, should be considered as electrical activities and shall not be performed without Principia Energy's approval.
  - Qualified personnel must be trained and have a qualification that meets the standard indicated in (a) Permit To Work, (b) LOTO procedure and (c) any other applicable procedures,
  - No person shall be engaged in any work activity requiring technical knowledge or experience to prevent electrical Hazards or injuries without such requirements and without the supervision that the work requires.

15.18 CONSTRUCTION OF MEDIUM AND HIGH VOLTAGE AERIAL LINE

- In order to ensure adequate safety standards for employees involved during the construction and safe use of tools and machines, the following, and for further detail defined in the general criteria, should be applied during the construction of MV/HV overhead lines.
- The construction of an overhead power line is one of the most complex and difficult activities both from the organizational and operative point of view. The multiple interferences that may be arising along the route of the power line (power and telephone lines above ground or below ground, buildings, roads, rivers, etc.) linked to the morphology of the territory and climatic conditions, greatly increases the specific risks related to the activity.
- Contractor shall therefore ensure that the following conditions are met:
  - The employees involved in the activities must be highly skilled, trained and suitable from health point of view (occupational doctor medical certificate should be available);
  - Tools, equipment and PPE used must be suitable, efficient and checked before and after use. In case of any deformation or weak points (cracks, fractures or other defects), the tools must be immediately replaced;
  - In the case of aerial line activities, work at height training certificates should be available for the personnel.
  - The main Hazard for the employees involved is falling from height, which can be managed adopting proper behavior, using proper equipment and PPE's and respecting the work procedures. The risk of falling objects is constantly present and should not be overlooked;
  - Minimize the interferences between workers working at height and those positioned at support base;
  - All equipment used at heights must be secured with ties or chains to prevent an accidental fall to the ground.
- To ensure adequate emergency management and considering that the construction of high-voltage lines generally takes place away from the site camp medical center, it is important to ensure on site or in surrounding area, trained first aid team.
- The safe execution of the works on MV and HV overhead lines requires work planning, activities coordination among the employees involved, respect of operating procedures and use of proper equipment and PPE.

15.19 OVERHEAD POWER-LINES / UNDERGROUND PIPELINES / ABOVEGROUND FLOW-LINES

- In case of transmission line crossing on site and/or access road, Contractor must put in place any reasonable measure aimed to avoid any kind of risk of crush with vehicles (barricading, gates, etc.). Below the minimum requirements:
  - As Built drawings for all existing power lines must be available and taken under consideration during risk assessment and before commencement of activities
  - Identification of the height of the line;
  - Establishing of the limit height for a safe cross;
  - Placement of portal before the rail or PL crossing;
  - Warning signals to be erected and visible (e.g. goal posts);
  - Specific Safety Awareness/Tool Box Talk meeting about the topic.
- In case of underground pipelines point out their presence, to avoid any accidental hit. In case of risk of explosion and/or leakage of

chemical materials the presence of fire fighter or skilled personnel of the provider could be required.

15.20 WORKS ON PUBLIC ROADS AND TRAFFIC INTERFERENCE MANAGEMENT

- "Road Works" are all the activities that represent an anomaly for ordinary roadway.
- The contractor, during the evaluation of road works activities, must take into consideration the specific risks including, but not limited to, the following safety risks:
  - workers involved in the construction activity, both in the specific work topics and for the vehicular traffic interference;
  - people and vehicles passing near the works site;
  - type of road and the type of traffic;
  - eventual interactions between the different components of permitted traffic (eg public and / or private transport, residents, pedestrians);
  - interference with existing roads;
  - impact with people outside the works sites and with vehicles;
  - projection or material fall during working phases.

- The contractor is obliged to comply with the main rules to promote safety and to minimize the possibility of accidents during operations.
- Below reported in non-exhaustive list:
  - Initial point of the work must always be promptly pre-signaled and guaranteed with solid guards;
  - In relation to the work type and the road category, the most suitable type of pre-signaling must be identified and agreed (for example, flag with one or more operators, mechanical flagman, timed traffic light systems, message panels, luminous devices or similar devices, pictograms,etc).
  - At the start and the end of work site, the signaling must indicate the preparation of adequate approach, position and prescription;
  - The contractor is obliged to ensure solid protections for vehicles and operators involved in the activity (with metal barriers and / or new jersey), at the start and the end of work site;
  - Excavations must be protected by fences and barriers to be placed for each individual part;
  - Adequate flexible marking and / or delineators must be used to the entire part affected by the activities;
  - The contractor is obliged, except in exceptional cases and in any case agreed with the Principia Energy, to close the excavation sections at the end of the working day;
  - The contractor, even at night, is obliged to diligently remove any deposit or waste from the road section;
  - The contractor, even at night, is obliged to provide adequate regulatory danger signals (including luminous devices or similar devices), as well as solid shelters to ensure public safety;
  - The contractor is obliged to efficiently maintain the prescribed signals during the works.
  - It is mandatory for supervisors and workers to receive specific training in compliance with the local laws and standards;
  - The contractors shall provide workers with personal protective equipment (PPE) compliant with the reference standards. High visibility clothing must comply with the local laws and Principia Energy requirements.

15.21 PERMIT TO WORK

- From a general point of view the Permit To Work (PTW) is a formal recorded process adopted to ensure the proper planning, organization, sharing, tracking and initiation of work that is identified as potentially hazardous.
- The PTW is also a means of communication between site/installation management, supervisors, plant operators, and the work performer.
- The essential features of PTW are:
  - clear identification of the type of work (hot work, work in confined spaces, work at height, electrical work, Work in proximity of energy sources such as pneumatic, chemical, electrical, cold/hot commissioning etc.)
  - clear identification of the roles involved in work authorization (and limits to their authority) and who is responsible for specifying necessary precautions
  - Identification of the risks of the area
  - Identification of the risks related to the activity to be performed and prevention measures to be adopted
  - Interference risks (simultaneous activities on site) and prevention and control measures to be adopted
  - Allowable duration of the activity
  - Safe behaviors to be adopted during activities
- The process and information related to PTW is formalized through a specific form. Supervisor, Authorizer and Executor has to keep

their own copy of the PTW. Any changes must always be tracked on all copies.

- The PTW must not only refer to the need to isolate energy sources, but must also provide indications regarding the preliminary operations and the risks present in the area of the activity to be carried out.
- PTW must be used whenever the activity to be performed may adversely affect the health and safety of personnel.. Under the conditions mentioned above, the use of a PTW must be considered, at least, in the case of:
    - maintenance, repair, inspection of machinery or confined spaces, tests, fuel management, waste management, etc.;
    - non-routinary, not planned or schedule changed activities;
    - special works (electrical works, work in potentially explosive atmospheres, confined spaces, hot work, special work at heights, hot/cold commisioning, etc)
    - work in which two or more individuals or groups must coordinate activities to safely complete the work to avoid interference situations;
    - work in which activities and responsibilities are transferred from one group to another
- Furthermore, specific works, due to their nature and hazardousness, may be subject to mandatory standards/procedures (ex: Confined spaces, fall from height, lifting activities, etc), requiring adequate preparation, equipment, planning, forms to be completed (e.g., electrical works, work in potentially explosive atmospheres, confined spaces, hot work, special work at heights, lifting activities, etc.). The information included in these procedures must mandatorily supplement the information required within the PTW.
- In order to achieve the above objectives, the process of defining and releasing the PTW must be carried out using standard forms through which systematically manage the activities foreseen from all points of view (procedural, responsibilities, safety, roles, etc.).
- The process to approve a PTW will be the following:
- The PTW must be signed by the Principia Energy Supervisor, Authorizer (Principia Energy Energy Control Coordinator), and the Executor (PTW applicant and Work Responsible) specifying Date and hour of signing.
- According to organizational conditions, the Authorizer and Supervisor roles can be covered by the same person, while the Executor must be different.
- The work can start only after the approval of all the above figures. If between the PTW definition and Approval some roles have changed (ex: Supervisor or Authorizer working in shift) the figures approving the PTW are accepting all the contents defined in the previous phases.
- The delivery of the work area (handover) must be done through a detailed verification of the implemented safety measures, done jointly by the Supervisor and the Executor.
- Before concluding the handover, the Supervisor should inform the Executor of the hazards still present in the work area, indicating what nearby equipment is in operation and the nature of the hazards, such as pressurized fluid, high temperatures, electrical fire hazards. If deemed necessary, the Executor may propose to the Supervisor, and through them to the Authorizer, additional controls or safety activities to make the areas safer.
- If the Executor is a Contractor, the Supervisor shall formally hand over the work areas to the Contractor's foreman, informing him of the risks still present on the work area, indicating what nearby equipment is in operation and the nature of the risks, such as pressurized fluid, high temperatures, electrical fire hazards.
- With the handover, responsibility for the work areas and equipment provided under the PTW is transferred from Site/Operations and Site/Maintenance to the Executor.

16 INSPECTION AND MONITORING

16.1 Principia Energy has the right to carry out inspections or audit to check and verify compliance with the Contract – including compliance with HSE obligations – and Contractor shall cooperate. Principia Energy's personnel and/or third parties authorized by Principia Energy shall have access at any time to Work Sites, Contractor's premises, warehouses or storage areas to carry out the above-mentioned checks and verifications. The inspection can also be intended as a virtual one, made with remote connection (web meeting, video call, etc.). The Contractor's Foreman has to ensure the connection with Principia Energy's personnel.

16.2 Principia Energy shall have the right to check the personal identification of Personnel (required by Section 4.3) at any time.

16.3 Principia Energy reserves the right to monitor the proper management of waste and of the other environmental aspects done by the Contractor.

16.4 Principia Energy reserves the right to verify the HSE compliance of Contract activities, to require the Contractor to record personnel presence,as well as video recording or photo recording of its Workers during the contractual activities in accordance with applicable Law on personal data protection and to the extent allowed by the intellectual property provisions in the Contract. In this case, Contractor will also cooperate with Principia Energy to define technological requirements, Workers training and relevant procedures and instruction.

16.5 For Contracts for services like restoration, cleaning, recreational room, security services etc. Principia Energy may provide a service satisfaction survey for collecting the feedback from the service users about HSE aspects. The Contractor, in agreement with Principia Energy, shall consider the results and implement improving actions.

16.6 The inspections carried out by Principia Energy or authorized third parties do not imply approval from Principia Energy or a waiver to Contractor, with regard the HSE compliance issues, of obligations and responsibilities connected to the proper performance of the Contract. The Contractor, as a preventive action, shall perform its own inspection of the activities in order to detect any non-compliant situation and then implement the necessary corrective actions.

16.7 If, during the inspections carried out by Principia Energy, non-conformity by the Contractor or by his Subcontractor is found, Principia Energy will notify the Contractor accordingly. The Contractor shall, within 5 business days, provide the clarification on the causes and/or the reasons which led to non-conformity and propose the necessary remedy measures (which shall be implemented within 3 weeks from acceptance of Principia Energy, unless a shorter period is required by Principia Energy), without entitlement to any schedule relief.

16.8 Whenever possible the detected non-conformity shall be immediately solved by Contractor and reported as solved in the HSE Non Conformity Report. In more complicated cases a time to implement a solution will be promptly agreed with Contractor and duly reported on the same Report.

16.9 In the cases where the failure to meet the requirements of HSE involves, in Principia Energy 's opinion, an imminent danger, which is understood as any situation that creates an evident and manifest damage risk to people physical integrity or the possibility of severe environmental harm or in case of not compliance with Law, Principia Energy may require the stop work until the problem is solved and Principia Energy considers safety and environmental standards have been restored to mitigate the risk. Subsequently Principia Energy requires to implement a remediation plan with execution timing to be agreed with Principia Energy.

16.10 For each non-conformity, the Contractor shall carry out a non-conformity analysis to track the recurrence of such non-conformity and assess the effectiveness of remedial actions taken. If the analysis demonstrates the ineffectiveness of the planned remedial action, the Contractor shall organize a different and more effective preventive action. Contactor shall present and agree with Principia Energy this improved corrective action.

16.11 Any violation/non-conformity detected as a result of controls and verifications are recorded by Principia Energy, with allocation of sanctions related to the severity of the violations/non-conformities identified, resulting in an eventual downgrade of the Supplier Performance Management (SPM) index.

16.12 The downgrade thresholds of SPM Index or the ascertainment of a number of HSE failures, may entail the adoption of the Contractor suspension provision from the invitations to tenders for a period that will be defined by Principia Energy, at its sole discretion.

16.13 In any case Principia Energy may call the Contractor or its HSE key people for a periodical meeting in order to discuss the status of Non Conformities found (by Contractor itself or following a Principia Energy's inspection) and the related Corrective Measures.

17 CONSEQUENCES OF BREACHES REGARDING HEALTH, SAFETY AND ENVIRONMENTAL REQUIREMENTS

17.1 REMEDIES FOR VIOLATIONS OF THE RULES REGARDING HEALTH AND SAFETY and ENVIRONMENTAL PROTECTION

- In the event Contractor breaches an obligation, provided by Law or by the Contract, on Health, Safety, Environmental protection, the Contractor shall indemnify Principia Energy for, and hold Principia Energy harmless for, any loss or expense that Principia Energy may sustain or incur as a consequence of:

a) any Accident; and/or any Environmental Event, and/or;

b) any claim or suit brought by the individuals or entities affected by the Accidents or Environmental Event, and/or,

c) any fine, penalty or sanction imposed by an authority to PRINCIPIA ENERGY by reason of the Incident or Environmental Event,

- In the event Contractor breaches an obligation on Health, Safety and Environemntal protection, Principia Energy, at its sole discretion, and to the extent not contrary to the applicable Law, may:

a) require the Contractor to implement a timely remediation plan to reinforce HSE measures (e.g. specific training courses) related to the HSE prevention and protection deficiencies identified, and/or

b) suspend partially or totally Contract performance or a certain activity (depending on the HSE breach), for a number of days which correspond to the seriousness of the violation – or until the verification of any adjustments or corrective actions taken to address the violation - without this giving the Contractor any right to extend the deadline for completion of the works or payment or compensation of any kind, and/or

c) in case of a breach or whenever the worker behaviour represents a risk for his/her own integrity or third parties or the environment, require his/her immediate removal from Work Site and his/her replacement, and/or

d) apply the sanctions set out in Section 17.3, and/or

e) suspend payment of sums due to the Contractor, to the extent of 10% of the amounts accrued at the time of the HS breach, until the Contractor implements the remedy measures, and/or

f) in the event of Fatal/Severe Accident/High Potential Accident or High Potential Incident or a Severe Environmental event, suspend the Contractor and/or its Subcontractors and/or Contractor's Affiliates from Supplier Qualification System, and/or

g) terminate the Contract according to Section 17.5.

17.2 CLASSIFICATION OF HEALTH AND SAFETY BREACHES

- Without prejudice to its right to terminate the Contract, as provided in Section 16.5 of these Terms and Requirements and without prejudice to its right to claim further damages, Principia Energy also has the right to apply, by notifying the Contractor by registered letter with proof of receipt (or similar instrument of communication with proof of receipt), the sanctions listed and quantified in APPENDIX 3 Sanctions for HSE violations" .
- If the breaches cause any Accident or High Potential Incident, as is reasonably in whatever way is ascertained by Principia Energy, that the Contractor or Subcontractor holds clear accountability on Health and Safety breach, Principia Energy reserves the right to apply - depending on the severity of the violation and/or injury and/or damage to persons - a sanction of up to 2% of the total (or maximum) contract value and in anycase not less than the amount defined for "VERY SEVERE (II)" breaches.[6]
- The amounts resulting from the application of sanctions shall be allocated, accordingly to specific Principia Energy's agreement (e.g. for improvement projects and programs dedicated to Health and Safety) and local legislation.

LIST OF SEVERE, VERY SEVERE AND EXTREMELY SEVERE SAFETY BREACHES

LIST OF SEVERE, VERY SEVERE AND EXTREMELY SEVERE BREACHES OF H&S ADMINISTRATIVE OBLIGATIONS

CATEGORY	BREACH	SEVERITY
Event reporting	Failure to transmit to Principia Energy (within 6 hours) any communication concerning Accidents and High Potential Incident at work.	**III**
	Failure to notify to Principia Energy (within 24 hours) Minor Accidents at work[7].	**II**
	Failure to submit a written notice of any Safety Near Miss, within 3 calendar days.	**I**
General Provisions	Failure to participate at coordination meetings (if mandatory according to Law and/or Contract and/or these HSE Terms and Requirements).	**I**

LIST OF SEVERE, VERY SEVERE AND EXTREMELY SEVERE BREACHES OF H&S OBLIGATIONS RELATED TO ACTIVITIES

CATEGORY	BREACH	SEVERITY
General Provisions	Workers within the work area are not clearly identified and they do not coincide with the roles and names authorized listed in the work documentation: (areas delivery, registers, etc.).	**II**
	Fire-fighting equipment and first aid and recovery equipment for an injured person are not present, they are neither suitable nor efficient.	**I**
	The foreman in charge of the works on site is not identified and present on field and does not supervise the activity.	**III**
	The staff has not the professional profile/professional competence required for the work in progress, e.g. electrical work, work at height, confined spaces, etc.	**III**
	Risk assessment is not available (risks present in the workplace, the specific risks of the activity interferences for ex. Electrical lines, mechanical works, etc.).	**III**
	PPE and CPE available in the work area; they are neither efficient nor suitable (marked/certified according to the reference standard).	**II**
	PPE specific to current activities are not worn and used correctly.	**II**
	The equipment available in the work area is not adequate, kept undamaged, functioning, certified, periodic checks, there is not availability of installation, use and maintenance instructions.	II
	The work equipment (e.g. tools; vehicles) is not used correctly.	**II**
	Vehicles/machinery (trucks, cranes, excavators, baskets, etc.) are not authorized and adequate for the job, maintained, undamaged, functioning, certified, checked according to the periodic legal checks.	**II**
	Tools, Vehicles, construction site machinery (trucks, cranes, excavators, baskets, etc.) are not authorized, correctly used and stable with respect to the ground (if owned by Principia Energy they have beenformally delivered to the contractor).	**II**

[7] Excluding commuting Accidents

CATEGORY	BREACH	SEVERITY
	The emergency plan is not available, suitable for the type and extent of the works, complete and easy to implement with indication of escape routes and collection points.	III
	Telephone numbers for emergency reporting are not clearly indicated within the work areas and at the telephone/door phone stations. They are also not easy to use and functional.	I
	Visitors are not accompanied at any time and do interfere with the ongoing activities.	I
	The Permit to Work for area/plant delivery is not issued, managed and respected.	III
	Working procedures/methods are not available for activities.	II
	The activities with generic risk and/or different from the specific/prevalent one (e.g. electric work, work at height, confined spaces, etc.) are not carried out according to the standards, the Principia Energy working methods and the HSE contractual requirements.	II
	Not full application of the instructions provided by safety signs.	I
	All personnel involved in the activity do not know "STOP WORK POLICY".	I
	Weather conditions are not suitable for performing the planned activities.	I
	Workplaces are not maintained in such clean condition and substances/materials storage is not adequate.	I
	Workers are not highly visible in all levels of light wearing high-visibility reflective clothing/PPE (e.g. in the presence of vehicular traffic, in conditions of poor visibility).	II
	Loading and unloading areas are not adequate in terms of space and ground conditions.	II
	The work site is not delimited (also towards third parties), neither provided with suitable signs, clearly visible, illuminated.	II
	Presence of existing underground facilities, cables, pipelines, explosive device and other interfering items has not been investigated and reports are not available.	III
	All vehicles (moving/compacting/lifting, etc.) with obstructed view operate in reverse gear without a reverse signal alarm (optic acoustic alarm) or there is not a flagger designated, for safe traffic management.	II
	The LO-TO (Log Out, Tag-Out) system is not applied and, in the presence of more than one activity on the same systems, it does not provide for multiple blocks.	III
Electrical Risks	The disconnections of the power sources have not been made.	III
	Disconnect locking devices are neither effectively applied nor signaled (Control Lock, Personal Lock, Tags).	III
	The required grounding and short-circuit devices have not been applied correctly on the working area.	III
	The specific check to verify the absence of voltage has not been carried out.	III
	The required equipotential/continuity devices have not been correctly applied.	III
	Protection of the possible adjacent live parts (distance, barriers, etc.) and of the work area has not been carried out.	III
	The standards, operational procedures and HSE Terms and requirements are not respected for the electric activitiesbeing performed (dead line or live line).	III

CATEGORY	BREACH	SEVERITY

	PPE for protection against ELECTRICAL RISK is neither worn nor used correctly (indicate the PPE concerned in the "Notes": dielectric gloves of the appropriate class, face shield etc.).	**III**
	The PPE for protection against ELECTRICAL RISK available on site, are neither efficient nor suitable (complete, intact, marked/certified in accordance with standards/reference standards, etc.).	**III**
	The equipotential/continuity devices, available on sites, in use or to be used, are not suitable (with not markings conforming to the standard, complete, intact, etc. - report in the "Notes" which).	**III**
	The insulated tools/equipment available, in use or to be used, are not in good condition (not suitable for use, complete and intact - report in the "Notes" which).	**III**
	The devices for verifying the absence of voltage are not in place and not in good condition (not suitable for use, complete and intact).	**III**
	The required grounding and short-circuit devices available on sites, in use or to be used, are not suitable (with not markings conforming to the standard, complete, intact, etc. report in the "Notes" which).	**III**
	When the Personal Voltage Detector (PVD) is required, it is not present on site and its correct functionality has not been verified.	**III**
	Workers do not correctly use the Personal Voltage Detector (PVD) provided for the activity.	**III**
	The underground and overhead electrical cables are not sheltered and the safety distances are not respected according to the voltage of the network.	**III**
Fall from Height	PPE and CPE for Work at Height protection are neither worn nor used correctly.	**III**
	PPE and CPE for Work at Height are not available on site, efficient and suitable (not complete, intact, marked/certified in accordance with standards/reference standards, etc.).	**II**
	The protections and guards against falling from height are neither efficient nor correctly used (complete, intact, marked/certified according to standards/reference standards, etc.).	**III**
	The equipment for access in elevation (stairs, brackets, crampons, scaffolding) available on the site are not suitable (not complete, intact, marked, certified).	**I**
	The equipment for access in elevation (stairs, brackets, crampons, scaffolding) are not correctly installed and used.	**III**
	The scaffolding is not correctly constructed and/or used (on a visual examination, check the stability guaranteed by the bases at the lower extremities, the plane, the verticality).	**III**
	Scaffolding are not assembled, dismantled or converted by trained and qualified personnel.	**III**
	The ladders are not positioned and fixed correctly on stable surfaces (both vertical and horizontal), and they are not correctly used in accordance with the planned activities.	**III**
	Analysis of the structure strength and anchoring system (in case of lighting pole, roof top, wall, etc.) which support ladders or allow stepping on has not been performed according to internal procedures.	**III**
	Before climbing a pole/pylon, stability and integrity have not been assessed and related documentation is not available.	**III**
	The bracing system has not been correctly installed where required.	**III**

CATEGORY	BREACH	SEVERITY
	Scaffolding is not available on site and it is not suitable for the activity (not complete, intact, and certified).	III
	Ladders are not available on site and are not suitable for the activity (not complete, intact, and certified).	III
	Lifting platforms are not available on site and they are not suitable and used correctly.	III
Falling Objects	The equipment/materials used for the activities at height are not insured against falling (e.g. by using suitable work belts, lanyards, special containers, etc.).	II
	A delimitation of the area at risk of falling objects has not been carried out and in compliance with the prohibition to pass vehicles/persons under the falling trajectory is not guaranteed.	II
	Suspended loads are not controlled by guide ropes, are not properly secured/slung; the lifting devices are not in good conditions; any containers used are not fit for purpose.	III
	Tools or equipment are stored near the edges, on railings or high surfaces. The resulting materials are neither cleaned nor removed regularly.	II
	During the handling of loads, there is not the presence of at least one coordinator in charge of guiding the manoeuvres, the appropriate procedures are not adopted to guarantee the safety of the operations.	III
Interference Management	Interferences are not well managed (reference to interferences with activities, power lines, machines, vehicles, etc.).	III
	The participation at coordination meetings has not been performed and documented, if requested.	I
	In case of Complex Activities, the coordination and supervision duties are not managed as for the approved Procedure and not formally documented in files available on-site (e.g. Coordination Report).	II
Entrapment	The machines and devices used for the execution of the activity are not equipped with suitable protections and emergency stops and they are not in accessible position during the activities.	III
	All controls are not labelled clearly with their function.	I
	Workers near machinery with moving parts do not wear appropriate clothing and accessories (are not avoided necklaces, bracelets, rings, long hair are not collected and clothing are not adherent to the body, etc.).	III
Excavation	The activities are not correctly carried out to avoid the risk of collapse of structures/land (e.g. stowage of excavations foreseen according to the depths), etc.	III
Impact with Object	The handling of loads is not in accordance with the lifting plan. The following were not assessed: suitability of the soil, weight of the materials, integrity of the ropes/lifting devices.	III
	The manual/motorized carts are not correctly sized for the load to be transported, not equipped with systems for locking the load, and everything that extends beyond the sides of the trolley is indicated.	II
	Shelves, storage areas, cabinets, etc. are not easily accessible, with indication of the maximum capacity. Loads are not correctly stacked and/or fixed to prevent them from slipping or falling.	I
	The temporary pressure pipes are not laid along protected paths and the necessary joint protections are not installed.	II
Road Works	If necessary Traffic is not directed by trained flaggers.	II

CATEGORY	BREACH	SEVERITY
Chemical Risk	The safety data sheets for chemicals are not updated, present in the workplace and made available to workers.	**I**
	The handling, storage and use of the substances is not made in accordance with the provisions of the safety data sheets and the risk assessment.	**II**
	Deposits of combustible materials and the chemicals used are not stored in separate areas, away from ignition sources, and the tanks are not fixed to prevent overturning and damage.	**II**
	If during the execution of the work there is the risk of the formation of dangerous concentrations of chemical substances, the concentration is not controlled, (e.g. using continuous detection systems).	**III**
	The chemical substances found in the work area were not all authorized at the time of entry in compliance with the regulations in force.	**II**
Fire Risk	In the case of activities that may cause fire (e.g. welding, cutting, use of the cutter) the Hot Work Permit is not available on site and respected.	**I**
	The machinery and equipment containing or that have contained combustible materials were not subjected to gas free before the hot works were carried out.	**II**
	The area is not clear of all combustible materials.	**II**
	Fireproof Curtains are not in use during welding activities.	**II**
	The welding fumes are not aspirated through a suitable extraction system to ensure adequate ventilation.	**II**
Confined Spaces	The correct communication between workers, the lighting system and the monitoring of the atmosphere is not carried out in accordance with what is described in the Work and Emergency Plan.	**III**
	First aid and recovery equipment for confined spaces are not present, suitable and efficient. Prescribed breathing apparatus are not available, they are not in good condition and they do not respect required standards/regulations.	**III**
	The Work and Emergency Plan has not been posted at the entrance of the confined space subject of the activity.	**I**
	In environments with risk of contamination from one or more substances, specific gas detectors are not available.	**III**
	There is not a forced ventilation system in case of places with inadequate air exchange.	**III**
Explosion Risk	If during the execution of the work there is the risk of the formation of explosive atmospheres or an increase in the level of risk, the concentration is not continuously controlled by explosimeters.	**II**
	The electronic equipment (mobile phones, two-way radios, etc.) introduced in the work areas are not suitable for the type of classification of the area.	**II**
	Equipment/tools are not suitable for the type of classification of the area at risk of forming explosive atmospheres.	**II**
Remote & Alone Work	If employees are isolated from other persons, there is not a means of communication which enables the employee to call for help in an emergency and has not been trained for its management.	**II**

CATEGORY	BREACH	SEVERITY
Cut	Employees exposed to the hazards created by cutting operations are not protected with personal protective equipment and clothing.	**II**
Noise Risk	Where practicable, control measures have not been put in place to reduce the risk of hearing loss where noise levels > 85dB(A).	**II**
	Hearing protection has not been provided to workers.	**I**
Place of Work / Workstation	The Principia Energy does not provide infrastructure resources necessary to perform activities in compliance with ergonomic risk assessment.	**I**
	Table, keyboard, mouse, monitor and other devices have not the appropriate desk layout taking into account also the lighting sources.	**I**
	Workers have not the correct sitting posture in front of PCs and do not use working tools safely.	**I**
	Workers do not pay attention walking along the corridors and do not use handrails whilst descending the stairs.	**I**
	In case of prolonged work at video screens, workers do not take short breaks at regular intervals.	**I**
	Desks, chairs, lockers do not remain always stable and secure.	**I**
	Restrooms and other dedicated areas are not available for worker's rest.	**I**
	Area has not suitable lighting sources for the tasks to carry out.	**I**
	The panels and walls are not in good condition free of moisture and/or damage.	**I**
	Healthy working environment and well-designed workspaces are not ensured.	**I**
	All electrical systems and sanitary installations are not in good condition.	**II**
	The warehouses and shelves are not in good condition and in order.	**I**
	Space around the desk does not allows a comfortable sitting position.	**I**
	HVAC system is not properly working.	**II**
	Firefighting system has not been periodically tested and records are not available.	**III**
	The Emergency Plan/System is not updated, and not periodically tested and does not identifies safe and risk areas (ex. risks related to the location inside and outside the buildings).	**II**
	Emergency maps are not updated and posted on the walls.	**I**
	Safe areas cannot be easily found in case of emergency.	**I**
	The emergency lighting system does not work correctly and the emergency routes are not kept clean and free of obstacles.	**I**

FURTHER BREACHES OF H&S OBLIGATIONS

CATEGORY	BREACH	SEVERITY
General Provisions	Consumption or possession or distribution of alcohol or drugs in the Work Site.	**III**
	Failure to comply with smoking ban.	**I**
	Lack of adequate means of emergency intervention or paramedic personnel (when required).	**III**

CATEGORY	BREACH	SEVERITY
	Inadequate distribution of potable water / foods.	**II**
	Failure to respect regulations relevant to traffic Code, speed limit and safe driving. In case that behaviour causes a hazardous situation, the severity could be increased to **III.**	**I** **(III)**
	Failure to comply with requirement on Health and Safety from Law and/or Contract and/or these HSE Terms and/or HSE Requirement not mentioned in the other points of this list.	**I**
Works above water/with hydraulic risk	Works performed not in compliance with Law and/or Contract and/or these HSE Terms and/or HSE Requirements concerning risks related to works above water.	**I**
	Works performed not in compliance with Law and/or Contract and/or these HSE Terms and/or HSE Requirements concerning hydraulic risk.	**III**
Underwater works	Works performed not in compliance with Law and/or Contract and/or these HSE Terms and/or HSE Requirements relevant to underwater works.	**III**
Works with exposure to physical agents	Emission of physical agents (e.g. noise, vibration, dust) not notified to Principia Energy, or above authorizedthreshold limits, or that could cause damage to Principia Energy or third parties.	**II**

Key

I Severe Breach

II Very Severe Breach

III Extremely Severe breach which will cause a significant downgrading in the SPM Index

17.3 CLASSIFICATION OF ENVIRONMENTAL BREACHES

- Without prejudice to its right to terminate the Contract, in relation to each violation regarding the environmental protection, and without prejudice to its right to claim further damages, Principia Energy also has the right - at its sole discretion - to apply, by notifying the Contractor by official communication with proof of receipt, the sanctions listed and quantified in "APPENDIX 3 Sanctions for HSE violations" relevant the specific Country.
- In case the Contractor (or one of its Subcontractors) is responsible of an Environmental Event, Principia Energy reserves the right to apply - depending on the relevance of the impact - a sanction of up to 2% of the total (or maximum) contract value and in any case not less than the amount specified in "APPENDIX 3 Sanctions for HSE violations".[8]

LIST OF ENVIRONMENTAL SEVERE, VERY SEVERE AND EXTREMELY SEVERE BREACHES

CATEGORY	BREACH	SEVERITY
General provisions	Forgery of documents required by Law relating to environmental issues	**III**
	Recurrence (two or more episodes) of the same very severe environmental violations (listed in this list, as severity II)	**III**
	Starting activities without all the necessary authorizations regarding environmental aspects	**III**

CATEGORY	BREACH	SEVERITY
	Activities carried out in violation of Principia Energy's internal Environmental Systems rules or contractualenvironmental clauses.	II
	Failure to execute environmental liability insurance to cover environmental responsibilities (if required by Contract)	II
	Recurrence (two or more episodes) of the same severe environmental violations (listed in this list, as severity I)	II
	Employment of Personnel without professional profiles/qualification/training requested to understands and executes all requirements and regulations relating to environmental protection, that are applicable to perform the Contract.	II
	Failure to submit environmental reports according to the defined deadline	I
	Failure to participate in coordination meetings (if required according to environmental legislation or required by contract)	I
Event reporting	Failure to immediately make adequate mitigation measures in case of environmental event/ damage.	III
	Failure to immediately (and no later than 48h) communicate to Principia Energy any evidence related to checks and inspections carried out by Government Authorities and, in case of infringement, the actions carried out or planned in agreement with the authorities aimed at restoring legal compliance.	III
	Failure to communicate immediately to Principia Energy (and/or to the authorities when it is required) on any environmental event that occurs during the execution of the Contract and that implies the obligation of reporting to the authorities.	III
	Failure to communicate immediately to Principia Energy on any environmental event that occurs during theexecution of the Contract and that not implies the obligation of reporting to the authorities.	II
	Failure to submit a written report of the environmental event including its causes and the measures taken for the management and resolution of the event within a maximum of 24 hours.	II
	Failure to submit a written notice of any Environmental Near Miss, within 3 calendar days.	I
Compliance – Air Emission	Execution of the activities without: a) authorization for air emission or b)implementation of preventive or operative measures necessary to comply with limits stated by the authorization or the applicable regulation.	III
Compliance – Water protection	Execution of the activities without: a) authorization for waste water discharge or b)implementation of the preventive or operative measures necessary to comply with limits stated by the authorization or the applicable regulation.	III
	Use / suction of unauthorized water	III
	Reiterated or systematic use / suction of water above the allowed limit capacity	II
Compliance – Soil protection	Lack of preventive measures aimed to prevent soil contamination (eg. Mixer truck washing, containment tanks for diesel tanks)	I

CATEGORY	BREACH	SEVERITY
	Protection measures are not correctly adopted to mitigate any spill of oil or other pollutants.	**I**
	The excavated materials are not properly stored and managed in compliance with the authorization or applicable regulation.	**II**
Compliance – Waste	Waste management without authorization or not in compliance with the authorization or applicable regulation.	**III**
Compliance – Others	Execution of the activities without: a) authorization or b)implementation of the preventive or operative measures necessary to comply with applicable Law regarding environmental matrices: air emission (e.g. dust from vehicles), water discharge (e.g. domestic waste water and storm water discharge), waste management, soil usage, non-Hazardous Substances management, noise and vibration emission, vegetation management, biodiversity, protected areas, archaeological sites, Personnel specific qualification, etc.)	**II**

Key

I Severe Breach

II Very Severe Breach

III Extremely Severe Breach which will cause a significant downgrading in the SPM Index

17.4 CONTRACT TERMINATION FOR REASONS ATTRIBUTABLE TO HEALTH, SAFETY AND ENVIRONMENTAL REQUIREMENTS

- Principia Energy - at its sole discretion - may terminate the Contract in case:

a) Fatal/Life Changing Accident during the performance of the Contract, in which Contractor is, as determined by the accident investigation analysis carried out by the Principia Energy Group Principia Energy, primarily responsible for the Fatal/Life Changing Accident; or

b) Fatal/Life Changing Accident during performance of another contract with Principia Energy or another Principia Energy Group Principia Energy by the Contractor or a Contractor Group Principia Energy, in which Contractor or the relevant Contractor Group Principia Energy (i) is, as determined by the accident investigation analysis carried out by the Principia Energy Group Principia Energy, primarily responsible for the Fatal/Life Changing Accident and (ii)has a negative outcome in Principia Energy's assessment on HSE organization of Contractor and/or Contractor Group Principia Energy; or

c) contractor does not implement actions defined in the remediation plan (proposed by Contractor after a HSE default and validate by Principia Energy) within the specified time limit, or

d) the amount of the safety sanctions applied due to violation reach the amount of 5% (five per cent) of the Contract's value or the equivalent amount of 20 severe sanctions[9], or

e) the amount of the applied environmental sanctions reach the amount of 5% (five per cent) of the Contract's value or the equivalent amount of 20 severe sanctions[10], or

f) violations by the Contractor and/or any Subcontractor of the requirements of Law or of the Contract on the protection of the environment, implying at least one of the following consequences:

- High widespread impact; long term or irreversible environmental-biodiversity damage
- Non-compliance with legal or permit requirements that could result in:
  - severe finesimpact on licenses,
  - civil/criminal lawsuits with restriction of Principia Energy personnel freedom,
  - civil/criminal lawsuits with liability involvement of Principia Energy personnel,
  - Environmental Asset Shutdown,
- Reputational issues:
  - Severe concerns among national and international stakeholders, expressed in a written communication send to Principia Energy,

- Severe media opposition at national and/or international level,

- Financial loss (all costs incurred as a result of the environmental event, i.e. fines and penalties, liabilities, immediate corrective actions, remediation plan implementation, loss of revenues, etc.) greater than 1.000.000 €.

- In the event that Principia Energy make use of this contractual right, the Contract shall be immediately terminated after Principia Energy's written notice, without any compensation and without any other prior formality nor court intervention, arbitration process or any other procedure being necessary, without prejudice of Principia Energy's right to claim damages.

principia

Operational Standard no 608

Version no1 dated 24/04/2024

APPENDIX 1 FOCUS ON COMPLEX WORKS ACTIVITIES

1. DOCUMENT AIMS AND APPLICATION AREA

1.1 This Appendix specifies the main working roles involved and the documentation required to perform the planning, organization and coordination of the work activities in case of complex work activities on Work Sites. The working roles and documentation outlined in this Appendix are mandatory for the activities execution and they shall be formally identified.

1.2 This Appendix gives the minimal requirements to be adopted and represent the best practice for the execution of complex work activities/construction activities. It shall be applied in compliance with any applicable Laws and country/local regulations which in any case prevail over the provisions contained in this document.

1.3 Contractor shall comply with all the rules specified in this Appendix, for the management of interference risk. To this end, Contractor shall:

(i) for Complex Works whose HSE coordination is under Contractor's control:
   1. appoint and include in its HSE Organization the HSE coordinators with roles and responsibilities as defined in this Appendix, and
   2. ensure that planning phase and executing phase are carried out according to the principles here defined, or

(ii) for Complex Works whose HSE coordination is under Principia Energy or third-party control:
   1. cooperate with appointed HSE coordinators and
   2. comply with requirements from Safety Work Planning of activities

The Contract specifies which of the option above shall be adopted by the Contractor.

2. DEFINITIONS AND ACRONYMS

In the present Appendix the following definitions apply:

"Foreman supervisor": Person who, while having all the features of a Foreman, plays a role of general coordination of the activities by controlling the compliance of the general planning established as well as the anticipated development of the activities to be performed in the whole work.

"Handover of a work area": Action by which a work area is made available for its access and works, by informing the recipient about its conditions, safety conditions included.

"Handover back of a work area": Action by which a work area previously handed over is made available at the conclusion of certain works.

"HS Coordinator for design and planning": one person who, in the design and planning phase, is responsible for establishing the Safety Working Planning of the activities (SWP) in order to minimize the possible interference risks.

"HS Coordinator for execution and control": one person who, starting from the SWP, is responsible for the coordination between the different working groups during the execution phase, in order to minimize the interference risks.

3. PROCESS DESCRIPTION

3.1. Profiles involved in the process and relevant skills

3.3.1. *Profiles involved in the process*

The following profiles are normally identified:

1) During the WP phase:

- the profile of "HS Coordinator for design and planning" who, by consulting the parties involved in the work to be carried out, cooperates with the work planner in the definition of the activities planning and update/establishes the preventive H&S coordination planning of this work in order to reduce the interference hazard.

2) During the WE phase:

- where it is required by the work complexity, a profile of "HSE Coordinator for execution and control" who performs, with regard to the safety purposes, an action of coordination between the different subjects taking part to the work execution, with the aim of controlling the compliance of the prevention and protection measures against the interference hazards which have been previously established. This profile can play its role periodically or punctually.
  This profile is similar to the profile of "HS Coordinator for design and planning", it could be covered by the same physical person, and can work to modify the Works planning, when it is required by the activities development.
- the profiles of "E Coordinator" which are responsible for carrying out environmental coordination activities provided for in the Contract and/or the applicable legislation. If not required in the Contract, the E coordinator can be represented by the same

representative for the HS coordinator profile, if he/she is qualified for the role.

- If needed, the profile of "Foreman supervisor" who controls the compliance of the general execution planning which has been established preliminarily to the work as well as the anticipated development of the activities to be performed in the whole work, by playing a role of general coordination of the activities;
- one or, if needed, more profiles of "Foreman" who are responsible for the management of the single work activities in which the planning is subdivided, from the handover of the work area until its handover back. Besides the correct execution of the assigned activities, these profiles are responsible for the control of the compliance of the connected safety issues. This profile shall be aware of the planning contents and, if necessary, contribute to its preventive definition; therefore this profile also relates with the possible "Foreman supervisor" as concerns the general coordination of works/construction site, and with the "HS Coordinator for execution and control" as concerns the compliance of the safety measures and the interferences management. A Foreman can take the role of Foreman supervisor when the work activity under its control does not avoid him to cover this role of Foreman supervisor.

3.3.2. *Skills of the profiles involved in the process*

3.3.2.1 The profile of "HS Coordinator for design and planning" and "HS Coordinator for execution and control" (she/he will cover the roles of coordination and control) shall have the following features:

- experience in the execution of complex work activities and in the related arrangement;
- ability of risk analysis as concerns the activities performed and assessment of the possible interferences;
- knowledge of the prevention and protection measures against the hazards and of the measures for the interferences mitigation;
- knowledge of the safety regulations and standards;
- ability of coordination and mediation between different needs and profiles;
- assumption of responsibility and leadership in dealing with also special situations.

3.3.2.2 The profile of "Foreman supervisor", besides the skills of the profile of "Foreman", shall also have the following:

- experience in the execution of complex work activities and in the related arrangement;
- ability of coordination and mediation between different needs and profiles;
- assumption of responsibility and leadership in dealing with also special situations.

APPENDIX 2 SANCTIONS FOR HSE VIOLATIONS

The following table reports for each severity level of the violation, the minimal economic amount of the specific sanction.

		Health & Safety breaches			Environmental breaches		
Country	**Courr.**	**Severe (I)**	**Very Severe (II)**	**Extremely Severe (III)**	**Severe (I)**	**Very Severe (II)**	**Extremely Severe (III)**
Greece	Euro	300	500	1.000	300	500	1.000

ANNEX A- MINIMUM REQUIREMENTS FOR TEMPORARY ELECTRICAL INSTALLATIONS OF WORKSITE (ATTACHED)

ANNEX B - MINIMUM REQUIREMENTS FOR EXCAVATED SOIL AND ROCKS MANAGEMENT AT WORKSITES (ATTACHED)

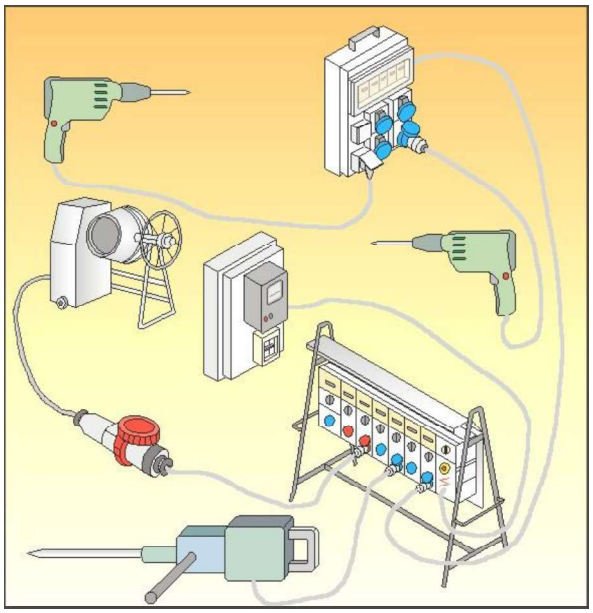
ANNEX C - MINIMUM REQUIREMENTS FOR MANAGING AREAS OF WASTE/MATERIAL REMAINING AT WORKSITES (ATTACHED)

ANNEX D - MINIMUM REQUIREMENTS FOR WASHING OF VEHICLES AT WORKSITES (ATTACHED)

ANNEX E - MINIMUM REQUIREMENTS FOR REFUELLING OF VEHICLES AND MACHINERY AT WORKSITES (ATTACHED)

ANNEX F - MINIMUM REQUIREMENTS FOR WORKS AT NIGHT IN WORKSITES (ATTACHED)

ANNEX A- MINIMUM REQUIREMENTS FOR TEMPORARY ELECTRICAL INSTALLATIONS OF WORKSITE



1. GENERAL INFORMATION

1.1 Premise

The worksite is considered one of the most danger place for electrical hazards because it is under continuous changes, but also for the presence of different employees which are often not trained from the electrical risk point of view.

For the realization of an electric plant it is fundamental to take in account the presence of employees and work vehicles with a risk of a collision or contact with live parts, variable weather conditions (in particular rain, but also strong wind and high / low temperature) presence of dust and water, areas with potential risk of fire or explosion increase by presence of electrical installations.

A site electrical installation, even if considered as provisional since it is designed to be removed in short time, can have a duration of months or years depending on the characteristics of the project. Therefore, it is fundamental that it is planned and made in a proper manner using materials and industrial electrical components and it is maintained efficiently over the time duration by trained personnel in order to ensure the proper functioning of the equipment and employees integrity.

The laying of the main cables, panel and junction boxes, electrical panels, jacks and plugs, the lighting system, the grounding connections and all maintenance activity must be performed by qualified personnel.

1.2 Scope of document

Define the minimum requirements for the electrical elements of the electrical system at worksite in order to ensure the safety standard for the personnel which operate or is located on site.

1.3 Responsibilities and obligations

The responsibility for correct implementation and efficient system operating status of electric plant on the site, shall be assigned to the Engineering, procurement, and construction manager (CONTRACTOR).

2. PLANT INSTALLATIONS

2.1 Electrical panels

- The electrical panel have to be waterproof for preventing raining water infiltration. The electrical panel have to be made with insulated material. If structure made in metallic material, that have to be properly grounded.
- Input and output wires have to be installed from the bottom side in order to prevent the entry of rain water into the electrical panel.
- Main and secondary electrical panels have to be equipped with magneto thermic switch. The set point has to be defined in advance and based on the electrical load.
- At least the main electrical panel has to be equipped with differential relay set at 30 mA. If the main electrical panel has lower sensitivity protection (not more than 300 mA) it is necessary to arrange the secondary electrical panel with the differential relay aet at 30 mA for all utilities or plugs till 32 A;
- In order to allow the maintenance activities, the electrical system has to equipped with a disconnection point before the main feeder
- The electrical panel has to be properly secured in order to avoid not authorized access. It has to be equipped with external emergency bottom (red colour) to use in case of emergency disconnection.
- On the electrical panel a dedicate safety sign has to be showed indicating the electrical risk and live part presence a number or letter for its identification.
- Inside the electrical panel a list (numbers or letters) of sub-panel connected has to be reported. The list must be in line with the electrical scheme and should be updated in case of modification in order to have proper and dedicated disconnection point.

Good examples: Fig: 1-2

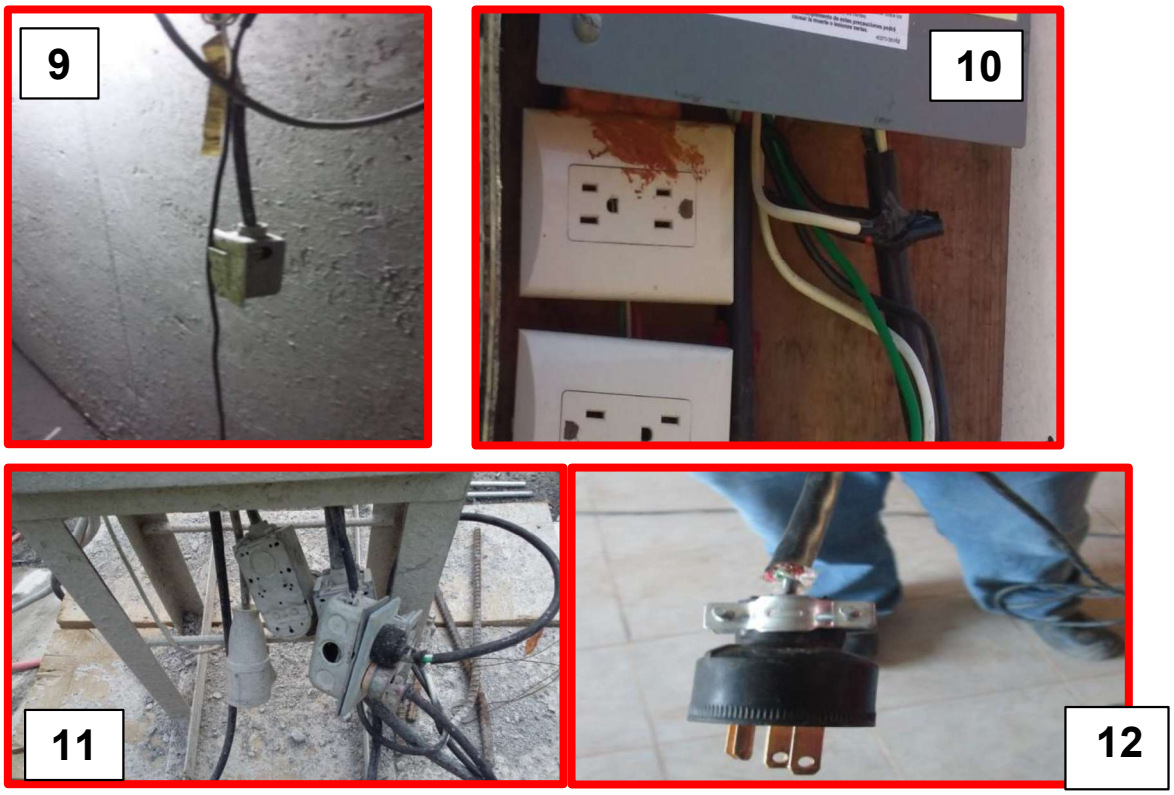
Bad example: Fig: 3-4-5

2.2 Plugs – Socket – Adapters (converter)

- The Insulation has to be damages free
- Clean and free of visible damage on the external casing
- Grounded
- The cable has to fully enter in the casing and it has to be blocked with the cable press that should be part of the plug / socket;
- Each plug has to be connected to one socket. Avoid improper connections with multiple plugs as derivation from the main cable;
- Derivations are allowed only with suitable adapters, with casing free of damage including that one due to overload, electric arc or short-circuit;
- The number of plugs suitable for the adapter must take in account the load electricity. it is forbidden connect plugs that can create overload due to adapter limit
- If used in outdoor environment the plugs have to be watertight and protect from the rain water or dust. Avoid to place the plugs directly on the ground.

Good examples: Fig: 6-7-8

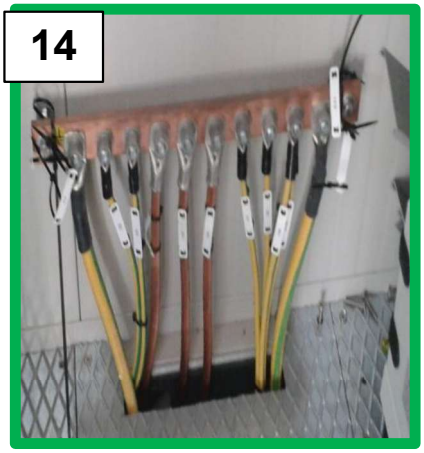
Bad example Fig: 9-10-11-12



2.3 Grounding system for metallic casing

- The metallic casing of the electrical panel or junction box have to be properly grounded (section of the grounding cable should as follow: 16 mm2 for cable till 25 mm2, 25 mm2 for cable till 50 mm2 or 50 mm2 for cable with more than 50 mm2)
- Cable terminals and lugs have to be properly tightened and grounded in order to avoid increasing of earth resistance. Ground connections with cables wound on the contact point are forbidden.
- The contact surfaces must be clean and free of paint or rust that increases the value of ground earth resistance;
- If in place use the pre-installed earth point located on the casing by using a ground cable with headed lugs
- If the earthling system is in place utilize as ground rod. If not possible the ground rod has to located at least 50 cm deep.
- For construction containers positioned closer, ensure the grounding connection and in equipotential condition.

Good examples: Fig 13-14



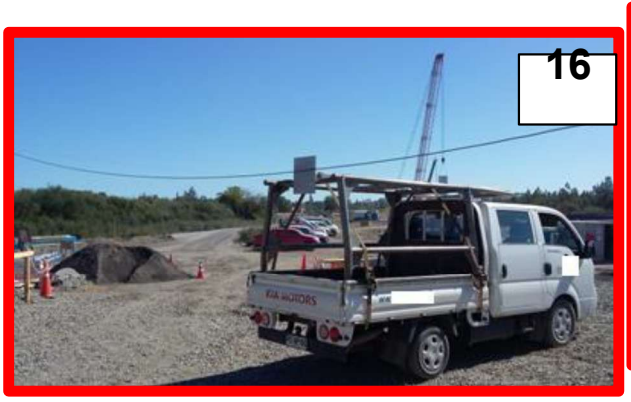
Bad example: Fig: 15

2.4 **Cables for electric lines at worksite**

- Double insulation and proper cable section
- For trunk lines, where is possible, identify paths around the construction area in order to minimize the interferences and crossings line;
- Underground and located in protected tunnels by using tubes or corrugated which allow their potential recovery without reopen the excavation;
- Overhead cables located to the correct height in order to minimize interference with the work activities and work vehicles
- In proximity of crossing aerial line, the cables have to be marked with signs or colored tape;
- The cable support of aerial line have to be realized for failure preventing considering the total load (weight, throw, wind shear, etc.);
- Avoid to submit the cable to excessive mechanical stress. Contain as far as possible the distance between the supporting points and adopt fastening systems which do not damage the cable;
- Case and Junction box should be waterproof in order to prevent raining water infiltration. The panel has to be made with insulated material. Metallic panel has to be properly grounded.

- In case of junction box or iron frame, input / output cables must be protected with corrugated or PVC tube. The same principle is valid also for the contact points of the cable with the metallic frame;

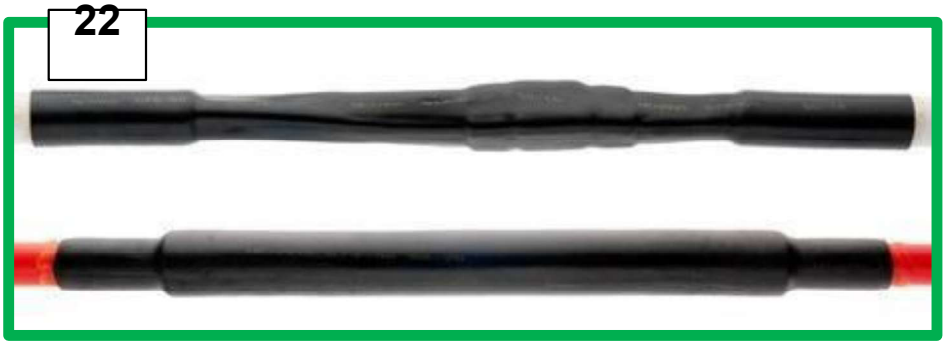
Bad example: Fig:16-17-18-19-20



2.5 **Extension cables**

- Double insulation, free from damage and deterioration point due to friction, accidental contact or crushing;
- Adequate cable section in relation to the applied electrical load
- The junction point if any, should be clearly visible. Therefore, at the junction point should be adopted a different colour tape
- Usually joints should be avoided. In case a junction is needed, the same must be done with self-amalgamating tape or heat shrink kit. Homemade junctions arranged with materials that do not guarantee the water resistant of the cable are forbidden

Good examples: Fig: 20-21-22



Bad example: Fig: 23-24

2.6 Fixed mobile and portable lighting system

- Fixed mobile and portable lighting system, especially if placed outdoors, should be suitable to external conditions (rain, humidity). They have to be positioned in order to avoid interfere with the normal site activities and protected against accidental bump. They have to be arranged in an appropriate way in order to ensure a good level of illumination of the perimeter areas, access routes and transit;
- For transportable equipment, before each use, and in particular as a result of each movements, check the light and cable integrity;
- Portable devices must have the handle made by insulating material, the electrical parts fully protected and mechanical protection for the light bulb. Before each use, perform a visually inspection of device and wires for verify the integrity
- Portable equipment must be made with sturdy material considering that are exposed to continuous movements
- Lamp holder made of porcelain or insulating material: unprotected metal parts are prohibited
- As a general rule the number of lighting system and their placement must consider the environmental conditions (working during night shift or indoor) and they have to ensure adequate lighting of transit and work places, avoiding the glare effects (especially if you use headlights) or shading area because represent a possible causes of accident.

Good examples: Fig: 25-26-27-28

25

26

27

28

ANNEX B - MINIMUM REQUIREMENTS FOR EXCAVATED SOIL AND ROCKS MANAGEMENT AT WORKSITES

SECTION 1 - GENERAL INFORMATION

Purpose of the document

The purpose of this document is to define a register format for recording soil and rock excavation activities undertaken within the Principia Energy worksites.

This document supplements the general provisions of the *HSE Terms Requirements*.

In particular, the procedure applies to all contractors/subcontractors carrying out activities at Principia Energy worksites.

The responsibility for the proper management of excavated soil and rocks is entrusted to the Contractor and to each contractor according to the activities undertaken.
All contractors must use the format attached to this technical note for the recording of soil and rock movements.

Reference documents

This Technical Note is an integral attachment of the:
HSE Requirements

SECTION 2 - MANAGEMENT RULES

Classification and scope of this document

Any activity, from small construction/demolition tasks to large works, requires excavation and thus the production of soil and rocks.
Site work will generally require infrastructural and excavation activities, by way of example some cases are summarized below:

a) generic excavation work (levelling, foundations, trenches, etc.)
b) civil engineering works (perforations, drilling, piling, consolidation, etc.).
c) infrastructure work in general (tunnel, dam, road, etc.)
d) removal and levelling works
e) stony materials with different particle size fractions from excavations.

Where local regulations do not a priori exclude that excavated soil and rocks may be considered as waste materials, therefore tending to classify them within the waste listings, it has become necessary to examine the specific local regulations themselves in order to identify the criteria which would allow excavation materials to be classified as non-waste so they may be handled without endangering workers' health and without harming the environment.

If local regulations require the drafting of a soil management plan during the project design stages, then excavated material must be handled in compliance with the provisions outlined in that same document.

Management and Reporting

Management of materials excavated within the worksite

i. The excavated material may be accumulated close by excavation site at a distance not less than 10 m from the excavation face (compatibly with the space available).

ii. The piles of material must also be established well away from watersheds and natural drainage lines and not in the vicinity of steep slopes susceptible to landslides;

iii. Both deposits will be identified by appropriate signs posted in a visible manner.

iv. The storage must be done carefully so as to avoid erosion of the piles that could cause the dispersal of the materials into the surrounding areas and/or contamination of surface water. In particular, if it is expected that the storage period will extend beyond 2 months, the possibility of seeding the pile surfaces with a protective covering of native herbaceous plants should be considered.

v. Any volumes of soil with no reusable purpose must be stored and managed as waste according to the regulations.

vi. If local regulations require the separation and recycling of *top soil*, the latter should be separated from the rest of the excavated material to avoid contamination and treated as required by the same regulations.

vii. Any stony material suitable for roadwork, protecting river beds and possibly strengthening embankments must be stored separately from other soil components.

To ensure material loading, unloading and storage operations in conditions of total worker safety, all appropriate vehicular traffic regulation devices must be installed.

Reporting

Special site registers (fig. 2) containing information related to the production location, the material quantities handled and the destination location must be kept available to the Principia Energy staff on site.
The volumes of soil involved shall be estimated in m3, for example, based on the load capacity of the vehicles used

The daily monitoring of soil and rocks quantities (in m3) must enable a daily reporting of:

A. Total excavated quantities
B. Quantity of stored material
C. Quantity of material re-used internally in the worksite or externally (eg: embankments, landfills, landscaping, etc.)
D. Disposed quantities.

Such reporting must allow for proper monitoring of the overall quantitative balance of excavated material such that A = (B+C+D).

principia	HSQ	ANNEX B to HSQ_OS_608_v1
		24/04/2024

Fig.2

REGISTER: EXCAVATED SOIL AND ROCKS ARISING FROM AND HANDLED DURING WORKSITE ACTIVITY

Excavation locations	Excavated volume (m^3)	Temporary storage locations	Stored volume (m^3)	Recycling location	Recycled volume (m^3)	Final disposal location	Unused volume (m^3)
Total volume	0	**Accumulated**		**Recycled**	0	**Unloaded**	0

Definitions	
Excavation locations	*Identification of the area in which the material was excavated, (eg. excavation at wind turbine site nr, roadworks, excavations for transmission lines, etc.)*
Volumes	*Enter the total amount of soil and rocks generated from the excavation in cubic meters (also by means of estimates based on truck load capacities)*
Location of the temporary accumulation site	*Identify the location where the excavated material is to be temporarily stored*
Recycled volumes	*Indicate the volume of material used for the creation of other works (for example landfills, roadworks etc.)*
Recycling location	*Indicate the location where the excavated material is recycled (for example: at the wind turbine nr., "x" roadworks, "y" transmission line foundations, etc.)*
Unused volumes	*Indicate the volume of excavated materials which are not used for the creation of other works related to the project, expressed in cubic metres (also by means of estimates based on truck load capacities)*
Final disposal location	*Indicate the location for the final disposal of unrecycled excavated material*

ANNEX C - MINIMUM REQUIREMENTS FOR MANAGING AREAS OF WASTE/MATERIAL REMAINING AT WORKSITES

SECTION 1 - GENERAL INFORMATION

Scope of this document

The purpose of this document is to regulate the procedures for managing waste and material remains of working within Principia Energy worksites, in order to:

- Encourage the recovery of waste;
- Encourage use material remains of working
- Continually monitoring of waste quantities and waste stored at worksites;
- Continually monitoring of remaining material quantities stored at worksites;
- Define procedures for managing waste storage areas;
- Define procedures for managing storage areas of remaining material;

This document is intended to supplement the general provisions in the *HSE Requirements*.

In particular, the procedure applies to all contractors / subcontractors carrying out activities at Principia Energy worksites.

Referral documents

This Technical Note is an integral attachment of the:
E&C HSE Requirements.

The Emergency Plans must be adapted to the requirements of this document.

SECTION 2 - PROCEDURES FOR MANAGING STORAGE AREAS

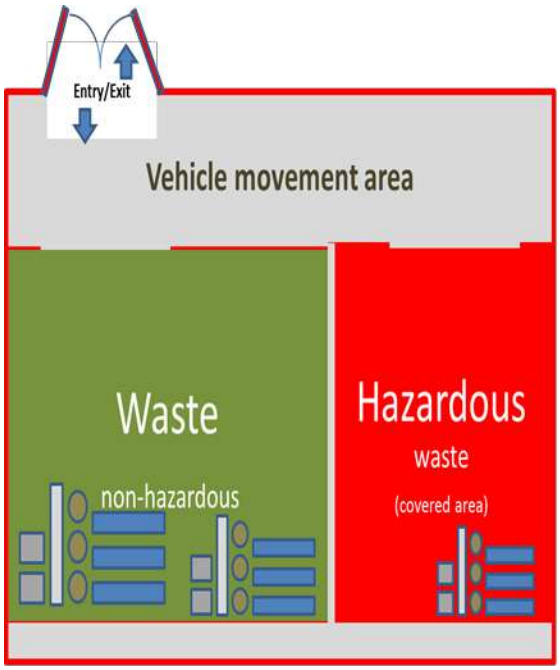
WASTE - Identification of storage areas

The area intended for the temporary storage of waste shall be indicated in the relevant plan in detail (e.g. Fig. 1). This area must be situated inside the worksite, fenced in and appropriately localized, in order to enable easy and safe access by equipment and machinery assigned to the loading and unloading of waste and their collection.
The temporary waste storage area should be divided into two sub-areas intended for the separated storage of non-hazardous and hazardous waste. The two sub-areas must be appropriately sized for the production of the waste provided during the different phases of the work at the worksite, in order to proper and orderly management, avoiding excessive pile-ups. If necessary, according to the evolution and displacement of the different activities inside worksite, shall be provided areas properly demarcated for daily storage of waste.
At the end of the day, the waste must be transferred to the main specific storage area. It is essential that suitable SAFETY SIGNS be installed next to the main storage area of hazardous and no-hazard waste, identifying the type of stored waste, the main risks involved, and the prohibitions and requirements to be observed. At least two portable fire extinguishers, must be installed next to the areas, one for each.

The two sub-areas must be exclusively intended for the storage of:

1. **Non-hazardous waste**
2. **Hazardous waste**

Fig.1 – Waste storage



WASTE - Management of areas

The following is a list of general precautions to be observed for **hazardous waste** in storage areas:

- The surface of the storage area must be of adequate size to capably store the volumes of waste previously estimated in the design phase of the works.
- The area must be fenced in, with a waterproof pavement.
- The waste must be separated by type (wood, iron, plastic, etc.) or in accordance with local regulations if these are more restrictive (e.g. Europe perimeter CER codes).
- The containers used to contain hazardous waste must possess suitable strength requirements in relation to the chemical and physical properties, as well as the hazardous specifications of the waste contained within them.
- Process waste materials that can combine to react dangerously, giving rise to explosive, flammable and toxic substances, must be stored so that they cannot come into contact with each other.
- Liquid waste should be collected in bins which should be put on top of the "containment tanks" made of a suitable material and of adequate capacity, in order to hold accidental spillage of waste.
- Outdoor storage areas must be equipped with suitable roofing to prevent the direct radiation of the containers (with consequent dangers of overheating and the formation of gaseous products), as well as leaching and rainwater accumulation in the containment vessels; at any rate, the condition of the containment vessels should be ascertained periodically and after heavy rainfall.
- Hazardous waste must be disposed of as scheduled every month or if greater than 10 cubic meters or in accordance with local regulations if these are more restrictive.

Through spot checks at the landfill, it is important to make sure that the operator in charge for disposal executes waste correctly management as stated in the permits.

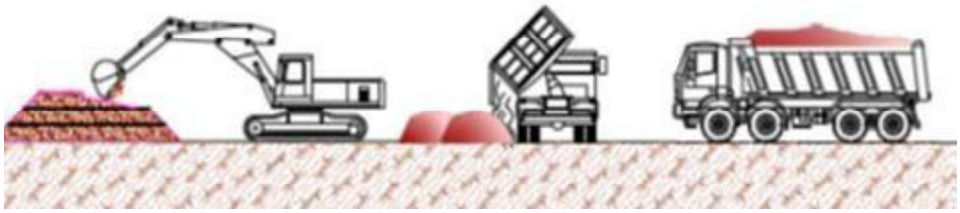
The following is a list of general precautions to be observed for **non-hazardous waste** in storage areas:

- The surface of the storage area must be of adequate size to capably store the volumes of waste previously estimated in the design phase of the works.
- The area must be fenced in.
- The waste must be separated by type (wood, iron, plastic, etc.) in accordance with local regulations or in accordance with local regulations if these are more restrictive (e.g. Europe perimeter CER codes).
- Packages must be separated from other types of waste. They must be separated by type (paper, wood, plastic, metal) and properly stored in order to promote reuse and recovery even outside the worksite.
- Waste stored in heaps ("avoiding bulk storage") must be protected from rainwater and wind.
- No-hazardous waste must be disposed of every month or if greater than 20 cubic meters or in accordance with local regulations if these are more restrictive.

Focus on **Inert Material** identified as waste

If the work methods adopted within the site have a decisive effect on the quantity and composition of inert waste materials production (e.g. rubble, debris, demolition waste) these materials should be stored in a different area from those used for waste collection. In according with local regulations could be allowed their re-use.
Inert waste must be stored in low mounds and slopes in order to avoid risk of landslides.

Fig.3 - Storage of inert waste



MATERIAL REMAINS OF WORKING - Identification of storage area

The area intended for storage of material remaining shall be indicated in the relevant plan in detail (e.g. Fig. 2). This area must be situated inside the worksite, fenced in and appropriately localized, in order to enable easy and safe access by equipment and machinery assigned to the loading and unloading of material and their collection.
The storage area should be separated from waste storage area. In order to proper and orderly management, avoiding excessive pile-ups, the area must be appropriately sized for the production of remaining material during the different phases of the work on site. If necessary, according to the evolution and displacement of the different activities inside worksite, shall be provided areas properly demarcated for daily storage of material remaining. At the end of the day, the amount of material must be transferred to the main storage area. It is essential that suitable SAFETY SIGNS be installed next to the main storage area, identifying the type of stored materials, the main risks involved, and the prohibitions and requirements to be observed. At least one portable fire extinguisher must be installed next to the area.

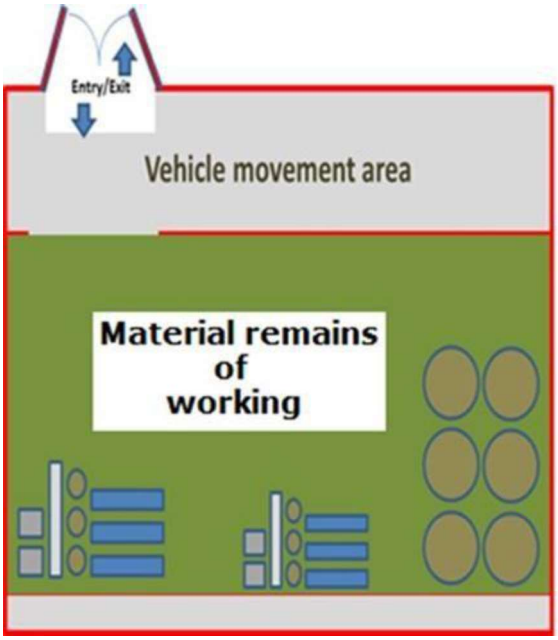
The area must be exclusively intended for the storage of remaining material by work activities.

Waste materials generated at the worksite are predominantly structural components and accessories (wood, metals, cables, insulation materials, etc.), which can potentially be treated as resources.

As regards these areas, the general precautions to be adopted for **process waste** are listed below:

- The area must be fenced in.
- Waste must be stored separately by type (wood, metals, cables, insulation, etc.) into well sorted piles, avoiding any accumulation in "bulk" mode.
- Piles of waste materials that are sensitive to weather conditions must be protected by suitable covering systems.

Fig.2 – Storage of remaining material by work activities



MATERIAL REMAINS OF WORKING – AREA Management

General precautions to be implemented in this area, are listed below:

- The surface of the area must be suitably sized as to be able to keep the volumes of materials.
- The area must be equipped with a fence.
- The material must be stored in piles by type (wood, steel, cables, etc.) avoiding mode in bulk.
- The material must be protected from rainwater.

ANNEX D - MINIMUM REQUIREMENTS FOR WASHING OF VEHICLES AT WORKSITES

SECTION 1 - GENERAL INFORMATION

Scope of this document

The purpose of this document is to regulate the procedures for the washing of vehicles in Principia Energy worksites in order to:

- Define processes for the environmental management of waste washing water via appropriate treatment systems;
- Ensure regular road traffic by removing any worksite residues and thereby enhance road traffic safety;

This document is intended to supplement the general provisions in the *HSE Terms and Requirements* .

In particular, the procedure applies to all contractors / subcontractors carrying out activities at Principia Energy worksites.
Responsibility for properly managing the washing of vehicles is entrusted to the Contractor of civil works and to each contractor or user owning the work vehicles in question.

Referral documents

This Technical Note is an integral attachment of the:
E&C HSE Requirements.

SECTION 2 - PROCEDURES for washing vehicles

Identification of vehicle washing areas

At each worksite where muddy soil is present, an internal washing system must be provided for the wheels of vehicles using special nozzles (example Fig.1), for washing the external and internal surfaces single or twin wheels, or systems with iron rollers (example Fig.2), in order to remove worksite residues. The washing water will be conveyed into a settling tank waste water and subsequently be sent to the treatment plant to be reused.
In addition, to proceed with the washing of cement truck mixers within the worksite, including both the vehicle's internal and external parts, a dedicated area must be adequately prepared with a washing water storage system. The inert material (sludge) deposited on the bottom of storage system could be collected and re-used at worksite in according with local laws. After a suitable solids separation, settling and oil removal into special tanks, the water could be completely reused for industrial use inside worksite. In both cases, periodically the tanks should be emptied. These artifacts must be removed at the conclusion of work on site. These artefacts must be removed at the conclusion of work on site.

Management of waste washing water

Wheel washing water
Washing water from the wheels of work vehicles must be considered an effluent liquid, consisting of water, suspended mud, with the possible presence of oils and greases. If the local regulations does not consider differently, washing water is not considered waste but rather drain water.
However, if this type of waste water has good quality characteristics it could be reused at the worksite and if the washing water remains within the worksite's production cycle, it will be considered as process water.

Washing water of cement mixer truck

Washing water from cement trucks must be considered an effluent liquid, consisting of water, suspended mud and cement, with the possible presence of oils and greases. If the local regulations does not consider differently, washing water is not considered waste but rather drain water.
However, if this type of waste water has good quality characteristics it could be reused at the worksite and if the Washing water remains within the worksite's production cycle, it will be considered as process water.
In particular, the sludge produced by internal washing of cement mixer's drum it is considered as waste (Unless different local regulations on waste legislation) and cannot be reused as a by-product at the worksite, so it should be taken to the landfill.

Fig.1

Fig.2

ANNEX E - MINIMUM REQUIREMENTS FOR REFUELLING OF VEHICLES AND MACHINERY AT WORKSITES

SECTION 1 - GENERAL INFORMATION

Scope of this document

The purpose of this document is to regulate the procedures for the refuelling of vehicles in Principia Energy worksites in order to:

- Define environmental management procedures for the remediation of contaminated soil using appropriate treatment systems;
- Prevent possible Diesel/Gasoline, lubricating oils and greases leaks due to refuelling;
- Define the safety rules to be observed during the refuelling operations.

This document is intended to supplement the general provisions in the *HSE Terms and Requirements*.

In particular, the procedure applies to all contractors / subcontractors carrying out activities at Principia Energy worksites.
Responsibility for properly managing the refuelling of vehicles is entrusted to each contractor or user owning the work vehicles in question

Referral documents

This Technical Note is an integral attachment of the:
HSE Terms and Requirements.

The Emergency Plans must be adapted to the requirements of this document.

SECTION 2 - PROCEDURES for the refuelling of vehicles

Identification of vehicle refuelling areas

Each site must provide stationary dedicated areas within it for the refuelling of worksite vehicles, including suitable equipment for in-line refuelling using shuttle service.

Worksite refuelling area

In particular, a container firmly anchored to the ground can be set up at dedicated vehicle refuelling areas, with a geometric capacity not exceeding 5,000 litres, and suitable for containing hydrocarbons. The distributor container must also be equipped with a containment basin of a capacity not less than half of the geometric capacity of the container; a protective hood providing protection from the elements should be made of non-combustible material and suitably grounded.
Areas at which the container/distributors are set up should be flat and raised at least 15 cm above the level of the surrounding terrain. The area around the container must be completely clear and devoid of vegetation, which can constitute a fire hazard. The container/distributors must be installed solely in clear open areas. The container/distributors must be located in a designated area, preferably if bounded by a masonry wall or metal mesh fence, and fitted with a sliding door to the outside, lockable with a key lock or padlock.
At least three portable fire extinguishers (right size) must be installed in the vicinity of the container/distributor. If local low Act is more restrictive it prevails on what indicated in this document.

In-line refuelling

In-line refuelling refers to the diesel refuelling of work vehicles that cannot access the worksite refuelling area, and are therefore reached by a suitably equipped shuttle service. Emergency kits must be provided on board the shuttle equipment, containing absorbent cloths and other suitable materials for containing, collecting, stopping and at least partially absorbing any spillage during in-line refuelling operations.
It must include a portable containment device.
Moreover, to avoid spills during in-line maintenance operations on worksite vehicles and equipment, containment tanks or other suitable systems must be adopted, set up at the maintenance points. In

addition, the lubricating oil containers must be placed onto watertight containment tanks.

Management of ground spills

Classification of spills

The negative effects of accidental spills on the environment depend on the type of hazardous substances, the amount spilled and the type of receiving soil substrate.
The contractor must have procedures to respond to each type of spill, according to the activity performed.

General preventive measures

The general measures to be adopted in order to minimize spills of fuel, oils and lubricants can be summarized as follows:

- use of suitable containers for transporting and storing each type of liquid;
- proper maintenance status of all containers;
- the loading, unloading and transfer of potentially polluting substances must always be carried in sealed areas with tarpaulins or containment vessels;
- the fill level of containers should always be visible, in order to avoid overflows and any spillage of liquids;
- proper maintenance status of all pipes and pipelines and related connections for the transport of liquids;
- regular inspections and maintenance interventions on all equipment.

All fixed machinery (UPS units, compressors, etc.) and equipment should be set up in sealed areas with plastic sheeting.

Procedures for the recovery of accidental spillages

The following actions must be undertaken in the event of accidental spills (medium-high) of hydrocarbons, oils and lubricants on the ground:

- immediately inform the Site Manager;
- immediately interrupt refuelling / maintenance operations;
- capture and containment of the spill;
- removal of the contaminated material and transportation to landfills or in temporary storage at the worksite.
- applied a chemical to restore the soil (biosolvent)

The temporary storage used for storing the contaminated soil must be on a horizontal ground surface and rendered appropriately waterproof with tarpaulins. The mound of contaminated soil must also be suitably covered with tarpaulins.

ANNEX F - MINIMUM REQUIREMENTS FOR WORKS AT NIGHT IN WORKSITES

SECTION 1 - GENERAL INFORMATION

Scope of this document

The purpose of this document is to regulate the procedures for the works at night in Principia Energy worksites in order to define the technical and organizational aspects to consider on worksites when works at night are required.

This document is intended to supplement the general provisions in the *HSE Terms and*

Requirements. This procedure is applicable in all Principia Energy worksites.
In particular, the procedure applies to all contractors / subcontractors carrying out activities at Principia Energy.

Referral documents

This Technical Note is an integral attachment of the:
Technical specification HSE Requirements.

The Emergency Plans and evacuation must be adapted to the requirements of this document.

SECTION 2 - OPERATIONAL PROCEDURES

General

On all Principia Energy worksites all activities shall be performed in conditions of the greatest visibility both the day than at the night. However, when urgent work is required all activities may have to be carried out after normal working hours. In particular can be carried out all activities at night in case of:

- ✓ For technical reasons cannot be interrupted;
- ✓ If there are delay by works program;
- ✓ Critical weather conditions;
- ✓ If these are requested by the Client (EGP);
- ✓ If it is scheduled in Gantt of Contractors;

Works continuing into the late afternoon.

There are cases in which, for operational and/or safety reasons, work in progress cannot be interrupted and must therefore continue into the late afternoon for the time required to complete the operation. In addition, it may be necessary, due to particular climatic conditions (in countries with very hot) anticipate dawn the first shift of work, when the conditions of visibility are poor. In order for the team charged with the work to complete it, a necessary condition is that all workers involved shall be granted an adequate rest break before continuing. During the time of activities, the Safety Officers/Agents presence on the site must be properly planned and guaranteed especially when the risks due to the activities are rated as "high". The Safety Officers of EGP and Contractors must work together to ensure the respect of the Safety Standards. If it is necessary to change a work team in order to complete previous activity, a formal hand over must be carry out between teams.

Work performed at night.

When urgent work is required, all activities can be performed after normal working hours starting from the late afternoon into the night in compliance with the instructions given in this document. If work at night are requested by the Client or those are scheduled in Gantt, the Contractors must be planned appropriate shifts into "night work" permit to work. A necessary condition for this is that the team charged with performing the work shall not work the preceding and following day shifts to ensure that they are properly alert and able to concentrate on their work. During the night works must always be guaranteed the Safety Officers/Agents presence on site. The Safety Officers of EGP and Contractors together must work to ensure the respect of the Safety Standards. If it is necessary to change a work team in order to complete previous activity, a formal hand over must be carry out between teams.

Traffic management at night.

To avoid interference with other vehicles on the site, the movement of heavy vehicles may be scheduled in the "night work" procedure. This activity should be planned in advance with a study of the vehicles' itineraries and the performance of the preliminary activities described below.

In all of the aforementioned cases, works shall not be performed if there is rain, snow or fog.

Risk Management

Whenever it is necessary to work at night, the risks involved in such work shall be evaluated and added to the risk assessment performed previously.

Below is a list of risks that work at night may entail; they should be modified/customized on the basis of the conditions on the individual sites and activity.

If the work area and the manoeuvre in progress is poorly lit the following risks may be present:

- *Crushing, caused by the falling of materials during hoisting and mounting of components;*
- *Striking/tripping, due to the presence of poorly illuminated materials or equipment in the work area;*
- *Cuts/abrasions, in performing operations without proper lighting;*
- *Being run down, by vehicles moving on the worksite;*
- *Falls from the same level or different level/slips.*

Tiredness may also be the cause of accidents or injuries: Breaks from work shall be provided for whenever the worker feels the need.

Operational Instructions

Prior to performing works in conditions of poor visibility or at night, it is best to prepare the measures that allow the performance of tasks in conditions of safety beforehand. Such measures refer to the preparatory phase of the work and are to be carried out when conditions of visibility are still good, or in any case before work begins.

Before work begins:

The entire phase of preparation of the work area shall take place in the afternoon when daylight is still sufficient. The preparatory phase includes:

- *Checking the availability of fuel for generating sets;*
- *Checking road conditions, especially after adverse weather conditions, in the case of transportation;*
- *Controlling dust by sprinkling water on roads;*
- *Checking that machinery is working properly;*
- *Placing lights or reflectors along the routes that vehicles must travel up to their destinations;*
- *Placing intermittent lights to alert drivers about obstacles (for example: trenching, slope, corner low visibility, work in progress, etc.) along the way;*
- *Providing a plan for evacuation from assembly areas and placing proper lighting along the escape routes shown on the plan;*
- *Implement adequate training to workers on emergency procedures and evacuation from the worksite.*
- *Placing all materials, machines, equipment, lights on the work area.*

Further measures to be implemented should be evaluated in relation to the characteristics of the individual worksites.

During work:

To ensure that works are performed in safe conditions it is necessary to provide:

- *Lighting by means of lamps providing at least 50 lux at ground level (or higher if the local law requirements are more restrictive);*
- *A floodlight that can swivel to follow the hoisting of components;*
- *Prevent glare caused by very different levels of illumination;*
- *Avoid the grey areas in places used for working activities;*
- *A lamp on the crane jib;*
- *Emergency lightings for illuminating the following areas:*
  - Escape routes leading to safe places or outdoors
  - The areas at risk of falling;
  - The first-aid areas and areas where there are fire control equipment
  - The area where are installed the main switchboards;
- *Several communications systems connecting ground personnel and workers above ground;*
- *Suitably lit sheds or areas adjacent to the work area for storing equipment required for assembly;*
- *Parking areas for service vehicles outside those used for assembly work;*
- *Special attention must be paid in positioning floodlight cables so that they do not hinder transit routes;*
- *All workers shall be provided with personal protective equipment, with the addition of lamps on helmets;*
- All on-site workers must wear fluorescent and reflective clothing, orange or yellow with white/silver bands.

(In particular, on wind worksites, it is necessary to provide *a portable emergency light at all levels of the tower as well as on the nacelle).*

In the event of an emergency while work is in progress, activities are to be suspended until safe conditions have been restored.

Coordination meeting

In order to evaluate the efficacy of the measures adopted and to discuss any problems that may arise, it is also good practice, to arrange for a series of coordination meetings organized by the site Safety Officer, with the company responsible for the works.

Instructions concerning the timing of such meetings are as follows:

1- Coordination meetings with the contractor that is to perform the works on **the days preceding the start-up of night-time** activities to discuss the risk assessment and the safety measures to implement;

The operational procedures decided during such meetings shall be made known to all operators;

2- A coordination meeting following **the first period of work at night** to assess the need for changes in the intensity of lighting or to share knowledge of any problems encountered.

The Safety Officer by agreement with the Site Manager can freely decide how e when to schedule this coordination meeting.