

MAJOR ACCIDENT HAZARDS PREVENTION POLICY

(rif art.14 D. Lgs. 105/15)



Rev n° 09 – improvement plan modification

Prepared	Verified	Approved
Monica Giannetti (HSEQ) 	Monica Giannetti (HSEQ) 	Giovanni Giorgi MD 

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1 INTRODUCTION

This major accident hazards prevention policy was drawn up by OLT Offshore LNG Toscana S.p.A., the Operator of the Terminal (hereafter OLT), and it defines the general criteria on which the company bases its policy concerning major accident hazards associated to the Terminal “**FSRU Toscana**”. It also defines the targets to be pursued to ensure the proper of safety and environment management.

Such policy, together with the integrated Quality, Environment, Health, Safety and Social Accountability (HSEQ Policy), defines the primary values that company intends to pursue in its business and in its relations with the population.

With the present document, drawn up in accordance with the provisions of art. 14 and annex B of Legislative Decree 105/2015, OLT undertakes to adopt and maintain, also through the Shipowner (OLT's outsourcer), appointed in accordance with the Navigation Code, and to whom the technical management of the Terminal is entrusted, what is declared in the present policy, with the aim of managing and controlling all the activities that may have an impact on the safety of workers and community, and on the company's safeguard.

Considering the naval connotation of the Terminal, and given the presence of a Shipowner, this policy declares that the Management System, compliant with UNI 10617 and Legislative Decree 105/15, is the integrated system of the Shipowner (ECOS S.r.l). OLT also declares that, with appropriate transparency and dedication, it is committed to maintaining continuous and constant control over the activities of the Management System applied by the Shipowner, with the main objective of preventing major accidents and safeguarding people and the environment.

This policy, in accordance with current legislation, is implemented and maintained by the company organisation and reviewed periodically, at least every two years.

2 GENERAL PRINCIPLES

OLT undertakes to:

- communicate this policy (safety policy for the prevention of major accidents) and the HSEQ policy to all persons working in or on behalf of the organisation (including the Terminal Owner), ensuring that it is understood, implemented and supported;
- communicate this policy (safety policy for the prevention of major accidents) and the HSEQ policy to the community through the company website;
- scrupulously comply with legal requirements to protect Safety and the Environment in the surrounding area, including land and maritime regulations;
- promote the continuous commitment of the entire corporate structure, according to its attributions and competencies, to the achievement of the objectives of corporate policies, including the Safety policy;
- informing and consulting the company's RLS (workers' safety representative) on aspects falling within his competence, in accordance with current and applicable legislation.

3 GENERAL AND SPECIFIC OBJECTIVES

The main objectives shared with ECOS S.r.l. are the following:

- the continuous maintenance of the Management Systems in compliance with the applicable regulations and the objectives imposed by pursuing compliance with UNI EN ISO 9001, UNI EN ISO 14001, ISO 45001 standards and by disseminating within and outside the company a philosophy of Quality, respect for the Environment, Health and Safety, in particular by promoting dialogue with stakeholders to ensure transparency and clarity in relations;

- the continuous maintenance of a Terminal Management System in compliance with the rules of the SGS PIR system according to the applicable regulations (UNI 10617; Legislative Decree 105/15);
- the updating of risk analyses and the assessment of any new risks, in order to eliminate them and, where this is not possible, reduce them; this activity is carried out with particular regard to dangerous substances subject to major accident hazards and to the Safety Report, which will be kept constantly updated;
- the constant commitment to ensure that the entire organization according to its own tasks and skills participates in the achievement of Security objectives;
- the prevention of hazardous situations or accidents, eliminating whenever possible any hazardous situation, ensuring that the risk arising from the facility operations is the minimum reasonably achievable with current knowledge and technologies;
- minimising the impacts of a major accident through the timely and correct application of the envisaged protective measures;
- improving the reliability of plants and processes through the use of cutting-edge machinery and technology and by adopting targeted, preventive maintenance of plants defined as critical;
- protecting the environment and the surrounding sea from any form of pollution, while constantly maintaining environmental responsibility;
- enhancing and enriching the personnel's expertise and knowledge through education, training and awareness-raising at all levels, especially with regard to Safety issues;
- improving corporate organisation management through a precise definition of authority/responsibility levels, and better staff participation;
- constantly monitoring both internal and outsourced company processes, promoting at all levels an adequate awareness of Health, Safety, Environment and Social Responsibility aspects, including their continuous improvement;
- improvement and maintenance of preventive, planned and corrective maintenance, including the replacement of parts of plant or equipment.

The specific objectives, which are the basis of the actions periodically indicated in the annual improvement programme, constitute the foundation of the Major Accident Prevention improvement programme. These objectives, shared by the Operator OLT and the Shipowner ECOS, are defined annually under its Management System.



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4 MAJOR ACCIDENT HAZARDS PREVENTION MANAGEMENT SYSTEM (PIR)

4.1 Integration of PIR Management System with HSE Systems

Long time ago the Operator OLT decided to adopt a Company Integrated Management System in order to constantly improve the company processes and in particular: the Quality of the services, the management of environmental aspects aimed at minimising impacts on the surrounding Environment, the management of all aspects related to the safeguard of Health and Safety and, nevertheless, Social and Ethic Accountability.

In this perspective, OLT has adopted an Integrated Management System based on the requirements of the voluntary standards and regulations: **UNI EN ISO 9001**, **UNI EN ISO 14001**, **ISO 45001**, **SA 8000** and the **EMAS regulation**, used as tools to implement its Policy for Quality, Environment, Safety and Social Accountability.

OLT has also required the operator of the Terminal, ECOS S.r.l. (OLT's main outsourcer), which plays the role of Shipowner, to adopt a **Safety Management System for the prevention of major accident hazards (SGS-PIR) integrated with the voluntary standards UNI EN ISO 9001, UNI EN ISO 14001, ISO 45001, ISO 29001, ISM Code**, the latter specifically prescribed by the Maritime Authority.

4.2 Management System structure

The Operator OLT and the Shipowner ECOS Management Systems are adequate for the management of the Terminal 'FSRU Toscana' both for its maritime and plant component, taking into account the major accident hazards present in the Safety Report and Notification.

I Sistemi di Gestione del Gestore OLT e dell'Armatore ECOS sono adeguati alla gestione del Terminale "FSRU Toscana" sia per la sua componente marittima che per la sua componente impiantistica tenuto conto dei rischi di incidente rilevante presenti nel Rapporto di Sicurezza e nella Notifica.

The Terminal Management System (applied by the outsourcer ECOS) covers all aspects of Environment and Safety through the following structure:

- 0_Management;
- 1_HSE General;
- 2_Operations;
- 3_Technical Management;
- 4_Crew & Personnel Management;
- 5_Reporting;
- 6_Emergencies;
- 7_SOPEP;
- 8_Garbage Management Plan.

The detailed and analytical description of the Integrated Terminal Management System can be found in the ECOS Shipowner's HSEQ Manual, to which we refer for details (ECOS-IMS-MAN-001- HSEQ Manual).

In addition to the Integrated Management Manual items, port security is managed by the Shipowner in accordance with a Security Plan prepared following an appropriate assessment. These documents are approved by the Maritime Authority, and they are non-disclosable (ISPS Code).

The Integrated Management System of the OLT Operator, which is also described in a detailed and analytical manner, can be found in the IMSM, to which reference is made for details (Integrated Management System Manual).

4.3 System organization

In the following, the direct responsibilities of the OLT Operator and those entrusted, on the other hand, to the Terminal Owner are described for a better definition of the activities according to UNI 10617:

- Major accident hazards prevention policy: by and under the responsibility of the OLT Operator; the Shipowner, as an independent company, adopts its own policies but respecting the same principles set out in the OLT policies;
- Organization and personnel: the OLT Operator and the Shipowner ECOS are both in charge of defining responsibilities, roles and personnel training to the extent of their own competences and personnel. The OLT Operator, through appropriate audits to its outsourcer, constantly verifies the compliance of these activities with the regulations in force;
- Hazard identification and Major hazard risk assessment: the assessment of major hazard risk is under the responsibility of the OLT Operator, who uses, in addition to the Shipowner, also other outsourcers to periodically assess such risks. This activity is made explicit in the OLT procedures and in particular in the Procedure “Hazard identification and Major Accident Hazard Risk Assessment – Management of change” and related instructions;
- Legal and other requirements derived from voluntary memberships: the identification of legal requirements, their management and implementation are the responsibility of both the OLT Operator and the Shipowner ECOS, to the extent of their competences. In particular, as far as OLT is concerned, please refer to the ‘Legal Requirements’ Procedure, and for ECOS to the procedures ECOS-IMS-PROC-013-1 Monitoring of Legal Requirements and ECOS-IMS-LIST-008 Mandatory documents list;
- Implementation and organization (Documentation – operational control including maintenance activities - emergency preparation and response): given the presence on the Terminal FSRU Toscana of the Shipowner ECOS, which is also the Terminal Operator, the same company is entrusted with all the activities of Terminal management, emergency management (with powers of spending in emergency situations), definition of roles and responsibilities and, consequently, definition of personnel training and communication with the people who gravitate around the plant. The OLT Operator, through appropriate audits, constantly verifies the compliance of these activities with current regulations and the principles/objectives previously defined. The Operator, moreover, under its direct responsibility, prepares appropriate communication tools with the community, also aimed at planning the external emergency;
- Implementation and organization (management of changes): modification proposals are carried out by both the OLT Operator and the Shipowner ECOS, but must be approved by the other party in each case. Design activities (including safety activities) are jointly performed by the Operator and the Shipowner, in case also using external companies, while Terminal modification activities carried out by external contractors are always under the responsibility of the Shipowner. The OLT Operator is always responsible to assess the extent of the severity risk and the compliance with D. Legislative Decree 105/15;
- Performance monitoring: definitions of objectives, targets and specific programmes are set out in the annual improvement programme; the Operator's and Shipowner's targets are defined annually under their Management Systems;
- Check and revision: the verification activities are carried out by both the Operator and the Shipowner, each one in relation to the activities within its competence. In addition, the OLT Operator periodically schedules specific audits to verify the activities carried out by its outsourcer. The OLT Operator, in the Management Review, takes into consideration not only the activities of the company but also the activities related to the Terminal, including the management activities of the Shipowner and other outsourcers, such as the management of support vessels (Tug, Guardian vessel, Crew boat). In this regard, see, in particular, the Procedure ‘Management of outsourcing processes and operational controls’ and the “Audit” Procedure.

5 MANAGEMENT SYSTEM IMPROVING PLAN

During the annual Management Review, the OLT Operator carefully evaluates and defines a corporate implementation plan aimed at continuous improvement in the areas of Safety, Environment, Quality and Social Accountability. In particular, not only the targets and performance indicators, but also the corporate objectives (improvement activities) are defined and approved.

The aforementioned improvement activities are included in the company Budget, which is updated annually for the specific items of spending, timing and nature of the activities.

This planning, by virtue of the improvement principles defined in this policy, is an integral part of this document.