Italgas
Investiamo nel futuro dal 1837

HSE Annex (rev.1)

HSE REQUIREMENTS
for
HIGH-RISK ACTIVITIES

Italgas
Investiamo nel futuro dal 1837

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FOREWORD

Italgas Group firmly believes in the principles guaranteeing maximum safety in the work environment, environmental commitment, respect for all values related to inclusiveness, and transparency and legality, and promotes awareness actions aimed at its supply chain, represented by Contractors/Suppliers and Subcontractors/Subcontractors.

This document, in addition to its illustrative/informative purpose, represents an annex to the General Conditions and, as such, is contractual in nature.

SECTION 1 - MANAGEMENT HSE

1.1 Prevention as a key element - the cornerstones

1.1.1 Spreading the culture of safety

a. Follow safety procedures and use PPE not out of obligation, but out of innate behavior;

b. awareness that safety depends greatly on behaviors;

c. focus on what one is doing (attention maintenance), while automatically anticipating what the consequences of the activities performed may be.

1.1.2 Presiding over the integrity of equipment and PPE

Regular maintenance and inspection of entrusted equipment and personal protective equipment (PPE) are crucial elements in ensuring a safe working environment and are among the duties of the worker, who has a duty to report malfunctions, deterioration, reaching the expiration date of certain PPE to the employer for prompt repair or replacement.

1.1.3 Good organization and orderliness of the site/area of Works or Services

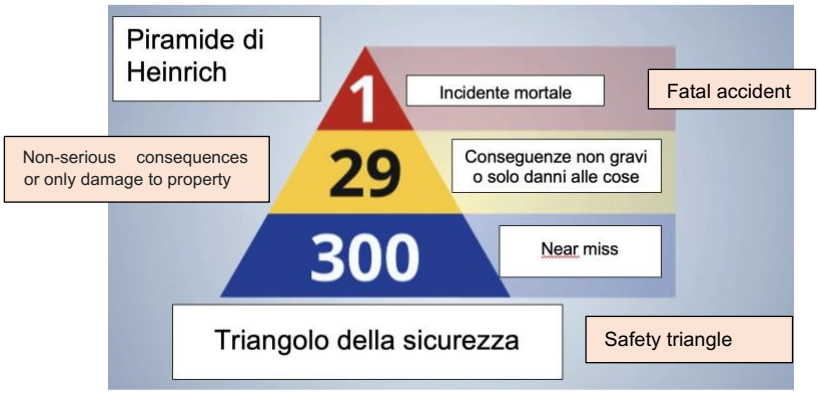
Maintaining well-organized and orderly spaces improves operational efficiency benefits while simultaneously raising the level of safety:
e.g., reducing the need for personnel and equipment to move around the construction site lowers the risk of accidents related to these activities.

1.1.4 Near miss, Heinrich's Pyramid/Bird and prevention

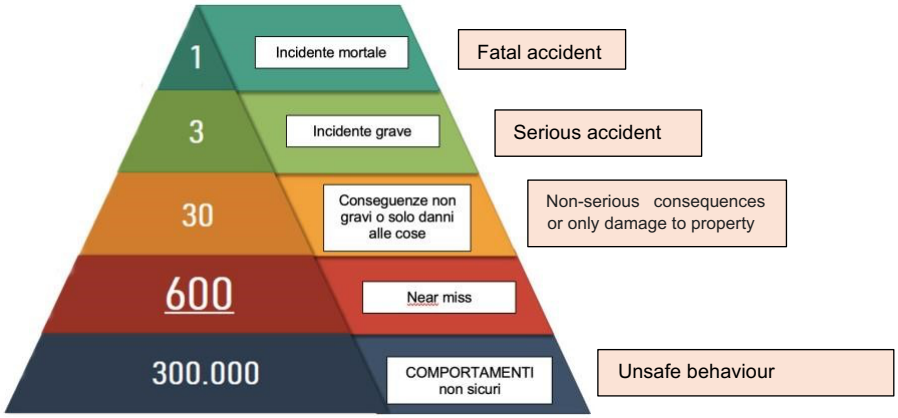
Embedding a culture of safety is foundational to the implementation of prevention principles related to the so-called Heinrich Pyramid or safety triangle.

Heinrich's Pyramid and later Bird's Pyramid represent a powerful injury prevention tool.

The Safety Triangle was published in 1931 by Herbert William Heinrich who catalogued more than 75,000 documented accidents. The proposed representation of the concept is a triangle, with a fatal event at the apex, 29 minor events at the center and 300 "near misses" at the base. "Near miss" is an event in which a potentially dangerous situation occurred but did not materialize into an accident.



Heinrich also argued that the majority of accidents can be attributed to man's decision to perform an "unsafe act" or his own misbehavior, and the theory was later developed in 1966 by Frank E. Bird on a sample approximately 23 times larger.
The study expanded the case history of accidental events, broadened the base constituted by near misses to 600 near misses, and added a first "step," referring specifically to prevention: if I recognize and avoid unsafe behavior, I directly decrease the frequency of near misses, with all the attendant benefits.



Heinrich's pyramid, **reviewed by Bird**

How Heinrich and Bird's Pyramids should be interpreted

Beyond the numerical values given, values that appear with some variability in the literature, the fundamental concepts that the conceptual approach must convey are as follows.

- Proactive prevention: Directly identifying and resolving the already root causes of near misses, even before these events occur, implicitly enables injury prevention.
- Training and Awareness: Educating workers on the importance of reporting, even before near misses, operational contexts amenable to refinement in terms of eliminating behavior, even if only potentially unsafe.
- Data analysis: Organizations should collect and analyze data on near misses and minor incidents to identify dangerous trends and conditions.

It is intended to act directly on near misses, even before they occur, by counting on a partnership with companies, which share with the client the common goal of making the work environment safer.

Given the above, Italgas Group intends to engage its contractors/suppliers and subcontractors/sub-suppliers to contribute to raising the safety level of construction sites by also developing a ***Culture of Reporting***, with specific reference to the first two points above.

From the collection and cataloging of reports and suggestions may arise optimization initiatives (on operations, process, equipment, ...) aimed at ensuring increasingly safe working conditions for all.
Reports may be sent to the Contract Manager to be brought to the attention of the Client's unit with HSE responsibility or may be forwarded via the channel indicated on the Company's website, www.italgas.it.

1.2 General HSE requirements

All activities under the Contract will be undertaken with compliance with the requirements set forth in this document, in addition to the requirements of current regulations.
It is the Contractor's responsibility to ensure that its Personnel and the personnel of its subcontractors have full knowledge of and comply with the provisions of this document, and with the provisions of current Occupational Health Safety and Environmental regulations, throughout the duration of the Contract activities,
It is also the Contractor's responsibility to ensure that its own Personnel and the personnel of its subcontractors have understood and comply with the Contractor's directions/procedures to be followed during activities at Company Locations/Facilities/Sites.
The Employer reserves the right to verify that the Contractor/Subcontractor complies with the HSE Requirements set out in this document. Verification may be carried out through Audits/inspections (including those not agreed upon in advance) by the Employer or by external personnel contracted by the Employer. More details can be found in Section 3 of this document. The Contractor will be responsible for conveying the information in this document to all of its own personnel (and personnel of its contractors) who are to work at construction sites/facilities or locations of the client. It will also be the responsibility of the client to verify that the contractor's/subcontractor's personnel have understood and comply with the contents of this document.

1.3 Work permit and prevention and protection measures

The Contractor/subcontractor shall define the operating procedures for carrying out all activities under its responsibility and shall obtain:

- a specific authorization provided by the Client for the performance of work activities classified as High Risk (as per Italgas procedures);
- a work permit from the client for activities that require it (e.g., activities in confined or pollution-suspected spaces, etc.).

Prior to carrying out the planned activity, the Contractor/subcontractor shall thoroughly explain to all operating personnel (including those of its subcontractors) the operating methods and safety procedures for the specific work activity to be carried out at the Client's worksite/business location/plant.
The contents of this training/information should be minuted by the Contractor, signed by all personnel present, and then forwarded to the Client.

1.4 Security and identification

The Contractor/subcontractor will provide the full names and necessary generalities of all personnel operating at the specific worksite/business location/plant, reporting it within appropriate forms or attachments accompanying the SOP/DUVRI depending on the type of activity. It is the responsibility of the contractor/subcontractor to promptly update the names of its personnel or its subcontractors, if any, on the above documentation by giving evidence to the Client.
Each member of the contractor's/subcontractor's personnel shall be equipped with identification badges provided by the contractor/subcontractor. The identification badge shall be worn in a conspicuous manner during the entire period in which the personnel will be operating at the contractor's worksite/facility or site.
The Contractor/subcontractor shall immediately notify the Contract Manager of any potential risk to safety, health, or physical safety of which he/she becomes aware during the performance of work, including intruders, suspicious packages, danger to the safety of persons, property/property, or risk of explosion or pollution.
It is prohibited to bring weapons into the venue at any time.
Contractor/subcontractor personnel shall be present only in the area affected by the activity.
The contractor/subcontractor is responsible for the safety and proper maintenance of all facilities, tools/equipment, and devices used in its activities, whether owned or rented.

1.5 Workforce

To carry out the activities, the contractor/subcontractor will provide adequate, competent, qualified, and, where required by applicable regulations, formally appointed personnel.
During the performance of work activities, the contractor's personnel and any of its subcontractors shall at all times maintain conduct in accordance with the Contractor's Code of Ethics.

The Contractor/Subcontractor will ensure that its personnel involved in High Risk Activities are physically fit to perform the entrusted activity in accordance with the requirements of the Client.
All Contractor's/subcontractor's personnel shall possess the necessary licenses and certifications required to perform Contract activities. The Contractor/subcontractor will maintain evidence of training and related certificates of its personnel.
The Contractor/subcontractor will ensure that it is available, during the performance of Contract activities:

- an adequate number of First Aiders for the limited treatment of minor injuries or illnesses that present an immediate danger to people;
- an adequate number of Fire Fighters to prevent and manage any emergencies that might occur during contracted activities.

1.6 Personal protective equipment (PPE)

The Contractor/subcontractor will ensure at its own expense that each member of its staff is provided with the appropriate PPE for the performance of Contract activities, as required by the specific documentation (POS/PSC /DUVRI or Contractor's/Subcontractor's DVR).
All PPE used should always comply with international standards and current regulations.
The Contractor/subcontractor will ensure that the adequacy of all PPE has been properly assessed and that it is properly maintained and that instructions for safe use have been provided in advance to all of its workers and workers of any subcontractors.
The Contractor/subcontractor will monitor the proper use of PPE by its own personnel and subcontracted personnel.

1.7 Zero tolerance for deviations

Italgas applies the zero tolerance for deviation policy in all high-risk activities, the principles of which are:

- Deviations from the Client's HSE requirements, particularly those involving High Risk activities, cannot be tolerated;
- In the event of deviations that could result in a serious accident, work activities will be stopped immediately and the contractor/subcontractor shall (with the support of the Client, if any) conduct a thorough analysis of the root causes and behaviours that caused the deviation and implement related prevention/protection measures before resuming work activities.

- Disciplinary measures may be applied where any a violation of one or more HSE requirements related to High Risk Activities is found, including through inspections or audits by the Client or its appointed personnel.

Measures will be defined and applied according to the following table:

Framework of Measures Applicable to Suppliers in the Event of Deviations Identified During On-Site Inspections Concerning High-Risk Activities

	CASE 1	CASE 2	CASE 3	CASE 4	CASE 5
Number of Deviations Identified During Inspections	1	2	3	4	5
Qualification Measures	**Nothing**	**3-months Warning**	**6-months Warning**	**6-months suspension of the qualification**	**12-months suspension of the qualification**
Number of Deviations Detected within the same construction site/contract	1	2	3	4	5
HSE Measures/Contract Manager	**Letter of objection**	**Letter of objection**	**Suspension of operational activities until the corrective actions agreed with the Client have been fulfilled (except for activities subject to ARERA/External Authorities' constraints)**	**Suspension of operational activities until the corrective actions agreed with the Client have been fulfilled (except for activities subject to ARERA/External Authorities' constraints)**	**Revocation of all ongoing Purchase Requests (RDCs) under the same contract and replacement by another company (except for activities subject to ARERA/External Authorities' constraints)**

Please note that, pursuant to the provisions of the current Supplier Regulation in force, should events occur that do not result in an accident/Near Miss but only in damages to third parties, the measures set out in the above-mentioned document shall apply.

Below are the 10 activities that Italgas considers to be "High Risk" and for which deviations will not be tolerated.

RISK MANAGEMENT	CONTRACTOR CONTROL	WORK AT HEIGHT	ELECTRICAL SAFETY	CONFINED SPACES
Assess and control risks before starting work	Contractors must apply Italgas safety regulations	Use safety belts when there is a risk of falling	The electrical installation on the construction site must be safe	Continuous monitoring of chemical agents
GESTIONE DEL RISCHIO	CONTROLLO APPALTATORI	LAVORI IN QUOTA	SICUREZZA ELETTRICA	SPAZI CONFINATI
Valutare e controllare i rischi prima di iniziare il lavoro	Gli appaltatori devono applicare le norme di sicurezza Italgas	Agganciarsi quando c'è il rischio di caduta	L'impianto elettrico di cantiere deve essere sicuro	Monitoraggio continuo degli agenti chimici

LAVORI IN GAS	MATERIALI PERICOLOSI	OPERAZONI DI SOLLEVAMENTO	LAVORI DI SCAVO	MOVIMENTAZIONE VEICOLI
I dipendenti devono applicare le norme di sicurezza Italgas	Corretta conservazione, uso e smaltimento delle sostanze pericolose	Mantenere una distanza di sicurezza dal carichi sospesi	Proteggere eventuali scavi o aperture del pavimento	Mantenere una distanza di sicurezza dai veicoli operativi
IN-GAS WORKS	HAZARDOUS MATERIALS	LIFTING OPERATIONS	EXCAVATION WORK	MOVING VEHICLES
Workers must apply Italgas safety regulations	Proper storage, use and disposal of hazardous substances	Maintain a safe distance from suspended loads	Protect any excavations or pavement openings	Maintain a safe distance from operating vehicles

One or more deviations on High Risk Activities will result in one or more measures shown in the table above.

In addition, when a serious deviation is detected, the Contracting Authority may suspend work until safety conditions have been restored.

The contractor/subcontractor will be responsible for applying these principles in the contracted work activity. It shall also ensure that its own personnel (and any personnel of its contractors) are familiar with and apply these principles throughout the duration of the contracted activities.

The Customer may at any time require the Contractor/subcontractor to remove from the contract area any plant, materials, vehicles, and equipment that do not comply with the HSE Requirements. In addition, the Client may require the removal of any Contractor/subcontractor worker who fails to comply with safety procedures or company HSE Requirements, causing possible health, safety or environmental hazards.

1.8 Audits and inspections

The Employer reserves the right to conduct (or to have conducted by outside firms engaged by the Employer) any audit and/or inspection deemed necessary during the term of the contract. These audits may be conducted at the location of the activities or, where appropriate, at the Contractor's and/or Subcontractor's locations.

Any deficiencies detected in the Contractor/subcontractor's handling of HSE issues shall be immediately corrected by the Contractor at its own expense. Client personnel may supervise all high-risk activities performed by the Contractor.
The designated supervisor may conduct documented inspections of the Activity performed by the Contractor/subcontractor verifying compliance with the client's HSE requirements.

1.9 Injury Management, Near Miss, Unsafe Actions/Conditions. The Contractor will immediately notify the Customer of any injury, environmental event, near miss (NM), unsafe condition or act occurring in the contract area and/or damage occurring within areas owned by the Customer (in the case

of activities at company sites/facilities), including events related to any subcontracted personnel.
In case of failure to report accidents or NM in a timely manner, the Client reserves the right to suspend for an appropriate time, work activities and qualification as a supplier for Italgas Group Companies.

In the event of an accident, environmental event or Near Miss (environmental or occupational safety related), the contractor/subcontractor shall submit to the Client within 48 hours of the event, a detailed report stating the main causes behind it, while securing the area shall be implemented immediately.
Thereafter, it will be the contractor's responsibility to define specific Corrective and Preventive Actions related to the event, which must be reported to the Client within 5 days, unless otherwise directed by the Client.
In the event that clear responsibility on the part of the contractor/subcontractor emerges as a result of the accident analysis carried out by the principal's staff, the principal reserves the right to apply the following measures:

	Outline of Measures against Suppliers in the Event of Accidents with Established Liability		
Number of injuries and days of prognosis	no. 1 injury with a prognosis < 3 months	no. 1 injury with a prognosis of between 3 and 39 days	no. 1 injury with a prognosis of 40 days or more or in case of a second injury
Qualification Measures	suspension of qualification for 3 months	suspension of qualification from 4 to 12 months	Revocation of qualification
HSE measures / Contract Manager	Suspension of operational activities until the corrective actions shared with the Customer are complied with (except for activities with ARERA/External Bodies constraints	Suspension of operational activities until the corrective actions shared with the Customer are complied with (except for activities with ARERA/External Bodies constraints)	Revocation of all pending application orders on the same contract and take-over by another company (except for activities with ARERA/External Bodies constraints)

1.10 Emergency response procedures but we want to give openness
The Contractor/subcontractor will ensure that all of its personnel are familiar with the Emergency Procedures specific to the worksite being worked on. In the case of activities carried out at the client's Locations or facilities, the contractor/subcontractor shall comply with the instructions contained in the emergency plans.

In any case, the Contractor remains fully responsible for the management of its own personnel (and the personnel of subcontractors) particularly during emergencies and/or evacuations at the subject site.

SECTION 2 - SAFETY PROVISIONS AND HIGH-RISK ACTIVITIES

2.1. MAINTENANCE OF ORDER AND CLEANLINESS OF WORK AREAS-HIGH-RISK ACTIVITIES

The Contractor will ensure that its work area is kept clean, orderly, and clear of debris generated by its activities.

The area targeted, especially in the case of construction sites, should be properly demarcated and marked by appropriate signage.

All work equipment, materials and vehicles of the contractor/subcontractor shall be properly maintained and arranged in an orderly manner at all times to avoid hazards.

For on-site activities, the contractor/subcontractor shall ensure that adequate emergency facilities (fire extinguishers, first aid kit, etc.) are in place at all times. These garrisons shall be regularly maintained, compliant with current regulations, and operational.
In the case of activities carried out at the client's premises or facilities, the contractor/subcontractor shall constantly ensure access to fire/emergency facilities, emergency exits and electrical panels, avoiding the storage of materials or vehicles near them.

2.2 CONFINED SPACES - HIGH-RISK ACTIVITIES

In the case of activities carried out in confined spaces, the client will inform the contractor about the characteristics of confined space workplaces and the emergency procedures to be followed.

In the case of activities carried out at client sites/facilities, confined spaces should be identified and marked with appropriate signs, and unauthorized personnel will be prohibited from entering these areas.

The contractor, prior to the start of the activity in confined or suspected polluted spaces, must prepare a procedure regarding the risks and operating methods referred to the specific activity, also stating how to intervene in case of emergency. The operating personnel present must have at least three years' experience in interventions in suspected polluted or confined spaces. In addition:

- a supervisor with at least three years' experience related to activities in suspected polluted or confined environments must be present at all times to supervise the activity and ensure implementation of this operating mode and safety and emergency measures;
- all personnel working on the site should have adequate training and information on the risk factors inherent in that activity;
- all personnel must be in possession of the personal protective equipment, instrumentation, and work equipment suitable for the prevention of the risks inherent in work activities in suspected polluted or confined environments (e.g., multi-gas detector); personnel working on the site must be trained in the proper use of third-category PPE, use of instrumentation, and work equipment;
- all personnel should be properly trained on the application of the operating procedure and all safety and emergency provisions;
- all personnel working on the site must have medical fitness for the specific task.

Activities in confined spaces shall be carried out as follows:

- 1 worker, depending on the type of activity to be performed, will operate within the confined space;
- 2 workers will be required to remain outside as supervisors and will provide first aid and contact with outside help if necessary.

The contractor who is to enter a confined space or a space suspected of pollution must be properly trained in accordance with Presidential Decree 177/2011 and possess specific requirements.
Personnel working in confined spaces who do not meet the requirements below must be removed from the site:

- At least three years' experience in working in suspected polluted or confined environments (not less than 30 percent of the workforce dedicated to confined space activity);
- For the contractor's personnel assigned to supervise the activity and ensure the implementation of safety and emergency measures, training as a Preposto with at least three years' experience related to activities in suspected polluted or confined environments is required;
- Training and information of all operating personnel regarding the risk factors of this activity with indications regarding the risks referred to the specific worksite;
- Possession of the PPE, instrumentation and work equipment suitable for the prevention of the risks inherent in work activities in suspected polluted or confined environments, with successful training in the proper use of such devices, instrumentation and work equipment;
- Training on safety and emergency provisions inherent to the specific worksite;
- Health surveillance of operations personnel, with attainment of fitness for the specific task.

These requirements will be verified at the qualification or bidding stage, or will be the subject of specific discussion with the individual firm at kick-off meetings and coordination meetings preparatory to the performance of activities. In addition, they may be verified by the client during site audits/inspections.

For all work carried out by the contractor/subcontractor in confined places, the drawing up of a "Work Permit" is mandatory.
In this document, evidence will be given of the verifications of the possession of the professional requirements and skills of the intervention workers.

At the time when activities in confined or suspected polluted environments will be entrusted to the Contractor and prior to accessing the confined space, the Client, through a meeting of not less than one day's duration, will inform all workers of the Contractor and Subcontractor, if any, about the existing risks, the characteristics of the workplaces and the prevention and emergency procedures to be adopted.

Specially trained Client personnel will supervise, the activities performed by workers employed by the contractor/subcontractor to limit the risk of interference of such work, with any work performed by Client personnel. As a reminder, in work activities carried out in pollution-suspected or confined environments, any (authorized) subcontracting contract must have requirements meeting the requirements of Title VII, Chapter I of Legislative Decree No. 276/2003.

2.2.1 Emergency Management in the Presence of Confined Spaces

The contractor's personnel operating shall be adequately trained, informed and instructed on how to handle emergencies; for prevention purposes, there shall be two contractor operators outside the confined space, trained to provide assistance, maintain visual and verbal contact with those entering and take all necessary preventive measures.
The operator who is to enter the confined space, throughout the duration of the work activity, must compulsorily remain hooked up to the intended retrieval system.
During the execution of activities within the confined spaces, if an emergency situation (accident, sickness of accessing personnel, etc.) arises, the following steps should be implemented:

- **Alarm Phase:** if the operator inside the confined space feels unwell, loses consciousness, suffers an injury, or is exposed to a dangerous condition as a result of an accident, the support staff present outside the confined space should immediately raise the alarm, contacting any other operators present and activating Public Rescue (112)
- **Recovery Phase**: this phase can be distinguished into:
  - Recovery from outside: The Person in charge and support personnel outside will recover personnel inside the confined space using the recovery system provided. In such a case, the outside personnel do not enter the confined space but proceed to recovery by remaining outside
  - Recovery from within: in case it is necessary to descend inside the confined space in order to carry out the recovery, personnel may only enter it after checking the composition of the atmosphere, wearing the additional PPE provided, and taking care to take all identified safety measures, in particular, verifying that conditions exist for safely entering the confined space;
- **Assistance Phase**: in case it was possible to recover the injured person before the arrival of Public Rescue, he/she should be placed outside the confined space, in safe conditions and waiting for the rescuers
- **Area Securing Phase:** after recovery and providing assistance, in order to prevent further damage to people/things, staff should make efforts to secure the area if necessary.

The contractor/subcontractor shall consistently adhere to company procedures regarding confined space access; copies of these procedures will be provided by the Contractor at kick-off minutes.

2.3 CONTRACTOR CONTROL (MATERIALS, MACHINERY AND EQUIPMENT) - HIGH RISK ACTIVITIES

The contractor/subcontractor shall ensure that all machinery, equipment and tools provided for the performance of contracted activities:

- comply with the requirements of the Law, suitable and safe in use, maintained in safe conditions and, where necessary, inspected to ensure that safe conditions are maintained;
- are used only by individuals who have received adequate training, information and, where provided, the necessary training;
- are equipped with protective devices capable of preventing access to dangerous parts of the machine/equipment. Please note that it is absolutely forbidden to remove or bypass machine/equipment protection systems during use.

In case portable electrically powered equipment is used it will be necessary:

- Verify that equipment is grounded or double-insulated. Electrical cable should be in good condition at all times and, when necessary, waterresistant;
- Carry out periodic inspections on the proper functioning of equipment, removing those that are unsuitable, faulty or do not comply with the provisions of the Law on safety at work;
- In the case of activities at construction sites/plants, only and exclusively ATEX equipment should be used;
- the Customer will be authorized to require the contractor/subcontractor to remove from the work area any material, machinery, equipment that the Customer considers unsafe, does not comply with the requirements of the Law, or does not undergo periodic maintenance as required by current legislation.

2.4 VEHICLE HANDLING AND PRESENCE OF VEHICULAR TRAFFIC-HIGH-RISK ACTIVITIES

The contractor/subcontractor will ensure that **all** vehicles, machinery, and equipment (owned, rented, or those of any subcontractors or sub-subcontractors) used in the performance of activities fully comply with current regulations.
Any vehicle, machinery, equipment without valid and up-to-date documentation and certificates shall be immediately removed from the work area.
Any vehicle that does not meet safety requirements or does not undergo the required periodic maintenance shall be immediately removed from the work area and rendered inoperable.
Drivers of construction site vehicles, equipment and vehicles shall at all times comply with the driving regulations and signage on the site/yard/facility.

Contractor/subcontractor personnel assigned to operate construction site vehicles and machinery must possess not only a valid driver's license but also adequate training and experience of driving the vehicle.
The commissioning authority, during the audits/inspections, may check the fulfillment of the requirements of the personnel assigned to operate the vehicles and, in case of non-compliance with the above requirements, may require the removal of personnel not properly trained.
All personnel present in the site/plant area or in areas where vehicles and equipment are maneuvered shall wear high-visibility vests for the duration of the work activity.
While operating the machines, all persons should maintain a safe distance of at least 2 meters from the operating area of the machine.

For parked motorized vehicles, the contractor/subcontractor shall ensure that:

- The engine is turned off and the vehicle made unusable by unauthorized persons (e.g., by removing the ignition keys), the handbrake pulled (and with the steering wheel locked for heavy vehicles).
- All elevated parts are adhered to the ground or placed in a safe condition (crane)
- No parked vehicles obstruct or make emergency exits inaccessible, for activities conducted at client sites/facilities.

2.4.1 Activities in the presence of vehicular traffic - Setting up road construction site and laying signs

Road construction site fence

The confinement of the construction site area should be carried out according to the surrounding environmental situation, checking for possible construction site-environment influences/interferences and vice versa. The area of the road construction site will necessarily have to be cordoned off for safety reasons, adopting a type of fence that is suitable both from the point of view of mechanical resistance to stress and from the point of view of protection from the projection of blunt masses to and from the inside of the site.

The conformation and height of the fence should be such as to prevent access by outsiders or unauthorized persons (e.g., minimum height of 2 m); the fence should be equipped with signage netting, and the paneling constituting the fence itself should be anchored to the ground by means of concrete foundations.

Operators accessing the site area must have and wear the following PPE:

- Safety helmet to be used for protection of the head from injury resulting from the projection or fall of materials from above, from suspended loads, from contact with injurious elements of various kinds. The helmet shall be used continuously while on site.

- Safety footwear of high type to be used for prevention and protection from the potential risk of cuts, abrasions, blows, impacts, compressions, tripping/slipping fall.
- Fluorescent vest with reflective elements for use, both day and night, on roadways in the presence of vehicular traffic or in other workplaces where there is a need to adequately signal the presence of operators in normal or poor visibility.

The personal protective equipment listed above is the minimum equipment required to enter the worksite.

Reporting Road Construction Sites

Regardless of the size, duration and type of work, when there is a road construction site, there is an obligation to properly place safety signs to inform road users of the work in progress and prescribe behaviors according to the situation.

The occupation of the roadway, areas designated for vehicular and pedestrian circulation or parking for any type of operation, regardless of the expected duration of the work (such as, for example, the execution of excavations for the laying or maintenance of underground pipes the opening of manholes, etc.) shall be adequately marked.

The presence of workers, equipment and any obstructions to normal traffic should be easily visible to vehicle traffic.

In the event that the duration of the construction site is extended into the night hours, or in case of poor visibility (e.g., due to fog), proper signaling of the construction site and its elements shall be ensured through the use of appropriate solutions.

It is reminded that it is forbidden to carry out works or deposits and open road construction sites, including temporary ones, on roads and their appurtenances, without having previously signaled the presence of the obstacle or place of work while still maintaining adequate traffic flow.

Temporary signs shall be removed immediately upon completion of the work, when the dangerous situation has ceased. Temporary signs should not conflict with permanent signs. In this situation, the latter should be

shielded (e.g., with black bags) and immediately reinstated upon completion of the work.
All vertical construction site signs must be made stable in all road and weather conditions by the use of soft ballast (sandbags):, therefore, the use of rigid materials (e.g., stones, bricks, etc.) that could pose a traffic hazard is prohibited.

2.5 WORK AT HEIGHT-HIGH RISK ACTIVITIES

All persons who work at height or will be required to supervise this type of activity shall be subject to formal competency verification by the Contractor/Subcontractor in order to analyze qualification, training received, and experience prior to commencement of Activities.
The Contractor/subcontractor shall ensure the presence and formal appointment of a competent operational supervisor to oversee each work activity where a fall from height hazard exists.
The Contractor/subcontractor shall ensure that its personnel have participated in training related to the hazards of working at height and are aware of the relevant prevention and protection measures to be taken. This training must be completed prior to the start of activities and copies of the certificates available if requested by the client during inspection/audit activities.
Whenever possible, collective prevention measures (e.g., elevating work platforms-LEPs) should be preferred over individual measures (e.g., use of harnesses)
When collective prevention/protection measures cannot be implemented, all personnel exposed to the risk of falls should always wear a harness connected to a secure anchorage point or rescue cable.
Below the area where work at height is being performed, the contractor/subcontractor shall prohibit access to personnel not strictly

necessary for the performance of the activity. This buffer zone shall be maintained until the activities are completed.
All equipment used in elevated locations should be secured against falling from heights; where this is not possible, alternative measures should be put in place to prevent falling.
All temporary openings in work areas (including excavations) should be made physically safe to prevent falls by using walkways to cross or segregate excavation areas not being worked on.

2.5.1 Use of equipment for carrying out work at height

All ladders, harnesses, elevating work platforms, scaffolds, and other equipment used for working at elevated locations or for fall prevention or protection shall be uniquely identified, listed in a register, and subject to formal and regular inspection by the Contractor/subcontractor.
All defective or uninspected equipment must be removed from the area or be physically prevented from being used.
All equipment (Including ladders, slings, ropes, scaffolding, etc.) shall be subject to inspection by the Contractor/subcontractor prior to use. Where scaffolding is to be installed at the site, the contractor/subcontractor shall ensure that the following documentation is present on site:

- Scaffold Assembly, Use and Dismantling Plan (PIMUS), scaffold booklet and Ministerial Authorization, for all scaffolds whose installation falls within a scheme-type.
- Scaffold Assembly, Use and Dismantling Plan (PIMUS), scaffold booklet and Ministerial Authorization and plan drawn up by a licensed professional (engineer or architect), in the case of scaffolds whose installation does not fall within a scheme-type.

The contractor shall provide verification of the laying plane, i.e., ensure that the actions transmitted by the uprights can be borne, with adequate safety margin, by the bearing plane of the uprights; The results of this verification and the considerations made shall be reported in the PiMUS.
Departures should also be shown in the working drawing, as well as in the PiMUS illustrated how they are to be plotted and laid.

The employer of the contractor/subcontractor in charge of erecting the scaffold shall identify in the PiMUS the type and method of making the anchors, in accordance with the booklet and any design provisions. Special cases, for which anchorage to the work served is not possible (e.g., in the case of demolition, etc.), should be made the subject of specific planning aimed at identifying the best solutions for the stability of the scaffold (strut ties, ballasts, etc.).
The scaffold erection team shall consist of at least three workers, one of whom shall serve as the supervisor. The supervisor will be responsible for directly supervising all stages of scaffold erection, dismantling, and transformation so that operations proceed according to the provisions within the PiMUS.
The Principal shall have the right to refuse the use of scaffolding that does not comply with the requirements of the Law or is not regularly maintained. Only specially qualified personnel will be allowed to design, erect, modify, or inspect and dismantle scaffolding.

It is also recalled that:

- the construction and use of scaffolds made of prefabricated loadbearing elements, both metal and non-metal, is subject to authorization by the Ministry of Labor pursuant to Article 131 of Legislative Decree 81/2008;
- The booklet, which accompanies the permit, shows the diagrams-types to be followed in setting up the scaffold;
- where the configuration of actual use is not among those stipulated in the schematics, it must be designed by a licensed engineer or architect;
- the design of the out-of-schedule scaffold shall include both a strength and stability calculation, (carried out according to the instructions that constitute specific annex of the ministerial authorization) and an executive drawing;
- the design configuration should refer, as a rule, to scaffolding elements under the same permit. Mixed solutions may be allowed only in compliance with the provisions already contained in the authorizations (generally aimed at allowing the use of tube-and-joint elements even in

the context of prefabricated frame scaffolds in order to overcome objective site constraints) or in compliance with the indications of ministerial circulars.

- all guardrails used to prevent falling shall be 1.10 m high with intermediate current at 55 cm maximum;
- the foot stop panel should be at least 15 cm high.

Before using any anchor points, rescue cables, fall arrest systems and ropes, the Contractor shall verify that they meet international standards and undergo periodic recorded maintenance.

A personal fall protection system consists of several connected elements:

- anchorage (point anchors, rigid and flexible lifelines);
- connector (a device for binding the harness worn by the worker to the anchorage);
- single lanyard, double lanyard, with or without dissipator; retractable device (devices that connect the connector to the harness);
- harness, worn by the worker.

The system protects the worker from the risk of falling from heights when, in relation to the risk assessment and having regard to the locations, collective protection devices have not been provided, subject to the principle of priority of collective measures (Art. 111 Legislative Decree 81/2008).

Distance to masonry served and temporary removal of parapets The scaffold should be set up so that the deck is well abutted to the work with a maximum gap of 20 cm between the deck and the elevation. Where this maximum distance cannot be met, a normal guardrail with foot stop should be provided between the inner posts as well.
The temporary removal of the inner guardrail or parts of it will make it essential to take equivalent and effective safety measures, such as securing the worker in restraint by means of personal protective equipment.

Use of scaffolding or wheeled bridges

The wheeled bridge is stabilized during work by appropriate devices (outriggers, protrusions, ballasts, wheel locking systems).
In case it is necessary to use trestles), the maximum work surface shall not be higher than three times the minimum size of the base.
Under no circumstances will contractor's/subcontractor's personnel be allowed on the mobile scaffold during the handling phases of the scaffold tower.
Where the configuration of actual use is not among those stipulated in the schematics, it must be designed by a licensed engineer or architect.
Access to work shelves is according to specific safety procedure established by the employer in accordance with the manufacturer's instructions.
Anchoring shall be carried out every two stories. A waiver of anchorage is allowed under the conditions set out in Annex XXIII D. Lgs. 81/2008.
The assembly, use and disassembly of the wheeled bridge must be reserved for workers possessing the necessary skills and knowledge, acquired through information, education, training (practical test and applied exercise).

Safety scaffold

At places of transit or stationing, a safety deck or valance shall be installed at the height of the ground-floor roof slab to protect against falling materials from above. This protection may be replaced with a continuous grating closure on the front of the scaffold if it has the same safety guarantees or with segregation of the area below.

Safety nets

The manufacturer who constructs a safety net according to EN 1263-1 shall provide a marking, indicating: name, reference standard, system, class, mesh type and size, mesh size, production control mode.
The use of safety nets as collective protection devices against falling from height in work at height descends from a risk assessment that also takes into account the type of work to be performed and the equipment used (e.g., risk of projection of glowing or sharp material that could damage the net, etc.).

The installation of nets shall be carried out in accordance with the manufacturer's instructions by workers possessing the necessary skills and knowledge, acquired through appropriate information, education and training.
Before proceeding with the installation, the installer should acquire the technical information necessary to verify the suitability of the structures to withstand the static and dynamic actions determined by the restraint offered to the net (either as a result of the arrest of the worker's fall or other external actions, such as wind).
The installer, upon completion of the installation, shall deliver to the user employer a certificate of proper installation and a copy of the net operating instructions.
Deterioration, particularly of the fabric parts of the net, which can be caused by multiple factors, is the cause of dangerous reductions in the performance offered by the nets, which, consequently, may no longer guarantee the arrest of the falling operator.
The user should record the performance of checks and keep relevant technical documentation.
Nets should always be labeled with the necessary manufacturing information to verify their service life expiration.

Railings

Railings constitute collective fall protection devices;
The technical standard establishes three different classes, functional for edge protection of work surfaces, having different characteristics of inclination and fall height.
Ways of fixing, mounting and dismounting:

- the contractor/subcontractor by reason of the type of edge (material, size, strength offered, etc.) and the planned work (e.g., waterproofing of the edge, installation of railings on the edge, etc.), shall opt for a type of fastening suitable to ensure the firm constraint of the parapet and to exclude - where possible - the temporary removal of the same in dependence of the work;

- the erection of prefabricated railings shall be carried out in accordance with the manufacturer's instructions by workers possessing the necessary skills and knowledge, acquired through appropriate information, training and instruction;
- upon completion of installation, a certificate of proper installation shall be drawn up.

2.5.2 Portable ladders

Portable ladders should be used only for access to or egress from a location/exit or when the use of alternative equipment is not possible.

In any case, stairs must comply with the requirements listed below:

- portable ladders should be secured at both the top and the foot to prevent accidental shifting, slipping, bumping or locking
- portable ladders should never be tied/fixed to pipes, ducts or ventilation ducts
- temporary portable ladders shall be and stored and safely stowed at the end of each workday
- portable ladders should be kept free of oil, grease and other materials that can cause slip hazards;
- portable ladders should be visually inspected daily by a competent person and approved for use before use;
- portable ladders with structural defects should be immediately taken out of service and removed from the work area.

Please note that for any type of activity, the use of non-CE marked, selfmade or damaged ladders is strictly prohibited.
Any work to be carried out on the roofs/roofs of the company's premises or facilities may only be carried out following authorization from Principal. All roof openings (including temporary openings) shall be physically secured to prevent possible falls.
Accesses to roofs must be made in compliance with all the requirements of current regulations.

2.5.3 Mobile elevating work platforms

Mobile elevating work platforms (MEWPs) can be used to perform work at height, which can be performed while remaining inside the platform and wearing specific PPE. MEWPs must comply with the requirements of current regulations and undergo periodic recorded maintenance.
All Contractor/Subcontractor Personnel assigned to use MEWPs must be properly trained, in accordance with the State-Regions Agreement.

Before use:

- contractor's/subcontractor's personnel shall conduct a pre-operational check, verifying the proper operation of "man-present" devices (pedals, mechanical locks, control levers, etc.). In no way will the use of unfit, damaged or non-compliant MEWPs (e.g., with hydraulic oil or compressed air leaks) be allowed;
- Make sure the ground is able to support the weight of the machine;
- Use outriggers (when present) before starting to lift the vehicle;
- Segregate the operations area, preventing unauthorized personnel from accessing the area.

MEWPs may only be used under suitable environmental conditions, preventing their use in adverse weather conditions (rain, thunderstorms, wind gusts over 12.5 m/s, fog, etc...)
Climbing on the guardrail, midcurrent and extendable arms will not be allowed during work activities. In addition, personnel must be constantly anchored to a certified fixed attachment point. It is also prohibited to exceed the maximum capacity of the MEWP and the maximum number of people allowed.
Equipment will not be allowed to be placed at the edge of the excavation or, for activities conducted at the client's sites/facilities, near emergency exits/escapes.

2.6 LIFTING ACTIONS - HIGH-RISK ACTIVITIES

Prior to the start of work activities, at the request of the Employer, the contractor/subcontractor shall prepare a lifting plan and send it to the Employer. The contractor/subcontractor should ensure that a competent operations manager is formally designated as supervisor of each lifting operation. Clear channels of communication should be established and maintained between each person involved in lifting with only one authorized person capable of giving instructions to the operator.
In all phases of work involving the lifting and handling of materials, under no circumstances will access be allowed into areas where equipment is operating and personnel stationed below a suspended load or between suspended loads and fixed objects.

All lifting devices and accessories shall:

- Have CE marking;
- be equipped with an owner's manual;
- Be uniquely identified;
- report the indication of the safety payload; - Be subject to periodic registered maintenance.

Prior to the use of material lifting equipment, the contractor/subcontractor shall:

- Conduct a pre-operational check, verifying the proper functioning of the machinery and its safety devices. In no way will the use of unsuitable, damaged or non-compliant equipment be allowed;
- Make sure the ground is able to support the weight of the machine and the material being moved;
- Make sure the equipment is designed and suitable for lifting the weight of the load (load capacity limits);
- Use outriggers (when present) before starting material lifting;

- Segregate the operations area, preventing unauthorized personnel from accessing the area.

The contractor will operate and maintain cranes and hoists according to the manufacturer's specifications and in accordance with the requirements of the Act. All defective, uninspected or unidentified (load safely/identification number) lifting accessories or equipment shall be removed from the site or taken out of service.

2.7 HAZARDOUS SUBSTANCES - HIGH-RISK ACTIVITIES

All chemicals used by the Contractor/subcontractor shall be identified and segregated to prevent potential hazardous mixtures.
All Contractor/subcontractor personnel shall be adequately trained in the specific hazards associated with the products used.
All hazardous substances shall be used, stored and disposed of by the Contractor/subcontractor in accordance with the MSDS and applicable regulations.
MSDSs and their updates should be available in the area covered by the activities and searchable by both contractor/subcontractor personnel and the client.
All chemicals should be properly labeled and stored to prevent potentially hazardous mixing and possible chemical reactions, including temperature dependent reactions.

Any expired chemicals should be disposed of according to the MSDS as well as in accordance with current legislative requirements.

Upon completion of contract activities, all unused materials/chemicals shall be removed from the area by the contractor/subcontractor.

2.8 ASBESTOS-CONTAINING MATERIALS

In the event that the contractor/subcontractor discovers asbestoscontaining materials during the performance of contract activities, it will be the contractor/subcontractor's obligation to notify the client immediately, stopping work activities.
Activities may resume only after authorization from the commissioning authority.

2.9 COMPRESSED GAS CYLINDERS

Gas cylinders must be stored and transported safely, identified and used in line with current legislation.

2.10 ELECTRICAL SAFETY - HIGH RISK ACTIVITIES

Activities on electrical installations or live parts may be carried out only by the Contractor/subcontractor's personnel duly trained and authorized by the client.

When foreseen, prior to the start of activities, upon the Customer's request, the Contractor/subcontractor shall submit all necessary evidence for the issuance of the authorizations required to carry out activities on installations.
Please note that, in the absence of a permit validated by the Client, no Contractor/subcontractor operator will be allowed to carry out activities on electrical installations or live parts.
It is in no way allowed to work on active systems if they are powered at high or medium voltage.
All activities on high- or medium-voltage electrical installations should be carried out in the absence of electric current, on isolated equipment, and only after verifying the actual absence of voltage by means of suitable device.

Activities on active systems (powered at low or extra-low voltage) will be allowed only to carry out measurement tests and/or verification of components.

The following protection and prevention measures should be taken during activities on electrical installations or live parts:

- any direct/indirect contact with live parts shall be avoided, using tools or materials appropriate to the type of voltage present and suitable PPE;
- before starting any activity on equipment that is no longer live, the actual absence of voltage must be verified by specific equipment;
- for activities carried out at the client's premises/facilities, it is the Contractor/subcontractor's obligation to keep live electrical panels locked;
- only the Contractor's/subcontractor's personnel, qualified for work on electrical systems, may work on live parts or enter/operate in distribution substations and/or transformer substations after obtaining specific authorization from the Customer.

2.11 FIRE RISK

During the course of activities at the Client's Sites/Facilities, access to emergency exits and firefighting equipment shall be kept clear at all times. The Contractor shall provide, install, and maintain its own temporary fire protection against hazards it introduces to the site (work areas, storage areas, and temporary facilities under its responsibility).
Contractor's/subcontractor's fire extinguishers are to be checked on a semiannual basis by Firm/qualified personnel; it is also required that the contractor's/subcontractor's firefighting equipment be visually inspected and the check recorded by the contractor/subcontractor on a monthly basis. The 'contractor/subcontractor shall not modify/disassemble fire prevention/protection systems without approval from the Employer. Only contractor/subcontractor personnel who are qualified according to current regulations will be allowed to work on the client's fire-fighting equipment.

2.12 GAS WORK - HIGH RISK ACTIVITIES

2.12.1 Commissioning of the pipeline The date and manner of commissioning of a new pipeline shall be agreed between the Client and Contractor/subcontractor, in compliance with applicable legislation, in accordance with the provisions of the Company's Technical Standardization and within the timeframe stipulated in the schedule.

The Contractor/subcontractor shall be equipped with appropriate probe instrumentation for gas detection (gas detector), which shall be used at each construction site, properly calibrated and duly maintained in accordance with applicable regulations.
The commissioning activities of the road pipelines shall be carried out under the supervision of the Client's personnel.

For both the commissioning and decommissioning of network sections, the operating methods should be carefully and appropriately chosen according to:

- Of the operating pressure;
- Of the volume, branching and location of the network; - Of the degree of network interconnection.

Operations should be properly scheduled and reported to any affected clients sufficiently in advance. In cases where operations cannot be scheduled, please refer to the client's Company Procedures/Instructions.

The following protection and prevention measures shall be taken when commissioning or decommissioning a network section:

- taking appropriate measures to avoid sparks due to potential differences between metal parts or static electricity discharges (e.g., on polyethylene pipes);
- no open flames or other sources of ignition should be present near the purging points, (cell phones should also be kept off) and suitable safety signs ("No Smoking" and "No Open Flames") should be displayed in accordance with current regulations;
- presence of suitable fire-fighting equipment (fire extinguishers);
- provision of safety measures so that the volumes of gas or inert released are not such as to cause asphyxiation.

During the course of work, only authorized personnel will be allowed access to the worksite area.
Purging operations, once started, must be completed without interruption. Should any interruption occur, the entire operation must be repeated.

2.12.2 Leakage repair methods

As a reminder, any technical work performed by contractor/subcontractor personnel must be done using PPE as stipulated in the SOP, as well as the fire-fighting equipment and means (e.g., portable fire extinguisher) accompanying the emergency response vehicle.
Appropriate instrumentation suitable for detecting the presence of gas (gas detector) at the intervention site should be carried on the shoulder at all times and ready for use.
Intervention equipment (e.g., tapping machines, obturator flasks) must be suitable for the specific task to be performed and approved in advance by the Client.
Gas leakage must be eliminated as soon as possible by constantly monitoring, with the appropriate methane gas detection instrumentation, the safety conditions of the system in order to take all precautions and actions to prevent the formation of explosive atmospheres or otherwise dangerous situations (e.g., by ventilating the environment through the opening of doors, windows, peepholes or by creating in various ways a ventilation of the air present).

In the event of gas leaks from piping or plant sections, regardless of pressure, it is the Contractor/subcontractor's obligation to promptly inform the Client (Reference Technician or On-Call Technician) of the situation encountered so that specific and appropriate operating instructions can be received.
Any work on steel pipelines that involves cutting the pipeline itself or otherwise stripping a section bare will require, as a preliminary step, the exclusion of the existing active cathodic protection system and the construction of an equipotential system to ground the pipeline in the sections upstream and downstream of the intervention zone.

2.13 EXCAVATION ACTIVITIES-HIGH-RISK ACTIVITIES

For the execution of excavation work, the Contractor/subcontractor shall engage only and exclusively competent and specifically trained personnel in accordance with the State-Regions Agreement.
Special preventive and protective measures should be taken if excavations present the following hazards:

- Excavation depth greater than or equal to 1.5 meters;
- possibility of water entry;
- Presence of foundations near the excavation or adjacent structures;
- Landslideable earth or rock (including previously excavated earth);
- Presence of underground facilities (gas, electricity, water);
- possibility of soil contamination (hazardous substances or unexploded devices);
- presence of simultaneous operations and possibility of landslides (considering the following potential events: sliding, collapse, overhang, uplift, ground shaking, flooding);
- presence of vehicle handling less than 3 meters away from the edge of the excavation.

<u>Excavations deeper than 1.5 meters</u> that require specific means of access shall be provided with rigid barriers and foot stop boards (or any suitable system to provide protection equivalent to that of the foot stop board) around the excavated point to prevent people and objects from falling. Foot stop

boards will not be required when a safety distance of at least 1.5 meters is maintained between the edge of the excavation the rigid barrier.
For this type of excavation, a protection system must be installed to prevent the excavation from collapsing (e.g., rebar, props, sheet piling, etc.).

For excavations less than 1.5 m deep, however, protection from the risk of falling must be ensured by using walkways covering the excavation or segregating the area not affected by the work (e.g., safety chain or flexible netting at least 1.1 m high)
Regardless of the depth of excavation, preventive measures for falling people or property shall be ensured when the space between the work area/transit area of personnel employed in the work activity and the excavation is less than or equal to 1.5 m.

Excavations with depths between 0.5 and 1.5 meters shall be provided with a rigid barrier around the excavated point to prevent people and material from falling, except when a safety distance of 1.5 meters is maintained by a visible safety chain or flexible net at a height of 1.1 meters.

The walls and bottom of the excavation shall be cleared of stones, roots, spikes and any other kind of material that has fallen within the excavation. All spoil shall be placed at a safe distance from the edge of the excavation such that there is no risk of landslides.

Regardless of the depth, at least every 15m length of the excavation, access/exit routes should be provided.
Before carrying out any activity in the vicinity of the excavation, the Contractor's/Subcontractor's Personnel shall conduct a daily check on the maintenance of prevention and protection measures to prevent falls and landslides.

2.13.1 Support of open pit excavations

Excavation protection must be in place for all activities involving personnel descending into an open excavation.

Wall support shall be provided whenever the excavation has a depth ≥ 1.50 m and when due to the particular nature of the soil or because of rainfall, seepage, frost or thaw, or for other reasons, landslides or ground shaking are to be feared.
Without prejudice to the prohibition of constituting deposits of materials at the edge of excavations, if, exceptionally, due to particular working conditions, this is necessary, appropriate shoring shall be put in place in accordance with the requirements of Article 120 of Legislative Decree No. 81 of April 9, 2008.
The support system shall be made by suitable wooden planks of sufficient thickness to withstand the thrust of the soil and in any case not less than 3 cm.
The planks should be arranged vertically, along the entire length of the excavation walls, side by side so that they form a continuous wall, and the upper ends should protrude at least 30 cm from the edge of the excavation.
Vertical elements should be continuous: elements obtained by joining several parts of axes are not allowed for use.
At least two crossbeams connecting the vertical elements should be placed on each wall, depending on the depth of the excavation:

- superiorly at an optimal distance of 25 cm from the edge of the excavation;
- Inferiorly at an optimal distance of 10 cm from the bottom of the excavation.

As an alternative to wooden supports, retaining systems consisting of prefabricated elements that provide the same level of protection may be used. This mode of reinforcement is preferable for the protection of excavations of significant depth.
The retaining system should be put in place at the same time as the excavation progresses and be removed only after the excavation is backfilled.
It is emphasized that the above implementation methods are not exhaustive, but only highlight some general guidelines for supporting open pit excavations.

2.14 WELDING ACTIVITIES

Welding activities shall be carried out by qualified personnel meeting the requirements of the Law, using oxyacetylene system and/or with motor welding machines.

In particular, for the use of oxyacetylene cutting and welding cylinders, the qualified welder shall take all prevention and protection measures provided within the PSC / SOP) such as:

- Correct position and stable fixation of the oxyacetylene system;
- Protection of the gearbox against accidental shocks;
- maintenance in good condition of pipes is present check valves;
- Correct posture on the part of the welder;
- appropriate niche for the welder's work to avoid risk of burial, which involves excavation with walls at the natural angle of slope of the ground and/or protection with shoring systems.

For electrical welding using a power welder, this should be CE marked and, when provided by the manufacturer, the grounding system should be connected to the generator set to prevent electrocution hazards. The site supervisor should always verify the proper use of PPE specific to welding activities (Facial Shield with slide, Apron and crust gloves, head cover, etc.).

2.15 WATER REPAIR ACTIVITIES

The activity consists of water repair, by means of plugging holes in the pipe, replacing sections of pipe, replacing valves and vents.

When necessary, the Contractor/subcontractor will compile the Out-of-Service for the emptying of the pipeline and then perform the emptying maneuvers through the appropriate drains. The Contractor/subcontractor will be authorized to operate only and exclusively when emptying is obtained.

Alternatively, if it is not possible to empty the pipeline completely, the Customer will inform the Contractor/subcontractor, who shall proceed with controlled and limited water emptying systems (e.g., pipeline drilling,

unscrewing bolts with few threads, cutting pins no more than 30 percent of the total).
If it turns out that there are operational conditions to carry out pressure repair by chipping and plate welding (e.g., max. 10 bar pressure, hole size, pipe wear condition, excavation condition, etc.), the
Contractor/subcontractor will proceed with the repair activity.
During such activities, worker behavior and proper use of the provided PPE is important; monitoring of the actual use of the provided PPE will be carried out by the Contractor/Subcontractor's Supervisor.

2.16 ENVIRONMENTAL REQUIREMENTS

2.16.1 Waste management

Waste management (from initial classification to final management) is the responsibility of the contractor/subcontractor for any type of waste generated by the Works under the contract; however, the contractor shall provide evidence and reporting regarding the proper application of regulations (refer to contract clauses pertaining to waste management). Collection and storage will be allowed in the construction site area only if agreed upon in advance with the client and authorized; transportation, storage, and handling of waste must be carried out in accordance with applicable regulations and disposed of at suitable final management facilities.
Waste produced by the contractor/subcontractor's activities should be categorized with specific EWC/EER Code and stored in a manner that does not create hazards to the personnel present or to the client.
The Contractor/subcontractor will take all necessary precautions to ensure complete protection from soil and subsoil contamination.
In the event that the Contractor/subcontractor fails to comply with waste management requirements, the Client reserves the right to impose contractual penalties, including suspension of work activities.
The digital traceability of the waste chain based on the RENTRI system is recalled.

The system is regulated by Ministerial Decree No. 59 of April 4, 2023, which defines its organization, models (loading and unloading registers and waste identification forms) and operating methods in implementation of Article 188 bis of Legislative Decree 152/2006.

2.16.2 Spill prevention and control

The Contractor/subcontractor shall implement all precautions to ensure that no type of waste, contaminated water or substances can contaminate the soil/subsoil.
Any liquid waste produced by the activities performed by the Contractor/subcontractor on site shall be collected, and disposed of in accordance with applicable regulations.
It is the Contractor's/subcontractor's responsibility to identify all waste disposal laws and regulations and to act in full compliance with such laws and regulations; liability for accidental and non-accidental occurrences will rest solely with the Contractor/subcontractor
The Contractor is responsible for the provision, management and control of the spill kits that must be on site, and for informing and training its personnel in their use; in the event of an accident, the costs of cleanup/remediation and waste management will be fully borne by the Contractor.

2.16.3 Emissions

The Contractor shall implement all measures to minimize atmospheric emissions, noise, dust and fumes of any kind.

SECTION 3 - INSPECTIONS AND VERIFICATION OF CONTRACTOR HSE PERFORMANCE

The Contractor/subcontractor shall make itself available for the performance of audits and inspections of the contracted activity, carried out by the contracting authority or by Companies contracted by the contracting authority, at a frequency determined by the contracting authority.

For the conduct of inspections, the commissioning body will rely on the documentation in Annex 1 (inspection check list), while different check lists prepared by the commissioning body, contracted companies or certification bodies (e.g., DNV) may be used for the conduct of audits.
Based on the evidence from the audit/inspection, deviations may be found on high-risk activities, for which the contracting authority may implement the contractual measures/penalties in Section 1.7 of this document.
The result of inspections or any other control may result in contractual penalties as shown below.

SECTION 4 - MANAGEMENT OF DEVIATIONS / NON CONFORMITIES IN HSE

The Client will notify the Contractor whenever it believes that the Contractor (or any of its subcontractors) has violated HSE requirements.
If the Contractor fails to take appropriate corrective measures to correct the violation within a reasonable time or within the time frame specified by the Customer, the Customer shall have the right to correct such violations directly (including through a third party) by reimbursing the Contractor for the costs involved.
Whenever the Contractor/Subcontractor deems that a violation of HSE requirements requires the Work to be stopped (as stated in the "Zero Tolerance to Deviations" section contained herein), the Contractor/Subcontractor shall stop the Work, in which case the Contractor/Subcontractor shall remain responsible for the costs and delays due to such a stoppage, as well as the specific costs incurred to bring the situation back to normal. The work stoppage will be maintained until corrective actions implemented by the Contractor/subcontractor are completed.
In the case of deviations in high-risk activities, suspension of the activity will be awarded according to Section 1.7

In the event of an accident/accident due to violation of the HSE Requirements by the Contractor/subcontractor during the performance of the Works under the contract, the Contractor shall be liable for all losses, damages and any penalties by the Competent Entities, indemnifying and holding the Customer harmless with respect to the same.

If the relevant breach constitutes a serious violation of the agreement, the Principal shall have the right to terminate the contract in accordance with the terms of the contract.