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POLICY FOR PREVENTION OF MAJOR ACCIDENTS IN TEMPA ROSSA OIL CENTRE


Rev ##	Date	Main modifications
03	09/07/2022	Complete review as per 1 st Seveso audit findings (R2), actions as per annual Gestore Review and bi-yearly mandatory review.
02	10/07/2020	Biennial review and update to the new organization for production phase.
01	13/07/2018	SGS joint integration. Change of references for factory. Integration of the implementation program.
00	11/08/2017	1 st issue.

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1. INTRODUCTION

The policy document for the prevention of major accidents (incidenti rilevanti), drawn up by the Gestore (Asset Director) of the TEMPA ROSSA OIL CENTRE plant operated by TotalEnergies EP ITALIA SpA (hereinafter TEPIT¹), describes the general and specific objectives of the Safety Management System (SGS) adopted, its structure, the defined implementation and improvement program, the reference principles and standards and is shared with all stakeholders.

With this document, drawn up in accordance with the provisions of Article 14 and Annex B of Legislative Decree 105/2015, the Gestore undertakes to adopt and maintain what is stated below, with the aim of managing and controlling all activities that may have an impact on the prevention and control of major accidents, on the protection of human health, the environment and assets.

The policy document in compliance with current legislation is implemented and kept active by the company organization and periodically updated at least every two years.

In its development, due consideration was also given to:


- the Health, Safety, Environment and Quality Charter (0-CHA-HSEQ-001) of TEPIT;
- The principles and expectations One-MAESTRO (DIR-GR-HSE-001 & CR-GR-HSE-001), the framework of the HSE management system of the TotalEnergies group.

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

The phases for the implementation of an SGS-PIR within a company meet the requirements of Annex B of Legislative Decree 105/2015 with the following phases:

- ✓ **Initial examination** (analysis of both primary and support business processes, through the reconstruction of the phases, identification of the activities carried out, of the subjects involved, of the inputs and outputs, of the health and safety risks connected to the aforementioned elements, of the major accident related to the use of hazardous substances, the mandatory regulatory requirements relating to the specific nature of the activity carried out);
- ✓ **Policy definition** (identification of objectives and commitments that the Gestore assumes, consequently to the indications of Article 14 of Legislative Decree 105/2015, as evidenced by the initial analysis, to the production capacity of the company system);
- ✓ **Planning** (drafting of a plan of the activities necessary to achieve the specific objectives, with identification of the activities and resources required, times, persons in charge of execution and verification, indicators and standards for the periodic assessment of the degree of achievement of the objectives);

¹On May 28, 2021, the Shareholders' Meeting approved the resolution by which the company name of the group changed from Total to TotalEnergies starting from June 1, 2021 and therefore the name Total E&P Italia changed to TotalEnergies EP Italia starting from 1 August 2021.

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- ✓ **Organization** (definition of the company organization chart for the achievement of objectives with identification of tasks, authorities and responsibilities) and preparation of the necessary management tools such as manual, procedures, forms, ...);
- ✓ **Staff awareness** (provide all the subjects and company functions involved in the SGS-PIR with the knowledge and skills necessary for carrying out an active and effective role in the pursuit of individual objectives);
- ✓ **Monitoring** (periodic checks with respect to the performance of the system in terms of its effectiveness and efficiency);
- ✓ **Review** (identification of the system objectives achieved with the setting of adequate corrective and preventive actions to be included in an improvement plan).

The strategic and concrete advantages that a production activity can obtain by investing in the SGS, in the correct and safe management of the plants and in the promotion of staff awareness are:

- The reduction of the risk of major accidents, obtained through the timely verification of the efficiency of the systems and through the reduction of operational management mistakes;
- The improvement in the management of primary and support processes, and therefore of the resources available;
- The monitoring and reduction of safety costs (injuries, accidents, non-compliance in general);
- the active and continuous involvement of subjects in a path to improve individual and company performances;
- the positive comparison with the supervisory body and the control bodies.

2. DEFINITION OF GENERAL AND SPECIFIC OBJECTIVES FOR SGS

TEPIT has the primary objective of ensuring the balance between corporate purposes and the needs of safeguarding the health and safety of people and, more generally, the environment.

It is the Company's will to operate in compliance with the safety of its employees and the people who live and work near its factory, preventing the occurrence of major accidents and mitigating any harmful effects.


As priority, the activities to be carried out in conditions of safety, and for this reason the company has developed and applies an Integrated Safety Management System (SGS), based on the line indicated by Legislative Decree 105/15 and on workplace safety regulations (Legislative Decree no. 81/08 and subsequent amendments).

TEPIT commitment to ensure:

- The protection of the safety of workers, the population and the surrounding environment as far as economically and technically possible.
- compliance with laws and mandatory regulations on safety and the environment, or, as far as they are not governed by them, with national specifications and standards.

To this end, the Gestore guarantee to pursue the following specific company objectives:


1. **Leadership and Management Commitment**- The key positions within the organizational structure of the Oil Centre and for the SGS Management System are identified by recognizing

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that people, safety and environmental protection are managerial responsibilities that extend from the operational work teams to the Management. As a result of this commitment, adequate resources are made available to support the implementation of this Policy document;

2. *Compliance with Laws, Regulations and Company Requirements-* Compliance with all applicable laws and regulations, with the One-MAESTRO framework and TotalEnergies rules applicable in all its activities and operations, developing the Safety Management System according to the fundamental elements of the Seveso Directive.
3. *Risk management-* Ensure that the hazards are systematically identified and that the risks are managed effectively to prevent HSE events, identifying any downgraded situations or threats to integrity, as well as related mitigation or corrective measures;
4. *Operational Responsibility-* Management of the plants in compliance with the operating manuals that contain the instructions for the control of the processes and equipment of the Tempa Rossa Oil Centre in the different operating conditions and in particular for the management of alarms and blocks or inhibitions. At the same time, specific procedures are drawn up for the management of change, of the different operating conditions, in particular of temporary stops and start-up phases, to define the inspection, testing and maintenance activities of the assets and to systematically identify the technical equipment critical to the protection of personnel safety and / or environmental protection (SECE);
5. *Contractors and Suppliers-* promote the selection of suppliers and contractors on the basis of their ability to apply policies similar to their own in the fields of safety, protection, health, environment and quality. In order to ensure compliance of the supplies of equipment, materials and services with the minimum requirements of safety standards, the necessary controls, criteria and procedures are defined within the HSE management system;
6. *Skills and Training-* Ensure that all personnel, internal or external, have received adequate and sufficient training and information to be fully competent for the tasks they are required to perform, identifying an HSE training matrix as well as mandatory training, including induction before authorizing the access into the Oil Centre;
7. *Emergency Preparation-* Implement a solid and documented emergency response organization capable of effectively addressing situations that can cause a major accident. Organization in line with scenarios and Top Events identified in the safety studies, at the basis of the internal / external emergency response plans, verified and improved following events, testing roles, job tickets and vehicles with periodic exercises / training;
8. *Learn from Events-* Promote a positive culture of safety and the environment through the organization, applying the TotalEnergies Golden Rules, encourage the reporting and analysis of anomalies, accidents and HSE events, the analysis through the fault tree in order to identify barriers, preventive and corrective actions and sharing through the Return of Experience (REX) process from TEPIT sites and / or alerts from headquarters or notifications / feedback on safety;
9. *Monitoring, Audit and Inspection -*Continuously monitor the effectiveness of the SGS management system through audits, inspections and technical reviews and reporting the result to management;
10. *Performance Improvement-* Identify measurable key performance indicators aimed at preventing the occurrence of both serious and occupational accidents and which can be used to reliably monitor the affiliate's overall HSE performance.

These objectives are summarized in the document 0-CHA-HSEQ-002 posted on Site and are developed as detailed below, thanks to the organizational structure and documentation of the SGS.

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3. GENERAL PRINCIPLES AND REFERENCE STANDARDS

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

THE GESTORE'S COMMITMENT

The **Gestore** is constantly committed to the implementation of the Major Accident Prevention Policy, demonstrating its consistency and maximum involvement in its behavior. The commitment assumed is continuously transmitted to all those who work within the sites, implementing the appropriate actions and the necessary controls aimed at verifying the effectiveness of the implementation.

RESPONSIBILITY FOR THE PREVENTION OF MAJOR ACCIDENT RISKS

The responsibility for implementing the Policy and the safety objectives defined lies with all managers, supervisors and workers, as regards the relative competences, powers and roles assigned.

THE MOTIVATION AND PARTICIPATION OF EMPLOYEES AND THE INVOLVEMENT OF CONTRACTORS

The motivation of employees and their sharing of the Policy document for the prevention of major accidents, the involvement of contractors are indispensable tools for achieving the objectives set in the prevention of major accidents.

The Gestore promotes:

- ✓ the dissemination of the culture of accident prevention;
- ✓ the creation of a continuous communication system;
- ✓ the enhancement of the opinions and ideas of employees in the field of accident prevention.


The communication process finds its place:

- ✓ in moments of information, education and training,
- ✓ in meetings,
- ✓ during checks and controls,
- ✓ during safety analyzes (eg accidents, near misses, risk).

For this, the following have also been developed:

- a special "Seveso & Tempa Rossa" sharepoint in the company intranet system,
- a dedicated internet page "Seveso III Directive & Tempa Rossa"
- information modules using the e-learning platform, for the transmission of updated documents to all internal and external personnel.

RELATIONS WITH INSTITUTIONS AND THE COMMUNITY

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The relationship with the bodies delegated to check compliance with the legislation and with the representative institutions of the population is based on maximum collaboration, clarity and transparency.

The conduct of the activities takes into account the following needs:

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

THE BEST TECHNOLOGIES AND THE MAINTENANCE OF THE PLANTS

In the introduction of new plants, new technologies and new substances, preference is given to plants, equipment, machines, equipment, devices and materials that have the best characteristics from the point of view of safety.

The assets, plants, equipment, machines, equipment, devices and in general the material elements competing in the operations are subject to maintenance activities to ensure their reliability and safe operation.

THE DOCUMENTABILITY AND TRACEABILITY OF THE SHARES

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

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

3.1. REFERENCE LEGISLATION & GUIDELINES

The safety management system draws its main inspiration from the following reference legislation:


- Legislative Decree 26 June 2015, n. 105: implementation of Directive 2012/18 / EU relating to the control of the danger of major accidents connected with dangerous substances;
- Standards and anything else listed in the Register of Applicable Legislation (REGLEG), a tool of the SGS which also ensures that the presence of updates and changes to the applicable legislation is constantly checked. The register and regulations are made accessible and consultable through the sharepoint "Seveso & Tempa Rossa" to all staff.

Furthermore, within the TotalEnergies guidelines, the SGS draws inspiration from:

- CH-GR-HSE-001 Safety Health Environment Quality Charter -TotalEnergies Group
- Group directive DIR-GR-HSE-001 - One-MAESTRO HSE principles
- CR-GR-HSE-001 - one-MAESTRO HSE expectations
- Health Safety Environment Quality Charter TotalEnergies EP Italia SpA (0-CHA-HSEQ-001).

4. STRUCTURE OF THE SAFETY MANAGEMENT SYSTEM (SGS)

The **Gestore** is committed to implement, adopt, as well as maintain and seek the continuous improvement of its safety management system for the prevention of major accidents in implementation of the requirements of art. 14 paragraph 5 of Legislative Decree 105/2015.

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4.1. GENERAL REQUIREMENTS OF THE SGS

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

In particular, the SGS must:

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

The TEPIT SGS meets these requirements and has been prepared and shared by the safety workers representatives RLSA.

4.2. STRUCTURE OF THE SGS

The SGS incorporates the part of the company's general management system relating to organizational structure, responsibilities, practices, procedures and resources.

The SGS also refers to elements of the general management system relating to quality, safety and hygiene in the workplace and environmental protection. In particular, it is linked to the referential procedures of the TotalEnergies Group and this aspect allows the sharing of good safety practices and operational experiences of all the operating sites of the various branches of the group, favoring the improvement and continuous growth of the Management System and of security personnel.

The SGS is structured in such a way as to define:


- a. company safety policy and management;
- b. technical, administrative and human resources organization;
- c. planning of the activities concerned;
- d. measurement of the performance achieved in terms of safety and the environment against specified criteria;
- e. performance verification and review, including safety audits.

4.3. DETAILS OF THE SGS

In compliance with Annex 3 and the guidelines defined by Annex B of Legislative Decree 105/15, the **fundamental elements of the Safety Management System** for the prevention of major accidents developed by TEPIT. for the TEMPA ROSSA OIL CENTER are:

1. Organization and staff
2. Identification and assessment of relevant hazards
3. Operational control
4. Change management
5. Emergency planning
6. Performance check
7. Control and review

4.3.1. Organization and staff

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The key positions within the organizational structure of the OIL CENTRE for Safety Management have been identified by assigning to the different functions the responsibilities and tasks regarding the Prevention of Major Accidents, in line with the affiliate organization chart.

The requirements and criteria adopted for the definition of the needs and procedures relating to the training, information, training of the personnel, own or of third parties, involved in activities relevant to safety for the OIL CENTRE plant, are also defined through the SGS-04 procedure - *Management of awareness, information and training for HSE*.

In addition, the use of safety equipment and individual and collective protective equipment for major accidents is defined in the SGS-16 procedure - *Management of Personal Protection Equipment*, while the procurement of safety and / or emergency equipment and equipment in accordance with the Internal Emergency Plan for the OIL CENTRE plant and in the specific emergency plans summarized in the SGS-08 procedure - *Affiliate Emergency Response System*.

4.3.2. Identification and assessment of relevant hazards

The initial assessment of major accident risks was carried out and reported in the **Seveso Safety Report** (RdS) pursuant to D.Lgs. 105/15. In parallel, the Technological Risk Assessment study for major accidents was developed according to TotalEnergies rules and the results of both were included into the Major Risk Register. The RdS contains the assessments made regularly updated following the technical changes made to the plants, as required by the SGS-18 procedure - *Management of Change*.

This information is available for verifying compliance with the minimum safety requirements regarding spatial planning, in order to assess the suitability of the safety measures adopted, identify possible areas for improvement, provide the source terms for emergency planning, internal and external and constitute the basis for information, education and training activities. The methodology for identifying hazards and assessing the risks of major accidents and the measures to be adopted to ensure a reduction of the risk are defined within the SGS-07 procedure - *Hazards Identification and Major Risks Assessment*.


The methodology for identifying hazards and measures to reduce the risk of chemical agents present in the facility is described within the SGS-15 procedure - *Management of chemical substances and MSDS*, where specifically the management of archiving, distribution and updating of safety data sheets of dangerous substances present in the plant is regulated.

For the purposes of preventing the risks of major accidents, the assessment and reporting of HSE events such as accidents, accidents, or near-misses and operating anomalies are analyzed and recorded through the SGS-11 procedure - *HSE events and incident reporting*.

The safety requirements aimed at achieving the objectives of the Policy and those identified in the SGS Improvement Plan for the OIL CENTRE plant, are defined and established through the SGS-03 procedure - *Objectives, Targets and improvement program* for the plant.

4.3.3. Operational control

TEPIT guarantees the management of the plants in compliance with the Operating Manuals which contain the instructions for the control in the different operating conditions of the

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processes and equipment of the OIL CENTRE and in particular for the management of Alarms and / or Trips.

Furthermore, the Operating Manuals also define the different operating conditions of the OIL CENTRE plants, in particular the temporary stops and the start-up / startup phases, in order to define the verification, testing and commissioning of machines and critical equipment.

In order to ensure that the supplies of equipment, materials and services meet the minimum requirements of the safety standards, the necessary checks, criteria and procedures are defined in the Operating Manuals, User and Maintenance Manuals of the manufacturers / vendors and in the SGS-13 procedure - *HSE policy for supplier and contractor management*.

All the information necessary to perform maintenance on the plants in full compliance with safety is provided through the system of work permits and access to the operational areas as defined in the procedures SGS-14-*Work permits* and SGS-21 - *Personnel access in Tempa Rossa Areas*.

Through the specific Inspection and Maintenance Plans for the OIL CENTRE and the SGS-19 - *Inspection and Maintenance* procedure, the criteria and procedures for maintenance, inspection and periodic verification are also defined, which allow to guarantee the reliability of every part of the plant relevant to safety and the monitoring and control of the risks associated with aging (corrosion, erosion, fatigue, etc.) of equipment and systems.

In particular, the Inspection and Maintenance Plans also define the periodic verification and updating of ground systems and the classification of hazardous areas for the devices of the OIL CENTRE, as well as checks on critical equipment and pipes.

The SGS-20 procedure - *Identification and management of SECEs for the prevention of major accident risks* describes in particular the identification and management of the plant elements (instruments, structures, appliances, etc.) that have been identified as critical for the prevention of major accidents.

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


The procedures for introducing, defining and updating management procedures and operating instructions (in normal, anomalous and emergency conditions) are also defined.

4.3.4. Management of change

Technical (process or plant), organizational and / or procedural changes, or the design of new plants, being a critical element in the prevention of major accidents, are analyzed, controlled and verified in the design, implementation and start-up phases.

In accordance with the SGS-18 procedure - *Management of change*, before making changes to the systems, all the necessary documentation is then prepared to demonstrate the change to be made, with the assessment of any consequences on safety and with the clear assignment responsibilities and tasks for the design, construction and testing phase.

Once the modification has been made, the modalities for the delivery and acceptance of the modification itself, the training program, information and training necessary for the management of the modified plant are defined.

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4.3.5. Emergency planning

The correct management of emergencies connected to possible major accident scenarios makes it possible to effectively limit damage to people, the environment and plants.

The Internal Emergency Response Plan (PEI) has been drawn up which indicates the training methods for the personnel involved, the necessary periodic exercises in accordance with art. 20 of Legislative Decree 105/15, the emergency operating procedures.

The PEI also defines the necessary organization for correct emergency management through the assignment of specific roles and tasks and the description of the devices, safety equipment and alert systems.

Within the PEI, the methods of notification of the occurrence of a major accident, major near-accident and communications outside the plant following an emergency are also defined.

The procedures for carrying out remediation and restoration after the relevant emergency as well as the management of the mobile vehicles provided for intervention in the event of an emergency are also defined.

The correlation between the PEI and the other emergency plans governing the emergency management of TEPIT in compliance with the applicable legislation, for example in the context of the External Emergency Plan, or according to the guidelines of the group is described in the procedure SGS-08 - *Affiliate Emergency Response System*.

The protection and intervention measures to control and contain the consequences of an accident have been identified on the basis of the information and the results of the analysis of the source terms and of the accident scenarios, as foreseen in the risk assessment activities (RdS and TRA). To this end, the consequences of possible major accidents on the plants, on the personnel, on the external population and on the environment were assessed.


The emergency operating procedures, contained in the PEI, contain detailed descriptions of the measures and devices for limiting the consequences of a major accident, as well as the safety equipment, available resources and alarm systems. The staff responsible for implementing the measures themselves is also identified within the PEI through the organization chart for emergencies, highlighting the different roles and responsibilities regarding the treatment of the emergency in its various phases of alert, alarm, intervention, evacuation, restoration, external relations and support for the implementation of measures adopted externally.

4.3.6. Performance check

The Safety Management System provides for the adoption and implementation of procedures for verifying the pursuit of the objectives defined by the major accident prevention policy and by the HSE-RIR management system itself.

The definition of the HSE and RIR objectives for the OIL CENTRE plant, aimed at the continuous improvement of performance, and the planning of the implementation of the objectives through an implementation program is described in the procedure SGS-03 - *Objectives, Targets and improvement program*".

The achievement of the objectives is constantly detected through the adoption of appropriate performance and efficiency indicators, which are collected and analyzed through the SGS-09 procedure - *Monitoring, measurement and RIR efficiency indicators*. These indicators allow a

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concise and rational measurement of the performance of the Management System and allow to evaluate its proper functioning specifically for the OIL CENTRE.

The results of the analyzes carried out are used to carry out the review and evaluate any margins for improvement of the Safety Management System adopted, as required by Legislative Decree 105/15.

4.3.7. Control and review

The procedures for periodically evaluating the Major Accident Prevention Policy document and the procedures for verifying the effectiveness of the Safety Management System in relation to the objectives set and the regulatory provisions are defined.

To this end, through the SGS-10 procedure - *HSE & Operational Audit Management*, the modalities and timing adopted for the control of plant safety requirements and compliance with laws and regulations, indicating accordingly the necessary corrective actions and the modalities of their implementation.

The corrective actions deemed necessary by the inspections (audits) and the examination of the RIR efficiency indicators measured are reviewed by the Gestore together with the Plant Management as detailed in the SGS-12 procedure - *Gestore Review* and are included in the SGS improvement plan.


5. IMPROVEMENT PLAN OF THE SAFETY MANAGEMENT SYSTEM

The implementation and improvement program, normally issued as an output of the Gestore's Review and attached to this document, is drawn up on the basis of regulatory requirements, in order to ensure compliance with current legislation, and on the basis of the general and specific objectives reported. in the previous paragraphs of this policy document.

Particular attention is paid to the constant identification of objectives that can reduce the type, number, frequency and magnitude of the accidental events hypothesized for the plant, through replacement or containment interventions, and through constant training and training of the own staff.


It is also the company's responsibility to derive its improvement objectives from the analysis of the operational experience and from the performance of the performance indicators, so as to identify the most suitable intervention areas for the company.

These objectives are also identified based on the historical experience gathered in similar establishments.

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ANNEX A - LIST OF SGS DOCUMENTS FOR PREVENTION RIR

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

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ANNEX B - CHART HEALTH SAFETY ENVIRONMENT QUALITY TEEPIT

Safety, health, environment, quality and energy charter

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

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

Philip CUNNINGHAM
Managing Director

Original signed



October 2023

ATTACHMENT 1 – IMPROVEMENT PLAN OF THE SAFETY MANAGEMENT SYSTEM FOR THE PREVENTION OF MAJOR ACCIDENTS/INCIDENTI RILEVANTI – SEE GESTORE REVIEW FEBRUARY 2024

BACKLOG - 2023 TARGETS

Seveso Element	Activities	Scheduled times/ Delay details	Implementation Leader and Actions
<p>4.Operational Control</p>	<p align="center">TARGET 5/2023</p> <p>DGS 42 (LPGC) LPG PUMP RECYCLE LINE CONFORMITY (missing ESDV). To replace manual valves 40-HV-39270 and 40-HV-39271 by SDV with a closure action on Fire & Gas detection or PALL of the pump seal oil loop.</p>	<p>As per 2022 Plan and backlog 2023 Plan. <i>Rescheduled for Q2/2024: during pit stop.</i></p> <p><u>DELAY JUSTIFICATION</u> Not done during FFSD 2023 since it was not possible to empty the LPG bullets completely and perform the activity safely. In addition, a new solution was launched in parallel.</p>	<p>➤ FOPS DIRECTION Leader: I. Rea Action: See RFM_TR_22_069 LPG.</p>
<p>4.Operational Control</p>	<p align="center">TARGET 6/2023</p> <p>DGS 40 – Fireproofing Proceed with budget and planning for corrective actions listed as Priorities 1 and 2 into Carboline/Inspection report “CC21313_OC FIREPROOFING_070621_ADC”.</p>	<p>As per 2022 Plan and backlog 2023 Plan, the activity was planned as following: Step 1 – FFSD 23, completed. Step 2 – Q4/2023 launch of CFT & activities. Performed Q1/2024. Step 3 – Completion of activity Q3/2024.</p>	<p>➤ FOPS DIRECTION/ENG&CONSTR Dept Leader: C. Bove Action: - Step3: SOW issued in Feb 2024.</p>
<p>3.Identification & Assessment of Significant Hazards</p>	<p align="center">TARGET 7/2023</p> <p>New complete Detailed Risk Assessment in compliance with Major Risks prevention policy as per CR-GR-HSE-301 & GS-GR-HSE-312 in the mainframe of TRA 5-years review, with elaboration of updated bowties and major risk register (see SECE).</p>	<p align="center">Rescheduled for Q2/2024</p> <p><u>DELAY JUSTIFICATION</u> Activity started in Jan 2023 and not completed as per original planning because Contractor was also involved with Seveso RdS Istruttoria phases for OC/LPGC (meeting, site visit, reports to be issued) and SGS Inspection GPLC.</p>	<p>➤ HSE Direction Leader: V. Arculeo Action: Finalize the DRA.</p>

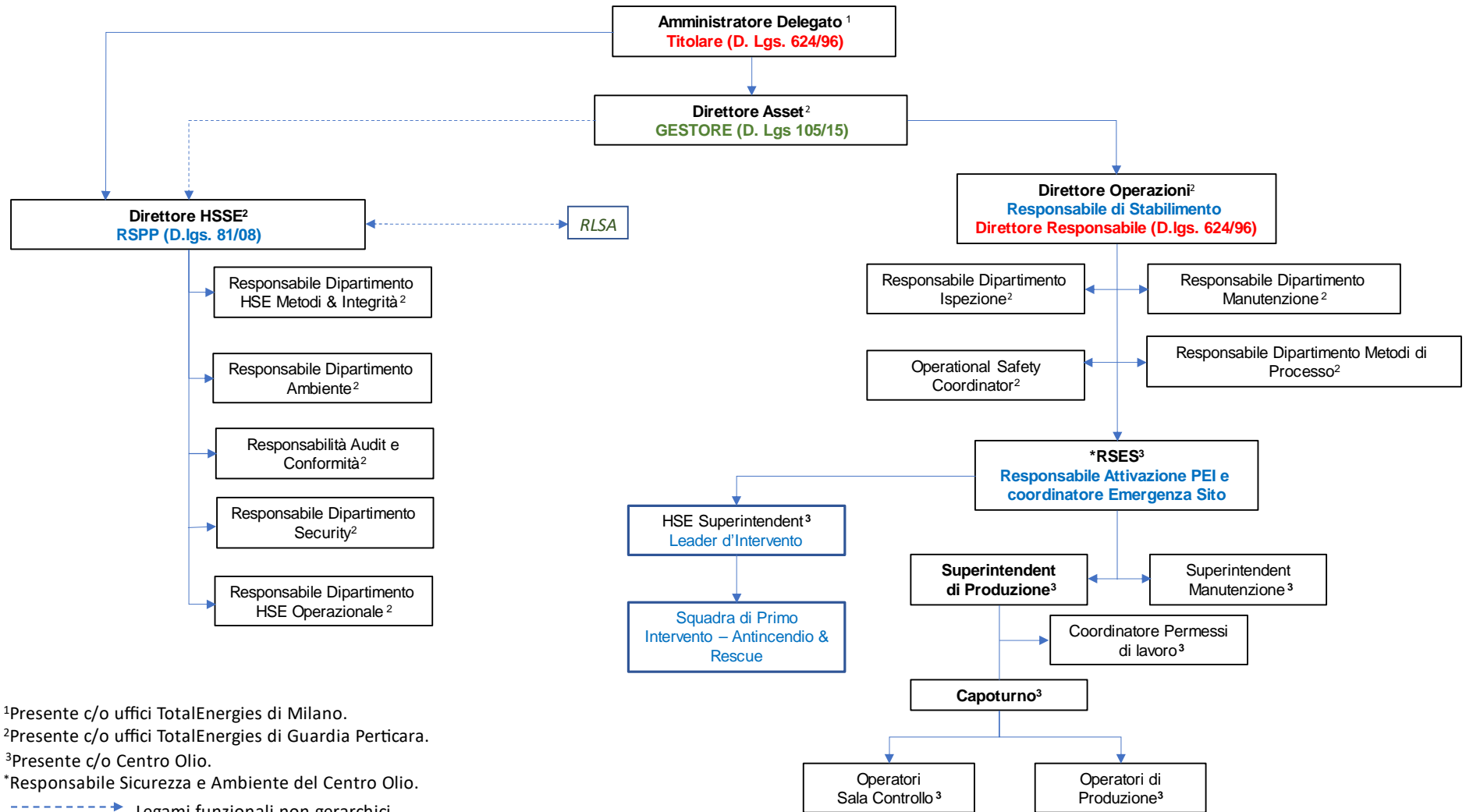
NEW TARGETS 2024

Seveso Element	Activities	Scheduled times	Implementation Leader and Actions
<p>3. Identification & Assessment of Significant Hazards</p>	<p align="center">TARGET 1/2024</p> <p>LPG Loading Arms To be improved the configuration of LPG loading arms and LPG loading truck procedure as per feedback from Authorities: - LPGC Istruttoria Seveso Report. - Audit SGS LPGC recommendation (waiting final report).</p>	<p><i>-Q3/2024 (new configuration and test)</i> <i>-Q4/2024 (Implementation on-site)</i></p>	<p>➤ FOPS Director / Eng&Const Dept. Leader: I. Rea Action: -Procedure updated (1st March 2024). -Risk Assessment for LPG loading arms as per current configuration performed (1st March 2024). Leader: C. Bove Action: -LPG loading arms new configuration to adopt and test. -Implementation on site.</p>
<p>4. Operational Control</p>	<p align="center">TARGET 2/2024</p> <p>Realize a protection of the Nitrogen Cylinder packs located near the U39-Area A- LPG Centre in case they can be impacted by incident scenarios. - LPGC Istruttoria (MEMO 20.12.2023,6.2.2024).</p>	<p align="center">Q1/2024</p>	<p>FOPS Director Leader: I. Rea Reply to the Authorities: to protect the Nitrogen Cylinder packs in case they can be impacted by incident scenarios are available hydrants/monitors in the zone. Possible reply by the Authorities: could require to protected or relocate the Nitrogen Cylinder packs.</p>
<p>4. Operational Control</p>	<p align="center">TARGET 3/2024</p> <p>Inspection campaign for the hoses that connect the hydrants monitor to the foaming liquid tank and for the foam level indicators. - OC Istruttoria (MEMO 16.1.2024, 23.1.2024).</p>	<p align="center">Q3/2024</p>	<p>➤ FOPS Director Leader: I. Rea Action: Inspection Campaign for firefighting systems/equipment and wet test.</p>
<p>4. Operational Control</p>	<p align="center">TARGET 4/2024</p> <p>Fire-Fighting system and equipment Inspection campaign. - OC Istruttoria (MEMO 16.1.2024, 23.1.2024).</p>	<p align="center">Q3/2024</p>	<p>➤ FOPS Director Leader: I. Rea Action: Inspection Campaign for firefighting systems/equipment and wet test.</p>
<p>4. Operational Control</p>	<p align="center">TARGET 5/2024</p> <p>Restore the burial of LPG off-spec and propane tanks. - OC Istruttoria (MEMO 16.1.2024).</p>	<p align="center">Q2/2024</p>	<p>➤ FOPS Director Leader: I. Rea Action: restore the burial and the instrumentations on the roof.</p>

NEW TARGETS 2024

Seveso Element	Activities	Scheduled times	Implementation Leader and Actions
4. Operational Control	<p align="center">TARGET 6/2024</p> Implement the fire visual alarm in Area G1. Verify the activation of toxic visual alarm in Area D. - OC Istruttoria (MEMO 16.1.2024, 23.1.2024).	Q3/2024	➤ FOPS Director Leader: I. Rea Action: test campaign to verify the correct activation of visual alarm in all the OC areas as per C&E Matrix.
4. Operational Control	<p align="center">TARGET 7/2024</p> Implement adequate signage for the area dedicated to the discharge of propane tanks and for areas of compressors (Unit 37, Unit 30-31) - OC Istruttoria (MEMO 16.1.2024).	Q3/2024	➤ FOPS Director / Eng&Const Dept. Leader: I. Rea Action: implement adequate signage.
6. Emergency planning	<p align="center">TARGET 8/2024</p> Campaign for the signalization of Firefighting equipment. - OC Istruttoria (MEMO 23.1.2024).	Q3/2024	➤ FOPS Director / HSE Spdt Leader: I. Rea Action: implement fire equipment signage (e.g., fire extinguisher n.xxx) as reported in the fire system register.
2. Training	<p align="center">TARGET 9/2024</p> Seveso Training to be improved for 3-monthly sessions. - Audit SGS LPGC prescription (waiting final report).	Q4/2024	➤ HSE Direction Leader Leader: A. Muscillo

ATTACHMENT 2 – OIL CENTRE SAFETY ORGANIZATION CHART



¹Presente c/o uffici TotalEnergies di Milano.

²Presente c/o uffici TotalEnergies di Guardia Perticara.

³Presente c/o Centro Olio.

*Responsabile Sicurezza e Ambiente del Centro Olio.

-----> Legami funzionali non gerarchici.