

MAJOR ACCIDENT HAZARDS PREVENTION POLICY

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



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Prepared	Verified	Manager approval
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1 INTRODUCTION

This major accident hazards prevention policy was drawn up by OLT Offshore LNG Toscana S.p.A, the Manager of the Terminal (hereafter OLT) and it defines the general criteria on which the company based its policy concerning major accident hazards associated to the Terminal “**FSRU Toscana**”. It also defines the targets to achieve in order to assure the correct management of safety and environment.

Together with the integrated policy of Quality, Environment, Health, Safety and Social Accountability (HSEQ Policy) this policy defines the main values that company intends to apply to business and to the relationship with community.

In accordance with art. 14 and attachment B of Legislative Decree 105/2015, OLT, together with the SHIPOWNER named in accordance with the Navigation Code (OLT’s outsourcer) to whom the FSRU technical management is assigned, commits itself to adopt and apply this policy to manage and control all the activities that could impact the health of workers and community and to safeguard company itself.

Due to the naval characteristics of the Terminal and the presence of a SHIPOWNER (outsourcer of OLT) to whom the operations maintenance of the Terminal is entrusted, with this policy OLT affirms that the integrated system of the Terminal’s SHIPOWNER (ECOS srl) is in compliance with UNI 10617 and with Legislative Decree 105/15. Furthermore, OLT clearly and carefully keeps a continuous control on the management system activities carried out by Shipowner to prevent the major accident hazards and to safeguard people and environment.

In compliance with current regulations, this policy is applied and kept in force by the company and it is periodically reviewed at least every two years.

2 GENERAL PRINCIPLES

With this policy OLT commits itself to:

- Inform all personnel working in the company or in outsourcing (including the Terminal’s Shipowner) about this policy (major accident hazards prevention policy) and the HSEQ policy making sure that they will be understood and applied;
- Inform the community through the company website about this policy (major accident hazards prevention policy) and the HSEQ policy;
- Apply all the applicable laws, including maritime regulations, to protect safety and environment;
- Promoting a continuous commitment of the employee, as per their tasks and skills, to achieve the company’s objective and to implement the company policies including safety;
- In accordance to the applicable law in force, inform and discuss with the RLS (worker’s safety representative) the safety aspects of competence.

3 GENERAL AND SPECIFIC OBJECTIVES

The main objectives of the company shared with ECOS (the Terminal’s Shipowner) are the following:

- Maintain the compliance of the Management Systems with the applicable law and with the imposed objectives. Furthermore, maintain the compliance with the standards UNI EN ISO 9001, UNI EN ISO 14001, BS OHSAS 18001;
- Maintain the Terminal Management System in compliance with the system regulation of SGS – PIR in accordance with the applicable laws (UNI 10617; Leg. D. 105/15);

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- Keep updated the existing risk assessment as well as the assessment of possible new risks in order to eliminate or if it is not possible, to reduce them. This activity will be carried out focusing in particular on the dangerous substances that may cause a major accident and on keeping constantly updated the Safety Report;
- Constant commitment of the organization as all employees with their tasks and skills will contribute to achieve all the safety objectives;
- Prevent dangerous situation and hazards by eliminating, when it is possible, any dangerous situations assuring that the risk associated to facility operations can be carried out with current knowledge and technologies;
- Minimize the impacts arisen from major accident hazards by correctly and timely applying the prevention measures provided;
- Improve the reliability of our plant and processes using cutting-edge technology equipment and carrying out specific and preventing maintenance to the critical plants;
- Protect the environment and the sea from any kind of pollution by an active environmental responsibility and by continuously promoting the reduction of environmental negative effects.
- Promote inside and outside the company the philosophy of quality, environmental respect, health, safety and social accountability promoting dialogue with the stakeholders to assure sincere and open relationships;
- Increase and improve the personnel experience and knowledge through education, training and awareness at all levels especially in terms of safety;
- Improve the company management organization by clearly defining the levels of responsibility and by improving the personnel participation;
- Monitor continuously the internal and the outsourcing processes by awakening people of all levels to health, safety, environmental and social accountability aspects also including their continuous improvement;
- Improve or maintain the scheduled preventive and corrective maintenance and eventually change parts or device of the plant.

The actions periodically indicated in the annual improvement program are based on specific objectives. These objectives are the base of the major accident hazards prevention improvement program and they are defined in accordance to Manager (OLT) and Shipowner management systems'.

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4 MAJOR ACCIDENT HAZARDS PREVENTION MANAGEMENT SYSTEM (PIR)

4.1 Integration of PIR management system with HSE systems

OLT decided to adopt a Company Integrated Management System to constantly improve its processes, in particular, the quality of service, the environmental aspect management to minimize the environmental impacts, health and safety management and social and ethic accountability.

To implement the above mentioned tasks, OLT adopted an integrated management system based on the requirements provided by the following volunteer standards: **UNI EN ISO 9001, UNI EN ISO 14001, BS OHSAS 18001, and SA 8000**. OLT uses these standards to implement its policy for Quality, Environment, Safety and Social Accountability.

As defined in the Safety Report dated 2015 as in the integrations added in April 2012 to the Safety Report approved, OLT wanted the Terminal Operator ECOS, which is the Terminal's Shipowner, (the main outsourcer of OLT) to adopt **a major accident hazards prevention management system (SGS-PIR) integrated with the volunteer standards UNI EN ISO 9001, UNI EN ISO 14001, BS OHSAS 18001, ISM Code** (which was specifically prescribed by the maritime authority).

4.2 Management system structure

OLT and ECOS management systems are both perfectly suitable for the Terminal "FSRU Toscana" because of its maritime and plant characteristics and in accordance with the major accident hazard risks described in the Safety Report and in the Notification.

The Terminal management system (applied by the outsourcer ECOS) covers all the safety and environmental aspects and it is organized as following:

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

The exact and analytic description of the Terminal Management System can be found in the ECOS's HSEQ Manual which reference is made for details (ECOS-IMS-MAN-001- HSEQ Manual).

The exact and analytic description of the Integrated Management System applied by OLT can be found in the IMSM (Integrated Management System Manual) which reference is made for details.

4.3 System organization

The competences directly in charge of OLT and those in charge of the Terminal Shipowner are described here below to better define the requirements of the Standard UNI 10617:

- Major accident hazards prevention policy: it is in charge of OLT; the Shipowner, as independent company, adopts its own HSEQ policy respecting all the OLT policy principles;
- Organization and personnel: OLT and ECOS, they are both in charge of defining responsibilities, roles and training for their relative personnel and competences. OLT constantly verifies the conformity of the above activities to the regulations in force by carrying out specific audits

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- Hazard identification and Major hazard risk assessment: the major hazard risk assessment is in charge of OLT which uses not only the Shipowner but also other outsourcers to periodically evaluate these risks. This performance is described in the OLT procedures in particular, P4.4.8 "Danger identification and Major Accident Hazard Risk Assessment – Management of change".
- Regulations and other prescriptions arisen from voluntary subscriptions: the identification, management and the implementation of these regulations / prescriptions is in charge of both OLT and Shipowner, each of them as per their competences. In particular, for OLT competences refer to Procedure P4.3.2 "Legal requirements". For ECOS refer to procedure ECOS-IMS-PROC-013-1 Monitoring of Legal Requirements and ECOS-IMS-LIST-008 Mandatory documents list;
- Implementation and organization (Documentation – management and control of documents – operational and maintenance activities control – emergency prevention and mitigation): all the Terminal management activities are assigned to ECOS (Shipowner and Terminal Operator) due to its presence on board the FSRU Toscana. ECOS is also in charge of managing the emergency (having spending power in case of emergency), defining roles and competences organizing the personnel training and the communication to the people going to the plant. The FSRU Manager (OLT) carries out suitable audits to verify that the above mentioned activities are performed in compliance with the regulations in force and with OLT objectives / principles. Furthermore, the FSRU Manager, under its own responsibility, organizes suitable means of communication with community and for planning the external emergency.
- Implementation and organization (management of changes): change proposals are performed by OLT and ECOS but any proposal must be approved by their counterpart. Designing activities (including safety) are jointly performed by OLT and ECOS but they can also use an external company. The changes on the Terminal are performed by external Contractors but the Shipowner holds the responsibility. OLT is in charge to assess the extent of the severity risk and to verify the compliance with Legislative Decree 105/15 (see procedure P4.4.8);
- Check and revision: verification activities are carried out by the FSRU Manager and the Shipowner as per what they concern. OLT periodically schedules the specific audits to carry out on the activities performed by its own outsourcer (as per OLT procedure P4.1.2). OLT, on the occasion of the Management Review, other than company, it considers the activities connected to the Terminal including the Shipowner and Outsourcer performances like the supporting vessels management (tug, guardian vessel, crew boat). See procedures P4.1.2 "Management of outsourcing processes and operational controls" and P 8.2.2 "Audit".

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5 MANAGEMENT SYSTEM IMPROVING PLAN

During the Management Review, OLT evaluates carefully and defines a company implementation plan focused on the continuous improvement of safety, environment, quality and social accountability aspects. In particular, it will be defined and approved not only targets and performance indicators but also company objectives (improvement activities).

The above mentioned improvement activities will be included in the annual company budget whose items of expense, timing and nature of activity are update yearly.

This plan, following the improving principles defined in this policy is an integrant part of this document.