

POLICY FOR THE PREVENTION OF MAJOR ACCIDENTS

Royal Decree 840/2015, of September 21, approving measures to control the risks inherent in serious accidents involving dangerous substances.

TABLE OF CONTENTS

1. INTRODUCTION
2. BASIC PRINCIPLES
 - a. Organization and Personnel
 - b. Risk Management
 - c. Operational Control
 - d. Continuous Adaptation
 - e. Emergency Planning
 - f. Monitoring of Set Objectives
 - g. Audit and Review
3. ANNEX

| Version | Date | Responsible for version/modification | Approved by | Date |
|---------|------------|--------------------------------------|---|------|
| 2 | 12/11/2023 | Prevention, Environment, and Quality | Directorate-General for Strategy and Sustainability | " " |



| CHANGES FROM LAST VERSION | | |
|---------------------------|-------------------|-----------------------------------|
| Edition - Date | Sections affected | Reason for change |
| 1 – 10/11/2017 | ALL | Prepared by PPAG Nortegas Energía |
| 2 – 12/11/2023 | ALL | Periodic review |

1. INTRODUCTION

NORTEGAS, in application of "R.D. 840 of 2015 of September 21, which approves measures to control the risks inherent in serious accidents involving dangerous substances" (commonly known as the SEVESO regulation), owns establishments or facilities included within its scope.

This document covers and reflects the general objectives and principles of action established by **NORTEGAS** in relation to the identification, assessment, and control of major accident hazards, in order to ensure a high level of protection for the health of workers, the environment, and property, through appropriate means, structures, and management systems.

For all these reasons, **NORTEGAS** management, as the body responsible for the prevention of serious accidents and concerned both with the protection of workers and with the continuous improvement of its management results and the protection of the environment and surroundings, is committed to a continuous effort to identify, eliminate, and/or control, through the active participation of all staff, risks that could cause damage to people and facilities and/or cause unwanted interruptions in the production process, with special attention to those risks that could result in serious accidents.

It is hereby stated that this Major Accident Prevention Policy:

- It is appropriate for the purpose of the organization and the activity it carries out.
- It will be updated periodically in accordance with technical progress and changes in legislation.
- It shall be made known to all levels of the organization.
- It is consistent with the risks of serious accidents that may occur at the establishment.
- It provides a reference framework for establishing and reviewing the objectives set.
- It is consistent with the policies defined within the organization.

Likewise, in developing this Policy, NORTEGAS Management undertakes to:

- The creation of a positive culture that ensures participation, commitment, and information at all levels, in order to motivate staff to contribute to the necessary efforts in the area of Health and Safety.
- A firm commitment to complying with current legislation on the prevention of serious accidents.

2. BASIC PRINCIPLES

a. Organization and Personnel

All accidents and incidents can be prevented, and management is firmly committed to making every effort necessary to achieve this goal.

It is the responsibility of all personnel to comply with and enforce safety guidelines for the prevention of serious accidents, committing to manage and carry out all activities in a safe and responsible manner, through the application of internal procedures and good practice to prevent and avoid negatively impacting the health and safety of people and the safety of facilities.

Promote the participation of all workers and stakeholders, who are important from a safety perspective.

Collaborate with different administrations and public and private entities in risk prevention and the improvement of safety conditions in particular, ensuring the implementation of mechanisms for notification, investigation, and implementation of appropriate measures and communication in the event of an incident or serious accident.

b. Risk Management

Establish a methodology for identifying, assessing, and managing the potential risks of causing serious accidents arising from the activities carried out by NORTEGAS, including subcontracted activities, processes, and equipment. All activities will be managed and carried out safely, effectively, and responsibly, in accordance with the Occupational Health and Safety and Serious Accident Prevention Policies (PPAG) required by current legislation and best practices in the sector.

Serious Accident Prevention (PPAG) required by current legislation and best practices in the sector.

Investigate and report near misses and serious accidents, as well as carry out safety observations and inspections, in order to verify compliance with work standards and procedures, assess potential risk situations, and identify areas for improvement. The results of these will be used as an important criterion for evaluating the company's management, promoting its continuous improvement.

c. Operational Control

Management assumes as one of its obligations the operation of the facilities under proper safety conditions, especially considering the risk of serious accidents.

The necessary procedures and instructions are established to ensure the safe design and operation of facilities, processes, equipment, and temporary shutdowns. The necessary work practices are determined for all activities that are important in terms of safety.

When determining procedures, instructions, and work methods, cooperation between the people who must carry them out is taken into account, expressing them in a way that is easily understandable by them and ensuring that they are put into practice.

The written procedures are available to all **NORTEGAS** personnel **and** are periodically evaluated to ensure their effectiveness.

d. Continuous adaptation

Comply with the legislation applicable to the various facilities, operations, and systems, as well as other requirements to which the organization subscribes, new legislation, and business criteria.

Any new implementation or modification of existing facilities will be analyzed in detail from a safety perspective to ensure that it complies with the provisions of the applicable legislation and regulations.

Manage change, develop the necessary procedures for planning and controlling changes affecting establishments or facilities, taking into account external circumstances that may affect the control of major accident hazards.

These change management procedures will be taken into account during the design and construction of new facilities or processes.

e. Planning for emergency situations

Plan for emergency situations by adopting and implementing Internal Emergency Plans designed to identify them. These plans will be subject to the necessary periodic reviews, whether legal or not, with the aim of achieving maximum operability and safety.

Plan regular training sessions and practical exercises or drills, including personnel from partner companies and self-employed personnel, to test the degree of effectiveness in the event of possible critical situations.

In general, this includes measures that ensure the integration of the emergency plan into the organizational structure of the establishment, which affects the processes and overall content of the management system.

f. Monitoring of the objectives set

Propose Occupational Health and Safety Strategies and Objectives on an annual basis that can be evaluated, defining the actions necessary to achieve these objectives. **NORTEGAS** management approves the proposed strategies and objectives based on the results obtained and ensures compliance with the objectives set for the control of serious accident risks.

g. Audit and Review

Continuous improvement. NORTEGAS uses independent and objective auditing processes to ensure that the established processes and procedures are adequate. This verifies that the prevention management system is appropriate for complying with the established policy and objectives or, if the results show that changes may be necessary.

Review: NORTEGAS will periodically review and evaluate this Major Accident Prevention Policy in order to consider the general objectives and principles of action established at its facilities in relation to the control of major accident risks, with a view to ensuring maximum safety at its facilities.

3. ANNEX

This includes a list of establishments or facilities owned by NORTEGAS Energía that fall within the scope of Royal Decree 840/2015, of September 21, which approves measures to control the risks inherent in major accidents involving dangerous substances, to which the Major Accident Prevention Policy defined in this document applies.