

APPROVED
by Order of RusChemAlliance LLC
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REGULATION
on Industrial Safety Compliance Monitoring of
RusChemAlliance LLC

St. Petersburg

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1. GENERAL PROVISIONS

1.1. The Regulation on monitoring compliance with the industrial safety requirements of RusChemAlliance LLC (hereinafter – the Regulation) has been developed in order to define common provisions for organizing and monitoring compliance with the Health, Industrial and Fire Safety requirements (hereinafter – industrial safety) at RusChemAlliance LLC (hereinafter – Owner).

1.2. Monitoring Compliance with Industrial Safety Requirements (hereinafter – MCISR) includes:

- occupational health supervision including Work Environment monitoring as well as work management;
- fire safety monitoring;
- industrial safety monitoring.

1.3. MCISR is one of the components that comprises the total complex of organizational and technical measures aimed at establishing the Owner Industrial Safety Control System (hereinafter – ISCS).

1.4. MCISR is carried out with regard to all Contract (Subcontract) organizations that take part in construction project “Gas Processing Complex within Ust-Luga ethane-rich gas processing cluster” (hereinafter – Project, GPC ERGPC) that carry out works directly at the GPC ERGPC construction site.

1.5. The Regulation does not regulate the procedure for auditing in terms of Occupational Health and Safety Management System audit.

1.6. MCISR is carried out in order to prevent possible accidents, as well as to obtain, in accordance with the Regulation, information and evaluation of the Owner’s activities effectiveness in industrial risk management before accidents, occupational diseases, emergencies, incidents, fires have actually occurred.

1.7. The Regulation is mandatory to be met by contractors (subcontractors) that participate in the Project implementation, Third-Party organizations interacting with the Owner, the Owner’s Group employees.

2. REFERENCES TO REGULATORY ACTS

The Regulation has been developed in accordance with the Russian Federation normative and legal acts requirements as well as current versions of Owner’s local normative acts including but not limited to:

- Regulation for Interface Between the Parties on Health, Industrial and Fire Safety, and Environmental Issues;
- Health, industrial and fire safety policy;
- List of legislative and other regulatory documents containing requirements on Health, Industrial and Fire Safety, civil defense and emergency safety applicable to the Owner’s activities.

3. TERMS, DEFINITIONS, DESIGNATIONS AND ABBREVIATIONS

3.1. The following terms, definitions are used in the Regulation:

- **Comprehensive audit** – an audit carried out by the Industrial Safety Group employees in accordance with the Regulation;
- **Agreement** – an agreement between two or more parties under which the Contractor undertakes, according to the Owner instructions, to render services (perform certain actions or activities) and the Owner undertakes to pay for these services;
- **Corrective actions** – actions taken to eliminate the cause of detected nonconformities with industrial safety requirements, ISCS;

– **Contract Administrator** – Owner structural unit responsible for timely Contract preparation, its approval and signature by the Owner and Contractor and proper execution of obligations under the Contract;

– **Nonconformity with the industrial safety requirements** – derogation from the legislative industrial safety requirements as well as from the ISCS requirements;

– **Hazardous occurrence** – an incident that can harm a person in a form of injury or deterioration of health;

– **Contractor** – a person or an organization who performs works, provides services or supplies products to the Owner on a contractual basis, including EPC Contractors;

– **Industrial safety** – the state of protection of fixed assets, Owner employees as well as the third parties (including their property) and the environment against negative factors, accidents, harmful and dangerous occupational factors;

– **Accident** – shall mean any undesirable event occurred that resulted or could have resulted in a damage to employee health at the production facility, an accident, incident or fire;

– **Subcontractor** – a person or an organization who performs works, provides services or supplies products on a contractual basis with the Contractor;

– **Target audit** – an audit implemented by the Industrial Safety Group or a person to monitor the execution of Industrial Safety Requirements (the Industrial Safety Requirements for a target audit are established according to the Regulation);

– **Owner** – RusChemAlliance LLC.

3.2. The following abbreviations are used in the Regulation:

– **EPC-Contractor** – an organization that implements a Work and Service Package on engineering, procurement, construction, assembly, other works according to the Contract;

– **CA** – Corrective actions;

– **HSE** – occupational health, industrial and fire safety and environmental protection;

– **PPE** – safety clothes, safety footwear and other personal protective equipment;

– **ISG** – Owner Industrial Safety Group;

– **SU** – Structural Units;

– **GPP and UIO Subproject** – Subproject of “Gas Processing Plant and Utilities, Infrastructure and Offsites” Project;

– **HSE Group at GPP and UIO ED** – Health, Industrial Safety and Environmental Protection Group at Owner GPP and UIO Engineering Division.

4. MCISR LEVELS

4.1. Coordination of Owner SU activities on HSE problems and Owner Officials involved in planning, maintaining and implementation of MCISR is imposed on Owner Chief Engineer – First Deputy Director.

4.2. The Owner MCISR is implemented in 3 (three) levels:

I level – at I level the MCISR is implemented by the Subcontractor Officials and SU appointed to be responsible for compliance with the industrial safety requirements.

II level – at II level the MCISR is implemented by the Contractor Officials and SU appointed to be responsible for compliance with the industrial safety requirements with participation from GPP and UIO Subproject of HSE Group at Subproject GPP and UIO ED.

III level – at III level the MCISR is implemented by ISG jointly with HSE Group at GPP and UIO ED.

The Diagram of MCISR Structure is presented in Attachment No. 1.

4.3. The Subcontractor/Contractor Officials responsible for MCISR implementation shall ensure provision of weekly reporting on implemented MCISR or upon request of Owner Chief Engineer – First Deputy General Director, ISG Head.

4.4. The Owner Chief Engineer – First Deputy General Director shall be responsible for MCISR functioning.

5. PROCEDURE FOR MCISR FORMATION

5.1. MCISR I level participants are Subcontractor Officials appointed to be responsible for compliance with the industrial safety requirements, as well as each Subcontractor employee performing compliance audit with the industrial safety requirements at his designated workplace.

5.2. MCISR II level participants are:

- representatives of HSE at GPP and UIO Subproject ED of GPP and UIO Subproject;
- Contractor Officials according to the scope of works performed designated to be responsible for compliance with industrial safety requirements.

The Owner has right to involve a specialized organization to monitor the compliance with the industrial requirements by Contractors and Subcontractors at GPC ERGPC construction site.

5.3. MCISR III level participants are:

- ISG employees involving HSE representatives at GPP and UIO ED when implementing audits for the GPP and UIO Subproject.

6. MCISR I LEVEL PREPARATION AND IMPLEMENTATION

6.1. Each Subcontractor employee shall check compliance with the industrial safety requirements at his designated workplace. The Subcontractor employee shall start his work with examination of his workplace to check it for compliance with regulatory documents requirements on industrial safety and if violations are detected, the employee shall take measures to eliminate them and shall start working after all violations are eliminated. The employee shall report about violations to his immediate supervisor, shift supervisor, crew head, tour supervisor.

6.2. At the I level MCISR is performed by the Subcontractor Officials.

6.3. According to the MCISR results the following documents shall be drawn:

- Acts (Attachment No. 2);
- Reports on elimination of violations detected during audit (Attachment No. 3).

6.4. The Subcontractor shall organize works for nonconformities elimination.

6.5. Prior to commencement of works by the Subcontractor within the limits of MCISR II level, the work operations shall be reviewed by the Contractor in accordance with the checklist (Attachment No. 4) containing a list of main issues to be checked for compliance with industrial safety requirements (hereinafter – the Checklist). If necessary, the criteria can be revised by the Owner with corresponding changes in the Checklist.

6.6. To monitor elimination of violations identified in the course of MCISR, the Register of Detected Violations shall be kept (Attachment No. 5).

6.7. The Acts, Reports, Registers of Detected Violations shall be sent to the Contractor's address by the Subcontractor industrial safety specialists to approve the nonconformities elimination.

6.8. The Contractor shall send the revised reports to the Owner ISG address at least once every 7 (seven) calendar days.

7. MCISR II LEVEL PREPARATION AND IMPLEMENTATION

7.1. At the II level MCISR is performed by the Contractor jointly with representatives of HSE at GPP and UIO ED when implementing audits for the GPP and UIO Subproject.

7.2. At the II level MCISR is performed at least once every 7 (seven) calendar days at the GPP ERGPC construction site.

7.3. The Contractor shall organize works for nonconformities elimination identified in the course of I level MCISR.

7.4. According to the MCISR results the following documents shall be drawn:

- acts (Attachment No. 2);
- reports on elimination of violations detected during audits (Attachment No. 3).

7.5. To monitor elimination of violations identified in the course of MCISR, the Register of Detected Violations shall be kept (Attachment No. 5).

7.6. The Acts, Reports, Registers of Detected Violations shall be sent by the Contractor's representatives to the Owner ISG at least once every 7 (seven) calendar days to the e-mail address hse@baltlng.ru.

8. MCISR III LEVEL PREPARATION AND IMPLEMENTATION

8.1. III level MCISR scheduling shall be formalized every year by December 25 of the year previous to the scheduled one in a form of a Schedule for joint audits of ecological, industrial, fire and health safety at the GPP ERGPC construction sites implemented by the Owner (Attachment No. 6).

8.2. The Schedule shall be approved by the Owner Chief Engineer – First Deputy General Director and for the purpose of informing and works planning, it shall be brought to knowledge of the I and II MCISR levels participants by an official letter.

8.3. All the Contractors and Subcontractors involved in implementation of the I and II levels MCISR shall be audited during the year.

8.4. III level MCISR participants shall implement the comprehensive audit according to the approved Schedule in the presence of their executive heads (or their substitutes) as well as employees of Owner, Contractor/Subcontractor SUs to be audited.

8.5. Having detected during a comprehensive audit of the MCISR at III level the facts of unsatisfactory implementation of the MCISR at the I, II levels, among others the facts of repeated or unresolved nonconformities with the requirements of industrial safety within the due date, the III level MCISR participant shall send a memo to the address of the Legal Division and the SU that is Administrator under the contract indicating the facts of defective performance (non-performance) of industrial safety requirements by Contractors/Subcontractors.

8.6. According to the results of the III level MCISR comprehensive audit the Comprehensive Audit Act shall be drawn by the Chairman of the III level MCISR on the last MCISR audit day at the III level of the structural unit (Attachment No. 2). The Comprehensive Audit Act shall be sent within 5 business days by an official letter to the Contractor/Subcontractor, which was inspected, as well as to the SU that is a Contract Administrator.

8.7. In order to monitor elimination of violations identified during MCISR, the Register of Detected Violations within the limits of MCISR III level shall be kept (Attachment No. 5).

8.8. The original Comprehensive Audit Act of the III level MCISR shall be kept in ISG according to Owner File Register.

9. CLAIM WORK

9.1. Penalties for non-performance of industrial safety requirements shall be applied in accordance with the terms of agreements (contracts) concluded with the Contractor. This mechanism pertains to the Owner internal procedures on industrial safety, and violations of any requirement specified in this document shall be qualified in accordance with the List of Penalties for a Specific Agreement (Contract).

9.2. The Act issued in accordance with Attachment No. 2 is the document certifying registration of violations. The following procedures shall be established by the Owner Regulation on Claim Related Work.

9.3. ISG shall send the Comprehensive Audit Acts to the Contract Administrator as well as to the Owner Legal Division for Claim Related Work to be initiated by the Contract Administrator.

10. ORGANIZATION AND IMPLEMENTATION OF TARGET AUDITS

10.1. The target audits of conformity with the industrial safety requirements (hereinafter –

target audits) shall be carried out by the Owner ISG employees involving HSE Group at GPP and UIO ED of GPP and UIO Subproject.

10.2. The periods for performance, scopes and objects of target audits shall be established by the Owner Administrative Document considering the following:

- state of industrial safety including the level and dynamics of accident rate and workplace injuries rate at GPP ERGPC construction site during the period from the last comprehensive audit date;

- late elimination of previously identified nonconformities, as well as late implementation of orders issued by federal supervision and corporate regulatory authorities following the results of reports submitted in accordance with the Regulation;

- modifications of industrial safety regulatory requirements at Federal and corporate levels;

- organizational and technological changes in Owner structural units to be audited;

- instructions from PJSC Gazprom, JSC RusGazDobycha.

10.3. The target audits shall be documented as follows by:

- Act (Attachment No. 2) within 3 (three) business days;

- Order for Suspension of Works (Attachment No.7) if the nonconformity with industrial safety requirements has been detected, or the work has been carried out with violations of industrial safety requirements that are dangerous for the life and health of employees and (or) may result in an accident, incident, fire, road traffic accident, – immediately until the identified nonconformities with industrial safety requirements are eliminated.

11. REQUIREMENTS FOR CORRECTIVE ACTIONS PLAN DEVELOPMENT BASED ON MCISR RESULTS

11.1. If the developed CA identify new hazards and need for new or modified management measures, then the proposed actions shall be performed after the risk for life and health of workers is assessed.

11.2. In developing corrective actions for each identified nonconformity, the reasons for the nonconformity should be established on the basis of:

- analysis by the developer of CA documents (instructions, rules, regulations, regulatory and administrative documents, Schedules, etc.) that regulate the process with identified nonconformity;

- correction analysis of similar nonconformities previously identified during MCISR;

- results of inquiries by CA developer of the persons who had committed nonconformities.

11.3. Methods for analysis of root causes can be used to identify the nonconformity causes.

12. CONTRACTOR / SUBCONTRACTOR REPORTING

12.1. The Contractor shall send the Report to the Owner's e-mail: "hse@baltlng.ru" monthly (or upon request). The Report shall comprise the following information:

- number of audits carried out for conformity with industrial safety requirements;

- number of identified and eliminated violations of industrial safety requirements provided by Russian Federation legislation;

- information about targeted meetings organized to resolve the industrial safety problems, preventive measures, practical training activities as well as verification audits;

- status of incidents at the Project construction sites (rapid incident report is to be sent no later than two (2) hours after a dangerous event has occurred according to the Attachment No. 8);

- Summary report on conformity with the Environmental and Social Management Framework Plan and with Construction Management Plans (Attachment No. 12);

- Report on elimination of violations detected during audits;

- Industrial Safety and Environmental Protection Report (Attachment No. 9);

- HSE Incidents Register (Attachment No. 10);

- Monitoring Report on Environmental and Social Aspects of Project Implementation (Attachment No. 11).

12.2. The quarterly report includes the section on HSE containing the following:

- Monitoring Report on Environmental and Social Aspects of Project Implementation;
- Summary report on conformity with the Environmental and Social Management Framework Plan and with Construction Management Plans (Attachment No. 12).

Diagram for MCISR while implementing GPC ECGPC Construction Project

Subcontractor

I Level

Employee

- Prepares and arranges Personal Protective Equipment, protective footwear and other personnel protective means
- Inspects the workplace and equipment to be used
- Checks the workplace lighting
- Before starting work studies the operating manuals for equipment to be used

Engineering and technical personnel

Specialists on occupational health, industrial and fire safety

- Admission of workers to independent work
- Monitoring for compliance with Health and Industrial and Fire Safety Requirements

II Level

Contractor (EPC-Contractor)

Health, Safety and Environment Protection Group at GPP and UIO Engineering Division of RusChemAlliance LLC

- Admission of Subcontractor to perform works at the area of Project implementation
- Monitoring for compliance with Health and Industrial and Fire Safety Requirements

III Level

RusChemAlliance LLC Industrial Safety Group

Health, Safety and Environment Protection Group at GPP and UIO Engineering Division of RusChemAlliance LLC for GPP and UIO Subproject

- Monitoring for compliance with Health and Industrial and Fire Safety Requirements of EPC-Contractor for GPP and UIO Subproject

- Surveillance audit of compliance with Health and Industrial and Fire Safety Requirements
- Contractor methodology for Industrial Safety Control System formation

RusChemAlliance Limited Liability Company
(RusChemAlliance LLC)

**Certificate on detected violation
of the Russian Federation Legislation and other Local Normative Legal Acts
applied to Health, Industrial and Fire Safety and Environment Protection
(Form)**

No. _____ DATED _____ 20____

I have (the following Commission members have)

(full name, position)
witnessed _____ by _____
(full name, position of persons who witnessed the certificate issue)

made a Certificate confirming that the organization or its employee _____
(organization, full name, position, etc.)
committed the following violation:

Item No.	Identified violations	Clause of regulatory documents	Date of elimination
1	2	3	4

Position _____ of _____ auditor:

(signature, full name, date and time)

I have read and understood the Certificate and received its copy

(signature of the employee, full name, date)

Appendix: supporting documents, photos

Report on elimination of violations detected during audit
 No. _____ DATED _____ 20____
 (FORM)

Certificate Clause No.	Identified violations	Clause of regulatory documents	Cause of nonconformity	Content of corrective measures (correction)	Person responsible for correction	Deadline period established by the Certificate	Actual date of violation elimination	Reasons for not complying with the deadline	Certifying documents
1	2	3	4	5	6	7	8	9	10

Position of the person who drew up the report: _____
 (signature, full name, date and time)

Appendix: supporting documents, photos

**Check-list of Contractor Compliance
with Health, Industrial and Fire Safety and Environment Protection
Requirements
(Form)**

Name of the Contractor: _____

Name of the Subcontractor: _____

Planned activities: _____

Work area: _____

Period: from _____ to _____

Item No.	Questions	Yes / No / Not Applicable
1.	List of general questions on industrial safety	
1.1.	Contractor personnel have undertaken preliminary medical examination that showed no contraindications and they have a permit for independent work within their area of qualification	
1.2.	Contractor personnel have respective qualification, undertaken training in occupational safety, and knowledge test in occupational safety, fire safety, environmental protection, certification in industrial safety, training in first aid in a production environment	
1.3.	Contractor personnel involved in work performance have read and understood the instructions in occupational safety, industrial and fire safety, emergency actions and environmental protection as well as production instructions	
1.4.	Contractor personnel have been made aware of the emergency procedure, emergency service phone numbers, locations of first aid stations, first aid kits, emergency firefighting equipment	
1.5.	Work site limits and hazardous site limits are designated	
1.6.	Personnel are provided with all necessary PPE including respiratory and ocular PPE	
2.	Performing works of high hazard	
2.1.	Work permit procedure for working at height is arranged	
2.2.	Involved personnel are equipped with respective PPE for working at height	
2.3.	Work permit procedure for works with electrical installations is arranged	
2.4.	Personnel are equipped with PPE for electric shock protection	
2.5.	Work permit procedure for earthworks is arranged	
2.6.	Adequate safety distance is provided from the equipment and mechanisms located in close proximity to trenches and excavations	

Item No.	Questions	Yes / No / Not Applicable
2.7.	Work permit procedure for working in proximity of PTL (power transmission lines) is arranged	
3.	Installation of steel structures	
3.1.	Capacity of used hoisting equipment (HE) complies with established requirements	
3.2.	Measures are defined for using several HE items	
3.3.	Drivers (operators) have a license to drive (operate) HE	
3.4.	Technical condition assessment of HE is implemented in proper time (partial technical examination, full technical examination)	
3.5.	HE is equipped with plates indicating its registration number, serial number, rated capacity and dates of next full or partial technical examination	
3.6.	Installation of used HE on the site comply with the requirements (according to the Method Statement (MS): hard and even coating that can perceive the maximum design load from HE with cargo: with a slope not exceeding 5° towards the external outline of the site, etc.)	
3.7.	Works using HE shall be implemented in accordance with the MS and process flow diagrams developed by the operating or special organization	
3.8.	Responsible personnel have been designated (copies of orders): - for production monitoring during HE operation; - for HE maintenance in operable condition; - for safe work performance using HE	
3.9.	An acknowledgement sheet is available confirming that engineering and technical personnel responsible for production monitoring during HE operation, HE maintenance in operable condition and safe work performance using HE, driving operators, sling operators, etc. have been made aware of the method statement and process flow diagrams	
3.10.	Fences are provided along hazardous zone limits where HE is in operation	
3.11.	HE log is available	
3.12.	Capacity of used handling devices (HD) complies with established requirements	
3.13.	Timely inspections of HDs and ensuring their operability	
3.14.	Technical logbook and inspection log for LHG (Loose Hoisting Gear) is available	
3.15.	Availability of a Certificate for independent work on respective activities, issued in accordance with the procedure established by the operating organization	
3.16.	Sling operators have special distinctive signs (clothes)	
4.	Using hoists, jacks, labor saving tools	
4.1.	Operability, inspection, issue, repair and operation procedures are ensured	
5.	Using hazardous substances and materials	
5.1.	Safe storage and transportation of equipment and materials are organized	
5.2.	Safe accumulation, handling, marking, disposal of residual hazardous substances and materials are ensured	

Item No.	Questions	Yes / No / Not Applicable
5.3.	Instructions are developed and PPE is provided for working with hazardous substances and materials	
6.	Using manual pneumatic and electrical tools	
6.1.	Accounting, inspection, issue, repair, operability monitoring procedures are organized	
7.	Using welding machines and equipment operated with natural fuel	
7.1.	Ensuring operability and procedures for inspection, issue and repair	
7.2.	Persons responsible for safe maintenance of equipment and tools are designated	
7.3.	Safe connection and energy draw-off is arranged	
7.4.	Safety gaps and protection against high heat radiation are ensured	
8.	Works inside vessels, confined circuits (indoor), zones with possible sources of gas emissions	
8.1.	Work permit for gas hazardous works is arranged	
8.2.	Personnel are provided with intrinsically safe tools and equipment	
9.	Fire safety	
9.1.	Personnel have read fire safety instructions, know how to act in case of fire and are aware of firefighting equipment locations	
9.2.	Maintenance regulations for fire protection systems are available and followed, an operation log for fire protection systems is kept	
9.3.	Emergency firefighting equipment is available and operable	
9.4.	Fire safety requirements to storage of substances and materials are followed	
9.5.	Requirements to fire safety gaps are followed	
9.6.	Fire protection systems and self-contained fire detectors are available and operable	
9.7.	Compliance with requirements in organization of permanent places for hot works	
9.8.	Informational signs of fire safety are available and operable	
9.9.	Compliance with requirements to organization and performance of gas hazardous and hot works	
10.	List of questions on environmental safety	
10.1.	Environmental management system is available	
10.2.	Public registration of objects with negative environmental impacts (Art. 69.2 of the Federal Law dated 10.01.2002 No. 7-FZ On environmental protection (hereinafter — Law No. 7-FZ))	
10.3.	Training in environmental protection and environmental safety of supervisors and specialists responsible for taking decisions during business and other activities that have or can have a negative environmental impact (Art. 73 Law No. 7-FZ)	

Item No.	Questions	Yes / No / Not Applicable
10.4.	Making a duly payment for a negative environmental impact (Art. 16.4 of the Federal Law dated 10.01.2002 No. 7-FZ On Environmental Protection (hereinafter — Law No. 7-FZ))	
10.5.	Submitting in accordance with the established procedures a Declaration on payment for negative impact on environment (pars. 2, 5 Art. 16.4 of the Law No. 7-FZ)	
10.6.	Approved Production Environmental Monitoring Program is available (Art. 67 of the Law No. 7-FZ)	
10.7.	Implementation of production environmental monitoring in accordance with the Production Environmental Monitoring Program, documentation and storage of valid data obtained through production environmental monitoring (Art. 67 of the Law No. 7-FZ)	
10.8.	Providing a report on organization and results of environmental monitoring in accordance with the established procedure (Order of the RF Ministry of Natural Resources and Environment dated 28.02.2018 No. 74)	
10.9.	License for collection, transportation, processing, disposal, decontamination, dumping of I–IV hazard class wastes during the specified activities is available (Art. 9 of the Federal Law On Production and Consumption Waste dated 24.06.1998 No. 89-FZ (hereinafter — Law No. 89-FZ); Art. 12 of the Federal Law dated 04.05.2011 No. 99-FZ On Licensing of Certain Types of Activities)	
10.10.	Persons admitted to collect, transport, process, dispose, decontaminate, dump I–IV hazard class wastes possess qualification documents issued after professional training or further vocational education necessary to work with I–IV hazard class wastes (Art. 15 of the Law No. 89-FZ)	
10.11.	Drivers who transport hazardous cargoes (wastes) possess certificates of training for drivers transporting such cargoes (Certificate for Transport by Road of Dangerous Goods (DOPOG Certificate)) (Art. No. 31 of the Federal Law dated 08.11.2007 No. 257-FZ)	
10.12.	Transportation of waste by specially equipped and marked with warning signs vehicles with waste data sheets and documents for waste transportation and transfer attached indicating quantity of transported waste, purpose and destination of transportation (Art. 16 of the Law No. 89-FZ)	
10.13.	Removal of metal scrap to organizations having a license for preparing, processing and selling scrap of ferrous/non-ferrous metals (RF Government Decree dated 11.05.2001 No. 369, RF Government Decree dated 11.05.2001 No. 370)	
10.14.	Agreement with a regional operator for handling solid municipal wastes (Art. 24.6 of the Law No. 89-FZ)	
10.15.	Agreement with an operator for handling hazard class I and II wastes (Art. 14.1 of the Law 89-FZ)	
10.16.	Keeping records in the field of waste disposal (Order of the RF Ministry of Natural Resources and Environment dated 08.12.2020 No. 1028)	
10.17.	Transfer and Acceptance Statement for wastes and primary accounting documents (waybills) are available confirming that wastes are transferred to licensed/specialized organizations for waste handling (Law No. 89-FZ)	
10.18.	Accumulation of wastes in organized places (areas) of waste accumulation (Art. 13.4 of the Law No. 89-FZ)	

Item No.	Questions	Yes / No / Not Applicable
10.19.	Disposing of wastes exclusively at waste disposal facilities listed in the State Waste Disposal Register (Art. 12 of the Law No. 89-FZ)	
10.20.	Compliance with the prohibition on wastes disposal that comprise useful components to be recycled (Art. 12 of the Law No. 89-FZ; RF Government Resolution dated 25.07.2017 No. 1589-r)	
10.21.	Compliance with the prohibition to discharge production and consumption wastes into surface and underground water bodies, to catchment areas, into the subsurface, on soil (Art. 51 of the Law No. 7-FZ)	
10.22.	Classifying respective wastes by certain hazard class (Art. 14 of the Law No. 89-FZ)	
10.23.	Data sheets for wastes of hazard classes I–IV are available (Art. 14 of the Law No. 89-FZ, Order of the RF Ministry of Natural Resources and Environment dated 08.12.2020 No. 1026)	
10.24.	Providing statistical reporting on waste handling (Art. 19 of the Law No. 89-FZ)	
10.25.	Compliance with water protection zones and protected shoreline belts (Art. 65 of the RF Water Code)	
10.26.	Using a water body based on a decision to provide the water body for use (Art. 11 of the RF Water Code)	
10.27.	Compliance by the water user with terms of a decision to provide a water body for use (Art. 22 of the RF Water Code)	
10.28.	Respect of a prohibition during water management system use to discharge waste water into the water body if such water is not treated, not neutralized (Art. 60 of the RF Water Code)	
10.29.	Providing statistical reporting on atmospheric air protection (Order of the Federal State Statistics Service dated 08.11.2018 No. 661)	
10.30.	An action sheet is available for decreasing contaminant emissions to the atmospheric air during adverse weather conditions (Order of the RF Ministry of Natural Resources and Environment dated 28.11.2019 No. 811)	

- The checklist can be updated by decision of the head of ISG when issuing administrative documents of the Company as to industrial safety.

The Contractor (complies / does not comply) with safety requirements according to the evaluation based on the check list.

Representative of _____
 RusChemAlliance LLC: (signature) (Full name)

EPC/C Contractor's _____
 representative: (signature) (Full name)

Attachment No. 6
to Regulation on Industrial Safety
Compliance Monitoring of
RusChemAlliance LLC

APPROVED BY
Chief Engineer — First Deputy General
Director

“ _____ ” _____ 20 _____

SCHEDULE
for Health, Industrial and Fire Safety and Environment Protection
Joint Audits at Construction Sites of Gas Processing Complex within Ust-Luga Ethane-Rich
Gas Processing Cluster¹
for _____ (year)

Item No.	Month²	Scope of audit²
1		All Contractors
2		All Contractors
3		All Contractors
4		All Contractors

Head of Environmental
Protection Group

Head of Industrial
Safety Group

Head of
Integrated Management System Group

¹ The Schedule has been developed to monitor compliance with the Environmental and Social Management Framework Plan at the Construction Phase and Construction Management Plans.
According to the Regulations on Quality Control of Construction implemented by the General Contractors at Gazprom OJSC facilities and approved by the Deputy Chairman of the Management Committee of Gazprom OJSC V.A. Markelov dated 11.06.2014.

² Specific periods and scopes of audits shall be established by specialists independently in the course of interaction between RusChemAlliance LLC and the Contractor.

(FORM)

ORDER FOR SUSPENSION OF WORKS

_____ 20____

No. _____

(issued to: position, surname)

I, _____

(position, full name of auditor)

(day, month, year)

have audited and identified _____

(indicate the audited objects: work performance or equipment operation, etc.)

the following nonconformities with the industrial safety requirements:

The following identified nonconformities with safety requirements need to be corrected _____

(indicate hour, day, month, year, name of the object and/or works)

Chief Engineer — First Deputy General Director has been informed:

(date, hour)

Order has been issued by: _____

(surname. signature, date)

Order has been received by: _____

(surname. signature, date)

The works can be resumed after correction of the nonconformities indicated above with permission of: _____

(position, full name)

Order has been issued by: _____

(signature, date)

Order has been received by: _____

(signature, date)

Checked: all the nonconformities with the industrial safety requirements have been eliminated:

(specify corrective activities)

Work performance is permitted from: _____ hour _____ minutes _____
(day, month, year)

(position, full name)

RAPID INCIDENT REPORT

(shall be provided in a period as per matrix)

Company					
Incident location:					
GENERAL INFORMATION					
Incident date			Time of incident occurrence		
Incident category					
Related to production					
Incident classification					
Medical treatment (microtrauma)					
Information about injured persons					
Casualty toll			among them:		
1	Company employees				
1	Contractors	Name of Contractor company			
0	Third parties				
Injured person's full name		Date of birth	Position (speciality)	Injured body part	Work being carried out at the moment of incident
Description of incident circumstances					
Measures taken					
Report has been made by:					
Position		Full name	Contact information Tel./E-mail	Date	

Planned/implemented measures (format SMART)*

Planned measures for next month

Item No.	Measures	Result	Period
Occupational health safety:			
Health protection:			
Industrial and Transport safety:			
Fire safety, civil defense and emergencies:			
Environmental protection:			
Other measures (staff, cooperation with occupational health officers, trade union, etc.):			

Measures implemented in the reporting month

Item No.	Measures	Result	Period
Occupational safety:			
Health protection:			
Industrial and Transport safety:			
Fire safety, civil defense and emergencies:			
Environmental protection:			
Other measures (staff, cooperation with occupational safety officers, trade union, etc.):			

* — Format SMART — Specific, Measurable, Attainable, Relevant, Time-bound.

**MONITORING REPORT
ON ENVIRONMENTAL AND SOCIAL ASPECTS OF PROJECT IMPLEMENTATION**

(form)

RUSCHEMALLIANCE LLC
Gas Processing Complex
within Ust-Luga Ethane-Rich Gas Processing Cluster
Russia

REPORTING PERIOD: (month/year) – (month/year)

REPORT DATE: (day/month/year)

Abbreviations and acronyms used

GPC	Gas Processing Complex
AO	Associated Objects
WB	World Bank
TSF	Temporary Site Facilities
WSF	Water Supply Facility
TO	Temporary Objects
WHO	World Health Organization
WTF	Water Treatment Facilities
RCA	RusChemAlliance LLC
F&L	Fuel and Lubricants
EBRD	European Bank of Reconstruction and Development
PIA	Project Influence Area
PSIA	Project Social Influence Area
ICP	Informed Consultancy and Participation
PPE	Personal Protective Equipment
ChP	Checkpoint
KPI	Key performance indicator
VOC	Volatile Organic Compounds
PTL	Power Transmission Line
IPCC	Intergovernmental Panel on Climate Change
IUCN	International Union for Conservation of Nature
IFC	International Finance Corporation
MPMF	Medium Pressure Methane Fraction
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
CIA	Cumulative Impact Assessment
LLC	Limited Liability Company
EP	Environmental Protection
HSE	Occupational Health, Industrial Safety, Fire Safety and Environmental Protection
EHLP	Environmental, Health and Labor Protection
OS	Occupational Safety
OECD	Organization for Economic Cooperation and Development
AR	Access road
IS	Industrial Safety
ShEP	Stakeholder Engagement Plan
GG	Greenhouse Gases
MAE	Maximum Allowable Emissions
MAC	Maximum Allowable Concentration
MAD	Maximum Allowable Discharges
ESMP	Environmental and Social Management Plan
CMP	Management Plan for Construction Stage

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1. INTRODUCTION

The **Common Terms Agreement (CTA)** requires the Borrower (RusChemAlliance LLC) that implements the Gas processing complex construction Project in Russia (for the purpose of the Report including construction and further gas processing, hereinafter — **Project**) to prepare the Annual Monitoring Report on Environmental and Social Performance Indicators (hereinafter — **Report**).

Each Report shall be drawn up in the form agreed with the Project Lenders — in accordance with this template.

The Report Template can be supplemented where necessary by appendixes that would ensure that all respective information on the Project implementation is provided.

If the Borrower has some requested data in a different format, these data can be provided as appendixes to the present template form.

All information for the Project Report shall, if necessary, include data related to gas processing under the GPC Construction Project.

3. BACKGROUND OF PRIMARY ENVIRONMENTAL AND SOCIAL ASPECTS

3.1. Goals and Objectives of the Report

The report covers all the Project relevant elements as well as gas processing lines operation at GPC. References to information concerning the Project in this Report, if necessary, include information related to gas processing at the GPC.

3.2. Differences of Opinion between Independent Environmental and Social Consultant (IESC) and Borrower

This section shall include a statement of any differences of opinion between the Independent Environmental and Social Consultant (IESC) and the Borrower regarding the content of this or previous Reports.

3.3. Background of Project Environmental and Social Aspects

3.3.1. Project Implementation Status

Provide an overview of the Project status as well as any new events related to the Project including changes in the activity and Project facilities over the reporting period for which notifications are provided.

In case any assets (facilities) have been added to the Borrower Portfolio after expiration of the last reporting period, these shall be listed in this document.

3.3.2. Environmental and Social Accidents

Provide information about all the environmental and social accidents that occurred during the reporting period and should be provided in the Notification according to the Common Terms Agreement.

Date	Accident description	Date of information submission to lenders	Plan of corrective measures and status

3.3.3. Changes concerning environmental and social aspects

Provide information about all the environmental and social changes that occurred during the reporting period and should be provided in the Notification according to the Common Terms Agreement.

Date	Description of change	Date of information submission to lenders	Status	Predicted date the change to be included in respective plan

3.3.4. *Improvements in Performance Indicators Concerning Environmental and Social Changes*

Briefly describe any improvements/initiatives implemented during the reporting period to manage environmental and social changes of the Project (such as power/water savings, sustainable development reports, waste minimization) ¹.

3.3.5. *Reporting on Environmental and Social Issues under Applicable Russian Laws*

List reports on environmental issues submitted to the respective authorities in the Russian Federation.

Prepare information on any type of Environmental Monitoring and inspections implemented by the Russian Federation authorities which require to submit notification under Common Terms Agreement.

Provide detailed information on such environmental and social claims submitted by the Russian authorities with respect to the Project that shall be provided in notification according to the Common Terms Agreement.

¹ Examples of improvements: Improving the environmental and social management system; Publication of an environment/sustainability or corporate social responsibility report (provide a copy or web link); Work on local community development programs; Reducing resource use, strengthening emission control or increasing by-products recycling; Work on improvement of relationships with local suppliers or provision of technical assistance to suppliers; Communication/interaction initiatives; Skills training and other local workforce development programs.

4. PS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

4.1. Evaluation of environmental and social impact/risks

Have there been any additional studies of Project's impacts on environment, society, health and safety as well as related risks during the reporting period?

If yes, provide copies and list all the newly identified risks and impacts or their significant changes.

4.2. Organizational structure of Environmental and Social Aspects Management

Provide the actual Project management organizational structure concerning the environment, health, labor protection and occupational health and safety as well as social issues during the reporting period (in a form of a Diagram or a Table). Also include information on interactions with other Project and contractor teams.

It is required to:

- list persons who are responsible for environmental protection, social sphere, health care, occupational health, human resources, safety and provide their contact details;
- describe any changes over the reporting period.

4.3. Results of Management Plans and Systems Analysis

Provide the results of implementing the integrated management system (IMS) in occupational health, safety, environmental protection issues and local community relations of all contractors in accordance with the implementation plan.

Taking into account the Project in general and all its Subcontractors, provide a summary of internal or external IMS audit in occupational health, safety, security environmental protection issues and local community relations and/or their analysis by the management, paying attention to significant changes:

- functions, obligations and resources within the management system for occupational health, safety, security, environmental protection;
- training and competences;
- efficiency of activity in terms of IMS goals and objectives in occupational health, safety, security, environmental protection issues and local community relations; as well as
- updated or new IMS operative monitoring tools for occupational health, safety, security, environmental protection issues and local community relations.

Taking into account the Project as a whole and all the Subcontractors, include details of significant changes or changes requiring notification that concern the management plans and systems and resulted from audits and/or management-side analysis.

4.4. Interaction with Stakeholders

List measures of interaction with stakeholders including public hearings, consultations and information disclosure, interaction with non-governmental organizations, civil society and local communities on environmental and social issues.

Date	Participant (-s)	Format of interaction	Discussed issues	Company reply/achieved covenants (attach minutes if any)	Undertaken actions (if any)/Notes

4.5. Procedure of Complaints and Requests Review

Indicate the number and type of requests and/or grievances received from persons affected by the Project, local communities, including a summary (no names indicated) of any grievances received during the reporting period with their registration dates, categories of grievances, actions undertaken to resolve a grievance, time necessary to resolve the grievance and updating their status.

How many grievances were resolved and how many are yet to be considered? (Attach the complaint log).

Report the number and types of legal actions for environmental and social matters (Attach a log of all legal actions and their status).

4.6. Community Development Management Plans

Provide all actual information about the state and implementation of plans as it is established by ESMP. Optionally attach respective monitoring reports.

Indicate the implementation status and budget annually spent for community development initiatives.

Community development initiatives	Target community	Implementation status	Overall budget spent up to the reporting date	Sponsor

5. PS2: WORKING CONDITIONS

5.1. Human resources management

5.1.1. Policies and Regulations

Have there been any changes or updating in the policy and procedures of human resources management, personnel administration and procedures on occupational health and safety during the reporting period?

If yes, provide detailed information.

5.1.2. Workforce Statistics

Provide the following information about the workforce:

	Full-time Company personnel count as of reporting date	Full-time Company female personnel count as of reporting date	Company personnel count hired during the reporting period	Personnel turnover	Count of temporary staff involved for certain activities
Previous year					
Reporting year					

Type of employees	Overall count over the reporting period	Count of female personnel	Count of wage workers	Workforce turnover
- full-time Company personnel as of reporting date				
- temporary staff involved for certain activities				

For each Subcontractor involved in the Project, provide the same information about its workforce in the attachment.

For full-time personnel of the Company as of the reporting date, provide statistics concerning new employees, employees to be retired, leave the company or be dismissed.

5.1.3. Personnel Organizations

Provide up-to-date information on personnel organizations both for full-time personnel organizations of the Company and for Contractors and Sub-Contractors personnel organizations by the reporting date at the Project. Describe relations of the Project with these organizations and Solidarity Labor Contracts status.

5.1.4. *Dismissals and Layoffs*

Has there been any significant reduction of personnel count in any Sub-Contractor entity during the reporting period?

Number of dismissed personnel: ____.

If the answer is yes, provide description of the layoff program and its conformity with the Performance Standard 2.

5.1.5. *Procedure for Considering Grievances, Claims and Requests at the Workplace*

Provide up-to-date information on the status of workplace grievance processing procedures related to the Project as well as any contractors and subcontractors including the summary (no names indicated) of any grievances received during the reporting period, with their registration dates, grievances categories (for example, persecution, labor conditions, discrimination, corruption), actions taken to resolve the grievance, time necessary to resolve the grievance, and status updating.

Attach a Register of grievances for each contractor, etc.

List legal actions related with the personnel and describe their status.

5.2. Occupational Health, Safety and Security

Describe main changes introduced in terms of occupational health and safety during the reporting period, for example review of occupational safety management, plans of actions on technical improvement of the used/introduced leading/lagging indicators, identification of hazards, new control measures.

Attach audit reports in terms of occupational health and safety available over the reporting period.

5.2.1. *Monitoring of Workplace Injuries*

Provide data listed below for each subcontractor.

Indicate the total number for each parameter (overall)	Over the reporting period		Last reporting period (not accumulated data) ²	
	Full-time Company personnel as of reporting date	Temporary staff involved for certain activities	Full-time Company personnel as of reporting date	Temporary staff involved for certain activities
Total count of personnel				

² Data to be provided after the plant is commissioned and have operated for at least two years in a row.

Total man-hours worked per year				
Total lost time incidents ³				
Total number of working days lost ⁴ due to injuries				
Frequency of injuries with disability ⁵				
Fatal accidents				
Vehicle collisions ⁶				

Provide detailed information about non-fatal lost-time injuries during this reporting period.

Contractor, Sub-contractor	Total working days lost	Description of injury	Cause of incident	Corrective measures to prevent recurrence of the incident

Provide detailed information about any fatalities during this reporting period (and copies of the accident investigation results as well as relevant remedial plans).

³ A lost-time injury is considered to be an inability to work at least one full-time day after the day of the accident or illness.

⁴ Lost working days are the number of working days (not necessarily consecutive) after the day of injury or illness when the employee was absent from work or his ability to work was limited by an occupational injury or illness.

⁵ The number of injuries with loss of working time registered among Project employees per million man-hours worked by them. Frequency of injuries with loss of working time = number of injuries per million hours worked = number of lost-time injuries × 1,000,000 hours/total number of man-hours worked.

⁶ Vehicle collisions: When a vehicle (a device used to transport people or goods) collides with another vehicle or an inanimate or animate object (-s), resulting in injury (except in cases limited to first aid) or death.

Date of accident/injury	Type of accident/injury	Description of the accident/injury (if possible, specify the time of death after the accident: for example, immediately, within a month/year)	Death toll	Preventive measures taken after the incident

5.2.2. Occupational Safety Training

Describe the training programs on occupational safety implemented over the reporting period.

Date	Audience type (employees of the Company or contractor (-s)/ subcontractor (-s))	Description of the training (and its duration)	Number of participants

5.2.3. Monitoring at the Workplace

Provide a copy of any workplace monitoring reports developed during the reporting period.

5.2.4. Life Safety and Fire Safety

Fill in the following table regarding operations along the corridor and in the port.

Fire safety inspection activities	Date (-s) of inspection and inspected sites	Detected deficiencies⁷	Corrective actions and their implementation schedules⁸
Fire drills (training)			
Other measures to work out actions in an emergency situation			
Verification and certification of fire detection and extinguishing systems			
Inspection and refilling of fire extinguishers			
Life safety audit and fire safety assessment			

⁷ Attach additional sheets as necessary to fully describe the deficiencies detected.

⁸ Attach additional sheets as necessary to fully describe the corrective actions and their implementation.

6. PS3: RESOURCE EFFICIENCY AND ENVIRONMENTAL POLLUTION PREVENTION

6.1. Environmental Monitoring

Provide copies of reports on environmental conditions monitoring (fresh water quality, waste water, total suspended solid particles/dust/gaseous emissions, dust deposition, ambient air quality, noise and vibration, quality of marine sediments) over the reporting period obtained according to ESMP. Include compliance analysis and determination of ambient air quality trends. If any of the World Bank Group General Health and Safety Guidelines and applicable industry guidelines for natural gas processing or local regulatory limits are exceeded, the reason of the overrun should be explained and, if necessary, the scheduled corrective action should be described to prevent the repetitive overrun.

Briefly describe the measures to reduce the environmental impact of the Project implemented during the reporting period to meet environmental and social requirements.

Include for each environmental component (for example, fresh water quality, waste water, air emissions and noise and vibration quality) a final summary table of all parameters monitored during the reporting period. KPI also should be presented in the table for each of the monitoring requirements according to the following example (the numbers and frequency given below are only indicative; tables must meet the requirements set by ESMP).

Parameter	Task	Conducted monitoring	Achievements (KPI)	Threshold levels excess	Detailed information about the found excess	Control action performed in response to detected excess

6.2. Greenhouse Gases

Scope of action 1. Direct greenhouse gas emissions from gas processing operations implemented by the Borrower. An example of a reporting format could be as described below.

Fixed Sources of Combustion Gases

Clause	Figure	Unit	Note/Source
Fuel type 1 (e. g. heavy fuel oil)			
A1 — Consumption of heavy fuel oil		kg	
B1 — Heating value of heavy fuel oil (lower heating value)		kcal/kg	
Fuel type 2 (e. g. light distillate fuel)			
A2 — Consumption of light distillate fuel		kg	
B2 — Heating value of light distillate fuel (lower heating value)		kcal/kg	
Fuel type... [Specify]			
A... — Fuel consumption		kg	
B... — Heating value of fuel		kcal/kg	
Fuel type... [Specify]			
An — Fuel consumption		kg	
Bn — Heating value of oil (lower heating value)		kcal/kg	
C — Total amount of CO₂ emissions of level 1 (direct) (in CO₂ equivalent)		t CO ₂	$C = (A1 * B1 + A2 * B2 + \dots + An * Bn) * 0.99 * 20.2 * 4.186 * 10E(-9) * (44/12)$

Comment: The above calculation methods are based on the 1996 Guidelines of the Intergovernmental Panel on Climate Change. Alternatively, another recognized method for calculating greenhouse gas emissions can be used.

Mobile Sources:

Provide an estimate of CO₂ emissions from mobile sources (for gasoline).

Year	Total number of vehicles	Total mileage (km)	Gasoline consumption		Gasoline vehicle efficiency (l/km)	Factor of CO2 emissions (kg CO2/TJ — lower heating value)	CO2 emissions (tons of CO2)
			(l)	(TJ — lower heating value)			
		D	E	F	G = E/D	H = 69,300	I = F * H/1000
2021							
2022							
.....							

Comment: The factor of CO₂ emissions (for gasoline) is 69,300 kg CO₂/TJ — the lower heating value according to the Guidelines of the Intergovernmental Panel on Climate Change dated 2006.

Estimated CO₂ emissions from mobile sources (for diesel engines).

Year	Total number of vehicles	Total mileage (km)	Diesel fuel consumption		Diesel vehicle efficiency (l/km)	Factor of CO2 emissions (kg CO2/TJ — lower heating value)	CO2 emissions (tons of CO2)
			(l)	(TJ — lower heating value)			
		J	K	L	M = K/J	N = 74,100	O = L * N/1000
2021							
2022							
.....							

Comment: CO₂ emission factor (for diesel) is 74,100 kg CO₂/TJ—the lower heating value according to the Guidelines of the Intergovernmental Panel on Climate Change dated 2006.

Total tons of CO₂ — Scope 1 Annually generated emissions under the Project:

$$T = C + I + O =$$

Scope of action 2. CO₂ emitted from off-site energy production for the Project (purchased electricity in Russia) = _____ tonnes.

Total tons of CO₂ generated annually by emissions from the Project =

Provide detailed calculation reports, if any.

Analysis of Results

Include analysis of the above results, including:

- comparison with the monitoring results of previous years as well as
- description of certain initiatives aimed at improving energy efficiency/reducing greenhouse gas emissions.

6.3. Resource Efficiency: Energy and Water

Provide data on energy and water consumption for the reporting period. If the requested data is available in a different format, it can be presented instead of the requested data.

Resource type	Units of measurement	Annual consumption			Total
		Property No. 1	Property No. 2	Property...	
Grid power supply	kWh				
Natural gas	m ³				
Diesel fuel	L				
Other fuel (specify)	L				
Water	m ³				

If electricity is generated at the site, describe the electricity generation facility and provide information on the levels of emissions into the atmosphere and their compliance with national standards and applicable values in accordance with the Guidelines of the World Bank Group concerning the Health, Environment and Safety.

Describe measures/efforts to improve resource efficiency taken to minimize fuel, energy and water consumption.

6.4. Hazardous and Non-Hazardous Waste⁹

Clause	Hazardous wastes					
	Generated volume ¹⁰	Processed	Disposed of	Processing factor (%)	Method of storage and/or processing ¹¹	Disposal method ¹²

⁹ Types of wastes include, inter alia: containers for chemical substances, chemical sludge, containers/pallets, dewatered sludge, household wastes, ferrous and non-ferrous scrap metal, hospital wastes, laboratory wastes, liquids, sub-standard raw materials, paint residues, sludge, solid substances, automotive and non-automotive tyres, hydrocarbons from spent fuel, waste hydraulic fluids, spent lubricating hydrocarbons, waste solvents, sludge for waste processing, contaminated soil, creosote sleepers, etc.

¹⁰ Specify the total weight (in metric tons) or volume (m³)/month and the total weight (in metric tons) or volume (m³)/year.

¹¹ Indicate in what way the collected waste is stored on site (e. g. in drums, wastebaskets, other type of containers, etc.) and what treatment has been implemented (e. g. curing, filtration, etc.).

¹² For example, landfill placement, incineration, agricultural use, reuse, etc.: (1) submit additional sheets as necessary to fully describe waste disposal methods, waste management organizations, permits for installation placement, agency permits, etc.; (2) indicate the name and location of the facility used for disposal; indicate if the waste is sold as a by-product, scrap or material for use by other persons; the legal name and type of activity of the

	A	B	C = A - B	D = B/A		
Used fuels and lubricants						
Batteries						
Fuel						
Waste waters						
...						

Clause	Non-hazardous wastes					
	Generated volume ¹³	Processed	Disposed of	Processing factor (%)	Method of storage and/or processing ¹⁴	Disposal method ¹⁵
	A	B	C = A - B	D = B/A		
Household wastes						
Packing Containers						
...						

6.5. Erosion Control, Slope Stability and Restoration

Describe the status and actions taken in terms of erosion control, slope stability and restoration of the soil layer within the Project and its zone of influence.

buyer.

¹³ Specify the total weight (in metric tons) or volume (m³)/month and the total weight (in metric tons) or volume (m³)/year.

¹⁴ Indicate in what way the collected waste is stored on site (e. g. in drums, wastebaskets, other type of containers, etc.) and what treatment has been implemented (e. g. curing, filtration, etc.).

¹⁵ For example, landfill placement, incineration, agricultural use, reuse, etc. Proposed responses: (1) Submit additional sheets as necessary to fully describe waste disposal methods, waste management organizations, permits for installation placement, agency permits, etc. (2) Indicate the name and location of the object used for disposal; indicate if the waste is sold as a by-product, scrap or material for use by other persons; the legal name and type of activity of the buyer.

7. PS4: HEALTH CARE AND PUBLIC ORDER PROTECTION

7.1. Health Care and Public Order Protection

List and describe any initiatives implemented in relation to public health and safety during the reporting period. Include (i) risk/safety assessments, (ii) new infrastructure and equipment, (iii) hazardous materials and safety management procedures, (iv) resources, and (v) public safety awareness programs.

For each of the above items, provide a list and description of actions, expected or actual deadlines for implementation, progress/status and results obtained. It is possible to use a tabular format (as shown below) or present the information as an attachment to the report.

Questions	Mitigation measures	Expected or actual implementation date	Results/Current status

Have there been implemented any activities during the reporting period aimed to train emergency response actions with participation of local authorities, public emergency organizations and local communities? Are communities aware of emergency response plans?

Describe fire safety and life safety inspection programs for public buildings/passenger trains.

Life safety and fire safety inspection activities	Obligatory frequency	Date (-s) of completion	Detected deficiencies	Corrective actions and schedule for correction actions implementation

Provide a detailed information on up-dating the existing course programs on occupational safety for manual workers.

7.2. Reporting of Fatal and Non-Fatal Accidents

Provide detailed information about any non-fatal accidents involving third parties during the current reporting period.

Date of the incident	Type of the incident	Incident description	Casualty toll	Preventive measures taken after the incident

Provide detailed information about any fatalities during this reporting period (and copies of the accident investigation results as well as relevant remedial plans).

Date of the incident	Type of the incident	Incident description	Death toll	Preventive measures taken after the incident

Provide detailed information about (i) any incidents involving hazardous materials (including fuel).

Date of the incident	Type of the incident	Incident description	Number of casualties/volume of hazardous substances involved in the incident	Preventive measures taken after the incident

7.3. Security Management

Describe significant changes (1) in the interaction of the Project with private and government security agencies during the reporting period and under any relevant agreements, (2) any verification and training in accordance with industry best practices, and (3) in the Project's system designed to investigate, report and review credible endorsement of illegal or abusive actions by security/armed forces personnel.

Report any security incidents requiring notification of them that occurred during the reporting period related to Project activities. Include detailed information about any corrective actions planned or taken in relation to such incidents and their status.

8. PS5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

8.1. Resettlement Factors

The following information should be provided:

Indicate changes as compared to the previous reporting period.

	Total area (ha)	Total families/ Business entities	Total individuals	Resettled/ Returned to their place of residence by now	Awaiting resettlement/ return	Comments
1. Physically resettled						
2. Economically resettled						
3. Physically and economically resettled (in both senses)						
TOTAL						

8.2. Land Allocation

Provide the following information regarding any acquisition of land required for the Project that took place during the reporting period. Provide information/attach an appropriate Plan for the acquisition of land and compensation for lost funds depending on the circumstances.

	Number of plots	hectare	Status of land acquisition in % of total area
Total area acquired during the reporting period			
Total area of agricultural land affected by the Project			

8.3. Restoration of the Livelihood

Describe the status and progress of the implementation of livelihood restoration programs during the reporting period. It is possible to attach reports on the monitoring results prepared within the framework of the programs.

Specify special measures for cases of particularly vulnerable groups (elderly people, households that support women, etc.).

8.4. Work with Grievances and Appeals

Use the Table presented below or submit your own records, if these contain the necessary information, to compile a list of any grievances or disputes regarding the land acquisition and forced relocation received or arising during the reporting period; describe in what way the grievance/dispute has been reviewed and its current status.

Date of grievance/ dispute/appeal	Appellant of grievance/appeal	Question	Resolved (Yes/No)	Action taken	Date of closure

9. PS6: CONSERVATION OF BIODIVERSITY AND RATIONAL MANAGEMENT OF LIVING NATURAL RESOURCES

9.1. Biodiversity Management

Describe the status and progress in implementation of the biodiversity management plan within the framework of ESMP for the reporting period. Attach relevant reports containing results of biodiversity monitoring.

Based on the results of monitoring programs, report on the following aspects, as necessary, and the relevant assessments and mitigation measures of the Project impact carried out during the reporting period:

If necessary, using the table below, describe any new activities or extensions of its existing types that led to the extension of the Project to new biota habitats during the reporting period.

New activity/extension	Total area covered	Habitat type: Description	Habitat type: Classification (modified/natural/critically sensitive habitats)	Control actions ¹⁶

¹⁶ List the mitigation/compensation measures of the Project impact identified in the CCCV Plan to ensure “No Net Loss” of biodiversity under the impacts on natural habitat or Net Gain of biodiversity under the impact upon critically sensitive habitats.

10. ENVIRONMENTAL AND SOCIAL ACTION PLAN

Insert an Action Plan on Environmental and social aspects

	Closed
	Performed according to the schedule
	Risk of non-fulfilment
	Not completed ¹⁷

Scope of action	Measure	Completion dates	Completion indicator	Status as of DD/MM/YYYY [provide details]	% completed [provide details]	Completion date*	Actions proposed for the next reporting period

* to be reported after the activities on this issue are completed and the % of implementation is 100 %.

¹⁷ For all items highlighted in red, provide detailed information about the plan to eliminate the corresponding problem.

11. DEVIATIONS/NONCONFORMITIES

Deviations from/nonconformities with the requirements presented below during the reporting period should be listed in this section:

- i. Necessary permits on issues of the natural and social environment;
- ii. Environmental and Social Action Plan;
- iii. Legislation, codes and standards of the Russian Federation (RF);
- iv. current international laws and conventions;
- v. current requirements of the international Lender, including:
 - a. Equator Principles (2013),
 - b. General approaches of Organization for Economic Cooperation and Development (2012),
 - c. Performance standards of International Finance Corporation (2012),
 - d. The World Bank Group Guidelines on the Environment, Health and Safety, including the General Guidelines on the Environment, Health and Safety (April 2007) and industry guidelines (Guidelines on the Environment, Health and Safety in the Field of Natural Gas Processing and Guidelines on the Environment, Health and Safety for Ports, Harbors and Terminals).
- vi. Environmental and social legislation;
- vii. Environmental and Social Management Plan; as well as
- viii. IMS on occupational safety, health, safety, ecology and relations with local communities.

Make entries in the table below about any nonconformity/deviation that occurred during the reporting period, providing additional information as an appendix as necessary. Explain the reason and, if necessary, describe the planned corrective actions to prevent the recurrence of such inconsistencies.

Environmental and social requirements (e. g. para, (i) — (xi) above)	Identified nonconformities	Corrective actions	Status of performing corrective actions	Date of completion of corrective actions/planned date of their completion

ПРЕДВАРИТЕЛЬНЫЙ ПРОЕКТ

Summary Report on Compliance with Requirements of the Environmental and Social Management Framework Plan and Construction Management Plans¹

(reporting period: quarter; year)
(form)

1. Status of works on the Project (compliance with the calendar and network schedule, changes, status of completed work, etc.).

2. List of Subcontractors operating at the construction sites of the GPC.

Table 1

Item No.	Subcontractor	Type of activity (construction, maintenance, operation, provision of services)	Period of works execution	Note
1	2	3	4	5
1				
2				

3. Status of contractor and subcontractor management systems implementation including implementation of Environmental and Social Management Framework Plan (hereinafter — SM Framework Plan) and Construction Management Plans (hereinafter — CMP).

Table 2

Item No.	Contractor, Subcontractor	Administrative document on implementation	Availability of own plan for the CMP implementation	Implementation status
1	2	3	4	5
1				
2				

4. Status of execution by the contractor and subcontractors of ESAP², CMP (according to Annex No. 1 for each CMP).

Table 3

Item No.	Contractor, Subcontractor	Framework ESMP, CMP, ESAP	Compliance status (yes/no)	Note
1	2	3	4	5
1				

¹ Tables in addition to the main report in Microsoft Word shall to be presented in Microsoft Excel. The form of the Report can be corrected or complemented according to the results of received information.

² Environmental Social Action Plan. Information about the status of ESAP execution shall be provided after the Plan is submitted.

2				
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5. Implementation Status of Plan for Interaction with the Interested Parties.

6. Information on availability/unavailability of permits³.

Table 4

Item No.	Contractor, Subcontractor	Name of the permit document	Details of the permit document	Date of approval	Reference to RD	Availability status	Note
1	2	3	4	5	6	7	8
Occupational Safety							
1							
2							
Industrial Safety							
1							
2							
Fire safety							
1							
2							
Environmental Protection							
1							
2							
Transport safety, logistics							
1							
2							
Employment and working conditions							
1							
2							
Cultural heritage							
1							
2							
Indigenous people							
1							
2							

7. Obligatory payments made by the contractor and subcontractors (costs of occupational safety measures, payment for negative impact, costs of obtaining licenses to operate a hazardous production facility, etc.).

Table 5

Item No.	Contractor, Subcontractor	Type of mandatory payment	Payment date	Type of mandatory payment	Note
1	2	3	4	5	6
1					
2					

8. Fines resulted from violations identified as a result of inspections of executive authorities, as well as fines imposed by the contractor to subcontractors.

³ A complete list of necessary permits should be indicated with a description of the availability or unavailability of permits, the terms of the planned order with a reference to the supporting document.

Table 6

Item No.	Contractor, Subcontractor	The executive authority that conducted the audit	Detected violation	Reference to RD	Amount of fine	Note
1	2	3	4	5	6	7
1						
2						

9. Extent of damage caused to the environment.

Item No.	Contractor, Subcontractor	The executive authority that conducted the audit	Detected violation	Reference to the harm calculation methodology	Extent of damage, rub.	Note
1	2	3	4	5	6	7
1						
2						

10. Inspections, audits, monitoring, control by governmental authorities, internal corporate control of Gazprom PJSC, RusChemAlliance LLC.

Table 7

Item No.	Contractor, Subcontractor	Inspection authority (organization)	Inspection date	Number of detected nonconformities	Number of eliminated nonconformities	Note
1	2	3	4	5	6	7
1						

Analysis of identified nonconformities (consistency, repeatability, causes of occurrence, corrective actions, etc.).

Information on the results of internal audits and Level 3 audits.

11. Analysis of received appeals from interested parties.

12. Environmental and social performance indicators, achievement of key performance indicators.

Table 8

Item No.	Contractor, Subcontractor	Framework ESMP, CMP	Key performance indicator, %	Reasons for not achieving the key performance indicators	Note
1	2	3	4	5	6

13. Number of environment and social incidents during the period (distributed by areas of control⁴).

⁴ - environmental protection (oil spills, excessive negative impact, etc.);

- accident (related to production, not related to production);

- microtrauma;

- acute occupational disease (poisoning);

- traffic accidents;

- incident, accident at a hazardous production facility;

- fires.

Table 9

Item No.	Contractor, Subcontractor	Date of the incident	Type of the incident	Brief description	Note
1	2	3	4	5	6
1					
2					

Analysis of identified accidents (consistency, repeatability, causes of occurrence, corrective actions, etc.).

14. Other environmental and social information provided according to KPIs given in the CMP.

14. Conclusions based on the results of activities and recommendations (analysis based on the results of the information received, the need to develop corrective actions).

ПРЕДВАРИТЕЛЬНЫЙ ПРОЕКТ