

APPROVED  
by Order of RusChemAlliance LLC  
No. PXA-П/168, dated 21.11.2022

**REGULATION**  
**on Industrial Safety Compliance Monitoring**  
**of RusChemAlliance LLC**

St. Petersburg

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## 1. General

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).

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 supervision;
- industrial safety supervision.

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.

1.4. MCISR is carried out with regard to all Contractors/Subcontractors that take part in the GPC ERGPC construction project and that carry out works directly at the GPC ERGPC construction site facilities.

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 requirements must be used by the Owner structural units as well as the third parties and individuals (individual entrepreneurs) (hereinafter — Contractors/Subcontractors) involved in the execution of construction, service, commissioning and other works performed during the Project implementation. Agreements with third parties and individuals (individual entrepreneurs) must necessarily refer to the Regulation in the terms in conditions covering the Regulation provisions.

## 2. Terms, Definitions, Designations and Abbreviations

2.1. The following terms and 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 Customer and proper execution of obligations under the Contract.

**Noncompliance with the industrial safety requirements** — derogation from the legislative industrial safety requirements as well as from the ISCS requirements;

**Hazardous occurrence (hazardous situation)** — 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;

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

**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** — any undesirable event occurred that resulted or could have resulted in a damage to employee health at the production facility, in an accident, incident or fire, a road traffic accident;

**Target audit** — an audit realized by the Industrial Safety Group, the Environmental Protection Group to monitor the execution of Industrial Safety Requirements (the Industrial Safety Requirement for a

target audit are established according to the Regulation);

**Daily inspection** — an inspection realized by the Owner Industrial Safety Group, Environmental Protection Group every day to check the Contractors compliance with the HSE requirements and aimed at building safety culture and continuous control of the Contractor's HSE Activities;

**Works suspension** — temporary prohibition to execute certain works or activities, operate machines, equipment, use buildings, facilities, prohibition to give employees access to certain site/premises when industrial and fire safety, occupational health and environmental protection, electrical safety requirements have not been implemented with the view to prevent occupational accidents, road traffic accidents, accidents and incidents as well as negative impact on the environment until the nonconformities (noncompliances) being the reasons of the works suspension and risks and hazards are eliminated.

**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

**Certificate** — certificate on detected violations of the Russian Federation Legislation and other Local Normative Legal Acts applied to Health, Industrial and Fire Safety and Environment Protection

**GPC ERGPC** — Gas processing complex within Ust-Luga ethane-rich gas processing cluster

**RTA** — road traffic accidents

**CA** — Corrective actions

**MCISR** — Industrial Safety Compliance Monitoring

**MS** — Owner medical service

**EPG** — Owner Environmental Protection Group

**EP** — Environmental Protection

**ISG** — Owner Industrial Safety Group

**OH, IFS** — Occupational Health, Industrial, Fire Safety

**PPE** — safety clothes, safety footwear and other personal protective equipment

**SU** — Structural Units

**ISPSM** — integrated system of process safety management

**CPED** — Owner Chief Power Engineer Division

### 3. References to Regulatory Acts

The Regulation has been developed in accordance with the Russian Federation normative and legal acts requirements as well as Owner's local normative acts in effective revisions 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.

### 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 Chief Engineer — First Deputy Director General.

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

I level — at I level the MCISR is implemented by means of self-checking by the employees, the Subcontractor Officials and SU appointed to be responsible for compliance with the industrial safety requirements and by means of documenting the monitoring results.

II level — at II level the MCISR is implemented by the Contractor Officials appointed to be responsible for compliance with the industrial and environmental safety requirements.

III level — at III level the MCISR is implemented by ISG jointly with EPG, CPED, MS. EPG audit plan at III level is given in the RusChemAlliance LLC Regulation for production environmental control.

With the view to organize MCISR at III level the Owner has right to involve a specialized organization to monitor the compliance with the industrial requirements by Contractors and Subcontractors at the GPC ERGPC construction site.

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 the Chief Engineer — First Deputy General Director, ISG Head.

4.4. The 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 audit of compliance with the industrial safety requirements at his designated workplace.

5.2. MCISR II level participants are Subcontractor Officials appointed to be responsible for compliance with the industrial, environmental safety requirements.

5.3. MCISR III level participants are the ISG employees jointly with EPG, CPED, MS.

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.

## **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 process control and management, 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:

- Certificates (Form of Certificate is given in the Regulation for the Interaction Between the Parties on Health, Industrial and Fire Safety, and Environmental Issues);
- Reports on elimination of violations detected during the audit (Form of Report on elimination of violations detected during the audit is given in the Regulation for the Interaction Between the Parties on Health, Industrial and Fire Safety, and Environmental Issues).

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 Subcontractors shall be reviewed by the Contractor in accordance with the check-list containing the list of main issues to be checked for compliance with industrial safety requirements (hereinafter — the Check-list). If required, the main issues may be reviewed (Form of Check-list is given in the Regulation for the Interaction Between the Parties on Health, Industrial and Fire Safety, and Environmental Issues).

6.6. To monitor elimination of violations identified in the course of MCISR, the Register of Detected Violations shall be kept (Form of Register of Detected Violations is given in the Regulation for the Interaction Between the Parties on Health, Industrial and Fire Safety, and Environmental Issues).

6.7. The Certificates, Reports, Registers of Detected Violations shall be sent in favor of the Contractor by the Subcontractor industrial safety specialists to approve the nonconformities elimination.

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

## **7. MCISR II Level Preparation and Implementation**

7.1. MCISR II level is implemented by the Contractor Officials appointed to be responsible for compliance with the industrial, environmental safety requirements.

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

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

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

- Certificates;
- Reports on elimination of violations detected during audit).

7.5. To monitor elimination of violations identified in the course of MCISR, the Register of Detected Violations shall be kept.

7.6. The Certificates, Reports, Registers of Detected Violations shall be sent by the Contractor's representatives in favor of 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. MCISR III level 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 occupational health safety at the GPC ERGPC construction sites implemented by the Owner (Attachment No. 2).

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

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

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

8.5. When identifying during the MCISR III level comprehensive audit the facts of unsatisfactory implementation of the MCISR at the I, II levels, including identification of the repeated or unresolved problems of noncompliance with the industrial safety requirements before the Dew Date, the MCISR III level participant shall send a memo in favor of the Legal Division and the SU that is the Contract Administrator 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 Certificate shall be drawn by the III level MCISR Chairman on the last MCISR audit day. The Comprehensive Audit Certificate 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 the Contract Administrator. The refusal by the Contractor to sign the Comprehensive Audit Certificate shall be performed as per the Regulation for the Interaction Between the Parties on Health, Industrial and Fire Safety, and Environmental Issues.

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.

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

8.9. Between the joint audits of ecological, industrial, fire and occupational health safety at the GPC ERGPC Site the Owner experts shall perform daily inspection of the construction site to check the compliance with the HSE requirements followed by the preparation of the Report on the Construction Site HSE inspection (Attachment No. 3).

8.10. During the daily inspection the person performing the inspection shall make photos of the detected violations (if possible).

8.11. The earlier detected violations the Dew Date of which has not expired shall not be recorded.

8.12. When gross violations are detected that can endanger the health of life of people or that can become the reason of an emergency, but that do not require suspension of works, they shall be immediately registered in writing in the form of a Proposal (Attachment No. 4) that shall be handed over to the

implemented works supervisor or, if the supervisor is not present, to the violator.

8.13. The written proposal shall be executed in two copies, the first is handed over to the works supervisor or, if the supervisor is not present, to the violator, and the second copy having the record confirming its handing over is kept by the Owner.

8.14. The report on the performed HSE inspection at the construction site shall be sent within 24 hours from the inspection completion in favor of the Subcontractors Assignees by e-mail, and the information on the detected violations shall be entered to the register for further elimination of violations (nonconformities).

8.15. The information entered into the executed proposals shall be recorded to the report on the performed construction site HSE inspection.

## **9. Claim Work**

9.1. Penalties for non-performance of HSE requirements, other liabilities and remedies for the Owner shall be set as per the terms and conditions of the contracts concluded with the Contractor.

9.2. The Certificate is the document confirming the HSE violation by the Contractor.

9.3. The ISG shall send the Joint Audit Certificates in favor of the Contract Administrator within 5 (five) business days from the day the Certificate is sent officially to the Contractor/ Subcontractor.

9.4. The Contract Administrator shall perform the claim work as per the RusChemAlliance LLC Regulation on Contracts Conclusion and other Owner local normative acts on claim work.

## **10. Organization and Implementation of Target Audits**

10.1. The target audits of compliance with the industrial safety requirements (hereinafter — target audits) shall be carried out by the ISG employees involving the Owner EPG, CPED, MS.

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 the GPC ERGPC construction site during the period from the latest comprehensive audit date;

- late elimination of previously detected nonconformities, as well as late implementation of the federal supervision entities and corporate monitoring orders according to the results of reports submitted in accordance with the Regulation;

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

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

- instructions from Gazprom PJSC, RusGazDobycha JSC.

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

- Certificate within 3 (three) business days;

- Certificate on suspension and recommencement of works by the Contractor (Attachment No. 5) if nonconformities with the Industrial Safety Requirements are identified. The works suspension and recommencement criteria, procedure are given in Section 13 hereof.

## **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 to check the conformity with industrial safety requirements;
- number of identified and eliminated violations of the Russian Federation legislation industrial safety requirements;
- information about target meetings organized on the industrial safety problems, preventive measures, practical training activities as well as verification audits;
- status of the incidents occurring at the Project construction sites (prompt notification on the incident shall be sent not later than 2 (two) hours after the incident occurrence, the form of the prompt notification on the incident is given in the Regulation for the Interaction Between the Parties on Health, Industrial and Fire Safety, and Environmental Issues);
- Summary report on compliance with the Environmental and Social Management Framework Plan and with Construction Management Plans (form of the Summary report on compliance with the Environmental and Social Management Framework Plan and with Construction Management Plans is given in the Regulation for the Interaction Between the Parties on Health, Industrial and Fire Safety, and Environmental Issues);
- Report on elimination of violations detected during audits;
- Industrial Safety and Environmental Protection Report (Attachment No. 6);
- HSE Incidents Register (form of HSE Incidents Register is given in the Regulation for the Interaction Between the Parties on Health, Industrial and Fire Safety, and Environmental Issues);
- Monitoring Report on Environmental and Social Aspects of Project Implementation (form of the Monitoring Report on Environmental and Social Aspects of Project Implementation is given in the Regulation for the Interaction Between the Parties on Health, Industrial and Fire Safety, and Environmental Issues);

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 compliance with the Environmental and Social Management Framework Plan and with Construction Management Plans.

## **13. Works Suspension**

13.1. Grounds for works suspension

The circumstances requiring works suspension are the hazards of:

- trauma or death, an incident during the work, service implementation;
- accidents;
- road traffic accident;
- fire;
- environmental pollution;
- absence at the work execution venue of the Permit to Work or its improper execution when high hazard works are being implemented, failure to perform the actions listed in the Permit to Work in full;
- absence at the work execution venue of properly functioning tools and devices, safety signs, fire fighting equipment and tested tools and appliances, tooling systems, labor-saving tools, equipment that shall be compliant with the rules, instructions on the work execution and (or) are listed in the Permit to Work, in the Owner ISCS requirements;
- work execution by the employees and involvement of personnel having no required permit, training, certification and/or having not passed the briefings required for the works and/or services execution;
- absence at the works execution venue of the responsible person;
- nonconformity of the full team listed in the Permit to Work;
- absence of air composition measurement when it is required for the works execution;
- absence of risk assessment when performing the high hazard works;



- presence of workers among the involved personnel with signs of probable intoxication with alcohol/drugs/other toxic substances and/or feeling badly;
- absence of the PPE for the involved personnel or failure to apply the PPE that are required for the specific works and are listed in the Permit to Work;
- use by the involved personnel of the PPE, tools, equipment, appliances, tooling systems, labor-saving tools that shall pass regular checks but have no records on the latest check or that have obvious structural integrity problems;
- abrupt change of weather (thunderstorm, squall wind of more than 15 m/s) that endanger the safety of the works performed outdoors;
- presence of orders from governmental authorities if not all of the conditions for the works recommencement had been implemented;
- execution by the Contractors/Subcontractors in the territory transferred to the Contractor for the works execution of joint works in absence of the concurrent works execution schedule, violation of the concurrent works execution procedure, violation/failure to implement the activities prescribed for the concurrent works execution;
- absence of collective protection equipment, failure of the collective protection equipment, improper use of the collective protection equipment;
- absence or improper execution of the method statement, flow charts and other control and engineering documentation at the works execution venue, lack of the personnel acquaintance with the method statement, flow charts and other control and engineering documentation.

Works shall also be suspended in other cases when they are performed with violations that actually endanger their safe execution.

#### 13.2. General requirements for the works suspension:

- ISG, EPG employees, when they detect the circumstances listed in clause 13.1. hereof that require suspension of works, must immediately take measures to suspend the work or to prevent their recommencement until the hazards are eliminated in full;
- ISG, EPG employees have the right to suspend the works on their own if the responsible superintendent/supervisor of the works or another Contractor's/Subcontractor's Representative is absent and if the Contractor's/Subcontractor's Representative refuses to suspend the works when there are the grounds for the works suspension as per clause 13.1. hereof;
- suspension and recommencement of the works shall be performed with account of the current Russian Federation laws and the Regulation;
- the works can be suspended only by the responsible superintendent/supervisor of the works or another Contractor's/Subcontractor's Authorized Representative (according to the authorities and responsibilities they have as per the Contractor's Administrative Documents), except for the cases expressly described in this clause of the Regulation;
- when the works are suspended by the responsible superintendent/supervisor of the works or another Contractor's/Subcontractor's Authorized Representative, due measures for safe works, services abandonment shall be taken;
- the decision on the works suspension shall not be taken when the works suspension can become the reason of a more dangerous situation than their continued implementation;
- the circumstances that have become the reason for the work suspension shall be reported to the ISG manager, the decision on the suspension (recommencement) of the works shall be approved by the ISG manager in any form.

#### 13.3. Works Suspension

When the circumstances requiring works suspension are detected, the Owner employee shall:

- inform the ISG, EPG about the grounds for the works suspension (depending on the nature of the ground for the works suspension listed in clause 13.1. hereof);
- immediately inform the actual works executors about the existing hazards.

#### 13.4. When an ISG employee receives the information that requires the works suspension, he shall:

- immediately go to the detected violation (nonconformity) site;
- assess the grounds and risks of the works suspension together with the responsible

superintendent/supervisor of the works and based on that assessment independently make the decision on the suspension or recommencement of the works;

- execute the Certificate on suspension and recommencement of works by the Contractor (Attachment No. 5);
- register the suspension/recommencement of the works in the Works Suspension/recommencement Log (Attachment No. 7).

When the decision on the works suspension is made:

- instruct the responsible superintendent/supervisor of the works on the immediate suspension of the works;
- control the instruction implementation;
- immediately inform the capital construction division, the chief mechanical engineer group about the decision on the suspension of the works by e-mail;
- after informing the responsible superintendent of the works about the works suspension, take back the Permit to Work for the period of the works suspension;
- inform the supervisor of the works about the works suspension and about the conditions of their recommencement;
- when the decision on the works recommencement is made, require from the responsible superintendent the implementation of the HSE risk mitigation activities and of the activities to increase the safety of the work executors and ensure the control of their implementation;
- when the works are suspended because a worker is suspected to be intoxicated with alcohol/drugs/other toxic substances and (or) to be feeling badly, the worker shall be immediately sent for medical examination;
- record the fact of remedial action implementation/works recommencement in the Works Suspension/recommencement Log (Attachment No. 7) and in the Works Suspension/ recommencement Certificate;
- control the works recommencement after their suspension.

When the ISG, EPG employees make the decision to suspend the works, the Contractor's/Subcontractor's Representative shall:

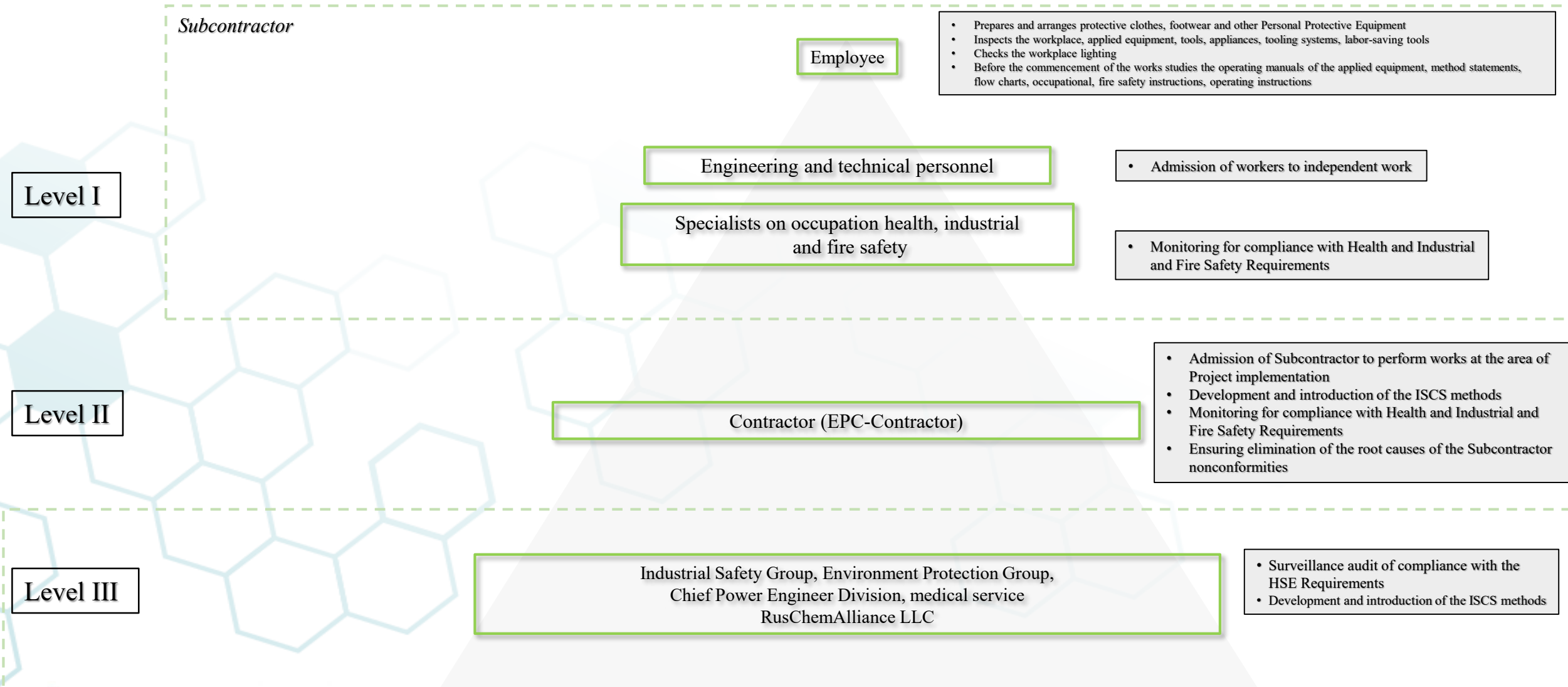
- immediately suspend the works and ensure safety of the works executors;
- inform the works supervisor and their immediate manager about the works suspension;
- take all possible measures to recommence the works and report on the performed activities.

If the Contractor's/Subcontractor's Representative refuse to suspend the works, the ISG, EPG employees suspend the works on their own as per clause 13.2. hereof.

13.5. For each works suspension fact the Contractor shall within 3 business days from the day of the works suspension create a committee consisting of the committee chairman and committee members (not less than 3 members) in order to identify the reasons and circumstances of the suspension by 5 Why method (form of Report on investigation by 5 Why method is given in Attachment No. 8, it shall be sent in favor of the Owner on the day the investigation is completed by e-mail HSE@baltlng.ru).

13.6. Works suspension by the Owner, removal of the Contractor/Subcontractor employees from the facility or from work by instruction from the Owner as per the current clause and in other cases prescribed by the Regulation shall never serve as the ground for changing the works execution schedule under the Contract and/or for the release of the Contractor of any responsibilities under the Contract and for the creation of the Owner liability to reimburse for any losses of the Contractor related to such suspension or removal.

Diagram for MCISR while implementing GPC ERGPC Construction Project



**APPROVED BY**  
**Chief Engineer — First Deputy General**  
**Director**

\_\_\_\_\_  
\_\_\_\_\_ 20 \_\_\_\_\_

**SCHEDULE**  
**of Joint Inspection on**  
**Environmental, Industrial, Fire and Occupational Safety**  
**at Gas Processing Complex within Ust-Luga Ethane-Rich**  
**Gas Processing Cluster Construction Site<sup>1</sup>**  
**for \_\_\_\_\_ (year)**

| <b>No. Item</b> | <b>Month<sup>2</sup></b> | <b>Scope of control<sup>2</sup></b> |
|-----------------|--------------------------|-------------------------------------|
| 1               |                          | All Contractors                     |
| 2               |                          | All Contractors                     |
| 3               |                          | All Contractors                     |
| 4               |                          | All Contractors                     |

Head of Environmental  
Protection Group

\_\_\_\_\_

Head of Environmental  
Safety Group

\_\_\_\_\_


Head of Environmental  
within Integrated Management System

\_\_\_\_\_

<sup>1</sup> The Schedule has been developed to monitor compliance with the Construction Phase Environmental and Social Management Framework Plan and Construction Management Plan.  
According to the Regulations on Quality Control of Construction implemented by the General Contractor JSC Gazporm and approved by the Deputy Chairman of JSC Gazporm Management Board V. Markelov dated 11.06.2014.

<sup>2</sup> Specific periods and volumes of audit shall be established by specialists independently in the course of interaction between RusChemAlliance LLC and the Contractor.

Attachment No. 3  
to Regulation on Industrial Safety Compliance  
Monitoring of RusChemAlliance LLC

|  |                       | <b>Gas Processing Complex Within Ust-Luga Ethane-Rich Gas Processing Cluster</b><br><u><b>Report on the Health and Industrial Safety Inspection at the Construction Site</b></u> |          |                             |                                   |                             | <b>Date:</b><br><b>No.</b><br><b>Surname, initials</b><br><b>RusChemAlliance LLC Construction Site</b> |  |                      |  |
|---|-----------------------|--|----------|-----------------------------|-----------------------------------|-----------------------------|--|--|----------------------|--|
|   |                       | H — Occupational Health; FS — Fire Safety; IS — Industrial safety; EP — Environmental Protection   |          |                             |                                   |                             |  |  |                      |  |
| No.   | Category of violation | Date   | Location | Auditor (surname, initials) | Detected deficiencies, violations | Offered corrective measures | Responsible party (Subcontractor/ Contractor)  | Responsible person (full name, position) | Time for elimination |  |
| 1   |                       |  |          |                             |                                   |                             |  |  |                      |  |
|   |                       |  |          |                             |                                   |                             |  |  |                      |  |

Attachment No. 4  
to Regulation on Industrial Safety  
Compliance Monitoring of  
RusChemAlliance LLC

RusChemAlliance LLC  
PROPOSAL  
on elimination of Occupational Health,  
Industrial and Fire Safety Requirements Violations

\_\_\_ h \_\_\_ min \_\_\_ 20 \_\_\_

Issued to

\_\_\_\_\_  
(position, full name, name of the entity whom the proposal is issued to)

In order to eliminate the violations of the occupational health, industrial and fire safety requirements, we offer implementing the following activities:

| Item No. | Measure | Deadline | Implementation status |
|----------|---------|----------|-----------------------|
| 1        | 2       | 3        | 4                     |
|          |         |          |                       |
|          |         |          |                       |
|          |         |          |                       |
|          |         |          |                       |
|          |         |          |                       |

Proposal issued by:

\_\_\_\_\_  
signature

\_\_\_\_\_  
position, full name of the RusChemAlliance LLC representative

The person receiving the proposal to be implemented:

\_\_\_\_\_  
signature

\_\_\_\_\_  
position, full name

\_\_\_ 20 \_\_\_

RusChemAlliance LLC  
PROPOSAL  
on elimination of Occupational Health,  
Industrial and Fire Safety Requirements Violations

\_\_\_ h \_\_\_ min \_\_\_ 20 \_\_\_

Issued to

\_\_\_\_\_  
(position, full name, name of the entity whom the proposal is issued to)

In order to eliminate the violations of the occupational health, industrial and fire safety requirements, we offer implementing the following activities:

| Item No. | Measure | Deadline | Implementation status |
|----------|---------|----------|-----------------------|
| 1        | 2       | 3        | 4                     |
|          |         |          |                       |
|          |         |          |                       |
|          |         |          |                       |
|          |         |          |                       |
|          |         |          |                       |

Proposal issued by:

\_\_\_\_\_  
signature

\_\_\_\_\_  
position, full name of the RusChemAlliance LLC representative

The person receiving the proposal to be implemented:

\_\_\_\_\_  
signature

\_\_\_\_\_  
position, full name

\_\_\_ 20 \_\_\_

No. \_\_\_\_\_

**Certificate  
on suspension and recommencement of works  
performed by**

\_\_\_\_\_ 20\_\_

\_\_\_\_\_  
*(Contractor's name)*

1. The Certificate is executed together with the Contractor's Representative

\_\_\_\_\_  
*(company, works execution venue, position, full name of the representative)*

2. The Employee

\_\_\_\_\_  
*(position, full name of the employee who has detected the circumstances requiring the works suspension)*

witnessed by

\_\_\_\_\_  
*(position, full name of the accompanying persons and other employees if possible)*

3. During the audit

\_\_\_\_\_  
*(name the types of works, other circumstances during which the works suspension notification is issued)*

4. The Certificate is issued on \_\_\_\_\_ 20\_\_ at \_\_\_\_\_ : \_\_\_\_\_ because there is a threat of trauma, death, road traffic accident, accident, incident, fire, environment contamination or other circumstances that endanger the life and health of the personnel

\_\_\_\_\_  
*(underline, add as required)*

5. There have been detected violations (nonconformities) of occupational health, industrial and fire safe environmental safety requirements (indicate the violated clauses of regulatory acts):

| No. | Identified violations (nonconformities) | Regulatory act (or) the No. of the regulatory document which requirements have been violated |
|-----|---|--|
|     |   |  |
|     |   |  |

6. Works recommencement:

6.1. Conditions of the works recommencement:

6.2. Corrective actions:

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6.3. Control measures (risk management):

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7. Decision on the works recommencement made based on

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*(indicate the time, date of the decision (or the documents based on which the decision is made))*

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*(position, full name and the signature of the RusChemAlliance LLC authorized employee)*

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*position, full name and the signature of the Contractor's employee responsible for the safe works execution)*

**8. To be filled after implementation of all conditions of works recommencement:**

Registration of the works recommencement conditions implementation *(indicating the status (implemented/not implemented), date and time, surname initial, signature of the person recommending the works):*

|   |  |                         |                         |   |
|---|--|-------------------------|-------------------------|---|
| 1 | <hr/> <i>implemented/not implemented</i> <hr/> | <hr/> <i>date</i> <hr/> | <hr/> <i>time</i> <hr/> | <hr/> <i>surname, initials, signature</i> <hr/> |
| 2 | <hr/> <i>implemented/not implemented</i> <hr/> | <hr/> <i>date</i> <hr/> | <hr/> <i>time</i> <hr/> | <hr/> <i>surname, initials, signature</i> <hr/> |
| 3 | <hr/> <i>implemented/not implemented</i> <hr/> | <hr/> <i>date</i> <hr/> | <hr/> <i>time</i> <hr/> | <hr/> <i>surname, initials, signature</i> <hr/> |
| 4 | <hr/> <i>implemented/not implemented</i> <hr/> | <hr/> <i>date</i> <hr/> | <hr/> <i>time</i> <hr/> | <hr/> <i>surname, initials, signature</i> <hr/> |

All conditions implemented, works recommenced \_\_\_\_\_ 20\_\_ at \_\_\_\_:\_\_\_\_  
*(date and time of actual recommencement of works)*

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*position, full name and signature of the person verifying the implementation of the identified violations (RusChemAlliance LLC employee)*

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*position, full name and the signature of the Contractor's employee responsible for the safe works execution*







**REPORT**  
on works suspension investigation

|  |                    |          |   |
|--|--------------------|----------|---|
| <b>1. Contractor/Subcontractor:</b>  |                    |          |   |
| <b>2. Investigation period:</b>  |                    |          |   |
| <b>3. Committee:</b>   |                    |          |   |
| Committee Chairman<br><i>(full name, position)</i>   |                    |          |   |
| Committee members<br><i>(full name, position)</i>  |                    |          |   |
| <b>4. Data collection:</b>   |                    |          |   |
| Date, time of works suspension   |                    |          |   |
| The works suspended at the location  |                    |          |   |
| Full name, position of the immediate supervisor of the Contractor/Subcontractor by whose fault the works have been suspended |                    |          |   |
| <b>5. Brief description of the works suspension circumstances:</b>   |                    |          |   |
|  |                    |          |   |
| <b>6. Analysis of the works suspension root causes by 5 Why method:</b>  |                    |          |   |
| Question   |                    | Reply    |   |
| Why were the works suspended?<br><i>(answer = cause No. 1)</i>   |                    |          |   |
| Why did cause No. 1 appear?<br><i>(answer = cause No. 2)</i>   |                    |          |   |
| Why did cause No. 2 appear?<br><i>(answer = cause No. 3)</i>   |                    |          |   |
| Why did cause No. 3 appear?<br><i>(answer = cause No. 4)</i>   |                    |          |   |
| Why did cause No. 4 appear?<br><i>(answer = root cause/s)</i>  |                    |          |   |
| <b>7. Root cause (root causes) of the incident:</b>  |                    |          |   |
| A  |                    |          |   |
| B  |                    |          |   |
| <b>8. Decisions (list of corrective actions aimed to eliminate the works suspension root causes):</b>                        |                    |          |   |
| Cause  | Corrective actions | Deadline | Responsible<br><i>(full name, position)</i> |
| A  |                    |          |   |
| B  |                    |          |   |
| ...  |                    |          |   |

Commission Chairman \_\_\_\_\_  
(signature) (full name)

Committee members:  
\_\_\_\_\_  
(signature) (full name)  
\_\_\_\_\_  
(signature) (full name)