APPROVED by RusChemAlliance Order No. <u>PXA-Π/83</u> dated 20.06.2022

REGULATIONS

on involvement of fire response departments to extinguish the fires and carry out the emergency & rescue operations at the Gas Processing Complex within Ust-Luga Ethane-rich Gas Processing Cluster

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1.1. Regulations on involvement of fire response departments to extinguish the fires and carry out the emergency & rescue operations at the Gas Processing Complex within Ust-Luga Ethane-rich Gas Processing Cluster (hereinafter - the Regulations) is developed under the implementation of the provisions of Federal Law No. 69-FZ "On Fire Safety" dated 21.12.1994.

1.2. The purpose of this Regulations is to set the general principles and liaison protocol for fire response departments, created at GPC facilities construction sites (hereinafter – Project FRD), including at the construction camp areas, based on the necessity to ensure timely and effective response to fires breaking-out and emergencies development.

1.3. The Regulations shall define:

- Project FRD action planning procedure for fire extinguishing and emergency & rescue operations;

- Owner's, Contractor's rights under the implementation of fire extinguishing and emergency & rescue operations;

- arrangement procedure for ire extinguishing and emergency & rescue operations at GPC territory, including the liaison protocol and information exchange procedure for Project FRDs.

1.4. The Contractors, Subcontractors, involved in GPC implementation, as well as the Owner's business units shall comply with the Regulations.

1.5. Relevant Contractor is responsible for the Subcontractor to comply with the requirements of the Regulations.

1.6. Any deviations from the the requirements hereof, except if it is required to observe the Russian Legislation, shall be approved with the Owner.

2. TERMS, DEFINITIONS AND ACRONYMS

2.1. The following terms and definitions are used in the Regulations:

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Water body	- natural or artificial water reservoir, water stream or any
	other object, which permanent or temporary water build-up in
	has the distinctive forms and characteristics of water regime.
Owner's dispatcher	– special service, created by the Owner, aimed at coordinating
control	the activities when arranging fire extinguishing and
	emergency & rescue operations to be carried out.
Voluntary fire guard	- socially oriented public associations of fire response,
	created under initiative of the individuals and (or) legal
	entities – public association to participate in prevention and
	(or) extinguishing fires and emergency & rescue operations.
Volunteer fire brigade	– a territorial or facility-related voluntary fire protection unit,
	equipped with a fire truck and fire-technical equipment,
	participating
	in the prevention and extinguishing fires and emergency &
	rescue operations.
Owner	– RusChemAlliance Limited Liability Company
	(RusChemAlliance LLC)
Fire response	– entity
department	(-ies), regardless of their departmental identity, form of legal

	entity's incorporation, whose functions include fire prevention
	and extinguishing, as well as emergency & rescue operations.
Contractor	– an enterprise or person performing the works, rendering
	services or supplying products to the Owner on a contractual
	basis, including EPC Contractors.
EPC Contractor	- an entity, performing the set of works and services
	pertaining to engineering, procurement, construction, erection
	and other works in accordance with a Contract.
Subcontractor	– an entity, performing the works and rendering services or
	supplying the Products on a contractual basis with a
	Contractor.
Territory	– GPC construction site, infrastructure auxiliary facilities, site
	temporary facilities, as well as the land allotment adjacent
	area at the distance of 50 metres.
Response area	– part of the territory, handed over to the Contractor for GPC
	facilities construction and placing temporary site facilities,
	including the construction camps, as well as the area adjacent
	to these territories at the distance of 50 metres from the
	indicated land plots.

2.2. The following acronyms are used hereof:

emergency & rescue operations	– emergency and rescue operations.
GPC	– Gas Processing Complex within the Ust-Luga Ethane-Rich Gas Processing Cluster.
ISD	- RusChemAlliance Industrial safety department
HSE	- occupational safety, industrial safety and fire safety, and environmental protection
Project FRD	- fire response departments, created at GPC construction sites.

3. REGULATORY REFERENCE

The Regulations is developped according to the Russian legislation including but not limited to:

3.1. Federal Law No. 69-FZ "On Fire Safety" dated December 21, 1994;

3.2.Federal Law No. 68-FZ "On protection of the population and territories against natural and man-made emergencies" dated December 21, 1994;

3.3.Federal Law No 151-FZ "On Emergency rescue services and rescuers status" dated August 22, 1995;

3.4. Federal Law No. 100-FZ "On voluntary fire guard" dated May 06, 2011;

3.5. Federal Law No 99-FZ "On Licensing of Certain Activities" dated May 04, 2011;

3.6.Rules of the fire protection regime in the Russian Federation, approved by the Russian Government Decree No. 1479 dated September 16, 2020.

3.7.Fire response department field manual defining the order of fire extinguishing and emergency response operations approved by Russian EMERCOM Order No. 444 dated October 16, 2017.

4. GENERAL REQUIREMENTS

4.1.Project FRD shall be involved to extinguish the fires and carry out the related ERO, as well as to conduct ERO and other urgent operations when eliminating the accidents, disasters and any other emergency situations unconditionally and without compensation, except for the cases when the works are being done outside the response areas.

4.2. Fire extinguishing is the actions aimed at saving people, property and fire elimination.

4.3.The Contractor shall ensure the timely response by the fire fighting units to any potential accidental situation and fire at the response area.

4.4.Under any contractual (agreement) obligations the Contractor shall ensure the required actions are taken to eliminate the accidents, fires and their consequences at the Project territory, as well as the Contractor's construction camp area, including the creation of the own fire brigades, or involvement of the designated companies.

4.5. When determining the permanent stations for fire response departments, the Contractor shall keep in mind the condition that the arrival time of the fire response department brigade to the place of a potential fire on the handed-over territory (including the construction areas) shall not exceed 10 minutes.

4.6.The Contractor, Subcontractor shall assign the persons in charge for arranging the interation with the fire response departments, created or involved by the Contractor, with the similar Owner's and other Contractors Department (hereinafter – PIC) by issuing the Order. The data of the appointed person shall be communicated to the Owner as per the procedure envisaged by the agreement or the contract.

4.7.The persons, involved into fire extinguishing and ERO shall be on duty all 24 hours composed as per the forces and resources engagement plan, developed in accordance with clause 7.4. of the Regulations.

4.8.Equipment and the Project FRD staff shall be located in a heated fire station building.

4.9. The Owner is entitled to carry out inspect the duty arrangement in any Project FRD without prior notice at any time.

5. REQUIREMENTS TO THE CONTRACTORS FOR FIRE EXTINGUISHING AND ERO

5.1. According to Federal Law No. 99-FZ "On Licensing Certain Activities" dated 04.05.2011 Contractor engaged in fire extinguishing and ERO as a fire response department shall have a license for the right to carry out fire extinguishing activities in localities, industrial facilities and infrastructure facilities and comply with the requirements of the Regulations on Licensing Fire Extinguishing Activities in localities, at production facilities and infrastructure facilities approved by the Russian Government Decree No. 1131 dated July 28, 2020 (hereinafter – the Licensing Regulations).

5.2. It is allowed to involve Voluntary fire guard, arranged as a voluntary fire brigade, to extinguish fires. At the same time, these FRDs shall comply with the requirements of Federal Law No. 100-FZ "On Voluntary Fire Guard" dated May 06, 2011.

5.3. The Project FRD shall be equipped with fire trucks, mobile fire extinguishing equipment, primary fire extinguishing equipment, communication equipment, fire extinguishing agents, rescue equipment, fire equipment, personal protective equipment for firefighters, self-rescue means for firefighters. The number and type of firefighting means, as well as fire extinguishing agents shall be defined in accordance with the fire safety regulatory acts and regulatory documents.

6. REQUIREMENTS TO THE PERSONS, ENGAGED IN FIRE EXTINGUISHING AND ERO

6.1. Persons, involved fire extinguishing and ERO shall comply with the requirements of paragraphs «г», «д», «е», clause 3 of the Licensing Regulations.

6.2. When creating voluntary fire brigade followed by its involvement in operations, only natural persons can be engaged, who shall comply with the requirements of Federal Law No. 100-FZ "On Voluntary Fire Guard" May 06, 2011 and be registered in the Volunteer Firefighters Register.

6.3.Persons, involved fire extinguishing and ERO shall be provided with the firefighter personal protective equipment, firefighter self-rescue equipment.

6.4 Persons engaged in fire extinguishing and ERO shall have medical records confirming the engaged personnel gets no any medical contraindications, according to the requirements of Russian Labor Ministry Order No. 988n "On approval of the list of harmful and (or) hazardous production factors and works, which require mandatory preliminary medical examinations to be undergone prior employement and periodic medical examinations" dated December 31, 2020.

6.5 The number and skilled personnel engaged in performing the Project FRD activities shall comply with the requirements of Russian Legislation.

7. PLANNING ARRANGEMENT FOR FIRE EXTINGUISHING AND ERO

7.1. Preliminary action planing documents for fire extinguishing and ERO shall be developed to organize fire extinguishing and ERO on the GPC territory.

7.2. Under action planning for fire extinguishing as well as ERO, the Contractor shall develop and get the Owner's approval for the following documents:

- Regulations on ensuring readiness and response to accidental and other emergency situations;

- Training procedure;

- The personnel evacuation procedure in case of accident, fire and emergencies.

7.3. Personnel training to respond to the accidental and other emergency situations is carried out by conducting no less than 2 (two) trainings related to possible accidents and other emergency situations per year.

7.4. The Owner shall develop and approve the Project FRD resources engagement plan, to ensure fire elimination requiring the engagement of additional forces and resources.

7.5. The Contractor shall provide the Owner with the information on responding forces and resources to be included in the Project FRD resources engagement plan within one month from the moment of FRD deployment at the GPC territory.

7.6. Resources engagement plan shall be developed within 2 months from the moment of FRD deployment by the Owner or the Contractor at the GPC territory.

7.7. Resources engagement plan shall be updated in case if the quantity of the FRD at the area of their locations (if it impacts on the response time), staff quantity or the number of

vehicles gets changed based on the information provided by the Contractor. The proposals to update the fire response resources engagement plan shall be submitted by the Contractor within 1 (one) month from the moment of change.

7.8. All ERO contractors shall be familiarised with the Approved Project fire response resources engagement plan within 5 business days.

8. THE PROCEDURE FOR ENGAGEMENT OF RESOURCES FOR FIRE EXTINGUISHING AND THE RELATED ERO

8.1.The Owner shall create its own dispatcher service within its own fire department to coordinate activities when arranging fire extinguishing and ERO.

8.2.Immediate response on all the fire announcements at the response area shall be ensured by the corresponding Contrator's FRD. The Contractor's FRD engagement for fire extinguishing and ERO beyond the response area shall be carried out either under the direction (instruction) of the Manager or the Contractor's service dispatcher on duty. Procedure for resources engagement beyond the FRD response area shall be defined under the interaction agreement, arranged between the Owner and the corresponding Contractor (Subcontractor).

8.3.FRD arrival to the fire location shall not exceed 10 minutes.

8.4.To ensure timely response the Contractor shall organize 24 hours duty of the Contractor's FRD and dispatcher service.

8.5.The Contractor's dispatcher service shall ensure the fire alarms are received on the response area, as well as interact and communicate the information to the Owner's dispatcher service.

8.6. The Owner and the Contractors shall ensure unconditional and immediate response of the Project FRD according to the Project Fire resources engagement plan on the territory or outside of it as defined by the Regulations and Interface Agreement.

8.7.Information on messages received by the Contractor's FRD or dispatcher office shall be handed over to the Owner's dispatcher office.

8.8.Water resources intake (extraction) for fire extinguishing is allowed from any GPC intrasite water bodies without any permission, free and in a volume, required for the fire extinguishing.

8.9.Resources management at fire location and ERO is performed by the Contractor's FRD chief on-duty officer (according to the Response area), who arrived to the fire location.

8.10.Resources management at fire location and ERO on the territory located outside the Contractor's response area is done by the Owner's chief on-duty officer.

8.11.In case of insufficient forces and resources for fire extinguishing the officer engaged in fire extinguishing can take a decision on engagement of additional forces and resources according to the Project Fire Response resources engagement plan.

8.12.In case of the Owner's fire response department engagement the fire extinguishing and ERO management is handed over to the Owner's fire response duty officer. The first order made by the on-duty FRD officer arrived is considered to be the moment of fire extinguishing management has been taken over by him.

8.13.Arrangement of fire extinguishing and ERO by the FRD including fire guard action plan during the fire extinguishing and ERO, the basic management and response philosophy of FRD is carried out under FRD fire extinguishing regulations defining the fire fighting and emergency & response operations, approved by EMERCOM Order No. 444 dated October 16, 2017.

9. **RESPONSIBILITY**

9.1. If any provisions of the Regulations are violated, the Contractor shall develop and approve the remedial action plan with the Owner.

9.2. If there are multiple violations of the Regulations provisions, or the remedial action plan is not fulfilled on time, as specified in clause 9.1 of the Regulations or in case of breaching para. A, B and (or) C, clause 3 - Licensing Regulations the Contractor shall substitute the Fire-fighting Contractor upon the Owner's notification.

9.3. In case if FRD units refuse to extinguish fires and carry out ERO or untimely engage the forces and resources envisaged by the Regulations, the Contractor shall substitute the Fire-fighting Contractor upon the Owner's notification.