

AVAILABLE LANGUAGE: EN

Health, Safety, Environmental Requirements

03	31/07/2023	Updated according to LL and other outputs shared globally	C. Chiulli F. Bassi R. Troiani S. Alliprandi		A. Paladino	D. Susca
02	28/01/2021	HSE Terms alignment and extended to Thermal			A. Paladino	V. Moro
01	22/11/2018	Updated with Annexes and Bill of Quantities library (Valid			A. Lemme (/HSEQ) S. Martinez (/HSEQ)	M. Galainena De Carlos (/HSEQ)
00	30/09/2014	First issue			A. Lemme (/HSEQ)	A. Lemme (/HSEQ)
REV.	DATE	DESCRIPTION	PREPARED by	COLLABORATORS	VERIFIED by	VALIDATED by
PROJECT / PLANT		CODE				
		Region	Function/U	Type	Number	Version
		EGP&TGX_ALL	QSE	GS	001	03
CLASSIFICATION	PUBLIC COMPANY		CONFIDENTIAL RESTRICTED		UTILIZATION SCOPE	
This document is property of Enel S.p.A. It is strictly forbidden to reproduce this document, in whole or in part, and to provide to others any related information without the previous written consent by Enel S.p.A.						



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

2 di/of 49

INDEX

FOREWARD.....	3
1. SCOPE	3
2. RECITALS.....	4
3. DEFINITIONS AND ACRONYMS	5
4. LANGUAGE	5
5. GENERAL OBLIGATION ON OCCUPATIONAL LAW, HEALTH, SAFETY AND ENVIRONMENT	5
6. HEALTH&SAFETY PLAN.....	6
7. ENVIRONMENTAL PLAN	17
8. HSE ORGANIZATION AND RESPONSABILITY	20
9. PROVISIONS CONCERNING FIRST AID, FIRE PREVENTION AND EMERGENCY MANAGEMENT	24
10. HSE AWARENESS AND COORDINATION	25
11. VEHICLES, MACHINERY, EQUIPMENT, TOOLS AND MATERIALS	31
12. HAZARDOUS SUBSTANCES (MATERIALS MANAGEMENT)	34
13. PROTECTION OF THE ENVIRONMENT	35
14. REPORTING	38
15. CONTRACTORS AND SUBCONTRACTORS	39
16. SPECIAL REQUIREMENTS FOR HIGHER LEVEL RISK ACTIVITIES	40
17. DOCUMENTATION AND INFORMATION TO BE PROVIDED BY THE CONTRACTOR	46
18. INSPECTION AND MONITORING	47
19. CONSEQUENCES OF BREACHES REGARDING HEALTH, SAFETY AND ENVIRONMENTAL REQUIREMENTS	48
20. SECTION – ANNEXES	48
21. ENEL REFERENCES	48



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

3 di/of 49

FOREWARD

This General Technical Specification about Health, Safety, Environmental Requirements (hereinafter “**HSE requirements**”) consists of a descriptive technical document (including technical attachments) and some of its voices are also listed in the Bill of Quantities requested in the Purchase Order Request spreadsheet. The technical specification applies to any kind of work as maintenance in O&M activities or new construction and decommissioning, services and supplies within EGP&TGX (excluded pure supply).

This document is also used during project design phase, to define the information on significant health safety and environmental common services that the Contractor and Subcontractors (including suppliers) shall address to during the activities execution within EGP&TGX Business Line.

Within EGP&TGX the HSE Requirements will be used in order to plan an appropriate distribution of the common services among the various Contractors in order to receive appropriate offer avoiding extra cost, double service or over/sub-dimensioning services.

This document shall be implemented and applied to the extent possible within EGP&TGX Business Line of Enel Group and in compliance with any applicable laws, regulations and governance rules, including any stock exchange and unbundling-relevant provisions, which in any case prevail over the provisions contained in this document.

Furthermore the Enel technical notes for the activities attached in this document constitute the reference for the activities performed by Contractors in the Worksites. In addition, upon specific request from the Contractors, ENEL makes available its internal documents (Policies, Operating Procedures, Guidelines, etc.).

These HSE requirements and the contractual price list specify the minimum requirements requested by Enel in order to be in compliance with the **HSE Terms** (HSE Contract General Conditions) attached to the contract. In case of contradiction between the two documents the HSE Requirements shall prevail.

1. SCOPE

The purpose of the HSE requirements is to provide Contractors and Subcontractors with essential information on significant Health, Safety and Environmental aspects that Contractor and other Subcontractors shall address during provision of their services for Construction of a Work Site or Operation & Maintenance services or decommissioning activities. Considering the HSE terms prescription/request the Contractor and Subcontractors shall use these HSE Requirements to design the projects (if any) or services considering the risk assessment, the H&S Plan and Environmental Plan, to list the costs of health and safety measures, to monitor and manage the HSE issues, to maintain a health and safe Work Site and to ensure the respect of the environment. Each requirement included in this HSE Requirements must be implemented when the specific risk occurs. The HSE Requirements are integral part of the Contract and, if the conditions are not met by Contractors and Subcontractors, Enel – in its sole discretion – has the necessary authority to apply, for each breach on HSE in force at each time, the penalties as provided for in the HSE Terms.

Contractor shall require Subcontractor(s) to previously accept, in writing, the HSE Terms and this HSE requirements and have to present relevant supporting evidence to Enel. The Contract between Contractor and Subcontractors shall have same HSE contractual conditions included in contract between Enel and Contractor.

All the conditions and requirements detailed in the present document apply also to the possible further subcontracting level.



ADDED VALUE: This document aims at ensuring Contractors minimum requirements on Health and Safety and Environmental issues in all EGP&TGX perimeter.

This document shall be implemented and applied to the extent possible within EGP&TGX Business Line of Enel Group and in compliance with any applicable laws, regulations and governance rules, including any stock exchange and unbundling-relevant provisions, which in any case prevail over the provisions contained in this document.



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

4 di/of 49

Application Field (excluding pure Supply only)

Chapter	All tech Supply on site	Civil and Electrical BoP	Electrical Work Commissioning	Crane and Erection	Services	Transport with download/upload	External Consultant Owner Engineer	Maintenance activities
1	X	X	X	X	X	X	X	X
2	X	X	X	X	X	X	X	X
3	X	X	X	X	X	X	X	X
4	X	X	X	X	X	X	X	X
5	X	X	X	X	X	X	X	X
6	X	X	X	X	X	X	X	X
7	X	X			X	X		X
8	X	X	X	X	X		X	X
9	X	X	X	X	X			X
10	X	X	X	X	X	X	X	X
11	X	X	X	X	X	X	X	X
12		X			X (only if in SCOPE OF WORK)			X
13	X	X			X	X		X
14	X	X	X	X	X	X	X	X
15	X	X	X	X	X	X	X	X
16	X	X	X	X	X	X	X	X
17	X	X	X	X	X	X	X	X
18	X	X	X	X	X	X	X	X
19	X	X	X	X	X	X	X	X
20	X	X	X	X	X	X	X	X
21	X	X	X	X	X	X	X	X

2. RECITALS

HSE is part of Enel's culture and it must be the distinctive trait of the conduct of everyone working in Enel worksites

All the initiatives carried out are aimed not only at ensuring the compliance of Law, but also at establishing top standards regarding safety occupational health at work and environmental protection in all the countries in which Enel operates, also by spreading a significant amount of resources devoted to HSEQ and by sharing the best global practices.

Furthermore, according to EGP&TGX HSEQ Integrated Management System, which refers to ISO 45001, ISO 14001 and ISO 9001, the continuous improvement is part of our activities also including Contractors and Subcontractors personnel and behaviors.

All people shall be informed about EGP&TGX IMS Policy.

Therefore, EGP&TGX is committed to certain actions and expects Contractors to cooperate and abide to the same:

- integrate health and safety at work and environmental protection issues into their decision-making and managing activities;
- adopt technologies and practices that produce a continuous improvement of conditions regarding health and safety at work and internal and external environment;
- take all the necessary actions to eliminate risks of health and safety that can cause Accidents;
- take all the necessary action to avoid or reduce pollution by preventing Environmental Events, controlling the materials that are used, the waste that is generated and the observance of the established operating practices;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

5 di/of 49

- develop, through adequate information and training programs, the skills of the employees who perform different activities, under normal conditions and in situations of danger or emergency, in order to raise the awareness concerning their role and their potential, as regards both the prevention of risks in the field of health and safety, and the achievement of objectives and results of environmental performance;
- promote and support an open dialogue with citizens, organizations and administrations on the effects that their activities produce on the communities and the environment, in order to favor protecting and enhancing activities aimed to improving the internal and external health and safety and environmental protection;
- define yearly specific and measurable objectives and assess their actual achievement by continuously monitoring the results obtained.

3. DEFINITIONS AND ACRONYMS

Defined terms not defined below have the same meaning provided for in the HSE Terms.

- Active Safety System: refers to any proximity safety alert device that prevents and helps to avoid collisions and accidents;
- BoP: Balance of Plants;
- Contractor for Site Camp security: is the Contractor responsible dedicated for the construction site camp security service and Work Site access procedure;
- CPE: Collective Protections Equipment, commonly referred to as "CPE" include devices that serve to protect from a specific hazard several individuals simultaneously and should always be implemented where the area to be secured is frequently used;
- Environmental Officer: means officer in charge of environmental compliance appointed by Contractor with the professional background;
- E&C: Engineering and Construction Unit and Design and Execution Unit of HGT EGP&TGX
- HS Officer: means the officer in charge of HS compliance appointed by Contractor with the professional background;
- HSE Cost: means the cost of the Health, Safety and Environment measures during the construction or operation & maintenance process;
- HSE Coordinator: means the person in charge of all HSE compliance appointed by Contractor with the due professional background;
- H&S Plan: means Health and Safety risk assessment and management plan;
- Environmental Plan: Work Site specific executive plan developed to ensure compliance with in force legislation and appropriate environmental management practices during project's construction and/or maintenance services
- IMS: Integrated Management System;
- Isolated Work Site: (for Complex Work) any Work Site where the distance from cities justify the presence of dormitory on the Work Site;
- O&M: Operation and Maintenance units of EGP&TGX, and in particular O&M unit of EGP&TGX and O&M units within HGT EGP&TGX
- POR Purchase Order Request
- PPE: Personal Protections Equipment, commonly referred to as "PPE", is equipment worn to minimize exposure to a variety of Hazards. Examples of PPE include such items as gloves, foot and eye protection, protective hearing devices (earplugs, muffs) hard hats, respirators and full body suits.
- SoW Scope of work

4. LANGUAGE

The original version of this HSE Requirements is in English unless differently provided in the Contract by the Parties. In the case of conflicts among the original version and the translations into other languages, the original version shall prevail.

5. GENERAL OBLIGATION ON OCCUPATIONAL LAW, HEALTH, SAFETY AND ENVIRONMENT

General and Specific obligations are described in HSE Terms document.



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

6 di/of 49

HSE laws, for execution of works or services, require actions to protect those at work on site and external stakeholders who may be affected. Could be local legal requirements concerning notifications, risk assessment, Inspection, Reports, H&S Plans, Environmental Plan, Emergency Plan, etc. that could be also produced or submitted to the competent HSE authorities before the construction phase begins.

However, following three documents are mandatory for the organization of an Enel construction/O&M site: H&S Plans, Environmental Plan and Emergency Plan.

In any case, this mandatory documentation, ensure health, safety and environment aspect management throughout the project, facilitating cooperation between contractors.

Documents shall be submitted to Enel, at least 2 weeks before the start of the activities, for review and approval and, once accepted and signed by both, shall not be amended without prior consultation and acceptance by Enel.

6. HEALTH&SAFETY PLAN

In addition to what prescribed at HSE Terms Chapter 6 "Health&Safety Plan", the H&S Plan shall contain, or is a collection of all the information required by the applicable Law, like:

- Site Description;
- Project Description;
- Site Organization Chart;
- Description of HSE Coordinator, detailing for each one the duty and the responsibility;
- Managing of what required by this HSE requirements (i.e.: Training program, Communication system, Facilities, PPE);
- Emergency plan (to be updated with the progress of the activity);
- Training to all workers on the HS Plan, Environmental Plan and Emergency Plan contents;
- Health & Safety Costs.

Contractor and the Subcontractors shall provide all the documentation required by Law, update it whenever the activities change and keep a copy at Site, or immediately available to an inspector or during an Enel inspection.

The Contractor shall deliver to Enel, prior to commencement of Contract activities (and keep updated, for the whole Contract duration), specific Health and Safety risk assessment and management plan on all the activities concerned with Contract execution, in particular the following:

- Site Description: this should be a concise and general description of the nature, extent and locations of the work, clearly differentiating the existing works and new works. Details of the engineer, designers, contractors personnel (including Subcontractors of any tier) and major suppliers shall be listed including names, addresses, contact numbers, and scope of work; Contractors shall provide a statement covering the design criteria or design assumptions used, as they may affect the health and safety in operating, maintaining, repairing, cleaning, alteration or demolition of the works and protection of the environment. This statement shall include details on how foreseeable cleaning, maintenance and repair is to be carried out; details of features in the design to enable persons to work safely; and details of any residual Hazards in the completed work which will need taking into account in operating, maintaining, repairing, cleaning, alteration or demolition of the works;
- Safe Work Methods Statement: Based on the Risk Assessment, Contractor shall provide method statements for all project activities. Such method statements shall detail all the activities and works sequences and explanation of supporting arrangements (permanent or temporary) required during the execution. Furthermore, in particular Contractor has to provide a list of risks associated to the specific activities, any certifications and special training for workers and the list of required PPE to be used;
- Lifting Plan: A specific plan developed by competent person for all complex hoisting/transporting operations. Plan has to include for lifting: dimensions and/or weight of the load, simultaneous use of apparatus, use of specific tools, as a minimum;
- Emergency Plan;
- Equipment and Materials: Contractor shall list each equipment and material used. Significant health, safety and environmental Hazards shall be identified and supplier's material safety data sheets included;
- Utilities: The designer and Contractors shall provide information on utilities, confirming locations



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

7 di/of 49

and types cross-referenced to other documentation provided;

- Other Relevant Information: Designer and Contractor shall provide copies of any relevant information on the original Work Site and access such as investigation results, project installation certificates, commissioning results and certificates as generally required under the contract documentation;
- Personnel Medical surveillance and prescriptions (if any);
- Personnel Appointments and Trainings.

Aside from the documentation listed in the HSE Terms, if so required by Enel, that Contractor shall also present the:

- Storm Water Management Plan (SWMP);
- Erosion Management Plan.

which will be an integral part of the Environmental Plan, but whose specific risks to the health and safety of people must be assessed in the HS Plan

For Operation and Maintenance Activities the O&M manuals shall be provided in accordance with contract requirements.

However, the designer shall detail the maintenance requirements and procedures to be followed to carry out such maintenance safely, without risk to health and the protection of the environment. Specific information shall be given on the safety features and items provided to ensure health and safety and the protection of the environment.

The designer will be required to confirm the acceptability of previous O&M documentation provided by Contractor.

6.1. INTERFERENCES MANAGEMENT

The H&S Plan and the Emergency Plan must be updated with all relevant information coming from all the Contractors and it must include the management of interferences among activities/workers/Companies, and must provide to all initiatives to avoid or reduce any kind of risk related to interferences.

At least weekly, Contractor's responsible have to hold a HSE meeting with Enel representatives to manage the coming activities planned for following weekly plan. The report of these meetings must be shared between all participants and forwarded to Enel and to the other Contractors responsible immediately. Enel will attend the meeting to support the coordination between all Contractors.

However, before starting daily activities, with interference between several Contractors or across teams of the same Contractor, has to be scheduled a pre-job check meeting involving all Foreman and Safety Officers of Contractors so that:

1. Identify correctly risks of interference by each safety officers;
2. Ensure the identification and application of the prevention, protection and coordination choosing the CPE and/or PPE equipment, device, listed and quoted in the Interference Costs sheet in order to manage properly the interference risks;
3. Identify a single person of the team to manage human-machine interactions during activities.

At the end of pre-job check meeting, Contractor representative has to report the meeting content through paper or more simply with media tools (e.i.: video by smartphone), and sharing it with Construction and HSE Team.

Contractor's representatives on the Work Site shall call HSE meetings if needed: Contractor and Subcontractors must attend the meetings.

Contractor for cranes and heavy vehicles must provide and install on site an ACTIVE SAFETY device to minimize the likelihood of accidents, assisting the Operator/Driver during critical situations to prevent the occurrence of collisions or accidents in real time. This system is also recommended for all vehicles in case of Isolated Work Site and Complex work.

The Active Safety System shall be able to:

- 1) minimize the likelihood of accidents between workers and vehicles;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

8 di/of 49

- 2) assist the vehicle driver during critical situations to prevent the occurrence of collisions between vehicles and accidents with workers in real time;
- 3) monitor in real time the presence of personnel in one or more operating area particularly dangerous;
- 4) provide all the data to a central platform;
- 5) review Traffic Management Plan.

6.2. HEALTH&SAFETY RISK ASSESSMENT

Contractor and the Subcontractors performing any work shall, before to start and during any activity, perform risk assessments which have to be performed by competent personnel (risk assessor) appointed in writing by Contractor. The risk assessments shall be the nodal point of the contractor's H&S Plan and shall include, in addition to the conditions and risks listed on article the HSE Terms:

- ✓ The analysis and evaluation of the risks and hazards identified;
- ✓ A documented plan of safe work procedure to eliminate, mitigate, reduce or control of the risks and hazards that have been identified;
- ✓ A monitoring plan;
- ✓ A review plan.

These risk assessments will identify the hazards, risks and mitigation measures to reduce the risks. The method statements will describe how these tasks will be performed to implement the necessary mitigation measures. The risk assessor has to identify the Hazards with risk to personal injury and/or property damage that must be the catalyst for providing controls and preventive measures. Once a Hazard has been identified, the person in charge of the risk assessment shall provide the measures to eliminate or mitigate the hazard. Hazards shall be eliminated when is possible and can be minimized through awareness training, engineering controls, use of personal protective equipment (PPE) and/or monitoring devices.

On place, foreman must use the risk assessment record by comparing the hazards identified daily before the work on site begins and the mitigation plans developed to control these Hazards. Foreman shall monitor existing controls and preventive measures to insure accuracy and usage. Foreman shall continue to compare the actual work to the assessment allowing for changes in the assessment when change is occurred. Workers shall be familiar with the risk assessment, use the existing controls and preventive measures while performing the tasks, and provide input to their Foreman to ensure that risk assessment procedure reflects all Hazards identified and is reviewed when needed.

Risk assessment must be reviewed formally whenever an HSE event happens. The document shall be submitted to Enel, for review and approval.

These requirements must be considered as minimum requirements. If local Law is more restrictive, it prevails on what indicated in this document. For further detail, consult "Occupational Health & Safety Risk assessment".

6.2.1. Heatstroke

Heatstroke is a condition caused by body overheating, usually because of prolonged exposure to or physical exertion in high temperatures. This most serious form of heat injury, heatstroke, can occur if your body temperature rises to 104°F (40°C) or higher. The condition is most common in the summer months.

Heatstroke requires emergency treatment. Untreated heatstroke can quickly damage your brain, heart, kidneys and muscles. The damage worsens the longer treatment is delayed, increasing your risk of serious complications or death.

6.2.2. Ultra Violet Protection

In case of evaluation demonstrates a specific high risk on site and, anyway, if required by Enel, Contractor shall provide and install on site a meteorological forecasting system that also includes the monitoring of UV Index.

To evaluate how protect outdoor workers from UV radiation is possible refer to the following documents:

- ILO/ICNIRP/WHO 14/2007 "Protecting Workers from Ultraviolet Radiation"
- "ICNIRP statement on protection of workers against ultraviolet radiation".

6.2.3. Medical surveillance



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

9 di/of 49

Contractor and Subcontractors shall ensure that all their workers have a valid medical certificate specific for the activities to be performed and issued by a doctor for occupational health and safety, in particular the following:

- ✓ If project is a wind farm, all personnel working inside a turbine shall be climb and rescue trained within the last year including a medical fit for duty approval and climb test (e.i. GWO Training);
- ✓ Contractors performing sandblasting and painting operations shall have a medical surveillance program in place to monitor employee's blood level exposure to lead.

A copy of the relevant documentation that attests the effective medical surveillance must be available on Work Site.

6.2.4. Risk Pandemic by severe acute respiratory syndrome ex coronavirus (SARS)

For this risk is necessary identifies three different levels of alert to be applied to the various sites in relation to the evolution of the spread of SARS and the possible presence of positive workers at EGP&TGX sites:

- Pre-alert: a level that characterizes a site at lower risk of infection and where these conditions (including alternatives) occur:
 - o Proximity to a 'Red Zone';
 - o Located in 'macro-areas' where there is a high number of SARS positive subjects;
 - o High number of on-site workers (>200).
- Alert: level characterizing a site at high risk of infection: site located in "Red Zone" or similar identification or with a "Suspicious Case" on site
- Emergency: level that characterizes a site at high risk of infection with at least one SARS positive case within the site with potential impacts for business continuity. This level remains as long as the potential impacts for business continuity exist.

"Suspicious Case" means a person with a fever (body temperature >37.5°) or in quarantine because they have been in close contact (contact for more than 15min and at a distance of less than 2m) in the last 14 days with a SARS positive person.

Sites that do not fall within the above case history are considered to be at a level called "Attention Status".

The alert status of each single site is constantly updated according to the evolution of the SARS spread and the changes in the areas affected by special measures identified by the competent authorities.

As a preventive and precautionary measure, since the beginning of the SARS emergency, all E&C sites have been placed in a "Pre-alert state" in order to rapidly implement most of the risk reduction actions.

6.2.4.1. Action Plan (Risk Mitigation)

Depending on the level of alert identified for each individual site, specific actions have been defined for the protection of personnel operating within EGP&TGX perimeter. This action plan covers the following three areas of intervention:

- Personal protection: measures to protect personnel to prevent and combat the spread of SARS;
- Site management methods: measures on the structure of the individual site to mitigate the risk of possible transmission of the virus;
- Work organization: measures aimed at minimizing the presence of staff on the same work front and in general at segregating work areas.

The actions identified are functional to have an increasing incisiveness as the level of alert increases.

The following list of actions must be understood as indicative, illustrative and not exhaustive, since the peculiarities of each site and the evolution of the phenomenon are such that they do not allow a detailed definition of the individual actions.

It will be the task of the HSEQ E&C staff, in constant contact with the Enel site staff, the Project Management and the Safety Coordinators in charge during the execution phase, to define and update the following with detailed actions site by site.

- **Pre-alarm level**



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

10 di/of 49

- (a) In line with the issuing local law, the use of protective PPE (masks, gloves, goggles) is mandatory at all times and in any case when workers have to work at a distance of less than 1 meter for activities that cannot be postponed and cannot be carried out in alternative ways.
In general, personnel must work in distant and separate spaces. Any interactions must in any case respect a distance of at least 2 meters. The workers' teams, where possible, will be divided into sub teams that will have to operate with the same criteria of separation and distance indicated above (distance greater than 2 meters).
The coordination and supervision activities of Enel personnel must be carried out by interacting at a distance of at least 2 meters. As far as the above interactions are concerned, only if strictly necessary, they can take place at a distance of less than 2 meters only for extremely short times (always and in any case less than 15 minutes total cumulative exposure limit). In relation to the time limit (15 minutes) mentioned above, it is necessary to consider the total daily exposure limit as strictly necessary.
- (b) These measures will have to be implemented when accessing the site:- Self-certification/declaration by all persons entering the site regarding their health condition (self-diagnosis) and origin in case of regulatory restrictions based on the same (to be repeated at least every Monday morning or in case of changes in the perimeters);
Temperature measurement for all persons entering the site. The entrance to the site must not be allowed to symptomatic persons: the way in which these persons are managed must be defined in the Emergency Plan of each site.
- (c) Organize information and dissemination sessions with site staff on the actions to be implemented for risk management due to SARS.
- (d) Verify the updating of the documentation relating to the safety of the site (Safety and Coordination Plan, Operational Safety Plans, Emergency Plan,...) by the parties required by law with the inclusion of Biological Risk, Contamination Risk and management of "Suspicious Cases".
- (e) The staff shall carry out the direct exchange of deliveries between teams/workers only when strictly necessary, keeping a distance of more than 2 meters and where not possible respecting the rules indicated in the previous point (cumulative daily exposure time less than 15 minutes).
- (f) The reduction of activities by Enel personnel on site and external supervisors/technical consultants must be evaluated and applied, as far as compatible with maintaining Business Continuity.
- (g) A re-planning of on-site activities must be evaluated and applied in order to reduce the number of workers, new contractors/subcontractors, suppliers and to postpone activities that are not essential to maintain Business Continuity.
In this vision, changes in shifts must be evaluated in order to reduce the number of teams/workers on each work front.
- (h) Partitioning of common rooms, canteens, changing rooms and vehicle management.

Depending on the number of staff, the common areas should be subdivided where possible in order to avoid close presence, applying physical and/or temporal separations; by way of example:

- Meals carried out, if in the presence of suitable spaces, at a mutual distance of more than 2 meters both in the case of premises inside the site and in external catering premises
- If not possible point above, meal delivered to be picked up independently from identified delivery point
- Site entrances staggered in order to limit the presence in the common areas, passageways and changing rooms. Alternatively, do not use the locker rooms and prescribe the wearing of work clothes in your own home
- Organize work breaks ensuring the safety distance defined above and avoiding the presence of staff in closed places
- Pay particular attention to the sleeping arrangements of both Enel personnel and the Executing Companies, indicating the requirement to avoid common rooms



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

11 di/of 49

and crowds.

- Reorganize mobility by limiting vehicle sharing, avoiding the common use of vehicles between Enel staff and third parties, reducing the number of occupants inside the vehicles both on site and off site and applying the requirements of the first point
 - Avoid interactions between staff, avoiding the simultaneous use of internal access and mobility routes (lifts, hoists, etc.) and preventing the presence of staff at common meeting points.
- (i) Limit meetings in physical presence (including the exchange of deliveries), which must in any case be held at a safe distance of 2 m and encourage, where possible, the use of alternative means such as telephone, video conference, etc. to carry out the meetings (e.g. daily operational meetings).
- (j) Sanitization of workstations and shared devices (PCs, mice, keyboards, smartphones, PDAs) at every start of the day by Enel staff, using disposable wipes and disinfectants based on chlorine (1%) or alcohol (> 70%).
- (k) Increased frequency of sanitation / ventilation of common areas (dressing room, refectories, bathrooms) and shared workstations (Meeting Rooms, Offices, ...)
- (l) Segregation of work areas between E&C staff, External Companies and, if any, O&M personnel.
- (m) When possible, identify a specific area dedicated to external suppliers where access can be limited to indispensable workers and where the frequency of sanctions/ventilation can be increased.

Perform daily audits of the site and common areas:

- Check the hygienic conditions of the site, toilets and common areas;
- Frequently sanitize air conditioner filters, if in use;
- Ensure the presence of soap and water in the bathrooms;
- Ensure maximum dissemination and presence of information/communication material on SARS.

- (n) Create a dedicated SARS emergency team at each site to speed up the application of law enforcement actions and monitor their effectiveness.

The team is made up of at least: Site Manager/Security Coordinator during Execution/Managers identified by the Executing Companies.

The team must update daily, monitor the application of the actions and take action in the management of "Suspect Cases" in line with what is indicated in the Emergency Plan.

- **Alarm level**

The following actions shall apply in addition to those already identified for the PRE-ALARM level.

- (o) In case of identification of a "Suspicious Case" as defined in Section 6, the following actions must be implemented:

- Suspension of work throughout the site or in the work area of the "Suspect Case" for at least 1 day in order to:
 - Reunite the SARS Site Team
 - Make a list of persons who have been in close contact with this 'Suspicious Case'.
 - Check and if necessary sanitize/ventilate the work areas concerned
 - Define subsequent actions
- Quarantine the "Suspicious Case" and the people who have been in close contact
- Identify additional actions in order to be able to continue with the site activities

- **Emergency level**

The following actions shall apply in addition to those already identified for the ALARM level



- (p) Evaluate the complete suspension of site activities, preceded by actions to make the site secure

6.2.4.2. PPE USE AND FURTHER HEALTH PROTECTION MEASURES

The indications reported are applied - where applicable - during the performance of the work activity, in addition to what is prescribed by the operating instructions and working methods applicable in the ordinary activity.

In particular, in some cases the use of specific PPE functional to limit and prevent the possible spread of SARS is prescribed.

6.2.4.2.1. Protection mask FFP2 or FFP3

The protective masks, complying with EU Regulation 2016/425, CE marked and protection class FFP2 or FFP3, are Personal Respiratory Protective Equipment. They are made with special internal filters that can provide valid protection, not only from dust and particulate matter, but also from biological agents such as bacteria and viruses. The face filters are made up of different layers of filtering material through which the air you breathe passes, while the air that is exhaled is released into the environment through special valves.

How to use the masks: an important factor to ensure proper protection is the adherence on the face. There must be no gaps that allow the passage of dust particles or aerosols, otherwise protection is not guaranteed.

To remove them from the face, it is recommended to remove them by holding them by the laces, taking care not to come into contact with the front exposed to the environment which could release contaminated particles, in any case in full compliance with the manufacturer's instructions.

It is forbidden to exchange the mask used between different operators.

The used mask must be disposed of by collecting it in a plastic bag to be kept sealed for subsequent delivery in a suitable container.

It is important that the following rules of behavior are observed:

1. avoid any contact between potentially contaminated PPE and face, mucous membranes or skin;
2. PPE should be disposed of in dedicated containers;
3. remove the mask by handling it from the back and dispose of it in the container;
4. always practice hand hygiene with specific detergents or alcoholic solutions after removing the mask.

6.2.4.2.2. Disposable gloves

Disposable gloves, complying with EU Regulation 2016/425, CE marked, made of latex or nitrile, are Personal Protective Equipment that avoid contact of the skin of the hands with potentially contaminated surfaces.

Like the masks, the gloves must also be disposed of after use in the situations of risk foreseen.

If it becomes necessary to wear other normally supplied PPE gloves (e.g. insulating gloves, work leather gloves) during the activity, disposable gloves, if already worn, must be removed.

How to use disposable gloves: wear one glove at a time in order to protect the hand and fingers from contact, even slight, with potentially contaminated surfaces or objects.

The gloves must be removed with particular care: first remove one glove and then the other by turning those inwards and taking care not to touch the outer surface of the glove with the hand, especially the fingers, in order to avoid contamination.

Disposal of used disposable gloves must be made by collecting them in a plastic bag to be kept sealed for subsequent disposal in a suitable container.

It is important that the following rules of behavior are observed:

1. Avoid any contact between potentially contaminated PPE and face, mucous membranes or skin;
2. PPE should be disposed of in dedicated containers;
3. remove the gloves by turning them inwards after grasping them by the lower edge, taking care not to come into contact with the outside of the glove;
4. always practice hand hygiene with specific detergents or alcoholic solutions, after removing the gloves;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

13 di/of 49

6.2.4.2.3. Disinfectant in liquid solution or gel

In order to ensure constant and effective personal hygiene, the worker must use disinfectant in liquid solution or gel, in any situation where it is necessary to wash hands, when no soap and water is available.

Its use must always be foreseen after handling the PPE used (disposable mask and gloves).

How to use the disinfectant: pour a small amount of product directly onto your hands and rub until completely dry.

6.2.5. Personnel appointments & Training Certificates

All the appointments (including officers, HSE Coordinator and Foreman) and relative training certificates, required by the applicable Law, shall be submitted to Enel before to enter on site. Enel reserves the right to accept or reject these information requesting additional details.

In the same way, Enel reserves the right to evaluate the composition of the teams of workers employed in each type of activity carried out on site, especially if they are hired locally with project / fixed-term contracts. Ultimately, Enel will reserve the right to request the contractor that the work teams are always made up of expert staff in an adequate percentage.

6.2.6. Personal Protective Equipment

In the hierarchy of initiatives to be put in place to reduce and eliminate risks, the use of personal protective equipment is the last line of protection. This protection is used when the risk cannot be reduced enough to provide a safe working environment for the worker. Contractors must use the full range of PPE offered as fall protection devices, overalls in hazardous materials and complete respiratory protection for tools in confined spaces. In addition to PPE, it is also necessary to provide comprehensive training to ensure that workers are safe in all conditions and in the event of failure of the controls put in place. PPE may be labeled as the last line of defense, but it is just as important if not more important than the other lines of defense in the hierarchy.

Contractor and Contractors shall ensure that their employees wear PPE as required by the specific task being performed, the potential Hazards that person will be exposed to and the specifics of the job.

The Contractor must ensure prohibition of the use of ornaments and other metal accessories (rings, chains, straps with metal plates) by its technicians, in energized areas such as substations, conversion units or others.

The Contractor has the obligation to provide its staff with the appropriate means to be able to carry out the work safely. Therefore, it has the obligation in certain works to provide suitable work clothes considered PPE to protect the employees at work while executing such activities. This also includes the proper training of staff regarding the correct usage and storage of this specific PPE ensuring that employees are made aware of all the requirements while using the specific PPE.

All employees (included supervisors) shall wear a shirt with long sleeves and long pants at all times. Tank tops, sleeveless shirts, and short pants or cutoffs are not permitted.

This condition shall be respected also in summer season and as UV protection measure in order to reduce skin exposition, heat absorption and, in general, heat shock risk. Exceptions can be accepted by Enel only for the long sleeves and only for workers not exposed to direct solar rays and after a specific risk evaluation for these roles carried out by the Contractor.

Loose or floppy clothing is prohibited around rotating or moving equipment. Rings, neck chains or loose jewelry shall be removed.

Contractor must ensure that all the visitors and employees wear the minimal and proper PPE in all the different areas of the site. Work sites, roads, office area, etc.

Provision of PPEs for visitors must be kept on site (minimum 5 pieces per each PPE). PPEs must be in good condition.

Workers, employees and visitors on site shall wear high visibility clothes and appropriate personal protective equipment (PPE).

Below a list of minimum PPE required by, to be adjusted in compliance with the risk assessment.

6.2.6.1. Head Protection

An approved hard hat shall be worn by all visitors and employees working at the site at all times except while in vehicles, living quarters, offices, and control rooms (after construction in control room is complete). Where high wind conditions are present, non-strangling chinstraps shall be worn.



Where excessive heat conditions are present, sun brim shall be worn that must have a front and back protector attached to bottom of brim.

6.2.6.2. Eye Protection

Safety glasses with side shields shall be worn by all visitors and employees always working at the site except while in vehicles, living quarters, offices, and control rooms (after construction in control room is complete). During night operations, only clear or amber colored glasses shall be worn. When safety glasses do not provide adequate protection, safety goggles or face shields shall be the means of protection (i.e.: splash Hazards when working with chemicals, high-pressure washers, chipping, buffing or grinding operations). Welding hoods shall be used during all arc-welding operations. Goggles or other suitable eye protection with appropriate filter lenses shall be used during all gas welding, gas cutting or brazing operations.

6.2.6.3. Foot Protection

Safety shoes must protect worker's feet from various risks: e.g., mechanical (slipping, impact, compression, puncture, cutting etc.), physical (water, heat, cold etc.) and electrical (antistatic properties, conductive properties, etc.). Work shoes must primarily be safe and therefore comply with the main requirements in terms of ergonomics, comfort, effectiveness and safety.

In case of evaluation demonstrates a specific risk on site, e.g. slip hazard, appropriate slip-resistant safety shoes shall be worn by all workers.

In particular on case of working areas with tripping and slipping risk, for example due to mud, obstacles, excavated soils,... workers shall wear high shoes to protect the ankles and proper grip to reduce the fall probability and related damages.

Safety shoes or a non-conductive (electrician's) safety boot shall be worn by all visitors and employees working at the site at all times.

6.2.6.4. Hand Protection

Appropriate gloves shall be worn when the hands are exposed to Hazards such as cuts, punctures or abrasions (cloth, leather, leather palmed); when handling chemicals or Hazardous Materials where absorption is a concern (rubber gloves); and when performing electrical work. Flameproof gauntlet gloves shall be used during all arc welding, gas welding or gas cutting operations except when engaged in light work such as test fitting pieces.

In particular, in order to individuate the correct gloves model related to the specific activities, it's required to respect dedicated codes indications as for example ISO 21420:2020.

6.2.6.5. Hearing Protection

Hearing protection shall be worn in all high noise areas or wherever a high-noise warning sign is posted. Hearing protection like disposable caps or earplugs must be present and available in a box on site.

6.2.6.6. Leg Protection

In case of risk of snakes' bites protection of leg (Snake Gaiters) shall be worn by visitors and employees from the beginning of any pre activity or activity on site.

The contract, through appropriate signs, must demarcate in each area the PPE needed and all free PPEs areas on site. Contractor must also prepare and provide a map with the identification of the free PPEs areas.

6.2.7. Warning Signs

Contractor must assure the placement of enough site signalizations on site. Minimum requirements are:

- Worksite Project information panel at the entrance;
- Use of PPEs;
- Speed limit;
- Speed bump;
- Emergency Assembly point;
- No smoking area;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

15 di/of 49

- Danger signal;
- Signalization of eventual underground or air pipes crossing the site;
- Emergency equipment.

Signals must be understandable to all the workers. A signal handbook translated at least in three different languages shall be provided to all workers.

Contractor shall provide and install on the Work Site an emergency sound alarm system with multiple sources if necessary according to site extension.

6.2.8. Communication system

Contractor (i.e. EPC Contractor or BoP Civil Contractor) according to the H&S Plan shall ensure a fully functional system of communication within the Work Site. No dead zone shall be present on Work Site including road access: in case of working area with no mobile phone coverage a satellite mobile phone, a Wi-Fi network and/or a radio communication system must be implemented. Each Contractor shall ensure the equipment to maintain a direct line of communication between their safety officers, their supervisors, their first aid and fire fighter personnel.

Contractor in Work Sites without cover by phone signal will have to provide and install in the Site Camp a free phone system on the Work Site reserved for workers.

6.2.9. Access to the Work Site

All Contractors must comply with the provisions given for Site Camp security as presented to other Contractors and Subcontractors before authorize the access. This service can be organize by Enel directly or by a Contractor assigned by Enel, and the responsible of the Site Camp security shall implement a system to control the access to the Work Site of all, both of people and vehicles.

Each gate will be equipped with an "access control system", guarded 24/7 by a security guard.

Only authorized people and vehicles are allowed to enter on Work Site. Contractor Responsible for the Site Camp security shall ensure an access control on Work Site, aimed to verify possession of any weapons, illegal drugs and an alcohol tester.

To the extent permitted by applicable Law, Contractor Responsible for the Site Camp security ensures that an alcohol and drug tester will be implemented at the main entrance using the alcohol tester. The alcohol and drug test can be implemented immediately when Work Site opens.

Authorized people are those:

- workers, with all the necessary documentation already checked and available on Work Site, trained in conformity with their duty on Work Site;
- Site Manager, Foreman and HSE key people Enel representatives;
- visitors, cleared by Enel;
- public authorities as required by Law.

All those authorized persons must wear an identity card/badge (with barcode type or similar devices), and their presence recorded on a dedicated daily electronic spreadsheet by the access control system. Attendance record must be submitted weekly to ENEL (mailing list to be communicated) and available to be consult o site an update list with the actual status by emergency reasons.

Authorized vehicles are those checked by the Parties on their good maintenance and order. Authorized vehicles must be identified with proper label, and their entrance recorded on a dedicated daily electronic spreadsheet by the access control system. The drivers of those vehicles which are authorized only for the pit in the main storage area, are not allowed to stand on the Work Site, unless they received a HSE Induction and they wear the appropriate PPEs.

Contractor for Site Camp security shall control access of all other Contractors', Subcontractors' and suppliers' vehicles and their access must be registered on a dedicated log vehicle.

Work Sites in operation are not guarded but controlled by a Surveillance System managed by Enel Security and are protected by an anti-intrusion system so the access gate shall be maintained constantly closed.

In case the Work Site is realized internally to an existing Plant the "Access Control System" shall be based inside and at the entrance of the Power Plant.

If permitted by the applicable Law with the aim to increase safety, Contractor shall implement a video surveillance system that cover the site/work area with more presence of people like canteen, recreation area, main entrance, waste management area, explosive storage (if any).

6.2.9.1. Visitors



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

16 di/of 49

All visitors shall obtain permission to enter the Work Site at the Work Site office and/or Contractor office before entering the Work Site Contractor. A Work Site visitor log shall be maintained. All visitors shall conform to the minimum PPE required at paragraph 4.10, in the HSP, whichever is more restrictive. All visitors shall be notified of the potential Hazards and the Work Site, safety rules and shall be accompanied by or Contractor at all times while on Work Site.

Safety officer shall explain in a HSE Induction: All receive a document, a Safety Flyer with the main information of the Work Site with the indication of the mayor hazards, the free zone and the escape route, the safe meeting points and with all the relevant contact details of the key people; emergency first aid staff, fire staff, safety officer, Work Site Manager, etc. Record of the induction, signed by the visitor must be kept on Work Site.

6.2.9.2. Facilities on Site Camp

Contractor must consider these requirements described below in this paragraph as a further warning in order to complement the requirements required in the E&C technical specification called "*Construction Site Camp*" and annexed to Contract. Therefore Contractor must define a proper offer for "*Construction Site Camp*" technical specification.

Each Contractor has to provide all the facilities on the Work Site as requested by applicable Law and ENEL's prescriptions.

Contractor (i.e. EPC Contractor or BoP Civil Contractor) can be required to provide at or within reasonable access to the Work Site:

- Sanitary facility for both sex;
- Changing facility for both sex;
- Sheltered eating areas, sized with the number of workers on site;
- Sheltered areas for trainings and meetings;
- Communal kitchen;

In case of an Isolated Work Site it might be requested to include:

- Dormitory for both sex;
- Recreation area with Satellite TV hall, Gym, food and beverage automatic distributors, games room, etc. ;
- Area dedicated to religious practice;
- Laundry with washing machine, dryer;
- Shower facility for both sex.

Those trailers/rooms must be in place at the very beginning of the activity, equipped with internet connection, lights, air conditioning and with a proper housekeeping, from the start of the project. Contractor and all other Contractors must ensure lights, air conditioning from the beginning using the temporary generators if necessary. In areas considered with very hot or cold climate, the boxes must be equipped with special kit (very cold / very hot).

Each Contractor might be requested to provide portable toilets and gazebo for area relax with drinking fresh water on site (bottled or dispenser), to be distributed on the different area of the site, in proper container, sheltered from the start of the project and the end of it (Considering all the pre-activities performed).

All Contractors shall keep proper housekeeping of their respective work area and one Contractor will appointed by to keep clean all the common areas like company canteen, common toilets, etc.

In case of particular event like visit of authorities or adverse meteorically events, ENEL reserves the right to ask Contractor for an extraordinary cleaning service before or after the extraordinary events.

In particular, ENEL may request extra cleaning services at:

- contractor's offices;
- customer's offices;
- meeting rooms;
- kitchen spaces;
- cafeterias rooms;
- changing and relax rooms;
- toilet facilities;
- dormitory rooms.

Contractor must provide and install a lighting system with a twilight sensor in all the crossing inside the site, in the parking areas and outside the facilities and along the entire pedestrian walkways on the site



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

17 di/of 49

camp.

Contractor responsible for the construction of the site camp and other facilities has to consider and update (or provide if not existent) a Lightning Study and consequently shall install according to the study results a lightning Protection System on site in order to ensure full worksite protection.

Contractor in his enclosed buildings of the Work Site, must provide and install a smoke detection system.

Contractor in his enclosed buildings of site, must provide and install an ultrasonic rodents-repeller.

The catering Contractor must have a procedure according to the HACCP (Hazard Analysis & Critical Control Point) protocol in order to guarantee an adequate hygienic degree with regard to all processes involving food: manufacture, processing, packaging, storage, transport, distribution, preparation, handling, sale and deliver.

The catering service supplier shall provide for every meal served to users, a satisfaction survey.

In order to saving energy in tropical country, Contractor shall install in the main canteen access an energy saving air barrier.

In operational plants, Contractor and Enel will agree the facilities needed and the use of facilities already in place before start the activities in order to rationalize cost and resources. This point is not applicable for garbage and industrial waste collection.

6.2.10. Traffic Management

Contractor shall set a procedure that has to describe the rules and preventive measures for traffic movement, including approaching and parking near mobile equipment. It shall include key responsibilities and the processes to operate on site and speed limits for employees, visitors and general public. The traffic management plan shall be done in accordance to the applicable Law, Authorizations and to the requirements below:

- Enough and visible signs shall be utilized on site where travel ways are changed due to various circumstances (road restriction, obstacles on site);
- Speed limit: 30/20/10 km/hour (or the equivalents miles/hour) in the internal roads (depending on the condition of the roads), 20 km/hour around logistic area, in all car parks and yards. Speed limit signs shall be placed on site and near pedestrian area (i.e. canteen, offices) a speed bump shall be placed. Speed limit can be modify only after evaluation with ENEL;
- Irrespective of signage, speed should be restricted to suit weather, visibility and road conditions prevailing at the time. Following distances shall be increased and speeds shall be decreased to a maximum of 20 km per hour in inclement weather such as mist (fog), rain, hail, thunderstorms or any similar difficult conditions just as dust or high wind speeds;
- Communication - Communication between vehicles and machinery which need to interact is of most importance. Drivers must follow communication procedures and shall where applicable be trained in the correct use of two-way radios. Hand signals (Waving arms) to be used to draw attention of operator. The use of mobile phones while driving a vehicle are prohibited;
- The temporary park on site shall be well recognized using reflective cones, intermittent lights or other signals (visible also during the night);
- The parking on site shall be well define with a clear separation of the heavy machinery, trucks, personal vehicles, etc.;
- The parking and the vehicle circulation roads shall be well define and separated of the pedestrian areas such offices, paths, pedestrian crossing areas, etc.;
- In case of cable crossing the internal road shall be placed a cable protection ramp.

Contractor shall take all the reasonable measures to manage and reduce the interferences with the local traffic. The presence of the activities site must be highlighted with proper number of signals. Flagmen can be required in order to manage the traffic of site and local vehicles, in case the traffic shall be temporary interrupted the use of mobile traffic lights is recommended.

7. ENVIRONMENTAL PLAN

Accordingly to what prescribed at HSE Terms Chapter 7 Environmental Plan Contractor shall submit to Enel an environmental plan. Environmental Plan should be in compliance with list of environmental conditionings (provided by the local environmental authorities or the applicable Law) during activities and reviewed based on the environmental features for the Work Site provided by Enel.

Contractor shall:

- identified and understood the applicable environmental legislation;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

18 di/of 49

- Provide on request any documentation certifying compliance with in force legislation, including permits and compliance with the limits listed down by them;
 - have procedures that permit continuous compliance with these requirements;
 - Have carried out a risk assessment in order to identify all the processes and activities that may involve potential risks, and ensure they have taken adequate measures to prevent these risks.
- ❖ These requirements must be considered as minimum requirements. If local Law is more restrictive, it prevails on what indicated in this document.
 - ❖ In case of Environmental events the contractor should inform immediately Enel.

7.1. ENVIRONMENTAL RISK ASSESSMENT

Contractor performing any work shall, before starting and during any activity, perform environmental risk assessments which have to be performed by competent personnel (risk assessor) appointed in writing by Contractor. Environmental risk assessor and HS risk assessor might be the same person.

Contractor is responsible for assessing the risks related to subcontractors' activities.

The risk assessments shall be the nodal point of the contractor's Environmental Plan and shall include:

- The analysis and evaluation of the risks and hazards identified;
- A documented monitoring and control plan for the identified risks.

On place, foreman must use the risk assessment by comparing the hazards identified daily before the work on site begins and the mitigation plans developed to control these Hazards.

All workers shall be familiar with the risk assessment, use the existing controls and preventive measures while performing the tasks, and provide input to their Foreman to ensure that risk assessment reflects all Hazards identified and is reviewed when needed (i.e. Gantt/Design Project modification, change of work execution mode, etc...).

Risk assessment must be reviewed formally whenever an Environmental event happens. The document shall be submitted to Enel, for review and approval.

Below a list (not exhaustive) of the aspects that must be consider for the environmental risk plan according to the activity carried out.

Vulnerability of the site

Vulnerability to climate change effects (extreme)

Floods
Heat/Cold-waves
Hailstorm
Heavy snowfall
Storms
Hurricanes
Wildfires

Vulnerability to climate change effects (chronic)

Water bodies / Sea -level rise
Temperature change
Average change in precipitations

Development - Construction - Operation

Interaction with atmosphere

Emissions from combustion
Emissions from machinery or activities execution (e.i. dust)
Emissions from geothermal fluids
Other emissions (i.e. SF6)



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

19 di/of 49

Interaction with soil

Soil structural vulnerability
 Soil erosion vulnerability
 Rainwater / Stormwater management
 Fuel or chemicals or hazardous substances storage
 Interaction with existing infrastructures (houses, roads, etc.)
 Sedimentation impacts

Interaction with Water

Interaction with rivers / lakes / sea
 Risk of floods inside the project / plant
 Risk of floods outside the project / plant
 Wastewater management

Physical impacts

Risk of fire
 Heat
 Noise
 Vibrations
 Electromagnetic fields
 Odors
 Light

Consumption depletion of scarce resources

Water use intensity (i.e. water stressed areas)
 Soil use
 Materials
 Energy

Wastes

Waste management
 Waste recovery
 Hazardousness
 End of Life impact

Chemicals / hazardous materials**Biodiversity and visual impacts**

Land
 Wetland losses
 Natural Habitat degradation/Forest clearing
 Flora (sensitive species and sites e.g. threatened and range-restricted species, near protected areas, and species or sites of stakeholder concern)
 Fauna (sensitive species and sites e.g. threatened and range-restricted species, near protected areas, and species or sites of stakeholder concern)
 Presence of historical/archeological importance/heritage

Governance

Internal monitoring and reporting adequacy
 Workforce and competence adequacy

Compliance

Law, mandatory prescriptions



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

20 di/of 49

Purchasing and supply robustness
Reputation

Some aspects mentioned here will be described in the subsequent sub-paragraphs

7.1.1. Storm Water Management Plan (SWMP) and the Erosion Management Plan

Storm water must be managed to negate water contamination by oils, fuels, litter and other waste and to prevent erosion of site during construction phase or services in O&M phase if applicable. Contractor (EPC Contractor or Civil BoP Contractor), considering the detail design, will submit to Enel the Storm Water Management Plan (SWMP) and the Erosion Management Plan at least 2 weeks before the start of construction (considering any kind of pre-activities, clearing, site establishment, etc.), for review and acceptance by Enel and, once accepted, shall not be amended without prior consultation and approval by Enel. The SWMP must include the detailed design of appropriate works and measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.

The Erosion Management Plan must monitor and rehabilitate erosion events to prevent and reduce the risk of any potential erosion.

If local Law is more restrictive, it prevails on what indicated in this document.

Contractor's and Subcontractor's workers shall be trained on the Environmental Operational Plan prescriptions.

8. HSE ORGANIZATION AND RESPONSABILITY

8.1. CONTRACTOR AND SUBCONTRACTORS HSE ORGANIZATION

Contractor and the Subcontractors shall, upon having considered the size and complexity of the project, the number of workers and the level of risk, ensure the presence on Site of a HSE Team able to manage all the HSE aspects.

Contractor shall provide dedicated and adequate vehicles on Site for the HSE team and depending on area morphology the vehicles shall fitted with 4x4 wheels all of them following minimum requirement indicating in 8.1.5.

The vehicles number should be related to the Work Site, activities and numbers of the members of Safety/Environmental Team. Details and specifications of responsibility for all appointments shall be defined in the Health and Safety Plan, and described in a suitable organizational chart.

The HSE Team must be sized following's ENEL indication or following the applicable Law, whichever is more restrictive. Enel reserves the right to evaluate the competency and performance of the HSE Team, and require a replacement of the not adequate person.

Contractor shall ensure and demonstrate to Enel that Contractor and all his Subcontractors selected for the project, have adequately estimated and quoted the cost of health, safety and environment measures and resources (personnel) that will be required during the execution of works.

8.1.1. HSE Organization for Construction Work Sites

With reference to HSE key people, Contractor shall appoint:

- a. HSE coordinator - one (1) full-time present on site, responsible for the safety and environmental protection of the site;
 - b. HS Officers. Full time present HS officers shall be in compliance with the spreadsheet at paragraph 8.1.4;
 - c. Environmental Officer. (Full time present for complex activities) Env. Officers shall be in compliance with the spreadsheet at paragraph 8.1.4.
- (a) **HSE Coordinator** shall have the following education and professional background:
- Health and Safety Engineering degree or equivalent diploma;
 - It is required at least 3 years of experience as HSE specialist or similar role in



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

21 di/of 49

Engineering or Construction Companies. Safety training Certification according to the local applicable Law;

- Environment training Certification according to the local applicable law;
- Experience in the construction of renewable power plant or conventional power plants or HV substations or HV T-lines.

- (b) **HS Officer** shall be full time present at the Work Site only dedicated to the control of all the H&S related aspects required by applicable Law and according to the H&S Plan. Additional duties of the H&S Officer are: prepare, update and monitor the required H&S documentation.

H&S Officer shall have the following education and professional background:

- Health and Safety Engineering degree or equivalent diploma/qualifications;
- It is required at least 1 year of experience as HS safety specialist or similar role in Engineering or Construction Companies.
- Safety training Certification according to the local applicable Law;
- Experience in the construction of renewable power plant or conventional power plants or HV substations or HV T-lines.

- (c) **Environmental Officer** shall be full time present at the Work Site only dedicated to the control of all the environmental related aspects required by applicable Law and according to the Environmental Plan, additional duties of the environmental officer are prepare, update and monitor the required environmental documentation.

In particular, the Environmental Officer shall have the following education and professional background:

- Environmental Engineering degree or equivalent diploma/qualifications;
- It is required of at least 1 years of experience as Environment specialist or similar role in Engineering or Construction companies for activity with level of risk low or medium (i.e. WTGs erection when performed by WTGs Manufacturer, buildings construction, EPC Solar, simple supply);
- It is required at least 2 years of experience as Environment specialist or similar role in Engineering or Construction Companies for activity with level of risk high (i.e. EPC and BoP for electrical and mechanical activities, Civil Works like roads and foundation for windfarm, tunnel Hydro, Dams, Thermal plants);
- Environment training Certification according to the local applicable law;
- Experience in the construction of renewable power plant or conventional power plants or HV substations or HV T-lines.

However, other figures are fundamental, such as:

- (d) **Firefighter staff and First aid Staff** trained personnel must be appointed, in relation to the number of workers present on Work Site, and as required by applicable Law (further information at chapter 9) or requested by Enel;
- (e) **Documents HSE administrator**, who will manage documentation like machinery maintenance documents, workers training certificate, medical surveillance internal report, restricted duty, etc., using a dedicated software to ensure clarity on document management and repository.

The HS Officer, Environmental Officer and Documents HSE Administrator reports to HSE Coordinator whom reports to the Site Manager. HS Officer shall also liaise with the Foremen.

- (f) **Foreman**: the identification of on-site foreman is carried out according to local law and specific operational requirements in agreement with HSE Terms par. 8.1 and should be constantly monitored. It shall have the following education and professional background:
- Basic training in accordance with local law and field operations;
 - Basic on-site experience in relation to risks and in accordance with local law;
 - Basic knowledge in relation to the work area, the operations performed, hazards identification, risks assessment and all legal requirements for their scope;
 - Experience in supervising workers and work activities to ensure safe working and environment protection;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

22 di/of 49

- Safety training Certification according to the local applicable Law;
- Experience in the construction of renewable power plant or conventional power plants or HV substations or HV T-lines.

Otherwise, for construction sites with a reduced number of workers, the roles of HSE Coordinator, HS Officer and Environmental Officer could be cumulated in one person (all to be specified in his/her appointment).

All HSE Team members must wear a helmet and a high visibility jacket, of the same colors and with the write "HSE Team", in order to be easily identifiable from the rest of workers.

8.1.2. HSE Organization for Operation and Maintenance Work Sites

In case of major maintenance activities, with level of risks medium or high according with the ENV and H&S Plan (like change of blades, gearboxes, penstock painting etc.), the same structure described in paragraph above is applicable (however professional background of Contractor preferably should refer to experience in HSE management in Operation & Maintenance activities). Otherwise, for activities of low level of risk, the Foreman can cumulate the roles of HSE Coordinator, HS Officer and Environmental Officer (all to be specified in his/her appointment). In case of ordinary maintenance (routinely maintenance), it is required at least 3 years of experience as HSE specialist in charge to support the activity execution even if not full time present on Work Site. In case of operation & maintenance activities, that encompass Complex Work, Contractor should have at least, 5 years' experience in Safety Management, preferably in Operation & Maintenance activities.

8.1.3. Complex Activities

In addition to what is specified above and in case of complex activities, Enel requires to the Contractor the appointment of:

- Additional HS Officers onsite thereafter, unless otherwise provided by the applicable Law with at least, 3 years' experience on the activities to be carried out, with the duty to collaborate and assist the HSE Coordinator. Full time present HS officers shall be in compliance with the spreadsheet at paragraph 8.1.4;
- Additional Environmental Officers in case of complex management environmental issues like: particular environmental conditioning, environmental prescription, waste management in industrial areas, dismantling, environmental remediation, etc. Full time present Env. Officers shall be in compliance with the spreadsheet at paragraph 8.1.4

8.1.4. HSE Contractors Team

HSE Contractor Team							
HSE Figures							
Workers ⁽¹⁾	1 to 10	11 to 50	51 to 80	81 to 159	160 to 240	241 to 500	>501 ⁽²⁾
HSE Coordinator ⁽³⁾	1						
HS Officer	0	1		3		5	*
Env Officer	0	1		2		3	*
<i>Complex Activities</i>							
HS Officer (additional)	0	0	+1		+2		*
Env Officer (additional)	0	0	+1		+2		*

⁽¹⁾ Increase the number one (1) professional for each additional 100 workers for cells with *

⁽²⁾ Number of workers considered in above table is including not only direct personnel of Contractor present on site, but also all workers belonging to subcontractors.



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

23 di/of 49

⁽³⁾In case of less than or equal to 10 workers HSE Coordinator activities could be performed by Site Manager + Foreman and in case of less than or equal to 4 worker only by the Foreman

Example 1: in case of normal activities within 300 workers, the HSE Team will be composed by 1 HSE Coordinator, 5 HSE Officers and 3 Env. Officers.

Example 2: In case of complex activities within 300workers, the HSE Team will be composed by 1 HSE Coordinator, 7 HSE Officers and 5 Env. Officers.

(*) In case of Lump Sum contract, Enel and Contractor will agree on how to share material information above. Only after Enel approval and taking in account risks expected on site, for small team, the HSE Coordinator will can perform also other roles of site Contractor team.

8.1.5. Contractors vehicle Safety Requirements

During the activities on Site, Contractors shall not make changes of any kind to: the vehicles, all equipment and tools used in Work Site.

Contractor shall ensure and provide vehicles, in proper number, for all his personnel adequate to the Work Site conditions and activities, with the following requirements:

- Fog lights (depending to the location);
- Bluetooth hands-free;
- ABS (Antilock Braking System) and ESP (Electronic Stability Program);
- Air conditioner;
- Airbags for driver and passenger;
- GPS;
- Spare wheel of the vehicle or equivalent emergency kit;
- Safety belt (3 anchor point) on all seats, both front and rear.
- 4X4 drive and roll cage when external roads are not asphalted/gravel-paved and, in general, with drive risk

Mandatory Equipment applicable:

- Reflective vest;
- Portable flashlight;
- Reflective Safety Triangle Kit;
- Emergency hammer and safety belt cutter;
- First aid kit (with maintenance updated);
- Jack and key for wheel change;
- Fire extinguisher (with maintenance updated);
- Spill kit.

Equipment to be ordered according to applicable Law and needs: All terrain chains or winter tires.

Vehicles must be equipped with a "black box", electronic device including a built-in GPS detector for monitoring and recording data, into anonymous until obvious transgressions of traffic regulations of traffic rules established on site.

Corrective action to prevent Accident shall be implemented by Contractor and a dedicated Report shall be available to ENEL on monthly basis.

Contractors might be requested to provide a transfer service by shuttle bus (only the use of cars, buses and minivans is permitted) between the Work Site and the homes in which the workers live, or to the area in which they are accommodated, particularly for those who are not able to reach the Work Site with their vehicles. Also they have to ensure the transportation between the working areas and the eating area.

Enel reserve the right to extend to all vehicles this request.

Enel reserves the right to request additional data information about the vehicle in case of driving breaches.

8.1.6. Drugs / Alcohol / Weapons

ENEL forbids the use, possession, manufacture, distribution, promotion, transportation or sale of alcoholic beverages, illegal drugs, inhalants, drug paraphernalia, controlled substances, firearms or weapons on the Work Site, whether owned or leased. The drunk or drugged workers must not enter to Work Site. In these cases Enel can require the immediate dismissal of the workers from the Work Site to Contractor.



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

24 di/of 49

Contractor and Subcontractors employees must not show up for work under the influence of drug, alcoholic beverage, intoxicant or other substance including the use of medications which will in any way affect work ability, alertness, coordination, or response or risk the safety of others. Contractor and Subcontractors must guarantee that his workers don't use drugs and alcohol on the Work Site.

ENEL in its sole discretion can use external consultants for random on-Work Site control to check presence of workers suspected under the influence of drug and alcohol. Enel reserve the right to increase the number of control up to all people entering in Work Site and conducting daily test in case of encountering positive evidence. Upon request of Enel it can be requested control check at Access Control Gate till 100% of the site population in case repetitive abuses are recorded within site perimeter or per country historical evidences.

9. PROVISIONS CONCERNING FIRST AID, FIRE PREVENTION AND EMERGENCY MANAGEMENT

9.1. FIRST AID AND INJURED MANAGEMENT

First Aid, Emergency plan and equipment on site shall be in compliance with the applicable Law.

Contractor in charge of the Medical first aid (if any) hereinafter called CMS shall provide a dedicated survey to localize the nearest and specialized "hospitals" available considering the most possible critical situations like: heart attack, internal hemorrhage, fracture, etc.

According with the HSE Plan, and when the public hospital is located more than 100 km away and over 90 minutes of road travel from the site an Agreement with a helicopter service it might be necessary.

Emergency trial must be performed before the start of the activity, including the path between the site and the closer hospital.

The closer hospital must be informed, prior to start the works, of the presence of the construction or main activities.

Due to the size of the site, the number of workers expected on site and the distance from the main built up area ENEL could require:

- Emergency/First aid room with paramedics always present on site from the start to the end of the activities (when activities are ongoing);
- At least two paramedic and a nurse 24/7 available on site (generally adopted when the worksite is in a remote area, with a camp for the workers);
- First aid personnel and first aid kits, at every work area for each Contractor and working area. This personnel shall be identified and communicated to the CMS;
- An automated external defibrillator (AED) present on site;
- Each Contractor's vehicle on the Work Site shall contain as a minimum a first aid kit;
- 4 x 4 emergency vehicle/ambulance with the proper equipment and medical tools to assist and stabilize any injured person on site, with radio communication system to guarantee the communication within the area among Foreman and HSE key people and the first aid personnel and the ambulance or emergency services.

Before decide to transport an injured person to the closer hospital should be done by the paramedic a previous assess of the injured person condition, the distance, the number of workers injured, the time from a hospital ambulance arrival. Depending on that assessment the First Aid team it might be requested to use the ambulance if present or to call for an external ambulance or to request the helicopter emergency service.

Contractors must ensure that all the first aid equipment, vehicles and personnel are on site from the start of the activities on site, considering any kind of pre-activity with workers on site and according with the total amount of the workers on site, and must ensure that the emergency services assist ENEL personnel on the Work Site and the transport to the hospital if necessary.

Contractor and Subcontractor shall ensure a prompt First Aid intervention (not the Medical First Aid) to his employees.

9.2. FIREFIGHTING

Contractor and Subcontractors shall have a fire risk study in the emergency plan and implement all the reasonable measures, as established by law and regulations, as well as guarantee the supply of firefighting equipment. Moreover ENEL could require:

- Preliminary survey of the local fire station available (distance, equipment) - Inform the fire



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

25 di/of 49

station of the activity on going

- Firefighting vehicles full time present on site (the number must be sized in relation to the season and the activities on going and in relation to site if is necessary 4x4 vehicles).
- fire extinguishers and means of emergency notification at every work area. Emergency trial must be performed before the start of the activity.
- firefighter Staff, trained firefighting personnel must be appointed, in relation to the number of workers present on site, and as required by applicable Law.

On site the measures aimed to avoid the risks shall be in compliance with the authorization requirements.

9.3. EMERGENCY PLAN

A system of procedures must be established to organize and supervise the activities on site to ensure to ensure the Environmental protection, the safety of persons and property and the safe and orderly movement of people in case evacuation from a danger zone. In this regard, the Emergency Plan must consider the site as an “open system” that can generate an event inside that can have an impact outside, also, and vice versa.

An Emergency Plan is a preventive organizational tool developed to mitigate the damage of events, expected or not, that could endanger an organization's ability to function as well as to prevent damages to people, material and environment. Such a plan must include measures that provide for the safety of personnel and, if possible, property and facilities. It should also include provisions to assess the severity of an incident and implement steps to eliminate the problem, for example, contacting firefighters in case of a fire. Elements of emergency management planning include determining potential emergency situations and appropriate responses to each. Conducting a business impact analysis can help an organization understand the risks posed by a various events. Finally, all must be identified and secured.

The Emergency Plan shall contain, or is a collection of, all the information required by the applicable Law, Regulations and, in addition, without prejudice of the list included in Article 9 of the HSE Terms.

The emergency plan must be reviewed periodically with the advance of the works especially if the works condition changed. One drill test to check the knowledge and correct application of the emergency plan must be considered as minimum in every site/plant per year. A dedicated meeting to analyze the results must be done and the action plan to solved the criticalities or non-conformities must be sent to Enel within one week and solve promptly in the timing agreed between parties.

10. HSE AWARENESS AND COORDINATION

10.1. HSE KICK-OFF MEETING

Before commencement of Contract activities Enel and the Contractor will held a HSE kick off meeting for coordination of activities and a record of the meeting (minutes of meeting) shall be signed by representatives of both Parties.

10.2. HSE INDUCTION

Pursuant the HSE Terms, Contractor and Subcontractors shall perform a Work Site HSE induction prior to authorize access on Work Site of each worker. All people, after the induction, must have a specific recognition badge. Some specifics to be e addressed during the HSE induction shall include:

- Enel Stop Work Policy;
- HSE Contractor's Obligations;
- H&S Plan;
- Risk assessment;
- Environmental Plan;
- An overview of the identified HSE Hazards on the Work Site;
- The Work Site emergency procedures;
- Restrictions (i.e.: smoking ban);
- Housekeeping;
- Work Site Specific Rules/Behaviors;
- PPE to use on Work Site;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

26 di/of 49

- Reporting procedures;
- Waste Handling and disposal;
- Snake procedure if applicable;
- Interferences.

The Work Site HSE induction shall advise of the requirements and expectations set forth in this document and the H&S Plan or environmental plan.

Re-training will be required when workers demonstrate non-compliance, prove non-understanding or prove to be incompetent in their adherence of the H&S Plan or environmental plan. Enel reserve the right to attend the Orientation.

10.3. PERMIT TO WORK

From a general point of view the Permit To Work (PTW) is a formal recorded process adopted to ensure the proper planning, organization, sharing, tracking and initiation of work that is identified as potentially hazardous.

The PTW is also a means of communication between site/installation management, supervisors, plant operators, and the work performer.

With reference to the scope of application of PTW (Policy No.1225), the contractors undertake to use the relative ENEL tool for the management of the process, guaranteeing, if the company directly covers the functions of Authorizer, Supervisor and Executor of the PTW, to have an organization such that the person having the qualification and role of Authorizer does not coincide with the person covering the role of Executor.

Since the PTW process is managed by digital tools, the contractor's staff involved in the process will have to equip themselves with devices that can support the ENEL digital tools. The contractor will have to request from ENEL the necessary authorizations/enabling to use the digital tools.

The essential features of PTW are:

- clear identification of the type of work (hot work, work in confined spaces, work at height, electrical work, Work in proximity of energy sources such as pneumatic, chemical, electrical, etc.)
- clear identification of the roles involved in work authorization (and limits to their authority) and who is responsible for specifying necessary precautions
- Identification of the risks of the area
- Identification of the risks related to the activity to be performed and prevention measures to be adopted
- Interference risks (simultaneous activities on site) and prevention and control measures to be adopted
- Allowable duration of the activity
- Safe behaviors to be adopted during activities

The process and information related to PTW is formalized through the use of forms (paper-based or electronic)

Supervisor, Authorizer and Executor has to keep their own copy of the PTW. Any changes must always be tracked on all copies.

The PTW must not only refer to the need to isolate energy sources, but must also provide indications regarding the preliminary operations and the risks present in the area of the activity to be carried out.

PTW must be used whenever the activity to be performed may adversely affect the health and safety of personnel.. Under the conditions mentioned above, the use of a PTW must be considered, at least, in the case of:

- maintenance, repair, inspection of machinery or confined spaces, tests, fuel management, waste management, etc.;
- non-routine, not planned or schedule changed activities;
- special works (electrical works, work in potentially explosive atmospheres, confined spaces, hot work, special work at heights, etc)
- work in which two or more individuals or groups must coordinate activities to safely complete the work in order to avoid interference situations;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

27 di/of 49

- work in which activities and responsibilities are transferred from one group to another.

Furthermore specific works, due to their nature and hazardousness, may be subject to mandatory standards/procedures (ex: Confined spaces, Fall from height, etc...), requiring adequate preparation, equipment, planning, forms to be completed (e.g., electrical works, work in potentially explosive atmospheres, confined spaces, hot work, special work at heights, etc.). The information included in these procedures must mandatorily supplement the information required within the PTW.

In order to achieve the above objectives, the process of defining and releasing the PTW must be carried out using standard forms through which systematically manage the activities foreseen from all points of view (procedural, responsibilities, safety, roles, etc.).

For this purpose, the process has been subdivided into several steps.

The phases identified are as follows:

1. Identification and description of work to be performed
2. Identification of duration and expected start of the work
3. Identification of people involved and assignment of relevant roles
4. Identification of risks and consequent health and safety measures
5. Execution of works in special conditions (electrical work, hot work, confined places, work at height, underwater work, etc.).
6. Securing the area/plant/machinery/equipment (manouvres to isolate hazardous energy sources)
7. Application LOTO procedures (number of locks and tags related to the manouvres identified)
8. Approval of the PTW
9. Role or site changes, tests and work suspension
10. .Extension of PTW terms PTW closure

The process to approve a PTW will be the following:

The PTW must be signed by the Supervisor, Authorizer, Operators, and the Executor specifying Date and hour of signing.

According the organizational conditions the Authorizer and Supervisor roles can be covered by the same person while the Executor has to be a different one.

The work can start only after the approval of all the above figures. If between the PTW definition and Approval some roles have changed (ex: Authorizer working in shift) the figures approving the PTW are accepting all the contents defined in the previous phases.

The delivery of the work area (handover) must be done through a detailed verification of the implemented safety measures, done jointly by the Supervisor and the Executor.

Before concluding the handover, the Supervisor should inform the Executor of the hazards still present in the work area, indicating what nearby equipment is in operation and the nature of the hazards, such as pressurized fluid, high temperatures, electrical fire hazards. If deemed necessary, the Executor may propose to the Supervisor, and through them to the Authorizer, additional controls or safety activities to make the areas safer.

If the Executor is a Contractor, the Supervisor shall formally hand over the work areas to the Contractor's foreman, informing him of the risks still present on the work area, indicating what nearby equipment is in operation and the nature of the risks, such as pressurized fluid, high temperatures, electrical fire hazards. With the handover, responsibility for the work areas and equipment provided under the PTW is transferred from Site/Operations and Site/Maintenance to the Executor.

10.4. PRE-JOB CHECK AND POST-JOB REVIEW

Immediately before the beginning of each specific activity at the Work Site, Contractor shall and shall cause its Subcontractors, by means of their Foremen or other appointed person (with equivalent competences and responsibilities), to carry out a HSE meeting of pre-job check.

The pre-job check shall be repeated whenever a change occurs in the working conditions or new Personnel are assigned to the activities. In this meeting the Foreman, or other responsible person, and the staff shall review all stages of the activity and the related tasks, assess situations with the potential risk to HSE that may occur, and describe the Equipment and material that they have to use and the behaviors to be adopted in order to prevent Incidents. The pre-job check shall be properly documented and archived. The pre-job-check shall ensure, also with the support of a specific checklist, that all Workers:

- be informed about the activity to be done and operational procedures;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

28 di/of 49

- understand the risks associated with the specific activity to be done;
- consequently adopt all necessary measures to ensure the activity is carried out safely and protecting the environment.

At the end of the activity, typically at the end of the day, the foreman shall also organize a Post-Job review to collect a lesson learnt from the job, taking notes on recorded unforeseen situations and the safety measures that have been applied for risk mitigation.

Since the Pre-job check and Post-Job Review process is managed by digital tools, the contractor's staff involved in the process will have to equip themselves with devices that can support ENEL digital tools. The contractor will have to request to ENEL the necessary authorizations/enabling to use the digital tools.

10.5. TRAINING

10.5.1. Basic Training

Contractor shall ensure that all the workers are trained as required by the Law, regulations, according to the risk assessment and that they have valid competent certificate of training.

As example, below are listed the competence developed with a basic training course:

- Risk Assessment Concept;
- Stop Work;
- Likelihood-Damage;
- Prevention and protection (PPE, CPE);
- Safety and Environment Organization on Work Site;
- Rights, obligations, Breaches and Disciplinary action;
- Monitoring on Work Site by Law Inspector or ENEL.

10.5.2. Other required training

All workers shall be trained for the work assigned, skilled as required by Local Laws, Regulations and risk assessment. Depending on employee's exposure to certain Hazards other required trainings may include:

- Work at Height;
- Global Wind Organization (GWO) training;
- Respiratory Protection;
- Fall Protection;
- Permit Required Confined Space Entry;
- Excavation Safety;
- Mechanical Lifting (including rigging, slings, etc.);
- Manual Lifting;
- Arc Flash / Electrical Safety;
- Blasting Operations;
- License in the operations of Cranes Forklifts, lifting platforms;
- Environmental Training (regarding the Environmental management plan of site, included, but not limited to, waste and chemicals management system of site and Emergency environmental management);
- First Aid;
- Fire Fighting training
- Operating of machineries

Contractor, in case Local Law do not require specific training for the risks defined in the risk assessment, shall in any case develop a system of trainings, to be implemented also by the sub-contractors. Training will ensure the engagement on the project of skilled employees capable of performing all work in a manner to prevent incidents.



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

29 di/of 49

In particular, the foreman, in addition to the mandatory training required by local law, must receive adequate training as indicated in HSE Terms par.8.1 b) and in relation to the specific activities performed on site.

The Contractor must provide records and certifications in this regard and in accordance with paragraph 8.1.1. f), if not already available.

10.5.3. Specific training on construction and operation activities in addition to legal requirements

All operating personnel at the beginning of its activity at worksite must undergo specific training to carry out the activity in a complete safely way and respecting the environment. Previous certifications and curriculum of similar trainings/working experiences executed by workers have to be shared by Contractor; under its responsibility, the Contractor shall evaluate the trainings/experiences of each specific worker and if adequate for the assigned activities, the operating personnel could avoid the training described below.

Contractor, before the start of activities, shall submit to Enel a detailed list with description of training.

The contractor is in charge to carry out the required additional training, that will have an adequate duration (depending from the difficulty of activity under training) to allow the learning of the working methodology in terms of quality, efficiency and safety. The first phase of training will be articulated in theoretical parts, practical parts and consequent evaluation and will have an duration of at least one day; the second part of the training (practical knowledge improvement during first real activities) will have a total duration of additional 4 working days and will be executed with side by side activities with expert workers and/or autonomous activities controlled by foremen/supervisors. All the training will be carried out with visible identification of each worker respect to the step of the training (i.e.: distinctive element on the helmets).

In particular the overall training will be divided into 2 phases:

1 PHASE (not less than 1 day)

I. Theoretical part

- Provide workers with a theoretical tool that aims to show how to carry out activities safely and with respect for the environment, detailing all the risks associated.
- Detailed classroom presentation of the activities that includes materials and machineries involved, including the sharing of accidents and environmental impact for the activities indicated.

II. Practical part:

- Vision of the activities to be carried out in the field, with the aim of showing the worker the technical, safety aspects and preventive environmental actions, related to the construction system used in the project;
- Practical execution of the activity on field, supervised by experts or foremen/supervisors; the area of the training has to be arranged on field, the organization of this area should be delimited and organized as a training area;

III. Evaluation: Written evaluation of each worker to verify the theoretical knowledge acquired and practical evaluation in which the worker must demonstrate that he is able to carry out the work in relation to his qualifications from the point of view of quality, efficiency and safety. Both evaluations have to be realized after the point I and II, described before.

2 PHASE (not less than 4 days)

IV. Side by Side Activities on field: after the completion of previous steps there will be side by side activities with expert workers and autonomous activities controlled by foremen/supervisors to be realized in the site

Workers who pass the training will receive a "trained worker" certificate in a diploma and will also have to wear a sticker on their helmet, which will allow clear identification of the worker by HSE personnel and supervision in the field. Certificates acquired will be then considered by Enel on next projects.

Just as example for Solar technology, the training part must at least deepen the activity of piling with ramming machines, the assembly of structures, trackers and modules as well as the laying of cables; each typology of worker has to be trained obviously respect to relevant activity in which will be involved.

10.5.4. Sample tests on field

Considering the events occurred in the project/site and the evidence of the inspections findings, Enel reserves itself the right to request sample tests on workers and/or foremen to be performed by itself or third party (in charge to Contractor) and Contractor representative to evaluate the knowledges and skills



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

30 di/of 49

of the specific workers and in case of negative result the Contractor will have to ensure additional training sessions; in case of repetitive and most severe Contractor breaches, will be applied the relevant contract clauses (as per HSE Terms), eventually till the contract termination

10.6. WORK SHIFTS & LONELY WORKS

Contractor and Subcontractors, scheduling activities, shall guarantee the compliance with the applicable local Law about normal working hours and Overtime and respecting the human's rights. When not locally regulated the following approach is suggested:

- Full-time weekly working hours should be around 40 hours per week.
- As regards the daily working time, there are no limits, except that of guaranteeing the employee an 11-hour rest within 24 hours. Consequently, the employee cannot work for more than 12 hours a day (+1 trip to their home).
- The employer also has the obligation to guarantee a break for every 6 hours of consecutive work, to allow the employee to eat or rest from his duties.
- During the working week, there must be at least one day of rest every 6 working days.

If for exceptional reasons, there are 7 days of consecutive work, a day of rest is ALWAYS MANDATORY (therefore the resource will not be admitted on site)

Example of correct execution

	Day 1	Day 2	Day 3	Day 4	Day 5			
Worker 1	M	A	N	AN	R	M	Morning	07:00-14:00
Worker 2	A	N	SN	R	M	A	Afternoon	14:00-21:00
Worker 3	N	SN	R	M	A	N	Night	21:00-07:00
Worker 4	SN	R	M	AN	N	AN	After Night	
Worker 5	R	M	A	N	SN	R	Rest	

Working shift shall be arranged considering also the local condition and wheatear condition. Employees performing daily shift cannot perform the following night shift.

It's forbidden work on lonely condition without visual contact between workers when there is a specific medical prescription for the worker in charge of the activity or when the activity present one or more risks like electrical, entrapment, drowning, fall from height, explosion, projection or falling object (h> 2m). In all those case and also when indicated by the foreman each activity shall be performed with the possibility of mutual helped and alert between the workers.

10.7. NIGHT WORK OR POOR NATURAL LIGHTING CONDITION

This kind of works are not allowed without ENEL official acceptance. Contractor and Subcontractors shall submit to Enel a procedure/Method statement for ENEL validation when these works are recognized as necessary then before start the activity Contractor and Subcontractors shall submit the procedure updated and the permit to work at least 2 working days before the start of the activity, to be validated by Enel. The document shall include:

- risk assessment;
- mitigation measures and artificial light;
- list of personnel authorized to stay overnight;
- Method statement/Procedure;
- Availability of emergency structures open during the night.

For further detail, consult "Minimum requirements for night work in Work Sites".

10.8. INITIATIVES FOR SAFETY IMPROVING

10.8.1. Toolbox Talks (Pre job check)



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

31 di/of 49

As indicated in HSE Terms par.10.3, Contractor and each Subcontractor shall hold a documented toolbox talks prior to the work shift (daily) and prior to new job task implementation.

Its Foreman, before executing the work gathers the team members and proceeds to:

- describe in detail the main phases of work to be undertaken and their associated risks, with a level of detail adequate to the level of complexity of the activity to be undertaken;
- draw the attention of the workers to the work stages which are most significant in terms of safety (e.g. where coordination between different activities is necessary, use of special equipment, etc.) and on associated preventive measures to be adopted in order to prevent accidents, expressly requiring observance;
- indicate the equipment to be used, the necessary collective protective equipment and personal protective equipment, requiring the control of efficiency of the workers before allowing their use;
- Entrust tasks, providing all further required explanations.

If some operations should change during the works or there is the perception of a rising danger, it is necessary to arrange a new Pre-Job Check (according to the proper Policy) before continuing the works. At the end of the meeting, the Foreman asks each team member to:

- Confirm their understanding of the specific tasks assigned;
- Focus attention to particular safety measures required in each work stage;
- Define the coordination activities with the other workers and any further specifications;
- Ensure that before the job preventive measures have been implemented or available.

The Foreman compiles a Pre-Job Check Summary Report in which are summarized the main key points arising from the meeting. The safety officer maintains documentation of the meeting. Workers attending the meeting shall sign the attendance sheet and participate by reporting any known workplace Hazards, equipment deficiencies, etc. Enel adopts his own procedure for the Toolbox talk, called Pre-job check and Post-job review that could be submitted to Contractor in case it doesn't have any implemented procedures.

10.8.2. Behavioral Safety Initiatives

ENEL implements initiatives aimed at improving the safety and environmental culture, at increasing the safety and environmental awareness of the workers and eliminate or mitigate the risks on Work Site. ENEL could require to Contractors to join this commitment or projects, implementing in the Work Sites those initiatives. Instructions and data reporting sheets will be submitted to Contractors.

11. VEHICLES, MACHINERY, EQUIPMENT, TOOLS AND MATERIALS

Contractor shall supply and use all vehicles, machinery, equipment, tools and materials compliant with applicable Laws, require for the appropriate safe and high quality execution of scope of Contract.

In areas, where rollover risk has been highlighted, all vehicles and machineries must be equipped with roll-cage.

Use vehicles, machineries, equipment, tools and materials and best practice standards set forth in applicable regulations, in addition to the requirements from HSE Terms, make available (and forward, if required) to Enel, before the commencement of each activity at the Work Site, all information related to the vehicles, machinery, Equipment and materials it is going to use in the performance of the specific activity. Enel reserves the right to validate this information before authorize the activity execution. Additionally Enel may require a relevant declaration signed by the Contractor, abstain from using vehicles, machinery, Equipment, tools and materials owned by Enel without prior written authorization.

Contractor shall ensure that all vehicles, machinery, Equipment and tools shall be regularly maintained in order to withstand deterioration (including protective material covers, insulation, and others). In addition, they must be equipped with all the elements that ensure their safe use (lights, alarms, rear-view mirrors, protective guards, etc.). The use of vehicles, machinery, Equipment and tools without the protective devices is prohibited.

Contractor's vehicles, machineries, equipments and tools shall only be used by authorized Personnel. When required by the Contract or applicable Law, Contractor shall authorize only trained and/or qualified personnel, which shall own certification for the use or driving license/permission.

Enel shall preventively authorize Contractor and Subcontractor vehicles and machinery entering Work Site for the execution of Contract activities. All vehicles and machinery used in the Work Site shall have inside an identification number and the Contractor or Subcontractor company Logo.

ENEL reserves the right to inspect all the elements and relevant documentation described in this



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

32 di/of 49

subsection, before and during the use of machinery, vehicles, Equipment and tools in order to verify their compliance with the applicable Law, standards, and HSE Requirements, as well as the Contract provisions. In the case that during the inspection Enel verifies they are not compliant, the Contractor shall immediately stop and/or remove them from the Work Site.

11.1. CRANES, EARTH-MOVING MACHINERY, FORKLIFTS

Contractor shall ensure that all machineries, tools and equipment are identified, safe to be used and maintained in a safe condition as prescribed by the Maintenance Manual. Contractor shall ensure the availability of a dedicated register containing all machinery, tools and equipment, including Appropriate Certification for use and maintenance manual. The identification numbers listed in the register shall be showed together with Contractor Logo in the lateral/front or in the rear of the machinery facilitating the identification of the owner.

11.1.1.

Cranes

Any Contractor or Subcontractor operating, a crane or rigging on site shall have a program to address the Hazards that includes the items below:

Only trained, qualified and certified personnel shall operate cranes and other truck equipped with such lifting equipment.

Only approved and certified personnel shall be allowed to operate cranes. Contractor shall provide to ENEL written certification for each employee who might operate a crane.

All cranes shall be strictly maintained in accordance with the manufacturer's recommendations. Maintenance log has to be available for ENEL.

The following are requirements to minimize the possibility of an incident during crane and rigging operations:

- ✓ Define the crane access on worksite and locate its placement. It must also be defined range of moving and lifting of loads and their storage.
- ✓ A lift plan is required for all heavy lifts, a heavy lift is at 75% of the cranes capacity. All heavy lifts should be identified prior to construction and be included in Contractors' method statements.
- ✓ All personnel shall be clear of a load before it is picked up and shall remain clear at all times. Personnel should face the crane in full view of the crane operator and/or signalman. Personnel, including those holding tag line(s), shall never be under suspended loads or go between the load and other objects where they may be trapped or crushed.
- ✓ The crane operator shall never leave the control while a load is suspended. Cranes shall not be left connected to towers sections, whether erected or not, without an operator at the crane controls.
- ✓ Non-conducting tag lines shall be used to control all suspended loads. Chains or steel cables are not acceptable. Tag lines shall be attached before a load is lifted.
- ✓ A single designated signalman shall be used if the crane operator does not have full view of operations, especially when moving in restricted area with the presence of other workers. Where practical, the use of radios or other communication equipment is also recommended. The crane operator shall respond only to signals from the signalman, but shall obey a stop signal from anyone at any time.
- ✓ Any vehicle shall have warning lights, appropriate lights if used at night, an alarm signaling when the vehicle is backing up and for heavy vehicles a safety active device to avoid interference man-machine
- ✓ The crane operator shall inspect lift lines, rigging, slings and crane fittings/fasteners daily when in use or prior to each lift and replace if necessary. This equipment shall be properly rated for the intended load and certification tags attached to all slings.
- ✓ A crane shall not be used to pull a load sideways.
- ✓ A crane boom shall not be used as a ladder for walking, except for necessary maintenance of the boom and its components.
- ✓ When not in use, the crane boom shall be kept in the cradle.
- ✓ For rigging, never use a chain when it is possible to use a wire rope.
- ✓ Determine the load weight before rigging it and do not exceed the safe working load of any equipment.
- ✓ Before being unhooked, all loads shall be safely landed and properly blocked.



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

33 di/of 49

- ✓ A wind forces assessment should be conducted prior to starting with the task.

11.1.2. Forklift

- ✓ Only trained and qualified personnel shall operate forklifts.
- ✓ Training shall be conducted for the operator
- ✓ Contractor shall provide written certification to ENEL for each employee who might operate a forklift.
- ✓ All forklifts shall be strictly maintained in accordance with the manufacturer's recommendations. Maintenance log has to be available for ENEL.
- ✓ Personnel shall not ride on forklifts.
- ✓ The forklift shall have warning lights, appropriate lights if used at night, and an alarm signaling when the vehicle is backing up.
- ✓ When a forklift is left unattended, the forks shall be fully lowered, controls put in "off" or "neutral" position, the power shut-off, and the brakes set. Wheels shall be locked if the forklift is parked on an incline. Ignition keys shall be removed and stored in a secure place.
- ✓ The forklift operator shall ensure that the forklift's wheels are properly locked before unloading.
- ✓ Seat belts shall be worn when operating any equipment.
- ✓ All the movements must be carried out with the fork in low position.
- ✓ In case of slopes and irregular ground the operator must be instructed to avoid the overturning of the forklift. All equipment must have a rollover protection system.

11.1.3. Ramming Machine

For the piling work, the contractor must choose the Ramming machines that have state-of-the-art safety systems in order to safeguard the safety and health of the workers. From the construction point of view, the machines must comply with the safety requirements for the risks pertaining to the type of use envisaged on site.

Machines on site shall mandatorily respect these requirements:

- Physical protection (shell or grid) of all movement parts in order to avoid entrapment or splinters ejection
- Guard of track in order to avoid feet crushing or entrapment
- Safety physical block of all movements part during maintenance operation
- Use of chains or steel wire ropes certified, foreseen on machine manual and properly dimensioned for the weight lifted

In general, it is possible to use the ramming machine to bend or to extract piles only if this operation is foreseen on the machine manual and with specific tools.

The preferential choice of the machines by the contractor must fall on those that comply with the following safety criteria:

- Machines equipped with redundant safety devices that prevent the accidental fall of the hammer;
- Machines equipped with sensors for human-machine interference management;
- Machines with periodic preventive maintenance plan provided by the manufacturer;
- Machines equipped with an ergonomic and user-friendly control console, (Alternatively a radio-controlled console is preferred);
- Machines equipped with protection systems in case of accidental breakage of hydraulic hoses;

In addition to the previous requirements, machines that are equipped with the following operating instructions are to be preferred:

- Risk assessment and vertical pole positioning procedure by a second operator
- Emergency procedures to be followed scrupulously by the operators in the event of: Hammer jammed/stalled;
- Breakage or loosening of hammer lifting systems (hydraulic piston, chain, ring nut, or other system supplied);
- Sudden ground sinking below the machine.

11.2. TOOLS AND EQUIPMENT



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

34 di/of 49

All, tools and equipment shall be regularly inspected by Contractor at least monthly or as required by applicable Law and risk assessments.

All Contractor personnel shall be competent when operating or using and tools and equipment. This shall include:

- Appropriate certificate of professional competence;
- precision measuring instruments with calibration certified by an external body;
- Certificate of task training, where required;
- Tools with sharp points or edges in toolboxes must be protected with a cover;
- No make-shift (homemade) tools will be allowed on site;
- All chisels used on site shall be fitted with a hand guard to prevent hand injuries in case of a miss with the hammer;
- When using interlocking type of connection of an airline, whip lash arrestors shall be in place to prevent accidental disconnection;
- Compressed air shall never be used for any purpose other than that for which it is provided;
- In order to prevent injury to personnel and material loss, an emergency stop device that permit workers to stop the machine during an emergency by pushing a button or pulling a rope (where needed).

In case of use handtools stand in the correct position and make sure there are no obstacles in your way when you are using it and do not remove protection. When possible use modern type equipped with the dead man button.

If in site will be use electrical vehicles, Contractor must prepare a dedicated area inside the site camp equipped with devices for charging the batteries.

12. HAZARDOUS SUBSTANCES (MATERIALS MANAGEMENT)

According to the HSE Terms prescription, packaging and labelling of Hazardous Substances shall provide information for safe unloading, storage and handling.

Handling, transportation and storage of Hazardous Material shall comply with applicable Law and with specific site operating instructions.

Contractors shall ensure that storage facility for any Hazardous Material on-site:

- Shall be sheltered and, in case of cylinder they shall be secured in an upright position;
- Has a containment a basin that contains possible spillage volume (volume in compliance with applicable Law)
- Anti-leakages kit shall be available where there is the risks of liquid spill out.
- An emergency instructions sheet must be always available on site with instructions and all data sheets

All the Safety Data Sheets must be available in the storage and accessible in the working area.

The dedicated area shall be equipped with an eye wash station and an emergency shower.

12.1. EXPLOSIVE

In case of activity to be performed with the use of explosive the risk must be evaluated and Contractor shall appoint a dedicated expert person trained to manage and prepare explosives and shall undertake all the safety and environmental preventive measures.

- License for transportation and storage of explosive materials must be obtained, as required by applicable Law
- Area of storage must be segregated, located far from any heavily vegetated areas, combustibles (stored oil, diesel, etc.), and on a non-combustible surface
- Remote Video surveillance system implemented full time
- Specific Risk and Method Statement for the activities

12.2. ASBESTOS



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

35 di/of 49

Without prejudice of the HSE Terms in any case of work involving Asbestos Containing Materials (ACMs), ENEL will provide indication about its management. As per general view during construction is not admitted the use of material containing asbestos. ACMs could be secured or removed prior to the work commencing and Contractor must keep under control all the prevention measures, legal authorizations for removal, transport and final disposal. The exact method may vary depending on many factors but it will be subject to applicable Law. Contractor must notify promptly to ENEL every ACMs found in the Work Site and, if required by Enel, a proper investigation campaign and sample analysis on existing material/building/soil shall be performed by the Contractor before starting with activities on site.

12.3. SANDBLASTING

The potential Hazards during sandblasting operations include, but are not limited to inhalation of dusts (including lead from the paint or silica from the blasting medium); high noise levels; high operating pressure of equipment; etc.

The following are requirements to minimize the possibility of an incident during sandblasting operations must be including in Contractors program:

- Approved respiratory and hearing protection shall be worn.
- Appropriate eye protection shall be worn, in any case a wash eye shower shall be present in the area
- The use of silica sand in the blasting medium is discouraged.
- Paint coatings being removed by sandblasting operations shall be considered as lead containing until proven otherwise.
- Check all hoses every day for leaks and signs of wear.
- Disconnect and lock out all electrical power before sandblasting.
- Blasting nozzles shall be equipped with a cut-off device (dead man's switch).
- Secure and hobble all high-pressure air hose connections.
- All air hose connectors shall be pinned or wired to keep them from coming apart.
- Warning signs shall be posted identifying potential Hazards.

12.4. PAINTING

The potential Hazards during painting operations include but are not limited to inhalation of toxic vapors or spray mist, fire Hazard due to solvents in the paint, environmental impact etc The following are requirements to minimize the possibility of an incident during painting operations and must be included in Contractors program:

- Approved respiratory protection shall be worn;
- Approved eye protection shall be worn, in any case a wash eye shower shall be present in the area;
- Be aware of and eliminate ignition sources in the work area;
- Ventilation (either mechanical or natural) shall be adequate to keep the work atmosphere less than 10% Lower Explosive Limit (LEL) and the oxygen (O2) content greater than 19.5%;
- Bleed or de-pressure all lines before disconnecting;
- Warning signs shall be posted identifying potential Hazards;
- Contractor is responsible for complying with local act concerning the Volatile Organic Compounds (VOCs) limits, training, selection of equipment cleanup and surface preparation solvents, recordkeeping, emergency and disposal. If not specifically regulated by the local authority Contractor shall prefer to purchase paints/solvents with the lowest VOCs content as long as reasonably practicable.

13. PROTECTION OF THE ENVIRONMENT

In addition to the HSE terms prescription/request regarding the environmental protection, here is following other specific topics the Contractor undertakes to provide.

13.1. ENVIRONMENTAL HAZARDS



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

36 di/of 49

Possible Emergencies cause are:

- Spills of pollutants (oil, fuels, waste waters, etc.),
- contamination of polluted water, white and black waste water

An emergency procedure for chemical spills or other potential incidents shall be developed.

All sensitive sites will be identified such as rivers and wetlands and procedures developed to ensure proper handling of oil/fuel or chemical spillages in these areas. It will be ensured that all employees are aware of the procedure to be followed in case of accidental spills and leaks. It will be ensured that the necessary materials and equipment for dealing with spills and leaks is available in the working area at all times. All employees will be trained to handle all accidental leaks and spillages on site appropriately.

To minimize the risks the preventive measures reported in this document about sources of possible contamination should be performed at the worksite areas.

For further detail, consult *"Refueling of vehicles and machinery at worksites"*.

13.2. ANIMALS HAZARDS

Contractor and sub-Contractors shall consider the risk of animals, such as snakes, reptiles, spiders and wild animals in their emergency plan and implement all the reasonable measures to avoid it. ENEL requires a preliminary assessment of the most common animals present on site. In case of presence ENEL may require:

- Procedure to follow in case of snake's bit or animal's attack (reference person to call);
- Training on all the workers regarding the animals' procedure;
- Appointments of valid, trained persons in charge for the snake's bites and safely handle/capture reptiles;
- Training to a group of employee of the staff to be able to catch and relocate dangerous animals, spiders, snakes;
- Use of appropriate PPEs;

In case of presence of wild dangerous animals the Contractor is required to take all the reasonable measure to avoid the risk, such as:

- Training on all the workers regarding the risk and the measures implemented;
- Agreement with a trained animals' wrangler, to assist the Contractor in the management of the wild animals' presence;
- Use of appropriate PPEs;
- Provide a full time surveillance patrol (especially before the erection of the fence).

13.3. WASTE MANAGEMENT PLAN

Without prejudice of HSE Terms, Contractor shall set a plan that has to be followed during classification, handling, storage, transportation and disposal of waste generated as a result of typical construction/decommissioning/maintenance activities, in accordance to the applicable Law and to the requirements below:

- The first objective of the plan shall be to minimize the negative effects of the generation and management of waste on human health and the environment, so shall aim at reducing the use of resources and favor the practical application of the waste hierarchy :prevention, preparing for re-use, recycling, other recovery (e.g. energy recovery, recyclable materials in catering services, etc.) and disposal
- Contractor shall prefer bio-based content materials, recyclable or reusable components and recycled-content materials and in general use resources at their highest potential throughout the lifecycle to improve efficiency (in product manufacture, design, construction, operation, refurbishment, and at end of life).
- Identification of designated place(s) to store different types of waste such as not recycled and Hazardous waste materials. Before placing an order or a contract with a waste carrier, the carrier shall be asked to provide a copy of his Waste Carrier License or proof of registration as a Waste Carrier by the local authority. A copy of this approval must be kept on site in the environmental file.
- The waste management plan has to include also a specific chapter dedicated to demolition waste



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

37 di/of 49

and to excavated material, if any.

- Waste shall be segregated at source and removed by a licensed Waste Removal Contractor.
- Waste shall be removed on a regular basis in order to respect waste storage limits in compliance with applicable Law. If there is no specific requirement by Law, Contractor must guarantee and respect the following limits: no more than 100 m3 of not hazardous waste and no more than 20 m3 of hazardous waste and if not exceeding this quantity no more than 3 months for hazardous and 6 months for not hazardous.
- Waste storage on site out of the designated areas is absolutely prohibited and must be considered a severe noncompliance with HSE Requirements. The temporary storage on the work sites areas must be done in the proper containers and shall be limited to the time of activities execution.
- Broken PV panels must be segregated and collected as Waste of electric and electronic equipment(WEEE) paying particular attention to avoid dispersion in the environment of any fragments;
- Needed interventions to delimitate eventual polluted area ensuring environmental protection and Safety condition
- Chemical analysis of polluted soil and water.

13.4. AIR EMISSION & DUST

The main problems induced on the atmosphere are dust generation and gas and particulate emissions. These impacts are related to excavation/demolition activities and to transit of heavy vehicles. Air Quality Sampling shall be ensured by Contractor in order to check conditions on site.

To prevent dust emission from vehicles ensure that all vehicles entering or leaving the site carrying a load that may generate dust are covered, except during loading and unloading. Install, operate and maintain dust control measures and/or equipment in the areas in which the risk is identified (such as mobile water tankers equipped with a pump and sprays to suppress dust from unsealed roads or storage area or consider windy days in the plan of the activities); lastly vehicles must respect law speed limits, if any, and must move at low speed in work site. Loose soil is to be compacted as soon as possible after excavation, grading or filling;

To prevent gases and particulate emissions use vehicles equipped with catalytic mufflers, particulate filters for diesel engines and keep under control and maintenance all the vehicles used.

In order to reduce the consumption of fossil fuel used by the generators, according to ENEL request, Contractor shall provide and install within the site, a small photovoltaic system for the energy needs.

13.5. WATER MANAGEMENT

Contractor shall ensure that:

- All the withdrawals are used only for the purpose of the authorization;
- There is a regular monitoring of all the permits for water discharges and water withdrawals according to local Act and/or authorization;
- Erosion control measures and treatment device are installed before starting the worksite in order to minimize the threat of flooding and loss of rich nutrient soil and maintain the flow regimes of any water courses and prevent any deterioration in water and soil quality;
- Drainage trough and from areas of disturbance is designed to minimize surface flow velocities;
- Adoption where possible of a recirculation system for waters that allows the reuse of the treated water in the production process;
- Loose soil is to be compacted as soon as possible after excavation, grading or filling;
- Cleaning of equipment and flushing of mixers must occur in designated wash bays (with contaminated water collected, stored / contained) to ensure that contaminated wash water does not enter the environment;
- Water Quality Sampling shall be ensured by Contractor in order to check condition on site. At least, every two months the sample shall be provided by the site camp contractor responsible.

For further detail, consult "Washing of vehicles at worksites".

13.6. NOISE AND VIBRATION



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

38 di/of 49

Particular attention should be given in evaluating noise and vibration impacts.

The activities that generate the greatest contribution in acoustic terms are in general: demolition, excavations and earthworks, concrete and cement production. Contractor and Subcontractors must ensure that the limit listed in the applicable Law are adhered to and measures to limit noise from the work site are implemented.

Hearing protector's distributors shall be available on site where the presence of such activities is.

Contractor must put in place these control measures:

- machines and apparatus construction must comply with the latest technical developments (ex: vibratory driver high frequency);
- Periodic maintenance of machines and equipment with internal combustion engine according to the manufacturer's instructions;
- in the choice of the location of the machines and stationary equipment must be privileged maximum distance respect to who is sensitive to noise;
- Noise and vibration measured outside the site must be in compliance with applicable Law minimizing the impact on sensitive targets;
- Installation of provisional acoustic panels;
- Noise emissions check shall be ensured by Contractor through fixed and portable measurement on site.

13.7. BIODIVERSITY

Preventive measures to preserve biodiversity on site have to be taken in compliance with applicable Law, authorizations and permits as well as the provisions of the approved Environmental Management Plan report (EMPr) including the recommendations and the mitigation measures in the Environmental Impact Assessment report (EIAr) and in the specialist studies.

Contractor and the Subcontractors must comply with the following plans:

- Alien Invasive Management Plan. This Plan includes mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal management of alien species is undertaken;
- Plant Rescue and Protection Plan, which allows for the maximum transplant of conservation important species from areas to be transformed;
- Re-vegetation and Habitat Re-habilitation Plan.

Contractor must ensure the protection of native animal species and in the case of injury during the work activities shall be ensured the veterinarian care.

13.8. SUSTAINABILITY WORKSITE AND SUSTAINABLE PLANT

ENEL as renewable energy producer contributes to sustainable development. The widespread generation from water, sun, wind and the Earth's heat favors the self-sufficiency of nations while supporting environmental protection.

However, ENEL's approach to sustainability is not limited to its intrinsically "green" nature, but also promotes a strategy that integrates sustainability into business processes and in the entire value chain.

Any sustainable initiatives on voluntary bases or required by the authorization must be reported to ENEL and keep under monitoring by dedicated KPI. ENEL will manage the communication campaign about the initiative.

ENEL might require Contractor to participate and collaborate in the implementation of a "Sustainable Construction site" and "Sustainable Plant".

14. REPORTING

14.1. SAFETY, ENVIRONMENTAL AND SUSTAINABILITY KPI's

In order to have a fully control of the safety, environmental and sustainable initiatives performance of the Work Site ENEL require to Contractor and to Subcontractors to implement a system of HSE aspects



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

39 di/of 49

reporting, based on the following instructions:

- Worker's attendance record: record of the workers and supervisors present on site, including the number of worked hours. The weekly attendance record must be submitted to ENEL within the end of the week following that for which the data are collected.
- Vehicles attendance record: record of the vehicles presents on Work Site. The weekly attendance record must be submitted to ENEL within the end of the week following that for which the data are collected.
- Minute meeting: the minute meeting of each Safety and Environmental meeting must be submitted to ENEL within 48 hours of the meeting.
- Audit report: each audit undertaken by Contractor must be submitted to ENEL within 48 hours from the audit.
- HSE initiatives record: record of the attendance or of the performance of HSE initiatives must be submitted to ENEL as by instruction given.
- Incident reporting: Contractor must notify any incident or event on Work Site, following the instruction of ENEL HSE Terms.

ENEL reserves the right to require the use of standard format for the above listed reporting.

Regarding Environmental reporting, ENEL requires in a monthly basis the followings:

- Electricity Consumption [MWh];
- Energy generated on Work Site by renewable sources [kWh];
- CO2 Compensation [Kg];
- Fuel consumption (Gasoil/Diesel[t], Gazoline[t], LPG[t], Natural gas [m3*103], Biodiesel/Alcool) ;
- Total amount of traffic flows (number of access/crossing of the Work Site main gate) related to the supply of the site materials;
- Expendables* [t] (Concretes, Sand and gravel for construction activity, Iron, Cement and lime for construction activity, Steel Structures and pipes, Bar for concrete, Hydrochloric Acid, Caustic soda, Biodegradable and Non-Biodegradable Lubricating oil, Dielectric oil, Oil containing PCB, Other Non-biodegradable oil);
- Soil/Rocks* [m3]: Excavated soil in Work Site, Conveyance soil reused in Work Site, Contaminated soil rehabilitated in Work Site;
- Water consumption (potable water/non-potable)[m3]:from surface water (rivers, lakes, meteoric waters which do not join the industrial waste waters, etc.), from wells, from aqueducts, from waste water treatment plants;
- Discharged wastewaters [m3];
- Polluting load in discharged wastewaters [Kg], metal and compounds (expressed as metal equivalent), total nitrogen (expressed as N), total phosphorus (expressed as P), Chemical Oxygen Demand, Biological Oxygen Demand);
- Accidental spills or leakage of liquid ground [n., m3];
- Other environmental incidents (numbers of dead animals, birds, bats, etc.) excluding spills or leakage [n.];
- Areas occupied by reclamation land [m3];
- Domestic waste total amount production [t], and total amount recycled or reused [t];
- Non-Hazardous special waste total amount production [t], and total amount recycled or reused [t];
- Hazardous special waste total amount production [t], and total amount recycled [t];
- Extent of Work Site (surface occupied by construction activities [m2]);
- Quantity of ground excavated* [m3];
- Other environmental or sustainable KPIs could be requested by ENEL.

15. CONTRACTORS AND SUBCONTRACTORS

Enel, in its procurement process, relies on qualified suppliers for works, goods and services, able to ensure adequate levels of reliability and quality. This shall be ensured by Contractors in compliance with the Enel HSE Terms.

To obtain the qualification for a specific Merchandise Group, the Supplier shall meet the following



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

40 di/of 49

requirements, approved by Enel Qualification Committee, considering an evaluation based on the assignment of a summary score focused on the Supplier performances regarding:

- legal and integrity requirements: depending on the legislation in force in the Country of interest or on the internal procedures of Enel.
- economic-financial requirements: the economic-financial reliability is evaluated by means of several indicators defined by Enel. .
- sustainability requirements: the compliance with the sustainability requirements is evaluated by means of several indicators defined by Enel HSEQ.
- technical requirements: Enel process owner coordinates the definition of the technical requirements, identified by the relevant BL/Country and specific for each Merchandise Group.

Any Supplier complying with all the above requirements, ascertained also through on site visits when required, is included in the Qualified Supplier List.

As general rule, for all works or service activities a Contractor can realize it with a subcontractor, as long as not differently agreed during the tender phase, as stated in the main contract and according to local legislation.

The Contractor, for all subcontracting levels, has to manage, organize and supervise all subcontractor activities in terms of safety and environment protection

The amount of subcontracted work as a percentage of the total value of the contract, as well as the permissible level of subcontracting, shall be authorized by Enel and stated in the main contract, according to local legislation and Enel global policy.

When an activity has to be performed by a subcontractor, at least the following documents shall be submitted by Contractor to the Enel Unit in charge of the approval:

- Insurance of the Contractor relevant to the subcontractor coverage (If not compliant, the Contractor must modify the insurance policy, according to the contractual clauses);
- Risk assessment for each activity to be subcontracted (low, medium, high risk), taking as reference the risk classification of subcontracted activities;
- HS Questionnaire filled for each proposed subcontractor with medium and high risk activities;
- Self-declaration of compliance with the technical requirements for each proposed subcontractor;
- Company Registration Certificate by the Chamber of Commerce or equivalent Declaration of Company's compliance with the obligation to pay Social Security, Welfare and Insurance contributions Self-declaration of absence of conflict of interest Draft/copy of the subcontracting agreement (in accordance with local law);
- Self-declaration stating that the specific Ethics, Safety and Confidentiality clauses applicable to the Contractor are reported in the subcontract agreement;
- Any other contract/local Law requirements.

In case the Contractor submits, just following the Contract awarding, a list of subcontracts (short list including: subcontract name, activity description, presumed start and completion date of subcontracting activities, percentage with respect to the total scope and tax code), the documents stated at point 1,2,3 and 4 shall be anticipated.

When the subcontractor is qualified for the relevant activities, the Enel Unit will not check the points 2, 3, 5 and 7 already approved during the Qualification process.

16. SPECIAL REQUIREMENTS FOR HIGHER LEVEL RISK ACTIVITIES

For the activities with a higher level risk ENEL reserves the right to request and approve an expert (third party) with the aim to plan, coordinate and supervise the execution of difficult activities.

16.1. EXCAVATION AND TRENCHING

An excavation is any man-made pit, trench, holes or cut into the ground formed by the removal of earth. All excavation and trenching operations shall be performed under the supervision of the Foreman and all requirements including excavation plan and the material disposal authorization shall be met.

- Excavations must be carried out and protected with measures aimed to avoid falls, dislodgment of materials, person buried or trapped in;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

41 di/of 49

- Excavation must be fenced with strong, visible, robust fence. No load or materials must be left on the edge of the excavation;
- Sides of excavations must be clean and neat;
- Drilling holes must be covered, signalized and fenced;
- Locations of cables, communication wires and other underground Hazards such as pipelines shall be established and marked prior to beginning excavation or trenching operations;
- In case of excavation at the edge of a track/road, that has an impact on the movement of the vehicles, the traffic must be managed with two flagmen or with traffic lights;
- It's required a schedule, to be updated with the progress of the activity, of the excavated soil and the re-used soils, if authorized by local Authority;
- If an excavation or trench endangers the stability of buildings or walls, shoring, bracing, or under pinning will be provided;
- All excavations must be on register and inspected daily before work commences and after inclement weather by Contractor, declared safe and his findings noted in the said register;
- No work shall commence in an excavation unless the excavation has been declared safe by the Contractor and authorized by ENEL.

For further detail, consult "Management of excavated soil and rocks at Work Site".

16.2. HOT WORK ACTIVITIES

Hot work is defined as welding, flame cutting, burning, grinding or using a torch. Each Contractor working on the Work Site must have a hot work program, including a permit to work process, when scheduled.

Generally hot work should be performed in a shop, outside the facility, or in a "Safe Welding Area" ("SWA"). If not possible a SWA shall be established on Work Site, implementing the measures listed below:

- All welding and flame cutting operations shall be done in the established SWA unless otherwise authorized.
- SWA's shall be located with a safety distance from heavily vegetated areas, combustibles (stored oil, diesel, etc.), and on a non-combustible surface. If there are oil and gas facilities in the immediate vicinity, such as pump jacks or pipelines or tank batteries, SWA's shall be at least one hundred (100) feet/ 35 m away from such facilities.
- If hot work needs to be performed, all movable fire Hazards in the vicinity shall be removed to a safe distance or guards used to confine the heat, sparks and slag and to protect the immovable fire hazards.
- The hot work equipment and work area shall be inspected prior to beginning any hot work operations to ensure safe working conditions. This includes checking for explosive atmospheric conditions in all vessels piping and confined spaces. Only certified personal/welders shall be permitted to perform hot work.
- When performing hot work all the fire protection must be taken, and reported in the "Hot Work Program". (i.e. Fire extinguishers equipment, fire watch after competition of hot work, water truck if there is potential for the spread of fire)
- Operators shall wear brominated uniform and get a person with fire blanket and fire extinguishers ready for the use;
- Regarding windfarm it must be stressed that inside a nacelle is forbidden the use of all welding and flame cutting operations.

16.3. WORK AT HEIGHT

Work at height means work activity (including temporary works like load unload) exposing workers to the risk of falling from a height of more than 2 m from a stable level (This height of reference can be lower according to the local legislation) The risks involved in work at height can be linked with the following categories:

- Falls from height
- Objects falling from heights
- Interferences

The following are key rules for safe working and to minimize the possibility of an Incident during



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

42 di/of 49

operations at height:

- Identify and use the most appropriate equipment in relation to the work to be performed and the risks involved
- Install scaffolding in compliance with legislation and good practice
- Always clearly define the work area
- Prevent transit below the area and ensure proper handling of materials at height
- Use PPE and CPE correctly

16.3.1. Fall life line

Where is not possible to eliminate or isolate fall from height risk Contractor shall design and install a fall protection system.

Fall protection system and fall prevention equipment shall be inspected and maintained in accordance with the manufacturer's recommendations and at the frequency required by local Act. Contractor shall:

- Provide training and step-by-step instruction for installation
- Perform the final and periodical inspection of the system
- Perform any required load testing
- Provide end user training
- Provide all documents certificate required by the Law

The length of the retention ropes must be proportionate to the height of the fall and its anchor points shall be placed in a highest point, and in case of moving with double anchor point. Moreover, in case use of the rigid or flexible anchorage line, that must be adequate of at maximum workers number.

16.3.2. Guardrail/Parapet

Guardrails/Parapets are designed barriers erected to prevent workers from falling to lower levels for instance installed in proximity of an excavation area and shall be secured when installed to prevent accidental displacement by wind, equipment, or workers, etc.

16.3.3. Scaffolding and mobile scaffolding

Scaffolding shall be used when appropriate. All scaffolding shall be erected according to the applicable Law. A competent and certified person has to be appointed as responsible for scaffolding. If the scaffold has a different shape from the one calculated and certified a dedicated design shall be done. Any Contractor using or constructing scaffolding must have a safety procedure for scaffolding work that includes the items below:

- Contractor shall maintain update a register with a map of all scaffolding on site, an appropriate tagging system specifying the status (Assembled/Safe or Under assembling/Unsafe); List of personnel appointed by Contractor for the assembling, use and dismantling of the scaffolding. (Check of scaffolding at the beginning of each shift);
- Instructions for assembling and dismantling;
- All scaffolding shall be inspected by Contractor on a daily basis as a minimum and also before use follow adverse weather conditions that could have made the scaffolding unsafe e.g. rain, wind which could cause the ground conditions to be unstable. The maximum load shall be indicated at the entrance. Each inspection must be recorded;
- Users of scaffolding shall carry out visual inspection on a daily basis before use. If unsafe conditions are found or suspected, scaffold shall be isolated until thorough inspection has been made by competent inspector;
- Scaffolding shall be electrically grounded for each 20 meters high with a minimum cross section cable at last 25 mm²; all scaffolding must be assembled with homogeneous and resistant materials. Where scaffold materials are used they shall be clean and corrosion free and free of incipient faults. Scaffold boards will be free from twists and splits and will not be painted;
- Climbing or working from the handrail, mid-rail, or brace members of the scaffolding is forbidden;
- Scaffolding and mobile scaffolding must be in good condition, placed in a stable position (with platform completed, toe boards, middle-rail and top-rail at 1 m);
- Scaffolds that provide access to areas where personnel can fall into a Hazard or from a height of greater than 1.8 meter shall install a trap door at the access point to working area;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

43 di/of 49

- List of PPE to use and signals (in assembling and dismantling);
- A signboard on the scaffolding must be displayed on which lists the compliance about the verticality, anchor points and completeness of all elements. Moreover it must contain the name of Responsible.

In case of PV power plant Contractor and Contractors must provide a mobile scaffolding, or a safe mobile equipment for the installation of the panels installed in the highest level of the structure. Risk assessment and method of statement must include the use of the mobile scaffolding in the panels' installation procedure. In case is needed a scaffolding higher than 10 m or with a particular geometry (not standard) a structural project is required.

Portable ladders are not "workplaces" therefore activities being on them are prohibited. For this reason, portable ladders are banned and their use is allowed only by specialized personnel in charge of installing scaffolds.

In above mentioned points, local law applies if these are more restrictive.

16.3.4. Lifting Platform

Truck with Lifting platforms shall be used when appropriate. Only trained and qualified personnel shall operate the lifting platforms.

- Training shall be conducted for the operator
- Contractor shall provide written certification to ENEL for each employee who might operate a lifting platform.
- All truck with lifting platforms shall be strictly maintained in accordance with the manufacturer's recommendations.
- Personnel shall not ride on lifting platforms.
- The lifting platforms shall have warning lights, appropriate lights if used at night, and an alarm signaling when the vehicle is backing up.
- When a lifting platform is left unattended, the lifting platform shall be fully lowered, controls put in "off" or "neutral" position, the power shut-off, and the brakes set. Wheels shall be locked if the lifting platforms is parked on an incline. Ignition keys shall be removed and stored in a secure place.
- The lifting platform operator shall ensure that the lifting platform's wheels are properly chocked before unloading.
- Harness shall be worn when operating equipment.
- In case of slopes and irregular ground the operator must be instructed to avoid the overturning of the lifting platform.
- The lifting platform shall not be operated if wind speed overcome the limit indicated by the Manufacturer.

16.4. MATERIALS LOADING/UNLOADING

All loading and unloading operations must be accompanied by the lifting plan. The transported loads must be pre-arranged with attachments and slings in order to avoid worker exposure to the risk of falling from above. Otherwise, to reach the lifting positions, the lifting platform will have to use PLE.

16.5. CONFINED SPACE

A "confined space" is defined as a space (not necessarily closed):

- not intended for continuous human presence;
- with inlet/outlet openings or premises/passages of small dimensions (which cause difficult emergency management);
- where a Hazardous atmosphere can be suspected.

Confined spaces, for example, include: storage tanks, silos, underground systems, tunnels, drainage pipes, condensers, feed water heaters, underground vaults, chemical tanks, cavities, boilers, blades, hub, etc. Such spaces may present unfavorable ventilation conditions or other risk factors such as poor visibility



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

44 di/of 49

and/or communication difficulties, the presence of Hazardous and/or flammable and/or explosive materials.

The atmosphere in confined spaces may involve a number of risks (e.g. both toxic and explosive) without being indicated by warning signs such as strong smells or irritating effects. These areas of work require the installation barriers and safety signs to prevent unauthorized entry.

The following are key rules for safe working and to minimize the possibility of an incident during operations in confined spaces:

- Clean up the area (purging, inserting, flushing, or ventilating the work area as necessary to eliminate or control atmospheric hazards before starting activities and monitor safety conditions;
- specifying acceptable entry conditions and monitoring safety conditions throughout the duration of the activities;
- Verify the availability of Communications equipment, Lighting equipment, rescue and emergency equipment;
- Do not enter in a confined spaces until all necessary checks have been carried out;
- Personnel involved must be educated and trained on use of required PPE and collective protective equipment;
- Continuously communication with worker inside confined space must be assured.

Additional measures for monitoring the air quality have to be provided by Contractor if required by ENEL.

16.6. ELECTRICAL SAFETY

The HS Plan shall address and minimize personnel exposure to electrical Hazards through effective equipment operation, design, specification, installation, and maintenance. All electrical Contractors working onsite shall have an electrical safety program, including a permit to work process, which meets the requirements below.

- Electrical Safe Work Practices: All electrical work shall be done in accordance with the latest codes, standards, and regulations;
- Only qualified personnel with valid proof or certificate of electrical knowledge with code requirements, safety standards, and experienced in the type work may work on electrical circuits and equipment;
- All live electrical work requires a live work permit. A qualified person shall discharge all stored electricity and shall verify the equipment is de-energized and proper Lockout/Tag out procedures implemented prior to beginning electrical work;
- Power Lines: All power lines shall be considered energized unless proper measures have been taken to de-energize;
- When work is performed near energized overhead power lines, equipment such as boom, mast, crane, or its load shall never be permitted within evaluated distance limit from the power lines.

A site electrical installation, even if considered as provisional, must be planned and made in a proper manner using materials and industrial electrical components in order to ensure the proper functioning of the equipment and employees integrity. A dedicated document is available explaining the minimum requirements for the electrical rules in a temporary site.

16.6.1.

COMMISSIONING ACTIVITY

The commissioning activity is one of the most complex and difficult activity both from the organizational and operative point of view. Before carrying out any operation on electrical systems or other activities near their, the risk assessment must be carried out. This assessment must specify how the activities performed and what security measures and precautions should be taken to ensure the safety.

All personnel involved in work on or near electrical installations must be instructed on the safety requirements applicable to their work. The personnel involved must be comply with these prescriptions, rules and instructions.

In particular:

- No person shall be admitted in the Commissioning restricted area if not authorized. A list of persons authorized shall be exposed at the entrance of the Commissioning area. A lot of warning signal informing about electrical Hazard and allowed entrance only for authorize people shall be placed;



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

45 di/of 49

- The commissioning activities, although not required by applicable Laws, shall only be carrying out by qualified personnel who has been trained and possess a qualification that meets the standard as indicated in Permit To Work and LOTO and applicable procedures and shall not be performed without ENEL's approval;
- When applicable Laws require specific qualifications, Contractor in collaboration with HS staff of ENEL must ensure that these requirements meet standards in particular Permit To Work and LOTO and applicable procedures provided by Commissioning Manager and made available to Contractors;
- No person shall be engaged in any work activity requiring technical knowledge or experience to prevent electrical Hazards or injuries without such requirements and without the supervision that the work requires.

16.6.2. Construction of Medium and High Voltage aerial line

In order to ensure adequate safety standards for employees involved during the construction and safe use of tools and machines, following and for further detail defined in the general criteria to be applied during the construction of MV/HV overhead lines.

The construction of an overhead power line is one of the most complex and difficult activities both from the organizational and operative point of view. The multiple interferences that may be arising along the route of the power line (power and telephone lines above ground or below ground, buildings, roads, rivers, etc.) linked to the morphology of the territory and climatic conditions, greatly increases the specific risks related to the activity.

Contractor shall therefore ensure that the following conditions are met:

- The employees involved in the activities have to be highly skilled, trained and suitable from health point of view;
- Tools, equipment and PPE used must be suitable, efficient and checked before and after use. In case of any deformation or weak points (cracks, fractures or other defects), the tools must be immediately replaced;
- The main Hazard for the employees involved is falling from height, which can be managed adopting proper behavior, using proper equipment and PPE's and respecting the work procedures. The risk of falling objects is constantly present and should not be overlooked;
- To minimize the interferences between workers working at height and those positioned at support base;
- All equipment used at heights, must be secured with ties or chains in order to prevent an accidental fall to the ground.

To ensure adequate emergency management and taking into account that the construction of high-voltage lines generally takes place away from the site camp medical center it is important to ensure on site or in surrounding area, trained first aid team and fully equipped ambulance.

The safe execution of the works on MV and HV overhead lines requires work planning, activities coordination among the employees involved, respect of operating procedures and use of proper equipment and PPE.

16.6.3. Overhead Power-lines/ Underground Pipelines / Aboveground Flow-lines

In case of transmission line crossing on site and/or access road Contractor must put in place any reasonable measure aimed to avoid any kind of risk of crush with vehicles (barricading, gates, etc.). Below the minimum requirements:

- Identification of the height of the line;
- Establishing of the limit height for a safe cross;
- Placement of portal before the rail or PL crossing;
- Warning signals to be erected and visible;
- Specifics Safety Awareness meeting about the topic.

In case of underground pipelines point out their presence, to avoid any accidental hit. In case of risk of explosion and/or leakage of chemical materials it could be required the presence of fire fighter or skilled personnel of the provider.

16.6.4. WORKS ON PUBLIC ROADS AND TRAFFIC INTERFERENCE management

As "Road Works" are meant all the activities that represent an anomaly for ordinary roadway.



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

46 di/of 49

The contractor, during the evaluation of road works activities, must take into consideration the specific risks including, but not limited to, the following safety risks:

- workers involved in the construction activity, both in the specific work topics and for the vehicular traffic interference;
- people and vehicles passing near the works site;
- type of road and the type of traffic;
- eventual interactions between the different components of permitted traffic (eg public and / or private transport, residents, pedestrians);
- interference with existing roads;
- investment of workers;
- impact with people outside the works sites and with vehicles;
- projection or material fall during particular working phases.

The contractor is obliged to comply with the main rules to promote safety and to minimize the accidents possibility during operations.

Below reported in non-exhaustive list:

- Initial point of the work must always be promptly pre-signaled and guaranteed with solid guards;
- In relation to the work type and the road category, the most suitable type of pre-signaling must be identified and agreed (for example, flag with one or more operators, mechanical flagman, timed traffic light systems, message panels, luminous devices or similar devices, pictograms,...).
- At the start and the end of work site, the signaling must indicate the preparation of adequate approach, position and prescription;
- The contractor is obliged to ensure solid protections for vehicles and operators involved in the activity (with metal barriers and / or new-jersey), in particular at the start and the end of work site;
- Excavations must be protected by fences and barriers to be placed for each individual part;
- Adequate flexible marking and / or delineators must be used to the entire part affected by the activities;
- The contractor is obliged, except in exceptional cases and in any case agreed with Enel, to close the excavation sections at the end of the working day;
- The contractor, even at night, is obliged to diligently remove any deposit or waste from the road section;
- The contractor, even at night, is obliged to provide adequate regulatory danger signals (including luminous devices or similar devices), as well as solid shelters to ensure public safety;
- The contractor is obliged to efficiently maintain the prescribed signals during the works.
- It is mandatory for supervisors and workers to receive specific training in compliance with the local laws and standards;
- The contractors shall provide workers with personal protective equipment (PPE) compliant with the reference standards. High visibility clothing must comply with the local laws and ENEL requirements.

17. DOCUMENTATION AND INFORMATION TO BE PROVIDED BY THE CONTRACTOR

Listed below is all the HSE documentation treated in this document and which the Contractor must present to ENEL before the start of the on-site activities. Enel may request further additions and clarifications from the Contractor in order to validate the documentation.

- Health & Safety Plan
- Risk Assessment
- Lifting Plan
- Excavation Plan
- Environmental Plan
- Storm Water Management Plan
- Erosion Management Plan
- Waste Management Plan
- Emergency Plan
- All the appointments (including officers, HSE Coordinator and Foreman) and relative training



certificates (required by the applicable Law)

- Traffic management Plan
- Action Plan of Risk pandemic

18. INSPECTION AND MONITORING

18.1. PERFORMED BY CONTRACTORS

Contractor shall implement a system to ensure the constant monitoring of the HSE level on Work Site.

- Inspections: Contractor and Subcontractors shall perform frequent inspections as required by the activities of the workplace to identify potential Hazards and work process verification. Contractor and Subcontractors shall ensure that visual inspections of tools and vehicles are performed daily, or prior to the start of each shift. Monthly documented (auditable) inspections of tools, equipment and vehicles shall be performed;
- Audits: Contractor's safety and environmental officers shall perform periodic Work Site audits (minimum bi-weekly) to verify the implementation of the HS plan and Environmental Plan. Jointly they shall perform a documentation review. Report of the audit must be kept on Work Site and submitted to ENEL within 48 hours of the audit;
- HSE Meetings: Contractor shall held weekly HSE meeting, with the presence of ENEL and Subcontractors representatives, in order to manage ongoing activities, and to avoid any interference. In interference management meetings, the assessment of interference risks must be updated. In the meetings, information about risks is provided to each worker that the work phases may involve with particular reference to the interferences between activities and processes that can take place simultaneously;
- If new risks from interference and prevention measures other than expected emerge, a new assessment is made during the meeting and recorded in the minutes.
- The minutes of the meetings must include at least:
 - date of the meeting;
 - names and signatures of the participants;
 - topics covered, including (list of activities; areas concerned; special processes (if any));
 - assessment of the risks from interference with indication of the measures to be adopted for management, ENEL may require additional HSE meetings if necessary for the proper management of the HSE aspects on Work Site;
- HSE Meeting shall be held whenever a new Contractor starts to work.

The contractor must also ensure that supervision inspections by Enel, external consultants, third parties, are always carried out in safe conditions through prior communication of information on the risks present on the site, supply of PPE and instructions to be followed in case of emergency.

If requested by ENEL, Contractor must provide a radio controlled "drones" device equipped with a camcorder for safety inspections at height. The user manual and battery charging system must be included provided for each device.

18.2. PERFORMED BY ENEL

In order to check compliance with HSE obligations ENEL has the right to carry out periodic inspections on site also known as:

- ECoS (Extra Check on Site);
- HSEQ Walks;
- Audit (internal and external by Certifier);
- Internal H&S and ENV inspections.



Contractor and Sub-Contractors shall timely cooperate with related actions carried out by ENEL. Contractor is required to ensure the prompt resolution of any evidences found;

To allow the correct conduct of inspections ENEL's personnel and/or third parties authorized by ENEL shall have access at any time the Work Sites,

Contractor's premises, warehouses or storage areas to carry out the above-mentioned checks and verifications.

Moreover, Enel reserves the right to verify at any time also all the authorization documents and permits produced by the contractor in the field of Safety and Environment in compliance with local laws.

19. CONSEQUENCES OF BREACHES REGARDING HEALTH, SAFETY AND ENVIRONMENTAL REQUIREMENTS

ENEL has the right to apply, by notifying the Contractor by registered letter with proof of receipt (or similar instrument of communication with proof of receipt), the sanctions for HSE violations relevant the specific Country.

- If the breaches cause any Accident or High Potential Incident, that could have caused a fatal/severe personal injury, as is reasonably in whatever way is ascertained by ENEL, that the Contractor or Subcontractor holds clear accountability on Health and Safety breach, ENEL reserves the right to apply a sanction - the which value depending on the severity of the violation and/or injury and/or damage to persons.
- Regarding environmental incident, if Contractor breaches an obligation, as provided by Law or by the Contract, on Environmental protection, the Contractor shall indemnify ENEL for, and hold ENEL harmless for, any loss or expense that ENEL may sustain or incur as a consequence of event.

See the dedicated section of the Enel HSE Terms.

20. SECTION – ANNEXES

Various technical notes below are available for Contractors and sub-contractors (from Annex A to G) in order to guide the Contractors in the correct application of the requirements.

- A. MINIMUM REQUIREMENTS FOR TEMPORARY ELECTRICAL INSTALLATIONS OF WORKSITE
- B. MINIMUM REQUIREMENTS FOR EXCAVATED SOIL AND ROCKS MANAGEMENT AT WORKSITES
- C. MINIMUM REQUIREMENTS FOR MANAGING AREAS OF WASTE/MATERIAL REMAINING AT WORK SITES
- D. MINIMUM REQUIREMENTS FOR WASHING OF VEHICLES AT WORK SITES
- E. MINIMUM REQUIREMENTS FOR REFUELLING OF VEHICLES AND MACHINERY AT WORKSITES
- F. MINIMUM REQUIREMENTS FOR WORKS AT NIGHT IN WORK SITES
- G. MINIMUM REQUIREMENTS FOR CONSTRUCTION OF MV/HV AERIAL LINE AT WORKSITES

21. ENEL REFERENCES

In addition, upon specific request from the Contractors, ENEL makes available its internal documents (Operating Procedures, Guidelines, etc.). containing information that may be accessed by all employees of Enel Group (e.g. Organizational Directives, Policies, Procedures) entering in the Documental Portal of Enel it is important remind that information classified as Internal can be disclosed outside the Enel Group complying with the "need to know principle" (in any case in accordance to Group PL 33 rev 2 "Information, Classification and Protection").

These useful information can also be used by Supplier to update or to issue proper own procedures and for further information on its operating methods regarding the following topics:

- Policy No. 2 "Pre-Job Check and Post-Job Review";
- Policy No. 141 "Guideline for worksite emergency plan";
- Policy No. 203 "Guideline for Emergency Management";
- Policy No. 367 "Environmental Aspects, Impacts and Risk Assessment";



EGP&TGX/HSEQ

CODE

EGP&TGX_ALL_QSE_GS_001_v.03

PAGINA – PAGE

49 di/of 49

- Policy No. 380 “Safe use of mobile phone at work”;
- Policy No. 473 “Guideline on Waste Management”;
- Policy No. 474 “Biodiversity”
- Policy No. 1150 “Guidelines safety and environmental inspections”
- Policy No.1153 “Stop work policy”;
- Policy No. 1225 “Permit to work”;
- GL No. 01 “HSE Meetings in Construction Sites”;
- GL No. 02 “Management of site HSE signs”;
- GL No. 03 “Traffic Management Plan in construction plan”;
- GL No. 04 “HSE Induction in E&C construction site”;
- GL No. 17 “Environmental Issues management in power plants decommissioning”;
- GL No. 18 “Machinery Management”;
- GL No. 29 “Classification communication and analysis of environmental events”;
- GL No. 35 “Road construction risk assessment in E&C worksites”;
- GL No. 39 “Road Safety Guideline”
- GL No. 40 “Guideline for operational monitoring for bats and birds at wind energy facilities”
- GL No. 42 “Environmental Aspects Impacts and Risks assessment”;
- GL No. 44 “Hazardous substances spills management and prevention”;
- GL No. 48 “Power Plant Sustainable Repurposing”;
- GL No. 51 “Safety Requirements for Excavations”;
- GL No. 52 “Execution of activities in confined or restricted spaces”;
- GL No. 53 “Prevention Strategies for Impact with Object Risk”;
- GL No. 54 “Safety Requirements for Lifting and Pulling”
- GL No. 55 “Safety Requirements and Organizational measures for Entrapment Risk”
- GL No. 56 “EGP&TGX Safety Requirements and Organizational Measures for Interference Management”;
- GL No. 59 “EGP&TGX Health & Safety Risk Assessment”;
- GL No. 60 “EGP&TGX Guidelines on Safety Requirements and Operational Measures during Electrical Works”
- GL No. 61 “EGP&TGX Guideline on works at height”;
- GL No. 62 “HS requirements for Robotized activities”.