

## **Major Accidents Prevention Policy of Ecoslops Portugal S.A. (MAPP)**

### **1. OBJECTIVES**

Ecoslops Portugal, S.A. is committed to achieving the highest standards of safety and protection of the environment in its facilities.

The company recognizes that the nature of its activities creates risk of accidents with possible serious consequences on Persons, on the Environment and on Buildings and Equipment and that it has the obligation to reduce risk levels as much as reasonably practicable.

The company further considers that:

- › all accidents are preventable;
- › the achieved safety performance reflects the professionalism of its management and employees.

In order to meet its obligations to its employees, customers, visitors, adjacent facilities, neighbour population, and other stakeholders, Ecoslops Portugal, S.A. will implement, monitor and maintain a Safety, Health & Environment (SHE) Management System. This system encompasses measures for the Prevention and Mitigation of Risks associated with Major Accidents.

The SHE Management System (SMS):

- › Identifies the roles and responsibilities in the management of hazards;
- › Identifies and provides for the training needs of staff and contractors;
- › Identifies and evaluates the probability and severity of hazards associated with the facilities and the operations;
- › Identifies emergency situations and scenarios and tests and reviews the implemented emergency plans;
- › Implements procedures and instructions for a safe, clean and reliable operation; Does the management of changes; Provides for systematic audit, review of the MAPP and SMS;
- › Monitors the performance in meeting these objectives and goals.

These criteria exemplify the company commitment to implement and maintain a Safety Management System.

The Company Management has the responsibility to ensure that all necessary resources are available to achieve the Company objectives in terms of Safety and Protection of the Environment.

The Facility Management has the authority, responsibility and means to locally implement the SMS, take all necessary actions to correct unsafe situations, remediate consequences of accidents and improve prevention.

This Policy is known, understood, developed and maintained at all levels of the organization.

## **2. ORGANISATION, PERSONNEL & TRAINING**

All employees are reminded that a safe and responsible behaviour is a condition of employment at EPSA.

The Management of EPSA is responsible for ensuring that:

- The organisational structure is appropriate to minimise the risk of accidents and to minimise the consequences should one occur;
- Employees, subcontractor personnel and other service providers are aware of the potential for major accidents in the installation and are trained in all procedures needed to ensure that the company Policy objectives are met;
- Employees are informed of their responsibilities in the prevention and management of major accidents and these responsibilities are clearly described in written procedures;
- Employees are selected and trained to ensure that they have the necessary skills and experience to perform their duties, prevent accidents as well as respond to one;
- Employees have access to the necessary safety information and to Material Safety Data Sheets (MSDS) for all products used or produced in the facility;
- Feedback from the employees is encouraged on safety and accident prevention issues. They are also encouraged to report all unmanaged risks or safety concerns they may identify during their activities.
- Employees are involved in the SMS reporting and auditing process;
- The necessary resources are made available for the training of managers and employees concerning the prevention of accidents, including serious accidents with dangerous substances.

The Safety Manager of the installation (or his nominee) will be responsible for setting and fulfilling the training program for employees and service providers.

## **3. IDENTIFICATION AND EVALUATION OF THE RISKS OF MAJOR ACCIDENTS**

The implementation of the SMS ensures that:

- Hazards arising from normal and abnormal operations are identified and their probability and severity assessed;
- The identification and evaluation of hazards covers all phases of the operations, including storage, product transfer and control of emissions to the environment. It extends to consequences of events originating outside of the installation, including risks associated with abnormal meteorological conditions, flooding, power failure and seismic activity;
- The results of these risk assessments are periodically analysed and areas for improvement are identified, prioritized and the required interventions are scheduled;
- The levels of risk are reduced to as much as reasonably practicable.

## **4. OPERATIONAL CONTROL**

The risk of accidents with consequences on people or the environment is minimized by controlling all aspects of the company operations, namely:

- Written Operating Procedures, Maintenance Procedures and Work Instructions cover all aspects of the operations and maintenance of the facility;
- Procedures and Work Instructions are developed in co-operation with the personnel that is required to apply them;
- These instruments reviewed and updated on a regular basis.

## **5. MANAGEMENT OF CHANGE**

The company considers that changes to the equipment and procedures are not allowed, unless they are managed using a rigorous Management of Change process, ensuring that:

- Procedures are in place to analyse and manage changes in technology and equipment, with the aim of identifying the degree of consistency, coherence and compatibility between the part affected by the change and the whole, in order to eliminate, control and/or minimize the risks arising from its application.
- The management of changes covers both permanent and temporary changes and also includes urgent operational changes.
- New equipment, installation or storage facilities are designed, installed and put in service following specific specifications and procedures.

## **6. PLANNING FOR EMERGENCIES**

Being able to properly deal with the consequences of an accident is as important as preventing it and, with this mindset, the company ensures that:

- An Internal Emergency Plan (IEP) is developed and maintained to detail the required response of the company employees in the event of a major accident. The emergency plan includes, not only, arrangements for contacting emergency services and the people in the neighbourhood of the installation that could be affected, but, also, specific work instructions for the employees that have the responsibility to prompt the immediate response to accident;
- The employees involved in the emergency response are trained under the IEP. This training covers firefighting and first aid, as well as responses to site-specific dangers.
- The IEP is tested by means of regular exercises and appropriate drills and is reviewed periodically in order to ensure its effectiveness.
- The company fully co-operates with the local authorities and emergency services for the planning and execution of emergency responses.

## **7. MONITORING PERFORMANCE**

The facility Management is responsible for properly monitoring the safety performance of the facility and taking all necessary actions to correct unsafe situations, remediate consequences of accidents and improve prevention, namely:

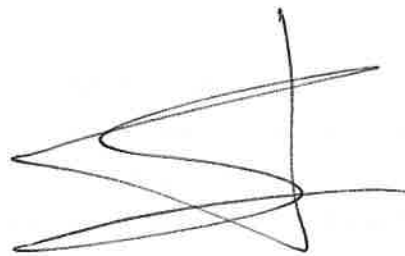
- Accidents and incidents capable of leading to a major accident are systematically reported and investigated;

- Investigation analyses both the immediate causes of the incident and the underlying systemic causes;
- Corrective and preventative actions determined by such investigations are recorded and implemented according to a set deadline;
- Periodic inspections of safety-critical points of the installation, equipment and instrumentation are planned and executed.
- Compliance with the training program and application of safe working practices are also monitored.

## **8. AUDIT & MANAGEMENT REVIEW**

The Company Management is responsible for the overall effectiveness and proper application of the SMS and, in this scope:

- The MAPP and SMS are regularly reviewed by the Company Management (Management Review) for their effectiveness and suitability;
- Regular Internal Audits on the MAPP performance and SMS application are conducted.
- Review of procedures is required in the aftermath of any accident or incident having the potential to escalate to a Major Accident involving dangerous substances.



**Vincent Favier**

President of the Board

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