AIMS
ADRIATIC LNG INTEGRITY MANAGEMENT SYSTEM

Adriatic LNG
Energy for a better future

AIMS Framework Document

Contents

Adriatic LNG

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VISION

To be a world-class LNG terminal enabling new energy supply to Italy and beyond.

MISSION

Be safe and reliable while protecting the environment and maximizing value for all stakeholders.

STRATEGY

Continuously protect operations and safety integrity building on '5 Pillars of Strategy' namely People, Technology, Relations, Reliability and Sustainibility.

AIMS - Adriatic LNG Integrity Management System objective is to preserve personnel safety and operational integrity while maximising efficiency and reliability, embodying the principle of **"No Hurt, No Harm"**.

AIMS KEY REQUIREMENTS

AIMS - Adriatic LNG Integrity Management System establishes a comprehensive and robust framework to protect people, the environment, and includes process safety, while maintaining a license-to-operate. AIMS fosters a culture of continuous improvement and innovation.
These requirements are in adherence to our Organization Vision, Mission, and Strategy.

RISK MANAGEMENT

A fit-for-risk approach is established to ensure personnel and process safety, operations integrity, security and cybersecurity.

A) HAZARD IDENTIFICATION
I. Hazards in our operations are identified and are being assessed against credible risk scenarios that consider credible failure modes.

II. Comprehensive risk assessments are conducted to establish and maintain safeguards.

B) RISK MITIGATION
Risks are mitigated to as low as reasonably possible, to reduce the probability of consequences on people and environment, and to reinforce preventive barriers.

I. High risk activities are defined prior to implementing mitigations.

C) RISK RE-VALIDATION
Changes related to context, organization, people, facilities, and processes trigger re-evaluation of risks.

I. Higher consequence revalidated residual risks are clear and understood.

PEOPLE AND LEADERSHIP

PEOPLE – LEADERSHIP

A) SAFETY CULTURE LEADERSHIP
A culture is fostered where at all organizational levels a commitment to safety and operational integrity is demonstrated through actions, not just words.
I. Managers and supervisors lead by example.

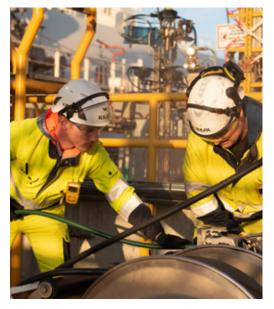II. Everyone is empowered to stop the job for observed or perceived unsafe conditions.

III. Behavior is considered and influenced through Behavior Based Protocols.

B) PARTICIPATION AND REPORTING
There is always open communication and feedback channels on Safety, Security, Health and Environmental (SSHE) matters. All personnel report hazards, near-misses, and incidents without fear of retaliation.

I. Robust reporting and feedback process is established, that encourage a proactive and fully inclusive safety culture.

II. Reporting is incentivized and rewarded through a dedicated program.

PEOPLE – RESPONSIBILITIES AND ACCOUNTABILITIES

Accountabilities and responsibilities for all staff are defined.

A) CLEAR ACCOUNTABILITY

All Supervisors are empowered and accountable.

I. All Managers, and Supervisors, clearly communicate responsibilities and expectations to all organization levels.

II. Effective coordinated communication is established to ensure alignment through functions, rotations, shifts, and contractors.

PEOPLE – COMPETENCY

A) SSHE AWARENESS

Everyone is made aware of risks related to our operations and of our SSHE Policy.

I. A culture of SSHE awareness is fostered, ensuring that everyone understands their role in protecting physical and digital assets and in maintaining healthy preventive barriers.

II. Frequent SSHE awareness campaigns are made.

B) TRAINING AND DEVELOPMENT PROGRAMS

The roles in the organization are fully covered and everyone is enabled to express their full potential to manage SSHE and operations integrity.

I. All personnel are provided with comprehensive role specific training designed to emphasize the criticality of safety and occupational health in daily operations.

II. A process is in place to ensure ongoing competency of workers that are on-task.

III. Professional development opportunities are established to ensure that employees are equipped to meet the evolving demands of the industry and personal growth aspirations.

C) RECRUITMENT AND RETENTION:

I. A strategic recruitment process is established to attract skilled individuals who share the Organization's values on safety and operational excellence.

II. A work environment is nurtured that values employee retention so to minimize loss of competencies, experience, and organization orientated personnel.
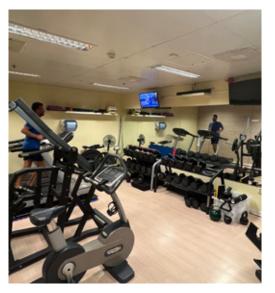
PEOPLE – OCCUPATIONAL HEALTH AND WELL-BEING

a) Organization policies and processes are designed and regularly reviewed to maximize personnel safety and well-being.

I. Our Wellbeing Committee drives interventions that encourage healthy choices on and off the job.

II. All employees have access to independent and confidential consultation for scientifically valid physiological health, mental health, and nutritional advice.

b) Fit-for-work protocols include normal, and emergencies scenario and consider physical and mental abilities.

OPERATIONS EXCELLENCE

A) PROCESSES, PROCEDURES, AND INSTRUCTIONS

Industry leading processes and operating procedures are in place to ensure that operations integrity sustains No Hurt No Harm, remains above compliant, and minimizes nvironmental impact.

I. Processes and procedures are managed day-to-day by supervisors, including superintendents, and are adapted through time due to changes of multiple factors (to operation, equipment, organization), including updated technology.

II. Simultaneous operations, maintenance, and other field activities are strictly coordinated.

III. High Risk activities are defined and are managed from planning to permit authorization, to ensure risks are minimized to an acceptable level.

B) INFORMATION MANAGEMENT, AND INFORMATION TECHNOLOGIES

I. Robust information management practices are established to protect operational integrity, ensuring the ready availability of updated data, and design information.

II. Seamless, robust communication protocols are established within and around all critical operations.

III. Information on applicable laws and regulations is kept current.

FACILITIES AND ASSET INTEGRITY

Asset and related equipment are maintained to assure safety and operational integrity through time. Robust *process safety* controls are in place to prevent accidents. All Organization premises are kept in compliance.

A) PERFORMANCE MONITORING

I. Real-time monitoring and data analytics are utilized to optimize operational integrity, efficiency, and promptly address issues.

II. Condition based monitoring systems provide asset integrity health and are focused on ageing and degradation.

B) MAINTENANCE AND EQUIPMENT INSPECTION

I. The highest level of operational integrity is achieved through a strict schedule of maintenance and inspection.

II. A risk-based approach is adopted to develop predictive equipment maintenance strategies and deploy asset integrity programs through a dedicated system of facilities integrity management.

C) MATERIALS AND QUALITY MANAGEMENT

I. Planning, procurement, and controls are in place to ensure that the right material is available at the optimal time, optimal quantity, and at the optimal cost.

II. Spare parts availability is tailored according to asset criticality assessment.

CONTRACTORS INTEGRATION AND PARTNERSHIP

Contractors are effectively integrated and assimilated throughout the entire life-cycle of the service provided, unless specified otherwise. A culture of collaboration is fostered, including the holding of a joint accountability on SSHE and operations integrity performance.

A) SELECTION BASED ON PERFORMANCE

I. A rigorous contractors selection and interface process is established to ensure that contracted providers meet our requirements on safety, security, health, environment, operations integrity, regulatory compliance, and industry standards.

II. Contractors selection criteria is based on SSHE and technical qualification, and only then to cost criteria.

B) COLLABORATIVE RELATIONSHIP BUILDING

Apply a fit-for-risk approach to establish partnership and drive performance.

I. Critical contractors are an integral part of the System in terms of engagement, and SSHE performance is stewarded through interfaces at all levels.

II. Critical contractors must establish the highest standard of interface process with their critical subcontractors.

C) CONTINUOUS MONITORING AND EVALUATION

Contractors performance is continuously monitored and assessed.

I. All contractors are expected to work in a responsible way.

II. Ongoing performance evaluation, reviews, and periodic assessments are conducted to ensure continuous adherence to our requirements.

MANAGEMENT OF CHANGE

Changes are actively sought to drive improvements, and carefully managed to maintain risks at the lowest acceptable level.

A) STRUCTURED REVISION AND GATEKEEPING

I. A thorough fit-for-risk review is made prior to implementation of modifications to equipment, processes, procedures, and organization.

II. Agile project teams are set up to follow a gatekeeping approach for complex modifications and for cross functional major projects.

B) CHANGES, ADAPTATION AND FLEXIBILITY

I. Technology is continually assessed for adoption to reflect or anticipate changes in operational needs, and external context such as regulations and global energy industry trends.

II. Sustainability is achieved through innovation and investment in clean technologies. A continuous commitment is made to minimizing environmental impact through proactive measures for waste reduction, emissions control, and energy efficiency.

EMERGENCY PREPAREDNESS

A constant state of emergency and environmental response readiness is maintained.

A) EMERGENCY RESPONSE PLANS

Plans are in place to minimize adverse effects on people, environment, assets, and reputation.

I. Most credible emergency scenarios are identified, and regularly exercised.

II. Strategic and tactical response is designed to timely respond to the scenarios, including training programs for emergency teams.

III. Procedures and instructions are defined to manage operations during emergency and environmental response conditions.

B) EMERGENCY RESPONSE DRILLS AND TEST

I.Emergency drills are regularly executed and include both internal resources and local and regional emergency services.

II. Fire detection and firefighting systems, equipment and devices are regularly tested in accordance with manufacturers recommendations and designed parameters, preserving asset integrity.

REPORTING AND CONTINUOUS IMPROVEMENT

A) INTERNAL REVIEWS, ASSESSMENT, AND REPORTING

I. Regular System verifications and reviews are made to ensure effectiveness, and alignment with SSHE Policy and AIMS System requirements.

II. Safety, environmental, health, and operational performance are regularly measured and monitored:

> a. Incidents, high potential near misses and non conformances are carefully investigated to identify root causes and to prevent recurrence.
> b.Cyber threats are timely responded to and reported.

III. Our AIMS Steering Committee defines strategies, priorities, and takes action-based decisions on how to improve the System also on a long run.

B) CONTINUOUS IMPROVEMENT

I. A culture of continuous improvement is encouraged, leveraging lessons learned from operations, incidents, and industry best practices.

II. AIMS processes are updated and modified in response to internal performance data, external industry developments, technologies, and stakeholder feedback.

> a. Adoption of the best available proven technology is evaluated to capture potential improvements and efficiencies.

C) EXTERNAL REPORTING AND ENGAGEMENT

Regular reports are made to stakeholders, including employees, contractors, shareholders, and regulatory bodies.

I. Open lines of communication are maintained and nurtured with all stakeholders, providing transparent and timely information on SSHE and integrity matters.

II. We actively engage with local communities and stakeholders to address concerns and contribute to local sustainability goals.

Commitments EndNote

By integrating these Commitments into our operations and SSHE management system, our Organization will not only adhere to Owner's expectations, our Vision, and Mission, but also ensure it is a world-class within the context of our own unique operational situation, scale, and culture. This approach establishes a comprehensive, robust framework that not only ensures SSHE and operational integrity but also fosters a culture of continuous improvement, innovation, and responsibility towards employees, environmental protection, and stakeholder value including the wider community.

MEASUREMENTS

Verification of AIMS effectiveness is by a systematic measurement process. Measurement integrates technology from process workflows would produce data analytics and key performance indicators. Leveraging IT in the measurement process ensures that the Organization continuously evolves to meet the highest standards of operational integrity, safety, and efficiency.

The central enterprise database is used in conjunction with our modern IT system to continuously generate real-time role-selectable tailored dashboard, that enables Superintendents and AIMS Steering Committee to analyse the health and efficiency of AIMS processes. The outputs include useful ratios and trends so that meaningful analysis of SSHE and operations integrity can be made – leading to excellence through objective data driven decisions.

AIMS KEY ENABLERS

Identifying foundational supports is key to underpin the System's efficacy and to ensure the continuous effectiveness of the AIMS in a relatively small, yet critical, organization setting.

CULTURAL INTEGRITY

A prevailing shared belief is maintained regarding the importance of caring for the people, the environment, and operational excellence across the Organization. This includes a commitment from all personnel to uphold the Organization's values and Mission.

ADAPTIVE LEARNING

The ongoing capacity of the Organization to adopt sustained learnings from both internal and external events, trends, and advancements. This involves not just the adoption of new practices and technologies but also the modification of existing procedures based on new insights.

EMPLOYEE EMPOWERMENT

Every opportunity is taken for empowering employees at all levels to take initiative in safety, innovation, and operational improvements. This involves open communication channels and mechanisms for employees to contribute ideas and feedback.

TECHNOLOGY INTEGRATION

Seamlessly integrating technology into all aspects of operations to enhance efficiency, safety, reporting and decision-making. This includes the proactive adoption of IT and operational technologies.

STRATEGIC PARTNERSHIPS

The continuous building and maintaining of strategic partnerships with critical contractors, technology providers, industry groups, and regulatory bodies to leverage external expertise and stay ahead of industry standards and regulatory requirements.

SUSTAINABILITY FOCUS

Ensuring all operations and innovations are evaluated through the lens of sustainability to protect the environment and support the Organization's long-term viability.

APPENDIX

The following are *illustrative examples* of Key Performance Indicators (KPIs) and IT-enabled systems that are utilised:

1. RISK MANAGEMENT: transparency on residual high consequence risks and risks increases.
• **IT Tool**: risk assessment and analysis conducted, temporary risk increase, number and criticality of pending risk assessment actions, outstanding critical actions.

2. PEOPLE:
visualize collective and individual competency gaps to effectively manage operations. Trend on behaviours and people health monitoring.
• **IT Tool**: leadership visit to the field, completion of SSHE and operations integrity related training programs, competency assessment gaps, organizational vacancies, employee retention rates, employee participation in training sessions, awareness campaigns, trends of field observations outcome (unsafe behaviours), reported SSHE hazards, medical surveillance trends, ratio of temporary and permanent un-fit for work employee, sick days.

3. OPERATIONS EXCELLENCE:
indicators on how operations is run on a daily basis, including the care for the environment.
• **IT Tool**: SIMOPS exceptions, trends on permits to work quality through spot checks findings, JSA updates, air emissions levels ratio, quality of water discharges, waste reduction, energy consumption, foam monitoring trends, critical equipment spare parts availability, demand on safety systems.

4. FACILITIES AND ASSET INTEGRITY:
SSHE Critical equipment failures, maintenance execution compliance and completion.
• **IT Tool**: Predictive maintenance software that uses IoT sensors to monitor equipment condition and predict failures before they occur, real time SSHE and regulatory critical equipment health, rate of SSHE and regulatory critical equipment failure and downtime, loss pf primary containment according to significance.

5. CONTRACTORS INTEGRATION AND PARTNERSHIP: contractors SSHE performances prior and during contract life-cycle, number of interface meetings, time lost due to injuries.
• **IT Tool**: percentage of oversighted field activities, total recordable incidents rate related to hours worked for Adriatic LNG services provided.

6. MANAGEMENT OF CHANGE:
• **IT Tool**: status of changes endorsement and approval through automated workflows, open and extended and outstanding temporary changes, SSHER driven changes in progress according to ageing.

7. EMERGENCY PREPAREDNESS:
response times, emergency teams completion, quality of security barriers.
• **IT Tool**: minutes taken for musters, emergency teams completion including training, outstanding improvements from emergency drills, security and cybersecurity penetration tests outcome.

8A. REPORTING:
• **IT Tool**: trend on number of incidents and high potential near-misses (security and cybersecurity detected threads are included), time lost due to injuries, environmental spills, unplanned flaring, non conformances against AIMS requirements (including all processes and procedures) and indeed regulatory requirements.

8B. CONTINUOUS IMPROVEMENTS:
• **IT Tool**: ratios expressing implementation of new technologies and software to enhance effectiveness and efficiency of AIMS processes.

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