

Health and safety improvement proposal

Code: **IT.09610**

Version: **1**



The data pertaining to the approval of this document are available on the Regulations Document Manager



Contents

	Page
1. Purpose	3
2. Scope	3
3. Reference documents	3
4. Definitions	3
5. Responsibilities	3
6. Development	5
6.1. Flowchart	5
6.2. Record	6
6.3. Validation	6
6.4. Implementation and closure	7
6.5. Learning	7
7. Records and data. Applicable formats	7
Annex 01: Revision log	8
Annex 02: Illustrative examples of PMSs	9



1. Purpose

This document describes the management process of the health and safety improvement proposals (PMS), in its different stages of launching, analysis, validation and monitoring, which aims to be a tool for continuous improvement of health and safety.

After meeting the terms defined in this document, the PMS can be considered in the positive metrics of CCs' health and safety performance evaluation.

2. Scope

It is applicable at all companies in which Naturgy holds a majority shareholding and at those companies or entities in which Naturgy has operational and/or management responsibility.

3. Reference documents

NG.00002 Integrated Management System Global Policy

PG.00002 Manual of the Integrated Management System

NG.00008 Global supplier policy.

PG.00013 Purchasing.

NT.00047.GN Assessment of performance of collaborating companies in health and safety issues.

4. Definitions

Health and Safety Improvement Proposal (PMS): initiative or improvement action that arises from an active commitment to the health and safety of a person or an organisation and that, a priori, increases the level of protection of workers. This action, not previously implemented by any organisation, is sufficiently relevant to undergo a process of analysis, assessment and implementation, and may be considered positively for the evaluation of the health and safety performance of the collaborating companies.

Proponent: Any person, either from Naturgy or from any of the collaborating companies with an active contract, who detects an action that involves a potential improvement in the health and safety of people and decides to submit it to a process of analysis of its feasibility for implementation.

Responsible Unit: Organisational unit of each Business or country, responsible for the scope or process of applicability of the PMS presented.

5. Responsibilities

All Management Divisions of Naturgy must ensure that the general principles of this instruction are applied, and it is their obligation to verify implementation of the same.

The functions and responsibilities derived from this instruction are detailed below:



- **Proponent**

- Perform PMSs that meet the characteristics that define it as such in this instruction.
- Register the PMS in the corporate application established for this purpose.
- Provide the necessary information for its assessment.

- **Prevention unit**

- Analyse the relevance, pertinence and viability of the PMS with a view to its implementation.
- Validate, together with the unit manager, whether the PMS can form part of the positive metrics of the Health and Safety performance evaluation of the collaborating companies.
- Draw up, together with the Unit Manager and publish the good practice derived from a PMS, where appropriate.

- **Unit Manager**

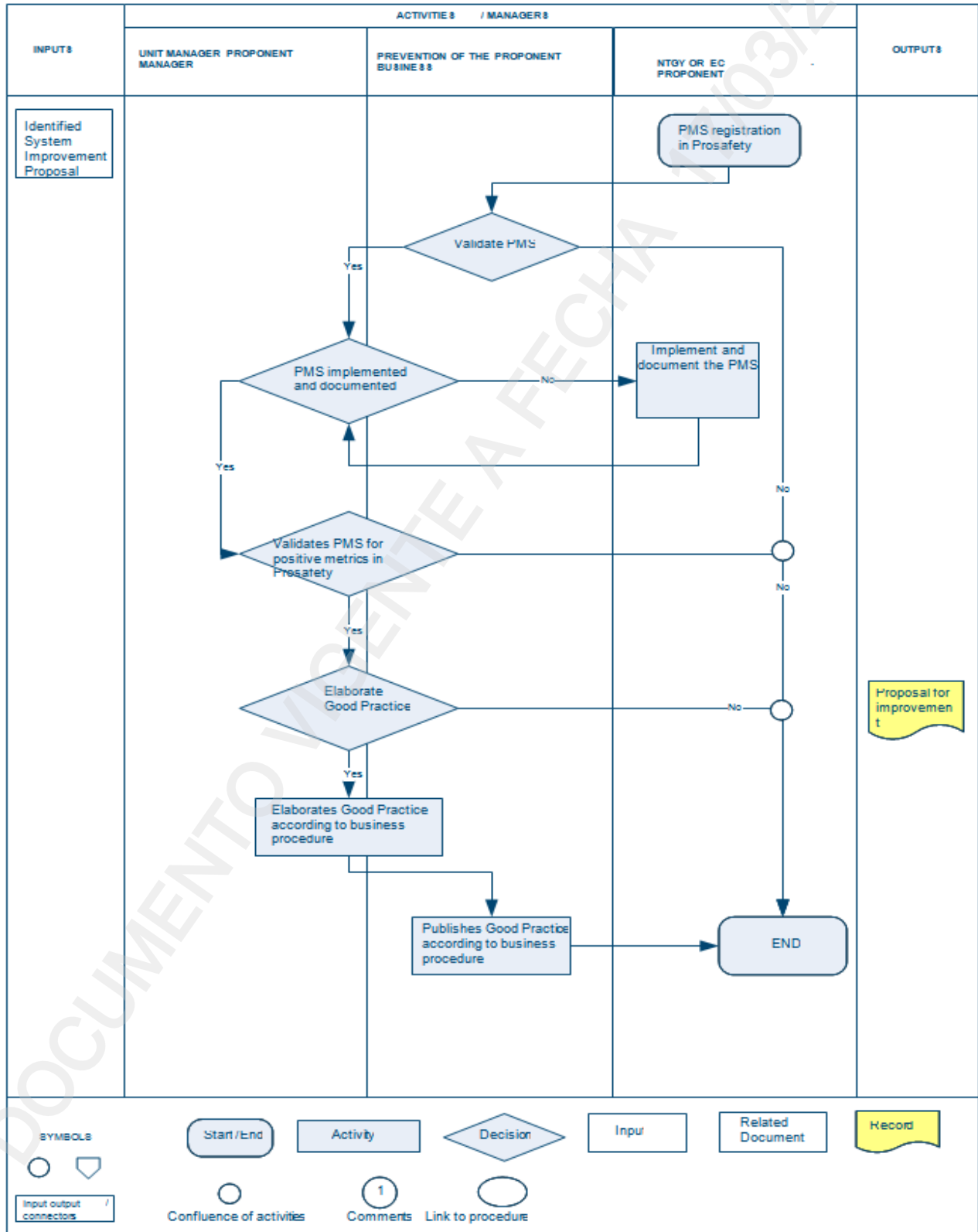
- Confirm that the improvement has been effectively implemented and documented.
- Validate, together with the Prevention Unit, whether the PMS can form part of the positive metrics of the evaluation of the Health and Safety performance of the collaborating companies.
- Draw up, together with the Prevention Unit, the good practice derived from a PMS, where appropriate.

DOCUMENTO VIGENTE A FINES DEL 17/03/2025



6. Development

6.1. Flowchart





6.2. Record

The proponent shall register the PMS in the corporate application established for this purpose, identifying the main risk factor that the proposal is intended to reduce, and clearly stating the arguments that demonstrate the expected safety improvement. In the event that the proponent is a Collaborating Company, the improvement must apply to the type of services covered by the contract in force that it has with Naturgy, although its scope of application may be broader.

6.3. Validation

The PMS submitted must be validated by the Prevention unit, which will determine whether it complies with the principles of preventive action, with the procedures established in the company and with current prevention legislation.

The following considerations will be taken into account for the validation of a PMS:

- The PMS must be properly presented, substantiated and documented.
- In general, the proposals will be simple and easy to implement and disseminate.
- They must be innovative proposals in the field of service or business units or facilities.
- It must provide high value-added for the security of the service or business processes.
- Effectiveness in solving a problem related to the service or business must be evidenced.
- In no case will a PMS that gives response to compliance with a legal requirement, including training, be validated.

According to the foregoing criteria, the Prevention unit will assess whether the PMS effectively has the potential for improvement of health and safety argued by the proponent, requesting, if necessary, further information to have all the necessary data for consideration.

The conditions for its implementation in a given area will be assessed jointly by the Prevention unit and the person in charge of the unit, taking advice from the units that they consider necessary.

The decision will be recorded in the application, and notified to the proponent, detailing the reasons in case of rejection.

To illustrate the application of these criteria on PMSs, a non-exhaustive list of examples of what may be considered as a valid PMS, as well as others that will not be admitted as such, is included in Annex 02.



6.4. Implementation and closure

The implementation of the measure must be objectively demonstrated by the proponent to the unit manager and the Prevention unit, who will assess whether it complies with the provisions and proceed to close the proposal in the application.

In the case of the PMS carried out by collaborating companies, the unit manager and the Prevention unit will determine and identify in the record whether this action is valid to be counted positively in the health and safety performance evaluation process of collaborating companies (NT.00047.GN).

6.5. Learning

When the unit manager and the prevention unit consider that the PMS can be applied more broadly, a good practice will be drawn up for its dissemination.

7. Records and data. Applicable formats

Record	Person responsible for issue	Archive medium/location	Form	File manager	Preservation time
Proposal for improvement	Proponent	Prosafety	Digital		



Annex 01: Revision log

Version	Date	Reasons for this version and/or summary of changes
1	23/02/2021	New draft. Development of a new positive safety metrics tool. Approved by the Collaborating Companies Competence Centre and validated by the H&S Operating Committee.



Annex 02: Illustrative examples of PMSs

YES they are PMSs	NO they are not PMS
New improvements in the safety conditions of facilities and the most frequent risks related to accidents (RD485, RD486, RD614.) E.g.: lighting, delimitation, signalling, interlocking systems, etc.	Implementation of the regulations of prevailing legislation in the design and construction of the facilities. Repairs of defective or deteriorated equipment or facilities.
New improvements in operations or processes of the activity (laying, lifting, civil works, load movements, felling and pruning, etc.).	Use of technological systems, machinery, tools, utensils or similar, present in the usual market and of easy and frequent acquisition by sector companies.
Innovative improvements in the use of means of transport related to road safety (warning systems, emergency signalling, fatigue detection, distractions, stability control, innovative campaigns, etc.).	Safety systems included in the means of transport, which are well established in the sector (geolocation, ABS, EDS, lighting detection, standard warning systems, cameras , etc.).
Novel improvements in the use of PPE or CPE, which even though they exist in the market are not known, or which are driven by start-up research.	Acquisition and use of PPE or CPE existing in the market of frequent use and proven consolidation.
Innovative improvements in the ergonomics of work, both office and field work activities (reduction of overexertion, falls, injuries, etc.).	Use of the usual systems, machinery, tools or equipment on the market, whose advances and improvements in the safety of their design and use are already known.
New improvements in the control of occupational safety by means of technological or didactic-training advances driven by new initiatives in the sectors related to work activity.	Training and awareness techniques existing in the markets of training companies (regulated theoretical and classroom training to meet legal requirements, training in methods based on improved leadership skills, coaching etc, mindfulness, training for the acquisition of technical knowledge necessary for performance of the activity etc.).
Introduction of initiatives related to digitalisation of the control and monitoring of safety at work (mobile apps, new software, etc.).	Implementation of preventive measures in response to health emergencies in the health of workers (COVID-19, medical examinations or occupational health checks).
Providing workers with equipment or utensils that exist on the market, but are not usual in their activity, and which represent a health and safety improvement.	All those PMSs devised and implemented previously tested by other CCs in the sector.
Innovative improvements in the control of environmental conditions in the worker's environment.	Existing and common systems on the market for weather control, comfort assurance in workplaces, etc.
Innovative improvements included in the implementation of workshops or sessions for the promotion of health and safety of workers or processes.	Development of training and safety awareness days with regular content to improve process safety.



DOCUMENTO VIGENTE A FECHA 17/03/2025