

Preventive Safety Observation Programme (PSO)

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Preventive Safety Observation Programme (PSO)

1. Purpose

The purpose of this document is to show the minimum requirements on which the Preventive Safety Observation (PSO) Programmes must be based.

This programme endeavours to increase the level of awareness about unsafe behaviours and foster the adoption of safe behaviours on the job by identifying and observing said behaviours and effective communication of the results of such observation to all employees.

To achieve greater awareness of these behaviours, the scope of responsibility of the PSO is broadened to also carry them out jointly, thereby promoting effective communication of what is observed between Naturgy and its partner companies (hereinafter, PCs). This action helps to transmit leadership of the Naturgy Health and Safety Commitment Project to Partner Companies.

2. Scope

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

The Partner Companies with which Naturgy must make Joint Preventive Safety Observations with its counterparts (hereinafter JPSO) will be agreed upon mutually by the person from Naturgy charged with carrying out the JPSO and his or her counterpart in the Partner Company, or vice versa.

3. Reference documents

NG.00002 Manual of the integrated management system

4. Definitions

PSO: Preventive Safety Observation

JPSO: Joint Preventive Safety Observation with counterpart in the Partner Company

IMS: Integrated Management System

5. Responsibilities

Indicated throughout the document.

6. Development

6.1. General aspects

Behaviour modification programmes are a fundamental tool in the field of safety, because there is evidence that a significant proportion of work accidents are caused by unsafe behaviours (actions).

One fundamental aspect of the programme is that observations are made of behaviours and not of people, meaning that the result of the observation is the recording of whether the observed behaviour is safe or unsafe, but the person or group observed is not identified.



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Unless otherwise stated, as a general concept, references to an observation or PSO encompasses both the PSO and JPSO, and references to the Preventive Safety Observation Programme also apply to JPSOs.

6.2. Characteristics of the programme

The main characteristics of the programme are the following:

- Proactive focus.
- Worker participation.
- Observable behaviours
- Positive consequences.
- Gradual consolidation.
- Anonymous observations (the JPSO is also anonymous, as the worker is not identified)
- First class preventive tool.

6.3. Programme Design

6.3.1. Areas of activity

All company workers and those of its partner companies that perform jobs within the entire scope of Naturgy including operational tasks, office and driving tasks are subject to observation.

Although not exclusively, priority will be given to PSO on the group's most operational activities, and those which are most critical to the group's risks.

6.3.2. Observers

At least all executives, middle managers and all other workers who have personnel in their charge or who supervise contracted activities will be observers.

In the case of the JPSOs, Partner Company observers are the counterparts of the Naturgy executives and middle managers.

In addition, and with prior agreement, any person from a Partner Company with staff supervisory responsibilities may make a JPSO with his or her counterpart at Naturgy.

Each leader may make and document a PSO or JPSO when, in the course of their usual activity, they detect the occasion to make an observation because of the opportunity for dialogue with people, regardless of whether the identified behaviour merits praise or needs correction.



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6.3.3. Programme of observations to be made (PSO and JPSO)

During the first two months of the year, the Health & Safety Management Committee of each Business will approve the program of PSO/JPSO objectives to be carried out by its group, taking into account the following minimum criteria.

- **Leaders with operational personnel in their charge or under their supervision:**
 - General Manager: one observation every six months.
 - Manager: one observation every quarter.
(At least one JPSO/year).
 - Other personnel: one observation every two months.
(At least one JPSO/year).
- **Leaders with cross-company functions without risk operations.**
 - To be determined by the Business Unit

Individuals with an annual target of one PSO may decide which type of PSO to carry out, although a JPSO is recommended whenever possible.

This obligation is incumbent upon the people in each Naturgy business who manage a commercial contract or who have direct responsibility with the Partner Companies that carry out activities in their area.

Individuals from Naturgy who do not manage a commercial contract or who do not deal directly with the partner companies are not obliged to conduct the JPSOs.



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6.4. Observation Process

The observation process has the following phases:

Initial:

This phase can be planned or spontaneous. In case of planned observations, the observer must contact the personnel responsible for the activity in order to carry out the visit or request the pertinent permissions if necessary. In spontaneous observations, the observer will follow the criterion of opportunity.

Observation:

The “Inventory of Safe Behaviours” reflected in the IT tool provided for this purpose will be used as a reference guide. When unsafe behaviours are noted in an observation, the observer must inform the person or group executing the task.

If the detected situation involves serious or imminent hazards, this indication will be made at the time it is detected. The situation will be corrected immediately and will be appropriately reported. In these cases, other tools such as T0, work stoppage, etc. may be used. (For example: access to a confined space without an explosimeter, jobs in a ditch without adequate protection when there is a hazard of being buried...).

Record of the PSO:

The task observed will be marked in the document called “PSO Form” available in the computer application for PSO management, thereby indicating the task that is being performed and whether it is being performed by a contractor. If it is a JPSO, this must be expressly marked, identifying the person making the observation in Naturgy and the counterpart in the Partner Company.

This information will be uploaded in the application for PSO management.

A quick guide containing instructions on how to record the PSO correctly in accordance with this NT.00032 will be added to the corporate tool for recording the PSO.

6.5. Processing and dissemination of the results

The Business Health and Safety Management Committee will regularly monitor the level of compliance with the OPS programme and the evolution of its main monitoring indicators.

The relevant aspects and lessons learned from the analysis of the observed behaviours will be disseminated throughout the organisation through the usual communication channels (committees, safety meetings, lessons learned, etc.)

6.6. Support material

When making the observation, the observer must use the protective equipment specifically required for the activity which is to be observed or for the environment where it is to be conducted.

In case of site visits, repair / maintenance jobs or visits to technical installations, the minimum personal protective equipment consists of safety footwear, a hard hat and



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high-visibility vest. Home visits, see Residential Operations, Servigas, Servielectric, etc., i.e. jobs carried out in domestic customers' homes, are not considered technical installations.

Materials will be requested for according to the system established in each country.

6.7. Training of participants

Naturgy observers will undergo a training course to become qualified as such.

6.8. PSO/ JPSO Form

The observations will be recorded in the Preventive Safety Observation Form available to all Naturgy businesses in the PSO/ JPSO management application .

6.9. Rules for conducting the PSO

A safety dialogue will be initiated, in which workers will be asked questions and positive aspects will be emphasised.

Even if no unsafe behaviours are detected in the PSO, the dialogue with users must be recorded. It is recommended that this section always be filled out to include the positive aspects detected in the observation.

If any unsafe behaviour is detected, the type of obstacle and the appropriate comments and suggestions must be entered in the corresponding section of the questionnaire. The observer must record the dialogue that takes place, specifying commitments made if any unsafe behaviour is identified, as well as record the response from the person observed.

Initially, the form should not be used during the observation. It is advisable to fill in the form afterwards.

7. Logs and data. Applicable formats

Not applicable.



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8. List of annexes

Annex 00 Review log

1	10/04/2013	Newly drafted document.
2	25/07/2013	Description in sections 6.3.1, 6.3.2, 6.3.3 and 6.7 improved to facilitate understanding of the responsibilities and scope.
3	05/05/2016	Change of format of annexes and elimination of NT.00032 Preventive Safety Observation Form, which still appeared in the document.
4	31/01/2017	Change of the frequency with which PSOs are to be made by leaders with cross-company functions. Elimination of Annex 2: Inventory of Safe Behaviours
5	01/12/2017	Performance of JPSO by Partner Companies and Naturgy. Elimination of Annex 1
6	11/11/2021	Points 6.3.3 and 6.3.4 of the previous version are integrated and simplified. The figure of the “PSO programme coordinator” is removed. The mandatory monthly monitoring report (previous 6.5) and the reference to monitoring indicators (previous 6.9) have been removed. Assignment and follow-up of PSO objectives is transferred to the Safety Committee of the Business Units. Form adaptation and adaptation to organisational changes. Approved by the Standardisation Competence Centre and validated by the H&S Operating Committee.