

## Zero Tolerance for deviations (Tolerance 0) and proactive work safety stoppages

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## Contents

	Page
1. Purpose	4
1. Scope	4
2. Reference documents	4
3. Definitions	4
4. Responsibilities	5
5. Development	5
5.1. General aspects	5
5.2. Zero Tolerance Phases and Work Stoppage	5
5.3. Indicators	6
5.4. Tool tracking	6
6. Records and data. Applicable formats	6
7. List of Appendices	6
Appendix 00: Revision log	7
Appendix 01: Proactive Work Stoppage Criteria	8



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## 1. Purpose

The purpose of this document is to reflect the minimum requirements of the “Zero Tolerance” and “Work Stoppages” tool, designed to facilitate the notification of deviations regarding safety and hazard conditions and promote the correction thereof, without being considered penalising in nature.

## 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.

Included within this scope are all stoppages of own personnel or CC, which occur in:

- Facilities, sites and work centres of Naturgy.
- Facilities owned or shared with a third party, when Naturgy is responsible for the works or for the operation and maintenance of the facility.

## 3. Reference documents

NG.00002. Manual for the Integrated Management System for Quality, Environment, Safety and Health.

NT.00048: Health and Safety Standard: Management of learning and experience.

NT.00047. Health and Safety Standard: Performance management.

## 4. Definitions

**Leader:** All executives and middle managers who have personnel under their care or who supervise contracted activities.

**Manager of the activity:** The direct leader who is responsible for the activity or the work centre where the deviation is observed, who will be designated by each unit/business.

**Deviation:** A breach of the safety rules or any other situation that, while not being stated as a rule, could represent an unsafe act or unsafe condition.

**Unsafe act or behaviour:** This is any activity that, due to an act or omission by a worker, involves the violation of a procedure, rule, regulation or established safe practice and that could cause an accident, incident or occupational disease.

**Unsafe Condition:** It is any foreseeable physical or environmental situation or characteristic that deviates from that which is acceptable, normal or correct, which could therefore cause an accident, incident or occupational disease. In most cases, it is the result of Unsafe Acts.

**Work stoppage:** Proactive stoppage of the activity of a work in progress as a result of the observation of unsafe acts or conditions that may endanger the safety and health of people, the environment or facilities.



## 5. Responsibilities

- All personnel of Naturgy are responsible for detecting, stopping, resolving and reporting deviations as part of their commitment to safety.

## 6. Development

### 6.1. General aspects

This tool is based on the premise that any unsafe act or condition, however small it may seem, involves a certain probability that an accident may occur.

Therefore, it is not acceptable that a professional might detect a deviation and not do everything in their power to correct it.

This tool attempts to explain and reinforce the commitment to safety through prevention, hereby explicitly stating the personal commitment of everyone, especially leaders, to detect and immediately correct, without exception, any deviation from safety rules and expectations.

The objective of both tools is based on demonstrating that, in our presence, unsafe behaviours and conditions are not tolerated and that, if any are detected, we get involved in resolving them.

To demonstrate this commitment, it must be recorded in the systems, which does not mean that follow-up on the same is delegated.

Therefore, both the detection of an incident and the actions taken to eradicate the risk situation must be recorded.

If, among said actions, the intervention of other managers or units is necessary, the pertinent communications or requests will be made through the methods or systems already established.

### 6.2. Zero Tolerance Phases and Work Stoppage

The process has the following phases:

- Systematically and frequently detecting deviations throughout the course of daily activities.
- Immediately acting on the deviation, even stopping work, if applicable, until the unsafe act or condition is corrected.
- Report in either the "Deviation notification form" or the "Stoppage notification form" as appropriate, using the Prosafety application.

This communication will describe the safety deviations that have been identified (0 tolerance) or, where appropriate, the causes that have led to the stoppage of work, as well as the actions taken to correct them.



- Once the deviation has been solved, the person responsible for opening it up in the system will close the notification.

### 6.3. Indicators

The follow-up indicator of implementation of the Zero Tolerance tool will be quarterly and will be performed by each unit, under the following terms:

- No. of zero tolerances reported with respect to the total No. of Leaders. While there is no predetermined target for compliance in the use of this tool, it will be maintained to the extent that it is an input to the tool defined in NT.00048 Learning and Experience Management.
- In the case of work stoppages, the monitoring of the implementation of the tool will be carried out on a monthly basis, while at the same time monitoring the actions to be implemented and evaluating their effectiveness.

### 6.4. Tool tracking

The results of the Zero Tolerance tool will be followed up by the unit/facility with the procedure defined by the Knowledge and Experience Management Network NT.00048.

In this way, the lessons learned (lessons learned, good practices or security contacts) can be extracted and the records generated can be put to good use.

Regarding “Work stoppages”, those considered as positive metrics will be monitored based on the parameters established in NT.00047. Performance Management.

For the purposes of positive metrics stoppage will be considered those related to detected safety deficiencies/deviations which, due to their nature, are not managed or analysed under any other standard, procedure or technical instruction. This ensures that any safety stoppage must be managed and analysed to prevent future incidents or accidents from occurring. (See Appendix 01).

## 7. Records and data. Applicable formats

Notification of the deviation or incident will be given using the “Prosafety” IT tool.

## 8. List of Appendices

- Appendix 00: Revision log
- Appendix 01: Proactive Work Stoppage Criteria



#### Appendix 00: Revision log

Version	Date	Reasons for this version and/or summary of changes
1	31/10/2013	Newly drafted document.
2	31/03/2015	<p>The notification process will be carried out through the prosafety application. Section 6.3 and Appendix 3 are eliminated, in addition to the obligation to do 1 per quarter by the leaders.</p> <p>The monitoring indicator is modified insofar as no objective is determined but it is pointed out that they are an "input" for the generation of learning according to NT.00048 Management of learning and experiences.</p>
3	05/05/2016	Change to header of the Appendixes.
4	23/02/2021	<p>Inclusion of new tool "proactive work safety stoppage".</p> <p>Format adaptation. Approved by the Collaborating Companies Competence Centre and validated by the H&amp;S Operating Committee.</p>



## Appendix 01: Proactive Work Stoppage Criteria

**The following will not be considered for the purpose of positive metric stoppages: those that are carried out as a result of non-compliance with internal procedures, rules and instructions, regulatory requirements, etc. such as:**

- Work stoppages, or documented deficiencies, as well as deviations detected and corrected as a result of the activity carried out by the safety coordinators.
- Unforeseen events related to road safety that do not put the driver, passengers or third parties at risk or that do not lead to a loss of driving control. Breakdowns, punctures or damage to tyres, alarms in the vehicle's sensors, projections onto the front windscreen that have no consequences, etc.
- Those occurring in the movements of the collaborating companies before the provision of the assigned service at Naturgy's facilities.
- Those in which strict compliance with the procedure would have avoided the need to generate a stoppage, in the face of an anomalous situation. (Example, during the performance of a discharge, check for the absence of voltage and detect that it exists).
- Lack or misuse of protective equipment.
- Deficiencies found in the planning of the work prior to approval of the work (planning discharges, etc.).
- Deficiencies found during the control prior to the start of work, etc.

**The following would be considered positive metric stoppages:**

The stoppages generated during performance of the activity, which is executed according to the established procedure and making a correct use of tools, machinery, and the established protection equipment due to conditions not previously planned:

- Untimely or unforeseen energisations (due to human error, return voltage, failure of equipment isolating voltage sources, voltage injection from undeclared sources, lightning strikes, inductions, etc.).
- Errors in the performance of work or lack of coordination that have caused real situations of risk for people (for example, poor identification of cables, deficient earthing of the work area, etc.).
- Equipment anomalies detected during the performance of work that may pose a real risk to the safety of people (false signals of the status of switching elements, false signals of voltage presence detectors, interlocking failures, etc.).
- Detection of wear and tear or breakage of personal protective equipment as a result of regular use.
- Fires. Including those with atmospheric emissions, but where the administration fails to activate the alarms in the population.
- Presence of uncontrolled toxic gases.
- Breakdowns in company vehicles that occur while driving and that can put people at risk at that moment.