

Health and Safety Standard: Safety Thresholds

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1. Purpose

This document describes the “Safety Thresholds” (ST), designed to determine behaviours that are considered to be intolerable in the area of health and safety in the activities promoted by Naturgy.

2. Scope

It is applicable to all companies of the Naturgy group and to those in which it has responsibility for its operation and/or management, both in work carried out by its own personnel and by collaborating companies and subcontractors.

In all cases, the national legislation applicable in each territorial area and the aspects covered by this Health and Safety Standard shall be complied with.

3. Reference documents

- **Naturgy Code of Ethics**
- **NT.00035** Process for reporting, investigation and follow-up of accidents and incidents.
- **NT.00045** Penalties regime applicable to collaborating companies.

4. Definitions

Safety Thresholds (ST): Unsafe behaviours, as indicated in section 6 and annex 01 of the standard, concern both undesirable safety management behaviours and activities that can cause serious harm to people and/or installations, and therefore cannot be tolerated. The conscious and deliberate practice of such behaviours by employees will lead to the application of the internal sanctioning regime, which may result in the termination of the contract. For collaborating companies, this will entail a proposed sanction and restriction on the offending individual(s) from working with Naturgy. This can lead to the final termination of the contract for serious or very serious breaches of safety measures.

5. Responsibilities

Business Units.

- Ensure that both own staff and those of Collaborating Companies are aware of the safety thresholds applicable to their activities and the consequences of non-compliance.
- Prioritise the implementation of controls within activity supervision tools aimed at ensuring compliance with the duty of vigilance, particularly in operational activities with the highest risk criticality where Operational Safety Thresholds have been defined.



- Stop work if necessary, classifying and recording any potential safety thresholds identified.
- Communicate the imposed sanctions to the collaborating company.
- Evaluate the allegations received from the collaborating company and determine whether a definitive sanction is warranted and its extent.

Collaborating Companies

- Ensure that all operational managers and workers assigned to Naturgy activities are aware of the applicable safety thresholds and the consequences of non-compliance associated with them.

Own Employees and Employees of Collaborating Companies

- It shall be the responsibility of any employee of Naturgy or any of its Collaborating Companies not to cross the safety thresholds.

6. Description of Safety Thresholds

Naturgy's Management considers that safety is a condition of employment and also a condition of contracting for its collaborating companies. For this reason, and to avoid certain unsafe behaviours that affect both undesired safety management behaviours and activities that may cause serious harm to people, a series of safety thresholds (ST) have been defined that must not be crossed.

6.1. Definition of Safety Thresholds (ST):

6.1.1 Management Safety Thresholds

- **Concealing work accidents or very serious incidents:** concealing any type of accident or very serious incident—or inducing third parties to do so—caused during the execution of activities on behalf of the company, either by its own personnel or by any external collaborator providing services.
- **Falsifying safety records:** Falsifying records and/or information relating to the safety of people and facilities in activities related to the company.
- **Ordering non-compliance with safety regulations:** Ordering non-compliance with a safety regulation in the execution of the company's own work or that of contractors, which may cause damage to people and/or installations.

6.1.2 Operational Safety Thresholds

- **Operational Safety Thresholds** associated with the most critical risk activities are considered to be those which, based on the information compiled in the accident rate analysis, supervision and inspection activities, etc., are defined at any given time, and which are listed in **Annex 01**.



6.2. Non-compliance with any Safety Threshold (ST)

Any employee shall report a breach of any of the established Safety Thresholds.

Following an investigation of an accident or incident, where it is shown that any of the Safety Thresholds have been breached, this must be reported by the person responsible for the investigation.

The notification of a breach by own personnel, as well as the management and outcome of actions resulting from the breach, shall be made in accordance with the provisions of Naturgy's Code of Ethics, and as indicated in the notification and consultation process available on Naturalnet. In the case of Collaborating Companies, the provisions of NT.00045, "Sanctioning Regime Applicable to Collaborating Companies", shall be followed.

Failure to comply with the Safety Thresholds may result in the termination of the employment contract or the contract for the provision of services in the case of Collaborating Companies.

7. Records and data. Applicable formats

Not applicable

8. List of annexes

Annex 00 Review log

Annex 01 Operational safety thresholds



Annex 00 Review log

Version	Date	Reasons for this version and/or summary of changes
1	04/03/2014	Initial version
2	05/05/2016	Updating of unit names.
3	05/09/2023	<p>Form adaptation and adaptation to organisational changes. Extension of the scope to Collaborating Companies. Inclusion of the category of operational safety thresholds and inclusion of their list in the annex.</p> <p>Approved by the Standardisation Competence Centre and validated by the H&S Operating Committee.</p>



Annex 01. Operational Safety Thresholds

These thresholds are defined to increase control over the highest risk factors and activities, where there is a higher incidence of significant accidents. Their ultimate aim is to enhance operational discipline and ensure strict compliance with work procedures in these activities, as well as the use of necessary personal protective equipment.

For each of these risk factors/activities, safety thresholds have been defined, which include the most recurrent deviations identified in the investigation and inspection processes.

Confined Spaces	<p>Carrying out work without express authorisation for access (work permit and/or work order) and prior control.</p> <p>Failure to carry out prior and continuous measurement of hazardous atmospheres, failure to act on all elements that may hinder favourable natural ventilation, and failure to use forced ventilation in the event of hazardous atmospheres or when such atmospheres are likely to be generated during the work.</p> <p>Absence of the safety supervisor and/or the necessary equipment and materials for the performance of their duties.</p>
Working at Heights	<p>Not using a fall arrest system consisting of a harness, connecting element, and anchorage point when working at height.</p> <p>Performing vertical work without using two ropes (one for work positioning and one for safety), anchored to different anchorage points. Not using a fall arrest system when working on roofs with a risk of falling from height.</p> <p>Carrying out work on supports or electrical installations without having checked their condition or having revised the assessment already made during the planning stage of the work.</p>
Felling and Pruning Trees	<p>Remaining within the tree fall danger zone while felling is being carried out.</p> <p>Encroaching the Minimum Working Distance (MWD) from the point of view of electrical risk with the installation in service or without using Live Working Techniques.</p> <p>Failure to use cut protection equipment by the chainsaw operator and/or fall protection systems by personnel accessing the tree at height.</p>
Electrical Risk	<p>Carrying out work (live or off-load) on MV installations in operation without authorisation from the operating centre or control room (authorising entity).</p> <p>When preparing for de-energised work on MV, not verifying the absence of voltage or not placing earthing devices in the work area during the installation discharge manoeuvres.</p> <p>Failure to verify the absence of voltage and failure to use insulated tools and required PPE for carrying out low voltage work.</p>
Handling of Loads (with mechanical means)	<p>Standing under a suspended load or within the action radius of the lifting equipment and/or using lifting equipment with obvious signs of deterioration or lack of safety devices.</p> <p>Transporting, handling, or stowing a load without ensuring it is positioned and secured to guarantee its stability.</p> <p>Handling loads without ensuring the stability of the lifting equipment (e.g., use of stabilisers and support plates), performing abrupt manoeuvres, or using equipment outside the limits established in the manufacturer's load diagram.</p>
Road Safety	<p>Using mobile phones and/or mobile applications without approved hands-free devices while driving.</p> <p>Not wearing seat belts on all vehicle seats.</p> <p>Driving without a driving licence or with a revoked driving licence and/or without a valid technical inspection of the vehicle.</p>