HSE Requirements

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Abbreviations

Abbreviation	Definition
ALARP	As Low As Reasonable Practicable
BP	Business Process
SAQ	Supplier Assessment Questionnaire
FAC	First Aid Case
MTC	Medical Treatment case
O&M	Operation & Maintenance Phase
HSE	Health Safety Environment
HSO	Health and safety Officer
H&S	Health and Safety
HIPO	High Potential Incident
HIRA	Hazard Identification and Risk Assessment
NM	Near Miss
RWC	Restricted Workday Case
LSR	Life Saving Rules
LFE	learning from experience
LTI	Lost Time Injury
DRA	Design risk assessment
CDM	Construction Design Management
JSA	Job Safety Assessment
UXO	Unexploded Ordnance
PPE	Personal Protective Equipment
SOOB	Scope of Operational Boundary
SIMOPS	Simultaneous Operations
TRIR	Total Recordable Injury Rate
LTIF	Lost Time Injury Frequency
O&M	Operations & Maintenance
PTW	Permit To Work

1. Introduction

The aim of this document is to communicate the minimum Health & Safety requirements to contractors and sub-contractors in the application of health and safety standards on GLODENI ENERGY S.R.L. sites.

This document is intended to promote the health and safety of Contractors and their employees by establishing minimum standards and applying good practices to avoid danger from hazards during Contract work on the GLODENI ENERGY S.R.L.'s Sites or premises. This document must be read in conjunction with the annexes (list clause 2.1 of this document), which are divided after the completion of the site design and before the start of the work.

2. List of Associated Documents and Regulations

Below is a list of related documents which should be read in relation to HSE Contractor's requirements as well as the European directives our contractors are expected to comply with.

2.1. List of documents that should be developed and approved at least 4 weeks before the start of construction work:

Document ID	Document name	Responsible for document development	Date of document approval
Annex 1	HSE risk register template BESS Glodeni	GLODENI ENERGY S.R.L. - template Contractor - upgrade/clarification GLODENI ENERGY S.R.L. - approval Contractor - approval	at least 4 weeks before the start of work on the site
Annex 2	HSE plan BESS Glodeni	GLODENI ENERGY S.R.L. - template Contractor - upgrade/clarification GLODENI ENERGY S.R.L. - approval Contractor - approval	at least 4 weeks before the start of work on the site
Annex 3	HSE Supplement/ERP template BESS Glodeni	GLODENI ENERGY S.R.L. - template Contractor - upgrade/clarification GLODENI ENERGY S.R.L. - approval Contractor - approval	at least 4 weeks before the start of work on the site
Annex 4	HSE Performance Reporting & Monitoring template BESS Glodeni	GLODENI ENERGY S.R.L. - template Contractor - upgrade/clarification GLODENI ENERGY S.R.L. - approval Contractor - approval	at least 4 weeks before the start of work on the site

2.2. European codes and standards including industry best practices:

Below codes and standards were used to compile this health and safety requirement document. These codes and standards are the minimum standards that are expected from GLODENI ENERGY S.R.L. contractors to comply with.

EU Directive 89/391/EEC	Council Directive on the introduction of measures to encourage improvements in the safety and health of workers at work (89/391/EEC)
Regulation 2023/1230/EU - machinery	REGULATION (EU) 2023/1230 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 June 2023 on machinery and repealing Directive 2006/42/EC of the European Parliament and of the Council and Council Directive 73/361/EEC
ISO 9001	Quality Management

ISO 14001	Environmental management
ISO 27001	Information security
ISO 45001	Occupational Health and Safety Management - replaced OHSAS 18001
ISO 55001	Asset management
NEN-EN-ISO 31000	Risk Management
NEN-EN-ISO 31010	Risk assessment techniques
NEN-EN-ISO 90003	Software engineering

Contractors should check applicable regulations in each EU member state. National regulations may include additional details and requirements.

3. HSE related definitions

Below are definitions of terms used throughout this H&S Regulation. When in doubt, speak to your manager or the HSE Manager.

Principal Contractor:

Contractors appointed by GLODENI ENERGY S.R.L. to coordinate the construction, operation, and maintenance phases of a project where it involves more than one contractor, generally also responsible to manage H&S on site.

Principal Designer:

Designers appointed by GLODENI ENERGY S.R.L. in projects involving more than one contractor. They can be an organization or an individual with sufficient knowledge, experience, and ability to carry out the role.

Designers:

Assigned contractor/organizations or individuals who as part of a business, prepare or modify designs for a product or system relating to construction work.

Workers:

Those working for or under the control of contractors on a construction site.

Contractor:

Those who carry out the actual construction work, means the Contractor, Consultant, Agent, or Service Provider as defined in the Contract.

Contract:

Means the Contract, or Agreement.

Shall:

Will or must, making a duty or task mandatory.

Site:

Means the site of the onshore battery storage, or GLODENI ENERGY S.R.L. premises/offices.

Authorization or Permit:

Meaning permit-to-work, is a documented procedure that authorizes certain people to carry out specific work within a specific time frame.

Fatality:

An incident that involves death because of a work-related incident or occupational illness. Deaths that occur after an incident but are a direct consequence of an incident are to be included.

Asset damage:

An event where there is damage to plant, equipment, or facilities (no injury to persons).

Near miss:

Near miss is any incident which could have resulted in a work-related accident but did not, either by chance or timely intervention.

First aid:

An incident which requires simple treatment that is self-administered or by a first aider, doctor or nurse but does not result in lost time or long-term medical care.

Medical treatment:

An incident not severe enough to be reported as a fatality, lost workday incident or restricted workday incident, but which is more severe than requiring simple first aid treatment.

Restricted workday:

An incident that does not result in a fatality or a lost workday but does result in a person being unfit for the full performance of the regular job on any work on any day after the occurrence of the occupational injury.

Lost workday:

Non-fatal incident that involves a person being unfit to perform any work on any day after the occurrence of the occupational injury. 'Any day' includes rest days, weekend days, leave days, public holidays, or days after ceasing employment.

High potential incident:

High potential incidents are incidents or near misses that had the potential to cause a fatality/ lifechanging injury.

Risk Assessments and method statements:

Also called HIRA's (Hazard Identification and Risks Assessments) and are used to assess possible and obvious hazards on the work site as well as their associated risks. This assessment will lead to mitigation measures appropriate to those hazards and method statements will explain how the works / tasks will be executed safely taking these identified hazards and risks in account.

Dropped object:

An uncontrolled object being dropped, i.e., a drop due to technical failure, equipment/tool drops, or fallen objects (formed ice on structures).

LTIF:

The number of Lost Time Injuries (LTI) per 200,000 hours worked.

4. Understanding H&S obligations

All Contractors shall ensure that its workers, those of its sub-contractors and any other agent acting on behalf of the Contractor comply with all applicable aspects of health and safety and legislation, and GLODENI ENERGY S.R.L.'s Health & Safety Mission, Principles and Life Saving Rules. Compliance with the provisions of these documents shall not relieve the Contractor of any of its responsibilities under the Contract, nor of any obligation imposed upon it by any local law, legislation, or regulation.

5. GLODENI ENERGY S.R.L. Health & Safety Mission, Life Saving Rules

All contractors shall comply with GLODENI ENERGY S.R.L.s' Health & Safety Mission, Principles and Life Saving Rules (LSR) in all stages of the project (Development, Construction, O&M).

6. Specific requirements for the development and construction phase

This section describes the minimum H&S requirements during the development and construction phase.

6.1. Specific requirements for Principal designer

The assigned principal designer shall be responsible for the planning, managing, monitoring, and coordination of health and safety in the pre-construction phase of the project. This shall include:

- Identifying, eliminating, or controlling foreseeable risks.
- Prepare and provide relevant information to other contractors.
- Liaise with GLODENI ENERGY S.R.L. and/or the principal contractor to help in the planning, management, monitoring and coordination of the construction phase.

6.1.1. Design Risk Assessment

Contractors who will carry out the work should be involved in the design process and design risk assessment (DRA), helping to ensure that risks are eliminated or minimized by design. This shall be arranged by the principal designers.

In the DRA, statements about residual risks, such as 'contractor to address in construction phase' should be avoided where possible, unless there is no better option in the design and that the contractor will be able to reduce the risk to ALARP.

6.1.2. Certification

The assigned principal designer shall demonstrate compliance to ISO 9001 and be able to handover a valid certificate.

6.2. Specific requirements for Principal contractors

The assigned Principal contractor shall coordinate the relevant phase for example construction, operation and

maintenance phases associated Health & Safety. The main responsibility of the principal contractor will be to Plan, Manage, Monitor, and Coordinate health and safety on applicable project sites. This includes:

Conduct a Risk Assessment and develop accompanying method statements where applicable at least 4 weeks before the start of construction.

Ensure all Risk Assessed mitigation measures are in place before the start of construction.

Preparing all project deliverables (HSE Plan, ERP and Traffic Management plan) in English and the Romanian language and submit these to GLODENI ENERGY S.R.L. at least 5 weeks before starting operation for review.

Preparing a site-specific Project HSE Plan.

Preparing and ensuring a suitably sufficient site-specific Emergency Response Plan is in place.

Preparing and ensuring a suitable site-specific Traffic Management Plan is in place for on-site and on public roads where the project operates (check where roads are to be blocked and overhead lines needs moving, ensure load bearing capacity of roads are not exceeded and that roads are wide enough in all areas for loads to pass and liaise with local authorities to ensure planning is suitable and communicated).

Liaising with GLODENI ENERGY S.R.L. and principal designer on a regular basis, but at least on a weekly HSE meeting.

Organizing cooperation between contractors and coordinating their work via regular HSE meetings (including pre-shift meetings, toolbox talks, safety standdowns, etc.), SIMOPS planning, properly coordinated PTW and safe systems of work.

Ensure proper dust control on site via speed limits and water spraying (have sufficient means to control dust properly Re: enough water bowsers / enough water capacity and regular water spray on roads during all working hours).

Ensure public roads at site entrances and exits are kept free from mud via whatever means needed for example water high pressure washers and brooms as well as cleaning tires before vehicles are allowed on public roads (ensure means to wash mud of truck, car and other equipment tires before Driving onto the public road).

Ensuring excavation works are suitably protected from collapse by using false works and props, ensuring barriers are placed along the edges and that suitable means of escape are provided for those working inside the excavations with ladders placed at correct heights and spaced no more than 3 meters apart, and after completion of work proper compacting to be done.

Ensuring trenches are protected by barriers to prevent people falling or Driving into them.

Ensuring all construction machinery have certified records of conformity and are regularly inspected and maintained as well as only operated by qualified and certified personnel.

Establish smoking and non-smoking areas and emergency assembly points.

Establish dedicated parking spaces with reverse parking as a rule.

Having suitable full time dedicated HSE representation on site during works to monitor and support activities.

Ensuring incident management in the form of incident reporting, incident investigation and putting in place preventative measure to prevent recurrence of the same or similar incidents.

Providing monthly site safety statistics (KPI's).

Do daily HSE site walks.

Provide a weekly site safety inspection report.

Conduct a monthly health and safety meeting on site between all contractors HSE representatives and site managers.

Conduct at least 1 internal HSE audit during construction phase and provide a report to GLODENI ENERGY S.R.L. and ensure all observations and non-conformities of such an audit is closed out in a timely manner.

In addition, the principal contractor shall make sure that:

Suitable site inductions are provided.

Reasonable steps are taken to prevent unauthorized access to work sites.

All hazardous work like excavation / trenching, false works, piling, lifting operations (via crane ops or with mechanical lifting aids), road construction, civil work and site establishment are done safely and coordinated properly via PTW and supervision.

Workers are consulted and engaged in securing their health and safety.

Workers are protected against wildlife, like bear attacks and dog bites.

Workers are protected against harsh environmental conditions (Heat and cold).

Welfare facilities are provided.

More details regarding above requirements can be found further down in this document.

6.2.1. Certification

The assigned principal contractor shall demonstrate compliance to ISO 9001 and be able to handover a valid certificate.

6.2.2. Health and Safety Accountable Person

The Principal Contractor shall nominate a senior person to be accountable for meeting all contractual and statutory obligations for the health and safety of its own and sub-contractor's workers and other persons affected by the Contract work.

6.2.3. Health and Safety Officer

The Principal Contractor will provide a full-time dedicated health and safety officer that will be on-site during all works until final completion and hand-over.

This health and safety officer will be responsible for the day-to-day safety management of the Principal contractors activities. His duties should include the following:

- Ensure the Principal contractor's HSE plan is properly implemented.
- Ensure all mitigation measure from the Risk Assessment is adhered to.
- Ensure work is done in a safe manner in compliance to safe work instructions, best practices, and common sense.
- Ensure PTW system is in place and properly utilized and managed.
- Develop job hazard analysis in conjunction with the persons performing the work and ensuring all associated hazards and mitigation measures are considered during the execution of works.
- Conduct regular / daily worksite inspections ensuring good housekeeping, doing hazard checks, ensuring workers are adhering to PPE rules, conducting checks on equipment and tools, and ensuring workers are working according to agreed safety standards.
- KPI record keeping (as discussed in more detail below).
- Prepare and submit inspection reports (as discussed in more detail below).
- Perform a formal site inspection or audit to identify and correct any non-compliances noted.
- Provide written record of inspections, audits, and status of action follow-ups.
- Serve as an intermediary between the contractors, project manager, client, workers and subcontractors to ensure that all parties have a clear understanding of their safety obligations.
- Management of project Health and Safety files in a single location.
- Prepare and submit handover documents.
- Conduct accident and incident investigations where needed with the support of site management.
- Facilitate / conduct emergency GLODENI ENERGY S.R.L.s.
- Conduct safety familiarizations / site safety inductions.
- Facilitate / conduct toolbox talks
- Contractors shall submit the CV of the HSO or supervisors to GLODENI ENERGY S.R.L. when requested.

6.2.4. Project Health & Safety Plan

A project specific Health and Safety Plan shall be developed by Principal contractor as a common statement and key reference for all parties to the project. It is the principal contractor's responsibility to prepare the Plan. This plan will be presented to GLODENI ENERGY S.R.L. for review and no work will start before the plan has been accepted as suitable. This plan will be developed in both English and the local language.

The plan should include:

- The organizational arrangements, identifying the Contractor's staff to be primarily responsible, for the management of health and safety on site,
- The contractor's arrangements for ensuring the competence of employees and subcontractors,
- Arrangements for the site induction training,
- Arrangements for the assessment of risks to health and safety and copies of relevant assessments to be added to the project site folders during the project execution.
- Details of preventative measures for the control of all reasonably foreseeable hazards and hazardous activities that may be encountered during the works. The hazards will include those highlighted by GLODENI ENERGY S.R.L. in the specification together with those that may arise due to the contractor's activities on site.
- Details of general health and safety rules to be observed by employees and subcontractors,
- Arrangements for communicating with employees and other contractors on matters affecting their health and

safety,

- First aid, welfare, and emergency arrangements,
- Arrangements for monitoring compliance with health and safety requirements,
- Incident reporting
- Emergency Response arrangements

6.2.5. Project Emergency Response Plan

A project specific emergency response plan needs to be developed and submitted to GLODENI ENERGY S.R.L. for review and acceptance by the principal contractor at least 4 weeks before the start of operations. This plan will be presented to GLODENI ENERGY S.R.L. for review and no work will start before the plan has been accepted as suitable. This plan will be developed in both English and the Romania language.

This plan should include the following:

- The organizational arrangements, identifying the Contractor's staff to be primarily responsible, for the management of emergencies.
- Arrangements for requesting assistance, reporting and alerting authorities.
- The contractor's arrangements for ensuring the competence of employees and subcontractors for handling of emergencies.
- Arrangements for the emergency preparedness like GLODENI ENERGY S.R.L.lls and training conducted as well as emergency equipment needed and available.
- Arrangements for alerting staff and visitors of an emergency and accounting for everyone after Implementing an emergency protocol.
- Arrangements for emergency evacuation.
- Arrangements for providing first aid and medical assistance.
- Arrangements for testing and updating the Emergency Response Plan.
- Examples of all credible scenarios and the planned measures to handle these as well as associated equipment used to assist in emergency response.

6.2.6. Project Traffic Management Plan

A project specific traffic management plan needs to be developed and submitted to GLODENI ENERGY S.R.L. for review and acceptance by the principal contractor at least 4 weeks before the start of operations. This plan will be presented to GLODENI ENERGY S.R.L. for review and no work will start before the plan has been accepted as suitable. This plan will be developed in both English and the Romania language.

This plan should include the following:

- Keeping pedestrians and vehicles apart.
- Controlling vehicle operations during construction work.
- Indicate entrances and exits.
- Indicate pedestrian walkways and crossings.
- How visibility of vehicles and pedestrians will be ensured.
- What obstructions there are for both vehicles and pedestrians.
- What type and location of barriers on roadways and walkways.
- What steps are taken to minimize vehicle movements, for example, to limit the number of vehicles on site, provide car and van parking for the workforce and visitors away from the work area, control entry to the work area and plan storage areas so that delivery vehicles do not have to cross the site.
- How access of people on site will be controlled.
- How it will be ensured that all workers are fit and competent to operate the vehicles, machines and attachments they use on site by, for example, checks when recruiting GLODENI ENERGY

S.R.L.vers/operators or hiring contractors, training GLODENI ENERGY S.R.L.vers and operators and managing the activities of visiting GLODENI ENERGY S.R.L.vers.

- How access to vehicles will be managed and people alerted to the risk.
- How the need for vehicles to reverse will be avoided where possible as reversing is a major cause of fatal accidents.
- How one-way systems can be introduced to reduce the risk, especially in storage areas.
- How limited visibility will be managed.
- If vehicles reverse in areas where pedestrians cannot be excluded the risk is elevated and visibility becomes a vital consideration. You should consider:
- Aids for GLODENI ENERGY S.R.L.vers - mirrors, CCTV cameras or reversing alarms that can help GLODENI ENERGY S.R.L.vers can see movement all-round the vehicle.
- Plant and vehicle marshallers - who can be appointed to control maneuvers and who are trained in the task.
- Lighting - so that GLODENI ENERGY S.R.L.vers and pedestrians on shared routes can see each other easily. Lighting may be needed after sunset or in bad weather.
- Clothing - pedestrians on site should wear high-visibility clothing.
- How signs and instructions will be implemented.
- How it will be ensured that allGLODENI ENERGY S.R.L.vers and pedestrians know and understand the routes and traffic rules on site.
- Transport routes indicating load bearing capacities of roads, bridges, height and width restrictions and other limitations considering the size, shape and weight of loads.
- What arrangements have been made with local authorities for transporting abnormal loads on public / national roads.

6.3. H&S Requirements for all contractors

All contractors working on behalf of GLODENI ENERGY S.R.L. shall comply with the following HSE specific requirements.

6.3.1. Risk Assessment and Method Statement

Contractors shall prepare and submit a written risk assessment, in accordance with European directives and the appropriate legislation, specific to the operations to be carried out on site. Please note that risk assessments must be done for all activities, those that have a significant risk must have a written risk assessment.

Where a significant risk is identified, the Contractor shall provide both a risk assessment and a method statement for the work activity. The Contractor shall be able to demonstrate that the risk assessment and method statement has been communicated to the employees and sub-contractors under its control. All risk assessments and method statements must be submitted to GLODENI ENERGY S.R.L. and assigned Contractor for HSE management 4 weeks prior to the commencement of the work.

6.3.2. First Aid Needs Assessment

Contractors will conduct a project / site specific first aid needs assessment to provide guidance in the requirements for first aid personnel and provisions at the workplace. Employers are legally required for first aid, firefighting and the evacuation of workers, to designate the workers required in implementing such measures, to keep a record of the required number of first aiders and to ensure the required first aid provisions are in place.

During the first aid risk assessment the employer needs to consider the hazards and risks that may occur in the workplace and provide actions to mitigate those risks. At minimum, the first aid risk assessment needs to consider:

- The size of the organization (e.g., number of persons on site simultaneously).
- The location of the site.
- The response time for emergency services to that site.
- The type of work carried out at the workplace.
- Vulnerable groups (e.g., young workers, pregnant women, visitors, people with special needs etc.).

- Hazards and risks at the workplace.
- Working at a remote site.
- Whether workers work alone or in teams.
- The requirements for travel.
- If other parties are working at that site.
- Previous incidents.
- The potential for injuries at the workplace.
- The necessary level of first aid provisions needed at the employer's workplace.
- Sufficient redundancy to always ensure adequate coverage by first aiders.

6.3.3. First Aiders

All employers need to provide enough first aiders. Dedicated first aiders need to be easily identifiable / recognizable during work hours. During all activities there need to be enough first aiders to cover the criteria mentioned in 6.3.2.

If the outcome of the first aid risk assessment indicate that the risks are high within the organization, the employer needs to adjust the number of first aiders accordingly.

There needs to be an accurate and actual list of all first aid contacts on the site and be always maintained. Factors that need to be considered when identifying the necessary number of trained personnel and the required levels of training are:

- Identified hazards and risks.
- Location of site.
- Expected response time of professional emergency services.
- Holiday coverage.
- Wounded first aiders/emergency responders (in case of workers with additional FA/ER role).

6.3.4. First Aid Provisions

Workplaces must have first aid provisions in clearly identifiable and accessible boxes. First aid materials should be checked and maintained regularly (e.g., checked for deterioration of equipment, expiry dates, completeness etc.).

A maintenance document for the first aid materials needs to be in place. This maintenance document shall include, but not be limited to:

an overview of the present first aid materials, the person in charge of the maintenance, and a maintenance plan. Material and provisions required are based on the findings of the first aid risk assessment. In addition, the following should be considered:

- Defibrillators.
- Basic first aid kit (national requirements vary as to what should be contained in first aid kits, normally depending upon the type of risks faced and the size of the population that it covers).
- First aid travel kit.
- Area suitable for treatment.
- Extended first aid equipment suitable to facilitate a rescue.
- Additional provisions such as survival kits (considering environmental conditions).

6.3.5. First Aid Provisions

All contractors have the responsibility of carrying out a risk assessment and informing personnel of the risks and dangers they may face carrying out their work. Additionally, the Contractor must ensure that the First Aiders are sufficiently trained by recognized training institutes and will hold valid and recognized certificates before the work commences.

The training must be suitable to provide necessary first aid after an accident/incident at the workplace. It is

considered good practice to provide the personnel with industry-specific training if available. Contractors with personnel that work in different countries should consider that certificates accepted by the authorities of one country are not always accepted by the authorities in another country. When deploying (temporary) personnel to another country, employers are advised to consult with local authorities regarding the acceptability of training certificates.

Task specific risk assessment could lead to additional requirements. For specific activities in and around the BESS, additional training may be required (e.g., for working with hazardous energies like hydraulics and electrical high and low voltage, working with chemicals, treatment of hypothermia and after harness suspension).

For personnel working on electrical installations, additional training for the treatment of electric shocks and burns is necessary. First aid training must address, as a minimum, the following topics:

- Basic life support and resuscitation2 (CPR and mouth to mouth resuscitation in accordance with the guidelines of the ERC).
- Unconsciousness
- Shock
- Fractures
- Burns
- Control of bleeding, wound dressing
- Choking
- First aid for minor injuries
- Common illnesses, seizures, eye injuries and heart attacks.

6.3.6. Contractor Health, Safety and Environmental Plan

All Contractors shall declare that they have read and understood the of GLODENI ENERGY S.R.L.'s

HSE plan and policies. All Contractors shall align their HSE policies and HSE plans with GLODENI

ENERGY S.R.L.'s HSE plan and policies.

All Contractors (e.g., BoP contractors or assigned contractors in the construction or O&M phase) shall prepare and submit a specific H&S (project specific) plan to GLODENI ENERGY S.R.L.. The health and safety plan shall be submitted to the GLODENI ENERGY S.R.L.'s HSE Manager at least 4 weeks prior to commencement of work on site.

The plan should include:

- The organizational arrangements, identifying the Contractor's staff to be primarily responsible, for the management of health and safety on site,
- The Contractor's arrangements for ensuring the competence of employees and subcontractors,
- Arrangements for the site induction training,
- Arrangements for the assessment of risks to health and safety and copies of relevant assessments to be added to the project site folders during the project execution.
- Details of preventative measures for the control of all reasonably foreseeable hazards and hazardous activities that may be encountered during the works. The hazards will include those highlighted by GLODENI ENERGY S.R.L. in the specification together with those that may arise due to the contractor's activities on site. The control measures shall meet the standards laid down in subsequent sections of this document,
- Details of general health and safety rules to be observed by employees and subcontractors,
- Arrangements for communicating with employees and other contractors on matters affecting their health and safety,
- First aid, welfare and emergency arrangements,
- Arrangements for monitoring compliance with health and safety requirements,
- Incident reporting
- Emergency Response arrangements

GLODENI ENERGY S.R.L. is entitled to monitor the Contractor and Subcontractors, to ensure compliance with the provisions of HSE Plan. Deviations, identified during the inspection, shall be recorded in a report signed by both Parties and specific measures implemented to ensure immediate compliance.

6.3.7. Risk based approach – Main Hazard Topics

Contractors shall take a risk-based approach in the development of their H&S Plan and associated risk assessment on the construction sites and shall focus as a minimum to these hazardous topics as listed in this chapter.

The following list of topics under which hazards. They include hazards that may be created, or affected, by Contractor activities, and those to which contractors may be exposed. Some are hazards, others are factors that may increase the risks or make controlling them more difficult.

They are listed alphabetically – no order of significance is implied:

- Awareness, training, and competence.
- Cable and pipeline strikes, other buried services, and unexploded ordnance.
- Driving and travel to work (may be extensive in remote areas, adding to working day).
- Electricity.
- Excavations.
- Ground loads and bearing strength (e.g., to support cranes and other plant).
- Ground slippage/peat movement.
- Hand working / Manual handling.
- Hazardous substances (contaminated land, existing structures, construction, and maintenance materials etc.).
- Hazards to and from the farm under construction.
- Language and cultural differences.
- Lifting operations and lifting equipment.
- Mobile elevating work platforms (MEWPs).
- Moving plant, machinery, and vehicles
- On site and for workforce and deliveries using public roads.
- Noise and vibration.
- Overhead lines.
- Poor quality risk assessments/ method statements (RA/MS).
- Power and water supplies.
- Public/third party access, authorized or unauthorized (e.g., vandalism).
- Scaffolding.
- Slips, trips, and falls.
- Telecommunications breakdown.
- Temporary works.
- Weather.
- Working at height.
- Working in remote/inhospitable areas (e.g., in terms of emergency service access and response time, difficult terrain, inclement weather, travel time adding to fatigue).

7. Generic HSE requirements for all phases (development, construction, and O&M)

This section describes the minimum H&S requirements during the development and construction phase.

7.1. System certificate

The Contractor shall demonstrate compliance to ISO 9001 (Quality), ISO 14001 (Environmental) and ISO 45001 (Occupational Safety) and be able to handover a valid certificate.

7.2. Environmental management

Environmental impacts associated with the construction, operation, and decommissioning of storage may include, among others, impacts on the physical environment (such as noise or visual impact) and biodiversity (affecting birds and bats, for instance).

These environmental implications shall be identified in a project specific environmental aspect and impact register, developed and maintained by the principal contractor, supported with the applicable environmental conditions for the construction area. These conditions are mainly associated to noise monitoring, dust control, environmental monitoring (e.g., waste, pollution, water), and biodiversity monitoring.

It is imperative that all contractors involved strictly adhere to the waste management guidelines as agreed upon in the project in the HSE plan. By following these guidelines, GLODENI ENERGY S.R.L. can demonstrate compliance to environmental regulations and collectively minimize the environmental impact of the project.

All contractors shall comply with the local environmental regulations and shall particularly take ownership in the following areas:

7.2.1. Prohibition of Incineration/burning Waste:

Incineration or burning of waste at our sites is strictly forbidden. Burning waste releases harmful pollutants into the air and can have detrimental effects on the environment and human health. As responsible contractors, it is the duty to find alternative and compliant methods for waste disposal, such as recycling, as specified in the HSE plan.

Burning waste is prohibited

7.2.2. Segregation & collection of different types of waste

Effective waste segregation plays a crucial role in ensuring proper waste management. All contractors shall prioritize waste segregation at the construction site and provide the necessary arrangements to make this possible. The Contractor must have contracts signed with authorized operators for the delivery of waste.

Waste segregation is mandatory at GLODENI

ENERGY S.R.L. sites In addition, each (construction) site must be

equipped with:

Containers for the collection of household waste, by category: paper, metal, plastic, glass, textiles, and non-recoverable.

Containers for the collection of construction waste: oil filters, air filters, used spare parts, used protective materials (gloves, coveralls), paint tubes, and metal.

7.2.3. Prevention of dust emissions

Dust emissions resulting from high traffic speeds on dirt or unpaved roads pose a significant concern. Speed limitation of 15 km per hour must be strictly always adhered to while Driving on dirt/unpaved roads within the project site. This measure is crucial to minimize dust generation and prevent its dispersion into the surrounding areas, ensuring the well-being of both the workforce and the local community.

Other than speed limits water spraying measures shall be done as well and there should be sufficient capacity to ensure this can be done all day long as to ensure there are never any times that the dirt road surfaces dry out and dust are caused again.

Dust to be prevented at construction sites, by speed limits 15 km/h.

7.2.4. Mud prevention at the public roads

To prevent mud at the public roads, a rigorous vehicle cleaning process shall be implemented at the access sites, including the proper disposal of the resulting wastewater.

7.3. Competence

Contractors shall be able to demonstrate that the workers acting on behalf of Contractor are competent to perform their work safely (e.g., electrical work, working at height). This shall be done preferably by a recognized industry standard such as GWO.

7.4. Language

Language of the site shall be the local language of the country where the storage is situated, unless otherwise agreed. The Contractor shall ensure that all workers are able to understand the instructions given in the local language.

Management and health and safety officer will be bilingual, meaning able to speak the local language as well as English at a working level.

7.5. Sub-contracting

The Contractor shall be able to demonstrate that he has applied selection procedures that ensure that his sub-contractors are demonstrably competent to perform the works safely. The Contractor shall provide to the project manager the names of sub-contractors proposed to perform work on Site a minimum of 2 weeks prior to such sub-contractor attending Site. The Contractor retains responsibility for the health, safety plan, the risk assessments and method statements produced by its sub-contractors.

7.6. Site induction

All employees, visitors, vendors, Contractors, attending any Site shall have successfully completed a Site-specific health and safety induction training before commencing work on site. Provision of such training will be by responsible Contractor or GLODENI ENERGY S.R.L.. Delivery GLODENI ENERGY S.R.L.vers and visitors' induction may be limited to emergency arrangements, PPE requirements, Site rules/hazards etc. Site inductions must be refreshed at regular intervals and when hazards change significantly.

The topics covered should include, but not be limited to, the following:

- Senior management commitment to safety; GLODENI ENERGY S.R.L. H&S Mission statement.
- Outline of the project.
- Management of the project.
- First aid.
- Accident and incident reporting.
- Emergency arrangements (e.g., contacts, plans and equipment).
- Communications
- Arrangements for briefing and updating personnel, e.g., toolbox talks.
- Arrangements for consulting the workforce; – individual's responsibilities.
- Site rules (e.g., GLODENI ENERGY S.R.L.'s LSRs, personal protective equipment (PPE), use of personal phones, permits to work, fire
  prevention, traffic management, hot works, restricted areas...).
- Any risks and control measures that those working on the project need to know about.

GLODENI ENERGY S.R.L. is entitled to prohibit access to the part of the Site where Contractor carries out its Works to any person, including its personnel who does not, or will not, comply with the HSE plan.

GLODENI ENERGY S.R.L. does not impose specific restriction about Contractor's Personnel working hours and days provided (i) that such hours and days comply with the HSE Plan and with relevant labour Laws applicable to the Contractor's Personnel, including Laws relating to their health, safety, welfare and (ii) that Contractor allow Contractor's Personnel all their legal rights.

7.7. Stop work authority

As per Life saving rule, any representative of the GLODENI ENERGY S.R.L. or the Contractor will have the authority to stop work if, in their opinion, it is necessary in the interests of health and safety.

7.8. Lone working

Lone working should be avoided unless it is not reasonably practicable to avoid lone working. This shall be subject to risk assessment and agreement.

7.9. Incident reporting

- Fatalities
- Lost Time Injuries (LTI)
- Restricted Work Cases (RWC)
- Medical Treatment Cases (MTC)
- First Aid Cases (FRC)
- Near Miss reports
- High potential incidents
- Dropped Objects
- Environmental spills
- Asset damage
- The data shall specify in which phase the incident happened:
- Development site - development and consenting phase of the project
- Construction site - construction and commissioning
- Operational site - site in operation producing power

The data shall specify the location of the incident:

BESS car park; civil works; office/office surroundings; road and tracks; BESS assembly, deliveries, foundation internal; transmission, and distribution system, or public space.

Event associated with employee or service provider, or member of public associated with site activities or assets	Immediate notification by telephone	Written notification within 24 hours	Detailed root Cause investigation within 7 days	Include in monthly overview
Fatality (FAT) Cases that involve one or more people who died because of a work-related incident. 'Delayed' deaths that occur after the incident are to be included if the deaths were a direct result of the incident. For example, if a fire killed one person outright, and a second died three weeks later from lung damage caused by the fire, both shall be reported. In some cases, a delayed fatality occurs in the next calendar year after the incident. For example, if the above fire occurred on December 21, the second death from it might occur in January of the next year.	**X**	**X**	**X**	**X**
Lost Workday Case Non-fatal cases that involve a person being unfit to perform any work on any day after the occurrence of the occupational injury. 'Any day' includes rest days, weekend days, leave days, public holidays, or days after ceasing employment. These incidents are also known as a Lost time injury.	**X**	**X**	**X**	**X**
Medical treatment injury (MTC) An incident is classified as Medical Treatment (MT) when the management and care of the patient to address the injury is above and beyond First Aid. Medical Treatment does not include: . The conduct of diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes (e.g., eye drops to dilate pupils) . Visits to a physician or other licensed health care professional solely for observation or counselling . The following may not involve any treatment but for purposes of severity classification, will report as Medical Treatment: - Any loss of consciousness	**X**	**X**	**X**	**X**

Event associated with employee or service provider, or member of public associated with site activities or assets	Immediate notification by telephone	Written notification within 24 hours	Detailed root Cause investigation within 7 days	Include in monthly overview
- Significant injury diagnosed by a physician or other licensed health care professional for which no treatment is given or recommended at the time of diagnosis. Examples include punctured ear drums, broken teeth, fractured ribs or toes, byssinosis and some types of occupational cancer. - Needle stick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material - Occupational hearing loss - Medical removal under a government standard Note: First Aid carries a very specific meaning for this purpose. Please refer to the definition of First Aid.				
First aid injury (FAC) An incident is classified as a First Aid if the treatment of the resultant injury is limited to one or more of the specific treatments. These are: . Using a non-prescription medication at non-prescription strength . Administering tetanus immunizations . Cleaning, flushing or soaking wounds on the surface of the skin . Using wound coverings such as bandages, Band-AidsTM, gauze pads, etc., or using butterfly bandages or Steri-StripsTM . Using hot or cold therapy . Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. . Using temporary immobilization devices while transporting an accident victim (e.g. splints, slings, neck collars, back boards, etc.) . GLODENI ENERGY S.R.L.lling of a fingernail or toenail to relieve pressure, or draining fluid from a blister . Using eye patches . Removing foreign bodies from the eye using only irrigation or a cotton swab . Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means . Using finger guards		**X**		**X**

Event associated with employee or service provider, or member of public associated with site activities or assets	Immediate notification by telephone	Written notification within 24 hours	Detailed root Cause investigation within 7 days	Include in monthly overview
. Using massages, or . GLODENI ENERGY S.R.L.nking fluids for relief of heat stress				
Asset damage An event where there is damage to plant, equipment, or facilities (no injury to persons) *: In case of a major damage a root cause investigation is required.		**X**	**X***	**X**
High potential near miss Occurrences with potential for fatality, serious injury, major environmental impact, or major damage (e.g., falls from height, shipping/traffic collisions, contained spills, uncontrolled hoisting/lifting events, etc.)	**X**	**X**	**X**	**X**
Near miss Occurrences with potential for medical treatment injury, minor environmental impact or less.		**X**		**X**
Major environmental incident Incidents which result or will likely result in: Irreversible or large-scale damage to flora and fauna. Attention of (local) press, media, local inhabitants, or authorities. Specialist support to clean-up or remove. (e.g., uncontained open water spills, largely spread onshore spills, large damages to vegetation, animal deaths, etc.)	**X**	**X**	**X**	**X**
Minor environmental incident Incidents which result in only minor timely effects to flora and fauna which can be completely restored, cleaned-up or removed with standard available. provisions. (e.g., minor spills, contained small scale open water spills, damages to verges or trees, etc.)		**X**		**X**
Major complaints / nuisance Reported complaints by third party (neighbours) or damages to foreign property which is verified by either: . Inspection or measurement	**X**	**X**	**X**	**X**

Event associated with employee or service provider, or member of public associated with site activities or assets	Immediate notification by telephone	Written notification within 24 hours	Detailed root Cause investigation within 7 days	Include in monthly overview
. Acknowledgement by GLODENI ENERGY S.R.L. or its subservice provider . Receipt of reports/observations by two or more independent sources, and which is not solved/remedied within one working day				
Minor complaints / nuisance Reports of complaints from members of the public concerning the site activity which could not be verified by measurement or observation by GLODENI ENERGY S.R.L..		**X**		**X**
Security incidents Reports of intrusion, vandalism and theft on all sites established by, and vessels hired for, the site.	**X**	**X**		**X**

7.10. Incident investigation

Incidents will be investigated in accordance with Service providers incident investigation procedure. This means that a trained incident investigator will take the lead during the investigation period and is responsible to draft the report.

In case of incidents which caused a high effect or near misses that could have had a high effect, a root cause investigation is required. This shall be done in accordance with the TOP-SET method, or approved equivalent offered by the service provider. Additional information may be required from the worksite or in case of a serious incident a delegation may go visit the worksite to carry out an investigation on-site.

The reports are reviewed with direct involved office personnel and the more serious incidents are discussed with the GLODENI ENERGY S.R.L. management (office HSE leadership meeting). For all reports a preventative action is determined. When deemed necessary, preventative actions are distributed companywide to alert all sites of safety hazards and their mitigation measures. Actions shall be recorded and closed out via the incident overview on GLODENI ENERGY S.R.L. SharePoint.

The Contractor shall investigate High potential near miss, RWC and LTI incidents with an adequate root cause methodology such as Kelvin TopSet or equivalent.

7.11. Non-compliance with the HSE Laws and Requirements

In the event the GLODENI ENERGY S.R.L. Personnel identify a fact of non-compliance with the HSE laws and requirements on the construction site territory/facilities, which has caused or might have caused an injury, fire, accident, road accident, environmental pollution, forced equipment downtime, involved Contractor shall take appropriate steps to investigate this incident.

All parties involved from Contractor/ Subcontractor personnel shall submit to this investigation and disclose all relevant documents related to the incident (e.g., personal access badge, work permit, operations certificate and other documents certifying their authorization to perform works or professional qualification). If the incident is still ongoing, dangerous works should be stopped immediately.

The result of the investigation shall be recorded in the form of a report to be submitted to GLODENI ENERGY S.R.L. HSE Manager within 24 hours after the violation was identified.

7.12. Construction Site Managers

The assigned Construction Site Manager shall be in possession of a recognized health and safety site management qualification or at least have passed a relative health and safety site management training in the past 5 years. Site supervisors and workers must demonstrate H&S competence relevant to their roles and responsibilities. This shall be verified by the presentation of all relative accreditation documents required for the task to be performed.

7.13. Health & Safety Coordinator

If the scope of work and the level of hazards connected to the works justify this, there will be extra Health and Safety coordinators appointed. The need for these coordinators will be decided during the Risk Assessment, but common sense should be used in this regard as well and if at any time during the execution of works it becomes apparent that extra health and safety supervision is needed this must be discussed with GLODENI ENERGY S.R.L. immediately.

The Health and Safety Coordinators designated for the construction work or O&M scope must have both the health and safety knowledge as well as the appropriate technical skills to assess the works to be performed and implement the appropriate measures required.

7.14. Equipment, Tools and Machinery Inspections

Prior start of work, all equipment, tools, and machinery related to the work are inspected and fit for the work.

HSE inspections throughout the work are to be maintained and performed continuously by the Contractors. All recommendations made by the inspectors are promptly implemented without delay.

GLODENI ENERGY S.R.L. has right to conduct its own HSE inspection and/or audits at site and the Contractor shall comply with all the recommendations made.

Contractor shall ensure all fuel powered and electrical equipment (including any requirements on fuel burning equipment) meet the requirements of hazardous area classification by authorities and equipped with approved spark arrestor.

Contractor shall ensure only certified competent personnel are allowed to operate and/or maintain equipment, tools, and machinery.

7.15. Personal Protective Equipment (PPE)

As per GLODENI ENERGY S.R.L. Life Saving rules the Contractor shall enforce the use of PPE to all its personnel including the subcontractor's personnel and supply adequate PPE, user training, and maintenance of PPE at its own cost. The PPE must be suitable for the job and meet industry good practices.

For each of the Contractors' applicable worksites, the following PPE is obligatory as a minimum:

- Safety helmet EN 397
- Safety footwear, S3 approved and ankle height as a minimum (EN ISO 20345)
- High visibility vest or high visibility clothing
- For specific tasks for example cutting and grinding, working at height etc. task appropriate PPE should be used.
- Gloves suitable for the task (EN 420)
- Fall arrest harness (EN 361) including twin energy-absorbing lanyards certified according to (EN 355)
- Eye protection (EN 166)
- Ear protection as appropriate (EN 352)

7.16. Driving

GLODENI ENERGY S.R.L.vers to and from site can be more hazardous in certain regions and under adverse conditions. GLODENI ENERGY S.R.L.vers of all vehicles are to be fully licensed and experienced as well as specially trained where applicable.

It is recommended to utilize vehicle tracking systems to ensure speed limits and safe GLODENI ENERGY S.R.L.vers habits are adhered to. These systems should include ways to identify the GLODENI ENERGY S.R.L.ver at the time of recording, and should be able to record speed, kilometers traveled, hours spent GLODENI ENERGY S.R.L.vers, harsh braking / acceleration and sharp cornering as a minimum.

7.17. Meetings

The Contractor shall arrange the following HSE related meetings as a minimum:

- Daily meetings with (sub)-contractors to discuss the daily work, any conflicts and permits, these should take the form of pre-shift meetings.
- Weekly HSE meetings to identify, discuss and resolve safety issues on site.
- Weekly HSE management meetings, usually on a Thursday morning involving GLODENI ENERGY S.R.L. safety manager and relevant site safety representatives and management.
- Toolbox talks to address safety concerns as well as before the start of hazardous non-routine work.

7.18. Site Health and Safety inspections

All work sites will be inspected regarding health and safety matters at least once per week by the site management facilitated by the health and safety officer. This site management H&S inspection will be recorded and submitted to GLODENI ENERGY S.R.L. on every Friday afternoon before close of business.

Daily site walks will also be held by the health and safety officer to ensure compliance from the workforce to the safety management on site. A good indication for the work scope of the health and safety officer on site would be 80% on-site doing work observations, safety coaching and general health and safety support to site management and 20% focus on administration.

7.19. Site inspections from authorities

In case a site inspection from a (local) inspection or authority is planned, the Contractor shall inform GLODENI ENERGY S.R.L. immediately and provide all necessary means to facilitate the inspection.

7.20. Key Performance Indicators

Assigned Contractor shall submit indicator data (leading & lagging), as well as total working hours monthly. Leading indicators data is an indication how much effort has been put in the prevention of incidents. Lagging indicators provide an indication of the number of safety issues. Each Contractor only reports to their own employees and direct (sub)contractors. H&S Performance_Reporting_scheme.xlsx shall be used.

Key performance indicators are used by management to track the health and safety performance of a project and to ensure continuous development and improvement of the project's health and safety performance. These KPI's are also used in case of incident investigations to help identify weak points / faults / oversights in the safety management on site. KPI's also help to identify negative as well as positive trends that can help to achieve positive adjustment of safety management on projects. KPI's that are expected to be received from the project health and safety officer monthly are as follows:

Reporting Period: Month / Year: Contractor:	Previous Period	Reporting Period	Project Total	Targets
Manhours Worked				
Total Manhours	0	0	0	
HSE Statistics Leading Indicators				
Nº of Observations (Includes Unsafe acts/unsafe conditions & Hazards)	0	0	0	
Nº of Positive Observations (Improvement suggestions and noted good performance)	0	0	0	
No of Interventions	0	0	0	
Safety Days	0	0	0	365/ 12 months
Job Hazard Analysis issued	0	0	0	
Toolbox talks held	0	0	0	
HSE training/meetings held	0	0	0	
Emergency Response GLODENI ENERGY S.R.L.lls	0	0	0	
HSE Statistics Lagging Indicators				
Fatalities (FAT)	0	0	0	0 (zero harm)
Lost Time Injuries (LTI) (a full day or more lost)	0	0	0	0 (zero harm)
Restricted Workday Cases (RWC)	0	0	0	
Medical Treatment Cases (MTC)	0	0	0	
First Aid Injury Cases (FAC)	0	0	0	
Near Misses	0	0	0	
High Potential Near Misses	0	0	0	
Occupational Illness-Work Related Cases	0	0	0	
Property/Equipment Damage (including Fire/Explosion)	0	0	0	
Equipment Failure	0	0	0	
Security Incidents / Security Breach	0	0	0	

Dopped objects	0	0	0	
Frequency Rates				
Lost Time Injury Frequency per 200.000 man-hours (LTIF)	0	0	0	<0.05
Total Recordable Cases Frequency per 200.000 manhours (TRCF)	0	0	0	<0.30
Reportable to Authorities				
Reportable Events to Government / Enforcement Agencies	0	0	0	
Environmental Performance				
Environmental Incident – Spill (nr. /liter)	0	0	0	Less than 3 incl. oil / chemical spillage, items, and high potential observations
Environmental Incident - Other	0	0	0	
Environmental Spill Frequency (Spills not contained / 200.000 man-hours)	0	0	0	<0.70
Environmental Non-Compliance (e.g., of permit, license, consents)	0	0	0	0
HSE Management Monitoring				
(Senior) Management Safety Tours	0	0	0	
HSE Inspections	0	0	0	
HSE Audits	0	0	0	
Safety (Committee) meeting	0	0	0	
High Level Leading KPI's				
Site Kick-off & Progress Meeting	0	0	0	
Site HSE Documents submission and approval	0	0	0	
HIRA Meetings and follow-up actions	0	0	0	
Audit and follow-up actions	0	0	0	

Key indicators like Total Recordable Case Frequency and Lost Time Incident Frequency are analysed on a quarterly basis and reported throughout the company. Key performance indicators are set, reviewed, and analysed on a yearly basis by the HSE department. The same is discussed in the management review meeting.

8. Safe working practices

The following safe working practices shall be agreed during the preparation phase of the project, the Safe Working Practices shall be in accordance with industry good practices. Minimum requirements are set below:

- Working at Height
- Confined space working
- Excavation work
- Electrical work (Low, Medium, and High voltage)
- Hot Working, welding
- Lifting operations
- Use of mobile cranes
- Flammable liquids
- Use of hazardous substances
- Vehicles and mobile plant

9. Discipline policy

Discipline policies for construction sites may vary depending on the specific needs and requirements of the project and the organization. Basically, the following discipline measures are considered.

9.1. Discipline Policy for GLODENI ENERGY S.R.L. Sites

Purpose:

The purpose of this discipline policy is to maintain a safe and productive work environment at the GLODENI ENERGY S.R.L. site and to ensure that all workers adhere to the site rules and regulations.

9.2. Compliance:

All workers at the construction site are expected to comply with the following rules and regulations:

- Follow all safety protocols (GLODENI ENERGY S.R.L. Life Saving Rules), procedures, and regulations.
- Adhere to the project schedule and assigned work tasks.
- Treat all team members, contractors, and stakeholders with respect and professionalism.
- Use appropriate personal protective equipment (PPE) as required for the job.
- Respect waste & environmental management practices
- Maintain a clean and tidy workspace at the work area.

9.3. Disciplinary Actions:

Any violations or non-compliance with the rules and regulations may result in disciplinary actions, which may include but are not limited to:

- Verbal Warning: The worker will be given a verbal warning for minor or first-time violations. The supervisor or site manager will explain the nature of the violation and remind the worker of the expected behavior.
- Written Warning: If the violation persists or is more severe, the worker will receive a written warning. The written warning will be documented and kept in the worker's file. The worker will be given an opportunity to correct the behavior.

- Suspension: In cases of repeated or serious violations, a worker may be suspended from the site for a specified period. During the suspension, the worker will not be allowed to access the construction site or perform any work-related tasks.
- Termination: If a worker continues to violate the rules and regulations despite previous disciplinary actions or engages in behavior that poses a serious risk to safety or project progress, termination of employment may be considered.

9.4. Fairness:

The discipline policy will be implemented in a fair and consistent manner. Workers will be provided with an opportunity to present their side of the story and respond to any allegations. Supervisors and managers will document all incidents and disciplinary actions taken.

9.5. Communication and Training:

This discipline policy will be communicated to all workers on the construction site through orientation sessions and regular safety meetings. Workers will be made aware of the consequences of non-compliance and the importance of maintaining a safe and productive work environment.

9.6. Continuous Improvement:

This discipline policy will be periodically reviewed and evaluated to ensure its effectiveness. Feedback from workers and supervisors will be considered to make necessary improvements to the policy and associated procedures.

10. Emergency escalation levels

The contractor shall use the following Emergency and escalating levels for the report of incidents & accidents.

Escalation level & criteria	Responsible party	When to inform GLODENI ENERGY S.R.L.	Related documents
Black – Crisis Abnormal & unstable situation that threatens project/GLODENI ENERGY S.R.L. objectives or reputation.	Responsible by GLODENI ENERGY S.R.L. crisis team and applicable contractors	Immediate after event or accident	Crisi Management Team (CMT) Emergency response plan
Red – Critical response High potential (near miss) incidents & accidents, LTIs, or unplanned events which could potentially harm project objectives or reputation	Response by Principal Contractor Emergency Response team (CMT) and applicable BoP Contractor	Within 12 hours	Project Emergency response plan
Yellow – Local response Local / project incidents, such as injuries, near miss, damages with low or medium severity. Potential delay or cost implication	Immediate response to incidents required by project team to protect people, environment, assets, infrastructure, operations	As per monthly Incident reporting	Local response team incident response
White – Nominal operations as per contractual agreement	No response required, activities as per HSE Plan	As per communication agreements	HSE Plan

End Of Document

On behalf of Contractor

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On behalf of Client

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Lazar Laura

Digitally signed by Lazar Laura
Date: 2025.10.01 12:45:27 +03'00'