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HSE MANAGEMENT SYSTEM

- **HSE GOVERNANCE**
- **HEALTH & SAFETY MANAGEMENT**
- **ENVIRONMENTAL POLICY**

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HEALTH SAFETY & ENVIRONMENT MANAGEMENT SYSTEM

HEALTH SAFETY & ENVIRONMENT POLICY

At ATP SpA, we value the wellbeing of our employees, contractors, customers, the communities in which we operate and the environment. We are committed to responsible management practices that minimise any adverse health, safety or environmental impacts, and enhance benefits associated with our activities, products or services.

We have in place a Health, Safety and Environment management system for our activities that drives continual improvement. The HSE Management System outlines accountabilities to implement this Policy and requires that we:

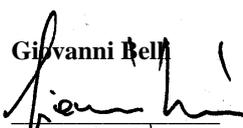
- Identify hazards and reduce risks to as low as reasonably practicable where there is potential to cause injury or illness to people, or to adversely impact the environment or the community
- Provide safe work places and systems of work, empower employees and contractors to address unsafe or hazardous situations and carry out their work in a manner that does not present a risk to themselves, others or the environment
- Support the recovery and rehabilitation of employees in the event of work related injury or illness.
- Set objectives and targets which promote the efficient use of energy and resources, the minimisation of wastes and emissions and the prevention of pollution
- Comply with relevant HSE legal requirements and other commitments
- Require Contractors to manage HSE using standards and practices that accord with this Policy
- Regularly review and report HSE performance.

In implementing this Policy we will engage with our employees, contractors, suppliers, business partners, customers and Government and communicate expectations to all persons working with or on behalf of ATP SpA.

Accountabilities

The Board is responsible for establishing and overseeing the Company's commitment to manage HSE in accordance with this Policy and for monitoring the performance of the Company with respect to its implementation.

The managing director is responsible for the implementation of the HSE Management System to ensure the commitments made in this Policy are being met.


 Giovanni Belli
 Managing director

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1. PURPOSE AND APPLICATION

ATP SpA's Health, Safety and Environment (HSE) Policy commitments are communicated and implemented through the HSE Management System. The HSE Management System and Standards apply to all HSE-related matters arising out of all Activities and operations controlled by ATP SpA and its related companies (together the company) and the impact of those Activities and operations on Employees, Contractors, the Environment and the communities in which the company operates. All of ATP SpA's businesses are required to provide appropriate information and to take appropriate actions as required by the HSE Management System to ensure compliance with the criteria established in this document.

The HSE Management System incorporates all HSE requirements in the company. The HSE Management System is designed to provide ATP SpA with a consistent approach to HSE management and to allow for the integration of HSE management processes and responsibilities with other business requirements. Individual businesses and sites establish the necessary HSE management plans that describe how HSE risks are managed. Businesses and Sites have the discretion to establish specific procedures where company-wide HSE directives do not cover issues specific to the Business.

Where the company does not have operational responsibility but has an equity stake or where significant ATP SpA assets are involved, the HSE Management System, which includes the HSE Management System Standards, provide the company benchmark for due diligence purposes.

We conduct ourselves and our business with due care and in accordance with relevant laws and regulations. We have an overriding duty to ensure the health and safety of our Employees, and to minimise the health, safety and environmental impacts on our customers and the communities in which we operate.

The HSE Management System is premised on the beliefs that effective management of health, safety and environment is based on a systematic approach with appropriate governance structures set in place and that each of us has clearly defined and unambiguous accountabilities that must be met to achieve that objective.

ATP SpA's HSE Management System is based on the continual improvement methodology of "Commit-Plan-Do-Check and Review".

The elements of the continual improvement loop are executed through a set of standards which interpret, support and provide further details to the requirements of the HSE Policy.

2. HSE GOVERNANCE

Governance is provided by the Board, the HSE Committee of the Board and the Operational Risk Committee.

2.1 ATP SpA Board

The Board is responsible for approving the Health, Safety and Environment Policy and:

- overseeing the company's commitment to its principles and values as they relate to the environment and the health and safety of Employees, Contractors, customers and the Community
- ensuring appropriate risk management systems are established and reports on performance are regularly reviewed
- reviewing the effectiveness of the company's governance compliance systems and corporate governance principles
- ensuring that the reputation of the company is protected and enhanced

2.2 HSE Committee of the Board

The role of the HSE Committee of the Board (HSE Committee) is to advise and support the Board in meeting its responsibilities in relation to HSE matters arising out of the activities and operations of ATP SpA and its related companies (together, the company). The HSE Committee is part of the Board, exercises its authority and is accountable to the Board for its performance.

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The HSE Committee makes recommendations to the Board to enable it to demonstrate its commitment and discharge its responsibilities in relation to HSE matters, having regard to the law and the highest standards of governance by:

- periodically reviewing and recommending to the Board an HSE Policy that clearly states the company's commitment to manage HSE related matters effectively
- periodically reviewing the company's annual and long term HSE performance objectives and targets
- reviewing major HSE risks and seeking assurance that measures to manage these risks and control their impacts are in place and effective
- seeking assurance of the company's compliance with HSE legal and regulatory requirements
- monitoring the company's HSE performance against its stated targets, including the implementation of an HSE Management System designed to verify that the commitments made in the Policy are being met and that HSE-related risks are being assessed, eliminated, avoided or controlled
- reviewing significant HSE incidents and HSE Management System failures, and monitoring the actions and measures to minimise the risk of recurrence
- seeking assurance regarding the adequacy and effectiveness of the company's HSE Policy and HSE Management System, including its functional leadership and structures

2.3 Operational Risk Committee (ORC)

Operational Risk arises from the company's physical operations or interaction with customers or communities and has possible outcomes that could have a material adverse impact on people, the Environment or the company's financial performance, assets or reputation. The Operational Risk Committee (ORC) comprises members of the Executive Management Team, Corporate Managers and Managers of the Operating business. Its role is to support management and the Board in fulfilling their responsibilities under the company's Risk Management Policy to identify and control Operational Risks.

In carrying out this role, the ORC will:

- review systems that are in place to identify and manage risk effectively
- review and prioritise risks that are identified and determine which of those risks should be monitored and reviewed corporately
- review Operational Risk related performance measures, incident reports and audit reports
- make recommendations to management on improvements to current operational management systems and the addition of new systems
- establish performance measures and targets for key Operational Risk management systems
- review the appropriateness of insurance policies to mitigate the company's financial exposure to Operational Risk
- review relevant external issues, trends and opinions

All company Personnel have the authority to place HSE considerations above other priorities. This extends to the authority of not doing something, unless it can be done safely, without posing a risk to themselves, others or the Environment.

All company Personnel have a duty to carry out their work in accordance with the ATP SpA HSE Management System to effectively manage HSE risks. At every level of the organisation our line managers are responsible for HSE, with the ultimate responsibility resting with the general managers and senior management teams.

3.1 Managing Director

The Managing Director is accountable for:

- the effective implementation of the HSE Policy and HSE Management System to meet commitments to stakeholders
- setting targets for HSE performance and improvement
- reviewing HSE performance and HSE Management System implementation to drive continual improvement
- implementation of leadership requirements specified in the HSE Management Standards

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3.2 Executive Director and Executive General Managers

The Executive Director and Executive General Managers are responsible for:

- setting expectations and providing resources for successful implementation of the Policy and HSE Management System within their business units
- providing clear definition of all Sites and/or Activities within their Business Units where this system applies, including transient sites, where Employees or Contractors undertake work or where the company owns plant, property or equipment
- reviewing the HSE performance of their businesses to ensure they meet company objectives and expectations
- implementation of leadership requirements specified in the HSE Management Standards

3. ACCOUNTABILITIES AND RESPONSIBILITIES

3.3 General Managers

General Managers are responsible for:

- the development and implementation of adequate and compliant HSE management plans covering all Sites and Activities that can affect the HSE risk or performance in their area of control
- all Sites and Activities within their control submitting information on the status and performance of their Sites and Activities as required under ATP SpA Directives and supporting materials
- the delegation of accountability to a responsible manager for the HSE performance of Sites or Activities
- the capability of all supervisors and managers appointed responsible for sites and activities to fulfil their requisite accountabilities
- involvement of all company employees and HSE Committees in the relevant HSE Plans for Sites and Activities within their Business Units
- assessing the existence and effectiveness of HSE plans through appropriate audits and reviews
- effective review and corrective actions in response to lessons learnt, incidents, defects, hazards, inadequacies of procedures and suggested improvements that are escalated from Sites and Activities within their area of responsibility
- implementation of leadership requirements specified in the HSE Management Standards

3.4 Managers and Supervisors

Managers and Supervisors nominated accountable for Sites and Activities are responsible for:

- adequate HSE management and action plans (including HSE goals, objectives and targets) existing for every Site or Activity for which they are responsible
- Employees and HSE committees being appropriately involved in the development of HSE management plans and aware of how these plans affect their work
- all individuals, for whom they are responsible, being adequately skilled for tasks they are expected to perform and work processes used being fit for purpose
- the use of company-wide procedures in the Site's HSE management plans. The development of Site specific procedures for tasks which are not covered by company-wide procedures
- the review of, and development of, corrective actions in response to lessons learnt, incidents, defects, hazards, inadequacies of procedures and suggested improvements reported within their area of responsibility
- providing appropriate resources for compliance with HSE laws and management of HSE risks in accordance with their delegated authorities
- the escalation of issues to the next level of management when the issue impacts other areas
- implementation of leadership requirements specified in the HSE Management Standards

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3.5 Chief Risk Officer

The Chief Risk Officer is responsible for:

- providing the governance systems, work processes and tools necessary to support the efficient and effective monitoring, analysis and reporting of HSE performance
- maintaining systems for tracking implementation of risk-based policies and systems, including the HSE Policy and HSE Management System requirements relative to HSE plans and stated responsibilities
- managing audit and assurance programs to determine the Businesses' compliance with HSE legal requirements and internal HSE requirements, including the HSE Management Standards
- governance reporting to the Managing Director, the Operational Risk Committee and the Board on matters including HSE performance, HSE Management System performance and the HSE risk position of the company

3.6 Group Manager HSE

The Group Manager HSE is responsible for:

- developing HSE strategy consistent with HSE Policy and including ATP SpA's goals, objectives and targets
- developing and improving the HSE Management System to meet the needs of the company and the expectations of its stakeholders
- communicating and coordinating the implementation of the HSE Policy and HSE Management System in an effective and efficient manner
- providing access to and advice regarding HSE laws, regulatory requirements and applicable standards that the company and its operations must meet across the various jurisdictions in which it operates
- developing and issuing HSE Directives and Toolkits where there are common HSE issues across the company
- defining general HSE responsibilities, accountabilities and competency requirements for Managers and supervisors responsible for Sites and Activities
- providing guidance on the development of HSE management plans and action plans
- coordinating the sharing of tools and methods to maximise efficiency. This includes ensuring appropriate training is available where the competencies addressed by the training are common across the organisation
- providing leadership and advice on HSE practices, including advice on company-wide initiatives such as minimum personal protective equipment (PPE) requirements and new practices which may assist in the reduction of incident recurrence and injury severity

3.7 HSE Managers

HSE Managers for the Business Units are responsible for:

- providing technical advice on the implementation of the HSE Management System
- reporting incidents and other HSE reporting requirements within their Business Unit
- quality control of incident data input to company databases
- coordinating HSE related training needs for their Business Unit
- coordination and close out of all actions deriving from HSE incident investigations
- communicating HSE alerts of interest to Group HSE for wider communication
- contributing to the development of company-wide HSE documents

3.8 Workplace HSE Representatives

Workplace HSE Representatives (HSE committees) are responsible for:

- highlighting Employee concerns about workplace hazards, unsafe practices and HSE performance
- formally escalating HSE issues to management

3.9 Employees and Contractors

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Each Employee of and Contractor to ATP SpA is responsible for:

- the HSE implications of their own actions and each has a duty to follow instructions and training and to carry out their work in a manner which does not present a risk to themselves, others or the Environment
- reporting all incidents, defects, hazards and inadequacies of procedures so that appropriate review and corrective action can be taken
- suggesting improvements and being active in the general improvement of all systems and methods of work to ensure ATP SpA's operations are carried out in a personally and environmentally safe, reliable and cost effective way

All Employees and Contractors have the authority to place HSE considerations above other priorities. This authority empowers Personnel to not undertake a task, unless it can be done safely and without posing a risk to themselves, others or the Environment.

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4. ATP SPA HSE MANAGEMENT SYSTEM

ATP SpA's HSE Management System is hierarchical. Mandatory requirements are established by the HSE Policy, HSE Management Standards and directives. Requirements at any level must meet and support the requirements at higher levels.

The HSE Policy, HSE Management Standards and directives are mandatory and apply to all company controlled sites and activities.

4.1 HSE Policy and HSE Management Standards

There is a single HSE Policy, issued by Group HSE, approved by the Board and signed by the Managing Director. It establishes a framework for common HSE practices and expectations across all levels of the company.

Approved by the Operational Risk Committee, the HSE Management Standards - interpret, support and detail the requirements of the company's HSE Policy and form the basis for the development and application of HSE plans at all levels in the company.

4.2 Directives and Toolkits

HSE Directives mandate the minimum requirements, the responsibilities and the business rules that are needed to implement the HSE Policy and HSE Management Standards. Directives may refer to other supporting materials or Toolkits that include documents such as procedures, guidelines, checklists and forms.

Key HSE documents including the HSE Policy, HSEMS, Directives and Toolkits are available on Source.

4.3 HSE Plans and Procedures

All company controlled Sites and Activities must be covered by a relevant HSE Plan that describes the management arrangements (HSE management plan) and actions (HSE action plan) required to implement the HSEMS at each Site and Activity. HSE management plans and HSE action plans detail What, Where, How, When and by Whom HSE matters are planned, allocated to responsible owners, implemented, measured and reviewed.

Every work place is required to have a relevant HSE management plan in place for controlling assessed risks and have processes in place for assessing new risks and addressing corporate and external reporting requirements, close out of audit findings, licence conditions, audit and inspection schedules, training requirements etc. Appropriate work methods are then developed. These requirements are formalised in Business Unit or Site based HSE management plans that define the work to be done and the way that work should be managed. These plans need to include, but are not limited to coverage of the following issues:

- Risk management
- Operational safety
- Environmental management
- Waste management
- Legal compliance
- Competence based training

All requirements can be included in a single HSE plan or be separated by topic.

- Business Unit HSE procedures

Apply within the Business Unit where they are issued and are intended to complement the mandatory ATP SpA directives for those Activities which are exclusive to the Business Unit.

- Site operational HSE procedures

Apply within Sites and operations where they are issued to cover Activities controlled by the relevant Business Unit and are intended to support the mandatory ATP SpA directives for issues and tasks specific to that Site.

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5. HSE MANAGEMENT STANDARDS

The HSE Management standards are aligned with the requirements of company HSE Policy and recognised international and national standards including ISO 14001, OHSAS 18001, ISO 31000 and AS 4801 and support the company in its efforts to comply with legal obligations regarding HSE. The objectives of the standards are to:

- set and formalise expectations for the progressive development and implementation of more specific requirements within ATP SpA Business Units
- provide auditable criteria against which the HSE Management System can be measured
- provide a basis from which to drive continual improvement

The HSE Management Standards mandate what must be achieved rather than how to achieve it. Therefore Business Units have the flexibility to meet the requirements of the standards in a way which best suits their own business while maintaining consistency of approach across the company.

The system also provides mechanisms for assurance of diligence, so that in the event of a failure, it can be demonstrated that all reasonable and foreseeable steps have been taken to avoid the failure.

The HSE Management Standards outline requirements in the areas of HSE and Community with the aim to:

- Health and Safety
 - Protect, promote and improve the health and wellbeing of ATP SpA's employees
 - Minimise and manage occupational exposures to all personnel
 - Minimise adverse impacts of our operations to host communities
 - Provide a work environment where people are able to work safely and understand their rights and obligations towards a safe workplace
 - Promote a rewarding workplace for Employees by encouraging personal development , recognising good performance, valuing teamwork and fostering equality of opportunity
- Environment and Community
 - Promote the reduction and prevention of pollution, efficient use of resources and energy and biodiversity protection
 - Promote a culture of benefiting and respecting the rights and interest of the Communities in which we operate, consideration of the environmental and social impact of the resources, products and services we use or provide to others and caring about our impact on customers, colleagues, the Community, Environment and shareholders

Intent

The Board and Executive Management establish the HSE Policy, set expectations and provide resources for successful implementation of the HSE Policy and HSE Management System.

Directors, managers, supervisors and Employees and Contractors at all levels demonstrate leadership and commitment to HSE.

Performance Requirements

1.1 ATP SpA maintains a HSE Policy that reflects the nature, scale and potential HSE impacts of the company's Activities, products and services.

1.2 The HSE Policy is reviewed every two years and approved by the ATP SpA Board and signed by the Managing Director.

1.3 The ATP SpA Board of Directors seeks assurance of conformance with the HSE Policy and systems and regularly reviews HSE performance and risks.

1.4 ATP SpA Business Units and Sites define and document the scope of their HSE management plans and procedures in conformance with ATP SpA's HSE Management Standards.

1.5 ATP SpA Business Units and Sites integrate the requirements of the HSEMS (including these HSE Management Standards) into their business and site management systems and operating procedures.

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1.6 Systems are in place to recognise, reinforce and reward HSE innovation, initiatives, desired behaviours and outcomes.

1.7 The company and its Contractors have systems in place to ensure Employees and Contractors are aware of expected HSE behaviours and have a clear understanding of the consequences of inappropriate conduct.

1.8 Managers demonstrate visible leadership and proactive behaviours by personal example, and reinforce HSE excellence by communicating HSE issues, setting HSE goals, objectives and targets, promoting HSE improvement initiatives, participating in audits and by conducting frequent site inspections, which include HSE reviews and behavioural observations.

1.9 All Employees demonstrate by their day-to-day actions a visible commitment to HSE.

1.10 Managers promote the sharing of HSE lessons learned inside and outside their Business Unit.

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Standard 1

LEADERSHIP AND COMMITMENT

Intent

For directors, managers, supervisors and Employees and Contractors at all levels, their accountabilities, roles, responsibilities and authority relating to HSE are clearly defined, documented, communicated and understood throughout ATP SpA.

Performance Requirements

2.1 HSE roles, responsibilities, authorities and accountabilities, including those arising from the HSE Policy and HSE Management Standards and personal HSE goals, objectives and targets, are documented, known, exercised and adhered to. The allocation of responsibilities and accountabilities and the delegation of authorities are documented and communicated.

2.2 The Managing Director of ATP SpA is ultimately responsible for the HSE performance of the business, including the effective implementation of the HSE Policy and supporting HSE Standards.

2.3 Managers provide sufficient resources (i.e. human, financial and infrastructure) to maintain legal compliance and to support effective HSE management including the implementation, maintenance, monitoring and reporting of the HSE Management System and the provision of competent HSE advice.

2.4 At every level of the organisation, line managers are responsible for HSE.

2.5 Personnel with appointed or elected HSE responsibilities provide Employees and Contractors with HSE advice, assistance and expertise relevant to their position as required.

2.6 All Personnel are responsible for the HSE implications of their own actions and have a duty to carry out their work in a manner which does not present a risk to themselves, others and/or the Environment. Individual performance will be monitored and reviewed against agreed responsibilities and accountabilities.

2.7 Systems are in place to clearly communicate to Personnel that they have both the right and the responsibility to stop work or refuse to work in situations that may cause harm to health, safety or Environment, and to immediately bring these situations to the attention of those at immediate risk and to company management.

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Standard 2

ORGANISATION, ACCOUNTABILITY, RESPONSIBILITY AND AUTHORITY

Intent

A systematic risk based approach to the management of HSE is in place as an integral part of business planning, with HSE goals, objectives and targets established and measured. A philosophy of continual improvement is applied to HSE.

Performance Requirements

3.1 Business planning activities at all levels of ATP SpA include HSE considerations.

3.2 On an annual basis ATP SpA sets company-wide HSE goals, objectives and targets consistent with the HSE Policy and HSE Management System to drive performance improvement. These goals, objectives and targets are linked to leading and lagging indicators that are measurable, documented, communicated and reviewed.

3.3 Business Units set annual targets that support the achievement of ATP SpA company-wide targets and take into account significant risks, legal and other compliance requirements and the interests of relevant stakeholders.

3.4 Managers, team and individual KPIs are set that support the achievement of company and Business Unit targets. These KPIs are assessed as part of reward schemes and individual performance evaluation.

3.5 HSE action plans are established which include clearly designated responsibilities, time-frames, resources and actions to achieve goals, objectives and targets. HSE risks are considered in the development of goals, objectives and targets in HSE action plans.

3.6 Systems are established to periodically monitor and report the implementation of these goals, objectives and targets including the tracking of KPIs.

3.7 Where conflicts exist between HSE goals, objectives and targets and other business goals, objectives and targets, resolution is consistent with the requirements of these HSE Standards.

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Standard 3

PLANNING, OBJECTIVES AND TARGETS

Intent

Relevant legal and regulatory requirements and voluntary commitments are identified, documented, made accessible, understood and complied with wherever ATP SpA operates. Effective HSE document control systems are in place to ensure clarity of company expectations and to facilitate efficient and accurate information management.

Performance Requirements

- 4.1 HSE-related acts and regulations are maintained and available.
- 4.2 Legislative and regulatory requirements (including licences, permits and approval conditions) and voluntary commitments applicable to specific ATP SpA operations are identified and documented in a Site register.
- 4.3 Regulatory registers are reviewed and kept up-to-date and all changes are communicated to all relevant personnel.
- 4.4 Where ATP SpA or its Business Units undertake voluntary public commitments in relation to HSE, these commitments are to be regarded and implemented with the same diligence as regulatory requirements.
- 4.5 Wherever possible, legislative and other external requirements are incorporated into the relevant operational procedures to ensure consistent, ongoing compliance with these requirements.
- 4.6 Compliance with legal and other requirements is demonstrated, evaluated and reported.
- 4.7 Where local legal requirements diverge from these Standards, Activities comply with the more stringent of local legal requirements and these Standards.
- 4.8 In countries where local legislation does not require an adequate level of HSE performance, Activities are conducted in a manner that is consistent with the requirements of these Standards, and relevant international standards, taking into account social and cultural sensitivities.
- 4.9 Systems are in place to identify which documents are to be controlled and to ensure that these documents are controlled with current versions readily available.
- 4.10 Systems are in place to ensure that HSE records are established, maintained, accurate, legible and identifiable and also to manage the archiving and disposal of HSE records.
- 4.11 HSE records have established retention times, consistent with legal requirements and knowledge preservation, and are assigned to responsible custodians.
- 4.12 Employee health, medical and occupational exposure records are maintained and retained as necessary, with appropriate confidentiality in place.

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Standard 4

LEGAL REQUIREMENTS, DOCUMENT CONTROL AND INFORMATION MANAGEMENT

Intent

Employees' competence and appropriate behaviours are critical for the safe control of operations and general company success. Employees are carefully selected, trained and supported. Competence and behaviours are regularly assessed and monitored. Contractors are to provide competent workers and regularly assess and monitor their competence and behaviours.

Performance Requirements

5.1 Recruitment, selection and placement processes ensure that personnel are competent for their assigned tasks.

5.2 The company and its Contractors have systems in place to provide inductions for Employees, Contractors and Visitors new to the Site or Activity and HSE training and awareness sessions for relevant personnel. Inductions will cover relevant HSE hazards, Risk Assessments, controls, behaviours, company objectives, policy, systems and procedures. Compliance with HSE requirements covered by the induction will constitute a condition of entering or remaining on company property.

5.3 Personnel have the required skills and training to competently perform their tasks in a healthy, safe and environmentally sound manner.

5.4 The company and its Contractors have systems in place to ensure:

- qualifications and competency requirements for positions are documented and periodically reviewed
- training needs are identified in consultation with employees,
- training schedules and programs are developed and include ongoing periodic refresher training,
- training is provided by people with appropriate knowledge, skills and experience
- competency assessments are undertaken, and
- training and assessment records are maintained

5.5 Each Safety Critical Role or task and the personnel who perform these tasks are assessed for necessary competencies and skills, utilising formal competency-based assessment.

5.6 The company and its Contractors shall train and assess their respective workers in the control and elimination of at-risk behaviours, including the consequences of departure from specified company procedures.

5.7 Systems that reinforce positive HSE behaviours are in place and draw attention to "at-risk" behaviours.

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Standard 5

PERSONNEL, COMPETENCE, TRAINING AND BEHAVIOURS

Intent

Effective, transparent and open communication and consultation with legitimate stakeholders is valued and undertaken across the company.

Performance Requirements

6.1 Open and proactive communications are established and maintained with Employees, Contractors, regulatory agencies and communities regarding the HSE Policy, HSEMS and Standards.

6.2 Internal communication and consultation processes are in place to deal with HSE matters. These processes include HSE Committee meetings, toolbox meetings and other site HSE meetings. Meetings include relevant HSE issues.

6.3 Systems are in place to identify stakeholders and to receive, analyse and respond to community concerns and complaints regarding the company's Activities, products and services.

6.4 Mechanisms are in place to resolve conflicts where they arise, through consultation and participation with stakeholders and their intermediaries.

6.5 Host communities and their traditional heritage and values which could potentially be affected by the company's Activities, are identified. Communities are engaged and strategies are developed to eliminate or minimise negative impacts.

6.6 Where community health hazards are identified, these are assessed, managed and communicated to potentially impacted communities and other relevant stakeholders, for example public health and other authorities.

6.7 Arrangements are established for communication with, and the provision of relevant HSE related information to, governments, authorities and other organisations and local communities.

6.8 Systems are in place to regularly assess the general community's expectations of ATP SpA as a corporate citizen. Processes are established to respond to external feedback and engage with the general community.

6.9 Systems are in place to communicate internally and externally the company's HSE goals and publicly report HSE performance. Identified significant HSE risks and impacts are communicated to relevant stakeholders.

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Standard 6

COMMUNICATION, CONSULTATION AND COMMUNITY INVOLVEMENT

Intent

HSE hazards and risks associated with the company's activities are identified, assessed and managed to prevent or reduce the likelihood and consequence of incidents.

Performance Requirements

7.1 ATP SpA has established a Risk Management Policy. As required under that Policy, HSE risk management is applied to all Activities that ATP SpA controls or significantly influences.

7.2 Risk is managed by identifying hazards, assessing consequences and probabilities, evaluating risk and implementing preventive and mitigation measures.

7.3 Risk Assessments are conducted by competent personnel with the relevant knowledge and experience.

7.4 Potential health, safety and environmental hazards are identified and recorded for existing operations, products, business developments, acquisitions, modifications, new projects, closures and divestments. This process takes into account risks to personnel, facilities, the public, customers and the Environment.

7.5 Business Units establish and maintain a Risk register containing identified hazards and risks. Risk register contents include the risk title and classification, risk causes, consequences, exposure, probability, likelihood, plus existing controls and monitoring or control effectiveness as well as links to HSE action plans and the setting of goals, objectives and targets.

7.6 Business Units must identify all Critical Activities/tasks that have the potential to result in serious injury to people, serious environmental impact or a Major Accident Event. Critical Controls designed to mitigate the risks of serious injury to people, serious environmental impact or a Major Accident Event include Critical Systems, Critical Equipment and Critical Procedures and must be recorded in the Risk Register.

7.7 ATP SpA maintains an enterprise-wide Risk Register containing those risks escalated from the Business Units and Corporate Groups, plus any additional risks identified at the company and/or Board level.

7.8 Risk registers are reviewed at least annually, and following a significant change or Significant Incident to reflect learnings and changes.

7.9 Where risk cannot be eliminated, control measures are selected and prioritised using the hierarchy of controls and implemented to effectively manage identified risks.

7.10 Where risks identified exceed specified threshold and immediate mitigation is not possible, the level of risk being tolerated and managed by the Business Unit must be escalated in accordance with ATP SpA's Risk Management Directive.

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Standard 7

HAZARD AND RISK MANAGEMENT

Intent

HSE incidents, including near misses, are reported, investigated, and analysed to ensure that preventive actions are taken and learnings are shared throughout the organisation.

Performance Requirements

8.1 Systems are in place for timely reporting, investigation and appropriate communication of all HSE incidents to meet ATP SpA's incident management requirements.

8.2 Incidents, near misses and hazards are reported and used as valuable opportunities for learning.

8.3 Systems are in place for full compliance with applicable legislative requirements related to incidents, including reporting to authorities, keeping of records, investigations and other actions as required in each jurisdiction.

8.4 Incident investigations, including identification of root causes and preventative actions, are conducted. The level of the investigation is appropriate to the actual or potential consequence of the incident.

8.5 Significant Incidents are immediately notified to General Counsel who will provide such initial legal advice to the Business Unit General Manager as may be required (including advice on the steps to be followed) and commission (where needed) an investigation by a multifunction team led by a competent independent investigator, who will report to General Counsel to enable appropriate legal advice to be given to the company.

8.6 In the event of a Significant Incident, systems are in place to prevent resumption of work until the risk is assessed, and actions have been taken to reduce the risk of recurrence, to the satisfaction of regulators/relevant authorities (if required). Authorisation to resume work is then given by the appropriate level.

8.7 Where possible, information gathered from reported incidents and incident investigations is analysed to identify trends and is used in the improvement of systems and procedures.

8.8 Systems are in place to follow up and close out all identified corrective actions within acceptable timeframes.

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Standard 8

INCIDENT MANAGEMENT

Intent

Health, Safety, and Environmental performance data is collected, analysed and reported to monitor and evaluate ongoing HSE performance and drive continual improvement.

Performance Requirements

9.1 Processes are in place to ensure HSE performance is regularly measured, monitored, recorded and analysed with results reported to internal and external stakeholders as appropriate.

9.2 The reported data is collated and analysed, as appropriate, and reported to Personnel who have the responsibility to take action on the basis of this information. Reporting of consolidated data including HSE key performance indicators, shall be carried out at Site level, Business Unit level and for the whole of ATP SpA, as the basis for decision making.

9.3 Group HSE provide HSE reporting requirements and processes and maintain a database containing what is required for both internal performance evaluation and external reports.

9.4 Business Units measure and report HSE performance data on a monthly basis or more frequently if appropriate (e.g. for Significant Incidents) as per ATP SpA's requirements.

9.5 Prevalence and incidence of work-related injury and illness is recorded, assessed and reviewed using data available from all sources including medical surveillance programmes and incident related medical treatment.

9.6 Group HSE periodically aggregate and analyse HSE performance data for all ATP SpA businesses and provide feedback and advice to the businesses on initiatives to drive improvement in HSE performance.

9.7 Systems are established to ensure the appropriate reporting of HSE performance to relevant authorities and/or other stakeholders, as required by legislation or company voluntary commitments.

9.8 Relevant HSE systems and performance information is routinely communicated by ATP SpA management to relevant Personnel.

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Standard 9

PERFORMANCE MEASUREMENT AND REPORTING

Intent

All works at Sites and Activities that have the potential to cause harm to the health and safety of people, or the Environment, or to cause damage to equipment, are carried out in accordance with plans and documented procedures, so as to ensure safe work practices.

Performance Requirements

10.1 Sites and Activities have operational HSE management plans (including descriptions of operations), systems and procedures established, implemented and maintained where relevant HSE risks have been identified.

10.2 Plans and procedures address the required method for carrying out the company's work Activities and managing other operational aspects and include specific responsibilities. As a minimum, procedures are required which cover induction, locking, tagging and isolation procedures, and also communication at shift handover.

10.3 Plant and equipment drawings, manuals, design data and operating limits are documented, understood and available.

10.4 Key operating risks, including Safety Critical Activities are measured, monitored, analysed and reviewed.

10.5 Risks introduced by high Activity levels, by Activities which are unusual or infrequent, or by the interaction of Activities, are assessed and managed.

10.6 Systems are in place to manage and formally document the activation, maintenance, isolation and deactivation of safety Critical Equipment and other Critical Controls.

10.7 A permit to work process is in place which incorporates checks and authorisations consistent with mechanical and operational risks. As a minimum, the permit to work system covers hot work, confined space and excavation permits.

10.8 Applicable laws, regulations, permits and other regulatory requirements for operational Activities are met, and the resulting operating requirements are documented and communicated to those affected. Compliance with these requirements is periodically verified.

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Standard 10

OPERATIONAL CONTROL

Intent

All temporary and permanent changes to the organisation, Personnel, systems, procedures, equipment, products and materials are identified and managed to ensure HSE risks arising from these changes remain at an acceptable level.

Performance Requirements

11.1 Formal processes and documented procedures are in place for the effective assessment and management of risks associated with temporary and permanent changes. Procedures include the recording and tracking of any change which has the potential to affect the health and safety of people or the Environment.

11.2 The Risk Assessment of a change is appropriate to the nature of the change and the exposure associated with it.

11.3 The process for managing changes addresses the authority for approval of changes, compliance with all relevant regulations, applicable standards and permits, licence or authority requirements, documentation (including reasons for the changes), deadlines and training requirements.

11.4 The risks and impacts arising from changes are communicated to relevant stakeholders, monitored and managed.

11.5 Systems are in place to ensure change management actions have been completed, their intended outcomes validated, relevant systems and documentation, (including drawings) updated and any unintended risks identified and managed.

11.6 The ATP SpAal scope and duration for temporary changes do not exceed ATP SpAal authorisation without formal review and approval.

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Standard 11

MANAGEMENT OF CHANGE

Intent

Assessment and management of HSE risks is an integral part of project design, construction and commissioning to enable sound HSE performance throughout the construction and operational life of the facility. Decommissioning plans are established for new projects and existing facilities.

Performance Requirements

12.1 The planning, design and selection of new Sites, plant, equipment and processes takes into account known and projected HSE aspects and risks, and considers provisions for maintenance, modification, decommissioning, disposal and closure.

12.2 Project HSE plans and procedures establishing technical integrity, HSE specifications and quality assurance requirements are established, documented, understood and their implementation is verified.

12.3 Technical standards for design, construction and commissioning (including any modifications) are compliant with legislation, relevant industry codes and standards. Sound engineering practices and risk management principles (e.g. Quantitative Risk Assessments, HAZOPS and HSE reviews) are utilised.

12.4 Facilities are designed and constructed using technology which balances HSE and commercial risks with financial benefits. A process is established to evaluate and demonstrate that technical risks, biodiversity, social and environmental impacts as well as the minimisation of emissions and discharges are considered.

12.5 Design reviews for constructability, operability and maintainability for maintenance of plant, equipment and systems ensure HSE risks and related considerations are effectively identified, addressed and documented.

12.6 A commissioning plan is documented and approved so that it incorporates HSE risk management and defines responsibilities and competencies. The plan ensures that the facility, plant and equipment conform to required standards for start-up and operability.

12.7 Decommissioning, remediation and restoration plans are established, costed and reviewed regularly using risk-based studies for end of life equipment and/or facilities.

12.8 Operational, maintenance and HSE expertise are integrated early in the project/design stage. Experiences from previous projects and current operations are applied.

12.9 Pre and post-start up reviews are conducted and documented to confirm that:

- construction is in accordance with specifications
- operations integrity measures are in place
- emergency, operational and maintenance procedures are in place and are adequate
- risk management recommendations have been addressed and required actions taken
- training of Personnel has been accomplished and documented
- regulatory and licence and/or other permit requirements are met.

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Standard 12

FACILITIES DESIGN, CONSTRUCTION, COMMISSIONING AND DECOMMISSIONING

Intent

Contractors, Suppliers and Partners are assessed for their capabilities and competencies to perform work on behalf of ATP SpA, and to ensure their HSE performance is aligned with these Standards. Effective arrangements are in place to safeguard the health and safety of Visitors to ATP SpA Sites.

Performance Requirements

13.1 Processes are in place for the pre-qualification, selection and retention criteria for work performed by Contractors, Suppliers and others (third parties), along with a system for assuring their compliance with these criteria. These processes include Risk Assessments associated with the services provided.

13.2 Selection criteria include the Contractors' and/or Suppliers' commitment to HSE, their HSE Management Systems, requirements and specifications related to their equipment, materials, products, services and performance.

13.3 Contracts include specific HSE requirements that Contractors must comply with. It is a line management responsibility to assess competency on an ongoing basis.

13.4 Business Partners, Suppliers of goods and services, and customers are encouraged to establish and maintain systems consistent with these HSE Management Standards.

13.5 Suppliers and Contractors are required to provide information on the Risk Assessment performed and the identified hazards associated with their equipment, products and services, prior to their delivery or commencement of work whenever changes occur.

13.6 Suppliers and Contractors are required to provide information on the measures undertaken, or to be undertaken, to control the risks and hazards identified by them.

13.7 Interfaces between organisations providing and receiving services are effectively managed including the mechanism of dealing with interaction with other plant operators/contractors in the same vicinity, how they will be dealt with, the risks to be controlled and the responsibilities identified.

13.8 Third party HSE performance is monitored and assessed, feedback is provided and deficiencies are highlighted for correction.

13.9 When third parties are performing services on behalf of ATP SpA at a defined ATP SpA controlled Site, their HSE performance is considered within ATP SpA's overall HSE performance.

13.10 Contract Employees will be integrated into ATP SpA's HSE Activities

13.11 Visitors to ATP SpA's Sites receive HSE induction appropriate to the nature of their visit and the Site hazards they may be exposed to. Compliance with the HSE requirements included in the induction constitutes a condition of entering or remaining on ATP SpA's property.

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Standard 13

CONTRACTORS, SUPPLIERS, PARTNERS AND VISITORS

Intent

Plans, procedures and resources are in place to effectively respond to crisis and emergency situations, to protect the workforce, the Environment, the public and customers, and to preserve the company's assets and reputation.

Performance Requirements

14.1 Systems are in place to identify potential emergency situations and their impacts.

14.2 Crisis, emergency and business continuity plans are documented, assessed and clearly communicated. Emergency equipment is made available and maintained in good order.

14.3 Emergency response plans must consider and document external interfaces, for example with the emergency services.

14.4 Emergency planning and response priorities are to be considered in the following order: the health and safety of people, protection of the Environment, preservation of ATP SpA's reputation and operability.

14.5 Personnel are trained to understand and implement crisis, emergency and business continuity plans, with respect to their own roles and responsibilities in the event of an emergency.

14.6 Minimum competence and training requirements (appropriate for likely hazards at Sites and plant/equipment controlled by the company) are established for Site emergency Personnel.

14.7 Simulations and drills are periodically conducted including liaison with, and involvement of, relevant external stakeholders.

14.8 Plans are updated to incorporate learnings from previous incidents, incident investigations, drills and exercises and audit outcomes.

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Standard 14

CRISIS AND EMERGENCY MANAGEMENT

Intent

ATP SpA's facilities, plant, equipment, machinery and tools are purchased, designed, constructed, commissioned, operated, maintained, modified and decommissioned in a manner that ensures HSE risks are effectively managed.

Performance Requirements

15.1 Systems are in place to ensure that plant and equipment are operated strictly within their operating design parameters and capabilities.

15.2 Personnel operating and maintaining equipment are suitably competent and, where applicable, formally qualified.

15.3 Systems are established, documented and maintained to ensure the ongoing integrity of plant and equipment. These include procedures for maintenance, inspection, testing calibration and certification of equipment, at frequencies appropriate for the level of risk associated with the equipment, and legal and/or manufacturer's requirements.

15.4 The systems track and rectify deviations identified from the Activities above. The systems include procedures to maintain operational integrity whilst Safety Critical Equipment is out of service.

15.5 Critical Equipment that is newly installed, or is returned to service following maintenance or modification, is subject to documented inspection and testing prior to use to ensure that operational integrity is maintained. Installers must not install the equipment unless they also certify the installation and provide evidence of the certification status.

15.6 The frequency of scheduled maintenance, inspections, tests and calibration is determined with consideration to the level of risk associated with the equipment and recognised industry standards and/or manufacturer requirements.

15.7 Systems are established and maintained to control the suitability, quality and availability of maintenance consumables and spare parts.

15.8 A Site register and supporting records are established and maintained of all scheduled programs for maintenance, inspection, testing and calibration of facilities, plant, equipment, machinery and tools.

15.9 Systems are in place to ensure that any person who becomes aware of a safety risk with any work practice, plant or equipment, advises the relevant supervisor and/or operator and the report is recorded and acted upon.

15.10 Processes are in place for the calibration, maintenance, use and storage of monitoring and measurement equipment used in association with HSE risks and controls.

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Standard 15

PLANT AND EQUIPMENT

Intent

HSE risks to Personnel associated with the working environment are eliminated or reduced as far as reasonably practicable.

Performance Requirements

16.1 Systems are in place for the identification of hazards and occupational health exposures associated with the working environment, including:

- biological
- physical
- chemical
- psychosocial
- ergonomic
- geographic location

16.2 Where occupational health exposures and hazards are identified, they are risk assessed and documented, appropriate corrective and preventative action is taken and effective control of those hazards and exposures is provided.

16.3 Procedures are established and maintained for management of the working environment and monitoring the effectiveness of controls for occupational health hazards and exposures.

16.4 Procedures are put in place to achieve appropriate security and well being of Employees on Sites and during work related travel or Activities.

16.5 Health and hygiene aspects of the operations are monitored by surveillance programmes covering good house keeping and key exposures to Personnel and host communities.

16.6 The results of monitoring are formally reviewed and communicated to affected work groups on a regular basis and where required, appropriate actions are taken.

16.7 Plans and procedures are in place for the control of working hours and the response to and prevention of workplace violence, victimisation and harassment.

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Standard 16

MONITORING THE WORKING ENVIRONMENT

Intent

ATP SpA encourages a healthy lifestyle for its Employees, and provides appropriate medical treatment, and assistance for return to work in the event of employees sustaining work related injuries.

Performance Requirements

17.1 First aid facilities, ready access to adequate medical services and relevant health monitoring programmes shall be provided to all Employees at all work locations.

17.2 A risk based approach is taken to assessing Employees' fitness for work. Employees are assessed for their fitness for work, where appropriate. This includes undergoing medical assessment to establish fitness to carry out work tasks either as a pre-employment or pre-transfer medical assessment for safety critical positions. Confidentiality of medical records is maintained in all cases. Contractors assess the fitness for work of their own employees.

17.3 Formal programs to promote health and fitness for work are in place and appropriately evaluated.

17.4 Preventative and corrective measures are taken to manage risks associated with fitness for work including alcohol and drugs, fatigue and medical conditions. Measures include Employee Assistance Programs.

17.5 Systems are in place for the rehabilitation of Employees following work-related injury or illness or other adverse health effects. Employees suffering non work-related injuries or illness are assisted in their return to work, as appropriate.

17.6 Where appropriate and available, alternative duties are offered to Employees who are unfit for their normal duties. Employees who are unfit for any duties are assessed at regular intervals to determine their continued unsuitability. Alternative duties or return to normal duties are encouraged as soon as it is medically possible.

17.7 Timely medical services are made available to all Employees who have sustained a work-related injury, illness or other adverse health effects; and arrangements are established and maintained for the injury management and rehabilitation of Employees following a work- related injury, illness or other adverse health effects.

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Standard 17

HEALTH AND FITNESS FOR WORK

Intent

Potential adverse environmental effects resulting from the company's operations and activities are identified, assessed and monitored and as far as reasonably practicable, eliminated or minimised.

Performance Requirements

18.1 Potential and actual environmental effects of any of the company's Activities, operations, or proposed new developments are identified, assessed and monitored. Specialist advice is utilised where appropriate.

18.2 Environmental risks to be addressed cover the lifecycle of the project and/or operations or other Activities and include, but are not limited to, the following: spills to land or water, accidental discharges to the Environment, emissions to air, odours, greenhouse gas emissions, ozone depleting substances, fire, noise, ecosystem disturbance, soil conservation, contaminated land and its remediation and heritage impacts.

18.3. Environmental risks are entered in risk registers, are formally reviewed on a regular basis, and where required, appropriate actions are taken and monitored.

18.4 Environmental risks are addressed and controlled consistent with policy, regulatory requirements and business plans.

18.5 Each ATP SpA operational Site establishes and maintains a risk register that includes environmental risks based on the outcome of the environmental Risk Assessment and takes appropriate steps to minimise the adverse effect of the operations or Activities on the Environment.

18.6 Where statutory requirements apply, the assessment of environmental effects or environmental impact assessment is compliant with applicable acts and regulations and/or by laws and/or undertaken to the level required by the authorities.

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Standard 18

ENVIRONMENTAL EFFECTS AND MANAGEMENT

Intent

The lifecycle HSE impacts of ATP SpA's products and services are assessed and communicated to customers and users to enable responsible usage management. Consumption of resources and materials is minimised as far as reasonably practicable. Wastes are eliminated, reduced, recycled and/or reused as far as reasonably practicable or disposed of appropriately.

Performance Requirements

19.1 Assessments are conducted for new and existing products and services prior to marketing or distribution to identify any applicable mandatory standards as well as health, safety and environmental hazards and risks associated with product characteristics for normal use and foreseeable misuse.

19.2 Up-to-date advice is made available to Employees, Contractors, distributors, customers and the community regarding the purpose of the products and the possible HSE hazards associated with the production, transport, storage, use, foreseeable misuse, maintenance, recycling and disposal of ATP SpA's products.

19.3 Systems are in place to:

- record and assess any consumer complaints that relate to product safety
- issue any warnings or recall notices as appropriate in the event that the product has a defect that creates a risk of injury to the public and/or is not as reasonably safe as persons are generally entitled to expect
- monitor compliance with legislative requirements for any product recall

19.4 Site specific management plans for land, water and energy conservation and greenhouse gas are developed, implemented and maintained as required. These plans aim to drive the most efficient use of energy and resources and to minimise usage through the setting of documented objectives and targets.

19.5 Programs are in place to ensure that wastes are eliminated, reduced, reused, recycled, treated and/or properly disposed of.

19.6 Systems are in place to identify, quantify and monitor all wastes generated. Records are kept to ensure that all wastes can be tracked from source to disposal, and waste receiving facilities are audited to ensure conformance to appropriate waste standards.

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Standard 19

PRODUCT STEWARDSHIP, CONSERVATION AND WASTE MANAGEMENT

Intent

HSE performance and systems are monitored and assessed through periodic reports and audits to identify trends, measure progress, assess conformance and drive continual improvement. Management system reviews are conducted to ensure the continuing suitability, adequacy and effectiveness of the HSEMS.

Performance Requirements

20.1 HSE performance and management system status are regularly reported to, and reviewed by the Executive Management Team and the Board.

20.2 HSE inspections are scheduled and conducted at Sites at frequencies appropriate to the assessed level of HSE risk. Inspections monitor key operational characteristics that can cause illness, injury or adverse environmental effects.

20.3 HSE audits are conducted at Business Unit and Sites at scheduled intervals or frequencies appropriate to the assessed level of HSE risk.

20.4 Surveys are conducted to assess Employees' and Contractors' perceptions of HSE.

20.5 Business Unit and Sites conduct Self Assessments against ATP SpA's HSE Management Standards and results are reported to Group Risk.

20.6 Corporate HSEMS audits are scheduled and conducted in accordance with a formal audit process addressing all the requirements of these Standards and specifying the corresponding levels of conformance.

20.7 Corporate HSEMS audits are scheduled using a risk based approach and conducted by multi-disciplinary teams comprised of auditors who are qualified and independent from the Business Unit being audited. Feedback is provided to Site Management and Employees.

20.8 Corrective actions to address non-conformance with these Standards are prepared, executed, tracked and their status regularly reported. Corrective actions must have allocated time for completion and responsibility for each corrective action.

20.9 The effectiveness of the HSEMS and the degree of suitability and implementation of these Standards is reviewed periodically and findings are used to set company HSE KPIs to drive continual improvement.

20.10 These Standards are reviewed at least every two years and revised as required.

20.11 The review of the HSE Management Standards considers audit results, corrective and preventative actions, legislative compliance, prevalence of incidents and other HSE performance records and reports. Business Units' Personnel input to these reviews.

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Standard 20

AUDITS, ASSESSMENT AND REVIEW

Key terms used in the ATP SpA HSE Management System have been capitalised and are defined as follows:

Term	Definition
Activity	In these Standards, an Activity means a task, role, pursuit or condition at a Site or Workplace (including that which is related to the performance of work e.g. use of vehicle supplied by the Employer in the performance of work).
Community	The ATP SpA internal community, including Employees and Contractors, and the external community including host communities, indigenous communities, non-government organisations, governments, business partners, customers, suppliers and other key stakeholders. Under the terminology used in these Standards, 'community' also includes consideration of human rights.
Contractor	An individual, company or other legal entity that carries out work or performs services pursuant to a contract for service. This includes sub-contractors. A person or company engaged to provide labour or skills as an independent Contractor and paid on invoice.
Critical Activity	An Activity or Activities where conduct outside expected performance has the potential to result in a Major Accident Event.
Critical Control	A control designed to mitigate the risks of a Major Accident Event taking place.
Critical Equipment	A piece of equipment or a structure whose failure to perform to design specification has the potential to result in a Major Accident Event.
Critical Procedure	A procedure (or step in a procedure), divergence from which has the potential to result in a Major Accident Event.
Critical System	A system (hardware or software, including human behaviour) whose operation outside expected performance has the potential to result in a Major Accident Event.
Employee	An individual who works for ATP SpA under a contract of employment. People who are engaged through the company's payroll (i.e. subject to PAYG withholding tax and super guarantee arrangements, or PAYE in New Zealand) on a permanent or casual basis.
Employee Assistance Program	A program to provide access to confidential, objective and skilled assistance in solving work and non-work related problems that may impact on work performance or the work situation.

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7. DEFINITIONS

Term	Definition
Environment	Surroundings in which ATP SpA operates, including air, water, land, natural resources, flora, fauna, habitats, ecosystems, biodiversity, humans (including human artefacts, culturally significant sites and social aspects) and their interaction. The Environment in this context extends from within an operation to the global system.
HSE Management Standard	Mandatory at all ATP SpA Sites and operations and forms the basis for the development and application of HSE Management Systems at all levels of ATP SpA.
HSE Management System	Management processes and documentation that collectively provide a systematic framework for ensuring that tasks are performed correctly, consistently and effectively to achieve a specified outcome and to drive continual improvement in HSE performance. A systems approach to management requires: an assessment of what needs to be done; planning to achieve the objective; implementation of the plan and review of performance in meeting the set objectives. A management system also considers Employees and Contractors, and resource and documentation requirements.
KPIs	Key Performance Indicators
Major Accident Event	Any incident with the potential to lead to any of the following: <ul style="list-style-type: none"> • A fatality • Serious environmental effects, including impairment of ecosystem function • Ongoing significant social issues • Significant adverse attention from national media or non-government organisations (NGO), or loss of licence to operate.
Partners	Includes joint venture partners and other stakeholders executing projects or programs of work with ATP SpA, excluding Contractors.
Personnel	People engaged in work for, and on behalf of, ATP SpA, including Employees.
Risk Assessment	The systematic evaluation of the degree of risk posed by an Activity or operation. The process of using the results of risk analysis to rank and/or compare risks against acceptable risk criteria or goals.
Safety Critical Activity	Any Activity that if control is lost could lead to serious injury to people.
Safety Critical Role	Any role where the incumbent has a key responsibility in at least one safety critical system or control.
Term	Definition
Self Assessment	An internal review of systems, procedures, information, practices or facilities carried out by an operation to confirm compliance with regulated or other requirements, to ensure that operating procedures are being followed or to provide assurance to ATP SpA that Standards are being implemented and are effective.
Significant Incident	An incident that has actually resulted in or had the potential to cause significant consequences. For the purpose of reporting, significant incidents are all incidents with actual consequence levels of 4, 5, or 6 and incidents with potential consequence levels of 5 or 6, in accordance with the consequence categories on the ATP SpA Risk Matrix.
Site	In these Standards, Site means a Workplace or a Business Unit for which HSE performance is measured and reported and falls under the clear responsibility of an accountable manager. It may be any place or location (whether on land, in a vessel, vehicle or otherwise) moveable, transient or otherwise at which work is conducted.

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Site Management Supplier	The person or persons with overall control for the management and direction of an operation, Activity, project or venture.
Toolkits	A business entity that provides goods and/or services integral to, and utilised in/for the production of ATP SpA products and services.
Visitor	Procedures, guidelines, checklists, forms and other documents that provide practical assistance in meeting the requirements of the HSE Management Standards and associated directives
Visitor	A person visiting an ATP SpA Site who is not an ATP SpA Employee or Contractor at that Site.

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8. OTHER RELEVANT POLICIES AND PROCEDURES

The HSE Management System is designed to operate within the constraints of all ATP SpA's Policies and Management Systems, including Corporate Governance policies and guidelines, Code of Conduct, Delegated Authorities System, Risk Management Policy and Financial Management System policies and procedures.

Other relevant HSE policies and procedures include the Rehabilitation Policy and Programme, HSE directives, procedures and guidelines that provide support and guidance on HSE matters. Latest copies of these documents are located _____ on _____ Source.

The following external standards were considered in the design and preparation of ATP SpA's HSE Management System:

AS 3806:2006 Compliance programs

AS/NZS ISO 31000 2009 Risk management – Principles and guidelines

AS/NZS 4581:1999 Management system integration – Guidance to business, government and community organisations

AS/NZS 4801:2001 Occupational health and safety management systems – Specification with guidance for use

AS/NZS 4804:2001 Occupational health and safety management systems – General guidelines on principles systems and supporting techniques

AS/NZS ISO 14001:2004 Environmental management systems – Requirements with guidance for use

AS/NZS ISO 14004:2004 Environmental management systems – General guidelines on principles systems and support techniques

OHSAS 18001:1999 Occupational health and safety management systems – Specification

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9. REFERENCE MATERIAL

Our Purpose

We aspire always to lead.

We deliver today's energy needs; and we search and innovate to create tomorrow's energy solutions.

We honour our principles and values, and they are evident in all we do.

We live our commitments to our shareholders, to our customers, to our people, to our communities and to our business partners.

PURPOSE, PRINCIPLES, VALUES AND COMMITMENTS

Our Principles

ATP SpA's principles guide decisions that are right:

- We conduct ourselves and our business with **due care** and in accordance with relevant laws and regulations. We have an overriding duty to ensure the health and safety of our employees, and to minimise the health, safety and environmental impacts on our customers and the communities in which we operate.
- We will **add value** to the resources that come under our control.
- The value we create will be distributed to stakeholders recognising the need to ensure the **sustainability** of our business, and its impact on the environment and the communities in which we operate.
- We encourage **diversity** and expression of ideas and opinions but require **alignment** with the company's commitments, principles and values and the policies established to implement them.
- When faced with choices, we make decisions knowing they will be subject to **scrutiny**. We should be able to demonstrate the soundness of our decisions to all stakeholders.

PURPOSE, PRINCIPLES, VALUES AND COMMITMENTS

Our Values

ATP SpA's values describe behaviours that are good:

- **Caring:** We care about our impact on customers, colleagues, the community, environment and shareholders.
- **Listening:** We listen to the needs of others, knowing that an unfulfilled need creates the best opportunities.
- **Learning:** We constantly learn and implement new and better ways, sharing information and ideas effectively.
- **Delivering:** We deliver on the commitments made in all areas of performance.

Our Commitments

ATP SpA's commitments define the outcomes we strive to achieve. We commit to:

- Deliver market-leading performance for **shareholders** by identifying, developing, operating and growing value-creating businesses.
- Create value for our **customers**, by understanding their needs and delivering relevant and competitive energy solutions to meet those needs both today and into the future.
- Create a rewarding workplace for **our people** by valuing everyone's contribution, encouraging personal development, recognising good performance and fostering equality of opportunity.

 <i>italian engineering company</i>	HSE MANAGEMENT SYSTEM	<i>Ref. tender</i>		HSE-MS
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- Respect the rights and interests of the **communities** in which we operate, by listening to them, understanding and managing the environmental, economic and social impacts of our activities.
- Respect the rights and interests of our **business partners**, by working collaboratively to create valued and rewarding partnerships.

ATP SpA