

GOLDEN RULES OF SAFETY

Explanatory Guidance

PREFACE

The current UGI Golden Rules are based on the original Shell conception which is now over a decade old. While the Shell – designed Golden Rules have served us well, it has been concluded by the Leadership Team & IM/SHEQ department that they need a refresh to better outline the UGI Industrial Management System (IMS) safety philosophy.

The New Golden Rules are:

- **Rule 1: We report all Accidents & Near Misses and we do it promptly.**
We will report all accidents, unsafe acts & near misses within the times required by IM/SHEQ. Further, where required, we will investigate thoroughly to: a) determine root cause b) the best solution(s) to prevent reoccurrence and c) we will share the learnings. This also includes Process Safety based incidents such as overfills & gas-releases and Occupational Safety incidents such as vehicle collisions; slips, trips & falls etc.
- **Rule 2: We use Management of Change to anticipate the effects of every change to our working practices and workplace.**
We will only proceed with changes to equipment, technology, plant & processes when we have completed a recognised Management of Change method that fully addresses the safety & business risks. This may also require supporting risk analysis such as HAZAN/HAZID; HAZOP; Human Reliability Assessment or other recognised business and safety risk control techniques.
- **Rule 3: We apply the principles of sensible, proportionate risk assessment & control to all work we do.**
All our work is subject to Risk Assessment that is reasonable, practicable and efficient. We further control our risks in a suitable and sufficient manner using recognised methods such as Permits to Work, Standard Operating Procedures, Point of Work Risk Assessments and we develop new procedures where required.
- **Rule 4: We take responsibility for the safety of the work we do and always follow the procedures laid down to help us undertake it.**
Personal responsibility is at the heart of our Golden Rules. We recognise that we have moral and legal obligations to work safely so we do not harm ourselves or others by what we do. We follow the company policies & procedures set down to help us to work safely. We take responsibility for the decisions we make and the companies, equipment and products we use or bring into our operations.
- **Rule 5: We never ignore poor safety practice and will always challenge, report and correct it.**
Ignoring someone doing some unsafe is not acceptable, it can potentially harm us and others. If we see this, we will challenge the person and assist them to correct it if possible. We will also report the behaviour to our line management.



INCIDENT REPORTING
We report all accidents and near-misses and we do it promptly.



MANAGEMENT OF CHANGE
We use management of change to anticipate the effects of every change to our working practices and workplace.



RISK ASSESSMENT AND CONTROL
We apply the principles of sensible, proportionate risk assessment and control to all the work we do.



PERSONAL RESPONSIBILITY
We take responsibility for the safety of the work we do and always follow the procedures laid down to help us undertake it.



CHALLENGE UNSAFE BEHAVIOUR
We never ignore poor safety practice and will always challenge, report and correct it.

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INCIDENT REPORTING



MANAGEMENT OF CHANGE



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Golden Rules Pictograms Versions 1 & 2

Golden Rules Breakdown

Rule 1: We report all Accidents & Near Misses to the defined time limits.

We will report all accidents, unsafe acts & near misses within the times required by IM/SHEQ. Further, where required, we will investigate thoroughly to: a) determine root cause b) the best solution(s) to prevent reoccurrence and c) we will share the learnings. This also includes Process Safety based incidents such as overfills & gas-releases and Occupational Safety incidents such as vehicle collisions; slips, trips & falls etc.

All accidents, incidents, unsafe acts & near-misses require reporting to IM/SHEQ. This includes car- related incidents, overfills etc.

The AGSR02 form has been split into 3 separate forms for simplicity and more focused reporting:

- The Safety Report Form (Safety form)
 - The Call-Out / Gas- Safety Form (COGS form)
 - The Process Safety Form (PS form)
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- The Safety Report form is for reporting accident/ near misses to people, plant & equipment, also security and ill-health issues (caused by work) and should be used by everyone.
 - The Call-Out / Gas Safety (COGS) form is for any gas call out or gas release incidents and generally will only be used by Engineering
 - The Process Safety (PS form) is for process safety Incident reporting at our depots and terminals only.

The reporting time scales for various events are defined as follows:

Reporting Deadlines

Report immediately - or as soon as reasonably practicable – by the quickest means including phone and/or email for the following categories/incidents:

- Fatality
- Lost Work Cases (injury likely to involve time off work)
- Medical Treatment Case (hospital/doctor needed)
- Vehicle Rollovers
- Gas Escapes (over 1000 litres or 500 kgs &/or 50kg -> 500kg)
- Vehicle Incidents involving injury
- Overfills (field or depot/terminal)
- Mercaptan release or any other process safety incident

The following incidents must be formally reported (or followed up) via the correct form within 24 Hours:

- Fatality
- Near Miss
- Lost Work Cases (injury likely to involve time off work)
- Medical Treatment Case (hospital/doctor needed)
- Vehicle Rollovers
- Gas Escapes (over 1000 litres or 500 kgs &/or 50kg -> 500kg)
- Vehicle Incidents involving injury
- Vehicle Incidents involving any damage to AvantiGas vehicle or 3rd parties
- Overfills (field or depot/terminal)
- Observations of unsafe acts or unsafe conditions
- Environmental Incidents
- Security Incidents
- Mercaptan release or any other process safety incident

Report within 48 hours:

All other categories/incidents (e.g. call-outs, minor gas escapes, first aid cases)

Between 08:00 and 18:00 (Monday to Friday):

Notify any IM/SHEQ team member by phone - or email SHEQ@avantigas.com. Also notify your Line Manager

At all other times:

For serious or major accidents/incidents follow normal emergency procedures (Notify your Line Management notification and/or respond to lone worker alarm escalation process and/or follow Crisis Management Plan)

The new forms are on the IM/SHEQ pages of the HUB. Please use these and destroy any paper copies of existing forms.

Rule 2: We use Management of Change to anticipate the effects of every change to our working practices and workplace.

We will only proceed with changes to equipment, technology, plant & processes when we have completed a recognised Management of Change method that fully addresses the safety & business risks. This may also require supporting risk analysis such as HAZAN/HAZID; HAZOP; Human Reliability Assessment or other recognised business and safety risk control techniques.

Management of Change (MOC) is a process designed to analyse and highlight potential problems and control measures to changes in established procedure or operations, or during the introduction of new processes, structure, plant, software or equipment etc. It can be helpful to think of it as a 'pre-risk assessment'. What it asks us to do is to think about something before we make a significant change. This can help maintain our safety record and prevent injuries or dangerous events from occurring.

There is a formal MOC process and the relevant documentation can be found on the HUB. It won't always be required, but you should acquaint yourself with the procedure and forms in case you need them. Management of Change is a mind-set, it's thinking about things **before** we do them.

Rule 3: We apply the principles of sensible, proportionate risk assessment & control to all work we do.

All our work is subject to Risk Assessment that is reasonable, practicable and efficient. We further control our risks in a suitable and sufficient manner using recognised methods such as Permits to Work, Standard Operating Procedures, Point of Work Risk Assessments and we develop new procedures where required.

Risk assessment is a structured methodology of determining risks to people, assets, the environment and our company reputation. We look at the risks and then determine what control measures are currently in place. We then assess again to see if any further measures are needed to improve the situation. It can be utilized across many situations you can find in daily work life, from moving an office desk to commissioning a site.

Specialist techniques are available should they be required for more complex assessments.

Rule 4: We take responsibility for the safety of the work we do and always follow the procedures laid down to help us undertake it.

Personal responsibility is at the heart of our Golden Rules. We recognise that we have moral and legal obligations to work safely so we do not harm ourselves or others by what we do. We follow the company policies & procedures set down to help us to work safely. We take responsibility for the decisions we make and the companies, equipment and products we use or bring into our operations.

At AvantiGas, we often have to deal with complex and potentially dangerous situations. It is imperative that we take responsibility for the actions and things that we do whilst at work, regardless of whether we are conducting a 10-year test, or simply changing a lightbulb. UK law specifically requires us to do this.

If we fail to follow the designated company policies and procedures to help us work safely, we put not only ourselves at risk, but also colleagues, work partners and members of the public. If we bring new companies, equipment, substances and products into our work operations, we are responsible for their introduction and their interaction with our environment.

Whenever we perform our work, whether in the field all in an office, we have responsibility to make sure that our actions do not cause harm, either directly or indirectly.

Rule 5: We never ignore poor safety practice and will always challenge, report and correct it.

Ignoring someone doing some unsafe is not acceptable, it can potentially harm us and others. If we see this, we will challenge the person and assist them to correct it if possible. We will also report the behaviour to our line management.

At AvantiGas we have a safety record that we can be proud of and we want to keep it. If you see acts of unsafe behaviour, you should challenge it, correct it and report it, regardless of whether it is a work colleague, work partner or a contractor.

Guidelines and Frequently Asked Questions (FAQs)

Key Messages

- Safety is one of Avanti Gas' core values. The safety of our employees, customers and others is always our priority.
- Having a good Safety Culture is widely recognised as being a key performance indicator for any high-performance company.
- The Golden Rules are based on incidents and experiences in our company and reflect legal and regulatory requirements that apply to Avanti Gas.
- The Golden Rules reinforce those critical areas of our existing IM/SHEQ management system that present a high risk of serious injury or fatality if not followed. Therefore, they **must** be adhered to at all times by everyone.
- Disregard for the Golden Rules will be dealt with by line management and HR in the same manner as any other serious misconduct or breach of any UGI policy or rule.

Questions & Answers

- **Q. Why do we need the Golden Rules?**
 - Rules are used in many aspects of life and work to provide us with clear guidance as to how we should behave and act and what is expected of us. Today, we have many rules and procedures in our business that already do this.
 - The Golden Rules relate to five key areas that we know can lead to accidents or incidents.
 - The Golden Rules exist to provide us with clear guidance on the expectations of UGI around five key areas and to prevent serious injuries to people and potentially damaging near-misses & unsafe conditions.

- **Q. Can I get dismissed for breaking a Golden Rule?**
 - Any violation of a Golden Rule is a serious matter. There are various options for breaking a Golden Rule(s) from extra coaching to dismissal for gross misconduct. Line Managers have been issued guidance to assist in determining the best course of action for dealing with a violation. There should be no difference in our approach between IM/SHEQ and any other serious business issue such as violence and criminal acts, fraud, discrimination, etc.
- **Q. Does this apply to supervisors and managers as well?**
 - Yes. It also applies to our contractors and our work partners.
- **Q. What should I do if a colleague is breaking a Golden Rule?**
 - Stop the work immediately & make the situation safe. Talk to your colleague; it may be that he/she is unaware that they are breaking a Golden Rule. However, you **must** also report the occurrence to a supervisor or manager so that they can take appropriate action.
 - If you feel you cannot approach a supervisor or manager, you should report the breach to IM/SHEQ or Human Resources.
 - Please note, failure to report such an occurrence would be a contravention of Golden Rules (see Golden Rule No.1: Incident Reporting & Golden Rule No.5: Challenging Unsafe Behaviour).
- **Q. Who is responsible for implementing the Golden Rules?**
 - The individual Departments are responsible for implementing the Golden Rules inside their areas so that all people in that department understand the rules, comply with them and understand that consequences will be applied when Golden Rules are broken.
 - A guidance document for Line Managers is available to assist in determining actions from breaches of the Golden Rules.
 - IM/SHEQ will assist with training, investigations and audits / reviews as necessary.
- **Q. Can I get a VC for reporting a breach of a Golden Rule?**
 - No. Reporting a breach of a Golden rule is an absolute requirement (see above) for working within Avanti Gas.

If you need further explanation of the Golden Rules or want to discuss anything around them, please contact IM/SHEQ.