

# HSE CHARTER

## FOR RUBIS ENERGIE AFFILIATED COMPANIES

Each RUBIS ENERGIE affiliate must comply, beyond the regulations in place locally, with the fundamental HSE objectives listed below and detailed in the RUBIS ENERGIE Operations & HSE database available online on the Rubis Team collaborative platform:

- The Group's values, enshrined in the Rubis Code of Ethics, are known and complied with by all staff members.
- Organizational charts and job descriptions are in place and kept up to date; individual objectives are set annually.
- The risks to the health and safety of workers are regularly assessed and the preventive and corrective measures implemented accordingly. Actions such as the following:
  - Establishment of an HSE policy, which defines the main HSE targets,
  - Definition of procedures and safety instructions (outside contractors' operations included),
  - Development and implementation of HSEQ & Operations training plans,
  - Assessment of risks associated with dangerous goods stored and handled,
  - Implementation of preventive maintenance programs,
  - Etc.

are routinely carried out to ensure the safety of goods and people and to enhance staff awareness toward safety.

- Incidents / accidents are recorded, analyzed and reported to the Group HSE & Technical Department so formal feedback documents (Learning From Incidents) can be established and circulated to all affiliates for all noteworthy events, in order to prevent their recurrence.
- Emergency response plans, associated with on-call and crisis management procedures, are put in place; crisis communication training is provided to employees likely to intervene in such cases. Management responsibilities are defined, and delegations of authority are put in place accordingly.
- Transportation activities (road, rail, pipeline or sea) safety KPIs are regularly analyzed as part of continuous improvement. Vessels used in maritime transport meet predefined standards in terms of vetting.
- Best professional practices are implemented in order to ensure greater safety ("Do it safely, or not at all") and protection of the environment (water, soil and atmosphere, limitation of GHG release (such as than CO<sub>2</sub>, VOC, Sulfur, etc.) as well as energy and water consumption).
- A document management system is put in place, in line with the RUBIS ENERGIE Operations & HSE database, if possible according to recognized Quality standards, in order to guarantee, through its implementation, the reliability and safety of operations.
- Aviation procedures meet or exceed JIG standards.

### Specifically for distribution activities :

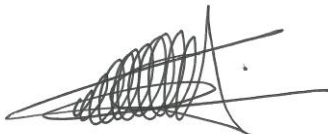
- Operations, safety wise, are defined through formalized procedures and instructions and, whenever possible, within the framework of a Quality certification; they are regularly audited, and the implementation of the proposed recommendations is defined and monitored through action plans. Operations / Safety instructions are made available to customers, in particular an HSE manual for service stations managers.
- Facilities and accessories (in particular cylinders, dispensers and LPG / fuel / bitumen tanks) lent to customers are regularly checked and maintained according to up-to-date specifications, if possible according to recognized Quality standards .

- Service station fuel distribution equipment which could generate ground pollution (tanks and pipelines) are regularly maintained, periodically checked (leak detection tests to be performed at least every 5 years for "single wall" equipment) and progressively replaced by "double wall" technology equipment; fuel stocks are accurately managed in order to be able to detect any loss immediately. Rainwater from the delivery / distribution areas is processed before being released in the environment and quality controls of the effluents are routinely carried out.

Specifically for industrial facilities :

- Terminal operations, safety wise in particular, are defined through formalized procedures and instructions, if possible according to recognized Quality standards. The Terminal Manager's duties and responsibilities are clearly identified.
- Operations safety, with a special focus being given to proper operations of safety devices, is routinely audited and the implementation of the proposed recommendations is defined and monitored through formal action plans.
- Industrial wastewater, black water and rainwater from storage and loading / unloading areas are processed before being released in the environment and quality controls of the effluents are routinely carried out.
- The quantities of hazardous products present in the terminals are controlled and reconciled daily to stay below the maximum authorized thresholds and to immediately detect any loss due to leaks or fraud.
- Security audits are routinely carried out to best fight against the threat of malicious acts.
- Operating licenses and major contracts relating to the use of land or key equipment (pipelines, sea jetties, loading racks, etc.) belonging to third parties are managed in a preventive manner.
- Facilities are operated according to detailed procedures and are designed to avoid any product release in the environment (e.g. presence of watertight retention bunds, presence of high level alarm systems, regular inspection of pipelines and storage tanks, stringent fuel stocks management, etc.)...
- Releases of VOCs, CO<sub>2</sub>, sulfur, etc. into the atmosphere are reduced as much as possible; fuel terminal loading racks are progressively upgraded with bottom loading systems and gasoline tanks are fitted with internal floating screens.
- Technological risk assessments are carried out in specific studies in order to define the required investments with the objective of reducing these risks as much as possible through economically viable solutions.
- Natural hazards (earthquakes, flooding, hurricanes, lightning, etc.) are taken into account in terminal designs and terminal operations whenever relevant.
- Emergency plans are routinely updated and appropriate drills carried out to assess the staff performance and the reliability of safety equipment (fire protection systems in particular). The Management duties and responsibilities, including in-place Delegations of Authority as well as on-call procedures and crisis management procedures are regularly reviewed and updated.
- In the event of an IT system failure, terminals should be able to continue to operate with a reduced level of service (degraded mode of operation) through a back-up system, or manually.
- Management guidelines are set out to avoid any major disputes or frauds.

**RUBIS ENERGIE Technical & HSE Management**



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