

— GAZPROM GERMANIA GMBH

HEALTH, SAFETY, AND SUSTAINABILITY PRINCIPLES

HEALTH, SAFETY, AND SUSTAINABILITY PRINCIPLES

GAZPROM Germania GmbH
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1 —

GROUP POLICY ON HEALTH, SAFETY, AND ENVIRONMENTAL PROTECTION

GAZPROM Germania GmbH is at the helm of an international group of around 50 companies in more than 20 countries in Europe and Asia. Its main business activities include the storage and trading of natural gas and natural gas for transport.

GAZPROM Germania GmbH's management is committed to the following health, safety, and environmental protection (HSE) principles:

HSE is an essential component of providing a safe and reliable supply of natural gas and is therefore key to the financial success of our company. For this reason, we make HSE a part of all our activities and set ourselves ambitious goals in this area.

Before commencing any activity, we determine the dangers and develop tailored solutions to minimize the risk to human life and the environment.

We commit to the sustainable development of the company based on the safe and efficient operation of our facilities and the conservation of the environment and resources.

With our HSE management system, we have set and will continue to improve high standards for facility and workplace safety, health, and environmental protection that apply company-wide. Adherence to these standards is mandatory for all employees and contractors.

We adhere to local laws, international conventions, and industry standards.

We live an open company culture and work to establish an environment that motivates us all to take on personal responsibility.

Everybody who works at GAZPROM Germania GmbH can help realize these guidelines through careful, dedicated action. For this reason, we expect our employees and contractors to observe their own actions and their environments and to openly address unsafe conditions and actions.

HSE. Managing risk safely.

2.1 —

RESPONSIBILITIES AND ADHERENCE TO LEGAL REQUIREMENTS

Health, safety, and environmental protection always take priority over economic aims and are the responsibility of the entire management chain. All persons are responsible for their own health and safety, the health and safety of their employees, and the protection of the environment. The HSE requirements apply to employees and contractors alike.

We design our work processes such that the impact on human life and the environment is as small as possible. Adherence to local laws, international conventions, and industry standards is key to all action we take. All legal requirements applicable to our activities are identified during the planning phase and suitable organizational apparatus established to ensure they are met. Adherence to and up-to-dateness of legal requirements and the allocation of responsibilities are checked internally at regular intervals, areas for potential improvement identified, and improvements implemented.

2.2 —

DETERMINING HAZARDS AND ASSESSING RISK

Before performing any activity, the dangers and risks to human life and the environment and their impacts are identified and assessed. Suitable risk avoidance measures are planned and implemented before the activity is commenced. Where danger cannot be avoided, it must be reduced to an acceptable level.

Technical measures always take priority over organizational or personal protection measures. We use the best available techniques and procedures wherever possible.

2.3 —

ENVIRONMENTAL PROTECTION AND ENERGY EFFICIENCY

We commit to the sustainable development of the company and work to ensure the safe and efficient operation of our facilities along the entire value chain. We record and assess all impacts of our actions on the environment and define measures by which to eliminate and reduce significant impacts on the environment.

Wherever possible, we use efficient technologies and intelligent control systems to help us reduce resource consumption and prevent emissions (eco-efficiency).

2.4 —

GOALS, PROGRAMMES, AND SERVICES

The secure, reliable, and efficient operation of our facilities is essential to supplying our customers with natural gas and the financial success of our company. This requires well-functioning HSE services, of which we keep regular records using defined KPIs.

To ensure that our HSE work continues to improve, we assess the data recorded and set long-term company goals (to be refined by tailored annual programmes that apply to individual company units). The KPIs, goal achievement, and annual programme implementation will be discussed annually by company management and the heads of departments and additional measures by which to improve the performance agreed based on those discussions.

2.5 —

HSE MANAGEMENT SYSTEM

We operate a company-wide HSE management system to better manage our company processes as they relate to HSE and ensure continuous improvement. It describes processes relevant to HSE and defines HSE standards.

The HSE management system is based on the Group HSE Regulation. These are further defined in the HSE Management System Manual, which describes the fundamental organizational structure and processes. Supplementary procedural descriptions define HSE processes, whereby adaptations to local conditions may be undertaken where relevant in the form of work instructions.

Adherence to the HSE management system is mandatory for all employees and contractors. If the contractor in question already has its own comparable HSE management system, a bridging document can be agreed to define how the two HSE management systems are to be used together.

2.6 —

CORPORATE CULTURE

The HSE requirements can only be implemented successfully if all those involved work together and communicate in a manner that is goal-oriented and based on trust and reliability.

That requires a corporate culture marked by responsibility for colleagues and the environment. HSE must be recognized as an integral component of our overall activity and a key prerequisite to the success of our company.

2.7 —

PERSONAL COMMITMENT AND COOPERATION

Whether in the office, on a construction site, or at one of our facilities, we can only achieve our HSE goals by working together. This requires the personal commitment of every individual.

All employees and contractors are responsible for critically observing their environments, addressing unsafe conditions and actions, and reporting potential improvements.

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ENERGY UNITES PEOPLE