

Preventive Safety Observation
Programme (PSO)

Code: **NT.00032.GN-SP**

Version: **4**



The following text is a translation of the original Procedure "Programa de Observación Preventiva de Seguridad (OPS)" (NT.00032.GN-SP), Version 4, in order that the contents should be easily understood by all Gas Natural Fenosa employees. In the event of any discrepancy in interpretation which may arise from the translation, the contents of the original Spanish version currently in force shall prevail for all relevant purposes.

THE DIRECTOR OF PURCHASING, PREVENTION AND GENERAL SERVICES

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Preventive Safety Observation Programme (PSO)

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Preventive Safety Observation Programme (PSO)

1. Purpose

The purpose of this document is to show the minimum requirements on which the Preventive Safety Observation (PSO) Programmes must be based.

This programme endeavours to increase the level of awareness about unsafe behaviours and foster the adoption of safe behaviours on the job by identifying and observing said behaviours and effective communication of the results of such observation to all employees.

2. Scope

It applies to all companies in which Gas Natural Fenosa holds a majority shareholding and to those companies or entities in which Gas Natural Fenosa has operational and/or management responsibility.

3. Reference documents

NG.00002.GN Integrated Management System Manual

4. Definitions

PSO: Preventive Safety Observation

SIG: Integrated Management System

5. Responsibilities

They are indicated throughout the document.

6. Development

6.1. General considerations

Behaviour modification programmes have become popular in the field of safety, because there is evidence that a significant proportion of work accidents are caused by unsafe behaviours (actions).

One fundamental aspect of the programme is that observations are made of behaviours and not of people, meaning that the result of the observation is the recording of whether the observed behaviour is safe or unsafe, but the person or group observed is not identified.

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6.2. Characteristics of the Programme

The main characteristics of the programme are the following:

- Proactive focus.
- Worker participation.
- Observable behaviours.
- Positive consequences
- Gradual consolidation.
- Anonymous observations.
- First class preventive tool.

6.3. Design of the programme.

6.3.1. Areas of activity.

The population, object of observation, will be all workers, both the company's own employees and those of contractors, who perform jobs within the entire scope of Gas Natural Fenosa.

The PSO will be prioritised on the group's most operational activities, although not exclusively.

6.3.2. Observers

Observers will be defined as those workers who conduct field observations, thereby verifying the level of compliance with safe behaviours.

All executives, middle managers and all other workers who have personnel in their charge or who supervise contracted activities will be observers.

These executives and managers are divided into two types of profiles:

- Leaders with operational personnel in their charge.
- Leaders of cross-company functions without operational personnel.

6.3.3. Coordinator of the Programme

The programme coordinator is the person who will be in charge of the statistical processing of the results of the observation (entered into the system by the observer), in charge of follow-up on improvement actions and in charge of preparing a monthly report.

The coordinator of the programme will also be responsible, if necessary, for compiling an indicative schedule of the observations to be made by area and/or

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activity, for ensuring that the scheduled observations are carried out and for resolving any doubts raised by observers.

Every Business will define the persons who conduct the programme coordination functions.

6.3.4. Minimum number of observations to be made

Leaders with operational personnel in their charge:

- Managing Director: one observation per quarter
- Director: one observation every two months
- Business/Country Management Committees: one observation every two months
- All other personnel: one observation every two months

Leaders of cross-company functions:

- All: one observation each year

Each leader may make and document an observation when, in the course of their usual activity, they detect the occasion to make an observation because of the opportunity for dialogue with people, regardless of whether the identified behaviour merits congratulations or needs correction.

6.4. Observation Process

The observation process has the following phases:

Initial:

This phase can be planned or spontaneous. In the case of planned observations, the observer must contact the personnel who are responsible for the activity in order to make the visit or request the pertinent permissions, if necessary. In spontaneous observations, the observer will go by the criterion of opportunity.

Observation:

As a reference guide, the “Inventory of safe behaviours” will be used, which appears in the computer tool provided for this purpose. When unsafe behaviours are noted in an observation, the observer must inform the person or group executing the task.

If the detected situation involves serious or imminent hazards, this indication will be made at the time it is detected. The situation will be corrected immediately and will be appropriately reported. (For example: access to a confined space without an explosimeter, jobs in a ditch without adequate protection when there is a hazard of being buried, etc.)

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Record of the PSO:

The task being observed will be marked in the document called "PSO Form" available in the PSO management application, thereby indicating the task that is being performed and if it's being performed by a contractor.

This information will be uploaded in the application for PSO management.

6.5. Monthly Summary Report

After receiving the forms from each observer, the coordinator will use them to prepare a monthly follow-up report on the PSOs made as part of the business.

This report, which must be standard, will show at least the evolution of the indicators marked for the PSO programme and the type of improvement actions.

6.6. Processing and Dissemination of the Results

The coordinator will be responsible for processing the results of the PSO and for preparing a monthly "PSO Results Report" (including graphs with the percentages of safe behaviours and a specific message related to the monthly results), which will be disseminated completely within the affected area.

The means of dissemination will be the following:

- Publication on PSO bulletin boards, with the content stated by the programme coordinator.
- Direct transmission to the workers of each area by the direct supervisors in short group meetings (Flash PSO).

The various committees of the group will follow up on the results of the PSO Programme.

- Health and Safety Committee
- Safety Sub-committees (Technical, Territorial and Specific)
- Management Committees
- Coordination meetings

6.7. Support material

At least the following support material must be available to apply the programme:

- Minimum outfitting of personal protective equipment: Safety footwear, protective helmet and high-visibility vest. In turn, the protective equipment specifically required by the activity to be observed must be contemplated.

The material will be requested according to the system established in each country.

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6.8. Training of participants

The observers will undergo a training course to become qualified. This training will have a duration of approximately 6 hours (including practical work).

6.9. Indicators

The follow-up indicators of the Preventive Safety Observation (PSO) programme will be the following:

- % of PSOs made with respect to those planned for the month.
- No. of observers with activity in the month/No. of observers planned in the month.
- No. of actions (improvement or correction) undertaken as a consequence of applying the PSOs.
- No. of PSOs in which unsafe behaviours have been observed with respect to the No. of PSOs made.

The PSO coordinator will be in charge of following up on said indicators.

6.10. PSO Form and inventory of safe behaviours

PSO observations will be recorded in the Preventive Safety Observation Form, available in the PSO management application, applicable to all businesses of Gas Natural Fenosa.

The back side of the form includes an “inventory of safe behaviours”, which is a list of the aspects that have to be assessed in each observation.

6.11. Rules for conducting the PSO

A safety dialogue will be initiated, in which workers will be asked questions and positive aspects will be emphasised.

Initially, the form should not be used during the observation. It is advisable to fill in the form afterwards.

No penalty will be applied due to an observed irregularity. Observation is focused on generating awareness.

7. Records and data. Applicable forms

N/A

8. List of Appendices

- NT.00032.GN-SP-AX.01: Components of the Visible Commitment Network

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Appendix 01. Components of the Visible Commitment Network

Sponsor:	José María Almacellas González
Leader:	Francisco García Acosta
Reg. Gas Bus. Member:	Jairo Soto Rey
Reg. Electricity Bus. Member:	Juan José Coiradas Sambade
Generation Member:	Roberto Pilling Gómez
Latam Member:	Ignacio Ochoa Escala
Prevention Member:	Mario Berdoy Muñoz

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