



MAJOR-ACCIDENT PREVENTION POLICY OF PPC S.A.



Contents

1. Introduction – General principles	3
2. Terms and Definitions	3
3. Reference Framework	4
4. Purpose of the Major-Accident-Prevention Policy	5
5. Scope.....	5
6. Management & Compliance with the Policy	5
7. Pillars of the Major-Accident Prevention Policy	6
8. Safety Management System (SMS).....	8
9. Delimitations / Sources	10



1. Introduction – General principles

The prevention of industrial accidents is a key prerequisite for the protection of human life and health, as well as of the environment and is an important commitment set out in the "European Green Deal" and the "EU Action Plan Towards Zero Pollution for Water, Air and Soil".

The Seveso III Directive aims to prevent major-accident hazards involving dangerous substances, as well as to limit the consequences of such accidents for people and the environment. Therefore, it plays a key role in steering the highly industrialised EU towards zero pollution from industrial accidents.

There exist legally binding requirements for all installations subject to the said Directive. One of the most significant provisions introduced is the **Major-Accident Prevention Policy (MAPP)**, which aims at clearly defining the obligations of the operator by drawing up the relevant Major-Accident Prevention policy report/document. The Major-Accident Prevention Policy has an important role in creating the appropriate climate for the organisation to become familiar with the potential for a major accident and the correct approach/action within the establishment to avoid major accidents.

PPC S.A., demonstrating a strong sense of responsibility towards people and the environment and recognising the possibility of a Major Industrial Accident (MIA) occurring in its establishments that fall within the scope of the Seveso III Directive, seeks in a systematic and organised manner to prevent incidents that will cause harm to people or the environment and to continuously improve industrial safety, achieving a high level of protection for employees, visitors, contractors, suppliers and the local community, as well as the environmental performance of its establishments.

2. Terms and Definitions

Establishment: the whole location under the control of an operator where hazardous substances are present in one or more installations, including common or related infrastructure or activities. Establishments falling within the scope of the Seveso III Directive are classified either as lower- or upper-tier establishments.

Presence of dangerous substances: the actual or anticipated presence of dangerous substances in the establishment or of dangerous substances that could reasonably be expected to be generated during loss of control of the production process, including storage activities, in any installation within the establishment, in quantities equal to or exceeding the qualifying quantities set out in the Seveso III Directive.



Major Industrial Accident (MIA): A major accident is an occurrence, such as a major emission, fire or explosion resulting from uncontrolled developments in the course of the operation of any establishment covered by the Seveso III Directive, leading to serious danger to human health or the environment, immediate or delayed, inside or outside the establishment, and involving one or more dangerous substances.

3. Reference Framework

The JMD No 172058 (OG vol. 8 issue No 354/17.2.2016) transposes Directive 2012/18/EU (Seveso III) into the Greek legislation. According to Article 7 thereof, it is provided that the operator of an establishment shall obligatorily prepare a Report which shall outline the relevant Major-Accident Prevention Policy (MAPP), as well as the conditions and methods for ensuring its correct implementation.

The Corporate Risk Management Framework (CRMF) of PPC S.A. defines a risk management system, in which responsibility for managing and monitoring risks lies with all organisational levels of the Company (Board of Directors, CEO and all executives and employees), based on and within which the Company identifies, assesses, manages and monitors risks and uncertainties in the pursuit of its strategic and business objectives. The CRMF provides for the development of Response Plans, i.e. a plan of actions to manage each material risk, specifying the ways by which the Company addresses such risk.

The Environmental Policy of PPC SA, binds the Company to environmental protection, pollution prevention, sustainable use of resources, protection of biodiversity and ecosystems, etc.

The PPC Group's Sustainable Development Policy, constitutes the Group's basic framework of commitments in the context of Sustainable Development, aiming at continuously striving to create shared value for the Society, the Company and Stakeholders, with the least possible impact on the environment.

The Occupational Health and Safety Policy of PPC S.A., aims to create and maintain a healthy and safe work environment for employees, partners, customers and visitors.

The Major-Accident Prevention Policy (MAPP) falls within the Company's Sustainable Development Policy and in particular within the Occupational Health and Safety Policy and the Environmental Policy and serves the objectives of the Corporate Risk Management Framework (CRMF).



4. Purpose of the Major-Accident-Prevention Policy

The Major-Accident Prevention Policy (MAPP) shall bind the Company and shall be designed to ensure a high level of protection for both human health and the environment and shall be proportionate to the major-accident hazards.

These objectives are of primary importance for PPC S.A. and are derived from the Environmental Policy, the Sustainable Development Policy and the Occupational Health and Safety Policy of the Company.

The Major-Accident Prevention Policy (MAPP) is established, implemented and kept up to date in order to provide the framework for continuously improving the major-accident hazard control and the assurance of a high level of protection.

5. Scope

The present Policy shall apply to the Company's establishments that fall within the scope of the Seveso III Directive, including contracting and subcontracting works carried out within these establishments. To this effect, the Company is committed to cooperating with consortia, suppliers and other third parties that adhere to the principles of this Policy.

This Policy is binding on (i) Board members, (ii) persons discharging managerial duties, and (iii) all other Company's personnel, including the relevant contracted personnel.

6. Management & Compliance with the Policy

The Health, Safety & Environment Group Function is responsible for the drawing up and implementation of the said Policy, as well as for its revision, where required. To this end, it cooperates with the Production Operations Division, the establishments falling within the scope of the Seveso III Directive and the Production Licensing Department.

The Board of Directors and the executives of the Company have been committed to contribute to the endeavour of environmental protection and industrial safety, promoting the know-how, raising awareness and making decisions to support individual actions for the continuous improvement of the control of major-accident hazards and the assurance of a high level of protection.

The achievement of the objectives of the Major-Accident Prevention Policy is recognised by the Management and all employees as a prerequisite for the safe operation of the establishments falling within the scope of the Seveso III Directive.



The Company's Management plays a leading role and demonstrates its commitment to the protection of human health and safety and of the environment, by:

- ❖ Approving the MAPP of the Company,
- ❖ Ensuring that the Company's strategy is in line with the MAPP,
- ❖ Training, motivating, guiding and supporting personnel so as to meet the objectives of the present policy,
- ❖ Promoting continuous improvement,
- ❖ Providing sufficient and appropriate resources (the necessary human and material resources) to achieve the objectives of this Policy.

All employees of the Company, including relevant contracted personnel, shall have the obligation to actively contribute to maintaining the regulatory requirements of the applicable relevant legislation, as well as to comply with the respective rules as laid down in this Policy.

Violation of the Policy may result in sanctions as stipulated in the applicable statutory framework.

Amendments to this Policy shall be approved by the Board of Directors of the Company, upon the recommendation of the Competent Services and the Health, Safety & Environment Group Function.

7. Pillars of the Major-Accident Prevention Policy

PPC S.A., in its pursuit of achieving sustainable and balanced development within a competitive environment, follows an approach of adhering to specific principles, prioritising objectives and promoting choices across all its activities for the protection of health, safety and the environment.

In this context, it acknowledges its obligation towards employees in establishments falling within the scope of the Seveso III Directive, contractors, visitors, the local community, the natural and built environment, to reduce the risks associated with a major industrial accident to the lowest possible tier.

The Company, in order to respond, shall establish, implement and keep up-to-date, for its establishments falling within the scope of the Seveso III Directive, a specialised Safety Management System (SMS), compatible with the size and particularities of each establishment, which shall include regulations on the prevention of major accidents and shall be based on the corresponding Occupational Health and Safety Management System (OHSMS) and Environmental Management System (EMS).

For the implementation of the above, the Management of PPC S.A. is committed to:



- Implement the applicable National and EU legislation on the management of risks arising from large-scale industrial accidents (Seveso Directive and harmonisation of Greek legislation) and, in general, on health and safety at work, fire protection and environmental protection.
- Maintain the safety standards provided by the Seveso Directive at the stage of design - implementation of new building establishments and production processes.
- Implement an appropriate organisation and management system and high standards for the operation of establishments falling within the scope of Seveso Directive III, adopting an Occupational Health and Safety Management System (OHSMS) in line with the requirements of the international standard ISO 45001:2018, as well as an Environmental Management System (EMS) in line with the requirements of the international standard ISO 14001:2015.
- Design a risk reduction strategy through the prevention, identification, and elimination of hazardous conditions, as well as the prevention of the occurrence of undesirable events and the mitigation of incidents that could lead to Major Industrial Accidents (MIA).
- Investigate any accidents in the facilities falling within the scope of the Seveso III Directive, incidents that could result in an accident, as well as cases of non-compliance of the implemented OHSMS and EMS, in order to promote the necessary corrective actions and monitor their effectiveness in eliminating the causes of the accidents/incidents/non-compliance.
- Cooperate with all the competent bodies of the State and the local community on issues of facility and equipment safety, environmental protection, hygiene and safety of employees.
- Raise awareness and foster collaboration between employees and external partners with the company's management on matters concerning safety and the environment, acknowledging that the active participation of all employees is essential for the successful implementation of the MAPP.
- Inform and train personnel of facilities falling within the scope of the Seveso III Directive on the hazards and the risk prevention measures they should apply, as well as on the actions they should take in the event of an accident. All employees have access to information related to safety and the Safety Data Sheets of the substances used in these establishments, while facility-specific Internal Emergency Plans (IEPs) have been developed, with provisions for regular personnel drills to ensure their effective implementation.
- Inform the employees of third party companies (contractors, suppliers) and visitors entering Company's facilities that fall within the scope of the Seveso



III Directive about the MAPP, the risks, the preventive safety measures to be applied and the appropriate actions to be taken in case of accident; moreover actions are taken to ensure compliance with the above.

- Provide all the required resources (the necessary human and material resources) to achieve the goals of the present Policy.

All the employees and partners of PPC S.A. have the responsibility to comply with the principles of the protection of Occupational Health and Safety, the Environment, as well as the requirements of Sustainable Development.

The Major-Accident Prevention Policy binds all employees of the Company, is available to the public and is updated/amended on a regular basis, in order to further enhance the safety level of the Company's facilities.

8. Safety Management System (SMS)

The Safety Management System (SMS), which includes regulations for the prevention of major accidents, is based on the Occupational Health and Safety System (OHSMS) and the Environmental Management System (EMS) and addresses the following issues:

- organisation and personnel**— roles and responsibilities of the personnel participating in the major accidents management at all levels of the organisation, as well as the measures to develop awareness of the need for continuous improvement. Determination of the training needs of that personnel and provision of such training. Participation of employees and contracted personnel employed in the facilities and having a key role in terms of safety.
- identification and evaluation of major hazards** — adoption and application of the procedures resulting from the systematic determination of major hazards arising from normal and abnormal operation of establishments falling within the scope of Seveso III Directive, including, where applicable, subcontracted activities, and assessment of their likelihood and severity. The systematic identification of major hazards and the associated impacts arising from normal and abnormal operation shall be carried out, for upper-tier establishments under Seveso, by means of specific studies.
- operational control** — adoption and implementation of procedures and instructions for safe operation, including maintenance, installation, processes and equipment and for the management of alarms and temporary outages, use of available information on best monitoring and control practices to reduce the risk of system failure, management



and control of the risks associated with the ageing of the equipment installed in the establishment and with corrosion, establishment equipment list, strategy and methodology for monitoring and controlling equipment condition, appropriate follow-up actions and any necessary response measures.

- iv) **management of change** – adoption and implementation of procedures for planning changes to existing establishments, processes or storage facilities, or for designing new establishments, processes or storage facilities. In the event of modifications to establishments or processes, the risks, their impacts and the protective measures against such risks shall be reassessed and, in the case of upper-tier establishments under Seveso, the relevant specific studies shall be revised.
- v) **planning for emergencies** – adoption and implementation of procedures to identify foreseeable emergency situations by systematic analysis for the preparation, testing and review of Emergency Plans (EP) to address such situations and provide specific training to involved personnel. This training concerns all personnel working in the establishment, including relevant contracted personnel.
- vi) **monitoring performance** – adoption and implementation of procedures for the ongoing assessment of compliance with the objectives set by the Company through the MAPP and the safety management system, as well as of mechanisms for investigating and taking corrective action in case of non-compliance. The procedures shall cover the operator's system for reporting major accidents or 'near misses', particularly those involving failure of protective measures as well as their investigation and follow-up on the basis of lessons learnt. The procedures could also include performance indicators such as safety performance indicators (SPIs) and/or other relevant indicators.
- vii) **audit and review** – adoption and implementation of procedures for periodic systematic assessment of the MAPP and the effectiveness and suitability of the safety management system; documented review of performance of the policy and safety management system and its updating by senior management, including consideration and incorporation of necessary changes indicated by the audit and review.



9. Delimitations / Sources

The Major-Accident Prevention Policy is a key pillar of PPC's Environmental and Occupational Health and Safety Policies.

In developing this Policy the following were taken into account:

1. The Directive 2012/18/EU (Seveso III), on the "Control of major-accident hazards involving dangerous substances".
2. The Joint Ministerial Decision 172058 (Official Gazette No. 354/B/17-2-2016), which transposes Directive 2012/18/EU, known as Seveso III, into the Greek legislation.
3. European Commission, Joint Research Centre, Guidelines on a major-accident prevention policy and safety management system, as required by Council Directive 96/82/EC (Seveso II), Publications Office, 1998.
4. Law No. 3850: Ratification of the Code of Laws on health and safety at work.
5. The standard ISO 45001:2018: Occupational Health and Safety Management System.
6. The standard ISO 14001:2015: Environmental Management Systems
7. The "European Green Deal" [COM (2019) 640 final of 11.12.2019].
8. The Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Action Plan towards Zero Pollution for Water, Air and Soil [COM(2021) 400 final of 12.5.2021].
9. The Directive 2004/35/EC on environmental liability with regard to the prevention and remedying of environmental damage.
10. D. Xypolia (2019). *The course of evolution in risk management – from Seveso I to Seveso III*. Postgraduate Diploma Thesis, National and Kapodistrian University of Athens, Issue N. 2019150.