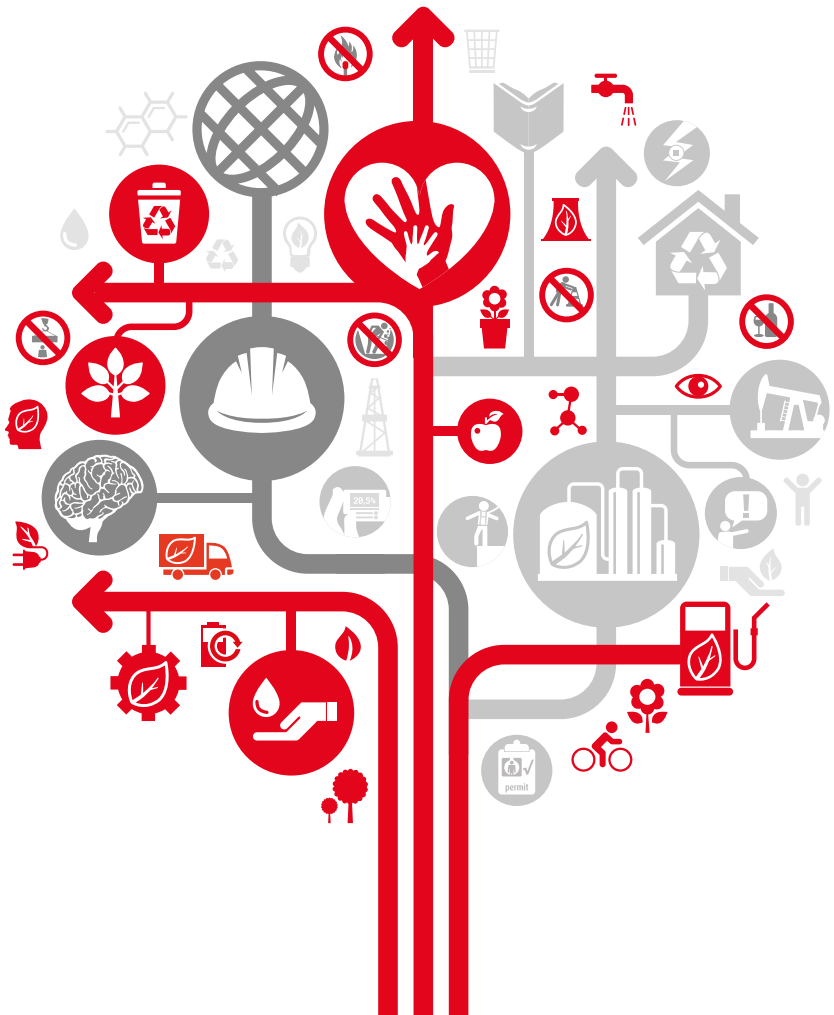
HEALTH, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM



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This publication is designed to provide user-friendly solution in regard to the subject matter covered.

MOLGROUP

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FOREWORD

September 2019

Dear Colleagues,

At MOL Group, we work in many different places and do different jobs, but we all share four main values: people, customers, ownership and agility. These values are just as important at our sites as they are in our offices or at any of our service stations. These are our guiding lights, which lead us to make the right decisions, support us in our everyday work. Health, safety and environment protection principles are integral parts of our values, and therefore also define our operations.

MOL Group is committed to acting responsibly and taking always into account the health, safety, environmental and social impact of our business. As we operate in a hazardous environment on a daily basis, it is essential that we recognize and manage all risks related to our operations responsibly and proactively.

Preventing accidents, protecting our employees, contractors, and reducing our environmental footprint are the responsibilities of all in MOL Group. To meet these expectations we need committed, competent and capable workforce working according to clearly defined policies and principles.

By defining accountabilities in HSE, this handbook enables all leaders to create and maintain an ownership culture, fostering the implementation of HSE principles and guidelines across the organization. We expect you to keep in mind the HSE principles defined in this handbook and apply them in our daily operations in order to avoid any HSE incident, having negative impact on people, environment, asset and/or reputation of MOL Group.

Thank you for your continuous support and commitment, contributing to the success of our 2030 Enter Tomorrow Strategy.

József Molnár
Group CEO

Tamás Szakál
Group SD&HSE VP

HSE AND SOCIAL IMPACT POLICY

We are committed to

- acting responsibly on the health, safety, environmental (HSE) and social impact of our activities as part of day-to-day business
- improving asset integrity and preventing incidents of every type, whilst maintaining a high standard of emergency response
- reducing our environmental footprint, protecting natural values and supporting international efforts that address climate-change-related risks
- making a positive impact while eliminating negative impacts on the communities in which we operate, and on society in general
- promoting a culture in which all MOL Group employees share these commitments

To achieve this MOL Group companies will

- comply with legal requirements and MOL Group standards which follow industry best practices
- control and minimize the HSE and social risks and impacts of our operations, products and services
- protect and strive to improve the overall health and safety of all our employees, contractors and customers at all times
- ensure that contractors are properly qualified and educated in line with our standards, and that they conduct themselves accordingly
- appraise and reward accordingly employee and contractor behavior
- continuously measure, evaluate and improve our HSE and social performance and communicate it openly to stakeholders

All of our employees and contractors have a responsibility to maintain high HSE standards and management must take a leadership role in this. We also aim to promote this policy in non-operated joint ventures.

WE SHOULD ALL RETURN HOME SAFELY AFTER OUR WORKING DAY!

January 1st, 2017

MOLGROUP
THE ENERGY OF POSITIVE CHANGE

Zsolt Hernádi
Chairman and CEO

József Molnár
GCEO

INTRODUCTION

As we operate in a hazardous environment, MOL Group relies heavily on an effective and sustainable Health, Safety and Environment Management System ("HSE MS"). The main goal of this Management System is to define the Group-level Health, Safety and Environment, as well as Community Impact requirements to support MOL Group's strategic business objectives, to ensure a strong foundation in the context of day-to-day business.

On the road towards improved efficiency and increased transparency, we have introduced improvements in the framework since the last handbook edition in 2014. This refreshed HSE MS manual provides for shorter, clearer and more streamlined requirements with which all MOL Group colleagues must comply. The Management System has been aligned with the new standards requirement of ISO 14001:2015 and ISO 45001:2018 and so it supports external certification authorities as well.

The provisions of this management system are mandatory and binding for all affected employees for all types of operations and projects. The management system is part of MOL Group's regulatory system in form of a Process Description. In addition to its general principles, detailed requirements are regulated in appendices and process descriptions. The management system requirements (along with HSE legal compliance and regulatory requirements) are implemented through local regulations embedding HSE principles into operational activities.

From the date of effect, 14 May 2018, the provisions of this Group Principle are mandatory and binding for all affected employees for all types of operations and projects. Details of this GP (along with HSE legal compliance issues and regulatory requirements) are implemented in local regulations embedding HSE principles into operational activities.

While the accountability to implement the MOL Group HSE MS commonly lies with the Group SD&HSE Vice President, local CEOs and local SD&HSE managers, please remember that all employees, as well as contractors have a responsibility to maintain high HSE standards.

Enabling our leaders and colleagues to embed HSE into our operations and our corporate culture, as well as to increase HSE awareness will be key to our success in achieving our business targets. Therefore, in support of the updated HSE MS, the refreshed HSE Toolbox (containing best practices, templates and compliance checklists), and more information is available on a new internal website (reachable via internal networks).

Type
HSEMS
into your browser
to find out more.

HSE MS AT A GLANCE

Element 1: Leadership, Commitment & Accountability

Management, workforce and contractors understand their accountabilities aligned with job responsibilities, authority levels and performance objectives, and they demonstrate leadership and commitment to the Group-level HSE and Social Impact Policy through visible and effective HSE management.

Element 2: Risk & Change Management

Systems are in place to identify, assess, manage, regularly review and document HSE-related hazards and risks associated with MOL Group activities to prevent or reduce the likelihood and/or consequences of incidents. Planned and unplanned changes to MOL Group activities are identified and properly managed from a risk perspective.

Element 3: Competence, Training & Behaviour

Employees, contractors and third parties are aware of relevant HSE requirements, hazards, risks and controls, and are competent at conducting their activities and behave responsibly. Competencies are regularly assessed.

Element 4: Contractor Management

Contractors are assessed for their capabilities and competencies and selected to perform work for / on behalf of MOL Group where they are monitored to ensure their HSE performance is in alignment with MOL Group requirements.

Element 5: Design & Construction

The assessment and management of process and HSE risks are an integral part of project design and construction, enabling sound HSE performance throughout the planning, construction and commissioning of facilities.

Element 6: Safe Operation & Maintenance

Maintain operational reliability and integrity throughout the whole lifecycle of our assets by use of clearly defined and documented operational and structured maintenance and inspection programs. This requires effective procedures, reliable safety-critical equipment, and adequate and competent human resources who consistently execute these procedures and practices while protecting the health of employees, providing adequate medical services, and supporting healthy lifestyles.

Element 7: Environmental Stewardship

Our environmental footprint is reduced, natural values are protected, and climate-change-related risks are addressed. Environmental issues are addressed and controlled, consistent with policy, regulatory requirements and business plans. Environmental performance (including emissions, discharges and wastes) is tracked and stewarded to meet performance goals.

Element 8: Information & Documentation

All the information required to ensure accuracy and consistency when applying risk controls is documented and systematically maintained. The HSE impacts of MOL Group's products and services are assessed, managed and communicated to customers and users to enable their responsible use. The introduction of new products/ substances into manufacturing or operational processes is controlled.

Element 9: Stakeholder & Community Relations

Open, proactive and effective HSE communication and consultation is maintained with stakeholders regarding the HSE aspects of all of our business activities.

Element 10: Incident Management

Systems are in place to ensure that all HSE incidents are reported, recorded, investigated and analysed in a timely manner to prevent recurrence and improve performance. Corrective and preventive actions are undertaken, its effectiveness is evaluated and learning outcomes are shared.

Element 11: Emergency Preparedness & Response

Plans, procedures and resources are in place to effectively respond to emergency situations, to protect people/employees, the environment (including the workplace) and the public, and to preserve the company's assets and reputation.

Element 12: Assurance, Monitoring & Improvement

HSE performance and systems are monitored, audited and reviewed to identify trends, measure progress, assess compliance and drive continuous improvement. HSE Planning is an integral part of business planning with strategic objectives, goals and annual targets to drive performance improvement.

ELEMENT 1
LEADERSHIP, COMMITMENT & ACCOUNTABILITY

Management, workforce and contractors understand their accountabilities aligned with job responsibilities, authority levels and performance objectives, and they demonstrate leadership and commitment to the Group-level HSE and Social Impact Policy through visible and effective HSE management.

1. All individuals in MOL Group are personally responsible for supporting HSE goals.
2. Leaders are committed advocates and owners of the HSE Management System, with no compromise on its implementation and execution.
3. Leaders demonstrate integrity, communicate openly, are role models and foster an environment where people openly provide feedback.
4. Leaders are pro-actively involved and visibly contributing to the risk management, implementation and continuous improvement of processes and systems.
5. Leaders support a strong HSE culture, establish HSE strategy, strategic objectives and action plans, and provide clear direction to guide the organisation in sustaining responsible operating practices.
6. Systems for HSE management are established and sustained throughout the organisation.
7. Roles and responsibilities are clearly defined; authorities and accountabilities are assigned and exercised.
8. Leaders are fully aware of and demonstrate visible leadership and proactive commitment towards HSE excellence through:
    a) setting a personal example that can be followed;
    b) communicating HSE requirements to employees clearly;
    c) empowering individuals and teams to fulfil their HSE responsibilities;
    d) valuing competency, recognizing and utilizing expertise;
    e) open, transparent and effective communication;
    f) discussing and reviewing progress against HSE targets;
    g) demonstrating personal participation in HSE initiatives;
    h) recognising good practice;
    i) applying appropriate rewards and consequence management; and
    j) ensuring regular personal presence on site.
9. Leaders are committed to ensuring an organizational culture that enables safe, reliable, responsible operations and allows for continuous improvement.
10. Leaders integrate HSE targets into their business targets as well as personal actions into business and personal performance evaluation systems and personal action plans of their direct subordinates.
11. Employees are committed to undertaking activities in accordance with company policies, standards and objectives, and in compliance with external requirements.
12. Leaders engage in clear, two-way communication with employees, contractors and third parties about HSE issues.
13. Employees, contractors and customers are aware of the proper HSE behaviour expected from them, and the consequences of inappropriate conduct.
14. Systems are in place to recognize, reinforce and reward HSE performance, innovation, initiatives and desired behaviour.
15. Commitment is made to learning from internal and external sources through processes that continuously reduce risk and improve performance.

ELEMENT 2
RISK & CHANGE MANAGEMENT

Systems are in place to identify, assess, manage, regularly review and document HSE-related hazards and risks associated with MOL Group activities to prevent or reduce the likelihood and/or consequences of incidents. Planned and unplanned changes to MOL Group activities are identified and properly managed from a risk perspective.

1. A company-wide risk assessment system is in place to identify, assess, manage, regularly review and document hazards and risks related to operations.
2. Risk assessment is conducted by competent personnel with appropriate knowledge and experience. The methodology used for risk assessment is selected in accordance with the complexity of the assessed activities/workplaces.
3. Identified risks, preventive, control and mitigation measures are documented and a tracking system is in place that facilitates regular reviews to ensure that risks are properly managed. Risk mitigation measures follow the hierarchy of elimination, substitution, engineering control, administrative control and personal protective equipment.
4. A management-of-change process is in place to assess, control and manage all critical changes to organization/personnel, technologies, facilities and processes. All changes in operations, processes and activities are accordingly re-assessed from a risk perspective. Risk assessments related to changes are subject to the same rigorous review that is applied to new processes and activities.
5. Identified risks, preventive, control and mitigation measures are communicated to all relevant employees and affected parties.

The detailed requirements related to risk and change management are regulated in Appendix 3 of this Process Description. Please type **HSEMS** into your browser to see the latest version of the Appendix.

ELEMENT 3
COMPETENCE, TRAINING & BEHAVIOUR

Employees, contractors and third parties are aware of relevant HSE requirements, hazards, risks and controls, and are competent at conducting their activities and behave responsibly. Competencies are regularly assessed.

1. Recruitment, selection and placement processes are in place ensuring that personnel are qualified, competent and are physically and mentally able to meet job requirements.
2. The legally required HSE qualifications are obtained by individuals in specific jobs. HSE and Process Safety Critical Jobs and relevant competencies, including training needs, are determined and related criteria are included in job descriptions.
3. New hires are trained about HSE rules relevant to the given positions before starting work individually. When returning to work after more than 1 year off work, employees are regarded as new hires and trained accordingly.
4. Employee, contractor/supplier and visitor HSE and process safety competencies and training needs are identified, documented and periodically reviewed. Written procedures exist to govern HSE Competency Assessments and Training procedures at company level.
5. Contractors/Suppliers working permanently or temporarily on MOL Group sites are adequately trained. Visitors and others not permanently working for MOL Group are informed about basic local HSE rules (before entering sites). HSE Leadership training is obligatory for all leaders who manage teams.
6. Following any serious incidents (Severity 3 or above and HiPo), the affected department leader(s) undertake additional training about the lessons to be learnt to prevent recurrence.
7. A culture is maintained where behaviour-based processes for reducing the risk of incidents, including personnel safety, process safety and environmental considerations, are in place. It is expected that:
    a) employees and contractors consistently recognize and proactively mitigate operational, procedural, and physical hazards;
    b) employees and contractors proactively and routinely identify and eliminate their at-risk behaviours and those of their co-workers;
    c) everyone understands their responsibility to “Stop and Intervene” and is motivated to apply Stop Work Authority during any activity in which risk is not adequately controlled or refuses to work in circumstances that may cause HSE harm;
    d) HSE near-misses, unsafe acts and unsafe conditions are reported and mitigated, and relevant learnings are shared.

The detailed requirements related to competence, training and behaviour are regulated in Appendix 4 of this Process Description. Please type **HSEMS** into your browser to see the latest version of the Appendix.

ELEMENT 4
CONTRACTOR MANAGEMENT

Contractors are assessed for their capabilities and competencies and selected to perform work for/on behalf of MOL Group where they are monitored to ensure their HSE performance is in alignment with MOL Group requirements.

1. Hazards and risks associated with working environment and contractor activities are identified, assessed, communicated and managed throughout the procurement process and the entire duration of contracts; the HSE risk level of contractual work is defined before any tendering process.
2. Contractors are pre-screened and/or pre-qualified, depending on contract risk category.
3. Interfaces between contract owner/site owner and contractors are identified and managed.
4. Area owners are responsible for ensuring a safe working environment for contractors (e.g. energy isolation).
5. It is ensured that Contractors are in control of their own activities; depending on the risk level, regular on-site supervision is provided.
6. Our contractors are treated equally to own staff.
7. The principles that support the application of progressive disciplinary/consequences are followed in the case of HSE rule violations. Contractors are encouraged (e.g.: using clear requirements, a bonus/malus system) to report unsafe acts, conditions, near-misses and HSE incidents. The performance of key suppliers who undertake HSE-critical activities is monitored using performance indicators agreed with the supplier.
8. A system for the post-evaluation of the HSE performance of Contractors involved in medium and/or high risk category contracts is in place.
9. Operations assess the opportunity to support key suppliers who perform high-HSE risk work to improve their HSE culture, processes and awareness through a positive recognition system.

The detailed requirements related to contractor management are regulated in Appendix 5 of this Process Description. Please type **HSEMS** into your browser to see the latest version of the Appendix.

ELEMENT 5
DESIGN & CONSTRUCTION

The assessment and management of process and HSE risks are an integral part of project design and construction, enabling sound HSE performance throughout the planning, construction and commissioning of facilities.

1. Criteria, specifications and standards for the design, construction/selection, commissioning and modification of assets and their associated facilities, equipment and materials are defined to address risks and verify conformance throughout their lifecycle.
2. For all major projects (new activities, facility developments and/or significant modification of existing operations) environmental and social features are assessed via Environmental and Social Impact Assessments (ESIA) in the required depth.
3. Review processes are designed to ensure that HSE risks and related considerations are effectively identified, addressed and documented.
4. Operational, maintenance, process safety and HSE experts are involved early in the project/design phase as team members. All available experience and lessons learnt from previous projects and operations are integrated at an early stage.
5. A commissioning plan that incorporates HSE risk management and defines responsibilities and competencies is documented and approved. The plan ensures that the facility, plant and equipment conform to the required standards for start-up and operability.
6. Besides all commissioning requirements, a Pre Start-up Safety Review (PSSR) is conducted and documented to confirm that the facility/technology is safe to start-up.
7. Over the asset lifecycle, all records/documents pertaining to design, equipment documentation (as built), technology and HSE risk assessment, quality assurance/control, testing and inspection, change and PSSR issues are retained.

ELEMENT 6
SAFE OPERATION & MAINTENANCE

Maintain operational reliability and integrity throughout the whole lifecycle of our assets by use of clearly defined and documented operational and structured maintenance and inspection programs. This requires effective procedures, reliable safety-critical equipment, and adequate and competent human resources who consistently execute these procedures and practices while protecting the health of employees, providing adequate medical services, and supporting healthy lifestyles.

1. Comprehensive health and safety programs and safe systems for operational, maintenance and inspection work are established, implemented and maintained with consideration of Human Factors to ensure that all health and safety related risks are adequately managed; additionally, assets, facilities and equipment are operated within their defined design and operating limits at all times. This requirement is communicated to all staff that operate, maintain, inspect and manage them.
2. There are processes for maintaining, replacing, testing, inspecting, calibrating, certifying and verifying the performance of assets, facilities and equipment. These activities are performed at frequencies appropriate to the level of risk, and deviations from specified criteria are managed.
3. Safety-critical operational processes and activities are identified and executed according to documented regulations to ensure appropriate control and safe operation. Safety-critical equipment is identified and tested and undergoes preventive maintenance.
4. A permit-to-work process is established that incorporates checks and authorizations that are consistent with mechanical and operational risks to ensure that hazardous and non-routine work is assessed, planned, authorized and carried out in a way that ensures the health and safety of the employees and contractors involved, as well as others who may be affected.
5. A hazardous energy control and isolation process is established that ensures the health and safety of employees and contractors involved, and others who may be affected.
6. Systems are established, documented and maintained to ensure the operational readiness and integrity of systems before commencing work. Processes are in place to prepare for activities and to confirm that interfaces/handovers are established.
7. Procedures are implemented for managing the temporary disarming, deactivation or unavailability of critical alarm, control, shutdown, security and emergency response equipment and the reactivation of such devices in a timely manner.
8. An appropriate fire prevention system is operated and maintained to prevent circumstances evolving that may cause fires or explosions in operational areas.
9. Processes are implemented to prioritize operational, maintenance and inspection activities and to identify critical - including new and non-routine - tasks that require specific controls and competencies.
10. Processes are implemented to report and prioritize identified deficiencies and track the actions taken to resolve these deficiencies.
11. Assets are operated, inspected and maintained to achieve and sustain robust standards of integrity and performance throughout their lifecycle.
12. Processes are implemented to identify the necessary spares, support and testing equipment for critical structures, equipment and protection devices, and to ensure their availability when needed. A system is implemented to monitor, report and manage maintenance, inspection, testing and monitoring backlogs.
13. Procedures are implemented for the calibration and control of measuring and testing equipment and control systems, including the bump-testing of personal gas monitor devices.
14. Mechanical integrity programs are in place and stewarded to ensure the testing, inspection, and maintenance of equipment occurs.
15. Quality-assurance processes are in place, ensuring that facilities and materials that are received meet the designated specifications.
16. The long-term shutdown or abandonment of facilities is properly planned and managed.
17. A decommissioning plan is established prior to decommissioning, and its appropriate control/management is ensured.
18. Appropriate controls are established and implemented to prevent road accidents in line with road safety principles. Truck drivers' safety fundamentals related to heavy vehicle transportation are followed.
19. The transportation of dangerous goods (HAZMAT) ensured or contracted by MOL Group member companies is in line with MOL Group best practices and national and/or international standards related to the carriage of dangerous goods (e.g. ADR, ADN, RID, IMDG Code, IATA DGR, etc.). Dangerous goods transportation Safety Advisors are appointed with responsibilities and accountabilities for all relevant transport modes.
20. Own staff as well as contractors follow life-saving and safe operating rules and exercise safe behaviour, as well as safe working practices.
21. Management ensures a process is implemented to provide personnel with appropriate personal protective equipment (PPE) appropriate to the task and level of risk, and that the latter are trained and supervised in its proper use.
22. Suitable and sufficient supervision exists to confirm that each activity and/or task is executed in compliance with plans and procedures and delivers the expected outcomes.
23. Procedures are implemented to ensure that information which is critical to safe and efficient operations is effectively communicated between all relevant personnel, including crew shifts and rotations.
24. A process is implemented by which human factors, including fatigue management and workplace physical and mental demands, are considered, identified, analysed and addressed.
25. Health exposures or risks are managed through preventative and protection measures. An occupational health program is implemented to ensure that the health and safety of employees is maintained and industrial hygiene and medical surveillance programs appropriate to the location and work activity are implemented.
26. First-aid facilities and/or ready access to adequate medical services is ensured at every site based on complexity of operation, number of employees and remoteness of site (i.e. from basic first-aid to full-scale medics/paramedic intervention). An emergency off-site medical service (including medical evacuation) is available within 4 hours, even at the most remote sites.
27. Formal programs for supporting return to work and fitness-for-duty, and for promoting health, wellness and work-life balance are in place.
28. Processes are in place to promote catering hygiene and food and water safety at all operational sites.

The detailed requirements related to safe operation and maintenance are regulated in Appendix 6 of this Process Description. Please type **HSEMS** into your browser to see the latest version of the Appendix.

ELEMENT 7
ENVIRONMENTAL STEWARDSHIP

Our environmental footprint is reduced, natural values are protected, and climate-change-related risks are addressed. Environmental issues are addressed and controlled, consistent with policy, regulatory requirements and business plans. Environmental performance (including emissions, discharges and wastes) is tracked and stewarded to meet performance goals.

1. GHG emission plans that cover direct and indirect emissions are in place, monitored, and reported according to local legal requirements and MOL Group requirements.
   A CO_2 emission planning, forecasting, monitoring and reporting process is implemented for installations that come under the European Union Emission Trading Scheme – EU ETS (for more detail, please see Appendix 7 via the HSEMS microsite). An energy management plan is developed with the aim of reducing energy consumption, costs, and GHG emissions.
2. All air emission sources are included in an inventory, and key air emissions are monitored, controlled and reported and best available technologies for their reduction are considered.
3. Processes are in place to assess the impact of the current use of water sources in the long term and their availability (quantity and quality) for our operations, considering location-specific circumstances.
   An assessment of the technical status of distribution and sewage networks is performed at least every fifth year.
   At every site, all water consumers are identified and water-saving measures are considered at least every fifth year.
   The identification of potential pollutants relevant to specific site operations is completed and appropriate water treatment technology is in place. All key water pollutants are monitored, controlled, reported, and measures are applied to reduce water pollution and minimize smells and odours from operations.
4. A hazardous and non-hazardous waste inventory and classification are developed, maintained and reviewed at least every fifth year for each site/location.
   A waste management programme is in place, containing as a minimum the identification of waste streams for each operation and feasible measures should be taken to minimize their volume and associated risks, incorporating the methods of reuse, recycle, recovery, pre-treatment and safe and permitted disposal.
   Each operation must ensure that appropriate waste collection methods are in place (including for selective communal waste) and waste management techniques are applied to avoid soil and groundwater pollution and worker exposure.
   The responsibility of waste producers is exercised to ensure that handling and managing wastes is done in a proper and environmentally responsible way.
5. Each operations must ensure and regularly check the mechanical integrity of equipment to avoid any leaks or spills to environment, considering technical development and applying containment systems, operational monitoring and maintenance activities and all other necessary measures to prevent further damage.
6. Pre-existing soil and groundwater contamination at Group-owned sites (arising from past or current industrial activities) is addressed (for more detail, please see Appendix 7 via the HSEMS microsite). All sites are included in an inventory and are assessed and categorized according to a soil and groundwater hazard ranking. Assessments and hazard rankings are updated annually. A remediation program describing the necessary actions, foreseeable financial demands, responsibilities and a timeline is developed for all sites ranked high/medium risk.
7. A Biodiversity Action Plan (BAP) is developed, implemented, and reviewed in the case of changes in operation/legal requirements at each site that is in/adjacent to an environmentally sensitive area, and its effectiveness is evaluated annually. Biodiversity Action Plans are taken into account at the project-planning phase.
8. A process is in place to inventory and assess the impact of all sources of light pollution, noise, vibration and odour. Measures are in place to mitigate the related impacts via the pollution pathway.

The detailed requirements related to environmental stewardship are regulated in Appendix 7 of this Process Description. Please type **HSEMS** into your browser to see the latest version of the Appendix.

ELEMENT 8
INFORMATION & DOCUMENTATION

All the information required to ensure accuracy and consistency when applying risk controls is documented and systematically maintained. The HSE impacts of MOL Group's products and services are assessed, managed and communicated to customers and users to enable their responsible use. The introduction of new products/substances into manufacturing or operational processes is controlled.

1. A process is in place to identify, access, track, review and understand all legal HSE requirements that are applicable to the company. Compliance with relevant legal HSE requirements is assessed regularly.
2. In case that a company has standard-based requirement system(s) in force, or other specific industry recommended practices (e.g. IOGP, IADC), such system(s) must be fully harmonized with MOL Group HSE MS requirements.
3. All the information required to ensure accuracy and consistency when controlling risk is documented and systematically maintained.
4. The information necessary for the identification and understanding of HSE hazards derived from MOL Group activities and operations is continuously documented and maintained in an up-to-date status.
5. HSE documents are established and maintained in accordance with identified legal and other requirements in line with the required risk controls.
6. HSE documents are supported by guidance or training as appropriate to enable effective implementation by competent resources.
7. HSE documents and information exist in languages understandable to affected employees, contractors and other parties.
8. Processes are in place to ensure the latest version of approved HSE documents are available at the point of use.
9. Product stewardship processes identify risks related to dangerous substances/products at an early stage and manage those risks along the value chain (i.e. development, authorization, registration and restrictions on their manufacture, market distribution, use, disposal or recycle), thereby enabling adequate protection of human health and the environment.
10. New product assessments are conducted prior to introduction of product to market to identify and address HSE hazards and risk associated with their normal use and potential misuse. Periodic re-assessments are conducted if product specifications change, including the identification and review of adverse effects that are reported or experienced. All the information that the company possesses throughout manufacturing and distribution for all dangerous products is collected and kept updated.
11. A control process is in place and operating to cover all aspects of the introduction of new products or substances into manufacturing or operational processes.
12. Processes are in place and operational to ensure that operating conditions and risk management measures as defined in relevant Exposure Scenarios materials and substances are included in risk assessments.
13. Preparation and handling of Safety Data Sheets, packaging and labelling of products/ goods is defined and controlled.
14. A process is developed to include a REACH-relevant clause in contracts for all chemicals that are procured.

ELEMENT 9
STAKEHOLDER & COMMUNITY RELATIONS

Open, proactive and effective HSE communication and consultation is maintained with stakeholders regarding the HSE aspects of all of our business activities.

1. Open and proactive communication and consultation frameworks with all stakeholders are established and maintained during all stages of operation, including the phases of:
   a) Project development;
   b) Operation;
   c) Abandonment/exit.
2. An HSE communication plan is developed, implemented and reviewed regularly. This is part of the existing Community Engagement Plan, where such exists.
3. External inquiries are collected, investigated and responded to; grievance management systems and mechanisms are created for all the phases of the operational life-cycle at all MOL Group sites.
4. The responsibility for HSE-related stakeholder communication and consultation is clearly defined by the site operation manager.
5. Safety Councils are set up and operated where mandatory, or where they can contribute to the improvement of occupational health and safety performance.

ELEMENT 10
INCIDENT MANAGEMENT

Systems are in place to ensure that all HSE incidents are reported, recorded, investigated and analysed in a timely manner to prevent recurrence and improve performance. Corrective and preventive actions are undertaken, its effectiveness is evaluated and learning outcomes are shared.

1. HSE incidents are reported, recorded and classified based on their real and/or potential consequences.
2. HSE incidents are investigated by a dedicated team. High consequence incidents are investigated by a multi-functional team with the participation and leadership of an (organizationally) independent team leader. High consequence or high potential (HiPo) events are pre-discussed with MOL Group SD&HSE before official approval is given to reports.
3. The root causes of incidents are identified (from Severity 2). Corrective and preventive actions are identified and prioritized with the goal of eliminating or reducing the risk of recurrence of incidents and near-misses. Approved actions are implemented and implementation is tracked.
4. Lessons learnt from incident investigations are shared across the organization with stakeholders and others, as appropriate, to prevent incidents recurring.

The detailed requirements related to incident management are regulated in Appendix 8 of this Process Description. Please type **HSEMS** into your browser to see the latest version of the Appendix.

ELEMENT 11
EMERGENCY PREPAREDNESS & RESPONSE

Plans, procedures and resources are in place to effectively respond to emergency situations, to protect people/employees, the environment (including the workplace) and the public, and to preserve the company's assets and reputation.

1. Systems are in place to identify potential emergency scenarios and their likely impact, including on nearby operations and communities.
2. For identified significant scenario(s), emergency response plan(s) and related procedures are in place readily accessible and kept up-to-date. After major incidents, technology/site layout changes or other significant changes, emergency response plans are subject to revision.
3. Emergency resource plans for the above-mentioned scenarios define and describe all the necessary resources. Resources are kept readily available, maintained and tested/evaluated at least on an annual basis. The required supply of related equipment is ensured in a timely manner.
   A proper communication system between emergency response members and units, as well as with external response services, is defined and established.
4. Emergency response plan(s) must be appropriately and regularly communicated (with associated training) to all affected employees and contractors.
5. Emergency rules are communicated to visitors and other relevant third parties in the necessary depth and format.
6. An annual plan for emergency drills is in place. Emergency response preparedness (including evacuation) is drilled at least on an annual basis to validate the relevancy of plans and resources.
7. In the case of emergency situations, the emergency response is initiated and carried out based on the emergency response plans.
8. Emergency response plans are updated based on evaluations and lessons learnt.

The detailed requirements related to emergency preparedness and response are regulated in Appendix 9 of this Process Description. Please type **HSEMS** into your browser to see the latest version of the Appendix.

ELEMENT 12
ASSURANCE, MONITORING & IMPROVEMENT

HSE performance and systems are monitored, audited and reviewed to identify trends, measure progress, assess compliance and drive continuous improvement. HSE Planning is an integral part of business planning with strategic objectives, goals and annual targets to drive performance improvement.

1. HSE planning is an integrated part of Business Planning; schedules are always harmonized with the MOL Group planning calendar. HSE Planning at all levels is in line with the HSE and Social Impact Policy, approved HSE strategy (strategic objectives and actions), and with stakeholder expectations.
2. HSE performance in Businesses and in affected Functional Unit(s) is monitored, evaluated and reported using Group Performance Indicators and additional locally defined indicators if practicable to facilitate understanding of risk control / barrier weaknesses and identify opportunities for improvement.
3. Annual targets defined in MOL Group companies, including in their Business and affected Functional Unit(s), include targets related to HSE performance.
4. Annual HSE Action Plans (actions, tasks, projects and programs) are put in place and include the responsibilities, resources and time frames required to achieve annual HSE targets and strategic objectives; these should support HSE compliance improvement and HSE risk mitigation. Annual HSE Action Plan(s) are approved by the highest-level leader directly responsible for the performance of the business unit / entity (local CEO, head of unit, etc.).
5. Consolidated and interpreted performance information is used for management review, internal and external benchmarking and stakeholder communications and input for continuous HSE improvement actions and decisions.
6. Companies conduct and document gap analysis (self-assessment) about their compliance with the MOL Group HSE Management System. This self-assessment identifies the required actions for compliance and is kept up-to-date. HSE Management System gap analysis (self-assessment) is conducted in case of new Group HSE requirements, new acquisitions, significant changes in operation or newly established companies so as to identify the actions necessary to comply with Group HSE requirements within 6 months. Group SD&HSE is informed about the necessary actions and their status.
7. A documented risk-based Audit Program is established both on a Group and on relevant Flagship and OpCo levels to ensure compliance with Group HSE Management System requirements.
8. HSE Due Diligence is performed before any company acquisition, divestiture (in case of business decisions) or merger. Such HSE Due Diligence identifies risks and potential costs related to all HSE issues at the company or site that is concerned.

LIST OF APPENDICES

Please type **HSEMS** into your browser to see the latest version of the Appendices.

Nr.	Appendix title
Appendix 1	List of Modifications
Appendix 2	Glossary
Appendix 3	Detailed rules on Risk & Change Management (Element 2)
Appendix 4	Detailed rules on Competence, Training & Behaviour (Element 3)
Appendix 5	Detailed rules on Contractor Management (Element 4)
Appendix 6	Detailed rules on Safe Operation & Maintenance (Element 6)
Appendix 7	Detailed rules on Environmental Stewardship (Element 7)
Appendix 8	Detailed rules on Incident Management (Element 10)
Appendix 9	Detailed rules on Emergency Preparedness & Response (Element 11)
Appendix 10	Cross reference with standard based HSE Management Systems

GLOSSARY

Term	Definition
ADN	European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways.
ADR	European Agreement concerning the International Carriage of Dangerous Goods by Road
Affected employee	He/she is a person who works in an area in which the energy control procedure has been implemented.
Annual Action Plan	is a detailed framework indicating the responsibilities and ways and means of achieving established objectives within the allocated time span.
Area owner	A MOL Group Company organisation which is the owner and/or operator of the asset/equipment used for implementing the given task or operation (project, reconstruction, maintenance, etc.).
Assessment	A systematic and documented review of the effectiveness of implementation of HSE processes, programs and process regulations based on general process criteria and the professional judgment of experienced assessors.
Audit	A systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the management systems audit criteria set by the organisation are fulfilled.
Change	A deviation, either permanent, temporary, or incremental, from a currently established baseline, or anything that is or may be substituted for something else. This includes changes to personnel, processes, systems, plant and equipment, technology, documents, risks, legislation, commitments, obligations, other requirements, and external environmental, physical and social factors affecting or affected by the organisation.
Company	A Company in the MOL Group, or a company or other legal entity where MOL has operational control.
Company premises	MOL Group premises are locations, equipment, activities, or projects that are owned, operated, leased, or controlled through rights secured by MOL Group or its joint ventures or consolidated subsidiaries.
Complex works	Works (e.g. entire project or order etc.) lasting longer than 120 man-days and involving more than 2 contractor simultaneously (including all contractors and subcontractors; this usually means works such as constructions, demolitions, turnarounds, large tank cleanings, installations, pipeline lying, seismic, oil/gas drilling etc.). Range of complex works can be extended locally if stringent conditions are defined by local legal regulations or based on local consideration of hazards/risk of the area/activity involved.

Term	Definition
Contractor	A company or an individual engaged by a MOL Group Company to carry out specified work. These are typically facility/construction contractors (companies providing project-oriented facilities type work such us construction, demolition, rearrangement, equipment installation etc.), vendor on premises (contractors providing definable activities such as shipping operations, food services, medical services, manufacturing, drilling etc.), service contractors (companies performing installation and maintenance services). This definition includes all levels of subsequent subcontractors. Single Service Companies are considered as main contractors, however the following steps defined in this Regulation do not apply to them: • pre-screening and pre-qualification before contracting, • imposing HSE related monetary penalty, • post-evaluation, The Regulation is fully valid for the subcontractors of Single Service Companies. Mode of contracting: • Mode 1: On-site contractors - examples include usually contractors working at MOL Group technological/operational sites, such as maintenance, construction, demolition, rearrangement, equipment installation etc. The contractor provides people and tools for the execution of the work under the supervision, instruction and HSE Management System of the MOL Group. • Mode 2: Off-site or open site (e.g. exploration/production blocks) contractors - examples include usually contractors working outside MOL Group technological/process sites, such as drilling, seismic, well workover, transportation companies (hauliers), off-site construction (e.g. green field etc.). Case-by-case it must be decided whether circumstances and/or contractual conditions are not qualifying off-site contractors as Mode 1. The contractor executes (all) aspects of the job under its own HSE Management System, provides the necessary instructions and supervision and verifies the proper functioning of its HSE Management System. MOL Group is responsible for verifying the compatibility and effectiveness of the contractor's HSE Management System controls with MOL Group HSE Management System via pre-qualification scheme defined by this Regulation (if contract risk category level can be defined), or by other relevant business scheme. It must be clarified in the contract (e.g. in form of a bridging document) what elements of MOL Group HSE Management Systems will be followed by the contracted party. Retail Service Station partners/operators are not considered as Contractors based on this Regulation, however they must follow some elements of MOL Group HSE Management System as defined in business rules and contracts. • Mode 3: Contractor operates within its own HSE Management System that has no interfaces with the MOL Group HSE Management System and is not required to report HSE performance data including incidents to MOL Group. Examples include utility providers (e.g. telephones, electricity, sewage, water supply), recruitment agencies, advisory organisations, material/shop goods suppliers etc.

Term	Definition
Corrective action	Action designed to correct an undesirable HSE problem or defect in the management system. Examples may include breakdown of controls, non-conformance with MOL or regulatory requirements, accident, injury, illness, fire, release to the environment or other HSE-related loss, undesirable trends in HSE metrics, etc.
Dangerous goods	Dangerous goods are solids, liquids or gases that can harm people, other living organisms, property or the environment if released without necessary precautions being taken and/or if improperly stored, shipped, or handled. They are often subject to chemical regulations. Personnel specially trained to handle dangerous goods, which include materials that are radioactive, flammable, explosive, corrosive, oxidizing, asphyxiating, biohazardous, toxic, pathogenic or allergenic. Also included are physical conditions such as compressed gases and liquids or hot materials, including all goods containing such materials or chemicals, or may have other characteristics that render them hazardous in specific circumstances. They are materials that transportation of which is prohibited by Codes of ADR/RID/ADN/ ICAO/IMDG or other national and/or international regulations and/or permitted only subject to conditions.
Decommisioning	Planned shut-down or removal of a building, equipment, plant, etc., from operation or usage
Emergency	An abnormal occurrence that can pose a threat to the safety or health of employees, customers, or local communities, or which can cause damage to assets or the environment.
Emergency drill	An exercise intended to train people in duties and escape procedures to be followed in case of emergency.
Energy isolation	Energy isolation includes works that lead to isolation (discharging) of hazardous energies such as chemical (hazardous material), electricity, pressure, mechanical, hydraulic, thermal, gravitational, pneumatic or other intensity of which could endanger health and/or life of personnel by unexpected release of hazardous energy.
EU ETS	European Union Emission Trading System
Fatality	Death of a Company or Contractor employee resulting from work-related injury or occupational illness within 12 months of the incident. Death of a third-party person is considered as work-related if it involves: a) Company premises (e.g. a location, property, activity or project owned, operated, controlled or supervised by the company), or b) A location or operation (exclusive of Company premises) operated by others where the Company has 50% or greater working interest, or c) Road accident where culpability of Company (Company employee or Contractor on Company assignment) cannot be excluded.

GLOSSARY

Term	Definition
Fire	Process Safety Event related Fire: Any combustion resulting from a LOPC, regardless of the presence of flame. This includes smoldering, charring, smoking, singeing, scroching, carbonizing, or the evidence that any of these have occured. Other type of Fire An unplanned combustion. It includes electrical arcs that involve a subsequent fire or evidence of combustion (flame, smoke or charring). Note: All fires occuring on MOL Group technologies and/or assets are own fires. Fire occuring on contractors or third parties assets at MOL Group premisses is counted as contractor or third party fire.
GHG – Greenhouse Gases	The atmospheric gases responsible for causing global warming and climate change. The major GHGs are carbon dioxide (CO2), methane (CH4) and nitrous oxide (N20). Less prevalent --but very powerful -- greenhouse gases are hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF6). Reported as CO2 equivalent.
Hazardous area	Any MOL Group operational area where hazardous materials or hazardous energy sources that have the potential to harm are or are likely to be present.
Hazardous materials	In some countries dangerous goods are more commonly known as hazardous materials.
Hazardous process	Undesired, dangerous release of materials or energy (e.g., toxic or corrosive discharges, fires, and explosions) with potential for causing serious injury to people and/or significant property or environmental damage.
Hazardous waste (HW)	Waste featuring one or several hazardous characteristics listed in the local applicable legislation. In MOL Group HW is categorized according to source of waste production: a) arising from normal operation b) emergency events c) resulting from construction/demolition d) from past operations.
Hazards	Source or situation with a potential for harm in terms of injury or illness, damage to property, damage to the environment, or a combination of these.
HSE Competency Assessment	Assessment of employee's HSE competencies (knowledge, skills, abilities and behaviours) that influence one's jobs.
HSE event	An unplanned or uncontrolled outcome of a business operation or activity that has or could have contributed to an injury or illness, and/or damage (loss) to assets, the environment or company reputation. Incidents do not include operations, maintenance, quality or reliability incidents which had no potential or actual HSE consequence. Event has no HSE consequence only related to asset is not considered as HSE event.

GLOSSARY

Term	Definition
HSE Impacts	Any change that has adverse or beneficial effects on health, safety or the environment resulting from the organization's aspects. Some examples of impacts include toxic effects from exposure to chemicals, asphyxiation from confined spaces, resource depletion from energy usage, pollution from air emissions, and environmental release during product distribution.
HSE Incident	An HSE event or chain of events that has resulted in injury or occupational illness or damage (loss) to assets, the environment or company reputation.
HSE Non-compliance	A non-fulfilment of a requirement of a) HSE MS, policy, operational regulation and b) HSE related laws, legislation.
HSE Plan	It is a plan prepared by the main contractor in cooperation with its subcontractor(s) and approved by the area owner with the aim to ensure that the conditions, circumstances, hazards and control measures etc. of the planned high risk complex works have been considered and involved parties are properly prepared for the work activities.
HSE Risk	Combination of the likelihood and consequence(s) of a specified hazard occurring undesirable HSE event.
IADC	International Association of Drilling Contractors
IATA DGR	International Air Transport Association Dangerous Goods Regulations is a manual of global reference for shipping dangerous goods by air and the only standard recognized by airlines.
IMDG Code	International Maritime Dangerous Goods Code is accepted as an international guideline to the safe transportation or shipment of dangerous goods by water on vessel.
Induction training	HSE Training provided to new employees by the employer in order to get familiar with all necessary HSE requirements and risks before starting work individually.
IOGP	International Association of Oil and Gas Producers
KPI	Key Performance Indicator
Near-miss	An HSE event or chain of events that has not resulted in injury or occupational illness and/or damage (loss) to assets, the environment or company reputation, but had the potential to do so in other circumstances.
Observation	A systematic, independent and documented process for recognition of Unsafe Acts and Unsafe Conditions during execution of the regular jobs by employees.

GLOSSARY

Term	Definition
Permit to Work (PTW)	Is a written record that authorizes specific work, at a specific location, for a specific period of time. A PTW is an agreement between the issuer and the receiver, which documents the conditions, preparations, precautions and limitations before work commences.
PPE	Personal Protective Equipment. All equipment (including clothing) which is intended to be worn or held by a person at work and which protects him against one or more risks to his health or safety (e.g. safety helmets, gloves, eye protection, high-visibility clothing, safety footwear).
Preventive Action	An action designed to prevent or reduce the probability of occurrence of an undesirable HSE incident such as the breakdown of controls, non-conformance to MOL or regulatory requirements, accident, injury, illness, fire or other HSE related loss, etc.
Process	Any activity or set of related activities (including storage, manufacturing, use, handling, on-site transfer) and the associated equipment and technology.
Progressive disciplinary/ consequence application principle	A principle that ensures that consequences are applied depending on the magnitude, frequency and severity of safety rule violation, unsafe acting or creation of unsafe conditions. The disciplinary consequences usually vary from coaching, re-training, verbal warning, through first written warning, final written warning, cancellation of work permit, banning from site, monetary penalty, dismissal, blacklisting etc. Normally the most stringent disciplinary actions must be applied in case of deliberate violation of Life Saving Rules.
Product stewardship	Product stewardship is a concept whereby health and environmental protection centres around the product itself, and everyone involved in the life-cycle of the product is called upon to take up responsibility to reduce its health and environmental impact.
PSM	Process safety management. Application of a management system and controls (programs, procedures, audits, evaluations) to a manufacturing or chemical process in a way that process hazards are identified, understood, and controlled so that process-related injuries and incidents are prevented.
PSSR	Pre start-up safety review - a final checkpoint for new and modified equipment to confirm that all appropriate elements of process safety management have been addressed satisfactorily and the facility is safe to start up.
Reference document	Any document providing recommendations and support for HSE Management System users to implement MS expectations and requirements in practice. Reference documents include but are not limited to the following: Compliance checklists; Recommended practices; Best practices; Templates; Process methodologies; Training materials, etc.

GLOSSARY

Term	Definition
Requestor/ Contract owner	A MOL Group Company organisation requesting specific works to be carried out. For the purposes of this Regulation it is usually the area/asset owner or an organisational unit that is responsible for implementing the given task or operation (project, reconstruction, maintenance, etc.). In case of CAPEX projects implemented by Corporate Services – Investment Project Implementation, the term Requestor represents commonly Project (Asset) Owner organisation, End User and Investment Project Implementation.
RID	European Agreements Concerning the International Carriage of Dangerous Goods by Rail
Risk Assessment (HSE)	A systematic approach used to determine the degree of risk or vulnerability associated with identified hazards.
Risk category for Contractual works	HSE Risk category of the work(s) specified in the Request is classified based on the combination of safety critical activities and the area hazards involved. If the Request covers multiple works, the highest risk category must be applied. **Risk category** / Safety critical activity / Non-critical activity Hazardous area / high risk / medium risk Non-hazardous area / medium risk / low risk In case of frame contracts, the risk category and complex work category must be specified as per orders/contracts, and the requirements of this Regulation must be applied accordingly.
Root cause (Latent failure)	A Latent failure reflects something wrong with the Company's management systems and is resulting in preconditions. All latent failures can be put in one of Root Cause Categories.
Safety-critical activity	Activity with increased inherent safety risks. Minimum the following activities must be considered safety critical: • confined space entry, • safety critical hot work, • critical lifting, • works at height and/or over/under water, • ground disturbance deeper than 1,2 meters, • maintenance works of particularly increased risk, or condition (e.g. simultaneous operation, work on live high voltage system/ equipment, opening of vessel/equipment with hazardous content/ energy, overriding safety critical equipment/system, high pressure cleaning etc.); this list must be further defined in local operative regulation.

GLOSSARY

Term	Definition
Safety-critical equipment	Those equipment and systems whose failure could cause or contribute to an accident with severe or catastrophic consequences or whose purpose it is to prevent or limit the effect of such accidents.
Safety-critical operational processes	Processes in which failure would cause a significant increase in the safety risk for the people and/or environment involved.
Safety Data Sheet (SDS)	Safety data sheets are the main tool for ensuring that suppliers communicate enough information along the supply chain to allow safe use of their substances and mixtures. They include information about the properties of the substance (or mixture), its hazards and instructions for handling, disposal and transport and also first-aid, fire-fighting and exposure control measures.
SCC (VCA)	Safety Certificate Contractors. Procedure for the certification of the HSE Management Systems of contractors. Three levels of certification are distinguished: SCC* - focused on the control at workplace (for enterprises with less than 35 employees or if self-employed); SCC** - focused on the control at workplace as well as on the HSE structure (including HSE policy, organization, and improvement management); SCCP - focused on the control at workplace, as well as on the HSE structure (including HSE policy, organisation, and improvement management), and on specific supplementary requirements for the petrochemical industry.
Social Impact Assessment (SIA)	Social Impact Assessment a. can be integrated into Environmental Impact Assessments. b. shall give proper answer to whether risk management plan is necessary or impact monitoring is sufficient. b. must be prepared in line with local legislation.
Site	Geographically separated operational installation
Spills	Unintended or uncontrolled release of hazardous materials to the external environment (groundwater, surface/sea water, soil), not inclusive of any released volume retained within secondary or other confinement.
Targets	Detailed goals identified by an organisation as being necessary to achieve HSE strategic objectives. Targets are usually short term and achievable within a year and carry the most weight when integrated into the organisation's annual Business Plan. All targets should be realistic.
Third party	Any individual other than a Company, contractor or subcontractor employee. A personal injury of a third party person that occurs outside Company premises is considered work-related only if there is a culpability of the Company or contractor.
Toolbox-meeting	Is a short meeting before starting the respective work/ shift, to discuss issues that primarily focus on HSE topics. Generally is organized by supervisor of the working team (permit receiver of Contractor), with or without participation of the PtW issuer and is to share, interpret the details of the PtW.

GLOSSARY

Term	Definition
Unsafe Act (UA) and Condition (UC)	UA: a behaviour which increases unnecessary the risk for injury, damage or loss; UC: which could lead to injury, damage or loss if not corrected.
Validation	Validation refers to pre-approval of the HSE incident notification and/ or its closure by SD&HSE professional/expert and/or SD&HSE manager, i.e. whoever it is setup up within the validation process as a validator.
Vehicle	For the purpose of this regulation vehicles are self-propelled vehicles, such as trucks, cars and motorbikes etc.
Visitor	A person visiting MOL site, who is not a MOL Group employee or contractor at that site.

CROSS REFERENCE TABLE AMONG MOL GROUP HSE MS, PSM, ISO 14001 AND ISO 45001

HSE MS Element	PSM	ISO 14001:2015 standard	ISO 45001:2018
HSE Policy	Not defined	5.2. Environmental policy	5.2 OH&S Policy
1. Leadership, Commitment & Accountability	Specifically not defined (expectations defined as Area Management requirements - see PSM compliance checklist)	5.1 Leadership and commitment 5.3 Organizational roles, responsibilities and authorities	5.1 Leadership commitment 5.3 Organizational roles, responsibilities and authorities
2. Risk & Change Management	3. Process Hazard Analysis 4. Management of Technology Change 8. Management of Subtle Change 12. Management of Pers. Change	6.1 Actions to address risks and opportunities	6.1.2 Hazard identification and assessment of risks and opportunities 8.1.2 Eliminating hazards and reducing OH&S risks 8.1.3 Management of change
3. Competence, Training & Behaviour	9. Training and Performance	7.2 Competence 7.3 Awareness	7.2 Competence 7.3 Awareness
4. Contractor Management	10. Contractor Safety & Performance	N/A	8.1.6 Contractors
5. Design & Construction	5. Quality Assurance 6. Prestart-up Safety Review	partly in section: 6.1.2 Environmental aspects	partly in section 6.1.2 Hazard identification and assessment of risks and opportunities 6.1.4 Planning action
6. Safe Operation & Maintenance	2. Operating Procedures & Safe Work Practices 7. Mechanical Integrity Partly in 9. Training and Performance	8.1 Operational planning and control	8.1 Operational planning and control

CROSS REFERENCE TABLE AMONG MOL GROUP HSE MS, PSM, ISO 14001 AND ISO 45001

HSE MS Element	PSM	ISO 14001:2015 standard	ISO 45001:2018
7. Environmental Stewardship	Not defined	6.1.2 Environmental aspects 6.1.3 Compliance obligations as implemen-tation of 6.2 Environmental objectives and planning to achieve them	N/A
8. Information & Documentation	1. Process Safety Information	7.5 Documented information	6.1.3 Determination of legal requirements and other requirements 8.1.5 Procurement
9. Stakeholder & Community Relations	Specifically not defined (expectations defined as Area Management requirements – see compliance checklist)	6.1.2 Environmental aspects 7.4 Communication 8.1 Operational planning and control	5.4 Consultation and participation of workers 7.4 Communication
10. Incident Management	11. Incident Investigation & Reporting	8.2 Emergency preparedness and response	10.2 Incident, nonconformity and corrective action 10.3 Continual improvement
11. Emergency Preparedness & Response	13. Emergency Planning & Response	8.2 Emergency preparedness and response	8.2 Emergency preparedness and response
12. Assurance, Monitoring & Improvement	14. Auditing	6.1 Actions to address risks and opportunities 9.1 Monitoring, measurement, analysis and evaluation 9.2 Internal audit 9.3 Management review 10. Improvement	6.1.4 Planning action 6.2 OH&S objectives and planning to achieve them 6.2.2 Planning to achieve OH&S objectives 9.1 Monitoring, measurement, analysis and performance evaluation 9.2 Internal audit

NOTES