
HEALTH, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM¹

MAIN PRINCIPLES

HSE legal compliance issues and **regulatory requirements** are not aimed to be covered within the frame of this Regulation – that is regarded as a baseline of HSE operation and must be regulated by the individual legal entities (in their respective local regulations).

In case there is a contradiction between this Regulation and the local legal requirements, the local legal requirements must be followed, unless this Regulation defines stricter rules.

If a MOL Group company has a management system in place established in line with other standard-based management system(s) e.g. ISO 14001, ISO 45001 or other specific industry recommended practices (e.g. IOGP, IADC), this local management system must be fully harmonized with MOL Group HSE MS requirements.

In line with Group Strategy, HSE and Social Impact Policy and HSE Strategy, this Regulation aims to support MOL Group companies and leaders to implement effective HSE management. This Regulation comprises 12 elements with the following expectations:

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.

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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 Regulation.

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 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 Regulation.

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 Regulation.

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 Regulation.

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 CO₂ 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).

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).

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 Regulation.

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 Regulation.

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 Regulation.

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.

Cross-reference table among MOL Group HSE Management System elements, PSM, ISO 14001:2015, OHSAS 18001 and ISO/DIS 45001.2

HSE MS Element	PSM	ISO 14001 standard	OHSAS 18001 standard	IOSO/DIS 45001.2
HSE Policy	Not defined	5.2. Environmental policy	4.2. OH&S 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	partly in 4.4.1 Resources, roles, responsibility, accountability and authority	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	4.3.1. Hazard Identification, Risk Assessment and determining controls	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	4.4.2 Competence, training and awareness	7.2 Competence 7.3 Awareness

HSE MS Element	PSM	ISO 14001 standard	OHSAS 18001 standard	IOSO/DIS 45001.2
4. Contractor Management	10. Contractor Safety & Performance	N/A	from different aspects in 4.3.1. Hazard Identification, Risk Assessment And determining controls 4.4.6. Operational control 4.5.1. Performance measurement and monitoring	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: 4.3.1. Hazard Identification, Risk Assessment and determining controls	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	4.4.6 Operational control as implementation of 4.3.3 Objectives, targets and programme(s)	8.1 Operational planning and control

HSE MS Element	PSM	ISO 14001 standard	OHSAS 18001 standard	IOSO/DIS 45001.2
7. Environmental Stewardship	Not defined	6.1.2 Environmental aspects 6.1.3 Compliance obligations as implementation of 6.2 Environmental objectives and planning to achieve them	N/A	N/A
8. Information & Documentation	1. Process Safety Information	7.5 Documented information	4.3.2 Legal and other requirements 4.4.4 Documentation 4.4.5 Control of documents as implementation of 4.3.3 Objectives, targets and programme(s)	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	4.4.3 Communication, participation and consultation 4.4.6 Operational control	5.4 Consultation and participation of workers 7.4 Communication
10. Incident Management	11. Incident Investigation & Reporting	8.2 Emergency preparedness and response	4.5.3. Incident investigation, non- conformity, corrective action and preventive action 4.5.3.1. Incident investigation	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	4.4.7 Emergency preparedness and response	8.2 Emergency preparedness and response

HSE MS Element	PSM	ISO 14001 standard	OHSAS 18001 standard	IOSO/DIS 45001.2
12. Assurance, Monitoring & Improvement	14. Auditing	<p>6.1 Actions to address risks and opportunities</p> <p>9.1 Monitoring, measurement, analysis and evaluation</p> <p>9.2 Internal audit</p> <p>9.3 Management review</p> <p>10. Improvement</p>	<p>4.5.1 Monitoring and measurement</p> <p>4.5.3 Incident investigation, Nonconformity, corrective action and preventive action</p> <p>4.5.5 Internal audit</p> <p>4.6 Management review</p>	<p>6.1.4 Planning action</p> <p>6.2 OH&S objectives and planning to achieve them</p> <p>6.2.2 Planning to achieve OH&S objectives</p> <p>9.1 Monitoring, measurement, analysis and performance evaluation</p> <p>9.2 Internal audit</p>