



ORGANISATIONAL, MANAGEMENT AND CONTROL MODEL

Procedures Manual

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**ORGANISATIONAL, MANAGEMENT AND CONTROL MODEL
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PETRONAS

231 VNA MO 08

Rev. 00
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1. DEFINITIONS

PL Italy: the terms "PL Italy" and "Company" are used throughout the text and both refer to Petronas Lubricants Italy S.p.A.

Decree: the term "Decree" refers to Legislative Decree no. 231 of 8 June 2001 as subsequently modified and supplemented, regarding the administrative responsibilities of legal persons, companies and associations, including those lacking legal personality, in compliance with article 11 of law no. 300 of 29 September 2000.

Model: the term "Model" refers to the organisational, management and control model adopted by the Company in compliance with articles 6 and 7 of the Decree.

Addressees: the term "Addressees" refers to subjects to which the CoC is applicable i.e. all those who carry out, on the basis of a formal or only de facto qualification, management, administration or control activities within the Company and all those who are subject to the management and supervision of the former, as employees, consultants, agents, brokers and, in general, all third parties that carry out on behalf of the Company activities that are potentially exposed to risk due to persons perpetrating those crimes set out in the Decree ("Third Party Addressees").

Disciplinary Code: the term "Disciplinary Code" refers to the document which, constituting an integral part of the Model, is aimed at guaranteeing respect for the Model, procedures and standards of conduct. It sets out the sanctions and how they are applied in those cases where Addressees violate or fail to comply with the obligations, duties or procedures to which they are subject.

CC: the term "CC" refers to the Compliance Committee established by Petronas Lubricants Italy S.p.A. in compliance with Legislative Decree 231/2001, which is tasked with supervising implementation of the Model and ensuring that it is constantly updated and respected by Addressees.

2. INTRODUCTION

The present document contains the Company's list of procedures and instructions which constitute part of the Model and confer on the same the appropriate control structures required to prevent those crimes set out in the Decree.

There are two types of documents:

- Documents related to the Model and created *ad hoc* as checks for "sensitive activities" identified in the mapping of areas at risk of criminality as set out in the "Special Part" document;
- Documents of the integrated system for quality, environment and safety, referred to in the Model, whose control structures, already contained in the same or specifically introduced, are designed to prevent any conduct that is criminally relevant pursuant to the provisions of the Decree.

The Company's functions involved in the processes are required to promptly communicate to the CC any violation or derogation, relative to the standards of conduct and executive modalities governed by the procedures on the basis of the modalities set out in Section 13 "Information Flows to the Compliance Committee" in the "Special Part" document (231 VNA MO 03), which constitutes an integral part of the said Model.



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Any violations of the procedures and instructions constitute an illicit action which can in turn trigger the application of the specific sanctions set out in the "Disciplinary Code" document (231 VNA MO 05), which constitutes an integral part of the Model adopted by the Company.

3. LIST OF PROCEDURES AND INSTRUCTIONS

231 A P 01	Arexons Active Cycle
231 A P 02	Arexons Passive Cycle
231 A P 03	Arexons Cash
231 VN P 01	Active Cycle
231 VN P 02	Passive Cycle
231 VN P 03	Cash
231 VN P 04	Sales to Public Authorities
231 VN P 05	Management of informatics utilities and application profiles
231 VNA P 01	Recruitment and selection of personnel
231 VNA P 02	Inspections, Verifications and Controls
231 VNA P 03	Financial Statements Flows
231 VNA P 04	Agents Management
231 VNA P 05	Contracts Management
231 VNA P 06	Management of financing provided by public bodies
231 VNA P 07	Management of relations with Public Authorities
ACQ P 01	Purchase orders
ACQ P 03	Suppliers with environmental impact
ARX SPP I 01	DPI management
ARX SPP I 02	Alarms control in reception
ARX SPP I 03	Warehouse access management
ARX SPP I 04	Emptying window-washing and antifreeze recovery tanks
ARX SPP I 05	Bench control
ARX SPP I 06	Carrier safety standards
ARX SPP P 01	First aid management
ARX SPP P 02	Verification transit routes and signs clear and unimpeded
HSE A 01	Pg App. offer presentation
HSE A 02	Pg App. self-declaration of professional technical requisites
HSE A 03	Pg App. sub-contracting authorization
HSE A 04	Pg App. organisation Model inspection declaration
HSE A 05	Pg App. offer request
HSE A A	Pg App. CSS area risks and DUVRI
HSE A B	Pg. App. CSS general conduct standards
HSE AI ST 01	Piping & Instruments Diagram
HSE AI MI	Asset Integrity Management Manual
HSE AI P 03	Risk based analysis (HEMP Analysis)
HSE AI P 04	Inspections and controls
HSE AI P 05	Functional Safety
HSE AI P 06	AIM KPIs



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HSE AI P 06	AIM KPIs
HSE AI ST 01	Piping & Instruments Diagram
HSE CA 01	Pg App. health, safety and environment specifications
HSE I 002	DPI management
HSE I 01	Loading unloading of high risk ADR goods in tankers
HSE P 06	Security plan – ADR goods classif. as high risk
HSE P 07	Contracts management
HSE P 08	Management of PLI Research Centre site contract
PL FB I 03	Washing oils classification
PL FB I 08	Disconnection of electrics panels
PL FB I 09	Individual protection devices
PL FB I 13	Washing fluids management
PL FB I 200	Products loading in tankers
PL FB I 201	Unloading of raw materials from tankers
PL FB I 202	ADR-outgoing carriers control check list
PL HSE G 09	Preparation and response to emergencies
PL LO I 02	Drums unloading and line transmission
PL MI I 02	Above ground tanks safety
PL MI I 04	Plants modifications and modernizations
PL MI I 10	Plant maintenance, fumes reduction, grease department
PL MI I 11	Factory sewer network maintenance
PL MI I 12	CO2 emissions
PL MI I 13	Coolant plants management
PL MI P 01	Plants office management
PL MP I 01	Corrective maintenance
PL MP I 02	Programmed and predictive maintenance
PL MP I 03	Instruments calibration
PL MP I 05	Thermal station conduction
PL MP I 06	Discharge water purifier conduction and controls
PL MP I 08	Methane decompression cabin controls
PL MP I 12	Continuity groups manual by-pass
PL MP P 01	Maintenance service
PLI HSE G 07	Incidents management
PLI HSE G 09	Preparation and response to emergencies
PLI HSE G 10	Collectivity claims management
PLI HSE H 01	Suitability for work
PLI HSE PS 01	Process safety information (PSI)
PLI HSE PS 02	Process risks analysis (PHA)
PLI HSE PS 02a	HAZOP operations and risks analysis
PLI HSE PS 03	Preliminary safety evaluation (PASR)
PLI HSE PS 04	Engineering modifications management (EMOC)
PLI HSE PS 04a	Procedural modifications management (PMOC)
PLI HSE PS 04b	Organizational modifications management (OMOC)



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PLI HSE S	Ignition sources control
PLI HSE S 01	Work permits
PLI HSE S 02	Digging operations
PLI HSE S 03	DPI management
PLI HSE S 04	Energy utilities insulation
PLI HSE S 05	Access in confined spaces
PLI HSE S 06	Lifting operations
PLI HSE S 07	Work at height
PLI HSE S 10	Critical safety equipment bypass
PLI HSE SO 01	Shift workers management
PLI HSE SO 02	End of shift deliveries handover
PLI HSE SO 03	Non-ordinary dangerous activities
PLI HSE SO 04	Operations registers
PLN CQ I 29	Naples factory waste management
PLN MC I 18	Raw materials unloading from tanker
PLN MC I 20	Loading of finished products in tanker
PLN MI 15	Surface collection wells periodic control
PLN MI 19	Drinking water consumption registration
PLN MI I 04	Plants modification and modernization
PLN MI I 07	Emergency interventions
PLN MI I 10	Preventive maintenance
PLN MI I 13	CT boilers start-up/stop
PLN MI I 14	De-oiling plant periodic control
PLN MI I 16	Electricity consumption registration
PLN MI I 17	Industrial water consumption registration
PLN MI I 18	Mixing department electrostatic filter periodic control
PLN MI I 20	Methane gas consumption registration
PLN MI I 21	OCP/VII dept. electrostatic filter periodic control
PLN MI I 24	CT atmosphere emissions periodic registration
PLN MI I 27	CT water consumption registration
PLN MI I 28	Antifreeze water consumption registration
PLN MI I 29	Maintenance waste management
PLN RS I 02	Re-examination of indicators and objectives
PLN RS I 04	Safety sheets management
PLN RSI 02	Re-examination of indicators and objectives
PLN SP I 06	Warehouse operations
PLN SPP I 01	First aid
PLN SPP I 02	First aid kits management
PLN SPP I 03	DPI distribution management
PLN SPP I 07	Harness use
PLN SPP PE	Emergency plan (Na)
PO P 03	Personnel training
PO P 05	Reserved areas access regulation



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QA I 29	Safety standards for carriers
QA P 01	Documents and registrations management
QA P 04	Management re-examination
QA P 05	Internal inspection verifications
QA P 11	Environmental aspects
QA P 17	NC AC AP management
QA P 21	Legal prescriptions
QA P 23	Waste management
QA P 24	Risks evaluation (HEMP analysis)
QA P 25	Goals and objectives
QA P 26	Operational control
QA P 27	Communication, participation and consultation
QA P 28	Surveillance and measurements
QA P 29	Carrier conduct standards
QA P 31	Grease dept. tanker unloading conduct standards
QA P 32	Pallettizer conduct standards
QA PE	Emergency plan (Villastellone)
R&D I 01	Raw materials origin
R&D P 25	Safety data sheets and labelling
SES I 155	Laboratory samples emptying
SES I 206	Washing solvent trays emptying
SPP P 01	First aid management
ACQ P 01	Purchase orders
ACQ P 03	Suppliers with environmental impact
ARX SPP I 01	DPI management
ARX SPP I 02	Alarms in reception control
ARX SPP I 03	Warehouse access management
ARX SPP I 04	Emptying of window-washing and antifreeze recovery tanks
ARX SPP I 05	Bench control
ARX SPP I 06	Carrier safety standards
ARX SPP P 01	First aid management
ARX SPP P 02	Verification transit routes and signs clear and unimpeded
HSE A 01	Pg App. offer presentation
HSE A 02	Pg App. self-declaration of professional technical requisites
HSE A 03	Pg App. sub-contracting authorization
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HSE AI P 06	AIM KPIs
HSE AI ST 01	Piping & Instruments Diagram
HSE CA 01	Pg App. health, safety and environment specifications
HSE I 002	DPI management
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PLI HSE PS 02	Process risks analysis (PHA)
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PLI HSE PS 03	Preliminary safety evaluation (PASR)
PLI HSE PS 04	Engineering modifications management (EMOC)
PLI HSE PS 04a	Procedural modifications management (PMOC)



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PLI HSE S 02	Digging operations
PLI HSE S 03	DPI management
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PLN SPP I 02	First aid kits management
PLN SPP I 03	DPI distribution management
PLN SPP I 07	Harness use
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PO P 03	Personnel training



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QA P 05	Internal inspection verifications
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QA P 21	Legal prescriptions
QA P 23	Waste management
QA P 24	Risks evaluation (HEMP analysis)
QA P 25	Goals and objectives
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