



Trans Adriatic
Pipeline

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Security and Safety CCP

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TAP ITALY ESMS ONSHORE COMMUNITY SECURITY AND SAFETY CCP

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1 Abbreviations and Definitions

The following table provides definitions of acronyms and a glossary of terms used in this document.

Table 1-1 Abbreviations and Definitions

ALARP	As Low as Reasonably Practicable
CCP	Contractor Control Plans
CLO	Community Liaison Officer
COMPANY	TAP AG
CONTRACTOR	Construction contractors for Italy
Cultural heritage impact	A change to cultural heritage (in this context “cultural heritage” refers to any tangible (e.g. objects, artefacts, structures, spaces) or intangible element which is of value or importance to people’s culture, history and/or identity) which has occurred as a result of Project activities. Impacts may be considered to be positive or negative.
EBRD	European Bank for Reconstruction and Development
EHS	Environment, health and safety
Environmental impact	A change to the environment (in this context the “environment” refers to any aspect of the natural or semi-natural physical environment (air, water, soil etc.)) which has occurred as a result of Project activities. Impacts may be considered to be positive or negative.
ESIA	Environmental and Social Impact Assessment
ESIP	Environmental and Social Implementation Plans
ESMS	Environmental and Social Management System
EU	European Union
HSSSE	Health, Safety, Social, Security and the Environment
IFC	International Finance Corporation
KP	Kilometre Point relating to the pipeline route as per the base case described in the ESIA (it is possible that the location will change because of a re-routing)
Pipeline	Proposed pipeline scheme (TAP) including related facilities such as access

	roads, etc.
Project	Proposed pipeline scheme that will bring natural gas from the Caspian region to Western and South-Eastern Europe (TAP)
PRT	Pipeline receiving terminal
Socio-economic impact	A change to the existing socio-economic environment (in this context the "socio-economic environment" refers to the combination of any existing social and economic factors) which has occurred as a result of Project activities. Social factors may include aspects such as demographics, health and wellbeing etc. and may refer to individuals, groups or wider communities of people. Economic factors may include aspects such as employment, finances, livelihoods etc. An impact may be considered to be positive or negative.
STD	Sexually Transmitted Disease
TAP	Trans Adriatic Pipeline
TAP AG	Trans Adriatic Pipeline joint venture company
TMP	Traffic Management Plan
WHO	World Health Organization

2 Introduction

This Contractor Control Plan (CCP) identifies the commitments made in relation to community safety and security during the construction and commissioning phase of the Project and describes the COMPANY's requirements of CONTRACTOR in terms of meeting these commitments. Where a specific commitment from the Italy Commitments Register is described in this CCP, it is followed by its reference number as stated on the Project Commitment Register Italy (e.g. IT0012). Additional requirements have been included within this CCP where they are deemed to be internationally accepted or best practice. These additional requirements are not followed by a reference number.

As part of its planning and readiness for construction, CONTRACTOR is required to prepare its own specific Environmental and Social Implementation Plans (ESIPs) setting out how it intends to meet and comply with specific Project commitments set out in each CCP developed by the

COMPANY. This CCP shall act as a reference from which CONTRACTOR shall prepare an Onshore Community Safety and Security ESIP (IT0532).

Deviations that involve measures different from those contained in this CCP will only be permitted upon approval of the COMPANY.

The COMPANY Contractor's ESMS Framework Document (CAL00-RSK-601-Y-TTM-0001) provides an explanation of the linkage between CCPs and ESIPs.

2.1 Objectives

This CCP has been prepared to define the mitigation measures necessary to ensure that community safety and security practices are put in place, and that the risk of incidents and negative impacts are as low as reasonably practicable (ALARP¹) during the construction phase of the onshore sections of the Project in Italy. The objectives of the CCP are to ensure that community safety and security measures comply with the commitments made in the Project Environmental and Social Impact Assessment (ESIA) Italy and international best practice.

2.2 Scope

This CCP defines the COMPANY requirements (i.e. the commitments and best practice) in community safety and security management that CONTRACTOR shall implement during construction, including hydrotesting and commissioning.

The scope of this CCP includes

- community notification
- construction site management (with regards to community safety and security)
- traffic safety and management

¹ For a risk (or impact) to be ALARP it must be possible to demonstrate that the cost involved in reducing the risk/impact further would be grossly disproportionate to the benefit gained. The ALARP principle arises from the fact that infinite time, effort and money could be spent on the attempt of reducing a risk/impact to zero. It should not be understood as simply a quantitative measure of benefit against detriment. It is more a best common practice of judgement of the balance of risk and societal benefit.

- security
- worker – community interactions.

Measures for the prevention of pollution are defined in the Onshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0002) and waste management measures are defined in the Onshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0008) as these are linked to community safety with regards to emissions, discharges and release of contaminants.

Monitoring and inspection requirements related to this plan are detailed in the Onshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0006).

This CCP applies to all onshore areas that might be affected by the Project, including the working strip, construction site of the pipeline receiving terminal (PRT), construction site of the block valve station, access roads / dirt tracks, all temporary material and waste storage areas, pipe yards and public roads used by the Project.

2.3 Responsibilities

The COMPANY's role is that of compliance assurance as described in the Compliance Assurance Plan .

CONTRACTOR shall be responsible for ensuring that the Project (including all site operations, equipment and machinery) will comply with the defined Project Standards which encompass the requirements of Italian legislation, EU Directives, EBRD Environmental and Social Policy, IFC Performance Standards and IFC EHS Guidelines (IT0036). CONTRACTOR will comply with the requirements of the COMPANY Environmental and Social Management System (ESMS) (IT0516) (including this CCP) and the ESIA Italy.

CONTRACTOR shall be responsible for any adverse environmental, socio-economic and cultural heritage impacts arising from its activities and operations and for putting in place any necessary measures to avoid or if not possible mitigate them. CONTRACTOR will also be responsible for promptly reacting to accidental events and mitigating any resulting adverse environmental, socio-economic and cultural heritage impacts for which CONTRACTOR is responsible as much as

possible. Should these accidental events occur, CONTRACTOR will immediately inform the COMPANY. Should these accidental events be the responsibility of CONTRACTOR (i.e. events resulting from CONTRACTOR's activities, events in areas which CONTRACTOR is responsible for), CONTRACTOR shall consult the COMPANY on the best way to handle and/or mitigate immediate risks to Project stakeholders.

CONTRACTOR shall put these responsibilities into effect by

- writing an Onshore Community Safety and Security ESIP that describes how it will implement the requirements described in Section 3 of this CCP and other legal requirements
- implementing the Onshore Community Safety and Security ESIP by:
 - communicating the contents of the ESIP to its workers and subcontractors and training them to ensure they understand their responsibilities with respect to community safety and security, incident reporting and response
 - ensuring that adequate resources are mobilised for community safety and security including input from any specialist resources necessary to ensure effective planning and implementation of appropriate measures
 - ensuring compliance by its workers and sub-contractors with the procedures established in the ESIP
 - implementing effective monitoring of community safety and security measures to ensure that the effectiveness of community safety and security control and management activities are assessed and any issues are promptly detected, in accordance with the Onshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0006)
 - ensuring that all environmental, socio-economic and cultural heritage incidents are reported and dealt with effectively immediately and that lessons are learned in accordance with the procedures outlined in the Contractor's ESMS Framework Document (CAL00-RSK-601-Y-TTM-0001)
 - keeping the COMPANY fully informed of any environmental, socio-economic and cultural heritage issues.

CONTRACTOR shall be responsible for completing the Onshore Community Safety and Security ESIP in a timely manner and submitting it to the COMPANY for review and acceptance a

maximum of 30 days after Contract award. The ESIP will not be considered 'accepted for construction' until all comments raised by the COMPANY have been addressed by CONTRACTOR to the satisfaction of the COMPANY. Construction will not be allowed to commence before all relevant ESIPs are accepted.

3 Impact avoidance and mitigation

3.1 General onshore impact avoidance and mitigation

CONTRACTOR shall prepare information to be disclosed to Project affected communities regarding potential community safety and security impacts and mitigations at a sufficient level of detail to help these stakeholders to fully understand current and expected risks, and, as necessary, additional measures to be implemented.

CONTRACTOR shall submit the draft information to the COMPANY for review and consideration, and disclose and discuss the information with the affected communities under the COMPANY's supervision.

Some commitments are qualified with "where possible". If these cannot be implemented CONTRACTOR shall demonstrate to the satisfaction of the COMPANY why it not possible to comply with the commitment.

Based on an assessment of the quality and availability of existing health facilities, CONTRACTOR will provide access to health care for those injured by its activities.

To prevent incidents caused by material or construction defects, CONTRACTOR will apply quality control when purchasing materials (IT0977), undertake continuous supervision of construction works (IT0978), carry out checks on all welds using non-destructive tests (IT0979), and undertake a hydraulic test before putting the pipeline into operation (IT0980).

3.2 Health and safety risks to the Community

Throughout the construction contract, CONTRACTOR will:

- identify and evaluate the risks and potential impacts to the health and safety of the affected community and to establish preventative measures and plans to address these in an appropriate manner to prevent/avoid the risk of impacts over minimisation and reduction
- prior to and during construction activities, conduct regular community awareness campaigns to promote awareness and understanding of the health and safety risks associated with construction (IT0424)
- conduct regular worker HSE training (IT0424)
- prevent or minimise the potential for community exposure to hazardous materials that may be released by the Project
- identify communicable diseases of concern and develop an action plan where appropriate to prevent or minimise the potential for worker and community exposure to vector-borne and other communicable diseases that could result from project activities. Requirements relating to education of workers are described in Section 3.7.2.

CONTRACTOR's representatives will meet with local communities to explain the dangers associated with the construction works. CONTRACTOR will undertake a programme of stakeholder engagement and consultation to inform local communities of the risks of trespassing onto sites (IT0426). Particular emphasis will be placed on talking to children and their parents/teachers and explaining the dangers of construction activities such as road traffic, construction sites and open excavations. Education and awareness activities will follow the processes outlined in Section 3.3.

Where the Project poses material risk to or potential adverse impacts on the health and safety of affected communities, CONTRACTOR (with the permission of the COMPANY) will disclose relevant Project-related information, to enable the affected communities and government agencies to understand these risks and potential impacts, as well as the proposed prevention, mitigation and emergency response measures, as appropriate. This disclosure will follow the processes outlined in Section 3.3.

3.3 Community notification management

Liaison with communities is covered by the Italy Stakeholder Engagement and Corporate Social Responsibility CCP (TAP-ASM-PR-0003). Of particular relevance to community safety and security is the role of the community liaison officer (CLO) in providing information to communities (e.g. advance notice of road closures or diversions) and in receiving feedback and complaints from communities with regard to community safety and security issues on the Project.

CONTRACTOR will appoint an appropriate number of CLOs and communicate to them the requirements of this CCP (IT0455).

CLOs appointed by CONTRACTOR will

- deliver or organise safety awareness training to local communities (including teachers, local children and their parents), of the risks of trespassing onto sites (IT0426), placing particular emphasis on talking to children and explaining the dangers of construction sites and open excavations
- provide education on traffic safety to communities not normally subjected to high traffic loads.

The above CONTRACTOR CLO activities shall be conducted under the supervision of the COMPANY CLOs.

CONTRACTOR will, through the CLOs, meetings or other appropriate means:

- keep stakeholders in the immediate vicinity of the construction works informed about the planned activities, timelines, potential impacts and changes to schedules, if any (IT0463)
- provide land owners with timely and clear information on timing of construction works so that they become fully aware of the exact time for start of the construction and of the duration of interruption of agricultural activities (IT0348)
- pre-notify local municipalities of critical dust producing activities at least 72 hours in advance of the activities commencing
- consult ambulance, police, fire services and heads of communes regarding road diversions

- provide clear and timely information to tourism operators on the exact timing of construction works, so that they are fully aware of the time of start and the period of duration of construction (IT0372)
- continue informing/ updating local tourism businesses about planned construction (duration, number of workers, activities and locations) as well as operation activities to manage expectations by providing clear information regarding the extent of Project activities and associated risks to the community and environment (IT0363).

The above CONTRACTOR activities shall be conducted under the supervision of the COMPANY CLOs.

3.4 Construction site management

3.4.1 Pollution prevention and resource availability

The measures included in the Onshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0002), Onshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0008) and Onshore Resource Management CCP (IAL00-RSK-601-Y-TTM-0001) as implemented by CONTRACTOR will also mitigate the potential impact on community safety from emissions, discharges, accidental releases of contaminants, and the availability of freshwater resources.

In addition, CONTRACTOR will regularly maintain all Project vehicles and provide drivers with training in driving methods designed to avoid unnecessary emissions and which are considerate to the local communities (e.g. switching engines off when waiting to enter site or stationary on site, avoiding engine stress and reducing vehicle speed in and near communities) (IT0889).

Project vehicles will also be prohibited from driving through watercourses except in cases where this would be unavoidable for construction activities in order to protect water quality and prevent the potential impact on water abstractions or users. Should CONTRACTOR believe that it is necessary for vehicles to enter watercourses, CONTRACTOR shall request written permission from the COMPANY before proceeding. This request should be included in the Onshore Traffic Management Plan (TMP) (see Section 3.5.1).

3.4.2 Construction schedule

Construction activities on the coast will be suspended during the summer season in order to avoid interfering with tourism (IT0010).

3.4.3 Community safety during construction

During construction activities, CONTRACTOR will put in place the following community safety measures

- water will be pumped from flooded excavations (e.g. with centrifugal pumps) where a risk assessment concludes that they present a safety risk to people or livestock
- welded strings will be capped to prevent entry
- bridges (or other means of crossing) will be provided across open trenches and welded pipes at locations where there is a demonstrable need for people to cross, if it is reasonable for them to do so and can be accommodated safely taking into account works being undertaken in that area at the time
- the pipe will not normally be strung on the working strip more than 15km in advance of pipeline welding
- gaps will be left in pipe strings where safe to do so and where necessary to allow people, wildlife and livestock to cross the pipeline working strip
- protective barriers will be erected at excavations that are at a road or watercourse crossing or close to a community or that are flooded temporarily; warning barriers will be deployed around areas of lesser risk to members of the public
- warning posts and bunting will be erected to mark overhead cables and temporary crossing points (IT0058).
- signs will be put up around work fronts (in Italian and diagram form) advising people of the risks associated with trespassing (IT0430)
- to minimise the risk of trespass, fencing will be installed around temporary facilities (e.g. pipelay yards) for their period of operation (IT0430)
- the PRT and block valve station will be permanently fenced (IT0430).

The CONTRACTOR will participate in the COMPANY provided programme of education on risks of trespass at local schools and in the community.

3.5 Traffic safety management

The movement of personnel, machinery, plant and equipment on public roads has the potential to impact on community safety and has the potential to be the highest cause of community safety incidents. Hazards to personnel (and others (e.g. community members)) associated with vehicle transportation; both on- and off-road, will present one of the most significant risk exposures of the Project.

Accordingly, CONTRACTOR will develop and implement management procedures to reduce the risks associated with vehicle use. These procedures will include measures to reduce the exposure of vehicle drivers, their passengers and other road users to traffic hazards (IT0883).

3.5.1 Onshore Traffic Management Plan

CONTRACTOR will develop an Onshore TMP as part of the Onshore Community Safety and Security ESIP (IT0521) to reduce the risk of accidents (IT0817), in consultation with the competent authorities, traffic police and municipalities, and will ensure it is applied for the entire duration of the construction works (IT0827). The Onshore TMP must be accepted by the COMPANY prior to commencement of construction activities.

The Onshore TMP will be implemented to manage construction traffic generated by the Project, minimise traffic disruption and road user delay and provide for the on-going safety of road users, including pedestrians and cyclists (IT0876). The Onshore TMP will detail the management procedures to be put in place, including ensuring drivers of construction vehicles are competent, have undergone a health check (see Section 3.7.1), and they have attended a HSE course (IT0817).

CONTRACTOR's Onshore TMP procedures shall specifically cover arrangements for the following important aspects

- Project traffic speed limits on the working strip, work sites and access roads
- the source of and number of qualified drivers required
- training and approval requirements for drivers
- hours of driving and rest periods
- security arrangements for drivers, vehicles and loads

- arrangements for driver communication with control points and vehicle equipment
- language/communication issues
- the source of suitable vehicles (e.g. quality and specification)
- the number of vehicles required
- the programme for preventative vehicle maintenance
- identifying vehicle routes, route planning and alternative routes. This will include planning traffic routes to limit road use by the Project during high public traffic periods in order to reduce traffic risks to the community and the workers (IT0418)
- notifying the municipalities and police of all approved Project transport routes
- overall vehicle movements (such as a journey management system including procedures for the planning and undertaking of each journey)
- the emergency recovery of vehicles
- road safety programmes for schools (where Project traffic passes schools or roads used by school children to access school)
- establishing manned crossing points near schools during key hours in the morning and afternoon (where Project traffic passes schools or roads used by school children to access school)
- notifying the public of temporary road diversions and closures
- an appraisal of the socio-economic impacts of vehicles in the local community (such as the assessment of any traffic related complaints or incidents in communities reported via the COMPANY Third-Party Grievance Mechanism (found at <http://www.trans-adriatic-pipeline.com>) CONTRACTOR's third-party grievance mechanism or CLOs, community perceptions of Project related traffic impacts and positive or negative economic impacts through surveys or CLO meetings)
- procedures for undertaking regular inspections spot checks and audits of the transport system to ensure adherence to the Onshore TMP and for reporting problems (IT0892)
- traffic control procedures, including entering and exiting construction areas and the working strip (see Section 3.5.2)
- identifying emergency service vehicle parking areas. CONTRACTOR will ensure that part of the construction sites is set aside for the parking of emergency service vehicles. CONTRACTOR shall ensure that the Emergency Service Parking area and access routes around the sites are never occupied by any other vehicles and will be provided with a sign denoting Emergency Services Parking Area

- identifying construction personnel parking areas. CONTRACTOR is expected to make provision for a dedicated parking area on the construction base for the private vehicles of construction personnel
- arrangements to identify and co-operate with other major projects so that potential interactions do not result in significant environmental or social impacts.

The COMPANY reserves the right to have automatic monitoring systems installed in CONTRACTOR vehicles.

CONTRACTOR shall regularly update the Onshore TMP as the construction method is developed and vehicle movement requirements are identified in detail (IT0877).

3.5.2 Project traffic safety

CONTRACTOR Project vehicles will be readily identifiable as being in use by the Project (e.g. an easy to read/see sign or symbol will be placed on vehicles which shows that they are connected to the Project) (IT0891). CONTRACTOR will ensure that any sub-contractor vehicles are also identifiable as being connected to the Project.

Vehicle speed will be reduced while travelling on all construction roads. CONTRACTOR will enforce a 20 km/h speed limit on the pipeline working strip and appropriate speed limits for other work sites and access roads will be established and detailed in the Onshore TMP.

CONTRACTOR will require and provide driver safety, environmental, social and cultural heritage awareness training to promote safe and responsible driving behaviour (IT0420). Driver training will be provided to all drivers, and driving performance will be assessed and monitored with additional training provided if necessary. Project vehicle drivers will be trained/informed on safe driving as regards other drivers and non-motorised traffic, such as pedestrians, cyclists and livestock (IT0830). Night-time driving will be by exception only, as approved by the COMPANY, to minimise driving risk and disturbance to communities.

CONTRACTOR will also:

- control and supervise the arrival and departure of construction traffic at site entrances (IT0881)

- provide appropriate supervision to control the flow of traffic when machinery needs to cross roads
- maintain access and site roads in good condition (IT0828)
- actively discourage communities from using the pipeline right of way as an access road to grazing lands or properties (through use of signage, public education, leaflets, etc.)
- comply with all statutory vehicle limits (width, height, loading, gross weight) and any other statutory vehicle requirements, and ensure any subcontractors comply with statutory requirements
- provide signposted, parking facilities at pipe yards and at accessible locations on the road network. The parking of construction vehicles on footways, and double parking will be prohibited on public highways
- to minimize the risk of traffic incidents, all activities affecting roads will be notified to the local authority in advance of the activity taking place (IT0421).

In terms of traffic control, vehicles will be prohibited from reversing unattended into the construction base, construction sites or working strip along the pipeline route. Vehicles and plant shall enter and exit these areas in a forward direction, as far as possible. In addition, the Contractor will ensure that all heavy goods vehicles are equipped with audible reversing alarms.

Approved Project transport routes will be identified by the COMPANY and CONTRACTOR pre-construction and will be included in the CONTRACTOR Onshore TMP. If CONTRACTOR requires additional routes, a specific proposal will be submitted to the COMPANY and relevant authorities for consideration and acceptance. All heavy vehicle construction traffic will be assigned to suitable, approved routes to and from the working area (IT0829). All machinery and vehicles will be restricted to the designated working strip and approved access roads (IT0286). If possible, heavy truck traffic supporting construction activities will be routed away from noise sensitive receptors (IT0180).

Traffic density will be timed, wherever practicable, to avoid periods of heavy traffic flow along main roads. CONTRACTOR will not commence any work that affects the public highway until all agreed traffic safety and management measures essential for the works are accepted and agreed with the relevant authorities and the COMPANY. CONTRACTOR will enforce restrictions

on construction traffic movements during periods of heavy traffic on the road network if necessary (IT0884).

Where roads used by children to reach schools are utilised by Project construction traffic, CONTRACTOR will provide road safety education at schools and minimise Project vehicle traffic during hours that children are travelling to and from school. CONTRACTOR will also establish manned crossing points if identified as being required by the Onshore TMP.

CONTRACTOR will liaise with the police and other authorities to agree routes to be used by Project vehicles delivering 'abnormal loads' (i.e. slow moving, very high or wide loads) and their timing in conjunction with the highway authority (and the Municipal Police) (IT0885). CONTRACTOR will provide advanced warning of the routes and times of abnormal load deliveries (IT0886).

CONTRACTOR will be responsible for installing/setting up clear signs, flagmen and signals where necessary. Where temporary traffic signals or signs are required, the details and locations will be discussed with the relevant authorities. The signs will be fixed safely and securely to ensure that they do not become detached or dislocated, and will be visible and comprehensible by all. CONTRACTOR will also carry out maintenance checks to clean and re-secure signs if necessary.

Signage will be provided by CONTRACTOR (where it is not already present) to advise drivers of distances to the next passing location (to minimise inappropriate overtaking of slow moving vehicles), after the CONTRACTOR liaising with the relevant authorities where necessary.

3.5.3 Access, diversions and road closures

CONTRACTOR will produce a method statement for each road crossing, for acceptance by the COMPANY and approval by the appropriate authorities prior to commencing work (IT0093). Agreements will be made with the public or private owners and in consultation with local municipalities and regional road agencies. Public notice of construction activities and implications will be locally made available (IT0895). Prior to any road crossing construction, CONTRACTOR will notify and consult with all necessary agencies/authorities operating infrastructure impacted by the crossing (IT0967). Where the pipeline crosses roads with heavy traffic (regional and

provincial roads) and/or underground services and utilities (sewers, cables, etc.), CONTRACTOR will adopt trenchless techniques (e.g. shaft sleeve) (IT0966). Provision shall be given for the continuation of normal traffic during open-cut road crossings and all open cuts shall be covered at the end of each working day. Night-time work is prohibited except in emergency situations. If night-time work is required under an emergency operation, then warning lights will be used around the working site. Any road damage will be repaired to an equal or better standard as required by the Onshore Infrastructure and Utilities CCP (IAL00-RSK-601-Y-TTM-0011).

Traffic will be diverted around road crossing via detours or temporary roads (IT0091). CONTRACTOR will consult with the relevant government agencies to identify where project plans can complement existing road development plans at the district and provincial level (IT0878). CONTRACTOR will consult with the principal representative of any communities that will suffer a significant increase in traffic in order to develop awareness of the mitigation measures within the Onshore TMP (IT0879). Use of the roads along the coast, particularly the coast road between San Foca and Torre Specchia Ruggeri, by construction vehicle traffic will be avoided during the summer season as far as possible (IT0893).

CONTRACTOR will give the public at least 72 hours advance warning of any proposed temporary road diversions and closures (e.g. suitable signage and information in the press or via CLOs) (IT0888). Temporary road closures (during works for new or altered roads) will be scheduled as far as is practical during times which will minimise disruption to road users (IT0887) and will be planned in conjunction with the highway and other relevant authorities.

If road closures are required, CONTRACTOR will:

- plan and communicate diversions to the authorities (including emergency services and public transport providers) and affected communities at least 72 hours in advance (via a pre-construction community meeting or CLOs)
- ensure diversions are properly sign-posted
- provide CLOs at work fronts to ensure that impacts from planned or unplanned disruptions are minimised and that the disruptions are properly managed (IT0385, IT0386)
- provide crossing for pedestrians and animals, which may avoid the need for a diversion

- where possible, avoid any diversion that prevents a public transport service from continuing or requires a diversion of more than 1 km for vehicles or a diversion of more than 500 m for pedestrians or livestock
- for crossings of secondary rural roads, establish temporary diversions where no reasonable alternative local access exists (IT0896)
- prepare the pipe prior to commencement of roadway excavation in order to minimise the duration of traffic disruption (IT0092)
- comply with the following notification periods for road closures, if not otherwise stated in legal regulations. In all cases alignment with the local authorities and regulations must be carried out:
 - two weeks minimum notice on closure of up to 28 days
 - one month minimum notice on closure of 28 days to three months
 - three months' notice for closure over three months or for permanent closure.

At all times CONTRACTOR will ensure that access to commercial and residential properties is maintained and that alternative access is provided when roads are blocked during construction to allow those affected to access fields and other places of work. Should this not be possible, this will be agreed with users and compensation provided if required (IT0360).

In rural areas, CONTRACTOR will provide crossings over the pipeline construction area where possible to avoid any impacts associated with severance of grazing or agricultural land. The location of such crossings will be agreed between the CONTRACTOR and local farmers as part of the consultation on the construction management plan. The COMPANY will ensure that clauses are included in CONTRACTOR agreements to ensure that such crossings are carried out where necessary (IT0356). Where crossings of the construction area are not possible and farmers will experience a loss of grazing or additional journey times during the construction period, compensation will be provided (IT0359) in accordance with the Livelihoods Restoration Framework (LRF) (TAP-LEA-PL-0004).

Sensitive receptors such as hospitals and clinics will be identified along Project access routes. CONTRACTOR will ensure that access to and from these facilities is not restricted by Project activities or an alternative access is in place and has been agreed with the hospital or clinic staff. Project drivers will be trained so they understand the importance of ensuring free access and

egress of ambulances to the hospital and all traffic to clinics. Road diversions will not increase the response time of these services to local communities.

The Onshore Infrastructure and Utilities CCP (IAL00-RSK-601-Y-TTM-0011) includes the mitigation measures that will be implemented during pre-construction infrastructure and utility surveys, identification and authority approval of upgrades and the community liaison required.

3.6 Security

The COMPANY has undertaken a security review which will be provided to CONTRACTOR for information.

CONTRACTOR will produce an Onshore Security Review and Plan taking into account the findings of the COMPANY security review and the requirements described in this section. The Onshore Security Review shall:

- be risk based, taking into account local conditions
- describe the security arrangements the CONTRACTOR intends to put in place to restrict unauthorised access to, or use, of worksite facilities including ensuring access to the works areas will only be allowed for authorised Project staff.
- include details of training to be provided to security personnel
- assess risks posed by its security arrangements to those within and outside the Project site or facilities
- be submitted to COMPANY for acceptance prior to the start of work, including mobilisation, on any Project site.

CONTRACTOR will manage all aspects of its security activities and relationships transparently to the community and according to the Voluntary Principles on Security and Human Rights, and shall facilitate the participation of security subcontractors in all relevant training requirements (IT0434) and will also provide Health, Safety, Social, Security and the Environment (HSSSE) induction training for personnel on security issues. For further information on training, refer to the Onshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0012).

CONTRACTOR will ensure that the effects of the Project's security arrangements (safeguarding of personnel and property) respect local community interests. CONTRACTOR will adopt a policy and related procedures including rules of engagement on security services provision in accordance with the Voluntary Principles on Security and Human Rights (IT0434). Security guard interaction with the community must comply with the Voluntary Principles of Security and Human Rights. In that perspective CONTRACTOR will conduct a due diligence of all security personal/subcontractors and implement under the COMPANY's supervision trainings on the Voluntary Principles. Performance will be monitored and audited periodically by CONTRACTOR.

CONTRACTOR will, when work fronts are less than 100 metres from a community or house, employ and adequately train security guards from the local community to prevent trespass. When work fronts are within 100 m of an inhabited building, CONTRACTOR will park all equipment overnight in a demarcated area (IT0433). CONTRACTOR will ensure that the effects of the Project's security arrangements (safeguarding of personnel and property) respect local community interests. Security guard interaction with the community must comply with the Voluntary Principles of Security and Human Rights. In that perspective CONTRACTOR will conduct a due diligence of all security personal/subcontractors and implement under the COMPANY's supervision trainings on the voluntary principles.

The COMPANY will publically disclose its security arrangements. Prior to this, a Public Awareness Program will be developed by CONTRACTOR (and reviewed and approved by the COMPANY), to address the communication of various elements of the security programs, including the intended audiences, the kinds of security information to be communicated, frequencies and methodologies for communicating the information, and evaluation of the programs for effectiveness.

3.7 Worker-community interaction

The origin of the workforce is yet to be established. This is an important factor as, some source countries may have a higher prevalence of certain communicable diseases than Italy; raising the possibility of increased incidence in local communities as a result of worker-community interactions.

CONTRACTOR will prevent or minimise the potential for community exposure to communicable diseases that could be present within the Project workforce.

CONTRACTOR will monitor the emergence of major pandemics through WHO alerts. If the WHO Pandemic Alert Scale reaches level 4 in any Project area CONTRACTOR will implement the relevant Emergency Response Plan (IT0415). CONTRACTOR will not recruit workers from countries/areas where a WHO Pandemic Alert level 4 is in place.

3.7.1 Worker health screening

Regular health checks of workers will be conducted (IT0407). CONTRACTOR will require all workers and subcontractor workers to undergo pre-employment health screening, in compliance with relevant employment legislation. Thereafter, CONTRACTOR will ensure that all workers (including subcontractor workers) undergo regular health screening (every 6 months). CONTRACTOR will also offer voluntary pre-employment screening and ongoing screening for sexually transmitted diseases (STDs) (IT0425).

Pre-employment screening should be undertaken in an approved clinic in the worker's country of origin.

CONTRACTOR will ensure any trucking companies employed to work on the Project have policies around health screening of its workers in line with Project requirements and will ensure that truck drivers are also offered voluntary screening for STDs if not included in the truck companies' health screening programme. Truck drivers on the Project will also be included in an appropriate with-cause drug and alcohol testing programme (see Section 3.7.2 below).

3.7.2 Worker awareness, education and behaviour

CONTRACTOR shall avoid any local disputes and/or crime through respecting local culture and values. This requirement is applicable to all workers employed by CONTRACTOR and any of its subcontractors. As part of this, CONTRACTOR shall ensure that workers are aware of local issues and sensitivities.

The COMPANY will extend the Code of Conduct and/or other relevant documents (in particular the Stakeholder Engagement Strategy (TAP-HSE-ST-0009)) to include guidelines on worker–community interactions by which CONTRACTOR and all sub-contractors are required to abide.

CONTRACTOR will

- ensure all workers and subcontractors receive education around training on
 - the Code of Conduct
 - transmission routes and symptoms of communicable diseases of concern
 - STDs including transmission routes and symptoms
- ensure that all truck drivers who will work on the Project receive training on the code of conduct and disease awareness training
- provide free condoms and femidoms to all workers, sub-contractors, truck drivers, etc.

CONTRACTOR will conduct appropriate with-cause drug and alcohol testing of the workforce, record results and take the necessary actions. For further details please see the Onshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0012).

3.7.3 Community health care

CONTRACTOR will provide health care for any member of the community injured as a result of Project construction phase activities (IT0417).

4 Community grievances

Any grievances may be reported by members of the local communities via the COMPANY and CONTRACTOR CLOs, and/or the COMPANY Third-Party Grievance Mechanism (found at <http://www.trans-adriatic-pipeline.com>) and/or CONTRACTOR's third-party grievance mechanism.

CONTRACTOR will include information about both CONTRACTOR's third-party grievance mechanism and the COMPANY's Third-Party Grievance Mechanism (found at <http://www.trans-adriatic-pipeline.com>), including contact details, in all relevant communication materials.

If the COMPANY receives a third-party grievance relating to the activities of CONTRACTOR or its subcontractors, the COMPANY will forward the grievance to CONTRACTOR for resolution. CONTRACTOR will resolve the grievance in accordance with CONTRACTOR's third-party grievance mechanism. CONTRACTOR's third-party grievance mechanism shall be linked to and aligned with the principles of the COMPANY Third-Party Grievance Mechanism (found at <http://www.trans-adriatic-pipeline.com>).

Any deviation from the above will need to be substantiated and need to be submitted to the COMPANY for acceptance in writing.

CONTRACTOR will support the COMPANY's Grievance Managers in all respects and respond to its requests within 3 working days.

For more information on third-party grievance procedures, refer to the Third-Party Grievance Mechanism (found at <http://www.trans-adriatic-pipeline.com>).

5 Training

The training requirements relating to community safety and security can be found in the Onshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0012).

6 Monitoring and inspection

The monitoring and inspection requirements relating to community safety and security can be found in the Onshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0006).

7 Related documents

The following is a list of documents within the ESMS that, amongst others, have content relevant to this CCP:

- Contractor's ESMS Framework Document (CAL00-RSK-601-Y-TTM-0001)
- Onshore Resource Management CCP (IAL00-RSK-601-Y-TTM-0001)

- Onshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0002)
- Onshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0006)
- Onshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0008)
- Onshore Infrastructure and Utilities CCP (IAL00-RSK-601-Y-TTM-0011)
- Onshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0012)
- Community Safety and Security Plan
- Compliance Assurance Plan
- Stakeholder Engagement Strategy (TAP-HSE-ST-0009)
- Third-Party Grievance Mechanism (<http://www.trans-adriatic-pipeline.com>)
- Livelihoods Restoration Framework (TAP-LEA-PL-0004)
- Italy Stakeholder Engagement and Corporate Social Responsibility CCP (TAP-ASM-PR-0003).