



SAFETY DOCUMENT AND SAFETY PLAN CONCERNING CONSTRUCTION WORK PERFORMED DURING THE TA26 EXECUTION AT NESTE OYJ'S PORVOO PRODUCTION SITE

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REVISION 3/ 4.5.2026

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1. GENERAL

This safety document has been prepared for construction work carried out during the execution phase of the TA26 turnaround at the Neste Corporation production facilities in Finland. This document applies to construction work that falls under the Government Decree on the Safety of Construction Work (VnA 205/2009).

The PLM area (Production Line Manufacturing, Tank Farm) is not part of the restricted TA26 construction site area. Turnaround work within the PLM area will be carried out in compliance with the requirements set for construction during plant operation, as well as the turnaround work requirements specified in this Safety Document.

In connection with the turnaround, support, maintenance, servicing, inspection, and investment works will be carried out at the refinery and in areas managed by Neste Corporation in Kilpilahti.

As part of the maintenance scope, equipment subject to periodic inspections will be serviced and inspected, and repair works will be executed based on the scope's risk assessment. Specified preventive maintenance works will also be carried out within the maintenance scope.

The investment scope includes approximately 30 investments focused on ensuring safety and availability, as well as developing the efficiency of the production facility.

The turnaround works will mainly be carried out during the turnaround execution phase. Specified and risk-assessed works will be executed during the Pre-TA (prior to turnaround execution) or Post-TA (after turnaround execution) phases. In the Pre-TA phase, the most significant works include the construction of temporary facilities, opening cable trenches, pulling cables, closing cable trenches, piping and equipment installations, as well as works enabling the turnaround execution phase, such as scaffolding and insulation work.

The construction site is divided into sub-areas, for which responsible persons have been defined in accordance with the organizational charts for the different phases of the site. This division is based on refinery responsibility areas, taking into account the work to be performed in each area and the resulting workload for the responsible persons.

The following hazards must be taken into account as comprehensively as possible during construction planning and execution:

- The impact of site conditions (refinery process, industrial area) on construction
- The impact of construction on the refinery process and on process safety
- Hazards and risks related to construction

Construction-related definitions and practices are described in the following guidelines:

- ***Responsibilities and practices in construction work (Standard)*** – describes the practices in a project involving construction work.
- ***Task implementation safety planning at the Porvoo refinery (Standard)*** – describes the hazard assessment for all parties involved in construction and the practices for proactive safety planning when Neste acts as the principal contractor.
- ***Construction HSE Plan*** – describes the practices for TA26 investment projects.

Safety matters must be considered at all stages of drafting service contracts, in accordance with the *HSE Requirements for Service Providers* guideline. Safety guidelines and their updates are available to service providers through the HSE Network.

A separate PPE (Personal Protective Equipment) matrix has been prepared for the TA26 turnaround, taking into account the hazards and required protection for different tasks.

2. BINDING NATURE OF THE DOCUMENT

All parties of the TA26 project are obligated to fulfill all requirements within this document. TA26 Procurement organization is responsible for distribution of this document to all contractors.

Contractual partners of Neste Oyj are responsible for distribution of the document to their subcontractors and rental work force companies.

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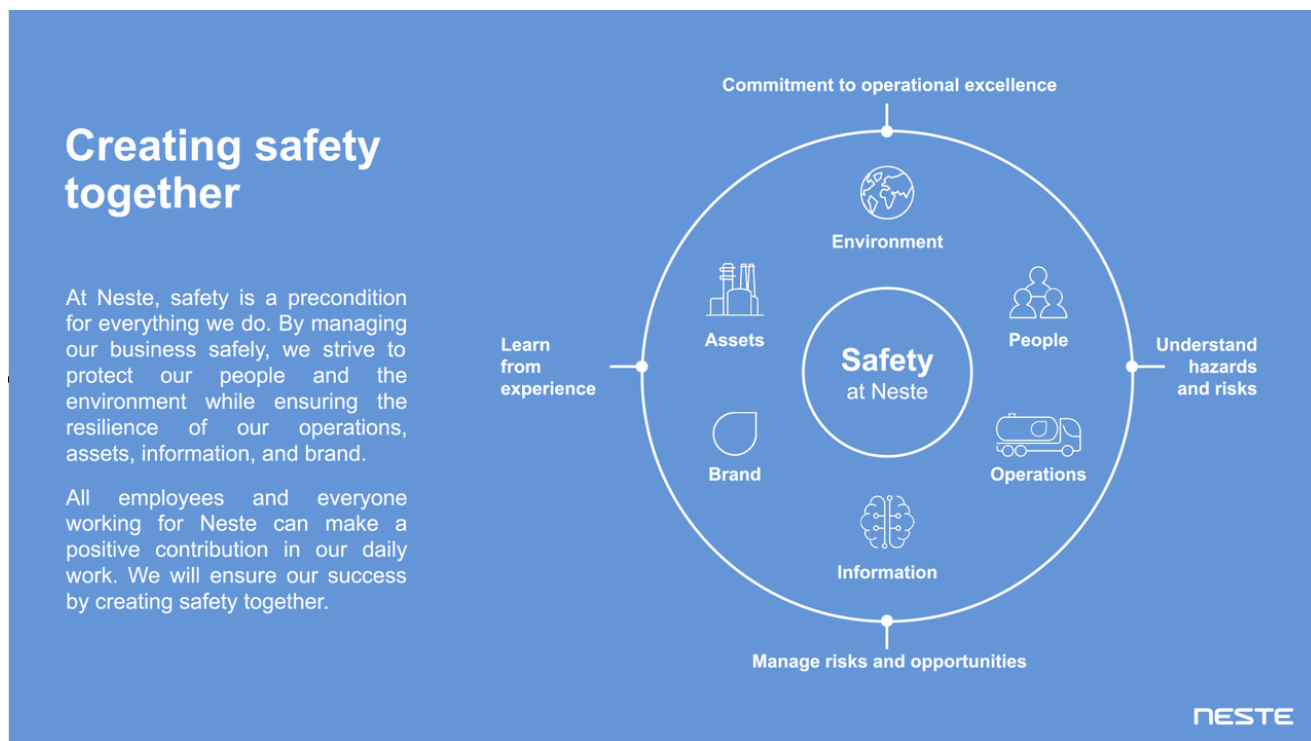
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3. SAFETY TARGETS AND PRINCIPLES

Safety is a prerequisite for the TA26 turnaround, and its uncompromising execution requires the contribution and absolute commitment of all parties involved. Safety must be integrated into all phases and activities of the project. Safety within the project is guided by Neste's safety vision:

Creating safety together



Five operations within the Neste Corporation Group's activities have been identified as posing a particular risk to personal safety. Based on these, the **Life-Saving Rules** have been established and defined, with the objective of reducing safety risks, saving lives, and ensuring safe working conditions. The importance and strict enforcement of these Life-Saving Rules are also emphasized throughout all phases of the TA26 turnaround.

The core principle is the uncompromising adherence to safety rules, as well as quality and installation instructions, to ensure personal, material, and process safety. Communications and training emphasize active caring, positive intervention, the importance of personal accountability for every worker, and leading by example

Life saving rules of Neste



Nine (9) safety development areas have been identified for the TA26 turnaround. Everyone working on site must pay special attention to these safety focus areas during both planning and execution:

- Overlapping work
- Working at heights
- Ensuring personal safety with PPE
- Safe starting of works
- Executing hot works
- Lifting Works
- Ensuring housekeeping level
- Safety leadership in night shift
- Developing safety of SD/SU

Targets of Construction Safety in Neste refinery in Finland are:

- Zero (0) injuries
- Zero (0) leakage
- Zero (0) ignitions
- Zero (0) Quality deviations
- systematic identification of high risk potential (=HiPO) cases and their investigation to determine corrective measures
- procedure for suspending unsafe work (SWA= Stop Work Authority) in place on construction site, and systematic monitoring of cases

Special attention to housekeeping must be paid in all areas and work sites. All those working in the area are expected to actively observe and report on safety matters and to immediately intervene in unsafe activities.

In addition, safety, health and environmental aspects are measured by the number of safe days (Safe Days).

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Safe Day definition:

TRI (Total Recordable Injury, all recorded accidents)	0
Fire or ignition	0
PSE1 or PSE2 (Process Safety Event)	0
Environmental permit violation	0
Traffic Accident	0

Occupational Safety Law 738/2002, Decree of the Government about the Safety of Construction work 205/2009 and other legislation obliging construction work, tools and equipment and hazardous substances must be complied with in construction work performed at refineries and other Neste areas in Kilpilahti. The principle is uncompromising compliance with safety rules and quality- and installation instructions, to ensure safety.

If a need is identified to deviate from the instructions and/or standards concerning Neste Corporation's Porvoo production facilities, it must be done in a controlled manner through management of change and/or risk assessments. In separate guidelines, special attention must be paid to the training and implementation of temporary instructions. An example of the aforementioned is the temporary instruction (Practices and changes during the TA26 execution phase (Standard)), which describes, among other things, the execution-phase deviations from the HSE Requirements for Service Providers guideline.

At Neste Oyj's Porvoo production plant, the safety, health and environmental strategy and HSE principles are based on the company's values and sustainable development policy.

4. ORGANIZATION

Neste acts as builder and principal contractor as defined in VnA 205/2009. Neste's execution managers look after the tasks of the principal contractor at the construction site. Neste Oyj is responsible for the design of Investment projects.

The builder's responsible persons are:

- Representative of the builder, TA26 Turnaround Manager Sami Kankaanoja
- Safety Coordinator, TA26 execution phase Jussi-Pekka Akkanen

Other responsible persons of the builder:

- Vice President of Refining, Markku Pirnes
- Head of Technical Authority Petteri Heinonen

Execution managers, responsible persons and contact persons of the principal contractor:

- Aksu Sorvari (PL1, PL3 and PLM)
- Aki Erkkilä (PL2 and PL4)

Occupational health and safety contact persons (HSE):

- Occupational health and safety manager
- Occupational health and safety representative of white collar personnel
- Occupational health and safety representative of blue collar personnel

Work permits are issued by the work permit organization of the Builder (Neste Oyj).

Each contractor must appoint a contact person representing the company for the implementation of safety cooperation.

If the employees on the construction site do not appoint their own occupational health and safety representative, the refinery's occupational health and safety representative of blue collar personnel will also act as their representative.

5. RISK REVIEW AND PLANNING OF SAFETY

All construction work within Neste's Oil Products Production requires a hazard and risk assessment as well as safety planning. Risk assessment, work execution safety, and site arrangements are planned in accordance with the following guidelines:

- *Six Step Procedure in Plant Investment Projects (Standard)*
- *Construction Risk Management (Standard)*
- *Construction Hazard Analysis (Work Procedure)*
- *Safety Planning for Work Execution in Finland Production (Standard)*
- *Work Permit Practices and Job Safety Analysis in Finland Production (Standard)*
- *HSE Requirements for Service Providers (Standard)*

The Site HSE Plan consolidates the HSE planning results of the builder, the principal contractor, and the contractor.

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Hazard and risk assessments for all parties involved in construction must be conducted well in advance, systematically, and comprehensively. These assessments must be taken into account in all work phases, safety planning, instructions, work planning, selection of working methods and equipment, and, above all, in work permit matters. For identified hazards, the resulting risk and impact on refinery operations and workers must always be evaluated.

Each service provider shall prepare their own HSE Plan. The preparation of the plan must take into account the following:

- The plan must also cover work performed by potential subcontractors.
- The plan shall be prepared in Finnish or English. It must also be available to workers in their native language or in a language that everyone understands.
- Before commencing work, the final version must be submitted to the Construction Manager via the supervisor responsible for the specific work package.
- The plan must include the identified risks related to the provider's own work and the methods to minimize them, as well as the hazards related to working conditions or the work package identified in the aforementioned documents, and how they are addressed in their own work.

Neste has provided detailed instructions for preparing the HSE Plan as part of the tender documentation.

The written work plans required by Government Decree 205/2009 (job safety analysis in Neste's electronic Permit Vision system) must be submitted to the Neste supervisor and the work permit issuer before any potential risk assessment meeting and the start of work.

6. REFINERY AS OPERATION AREA

Flammable, combustible, harmful for health and environment chemicals are widely in use at the Neste refinery. Refinery units are classified as units requiring security clearance based on the Industrial Chemical Act with the Finnish Safety and Chemical Agency (Tukes) as the supervisory authority. The safety management system required by the Industrial chemicals regulation is integrated in Neste's operating system, which is certified by Quality (ISO 9001), Environment (ISO 14001) and Health and Safety (ISO 45001).

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7. HAZARD REVIEW

General hazards of construction during operational refinery are related to:

- working conditions and
- construction work itself or
- caused through process safety.

Hazards of construction and maintenance work vary in different work phases, tasks and locations.

In addition to hazards described in the table below, there may be dangers in different production lines and areas and in different stages of construction that have not been taken into account in this general risk assessment.

Production line-specific details are presented in more detail in the line-specific hazard assessments for the construction during operational refinery and the execution phase of turnaround works.

7.1. Conditions

Condition / cause	Hazard	Related to
Chemical	Exposure	• exposure to flammable, corrosive or poisonous chemicals during handling of chemicals, equipments or pipe lines • exposure to hazardous substances on site during deviations caused by production units or equipments in the area
Working in EX-area (Explosive hazardous area)	Accident, ignition, explosion and process safety hazard	• pipe line, equipment, liquid and gas ignition during Hot work or outburst • ignition of oily insulation material during hot work • ignition of hydrocarbons in wastewater system • ignition of materials, gas and liquids in hot work location • release of static electricity • dust explosion
Confined Space work	Exposure, danger of accidents	• ignition/exposure of chemicals, (e.g. catalysts can be flammable and carcinogenic) • risk of suffocation in works where displacement of oxygen is possible (nitrogen phase, welding fumes) • collision hazard caused by narrowness • danger of falling

Moving and working in the area	Danger of accidents	- working in process units in cramped and ergonomically poor positions creates a risk of accidents - the areas of the units can be labyrinth-like → in possible dangerous situations, the risk of an accident increases - the dangers to workers caused by car, train, and tanker traffic - the dangers to workers caused by work machines (e.g. forklifts, cranes) related to construction and refinery operations
Cold/ hot conditions	Danger of accidents	- in winter, the cold, the proximity of the sea and the formation of frost/ice increase the risk of slipping and accidents - high surface temperatures of devices and pipes cause a risk of burns
Proximity to docks and pools	Danger of accidents	- risk of falling and drowning in the sea or pools - increased risk of accident and drowning in maintenance work performed while diving
Noise	Occupational disease hazard	in the area the noise level exceeds 85 dBa, which causes a risk of hearing damage

7.2. Direct and indirect hazards caused by construction work

Activity	Hazard	Related to
Lifting work	Danger of accidents, process safety hazard	- heavy objects and lifting routes without line of sight → danger of the load falling - simultaneous lifting of several small objects → danger of the load falling - poor condition or overloading of lifting aids → danger of the load falling - falling of a crane, lifting boom
Lifting of personnel	Danger of accidents	- person falling - fall of the personal lift (e.g. wind load) - lifting basket getting caught in structures
Working at heights	Danger of accidents	- moving in different heights (e.g. A-ladders) and risk of person falling while working and assembling scaffolding - falling tools or installation materials (while working in different levels) - danger of falling during removal of permanent working platforms or handrails

Installation of concrete casting forms and prefabricated elements	Danger of accidents	● falling, getting caught or falling under
Dismantling and Modification work	Danger of accidents, ignition and process safety hazard	● collision risk caused by limited space (personnel, process) ● falling (weight, asymmetric shape) or instability of dismantled pieces ● risk of ignition during hot works ● possibility of exposure to potentially dangerous substances found during the dismantling work (oils, asbestosis, lead)
Earth excavation, explosion and piling works	Danger of accidents, ignition and process safety hazard	● damage to underground structures, pipes, cables, wires ● discharge of energy or substance ● risk of accident, ignition and process failure, drowning ● explosion hazards, damage to structures ● accumulation of heavier-than-air gases in the excavation ● risk of soil collapse, dangers associated with earth moving and stockpiling ● dust ● contaminated soil may contain substances hazardous to health
Discharge of energy/substance during maintenance, Dismantling and coupling works	Danger of accidents, ignition and process safety hazard	● hazard of electrical accident and process safety incident in converters and other electrical rooms/ buildings during construction work in operational refinery ● hazard of discharge of substances from pipes/ equipment during preparation for maintenance (chemicals, gas, steam, hot water)
Hazards caused by mechanical machines and equipment	Danger of accidents, ignition and process safety hazard	● tripping, hitting objects ● limbs / fingers being pinched ● the dangers caused by the use of various machines, devices and hand tools ● significant risk of accidents when using pressurized equipment (painting, sandblasting, water)

Chemicals in construction work	Danger of accidents, exposure, occupational disease, ignition hazard	- solvents, glues and paints, etc. can cause flammable gas mixtures - welding gases and fumes can cause risk of displacement of oxygen and exposure to carcinogenic substances
Pressure test	Pressure discharge during a pressure test	In pressure tests of devices, the primary form of test is always the hydro pressure test. If a gas pressure test has to be carried out, the plan must be approved in accordance with the guideline Responsibilities and requirements in a pressure test (Standard). Carrying out a gas pressure test always involves personal and production plant risks.

8. OCCUPATIONAL HYGIENE INSPECTIONS

Based on the hazard assessment, occupational hygiene inspections are organized at the site if it is suspected that physical or chemical exposure is a danger to the health of the workers. Occupational hygiene inspections are agreed by the main contractor together with the builder's representative.

9. SAFETY- AND INDUCTION TRAINING

The obligations of service providers regarding the safety training of their own personnel and that of their subcontractors are described in the *HSE Requirements for Service Providers* guideline.

The principal contractor is responsible for ensuring that all site personnel complete the site-specific induction.

Additional training requirements, such as training related to TA26, will be communicated separately.

The service provider must induct its own personnel (including subcontractors) into the completed hazard and risk assessments as well as safety plans.

10. SAFETY RULES AND INSTRUCTIONS

10.1. General Safety rules

General safety rules applying to all service providers are described in the *HSE Requirements for Service Providers (Standard)* guideline.

Contract- and job-specific safety instructions are defined in more detail within the work and safety plans, work permits, and risk assessments associated with each specific task.

11. OBSERVATION AND INTERFERENCE

Every person working in the area is obliged to observe the work and working conditions. Actions that violate the rules or that are not safe (Stop Work Authority=SWA) must be intervened to ensure the safety of the employee and must be reported to the persons responsible for the construction work. During TA26, cases are systematically monitored and investigated to determine corrective measures

11.1. Visits to the construction site

A general ban on visitors is in effect at the Porvoo refinery during the TA26 major turnaround. General visits, refinery tours, or visits to the process areas will not be arranged between August 1 and November 1, 2026. The visitor ban does not apply to Neste's other operations in Porvoo.

Neste personnel from outside the site organization must report their visit to the execution managers and/or the safety coordinator.

Service providers are not permitted to bring their own visitors to the area without approval from Neste.

12. SECURITY

Unauthorized access and making an open fire in the premises of Neste industrial area is forbidden based on Police act 872/2011 and act 1104/2013. Fenced refinery area and fenced construction sites outside production line areas are covered with access control and recording camera surveillance by a security company.

Random checks will be conducted at the gates, including driving entitlement verifications and breathalyzer tests

Vehicles will be subject to random inspections to ensure the asset protection of materials and tools. Contractors are advised to mark their tools, equipment and materials clearly by stating their company name and contact details.

13. RECEIVING FINALIZED WORK AND HAND OVER PRACTICE

Hand-over plan will be prepared to describe the hand-over practice. The plan defines the scopes the hand-over will be made of. A separate plan is drawn up for each scope. The plan defines in detail the topics to be examined during the hand-over inspection.

14. DOCUMENTATION

The main language of the TA26 project is English and the second language is Finnish. The most important HSE documents are also prepared in Finnish.

Training materials will be provided in English and Finnish. Additional language needs will be separately evaluated.

Contractor HSE documents will be prepared in English or in Finnish. The HSE plan must also be available in the first language of personnel or in a language which all personnel understand.

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The different languages and interpretation arrangements related to communication in the refinery area must be taken into account when choosing service providers.

15. COMMUNICATION

Neste, as a principal contractor, fulfills the reporting obligations to the authorities in accordance with the instruction Responsibilities and practices in construction work (Standard).

The effects of the construction work to neighbors and surrounding areas of the refinery are communicated in cooperation with TA26 execution organization, HSSE manager and refinery communication department in accordance with the TA26 communication plan.

Construction site Incidents will be communicated to the authorities by Neste Oyj as the builder:

Notification	Authority - Responsible by Neste
Serious accident	LVV (Finnish Supervisory Agency) - TA HSE Manager
Occupational health and safety inspections	LVV (Finnish Supervisory Agency) - TA HSE Manager
Material damage caused during lifting works	LVV (Finnish Supervisory Agency) - TA HSE Manager
Serious dangers in explosion work	LVV (Finnish Supervisory Agency) - TA HSE Manager
Contaminated soil	LVV (Finnish Supervisory Agency) - Environmental Manager

First emergency notifications of serious incidents will be done via the alarm announcement system.

In crisis management communication, the communication channels used by Neste Oyj are e-mail, www.kilpilahti.fi website (in Finnish), Sedatus and SecApp - system distribution lists and, if necessary, a stock market or press release. These are also the channels through which service providers receive additional information about events.

Important general safety information for service providers will be available on Neste's public turnaround website www.nesteturnaround.com closer to the start of the turnaround.

The refinery also has information screens during the turnaround, where current issues are communicated to everyone participating in the turnaround.

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16. SAFETY MEETING PRACTICES

16.1. Meeting practices and instructing service providers

Kick-off meetings are held for all service providers by the site manager or supervisor.

Meeting minutes must be kept of all meetings.

Safety and occupational health and safety related topics and plans are discussed in work-related meetings.

The simultaneous operations coordination method (SIMOPS = Simultaneous Operations) is used as a way of working in projects where several parties are involved and several jobs are performed in the same area at the same time. SIMOPS is a meeting where simultaneous work on the construction site is coordinated and visualized using a map base.

16.2. Contractor HSE/supervisor meeting

Builder (Neste) ensures that, if necessary, a meeting is called to discuss current safety issues:

- safety statistics
- investigations of the most significant deviations
- ToolBox Talk topics
- concerns and other topical matters
- qualification and training status (if necessary)

16.3. ToolBox Talk practice

Neste Oyj requires service providers to have a weekly safety discussion (ToolBox Talk) with their staff. The topics covered and the people who participated in the discussions are reported weekly as part of the manpower report.

Neste can provide topical material for the safety discussions, but service providers are encouraged to also produce material related to their own work tasks.

Neste can also, if necessary, require service providers to go through a specific safety discussion with their staff, which the service provider reports as processed in accordance with the agreed procedure. Typical material for such safety discussion can be e.g. near miss-cases or lessons learned material from incidents occurred in the project.

17. SITE INSPECTIONS

17.1. Commissioning inspection of work machines and equipment

For all lifting aids, machines and equipment, the user and their supervisor are responsible for meeting the safety requirements. The inspections of the devices covered by periodic inspections must be completed (Vna 205/2009, chapter 4). Reports of the inspections must be available on site.

Lifting devices and lifting aids must also be checked at the work site before starting the work.

17.2. Weekly inspection of the construction site

The principal contractor is responsible for organizing inspection activities at the construction site and ensures that the weekly inspection of the construction site is carried out. The safety of electrical equipment is covered by the weekly maintenance inspection, in addition to this, Neste's separately appointed electrical equipment inspectors perform inspections of electrical equipment in construction sites.

The site manager or a similar person is responsible for the planning and implementation of inspection activities. With regard to construction during operation (if the work exceeds the AVI notification threshold and construction work is carried out for more than a week), a weekly inspection of the construction site must be performed once a week.

A record of the inspection must be drawn up. Corrective measures, schedule and responsible person must be noted in the minutes.

At least site managers, HSE supervisors, safety coordinators or their representatives are invited to the site inspections. Representatives of service providers are required to participate in inspections.

18. INCIDENTS- REPORTING AND INVESTIGATIONS

The service provider is obliged to immediately report any accidents, dangerous situations, environmental damage, ignitions and near-miss cases that happened to their own personnel or the subcontractors they use.

Deviations are processed in accordance with instruction *Incident Support and Learning (Standard)*. The builder's responsible person approves the prepared deviation investigations and the agreed measures. Corrective measures must be carried out without delay and they must be communicated to a sufficient extent.

The most serious deviations are reviewed with the line management of the refinery and the management of service providers.

19. NOTIFICATIONS TO THE AUTHORITIES

The principal contractor submits the advance notice of TA26 construction work to the Finnish Supervisory Agency and is responsible for employee reporting.

During TA26, other individual projects that do not belong to the TA26 construction site but are reported separately, may also be happening on the production lines.

Registration to the construction site takes place at the access gates of the refinery, separate registrations per production line is not carried out. Separate access control systems will be arranged for construction sites outside of production line areas.

In the Sedatus system, an up-to-date employee list is maintained per construction site. The information of the persons who worked on the construction site is reported to the Sedatus system, and the buyer, principal contractor and service providers are responsible for the up-to-date employee information for their own organization. The principal contractor reports the employee data to the Tax Administration

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every month.

20. REWARDING

Recognition awards are given during the project and at the end of the project for special performances that support and promote safety.

21. REVISIONS OF SAFETY DOCUMENT

This document will be updated as necessary. The safety coordinator of the TA26 execution phase is responsible for the updates.