Nord Stream Project

Health Safety Environmental and Social Policy (Operations)

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Rev.
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NORD STREAM AG

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ABBREVIATIONS

HSE   Health Safety and Environment
HSES  Health Safety Environmental and Social
HSES-MS  Health Safety Environment and Social Management System
1 INTRODUCTION

1.1 Purpose

This policy statement defines the overall Health Safety Environmental and Social (HSES) Policy for Nord Stream AG.

1.2 Scope

This policy statement outlines the principles of action for Nord Stream. It sets the goals as to the level of health, safety, environmental and social responsibility and performance required by Nord Stream, against which all subsequent actions will be judged. The policy statement has been written to be appropriate to the health, safety, environmental and social aspects of Nord Stream operating as a gas transportation company. It is based on the HSES Policy approved during construction of the Nord Stream project (document CG-GE-HSE-MAN-000-000000L0) but has been assigned an Operations Management System document number and has been signed as re-approved to coincide with the start of operating line 2, the end of the main construction phase of the Nord Stream project.

This policy has been established to meet the requirements of Clause 4.2 of ISO 14001:2004.

This policy will be reviewed and, if necessary, updated at least on an annual basis during the Management Review at the year end, unless a review is considered to be required more frequently.

This policy document also applies to minor construction, modifications and repair activities remaining after the hand-over of the pipe line system to operations.

1.3 Definitions

Table 1-1 Definitions

None
2 HEALTH SAFETY ENVIRONMENTAL AND SOCIAL (HSES) POLICY

NORD STREAM AG is a Joint Venture company for the operation of the Nord Stream gas pipeline linking Russia and the European Union via the Baltic Sea.

The scope of this policy statement includes all activities associated with the operation of the NORD STREAM AG Baltic Sea gas pipeline system, including all off-shore activities, all activities associated with the landfalls in Russia and Germany and all corporate and support activities.

NORD STREAM AG is committed to operating the pipeline system in a manner that ensures health safety and environmental protection, minimises adverse social impacts and is in line with the Equator Principles. This commitment is central to Nord Stream’s Health Safety, Environmental and Social (HSES) Management System, which provides the framework for health safety environmental and social management.

In line with this commitment, NORD STREAM AG will endeavour to:

- ensure continual improvement in HSES performance;
- ensure compliance with the requirements of applicable international standards, national standards and publically stated commitments;
- apply relevant standards of industry good practice where they exceed national regulatory standards;
- set specific HSES objectives and targets, and monitor our performance, in order to realise these goals;
- prevent pollution and protect the environment by minimising adverse impacts throughout the project life cycle;
- manage maintenance and repair activities, which NORD STREAM AG recognises as the main potential source of adverse HSES impacts, in order to ensure such impacts are avoided or reduced as far as practicable;
- provide a safe and healthy work place for employees and contractors and to care for the health and safety of the public;
- communicate and work closely with our contractors to ensure their understanding and shared commitment to conformance with this policy; and
- provide training in HSES matters to key employees and contractor representatives, where appropriate.

These objectives shall be met via provision of adequate resources by top management within NORD STREAM AG to support the implementation of the HSES-Management System (HSES-MS). This policy and other elements of the HSES-MS shall be regularly reviewed and updated in order to ensure its continued applicability.

It is the responsibility of each and every person involved NORD STREAM's business to be fully committed to the implementation of the HSES-MS and to the realisation of this policy.

Zug, 16th July 2012

Managing Director

Technical Director

HSE Manager
## 3 REVISION RECORD

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