Trans Adriatic Pipeline

Crisis and Emergency Response Strategy

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1. Introduction

TAP considers it an obligation to its employees / contractors and other stakeholders to be prepared to save lives and minimize damage to the environment, asset and TAP's reputation should an emergency occur.

1.1 Scope

The scope of this Crisis and Emergency Response Strategy covers all TAP managed activities in offices, sites and business travel. The scope also includes non-TAP managed project activity (e.g. third-party sites, transportation, etc.) where a third party has primacy but where there is an interface between the two organisations to ensure the crisis / emergency is managed in line with TAP values.

1.2 Purpose

This strategy describes the TAP Crisis and Emergency Response principles, policy and the response organisation, the measures required for crisis and emergency preparedness and TAP's expectations of its contractors for their crisis and emergency response arrangements.

2. Reference Documentation, Definitions and Abbreviations

2.1 Reference documents

- Crisis and Emergency Response Plan (TAP-HSE-PL-0007)
- HR support to the Emergency Response Plan (TAP-HRE-PR-0001)
- H&S and ESMS Data, Incident Reporting and Investigation (TAP-HSE-PR-0011)
- TAP Communications – Crisis Strategy and Plan (TAP-CEA-ST-0008)
- Emergency Response Plan – Appendix for Greece (TAP-HSE-PR-0014)
- Emergency Response Plan – Appendix for Albania (TAP-HSE-PR-0030)
- Emergency Response Plan – Appendix for Italy
- HSE Training (TAP-HSE-MO-0006)

2.2 Definitions

Country Office	the TAP organisation in each of the host countries (Greece, Albania and Italy) which reports to the Country Manager and which manages those parts of TAP's business not directly related to pipeline construction (the "Project"). County Office responsibilities include Stakeholder Management, Government Affairs, External Communication and Advocacy.
Crisis	A crisis is any event that is, or is expected to lead to, an unstable and dangerous situation affecting an individual, group, community, or whole society. Crises are deemed to be negative changes in the security, economic, political, societal, or environmental affairs, especially when they occur abruptly, with little or no warning.
Emergency	A sudden, unexpected, or impending event or situation that causes, or has the immediate potential to cause, injury, loss of life, damage to assets or the environment, damage to reputation or interference with the normal business.
Integrated Project Management Team	Dedicated team for project execution included TAP personnel with project functions and contractors from companies such as Technip, RSK and consultants and other contractors reporting directly to IPMT Organization. The IPMT has offices in the HQ and in the host countries (sometimes co-located with the Country Office).

2.3 Abbreviations

BoD	Board of Directors
CCT	Crisis Communication Team
CERP	Crisis and Emergency Response Plan
CLO	Country Liaison Officer
CM	Country Manager (of Country office)
CMT	Crisis Management Team (Level 3 - Baar - Strategic)
CO	Country Office
DM	Duty Manager
EA	External Affairs (including the Communications function)
EPC	Engineering and Procurement Contractor
ER	Emergency Response
ERO	Emergency Response Organisation
ERP	Emergency Response Plan
ERT	Emergency Response Team (Level 1 - at incident site)
ESCH	Environmental, Social & Cultural Heritage
ESMS	Environment and Social Management System
HQ	Headquarters (of TAP AG - Baar, Switzerland)
HR	Human Resources
HSE	Health, Safety and Environment
IMT	Incident Management Team (Level 2 – Country / project level)
IPMT	Integrated Project Management Team
ISOS	International SOS
LEA	Land Easement and Acquisition
MD	Managing Director
NGO	Non-governmental organisation
NOK	Next-of-Kin
PESTEL	Political, Economic, Social, Technological, Environmental, Legal
SPOC	Single Point of Contact
TAP	Trans Adriatic Pipeline

3. Crisis and Emergency Response Strategy

TAP's Crisis and Emergency Response strategy is to adopt a proactive and prioritised approach based on four principles (Section 3.1) where personnel are trained to provide initial assistance and to initiate measures to prevent escalation. The TAP response process facilitates continual review of the incident by establishing a structure for updates making it easier to recognise and prioritise actions.

To succeed throughout all levels of the TAP Crisis and Emergency Response organisation (ERO), this strategy is implemented by having;

- defined roles and responsibilities for all Crisis and Emergency Response teams;
- defined interfaces and communications between all teams at TAP Headquarters (HQ), Country Offices (CO), project offices and contractor organisations; and
- regularly trained duty managers and team members.

3.1 TAP Crisis and Emergency Response Principles

TAP's four Crisis and Emergency Response principles are:

1. **Principle of responsibility;** what lies within the organisation's responsibility in normal day-to-day business is also its responsibility in a crisis. This means that all levels of the organisation shall plan for pursuance and problem solving in an emergency.
2. **Principle of parity**; the emergency preparedness organisation should resemble the normal business organisation as much as possible.
3. **Principle of subsidiary;** all crises shall be handled at the lowest possible level to achieve a satisfactory response.
4. **Principle of cooperation**; the company has a responsibility to ensure the best possible cooperation with relevant stakeholders.

3.2 TAP Crisis and Emergency Response Policy

During any crisis or emergency involving TAP assets or personnel, our over-riding priorities are to PROTECT the following (in this order of priority):
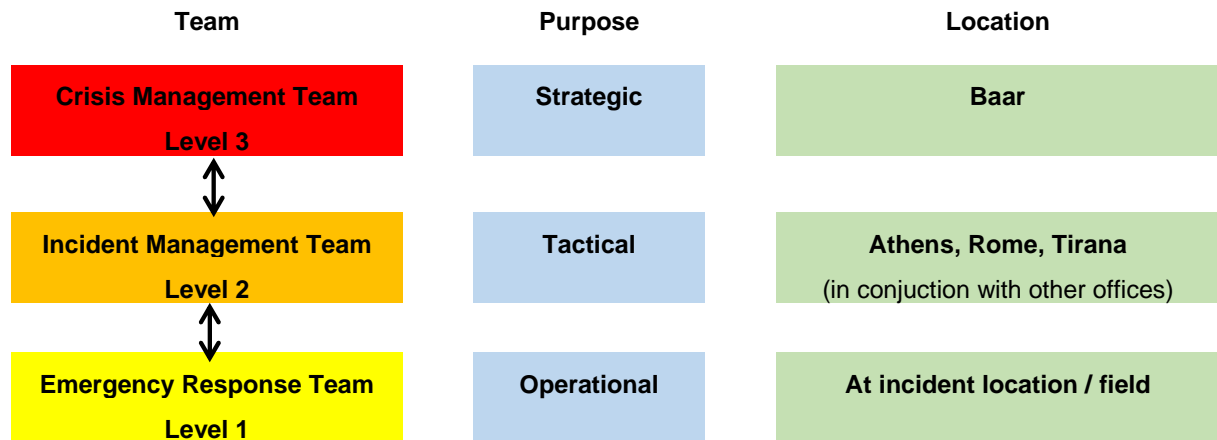
1. **People**
2. **Environment**
3. **Asset**
4. **Reputation**

3.3 Types and Severity of Incident

TAP's response is guided by the type and severity of incident. TAP categorises incidents as – *Health and Safety(H&S); Environment; Social; Cultural Heritage; Financial Loss; Reputation; and Operational Efficiency* and evaluate their severity using TAP's Integrated H&S, ESCH Incident Severity Matrix. This matrix and detailed information on incident reporting can be found in the document – *H&S and ESMS Data, Incident Reporting and Investigation* (TAP-HSE-PR-0011).

4. Crisis Emergency Response Organisation

The TAP Crisis and Emergency Response organisation is divided into three levels. Each level is located in relation to its purpose and each team has defined tasks to complete (Figure 4-1).

Team	Purpose	Location
Crisis Management Team Level 3	**Strategic**	**Baar**
Incident Management Team Level 2	**Tactical**	**Athens, Rome, Tirana** (in conjuction with other offices)
Emergency Response Team Level 1	**Operational**	**At incident location / field**

Main tasks:

Level 3 Crisis Management Team (CMT)
- Provide business level response focusing on strategic and business continuity issues
- Liaison with Shareholders, other stakeholders, media, next-of-kin (NOK)
- Liaison with Contractor headquarters/strategic emergency response centres
- Offer internal expertise as part of CMT (e.g. legal, insurance, procurement)

Level 2 Incident Management Team (IMT)*
- Provide overall coordination of the response in-country
- Liaison with government agencies
- Liaison with contractor emergency/incident team in-country
- Communications link with Level 3 CMT and Level 1 ERT

Level 1 Emergency Response Team
- Primary response at the emergency scene
- Make scene safe and prepare for investigation.
- Call-out and liaise with emergency services
- Communication link with the Level 2 IMT

*Figure 4-1 Crisis and Emergency Response Organisation*

* Note: For an incident in Switzerland the CMT will act as the IMT

4.1 TAP Contractor Crisis and Emergency Response Organisation

TAP requires that its contractors' Crisis and Emergency Response Strategy and organisations are aligned with TAP and that these arrangements are defined within the contractor's documentation and where required in additional bridging documents.

Figure 4-2 describes the interface between the contractor and TAP for a TAP incident; and Figure 4-3 for a contractor incident. Although TAP or the contractor has primacy for managing an incident relating to their own personnel / activity, close co-operation is required, including (if necessary) participation in each other's Level 2 Incident Management Team, to bring in additional country specific expertise.
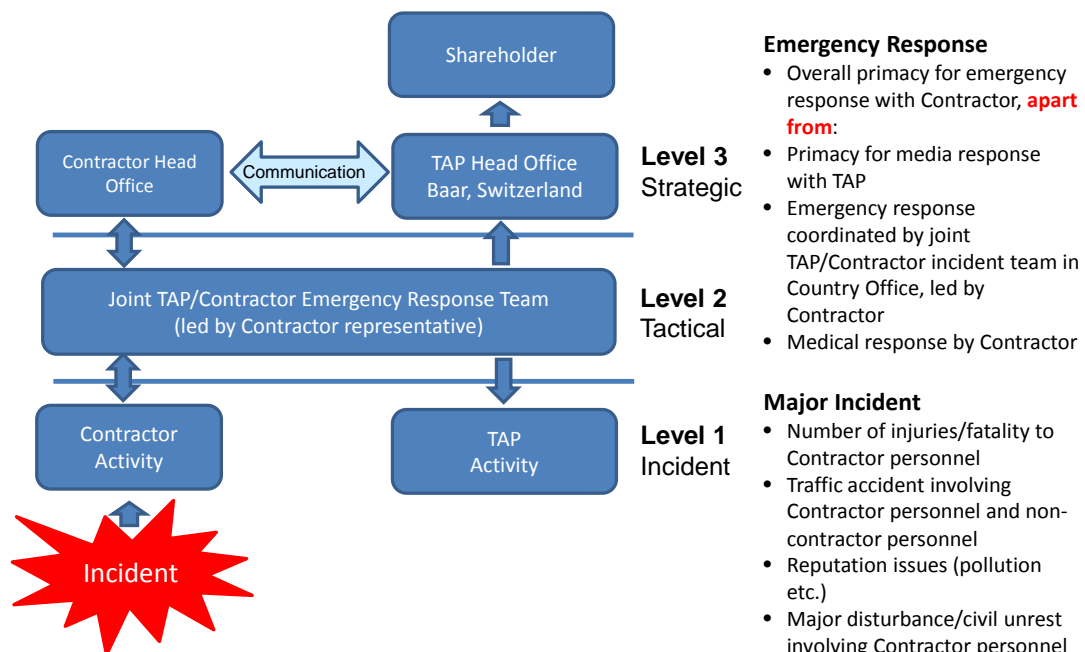
TAP / Contractor Interface - Major Incident involving TAP
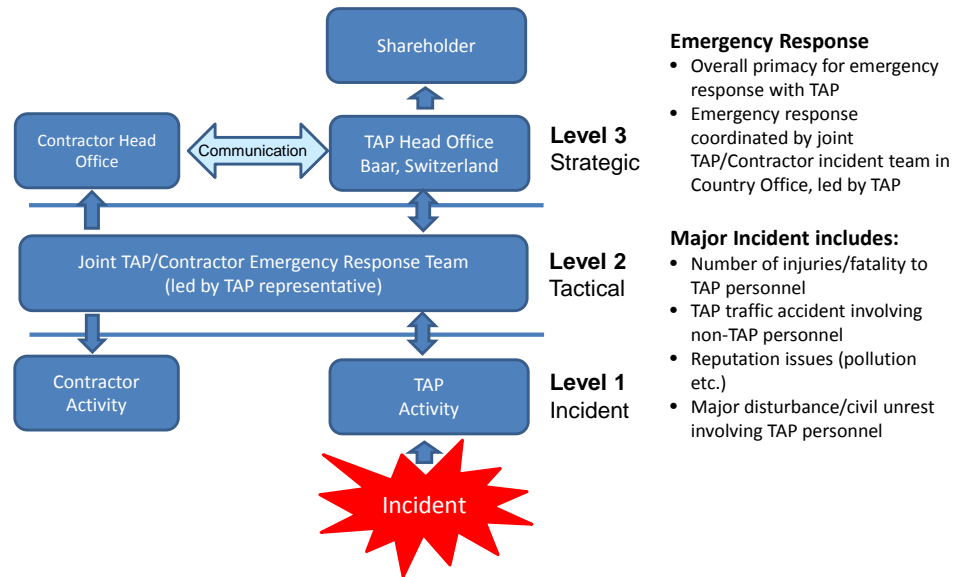
Emergency Response
- Overall primacy for emergency response with TAP
- Emergency response coordinated by joint TAP/Contractor incident team in Country Office, led by TAP

Major Incident includes:
- Number of injuries/fatality to TAP personnel
- TAP traffic accident involving non-TAP personnel
- Reputation issues (pollution etc.)
- Major disturbance/civil unrest involving TAP personnel

Figure 4-2 TAP Emergency Response Organisation in relation to Contractors – TAP incident

TAP / Contractor Interface - Major Incident involving Contractor

Emergency Response
- Overall primacy for emergency response with Contractor, **apart from**:
- Primacy for media response with TAP
- Emergency response coordinated by joint TAP/Contractor incident team in Country Office, led by Contractor
- Medical response by Contractor

Major Incident
- Number of injuries/fatality to Contractor personnel
- Traffic accident involving Contractor personnel and non-contractor personnel
- Reputation issues (pollution etc.)
- Major disturbance/civil unrest involving Contractor personnel

Figure 4-3 TAP Emergency Response Organisation in relation to Contractors – Contractor incident

5. Crisis and Emergency Response Plans

The functions and activities of the TAP Crisis and Emergency Response organisation are documented in the TAP Crisis and Emergency Response Plan or CERP. The country Incident Management Teams and supporting functions (Human Resources and Communications) provide detail for their respective teams in their documents (see Figure 5-1) which act as Appendices to the CERP.
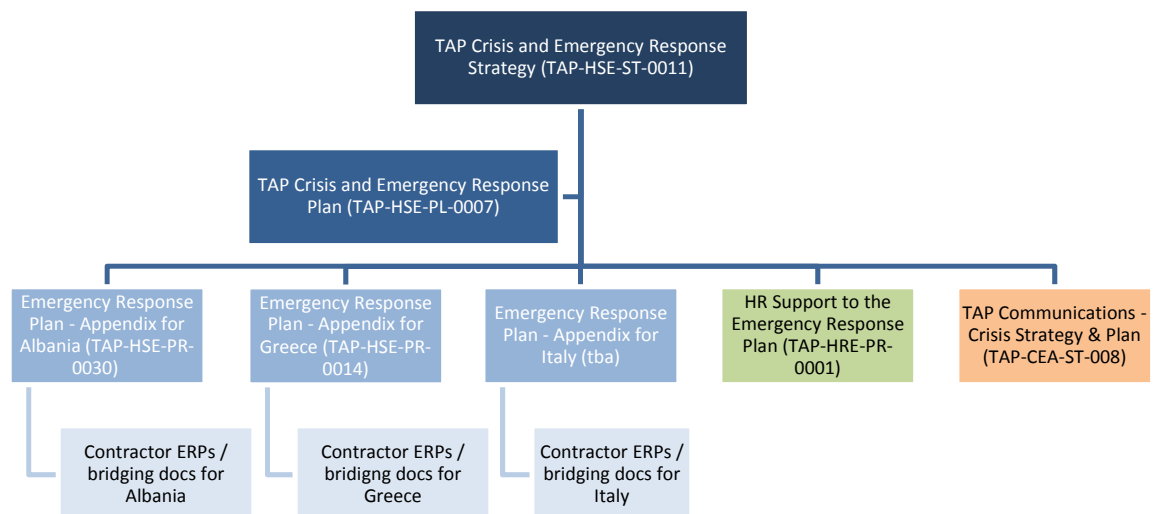

Figure 5-1 Hierarchy of Crisis and Emergency Response documentation

5.1 Human Resources

The Human Resources appendix to the CERP - *HR support to the Emergency Response Plan* (TAP-HRE-PR-0001) outlines the CMT Human Resources organisation; the TAP Casualty and Medical Evacuation Policy; and Guidelines on Notifying Next of Kin of Casualties and Fatalities.

5.2 Communications

The strategy for internal and external communications during a crisis or emergency is based on the following statement: ***In the event of any incident involving a TAP operated asset, installation and any operation with a third-party contractor, TAP will have primacy in media response.***

To achieve this, TAP must:
- Communicate effectively with all internal and external audiences (staff, political, media, shareholders, suppliers, third party service providers, authorities, regulators etc)
- Maintain proactive and effective relations with the media
- Keep in touch with the public mood
- Assign roles and responsibilities to employees

The details of this approach are found in the *TAP Communications – Crisis Strategy and Plan* (TAP-CEA-ST-0008). Additional notes on the TAP Communications Organisation and Guidelines for Issuing a Press Release are detailed in the CERP.

5.3 Contractors

TAP contractor emergency response plans / procedures shall clearly define their notification / mobilisation process between the contractor and TAP. In addition to this initial incident notification the contractor organisations shall define within their documentation their point of contact and contact details within the following functions;

- Operations Personnel and Teams
- Project Personnel and Teams
- Human Resources representatives
- Communications representatives
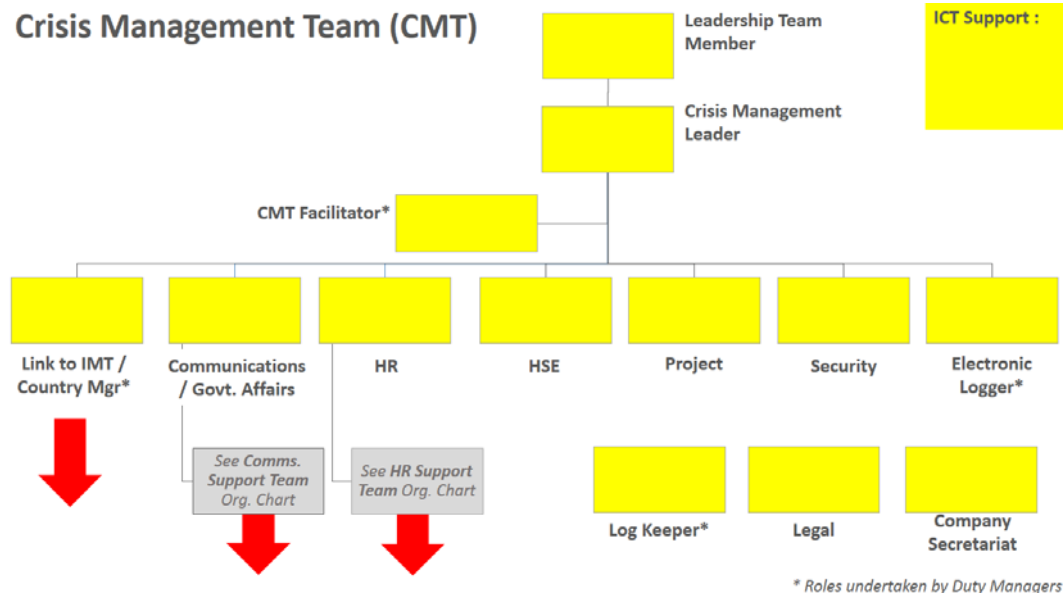
6. Crisis Management Team – Level 3

Figure 5-1 Overview of Crisis Management Team – Level 3

6.1 CMT Roles & Responsibilities

The following table summarizes the roles and responsibilities for each position within the Crisis Management Team (CMT). These are expanded upon in detail within the TAP Crisis and Emergency Response Plan (TAP-HSE-PL-0007).

'On Call' Duty Manager	• Primacy Contact for Notification • On 24/7 duty call out • Notify and brief members of the Leadership Team • Responsibility for mobilising the CMT • Responsibility for managing the overall response until arrival of the CMT leader
Leadership Team Member(s)	• Together with DM determine who will be the Crisis Management Leader & composition of CMT • Liaison with shareholders • Liaison with in-country Government and Ministries at senior level • Confirm TAP media strategy with Communications / External Affairs
CMT Leader	• Command, coordinate and brief the CMT • Consider "What-if" / Worse Case Scenario and plan accordingly • Arrange regular contact with Level 2 IMT. • Overall direction of business level and strategic response (PESTEL analysis)
CMT Facilitator*	• Provide focus for the overall decision-making process • Try to keep CMT 'on process' • Review and help to organise future staffing of the CMT • Coordinate administrative support to the CMT

Link to IMT*	• Provide the primary link with the Country Office IMT • Advise the CMT on the detail of the incident
Communications / Govt. Affairs	• Overall responsibility for coordination and communication of information, including to stakeholders • Identify overall Government Affairs strategy, in conjunction with Leadership Team Member • Coordinate the Crisis Communications Team • Liaison with Country Office Communications Representatives, and contractor Head Office communication representative • Advise the CMT on the political and external affairs in the affected country
Human Resources	• Overall responsibility for HR response • Develop and provide advice on the overall HR strategy, HR response and any strategic HR issues. • Liaison with Country Office HR Representative, and contractor Head Office HR representatives. • Coordinate and monitor the TAP HR Support Teams - Relative Response and Next-of-kin notification teams
HSE	• Provide advice to the CMT on HSE aspects of the incident • Liaison with Country / Project Office HSE / ESMS representatives • Provide overall advice on post incident investigation procedure
Project	• Provide advice to the CMT on Project issues • Assist the CMT Leader in developing strategies
Security	• Provide advice to the CMT on security issues related to the incident • Liaise and coordinate activities with the Country Office security representative • Liaison with any Swiss security organisations
Electronic Logger*	• Provide assistance with documentation and information management in the CMT • Document decisions taken in CMT briefings
Log-keeper*	• Maintain the logs within the CMT Room
Legal	• Provide legal support and advise on information handling • Consult with in-country legal advisers • Review press releases / other sensitive communications
Company Secretariat	• Coordinate with Leadership Team member and Communications regarding Shareholder communications
ICT Engineer	• Ensure that all IT systems working as required.
Admin.	• Support the CMT with specific business or technical knowledge • Assist in the identification of issues or development of strategies • Provide advice to Country Office teams specific to your discipline • Provide refreshments and secretarial assistance
Finance	• Provide financial advice regarding any necessary expenditure • Notify and liaise with insurers

* roles undertaken by Duty Managers

7. Incident Management Team – Level 2

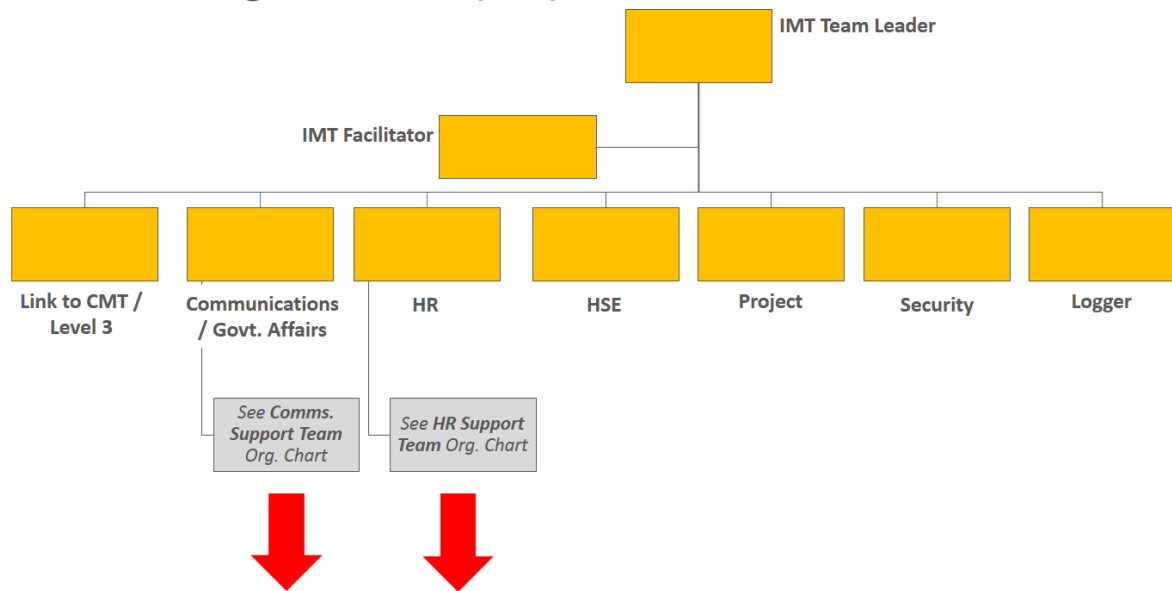## Incident Management Team (IMT)

Figure 6-1 Overview of Incident Management Team – Level 2

7.1 IMT Roles & Responsibilities

The following table summarizes the roles and responsibilities for each position within the Incident Management Team (CMT). These are expanded upon in detail within the TAP Crisis and Emergency Response Plan (TAP-HSE-PL-0007) and in the Emergency Response Plans for each country.

'On Call' Duty Manager (in country)	- Primacy Contact for Notification - On 24/7 duty call out - As necessary discuss with Country / Project Manager as necessary - Responsibility for mobilising the IMT - Responsibility for managing the overall response until the arrival of the IMT leader
IMT Team Leader	- Mobilise IMT personnel dependent on the severity of the incident - Overall command and co-ordination of the in-country emergency response - Liaison with TAP, Baar
IMT Facilitator	- Provide focus for the overall decision-making process - Try to keep IMT 'on process' - Review and help to organise future staffing of the IMT - Coordinate administrative support to the IMT
Link to CMT	- Provide the primary link with the Baar CMT - Advise the IMT on strategic updates from CMT

Communications / Govt. Affairs	• Provide advice to the IMT on the in-country media strategy. • Liaison with TAP Baar Communications Manager and in-country media advisors • Write, clear and release press statements in discussion / approval from TAP Baar. • Mobilise in-country communications advisors (if required) • Provide advice to the IMT on in-country political and external affairs issues • Liaison with in-country government departments and authorities
Human Resources	• Provide advice to the IMT on in-country personnel matters • Liaison with TAP Baar HR Manager • Liaison with HR representatives of in-country contractor companies. • Liaison with Next of Kin of in-country TAP personnel • Provision of HR support to Next of Kin in—-country or arriving in-country (meet and greet, reception at airports etc.).
HSE	• Provide HSE advice and support to the IMT • Liaison with TAP Baar HSE • Liaison with in-country regulatory authorities • Provide technical advice to IMT
Project	• Provide link with contractor representatives at incident site, and Head Office • Provide advice to the IMT on any issues regarding contractor activities, personnel and response
Security	• Provide security advice to the IMT • Liaison with in-country emergency response organisations (Police, security services etc) • Liaison with TAP Baar Security
Logger *	• Responsible for capturing key incident decisions and events and maintaining a full record of the response.
Admin.	• Provide overall administrative support to ensure the smooth running of the IMT
Others	• Provide support in area of experience as required.

* roles undertaken by Duty Managers

8. Emergency Response Team – Level 1

The Level 1 Incident Response Team will consist of an Incident Commander and On-Scene Response Team and provide immediate response at the incident site. The focus of this team is to concentrate on the priority of saving life, shutting down plant or equipment, making safe activities, equipment, operations or plant, and providing immediate medical support, protecting the environment.

The Incident Commander is also responsible for the overall coordination of the incident site response and for the call-out and liaison with emergency services and informing the Country/ project office of the incident and, when formed, liaising with the Incident Management Team.

During project activities, this role would be performed by the contractor managing the activities. In a TAP office setting, depending on the incident, command and response would be undertaken by either the office First Aiders, Fire Wardens or Duty Managers.

9. Notification

TAP has local TAP Emergency Numbers active in Switzerland, Greece, Italy and Albania and these are publicized throughout the organization. These numbers are supported by a 24/7 Duty Manager System in each country to ensure there is always a Duty Manager to answer the call.

The Duty Managers are trained to activate the response organisation through mobilisation of the country IMTs or the Baar HQ CMT and in all cases prudent overreaction is requested i.e. *if in doubt - inform*. The process of notification is included in the CERP and there is a Duty Manager aide memoire on the 'DM' page of the HSE APP.

Further details for all categories of incident notifications is found in *H&S and ESMS Data, Incident Reporting and Investigation* (TAP-HSE-PR-0011).

10. Training and Preparedness

To ensure the preparedness of the TAP Crisis and Emergency Response organisation annual training is scheduled. This training is described in the HSE Training Matrix in the document HSE Training (TAP-HSE-MO-0006) and there will be an annual training plan for the organisation. Training shall be delivered by both external Crisis Management training organisations and internally by the HSE function. Various delivery methods shall be used (see table below with examples).

Type	Description
Training Session	Training for individuals, parts of a sub-team or team designed to educate, enhance or increase knowledge or understanding of emergency response and their roles and responsibilities in the organisation.
Notification/ Communications Exercise	Exercise designed to validate communications or notification procedures within the CMT and IMT rooms (such as testing the call out of team members) or between IMT (country) and CMT (Baar).
Table top Discussion	Team members will be invited to talk through their responses to an incident, in the roles that they would fill in during an incident. This is done without simulation or time pressure to allow for clarification and discussion.
Simulation Exercise/ Practical Exercise	For the exercise, an identified incident risk shall be used to develop a scenario. Two levels of the Crisis and Emergency Response organization shall participate and the Teams will respond to scripted injects on a timed basis. The exercise may include external agencies and organisations to add realism to the exercise.

11. Post Incident

On completion of both real incidents and training exercises where the ER organisation has been mobilised, the personnel involved shall be debriefed and a report compiled to identify where the response functioned as planned and any areas for improvement.

Incident investigation shall be initiated in line with TAP documents *H&S and ESMS Data, Incident Reporting and Investigation* (TAP-HSE-PR-0011) and a report will be compiled. For some incidents, there may be investigations undertaken by external authorities or shareholder organisations.

On completion of these processes 'Lessons Learned' from the incident may be circulated within the TAP AG and shareholder organisations where appropriate.

12. Changes Since Last Revision

Revision	Description of Changes
6	Revision of all sections to align with Rev 5 Crisis and Emergency Response Plan (TAP-HSE-PL-0007).
5	New risk matrix.
4	General Update to include Crisis and Emergency Mgt. More definition of training and exercises
3	Clarify roles of Country Office and Country Project Office Added definitions Added risk matrix and incident severity Added options to make local (in-country) ER Duty Manager and notification system
2	Standardisation of terminology – the Emergency Response Organisation consist of the Emergency Management Team, the Incident Management Team and the Incident Response Team Interface with Contractors clarified and removal of the term TSP. Addition of HSSE Manager to the EMT. Reference to the Emergency Response Plan(TAP-HSE-PL-0007) which replaces Emergency Response Plan Country (Generic) (TAP-HSE-PL-0007) and Emergency Response Plan Level 2 & 3 (TAP-HSE-PL-0008). Attachment on exercises incorporated into section 7.
1	Updated to reflect the changes to the ER Organisation from two separate Levels 2 and 3 to a combined Level 2 and 3 with the Figures, roles and responsibilities also amended Legal and Procurement sections included
0	First issue