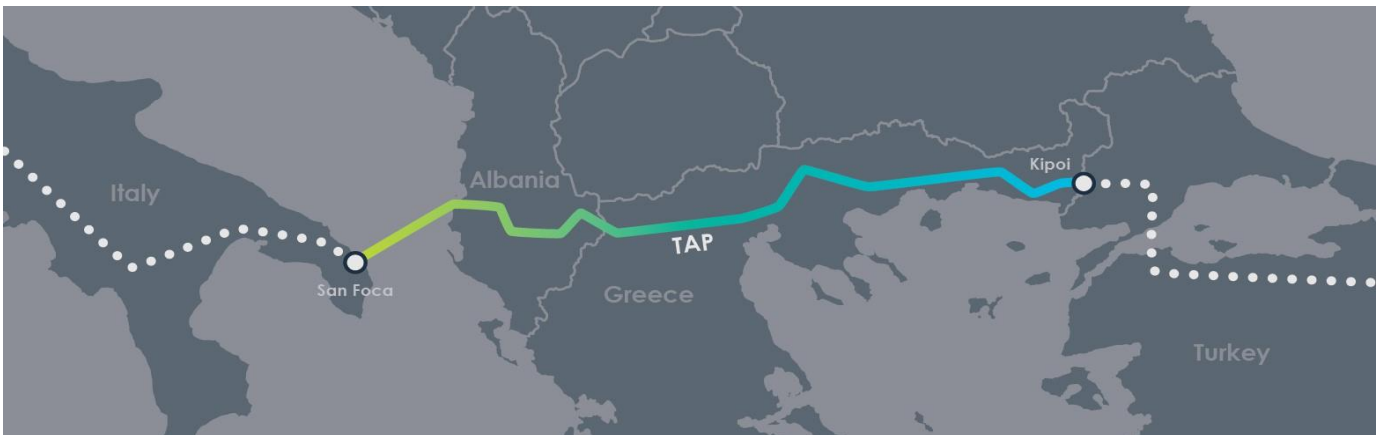




Trans Adriatic
Pipeline



Environmental and Social Management Manual

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1. Introduction

The Trans Adriatic Pipeline (TAP) is designed to transport natural gas from the Shah Deniz II development in Azerbaijan to the European market by bringing gas to the Italian network.

The TAP pipeline has the following main economic and strategic benefits:

- Diversification of gas transportation routes
- Reducing the risk of over-reliance on a single energy source and improved security and diversity of energy supply to Europe and Turkey
- Access to gas produced in the Caspian Region
- Potential future gas supply from the Eastern Mediterranean, Central Asia and Middle East

The TAP pipeline route is illustrated in Figure 1 and described below.



Figure 1: TAP Pipeline Route

Starting at the border of Greece and Turkey, where it connects with the Trans Anatolian Pipeline (TANAP), TAP crosses Northern Greece, Albania and the Adriatic Sea to southern Italy, where it connects to the Italian gas transportation grid. The TAP project represents the final stage in the development of the Southern Gas Corridor, traversing 6 countries and 3,500 km.

The initial capacity of TAP is 10 billion cubic metres (bcm) of gas per year with a potential overall capacity of 20 bcm following the installation of necessary additional equipment and infrastructure (e.g. additional compressor stations).

1.1 Scope

This document is applicable to the following TAP AG owned and operated facilities in Greece, Albania and Italy:

- Pipeline right of way (550 km) from the border between Greece and Turkey in Kipoi up to the border between Greece and Albania, including the compressor station at Kipoi and 23 block valve stations

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- Pipeline right of way (215 km) from Qendër, Bilisht in Korçë to 17 km north-west of Fier, approximately 400 m inland from the shoreline, the compressor station near Fier, the metering station near Bilisht, 8 block valve stations and 1 landfall valve station
- Pipeline right of way (105 km) pipeline traversing the Adriatic Sea to the Italian coast, the micro-tunnel site near the town of San Foca, the landfall valve station, the pipeline right of way (8.2 km), Pipeline Receiving Terminal (PRT) and back-up control centre in Brindisi
- TAP AG offices in Switzerland and TAP pipeline host countries

This document applies to TAP AG and Operation and Maintenance (O&M) contractors undertaking work within TAP AG operational facilities listed above.

1.2 Purpose

The purpose of this Environmental and Social Management Manual (ESMM) is to:

- Provide an overview of the environmental, social and cultural heritage (ESCH) standards applicable to TAP's operations
- Document how operational ESCH risks are managed to conform with applicable TAP performance standards
- Outline the organisational structure, key roles and responsibilities associated with ESCH management
- Define TAP AG internal and external ESCH reporting requirements.

The ESMM provides an overview of the processes to be employed to implement the mitigation hierarchy; identify, avoid, mitigate and manage ESCH risks.

1.3 Abbreviations and Definitions

Abbreviations

AGI	Above ground installation
bcm	Billion cubic meters
BMP	Biorestitution Management Plan
BOMP	Biodiversity Offsets Management Plan
CEMS	Continuous Emission Monitoring System
CTA	Common Terms Agreement, being the TAP Finance Document that contains the primary Environmental and Social obligations that TAP AG owes to its lenders and include Environmental and Social Action Plan (ESAP)
EBRD	European Bank of Reconstruction and Development
EIB	European Investment Bank
EP	Equator Principles
ESAP	Environmental and Social Action Plan



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ESCH	Environment, Social and Cultural Heritage
ESIA	Environmental and Social Impact Assessment
ESMM	Environmental and Social Management Manual
ETS	Emission Trading Scheme
GIP	Good Industry Practice
HGA	Host Government Agreement
HSE	Health Safety Environment
IED	Industrial Emissions Directive
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IFI	International Finance Institution
IGA	Intergovernmental Agreement
ITT	Invitation to Tender
km	kilometre
LATS	Livelihood Assistance and Transitional Support
LEA	Land Easement and Acquisition
MoC	Management of Change
NC	Non-Conformance
NCR	Non-Conformance Reporting
NG	Net Gain
NNL	No Net Loss
O&M	Operations and Maintenance
PCI	Project of Common Interest
PECI	Project of Energy Community Interest
PIMS	Project Information Management System
PRT	Pipeline Receiving Terminal



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PRAP	Productivity Restoration Action Plan
QHSE	Quality, Health, Safety and Environmental
SLIP	Supplementary Lender Information Package
SRG	Snam Rete Gas
TAP	Trans Adriatic Pipeline
TAP AG	Trans Adriatic Pipeline AG
TANAP	Trans Anatolian Pipeline
TEN-E	Trans-European Energy Infrastructure

Definitions

Contractor(s)	TAP operations and/or maintenance contractor(s)
Compliance Standards	As defined in the CTA: Means all applicable laws and regulations, the Environmental and Social Requirements and Good Industry Practice.
ISO 14001:2015	Environmental Management Systems – Requirements with Guidance for Use
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 may occur as a result of TAP operational activities. Impacts may be considered to be positive or negative.
Environmental and Social Action Plan	As defined in the CTA: Means the plan of environmental and social mitigation and improvement measures dated 27 November 2018 set out in Schedule 18 of the CTA (as may be amended from time to time)
Environmental and Social Incident	As defined in the CTA: Means an incident or accident relating to the Project which has the following impacts in any of the categories specified: (a) on health and safety: death, major disability or serious health damage; or (b) on society: destruction of a site or object of cultural or religious significance or serious social conflict or civil unrest or worker-related protest within the community; or c) on the Environment: serious, or material and persistent damage to the Environment or material breaches of Environmental and Social Requirements
Environmental and Social Requirements	As defined in the CTA: Means: a) the Environmental and Social Standards;



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	<p>b) the Environmental and Social Laws;</p> <p>c) the Environmental and Social Licences;</p> <p>d) the Environmental and Social Action Plan;</p> <p>e) the Environmental and Social Impact Assessments; and</p> <p>f) the ESIA SLIP.</p>
Environmental and Social Standards	<p>As defined in the CTA:</p> <p>Means:</p> <p>(a) the IFC Environmental, Health and Safety (EHS) Guidelines (April 2007);</p> <p>(b) the IFC Performance Standards (January 2012);</p> <p>c) Performance Requirements 1 to 8 and 10 of the Performance Requirements dated May 2014 and related to EBRD's Environmental and Social Policy dated May 2014; and</p> <p>(d) the EIB Environmental and Social Principles and Standards (2013),</p> <p>in each case, as applicable to the Project.</p>
ESIA SLIP	<p>As defined in the CTA:</p> <p>Means each document contained in the Environmental and Social Impact Assessment Supplementary Lender Information Package (including the TAP ESCH Management Plans) which are listed in Part 1 of Schedule 13 of the CTA.</p>
Good Industry Practice	<p>As defined in the CTA:</p> <p>Means the exercise of the degree of skill, diligence, care, prudence, foresight and operating practice which would reasonably and ordinarily be expected from a skilled, experienced and reasonable person engaged in the same type of undertaking as the Borrower under the same or similar circumstances.</p>
Remedial Action Plan	<p>As defined in the CTA:</p> <p>Means a plan to undertake such measures as may be necessary to remove, remedy, abate, contain, treat, ameliorate or otherwise render compliant any Environmental and Social non-compliance, which triggers an event of default under the CTA in each case which must specify, to the extent reasonably appropriate having regard to the applicable matter, time-bound actions (including a date by which the Borrower (i.e. TAP AG) reasonably believes that the relevant damage or breach that is the subject of the remediation shall be remedied or cured), targets and success criteria or objectives to be achieved in remedying the damage or breach (including any appropriate clean up levels and the methods to be adopted to ascertain such levels such as risk based corrective actions).</p>
Socio-economic impact	<p>A change to the existing socio-economic environment that occurs because of project activities. Social factors may include aspects such as demographics, health and well-being and may refer to individuals, groups or wider communities of people. Economic factors may include aspects such as employment, government or household finances, livelihoods. An impact may be positive or negative.</p>

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Stakeholder	Any person, group or organization who may be affected by or may affect TAP operations and may, in turn, affect operation.
TAP Finance Document	Means each of the agreements between TAP AG as borrower and various financing parties and supporting organisations as lenders (including the CTA)
Technical Consultant	As defined in the CTA: Means the technical consultant approved by the Intercreditor Agent and appointed to advise the Finance Parties from time to time.

1.4 Roles and Responsibilities

TAP AG organization, having its headquarters in Switzerland, includes roles such as the Operations Director, who shall support the roles and responsibilities presented below.

1.4.1 Operations and Maintenance Country Manager(s)

ESCH Management of hot commissioning activities, the introduction of hydrocarbons, and the operation and maintenance of TAP's pipeline systems in each host country has been delegated to the Operations and Maintenance Country Manager(s), who shall be responsible for:

- Ensuring compliance with and implementation of TAP AG standards and QHSE Management System, including applicable environmental, urban and land planning legislation, Lenders and ESIA requirements, implementation of practices for the prevention of pollution and management of waste, and operation of facility flood protection, drainage and runoff systems
- Cultural heritage management including protection of archaeological findings, coordinating compliance with and implementation of the laws for the protection of antiques
- Land Management and management of the pipeline Right of Way, including coordination of the lease, acquisition and management of required land, acquisition and management of relevant rights on land, their preservation, extension, renewal and termination
- Ensuring implementation of the ESCH Management Controls outlined in Section 3.2 of this ESMM
- Ensuring implementation of the ESCH Compliance Oversight and Assurance Framework outlined in Section 3.4 of this ESMM.

1.4.2 Corporate QHSE Manager

Specific responsibility for the implementation of the QHSE Management System and reporting on its effectiveness has been delegated to the Corporate QHSE Manager, who shall be responsible for:

- Developing and maintaining an operations QHSE management system that details how ESCH risks shall be systematically identified, assessed, avoided, mitigated and managed
- Ensuring that the QHSE Management System conforms to the requirements of ISO 14001 and to requirements of EMAS Regulations in Italy
- Acting as the management representative for QHSE Management System for EMAS in Italy
- Reporting on the performance of the QHSE Management System and opportunities for improvement to the TAP AG Board of Directors
- Ensuring that the integrity of the QHSE Management System is maintained when changes to the system are planned and implemented

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- Ensuring that TAP's processes are delivering their intended outputs and outcomes.
- Providing adequate and appropriate QHSE resources for implementation of the QHSE management system
- Providing the operations leadership team and functional leaders with QHSE management system advice, guidance and assurance
- Promoting the standardisation and simplification of QHSE management system plans, processes and procedures
- Developing and managing a budget for the QHSE management system team and ensuring that QHSE management system team activities are effectively conducted within the constraints of the budget.
- Review and update of this ESMM to ensure consistency with the TAP AG operations.

1.4.3 Land Management Lead

The Land Management Lead shall be responsible for:

- Completion of livelihood restoration program and evaluation and close out for all project affected land
- Completion of bio-restoration and biodiversity offset program
- Implementation of Grievance Management Procedure
- Land management activities to support infringement resolution and land entry
- Integrating stakeholder engagement initiatives from the landowner/user engagement, grievance management and livelihood restoration programs
- Providing feedback to the stakeholder engagement team on the outcome of engagement meetings that are relevant to inform adaptation of TAP's stakeholder engagement programs
- Supporting the QHSE team to ensure ESCH compliance of the operating facilities

1.4.4 QHSE Officers

The QHSE Officer(s) at each operational facility shall support the implementation of the TAP ESCH performance standards and shall be responsible for:

- Monitoring Contractors' compliance with contractual ESCH requirements (e.g. waste control procedure, pollution prevention procedure, etc.)
- Performing ESCH incident investigation and reporting, where needed
- Provision of technical ESCH advice to TAP AG operations
- Facilitation of ESCH assurance activities
- Reporting on ESCH compliance and corrective action implementation

1.4.5 Industrial Relations Advisor

TAP Industrial Relations Advisor shall be responsible for:

- Monitoring O&M Contractors' compliance to contractual obligations with respect to industrial relations management, industrial relations standards and alignment with legislative requirements
- Conducting regular industrial relations compliance monitoring and auditing as per the agreed Audit Schedule.



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- Facilitating and attending Industrial Relations Management Committee (IRMC) meetings to review TAP AG activities, challenges and achievements and to provide consultation as required to Operations and Maintenance Country Manager(s)
- Facilitating the Country Industrial Relations / Contractor Management Forum meetings
- Analysing the performance provided by the O&M Contractors and providing input/data to IRMC
- Ensuring strategic and holistic review of the current industrial relations management environment is shared with Operations and Maintenance Country Manager(s)
- Supporting the Operations Director in managing the interface for any TAP AG press statement or media releases which relate to Industrial Relations disputes.
- Ensuring Contractors notify TAP AG of any form of potential Industrial Relations management disruption and confirming the Contractor has adequate response plans and processes in place.

1.4.6 O&M Contractor(s)

TAP O&M Contractors shall be responsible for:

- Acting in accordance with the relevant Maintenance contract and this ESMM
- Ensuring full compliance by all personnel and subcontractors with the provisions of this ESMM and applicable national legal requirements.

The specific roles and responsibilities for implementation of each of the ESCH management documents listed in Table 1 below are detailed within each individual document.

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2. References

Document ID	Document Title
CAL00-TAP-QHSE-X-TVO-0001	TAP QHSE Policy
CAL00-TAP-QHSE-X-TMQ-0002	QHSE Management System Manual
CAL00-TAP-COL-X-TVO-0001	TAP Code of Conduct
CAL00-TAP-QHSE-X-TPA-0020	HSE Legal Compliance Procedure
GAL00-ENT-642-Y-TAE-0001	Environmental and Social Impact Assessment (ESIA) for Greece
AAL00-ENT-641-Y-TAE-0001	Environmental and Social Impact Assessment (ESIA) for Albania
IAL00-ERM-643-Y-TAE-1011	Environmental and Social Impact Assessment (ESIA) for Italy
CAL00-TAP-QHSE-Y-TMT-0002	TAP Operations Environmental Standards Manual
CAL00-TAP-QHSE-X-TPA-0006	QHSE Training Procedure
CAL00-TAP-QHSE-X-TPA-0002	Non-Conformity Management Procedure
CAL00-TAP-QHSE-Y-TPA-0001	Pollution Prevention Procedure
CAL00-TAP-QHSE-Y-TPA-0007	Waste Management Procedure
CAL00-TAP-QHSE-Y-TPA-0003	Atmospheric Emissions Management Procedure
CAL00-TAP-QHSE-X-TPA-0008	QHSE Incident Reporting and Investigation Procedure
CAL00-TAP-FIN-X-TPA-0005	Change Management Procedure
CAL00-TAP-LEG-X-TPA-0001	Records Retention Guidelines

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3. ESCH Management

This Environmental and Social Management Manual (ESMM) is a component part of the TAP AG integrated QHSE Management System, which aims to ensure sustainable business activities throughout the TAP AG organisation. Figure 2 presents the ESCH management process that has been implemented to maintain the system’s appropriateness and effectiveness.

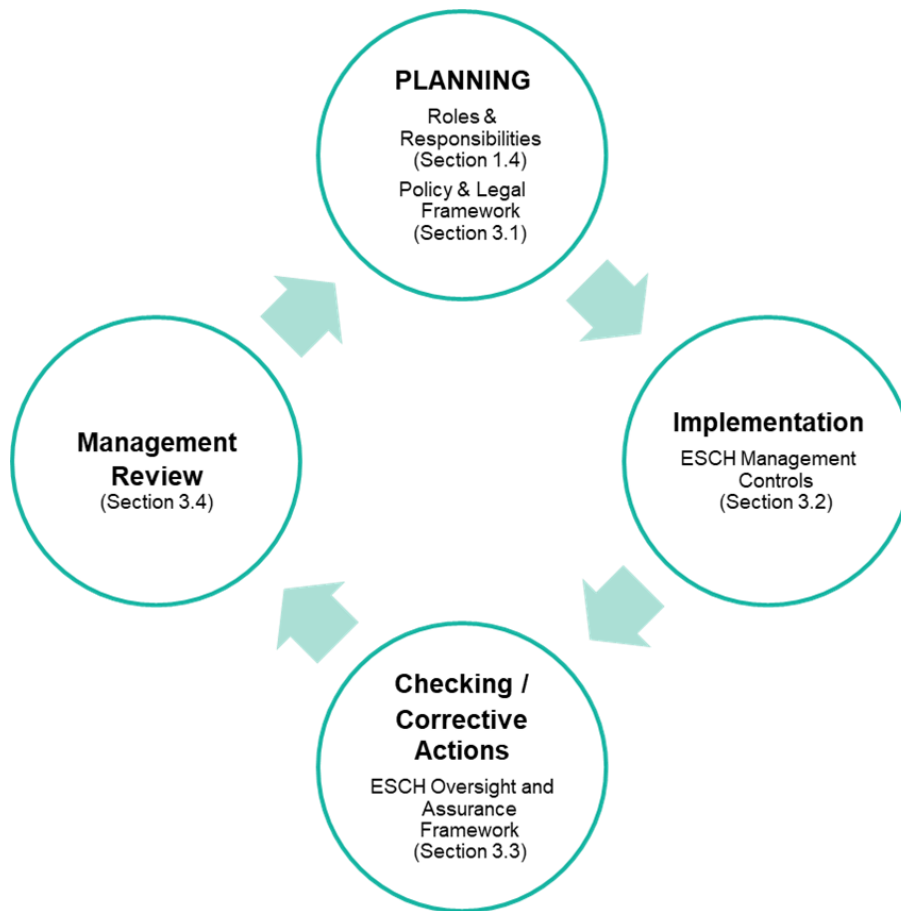


Figure 2: ESCH Management Process

3.1 Policy and Legal Framework

TAP AG operations shall be performed in line with applicable EU and national environmental legislation, the commitments within TAP ESIs (and any amendments thereto) approved by national authorities, the TAP AG QHSE Management System, including this ESMM and TAP AG performance standards.

3.1.1 TAP QHSE Policy

TAP’s mission and vision encompass its role in opening the Southern Gas Corridor into Europe, as well as its contribution to a sustainable energy future. TAP provides a cost-effective, energy efficient, safe and sustainable energy transportation route, while supporting local communities and benefitting the wider region.

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In pursuit of this vision, TAP follows an integrated approach to managing risks and opportunities. Being aware of its responsibilities and duties towards its shareholders and stakeholders, TAP AG is committed to internationally recognized quality, health, safety, environment and energy efficiency standards and the use of best practice and in acting in an ethical and socially responsible manner and operating with safety and sustainable practices, including reducing energy consumption and promoting energy efficiency.

TAP AG has developed and committed to a QHSE Policy aligned to internationally recognised quality, health, safety and environmental standards and to the use of industry best practice. TAP AG ambition is to avoid negative impacts where possible, enhance positive effects and contribute to sustainable development.

The QHSE policy applies to all activities of TAP from conceptual design and construction to operations; its principles apply to all personnel working for TAP. As a rule, TAP will aim at agreeing with relevant TAP contractors and suppliers that they abide by this policy.

TAP AG shall implement its integrated management system via compliance with the QHSE Management System Manual, processes, procedures and work instructions as the primary means of deploying these principles into its everyday working practices, at all levels and locations of TAP AG organisation

3.1.2 Code of Conduct

TAP AG Code of Conduct is designed to preserve and foster the integrity and reputation of TAP AG and to ensure TAP AG avoids misconduct. This means TAP AG shall ensure compliance with legal and regulatory requirements as well as with its internal policies and directives, while upholding good market practices at all times.

TAP AG is committed to acting in an ethical and socially responsible manner and within the laws, customs and traditions of the countries in which it operates.

The Code of Conduct applies to the TAP AG organisation and its individual employees, board members, third parties and others who act on TAP AG's behalf. These third parties include contractors, suppliers, agents, intermediaries, lobbyists, consultants and advisors.

3.1.3 Host Country Constitutions

The constitutions of Greece, Albania and Italy are the highest laws of their respective countries and prevail over national legislation and international agreements. They stipulate the following:

- Greece:

“The protection of the natural and cultural environment constitutes a duty of the State and a right of every person. The State is bound to adopt special preventive or repressive measures for the preservation of the environment in the context of the principle of sustainable development”. “Work constitutes a right and shall enjoy the protection of the State, which shall care for the creation of conditions of employment for all citizens”, and “general working conditions shall be determined by law, supplemented by collective labour agreements concluded through free negotiations and, in case of the failure of such, by rules determined by arbitration”

- Albania:

- Requires the state to maintain *“a healthy and ecologically adequate environment for the present and future generations”*
- Regarding labour: *“everyone has the right to earn the means of living by lawful work that has chosen or accepted himself. He is free to choose his profession, workplace and system of its own professional qualification. Employees have the right of social protection of labour”*

- Italy:

- It is required that the Republic *“safeguards the natural landscape and the historical and artistic heritage of the Nation”*

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- *“The Republic recognises the right of all citizens to work and promotes those conditions which render this right effective”*

3.1.4 Host Government Agreements

TAP AG has agreed the framework by which the project shall be realized and operated on Greek and Albanian territories in the form of Host Government Agreements (HGA) with the Greek and Albanian Governments, respectively. This framework includes, among others, provisions relating to processes on land easement and acquisition, the implementation of technical, safety, environmental and social standards and permitting. The HGA for Albania and Greece include, among others¹:

- The key Environmental, Social, and Community Health and Safety Standards which TAP AG is expected to follow
- The required key permits
- The Parties obligations towards each other including provisions regarding the States’ obligations to facilitate TAP AG’s activities, if/when necessary, as described in respective provisions
- The process for obtaining the necessary land rights for the TAP pipeline

In Greece, the HGA has been ratified with Greek law 4217/2013. In Albania, the HGA has been ratified with Albanian Law 116/2013.

3.1.5 Intergovernmental Agreement

The Intergovernmental Agreement (IGA) between Italy, Greece and Albania reinforces a range of key commitments to the forward development, construction and operation of the TAP pipeline. The IGA aims to ensure that the states cooperate on the timely delivery and efficient operation of the TAP pipeline and requires that a coordinated and uniform set of standards, including environmental and social standards, apply across the operations. The IGA has been ratified by the Italian, Greek and Albanian Parliaments.

3.1.6 HSE Legal Compliance

TAP AG QHSE Function, in collaboration with specialised external provider have identified the HSE legal requirements applicable to TAP’s activities and facilities that includes:

- At European level: directives, decisions and regulations published in the Official Journal of the European Community
- At the national level: laws, decrees, regulations etc. published in the official bulletins
- At the regional level: laws, decrees, regulations etc. published in the official bulletins
- At the local level: local ordinances published in the local boards.

Regulatory HSE compliance is managed in accordance with HSE Legal Compliance Procedure. The database is updated periodically (varying depending on the country) to ensure it remains reliable and current.

TAP AG QHSE Function shall facilitate an assessment of compliance with the applicable legal requirements and communication of updates within the TAP AG organisation.

¹ Only the provisions relevant to environment and social matters are mentioned

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3.1.7 TAP ESIA

TAP AG operations shall be performed in line with TAP ESIA for Albania, Greece and Italy (and subsequent amendments thereto, where applicable) approved by national authorities in line with terms and conditions specified within the approval decisions:

- TAP Greece ESIA and Approval of Environmental Terms by Ministry of Environment and Climate Change - Decision No 174848
- TAP ESIA Albania and Environmental Permit issued by Ministry of Environment, Forest and Water Administration - Decision No 3 dated 03.05.2013
- TAP Italy ESIA and ESIA Approval Decree No 223 by Ministry of the Environment and Protection of Land and Sea, EIA Screening Decree (Directorial Decree No 116/2018) and EIA Screening Decree (Directorial Decree No 327/2019).

3.1.8 Performance Standards

The TAP pipeline is a critical component of Europe's strategy for energy security and diversity. Gas supply reduces reliance on coal for energy and is considered a transitional step towards a low-carbon economy. TAP AG, the company responsible for the gas transport infrastructure, has implemented good international practices throughout the design and construction of the pipeline and continues to align with the standards of international financial institutions such as:

- The EBRD Performance Requirements (PRs 1 through 6, 8 and 10)² as per EBRD's Environmental and Social Policy (2014)
- The EIB Environmental and Social Practices and Standards (2013)
- The IFC Performance Standards (PS 1 through 6 and 8)³ (January 2012)
- The IFC EHS General Guidelines (2007)
- The IFC Industry-specific Guidelines
 - The IFC EHS Guidelines for Onshore Oil and Gas Development (2007)
 - The IFC EHS Guidelines for Offshore Oil and Gas Development (2015)
- The Equator Principles III (2013)
- The OECD Common Approaches (2012)

TAP AG complies with and demonstrates Good Industry Practice (GIP) as described in the Common Terms Agreement (CTA).

TAP AG has developed the TAP Operations Environmental Standards Manual which details the performance standards derived from the applicable legislation requirements and standards and principles listed above. Whenever applicable, the most stringent requirement was considered in setting TAP Operations Environmental Standard.

3.2 ESCH Management Controls

The TAP QHSE management system is aligned with the requirements of ISO14001:2015, the International Organisation for Standardisation's (ISO) specification for environmental management systems. ISO14001 is an

² EBRD PR 7 is a performance requirement in relation to Indigenous Peoples and is not applicable to TAP. EBRD PR 9 is a performance requirements for financial intermediaries and is not applicable to TAP

³ IFC PS 7 is a performance standard in relation to Indigenous People and is not applicable to TAP

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internationally recognised standard for managing environmental responsibilities in a systematic manner to achieve good environmental performance. The ESMM is the central document of TAP QHSE Management System. Figure 3 provides an overview of the TAP QHSE Management documents, whilst Table 1 summarises the main topics addressed by each ESCH management document.

TAP AG activities are performed in accordance with the ESIA's and the decisions approving such ESIA's in each respective country, along with any amendments thereto.

TAP AG QHSE Management System Documents, including this ESMM, contain requirements in addition to any legal requirements applicable to TAP AG (arising from national and/or EU legislation and the ESIA approvals in place), and therefore no such provision has any effect whatsoever on the fulfilment of these legal obligations by TAP AG. This document includes additional requirements formulated by, and incumbent on, TAP AG and, therefore, does not give any right to third parties and are not enforceable by any third party beyond any legal rights they may have in accordance with applicable laws.

TAP ESCH management controls described in the following sections are designed to deliver implementation of ESCH management as described in this ESMM. The core areas of ESCH management during the operations phase are presented in Figure 4.



Figure 3: QHSE Management System

Table 1: TAP ESCH Management Documents

No	ECHS MD	Issues covered
Level 2 Manuals		
1	Environmental and Social Management Manual	<ul style="list-style-type: none"> • Overview of the environmental, social and cultural heritage (ESCH) standards applicable to the TAP Operations • Organisational structure and key roles and responsibilities • ESCH Management Controls • ESCH external reporting requirements.
2	TAP Operations Environmental Standards Manual	<ul style="list-style-type: none"> • Operational environmental standards derived from applicable international and national legislation, requirements of the approved ESIA's, lending institutions and TAP corporate policies and commitments
Level 3.1 General Procedures		
3	Waste Management Procedure	<ul style="list-style-type: none"> • Waste hierarchy (i.e. reduction at source, reuse, recycling, energy recovery, responsible disposal) and waste minimisation • Identification and classification of waste • Waste register • Waste handling (i.e. collection, segregation and containers, storage, treatment, transport and documentation, disposal) • Monitoring and reporting.
4	Pollution Prevention Procedure	<ul style="list-style-type: none"> • Identifies controls for prevention of pollution • Details monitoring programme for wastewater, groundwater, light and noise
5	Land Entry Procedure	<ul style="list-style-type: none"> • Livelihood restoration, biodiversity and cultural heritage consideration for various scenarios where entry to the pipeline RoW is required during operations • Internal and external notification and engagement • Management of planned and unplanned impacts • Restoration and land exit
6	Infringement Management Procedure	<ul style="list-style-type: none"> • Defines restrictions imposed on land • Identification, monitoring and reporting of infringements • Planning and implementation of corrective actions
7	Atmospheric Emissions Management Procedure	<ul style="list-style-type: none"> • Defines the strategy and management of atmospheric emissions • Covers direct and indirect GHG emissions (scope 1 and 2 as per GHG protocol) • Specifies quantification methodology • Details GHG monitoring programme and public GHG reporting commitments • Consolidates subordinate documents that cover discrete emission

No	ECHS MD	Issues covered
		<p>reporting and management issues</p> <ul style="list-style-type: none"> • Details a procedure on how fugitive emissions shall be managed and monitored during the operations phase, including details of the Leak Detection and Repair (LDAR) programme
8	Grievance Management Procedure	<ul style="list-style-type: none"> • Framework for all third-party grievance management • Defines process of managing and resolving grievances • Provides timeframes for resolution and processes for escalation • Grievance classifications and definitions • Defines reporting and monitoring requirements
9	Stakeholder Engagement Procedure	<ul style="list-style-type: none"> • Overarching framework for all stakeholder engagement related activities • Stakeholder identification • Stakeholder engagement programme • Monitoring and reporting
10	Industrial Relations Management Procedure	<ul style="list-style-type: none"> • The development and application of effective tools and processes reflective of workers' rights to minimise employee management risks, work disruption, and associated impacts on costs, schedule and delivery of the TAP product • Training and skills development activities • Employee grievance mechanism • Monitoring and reporting
11	Waste and Resource Consumption Minimisation Procedure	<p>Provide practical guidance on:</p> <ul style="list-style-type: none"> • sustainable consumption patterns for better use of natural resources • prevention of waste generation at source
12	Environmental Performance Data Management Procedure	<ul style="list-style-type: none"> • Management system requirements for environmental performance data • Defines roles and responsibilities for environmental performance data collection, validation, recording and reporting • Data management processes, template and storage requirements.
Level 3.2 Specific Procedures		
13	Emissions management under ETS Procedure	<ul style="list-style-type: none"> • Covers direct carbon dioxide (CO₂) emissions from the combustion of fossil fuels in TAP's facilities, which are under the scope of the EU ETS. • Establishes the methodology to manage the greenhouse gas emissions under the scope of the EU ETS to comply with current legal obligations
14	Reporting and Calculation of NO _x , SO _x and CO Emissions Procedure	<ul style="list-style-type: none"> • Describes the methodology for calculating and reporting NO_x, SO_x, and CO emissions, including data calculation requirements

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No	ECHS MD	Issues covered
15	Country Specific Livelihoods Restoration Procedures	<ul style="list-style-type: none"> • Process implemented to ensure that adverse impacts on people, their rights, livelihoods, culture and environment are avoided or, where avoidance is not possible, minimised, mitigated, offset and/or compensated • Defines process of land easement and acquisition (LEA) • Defines process implemented to avoid, manage, mitigate, minimise the impacts of LEA activities on people, their rights, livelihoods, culture and environment • Defines how livelihoods will be restored and monitoring and evaluation required in order to determine completion of restoration.
16	Country Specific Cultural Heritage Management Plans	<ul style="list-style-type: none"> • Framework for cultural heritage management, monitoring and reporting • Define chance find procedure • Identify cultural heritage constraints from construction phase of the project
Project Documents applicable to TAP Operations		
17	Biodiversity Offsets Strategy	<ul style="list-style-type: none"> • Presents strategy on how any unavoidable significant residual impacts to biodiversity features can be compensated through the establishment of biodiversity offsets that achieves an overall net gain or no net loss (NG/NNL) in biodiversity
18	Bio-restoration Management Plan	<ul style="list-style-type: none"> • Bio-restoration Planning • Bio-restoration Execution • Monitoring, maintenance and aftercare
19	Ecological Management Plan	<ul style="list-style-type: none"> • Overarching biodiversity management control document • TAP biodiversity management system • Biodiversity identification, management, monitoring and restoration
20	Critical Habitats Assessment	<ul style="list-style-type: none"> • Technical assessment of the extent of critical habitats relevant to the TAP project based on a set of qualifying criteria established by the performance requirements and standards of three financial institutions
21	Supplementary Ecological Assessment	<ul style="list-style-type: none"> • A whole-of-project biodiversity baseline, updated to include the results of surveys and monitoring carried out since completion of the individual host country ESIA's • Provides information to enhance the host country ESIA's, including the identification of critical habitat, priority biodiversity features, modified vs. natural habitats, etc. • Updates information from the host-country ESIA's in relation to legally protected and/or internationally designated areas (this is particularly applicable in Albania, where the protected areas network is currently subject to review and revision) • Assesses the residual impacts on biodiversity features (i.e. critical and



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No	ECHS MD	Issues covered
		natural habitats, and priority biodiversity features) as a result of the project, after the mitigation hierarchy has been applied. Based on this biodiversity impact assessment, biodiversity features requiring management shall be identified
22	Soil Erosion and Reinstatement Plan	<ul style="list-style-type: none"> • Defines soil erosion controls and associated standards and monitoring • Temporary and permanent erosion control measures • Inspection and maintenance programme • Reinstatement and revegetation measures
23	BOMPs	<ul style="list-style-type: none"> • Individual BOMPs developed in line with Biodiversity Offsets Strategy detail the actions required to successfully implement and monitor the forest compensation and biodiversity offset actions at individual biodiversity offset sites
Level 5 Method Statements		
24	Method Statement Wastewater Sampling	<ul style="list-style-type: none"> • Details of monitoring equipment, standard sampling procedures, recordkeeping and action triggers.
25	Method Statement Groundwater Sampling	<ul style="list-style-type: none"> • Details of monitoring equipment, standard sampling procedures, recordkeeping and action triggers.
26	Method Statement Light Monitoring	<ul style="list-style-type: none"> • Details of monitoring equipment, standard sampling procedures, recordkeeping and action triggers.
27	Method Statement Noise Monitoring	<ul style="list-style-type: none"> • Details of monitoring equipment, standard sampling procedures, recordkeeping and action triggers.
28	Method Statement Ambient Air Quality Sampling	<ul style="list-style-type: none"> • Details of monitoring equipment, standard sampling procedures, recordkeeping and action triggers.
29	Method Statement CEMS System Reading and Emissions from Stack	<ul style="list-style-type: none"> • Details of monitoring equipment, standard sampling procedures, recordkeeping and action triggers.



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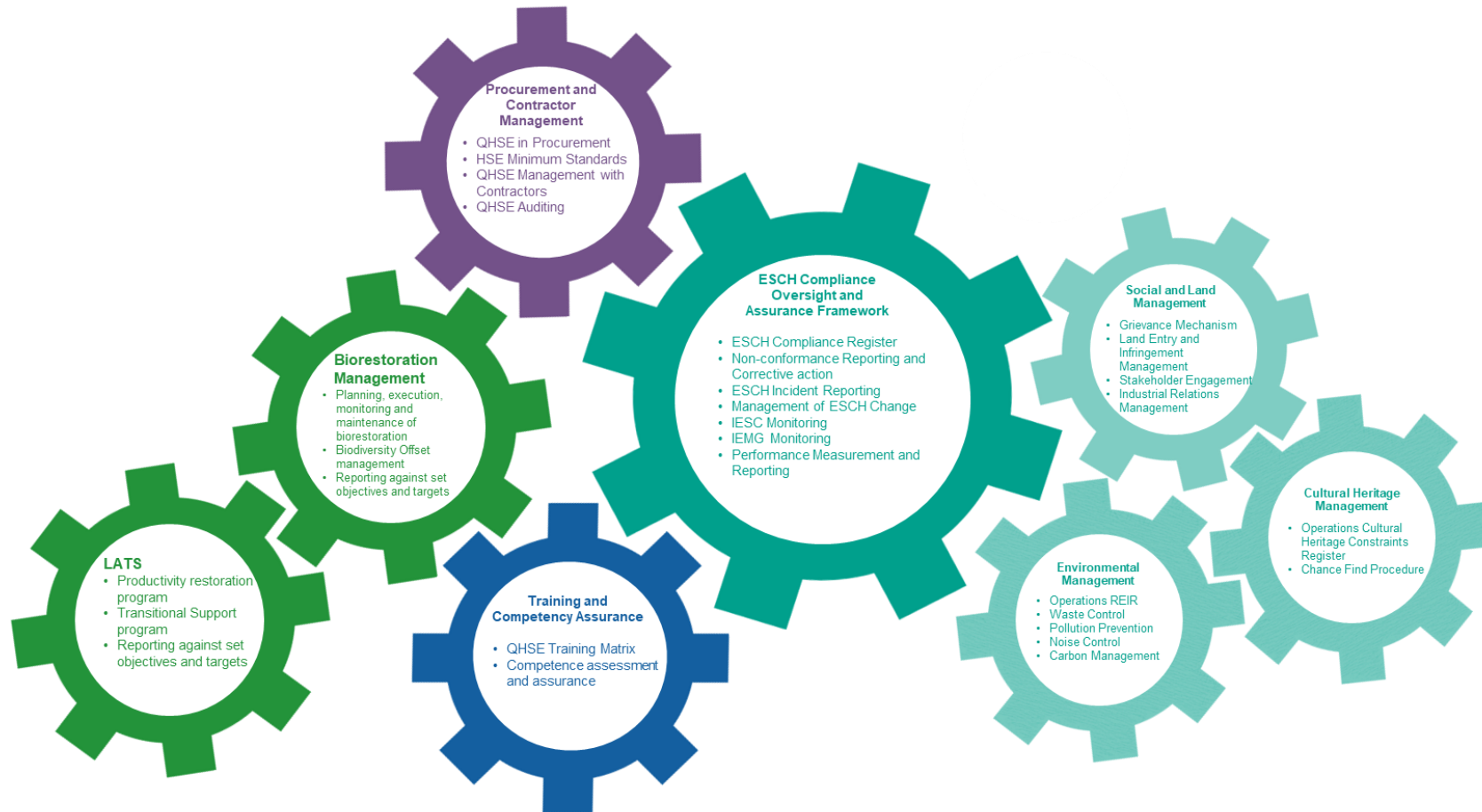


Figure 4: ESCH Management Controls

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3.3 ESCH Training and Competency

ESCH training is delivered as part of the TAP AG QHSE induction course for all personnel and is supplemented with worksite specific QHSE training in line with the QHSE Training Procedure. ESCH topics include:

- Code of conduct
- Minimisation of resource consumption (e.g. water, electricity, etc.)
- Wildlife and habitat protection and general site practices to safeguard ecological resources
- Local specific constraints and risks
- Hazardous material handling, spill prevention and reporting
- Known cultural heritage constraints and chance find reporting
- Control of nuisance
- Land access and community interaction
- TAP livelihood and biodiversity restoration activities
- Grievance reporting
- Waste minimisation and management

For each position, a set of QHSE mandatory training requirements has been defined within the QHSE Training Matrix (Appendix 2 to QHSE Training Procedure). The matrix is subject to annual review by TAP AG's QHSE Committee.

TAP has established a portfolio of web based QHSE training courses, both adapted from existing materials in the oil and gas industry and as custom-made courses specific to TAP's QHSE standards and procedures. A number of these courses are mandatory for all employees and completion is linked to the personnel assessment process.

Competence assurance is implemented in several ways (but is not limited to):

- Interactive classroom training to check understanding of participants
- Practical exercises, in addition to theoretical training
- Examination at the end of web-based courses
- Choice of external training providers who satisfy national or international competence standards
- Defining personal and non-technical attributes in addition to qualification and experience requirements in job vacancies and selecting candidates based on these criteria
- Defining qualification and experience requirements for key HSE personnel provided by contractors.
- E-learning courses and associated evaluation of understanding

TAP AG monitors and evaluates the efficiency and timely delivery of training, including to ensure that those with responsibilities for environmental and social performance are suitably qualified and trained.

Contractors are obligated in line with their respective agreements to ensure that Contractor personnel are suitably qualified, competent and fit for their tasks.

3.4 ESCH Compliance Oversight and Assurance Framework

TAP AG's ESCH compliance oversight and assurance framework is a verification mechanism that TAP AG as an organisation will implement to verify that the work planned and performed is conducted according to TAP AG's ESCH performance standards and QHSE management system as a whole. The framework is based on a range of tools and processes adopted by TAP AG to manage, monitor, measure and report ESCH compliance of TAP

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AG activities during the operational phase of TAP facilities. O&M Contractors are obligated in line with their respective agreements to implement respective tools/systems, monitored through TAP AG's contractor management system.

Three key processes within ESCH oversight and assurance framework are:

- Non-conformance reporting
- Incident reporting and investigation
- Management of ESCH change
- Monitoring and reporting

These processes shall be implemented in parallel with ongoing ESCH monitoring and reporting and are detailed further in the following Sections 3.4.1– 3.4.4.

3.4.1 Non-Conformance Reporting and Further Actions

TAP has established a non-conformance management system, as documented in the Non-Conformity Management Procedure.

ESCH Non-conformances are:

- TAP Non-conformances that are deviations from internal TAP ESCH requirements that have not been approved by TAP. These are typically identified through the oversight and assurance processes required under:
- Section 3.7 of Pollution Prevention Procedure
- Section 3.4.4 of Waste Management Procedure
- Section 3.6 of Atmospheric Emissions Management Procedure
- Deviations from CTA Environmental and Social Requirements are managed as per the requirements of the CTA.

Categorisation of ESCH non-conformances shall be based on the 5-level severity scale in line with TAP Incident Severity Matrix (Appendix 3 of QHSE Incident Reporting and Investigation Procedure) as shown in Table 2 below. The highest potential severity description within Table 2 shall be selected to classify non-conformances.

All non-conformances shall be recorded in the TAP action tracking system within the Project Information Management System (PIMS), detailed within in Non-Conformity Management Procedure.

Table 2: Non-conformance Categories and corrective actions

NC Category	Incident Severity Matrix Rating	Corrective Action Level
1	1 (Negligible)	Corrective or preventive action or site-specific attention to ensure compliance with QHSE Management System, TAP and Contractor Management documentation
2	2 (Moderate)	Corrective or preventive action or site-specific attention to ensure compliance with QHSE Management System, TAP and Contractor Management documentation
3	3 (Significant)	Corrective action or site-specific attention to rectify or stop the on-going non-conformance and/or to prevent the occurrence of environmental and social impacts



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NC Category	Incident Severity Matrix Rating	Corrective Action Level
4	4 (Severe)	Immediate corrective action or site-specific attention required to rectify or stop the on-going non-conformance and to implement mitigation
5	5 (Critical)	Immediate corrective action required to rectify or stop the on-going non-conformance and to implement mitigation

3.4.2 ESCH Incident Reporting and Investigation

TAP Incident management and associated reporting are addressed by QHSE Incident Reporting and Investigation Procedure.

Under the CTA an E&S incident is defined as:

“an incident or accident relating to the Project which has the following impacts in any of the categories specified:

- (a) on health and safety: death, major disability or serious health damage; or*
- (b) on society: destruction of a site or object of cultural or religious significance or serious social conflict or civil unrest or worker-related protest within the community; or*
- (c) on the Environment: serious, or material and persistent damage to the Environment or material breaches of Environmental and Social Requirements”.*

Classification of ESCH incidents shall be based on the 5-level severity scale in line with Incident Severity Matrix (Appendix 3 to QHSE Incident Reporting and Investigation Procedure) which includes recognition of the habitat classification type and assigns incident severity into three categories as shown in Table 3.

Table 3: Environmental Sensitivity

Highly sensitive environment	Medium sensitive environment	Non-sensitive environment
Protected areas European Priority Habitat Critical habitat (as defined in TAP Critical Habitats Assessment)	Potential Biodiversity Features (natural and semi natural habitats)	All other habitats

Table 4 presents how TAP incident categories are classified using the CTA definitions. All health, safety and security incidents shall be classified and reported as per the QHSE Incident Reporting and Investigation Procedure.

Table 4: ESCH Incident Definitions and Reporting Criteria under TAP CTA

Definition as per TAP CTA	TAP Equivalent as per Incident Severity Matrix	Key Considerations
Death, major disability or serious health damage	Any injury or illness incident of Category 3 (Significant), Category 4 (Substantial) or Category 5 (Critical)	

Definition as per TAP CTA	TAP Equivalent as per Incident Severity Matrix	Key Considerations
Destruction of a site or object of cultural or religious significance	Any cultural heritage incident of Category 3 (Significant), Category 4 (Substantial) or Category 5 (Critical)	
Serious social conflict, civil unrest and worker related protests within the community	Any social incident of Category 3 (Significant), Category 4 (Substantial) or Category 5 (Critical)	The threshold at which civil conflict or unrest is considered serious is an event that involves police intervention and results in those involved in the event being taken into custody by the police.
Serious, or material and persistent damage to the Environment	Any environmental incident of Category 3 (Significant), Category 4 (Substantial) or Category 5 (Critical)	
Material breaches of Environmental and Social Requirements	Any social incident of Category 3 (Significant), Category 4 (Substantial) or Category 5 (Critical)	Materiality of the breach shall be determined on case by case basis (e.g. any breach of a regulatory consent condition that has or may potentially result in administrative or criminal proceedings is material). TAP AG Legal to be consulted where necessary.

3.4.3 Management of ESCH Change

This ESMM section refers to the process of managing ESCH changes and integrates into the TAP Change Management Procedure applicable to all changes (e.g. technical, schedule, financial etc.)

This Section 3.4.3 is the Environmental and Social Management of Change Procedure, as defined in TAP's Finance Documents.

The scope of this Section is limited to setting out the agreed process for making amendments to:

- Each Environmental and Social Impact Assessment and ESIA SLIP (each as defined in TAP's Finance Documents) and any other document that is expressly referred to in TAP's Finance Documents as being subject to amendment in accordance with the Environmental and Social Management of Change Procedure (together, the "MOC Documents"); and
- The route or design of the Pipeline from that reviewed by the Technical Consultant (as defined in TAP's Finance Documents) for the purposes of its report that was delivered as a condition precedent to financial close of TAP's project financing

ESCH changes covered by this Section shall include the following types of change:

- Descriptions of activity and physical changes in operational scope or footprint as presented in the MOC Documents. These changes may include:
 - Descriptions of pipeline or AGI design and footprint changes (e.g. due to geotechnical, topographical, environmental, social etc. constraints) or changes to the pipeline route or design

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- Descriptions of new planned activities or technical processes with potential environmental and social impacts which were not previously considered in the MOC Documents
- Changes to commitments to monitor, manage, mitigate or avoid potential impacts set out in the MOC Documents, for example operational activity timing restrictions due to environmental or social sensitivities specified within the MOC Documents
- Changes to TAP ESIA SLIP

The ESCH change process is outlined in Sections 3.4.3.1 to 3.4.3.5 below.

3.4.3.1 Change Identification and Categorisation

An overview of the ESCH change process is provided below. The process shall be managed by TAP's ESCH team:

- ESCH changes are identified in several different ways, including requests by the Contractors, the TAP AG operations teams and an ESCH Change Form is produced to screen the change internally within TAP
- Once the ESCH Change Form is reviewed within TAP, changes are assessed and categorised in conjunction with the relevant functional teams
- The ESCH change assessment includes review of potential impacts prior to implementation of proposed mitigation. The impact assessment methodology presented in the country specific approved Environmental and Social Impact Assessments shall be used, the methodology defines impact severity (major, moderate and minor)
- A register of ESCH changes is maintained and reviewed monthly by the QHSE Officers

TAP shall classify ESCH changes into three categories:

Changes Category 1

- An operational change that may result in a potential new major impact that was not included in the relevant MOC Document or elevation of an impact assessed in the relevant MOC Document to a potential major impact category prior to mitigation or management
- Changes to commitments to mitigate or avoid potential impacts, specified within the relevant MOC Document that may result in a potential new major impact
- MOC Document changes that may result in a potential new major impact that was not included in the relevant MOC Document or elevation of an impact assessed in the relevant MOC Document to the major impact category prior to mitigation

Changes Category 2

- All pipeline route or pipeline design changes shall be considered a Category 2 change as a minimum.
- AGI design and footprint or activity change that may result in a potential new moderate impact not included in the relevant MOC Document or elevation of an impact assessed in the relevant MOC Document to the moderate potential impact category prior to mitigation or management
- Changes to commitments to mitigate or avoid potential impacts, specified within the relevant MOC Document that may result in a potential new moderate impact
- MOC Document changes that may result in a potential new moderate impact not included in the relevant MOC Document or elevation of an impact assessed in the relevant MOC Document to the moderate impact category prior to mitigation

Changes Category 3

- Changes which do not fall within either Category 2 or 1 and where potential impact of the change prior to mitigation shall be no more than minor

3.4.3.2 E&S Bank Engagement and Approval Process

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Any action expressed to be taken by the E&S Bank (as defined in TAP's Finance Documents) in this Section is to be taken by the E&S Bank in consultation with each of the European Investment Bank, the European Bank for Reconstruction and Development, Bpifrance Assurance Export, Euler Hermes Aktiengesellschaft and SACE S.p.A. (together, the IFIs and ECAs) and any action expressed to be taken by the E&S Bank, the IFIs or the ECAs in this Section may only be taken to the extent required to ensure compliance with the Environmental and Social Requirements (as defined in the TAP's Finance Documents).

3.4.3.3 Approval of Category 1 Changes

- TAP shall issue to the E&S Bank and the IFIs and ECAs all ESCH Category 1 ESCH Change Forms prior to implementation.
- If the IFIs and ECAs do not agree to the proposed change assessment and associated mitigation, they must notify the E&S Bank within 15 working days of TAP issuing the ESCH Category 1 Change Form. Following receipt of any such notification from an IFI or ECA, the E&S Bank shall, as soon as reasonably practicable but in any event within 20 working days of TAP issuing the ESCH Category 1 Change Form, provide a written refusal notice outlining the reason(s) for refusal with reference to relevant Environmental and Social Requirements.
- In the absence of a written refusal from the E&S Bank within 20 working days of TAP issuing the ESCH Category 1 Change Form, TAP may proceed with the change to the relevant MOC Document or route or design of the Pipeline (as the case may be) on the basis that no feedback shall be deemed approval by the IFIs and ECAs that the change is compliant with the Environmental and Social Requirements and that the IFIs and ECAs do not object to implementing the change.
- Following receipt of a written refusal notice from the E&S Bank TAP may provide a revised Category 1 ESCH Change Form (within 15 working days), and upon receipt, the E&S Bank, working with the IFIs and the ECAs, shall have a further 10 working days to provide any final written refusal notice that the IFIs and ECAs wish to deliver outlining the reason(s) for refusal with reference to the relevant Environmental and Social Requirement.
- In the absence of the E&S Bank delivering a final written refusal notice on behalf of the IFIs and ECAs within 10 working days of receipt by the IFIs and ECAs of a revised Category 1 ESCH Change Form, TAP may proceed with the change on the basis that no feedback shall be deemed approval by the IFIs and ECAs that the change is compliant with the Environmental and Social Requirements and that the IFIs and ECAs do not object to implementing the change.
- If the final feedback from the E&S Bank is a refusal notice TAP may provide a revised Category 1 ESCH Change Form and the approval process shall re-start.

3.3.3.4 Approval of Category 2 Change Categorisation

- TAP shall issue all Category 2 ESCH Change Forms to the E&S Bank and the IFIs and ECAs prior to implementation.
- If the IFIs and ECAs reject TAP's categorisation as a Category 2 ESCH Change Form and require a Category 1 ESCH Change Form to be submitted, they shall notify the E&S Bank within 15 working days of TAP issuing the ESCH Category 2 Change Form. Following receipt of any such notification from an IFI or ECA, the E&S Bank shall, as soon as reasonably practicable but in any event within 20 working days of TAP issuing the ESCH Category 2 Change Form, submit a written requirement of re-categorisation to TAP. If the E&S Bank submits a written requirement of re-categorisation to TAP, TAP shall submit a Category 1 ESCH Change Form for approval in accordance with Section 3.4.3.3.
- If the IFI Lenders and ECAs do not object to the categorisation of the Category 2 ESCH Change Form but they do not agree to the proposed change assessment and associated mitigation, they must notify the E&S Bank within 15 working days of TAP issuing the ESCH Category 2 Change Form. Following receipt of any such notification from an IFI or ECA, the E&S Bank shall, as soon as reasonably practicable but in any event within 20 working days of TAP issuing the ESCH Category 2 Change Form, provide a written refusal notice outlining the reason(s) for refusal with reference to relevant Environmental and Social Requirements.

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- In the absence of a written refusal from the E&S Bank within 20 working days of TAP issuing the ESCH Category 2 Change Form, TAP may proceed with the change on the basis that no feedback shall be deemed approval by the IFIs and ECAs that the change is compliant with the Environmental and Social Requirements and that the IFIs and ECAs do not object to implementing the change.
- Following receipt of a written refusal notice from the E&S Bank TAP may engage with the E&S Bank to revise and resubmit the Category 2 ESCH Change Form to the E&S Bank and the IFIs and ECAs (within 15 working days), and upon receipt, the E&S Bank working with the IFIs and ECAs shall have a further 10 working days to provide any final written refusal notice that the IFIs and ECAs wish to deliver outlining the reason(s) for refusal with reference to the relevant Environmental and Social Requirement.
- In the absence of the E&S Bank delivering a final written refusal notice on behalf of the IFIs and ECAs within 10 working days of receipt by the IFIs and ECAs of a revised Category 2 ESCH Change Form, TAP may proceed with the change on the basis that no feedback shall be deemed approval by the IFIs and ECAs that the change is compliant with the Environmental and Social Requirements and that the IFIs and ECAs do not object to implementing the change.
- If the final feedback from the E&S Bank is a refusal notice TAP may provide a revised Category 2 ESCH Change Form and the approval process shall re-start.

3.4.4 Monitoring and Reporting

To support monitoring and reporting of ESCH performance TAP AG has developed the following processes:

- **ESCH Compliance Register:** a compliance register will be utilised to support implementation of the ESCH management documents listed in Table 1. The register outlines the compliance tasks and includes compliance indicators to measure compliance task completion. Appendix 1 lists compliance tasks and indicators for this ESMM, management of atmospheric emissions, waste, noise control, pollution prevention and supporting method statements. Compliance tasks and compliance indicators for grievance, livelihood restoration, stakeholder engagement, cultural heritage, industrial relations, bioremediation and biodiversity offsets management are listed within the respective procedures outlined in Table 1. The compliance indicators have been aligned with UN Sustainability Development Goals and include business actions and disclosures against Sustainability Development Goal targets that are applicable to TAP operations.
- **ESCH Reporting framework:** ESCH reporting framework includes TAP AG internal and external ESCH performance reports to key stakeholders. TAP internal monthly compliance reporting shall be compiled into an internal Quarterly ESCH Compliance Dashboard for each facility for TAP Management Review. The information from the dashboard along with any further actions required to improve ESCH compliance and overall ESCH performance shall be submitted to Lenders as part of the annual self-monitoring report required under the CTA.

TAP AG ESCH oversight and assurance framework incorporating monitoring and reporting is presented in Figure 5.



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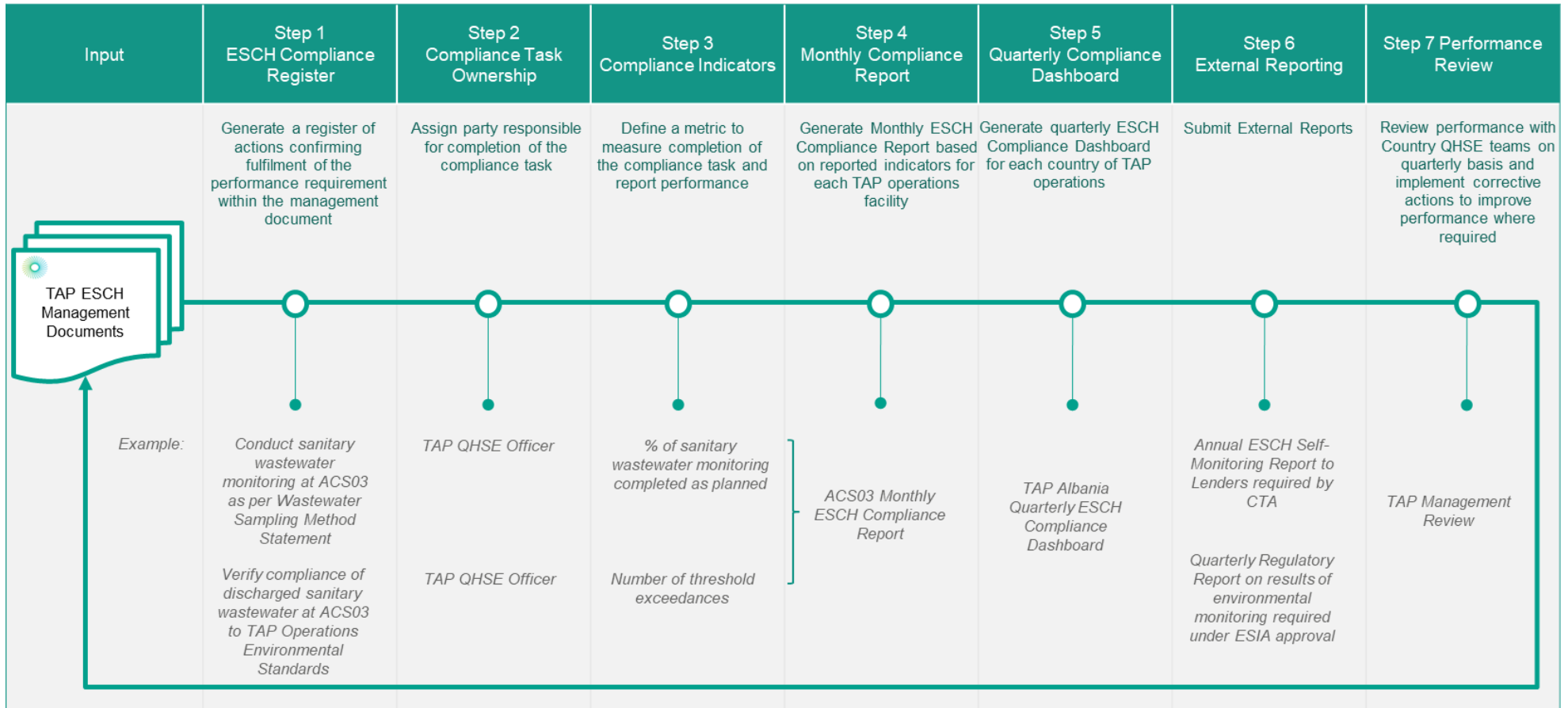


Figure 5: ESCH Oversight and Assurance Framework

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3.4.5 IESC Monitoring

In line with the CTA, TAP facilities are subject to monitoring visits by the Independent Environmental and Social Consultant (IESC) with one visit to each country per year during TAP operations phase with the objectives to:

- Verify that TAP is operated in accordance with the operations QHSE Management System, ESIAs, SLIP, ESMM, and the Environmental & Social Action Plan (ESAP)
- Identify any Environment, Social, Health and Safety (ESHS) related impacts, risks or liabilities which have not been properly mitigated or controlled by the TAP AG
- Identify areas where risks are potentially not being managed or mitigated as estimated in the ESIA, and therefore residual risks are present that require addressing
- To assist the Lenders review and approval of revisions to TAP commitments under the Management of Change Process
- To assist the Lenders' technical consultant with completion / performance testing

The outcomes of the IESC monitoring visits shall form part of the overall ESCH oversight and assurance framework and shall be subject to TAP management review and further action where necessary.

3.4.6 Regulatory Reporting

TAP AG is required to report its ESCH performance to relevant competent authorities as stipulated in applicable legislation, environmental permits and approvals. These reporting requirements include those summarised in Table 5.

3.4.7 Reporting to Lenders

As required by TAP Finance Documents TAP AG shall submit an annual Self-Monitoring Report to Lenders, which shall include results of monitoring required as per the TAP ESCH Management documentation listed in Table 1 and compliance indicators detailed in Appendix 1. In addition, TAP AG shall issue Lenders with notification and relevant remedial actions plans where required and as stipulated in the TAP Finance Documents for non-conformances, E&S incidents and management of change as described in Section 3.4.1– 3.4.3 of this manual.

3.4.8 External Reporting via TAP AG Website

TAP AG shall disclose on TAP AG website the following reports:

- Summary of IESC monitoring visit reports (see section 3.4.5)
- An annual report on GHG Emissions (Scope 1 and 2)
- An annual report on Grievance Management

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Table 5: TAP Regulatory ESCH Reporting requirements

Country	Reporting Subject	Frequency	Interfacing Authority	Required by	Reporting Format
Albania	Events of accidents or defects that result in environmental pollution	Ad-hoc	Regional Environmental Directorate National Environment Agency	Decision No 3 approving TAP ESIA Albania Decision No 51 approving ESIA Amendment 2 Decisions No 14, 21 and 24 approving ESIA Amendment 3 Decision No 26 approving ESIA Amendment 4 Decision No 47 approving ESIA Amendment 5 and applicable legislation	Formal correspondence containing notification of event
Albania	Environmental Monitoring Report	Quarterly	National Environmental Agency Regional Environmental Agency Ministry of Environment, Forestry and Water Administration	Decision No 3 approving TAP ESIA Albania and applicable legislation	TAP document format with results of environmental monitoring and responses to each condition of Permit
Albania	Environmental Monitoring Report	Annually	National Environmental Agency Regional Environmental Agency Ministry of Environment, Forestry and Water Administration	Voluntary submission	TAP document format with results of environmental monitoring and responses to each condition of Permit



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Country	Reporting Subject	Frequency	Interfacing Authority	Required by	Reporting Format
Albania	Waste Report	Annually	National Environment Agency	Decision No 47 approving ESIA Amendment 5 and applicable legislation	Part of Annual Environmental Monitoring Report
Albania	EPRTTR Report	Annually	National Environment Agency	DCM 742, partially transposing Regulation EC/166/2006 on the European Discharge Register and Pollutant Transfer amended by Regulation EC/596/2009	Specific format) detailing quantities of GHG and non-GHG emissions and hazardous wastes of certain categories
Albania	Any planned change in unforeseen operations as declared in the EIA report	Ad-hoc	Regional Environment Agency	Decision No 3 approving TAP ESIA Albania Decision No 47 approving ESIA Amendment 5 and applicable legislation	Formal correspondence containing notification and description of change
Greece	Any change to the approved ESIA and its subsequent amendments	Ad-hoc	Ministry of Environment, Energy and Climate Change	Article 6 of Greek Law 4014/2011	Formal correspondence containing notification and description of change
Greece	Environmental Monitoring Report	Annually by the end of March each year	Ministry of Environment, Energy and Climate Change	Decision No 174848/2014 approving TAP ESIA Greece	TAP document format with results of environmental monitoring and responses to each condition of Approval Decision
Greece	Waste Report	Annually	Ministry of Environment, Energy and Climate Change	Law 4819/2021 Article 74 and Ministerial Decision 43942/4026/2016 (Article 8, Paragraph 2)	Electronic submission via government online database



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Country	Reporting Subject	Frequency	Interfacing Authority	Required by	Reporting Format
Greece	ETS Report	Annually	Ministry of Environment, Energy and Climate Change	EU Emission Trading Scheme and applicable Greek legislation	Specific format detailing CO _{2e} emission quantities
Greece	EPRT Report	Annually	Ministry of Environment, Energy and Climate Change	Regulation EC No 166/2006 and Circular 101111 / 17.02.2009	Specific format detailing quantities of GHG and non-GHG emissions and hazardous wastes of certain categories
Greece	Large Combustion Plant (LCP) Report	Annually	Ministry of Environment, Energy and Climate Change	Directive 2001/80/EC and Article 57 of JMD 36060/1155 /E.103	Specific format detailing stack emission types and quantities
Greece	EU Registry Report	Annually	Ministry of Environment, Energy and Climate Change	Industrial Emissions Directive 2010/75/EU, European Pollutant Release and Transfer Register Regulation (EC) No 166/2006 and Article 57 of JMD 36060/1155 /E.103	Specific format detailing general facility information and sources of emissions
Greece	Fluorinated Gases Report	Annually	Ministry of Environment, Energy and Climate Change	Regulation EC No 517/2014 and JMD ΥΠΕΝ / ΔΔΕΔ / 85858/2124/2021	Electronic submission
Italy	Environmental Monitoring Report	Quarterly	Ministry of Ecological Transition ⁴ ISPRA and ARPA Puglia	EIA Decree No 223/14 VoC A.31 and applicable legislation	Specific format submitted separately for onshore and offshore submitted as formal correspondence

⁴ Formerly Ministry of Environment and Protection of Land and Sea



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Country	Reporting Subject	Frequency	Interfacing Authority	Required by	Reporting Format
Italy	Wastewater Quality Monitoring Report	Annually	Ministry of Ecological Transition ISPRA and ARPA Puglia	Single Environmental Authorisation (AUA) received in September 2024	Special format detailing results of wastewater monitoring
Italy	Natural Gas Quality Report	Bi-annually	Ministry of Ecological Transition ISPRA and ARPA Puglia	EIA Decree No 223/14 VoC A.56 and applicable legislation	Specific format detailing quality of natural gas submitted as formal correspondence letter
Italy	Reporting of Contamination caused by TAP operations	Ad-hoc within 24hours of accident	Provincial and regional authorities, Municipality	Article 242 L.Decree 152/06 and applicable legislation	Formal correspondence containing notification of event
Italy	Reporting of contamination caused by a third party	Ad-hoc	Provincial and regional authorities, Municipality	Article 245 L.Decree 152/06 and applicable legislation	Formal correspondence containing notification of event
Italy	Fluorinated Gases Report	Annually	Ministry of Ecological Transition	Presidential Decree n. 146 of 16 November 2018, which implements Regulation (EU) 517/2014 on fluorinated greenhouse gases	Electronic submission via online national database of F-Gases (www.fgas.it)
Italy	GHG and Fugitive Emissions Report	Annually	Ministry of Ecological Transition ISPRA and ARPA Puglia	EIA Decree, condition A.31 – Atmosphere as per provision of the Ministry of Environment opinion 2021-0000041	Specific format submitted as formal correspondence

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3.5 Management Review

Management Review is the last element of the ESMM Cycle (Figure 2), closing the adaptive management feedback loop. TAP senior management shall periodically (annually as a minimum) review the overall effectiveness of the QHSE management system. The purpose of the Management Review is three-fold:

- Provide management with a summary of QHSE performance over the year particularly regarding suitability, adequacy, effectiveness and alignment with TAP AG's strategic direction
- Identify where environmental and social improvements can be made
- Summarise the significant Quality, Health, Safety and Environment risks and their proposed mitigation, in the following period.

The management review shall include:

- Status and follow up of actions from previous management reviews
- Changes in circumstances, including changes in compliance obligations, external and internal issues relevant to the QHSE Management System, significant environmental aspects and risks and opportunities
- The extent to which the QHSE objectives have been achieved
- Information on trends in QHSE performance including:
 - Audit results
 - Results of monitoring required under TAP ESCH Management documentation listed in Table 1 and compliance indicators detailed in Appendix 1 of this document
 - Fulfilment of compliance obligations
 - Incident investigations, corrective and preventative actions
 - Non-conformities and further actions
- The results of participation and consultation exercises
- Relevant communications from interested parties, including complaints
- Recommendations and opportunities for improvement
- Adequacy of resources
- Customer satisfaction and feedback from external parties
- Process performance and conformity of service

The outputs of the management review shall include:

- Conclusions on the continuing suitability, adequacy and effectiveness of the QHSE Management System
- Decisions and actions related to:
 - Continual improvement such as possible changes to QHSE Management System performance, QHSE Policy, objectives, resources etc.
 - Opportunities to further integrate the QHSE Management System with other business functions
- Action required, if necessary, where QHSE Management System objectives have not been achieved
- Implications of QHSE Management System performance on the strategic direction of the organisation.
- Need for change to the QHSES Management System



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4. Risk Assessment

Not applicable.

5. Records

Record	Document Code/Number (if any)	Generated By	Resp. To Store	Storage Method	Location	Storage Period Prior to Disposition
HSE Legal register	In accordance with TAP corporate procedures	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
Results of biorestitution monitoring	In accordance with TAP corporate procedures	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
Biorestitution Evaluation and Close-out Audit Report	In accordance with TAP corporate procedures	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
Results of LATS implementation and monitoring	In accordance with TAP corporate procedures	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
LATS close-out Audit Report	In accordance with TAP corporate procedures	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
ESCH training records	In accordance with TAP corporate procedures	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
TAP ESCH Non-conformances and corrective actions	In accordance with TAP corporate procedures	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
Deviations from CTA Environmental and Social Requirements of the CTA	In accordance with CTA	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
ESCH Incident notifications and investigation reports (including remedial actions plans where required)	In accordance with TAP corporate procedures and CTA	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines



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Record	Document Code/Number (if any)	Generated By	Resp. To Store	Storage Method	Location	Storage Period Prior to Disposition
ESCH Management of Change	In accordance with TAP corporate procedures and CTA	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
IESC Monitoring Visit Reports	In accordance with CTA	Corporate QHSE	Corporate QHSE	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
External reports to competent authorities	In accordance with TAP corporate procedures	TAP QHSE Officer	TAP QHSE Officer	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines
Records of TAP Management Reviews	In accordance with TAP corporate procedures	TAP QHSE Officer	TAP QHSE Officer	Electronic /Hard copy	TAP Facility	In accordance with TAP Records Retention Guidelines



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6. Changes Since Last Revision

Summary of Changes (Brief)	Section
Description of facilities updated	1.1
Roles and responsibilities of the Land Manager included to replace E&S Compliance and Assurance Manager	1.4.3
References updated to remove project related documents no longer applicable	2
Table 1 and Figure 3 updated to reflect changes in the management system documents	3.2
Table 5 updated to include annual wastewater quality monitoring reports to authorities in Italy	3.4.6
Records section updated	5
Appendix 1 (ESCH Compliance Indicators) revised	7



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7. List of Appendices

7.1 Appendix 1 – Compliance Tasks and Indicators

7.1 Appendix 1 – Compliance Tasks and Indicators

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy	
Environmental and Social Management Manual								
ESMM-CT-01	Confirm that the ESMM and Operations phase ESCH management documentation remains suitable and sufficient for TAP AG operations	ESMM-CI-01	ESMM and Operations Phase ESCH management documentation reviewed and updated as planned (100% yes, 0% no)	Every 3 years	-	-	-	100% of planned ESCH management documentation review completed
ESMM-CT-02	Facilitate audit of TAP QHSE Management system to ISO 14001:2015	ESMM-CI-02	ISO 14001 audit of QHSE Management System conducted as planned (100% yes, 0% no)	As per certification schedule	-	-	-	ISO 14001 Certification maintained as planned
ESMM-CT-03	Verify that QHSE ESMM training has been delivered as planned	ESMM-CI-03	% of QHSE ESMM Training provided as planned	Every 2 years	-	-	-	100% of planned QHSE Training conducted
ESMM-CT-04	Verify that deviations from internal TAP ESCH requirements that have not been approved by TAP have been categorised and recorded within the Non-conformance module of the PIMS	ESMM-CI-04	Number of non-conformance raised and recorded within PIMS (see ESMM Section 3.4.1 for definition of non-conformance)	-	Quarterly	Quarterly	Quarterly	100% of non-compliances recorded in PIMS within NCR Procedure deadlines
ESMM-CT-05	Verify that material non-conformance with CTA Environmental and Social Requirements have been reported to Lenders within CTA deadlines along with any required notifications and remedial actions plans where applicable	ESMM-CI-05	Number and % of Lender reportable non-compliance submitted to Lenders within CTA deadlines	Ad-hoc	-	-	-	100% compliance with CTA deadlines for non-compliance notification and reporting
ESMM-CT-06	Verify that ESCH incidents have been reported in accordance with QHSE Incident Reporting and Investigation Procedure	ESMM-CI-06	Number of ESCH incidents reported (see ESMM Section 3.4.2 for definition of E&S incident)	-	Monthly	Monthly	Monthly	100% compliance with deadlines as per QHSE Incident Reporting and Investigation procedure
ESMM-CT-07	Verify that lender reportable incidents have been reported to Lenders within CTA deadlines along with any required notifications, remedial actions plans where applicable and incident investigation reports	ESMM-CI-07	Number and % of Lender reportable incidents submitted to Lenders within CTA deadlines	Ad-hoc	-	-	-	100% compliance with CTA deadlines on incident notification and reporting
ESMM-CT-08	Verify that ESCH management of change process has been undertaken for type of changes listed in Section 3.4.3	ESMM-CI-08	Number of ESCH change forms raised for Category 1, 2 and 3 changes	-	Ad-hoc	Ad-hoc	Ad-hoc	100% compliance with MoC procedure of the ESMM
ESMM-CT-09	Verify that ESCH Change Forms for Category 1 and 2 changes have been submitted to Lenders for review and approval prior to implementation	ESMM-CI-09	% and number of Category 1 and 2 ESCH Change Forms submitted for Lender approval prior to implementation	Ad-hoc	-	-	-	100% of Category 1 and 2 ESCH Changes submitted for lender approval
ESMM-CT-10	Facilitate IESC / Lender Monitoring Visits	ESMM-CI-10	% of IESC / Lender Monitoring visits completed as planned	Annually	-	-	-	100% of planned IESC / lender monitoring visits completed
ESMM-CT-11	Facilitate QHSE Management Review	ESMM-CI-11	QHSE Management Review conducted as planned (100% yes, 0% no)	Every 6 months	-	-	-	100% of planned QHSE management reviews completed
ESMM-CT-12	Submit annual Self-Monitoring ESCH Report to Lenders on Debt Domain	ESMM-CI-12	Self-Monitoring Report submitted to Lenders and uploaded to Debt Domain within 90 days following the end of financial year (100% - yes, 0% - no)	Annually	-	-	-	100% compliance with CTA deadline for self-monitoring report

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy	
ESMM-CT-13	Verify that Environmental Monitoring Report has been submitted to competent government authority	ESMM-CI-13	Environmental Monitoring Report submitted to competent government authority within deadline (100% yes, 0% no)	-	Annually	Quarterly and annually	Quarterly	100% compliance with submission required under ESIA approval (GR), Environmental Permit (AL) or EMP (IT)
ESMM-CT-14	Verify Waste Report has been submitted to competent government authority	ESMM-CI-14	Waste report submitted to competent government authority within deadline (100% yes, % no)	-	Annually	Annually (part of Annual Environmental Monitoring Report)	-	100% compliance with regulatory waste reporting
ESMM-CT-15	Verify that ETS Report has been submitted to competent government authority	ESMM-CI-15	ETS Report submitted to competent government authority within deadline (100% yes, 0% no)	-	Annually	-	-	100% compliance with Emissions Management Procedure Under EU ETS
ESMM-CT-16	Verify that EPRTR Report has been submitted to competent government authority	ESMM-CI-16	EPRTR Report submitted to competent government authority within deadline (100% yes, 0% no)	-	Annually	Annually	-	100% compliance with regulatory EPRTR reporting
ESMM-CT-17	Verify that LCP Report has been submitted to competent government authority	ESMM-CI-17	LCP Report submitted to competent government authority within deadline (100% yes, 0% no)	-	Annually	-	-	100% compliance with regulatory LCP reporting
ESMM-CT-18	Verify that EU Registry Report has been submitted to competent government authority	ESMM-CI-18	EU Registry Report submitted to competent government authority within deadline (100% yes, 0% no)	-	Annually	-	-	100% compliance with regulatory EU Registry reporting
ESMM-CT-19	Verify that Fluorinated Gases Report has been submitted to competent government authority	ESMM-CI-19	Fluorinated Gases Report submitted to competent government authority within deadline (100% yes, 0% no)	-	Annually	-	Annually	100% compliance with regulatory F-gases reporting
ESMM-CT-20	Verify that GHG and Fugitive Emissions Report has been submitted to competent government authority	ESMM-CI-20	GHG and Fugitive Emissions Report submitted to competent government authority within deadline (100% yes, 0% no)	-	Annually (part of ESCH Report)	-	Annually	100% compliance with regulatory GHG and Fugitive Emissions reporting
ESMM-CT-21	Confirm following reports have been disclosed on TAP AG website: 1) Summary of IESC monitoring visit reports 2) GHG Emissions Report (Scope 1 and 2) 3) Grievance Management Report	ESMM-CI-21	External disclosure reports published on TAP AG website as planned (100% yes, 0% no) 1) Summary of IESC monitoring visit reports 2) GHG Emissions Report (Scope 1 and 2) 3) Grievance Management Report	Annually	-	-	-	100% of external reports disclosed on TAP AG website at required frequencies
ESMM-CT-22	Conduct Environmental Review under Annex II of EMAS Regulations	ESMM-CI-22	EMAS Environmental Review conducted as planned (100% yes, 0% no)	-	-	-	Annually	100% compliance with Environmental Review conducted in accordance with Annex II of EMAS Regulations
Waste Management Procedure								
WMP-CT-01	Conduct annual assessment of O&M Contractors' subcontractors engaged in the transportation, receipt and off-site reuse, recycling, recovery, treatment and disposal of waste	WMP-CI-01	Number and % of waste transporters and receivers annually assessed for compliance using the Waste Transporting and Receiving Facility Inspection Checklist	-	Every 3 years	Every 3 years	Every 3 years	100% of waste transporters and receivers inspected as planned
WMP-CT-02	Develop and maintain facility Waste Management Matrix	WMP-CI-02	Facility Waste Management Matrix developed and updated as necessary (100% yes, 0% no)	-	Quarterly	Quarterly	Quarterly	Availability of up-to-date Facility Waste Management Matrix

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy	
WMP-CT-03	Develop and maintain facility Waste Collection and Storage Map	WMP-CI-03	Facility Waste Collection and Storage Map developed and updated as necessary (100% yes, 0% no)	-	Annually	Annually	Annually	Availability of up-to-date Waste Collection and Storage Map
WMP-CT-04	Conduct facility Waste Management Inspection	WMP-CI-04	Quarterly Waste Management Inspection completed (100% yea, 0% no)	-	Every 6 months	Every 6 months	Every 6 months	100% of quarterly waste management inspections completed as planned
WMP-CT-05	Verify implementation of Waste Transfer Note system and Waste Tracking Register	WMP-CI-05	Facility Waste Transfer Note system and Waste Tracking Register implemented (yes 100%, 0%)	-	Monthly	Monthly	Monthly	100% compliance with Waste Transfer Note System
WMP-CT-06	Generate and submit Monthly Waste Report to TAP AG management	WMP-CI-06	Monthly Waste Report submitted (100% yes, 0% no) -Report the following data for ESCH Compliance Dashboard: 1) Total waste generated [kg] 2) Total recycled / reused waste [kg and %] 3) Total landfilled waste [kg and %] 4) Total hazardous waste shipped internationally [kg and %]	-	Monthly	Monthly	Monthly	100% compliance with internal waste reporting requirements
WMP-CT-07	Verify that contractor vessels have: – Garbage Management Plan and Garbage Record Book (required by MARPOL Annex V) – International Sewage Pollution Prevention Certificate and detailed logs of overboard discharges associated with the above (required by MARPOL Annex IV) - all vessels with marine sanitation device.	WMP-CI-07	Number and % of vessels with Garbage Management Plan. Garbage Record Book and International Pollution Prevention Certificate available	-	-	-	Once (unless new vessel is hired)	100% compliance with applicable IMO and MARPOL requirements
WMP-CT-08	Verify that contractor vessels of 400 gross tonnage and above carry: – International Anti-fouling System Certificate and Anti-fouling Declaration (required by AFS Convention Annex 4) – Ballast Water and Sediment Management Plan, Ballast Water Record Book and International Ballast Water Management Certificate (required by Ballast Water Convention) and detailed logs of associated overboard discharges.	WMP-CI-08	Number and % of vessels over 400 gross tonnage with AFS Certificate, AFS Declaration, Ballas Water Record Book and Ballast Water Management Certificate available	-	-	-	Once (unless new vessel is hired)	100% compliance with applicable AFS and Ballast Water Convention requirements
Waste and Resource Consumption Minimisation Procedure								
WMP-CT-01	Assessment of the need to include new initiatives into the QHSE Activity Plan	WMP-CI-01	Assessment of the need to implement new initiatives completed as planned (100% yes, 0% no)	-	Annually	Annually	Annually	100% completion of assessment for new initiatives
Pollution Prevention Procedure								

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy	
PP-CT-01	Conduct air quality monitoring (PM ₁₀) as per Method Statement Air Quality Monitoring if considered required and verify compliance of PM ₁₀ levels to TAP Operations Environmental Standards	PP-CI-01	- % of PM ₁₀ monitoring conducted as planned - number of exceedances of applicable PM ₁₀ thresholds	-	Ad-hoc	Ad-hoc	Monthly for continuous monitoring at AQ9 / Every 4 months for AQ5 and AQ6	100% of PM ₁₀ monitoring conducted as planned zero exceedances of applicable PM ₁₀ thresholds
PP-CT-02	Verify site wastewater treatment plant has O&M procedures developed and has been included in facility preventive maintenance system	PP-CI-02	Site wastewater treatment plant with defined O&M procedures and included in facility preventive maintenance system (yes 100%, no 0%)	-	-	-	Once (unless there is a significant modification to the plant)	100% engineering verification process completed, site wastewater treatment plant O&M procedures developed, and plant included in facility maintenance system
PP-CT-03	Conduct a pollution risk assessment for hazardous liquids stored and used on site	PP-CI-03	Facility Pollution risk assessment conducted (100% yes, 0% no)	-	Every 3 years (or sooner with change in storage or procurement of new material)	Every 3 years (or sooner with change in storage or procurement of new material)	Every 3 years (or sooner with change in storage or procurement of new material)	Availability of up-to-date Facility Pollution Risk Assessment
PP-CT-04	Conduct a review of hazardous materials to verify that products falling within WHO Classification of Pesticides Class I.a and Class I.b or Class II are not being used	PP-CI-04	Review of hazardous materials for use of pesticides conducted as part of Hazardous Material Inventory update (yes 100%, no 0%)	-	Once (unless new products are used)	Once (unless new products are used)	Once (unless new products are used)	Availability of up-to-date Facility Hazardous Material Inventory
PP-CT-05	Develop and implement a Pesticide Management Plan if pesticides are used	PP-CI-05	Pesticide Management Plan developed and implemented if pesticides are used (yes 100%, no %)	-	Once (if pesticides are used)	Once (if pesticides are used)	Once (if pesticides are used)	Availability of Pesticide Management Plan (if required)
PP-CT-06	Develop and maintain Facility Hazardous Material Inventory	PP-CI-06	Facility hazardous material inventory developed and updated (100% yes, 0% no)	-	Quarterly (or sooner if new hazardous materials are procured)	Quarterly (or sooner if new hazardous materials are procured)	Quarterly (or sooner if new hazardous materials are procured)	Availability of up-to-date Facility Hazardous Material Inventory
PP-CT-07	Establish an MSDS Database for all chemicals, lubricants and fuels used and stored within the facility	PP-CI-07	Facility MSDS Database established and updated (100% yes, 0% no)	-	Quarterly (or sooner if new hazardous materials are procured)	Quarterly (or sooner if new hazardous materials are procured)	Quarterly (or sooner if new hazardous materials are procured)	Availability of up-to-date Facility MSDS Database
PP-CT-08	Conduct inspection of the affected area following a spill for extent of potential contamination and additional clean up measures required following a risk-based approach	PP-CI-08	Number and % of spill incidents followed up by inspection for extent of potential contamination using risk-based approach	-	Ad-hoc	Ad-hoc	Ad-hoc	100% spills followed up by inspection for risk-based assessment of contamination
PP-CT-09	Verify ISO17025 accreditation and ability to comply with Method Statements for all contractors engaged in pollution prevention monitoring and reporting	PP-CI-09	Number and % of environmental monitoring contractors accredited to ISO 17025 and assessed for ability to comply with Method Statements	-	Once (unless laboratories are used)	Once (unless laboratories are used)	Once (unless laboratories are used)	100% of engaged laboratories certified to ISO17025
PP-CT-10	Conduct Environmental Inspection	PP-CI-10	Quarterly Environmental Inspection completed (100% yes, 0% no)	-	Every 6 months	Every 6 months	Every 6 months	100% of Environmental Inspections completed as planned

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria	
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy		
Method Statement Noise Monitoring									
NMS-CT-01	Verify compliance of the following to Method statement: - type of survey equipment and calibration conditions - survey conditions - record of deviations	NMS-CI-01	Equipment, survey conditions and deviations in compliance with Method Statement specifications (yes 100%, no 0%)	-	Every 2 years	Quarterly (relaxed to every 6 months on approval from authorities)	Monthly for continuous monitoring at N3n	100% compliance with Method Statement specifications	
NMS-CT-02	Conduct noise monitoring survey	NMS-CI-02	% of noise monitoring conducted as planned	-	Every 2 years	Quarterly (relaxed to every 6 months on approval from authorities)	Monthly for continuous monitoring at N3n	100% of noise monitoring conducted	
NMS-CT-03	Verify noise monitoring survey was conducted at locations specified in Method Statement	NMS-CI-03	Number and % of sampling locations surveyed in compliance with Method Statement	-	Every 2 years	Quarterly (relaxed to every 6 months on approval from authorities)	Monthly for continuous monitoring at N3n	100% compliance of sampling locations with Method Statement	
NMS-CT-04	Verify compliance of noise monitoring survey results to thresholds specified in Method Statement	NMS-CI-04	Number of exceedances of applicable noise thresholds	-	Every 2 years	Quarterly (relaxed to every 6 months on approval from authorities)	Monthly for continuous monitoring at N3n	zero exceedances of applicable noise thresholds	
NMS-CT-05	Conduct investigation of reported exceedances of applicable thresholds and take corrective action where TAP contribution is confirmed	NMS-CI-05	Number and % of exceedances of applicable thresholds investigated and corrected	-	Ad-hoc	Ad-hoc	Ad-hoc	100% of exceedances investigated and corrective action taken where TAP AG contribution has been confirmed	
NMS-CT-06	Verify that noise monitoring results have been included in Environmental Monitoring Report to competent authorities	NMS-CI-06	Noise monitoring results included in Environmental Monitoring Reports to competent authorities (100% yes, 0% no)	-	Every 2 years (included in the relevant Annual Report)	Quarterly (included in the relevant quarterly report)	Quarterly (included in the relevant quarterly report)	100% compliance with regulatory reporting on environmental monitoring	
Method Statement Groundwater Monitoring									
GMS-CT-01	Verify compliance of the following to Method statement: - type of survey equipment, calibration and decontamination - pre-sampling checks of borehole condition - purging to required volume until monitoring parameters are stabilised - disposal of purged water via acceptable routes - sampling methodology, sample volume, storage and transportation	GMS-CI-01	Equipment, survey conditions and sampling methodology in compliance with Method Statement specifications (yes 100%, no 0%)	-	Annually	Quarterly	Annually at PZ2	100% compliance with Method Statement specifications	

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy	
GMS-CT-02	Conduct groundwater monitoring survey	GMS-CI-02	% of groundwater monitoring conducted as planned	-	Annually	Quarterly	Annually at PZ2	100% of groundwater monitoring conducted
GMS-CT-03	Verify groundwater survey was conducted at sampling locations specified in Method Statement	GMS-CI-03	Number and % of sampling locations surveyed in compliance with Method Statement	-	Annually	Quarterly	Annually at PZ2	100% compliance of sampling locations with Method Statement
GMS-CT-04	Verify compliance of groundwater monitoring survey results to thresholds specified in Method Statement	GMS-CI-04	Number of exceedances of applicable groundwater quality thresholds	-	Annually	Quarterly	Annually at PZ2	zero exceedances of applicable groundwater thresholds
GMS-CT-05	Conduct investigation of reported exceedances of applicable thresholds and take corrective action where TAP contribution is confirmed	GMS-CI-05	Number and % of exceedances of applicable thresholds investigated and corrected	-	Ad-hoc	Ad-hoc	Ad-hoc	100% of exceedances investigated and corrective action taken where TAP AG contribution has been confirmed
GMS-CT-06	Verify that groundwater monitoring results have been included in Environmental Monitoring reports to competent authorities	GMS-CI-06	Groundwater monitoring results included in Environmental Monitoring Reports to competent authorities (100% yes, 0% no)	-	Annually	Quarterly	Annually (included in the relevant quarterly report)	100% compliance with regulatory reporting on environmental monitoring
Method Statement Wastewater Monitoring								
WMS-CT-01	Verify compliance of the following to Method statement: - type of survey equipment, calibration and decontamination - pre-sampling checks of sampling pits - sampling methodology, sample volume, storage and transportation	WMS-CI-01	Equipment, survey conditions and sampling methodology in compliance with Method Statement specifications (yes 100%, no 0%)	-	Every 6 months	Quarterly (relaxed to every 6 months on approval from authorities)	Quarterly	100% compliance with Method Statement specifications
WMS-CT-02	Conduct stormwater network discharge monitoring	WMS-CI-02	% of stormwater network discharge monitoring conducted as planned	-	Every 6 months	Quarterly (relaxed to every 6 months on approval from authorities)	Quarterly	100% of stormwater monitoring conducted
WMS-CT-03	Conduct sanitary wastewater network discharge monitoring	WMS-CI-03	% of sanitary wastewater network discharge monitoring conducted as planned	-	Every 6 months	Quarterly (relaxed to every 6 months on approval from authorities)	Quarterly	100% of sanitary wastewater monitoring conducted
WMS-CT-04	Conduct brine discharge monitoring	WMS-CI-04	% of brine discharge monitoring conducted as planned	-	-	Quarterly (relaxed to every 6 months on approval from authorities)	-	100% of brine monitoring conducted
WMS-CT-05	Verify stormwater network discharge survey was conducted at sampling locations specified within Method Statement	WMS-CI-05	Number and % of stormwater sampling locations surveyed in compliance with Method Statement	-	Every 6 months	Quarterly (relaxed to every 6 months on approval)	Quarterly	100% compliance of sampling locations with Method Statement

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy	
						from authorities)		
WMS-CT-06	Verify sanitary wastewater network discharge survey was conducted at sampling locations specified in Method Statement	WMS-CI-06	Number and % of sanitary wastewater sampling locations surveyed in compliance with Method Statement	-	Every 6 months	Quarterly (relaxed to every 6 months on approval from authorities)	Quarterly	100% compliance of sampling locations with Method Statement
WMS-CT-07	Verify brine discharge survey was conducted at sampling locations specified in Method Statement	WMS-CI-07	Number and % of brine sampling locations surveyed in compliance with Method Statement	-	-	Quarterly (relaxed to every 6 months on approval from authorities)	-	100% compliance of sampling locations with Method Statement
WMS-CT-08	Verify compliance of stormwater monitoring survey results to thresholds specified in Method Statement	WMS-CI-08	Number of exceedances of applicable stormwater quality thresholds	-	Every 6 months	Quarterly (relaxed to every 6 months on approval from authorities)	Quarterly	zero exceedances of applicable stormwater thresholds
WMS-CT-09	Verify compliance of sanitary wastewater monitoring survey results to thresholds specified in Method Statement	WMS-CI-09	Number of exceedances of applicable sanitary wastewater quality thresholds	-	Every 6 months	Quarterly (relaxed to every 6 months on approval from authorities)	Quarterly	zero exceedances of applicable sanitary wastewater thresholds
WMS-CT-10	Verify compliance of brine monitoring survey results to thresholds specified in Method Statement	WMS-CI-10	Number of exceedances of applicable brine quality thresholds	-	-	Quarterly (relaxed to every 6 months on approval from authorities)	-	zero exceedances of applicable brine thresholds
WMS-CT-11	Conduct investigation of reported exceedances of applicable thresholds and take corrective action where TAP contribution is confirmed	WMS-CI-11	Number and % of exceedances of applicable thresholds investigated and corrected	-	Ad-hoc	Ad-hoc	Ad-hoc	100% of exceedances investigated and corrective action taken where TAP AG contribution has been confirmed
WMS-CT-12	Verify that wastewater monitoring results have been included in Environmental Monitoring reports to competent authorities	WMS-CI-12	Wastewater monitoring results included in Environmental Monitoring Reports to competent authorities (100% yes, 0% no)	-	Annually	Quarterly	Annually	100% compliance with regulatory reporting on environmental monitoring
Atmospheric Emissions Management Procedure								
AEM-CT-01	Conduct Annual Review of progress towards carbon reduction targets, financial savings achieved, cost of the program and risk register	AEM-CI-01	Annual Review conducted as planned (100% yes, 0% no)	Annually	-	-	-	100% of annual review conducted as planned

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy	
AEM-CT-02	Develop an Annual Improvements Action Plan to review progress of goals and suitability of the plan	AEM-CI-02	Annual Improvements Action plan developed (yes 100%, no 0%)	Annually	-	-	-	Availability of up-to-date Annual Improvements Action Plan
AEM-CT-03	Facilitate internal audit of Atmospheric Emissions Management Procedure and related policies and procedures and report outcomes to the Working Group.	AEM-CI-03	Internal Audit of Atmospheric Emissions Management Procedure conducted as planned and outcomes reported to the Working Group (yes 100%, no 0%)	Annually	-	-	-	100% of internal auditing conducted as planned
AEM-CT-04	Facilitate audit of TAP QHSE Management system to ISO 50001 standard	AEM-CI-04	ISO 50001 audit of QHSE Management System conducted as planned (100% yes, 0% no)	As per certification schedule	-	-	-	ISO 50001 certification obtained / maintained as planned
AEM-CT-05	Establish emission reduction and energy saving targets for the upcoming periods	AEM-CI-05	Emission reduction and energy saving targets for upcoming periods (yes 100%, no 0%)	Every 5 years	-	-	-	100% with Carbon Management Plan
AEM-CT-06	Facilitate validation of BAT abatement technology	AEM-CI-06	BAT assessment reports reviewed / updated as necessary (yes 100%, no 0%)	Ad-hoc (when triggered by legislation change)	-	-	-	100% of BAT assessment reports reviewed / updated as necessary
AEM-CT-07	Facilitate detailed field surveys to establish leakage baseline	AEM-CI-07	Leakage baseline established / revised (if needed) (100% yes / 0% no)	Every 5 years	-	-	-	100% Compliance to Carbon Management Plan
AEM-CT-08	Conduct fugitive emissions monitoring	AEM-CI-08	% of fugitive emissions monitoring conducted as planned	-	Annually	Annually	Annually	100% of fugitive emission monitoring conducted
AEM-CT-09	Conduct calculation of GHG Emissions	AEM-CI-09	% GHG Emissions calculation completed as planned	-	Annually	Annually	Annually	100% of GHG calculations conducted
Reporting and Calculation of NOx, SOx and CO Emissions Procedure								
RAC-CT-01	Collate natural gas consumption data (m3) from fixed Installations (including Melendugno IT), obtained via meter readings at stations and SRG fiscal metering at Melendugno IP	RAC-CI-01	Natural Gas consumption data collated (100% yes, 0% no)	-	Monthly	Monthly	Monthly	100% compliance with internal natural gas consumption reporting requirements
RAC-CT-02	Collate diesel/unleaded fuel consumption data: - (lt) at fixed installations based on supplier refill invoices - diesel and unleaded fuel estimated based on km driven obtained from IVMS data or Car Fleet Management Datasheets	RAC-CI-02	Diesel/unleaded fuel consumption data collated (100% yes, 0% no)	-	Monthly	Monthly	Monthly	100% compliance with internal diesel/unleaded fuel consumption reporting requirements
Method Statement CEMS and Emissions from Stacks								
CEMS-CT-01	Verify compliance of the following to Method statement: - type of manual stack emission survey equipment - sampling methodology, including recording of reference conditions, sampling duration and number of samples, immediate analysis in field and correct measurement timings	CEMS-CI-01	Equipment, survey conditions and sampling methodology in compliance with Method Statement specifications (yes 100%, no 0%)	-	Annually	Annually	Every 6 months	100% compliance with Method Statement specifications
CEMS-CT-02	Conduct stack emission monitoring survey	CEMS-CI-02	% of stack emission monitoring survey completed as planned	-	Annually	Annually	Every 6 months	100% of stack emission monitoring conducted

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy	
CEMS-CT-03	Verify stack emission monitoring was conducted at sampling locations specified in Method Statement	CEMS-CI-03	Number and % of emission sampling locations surveyed in compliance with Method Statement	-	Annually	Annually	Every 6 months	100% compliance of sampling locations with Method Statement
CEMS-CT-04	Verify compliance of emission monitoring survey results to thresholds specified in Method Statement	CEMS-CI-04	Number of exceedances of applicable emission limits	-	Annually	Annually	Every 6 months	zero exceedances of applicable emission thresholds
CEMS-CT-05	Conduct investigation of reported exceedances of applicable thresholds and take corrective action where TAP contribution is confirmed	CEMS-CI-05	Number and % of exceedances of applicable thresholds investigated and corrected	-	Ad-hoc	Ad-hoc	Ad-hoc	100% of exceedances investigated and corrective action taken where TAP AG contribution has been confirmed
CEMS-CT-06	Verify that emission monitoring results have been included in Environmental Monitoring reports to competent authorities	CEMS-CI-06	Emission monitoring results included in Environmental Monitoring Reports to competent authorities (100% yes, 0% no)	-	Annually	Annually (included in the relevant quarterly report)	Every 6 months (included in the relevant quarterly reports)	100% compliance with regulatory reporting on environmental monitoring
Method Statement Air Quality Monitoring								
AQMS-CT-01	Verify compliance of the following to Method statement: - type of survey equipment - passive monitoring methodology, including positioning, sampling duration and number of samples	AQMS-CI-01	Equipment and passive monitoring methodology in compliance with Method Statement specifications (yes 100%, no 0%)	-	Every 2 years	Quarterly (relaxed to every 6 months on approval from authorities)	Monthly for continuous monitoring at AQ9 / Every 4 months for AQ5 and AQ6	100% compliance with Method Statement specifications
AQMS-CT-02	Conduct air quality monitoring survey	AQMS-CI-02	% of air quality monitoring survey conducted as planned	-	Every 2 years	Quarterly (relaxed to every 6 months on approval from authorities)	Monthly for continuous monitoring at AQ9 / Every 4 months for AQ5 and AQ6	100% of air quality monitoring conducted
AQMS-CT-03	Verify air quality survey was conducted at sampling locations specified in Method Statement	AQMS-CI-03	Number and % of air quality monitoring points surveyed in compliance with Method Statement	-	Every 2 years	Quarterly (relaxed to every 6 months on approval from authorities)	Monthly for continuous monitoring at AQ9 / Every 4 months for AQ5 and AQ6	100% compliance of sampling locations with Method Statement
AQMS-CT-04	Verify compliance of air quality monitoring survey results to thresholds specified in Method Statement	AQMS-CI-04	Number of exceedances of applicable air quality thresholds	-	Every 2 years	Quarterly (relaxed to every 6 months on approval from authorities)	Monthly for continuous monitoring at AQ9 / Every 4 months for AQ5 and AQ6	zero exceedances of applicable emission thresholds
AQMS-CT-05	Conduct investigation of reported exceedances of applicable thresholds and take corrective action where TAP contribution is confirmed	AQMS-CI-05	- Number and % of exceedances of applicable thresholds investigated and corrected	-	Ad-hoc	Ad-hoc	Ad-hoc	100% of exceedances investigated and corrective action taken where TAP AG contribution has been confirmed

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy	
AQMS-CT-06	Verify that air quality monitoring results have been included in Environmental Monitoring reports to competent authorities	AQMS-CI-06	Air quality monitoring results included in Environmental Monitoring Reports to competent authorities (100% yes, 0% no)	-	Every 2 years (included in the relevant Annual Report)	Quarterly	Quarterly	100% compliance with regulatory reporting on environmental monitoring
Cultural Heritage Management Plan								
CH-CT-01	Consult Operations Phase Cultural Heritage Constraints register prior to any ground-breaking works, assess for avoidance where possible	CH-CI-01	- Number of ground-breaking activities - % of ground-breaking works checked against the Operations Phase CH Constraints Register and assessed for avoidance where possible	-	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	100% of ground-breaking works checked against the Operations Phase CH Constraints Register
CH-CT-02	Carry out notification of competent authority on upcoming ground-breaking works (nature and schedule) and distribute feedback to TAP RoW Manager.	CH-CI-02	Number and % of external notification to competent authority for ground-breaking works undertaken as planned	-	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	100% of planned external notifications carried out
CH-CT-03	Implement mitigation measures specified by competent authority and Operations Phase Cultural Heritage Constraints Register and arrange for archaeological monitoring of all ground-breaking works	CH-CI-03	% of ground-breaking works supervised by field archaeologist and mitigation measures implemented	-	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	100% of ground-breaking works supervised by field archaeologist
CH-CT-04	Implement stop work protocol, arrange for assessment and await approval to proceed from competent authority (also for suspected unplanned damages to cultural heritage sites)	CH-CI-04	- Number of chance finds - Number of unplanned damage / impact incidents - % of chance finds / unplanned damage/impact cases for which stop work protocol and assessment has been completed	-	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Zero unplanned damage / impact incidents
CH-CT-05	Implement site treatment options (and conduct rescue excavations) required in accordance with decision of the competent authority (also for suspected unplanned damages to cultural heritage sites)	CH-CI-05	Number and % of chance finds / unplanned damage/impact cases for which site treatment options and rescue excavation (where required) have been implemented in accordance with decision from competent authority	-	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Implementation and stop work protocol for 100% of chance finds
CH-CT-06	Reinstate cultural heritage site following a ground-breaking activity and chance find under supervision of the Field Archaeologist and to the satisfaction of the competent authority	CH-CI-06	Number and % of cultural heritage sites reinstated under the supervision of the Field Archaeologist and to the satisfaction of the competent authority	-	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	100% compliance with competent authority decisions for chance finds and unplanned damage / impact cases
CH-CT-07	Verify that all release papers from competent archaeological authority have been secured prior to continuation of ground disturbance works and land exit	CH-CI-07	-% CH documentation secured from competent archaeological authority as planned	-	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	100% of cultural heritage sites reinstated to the satisfaction of competent authority

Compliance Task		Compliance Indicator		Task Frequency				Target and Successful Implementation Criteria
Task ID	Task Description	Indicator ID	Indicator Description	Baar	Greece	Albania	Italy	
CH-CT-08	Update GIS database and Operations Phase Register of CH Constraints with any new CH information	CH-CI-08	Update of GIS database and Operations Phase Register of CH Constraints completed as planned if required (100% yes, 0% o)	-	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	CH documentation secured for 100% of ground disturbance works where applicable prior to land exit
CH-CT-09	Submit the following reports to competent authority: - monitoring of ground disturbance works - instances of suspected / confirmed unplanned damages/impacts on cultural heritage sites - chance find reports	CH-CI-09	Number and % of reports submitted to competent authority on monitoring, chance finds and instances of unplanned damages/impacts	-	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	Ad-hoc (in the event of ground-breaking works)	100% of GIS Database and CH Constraints Register updated as planned