

CORPORATE MAJOR ACCIDENT PREVENTION POLICY

At Spirit Energy, we place special emphasis on preventing safety and environmental events caused by major accident hazards (MAH) at our offshore operations within Europe, to support our vision of “An Incident Free Workplace” as an integral part of our approach to HSES management and expectations. We seek to continuously improve control over these risks to ensure a high level of protection at all times. Senior Management are accountable for the effective implementation of this CMAPP for which they hold responsibility on an ongoing basis. All those who work for, or with, Spirit Energy are required to comply with this policy and our commitments outlined below.

Leadership and Culture

Spirit Energy expects its leaders to build and maintain a strong safety culture with a high likelihood of continuous safe operation by:

- **Visibly** role modelling high standards of safety behaviours
- **Understanding** the risks arising from major accident hazards and how these are managed by our process safety framework
- **Engaging** employees and contractors to ensure everybody is aware of their accountabilities for barrier management for preventing major accidents
- **Encouraging** our workforce and elected Safety Representatives to prevent major accidents by intervening on unsafe conditions or acts, raising any concerns and being fully authorised to stop any job
- **Safety** and environmental protection standards, in maintaining management and control of major accident hazards, are recognised and fully understood by the Board. The Board ensures our Safety and Environmental Management System holds effective health, safety, environmental and emergency response management arrangements and that these arrangements and systems are implemented into use, operated and maintained as intended, are subject to continuous improvements across all assets and are adequately resourced including the means by which we ensure compliance with all relevant statutory requirements
- **Consulting** on significant changes which may affect major accident risks
- **Recognising and rewarding** desired behaviours through appraisals and other systems
- **Implementing command and control** systems into our management arrangements to ensure senior management have informed oversight and control of operations which may impact major accident hazards through regular business management reporting and other means
- Ensuring arrangements for response to incidents and emergencies are documented in emergency response and crisis management plans.

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Competency & Training

- We identify critical roles in the management of MAHs which include senior leadership roles, Technical Authorities and personnel in front line safety critical roles and positions
- We specify competence requirements for these roles and conduct suitable competence assurance reviews
- Information, instruction, training and supervision are provided to personnel to ensure that they are competent to carry out their work with suitable levels of assurance
- We require contracting companies delivering high and medium risk rated services to have a competence assurance process in place which is assessed as part of the initial selection and through contractor auditing.

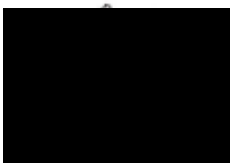
Asset Integrity and maintaining safe operations

- Our facilities are designed, constructed, operated, modified and maintained in a condition which safeguards personnel and the environment.
- The integrity of safety and environmental critical systems are ensured through suitable inspection, testing and maintenance.
- Asset integrity performance data are collected, analysed and monitored at all levels of management and are periodically used to update the inspection, testing and maintenance routines in order to ensure acceptable asset performance at all stages of the lifecycle
- We manage changes to our facilities and personnel through a robust management of change process

Assurance

- Audits, performance indicators and facility reviews are planned and conducted on a risk based approach and reviewed by local management, senior leaders and ultimately the Board to assess, monitor and assure the performance of safety and environmental critical barriers and activities.
- Audit reports are documented and audit findings are communicated to relevant stakeholders including the Board
- Major accident related actions and actions in backlog are monitored to ensure effective implementation and highlighted to the Board through regular reporting
- Processes exist to assess the impact of new or amended legislation in a timely manner
- We periodically identify, prepare and test emergency response and crisis management plans

This policy will be reviewed triennially to determine that it remains suitable, is implemented, is operating as intended and is driving continual improvement.



Chris Cox
CEO
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