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Electronic copies of this document are maintained within the Exceed Management System for access by relevant personnel.

TABLE OF CONTENTS

1	Purpose	6
2	About the Organisation	7
3	Terms & Definitions.....	8
4	Context of the Organisation	9
4.1	Understanding the Organisation & Its Context	9
4.2	Understanding the Needs and Expectations of Interested Parties	9
4.3	Scope	9
4.4	Integrated Management System and its Processes	10
4.4.1	Process Identification	10
4.4.2	Management System Overview.....	11
4.4.3	Well Management System Overview.....	12
5	Leadership.....	13
5.1	Leadership & Commitment.....	13
5.1.1	General	13
5.1.2	Client Focus	13
5.2	Policies	13
5.3	Organisational Roles & Responsibilities	14
5.4	Consultation & Participation	14
6	Planning.....	16
6.1	Actions to Address Risks & Opportunities.....	16
6.1.1	General	16
6.1.2	HSE Assessments	16
6.1.2.1	Environmental Aspects	16
6.1.2.2	Health and Safety Hazard Identification	16
6.1.2.3	Risk Assessment.....	17
6.1.3	Information Security Risk Assessment & Risk Treatment	17
6.1.4	Threat Intelligence.....	18
6.1.5	Compliance Obligations.....	18
6.1.6	Planning Action.....	19
6.2	Management System Objectives & Planning to Achieve Them	19
6.3	Planning of Changes.....	19
7	Support.....	20
7.1	Resources.....	20
7.1.1	General	20

7.1.2	People.....	20
7.1.3	Infrastructure	20
7.1.3.1	Management of Safety and Environmental Critical Elements (SECE)	20
7.1.4	Environment for the Operation of Processes	20
7.1.5	Monitoring and Measuring Resources.....	21
7.1.5.1	Independent Well Examination Scheme	21
7.1.6	Organisational Knowledge.....	21
7.2	Competence.....	22
7.3	Awareness.....	22
7.4	Communication.....	22
7.5	Documented Information	23
7.5.1	Control of Documents	23
7.5.2	Control of Records.....	23
8	Operation	25
8.1	Operational Planning & Control	25
8.1.1	General	25
8.2	Requirements for Products and Services	25
8.2.1	Client Communication	25
8.2.2	Determining the Requirements Related to Products and Services	26
8.2.3	Review of Requirements Related to Products and Services	26
8.2.4	Changes to Requirements for Products and Services	26
8.3	Design and Development of Products and Services.....	27
8.3.1	General	27
8.3.2	Design and Development Planning.....	27
8.3.3	Design and Development Inputs.....	27
8.3.4	Design and Development Controls	27
8.3.5	Design and Development Outputs.....	28
8.3.6	Design and Development Changes	28
8.4	Control of Externally Provided Processes, Products and Services	28
8.4.1	General	28
8.4.2	Type and Extent of Control.....	29
8.4.3	Evaluation of Subcontractors.....	29
8.5	Production and Service Provision.....	29
8.5.1	Control of Production and Service Provision	29
8.5.2	Identification and Traceability	30
8.5.3	Property Belonging to Clients or External Providers.....	31

8.5.4	Preservation	31
8.5.5	Post-Delivery Activities	31
8.5.6	Control of Changes	31
8.6	Release of Products and Services.....	32
8.7	Control of Nonconforming Outputs	32
8.8	Emergency Preparedness & Response.....	32
8.9	Eliminating Hazards and Reducing OH&S Risks.....	33
8.10	Information Security Risk Assessment & Treatment.....	33
9	Performance Evaluation.....	34
9.1	Monitoring, Measurement, Analysis & Evaluation.....	34
9.1.1	General	34
9.1.2	Client Satisfaction	34
9.1.3	Analysis & Evaluation.....	34
9.1.4	Evaluation of Compliance	35
9.2	Internal Audit	35
9.3	Management Review	36
10	Improvement	37
10.1	General	37
10.2	Nonconformity & Corrective Action.....	37
10.3	Incident Investigation.....	37
10.4	Continual Improvement.....	38
11	References.....	39

DOCUMENT	INTEGRATED MANAGEMENT SYSTEM MANUAL
DOCUMENT No.	EXCEED-MN-CP-001
REVISION	1
DATE	20.02.2026

1 PURPOSE

The purpose of this document is to outline the processes used by Exceed for the effective management of the organisation, as per all applicable legislation and selected international management system standards. This manual aids Exceed in the pursuit of providing high-quality services to our clients in a manner that safeguards our people and any person affected by our operations.

Exceed shall also use this manual as a means of interpreting the requirements of the applicable management system standards to ensure our operations align with the spirit of the standards.

This manual has been written in conformance with international management system standards:

- ISO 9001:2015
- ISO 14001:2015
- ISO 45001:2018
- ISO 27001:2022

This manual provides an outline of Exceed's interpretations of the requirements of the international standards, as well as an outline of the actions Exceed take to ensure conformance to those requirements; this includes reference to other relevant management system documents, as appropriate.

References to other documents, will be highlighted in **Bold**.

2 ABOUT THE ORGANISATION

Exceed is the industry-leading independent specialist in delivering well & reservoir management and performance improvement solutions to the energy and high hazard industries. An integral player in the journey to net zero, Exceed operates globally, with a mobile, highly experienced team of technical, operational professionals and performance improvement coaches working on international projects.

Headquartered in Aberdeen, Scotland (UK), Exceed was established to provide flexible and scalable access to technical excellence to our clients, and is officially recognised by the UK Regulatory Competent Authority as Well Operator, building upon over two decades of reputation for outstanding results based on effective, pragmatic project management across the well lifecycle.

Active across 41 countries, Exceed continually delivers multiple concurrent UKCS and international projects and has the critical mass to support major industry projects, whilst ensuring our teams are accessible, our clients are valued, and their projects are material to our business.

3 TERMS & DEFINITIONS

Exceed shall use the terminology and definitions provided in:

- ISO 9001 – Quality Management
- ISO 14001 - Environmental Management Systems
- ISO 45001 – Occupational Health and Safety Management
- ISO 27001 – Information Technology – Security – IS Management Systems

Unless otherwise indicated within the 3.1 Terms and Definitions Table below.

Exceed does, however, recognise that should the need arise, specific terms and definitions may be used in reference documentation to ensure the effective operation of the management system. Where this is the case, the terms and definitions will be identified within that specific document. The term and definition will be limited to use about the operation of that process or document only.

Term	Definition
Document	Documented information which instructs. Written information detailing the processes for undertaking a specific task, activity, or operation.
Record	Documented information which acts as evidence of conformity. Information used to demonstrate the completion of a task, activity, or operation.
Uncertainty	A deficiency/lack of information, knowledge or understanding of a circumstance, event, consequence and/or likelihood. (This is not to be confused with “Measurement Uncertainty”)
Risk	A negative effect of uncertainty
Opportunity	A positive effect of uncertainty
Worker	For the management system, workers shall be considered as all persons working under the control of the organisation and within the scope of the management system. This may include full-time and part-time employees and managerial and non-managerial employees. Self-employed persons and external organisations that are contracted to work within the scope of the management system.

4 CONTEXT OF THE ORGANISATION

4.1 Understanding the Organisation & Its Context

Exceed has undertaken a process to identify all issues which may impact Exceed's purpose, strategic aims, and management system ambitions. Exceed has considered both external and internal issues using the PESTLE (Political, Economic, Social, Technological, Legal and Environmental) methodology. This process then allows for a detailed assessment of our Strengths, Weaknesses, Opportunities and Threats (SWOT) as they relate to Quality, Health, Safety, Environment and Information Security.

Exceed identifies, analyses, evaluates, monitors, and reviews the issues that may impact Exceed's ability to satisfy clients and stakeholders, as well as the issues that may impact the stability of the business and/or integrated management system.

Exceed has determined these issues to be live factors, and as such, regularly monitor the issues to ensure our continued ability to perform.

The outputs of the above process are recorded in the **Context Register (EXCEED-GD-QA-004)**.

4.2 Understanding the Needs and Expectations of Interested Parties

Exceed has, in conjunction with the process outlined in section 4.1, undertaken an exercise to identify all those interested parties relevant to Exceed and what each party needs from or expects of the organisation, relevant to Integrated QHSE & IS Management. Exceed has identified all parties which either receive Exceed services, are impacted by Exceed services, are impacted by the production of Exceed services or may otherwise have a specific interest in the performance or operations of the organisation as an interested party.

Exceed has determined the interested parties to be live issues, and as such, will regularly monitor the interested parties to ensure our continued ability to perform.

The outputs of the above process will be recorded in the **Context Register (EXCEED-GD-QA-004)**.

4.3 Scope

Exceed has determined the scope of the management system based on careful consideration of external and internal issues as well as the needs and expectations of interested parties. Moreover, Exceed has considered the service provision, as well as the strategic and operational aims and direction of the organisation in the determination of the scope of the Integrated Management System (IMS).

This process has resulted in the following scope:

"Provision of well project management, performance improvement services and technical personnel to the energy sector."

The management system covers all processes, activities, undertakings, locations, and employees within Exceed. Head office is located at:



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EXCEED has established, implemented, and maintains information security controls as per the requirements of Annex A of ISO 27001. Exceed maintains evidence of this process within the Ref - Statement of Applicability (SOA).

Exceed has determined that all clauses are applicable of ISO 9001:2015, 14001:2015 and 45001:2018 to Exceed operations and in relation to ISO 27001 this is as per Exceed's Statement of Applicability.

4.4 Integrated Management System and its Processes

4.4.1 Process Identification

Exceed uses the process approach to manage and control its management system as well as its operations.

Exceed has identified the high-level processes involved in Exceed operations and manages these processes individually to reduce the potential or likelihood of non-conformities. This is achieved as the process approach allows Exceed to identify nonconformities or potential information security issues, which in turn allows Exceed to act proportionately, thereby reducing risks.

Exceed ensures that, where required, each high-level process is supported by appropriate documentation, including operational procedures/guidance documents.

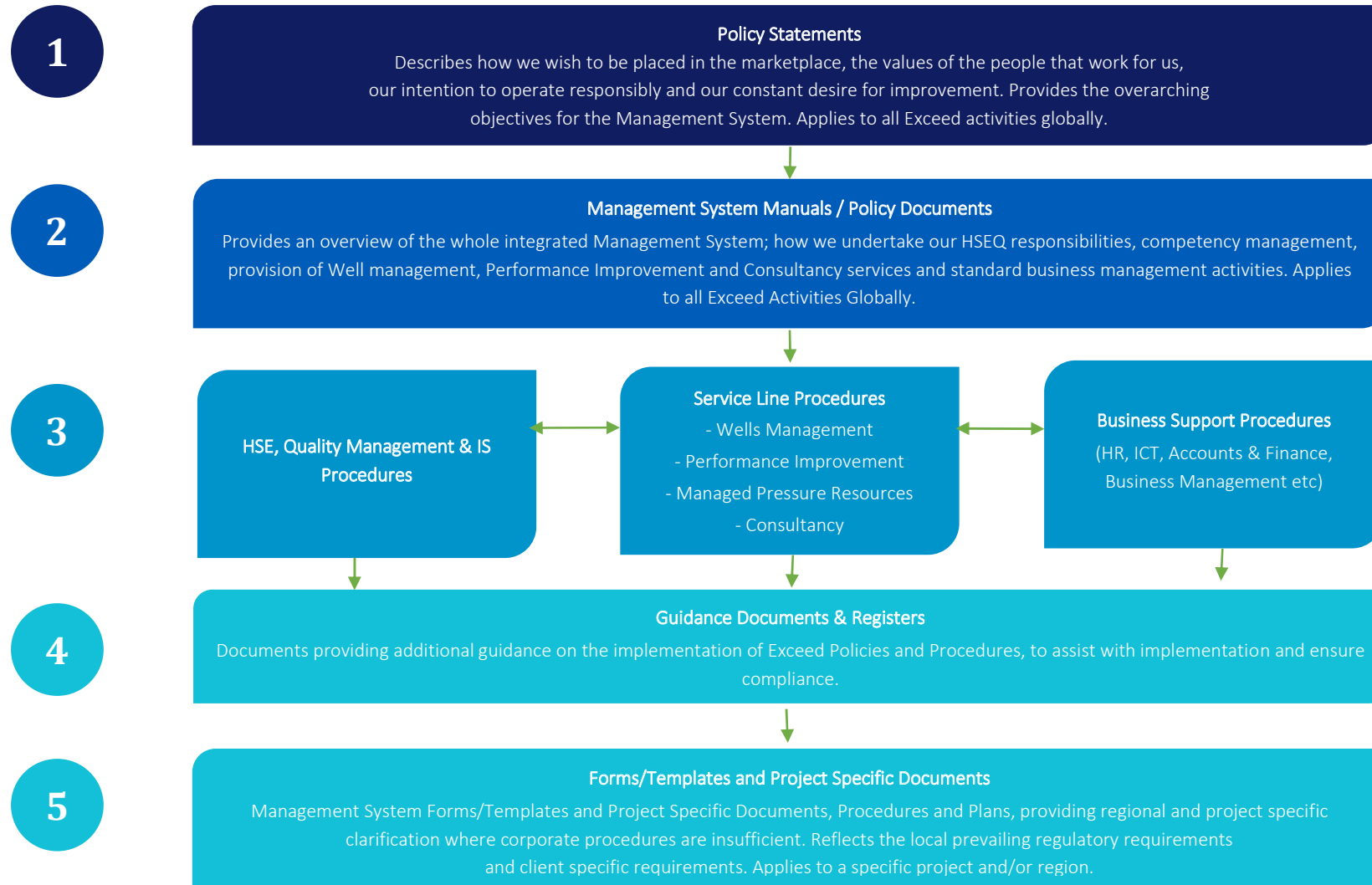
The high-level process documents are developed to ensure the successful implementation of the spirit of each document.

This is achieved through the process document outlining, where appropriate:

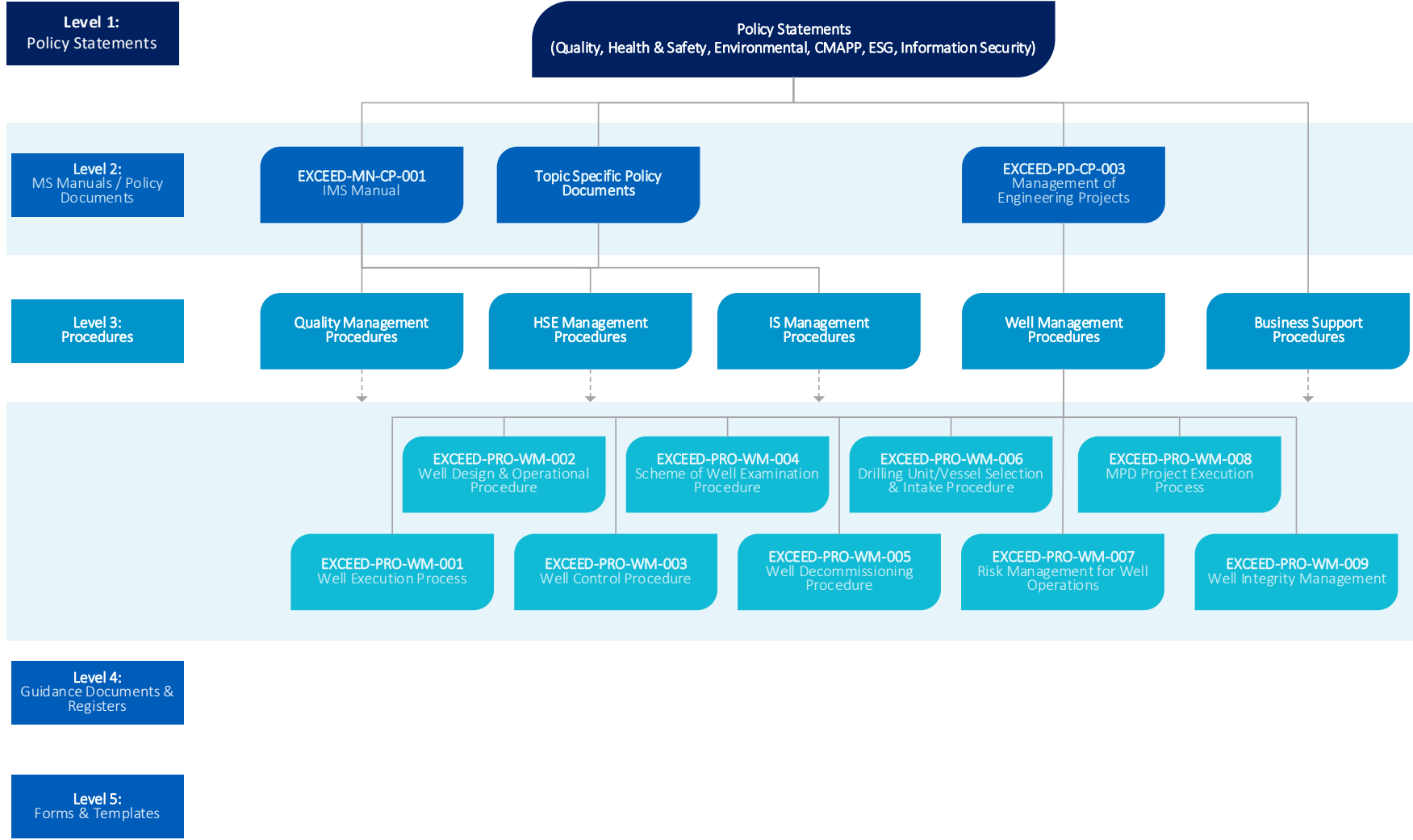
- Applicable inputs & outputs
- Process owner(s)
- Applicable responsibilities & authorities
- Applicable risks & opportunities
- Critical & supporting resources
- Acceptance criteria & methods
- Relevant objectives

Exceed also makes full use of monitoring and testing regimes to ensure the effectiveness of the high-level process documentation, as well as ensuring the process itself is fully embedded in the fabric of our operations.

4.4.2 Management System Overview



4.4.3 Well Management System Overview



5 LEADERSHIP

5.1 Leadership & Commitment

5.1.1 General

The senior management of Exceed demonstrates its leadership and commitment throughout all of its undertakings. Exceed evidences this leadership and commitment by senior management, demonstrating:

- Accountability for the effectiveness of the integrated management system
- The establishment and maintenance of Management System Policy Statements ensuring that they align with the strategic direction of Exceed
- The integration and embedding of the management system requirements into all business processes so far as is reasonably practical
- The promotion of awareness and the process approach across Exceed at all levels
- The provision of appropriate resources for the establishment, implementation, and maintenance of the management system
- The promotion of the importance of effective QHSE & IS management and conforming to the management systems requirements across Exceed at all levels
- The importance of ensuring the management system meets or exceeds its aims and goals
- Engagement with all persons within Exceed to ensure the effectiveness of the integrated management system, providing direction and support wherever required
- The promotion of continual improvement
- The promotion of leadership on integrated QHSE & IS issues of all other leaders, supervisors, and managers within Exceed. Ensuring all leaders in Exceed are supported to take ownership within their area of responsibility

5.1.2 Client Focus

Exceed's leadership has embedded a client-first approach to ensure client satisfaction. This approach involves the determination of client needs and expectations, so these needs and expectations can be converted into requirements on which our services are built. The principles we follow are:

- Assuring that client and applicable statutory and regulatory requirements are determined, understood, and consistently met
- Assuring that the risks and opportunities that can affect conformity services and the ability to enhance client satisfaction are determined and addressed
- Assuring the focus on enhancing client satisfaction is maintained

5.2 Policies

Exceed has determined and documented specific policies to govern not only the high-level strategic actions of Exceed but also the day-to-day operations of Exceed's IMS. As this document is considered to be integral to Exceed, it has been released as a standalone document, which is communicated throughout Exceed and to external parties (communication to external parties is usually upon request only). Our policy statements are contained within:

- **EXCEED-PS-CP-001** - Exceed Quality Policy Statement
- **EXCEED-PS-CP-002** - Exceed Health & Safety Policy Statement
- **EXCEED-PS-CP-003** - Exceed Environmental Policy Statement
- **EXCEED-PS-CP-004** - Corporate Major Accident Prevention Policy Statement
- **EXCEED-PS-CP-005** - ESG Policy Statement
- **EXCEED-PS-CP-006** - Information Security Policy Statement.

5.3 Organisational Roles & Responsibilities

Exceed has appointed key personnel within the organisation with the responsibilities and authorities for all relevant roles in the company. These Key personnel are made aware of their roles, responsibilities, and authorities through a combination of the Organisation Chart and Job Descriptions

Exceed has also outlined overall IMS responsibilities and authorities as follows:

Responsibility/Authority	Role
Ensuring that the management system conforms to applicable standards	QHSSE Manager
Ensuring that the processes are delivering their intended outputs	Managing Director
Reporting on the performance of the management system and providing opportunities for improvement of the management system	QHSSE Manager/Head of ICT
Ensuring the promotion of client focus throughout the organisation	QHSSE Manager
Ensuring that the integrity of the management system is maintained when changes are planned and implemented	QHSSE Manager/Head of ICT
Fully cooperate and comply with all processes and documentation established or implemented for information security.	Workers (As defined in section 3 of this manual)
Report and advise on all issues, potential issues, incidents, potential incidents, nonconformities, and potential nonconformities to the relevant person within the organisation.	Workers (As defined in section 3 of this manual)

QHSSE Manager is the single point of contact to represent Exceed IMS, as necessary for regulations and as beneficial for client relations. Other duties of the QHSSE Manager may be defined herein or within other documented information.

Exceed may make use of external providers with specialist knowledge and skills to support the QHSSE Manager as appropriate.

5.4 Consultation & Participation

Exceed has determined that consultation and participation of workers are key to the long-term success of the management system and organisation as a whole. To this end, Exceed has established, implemented and maintains processes for consultation and participation of workers at all applicable levels and functions. Exceed has defined workers within section 3 of this manual. Exceed promotes the involvement of workers

in the development, planning, implementation, performance evaluation and actions for improvement of the Integrated Management System.

Exceed has developed and implemented **EXCEED-PRO-QA-005 – Communications Procedure** to assist and govern the processes of consultation and participation of workers. Where appropriate, Exceed may also elect to consult and participate with a representation of the workers, rather than the full cohort of workers. Workers are consulted on various QHSE and Information Security issues as they relate to the management system, these include:

- Determining the needs and expectations of interested parties
- Establishing the Health and Safety policy
- Assigning organisational roles, responsibilities, and authorities, as applicable
- Determining how to fulfil legal requirements and other requirements
- Establishing health and safety, environmental, quality and ESG objectives and planning to achieve them
- Determining applicable controls for outsourcing, procurement, and contractors
- Determining what needs to be monitored, measured, and evaluated
- Planning, establishing, implementing, and maintaining an audit schedule
- Ensuring continual improvement

Workers are encouraged to participate in various QHSE and Information Security issues as they relate to the Management System, including:

- Determining the processes for consultation and participation
- Identifying hazards and assessing risks and opportunities
- Determining actions to eliminate hazards and reduce OH&S risks
- Determining competence requirements, training needs, training and evaluating training
- Determining what needs to be communicated and how this will be done
- Determining control measures and their effective implementation and use
- Investigating incidents and nonconformities and determining corrective actions

6 PLANNING

6.1 Actions to Address Risks & Opportunities

6.1.1 General

As part of the Context of the Organisation process, Exceed has identified the risks and opportunities related to the identified internal and external issues and each interested party and their associated issues. Risks and opportunities are considered and managed in different ways. Risks are managed with a focus on decreasing their likelihood and minimising their impact should they occur. Opportunities are managed to increase their likelihood and to maximise their benefits if they should occur.

Exceed has determined that risks and opportunities shall be managed separately, except where they may overlap. It should be noted that Exceed employs these processes to ensure appropriate control and management of risks and opportunities; however, for Exceed to fully exploit the benefits of the management system, a slight deviation has been created between Exceed's management system and the standards terminology. Exceed considers "uncertainty" as neutral, defines "risk" as a negative effect of uncertainty, and "opportunity" as a positive effect of uncertainty.

Exceed shall only maintain records of formal risk management where appropriate, based on the level of risk or where the records of risk assessment, risk analysis, and/or risk treatment are necessary based on legal requirements.

Records of the risks & opportunities process and outputs are maintained within the **Context Register (EXCEED-GD-QA-004)**.

6.1.2 HSE Assessments

6.1.2.1 Environmental Aspects

Exceed shall identify environmental aspects associated with our activities and services and assess them to determine which of those aspects have or can have a significant impact on the environment. The Lifecycle Perspective of the aspects is also considered.

Environmental aspects and impacts of the general business and well operations management activities carried out by Exceed are identified and evaluated, and the results are contained within the **EXCEED-FT-HSE-006 - Environmental Aspects & Impacts Register**. This register is used as a starting point for projects; these aspects and any additional aspects identified during the Project HAZID/ENVID and/or Environmental, Social Impact Assessment (ESIA), shall be recorded within the project risk register.

To ensure the generic register content remains current, it is reviewed as part of the annual management review. The QHSSE Manager maintains this register.

6.1.2.2 Health and Safety Hazard Identification

The **EXCEED-PRO-WM-007 - Risk Management for Well Operations Procedure** defines the identification process for health and safety hazards specific to the activities and operations being planned by Exceed. Techniques for identifying hazards include HAZOP, HAZID/ENVID, risk assessment, etc. Such techniques may be used by Exceed as a specific work item during planning.

Early in the well planning process, Exceed will conduct a HAZID/ENVID utilising data from various sources such as the Client, offset well analysis to identify major hazards, geological surveys, etc. The scope of the HAZID/ENVID(s) shall consider all phases of the well operation, including rig moves, drilling, well testing, completion, and tree installation as appropriate. Further discrete HAZID/ENVID sessions may also be conducted as and when required.

A HAZID/ENVID will be conducted as part of the well design review meeting, and attendees shall normally include the Exceed Project Team, Exceed technical personnel outside of the project team, as appropriate, the Drilling Contractor/Vessel Owner and key service contractor personnel. Client representatives and Well Examiner shall also be invited to attend, as appropriate. A record of the meeting shall be retained in the well file that shows:

- List of Attendees
- Date and venue
- Well/s Number/s
- List of hazards that have been identified (Note that severity, likelihood of occurrence and control measures are not identified at this stage).

6.1.2.3 Risk Assessment

For each project, several specific Risk Assessments are conducted at different stages in accordance with the **EXCEED-WM-PRO-007 - Risk Management for Well Operations Procedure**, utilising the output of the HAZID/ENVID process, in accordance with the **EXCEED-PRO-HSE-004 - Risk Assessment Procedure**.

The risk assessment process will:

- Identify and record all threats associated with the operation/aspect being assessed.
- Score the probability rating and severity rating for each threat identified from the HAZID/ENVID or otherwise, using the **EXCEED-PRO-HSE-005 - Risk Matrix**.

6.1.3 Information Security Risk Assessment & Risk Treatment

Exceed strives to ensure that information security risk assessments are undertaken, recorded, and retained, both periodically and when significant changes are proposed or occur.

Exceed treats information security risks appropriately based on the level of risk identified and the resources required to mitigate against that risk. Exceed also considers all applicable statutory, contractual, and other requirements when determining the best treatment option for information security risks.

Exceed has adopted the four Ts model for Information Security risk treatment. The treatment option for information security risks will therefore be either or a combination of the following:

- Tolerate
- Terminate
- Transfer
- Treat

Risk Assessment is undertaken as per **EXCEED-PRO-HSE-004 - Risk Assessment Procedure** and **EXCEED-PRO-HSE-005 - Risk Matrix**. All risks are tracked on the IS Risk Register.

6.1.4 Threat Intelligence

Threat intelligence involves collecting, analysing, and sharing information on existing or emerging threats. This intelligence is typically sourced from independent providers, government agencies, or collaborative groups.

Intelligence received will be reviewed and, where relevant, added to the Threat Intelligence Register. The use of threat intelligence should result in more informed actions and a reduction in potential impacts.

The Head of ICT shall select sources of threat intelligence and consider what intelligence is relevant to Exceed. The Head of ICT may then choose to take action, including but not limited to increased monitoring, cessation of a given activity, or seeking further information about the threat and its control.

6.1.5 Compliance Obligations

Existing and new Health, Safety, Environmental and Information Security legislation applicable to the activities of Exceed are identified and recorded within the legal register in the Weston Compass system. The register is reviewed and updated on a continual basis by the COMPASS system.

Review of the Environmental Aspects Register may also necessitate changes to the legal registers. Hard copies of Standards, etc., will be purchased by EXCEED as and when there is a requirement to do so.

A project specific legal register, which may develop country-specific sections for operations outside the UK, is reviewed for each project. The register highlights country-specific consent/permit and reporting requirements and is cross-referred to the Exceed project-specific Aspects and Impacts Registers.

Where required, applications for a licence, consent or permit will be submitted to the relevant regulatory authority in the required format. Responsibility for submission may be held by Exceed and/or their client and will be described in the Contract Management Plan for specific contracts. In all cases, a record of the application/submission, ongoing correspondence, response, and commitments is held by Exceed.

Review of legal compliance is performed in various ways, including:

- Well Planning Checklists
- Permit / Consents Trackers
- Commitments Registers
- Review against Health & Safety and Environmental Legal Register requirements
- Audit (internal/external)

Existing and new legislation applicable to the activities of Exceed shall be identified, in accordance with the **EXCEED-PRO-QA-004 - Identification of Legislation and Compliance Procedure**. When operating outside of the UK, the requirements of this document shall be used as guidance, and the regulations of the country

of operations shall be identified and reviewed, and a project-specific commitments register implemented to track and provide evidence of compliance with country-specific regulations.

6.1.6 Planning Action

EXCEED shall consider technological options and financial, operational, and business requirements when planning actions for significant environmental aspects, compliance obligations and risks and opportunities.

Changes to the IMS and its processes are carried out in a planned manner as per the **EXCEED-PRO-QA-014 - Management of Change Procedure**.

6.2 Management System Objectives & Planning to Achieve Them

Exceed has determined management system objectives in line with the adoption of the process approach, resulting in the use of its process objectives as the primary objectives for the management system. As such, Exceed has elected to focus on overall service-related IMS objectives. The IMS objectives are recorded in the **Annual IMS Plan**, which identifies the actions required to achieve the objectives.

To this end, Exceed has considered the following objectives:

- Objectives shall be consistent with the IMS Policies
- Objectives shall be measurable
- Objectives shall take into account applicable requirements
- Objectives shall be relevant to the conformity of products & services and enhance client satisfaction
- Objectives shall be monitored
- Objectives shall be communicated
- Objectives shall be updated as appropriate

Exceed considers and defines process objectives as part of the management review process.

6.3 Planning of Changes

Management of Change (MoC) is fundamental to safe operations on Exceed projects. Operational issues may lead to the requirement for changes to be made to programmed plans and procedures. Changes can lead to new or additional risks being introduced, placing personnel or equipment in harm's way. Exceed follows a systematic **EXCEED-PRO-QA-014 - Management of Change Procedure** to ensure that variations are fully discussed, analysed, and assessed for health, safety, or environmental risks before implementation. The procedure aims to ensure that temporary or permanent organisational, systemic or operational changes are considered for health, safety, environmental and information security implications, impact on processes, risk mitigation or acceptance before implementation and to ensure people affected by the change are aware with and understand the change itself, their role and responsibilities in the change.

7 SUPPORT

7.1 Resources

7.1.1 General

Exceed has identified and provided the necessary resources to:

- To implement and maintain the management system and continually improve its effectiveness
- To enhance client satisfaction by meeting client requirements

Resource identification and provision is, however, considered an ongoing process and as such, Exceed regularly considers the provided resources and any additional, potential and future resource needs, but as a minimum, the resource requirements will be formally considered as part of the management review process.

Exceed considers the capability and constraints of existing internal resources as well as the needs and expectations of external parties as part of its resource allocation and provision efforts.

7.1.2 People

Exceed's processes are only effective when operated by suitable people; as such, Exceed ensures that sufficient persons are provided for the successful operation of the management system and its processes.

7.1.3 Infrastructure

Exceed recognises that to serve our clients and meet their requirements, suitable infrastructure must be provided to allow our products and services to achieve conformity. Exceed provides and maintains infrastructure, including, as applicable:

- Buildings, workspace, and associated facilities
- Process equipment, hardware, and software
- Supporting services such as transport
- Information and communication technology

7.1.3.1 Management of Safety and Environmental Critical Elements (SECE)

Within the UK, when a concession owner appoints Exceed as 'Well Operator', Exceed will have specific responsibilities under the Safety Case Regulations (SCR) 2015, in addition to normal employer safety responsibilities. The **EXCEED-PRO-WM-009 - Well Integrity Procedure** and **EXCEED-PRO-HSE-013 - Management of Safety and Environmental Critical Elements Procedure** define the requirements for Exceed, acting as Well Operator, to ensure Safety and Environmental Critical equipment are identified and managed in compliance with SCR 2015.

7.1.4 Environment for the Operation of Processes

Exceed recognises that to achieve conformity of products and services a suitable working environment is required. To this end, Exceed provides, maintains, and manages a clean, safe and well-lit working environment suitable for its people and processes. Where Exceed has determined that specific environmental conditions are required for product and service outputs, these shall be identified and

suitable arrangements implemented at appropriate stages, with information on these requirements being detailed within the relevant documented information.

Exceed also takes action to consider human factors as part of the considerations of appropriate environments when human factors may reasonably be expected to impact our product and service provision.

7.1.5 Monitoring and Measuring Resources

Most measuring equipment on board drilling units is for indication only and consequently does not require calibration as per the requirements of ISO 9001 and 14001. Such equipment is, however, maintained according to the requirements of the rig's Preventive Maintenance System. Calibration of devices which may be required is not directly controlled by Exceed, as all equipment used in the performance of contracts is either Client or sub-contractor-owned and operated. Exceed, however, does monitor vendors to ensure, where necessary, that calibration management systems are in place and are effective. This is done under workface process monitoring and QHSE Vendor audit, which includes sample calibration and monitoring and measurement process as appropriate to the scope of supply.

7.1.5.1 Independent Well Examination Scheme

The Exceed Well Examination Scheme applies to all the well operations conducted on the United Kingdom Continental Shelf (UKCS) and is designed to fulfil the requirements for Well Examination in compliance with the Offshore Installations and Wells (Design and Construction) Regulations (DCR) 1996, SI 1996/913 and the Offshore Installations (Offshore Safety Directive) (Safety Case etc.) Regulations (SCR 2015) 2015, SI 2015/398. The details of the Well Examination Scheme are contained within Exceed document ref **EXCEED-PRO-WM-004**. Exceed has appointed an independent Well Examiner to manage all aspects of the scheme. A review of the Well Examiners' management processes has confirmed that this person is capable of complying with all legal duties as required.

The Exceed Well Examination Scheme is founded on risk-based principals allowing the Independent Well Examiner to use his skills, experience, and knowledge to vary the degree of examination required during well design, well construction and well operations to ensure that the appropriate measures have been employed to reduce the risks to as low as reasonably practicable (ALARP) levels.

7.1.6 Organisational Knowledge

Exceed understands that knowledge is not limited to only those factors understood through formal training, instead organisational knowledge may be, in certain circumstances, critical to the successful operation of the organisation. To this end Exceed has determined the knowledge necessary for the operation of its processes and to achieve conformity of products and services, which primarily originates from:

- Internal sources, such as lessons learned, feedback from subject matter experts, and/or intellectual property
- External sources such as standards, academia, conferences, and/or information gathered from clients or suppliers

To ensure the successful operation of Exceed's processes this knowledge is maintained and communicated to the extent necessary. This knowledge shall form part of the decision-making considerations when addressing changing needs and trends, and where necessary Exceed shall determine how to acquire or access the necessary additional knowledge.

7.2 Competence

EXCEED appreciates that to ensure the consistent high-quality of its products or services whilst minimising its impact on the environment, the information security of the organisation and ensuring the health and safety of employees, all persons working within the scope of the management system shall be suitable and competent based on appropriate technical knowledge and training to undertake their duties and responsibilities effectively.

To this end, EXCEED has established a competence management framework as described in the **EXCEED-PRO-HR-005 – Competence Assessment Procedure**.

Mandatory training is provided for new employees to introduce them to safety in the office, the need for quality, environmental and information security control and how to interface with the Exceed systems.

7.3 Awareness

Exceed shall ensure that all persons working within the scope of the management system are aware of the following, as a minimum:

- The IMS Policies
- Relevant quality, environmental, health & safety and information security objectives
- Their contribution to the effectiveness of the management system, including the benefits of improved performance related to actual or potential environmental impacts associated with their work
- The implications of not conforming to the management system requirements

7.4 Communication

Exceed communicates both with internal and external parties to ensure that the management system meets its objectives and areas of improvement to the organisation, and its management system can be identified and acted upon.

To this end, Exceed makes use of the following as a means of communication:

- Use of corrective and preventive action processes to report nonconformities or suggestions for improvement
- Use of the results of the analysis of data
- Meetings (periodic, scheduled and/or unscheduled) to discuss aspects of the IMS
- Use of the results of the internal audit process
- Regular company meetings with all employees
- Internal emails

- Notifications on noticeboards

The communication processes are defined in the **EXCEED-PRO-QA-005 - Communication Procedure**.

7.5 Documented Information

7.5.1 Control of Documents

Exceed documents are controlled as detailed within **EXCEED-PRO-QA-001 - Document Control and Management of Records**. Documents generated by Exceed shall, as a minimum, contain the following:

- Identifiable as being generated by Exceed
- Document title
- Document reference number
- Revision Status

The document ownership, review requirements and review/revision history are held on controlled documents registers. The Exceed Document Controller controls all the Management System Documents (Policies, Arrangement, Procedure, Guidance and Forms and Templates), keeping a Master Documents Register for these. These documents all have specific “owners” and are reviewed periodically. The document hierarchy is described within section 4.4.2 Management System Overview.

Further, documentation of an external origin, including records, will be temporarily held as part of the project/well files. On completion of the project / well, or as required, such files will be passed to the Exceed Document Controller for longer-term storage and finally archiving.

All “master” documents are held by the Document Controller in their source format (MS Word, Excel, etc). All user versions are available on SharePoint in read-only format; however, Excel will be fully functional. All printed copies, that are not formally issued, shall be considered ‘uncontrolled’.

Document owners are responsible for ensuring that the content of key documents remains current by the review and revision process. If modifications are required, the owner shall facilitate the required changes (including any necessary approval) and forward the document (with its changes) to the Exceed Document Controller for upload to the Exceed Intranet and for controlled distribution and withdrawal of obsolete paper versions as required.

Project-specific documents and plans are generated as required by every project. These are based primarily on the templates described above but become “living project” documents that evolve as the project progresses. These documents are raised, controlled and logged following a strict numbering regime. Such documents are managed by the Project Manager in line with the **EXCEED-PRO-QA-001 - Document Control and Management of Records** procedure ensuring that a Project Master Document Register is created and maintained.

7.5.2 Control of Records

Exceed ensures that records that evidence compliance with the requirements are maintained suitably to ensure their safe retrieval and ongoing legibility.

Types of records may include:

- Legal consents, permits, etc.
- Final versions of the project-specific “documents” see above
- Correspondence (from regulators, partners, etc.)
- Meeting minutes
- Performance data
- Reports
- Plans and/or drawings
- Audit reports
- Training records

Project records are produced as the “Final Deliverable” in various files for the Client and other parties. These are managed as per **EXCEED-PRO-ICT-001 - Data Management Procedure**. The required contents of such files are governed by procedure, as is the requirement for the extent of distribution.

All hard copy records, required to be retained by Exceed, are collected in the relevant project / well files or the subject folder until the material is passed to the Exceed Document Controller for archiving.

Where appropriate, an index of records shall be maintained to facilitate recovery, and the Exceed Document Controller will ensure that hard copy archives are managed via a specialist supplier.

8 OPERATION

8.1 Operational Planning & Control

8.1.1 General

Exceed establishes suitable plans and develops the processes needed for the realisation of its outputs. These plans are established as per the requirements of the management system and its other subordinate processes, whilst taking the context of the organisation's information, resources and capabilities, clients, and legal requirements into consideration.

Exceed undertakes these planning activities through:

- Determining the requirements for the product or service, ensuring that the environmental requirements are addressed in the design and development process for the product or service, considering each life cycle stage
- Establishing criteria for the processes and the acceptance of the product or service
- Communicating relevant environmental requirements to external providers, including contractors
- Consider the need to provide information about significant environmental impacts associated with transport delivery, use, end-of-life treatment and final disposal of its products and services
- Determining the resources needed to achieve conformity to the service requirements
- Implementing control of the processes as per the criteria
- Determining, maintaining, and retaining documented information to the extent necessary to have confidence that the processes have been carried out as planned and to demonstrate the conformity of services to their requirements

Exceed is engaged in the “Provision of well project management, performance improvement services and technical personnel to the energy sector”.

Well design may be part of the scope of an Exceed contract, and this necessitates the development of two principal planning documents.

A Contract Management Plan is developed following contract award, and this document will establish the management control necessary to fulfil client requirements.

The second planning document utilised within a wells project is the Operational (Drilling/Testing/Completion/Well Services/Decom) Programme. This document is created following the development of the well design and is a detailed work instruction provided to the Drilling Contractor to define how programme objectives will be satisfied.

8.2 Requirements for Products and Services

8.2.1 Client Communication

Exceed ensures effective understanding of client requirements through appropriate communication with clients and potential clients.

Exceed has identified the key areas of communication with clients as:

- Product and service provision
- Receipt of client requirements from enquiries, contracts, or orders
- Understanding of changes to client requirements
- Feedback on our performance, including reviews, satisfaction & complaints
- Processes for handling and/or control of client property
- Understanding of any unique or specific requirements for contingency actions, if applicable

Formal procedures have been established within the Management System to describe the arrangements for communicating with the Client. These include:

- Client Proposal/Tendering Procedure (**EXCEED-PRO-BM-003**)
- Contract Management (Quality) Plans
- Client complaints process
- Client feedback process (using Customer Feedback Form (**EXCEED-FT-QA-015**))

8.2.2 Determining the Requirements Related to Products and Services

Determination of requirements related to well management services has a formal process whereby client requirements are reviewed, and Exceed's ability to meet stated and undefined requirements is determined. This process is described in the **EXCEED-PRO-BM-003 - Client Proposal/Tendering Process**.

8.2.3 Review of Requirements Related to Products and Services

Exceed endeavours to provide products and services which meet or exceed the requirements of clients. To achieve this aim, Exceed undertakes a review of the technical, commercial and statutory requirements before accepting any scope of work to ensure client expectations can be met or exceeded. These review activities are defined within the **EXCEED-PRO-BM-003 - Client Proposal/Tendering Process**.

Exceed only accepts those scopes of work, in which the review has successfully determined that:

- All requirements specified by the client, including requirements for delivery and post-delivery activities, can be met or exceeded
- Any requirements not stated by the client, but which Exceed knows as being necessary, can be met or exceeded
- All requirements determined necessary by Exceed itself can be met or exceeded
- All related statutory and regulatory requirements can be met or exceeded
- Any contract or order requirements differing from those previously expressed (i.e., from a previous organisation quote) have been identified and will not prevent any requirements from being met

Any reservations or anomalies are identified, documented and discussed with the client before contract acceptance and any subsequent amendments to the contract or service are formally identified and agreed.

8.2.4 Changes to Requirements for Products and Services

Through the normal course of operations, Exceed accepts that it may become necessary to alter the original requirements stipulated. As such, Exceed shall ensure that any such change is appropriately

controlled to mitigate risks and ensure Exceed's continued ability to meet or exceed all relevant requirements of products and services. These alterations to requirements shall be executed as per the **EXCEED-PRO-QA-014 - Management of Change**.

8.3 Design and Development of Products and Services

8.3.1 General

Exceed, dependent on contract scope, may develop a well design and operations programme.

Exceed covers the requirements identified above in detailed design outputs for all new designs and for all significant design changes. Exceed ensures that the design outputs address performance, reliability, maintainability, testability, and safety issues.

Exceed has identified the key process to be followed for design and development as follows:

- Undertaking design planning
- Identification of design inputs – (capturing & recording appropriate requirements)
- Identification of design outputs – (capturing & recording of intentions and expected outputs)
- Creation of design outputs – (under controlled conditions)
- Undertaking of design reviews, verification, and validation as appropriate
- Identification of design change requirements – (capturing & recording design changes) (return to first stage)

8.3.2 Design and Development Planning

On award of contract, the assigned Project Manager, responsible for the planning, design and execution of the Project, is assigned. Dependent on scope, the process is managed as per the following procedures:

- **EXCEED-PRO-BM-004** - Project Initiation Process
- **EXCEED-PRO-WM-001** - Well Execution Process (WEP) Procedure
- **EXCEED-PRO-WM-002** - Well Design & Operational Procedure
- **EXCEED-PRO-WM-005** - Well Decommissioning Procedure
- **EXCEED-PRO-WM-008** - MPD Project Execution Process

8.3.3 Design and Development Inputs

EXCEED-PRO-WM-002 - Well Design & Operational Procedure defines the process under which the design inputs are obtained. Design input includes Environmental and Safety Issues.

8.3.4 Design and Development Controls

Exceed controls the design and development process as per the **EXCEED-PRO-WM-002 - Well Design & Operational Procedure**. Upon completion of the design, the Wells Project Manager is responsible for ensuring that the design is internally reviewed by an appropriately qualified group (including specialists where appropriate).

During the design process and in particular during the casing/tubing design process, the Wells Project Manager shall ensure that appropriate verification checks are carried out by the Design Engineer. This shall

include a check on the appropriateness and accuracy of calculations, the implementation of sound engineering and good oilfield practice, compliance with legislative and regulatory requirements, and compliance with client and company policy and procedures. Records shall be maintained in the design document of all check calculations.

As each well is a discrete product, validation can only be completed as the Drilling and Completion Programmes are executed.

UK safety regulations require that the design of all wells is independently examined by a competent person before the authority is 'notified' of the intention to drill the well. Exceed has developed a formal procedure setting out the principal controls for the **EXCEED-PRO-WM-004 - Well Examination**, supported by the guidance document **EXCEED-GD-WM-007 – Preparation of Well Operations Notifications**.

The independent Well Examination is an additional check on the appropriateness of the well design and is distinct from the other verification activities previously described. The emphasis on the checks carried out at this stage is to ensure that the risks to personnel and the environment during execution of the well operations are as low as reasonably practicable (ALARP) and that the risk of unplanned escape of well fluids is avoided.

8.3.5 Design and Development Outputs

The design process is documented in **EXCEED-PRO-WM-002 - Well Design & Operational Procedure**. The development of the design is a formal process and is documented in the appropriate well design file, parts of which are subsequently incorporated in the 'Well Examination Document' required under the (Offshore Installations and Wells) Design and Construction Regulations (only applicable in UKCS). The design outputs are expressed in a format that facilitates verification and validation processes and typically demonstrate the following:

- Design-input requirements have been met
- Design document contains or references acceptance criteria
- The design highlights safety control elements

The appropriate Wells Project Manager is responsible for ensuring that the design output documents are reviewed and are correct before they are released for independent examination.

8.3.6 Design and Development Changes

All changes to the design shall be recorded and shall go through the same system of review and approval as the original design. For UKCS operations, design changes proposed after independent Well Examination or OMAR Notification shall likewise be recorded and shall be reviewed by the independent Well Examiner before implementation.

8.4 Control of Externally Provided Processes, Products and Services

8.4.1 General

The Exceed Logistics Department function is responsible for the purchase, storage and dispatch of materials, parts, equipment and services required by the company. The **EXCEED-PRO-QA-016 -**

Procurement Management Procedure has been established to describe the nature and extent of controls to be achieved in the purchase of materials. Whilst **EXCEED-PRO-QA-016 - Procurement Management Procedure** details the arrangements for obtaining goods and services related to well operations projects, Exceed has in place the Exceed Purchase Order System (EPOS) for procuring goods and services that are outside the scope of projects and for goods and services for which Exceed cannot back-charge the client.

8.4.2 Type and Extent of Control

The **EXCEED-PRO-QA-016 - Procurement Management Procedure** identifies and authorises purchasing requirements. The procedures express the necessity for requirements to be sufficiently well described to be procured, to include, where applicable:

- Requirements for approval of product, procedures, processes and equipment
- Requirements for the qualification of personnel
- Quality Management System requirements

Where specified by the contract, the Client or their representative shall be afforded the right to verify at source or upon receipt that the product conforms to specified requirements.

8.4.3 Evaluation of Subcontractors

Subcontractors and suppliers are selected based on their ability to satisfy contract requirements. A formal procedure of Vendor Approval (contained within **EXCEED-PRO-QA-016**) has been established, which qualifies vendors based on one or more of the following criteria:

- Past performance
- Appropriate third-party QHSE approval
- Client specification
- Satisfactory assessment result of a returned QHSE questionnaire
- Site visit / Vendor audit

Where the activity of a vendor has a significant impact on the quality, safety, environmental and/or information security aspects of a project, supplementary assessment may be undertaken before the approval of the vendor. Technical support in the development of detailed specifications and the review and evaluation of vendors is available internally.

A list of Approved Vendors is centrally available and maintained by the C&P Department.

Supplier performance data from vendor audit and project feedback shall be maintained by the QHSSE Manager, and appropriate action taken where unsatisfactory vendor performance is detected.

8.5 Production and Service Provision

8.5.1 Control of Production and Service Provision

Exceed controls service provision through the consideration of the following, as applicable:

- The availability of documents or records that define the characteristics of the services, as well as the

results to be achieved.

- The availability and use of suitable monitoring and measuring resources.
- The implementation of monitoring and measurement activities.
- The use of suitable infrastructure and environment.
- The appointment of competent persons, including any required qualifications.
- The validation and revalidation of special processes if applicable (see below).
- The implementation of actions to prevent human error.
- The implementation of release, delivery and post-delivery activities.

Control of a project is achieved through the development and implementation of requirements contained within the following documents.

- Contract Management (Quality) Plans
- Well Execution Process / Decommissioning Design and Execution Process
- Drilling/Testing/Completion Programme
- MS Interface Document

Systems are in place and are documented within the process control documentation for the monitoring and measurement of parameters and criteria, which enable the conformance to requirements to be verified.

Close liaison between the management of Exceed, the client and the drilling contractor ensures that program objectives are achieved and that appropriate remedial or adaptive control measures are taken.

Control of the project is achieved through the implementation of the Operational Programme, with verifications being carried out by senior operations personnel and the Wells Project Manager. For development wells, where a production or injection well is “handed over” to the client, Exceed implements well handover as part of the Well Execution process, following **EXCEED-GD-WM-008 - Well Handover Guidance** to ensure all Client requirements have been satisfied and an auditable trail of documentary evidence exists.

Well records include:

- Daily Operations Report
- Testing/Completion Reports
- End of Well Reports
- Well Status Diagram
- Certificate of Well Status (COWS) – where appropriate

8.5.2 Identification and Traceability

Where appropriate, Exceed has established systems by which the product or service can be identified uniquely. Each well is designated a unique identification number, and this is referenced in relevant project

documentation. Where relevant, the identity and traceability of equipment or material used in the well operations process is preserved, and records are maintained.

8.5.3 Property Belonging to Clients or External Providers

Exceed, as part of its normal activities, may be in control of property not owned by Exceed; as such, Exceed has established and implemented processes to ensure that all property under the organisation's control, but which is not owned by Exceed, is suitably protected. Where Exceed is in control of third-party property, all reasonably practicable steps and care shall be taken to protect the property. The steps taken by Exceed will include, as applicable:

- Identification upon receipt of the property
- Verification of the property
- Appropriate controls implemented to safeguard the property from intentional or unintentional harm
- Establishment of a process for notification to the owner of the property of harm or potential harm sustained by the property
- Maintenance of records of the property, actions taken, and issues sustained
- Establishment of a process for the return of the property

Where Exceed is in control of intellectual property not owned by Exceed (e.g., client-furnished data used for design, production and/or inspection), this is identified, maintained, and preserved to prevent accidental loss, damage or inappropriate use as per **EXCEED-PRO-ICT-004 - Information Classification, Handling & Secure Transfer Procedure** and **EXCEED-PRO-ICT-001 - Data Management Procedure**

8.5.4 Preservation

Exceed has established procedures for ensuring that the integrity of the product (the well) is maintained and preserved. Preservation procedures include materials and equipment used in the operations process, as well as materials used in the well itself. These processes are detailed within the Well Execution Process (**EXCEED-PRO-WM-001**) and the Well Decommissioning Procedure (**EXCEED-PRO-WM-005**).

8.5.5 Post-Delivery Activities

Exceed executes all post-delivery activities as per the management system and predetermined requirements. As part of this process, Exceed considers:

- Statutory and regulatory requirements
- The potential undesired consequences associated with its services
- The nature of use and intended lifetime of its services
- Client requirements
- Client feedback

8.5.6 Control of Changes

Should Exceed be subject to a planned or unplanned change, this is controlled and managed appropriately to ensure continued conformance of products and services within internal requirements, continued conformity with legal, contractual, client and international standard requirements and in such a manner

that risks are identified and mitigated against. The process is detailed within the **EXCEED-PRO-QA-014 - Management of Change Procedure**.

8.6 Release of Products and Services

Exceed ensures that no products and services are received by clients which do not meet or exceed their requirements through the establishment and implementation of an acceptance programme with pre-determined acceptance criteria. Exceed undertakes reviews, inspections, and tests at appropriate stages to verify that the requirements have been met. Exceed allows for each process to utilise different methods for measuring and releasing products and services; as such, these requirements are identified within relevant documented Information.

8.7 Control of Nonconforming Outputs

If a product and or service does not conform to the predetermined requirements, Exceed shall take control of that situation to prevent the product or service from being released to the client or used in subsequent processes. These actions are detailed in the **EXCEED-PRO-QA-002 – Audit, Non-conformance, Corrective & Preventative Action Procedure**.

8.8 Emergency Preparedness & Response

As part of the well planning process, Exceed identifies all potential emergencies via our risk assessment or through the aspects and impacts evaluation processes. Following on from the identification of potential emergencies, Exceed ensures that the correct resources are in place for managing the emergency to minimise any impact on personnel or the environment. Project-specific arrangements are developed for responding promptly and effectively to any emergencies which may arise. Such arrangements specify the key personnel, operating procedures and supporting information necessary for an effective response. For well operations, primacy for response to a Health and Safety incident will normally be managed by the drilling contractor, and the response to a pollution incident will be managed by Exceed and the client. Arrangements for dealing with emergency response shall be detailed within the project-specific Emergency Response Plan (ERP).

In addition to the project ERP, additional emergency response plans such as Oil Pollution Emergency Plans (OPEPs), relief well planning and **EXCEED-PRO-WM-003 - Well Control Procedure**, will be put in place as appropriate.

Arrangements will be tested both offshore and onshore with sufficient frequency to ensure their continued appropriateness and the competence of personnel (Exceed and others) as per their particular responsibilities. Lessons learned from exercises, drills or actual incidents will be reflected through amendment of relevant procedures and plans.

Where additional resources are required, e.g., OSRL response resources, access to capping devices, etc. Exceed shall have written arrangements in place with our clients to delegate call-out responsibility to Exceed, to ensure that these resources can be called upon if required.

EXCEED-PRO-HSE-009 - Incident Management, EXCEED-PRO-HSE-011 - Onshore Oil Pollution Emergency Plan (OPEP) UKCS and EXCEED-PRO-HSE-014 - Crisis Management procedures provide more detail on the processes undertaken.

8.9 Eliminating Hazards and Reducing OH&S Risks

Further to section 6.1.2 HSE Assessments, Exceed determines control measures for each hazard and records these on the Risk Assessment Template (EXCEED-FT-HSE-003). Control measures shall be established following the hierarchy of control, i.e.:

- Elimination
- Substitution
- Engineering controls
- Procedural controls
- Reduction in personnel/time exposure
- Personal protective equipment (PPE).

Once the control measures have been established for each hazard/aspect, the initial risk assessment is re-evaluated to determine the Residual Risk. The purpose of the re-evaluation is to reduce the operation to as Low a risk ranking as reasonably practicable. If a task is of a “Low” value during the initial risk assessment, then control measures should still be applied to reduce the risk to As Low as Reasonably Practicable.

The results of the HSE hazard, environmental aspects and associated risk identification and assessment, including the preventative and reactive risk control and recovery measures, shall be documented together with implementation action plans.

When operations commence, the Wells Project Manager and Senior well Site Leader shall use the HAZID/ENVID and documented Risk Assessments at the pre-spud and pre-phase meetings to ensure that all key personnel on the rig are aware of the threats and control measures to be adopted. The Senior Well Site Leader shall provide feedback to the Well Project Manager if additional risks or control measures are identified, in which case the Risk Assessment shall be revised and re-issued.

The risk management process is detailed within the **EXCEED-PRO-WM-007 - Risk Management for Well Operations Procedure**.

Further to the above, during operations, Exceed rig site personnel shall support the Drilling Contractor’s Permit to Work System, which shall include requirements for task-based Risk Assessment to be carried out and by attending pre-job meetings and by checking on the rig that all personnel are aware of task hazards and control measures.

The same risk assessment process is followed for office-based risk assessments.

8.10 Information Security Risk Assessment & Treatment

Exceed undertakes information security risk assessments as per **EXCEED-PRO-HSE-004 - Risk Assessment Procedure**, and these are recorded in the IS Risk Register & Treatment Plan.

9 PERFORMANCE EVALUATION

9.1 Monitoring, Measurement, Analysis & Evaluation

9.1.1 General

Exceed has established processes for the monitoring, measurement, analysis & evaluation of the management system, Contract Management Plans and any other factors it elects to monitor, measure, analyse and evaluate. Exceed, having established the processes for monitoring, measurement, analysis, and evaluation, has defined the issues it intends to monitor, how these issues will be measured, how the issues will be analysed and evaluated, and assigned responsibility for these activities accordingly.

Exceed will monitor and measure organisational performance primarily through the review of the effectiveness of processes defined in Section 4.4 of this manual, as well as other factors identified in subordinate documented information. The monitoring and measurement activities will provide Exceed's leadership with the key information to analyse and evaluate organisational performance.

9.1.2 Client Satisfaction

Exceed has determined client satisfaction to be a key issue in the success of the management system and the business as a whole, as such, a key emphasis has been placed upon the feedback of clients, particularly where this feedback relates to conformity of products and services to clients' requirements or potential areas of improvement identified by the client.

Exceed measures client perception of its performance throughout the project and during end of well reporting. Following contract completion, the Wells Project Manager and Client meet and actively review performance.

Unsatisfactory levels of performance are investigated and, where appropriate, Improvement Reports (IRs) are raised as per the **EXCEED-PRO-QA-002 - Audit, Non-conformance, Corrective and Preventative Action Procedure**.

9.1.3 Analysis & Evaluation

Exceed uses the information gathered from monitoring and measurement activities to analyse and evaluate the performance of Exceed. The performance of Exceed is analysed and evaluated by considering:

- The conformity of products and services
- The extent to which clients have been satisfied with our product and service offerings
- The extent to which the integrated management system has been successful and or effective
- The extent to which planning has been effectively implemented
- The extent to which actions taken to address risks & opportunities have been effective
- The extent to which external providers have achieved our performance requirements
- Any areas of improvement that have been made or could be made to ensure the effectiveness of the integrated management system

9.1.4 Evaluation of Compliance

Exceed has an established, implemented and maintained process for evaluating compliance with health, safety and environmental legal requirements and other requirements.

Exceed:

- Determines the frequency (annually) and method for the evaluation of compliance
- Evaluates compliance and acts if needed
- Maintains knowledge and understanding of its compliance status with legal requirements and other requirements
- Retains documented information on the compliance evaluation results

Compliance obligations are managed as per the **EXCEED-PRO-QA-004 - Identification of Legislation and Compliance Procedure**. This procedure defines how Exceed manages legal and other compliance obligations to satisfy requirements. The legal/other requirements, as well as the control measures to ensure compliance by Exceed, are documented in the Weston Compass system.

9.2 Internal Audit

Exceed uses various means to ensure the effectiveness of the integrated management system. Exceed has, however, determined internal audits as the key method of measuring the success and effectiveness of the management system. Exceed, therefore, undertakes internal audits at planned intervals as per the organisation's **Internal Audit Schedule**. Exceed carries out these audits to determine the extent to which Exceed's management system conforms to the requirements of ISO 9001, ISO14001, ISO45001 and ISO27001, as well as the extent to which the IMS system has been embedded and adhered to within Exceed. Exceed has established, implemented, and maintains **EXCEED-PRO-QA-002 - Audit, Non-conformance, Corrective & Preventative Action Procedure** to control internal auditing activities.

Exceed may conduct similar (vendor) audits on its key contractors. These audits will, in turn, check that key contractors have an audit programme in place to demonstrate their (and their sub-contractors) conformance with the relevant HSE Management Systems in place.

In addition to the aforementioned audits, on a project-by-project basis, evaluation of the contracted drilling unit's HSE management system will be assessed as part of the Drilling Contractors Management System audit. Exceed expects that the system should aspire to meet, but not necessarily be certified to, ISO 14001 and ISO 45001 or an equivalent. Additionally, any drilling unit which will use OBM as part of the well operation will be audited as directed by Exceed in accordance with the **EXCEED-PRO-WM-006 – Drilling Unit/Vessel Selection and Intake Procedure**, to ensure that all drains, deck and machinery bunding, drains collection tanks, mud pit and cement displacement tank dump lines and valves, cuttings transfer equipment, bulk hoses and fittings are operated and maintained in a manner that prevents any overboard discharge.

9.3 Management Review

Exceed's leadership are fully committed to ensuring the effectiveness of the management system, and as such, undertakes a formal review of the management system and its effectiveness at planned intervals.

The Leadership team also use this time to determine:

- Changes to Internal & External Issues
- Changes to Needs & Expectations of Interested Parties
- Effectiveness of Risk & Opportunities
- Legal & other requirements
- IMS Policy Review
- Objectives Review
- Process Performance & Conformity of Products & Services
- Incidents, NCRs & Corrective Actions
- Monitoring & Measuring Results
- Audit Results
- Consultation & Participation
- Review of Resources
- Client Feedback & Satisfaction
- Results of IS risk assessments & status of risk treatment plans
- External Provider's Performance
- Communication
- Opportunities for continual improvement

Exceed undertakes these management reviews as per **EXCEED-PRO-QA-003 - IMS Management Review Procedure** and retains evidence of these reviews in the form of minutes and any other supporting documentation. Where appropriate, the leadership team shares the outputs of the management review with the wider organisation.

10 IMPROVEMENT

10.1 General

Exceed and its people continually seek to improve our product and service offering, our culture, as well as our processes. Exceed views the management system as the key catalyst to allow for our improvements to be identified, implemented, and evaluated. We seek to make these improvements to ensure we are fully addressing the needs and expectations of our clients and any other applicable interested parties.

Exceed makes these improvements through analysis and evaluation of information relating to:

- The conformity of products and services produced
- The degree of our clients' satisfaction
- The effectiveness of planning and any planning-related actions
- The performance of our external providers, etc.
- The effectiveness of actions taken to address risks and opportunities
- The performance and effectiveness of the management system
- Other improvements to the management system

10.2 Nonconformity & Corrective Action

Wherever Exceed identifies significant issues of nonconformities, Exceed take immediate action to resolve the issues and prevent the issue from getting worse, and wherever appropriate, we devise and then implement solutions to eliminate the cause of the issue and prevent a recurrence. Exceed records details of these issues and the actions taken within the **NCR Register** as per our **EXCEED-PRO-QA-002 - Audit, Non-conformance, Corrective & Preventative Action Procedure**

10.3 Incident Investigation

Exceed and its leadership strive to ensure that all person impacted by our operations are safe and healthy and their wellbeing is protected in so far as is under Exceeds control. As part of this philosophy, Exceed ensures that should an incident occur that either does or has the potential to adversely affect our employees or other applicable stakeholder's health safety or well-being or the business, we investigate the issue appropriately to determine the events and activities that resulted in the adverse event.

These investigations are carried out objectively by a suitably competent incident investigator in an appropriate timeframe to ensure that the root cause of the incident can be identified and rectified to prevent incidents of a similar nature. These investigations are then reported to Exceed's leadership and reviewed thoroughly. All incidents are investigated as per the **EXCEED-PRO-HSE-001 - Incident Reporting & Investigation Procedure**.

Lessons learned shall be communicated to other interested parties and reflected, where appropriate, in the way in which future operations and activities are conducted. Appropriate levels of management shall be engaged in the review of events, so that an effective response can be made.

10.4 Continual Improvement

Exceed is committed to continual improvement across all business aspects, including our product and service offering, our performance, our culture, our management system, and our processes. To this end, Exceed has established, implemented, and maintains several avenues to ensure continual improvement, including:

- Management Reviews
- Internal Audits
- Open-door approaches by leadership
- Instilling a challenge mentality throughout our workforce
- An opportunity for improvement system
- Lessons Learned Database

All of these methods allow our organisation to continually improve the suitability, adequacy, and effectiveness of the integrated management system.

11 REFERENCES

EXCEED-PS-CP-001	Exceed Quality Policy Statement
EXCEED-PS-CP-002	Exceed Health & Safety Policy Statement
EXCEED-PS-CP-003	Exceed Environmental Policy Statement
EXCEED-PS-CP-004	Corporate Major Accident Prevention Policy Statement
EXCEED-PS-CP-005	ESG Policy Statement
EXCEED-PS-CP-006	Information Security Policy Statement
EXCEED-PRO-BM-003	Client Proposal/Tendering Process
EXCEED-PRO-BM-004	Project Initiation Process
EXCEED-PRO-HR-005	Competence Assessment Procedure
EXCEED-PRO-HSE-001	Incident Reporting and Investigation Procedure.
EXCEED-PRO-HSE-004	Risk Assessment Procedure
EXCEED-PRO-HSE-005	Risk Matrix
EXCEED-PRO-HSE-009	Incident Management
EXCEED-PRO-HSE-011	Onshore Oil Pollution Emergency Plan (OPEP) UKCS
EXCEED-PRO-HSE-013	Management of Safety and Environmental Critical Elements Procedure
EXCEED-PRO-HSE-014	Crisis Management
EXCEED-PRO-ICT-001	Data Management Procedure
EXCEED-PRO-ICT-004	Information Classification, Handling & Secure Transfer Procedure
EXCEED-PRO-QA-001	Document Control and Management of Records
EXCEED-PRO-QA-002	Audit, Non-conformance, Corrective and Preventative Action Procedure
EXCEED-PRO-QA-003	IMS Management Review Procedure
EXCEED-PRO-QA-004	Identification of Legislation and Compliance Procedure.
EXCEED-PRO-QA-005	Communications Procedure
EXCEED-PRO-QA-014	Management of Change Procedure
EXCEED-PRO-QA-016	Procurement Management Procedure
EXCEED-PRO-WM-001	Well Execution Process (WEP) Procedure
EXCEED-PRO-WM-002	Well Design & Operational Procedure
EXCEED-PRO-WM-003	Well Control Procedure
EXCEED-PRO-WM-004	Scheme of Well Examination
EXCEED-PRO-WM-005	Well Decommissioning Procedure
EXCEED-PRO-WM-006	Drilling Unit/Vessel Selection and Intake Procedure
EXCEED-PRO-WM-007	Risk Management for Well Operations Procedure
EXCEED-PRO-WM-008	MPD Project Execution Process
EXCEED-PRO-WM-009	Well Integrity Procedure
EXCEED-GD-QA-004	Context Register
EXCEED-GD-WM-007	Preparation of Well Operations Notifications
EXCEED-GD-WM-008	Well Handover Guidance
EXCEED-FT-HSE-003	Risk Assessment Template
EXCEED-FT-HSE-006	Environmental Aspects & Impacts Register
EXCEED-FT-QA-015	Customer Feedback Form



EXCEED-MN-CP-001 - Integrated Management System Manual Rev 1

Final Audit Report

2026-02-23

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