



EXCEED

Leading Energy Transformation

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APPROVAL & ISSUE SUMMARY

Document Approval

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Issue Summary

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

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1 INTRODUCTION

1.1 Purpose

This guidance document provides an overview of the Exceed integrated QHSE Management System (QHSEMS).

Exceed considers the systematic implementation of effective QHSEMS to be vital to the success of our business objectives. Clear and timely direction of QHSE matters is essential to secure quality, assure regulatory compliance and prevent injuries, incidents, losses, environmental damage, non-compliance, fines, remedial work, schedule impact and delays. The QHSEMS provides the framework for the systematic management of QHSE across the Exceed organisation and aims to ensure the delivery of safe, environmentally responsible and reliable operations in accordance with defined policies, practices, processes and standards.

The structure and content of the QHSEMS recognises the principles of HSG65 (Managing for health and safety) and is externally certified to ISO 45001:2018 (Occupational Health and Safety Management Systems), ISO 14001:2015 (Environmental Management Systems) and ISO 9001:2015 (Quality Management Systems) and ensures that risks to the health and safety of personnel and to the environment are reduced to As Low As Reasonably Practicable (ALARP).

1.2 Scope

This guidance document provides a high-level overview of the arrangements in place to manage Exceed's HSEQ arrangements and applies to all Exceed Holdings and subsidiary operating company activities. The Exceed organisation is summarised in the following figure.

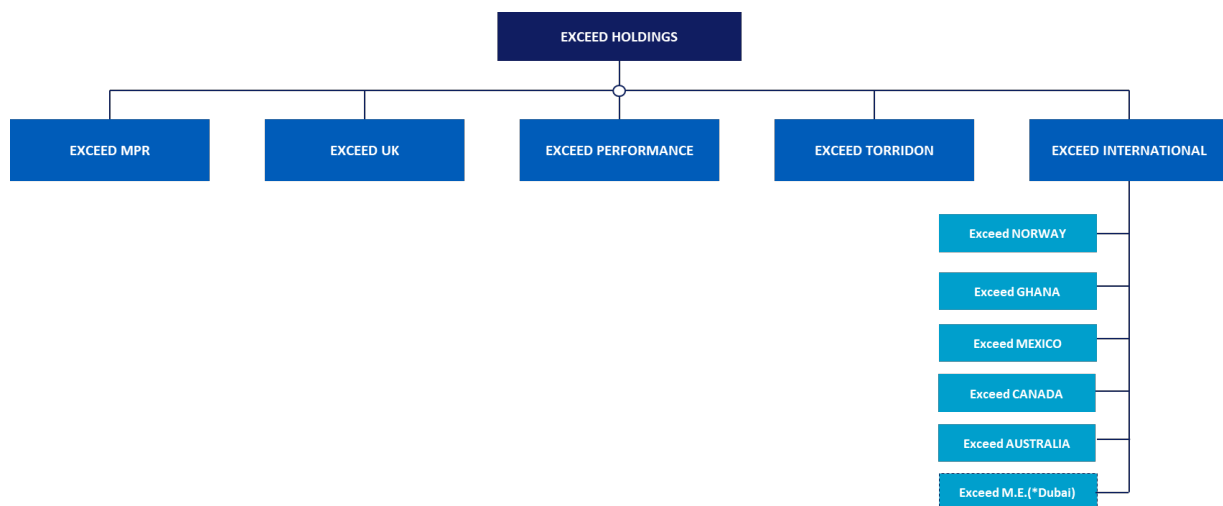


Figure 1.1 – Company Structure

2 ORGANISATION

2.1 Management Structure

The Managing Director (MD) has overall responsibility for implementing the QHSE Policies, the setting of objectives and targets against which the overall achievement of Exceeds QHSE performance can be measured and for ensuring periodic review as circumstances dictate. He is supported in the delivery of his responsibilities in relation to health, safety and environmental management by a multi-disciplinary Leadership Team as illustrated in the company organisation chart (Figure 2.1).

The day-to-day activities of Exceed are managed by the Senior Management Team comprising of the MD, the seven Board Members, UK Wells Manager and QHSSE Manager.

The organisational structure promotes efficient communications between the Senior Management Team, the onshore project teams, and offshore operations Teams. Protocols are in place for the escalation of information from the onshore project teams and offshore operations organisation to the Senior Management Team, in the event of a major incident or an identified failing in the Exceed QHSE MS.

The Directors of Exceed are responsible and accountable for compliance with applicable legislation, QHSE Policies, Corporate Major Accident Prevention Policy (CMAPP), and QHSE procedures, and driving performance improvement across all Exceed onshore and offshore operations.

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- BOARD MEMBER
- BUSINESS DEVELOPMENT
- OPERATIONS STAFF
- SUPPORT STAFF

Exceed Organisational Chart

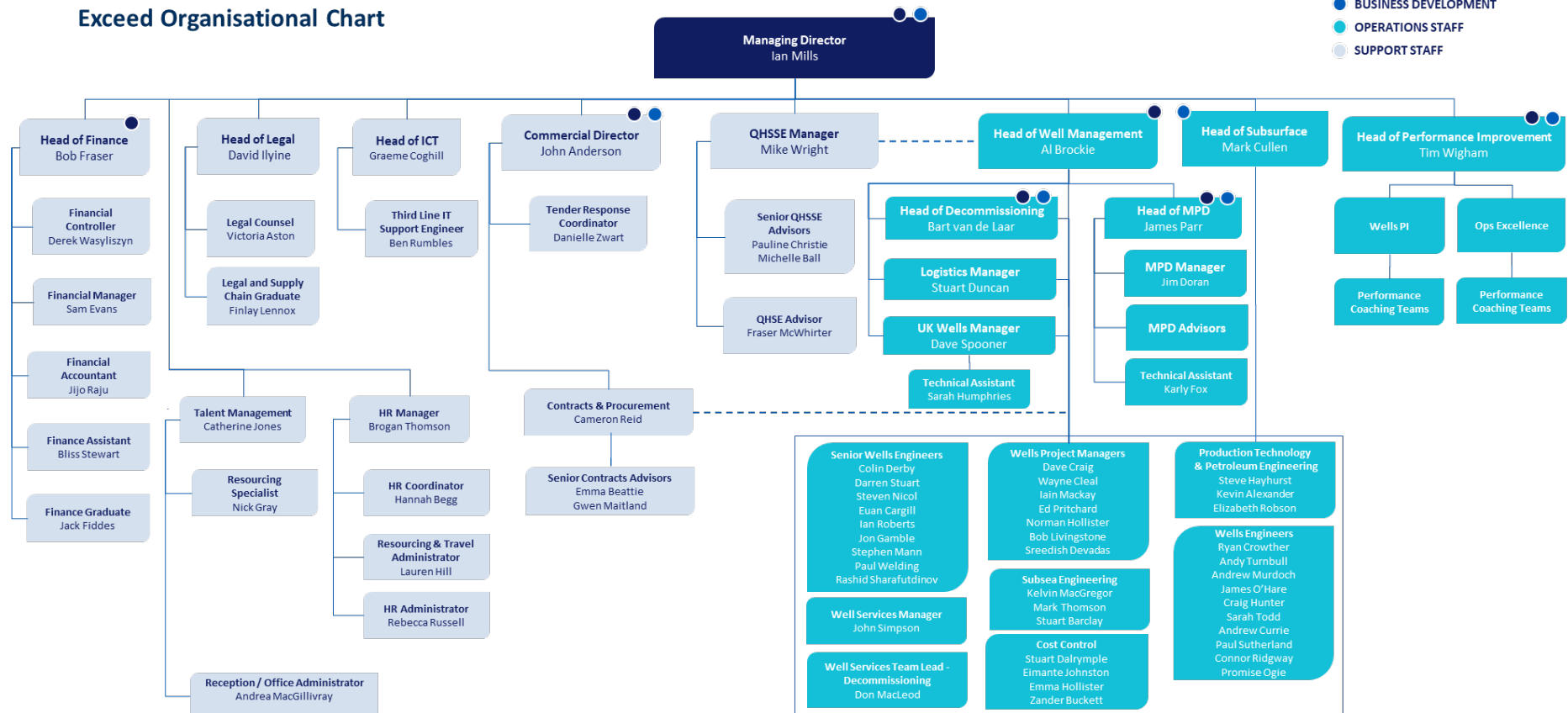


Figure 2.1 – Exceed Organisation Chart

2.2 Roles and Responsibilities

The Exceed Leadership Team demonstrate an active commitment to legal compliance, QHSE and the management of all HSE Hazards including Major Accident Hazards (MAHs). All personnel within Exceed have responsibility to adhere and commit to the policies and procedures put in place.

The key leadership roles within Exceed, Managers who hold specific responsibilities for QHSE and HSE management, as illustrated in Section 3.3, are summarised in the following text:

- **Managing Director**
 - Overall responsibility for implementing QHSE policies, setting Key Performance Indicators (KPIs) for QHSE performance and ensuring periodic review, as appropriate.
 - Ensure development and adherence to an internal and vendor audit schedule to ensure compliance with QHSE Management System.
 - Resolve conflicts between QHSE policies and other business needs.
- **Head of Well Management**
 - Responsibility for implementing QHSE policies, setting KPIs for QHSE performance and ensuring periodic review, as appropriate.
 - Provide oversight and support to all well management projects
 - Responsible for implementation of the Well Execution process.
 - Escalation points for the External Well Examiner, where resolution of an issue cannot be resolved at project level.
 - Specifically, within the Well Management Group.
 - Identifying personnel training requirements and competency gaps.
- **Head of Decommissioning**
 - Provide leadership of the Exceed Decom division
 - Manage and supervise the Exceed Decom engineering resources
 - Manage and supervise involvement (equipment & personnel) in Exceed Decom projects
 - Provide technical support to Exceed decom teams in the planning and execution of decommissioning programmes, applying company procedures, risk mitigation and problem solving as required
 - Provide technical and commercial support to the Exceed Head of Well Management, Commercial Director and operations teams in the development of project managed decom proposals
- **UK Wells Manager**
 - Provide leadership support to the Exceed Wells division
 - Focal point for all UKCS wells operations and when Exceed appointed Well Operator
 - Responsible for implementation of the Well Integrity process
 - Manage and supervise the Exceed UKCS well engineering resources

- Manage and supervise involvement (equipment & personnel) in Exceed UKCS wells projects
- Provide technical support to Exceed Wells teams in the planning and execution of well programmes
- Applying company procedures, risk mitigation and problem solving as required
- Provide technical and commercial support to the Exceed Head of Well Management, Commercial Director and operations teams in the development of project managed wells proposals
- **Wells Project Managers**
 - Responsibility for day-to-day implementation of QHSE policies, HSE Management System and HSE KPIs
 - Ensure Exceed operations do not endanger the H&S of any personnel or contractors.
 - Ensure Exceed activities do not cause environmental damage
 - Ensure personnel and contractors are competent for their role and are aware of individual responsibilities for relevant HSE legislation and the HSE Management System
 - Responsibility for procedures to allow identification of HSE hazards
 - Ensure risk assessments are undertaken, risks removed, mitigated and managed
 - Establish controls to allow an adequate and appropriate response to emergencies.
- **QHSE Manager**
 - Advice to management and personnel
 - Assistance on identifying personnel training requirements and competency gaps
 - Maintain contact with regulatory and external organisations on HSE topics
 - Technical assistance in relation to Oil Spill response strategies, when responding to an emergency event
 - Review and reassurance that Exceed's Management System is fit for purpose
- **Wells Technical Authority**
 - Is the focal point for all queries on well integrity database matters from both internal and external sources
 - Ensures appropriate and accurate paper and/or electronic records are kept of all activities carried out with respect to a well, which demonstrates compliance with The Offshore Installations and Wells (Design and Construction, etc.) Regulations 1996 (DCR), SCR 2015 and the Offshore Petroleum Licencing (Offshore Safety Directive) Regulations 2015 (OPL(OSD) 2015 Regs) and Exceed's policies and procedures. All such records shall form part of the Exceed Well File System
 - Accepts the Well Examination End of Operations Report and shall ensure that it is signed off
 - Accepts the Annual Integrity Report and shall ensure that it is signed off
 - Shall ensure that the WIM procedure is current to maintain well operational effectiveness and legislative compliance

- Shall monitor:
 - Progress against the WIM plan
 - Annulus pressures - compared with the MAASP values
 - Testing and inspection of safety and environmental critical elements (SECE) Well performance data
 - Well intervention and logging results
 - Lessons and non-conformances
- **Well Examiner**
 - For those occasions where Exceed is appointed Well Operator.
 - Tasks in accordance with the Well Examination Procedure (**EXCEED-PRO-WM-004**)
 - Responsible for undertaking independent review of safety and environmental critical elements (SECE) associated with the well's design, build and operation.

2.3 Leadership

Exceed recognise that visible Senior Management QHSE commitment and direct involvement are essential for successful QHSE performance and as such the Exceed Senior Management, endeavour to consistently demonstrate strong Leadership through:

- Leading by Example:
 - Promoting QHSE as a core Exceed value
 - Incorporating QHSE into performance reviews
 - Monitoring QHSE Performance
 - Setting QHSE goals and objectives
 - Actively engaging with Exceed personnel
 - Promoting a 'Just Culture' with personnel accountable for QHSE, without blame.
- Safety Culture:
 - Promoting a strong Exceed Safety Culture through all levels of the Exceed organisation
 - Open and honest lines of communication, 'open door' policy
 - Hold QHSE as the foundation of Exceeds culture
- Systems:
 - Direct involvement in the development and review of QHSE MS
 - Ensuring adequate resources are available to implement the QHSE MS and strive for continuous improvement of the system and QHSE performance
 - Supporting full accident/incident/near-miss investigations
 - Intervention when potential infringements of the CMAPP are identified
 - Ensuring QHSE MS is sufficient and effective
 - Ensuring the annual Management Reviews are comprehensive
- Workforce:
 - Promote active involvement of the Exceed personnel
 - Engage and support Exceed QHSE related committees and working groups
 - Communicating the findings from monitoring and review activities and ensuring appropriate remedial action is taken where necessary

- Promote Exceeds goals of continuous improvement

3 MANAGEMENT SYSTEM, POLICIES, PROCESSES & PROCEDURES

3.1 General

The QHSE management system is part of Exceed's fully integrated Management System, which comprises the policies, standards, procedures, processes and guidance documentation used to define how the business operates. The management system is structured to align and externally certified with international management system standards:

- ISO45001:2018 (Health and Safety Management Systems)
- ISO14001:2015 (Environmental Management Systems)
- ISO9001:2015 (Quality Management Systems)

3.2 Management System Structure

The Exceed management system is stored within the company Intranet, allowing immediate access to the most current and controlled documents for management of QHSE. Within the management system a documentation hierarchy, has been established as follows:

- Level 1 - QHSE Policy Statements & CMAPP
- Level 2 - Policy Arrangements Documents
- Level 3 – Procedures
- Level 4 – Guidance Documents
- Level 5 – Forms, Templates and Technical Guidelines

QHSE management and standards are fully integrated into the Exceed Well Delivery Process and as such is considered and given primacy throughout the planning and operational phases of the project.

The Exceed QHSE management system follows the Plan, Do, Check and Review cycle.

The HSE management system is described in the Exceed document, Arrangements – HSE Management (**EXCEED-PD-CP-002**) provides the assurance that the management of HSE matters are aligned consistently with the policies with appropriate targets set and measured. It also describes how Exceed meets the requirements of the stated 16 core elements of HSE Management. The Quality aspects of the management system are detailed separately within the Exceed Quality Manual (**EXCEED-PD-CP-001**).

Management System Overview

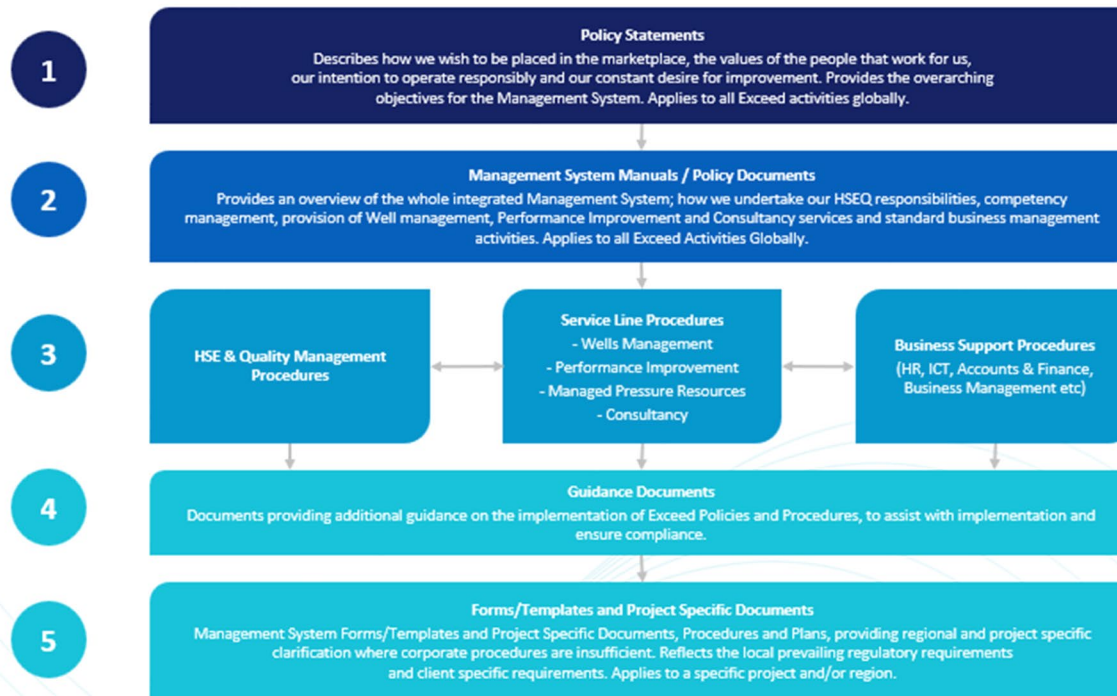


Figure 3.1 – Management System Structure

Wells Management System Overview

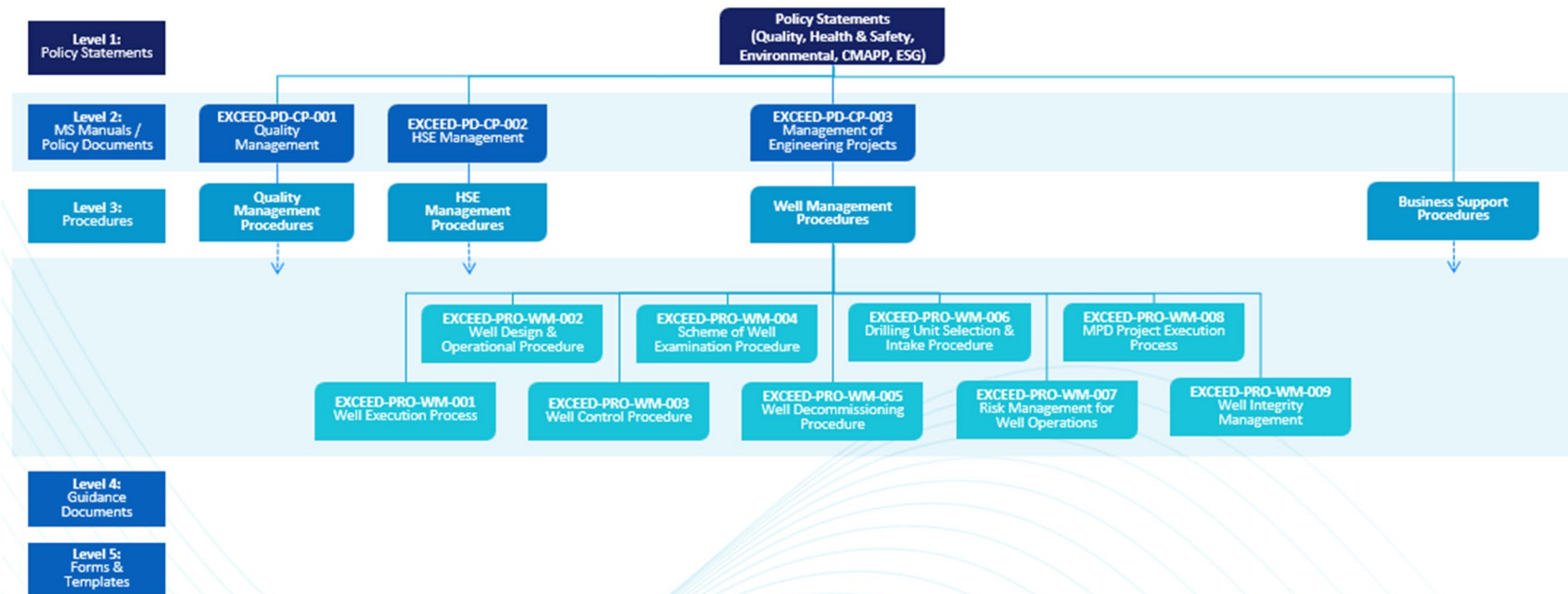


Figure 3.2 – Management System Overview – Well Management Procedures

3.2.1 Exceed's Core Elements of QHSE Management

The core elements of managing HSE are described below:

1. A strategic planning process should be in place for setting appropriate QHSE goals and objectives and establishing work plans to achieve them. Employees and contractors should be involved in the process and be provided with regular feedback. Goals and objectives should provide for creation of additional value and continuous improvement.
2. The QHSE Management System should provide for communicating the policies and demonstrating management's commitment to an QHSE culture that drives towards being Incident and Injury Free. Management will demonstrate strong, visible leadership and commitment in order to attain the required QHSE performance levels. Projects will create and sustain a culture that supports the QHSE MS based on the following:
 - o Belief in the company's desire to improve QHSE performance
 - o Motivation to improve personal QHSE performance
 - o Acceptance of individual responsibility and accountability for QHSE performance
 - o Involvement at all levels in the QHSE MS development
 - o Commitment to an effective HSE QMS by the principles set out below

To ensure a consistent level of Risk Assessment throughout the company, documented processes and procedures should be established, implemented and maintained to identify, assess and ultimately manage to a level that meets documented risk criteria associated with potential health, safety, and environmental impacts over which Exceed can be expected to have influence. The scope of risk assessment should consider all life-cycle business activities of Exceed activities which, in themselves, have an element of HSE risk. Risk assessments should consider normal, abnormal and emergency conditions. Risk assessment processes and procedures should be demonstrably applied and should recognize the necessity of applying, on a case-by-case basis, competent professional judgment on the appropriate level of risk assessment.

The results of the Major Accident Hazards (MAHs), hazards and environmental aspects and risk identification and assessment, including the preventative and reactive risk control and recovery measures, should be documented together with implementation action plans. A process should be in place to periodically review and, if necessary, update risk assessments.

3. There should be a process to identify, interpret, implement and document all regulatory requirements and standards of operations applicable to Exceed Operations, based on generally accepted industry/international codes of practice. Documented processes and procedures should be established, implemented and maintained to identify, assess and ultimately manage to a level that meets documented risk criteria associated with potential health, safety, and environmental impacts over which Exceed can be expected to have influence.

4. Roles, responsibilities and interrelations necessary to implement and maintain and facilitate the QHSE MS should be defined and documented and an effective means of communicating them should be in place. Adequate resources should be provided to achieve requirements and foster employee and contractor ownership at all levels. Roles and Responsibilities of Wells Project Managers should ensure that:
 - Their organisation and resources are adequate to achieve HSE objectives
 - Mandates and service agreements contain adequate provision for HSE
 - Their organisational structure is defined, documented and regularly reviewed
5. The Exceed Project QHSE Advisor will identify the need for, and ensure the development, review, approval, issuance, and updating of written HSE Plan, Programs, Standards, Procedures and management of the project's Permitting Licencing, Applications, Notifications and Consents (PLANC) register.
6. Asset and operations integrity issues relate primarily to Drilling Contractor and support contractors' equipment and procedures. As such Exceed QHSE Procedures in the form of Management System Standards and Bridging Documents will be created to support and interface with the Contractors Management System.
7. All employees, contractor personnel and visitors should attend an induction course and be made aware of their minimum QHSE responsibilities. Training and development plans should include induction, regulatory and technical skills training, as appropriate. Records should be kept of all training and the effectiveness of the training will be reviewed.
8. The Exceed QHSE Management System should include processes that address the reporting and investigation of non- conformances, near misses and incidents. Investigations should focus on determining root causes, with the objective of correcting deficiencies, preventing recurrence, and broadly sharing lessons learned.
9. Processes and procedures to facilitate effective internal and external communication of HSE issues should be developed. This should include awareness of the importance of compliance with relevant regulations and policies, achieving HSE objectives, and the consequences of deviating from them.
10. The Exceed QHSE MS documentation should describe the 16 core elements of QHSE Management and their links to other elements, documents, plans, processes, etc. This process or procedure should be in place to maintain QHSE related documents and records. The process should include a means to assure that documents can be identified, retained and are accessible. Documents should be periodically reviewed and revised as necessary and obsolete documents removed or retained for further use.

11. A process is in place to measure and monitor the significant QHSE aspects of Exceed's Projects. The process should assess the implementation and effectiveness of controls, track HSE performance and evaluate the achievement of stated goals and objectives, as well as provide the Project Management Team with the tools to understand trends, impacts and establish future direction.
12. The HSE Advisor advise the Legal Counsel on a QHSE section to be included in any contract. This HSE section will provide details of the standards required by Exceed as a condition of contract acceptance. The section will also provide details of the evidence needed to provide assurance that the Contractors HSE system is in place and is functional. At the contract tender review stage, the QHSE Advisor will assess the HSE section submission and report to the Project C&P Focal point on the suitability of the Contractor from an QHSE perspective. Throughout the duration of the contract, the Contractor will be held accountable to Exceed that the systems and standards submitted at the contract award stage are maintained or preferably improved upon.
13. A procedure should be established and developed for auditing compliance with the Exceed QHSE MS, legal requirements and standards being applied during the lifespan of the project. The audit programme will include all aspects of HSE requirements, i.e., contractors, subcontractors, Shore Base Workforce etc., that have potential HSE impact.
14. Exceed Project's should implement a process for the review of the Exceed QHSE MS status and performance and ensure timely action on QHSE issues. All reviews should be properly documented, including critical items, incident investigations/statistics, audit findings and best practices. The reviews should ensure the Exceed QHSE MS is kept "live" by assessing strengths and weaknesses and making appropriate changes in light of changing circumstances and the commitment to continuous improvement.
15. The QHSE MS should include a process for identifying and reviewing MAHs and potential emergency situations and the planning for mitigation and control of incidents. Contingency Plans and Emergency Response Procedures should be maintained which address potential emergency situations.
16. Exceed Project Teams create and sustain a culture that supports the QHSEMS based on the following:
 - Belief in the company's desire to improve HSE performance.
 - Motivation to improve personal HSE performance.
 - Acceptance of individual responsibility and accountability for HSE performance.
 - Involvement at all levels in the HSE Management System development.
 - Minimise, in a cost-effective manner, the hazards to personnel, environment, which could result from Exceed activities.

- Manage all the identified MAHs, hazards and impacts to the environment resulting from Exceed activities.
- Ensure a work environment that fosters prevention of incidents and delivers the goal of zero incidents and accidents and no harm to the environment.
- Minimise emissions and waste generation through careful planning and implementation of appropriate environmental management programmes.
- Maximise the efficiency of resources and energy usage through careful planning and execution of work.
- Ensure effective QHSE training and monitoring, especially for those most at risk.
- Implement a proper hazard identification and risk management approach to HSE, whereby all hazards are identified, controls are in place to manage them, and recovery mechanisms have proper resources.
- Foster open communication in all QHSE matters between Exceed, its contractors and the workforce.
- Ensure effective and frequent QHSE meetings.
- Provide a framework for providing incentives for the workforce for good QHSE performance and recognition for those who contribute most
- Ensure that appropriate tools, equipment, materials and PPE are always available and fit for purpose to ensure risk and harm to the environment is reduced.
- Ensure that Emergency Response Plans are properly implemented so that the consequences of any environmental incident are controlled and limited, for both major and less serious events.

3.3 Policies

Exceed is committed to operating in a way that prevents harm to people and to the natural environment. To this end quality, health, safety and environmental management measures have been put in place and are regularly monitored to:

- Ensure compliance with all relevant legislation.
- Sustain the major hazard prevention and mitigation arrangements in place in order to control the risks to people and the environment to acceptable levels
- Deliver high standards of Health, Safety and Environment performance consistently and seek to improve these at every opportunity

The Exceed Health & Safety Policy (**EXCEED-PS-CP-002**), Environmental Policy (**EXCEED-PS-CP-003**) and Corporate Major Accident Prevention Policy (CMAPP) (**EXCEED-PS-CP-004**) have been developed and endorsed by the Exceed Managing Director (MD). The Policies apply to all operations within the scope of the Exceed HSE Management System. Employees at all levels, and at all premises and operating locations throughout Exceed, should adhere to the requirements and intent of the Policies. The objectives of the Policies are considered to be of equal importance to all other objectives of Exceed.

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The Policies are made available to personnel and contractors by display throughout company offices and work sites. All newly hired personnel are given awareness of the Policies prior to the commencement of work. The Policies are available to the public on request. The content of the Policies are updated every 3 years as minimum, in accordance with the Exceed Document Control of Records procedure (**EXCEED-PRO-QA-001**) to ensure that they are still appropriate and effective.

3.3.1 QHSE Policies

The Health & Safety Policy (**EXCEED-PS-CP-002**) Figure 3.3, Environmental Policy (**EXCEED-PS-CP-003**) Figure 3.4 and Environmental, Social, Governance (ESG) Policy (**EXCEED-PS-CP-005**) Figure 3.5, recognise that the health and safety of employees and others affected by Exceed's operations, and the protection of the environment are an integral part of business performance and a prime responsibility of personnel at every level.

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DOCUMENT	HEALTH & SAFETY POLICY STATEMENT
DOCUMENT No.	EXCEED-PS-CP-002
REVISION	8
DATE	20.05.2025

1 HEALTH AND SAFETY POLICY

Exceed is committed to developing and maintaining a premier health and safety culture for all parties associated with the Company and its operations. The provision of a superior health and safety culture is a core company value of equal importance to environmental protection, operational efficiency, and profitability. **In case of conflict, safety will always come first.**

Application of the above will help us to achieve zero accidents and a healthy workforce, which will benefit ourselves, our clients, and the communities in which we work. No job is so important that we will take uncontrolled risks, and all accidents are considered unacceptable.

Exceed affirms its commitment to the following:

- An Injury Free Workplace will be achieved.
- Comply with all applicable laws, at home and in the countries where we operate.
- Management will be actively involved and commit sufficient financial and other resources necessary for quality health and safety performance. **Safety happens by choice, not by chance.**
- Line Manager/Supervisors will maintain the health and safety of all personnel as they direct work and other related activity. In the event of a real or apparent safety related conflict with operations, health and safety will always take priority. **Safety shall never be sacrificed for expediency.**
- Recognise society's concerns and work in partnership with local communities for mutual benefit.
- Systematically identify, assess, and control all possible safety and health risks in our work.
- All employees have a responsibility to eliminate at risk behaviour in themselves and others. This includes the obligation to "STOP THE JOB" during any perceived unsafe operation.
- Employees participate fully in all health and safety arrangements and all suggestions for improving standards of performance are actively encouraged
- Monitor H&S performance and strive for continuous improvement.

The Company will strive to ensure that:

- Health and Safety is promoted within, and external to, the organization.
- Safe systems of work are identified and adopted.
- Compliance with all applicable regulatory requirements is maintained.
- Appropriate levels of risk assessment will be applied to all activities.
- Employees are made aware of potential hazards and the necessary precautions to be taken through the communication of information, instruction, training, and supervision.
- The immediate and root cause of incidents (actual and potential) are identified and communicated to prevent reoccurrence.

This policy will be continuously reviewed and revised as necessary to ensure it remains effective.



20th May 2025
Ian Mills, Managing Director

Figure 3.3 – Exceed H&S Policy

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DOCUMENT	ENVIRONMENTAL POLICY STATEMENT
DOCUMENT No.	EXCEED-PS-CP-003
REVISION	5
DATE	20.05.2025

1 ENVIRONMENTAL POLICY

Exceed is committed to the preservation of the environment in which we operate and live. The Company intends to conduct all operations in a manner that will comply with both the letter and spirit of all applicable international and local environmental legislation, regulations and other requirements to which the Company subscribes. Exceed is further committed to a process of continual environmental performance improvement. The Company shall ensure that all personnel, including third party personnel working on or visiting Exceed Managed facilities, are informed of, and are required to comply with all Company environmental policies and procedures.

All personnel have an important role to play in achieving our environmental goals, from managers planning and supervising operations to personnel following the procedures put in place. Without exception, everyone is accountable for their actions.

To accomplish and maintain a level of environmental excellence the Company will:

- Assess the local environments in which we work.
- Assess our impact on those environments.
- Plan operations to minimise those impacts.
- Monitor our performance against those plans.
- Comply with applicable laws, regulations, and guidance.
- Seek the means for continuous improvement.

Our environmental effort will be based on the implementation of four key strategies at work locations:

- Minimization of waste by design and purchase.
- Managing waste output to follow best environmental practice.
- Guarding against accidental and operational pollution.
- Provision for mitigation of any accidental and operational pollution.



20th May 2025

Ian Mills, Managing Director

Figure 3.4 – Exceed Environmental Policy

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DOCUMENT No.	EXCEED-GD-HSE-005
REVISION	2
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DOCUMENT	ENVIRONMENTAL, SOCIAL, GOVERNANCE (ESG) POLICY
DOCUMENT No.	EXCEED-PS-CP-005
REVISION	1
DATE	21.03.2025

ENVIRONMENTAL, SOCIAL, GOVERNANCE (ESG) POLICY

The Exceed Group is engaged in the provision of Well and Decommissioning Project Management, Engineering and Performance Improvement services to the Energy Sector.

Environmental, Social and Governance (ESG) performance is a core company value that directly drives the businesses' success. As an organisation Exceed has always acted ethically and with integrity in its business activities. Our commitment to ESG excellence is built on these foundations"

Exceed uses the UN Sustainable Development Goals (UNSDGs) as the benchmark for our ESG strategy, aligning with those that are assessed to be material to Exceed's business and how we support our clients.

In addition, Exceed commits to meeting both Sustainability Accounting Standards Board (SASB) and Taskforce for Climate-related Financial Disclosures (TCFD) requirements for ESG transparency and reporting.

Through the implementation of our Management System, Exceed shall work to continually improving our own ESG performance and influence our supply chain and clients to strive for excellence.

Our range of services shall be tailored to customer requirements, building on regulatory and industry best practise and using Exceed's systems and processes to strive for ESG excellence for their projects, including reducing the CO₂ emissions of service delivery, combined with provisions for CO₂ offset.

Exceed recognises that the Energy Transition is the biggest ESG challenge facing our sector and is committed to a low carbon future with the aim to achieve net-zero CO₂ emissions by 2030.

We endeavour to be a proactive partner, leading by example and engaging with key organisations and stakeholders to contribute to the evolution of the Energy Sector by supporting the reduction of CO₂ emissions, through the Energy Transition journey.

The Exceed service offerings will evolve to meet societal energy demands yet be balanced to meet environmental standards to support our clients through their Energy Transition journey.



Ian Mills,
Managing Director
21st March 2025

Figure 3.5 – Exceed ESG Policy

3.3.2 Corporate Major Accident Prevention Policy (CMAPP)

Exceed has a Corporate Major Accident Prevention Policy (CMAPP) (**EXCEED-PS-CP-004**). The CMAPP recognises the importance of preventing and controlling major accident hazards. It reinforces Exceed's commitment to the safety of employees and to the minimisation of both the risk to the public and the impact on the environment of its activities.

The Exceed CMAPP provides demonstration from the Board of Exceed, as Duty Holder of wells, where Exceed is the Well Operator, of their commitment to major accident prevention.

The CMAPP has been reviewed by all members of the Board of Directors and is approved by and signed on their behalf by the MD.

The QHSE Management System provides a systematic approach for achieving the CMAPP commitments, for checking the outcomes, and for taking corrective and improvement action if the delivery is below expectation.

3.4 Well Execution Processes

The Project Well Execution Process (WEP) (**EXCEED-PRO-WM-001**) and the Well Decommissioning (Design & Execution) Process (DD&EP) (**EXCEED-PRO-WM-005**) detail how Exceed manages the design, construction, operation, workover and abandonment of all its operated wells. The WEP and DD&EP are key elements in meeting the Wells Function objectives in the areas of QHSE, reputation, asset longevity, subsurface objectives and operational performance.

The Wells Function is the custodian of the process but there are inputs, deliverables and feedback required across several Exceed Functions including Subsurface, HSE, Production, Operations, Logistics, Contracts and Procurement and Security.

The purpose of the WEP/DDEP is to:

1. Provide a consistent approach for the delivery of Wells projects across the company
2. Break down well delivery into key stages and identify responsibility / accountability for each stage and activity
3. Define the activities to be performed and the deliverables to be produced
4. Ensure hazards and risks are identified and managed
5. Ensure management of change is performed appropriately
6. Ensure well integrity is achieved and maintained
7. Ensure compliance with policy and standards
8. Ensure competency and resource levels are fit for purpose
9. Be scalable for the variety of projects performed by the Wells Function

WEP and DD&EP are a stage-gate process to plan, execute and operate an Exceed-operated well. The stage-gate process ensures the appropriate level of work is performed based on the available information and

current uncertainty of the project. The 5 stages of well delivery and the key deliverables are summarized below:

1. **Identify Stage:** Define the objectives and requirements of the well project and specify the key data to enable the well project to be designed
2. **Select Stage:** Review the conceptual design options and select the optimal in terms of risk, cost and well objectives. At the end of this phase the design will be frozen, enabling long lead items to be procured
3. **Define Stage:** Optimize the selected design and perform necessary preparation for operations and preparation of final cost estimate for use in the AFE
4. **Readiness Stage:** Optimise the design and perform necessary preparation for the Operate phase. The final time and cost estimate is produced during this phase for use in the AFE.
5. **Operate Stage:** Deliver the well as per programme to meet the well objectives and meet all the reporting requirements prior to closeout
6. **Close Out Stage:** Cessation of operations, deconstruction, demobilization of all services and equipment, completion of all end of well reporting and cost reconciliation

At the end of each stage and prior to proceeding to the next stage of the WEP/DD&EP, a stage gate review will be held. The project sponsor/client is responsible for giving financial approval to commit funds to proceed into the Select, Define, Readiness and Operate phases.

3.4.1 Identify Stage

Within the Identify Stage the objectives and requirements of the well project are defined, and key data is specified to enable the well project to be designed.

The objectives of this stage are:

- Outline the objectives and requirements of the project
- Perform initial technical feasibility, required resources and schedule of the project
- Identify key hazards and complexities of the project
- Establish the Project Risk Register/Assessment and associated Action Register, which will be carried through the project and reviewed and updated prior to each stage gate.
- Establish a clear decision point at the stage-gate whether to commit further resources and funding to the project for the Evaluate & Select phase of the project.

Project Screening is the high-level analysis often performed by the Client/ Project Sponsor. It is normally a precursor to the full well planning and may occur several years prior.

3.4.2 Select Stage

During the Select Stage the conceptual design process seeks to work up and screen various potential solution options on the basis of QHSE, technical, and commercial merit to establish a single conceptual design that delivers the well objectives. At the end of this stage the design will be frozen, enabling long lead items to be procured.

3.4.3 Define Stage

The purpose of the Define Stage is to optimise the selected design in preparation for the Readiness Stage. It is the Project Managers discretion when to hold the Peer Review and Stage Gate Review.

3.4.4 Readiness Stage

The purpose of this stage is to finalise the design and perform necessary preparation for the Operate stage. The final time and cost estimate is produced during this stage for use in the AFE.

3.4.5 Operate Stage

The Operate stage commences 1-2 weeks before the commencement of well operations. Final checks are performed prior to the rig intake and well construction activities commencing. The end of the Operate stage is when the well has been successfully abandoned, suspended or handed over to production and the rig is off contract.

All activities in the Operate phase are under Management of Change Procedure (**EXCEED-PRO-QA-014**). The Drilling Operations Program is the definitive execution plan. Deviations from the programme may become necessary due to uncertainties in the subsurface environment or problems encountered during operations. The change control procedures recognise the following levels of deviation from the approved work instructions:

- Minor Changes
- Major Changes
- Material Changes

3.4.6 Close Out Stage

During the Close Out Stage the Wells Project Manager shall initiate a review and close-out process, which shall be carried out when the well operations are complete to collate and record lessons learned and verify and ensure that all project objectives have been satisfied.

3.5 Independent Well Examination Scheme

The Exceed Well Examination Scheme is applicable 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 the Scheme of Well Examination Procedure (**EXCEED-PRO-WM-004**).

Exceed has appointed an independent Well Examiner to manage all aspects of the scheme. The UK Wells Manager ensures that the well examiner has the competence, qualifications and authority to carry out the functions under the well examination scheme effectively

The Well Examiner shall examine the well design to ensure that it complies with Exceed policies, standards and procedures and that it enables well integrity to be maintained during the construction and operational phases of the well. In performing this examination, the Well Examiner shall require access to various documents such as:

- Well proposal or Basis of Design
- Application to locate a MODU
- Rig move procedures, if applicable
- Installation Operations Safety Case(s)/ Combined Operations Safety Case(s), if applicable
- Shipping survey, if applicable
- Casing design document
- Details of offset data used
- Well Notifications/ Regulatory Submissions
- Material Changes to Well Notifications/ Regulatory Submissions
- Site survey and shallow hazard assessment
- Well programme and amendments, if applicable
- Minutes of any risk assessment, HAZID, or pre-operational meetings
- Expected well operating parameters
- Application to drill (PON 4/WONs Submission) or equivalent regulatory submission
- Application for workover/intervention (PON 8/WONs Submission) or equivalent regulatory submission
- Dispensations from policy
- Handover certificates
- Application to abandon/suspend (PON 5/WONs Submission) or equivalent regulatory submission
- During Operations:
 - Activity reports (e.g., Daily Drilling or Operational Reports, Casing and Cementing Reports, Perforating Reports, BOP Test Reports etc.)
 - Copies of completed handover certificates
 - Final well schematic
 - Final wellhead schematic, if applicable
 - Ordinance survey national grid reference, if applicable
 - Seabed/ site clearance certificate
 - OIR9B/ SCR 2015 Notification of Major Accident Reports (well integrity related only), if applicable

The Well Examiner is responsible for:

- Review of Well Notifications and preparation of Well Examiner Reports for UKCS operations prior to submission of the Well Notification to the Competent Authority or well operations taking place
- Review of Material Changes to Well Notifications and preparation of Well Examiner Reports for UKCS operations prior to submission of Material Changes to the competent Authority or proposed change to well operations taking place

- Review of regulatory well design submissions for overseas operations and further review of subsequent programme amendments or changes
- Continuing examination of the well pressure containing envelope of both subsea and platform wells in accordance with the Exceed Scheme of Well Examination. This will include all associated materials and equipment contained within and upon the wells
- Regular review of well activities to ensure that wells are designed, constructed, equipped, maintained and operated within their safe operating envelope
- Regular review of any well dispensations relating to well integrity permitting the continued operation of both platform and subsea wells

Examination activities will include:

- Reviewing wellhead, tree valve and SCSSV integrity test records to check that function and pressure tests are being performed to the appropriate policies and performance standards
- Ensuring that any follow up actions arising from failure to meet the performance standards are properly closed out
- Checking that regular ROV inspections are being performed as specified by the appropriate policies and performance standards
- Reviewing well related reports

Exceed shall provide the Well Examiner with an up-to-date listing and copies of the various policies, procedures, codes and standards that it has formally approved to control wells and well related activities. This listing defined in Appendix 3 shall form the document set that will be used as a basis for Well Examination. Exceed shall ensure that the Well Examiner is updated when there are changes made to this listing or any of the control documents referenced.

These policies, procedures, codes, and standards include but are not limited to:

- | | |
|---|--------------------|
| • Arrangements - HSE Management | EXCEED-PD-CP-002 |
| • Management of Engineering Projects | EXCEED-PD-CP-003 |
| • Well Execution Process Procedure | EXCEED-PRO-WM-001 |
| • Well Design & Operational Procedure | EXCEED-PRO-WM-002 |
| • Well Control Procedure | EXCEED-PRO-WM-003 |
| • Well Decommissioning (Design & Execution) Procedure | EXCEED-PRO-WM-005 |
| • Risk Management for Well Operations Procedure | EXCEED-PRO-WM-007 |
| • Well Integrity Management Procedure | EXCEED-PRO-WM-009 |
| • Management of Change Procedure | EXCEED-PRO-QA-014 |
| • Management of Safety Critical Elements | EXCEED-PRO-HSE-013 |
| • API, NACE, Oil and Gas UK, IP, and other Industry Codes of Practice and Standards | |

The various policies, procedures, codes, and standards that Exceed has formally approved shall be applied to all stages of well design, construction, operation, and maintenance activities. If, at any time, this is not possible then a properly authorised dispensation shall be issued and copied to the Well Examiner.

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The Independent Well Examiner should examine the well design to ensure that it complies with the Exceed policies, standards and procedures and that it enables well integrity to be maintained during the construction and operational phases of the well.

Any problems, programme changes or differences between planned and actual operations, or changes in well status which may impact on well integrity, shall be highlighted to the Well Examiner by the relevant personnel in the Well Operations and Projects Teams either via the Daily Drilling or Operational Reports or by agreed channels of communication. If the well operations during any phase of the well life cycle have to be amended for any reason it shall be done using the Exceed approved Management of Change (MoC) procedure (**EXCEED-PRO-QA-014**) which defines levels of change as Minor, Material and Major. The Well Examiner shall be consulted as is specified in the Exceed MOC procedure – typically in the event of a Material of Major change.

If the Well Examiner has any queries or concerns regarding the design of a well that are not answered in a timely manner to his/her satisfaction by verbal or e-mail communication, then a formal Comment Sheet shall be issued to the appropriate Engineer responsible for the design.

When a formal Comment Sheet is issued a copy shall be sent to the Engineer responsible for the well operation ensuring that this is communicated to the Head of Well Management whose responsibility it will be to ensure that a timely response is given.

The Engineer issued with the formal Comment Sheet shall respond to the concerns raised by completing the relevant section of the form and returning it to the Well Examiner within 5 working days.

The Well Examiner shall maintain a register of all e-mail correspondence exchanged and any formal Comment Sheets issued and closed out.

Once construction operations, including drilling, testing, completing, workover, abandonment and suspension have been concluded, and the well is handed over to the License Holder Exceed have fulfilled their role as appointed Well Operator for the design and construction phases of the well. Responsibility for any further well operations associated with subsequent activities in the wells lifecycle, including Well Examination of operational phases, become the responsibility of the License Holder, unless Exceed have appointed a Well Operator for these activities.

Examination of such wells shall entail initial examination by the appointed Well Examiner of the well's operating and maintenance procedures, and regular monitoring of data provided in operational reports (e.g., annulus pressures, DHSV and Tree valve testing records, maintenance records etc.).

Should Exceed be appointed as long term Well Operator the integrity of each Exceed well should be recorded in a well integrity summary within Exceeds chosen integrity monitoring system. This shall provide a summary of the wells condition and operating envelope. Wells should be categorised to clearly identify the severity of the well integrity issue associated with the well envelope.

The Exceed Well Examination Scheme is subject to periodic reviews and audit as required to ensure suitability.

3.6 Risk Management

Exceed demonstrates a corporate commitment to the management of Major Accident Hazards (MAH) and takes appropriate measures to ensure as far as is reasonably practical that there are no unplanned escapes of hazardous substances resulting in a Major Environmental Incident (MEI), as a direct result of an MAH being realised. In line with the Corporate Major Accident Prevention Policy (CMAPP) (**EXCEED- PS-CP-004**) and in conjunction with the client, Exceed ensures that no single failure of a containment barrier can lead to a Major Accident (MA).

This is accomplished by:

- Identifying MAHs
- Assessing MAH Risks
- Establishing suitable control measures to eliminate or reduce MAHs to ALARP (As low and reasonably practicable).

The Risk Management for Well Operations Procedure (**EXCEED-PRO-WM-007**) and the Risk Assessment Procedure (**EXCEED-PRO-HSE-004**) ensures a consistent level of Risk Identification and Assessment is carried throughout the company.

The Risk Management is integrated with the WEP/DDEP, with Risk Management deliverables and activities linked to specific stages, and a requirement to allow passage through the stage gate.

In summary:

- **IDENTIFY Stage Risk Management Activities**
 - A project specific HSE Plan shall be prepared for the project, including HSE KPIs
 - An IDENTIFY HAZID/ENVID – ‘What if’ Analysis shall be carried out, the results of which shall be risk assessed and incorporated into the initial Project Risk Register
 - A gap analysis shall be carried out by Exceed of the Client’s Management Systems, with any gaps addressed and allocation of Management System Primacy detailed within the Contract Management Plan
 - Relevant local and international legislation and standards associated with the project shall be reviewed either in the form of a desktop review or through face-to-face meeting with relevant regulators
 - A Permits, Licences, Authorisations, Notifications and Consents (PLANC) Register shall be prepared to track status and close out of all requirements.
 - For international operations, a country assessment shall be performed, in accordance with the Exceed Security, Travel and Journey Management Procedure (**EXCEED-PRO-HSE-003**)

- **SELECT Stage Risk Management Activities**
 - SELECT Phase HAZID/ENVID workshop shall be conducted to identify all new hazards identified during the SELECT phase
 - A Subsurface Risk Assessment shall be carried out
 - Suitability of MODUs shall be assessed in accordance with the Exceed Drilling Unit/Vessel Selection and Intake Procedure (**EXCEED-PRO-WM-006**)

- **DEFINE Stage Risk Management Activities**
 - A full DEFINE Phase HAZID / ENVID workshop shall be conducted to identify all hazards of the well operation including causes and consequences. This workshop shall include the client, drilling contractor and key safety critical service providers.
 - A Major Accident Hazard (MAH) risk assessment shall be conducted
 - A Basis of Design risk assessment shall be conducted
 - A Relief Well Complexity Assessment shall be completed (**EXCEED-FT-WM-DR-014**)
 - Where required, a HAZOP workshop shall be conducted
 - Where required, a SIMOPS / COMOPS review shall be conducted
 - For remote locations, a Supply Base Safe System of Work (SSOW) shall be prepared in case a project specific / exclusive supply base is required for the project
 - The selected MODU Safety Case shall be reviewed, including, but not limited to:
 - EER and TR Analysis
 - Consequence Modelling
 - Quantitative Risk Assessment
 - Safety Critical Task Analysis
 - Human Factors in Design
 - Human Reliability Assessment
 - Any perceived gaps shall be identified, and actions agreed with the Drilling Contractor to close the gaps.
 - A review of the Drilling Contractor Safety Management System (SMS) shall be performed by the HSE Advisor, combined with the gap analysis completed during the IDENTIFY phase, and used as reference for bridging documents.
 - A project specific Security Plan shall be prepared if warranted from the findings of the country assessment completed in the IDENTIFY phase.
 - The rig audit and inspection shall be performed as per the Drilling Unit/Vessel Selection and Intake Procedure (**EXCEED-PRO-WM-006**).
 - HSE and competency audits shall be carried out on 3rd party service companies deemed to be safety critical, in accordance with the Exceed Audit, Non-conformance, Corrective and Preventative Action Procedure (**EXCEED-PRO-QA-002**).

- **READINESS Stage Risk Management Activities**
 - A project specific Management System Interface Document (MSID) or COMOPS Bridging Document shall be prepared and written in line with Step Change in Safety, Health and Safety Management Systems Interfacing Guidance

- A project specific Emergency Response Plan (ERP) shall be prepared to ensure interfaces, roles and procedures are clearly defined
 - A Well Operational Phase Risk Assessment shall be carried out
 - A project specific Oil Spill Contingency Plan/TOOPEP shall be prepared
 - A desk-based ER exercise shall be carried out
 - Other specialist plans e.g., H₂S contingency plan, shall be prepared with inputs from 3rd party specialist if required.
- **OPERATE Stage Risk Management Activities**
 - Regulatory commitment register shall be reviewed, actioned and updated throughout operations
 - Regulatory reporting requirements shall be fulfilled
 - QHSE audits and inspections shall be conducted on all project locations to ensure compliance with HSE plan and approved bridging documentation
 - HSE performance, including MAH, leading and lagging indicators shall be tracked and actioned as appropriate
 - An ER communications check exercise shall be carried out
 - A full ER simulation exercise (oil spill) shall be carried out
 - **CLOSE-OUT Stage Risk Management Activities**
 - All post operational regulatory notifications shall be submitted as soon as operations are completed
 - Post operations, a HSSE End of Well Report (EOWR) shall be prepared
 - ESIA/Permitting Compliance Report shall be prepared
 - PLANC register shall be reviewed and closed out
 - All lessons learned captured in the Lessons Learned Register (**EXCEED-FT-WM-WEP-017**) shall be reviewed and incorporated into the Exceed Master Lesson Learned Database

3.6.1 Hazard Identification and Assessment Process

3.6.1.1 Hazard Identification

The specific technique adopted for MAH identification varies depending on where in the lifecycle of project that the identification of hazards is taking place. Measures for prevention, control and mitigation will be identified, assessed and applied to ensure that risks are ALARP. Examples of techniques utilised are HAZID (Hazard Identification), Environmental Impact Identification (ENVID) and Hazard and Operability (HAZOP) studies.

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) should consider all phases of the well operation including rig moves, drilling, well testing, completion, 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 include the Exceed Project Team, Project Manager and key service contractor personnel. A HAZID report is produced, and the actions tracked to completion. A record of the meeting should be retained in the well file that shows:

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

The Exceed Risk Management for Well Operations Procedure (**EXCEED-PRO-WM-007**) provides further guidance on the identification of hazards during well planning.

3.6.1.2 Risk Assessment

For each project various Risk / Environmental Impact Assessments are conducted at different stages, in accordance with the Exceed Risk management for Well Operations Procedure (**EXCEED-PRO-WM-007**), utilising the output of the HAZID/ENVID process, in accordance with the Exceed Risk Assessment Procedure (**EXCEED-PRO- HSE-004**).

The risk assessment process will:

- Identify and record all threats associated with the operation being assessed.
- Score the probability rating and severity rating each threat identified from the HAZID or otherwise.
- Determine control measures for each hazard and record these on the Risk Assessment Form. Control measures should be established following the hierarchy of control i.e.:
- Elimination
 - Substitution
 - Engineering controls
 - Procedural controls
 - Reduction in personnel/time exposure
 - Personal protective equipment (PPE).
- Determine the Residual Risk once the control measures have been established for each hazard.
- Record actions required to strengthen any identified Control Measure.
- Decide whether risk would be carried over on to the project risk register.

The results of the risk identification and assessment, including the preventative and reactive risk control and recovery measures, should be documented together with implementation action plans.

When operations commence, the Wells Project Manager and Senior Well Site Lead should use the HAZID and documented Wells Operational Risk Assessment (WORA) 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 will provide feedback to the Well Project Manager if additional risks or control measures are identified in which case the Risk Assessment should be revised and re-issued.

During operations, Exceed rig site personnel should support the Drilling Contractor's/Platforms Permit to Work System which should include requirements for Task-Based Risk Assessment to be carried out and by attending pre-job meetings and by checking that all personnel on the rig are aware of task hazards and control measures.

3.6.1.3 Occupational Risk

Where the HAZID/ENVID and Risk Assessment process indicates that employees may be exposed to substances or conditions (i.e., H₂S, radioactive substances, chemicals etc.) which may affect their health in the short to long term, processes and procedures will be implemented to minimise exposure to ALARP. Specialist contractors will be brought in as and when required to manage certain hazardous processes and to provide appropriate training and monitoring services.

Pre-employment medicals, offshore medicals and overseas assignment medicals should be used by Exceed to monitor any potential occupational health issues suffered by employees and Exceed may carry out additional health surveillance where required.

Exceed ensure that employees are provided with sufficient and appropriate Personal Protective Equipment (PPE) in line with the requirements of the Exceed Personal Protective Equipment Procedure (**EXCEED-PRO-HSE-008**) to carry out their duties in a safe manner. Provision of PPE also includes prescription eye protection where required.

The Exceed Alcohol and Drugs Policy (**EXCEED-PD-CD-016**) describes the company's position on alcohol and substance abuse. The policy applies to any individual who is an employee of the company, and any other worker who is providing a service to the company, whether they are at a Client's work location, or at the company's offices, or work sites and applies also to all visitors to any offices, or work sites owned or let under contract to the company.

3.6.1.4 Environmental Risk

Exceed have an independently verifiable Environmental Management System (EMS) in place. The EMS satisfies the requirements of the International Standard ISO 14001, which is considered to meet the requirements of the BEIS Environmental Management System (EMS) Guidance and secure compliance with the OSPAR recommendation 2003/5. As part of the Exceed Environmental Management System environmental aspects associated with the activities, products and services carried out by Exceed are identified and assessed to determine which of those aspects have or can have a significant impact on the environment.

The process used to identify and evaluate the environmental aspects associated with well design, engineering, project management, well integrity and operations supervision services under the management of Exceed are described in the Exceed Identification of Environmental Aspects and Impacts

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Procedure (**EXCEED-PRO-HSE-002**). The process used by Exceed to identify aspects and screen associated potential impacts for significance is shown in Figure 7 below.

The results of these assessments are contained within the Exceed Environmental Aspects Register (**EXCEED-FT-HSE-006**). This template is used as a starting point for the generation of a project specific Aspects register. In preparation of the project specific Aspects Register, the relevance of each aspect is considered together with the project specific risk level. The standard controls stated within the register are the minimum level which needs to be applied. It is the responsibility of the Wells Project Manager and Senior Well Site Leader not only to ensure the delivery of the controls described, but also to add and ensure the delivery of augmented controls where deemed necessary.

In addition to the Well Operations aspects and impacts, those associated with the offices and the building are included within the Exceed Environmental Aspects Register Reference (**EXCEED-FT-HSE-006**).

To ensure the generic register content remains current it is reviewed as part of the annual management review. This register is maintained by the QHSSE Manager.

3.6.1.5 *SIMOPS/COMOPS*

In the event of a project involving SIMOPS/COMOPS a workshop will be held; the purpose of this activity is to identify all activities that have the potential to impact other operations being carried out. The output of this workshop is generally a SIMOPS Matrix, listing all key activities and whether they can go ahead simultaneously without any additional controls (green), cannot occur simultaneously (red) or can proceed simultaneously but with additional controls (amber). Note, those marked amber should have the explicit control defined.

If required, during the DEFINE Stage the SIMOPS Matrix shall be included within the project's MSID / COMOPS Bridging Document.

3.6.1.6 *Safety and Environmental Management System (SEMS) Interface*

The standards of health and safety by any one party (duty holder or well operator) involved in a well operation shall not be compromised by other parties. It is therefore necessary to review interfacing and integration arrangements of the SEMS from each party. Should Exceed be required to use any element of another party's SEMS, it shall be confirmed that the standard of safety has not been compromised and that, if required, remedial steps are documented. Such steps include, but should not be limited to, counter signatures at key stages, duplication of risk assessments or development of a new integrated process. SEMS interface will be carried out in line with Step Change in Safety H&S Management Interfacing Guidance.

Bridging arrangements shall be documented within the Project Management System Interface Document (MSID) or COMOPS Bridging Document, as appropriate. The completed SEMS Review Checklist shall be included as an Appendix in these documents.

3.7 Management of Change

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 and or new environmental impacts.

Exceed follows a systematic Management of Change Procedure (**EXCEED-QA-PRO-014**) to ensure that variations are fully discussed, analysed and assessed for health, safety or environmental risks, prior to implementation. The underlying principle of this procedure is to ensure that all changes are assessed and documented in a consistent manner so that:

- Unnecessary or counterproductive changes are prevented
- Changes do not lead to the compromising of safety, loss of production or service, or cause injury to personnel or damage to the environment
- An auditable record of the assessment rationale and change assessment process is produced
- Appropriate Risk Assessments are carried out prior to the change
- Interfaces with all disciplines are taken into account before committing to the change.
- The originator, or department requiring the change, is responsible for initiating the change process.

3.7.1 Policy Dispensation

Exceed Policy may only be changed or deviated from with the approval of the relevant Head of Division or delegate, for example, Head of Well Management or UK Wells Manager.

Dispensation should be sought by documenting the reasons why the dispensation is required and what implications deviation from the procedure may have to operations.

For example, a dispensation may be requested for a single well or a number of wells in the same field. It must not be assumed to apply to other situations unless a similar specific dispensation has been sought and approved.

The format for procedure dispensation must therefore include the following items:

- Which policy/standard/procedure is to be deviated from?
- The reason for the request
- The proposed departure from procedure
- The additional risks which may be incurred
- The actions to be taken to minimise those risks
- The duration of the dispensation
- Does the dispensation require consultation with the Well Examiner or relevant regulatory authorities?
- The dispensation must be signed by the following:
 - Originator

- Reviewer
- Approver

An appropriate risk assessment must be carried out prior to granting policy relaxation or change from approved procedure. This should be carried out in accordance with the Exceed Risk Assessment Procedure (**EXCEED-PRO-HSE-004**) and attached as supporting documentation if required.

A signed copy of the MoC form must be retained in the relevant well file and referred to or copied into the Programme.

3.7.2 Operational Programmes and Work Instructions

All well operations are carried out in accordance with the work instructions contained in the approved Programmes and subsequent Programme Amendments.

These procedures should also apply to deviations from Drilling/Well Testing/Completion/Decommissioning / Intervention / Workover Programmes, with the relevant Exceed Engineer assuming the responsibilities of the Project Engineer.

Deviations from the programme may become necessary due to uncertainties in the subsurface environment or opportunities / issues encountered during the course of operations.

A Project MOC Decision Matrix (**EXCEED-FT-WM-WEP-023**) will be prepared for each project, with change control procedures recognising the following levels of deviation from the approved work instructions.

3.7.2.1 Minor Changes

A Minor Change to the operations programme will be discussed and agreed at the Morning Operations Meeting or equivalent. Programme changes will be confirmed by e-mail from the Wells Project Manager, or designate, to the Senior Wellsite Leader.

- A “minor change” is a change to an approved work programme (or a procedure referenced in it) that has no safety implication and has no impact on the operation’s objectives. Examples include but are not limited to
 - **Drilling:** an additional wiper trip.
 - **Well Test:** Additional sampling requirements
 - **Completions:** Additional Wellbore clean up run
 - **Well Integrity:** Additional routine maintenance on plant or equipment not impacting the barrier elements of the well.
 - **Decommissioning:** Additional casing cleanout run prior to logging

Minor changes for well operations do not require a formal MoC form to be completed. However minor, non-operational business changes may require a form to be completed.

In all instances, an MoC record must be created in the register and the relevant email, form or supporting documentation must be attached uploaded the MoC record in the system.

3.7.2.2 Major Changes

A change that changes the fundamental methodology of a planned operation and/or increases expected well time or cost by 3-10%. This could be in the form of, for example, additional steps added to the work scope to overcome a problem or change of sequencing of the planned operations. Any such change requires a programme amendment to be issued, supported by an MoC form with accompanying risk assessment (as per the RA procedure). Such changes shall be notified to the Well Examiner and the Programme Amendment, MOC Form and RA provided. (This is because the Well Examiner has examined a Programme of work, and therefore if the programme changes, they should be aware of those changes).

The Wells Project Manager shall discuss the proposed change with the Client Representative and if required, Exceed UK Wells Manager and/or Head of Wells. Programme Amendments are approved by the Wells Project Manager and Project Engineer, or their delegates, and form part of the Drilling / Well Test / Completion / Decom Programme on issue.

- A “Major Change” is defined as a change to an approved work programme that does not impact the operation’s objectives but could have a direct safety implication and/or major cost implication. Examples include, but are not limited to:
 - **Drilling:** Casing shoe leak-off test or formation integrity test below expected value or the failure of and/or replacement of a wellbore barrier to flow.
 - **Well Test:** Well barrier element failure i.e. Well Test packer fails pressure test. Test string requires recovery and re-run
 - **Completions:** Changes to completion architecture out with the agreed programme i.e. electing not to run a gauge.
 - **Well Integrity:** Any failure impacting on a safety function resulting in the spurious operation of the safety element putting the well the under protection, into a safe state or maintain a safe state
 - **Decommissioning:** Failure of a planned barrier

For all matters of Health & Safety, the Well Examiner and the Regulatory Authority (OMAR / HSE, UKCS only) shall be directly involved in major changes, in order to examine and inspect respectively.

Changes affecting the Final Well Status are automatically a Material Change and must be treated as such

3.7.2.3 Material Change

A Material Change is one which changes the final well status, and/or the well envelope (pressure tests, materials used, casing setting depths, etc). A Material Change shall be presented to the Well Examiner for examination, and subsequently issued to OMAR (HSE/OPRED) for consent (UKCS only). A Material Change is not triggered by cost or time, but by safety and environmental considerations associated with well construction and life cycle operations. The MoC should though include all consequences of the Change as should the associated Risk Assessment.

The Wells Project Manager shall discuss the proposed change with the Client Representative, Drilling Contractor Representative, Exceed UK Wells Manager and/or Head of Wells, Well Examiner, OMAR (HSE/OPRED) and other relevant regulators as required.

This, in addition to Wells Project Manager and relevant Project Engineer approval, shall be approved by the Well Examiner, Customer Representative and the Drilling Contractor's Representative, or their delegates. The change can only be enacted once OMAR consent/non objection has been received, where appropriate.

Confirmation of approval of a change from any of the above specified signatories is acceptable by electronic mail from the signatory's account. In the event of electronic mail approval from the Customer Representative, the MoC should be marked "Written Approval Received" against the Customer Representative's name and initialled by the Project Engineer or Wells Project Manager, or their delegates. This approval shall be saved alongside the other documentation related to the MoC in the system.

- A change affecting the final well status is defined as a material deviation from plan which results in the objectives or the design of the well changing. Examples include, but are not limited to:
 - **Drilling:** Deletion of a planned casing point, change in pore pressure affecting planned well design, deepening of well beyond planned TVD or original PBTD, revised casing setting point within the reservoir resulting in loss of reservoir section or plug back of existing wellbore and subsequent sidetrack.
 - **Well Test:** Flow of hydrocarbons into the annulus during the well test flow periods or events that would require the well to be killed prematurely.
 - **Completions:** Any action i.e., hydrates, that would prevent a safety element from operating when required (demand mode) or causes a safety function to fail such that the well under protection is put into a hazardous or potentially hazardous state
 - **Well Integrity:** Any event or action that reduces the probability that a safety function operates correctly when required.
 - **Decommissioning:** Unable to access a planned plug setting interval due to a restriction in the wellbore

3.8 Management of Safety and Environmental Critical Elements (SECE)

In the UK, when a Licensee 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 Well Integrity Management Procedure (**EXCEED-PRO-WM-009**) defines the requirements for Exceed, acting as Well Operator, to ensure Safety and Environmental Critical Elements (SECE) are identified and managed in compliance with SCR 2015. The Exceed Management of Safety Critical Elements Procedure (**EXCEED-PRO-HSE-013**) outlines the way in which SECE's are identified and maintained.

A SECE is any structure, plant, equipment, system, or component part that:

- The failure of which could cause or contribute substantially to a major accident.

- A purpose of which is to prevent, or limit the effect of, a major accident.

In this context major Accident is defined as:

- A fire, explosion or other release of a dangerous substance involving death or serious personal injury to persons on the installation or engaged in any activity on or in connection with it.
- Any event involving major damage to the structure of the installation or plant affixed thereto or any loss in stability of the installation.
- Any event leading to significant environmental impact.

The SECEs applicable to well operations should be determined by a SECE identification process. The identification of SECEs is governed by the following steps:

- Identify Major Hazard Scenarios, i.e., The major hazard identified for the wells is an uncontrolled escape of reservoir fluids to the environment which leads to potentially significant environmental impact.
- Identify potential causes of the major hazards, e.g., loss of containment due to equipment failure.
- Identify the prevention, detection, control, and mitigation measures in place to stop potential hazards escalating into events.

A register of SECEs is maintained by Exceed for each operation. The individual SECEs are reviewed to establish the requirements for examination and testing in relation to appropriate performance standards. Details of the SECE inspection, integrity testing and maintenance can be found in the Exceed Well Integrity Management Procedure (Exceed-PRO-WM-009). A Well Examination Scheme is operated by Exceed for systems that have been identified as safety critical. Details of the Well Examination Scheme can be found in the Exceed Scheme of Well Examination procedure (EXCEED-PRO-WM-004).

3.8.1 Safety And Environmental Critical Equipment Related to Well Operations

After the drilling unit/vessel has been contracted, the rig owner, who will likely be the Installation Duty Holder, may require certain information from Exceed to satisfy their own Installation Verification Scheme.

In particular and upon request, the rig owner needs to be given details of all Exceed third party equipment to be placed on or attached to the installation to determine which items are safety and/or environmentally critical. If it is, this equipment needs to be supplied with evidence that it has independent verification, by a competent person, acceptable to the drilling unit owner's independent verifier. The installation owner can reject the equipment if it is deemed safety and/or environmentally critical and there is not verification scheme in place.

3.8.2 Roles and Responsibilities

The responsibility for compliance with SCR2015 requirements relating to the drilling unit lies with the installation owner (Duty Holder), the Exceed Wells Project Manager will request appropriate information from the Installation owner confirming compliance with the SCR 2015. This may include confirmation of:

- The status of the installation's safety case, including any revisions
- The maintenance status of the well control equipment
- The status of the installation's verification scheme, including confirmation that all SECEs concerned with well operations have been identified and examined by independent and competent persons
- Competency evidence of personnel for well operations.

In addition, the following activities will be carried out:

- Prior to the start-up of any new rig contract Exceed will conduct rig inspections/contractor audits to ensure the integrity of SECEs is as required.
- Review the installation verification scheme
- Audit installation Safety & Environmental Management System (SEMS) to check maintenance and personnel competency standards for well operations.

The Exceed Supply Chain Manager will ensure that there is an agreement, at a contractual level, that Exceed contractors will supply appropriate information to concerning compliance with "Provision and Use of Work Equipment Regulations" (PUWER). The Project Drilling/ Subsea/ Completions Engineer may, at their discretion, request confirmation of:

- The design and maintenance status of the well equipment and any other "Safety and / or Environmental Critical Equipment"
- Personnel competency evidence for well operations
- Any Safety and /or Environmental Critical Equipment independent competent verification evidence.

For Exceed well tangibles the design criteria must be consistent with the approved well design in terms of pressure rating, metallurgy and mechanical properties. Certification and records will be retained to demonstrate that:

- a) The design envelope is consistent with the well design
- b) Appropriate specifications and standards have been used
- c) (Preferably independent 3rd party) Certification is available to demonstrate compliance with a) and b).

3.9 Communication and Engagement

Exceed's CMAPP and QHSE Policies are widely communicated to the workforce. Copies of the policy statements are made available to all employees either electronically or via hard copy posted at the worksite. All new employees are made aware of the policy statements and of the requirements of the management systems during the induction process. All management system documentation is made available to Exceed personnel electronically and all personnel should be aware of their responsibilities regarding QHSE management.

Exceed employees are kept informed of pertinent HSE information by means of effective internal communications. HSE alerts, bulletins, lessons learned, and updates are issued as matters arise and

distributed as appropriate to relevant personnel. HSE matters are communicated to individuals as per the requirements of the Exceed Communication Procedure (**EXCEED-PRO-QA-005**).

Formal communications with regulatory bodies (Health and Safety Executive (HSE), Department for Business, Energy & Industrial Strategy (BEIS), SEPA (Scottish Environmental Protection Agency), EA (Environmental Agency) are managed in accordance with the Exceed UK Regulatory Engagement Procedure (**EXCEED-PRO-HSE-015**), by the QHSSE Manager as are any issues of complaint received by Exceed.

3.9.1 QHSE Meetings

Monthly QHSE meeting are held onshore and are open to all employees to attend and to contribute to. It is at these monthly HSEQ meetings where staff are encouraged to provide feedback and suggestions for the continual improvement of the HSE management system and performance.

When offshore projects are initiated a number of planning meeting (HAZIDS, Risk Assessments, ENVIDS, DWOP, CWOP, Pre-spud etc.) are run onshore and these will include the communication of relevant HSE issues as part of their agendas. These planning meetings may be attended by the extended Exceed team i.e., clients, contractors and subcontractors, as required, and will be used to communicate HSE requirements to the wider audience. Pre-spud meetings will also be run offshore prior to operations commencing and will be used to communicate Exceed's QHSE requirements and management engagement to the rig team.

Once offshore operations commence, a number of forums will be used to discuss Exceed HSE requirements and to discuss HSE performance alongside operational issues, these will include but not be limited to:

- Morning Rig / Operations Call
- Offshore Pre-Tour and Safety Meetings
- HSE focused conference calls
- Supervisors' meetings
- Rig induction

3.9.2 Tripartite Consultation

Exceed subscribes to membership of industry bodies such as Offshore Energies UK (OEUK) and the International Association of Drilling Contractors (IADC), ICoTA and support these bodies via participation in various work groups, committees, consultation processes and attendance at industry conferences run by these bodies. Where required any changes to the operations, policies or procedures of Exceed resulting from participating/contributing to these industry bodies will be discussed with senior management and operational personnel as required. Where changes have been implemented these will be communicated to the affected audience and monitored via the internal audit process as required.

Exceed understands that requirements for change/opportunities for improvement may also come from consulting directly with regulatory bodies such as the HSE, BEIS SEPA and EA, issues arising from these engagements will be discussed with senior management and operational personnel as required. Where

changes to the management system are implemented, these will be communicated to the affected audience and monitored via the internal audit process as required.

3.9.3 Workforce Engagement

Exceed recognises the important role that the workforce has in maintaining a safe workplace. Safety awareness is promoted at all times and all personnel are made aware of their responsibilities, accountabilities and the expectations put upon them with regards to ensuring both their own safety and the safety of work colleagues.

As such Exceed consults widely with the workforce with respect to hazard awareness and limits to be observed to ensure safe operations. Exceed ensures the participation of the workforce in safety matters and secures their contribution to HSE activities through various means, including, but not limited to workshops and engagement sessions, poster campaigns and offshore management visits.

3.9.4 Safety Culture

Exceed strives to maintain and enhance a strong and positive safety culture, Exceed and Valaris QHSE policies. This includes but, is not limited to:

- Assume individual responsibility for QHSE
- Set a visible Leadership example of commitment to QHSE
- Consider QHSE as the main criterion in the decision-making process
- Act with the firm conviction that all incidents are avoidable
- Provide and demand individual responsibility in HSE from all co-workers, promoting positive recognition
- Be proactive in systematically identifying all QHSE risks, shortcomings, and opportunities for improvement
- Immediately correct shortcomings identified in QHSE, where practicable
- All personnel may stop work proceeding if there for any concerns associated with job/task
- Time Out For Safety (TOFS).

3.10 Emergency Response

Emergency response is governed by three Exceed procedures namely:

- Incident Management Procedure (**EXCEED-PRO-HSE-009**)
- Crisis Management Procedure (**EXCEED-PRO-HSE-014**)
- UK Onshore Oil Pollution Emergency Plan (OPEP) (**EXCEED-PRO-HSE-011**)

In addition, each project will have a project specific Emergency Response Plan (ERP) and Temporary Offshore Oil Pollution Emergency Plan (TOOPEP)/Communications Interface Plan (CIP), they document the interface arrangements bridging between Exceed, as the Well Operator and Non-production Installation Duty Holder.

Additional ERPs, OPEPs, TOOPEPs and CIPS will be developed and implemented where required.

Exceed's Emergency Response provisions follow a standard three tier emergency response structure, operated as illustrated below.

ER Teams are typically located as follows:

- **Rig Emergency Response Team**
 - Well Site, platform operator/drilling contractor teams supported by Exceed Offshore personnel if deployed offshore
- **Incident Management Team** (Restrata and Exceed personnel) – Exceed Primacy Incident (Oil Spill)
 - Tactical Response Located: Restrata Facility, Provender House, Waterloo Quay, Aberdeen
- **Crisis Management Team**
 - Strategic Response Located: Exceed Offices, 1 Rubislaw Terrace, Aberdeen
- Exceed will mobilise personnel to the Platform Operators/Drilling Contractors IMT to provide support in the event of an incident where the Platform Operators/Drilling Contractor has Primacy, i.e., Installation incident within the 500m zone

In addition to the detailed response teams Exceed has additional support available which can include, but not be limited to, sourcing equipment or logistics as well as the provision of additional resources such as senior technical advisors, drilling, subsea or completions/well testing personnel. This will come primarily from staff and long-term contract personnel, with additional support also available from trusted contractors held in the Exceed contractor database.

In the event of an Oil Spill from the well, the event where Exceed would hold primacy for the response, Key Exceed personnel are trained as follows:

- Senior Management – UKCS Oil Spill Lvl2 – Corporate Management of Oil Spill
- QHSSE Manager - UKCS Oil Spill Lvl3 – Oil Spill Responder
- Senior HSE Advisor – UKCS Oil Spill Lvl3 – Oil Spill Responder
- Wells Project Manager – UKCS Oil Spill Lvl2 – Corporate Management of Oil Spill
- Drilling Superintendent – UKCS Oil Spill Lvl2 – Corporate Management of Oil Spill
- Senior Wellsite Leader – UKCS Oil Spill Lvl1 (On Site Commander)
- Offshore HSE Advisor – UKCS Oil Spill Lvl1

3.10.1 Response Philosophy

The incident response philosophy described below shall be applied to all incidents and emergencies that impact, or have the potential to impact, People, Environment, Asset, Reputation or Sustainability (PEARS). The Exceed Duty Manager and IMT Lead shall use this philosophy to discuss the escalation potential and identify the appropriate onshore Tiered response and supporting structure.

Philosophy	Principle
(1) Overreact	Prevent an inadequate response caused by lack of early information.
(2) Assess	An assessment of the response can be made based on accurate incident information.
(3) Respond	Periodic assessment allows the response to be managed effectively.
(4) Stand down	Confirm that response teams are standing down, indicating clearly to all stakeholders that the emergency phase has ended.

This philosophy also applies to informing the relevant regulators, where they shall be informed of any ongoing issues that have the potential to escalate into a Major Accident, in accordance with the UK Regulator Engagement Procedure (**EXCEED-PRO-HSE-015**).

3.10.2 Incident Management Team

The function of the IMT is to provide support to the incident site (operational response) at a tactical level, manage supporting functions and report to the CMT to ensure cross-organisational awareness during incident response. Responsibilities include, but are not limited to:

- Planning immediate ER tactical Response
- Providing advice and support to the Worksite EMT
- Managing Logistics requirements
- Activating NoK / Relative Response
- Coordination of reception of evacuees, hospitalization of casualties and fatalities
- Coordination with regulatory authorities/local authorities
- Coordinating Specialist support teams
- Mobilisation of Tier 2/3 Oil spill response Contractor

3.10.3 Crisis Management Team

The CMT is under the leadership of the Crisis Management Team Lead. It provides the Strategic / Stakeholder Management Focus with primary responsibility for:

- Communicating with key stakeholders – shareholders, clients, media, partners, government departments
- Limiting the effects of the event on otherwise unaffected parts of the business
- Providing a strategic assessment/resolution for the situation
- Provide support, advice, and additional resources to the IMT
- Coordinating repatriation of personnel
- Authorises any extraordinary expenditure

3.10.4 Duty Rosters

Exceed implement a Duty Roster for IMT Duty Managers and CMT Leads, in addition to project specific Incident Support Team (IST) Duty Personnel, to ensure resources are always available to respond to an emergency as detailed within the Incident Management and Crisis Management Procedures.

3.10.5 Emergency Response Exercises

As a requirement of the Exceed WEP/DDEP, several ER Exercises are required for every project, namely:

- Simulation communications check
- Desk based-exercise - To embedded project emergency response provision in key personnel
- Full Simulation Exercise (SIMEX) - to exercise the projects Emergency Response Plan at all levels

In addition to the above project specific exercises the Exceed Onshore OPEP shall have a standalone exercise a minimum of once per year.

3.11 Accident and Incident Reporting

It is both an Exceed and legislative requirement that all accidents, incidents and near misses, safety and environmental, are reported and investigated. Exceed's Incident Reporting and Investigation Procedure (EXCEED-PRO-HSE-001) define Exceed's arrangements for internal and external reporting of all incidents and to define a structured approach to incident investigation, to prevent reoccurrence.

Incident investigation in accordance with this procedure is reserved for any well related incidents, any internal Exceed incident investigations and in instances where Exceed deem the MODU/Vessel/Platform owner's investigation to be insufficient and an Exceed investigation will be carried out in parallel.

3.11.1 Internal Incident Reporting

Operational incidents shall be reported in accordance with the project specific MSID and notified to the Head of Wells, UK Wells Manager and QHSSE Manager by the Wells Project Manager. Any Wells related incidents or any office-based incidents shall be reported to the project's HSE Advisor or QHSSE Manager, as appropriate, who will notify management

3.11.2 External Incident Reporting

All statutory reporting to regulators shall be the responsibility of the relevant Duty Holder for example, Exceed for a Well related incident, as Well Operator and the OIM for a MODU related incident, as detailed within the project specific MSID. Reports shall be prepared by the Duty Holder and submitted to the relevant regulatory authority.

Statutory reports for reportable incidents that occur within the Exceed office shall be prepared by the Senior QHSSE Advisor and submitted to the QHSSE Manager for review, approval, and submission to the relevant regulatory authority.

All communications with the regulators shall be in accordance with the Exceed UK Regulatory Engagement Procedure (EXCEED-PRO-HSE-015).

3.11.3 Incident Investigation

All incidents, i.e., injuries, illness, unplanned environmental releases, equipment/asset breakdown or damage, property damage and near misses' incidents shall be investigated to determine immediate and underlying causes, and identify and implement the necessary protective measures to prevent reoccurrence. Exceed supervisory personnel shall be included within the drilling contractor's investigation team as appropriate for Level II investigations and above.

Exceed's Incident investigation is reserved for Well related incidents, while acting as Well Operator, internal Exceed incident investigations and in instances where Exceed and the Client deem the drilling contractor's investigation to be insufficient. In this case a separate Exceed incident investigation shall be carried out, including a Client representative where appropriate.

Exceed's approved incident investigation methodology is Kelvin TOP-SET®. All incidents must be investigated using this methodology, in accordance with the investigation level criteria.

All incident reports (**EXCEED-FT-HSE-007**) shall include the following:

- Immediate cause(s) of the incident
- The underlying cause(s) and root cause identified during the investigation.
- Immediate corrective action(s) taken
- Actions to prevent reoccurrence
- Position responsible for completion of actions
- Target date for completion of actions

All summary of current Incident Reports will be reviewed during the monthly QHSE meetings, monthly management meetings and annually at the scheduled Management Review.

3.11.4 Lessons Learned

The QHSSE Manager or delegate shall prepare an Alert Bulletin (EXCEED-FT-HSE-016) to be shared with the wider Exceed organisation and project teams and any Lessons Learned captured within the Exceed Lessons Learned Database. Lessons learned should 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 should be engaged in the review of events, in order that an effective response can be made.

3.12 Competency and Training

Exceed is committed to the assessment and management of the competence of all employees and those working for, or on our behalf, and recognise the importance of an effective and consistent approach to the management of training and competence across the Company. The assessment of competence is a fundamental aspect of Exceed's Competence Management System (CMS).

The CMS applies to all employees and contractor personnel working for Exceed, whether based at the Company's, Client's or Third-Party's work sites, and will support the following:

- Selection and hiring of personnel
- Candidate pre-screening and onboarding
- Competence assurance of individual personnel and teams
- Certification and compliance
- Global mobility and succession planning
- Learning and development / appropriate training
- Competency assessment verification

Approved job descriptions are required for all existing and new positions within Exceed and are stored within the Job Description Pack (**EXCEED-FT-HR-001**). Job Descriptions provide key details about each position including job title, location, reporting relationships, external interfaces, job summary, duties, accountabilities, and responsibilities as well as defining experience, qualification and certification requirements. The job description informs the competence requirements for each Exceed role.

3.12.1 Competence

Within the CMS, a specific competency profile exists for each role and consists of both technical and non-technical human factor skills (including situational awareness, leadership, communication, teamwork etc.). The competency profiles for wells specific roles have been developed in accordance with the Oil & Gas UK Guidelines on Competency for Wells Personnel Revision 2 (2017).

The competency profiles for all Exceed roles are mapped in the master Competence Register (**EXCEED-FT-HR-011**) held within the Management System.

Each competency profile includes the components listed below.

3.12.1.1 Competence Elements and Levels

Competence elements are the specific competencies required for the role, and similar competence elements are grouped within wider categories. Each competence element is assigned a level (1-3) of proficiency required for the role. Level categorisation is described below.

- Level 1 – Awareness: Basic work activities. Most of which are routine and predictable. Work under guidance. Product checked in detail by Supervisor.
- Level 2 – Basic Application: Varied work activities performed in a range of contexts. Some individual responsibility or autonomy. Limited guidance needed. Results reviewed for quality but not in detail.
- Level 3 – Skilful Application: Broad range of work activities in a non-routine context. High confidence in the results. Work tested against business context. Significant personal autonomy

and may check others work. May possess formal national or internationally recognized certification in the subject areas.

Specific criteria for the assigned level of each competence element are detailed to define what is expected of the individual in order to be deemed competent at the specified level.

Exceed's subsurface clients commonly request the provision of industry leading expertise for tasks such as peer review, asset acquisition and due diligence support. As such, additional level 4 (Mastery/ Expert) competence elements are included in the Subsurface competence profiles to cover this requirement. This level categorisation is described below.

- Level 4 – Mastery/ Expert: Broad range of work. Complex technical or professional activities in a wide variety of contexts. At the highest level, able to apply fundamental principles across a wide and often unpredictable variety of contexts. Substantial personal autonomy. It is recognised that this competency level will not be present in all organisations in all subjects, but access may be needed to such individuals.

3.12.1.2 Competency Assessment Process

The Exceed Competency Assessment Procedure (**EXCEED-PRO-HR-005**) is summarised below:

1. Initial Competency Profile Update
2. Upload of Evidence to Competency Profile
3. Competency Assessor Review of Submitted Evidence
4. Face to face Competency Assessment Where No Evidence Available
5. Assessment Decision
6. Annual Competency Review

3.12.1.3 Service Provider Personnel

Service providers competency management systems are audited in accordance with the Exceed Audit, Non-conformance, Corrective and Preventative Action Procedure (**EXCEED-PRO-QA-002**).

Service Provider personnel's competency profiles and CVs will be reviewed by the applicable Project Manager to ensure the proposed Service Provider personnel are deemed competent for their role. Where a significant gap in competency exists and an intervention is not possible, a Competence Intervention Plan should be used to document the justification or mitigation in place.

3.12.2 Training

The HSE training needs of all personnel who may impact upon the health, safety and environmental performance of the company should be identified.

Mandatory and supplementary training courses are defined for each role within the master Training Matrix (**EXCEED-FT-HR-018**) and their completion is tracked and monitored.

The master Training Matrix is held within the Management System and any updates to the Competence Register must be coordinated through Document Control and approved by the relevant SME.

Each employee is given the opportunity to attend prioritised relevant training courses, seminars, industry events or conferences each year as identified through the annual appraisal process and funded by the annual training budget.

3.13 Regulatory Compliance

The Exceed Identification of Legislation and Compliance Procedure (**EXCEED-PRO-QA-004**) allows Exceed to identify and record HSE legislation and other any other regulatory or interested parties' requirements that apply to Exceed's operations. It also ensures that these records remain up to date for the purposes of legal compliance.

Exceed use the Weston Compliance COMPASS system to document relevant legislation in an online compliance register, with all compliance obligations mapped to the relevant parts of the Exceed management system to clearly demonstrate compliance. Through the COMPASS system new legislation and legislative updates are highlighted for action. With future changes raised through the Weston weekly update bulletin.

At project level a PLANC Register is prepared as a requirement of the WEP/DD&EP, to track and management permitting requirements. Exceed use Weston PLANC Manager to track and manage the submission of all UK permitting.

On receipt of any permits for well operations a project specific ESIA Commitments / Permit conditions Register will be prepared and tracked throughout operations and subject to periodic audit to ensure compliance with all requirements.

3.14 Monitoring and Measurement

Measurement of performance is an important element of how Exceed manages its business. As such, arrangements are in place for the ongoing or periodic monitoring of:

- Major Accident Hazards, health and safety hazards and environmental aspects as identified and documented in risk assessments and project specific environmental aspects registers, respectively.
- Progress against objective and targets.
- Leading and lagging indicators
- Audit findings
- Compliance issues, that is, against HSE permits, consents and license conditions.
- Other (non-regulatory) areas requested by regulatory bodies and/or trade associations, for example, Environmental Emissions Monitoring Systems Data.

Monitoring arrangements for significant HSE hazards and aspects will be reviewed as part of Exceed's annual QHSE Management Review. Changes to legislative requirements are managed in accordance with the Exceed Legislation and Compliance Procedure (**EXCEED-PRO-QA-004**) and will be identified and reviewed as they occur and amendments to monitoring and recording methodologies implemented as required. Forthcoming legislation is also considered during the Annual Management Review.

3.14.1 Internal Audit and Assurance

Internal audit of integrated Management System is carried out in accordance with an annual audit schedule developed by the QHSSE Manager and approved by Senior Management, as an output of the annual Management System Review (**EXCEED-PRO-QA-003**), in accordance with the Exceed Audit, Non-conformance, Corrective and Preventative Action Procedure (**EXCEED-PRO-QA-002**).

The preparation of the annual audit programme is risk based and ensures that the Well Management procedures related to Major Accident Hazard management are each audited on an annual basis, with other audits during the year of "key system content" of the two Management System documents **EXCEED-PD-CP-001** and **EXCEED-PD-CP-002**, ensuring all key procedures are audited over three years. The audit schedule can be adjusted, and scopes varied in response to operations, findings from previous audits or in response to an incident.

In addition to Exceed's internal audit programme, any scheduled external audits shall be included within the annual audit programme.

Any audit findings will be transferred to the Non-conformance Register, administered by the QHSSE Manager. These are then treated as internal an Improvement Reports (IR), findings investigated, and the subsequent development of suitable and timely corrective actions (and where necessary preventive actions) will be carried out by the "process owners".

The QHSSE manager shall track all corrective and preventative actions to close out and update the NCR Register as appropriate

3.14.2 Supplier Audit and Assurance

Supplier audits are carried out on a project-to-project basis, to ensure, sufficient QHSE management systems are in place and implemented to meet all regulatory and contractual requirements.

A supplier audit schedule is prepared for each project and documented within the project HSE Plan. The project's supplier audit schedule is prepared based on risk and past performance, focusing on those suppliers deemed Safety and Environmentally Critical to the operations before auditing other services. Suppliers that have been audited as part of another Exceed project within the last 12 months will not be included on the projects audit schedule unless there is an overriding reason for more audit focus (e.g., poor previous performance, incidents etc). Additional audits may still however be added as operational circumstances dictate.

The findings from supplier audit will be tracked to completion by the project QHSE Advisor recording within the NCR Register. Investigation of the findings and the subsequent development of SMART actions (and where necessary preventive actions) is the responsibility of Supplier management alone. However, Exceed will support and encourage Suppliers to complete investigation and implement suitable corrective and preventative actions.

3.14.3 Non-conformance, Corrective and Preventative Action

3.14.3.1 Internal Non-Conformance (Improvement Reports)

Areas of internal non-conformance may be formally captured through Internal Improvement Reports.

For non-conformance and findings raised from internal audits there is no requirement for Individual IR forms to be completed. Instead, they are “processed” by the QHSSE Manager or delegate using the Internal IR Register and verbal and e-mail communication channels. Investigation of the findings and the subsequent development of suitable and timely corrective actions (and where necessary preventive actions) will be carried out by the “process owners”. Close out activities for corrective and preventive actions are formal and follow-up for effectiveness of these is carried out by management and confirmed during subsequent audits as appropriate.

Weakness in or failure to adhere to Exceed internal management system arrangements (identified by any means other than audit) **shall** result in an Internal IR being raised. This is done via the online Internal IR Form which is accessible via the QHSSE Intranet site. This then generates the reference number, automatically adds the IR to the Internal IR Register and notifies the QHSSE Manager. The QHSSE Manager or delegate will then review the Internal IR and communicate with those involved to investigate and document any actions required to prevent reoccurrence. This may include working with the “process owner” to add clarifications to the procedure, providing additional training etc.

Exceed IR’s will be tracked until closure by the Exceed QHSSE Manager or delegate who will update the Internal IR Register as appropriate.

The Internal IR Register is held securely by the QHSSE team as it may contain information relating to individual personnel.

Sources of information for determining non-conformities and potential non-conformities could be, but are not limited to:

- Client Finding
- Service Defect / Reject
- Customer Comment / Complaint
- Meeting / Comment
- Training Need
- Safety Incident
- Environmental Issue
- Client Feedback score of less than 7.

The Exceed Audit, Non-conformance, Corrective & Preventative Action Procedure (**EXCEED-PRO-QA-002**) details the process in place for managing non-conformances, corrective, and preventative actions within Exceed.

3.14.3.2 *Supplier Non-Conformance (Improvement Reports)*

Upon identification of a weakness, failure or non-performing service or product by an Exceed supplier/contractor, other than by supplier audit, an Improvement Report (**EXCEED-FT-QA-003**) **shall** be raised by the Project Manager or delegate, and a relevant onshore project team member “owner” assigned. IR numbers for the Supplier Improvement Report **shall** be allocated by completing an IR Number Request form located on the QHSSE Intranet site. This will automatically add the IR to the Supplier IR Register.

The Project Manager, with assistance from the IR “owner”, **shall** ensure all Supplier IRs are tracked until they are closed, and the signed IR and relevant documentation are attached to the record on the Supplier IR Register.

3.15 Target Setting

Documented HSE objectives and targets are reviewed by Exceed senior management as part of the annual management review in line with the Exceed Health, Safety and Environmental Policies. When setting the annual targets Exceed senior management considers:

- Legal and other requirements
- Historical and current HSE performance
- HSE hazards (and aspects) identified by Exceed
- Commercial, operational and other business matters.

Further, as a minimum, the objectives and targets ensure legal compliance and also seek to minimise the impact of the HSE hazards identified by Exceed. To support the achievement of the objectives and targets a QHSE Plan is developed, and the requirements are communicated to all Exceed employees.

In addition to the annual HSE objectives, each project has a set number of leading and lagging HSE indicators which it is measured against.

A record of the objectives and targets set should be maintained, and progress evaluated on a regular basis. Overall performance should be reviewed as part of the Management System Review and provide input to future target setting activities.

3.16 Management Review

The Exceed QHSE Management Review is conducted annually following the requirements set out in the Exceed QHSE Management Review procedure (**EXCEED-PRO-QA-003**). Which describes the document

review process in place to meet ISO 9001:2015, ISO14001:2015, and ISO45001:2018. Responsibility of the review meeting lies with the Exceed QHSSE manager.

The management review follows the requirements for input as stated in ISO 9001, ISO 14001 and ISO 45001, and will cover the following items:

- Results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the organisation subscribes
- Communication(s) from external interested parties, including complaints
- Staff consultation and participation
- MAH management performance
- HS Incidents
- Environmental Incidents
- The environmental performance of the organisation
- The extent to which objectives and target have been met
- Status of corrective and preventative actions
- Follow-up actions from previous management reviews
- Changing circumstances, including developments in legal and other requirements related to its environmental aspects, and
- Recommendations for improvement.

The Exceed HSE Management Review follows the requirements for output as stated in ISO 14001 and ISO9001 and ISO 45001 containing the following:

- Changes required to QHSE related policies
- Recommendations for improvement of QHSE Management System and its processes
- Recommendations for improvement relating to its QHSE performance (new objectives or goals)
- Annual Audit Schedule
- Resource needs.

The records of the HSE Management Review comprises of the meeting agenda, any presentation materials and the minutes of the meeting which should detail any decisions or action points required to ensure the continued effectiveness and improvement of the management system.

3.17 Control of Documents and Records

Exceed documents are controlled in accordance with the Document Control & Management of Records Procedure (**EXCEED-PRO-QA-001**). All documents which are important to the way QHSE matters are managed within Exceed should be identified and mechanisms established for their control. This includes records which may be required to demonstrate compliance with legal and other requirements.

3.17.1 Documents

QHSE-related documents generated by Exceed should 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 arrangement, operational procedure, guidance and the templates and forms, documents, keeping a Controlled Documents Register for these. These documents all have specific “owners” and are reviewed on a periodic basis. The document hierarchy is described within the Management System Overview (**EXCEED-FT-QA-003**).

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

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 in accordance with a strict numbering regime. Such documents are managed by the Wells Project Manager in conjunction with the project team utilising the Project Master Document Register (MDR) Exceed Document Controller (who opens new “project” tabs) within the Central Document Register.

All “master” management system documents are held by the Exceed Document Controller in their source format (MS Word, Excel etc.) All user versions are available on the Intranet in read only format however templates are available for download. All printed copies, which are not formally issued, should be considered ‘uncontrolled’.

Document owners are responsible for ensuring that the content of key documents remains current by virtue of the review and revision process. In the event that modifications are required the owner should facilitate the required changes and forward the document (with its changes) to the Exceed Document Controller for upload to the server and for controlled distribution and withdrawal of obsolete paper versions as required.

3.17.2 Records

Exceed retains records to demonstrate compliance with management system and legal requirements. For project activity these are mainly collected together in the electronic “project file” hierarchy. This file hierarchy is retained at least for the life of the well. (Exceed currently retain project electronic records indefinitely). Project files are organised following a prescribed template file structure. Project or well specific documents are logged in Project Master Document Register (MDR) (**EXCEED-FT-QA-020**).

Other non-project specific management system records are retained in a file hierarchy on the IT system and hosted on the Exceed Egnyte site.

A list of records is maintained and is reviewed on an annual basis. Which details storage method, retention time and ultimate disposal method. The IT Department controls ensure that data is back-up offsite regularly.

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.. The required contents of such files are governed by procedure, as is the requirement for the extent of distribution.

All hard copy records which are required to be retained by Exceed are collected in the relevant project/well files or the subject folder until such time as the material is passed to the Exceed Document Controller for longer term storage/archiving.

The Exceed Document Controller ensures that hard copy archives are managed via a specialist supplier. Wells Project Managers will also save electronic project records to a project specific location.



EXCEED
Leading Energy Transformation

EXCEED-GD-HSE-005 SEMS Overview Rev2

Final Audit Report

2025-06-25

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