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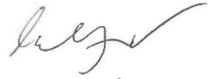
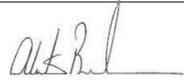
Leading Energy Transformation

DOCUMENT	ESG STRATEGY
LEVEL	POLICY DOCUMENT
DOCUMENT No.	EXCEED-PD-CP-041
REVISION	1
DATE	29.03.2023

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APPROVAL & ISSUE SUMMARY

Document Approval

EXCEED				
	TITLE	NAME	SIGNATURE	DATE
Author:	QHSSE Manager	Mike Wright		29.03.2023
Reviewed By:	Head of Wells	Al Brockie		30.03.2023
Approved By:	Managing Director	Ian Mills		30.03.2023

Issue Summary

Issue Number	Date	Description of Revision or Amendment
0	15.06.2021	Issue for Use
1	29.03.2023	Review and Update of Initiatives

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

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1 INTRODUCTION

The Exceed Group is engaged in the provision of Well and Decommissioning Project Management, Engineering, Managed Pressure Drilling 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".

1.1 Purpose & Scope

Exceed endeavours to be a proactive partner, leading by example and engaging with key organisations and stakeholders to contribute to the evolution of the Energy Sector and reducing CO₂ emissions, through the Energy Transition journey.

This strategy document outlines Exceeds approach to ESG and how the company continually improves ESG performance, while positively influencing our clients and supply chain to meet Exceed's standards.

This strategy applies to all Exceed's services and activities globally.

1.2 Responsibilities

1.2.1 Managing Director

The Exceed Managing Director (MD) shall ensure the requirements of this document are met and that suitable resources are available to support this scope.

1.2.2 Senior Legal Council

The Exceed Senior Legal Council is responsible for:

- Ensuring legal compliance
- Implementation of Governance initiatives

1.2.3 QHSSE Manager

The Exceed QHSSE manager is responsible for:

- ESG Strategy Implementation
- ESG Performance Monitoring
- ESG Performance Reporting

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2 MATERIALITY

In order to identify the ESG aspects that are pertinent to our business activities, as well as determining the relative importance and impact of these, Exceed has undertaken a materiality assessment covering all aspects of our business.

The assessment follows a recognised risk-based approach for identifying ESG aspects, determining the importance of these aspect to Exceed and subsequently the importance of these aspects to our key stakeholders.

The output from the materiality assessment is used for ensuring that Exceed focuses on developing ESG initiatives that are pertinent to our organisation and operations.

The materiality assessment is updated on an annual basis in line with our ESG reporting calendar.

3 ESG ALIGNMENT AND DISCLOSURES

3.1 The United Nations Sustainable Development Goals

3.1.1 General

In 2015 world leaders identified and committed to the UN Sustainable Development Goals, or UNSDGs, creating a guiding framework for sustainable, ethical, and responsible development across the world. Since 2015 increased global concerns relating to climate change, the global disparity of wealth and the world's economies has brought the UNSDGs into sharp focus.

These selected UNSDGs are material to the company and are the key ESG benchmark for Exceed, incorporating Exceed's desire to have a positive impact not just on operations but, also in the communities and countries in which we operate.

As Exceed grows and the energy transition evolves, these UNSDGs help guide the way Exceed does business to ensure that we manage our environmental and social risks and where possible influence our supply chain and clients to strive for continual improvement in ESG performance and positively contribute to the attainment of each materially relevant goal.

The UNSDGs provided the foundation upon which additional standards are applied for specific material ESG aspects.



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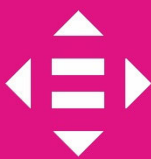
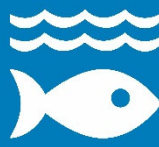
3.1.2 Exceed – Selected Sustainability Goals

The UNSDGs span a broad range of aspirations, from ending poverty to climate action, based on a materiality assessment Exceed have selected key UNSDGs, relevant to the business as the foundation of our approach to ESG. These goals help define the monitoring requirements of Exceed's performance and our drive for continual improvement.

3.1.3 Social

	Material Aspects Diversity and Inclusion Local Content CSR Human Rights	Exceed – Approach - Exceed Trust – International initiatives - Exceed Trust – Local initiatives - Local Content Plans
	Material Aspects Safety of Staff Health Staff	Exceed – Approach - Good Health and Wellbeing of all Exceed staff and contractors - Positive work environment and active safety management - Private medical provision for staff - Health initiatives
	Material Aspect Professional Development CSR	Exceed – Approach - Provides continuous learning and professional development support for staff - Exceed Trust - Ghana University scholarship programme
	Material Aspect Diversity and Inclusion	Exceed – Approach - Does not discriminate against gender - Does not distinguish remuneration by gender

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8 DECENT WORK AND ECONOMIC GROWTH 	Material Aspect Health of Staff Professional Development Human Rights Local Content	Exceed – Approach • Provides a comfortable and flexible working environment for its employees. • Regularly benchmarks its pay scales • Carries out due diligence on suppliers
10 REDUCED INEQUALITIES 	Material Aspect Diversity and Inclusion Local Content	Exceed – Approach • Offers good quality incomes for its employees • Offers equal opportunity to all its employees regardless of sex, race, religion, or ethnicity. • Supports the integration of local content in the workforce
3.1.4 Environment		
12 RESPONSIBLE CONSUMPTION AND PRODUCTION 	Material Aspect Waste Management Supplier Management	Exceed – Approach • Endeavours to resource and utilise sustainable products and materials • Minimise waste and maximise reuse and recycling • In project operations, optimises material requirements to minimise waste generated.
13 CLIMATE ACTION 	Material Aspect CO ₂ e Emissions Flaring Env Management	Exceed – Approach • Minimise CO₂ emissions and offset against the remaining • NetZero initiatives to achieve Exceed NetZero. • Track operations CO₂ emissions on behalf of our clients and offer an offset facility for their project related emission
14 LIFE BELOW WATER 	Material Aspect Env Management Chemical Use Waste Management Oil Spill	Exceed – Approach • ESIA/ENVIDS for all offshore operations • Selecting and use of PLONOR chemicals • Monitored and managed discharges during operations to minimise impact on the marine environment

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Material Aspect
Env Management
Waste Management
Community Engagement

Exceed – Approach

- ESIA/ENVID for onshore operations
- Waste Management Plans
- Community engagement

3.1.5 Governance



Material Aspect
Legal Compliance
Ethics & Transparency
Human Rights

Exceed – Approach

- Business Code of Conduct
- Anti-bribery and Corruption Policy
- Ant-slavery & Human Trafficking Policy
- Anti-facilitation of Tax Evasion Policy
- GDPR Compliance



Material Aspect
Partnerships
Energy Transition
Management of Business Risk

Exceed – Approach

- Active members of industry bodies
 - OEUK
 - Step Change in Safety
 - IADC
 - IOGP
- Collaborative partnerships with trusted suppliers

3.2 The Task Force for Climate-related Financial Disclosures (TCFD)

Exceed recognise the importance of aligning with global initiatives that support our ESG ambitions. In addition, it is important for Exceed to align with initiatives that reflect the ESG strategies and challenges of our clients.

Exceed have committed to develop our ESG report to support the recommendations of the Task Force for Climate-related Financial Disclosures (TCFD). Our annual ESG report will define those part of our business that fall under the definitions of the TCFD and identify opportunities, objectives and targets for improvements.

3.3 The Sustainability Accounting Standards Board (SASB)

The Sustainability Accounting Standards Board (SASB) is a voluntary ESG benchmarking agency that is recognised by many of our key clients as well as international investors. Exceed will align its annual ESG communications to report against those aspects of SASB which are material to our core business. This will enable Exceed to demonstrate compliance and ongoing improvement with a benchmark that is well used and recognised in our sector.

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4 EXCEED SYSTEMS

Exceed's ESG performance is governed by the implementation of the Exceed Integrated Business Management System. This ensures that Exceed's business and operational standards are maintained for any project throughout the world, controlling all aspects of work from studies, stakeholder engagement, well design through operations, well handover and close-out. This system shall be followed on every project Exceed conducts.

These controls are formalised into a hierarchical document structure that relates to the highest-level Policies.

This system is externally certified to the globally recognised standards of ISO9001:2015, ISO14001:2015 and ISO45001:2018.

Key Management System documents relating to ESG management are detailed below.

#	Document	Environment	Social	Governance
1	Exceed QHSE Policy	X	X	X
2	Exceed Aspects Register	X		
3	Exceed Management of Well Engineering Projects	X	X	X
4	Exceed Well Execution Process	X	X	X
5	Exceed Decommissioning Execution Process	X	X	X
6	Exceed Risk Management for Well Operations	X	X	
7	Exceed Office Handbook	X	X	X
8	Exceed Project Specific ESAs /ENVIDS	X		
9	Exceed Project Specific Plans/ Programmes	X	X	
10	Exceed Waste Management Procedure	X		
11	Exceed Procurement Management Procedure			X
12	Exceed Management Review Procedure			X
13	Exceed Code of Conduct		X	X
14	Exceed Anti-bribery and Corruption Policy		X	X
15	Exceed Anti-slavery & Human Trafficking Policy		X	X
16	Exceed Anti-facilitation of Tax Evasion Policy		X	X
17	Exceed Staff Handbook		X	X

5 PERFORMANCE MONITORING

Exceed **shall** monitor ESG performance, using the metrics below, for both Exceed internal functions and those generated during project operations on behalf of our clients. These metrics **shall** be reported monthly, quarterly, or annually, to the senior management team, employees, key stakeholders, and regulators, as appropriate. All ESG performance **shall** be reviewed by Senior Management, a minimum of annually during the Exceed annual QHSSE Management Review.

5.1 Environmental

	Metric	Scope		Control		Frequency		
		Office	Project	Full	Influence	Monthly	Quarter	Annually
Environmental	Energy Use	X		X				X
	CO ₂ Emissions Office	X		X				X
	CO ₂ Emissions Flights	X	X	X	X			X
	CO ₂ Emissions Ops		X		X	X	X	X
	CO ₂ Offset	X	X	X	X		X	
	Waste Recycled	X	X	X	X	X	X	X
	Waste Diverted from Landfill	X	X	X	X	X	X	X
	Env. Near Miss		X		X	X	X	X
	Env. Incidents		X		X	X	X	X
	Env. Audits	X	X	X	X	X	X	X
	Env. Inspections		X		X	X	X	X
	ESIA's		X		X		X	
	Sustainable Products	X		X				X

5.2 Social

	Metric	Scope		Control		Frequency		
		Office	Project	Full	Influence	Monthly	Quarter	Annually
Social	Exposure Man-Hours	X	X	X	X	X	X	X
	Lost Time Incidents	X	X	X	X	X	X	X
	Recordable Incidents	X	X	X	X	X	X	X
	Safety Cards	X	X	X	X	X	X	X
	HSE Inductions	X	X	X	X	X	X	X
	H&S Haz-Hunts	X	X	X	X	X	X	X
	H&S Audits	X	X	X		X	X	X
	ER Drills & Exercises	X	X	X	X	X	X	X
	Employee CPD (Hours)	X		X			X	X
	Employee Sick Days	X		X			X	X
	Diversity: Gender Balance	X		X			X	X
	Diversity: Ethnicity Balance	X		X			X	X
	Diversity: Age Balance	X		X			X	X
	Community Engagement		X		X	X	X	X
	Local Content		X		X	X	X	X
	Exceed Trust Projects	X		X			X	X
	CSR Donations	X		X			X	X

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5.3 Governance

Governance	Metric	Scope		Control		Frequency		
		Office	Project	Full	Influence	Monthly	Quarter	Annually
	ESG Risks & Opportunities Assessments	X		X				X
	Senior Management Town Hall / HSE meeting attendance	X		X			X	X
	Senior Management Site Visits		X	X			X	X
	Management Engagement with Industry bodies - ESG	X		X			X	X
	Client Engagement with Exceed ESG Initiatives		X		X		X	X
	Completed Supplier Due Diligence	X		X		X	X	X
	% Suppliers signed up to Exceed HSG Self-Compliance Statement	X	X		X		X	X
	Tendering Responses including ESG content		X		X		X	X
	Engagement of Local Partners	X	X	X			X	X
	Training hours on ESG	X		X			X	

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6 REPORTING

To effectively communicate Exceed's annual ESG performance to all stakeholders, Exceed shall prepare and publish an annual ESG Report. This report shall be available to download from the Exceed Website and provides guidance for stakeholders on Exceed's approach to sustainably managing our business and our performance in achieving our goals.

Based on the output from Exceed's materiality assessment the monitoring and reporting of ESG performance shall be written to comply with the following standards, in addition to the UNSDGs:

- Taskforce for Climate-related Financial Disclosures (TCFID)
- SASB: Oil and Gas Exploration and Production Standard

7 ESG DEVELOPMENT

ESG management is integrated within the management system, key initiatives and areas for continuous improvement are detailed below, divided into Internal (where Exceed has control) or Supply Chain (where Exceed has influence only).

7.1 Exceed – Internal

Aspect	UNSDG	Current Initiatives	Improvements Actions	Dept.	External Support
Environmental	CO ₂ Generation	13 CO ₂ generation is calculated and monitored for all Exceed flights. Targets set on reduction per head within annual QHSSE Plan	Agree boundaries and expand CO ₂ monitoring to include further aspects of the business, including utility usage.	QHSSE Resourcing Office Admin	Corporate Traveler
	CO ₂ Offset	13 Annual offset payment for flights CO ₂ only	Extend offset payment to include all Exceed controlled emissions	QHSSE Finance	ITPE
	Power Usage	12 13 Gas and electricity usage tracked on an annual basis.	Switch energy provider to a renewable only electricity provider. Introduce energy saving initiatives in the office e.g., switch it off at night	QHSSE Finance	N/A
	Net Zero	13 No movement towards NetZero.	Develop Netzero roadmap in 2024 to identify key strategic management decision points and prepare a Netzero Plan. Set ambitious but realistic Netzero achievement date.	QHSSE Senior Management	ITPE
	Waste Generation	12 14 15 Waste recycling of waste streams collected by the council. Waste volumes per year estimated by volume. Waste reduction targets set	Increase recycling options through the use of a 3 rd party waste carrier. Introduce paper use reduction initiatives Plan and work towards Zero Waste to Landfill.	QHSSE Office Admin All Staff and Contractors	N/A
	Sustainable Procurement	12 Limited procurement of sustainable office consumables.	Update procurement procedures to include sustainable consumables.	QHSSE Office Admin Finance	N/A

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Aspect	UNSDG	Current Initiatives	Improvements Actions	Dept.	External Support
			Review all office consumable and source sustainable alternatives.		

	Aspect	UNSDG	Current Initiatives	Improvements Actions	Dept.	External Support
Governance	Leadership	All	Weekly touch-base meetings Attendance at HSE Meetings Open door policy	Senior Management roll out of ESG plans and engagement with staff.	Senior Management	N/A
	ESG Focus	All	Current promotion of HSE standards, performance, and initiatives	Focused ESG sessions with personnel, lunch & learns, webinars etc.,	QHSSE Senior Management	N/A
	Approved Vendors	10 12 13 16	Due diligence of vendors includes H&S and Env aspects including HSE performance	Update Due Diligence requirements to request specific ESG company information and strategy.	Legal Contracts	N/A
	Contracting	10 12 13 16	Standard MSA's incorporate HSE requirements	Update contracts to include specific ESG elements. Where appropriate incentivise ESG e.g., fuel usage for MODU's and attendant vessels.	Legal Contracts	N/A
	Monitoring	All	Current ESG performance monitored in separate silos	Integrate ESG performance metric monitoring within a single tracker. Include an ESG Reporting Dashboard linked to the tracker	QHSSE	ITPE
	Reporting / Communication	All	A selection of ESG metrics are reported during the annual management review. Project ESG metrics are reported only at a project level.	Develop an ESG performance dashboard for regular ESG performance reporting to the Senior Management Team. Prepare and publish an Exceed annual ESG report.	QHSSE All Departments	Think PR
	Partnerships	17	Members of: -Step Change in Safety -OEUK -IADC -IOGP	Identify and join industry ESG specific working groups. Actively engage in Industry Energy Transition working	Senior Management	Suppliers Industry Bodies

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Aspect	UNSDG	Current Initiatives	Improvements Actions	Dept.	External Support
			groups. Engage and collaborate with key service companies/ suppliers on ESG		
Energy Transition	13	Several key new project categories identified. Initial BD focus	Prepare an Energy Transition, road map including timeline and key strategic management decisions points. Prepare and implement Energy Transition Action Plan	Senior Management Business Development All Staff	ITPE

7.2 Exceed – Supply Chain

Aspect		UNSDG	Current Initiatives	Improvements Actions	Dept.	External Support
Environmental	CO ₂ Generation MODU/ Vessels/ Helis	13	Fuel use tracked and emissions calculated against expected emission detailed within the project permitting.	Incentivise fuel efficiency within contracts. During vessel tendering include a fuel efficient, high env performance option to the client, e.g., Hybrid Vessels	QHSSE Wells Legal Contracts	N/A
	CO ₂ Other	13	Currently no other emissions are calculated for Ops.	Track fuel use and emissions for onshore plant, flights out with Exceed and logistics deliveries to hub e.g., long leads	QHSSE Finance	ITPE
	CO ₂ Offset	13	No Exceed offset Well Operations emissions	Identify and offer a rechargeable carbon offset payment to the operator. This should be tiered based on agreed boundaries for emissions	QHSSE Wells Finance	N/A
	Flaring	13	Flaring during a well test or well completion is challenged to ensure the minimum flaring is required.	Identification and promoting of more efficient flaring technologies to be integrated into planning.	QHSSE Wells	N/A

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Aspect	UNSDG	Current Initiatives	Improvements Actions	Dept.	External Support
		Emissions are calculated and reported.			
Chemical Usage	14	Existing Exceed Management System Exceed Project Specific ESAs /ENVIDS	Referencing specific OSPAR requirements in contract or agreements with clients	QHSSE Office Admin Finance	N/A
Waste Generation	14 15	Project specific Waste Management Plans implemented. Waste targets % diverted from landfill.	Incentivise waste management targets to encourage reduction, reuse, and recycling. Increase WMP to achieve Zero Waste to Landfill	QHSSE Wells	N/A
Sustainable Procurement	12	Only HSE performance and management systems included within tender evaluations.	Include ESG strategy and performance in tender evaluations. Request specific commitments to ensure industry best practice Consider incentivisation of environmental performance	QHSSE Wells	N/A
Env Impact	12 14 15	ESAs or ENVIDS carried out as appropriate for all projects, with mitigation measures identified and implemented. Currently generation of emissions are not estimated and used to inform planning decisions.	Design an application to easily identify emissions changes in relation to changes in planning of well operations and associated logistics.	QHSSE Wells	ITPE
Oil Spill	14 15	OSCPs in place for all Exceed Projects ER exercises carried out prior to operations and prior to high-risk activities.	Further Crisis Management training of key personnel. Additional training for responders	QHSSE Wells	N/A

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Aspect	UNSDG	Current Initiatives	Improvements Actions	Dept.	External Support
		Oil spill training for key personnel and all duty managers			

Aspect		UNSDG	Current Initiatives	Improvements Actions	Dept.	External Support
Social	Safety of Staff	3 8	Management Systems Bridging Stop Cards Intervention Incentivisation Haz Hunts Site Inspections / Audits	On prolonged campaigns, specific risk-based safety initiatives	QHSSE All Staff	Suppliers
	Health of Staff	3 8	Tropical disease management e.g., Malaria Medical Insurance, including repatriation MERP’s in place for international projects COVID-19 Management Medicals	None currently required	QHSSE HR	NHS
	Local Content	5 8 10	Local content utilised where practicable, commensurate with the project size and location. Local service providers utilised where practical	Include local content in professional development programmes in locations where Exceed will have a lasting footprint.	Wells HR Legal	N/A
	Community Engagement	1 4 8	Exceed engagement with the community as part of the client’s engagement during the ESIA process and project planning and execution	Where Exceed is likely to have a lasting footprint engage with the local community as their own entity.	Exceed Trust Senior Management Legal Finance HR	N/A

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Aspect	UNSDG	Current Initiatives	Improvements Actions	Dept.	External Support
Governance	Leadership	All	Senior management rig visits and presence at DWOPs etc. required, with targets set.	QHSSE Wells	N/A
	ESG Focus	All	Environmental awareness included as part of the project inductions. Initiate ESG specific initiatives onboard.	QHSSE Wells	N/A
	Monitoring	12 13 16 17	MODU, vessels and helicopters emissions calculated and tracked. Waste and rig discharges tracked. However, silo 'ed in project.	QHSSE Wells	N/A
	Reporting / Communication	12 13 16 17	Reporting confined to projects for both Wells and PI Include project level ESG metrics into company-wide tracking and dashboard and include within annual ESG report. Expand on PI achievements on a project add an additional ESG framework. i.e., time saved, manhours HS exposure reduction, emissions reduction etc.	QHSSE Wells PI	N/A
	Partnerships	All	Limited collaboration during short term wells. For longer term projects and campaigns, collaborate with client, drilling contractor and service companies with integrated ESG goals. Work with trusted partners to share ESG initiatives and success stories.	QHSSE Wells Senior Management Exceed Trust	N/A

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8 CARBON OFFSET

For carbon offsetting to be consistent with a net zero ambition, Exceed follows a strategy to eliminate or reduce their direct emissions before using Carbon offsetting to balance any residual emissions. To fully align with a net zero ambition, offsetting must directly sequester greenhouse gases from the atmosphere (e.g., through reforestation and not renewable energy production).

Exceed only purchase carbon offset credits that are certified through a reputable certification program. This ensures the offsets are credible and meet requirements regarding methodology and third-party verification.

In addition to the offsetting of Exceeds emissions, Exceed offers to develop an offset programme for client's operations to meet their ESG goals and will offer Carbon Neutral well operations using certified programmes, through reduction of emissions and offset of residual for drilling unit, vessels and helicopter emissions.

Certification Program	Projects in Sub-Saharan Africa	African Countries	Global Projects
Gold Standard	- Clean/efficient cooking stoves - Safe water access	Rwanda, Chad, Kenya, Mozambique	Honduras, Peru, India, China, Romania, Cambodia, Guatemala, Mexico and more.
Verified Carbon Standard (VCS)	- Reforestation and revegetation - Avoiding deforestation and degradation - Clean/efficient cooking stoves - Renewable energy production e.g., solar, hydro	Uganda, Kenya, Tanzania, Rwanda, Ghana, Madagascar, Sierra Leone, Zimbabwe, South Africa, Congo, Mozambique, Angola, Niger, etc.	China, India, Vietnam, Cambodia, Turkey, Romania, Spain, Mexico, Panama, Brazil, Colombia, Uruguay, Peru and more.
Climate, Community & Biodiversity (CCB) Standards	- Reforestation and revegetation - Avoiding deforestation and degradation	Uganda, Kenya, Tanzania, Congo, Malawi, Zimbabwe, Madagascar, Zambia	China, India, Indonesia, Pakistan, Philippines, Myanmar, Spain, United Kingdom, Mexico, Colombia, Uruguay, Peru and more.
The Plan Vivo Standard	- Reforestation and revegetation - Avoiding deforestation and degradation	Kenya, Malawi, Uganda, Tanzania, Madagascar, Ethiopia, Burkina Faso	Bolivia, Indonesia, Nicaragua, Fiji, Sri Lanka, Mongolia, New Zealand, Mexico
Credible Carbon	- Low-carbon housing development - Waste handling and disposal - Regenerative agriculture	South Africa	South Africa focussed.

9 ESG PRIORITY INITIATIVES

Based on Exceed's materiality assessment key ESG initiatives have been prioritised to deliver improved ESG performance in current aspects.

ESG performance and the materiality assessment are reviewed in accordance with the Exceed Management Review Procedure (EXCEED-PRO-QA-003). During management reviews ESG priorities, targets and objectives shall be set for the coming year and included within the Exceed annual QHSE Plan.

Based on this review of performance and achievement of objectives this strategy shall be reviewed and updated.

Current ESG initiatives that have been given priority are as follows:

ESG Aspect	Materiality	Initiative	Responsible
General			
Monitoring	High	Develop or select a platform to record, monitor and present ESG performance metrics	Exceed QHSSE Exceed Wells Exceed Management
Environment			
Indirect CO ₂ Emissions (Scope 3)	High	Development and implementation of "Carbon Neutral Well Operations" concept	Exceed Wells Exceed QHSSE
Direct CO ₂ Emissions (Scope 1 and 2)	High	Expand CO ₂ monitoring to include further aspects of the business, including utility usage. Extend offset payment to include all Exceed controlled emissions Plan and implement Plan for Exceed to achieve net Zero by 2026.	Exceed QHSSE Exceed Finance Exceed Management
Environmental Management and Compliance	Medium	Update of legal compliance registers and integrated evidence of compliance using Weston Compass Compliance.	Exceed QHSSE
Waste Management	Medium	Increase recycling options through the use of a 3rd party waste carrier. Introduce paper use reduction initiatives Plan and work towards Zero Waste to Landfill	Exceed QHSSE Exceed Finance Exceed Management Exceed staff
Supplier Environmental Performance	High	Request specific commitments to ensure industry best practice Consider incentivisation of environmental performance	Exceed QHSSE Exceed Legal Exceed Contracts & Procurement

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REVISION	1
DATE	29.03.2023

ESG Aspect	Materiality	Initiative	Responsible
		ESG information addition to Exceed supplier due diligence.	
Social			
Human Rights	High	Strengthening of Due Diligence on supplies and clients.	Exceed Legal Exceed Contracts & Procurement
Governance			
Energy Transition	High	Prepare an Energy Transition, road map including timeline and key strategic management decisions points. Prepare and implement Energy Transition Action Plan	Exceed Management
Supply Chain Governance	High	Additional ESG metrics added to Due Diligence information requests. ESG aspects included within ITTs and their evaluations. Contractual incentives for better ESG performance.	Exceed Legal Exceed Contracts & Procurement
Reporting and Communication	Medium	Annual ESG Performance Report SASB and TCFD compliant reporting	Exceed QHSSE
Data Protection & Security	High	Development of required IT related procedures and processes to ensure consistency and continual improvement	Exceed IT Exceed QHSSE



EXCEED

Leading Energy Transformation