



EXCEED

Leading Energy Transformation

DOCUMENT	CORPORATE MAJOR ACCIDENT PREVENTION POLICY STATEMENT
LEVEL	POLICY STATEMENT
DOCUMENT No.	EXCEED-PS-CP-004
REVISION	5
DATE	21.04.2025

APPROVAL & ISSUE SUMMARY

Document Approval

EXCEED				
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Issue Summary

Issue Number	Date	Description of Revision or Amendment
A	11.05.2016	Draft updated to meet OSDR requirements. For review/issue for use
1	10.06.2016	Review comments incorporated – For Issue
2	25.07.2017	IM job title amendment and inclusion of environmental function
3	29.07.2019	Document template update
4	15.05.2022	CMAPP Review and Update
5	21.04.2025	Reviewed and Issued for Use

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TABLE OF CONTENTS

1	Introduction.....	4
2	Leadership.....	4
3	Command & Control.....	5
4	Health, Safety and Environmental Culture.....	6
5	Safety & Environmental Protection Standards.....	7
6	Barrier Management.....	7
7	Competence	8
8	Communications.....	8
9	Collection and Recording of Data	9
10	Emergency Response Contingencies	9
11	Compliance.....	9

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1 INTRODUCTION

Health Safety and Environmental protection are core Exceed values and the foundation of all Exceed's business. These core values can only be realised through the promotion of a positive HSE and operational culture.

As a Well Management Company and Well Operator, the nature of Exceed's operations have the potential to give rise to Major Accidents including those that could also result in a Major Environmental Incident. Exceed is committed to achieving high standards of safety and environmental performance, a key objective being to reduce and maintain the risks associated with major accidents at a level as low as reasonably practicable throughout the lifecycle of assets Exceed are responsible for, both within the UK and internationally.

The foundation for achieving this objective is the implementation of the Exceed QHSE management System (QHSEMS) which is designed to ensure that risks to personnel and the environment are addressed in an integrated manner and that our well operations are well designed, constructed, safely operated, well integrity monitored and maintained and safely abandoned. Key elements of the QHSEMS are outlined within this Corporate Major Accident Policy (CMAPP).

All Exceed personnel are responsible for the implementation of this CMAPP. The Exceed Senior Management Team are committed to providing effective and visible leadership to ensure continuous safe operations, with no damage to the environment.

2 LEADERSHIP

Clear and positive safety and environmental leadership is at the core of managing major hazards. Senior Management, Line Managers and Supervisors ensure on a continuous basis that the CMAPP is suitable, implemented, and operating as intended through various activities including:

- Ensuring that suitably competent resources are provided to implement, and maintain the CMAPP and associated arrangements
- Defining and communicating acceptable process safety and environmental performance levels at a corporate, operational and project level
- Monitoring and review of process safety and environmental key performance indicator (KPI) information
- Monitoring and reviewing the status, quality, and effectiveness of key QHSEMS systems and processes, for example:
 - Leading indicator performance
 - Audit findings
 - Incident investigation reports

- Monitoring compliance with the CMAPP and QHSEMS during work site visits
- Intervention when potential infringements of the CMAPP are identified
- Annual management review of the CMAPP and QHSEMS
- Communicating the findings from monitoring and review activities and ensuring appropriate remedial action is taken where necessary
- Visible HSE Leadership through:
 - Leading of HAZOP/HAZID, ENVID, DWOP/CWOP/TWOP and pre-spud meetings
 - Regularly highlighting MAH and controls
 - Engaging with key risk assessments
 - Engaging with peer reviews, stage gates and readiness reviews
 - Visibly support the Installation Operator's and service company's personnel
 - Lead project inductions, including environmental sensitivities onboard the installation
 - Regular HSE walk arounds and audits
 - Prepare daily work instructions in consultation with the Installation Operator and service companies
 - Leading 'Toolbox Talks' and Pre-towers
 - Engaging with installation operators HSE meetings and initiatives
 - Highly visible supervision on the work site

3 COMMAND & CONTROL

Personnel roles and responsibilities are well defined, and a functional line organisational structure promotes clear communication and reporting lines and means of escalation, throughout the Company and individual projects.

Command and control procedures are maintained to support both offshore and onshore operations that ensure:

- Operating procedures and programmes for safe operation are developed, implemented and reviewed on a regular basis
- Foreseeable emergencies are identified, and suitable response plans are put in place that are subject to drills and reviews to test the effectiveness
- Onshore management oversight and control of operations through activities such as:
 - Daily conference calls with offshore management teams
 - Daily review of offshore operational, safety, and environmental performance reports
 - Daily review of safety interventions
 - Regular Meetings and conference calls with Wellsite Leaders
 - Daily Client meetings
 - Daily Production Operations meetings as appropriate
 - Monthly Well Integrity Reviews
 - Annual Well Integrity Review

- Approval or WORAs
- Approval of operational risk assessments
- Approval of change under MoCs
- Participation in incident investigations
- Directing the response strategy in an emergency

4 HEALTH, SAFETY AND ENVIRONMENTAL CULTURE

Exceed is committed to developing and maintaining a strong Quality, Health, Safety & Environmental (QHSE) culture for all parties associated with the company and its operation and the preservation of the environment in which we operate. Exceed expects all personnel to fully co-operate and engage in undertaking their QHSE duties at all levels of their organisation. Additionally, all Exceed personnel are empowered and expected to 'Stop the Job' and hold a 'Time Out For Safety' if they perceive an immediate risk to personnel or the environment.

Engagement of the workforce is needed in the promotion and achievement of a strong QHSE culture. Arrangements in place to promote a strong QHSE culture throughout our workforce include:

- Provision of suitable managerial, operational and technical support to aid operational decision making
- QHSE inductions for employees and contractors
- Provision of training in major accident hazard awareness
- Engaging the workforce in performance reviews and improvement initiatives
- Working effectively with elected safety representatives and/or safety officers and the Exceed Health & Wellbeing Committee and ESG groups
- Participation in tripartite consultations between regulators, workers and duty holder during operations and through industry forums and committees. And the implementation of the actions arising from consultations
- Visibly support the Installation Operator's management systems service company's personnel
- Encouraging and rewarding good QHSE performance
- Encouraging the reporting of accidents and near misses
- Protecting whistleblowers

Desired behaviours are recognised and rewarded through various systems, schemes, and initiatives within Exceed including:

- Project-specific individual QHSE award scheme based on safety and environmental interventions
- Participation in industry QHSE award schemes
- Exceed Work SMART scheme
- Appraisal and promotion processes

5 SAFETY & ENVIRONMENTAL PROTECTION STANDARDS

QHSE Performance is enhanced and major accident hazard risk minimised by using sound safety and environmental protection standards, integrated within the QHSEMS well management procedures. Our policy in this respect is:

- To apply standards that meet or exceed UK regulatory requirements, regardless of the country of operations
- Information on regulations, codes, standards and practices is kept current
- To have processes in place to evaluate new or updated legislation and standards
- Changes in standards must be evaluated and managed to ensure risks remain at an acceptable level
- Deviations from approved standards must be approved by an appropriate level of Management under an MoC
- To monitor compliance with statutory requirements and approved standards on an ongoing basis
- To ensure senior management knowledge and understanding remains current, through regular management meetings and management reviews

6 BARRIER MANAGEMENT

Exceed implement systems to ensure that potential major hazards are identified, assessed and evaluated systematically, and that suitable, reliable barriers are available to prevent and/or mitigate. , Exceed will ensure that no single failure of a containment barrier can lead to a Major Accident (MA). This is accomplished, through the consistent application of the Well Execution Processes (WEP), Well Integrity Procedure, Decommissioning Design and Execution Process (DDEP) and QHSE Management System including:

- Designing Wells and operational planning in compliance with internal and external requirements
- Ensuring sufficient barriers are in place in accordance with the Exceed Barrier Policy
- Undergo Independent Well Examination
- Identifying all operational and QHSE risks
- Identifying and assessing MAH Risks
- Establishing suitable control measures to eliminate or reduce MAHs to ALARP
- Ensure the Installation Operators and key service providers have effective QHSE management systems in place and that SECEs meet the required performance standards, through the Rig acceptance process and the auditing of safety critical service providers
- Ensure interface arrangements are documented and clearly understood through close cooperation with the Installation Operator and service companies
- Ensure Exceed Management of Change procedures are followed where there is any change to the Well plan or programme
- Employees are aware of their responsibilities for the operation and maintenance of SECE's

- An operational risk assessment is carried out when a SECE or barrier is degraded and compensating measures put in place, or operations adjusted, accordingly

7 COMPETENCE

Exceed recognises that competence assurance is a key component in the management of major accident hazards. Consequently, Exceed will ensure that personnel are capable, competent and resourced to fulfil defined roles and responsibilities and carry out the tasks assigned to them, in a way which delivers Exceed's QHSE Values, in line with relevant industry standards.

Personnel are recruited in accordance, the Exceed Resourcing procedure, with defined role specific competence requirements and are assessed through a formal competency assessment process. Personnel with key roles in managing major accident hazards, will have performance criteria allocated to them. Performance assessments against the criteria are carried out by line managers on an annual basis.

Exceed also expects third party companies that provide personnel to perform safety critical tasks to have suitable policies, procedures, and management controls for their operations. A system of audits and personnel competency reviews is also in place to assure the competency of these key contractor personnel including:

- Drilling Contractor personnel
- Service providers personnel
- Vessel's personnel
- Helicopter personnel

8 COMMUNICATIONS

To meet Exceed's required standards, our risks, targets and objectives and operational requirements will be effectively communicated to all parties through:

- Monthly Office HSE meetings
- Operational Programmes
- Management Systems interface/Bridging Documents
- DWOPS/CWOPS/TWOPS
- Operational and HSE meetings/calls
- Daily Work Instructions, Pre-towers and Toolbox Talks
- Daily and weekly QHSE reporting

Exceed will encourage and promote an open and honest reporting culture and will implement our incident reporting and non-conformance management procedures.

Throughout general office and operational works Exceed will encourage and promote open communication with staff at all levels. This includes both positive and negative feedback and a separate confidential route to raise concerns with senior management, with no fear of reprisal.

9 COLLECTION AND RECORDING OF DATA

Suitable measures have been adopted to promote the reliability of the collection and recording of relevant data and prevent possible manipulation of that data. Procedures within the QHSEMS address data storage, security and back-up, as well as archive and retention period requirements.

10 EMERGENCY RESPONSE CONTINGENCIES

Formal emergency command and control systems will be maintained in accordance with Exceed's Incident and Crisis Management Procedures, which detail the actions to be taken by senior management in the event of a Major Accident.

Exceed will co-operate with the Licence Operator, Installation Operator and key service companies to prepare project specific Emergency Response Plan, bridging between Exceed's incident management procedures, Onshore OPEP and those of the relevant parties. These Emergency Response Plans detail all interfaces, roles and responsibilities and the immediate actions to take in the event of a major accident.

As part of Exceed's emergency preparedness for UK projects a TOOPEP/CIP shall be in place in support of the Exceed Onshore OPEP and in the case of international projects a stand alone OPEP, will be prepared for each operation and will ensure interface arrangements with existing plans are clear and appropriate oil spill response resources are in place prior to operations.

In line with competency requirements, Exceed will ensure that all personnel with emergency response responsibilities are trained and that Emergency Response Plans are exercised regularly.

11 COMPLIANCE

An annual audit programme is in place to monitor compliance with the CMAPP and associated QHSEMS arrangements for managing major accident hazards and identifying continuous improvement opportunities. This programme is generated and agreed by senior management as part of the annual management review. Scheduled audits are carried out in accordance with the programme by the QHSE department and onshore heads of department and are targeted at specific elements of the QHSEMS, including the Well Integrity Management, emergency response and competency assessment, on a rolling basis to ensure all aspects are covered. The programme is risk-based and may be adjusted at any time to reflect the findings of safety and environmental performance monitoring and review activities. Additional project-specific audit schedules are also implemented to ensure operational compliance and assess key service providers, responsible for SECEs.

A system is in place to ensure that the findings from internal and external audits are systematically logged, followed up and closed out in a timely manner, to ensure contious improvement and minimise the risk of a major accident.. Status reports are prepared and issued to senior management on a regular basis.

As part of the maintenance of the Exceed Management Systems, QHSE performance is reviewed on a monthly basis and a review of the effectiveness of the Management System and this CMAPP will be carried out, by Senior Management on an annual basis and immediately following any potential major accident, to look to improve the system and performance on a continuous basis. As a critical document within the Management System this CMAPP will be updated every three years as a minimum.



Ian Mills, Managing Director

21st April 2025



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EXCEED-PS-CP-004 - Corporate Major Accident Prevention Policy Statement rev5

Final Audit Report

2025-04-21

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