



Corporate Major Accident Prevention Policy (CMAPP)

Prax Upstream Ltd (Prax Upstream) recognises its responsibility for appointing competent Tier 1 contractors who have responsibility for controlling the risk of a major accident and for providing them with the means to ensure such risks continue to be reduced to as low as is reasonably practicable. Prax Upstream will ensure they have the appropriate resources and support for them to take the appropriate measures to ensure that such risks continue to be identified, assessed, mitigated, and controlled when undertaking contracted petroleum hydrocarbon activities in Prax Upstream licensed areas.

Our Commitments

Leadership:

- Prax Upstream and our Tier 1 Contractors' Executive and Management (hereafter collectively referred to as Senior Management) ensure that, risks from activities undertaken in Prax Upstream licensed areas, will be reduced to as low as reasonably practicable (ALARP)
- Prevention of major accidents, maintenance of safety and environmental critical elements and protection of the environment are core organisational values, responsibility which starts with the Chief Executive Officer and extends throughout our organisation. We expect the same values to be reflected in the activities and systems of our Tier 1 Contractors. Leaders are responsible for managing major accident hazards and the workforce are responsible for making themselves aware of major accident hazards and actively participating in reducing the associated risks
- Prax Upstream will participate in our Tier 1 contractor management review meetings. We will provide the appropriate resources to ensure the safe operation of the installation. We commit to providing the resources to remedy any SECE barrier weaknesses identified and consider this as a core value of our organisation to support our contractor
- Prax's Upstream Executive will ensure, the CMAPP is kept under review, remains suitable, and is implemented and operated as intended

Command & Control:

- Prax Upstream will maintain a formal command and control structure to ensure CMAPP requirements will continue to be put into effect and implemented. Prax Upstream will ensure that organisational capabilities of our Tier 1 contractors to undertake petroleum hydrocarbon activities on our behalf are kept under review and remain adequately resourced with appropriate competent staff
- Prax Upstream and our Tier 1 Contractors have systems, staff, and resources in place to enable command and control of major accident hazard incidents utilising crisis and emergency management plans. All staff, including senior management, involved in the control of major accident hazards and related incidents are trained, assessed, and deemed competent for their roles



Culture:

- We support the maintenance of a strong safety culture by our Tier 1 contractors through daily and weekly participation and engagement. We understand the demarcation of responsibilities between licensee and Duty Holder
- Prax Upstream supports the arrangements made by our Tier 1 contractor for the development and fostering of a strong safety culture within the workforce. Prax Upstream participates in the Tier 1 contractor safety observation card process and commits to continuing to reward the quality of safety interventions undertaken, through payment into the welfare fund, ensuring a high likelihood of continuous safe operations
- Senior management takes a proactive role in promoting and encouraging a strong safety culture through:
 - regular offshore management visits during operations
 - proactive participation in regular client contractor operational meetings to ensure alignment on priorities and objectives
 - provide feedback on safety performance, audits, and inspections
 - encouraging and rewarding reporting of accidents and near-misses
 - visible commitment to tripartite consultations and actions arising from them

Competency:

- We operate an effective management system to ensure the competency of personnel in key roles performing crisis management and emergency response roles
- We regularly perform emergency response drills and exercises to maintain the competency of our staff to respond to emergencies
- We appoint competent Tier 1 Contractors (Duty Holders) to manage our Major Accident risks whilst undertaking Prax Upstream petroleum hydrocarbon activities. We have assurance processes in place to evaluate and confirm their continued organizational capabilities for safe operations
- We ensure our appointed Duty Holder and Well Operator has an effective verification and well examination scheme in place where an independent competent person and well examiner is appointed to undertake appropriate verification and well examination activities

Safety & Environmental management systems:

- We ensure appropriate resources are provided to our appointed Tier 1 contractors to maintain the functionality, availability, reliability and survivability requirements of all safety and environmental-critical elements against their performance standards, to achieve the required level of safety and environmental integrity
- Provide appropriate resources to ensure as far as reasonably practicable that there is no unplanned escape of hazardous substances from pipelines, vessels and systems intended for their safe confinement
- We commit to providing our Tier 1 contractors with appropriate resources to ensure reliable collection and secure store of technical data, which can be used for historical analysis and prevent unauthorised manipulation of relevant data



- We commit to undertaking Reg 5 assurance audits of our Tier 1 contractors to ensure their compliance with all relevant statutory provisions. Where shortfalls are identified, action plans will be implemented to address any shortfalls found
- We encourage participation by our Tier 1 Contractors to conduct tripartite discussions (between the competent authority, Duty Holders, and workers' representatives) relating to the management of major accident hazards, implementing appropriate actions arising from these discussions
- When undertaking activities comprising simultaneously or combined operations Prax Upstream commits to ensuring appropriate management system interface documents and emergency response bridging documents are put in place, to clearly define boundaries, roles, and responsibilities
- We expect our Tier 1 contractors to undertake incident investigations and reporting on all accidents and incidents. Investigations shall provide root and underlying causes to avoid or prevent similar incidents occurring in the future, including near misses

Audit & Review:

- We undertake an annual review and audit programme to address:
 - compliance with our Health & Safety and Environmental Policies and this CMAPP
 - compliance with regulatory requirements
 - compliance with our health, safety, and environmental management system
 - organisational capabilities
 - management of major accident hazards
- Audit frequency is commensurate with the hazards, risks and environmental impacts of Hurricane's business activities. The audit programme provides assurance to our senior management that our Tier 1 contractors continue to effectively manage major accident hazard risks

This policy applies to all Prax Upstream personnel.

Alessandro Agostini

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