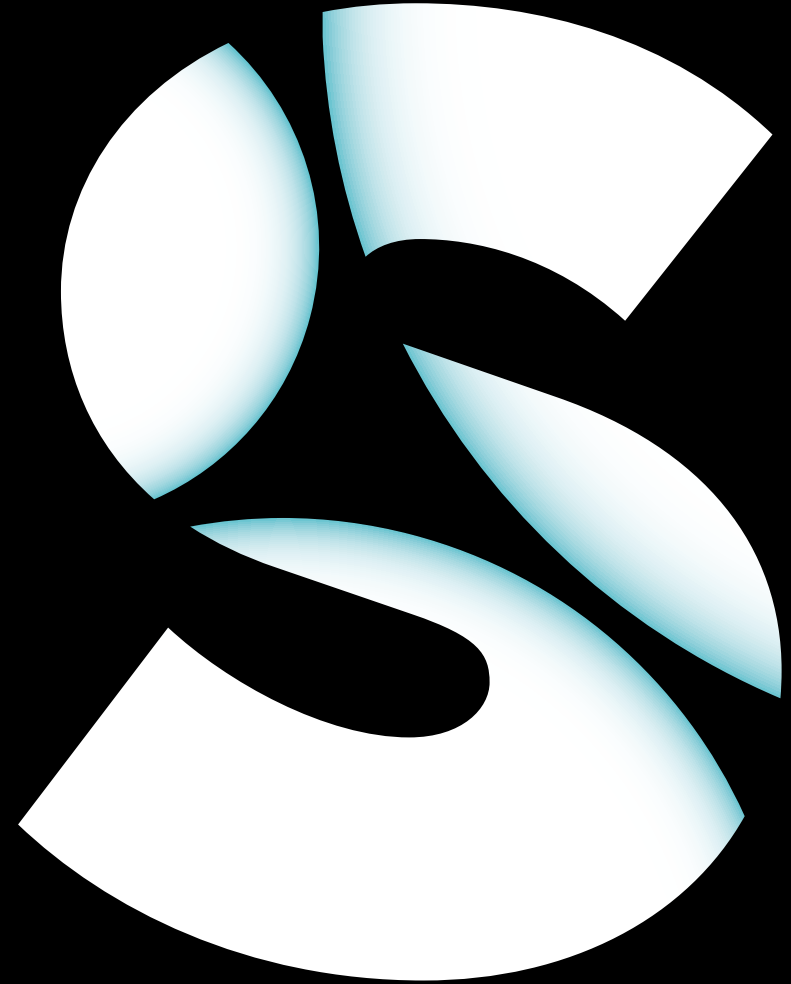


Your guide to how we manage health, safety,
environmental and security risks

HSES EXPECTATIONS



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FOREWORD

At Spirit Energy all our activities should be planned and executed in line with our core HSES expectations. This document describes these expectations for you to ensure we are safe, compliant and efficient.

These overarching expectations work with our policies and values to direct our management system. They ensure that we operate our business in accordance with external and internal requirements and as expected by our stakeholders.

By defining the boundaries through these clear expectations, everyone working here will be able to focus their activities to continually improve our health and safety performance, minimizing our impact on the world around us.

The expectations are to be shared with everyone we work with including contractors and relevant stakeholders. By doing this we will embed our beliefs in HSE through our entire workforce and drive improvement in all areas of our business. Our expectations of how you should behave and interact will further empower you to intervene where you feel they are not being met.

Chris Cox
CEO, Spirit Energy



CONTENTS

1	Element 1 Leadership and Behaviours – Page 5	7	Element 7 Process Safety – Page 15	13	Element 13 Monitoring and Assurance – Page 25
2	Element 2 Performance Improvement and Planning – Page 7	8	Element 8 Control of Work – Page 17	14	Element 14 Continual Improvement – Page 27
3	Element 3 Training and Capability – Page 9	9	Element 9 Health and Industrial Hygiene – Page 19		
4	Element 4 Communication – Page 10	10	Element 10 Environment – Page 21		
5	Element 5 Risk Management – Page 11	11	Element 11 Contractor and Supply Chain Management – Page 23		
6	Element 6 Management of Change – Page 13	12	Element 12 Security and Business Continuity – Page 24		

INTRODUCTION

The Spirit Energy HSES policy is put into practice through the implementation of a management system.

Our HSES management system consists of 14 elements. Each element contains a number of underlying expectations which define how we manage health, safety, environmental and security risks

1. Leadership and Behaviours
2. Performance Improvement and Planning
3. Training and Capability
4. Communication
5. Risk Management
6. Management of Change
7. Process Safety
8. Control of Work
9. Health and Industrial Hygiene
10. Environment
11. Contractor and Supply Chain Management
12. Security and Business Continuity
13. Monitoring and Assurance
14. Continual Improvement

ELEMENT 1

LEADERSHIP AND BEHAVIOURS

1

1.1 Our leaders build and maintain a strong HSES culture by:

- Role modelling exemplary behaviours, and taking accountability for HSES performance;
- Communicating effectively with our people, engaging them in incident free discussions and processes to prevent incidents;
- Ensuring adequate resources (people, plant and equipment, and process) are available to maintain compliance with our HSES management systems;
- Assigning capable people to roles;
- Recognising our people who demonstrate outstanding commitment to our values with respect to HSES.

1.2 Our people demonstrate proactive HSES behaviours by:

- Understanding what is expected of them to ensure a healthy, safe and secure workplace is maintained, and that unwanted environmental impacts are prevented;
- Contributing to the evaluation of risk and the development of effective HSES controls;
- Being open to different ways of working to improve theirs or others health, safety and/or security; and/or protect the environment;
- Believing their inputs to HSES have a positive impact on themselves and others;
- Being alert to changing conditions with regards to health, safety, environmental and/or security, and responding accordingly.

ELEMENT 2

PERFORMANCE IMPROVEMENT AND PLANNING

2

2.1 Leading and lagging HSES objectives, measurable targets and programmes are established (at least annually) to realise continual improvement in performance, through routine business activity planning.

2.2 HSES performance data (including results from incidents, assurance activities and external benchmarks) is routinely collected, reviewed at all organisational levels, and acted on; minimising risk and driving continual improvement to create the environment for an incident free workplace.

ELEMENT 3 TRAINING AND CAPABILITY

3

- 3.1** Competency requirements (including training, qualifications and experience) are determined for each job/activity that can affect HSES performance, delivery of objectives or compliance obligations.
- 3.2** Training needs are identified, reviewed periodically, and assigned to individuals. Training requirements are communicated to people.
- 3.3** People undertaking high risk tasks and/or activities subject to authorisation, permits, consents or licenses receive periodic refresher training.
- 3.4** People complete all assigned training promptly and prior to expiry of any job required training; training and competency records are maintained.

ELEMENT 4 COMMUNICATION

4

- 4.1** Key external and internal stakeholders and interested party's needs are identified and defined.
- 4.2** We consult and collaborate on matters relating to HSES through organised HSES committees, Safety Representatives, and worker's councils.
- 4.3** HSES objectives, targets and performance are communicated internally and externally in a transparent and open manner; verifiable HSES performance data is published and communicated both internally and externally.
- 4.4** Confidential information in both physical and electronic form is protected at an individual, asset and business level.

ELEMENT 5

RISK MANAGEMENT

5.1 All HSES hazards, threats and opportunities are identified; associated risk and impacts are assessed for all activities, products and services.

5.2 HSES risk assessments and registers are documented, maintained, regularly reviewed (including following an incident or other change in circumstance) and approved by authorised people.

5.3 All identified risks are appropriately controlled through the hierarchy of controls, applied proportionately to the identified risk.

5



ELEMENT 6

MANAGEMENT OF CHANGE

6

6.1 All changes to personnel, equipment, and/or processes are subject to appropriate HSES risk assessment and planning, and approved prior to implementation (like for like changes are excluded).

6.2 During change, implementation plans are monitored for continuing suitability; required modifications assessed and implemented as a matter of urgency.

6.3 Following a change activity, the effectiveness of the change is reviewed and additional adaptations made as appropriate to the outcome of the review.

6.4 Appropriate HSES and reputational due diligence is conducted for all mergers, acquisitions, joint venture opportunities and divestments, to identify and quantify, and as necessary mitigate, potential risks.

6.5 Risk mitigation strategies, integration and divestment plans are prepared, agreed and included in the deal structure prior to final deal approval.

6.6 Delivery of the integration plan is tracked to closure.

ELEMENT 7

PROCESS SAFETY

7

7.1 Assets are designed and constructed for inherent safety and to prevent pollution, taking account of those who may be affected, and considering innovative designs to improve HSES performance.

7.2 Whole life cycle impacts are considered in design to maximise operational safety and efficiency.

7.3 Assets are designed and constructed in accordance with regulatory requirements, recognised codes of practice and technical standards.

7.4 Critical HSES systems, processes, and devices for assets, facilities and equipment (both fixed and temporary) are identified, and their functionality defined and documented.

7.5 Critical spares required to ensure plant and equipment operates safely, and without causing unplanned emissions, are identified defined and documented.

7.6 Inspection and maintenance is conducted in accordance with defined requirements, identified defects are risk assessed, temporary control measures implemented as necessary, and rectified in a timely manner in accordance with the risk they present.

7.7 Process Safety information to support safe operation will be defined, and documented.

ELEMENT 8

CONTROL OF WORK

8

8.1 All personnel are authorised to stop work (their own or a colleagues) where they believe there is a risk to health, safety, the environment, security; or of deviation to HSES requirements.

8.2 Legal and other requirements are identified and documented; changes monitored, addressed and communicated; the impact of new or amended legislation is addressed in a timely manner.

8.3 Effective operational controls are developed with assigned personnel to mitigate and or manage HSES risks, impacts, regulatory and other requirements (identified through risk assessment), and implemented through training, knowledge, experience and documentation of work activities, including those subject to permits, consents or licenses.

8.4 Operational controls consider routine and non-routine operations (start-up - including first time start-up and following outage; shut-down - including emergency shutdown), operational interfaces, and state clear operating limits as appropriate.

8.5 Permits to work are used to control high risk/ hazard and non-routine operations, these must as a minimum capture: known hazards, risk and impact, key controls to mitigate or reduce the risk, roles and responsibilities, and performance criteria.

8.6 Mandatory use personal protective equipment is documented and communicated to all affected personnel through training, risk assessment, operational controls and work place signage.

ELEMENT 9

HEALTH AND INDUSTRIAL HYGIENE

9.1 Health and wellbeing is proactively supported through campaigns and advice, including the provision of occupational health services to ensure that health and wellbeing is proactively managed.

9.2 Health surveillance programmes are defined, documented and delivered where required to ensure that our people's health is not adversely affected through their employment activities.

9.3 Workplace and personal monitoring is undertaken to ensure that exposure to potentially harmful substances is effectively controlled, results are used to inform occupational health and wellbeing requirements.



9

ELEMENT 10

ENVIRONMENT

10

10.1 All environmentally material operations are independently certified to ISO 14001 unless determined through an assessment of risk and impact.

10.2 Where relevant new or acquired operations must be certified to ISO 14001 within 3 years unless otherwise agreed

10.3 Emphasis is placed on mitigating climate change through minimising our impacts and those of suppliers through innovation, technology and cultural change.

10.4 Resource use and waste are appropriately controlled through implementing the waste hierarchy of prevent, reuse, recycle, recover, dispose.

10.5 People are expected to manage their environmental impacts through conservation of energy and other resources, appropriate segregation of waste and preventing spillages and other environmental harm.



ELEMENT 11

CONTRACTOR AND SUPPLY CHAIN MANAGEMENT

11

- 11.1** Suppliers of materials, goods and services are assessed, selected, managed and reviewed on the basis of their ability to meet Spirit Energy HSES requirements.
- 11.2** Contractors are selected on their ability to perform work in accordance with Spirit Energy HSES Standards through a defined risk based evaluation process; approval of contractors is based on defined criteria.
- 11.3** Contracts include HSES performance and monitoring requirements, and any required mitigation plan identified during evaluation; contractor performance is addressed through a formal review process.
- 11.4** Preparation for work activities is undertaken collaboratively to ensure opportunities and objectives are achieved.

ELEMENT 12

SECURITY AND BUSINESS CONTINUITY

12

- 12.1** All Spirit operated assets and locations are required to maintain Business Continuity arrangements.
- 12.2** Potential emergency and crisis scenarios are identified and appropriate mitigation plans documented, communicated, reviewed and tested. Events are managed in accordance with documented plans.
- 12.3** People are expected to protect the security of confidential data and the sites or locations where they work.

ELEMENT 13

MONITORING AND ASSURANCE

13.1 The integrity of critical HSES processes, systems and equipment is assured through routine inspection and/or monitoring, and periodic leadership HSES tours.

13.2 The effectiveness of the HSES management system, including compliance obligations are subject to routine inspection, monitoring and assurance. Requirements are based on risk, and are documented and reviewed.

13.3 Corrective and preventive actions identified through monitoring and assurance activities are recorded and tracked in myHSES.



ELEMENT 14

CONTINUAL IMPROVEMENT

14

14.1 HSES incidents, external regulatory inspections, concerns and observations are reported in a blame free environment and recorded in myHSES.

14.2 Leaders are accountable for investigating HSES incidents to identify root causes and effective corrective and preventive action.

14.3 Incidents, root causes and corrective actions are shared and discussed at appropriate levels across Spirit Energy to facilitate learning and help prevent reoccurrence.

14.4 All HSES related corrective and preventive action is documented and tracked to closure through myHSES.

14.5 Lessons learned from incidents, crisis and exercises are captured and necessary actions taken to drive improvement where required.

14.6 Outcomes from HSES functional assurance activities are shared to facilitate learning and help prevent reoccurrence.

14.7 Good practices are documented and made available across Spirit Energy to facilitate learning and help prevent reoccurrence.

