

Corporate Major Accident Prevention

Policy

Harbour Energy recognises that the operations and activities associated with the installations, wells and pipelines over which it has operational command and control have associated Major Accident Hazards (MAHs). Harbour's MAH management approach is based on understanding risk; implementing effective barriers to control it; and robustly assuring barrier integrity through the life cycle. Harbour will do all that is reasonably practicable to reduce MAH risk to people and the environment.

Harbour leadership is committed to:

- Building and maintaining a strong safety culture with open communication and appropriate MAH focus
- Implementing a robust Health, Safety, Environment & Security Management System (HSES MS) to manage MAH risk during all phases of the asset lifecycle
- Establishing an organisational structure with sufficient resources, competencies and leadership oversight to support effective implementation of the HSES MS

Management System Arrangements

The Harbour HSES MS is aligned with industry codes, standards and good practice for safety and environmental protection, and is regularly reviewed by management to ensure it remains fit for purpose and is continuously improved. HSES MS implementation will be achieved via Policies, Standards and Procedures defining minimum mandatory requirements for:

- Identification of MAH and assessment of MAH risk
- Specification, implementation and life-cycle maintenance and assurance of MAH barriers to prevent, control, mitigate and recover from the effects of potential Major Accident Events (MAEs)
- Competence management
- Contractor management
- Management of technical and organisational changes with potential to affect MAH risk
- Incident reporting, investigation and learning

Organisational Arrangements

Harbour Energy is organised into a corporate function and operational Business Units (BUs) which are responsible for compliance with the Harbour HSES MS and develop local HSES documentation to comply with corporate requirements and local regulatory requirements.

Culture

A strong safety culture will be achieved via leadership engagement with the front-line workforce, open communication, focused MAH awareness training, and global initiatives - including the CEO safety awards, global safety day, 'stop work' authority and embedding process safety fundamentals into our operations.

Reporting and Leadership Oversight

Harbour leadership will be regularly updated on HSES performance, incidents (including high potential near misses), audit outcomes, progress of HSES improvement initiatives and operations involving periods of elevated HSES risk. Communication and authorisation of HSES risk will be escalated, based on risk, to the appropriate management level to ensure suitable oversight and control.

Emergency Response and Crisis Management

Emergency Response and Crisis Management arrangements will be in place to mitigate potential impacts of MAE. Arrangements will comprise a tiered response involving asset, BU and corporate personnel and will be regularly tested via scenario-based exercises, including MAE scenarios, to ensure personnel competence.

HSES Training and Competence

HSES training and competence will be managed at BU level, driven by local operational and regulatory requirements. Personnel selection, role-based training requirements and competence assurance will be managed for critical roles, including activities provided by contracted companies.

Assurance

MAH risk controls will be assured through a risk-based audit programme (comprising three lines of defence, defined by level of independence) with frequency and scope of audits proportionate to risk as informed by previous audit outcomes. Audit outcomes will be communicated to the appropriate level in the organisation, based on risk, and used to drive improvement.

Corporate Authority

Harbour will implement this Policy to manage MAH risk across all global operated activities.

Whilst the corporate authority to make certain decisions is delegated to personnel within the Harbour organisation, the CEO of Harbour Energy retains ultimate accountability for ensuring that this Policy is suitable and effectively implemented.