

# Corporate Major Accident Prevention Policy

This Corporate Major Accident Prevention Policy (CMAPP) applies to all Harbour's operated production installations together with all exploration, appraisal, development, and decommissioning activities worldwide. For the purposes of this CMAPP, all subsidiary companies of Harbour Energy PLC, are referred to as "Harbour".

## Organisational Support

Harbour is committed to establishing an organisational structure with sufficient resources, competencies, open communication, and senior management oversight to support the effective implementation of the Safety and Environmental Management System (SEMS).

## Corporate Authority

Whilst Harbour has delegated corporate authority to make certain decisions to personnel within the Harbour organisation, the Board of Harbour Energy PLC retain ultimate responsibility for ensuring that this CMAPP is suitable, implemented and operating as intended.

## Arrangements

Harbour recognises that the operation and activities associated with the installations, wells and pipelines over which it has operational command and control have the potential to give rise to Major Accident Hazards and is committed to implementing robust controls to systematically identify, evaluate and manage these Major Accident Hazard risks during all phases of the asset lifecycle from design through to construction, operation and ultimately decommissioning, in line with our Business Principle of achieving no harm to people and protecting the environment.

1. Harbour will build and maintain a strong safety culture that will ensure a high likelihood of safe operation and maintenance of plant, processes, and equipment. This will include:
  - Effective inductions to company core values and specific worksite hazards;
  - Hazard Awareness Courses, including specific courses for Major Accident Hazards;
  - Awareness of the Harbour Life Saving Rules;
  - Encouragement of and rewarding the reporting of incidents and near misses; and
  - Effective consultation with the workforce and their representatives on Major Accident Hazards.

2. Management of Major Accident Hazards will be reviewed by:

- Scheduled CEO and senior management reviews of the Safety Environmental Management System (SEMS) and the HSEQ performance of the business utilising published leading and lagging safety and environmental performance indicators;
- The provision of focussed performance data for the Boards, management and the workforce;
- Investigation and analysis of incidents (including accidents and near misses); and
- Scheduled audits.

The frequency of the audits will be of an appropriate extent and intensity commensurate with the associated risks. Significant and high-risk findings will be escalated to the CEO and senior management and actions will be tracked to closure. The audit programme will underpin continuous improvement in the control of Major Accident Hazards.

3. Harbour will encourage safe behaviour by recognising good safety performance through programmes such as:

- Intervention card recognition programme for both offshore and onshore;
- Programmes set out in company and asset annual HSEQ improvement plans to drive continuous improvement in safety performance; and
- Recognition and Reward through the company annual bonus award scheme.

Personal HSEQ performance and the support of others is a key consideration for promotion to supervisory roles.

4. Harbour's HSEQ policies, procedures, capabilities, and goals will be reviewed utilising both external and internal audits undertaken by competent personnel. This CMAPP will also be subject to monitoring arrangements to assure effectiveness and compliance with relevant statutory provisions, the objectives set out by this Policy and the Management System, including the mechanisms for investigating and taking corrective action in the case of incident or non-compliance to ensure that the CMAPP and Harbour's culture and processes remain aligned. The procedures will cover the reporting of major accidents and near misses, particularly those involving failure of protective systems, and their investigation and follow-up including the sharing of any lessons learned.

5. Core to all Harbour's activities is safety and environmental protection. We will not operate if it is unsafe to do so or if there is a major threat to the environment. We will align our management systems to relevant national and international standards to ensure best practice.
6. Incidents will be investigated, root causes established, and actions taken to avoid repeat incidents. Crisis management will involve members of Harbour's leadership team.
7. Competency requirements of key roles performing safety and environmentally critical tasks will be assured by the Harbour competence assurance management system which details necessary training and experience and ensures compliance. Assurance processes are also established to confirm the competence of individuals engaged through contracting companies.
8. Harbour will identify all safety and environmental critical elements (SECEs) and ensure they are maintained to the requisite level to complete their function and achieve desired reliability. They shall also be designed to survive any incident they are controlling/mitigating or fail in a state which achieves the desired objective. All SECEs will have performance standards with defined functionality, availability, reliability, survivability, and interdependence.
9. Major Accident Hazards (MAH) will be managed primarily through prevention. Asset Integrity will be ensured by a thorough risk-based inspection and maintenance programme.
10. Assurance of the health of the barriers in place to prevent or mitigate a Major Accident Event (MAE) shall be carried out regularly. At no time will it be considered appropriate to continue operating if there are insufficient barriers to prevent or mitigate the consequences of a MAE.
11. Harbour will conduct periodic thorough reviews of all safety cases and supporting studies to ensure compliance with company standards and legislation relating to MAH management.
12. Harbour has a Safety Representative and whistle-blower scheme designed to encourage reporting in an anonymous and protected way. Tripartite discussions between Harbour, their employees and contractors, and their Safety Representatives will be held for any changes relating to the management of MAH. Harbour will implement appropriate actions arising from such discussions.
13. Harbour understands that any weakness in cyber security control has the potential to impact MAH barriers. Harbour will identify which barriers may credibly be affected and reduce any impact to an acceptable level.
14. Harbour will maintain systems to prepare, test and review incident and crisis management plans to enable effective command and control of the consequences of any foreseeable MAE. The company and each installation will enact published Incident Response Plans, and resources are made available to manage such incidents. All personnel, including senior management, with a role in the management of a MAE are

trained and provided with scenario-based exercises to maintain competence and confidence in role performance.

15. This policy will be reviewed as required and, as a minimum, at the annual HSEQ management review facilitated by an independent third party and attended by the Harbour CEO, President & Chief Executive Officer Europe, and the Senior Management Team. The CEO has overall responsibility to ensure this CMAPP is suitable, implemented and operated as intended to drive continuous improvement. The CEO reports directly to the Board of Harbour Energy PLC.

**Name** Phil Kirk  
**Title** President & Chief Executive Officer, Europe

**Date** 5<sup>th</sup> February 2021  
Effective at completion

**Name** Linda Cook  
**Title** CEO Harbour Energy Plc

**Date** 01 April 2021