



Environmental Management System

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1.0 General

Angus Energy operates from its 4 sites at Balcombe, Brockham, Lidsey, & Saltfleetby, and its office in London. This manual applies to all Angus Energy operations in the UK.

2.0 Policy

Angus Energy is an Oil & Gas producing company and is committed to ensuring that its sites are operated in a responsible manner so as to comply with environmental legislation and to minimize the environment impact of its operations.

2.1 HSE Policy

Angus Energy plc is a UK independent onshore oil and gas development company. Angus Energy is committed to conducting its business in a safe and responsible manner. Our goal is to manage our operations such that we cause no harm to people, where we minimize our impact on the environment and are a good neighbour in the communities within which we operate.

To achieve this we will:

- Provide visible and effective HSE leadership by ensuring that health and safety is an integral part of the Angus management arrangements.
- Set out clear roles and responsibilities, outlining how the work will be done, profiling the health and safety risks through suitable and sufficient risk assessments.
- Allocating sufficient resources and conduct the necessary training to implement the arrangements.
- Encourage the involvement of all personnel in organizing for health and safety with clear communication providing adequate resources and competent advice. Before commencing any activity, we determine the potential hazards to personnel and the environment, and put in place control measures as necessary.
- Hold our employees and contractors accountable for safe and compliant delivery.
- Communicate openly with stakeholders whether internally or externally, that may be affected by our operations.
- Conduct safety audits to check that arrangements are being implemented, risks are being controlled and that the aims are being achieved.
- Investigate accidents and incidents as part of the health and safety monitoring process.
- Review performance to learn from accidents, errors, experience and other organisations to revisit the arrangements in place and update where necessary.
- Understand the environmental footprint and carbon intensity of our production portfolio and strive for continuous improvement.

Safe operations in all our business activities are a core value. If operational results and safety ever come into conflict, we have a responsibility to choose safety over operational results which will be supported by the organization at the highest level.

2.1.1 Organisation and Responsibilities

The Managing Director is responsible for ensuring Executive Level commitment to continual improvement of HSE management in Angus Energy in the UK.

The HSE team is responsible for co-ordinating Environment, Health, Safety and Energy Management activities across Angus Energy in the UK and for auditing compliance with company policies and guidelines.

Managers are responsible for developing and maintaining Environment, Health, Safety and Energy Management procedures within the policy and guidelines, as appropriate to each location, for the provision of information to customers and the public, and for providing appropriate information, instruction, training and supervision to employees, contractors, and visitors. They are also responsible for ensuring audit and compliance with local procedures.

It is the duty of all employees, contractors, and visitors to take reasonable care of the health and safety of themselves, their fellow workers or others who may be affected by their actions or omissions and to co-operate with Angus Energy plc as an employer to enable them to fulfill its statutory and other obligations. Following on from the above, the particular issues relating to the Angus Energy sites are summarised in the following statement:-

2.1.3 Angus Energy Environmental Policy

Angus Energy is committed to carrying out its operations in a safe and responsible manner that prevents pollution of the environment, and to abide by the guiding principles and objectives of the Companies Initiative.

We will do this by:

- Carefully assessing the environmental impact of all materials, processes and products in order to minimise the risks associated with their use.
- Ensuring that our operations comply with or exceed minimum legal and regulatory requirements as well as approved codes of practice subscribed to.
- Adopting safe work methods and training employees in good working practices and potential risks.
- Managing any risks associated with our products through stewardship programmes involving our customers, suppliers and distributors.
- Developing and maintaining documented systems and procedures which are subject to a formal verification procedure.
- Clearly defining responsibilities, particularly in the case of incidents and emergency situations, and maintaining control measures.
- Providing resources for monitoring and controlling processes so as to reduce actual or potential risk.
- Setting targets and objectives for continual improvement projects.
- Managing and minimising waste products arising from our operations.
- Acting in harmony with the local community and engaging them in dialogue about environmental issues.
- Managing and minimising our consumption of energy and other natural resources.
- Sharing experience with industry colleagues to learn and incorporate best practice into our own activities

This policy statement will be implemented, maintained, and communicated to employees.

It provides the framework within which environmental objectives and targets are set, monitored, and reviewed.

Signed:

Date:

3.0 Planning

3.1 Environmental Aspects

The environmental aspects of our activities which are within our control and over which we have influence include:-

- Handling of hazardous and non-hazardous materials.
- Efficient management of energy.
- Site contamination, emergencies, and security.
- Recycling and reuse.
- Liquid and gaseous emissions.
- Noise and vibration.
- Waste management and minimisation.

The risk associated with each activity is assessed based upon the actual or potential hazard, its frequency of occurrence and the degree of operational control exercised. The risk score for each activity is estimated and the information logged and maintained in the form of an Environmental Aspects and Impacts Register. This process is used to determine those aspects which could have a significant impact on the environment. These in turn are used in deciding suitable improvement objectives and setting appropriate targets. Guidelines and Procedures to identify and control the environmental aspects of the operations on the site are given in the HSE manual.

3.2 Legal and Other Requirements

These are reviewed in accordance with HSE Guidelines. Relevant sections of the acts, regulations and ACOP are available for inspection when required.

3.3 Objectives and Targets

Environmental objectives and targets are established on the basis of the significant impacts identified by carrying Environmental Risk Assessments or from the Aspect and Impact Register. These are normally reviewed annually by the Company site managers to ensure that they comply with site policy.

3.4 Environmental Management Programmes

Improvement programmes will be implemented to ensure that targets are met. These may take the form of:

- A capital expenditure project.
- An improvement team with agreed targets.
- Projects assigned to individuals.

Before changes are made environmental aspects will be considered using the Process Safety and Control Procedures. Any Environmental projects will be documented. Once completed, a copy of the document will be kept by the originator and a second copy will be sent to the Management Representative to be kept on file.

4.0 Implementation and Operation

4.1 Structure and Responsibility

The roles, responsibilities, and authorities for the various personnel on site have been defined as follows	
Managing Director	<ul style="list-style-type: none"> Ensuring Executive Level commitment and providing adequate resources to ensure continual improvement in HSE Management in Angus Energy plc in the UK.
Director of UK Operations	<ul style="list-style-type: none"> Developing, authorising and maintaining the Site Policy in line with the Company Vision and Corporate Guidelines. Ensuring that procedures are developed and maintained in accordance with company Guidelines. Providing information to employees, customers and the public. Providing resources to support implementation and control of the environmental management system. Ensuring audit and compliance with local procedures. All operations on site are carried out in a responsible manner that prevents pollution of the environment and minimises risk. Materials and processes are properly assessed and the best practical environmental options are adopted. Employees are made aware of the importance of environmental issues and provided with appropriate training. Systems and working practices are adopted which ensure compliance with legal and regulatory requirements.
HSE Advisor	<ul style="list-style-type: none"> Ensuring that all matters relating to the environment on site are adequate in meeting legal and statutory requirements. Ensuring that procedures are properly formulated and maintained to meet legal and regulatory requirements. Ensuring that line managers are made fully aware of their responsibilities towards the environment and are advised of any relevant changes to legislation. Ensuring that hazards and potential hazards are identified. Ensuring that risk assessment and management techniques are used to identify and deal with risks. Providing and delivering suitable training material. Reporting on the performance of the environmental management system and recommending improvements to top management.
Site Managers	<ul style="list-style-type: none"> The Site Environmental Policy and relevant Operating Procedures are implemented in the areas for which they are responsible. Personnel are suitably trained and made aware of individual responsibilities. Internal and external auditors are given reasonable access and co-operation. Appropriate resources made available upon reasonable request. Incidents and near misses are reported and controlled and root causes investigated.

4.2 Training, Awareness and Competence

4.2.1 Policy

It is the policy of Angus Energy plc to give information, instruction and training to all employees, to protect their health and safety (and that of others whom they may affect) and enable them to fulfil their responsibilities to protect the environment.

4.2.2 Purpose

The purpose is to ensure that all employees are able to carry out their work safely and protect their health and the environment and to ensure the company complies with the relevant legislation.

4.2.3 Scope

Training needs will be identified both at business and operational level and with the individual. This will involve the development and creation of training plans which will cover induction of the individual to the company, transfers within the company, changes of responsibility or legislation and the qualifications and competencies needed to undertake jobs and tasks safely and with regard to health and environment issues. Training methods will ensure that the benefits of improved personal performance are stressed.

4.3 Communication

Internal and external communications about environmental issues are regarded as essential in reducing risk of environmental incidents and working in harmony with the local community.

4.3.1 Internal

Communication between the various levels and functions of the organisation is effected through a number of different channels:

- The company Virtual Private Network (VPN) is the main vehicle providing access to procedures, general information and records relating to environmental issues.
- Internal training and awareness sessions.
- Bulletin Board in the mess room.

4.3.2 External

Dialogue with external stakeholders is affected in a number of different ways:

- Complaints from the neighbouring community will be received documented and responded to in accordance with procedures.
- Meetings with local Parish Council representatives will be held regularly and a range of environmental issues are discussed.
- Distribution of Group and Site literature on Environmental Matters.

4.4 Environmental Management System

The management system documentation consists of:

4.4.1 Policy

Copies of the policy are signed by the Managing Director and posted in suitable positions.

4.4.2 Environmental Management Systems Manual

- Includes Policy, Organisation and Document Control.
- Makes reference to more detailed operating procedures given in the Procedures Manual.

4.4.3 Procedures

Of which the following form an integral part of the EMS:

- Waste Management.
- Liquid Effluent Discharges.
- Gaseous Emissions.
- Ground Water Protection/Spillage.
- Assessment of Environmental Aspects.
- Resource Management and Control.
- Communications and Community Issues.

Records form part of the controlled documentation.

4.5 Document Control

The control of documents which are an integral part of the EMS is accomplished through the Angus Energy Document Control and Records Procedure CORP-PRO-009.

4.6 Operational Control

Operations and activities associated with identified environmental impacts are controlled by the establishment of carefully planned and documented procedures in line with our policy.

Implementation of procedures commensurate with good working practice is ensured as follows:

- Procedures have been established to cover all situations where their absence could lead to deviations from our Policy and objectives.
- Operating criteria are stated wherever these are relevant and particularly where legal or regulatory limits are in force.
- Communicating procedures to suppliers and contractors.

4.7 Emergency Preparedness and Response

The operations on site have established and will maintain procedures to identify the potential for and respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them.

Procedures will be reviewed and revised where necessary, and in particular, after the occurrence of accidents or emergency situations.

Procedures are tested from time to time using simulated incidents and results reported.

5.0 Checking and Corrective Actions

5.1 Monitoring and Measurement

The key characteristics of the operations and activities that have a significant or potentially significant impact on the environment will be monitored on a regular basis. The records of such measurements will be used as information to track performance to ensure conformance with the pre-set environmental objectives and targets. All monitoring equipment will be calibrated and maintained and records retained in accordance with procedures.

Documented procedures have been established to regularly monitor and measure certain characteristics of site operations in order to assess possible trends and to ensure legal and regulatory limits are not exceeded.

5.2 Corrective and Preventive Actions

5.2.1 Policy

All unplanned, unexpected occurrences which interfere with, or interrupt the orderly progress of work, and which lead or may lead to personal injury, monetary loss, or both, or effect on the environment will be reported.

Where considered necessary, investigation of the cause(s) will be made to allow action to be taken to prevent recurrence and to satisfy Statutory and Company reporting requirements.

The effectiveness of corrective and remedial action taken will be assessed at Management Review.

5.3 Records

Records arise as a result of carrying out the various activities on site. Due to the varying nature of the records generated, it is not possible to write a general procedure covering all situations. Full details relating to the identification, maintenance and disposition of records are given in the relevant procedures.

5.4 Audit

The purpose of the EMS audit is to ensure that:

- The system conforms to planned arrangements.
- Procedures have been properly implemented and maintained.
- Legal and regulatory requirements are met.
- Records are maintained to indicate achievement of predetermined performance.
- Information is provided to enable the necessary action to be taken.
- The effectiveness of corrective action is reviewed by management.

Two types of audits are used:

5.4.1 HSE Site Audits

These are normally carried out every 2-3 years depending on the size and nature of the operation. A report of the various non-conformities or areas for improvement is made to Site Operator who is responsible for taking the necessary action and amending procedures accordingly.

5.4.2 Internal Audit

Internal audit will operate at three levels covering:

- Visual **inspection** of the site and boundaries.
- Compliance with site **operating procedures**.
- The continuing effectiveness of the **system**.

6.0 Management Review

The organisation's top management will, at intervals not greater than 1 year, review the Environmental Management System, to ensure its continuing suitability, adequacy, and effectiveness. The management review process will ensure that the necessary information is collected to allow management to carry out this evaluation. This review will be documented.

The management review will address the possible need for changes to policy, objectives, targets and other elements of the environmental management system, in the light of audit results, changing circumstances and the commitment to continual improvement.