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<b>Pan Orient</b> ENERGY	Document / Rev No:	POE-01-001-Rev 11
Health Safety and Environment MANAGEMENT SYSTEM	Revision Date:	12 June 2023



PAN ORIENT ENERGY (SIAM) LTD.

# CORPORATE HEALTH SAFETY ENVIRONMENT MANAGEMENT SYSTEM

JUNE 2023

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## FOREWORD

Pan Orient Energy (Siam) Ltd. ("The Company") recognises that effective health, safety and environmental management contributes significantly to its long-term business success.

This document sets out The Company's social and environmental management system. It emphasises the systematic approach in the way we manage our business activities and our belief that our performance can always be improved over time. The integration of social responsibility and environmental protection into our day-to-day activities is the key to successful management.

The application and success of this system requires the participation and commitment of management, employees and contractors at all levels.

This policy and management system has the Board's full support but we require your commitment through a personal understanding of this document and full participation in the effective implementation of the system.

It is imperative that everyone involved in the business of The Company familiarise themselves with their roles and responsibilities in this document. Only by total commitment by everyone can we ensure the best possible protection of our personnel, contractors, the public, our assets and the environment.

Signed

(Mr. Shuhaimi Bin Mohd Mokhtar)

General Manager

Date: June 12<sup>th</sup>, 2023

## Area of Application

The policies and associated Safety Management System (SMS) apply to the activities of Pan Orient Energy (Siam) Ltd. in Thailand.

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Production Supervisor	Kam Phaeng Saen	06	
HSE Officer	Kam Phaeng Saen	07	
Production Foreman	Kam Phaeng Saen	08	

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## Safety Management System

Pan Orient Energy (Siam) Ltd.

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#### Organizing:

The effective implementation of the management system requires a clear company organizational structure, with staff at all levels committed to the implementation and having an understanding of all the following requirements to achieve success:

- an explicit organizational structure
- identification of safety critical activities & resultant tasks
- ensuring personnel are competent to carry out assigned tasks
- clearly defined roles, responsibilities and accountabilities
- distinct lines of communication
- effective management and integration of contractors.

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#### Section 1: Introduction

The management of health and safety and the protection of the environment, by industry in Thailand, has evolved along with technological and management change. The Pan Orient Energy Safety Management System (SMS) provides a **structured** approach to the way we manage safety and environmental issues. It identifies individual responsibilities in respect of who does what, when and how against policy, objectives and business activities to ensure the creation, implementation and maintenance of safe systems of work in a safe working environment.

##### 1.1 This Document

The SMS represents the Company's corporate management standards for health, safety and environmental management performance. It includes the underpinning standards and instructions referred to in the document and listed in the Document Management System in Appendix 2. The structure of The Company's SMS documentation is illustrated in Appendix 2.

Implementation of the SMS will result in the health safety and environmental risks arising from the Company's activities, being effectively managed, to ensure that they are reduced to **as low as reasonably practicable (ALARP)**. This will also ensure **compliance** with all the relevant statutory requirements applying to the Company.

The SMS is a controlled document and the custodian is the **General Manager**. It will be reviewed periodically with the assistance of the Operations Manager and EIA & Government Liaison Coordinator.

##### 1.2 Background to Health, Safety and Environment Management

Pan Orient Energy, a Canadian independent Operator, will strive for world class HSE performance at its operations in Thailand. The company's Management Team and Board of Directors all bring with them experience from larger international Operating companies. This experience will be employed at its operations in the creation and maintenance of a fit-for-purpose Safety Management System.

##### 1.3 The Safety Management Model

The safety and environmental management model, based on HSG 65, is illustrated in Figure 1. The aim is not only to provide effective policies and procedures but also to incorporate the necessary management control systems to ensure that they are being applied correctly. Improving performance is achieved by management monitoring and feedback. The **Risk Assessment** process (See Section 4.2) compliments the overall HSE policy.

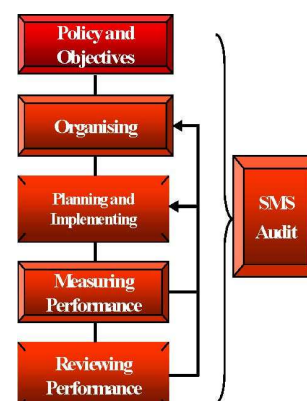
##### 1.4 The Safety Management Principles

###### Policy and Objectives:

The Pan Orient Energy Health, Safety and Environmental Policy (see Section 2.0) sets out The Company's overall statement of policy along with its objectives for health and safety management.

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Figure 1: The (Safety) Management Model



###### Planning and Implementing:

**Planning** for safety and environmental protection involves the identification of Pan Orient Energy's business activities and identifying the associated hazards, risks and control measures required. For the major safety critical activities, the hazards and risks associated with the activity are identified, controls defined, performance standards set and roles, responsibilities and competency standards defined.

**Implementation** takes the results of the planning phase and puts in place the systems, controls, procedures and performance measures to eliminate or control identified hazards and risks. As required by health and safety legislation, wherever possible, risks are eliminated by the use of engineering controls through selection and design of facilities and equipment and through physical control measures. Where risks cannot be eliminated in this ways, then safe systems of work, selection, training and competence of individuals and occupational health measures, including personal protective equipment, are used.

###### Measuring and Reviewing Performance

HSE performance measurement is based on the comparison of actual performance against the standards for each key activity. Performance is also assessed by the analysis of SMS audits, planned inspections and incident statistics. Performance is fed back to management and used as part of the performance review process.

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Management of health and safety is the say-to-day responsibility of managers and supervisors. Their own health and safety commitment and performance will be the major influence on the success in achieving the Company's objectives. This involves them monitoring the standards of performance of hardware, systems and personnel.

The objective of monitoring is not only to identify sub-standard performance but also to determine the underlying causes and implications. This allows for action plans to be developed and through their implementation, the improvement in safety performance.

#### Audit

Auditing is a structured and formal process for the evaluation of the implementation and effectiveness of the overall SMS against the laid down objectives, goals and performance standards.

Audit is an independent review of the SMS, including each of the key elements. The auditor assesses how the system complies with Pan Orient Energy's requirements, and compares the SMS with accepted industry standards.

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## Section 2: Pan Orient Energy Health, Safety and Environmental Policy & Objectives

The Company is committed to protecting the safety of everybody involved with our activities, the people who come into contact with our operations and the physical and natural environments in which we work. We aspire to high standards of practice through a process of continuous improvement and the adoption of international codes and standards where practicable.

To meet this commitment we will implement management systems in our operations that accord with the requirements of our health, safety and environmental standards and strive to:

- Ensure that our operations comply with applicable health, safety and environmental laws and regulations.
- Implement controls to protect all personnel involved in our activities, to prevent pollution and protect biodiversity.
- Provide health, safety and environmental training to our employees and actively promote awareness of health, safety and environmental issues.
- Ensure that contractors are aware of our policies and standards and where necessary, work with our contractors to raise their standards to meet them.
- Foster a culture where accidents, incidents and near misses are reported and investigated and the lessons learned are shared throughout the organization.
- Monitor our performance and conduct regular audits to ensure our controls are effective and that our health, safety and environmental aspirations are being achieved.
- Set objectives and targets for improving health, safety and environmental performance and monitor.
- Ensure that a high priority is placed on emergency preparedness.
- Consult with and respond to the concerns of other stakeholders on our health, safety and environmental performance.

Responsibility for compliance with Pan Orient's HSE policy and standards lies with the Directors, Managers and the Staff.

Successful HSE performance requires commitment from all our employees and it is a requirement that every employee and contractor acts responsibly in preventing, injury to themselves and others, or damage to equipment and the environment.

Signed Date: June 12<sup>th</sup>, 2023



Mr. Shuhaimi Bin Mohd Mokhtar  
General Manager - Pan Orient Energy (Siam) Ltd.

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## Section 3: Organization and Responsibilities:

### 3.1 Management Structure and Organization Chart

The effective implementation of the HSE Management System requires a clear company organizational structure, with staff at all levels understanding their respective roles and lines of communication together with their commitment to its implementation.

The continuing success of the Company and its subsequent growth has called for reorganization, as shown in Figure 2.

#### 3.1.1 Support Team

The Support Team will provide support and services to the Management Team and are headed by the:

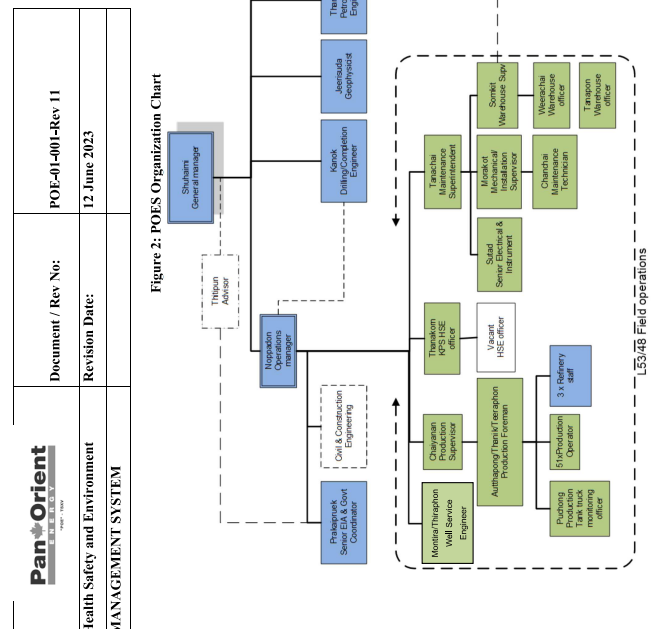
- Financial & Accounting Manager;
- Land/CR/Legal Officer;
- EIA & Government Liaison Coordinator;
- Inventory/Supply chain Engineer;
- Well Engineer
- Geologist; and
- Admin Officer.

#### 3.1.2 Management Team


The Management Team is headed by the Operations Manager and made up of the:

- Operations Manager;
- Field Operation Engineer
- Production Supervisor
- Production foreman;
- Production operator;
- HSE Officers; and etc.

The Operations Manager are assigned respective fields based on the Production Licenses, Well services and Refinery. They have total responsibility for all operations relative to HSE, as well as coordination with the Support Team to supply their respective services to the Asset. In addition, any other key activities within the Asset including exploration (seismic, site construction and drilling) and production (testing, facilities installations, crude oil production and transportation) comes under their jurisdiction with regards to HSE.





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### 3.2 Personnel Responsibilities

Each employee within the Company has a role to play with regards to health, safety and environment. Personnel at all levels are required to understand their respective roles and responsibilities within the HSE Management System and be committed to implementation of this system as specified in this document.

#### 3.2.1 Senior Management

##### Corporation Board of Directors

The Board of Directors has ultimate responsibility for the performance of the Company. They appoint the General Manager who delegates health safety and environmental responsibilities to the line managers. The Company's Chief Executive Officer and Board of Directors are responsible for providing direction and guidance for all business activities and for safeguarding and communicating Company's principles and policy on HSE.

##### Chief Executive Officer

The Chief Executive Officer is responsible for establishing the Company's policy on health, safety and protection of the environment and for providing the resources to put that policy into effect.

##### General Manager


The General Manager is in charge of developing the organization and controls to achieve the corporate objectives and to ensure that all activities under his control are conducted in compliance with the relevant statutory provisions. The General Manager is also responsible for ensuring that the necessary resources are provided and that appropriate actions are taken to effectively implement and maintain the requirements of the HSE Management System.

##### Operations Manager

The Operations Manager oversees the Management Team and reports to the General Manager. He is responsible for upholding the implementation of the HSE procedures and delegating responsibility to engineers and HSE Officer ensuring they are competent and capable of carrying out their work to the required standard.

The Operations Manager's primary role is to:

- Account for production, sales and the proper disposal of all waste fluids streams (gas and water), as required by local regulations.
- Motivate staff, promote their growth and fully participate in the career planning and competence development process including HSE training;
- Ensure appropriate management controls and processes for operations activities (including HSE) are established and deployed in an effective and efficient manner and regularly appraised in order to achieve objectives and reach targets.
- Develop and implement HAZOPs plans;
- Comply with Thai Regulations and other relevant industry standards.

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- Supervising all subordinates and contractors in meeting HSE targets as specified by HSE Officer;
- Ensuring all possible precautions are taken to prevent incidents from happening or escalating and scheduling activities in such a way that no conflicting or potentially hazardous situations arise;
- In coordination with the HSE Officer, performing frequent site checks on processes, equipment, plant working conditions and safety standards.
- Act as emergency team leaders;
- Reporting all incidents, accident or spills immediately to Operations Manager and HSE Officer.

##### Production Operator/Helper

The Production Operator/Helper is the delegated person to check and control the on-site Permits to Work system and ensure that safe job executions. He reports to the Senior Production Shift Supervisor and shares the same HSE responsibilities.


The Production Operator/Helper is a member of the emergency response team (ERT) / on scene commander in case of an emergency. His roles also include:

- Monitoring of chemical injection operations and performance. Ensuring relevant safety precautions are taken with regard to chemical handling, storage and disposal.
- Maintaining an awareness of HSE issues at all times and immediately reporting any unsafe or unhealthy acts or conditions to his supervisor, if it is not possible to take action himself.
- Maintaining cleanliness and housekeeping at all times;
- Reporting all incident/accident/spills immediately to his field foreman or shift supervisor.

##### Refinery Operator

The Refinery Operator acts as a company representative, supervising crude oil loading at the refinery. He is responsible for ensuring all activities are carried out safely and in an environmentally acceptable way and that the Company's HSE policy is cascaded down to contractors. He is also tasked with:

- Ensuring competent staff operates the facilities and develops skills where necessary. Acting as mentor and "on the job" trainer for staff under control. Assisting in developing staff competency level.
- Improving safety awareness among staff;
- Assuming on-site responsibility in case of an emergency and initiate all required actions.
- Follow up on crude oil loading & HSE procedures at the refinery and ensure HSE regulations are adhered to;
- Maintain an awareness of safety with the road tanker drivers and immediately report any unsafe act or conditions to his supervisor, if it is not possible to take action himself;
- Reporting all incident/accident/spills immediately to his supervisor.

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#### 3.2.2 Management Team

##### Field Operation Engineer

Field Operation Engineer has total responsibility for all HSE issues and coordinating with the Support Team to supply their respective services to all Assets and is responsible for supervising all activities which may pose a risk to health, safety and environment to ensure they are completed in a safe manner without damage to the environment by:

- In coordination with the Operations Manager and HSE Officer, performing frequent site checks on processes, equipment, rig working conditions and HSE standards.
- The supervision of contractors in applying the required procedures for safe operations with regards to all drilling activities especially blowout prevention; handling and storage of hazardous substances such as chemicals, radio-active sources and disposal of hazardous waste.
- Perform regular safety drills to ensure emergency preparedness.
- Responsibility in case of an emergency and initiate all required actions in accordance to the emergency response procedures.
- Ensuring all subordinates follow HSE procedures at all time;
- Act as the focal point of liaison between Federal H&S Manager to ensure all operational requirements are met and carried out in accordance to the HSMS;
- Ensuring the safety and welfare of field staff employees, contractors and all visitors to the Asset;
- Meeting HSE targets and objectives, as specified by HSE Officer;
- Creation & implementation of field policies and procedures;
- Creation and development of safe working procedures;
- Assuming on-site responsibility in case of an emergency and initiate all required actions.
- Reporting all incidents, accident or spills immediately to General Manager.

##### Inventory Supervisor


Inventory Supervisor's roles with regards to HSE include to:

- Integrate health, safety and environment in the design and specifications of construction and production sites by adopting and adhering to the relevant industry standards, as specified in the appendices of this document and environmental impact assessment (EIA) report;
- Approve the quality of design and engineering prior to construction and installation;
- Perform regular inspections during construction and installation to ensure approved designs are adhered to;
- Perform pre-start-up safety review and inspection of all equipment prior to commissioning;
- Administer preventative maintenance;
- Reporting all incidents, accident or spills immediately to Operations Manager and HSE Officer.

##### Production Supervisor & Production Foreman

The Production Supervisor & Production Foreman are responsible for supervising the field operators and contractors to ensure they are completed in a safe manner and adhered to the Company's HSE policy and procedures without damage to the environment by:

- Cascade the HSE policy and procedures down to subordinates and contractors to improve HSE awareness among staff and contractors;
- Ensuring all subordinates and contractors follow HSE procedures at all time;

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##### Crude Loading and Tanker Coordinator

- Report spills immediately to his supervisor;
- Maintain safety awareness with the tanker truck drivers and take action and immediately report any unsafe acts to his supervisor.
- Carry out & minute of HSE meetings for tanker trucks on a monthly basis

##### HSE Officers

HSE officers assist in managing the overall HSE assessment process and provide specialist HSE services including to:


- Perform regular onsite audit inspections all operational phases (site construction, drilling, testing and production) to monitor compliance and report results to the Operations Manager;
- Arrangement and coordination of site inspection and audits and timely assessment of risks to HSE and implementation of measures identified prevent or reduce further occurrences;
- Participate and conduct HAZOP, root cause analysis (RCA) studies / corrective action plans and execute as required, ensuring all non-compliance issues are addressed and closed out;
- Perform regular inspections of contractor's equipment;
- Educate and train staff within the Asset, using toolbox talks etc;
- Investigation of all reported incidents;
- Conduct the dust control and road cleaning program;
- Support road show and community relation activities;
- Reporting and documentation of all HSE matters.
- Be a part of the emergency response team (ERT).

#### 3.2.3 Support Team

##### Warehouse Supervisor

The warehouse supervisor assisted by the Field operation Engineer is accountable for the site procurement and community relation. In coordination with the Land/CR/Legal Officer, their health and safety responsibilities include:

- Ensuring all subordinates follow HSE procedures at all time;
- Ensuring all emergency contact numbers of the emergency response team and local emergency services are updated and available to all staff;
- Coordinating with HSE Officer to distribute health, safety and environment information to staff;
- Coordinating with HSE Officer with regards to health, safety and environment in the office, staff accommodation and for the Company's vehicles;
- Coordinating with HSE Officer for PPE equipment;
- Providing specific health and safety training to personnel so that they are competent and capable of carrying out their work to the required standard and as required by regulations;
- Provision and supervision of all security issues;
- Reporting all incidents, accident or spills immediately to Operations Manager and HSE Officer.
- Conducting the road show activity for the villagers in the areas of sensitive receptors;

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- Recording all complaints in the log sheet and coordinating with relevant parties for clarification and reducing any conflicts between the company and nearby communities.

#### EIA & Government Liaison Coordinator

The EIA & Government Liaison Coordinator and HSE Officer are accountable for establishing a good environment, safe and healthy workplace by monitoring the standards, communications, training, processes and systems to ensure the HSE Management System is effectively implemented and that performance levels are aligned with the Company's HSE targets and objectives. The key enabling functions to achieve this are:

- Provision and promotion of suitable information concerning HSE policies and practices;
- Establishing HSE objectives and targets and monitoring performance;
- Ensuring all activities are performed in accordance with the HSE Management System meeting all the goals, standards and as required by law;
- Preparation and consultation with personnel on improving HSE standards, standing instructions and safe operating procedures;
- Prevention, precautions and adequate control against exposure to hazardous substances and danger from flammable, explosive, electrical, noise, radiation and equipment handling risks;
- Provision and supervision of emergency exercises, first-aid facilities, safety signs, relevant protective clothing and equipment, and incident reporting to the relevant authorities;
- Liaison and consultation with organizations and relevant authorities for assistance and cooperation in HSE issues.
- Participation and development of HAZOPs / corrective action plans and ensuring follow up and close out.

#### All Employees

All employees are encouraged to actively engage and participate with line management and supervisors in the implementation of and compliance to the requirements of the HSE Management System.

### 3.3 Employee Recruitment, Selection and Induction

#### Recruitment and Selection

The Company has procedures in place to ensure that all approved vacancies are filled by individuals with the appropriate qualifications and experience to fulfill the requirements of the position. All recruitment and selection is undertaken in accordance with the relevant legislation.

##### The management goals for recruitment and selection are to:


- conduct recruitment and selection in line with good practice and legislation;
- identify the best candidate for the position using job description, competence profile, and structured interview.

#### Induction

The company recognizes that communication and dissemination of information, rules and regulations is essential for any new employee. This is a staged process, as follows:

- initial induction with personnel which includes HSE awareness, fire, first aid and evacuation

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#### Management responsibility for HSE Training:

- Operations Manager

### 3.5 Employee Performance Appraisal

The Company has a formal performance appraisal process which is conducted on an annual basis. The immediate supervisor reviews the past performance of the employee against previously set objectives and determines the objectives for the forthcoming year. Individual career development and direction is discussed, as is training and development needs. From this, an individual training and development plan is developed, which is also linked to any competence development needs identified during the performance appraisal review.

#### Management goals for performance appraisal:

- to give a constructive overview of achievement over past year;
- to evaluate effectiveness of the individual's performance against their set objectives;
- to review training undertaken over past year and its effectiveness;
- to identify future training and development needs;
- to set objectives for the forthcoming year;
- to discuss individual's future career development and aspirations;
- to record performance and outcome of performance appraisal.

#### Management performance standard for performance appraisal:

- completion of annual performance assessments for all employees.

#### Management responsibility for performance appraisal:

- General Manager / Operations Manager

### 3.6 Employee Competence Assurance


The effective management of health, safety and environmental risk relies on the competence of all the personnel engaged in operations. Competence is defined by an employee or a contractor having suitable skills, experience and training in order for them to carry out their responsibilities safely and effectively. This requires not only professional, technical and personal skills but also the necessary HS&E awareness to ensure that the role is carried out without endangering the individual, others, property or the environment.

Competence assurance is an ongoing process and begins prior to recruitment and selection and continues throughout an individual's employment with the Company. It comprises of a number of elements:

- the individual's job description which defines the activities to be carried out;
- the individual's competence profile, i.e. competence levels required to conduct those activities and responsibilities against the performance standards required by the Company;
- the individual's competence assessment, i.e. validation of skills, on-the-job assessment, performance appraisal, signed off by the line manager;
- the development and maintenance of an individual's competence, i.e. training, re-validation, updating.

#### Management goals for competency for employees and contractors

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- procedures as well as day-to-day personnel issues; This will be oriented by HSE Officer.
- departmental induction by line management which includes pre-job discussions.

#### The management goals for induction are to:

- provide sufficient information specific to the job so that the individual is competent to perform the work in a safe and efficient manner;
- provide every new employee with general information on the Company;
- provide every employee with all necessary health and safety information including a general awareness of the Safety Management System.

#### Management performance standards for recruitment and selection:

- objective evidence that recruitment and selection processes and procedures have been successful;
- record of the induction, endorsed by the employee;
- personnel are fully aware of the information provided during inductions.

#### Management responsibility for meeting performance standards:

- General Manager/ Operations Manager

### 3.4 Employee Training and Development

The company recognizes the importance of the training and development of its entire staff in order to maintain and improve standards of performance and to maximize individual employee development.

#### Management goals for training and development:

- to train and develop employees, as necessary, against the requirements identified by performance appraisal and competence assessment and maximize their contribution to the Company;
- to ensure that employees maintain up-to-date knowledge of their specialist discipline and are aware of technological changes/advancements in their particular area.

#### Specific Health, Safety and Environmental Training


Specific HSE training is conducted as necessary and is specifically targeted to the requirements of the employee and his job. Specific HSE training includes, but is not limited to:

- specialized fire and first-aid training;
- health, safety and environmental legislative training;
- training in the specific elements of the Safety Management System
- Instructors of training courses will be both recognized private organization and government officers.
- Training requirement for concerned will be provided per POE-02-031.

#### Management performance standards for HSE training:

- identification of competence development requirements for all employees and the relevant training to address these requirements;
- evidence that training and development has been completed by individuals;
- maintenance of records for training & development.

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- the clear understanding by all employees of the work to be carried out using their job descriptions, which include accountability to others, responsibility to others, main tasks, HSE responsibilities, qualifications and experience, and personal attributes;
- developing levels of competence against each task and responsibility within the job description;
- conducting competence assessment on a regular basis, using on-the-job assessment, satisfactory completion of training, performance appraisal;
- ensuring that each employee is involved throughout the competence assurance process and understands and resolves any areas of competence shortfall;
- developing an individual training and development plan linked to competence development needs, including on-the-job training, professional training schemes, training using the procedures and equipment supplier training;
- maintaining the required competence level by re-validation, updating skills to take account of advancing technologies, refresher training and exercises/drills, as appropriate;
- maintaining a record of the competence assurance process for each individual and documenting all findings.

#### Management performance standards for competence:

- implementation of job descriptions and required competence levels;
- documentation confirming competence level achievement;
- documentation up to date and signed off by line management.

#### Management responsibility for competency for employees and contractors:

- General Manager / Operations Manager

For The Company's employees the respective line manager is accountable for their development and training to ensure that they are competent before assigning them responsibilities.

### 3.7 Management of Contractors


The Company utilizes specialist contractors and materials suppliers to carry out certain operations and for the supply of equipment. The processes of hiring and managing contractors to ensure that The Company's HSE policy is complied with will depend on the tasks to be performed and the hazards posed. Safety critical tasks and equipment will be targeted as being crucial for management to address Pan Orient Energy's contract procedures will be followed for contract placement.

The relevant manager responsible for hiring the contractor will assess whether the tasks, or equipment, being tendered for, are safety critical. If they are assessed as such, then the tender document will insist on the following management goals being achieved:

#### The management goals for contractor management are to:

- assess whether the contractor has a Safety Management System that complies with The Management of Health and Safety Regulations and is capable of being interfaced with the Company SMS;
- assess the contractor's safety management system for standards that are commensurate with the level of risk to be imported;

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- assess the level of contractor compliance with their own procedures;
- assess the commitment of the contractor management to HS&E; according to "Contractor Safety" procedure POE-02-032.
- approve / qualify contractors meeting the required standards;
- determine the on-going performance of the contractor;
- provide a database of information on contracting companies for future use.

### 3.8 Procurement of Equipment and Services from Contractors and Suppliers

As part of the SMS policy and procedures on procurement, The Company only purchases approved equipment from qualified suppliers. The requisitioning manager is responsible for the relevant technical specifications and information, safety and quality assurance requirements, delivery programme and vendor pre-qualification.

The management goals for the procurement of equipment and materials are to:

- ensure that The Company safety procedures Contractor Safety (POE-02-032) are complied with throughout the procurement process;
- purchase only approved equipment from qualified suppliers against specification and performance standards.

**Management performance standards for the management of contractors and procurement of equipment:**

- standards and procedures for selecting and monitoring contractors are in place and that they are being utilized effectively;
- effective and suitable arrangements are used for controlling purchasing of equipment and materials.

**Management responsibility for the management of contractors and procurement of equipment:**

- Operations Manager/ Inventory/Warehouse Supervisor

### 3.9 Workforce Involvement and Communication

(See Section 4.3 for detail on managing HSE communication.)


#### Involvement in Procedures and Work Instructions

Involving the workforce in the development of procedures and work instructions is crucial to their relevance and utilization. Wherever possible, line managers, including supervisors will consult with their colleagues and the Operations Manager, during the preparation of procedures and work instructions.

#### Involvement in Incident Reporting and Investigation

In line with the Company policy and objectives, employees at all levels may be required to be involved in the investigation of incidents per Accident investigation report procedure (POE-02-016). The level of involvement is defined in the investigation procedure but in all cases maximum use will be made of specialist employee knowledge when identifying direct and indirect causes of incidents and determining the actions to prevent recurrence.

#### Involvement in Management Safety Meetings

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See section 4.3 for The Company policy and performance standards for safety meetings.

#### Involvement in Pre-Job Discussions

The objective of these meetings is to ensure that all members of a work team understand the hazards, controls (PTW etc.) procedures, work instructions, are familiar with the work environment, have the correct tools and equipment and are competent to carry out the work.

#### Involvement in SMS Inspections and Audits

The inspections and audits required by the SMS (see Section 5) require the participation of the workforce to demonstrate their understanding of the system. The quality of audit reports relies on accurate feedback from the workforce. It should be recognized as a positive exercise, as the results of these audits provide the basis for performance improvement.

### 3.10 Document Control, Review and Update

#### Maintenance of SMS Documentation


In order to ensure that the content of the SMS is maintained current with regard to legislation, industry standards and company requirements, the SMS documentation is controlled. The Company SMS document structure is shown in Appendix 2 and the master SMS document listing is contained in Appendix 3. The custodian for the SMS overall is, on behalf of the Chief Executive Officer, the General Manager, Operations Manager.

#### Management Goals

- SMS documentation is maintained in accordance with HSE document control procedures; (POE-02-034)
- revisions are originated, reviewed and approved at the appropriate level;
- documentation is issued in a controlled manner;
- the SMS documentation complies with current legislation.

#### Review and Update

- Requests to amend the SMS should be addressed to Operations Manager and will be approved by the Chief Executive Officer and/or General Manager during the annual review of the SMS.

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## Section 4: Planning and Implementation

Planning and implementation of the Safety Management System is integrated into the management of the normal business activities of the Company. The listing of the main risk generating activities, typical of any upstream oil operating company, are summarized below. These activities will be managed by utilizing the controls and standards referred to in the Business Processes Listings contained in Appendix 1. The controls and standards listed there represent the Company's corporate policy for managing the activities and thereby for reducing the risks to as low as reasonably practicable. A number of specific management activities that relate to health, safety and environmental issues are included below the business processes in this section.

### 4.1 Pan Orient Energy Business Processes

#### Managing Seismic Operations

The following summarizes the activities that would be undertaken by the Company in connection with seismic operations:

- prepare for seismic operations;
- execute seismic operations.

#### Managing Exploration, Appraisal and Development Well Operations

The following summarizes the activities that are undertaken by the Company in connection with exploration and appraisal drilling operations:

- well design and planning;
- prepare drilling facilities and worksite;
- well construction and handover (or abandonment);
- management of well equipment and materials;
- selection and management of contractors;
- logistics management;
- environmental and waste management;

#### Managing Facilities Design and Installation


The following summarizes the activities that are undertaken by the Company in connection with the development of existing or new field(s):

- prepare field development plan and a basis for design;
- prepare a field development specification and implementation plan;
- preparation of detailed design;
- procure and control material, equipment and services;
- construct and commission facilities.

#### Managing Production Operations

The following summarizes the activities that are undertaken by The Company in connection with production operations:

- plan and execute field activities;
- manage well performance;

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- manage tanker operations;
- plan and execute inspection and maintenance;
- procure and control materials, equipment and services;
- modify facilities;
- provide health, welfare and emergency services;
- environmental and waste management;
- manage office and warehouse facilities;
- abandonment and decommissioning.

#### Managing Production Well Intervention Operations

- well programme design, planning and execution.

Within each of these business processes there are numerous activities that generate hazard potential and the requirement to manage the risks. These are managed by the introduction of written controls, either generic standards or project-specific procedures. All of the controls are controlled documents under the SMS (see Appendix 3 for the master listing). The general principles of the risk management process are described in Section 4.2.

### 4.2 Hazard and Risk Management

Pan Orient Energy requires that risk assessments be undertaken to ensure that it complies with any relevant statutory provisions and thereby reduce the risks so far as reasonably practicable.

#### The Risk Management Process

Risk management consists of the following activities:

##### Hazard Identification, Risk Assessment, Control and Mitigation

#### Identifying the Hazards

A hazard is defined as something with the potential to cause harm. The techniques used to identify hazards depend on the nature and complexity of the operation or activity. They could range from observation and recording to the use of specialist techniques such as HAZOP/ HAZID.

#### Assessing the Risk

- Risk is defined as the likelihood that the harm from a particular hazard may occur. The level of risk is dependent on the frequency of exposure to the hazard, the potential severity and the probability that the hazard will be realised.

#### Managing Risk

Eliminating the risk is the preferred option. If risk cannot be eliminated, then reducing the risk to an acceptable level will be achieved through the identification and **implementation** of control measures.

#### Mitigation Measures

In the event of failure to manage risk then contingency plans are developed to minimize loss.

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#### The management goals for risk management are:

- to carry out hazard identification and risk assessments at work sites; by area supervisors/ manager with advising from HS department.
- to ensure hazard identification and risk assessment is carried out by personnel with appropriate training and experience;
- to establish acceptable levels of risk;
- to prioritize the identified hazards by the risks presented;
- to develop achievable action plans for the reduction of risk;
- to measure progress against the action plans;
- to review the assessments when conditions significantly change;
- to develop contingency plans to deal with emergency events.

#### The management performance standards for risk management:

- completion of hazard identification, risk assessment and development of controls for business processes and specific projects/assets;
- evidence of an effective approach to and implementation of controls;
- evidence of hazard identification and risk assessment in the design of new facilities or equipment;
- effective contingency plans.

#### Management responsibility for risk management:

- General Manager/ Operations Manager

### 4.3 HSE Communication

Efficient communication, both up and down the organization, is essential for the SMS and other management systems to function effectively. The communication structure is designed not only for the passage of information but to motivate people through their involvement and understanding. It is recognized that well motivated employees will contribute more towards the overall success of the Company.

#### 4.3.1 Safety Consultation

##### The management goals for safety consultation are:

- to arrange a consultation;
- to provide the information required under regulations.

##### The performance standards for safety meetings are:

- HSE Committee meeting procedure POE-02-034 in placed and functioning effectively;
- information required under regulations is provided to the workforce.

#### 4.3.2 Management Safety Meetings

Safety meetings are essential for assessing HSE performance, for involving the workforce and as a means of expressing management commitment to the safety culture. The following formal meetings will be held. The purposes of the meetings are to review health, safety and environmental performance and to seek improvements.

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#### Site Management Safety Meetings

The site management meetings will be held Bi-monthly at Kam Phaeng Sean, and will follow a structured process chaired by the Operations Manager. The meetings will be minuted and the actions arising will be recorded, with responsibilities for the actions identified. The Operations Manager will collate the actions and assigned responsibilities register.

#### Corporate Safety Meetings

Corporate safety management meetings will be held every 6 months and will be chaired by the **Chief Executive Officer**. The meeting will be minuted and the actions arising will be recorded with responsibilities for the actions identified. The Operations Manager will collate the actions and assigned responsibilities on an action register.

##### The management goals for safety meetings are:

- to review safety performance and assess results;
- to produce and maintain an SMS improvement plan;
- to provide the necessary resources to implement the improvement plan;
- to maintain effective communication with all employees and contractor staff.

##### The performance standards for safety meetings are:

- agenda produced and circulated prior to each meeting;
- minutes produced and circulated within 5 working days;
- action list produced by Operations Manager and updated before next meeting.

##### Management responsibility for safety meeting:

- General Managers/ Operations Manager

### 4.3.3 Worksite Pre-Job Discussions

Effective communication on the worksite involving the entire workforce is a major component of incident prevention. Pre-job discussions should address the work to be undertaken, the identified hazards, precautions and controls. Significant topics or identified problem areas may be the subjects of further discussion especially if there is an impact on company standards or procedures.

##### The management goals for worksite discussion are:

- to ensure a satisfactory level of understanding of the work to be undertaken;
- to ensure that all hazards have been identified and that adequate controls and follow up are in place;
- to ensure that PPE and the equipment are fit for purpose for the work;
- to ensure that the permit to work system is being complied with;
- to ensure that the Emergency duty roster are updated.

##### The performance standards for work site discussions:

- full understanding of the work to be undertaken;
- all hazards have been identified and that adequate controls and follow up are in place;
- PPE and the equipment are fit for purpose for the work;
- the permit to work system is being complied with;

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- Emergency duty roster are updated.

##### Management responsibility for worksite discussion:

- General Manager/ Operations Manager

### 4.3.4 Hazard Reporting by the Workforce

Any hazard perceived by any employee can be raised to the area Operations Manager and HSE Officer. This system provides the workforce with an effective mechanism for communicating to management any hazards or occurrences that are perceived. The Operations Manager will ensure that matters are addressed by the appropriate manager. Valid feedback will always be given to the originator.

##### The management goals for hazard reporting are:

- to provide a credible hazard reporting and communication system;
- to ensure a rapid response to all hazard information.

#### Responsibility for hazard reporting All Employees Responsibility for hazard report collation and dissemination Operations Manager

#### 4.3.5 Safety Alerts and Safety Information

The company communicates important HSE information through the issue of Safety Alerts and by maintaining an up to date library with relevant safety information at its main sites. Safety Alerts are issued by the HSE Safety Officer from information supplied by personnel from any of The Company's locations or from government or trade associations. If applicable, the information may be incorporated into processes, procedures or working instructions, safety board.

##### The management goals for safety alerts and safety information are:

- to communicate critical health and safety information to all relevant personnel and locations;
- to amend company processes and procedures based on the alerts;
- to make available up to date health, safety and environmental information.

##### Management performance standard for safety alerts

- the timely issue and distribution of safety alerts;
- the timely update of safety and environmental information.

##### Management responsibility for Safety alerts and Safety Information: Operations Manager

### 4.4 Occupational Health Standards

#### 4.4.1 Employee Occupational Health Standards

All employees are subject to health surveillance by the Company. The process begins at the employment stage and periodic examinations are carried out at appropriate intervals.

Program of Health Check up per POE-02-018

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- Pre-employment Health Checkup
- Annual Health Check up
- Comply by local laws

##### The management goals for health surveillance are to:

- comply with company and legislative standards;
- maintain a program of periodic medical examinations;
- ensure professional medical attention is available to all company location.
- Maintain First Aid Station with qualify personal and medicine by laws

##### The management performance standards for health surveillance are:

- employees health is monitored and appropriate assistance provided throughout their employment;
- appropriate medical records and results of health monitoring are maintained.

##### Management responsibility for Occupational Health standards:

- Operations Manager

### 4.4.2 Substance Abuse

The potential of substance abuse is recognized by the Company. Management will place the emphasis on initially identifying that a problem exists and then working with the employee to resolve the problem. Continued abuse in the workplace however, will be handled under the disciplinary procedure.

##### The management goals for substance abuse are to:

- actively discourage substance abuse in the workplace;
- proactively identify potential abuse and provide counseling.

##### The management performance standards for substance abuse are:

- the elimination of substance abuse at the workplace.

##### Management responsibility for substance abuse:

- Operations Manager

### 4.4.3 Control of Substances Hazardous to Health

The company is committed to eliminating, or controlling, the risks arising from the use of any substance that presents a health risk to employees. To do this all such substances in use will be identified and the risks arising will be evaluated. Controls will then be put in place to reduce that risk to an acceptable level.

Although The Company provides suitable personal protective equipment per Personal Protective Equipment POE-02-013 for use by employees this is not considered to be the primary control measure. Elimination or substitution with a less harmful substance is the preferred management option.

The Operations Manager is responsible for implementing all the necessary precautions and controls and for ensuring that the product has been assessed and any hazards/risks evaluated.

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#### The management goals are:

- to carry out assessments at all company sites;
- to produce data sheets for all the identified substances;
- to implement controls to reduce the risk to an acceptable level (in order of preference), by:
  - substitution of safer products;
  - personal protective equipment;
  - instructions and pre job briefings prior to use of hazardous substances;
  - hazard identification, risk assessment and implementation of control measures;
- to monitor the effectiveness of the control procedures;
- to provide health hazard, risk and control measures information to employees.

#### Management performance standards

- assessments carried out at all company sites;
- data sheets available for all the identified substances;
- controls are implemented to reduce the risk to an acceptable level;
- employees are aware of the health hazard, risk and control measures.

#### Management responsibility for Control of Substances Hazardous to Health :

- Operations Manager

#### 4.5 Standards and Procedures

Clear, concise, well understood procedures, guidelines and controls are essential to reduce injury to people, damage to plant and equipment and the environment.

For standards and procedures to be effective they must follow a standard format, be developed and updated by the personnel who will eventually use them. They must always be easily accessible and up to date.

Pan Orient Energy management standards and procedures are covered in section 4.1. Document management is covered by Section 3.10

#### 4.6 Equipment Examination

The Company will ensure that examination of certain equipment and operations is carried out by competent persons, as required. The examinations can be carried out by competent persons employed by the Company or by a nominated contractor. The well examiner must be independent of the line management. A separate written scheme for these examinations will be in place for each site and will comply with the relevant regulatory guidance.

#### The management goals for examination are to:

- set up an examination scheme for the equipment or operation;
- ensure that all the appropriate equipment is identified and subject to examination;
- maintain records of examination;
- ensure any reported defects are acted upon.

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#### 4.9 Managing Working Time

All the Company's sites will ensure that the requirements of the Working Time Regulations are complied with by ensuring that staff does not work excessive hours without their agreement.

#### The management goals for managing working time are to:

- To comply with the Working Time Regulations.

#### Performance standards for working time management

- Regulatory compliance achieved.

#### 4.10 Managing First Aid

All company locations will have suitable first aid equipment and facilities available in compliance with the First Aid at Work Regulations.

#### The management first aid goals are to:

- identify and provide sufficient, trained, first-aiders; by comply per Health and Safety Training requirement procedure POE 02-031 as a minimum.
- identify the appropriate first aid equipment and facilities required;
- provide the equipment and facilities;
- maintain first aid equipment and facilities in a safe and efficient condition.

#### First aid provision performance standards

- sufficient, trained, first-aiders provided;
- appropriate first aid equipment and facilities provided;
- equipment and facilities provided;
- first aid equipment and facilities maintained in a safe and efficient condition.

#### Management responsibility for Managing First Aid:

- Operations Manager

#### 4.11 Managing Incident Reporting and Investigation

Incident reporting and investigation positively contribute to the process of accident prevention. Pan Orient Energy management will be involved in the process of investigation, dependent upon the severity or potential severity of the incident, in order to identify the underlying causes and to implement actions to prevent recurrence.

#### Reporting and Investigation Procedure

Employees are required to report all accidents and incidents in which they are involved to their line manager/ supervisor. These include injury to personnel, damage to plant and equipment, harm to the environment and near misses. Accurate and timely reporting is essential to ensure effective follow-up.

Following the initial report, the formal company incident reporting and investigation procedures POE 02-016 are followed.

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#### Management performance standards for examination

- examination schemes in place;
- all the equipment has been identified and is subject to examination;
- records of examination are maintained;
- all defects have been acted upon.

#### Management responsibility for Equipment Examination:

- Operations Manager

#### 4.7 Maintenance System

The Company will ensure that all equipment which presents a risk to employees, other facilities or to the environment is in a safe and efficient condition. The company operates a maintenance system that identifies the level of maintenance that is required, including the frequency and maintains records of all maintenance carried out.

#### The management maintenance goals are to:

- identify which equipment is subject to planned maintenance;
- provide defined maintenance routines for the equipment;
- maintain such equipment in a safe and efficient condition;
- maintain records of all maintenance carried out.

#### Maintenance management performance standards

- all safety critical equipment in a safe and efficient condition;
- up to date records of all equipment requiring maintenance are maintained;
- up to date maintenance routines, including frequencies are available;
- up to date maintenance records are available.

#### Management responsibility for Maintenance Systems:

- Operations Manager

#### 4.8 Permit To Work System

The Company's Permit to Work system must be utilized for risk operations. It provides for a written instruction from the person in charge of the area to the person carrying out the work. The permit to work records where, when and how the work is to be executed, identifies hazards, any additional precautions and the control measures and requires that the site and plant/equipment status be recorded on close out of the work.

#### The management goals for the permit to work system are to:

- provide a level of control for high risk operations;
- ensure all personnel who may be affected by the work are aware and involved;
- monitor compliance with the permit to work system through audit.
- Comply with Work Permit Procedure (POE 02-023).

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Significant accidents and incidents are reviewed at the Management Safety Meetings.

#### The management goals for accident reporting and investigation are to:

- to encourage the reporting of all accidents, incidents and near misses;
- to investigate all reported accidents and incidents at a level commensurate with their potential;
- to develop realistic, achievable recommendations to prevent recurrence;
- to communicate the findings of investigations to all interested parties to prevent recurrence;
- to provide a database of information for performance measurement.

#### The management performance standards for accident reporting and investigation are:

- the timely provision of data on incident occurrence and incident reports;
- the full completion of investigations, determining root causes;
- high quality investigation report;
- follow up recommendations prevent any recurrence.

#### Management responsibility for accident reporting and investigation:

- Operations Manager

#### 4.12 Contingency Planning and Emergency Response

The Company recognizes that even with the implementation of an effective management system there is always the potential for incidents to occur. At all sites, management will identify high-risk scenarios, develop emergency response plans and train employees to provide an effective response should it be required. Emergency procedures POE 02-015 and contingency plans will be regularly updated and exercises carried out in order to maximize their effectiveness.

Separate emergency plans will be prepared for major operations, such as well operations, that involve a significant change to normal site operations.

A corporate emergency response procedure will also be in place to ensure that emergency communications can be established with senior management.

#### The management emergency response goals are to:

- identify potential emergency scenarios associated with all Pan Orient Energy operations;
- provide easily understood procedures to be followed by personnel at all sites;
- ensure sufficient trained personnel and resources are available to support the control of an incident.

#### Emergency Response Training

Emergency response information is provided to employees during induction. Specific training per POE 02-031 health and Safety Training Requirement will be given relating to the site where an employee is likely to work and emergency response training given when new plans are issued or if plans are amended.

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The emergency response training management goals are to:

- provide a competent response to emergencies;
- to evaluate the effectiveness of response to an emergency.

Emergency response management performance standards:

- availability of clear and concise contingency plans and emergency procedures at all sites;
- sufficient training carried out for identified personnel;
- exercises are planned and carried out regularly;
- documented debriefing and feedback leads to improvements in plans and procedures.

Management responsibility for Emergency Response Plan:

- General Manager/ Operations Manager

#### 4.13 Managing Engineering Design and Construction Change

A design review process will be in place at all company sites which will ensure compliance with all regulatory requirements, codes and standards. Design reviews, held during the various stages of a project, may generate changes to the original design; these are managed using the plant modification procedures.

The management goals for design change control are:

- to ensure all potential hazards connected with a project or design change have been identified;
- to control changes and obtain the necessary approvals before the change is implemented;
- to check the design and consider whether any of the conditions which may occur from either a malfunction or operation, have the potential to cause a hazard to people working on the location or to the installation/equipment;
- to check the precautions incorporated in the design are sufficient;
- to ensure the safety engineering of the design meets the requirements of legislation and any inspection scheme;
- to ensure that the original design has not been compromised by changes at design stage;
- to ensure any operating manual addresses all the safety aspects required by changes.

Performance Standards:

- roles, responsibilities and reporting lines are clearly identified for managing changes;
- design reviews identify the hazards and changes required to mitigate risk;
- design changes are undertaken in accord with the plant modification procedure.

Management Responsibility for Managing Engineering Design and Construction Change

- General Manager/ Operations Manager

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## Section 5: Performance Measurement

Measurement is essential for improving health safety and environment performance. Measurement of performance is achieved by pro-active and reactive monitoring to provide information for feedback and correction.

### 5.1 Active Safety Monitoring

#### Planned Inspections

Planned inspections will be carried out at each site in accordance with a pre-arranged schedule and an inspection checklist. These will be carried out by the line manager responsible for the site. The condition of plant and equipment is measured against pre-determined standards. In this way sequential inspections become comparable and the results can be utilized as a performance indicator. Non-compliance with standards generates nonconformance reports, which are prioritized for action.

The management goals for planned inspections are:

- to establish the condition standards for plant and equipment;
- to measure the level of compliance to the standards;
- to involve employees in the development of standards and in measuring compliance;
- to record and collate inspection records;
- to provide a valid indicator in respect of safety management performance.
- to comply on facility Safety Inspection Procedure (POE-02-026).

#### Safety Meetings Follow Up

Safety meetings and pre-job discussions provide a performance indication of the effectiveness of the SMS.

The management goals for active monitoring are:

- to measure the level of compliance to standards;
- to record and analyze the outputs from monitoring;
- to ensure that follow-up action is taken.

### 5.2 Reactive Monitoring

#### Statistical Reports

The HS Manager and Area Manager record and analyses the statistics on all accidents, damage to plant and equipment, harm to the environment and near misses. Following each accident or incident report the causes of incidents are reviewed to provide an incident as to where increased emphasis or effort needs to be placed.

Incidents are assessed by the HS Manager and Area Manager for their potential severity to identify the level of risk associated with the incident potential.

Incident frequency rate statistics are compiled using conventional frequency rate calculations.

The management goals for reactive monitoring are:

- to provide company performance indicators for safety management against incident and

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potential incident occurrence;

- to identify the root causes of accidents and incidents;
- to identify areas where resources should be directed to prevent recurrence;
- to identify procedural deficiencies that can be addressed to prevent recurrence.

Management performance standards for active and reactive monitoring:

- confirmation that the programme of inspections is being met and reports issued;
- confirmation that the schedule of safety meetings is being met;
- quality of safety meeting minutes and defined actions;
- compilation of on-going incident statistics and identification of trends;
- issue of annual report on monitoring;
- completion of corrective actions following inspection, audit and incident investigation.

Management responsibility for active and reactive monitoring:

- Operations Manager

## Section 6: Reviewing Health and Safety Performance

Review and audit of the SMS provides the feedback loop as identified on the management model in Section 1.3.

### 6.1 Management Performance Review

The overall company health and safety performance is reviewed by collecting evidence from various sources:

- results of audits
- assessment of active and reactive monitoring activities
- feedback from employees
- new legislation.

The evidence is used to feedback into the SMS any changes required to improve performance.

The goals for management review are to:

- review all HS performance indicators and other relevant information;
- identify areas requiring additional resource or redirection of emphasis;
- review Company HS objectives and amend these as necessary.

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## Section 7: SMS Audits

Auditing is a structured process of collecting independent information on the efficiency, effectiveness and reliability of the total health, safety management system and drawing up plans for corrective action. Auditing is not a substitution for the other essential parts of the SMS.

Auditing seeks to establish:

- that the appropriate management arrangements are in place;
- adequate risk control systems exist and are implemented;
- appropriate workplace precautions are in place.

#### Authority and Responsibility

The HSE Officer is responsible for the development of audit programme with advising by the Operations Manager.

#### Audit Frequency

The scope and frequency of internal (and external) audits will be determined according to specific needs and risk rated priorities.

The management goals for auditing the SMS are to:

- determine and report the level of compliance to the SMS standards and procedures;
- determine the level of understanding by employees of the contents of the SMS;
- provide performance indicators as to achievement in the implementation of the SMS which will contribute towards the improvement process;
- recommend remedial action where necessary.

### 7.1 SMS Improvement Plans

SMS improvement plans are generated during safety management review meetings. These provide the detailed actions to be implemented to improve company safety and environmental performance. The implementation of the plans is the responsibility of the **Chief Executive Officer** who reports to the Board of Directors. They are monitored on his behalf by the Health and Safety Manager.

The management goals for improvement plans are to:

- provide an action plan for the improvement of the SMS;
  - what is to be achieved
  - who will do it
  - when will it be completed by
- provide a single reference point for the improvement of the SMS.

The management performance standards for improvement plans are:

- development of an SMS audit plan;
- completion of the annual SMS audit plan;
- completion of the SMS management review;
- generation of management improvement plans with clear objectives, tasks and timescales.



