CORPORATE POLICY

Health, Safety and Environment (HSE) Policy

POLICY NUMBER	OPES-POL-06
VERSION	IFC
POLICY OWNER	Managing Director
APPROVED BY	Board of Directors, 6 March 2025
EFFECTIVE DATE	6 March 2024
NEXT REVIEW	12 months after approval
APPLIES TO	All OPES personnel, subcontractors and visitors, in offices, on client sites, offshore and while travelling

1. Policy statement

At OPES, nothing is more important than the health and safety of people and the protection of the environment. Our goal is zero harm. No work is so urgent or important that it cannot be done safely. The Managing Director is accountable for HSE performance.

2. Our commitments

OPES will:

1. Comply with all applicable HSE laws and with client HSE requirements, applying whichever is stricter
2. Identify hazards and assess risks before any work begins, and control them using the hierarchy of controls
3. Provide competent supervision, training, information and suitable personal protective equipment
4. Give every person the authority and the duty to stop work that is unsafe, without fear of reprisal
5. Report, investigate and learn from all incidents and near misses
6. Prevent pollution, minimise waste and use energy and resources efficiently
7. Consult and involve our people in HSE matters
8. Set HSE objectives, measure performance and continually improve

3. Legal and standards framework

- Ghana: Labour Act, 2003 (Act 651); Factories, Offices and Shops Act, 1970 (Act 328); and the Environmental Protection Act, 2025, together with sector regulations of the Petroleum Commission, Minerals Commission and Energy Commission
- Norway: Working Environment Act and the Petroleum Safety Authority regulations, where OPES works on

Norwegian assets

- International standards: ISO 45001 (Occupational health and safety), ISO 14001 (Environmental management), IFC Performance Standard 2, World Bank Group EHS Guidelines, and IOGP Life-Saving Rules

4. Key requirements

4.1 Risk assessment and planning

Every site visit, field assignment and offshore mobilisation must have a documented risk assessment approved by the engagement lead before travel. High-risk activities, such as lifting operations, work at height, confined space entry and work near energised equipment, require a specific method statement and permit to work under the site owner's system.

4.2 Life-Saving Rules

OPES adopts the IOGP Life-Saving Rules. All personnel and subcontractors must follow them at all times. Breaking a Life-Saving Rule is a serious disciplinary matter.

4.3 Competence and training

Personnel must hold the training and certification required for each site, for example offshore survival and medical certificates, mine site induction, or defensive driving. The HSE lead keeps a training matrix and checks it before every mobilisation.

4.4 Road travel

Road traffic is one of the highest risks for our people in Ghana. OPES requires seat belts for all occupants at all times, prohibits phone use while driving and night driving outside towns unless approved, and uses vetted drivers and roadworthy vehicles for field travel.

4.5 Journey management and security

Travel to remote or higher-risk locations requires a journey management plan, check-in arrangements and up-to-date security information.

4.6 Health and wellbeing

OPES provides access to medical support and travel health advice, including for malaria prevention, and supports the mental health and wellbeing of its people. Alcohol and drugs are prohibited when working, on client sites and when driving for work.

4.7 Subcontractors

Subcontractors are selected on HSE capability as well as cost, must meet the requirements of this policy, and are monitored during the work.

4.8 Environment

In our own operations we minimise travel emissions where practical, reduce paper and waste, and respect environmental rules on client sites. In our advisory work we identify environmental risks and recommend practical mitigation.

5. Incident reporting

All incidents, injuries, near misses and unsafe conditions must be reported to the engagement lead and the HSE lead immediately, and in writing within 24 hours. Serious incidents are reported to the Managing Director at once and to clients and authorities as required by law and contract. Incidents are investigated to find root causes, and lessons are shared across OPES.

6. Roles and responsibilities

Role	Responsibility
Managing Director	Accountable for HSE performance and resources
HSE lead	Maintains the HSE management system, training matrix and incident records
Engagement and project leads	Plan work safely, approve risk assessments, lead by example
All personnel	Follow this policy, stop unsafe work and report hazards and incidents

7. Performance and review

OPES tracks leading indicators (training completion, risk assessments, site inspections) and lagging indicators (lost-time injuries, recordable injuries, near misses, environmental incidents). Performance is reported to the Board at least twice a year. This policy is reviewed every 12 months and displayed at OPES offices.