

# Corporate Major Accident Prevention Policy

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This policy applies to Equinor UK Limited's upstream operations including all exploration, development, production and decommissioning activities. It outlines the management and control of major accident hazards (MAH) and highlights the company's commitment to achieving high standards of safety and environmental management. Equinor UK Limited is a subsidiary of Equinor ASA. For the purposes of this CMAPP, Equinor UK Ltd is referred to as Equinor.

## **Command and Control**

Equinor's Board of Directors is responsible for overseeing the company's operations and ensuring they are conducted in accordance with the principles outlined in The Equinor Book. Further, the Board retains responsibility for ensuring this CMAPP is suitable, implemented and operating as intended.

The Equinor organisation is structured to be able to respond to current and future business needs. It includes the Exploration and Production International UK (EPI UKI) Business Area which is accountable for safe and efficient operations of upstream offshore assets in the UK.

The Senior Vice President (SVP) of EPI UKI is the most senior person within the UK Business Area. The SVP EPI UKI is fully accountable for all Equinor's upstream oil and gas activities that have the potential to introduce a Major Accident Hazard and responsible for implementing this CMAPP.

SVP EPI UKI chairs the EPI UKI Management Committee and fulfils the role as Location Manager in Aberdeen. The VP OPS Production is a member of the EPI UKI Management Committee and reports to the SVP EPI UKI.

For Equinor UK operated assets, the VP OPS Production is accountable for safe, efficient and sustainable operations, is the Duty Holder operational representative and assists the SVP EPI UKI in the implementation of this CMAPP.

## Safety Culture

We are committed to providing a safe and secure environment for everyone working at our facilities and job sites. Equinor's safety and security vision is zero harm, with a proactive safety culture to prevent major accidents.

- 1. The *I Am Safety Roadmap* illustrates the plan and commitment to continually improve safety culture and performance. The main pillars of the roadmap are,
  - safety visibility,
  - leadership & behaviour,
  - learning & follow up and
  - safety indicators.

- 2. I Am Safety Roadmap is underpinned by the *I Am Safety Expectations* and the *Framework for Major Accident Hazard Prevention.*
- 3. The *I Am Safety Expectations* are commitment statements that apply to anyone that works for Equinor, with expectations described for three groups: Everyone; Leaders; and Executives (managers and above) through which, we are able to hold each other to account and aspire to create and sustain a generative safety culture.
- 4. The Framework for Major Accident Prevention pillars are:
  - leadership, culture and organisational frame conditions,
  - safe design and practices
  - safety barriers.

Human and organizational performance principles are embedded in the framework.

5. Continual Improvement is delivered through review of our performance, trending of key data and learning from our mistakes. This is in addition to engagement and communication with the workforce to inform our improvement plans.

## Safety and Environmental Management System

Equinor's safety culture is implemented through the Safety and Environmental Management System (SEMS).

- 6. The SEMS contains the requirements and processes we need to identify, assess and manage Major Accident Hazards.
- 7. Through compliance with the management system requirements, we conduct activities in a safe and efficient manner, thus reinforcing the control of Major Accident Hazards.
- 8. Through planned self-assessment, Equinor assures all employees comply with the SEMS, which also ensures that commitments outlined in the Safety Case are met.
- 9. Key elements of the SEMS for continuous safe operation in a major hazard environment include:

#### Identification and management of MAH

- 10. The risk management process (RM100) within Equinor's management system provides a structured approach to management of MAH risks that could arise from both incidents or planned operations.
- 11. The RM100 process sets the framework for compliance with Relevant Statutory Provisions (RSPs) and demonstrates that risks are both tolerable and As Low As Reasonably Practicable (ALARP).
- 12. The control of MAH risks is maintained throughout the life-cycle of our operations, from project planning and execution in design through to operations and maintenance. Hazards are continually considered and reassessed through the application of hazard identification, and risk assessment including the management of change, control of work and hands-on activities.
- 13. These activities are mandated for and supported by the Framework for Major Accident Prevention.
- 14. Equinor's performance framework process, known as "Ambition to Action", translates Equinor's activities into strategic objectives, risks, KPIs and actions describing what we want to deliver.

### Technical Integrity

- 15. EPI UKI operated assets comply with UK legislation and adhere to good industry practice on integrity management;
- 16. The commitment of Equinor's senior leadership team is demonstrated and outlined within the Operational Management and Control document, OMC 02.
- 17. The condition (functionality, availability, reliability, survivability, and independence) of Safety and Environmentally Critical Elements (SECEs) on the assets are measured against Performance Standards through the relevant assurance activities and the supporting Verification Scheme, as defined in the local TR1055 substitution according to OM104.11 & OM104.12.
- 18. The EPI UKI Well Examination Scheme, WR2693, is implemented to ensure that every well is designed, constructed, and maintained in a condition that,
  - so far as is reasonably practicable, there is no unplanned release of fluids from the well and
  - risks to the health and safety of persons from it or anything in it, or strata to which it is connected, are as low as reasonably practicable (ALARP).
- 19. Equinor's Technical Integrity Management Portal (TIMP) provides a systematic method of evaluating and documenting the technical condition of a plant. The TIMP tool is routinely updated to reflect the overall health status of each SECE, providing leadership with an understanding of overall condition of the asset in management of major accident hazards.
- 20. Observed deficiencies are risk assessed with proportionate measures established and / or through establishment of an Operational Risk Assessment, in line with procedure WR2931.

#### **Continuous Improvement**

- 21. Processes are in place to monitor and review performance to drive continuous HSE improvement with particular focus on management and control of MAHs.
- 22. "Compliance and Leadership" tool is aligned to the Plan Do Check Act principles and is used to manage risks. It requires that we apply consistent precision and quality when we plan, execute and evaluate all tasks.
- 23. Control of work within Equinor is defined in process OM105 Safe Work. Safe Work is managed using an electronic Permit to Work (PTW) system (Permit Vision) and is underpinned by work control processes including isolation, pressure testing and confined space entry. All permitted work is supported by a formal risk assessment process to minimise risks to people, the environment and the integrity of the installation.
- 24. Daily risk management activities are conducted to ensure the maintenance and improvement of safety performance as well as the promotion of open communication. Daily risk management activities include:
  - daily risk meetings,
  - shift handovers,
  - open safety dialogue, and
  - reporting of safe or unsafe conditions and behaviours.
- 25. The work permit coordination meeting/pre-meeting is central in the daily risk management process, together with weekly management inspections to verify the process is functioning.
- 26. All accidents and incidents must be reported and recorded in the Equinor incident management and reporting system, as defined in SF103 Handle Safety and Security Incident.

- 27. All HSE incidents (accidents/loss or near miss) are classified according to their actual and potential severity. This forms the basis for a decision on any further follow-up in the form of notification, level of investigation, reporting, analysis, experience transfer or improvement.
- 28. The process specifies roles and responsibilities for initiating and conducting an investigation and agreeing actions to reduce the risk of recurrence.
- 29. Equinor has established an independent ethics helpline to raise concerns and any suspected or potential breach of law or company policies, including Equinor's Code of Conduct. This includes concerns pertaining to violations of environmental regulations and safety or security hazards. This ethics helpline is available to all personnel, including third parties, and ensures the confidentiality and anonymity of reporters to protect whistle-blowers.

#### Assurance

- 30. Assurance of the Equinor SEMS is planned on the basis of risk. It is documented and conducted to provide confidence and confirmation that the Management System is effective, achieving its purpose and expected performance.
- 31. WR3024 Assurance Planning and Execution defines the steps for 5-year assurance planning and execution.
- 32. Three levels of assurance exist within the Equinor Management System:
  - Self-assessment: providing confirmation and confidence that operations are run in accordance with the management system objectives,
  - Verifications: internal independent assessments of high-impact risks; and
  - Audits: independent systematic reviews with a formal mandate from the Equinor Group board of directors.
- 33. Equinor's assurance is conducted to ensure that MAH management (which includes developing, maintaining and assuring compliance with the CMAPP) is effectively implemented and continually improved. This is achieved by adhering to the following:
  - Assurance activity is prioritised based on risk
  - All findings are documented in the Equinor Management Information System (MIS) and or Incident Management System (Synergi Life) with corresponding actions agreed with relevant stakeholders
  - All findings are followed up to ensure that any learning is incorporated into the management system
  - Any significant issues and findings are escalated to SVP EPI UKI to communicate to the board as required
  - Significant changes to approved activities require SVP EPI UKI and or VP OPS Production approval
  - Highlighting good practice and lessons learned
- 34. Assurance and verification of the technical integrity over the entire asset lifecycle is an integral part of the company's MAH risk management arrangements.
- 35. Equinor's Framework for Major Accident Prevention defines the structure to manage identified major accidents based on recognized best practice for high-risk industries. The effectiveness of the CMAPP and the Framework is routinely reviewed and included within the EPI UKI assurance plan.
- 36. In addition to internal reviews conducted through the technical authority framework, EPI UKI has processes in place that involve review of its assets' safety & environmental critical elements/performance standards by an appointed independent and competent verifier (as part of their written scheme verification), and the well examiner (as part of the well examination schemes), respectively.

## **Emergency Response**

Equinor's emergency response and incident management arrangements are effectively implemented, and fully resourced, to respond to incidents and emergencies involving Equinor owned or operated assets and locations. The Location Manager is overall accountable for the implementation of the Emergency Response arrangements at the EPI UKI level.

- 37. As per the SF700 process 'Preparedness and response', this is delivered through our organisation's tiered response levels that are based on incident severity and through which clear lines of communication and escalation are maintained.
- 38. The Emergency Response Team (Line 1) are provided with specific Emergency Response Plans developed to address identified scenarios. These are supported by the Incident Management Team (Line 2) Emergency Response Plan and organisation. The Crisis Management Team (Line 3) organisation is available for strategic decisions and provide additional support.
- 39. Emergency Response and incident management capabilities shall be maintained through systematic training as per SF700 requirements.

## **Competency and Desired Behaviours**

A strong safety culture requires a competent workforce, compliance to the management system and work processes as well as local and national regulations.

- 40. Equinor employees (at all levels within the organisation) are required to be competent to conduct their activities in a safe manner. Responsibilities are documented, communicated and understood. This is managed through Equinor's Competence Assurance Management Solution (CAMS).
- 41. The Corporate Competence Assurance Policy sets out corporate expectations with respect to training and competency. Personal development of Equinor personnel is managed and documented via Equinor's in-house career and development/performance management process "People@Equinor".
- 42. People@Equinor links our values, leadership profile and business strategy with individual and team performance. Along with Ambition to Action, the People@Equinor process forms the core of our performance framework.
- 43. People@Equinor process is common across the organisation and runs on a continuous cycle, where performance is evaluated equally on what you deliver and how you deliver. Performance and development goals are set and reviewed dynamically. Our business objectives help set the direction for our development plans. These development plans balance the needs of the business with our individual aspirations.
- 44. Equinor actively monitors contractor competency via the contractor selection, procurement and ongoing assurance processes.

## **Continuous Monitoring of CMAPP Effectiveness**

In accordance with the Assurance and Execution Process, Equinor ensures this Policy remains suitable and effective. Senior Management shall confirm the CMAPP is current and reflects the organisation's approach to the management and control of major accident hazards throughout its operations.

- 45. Any significant change to the controls or arrangements in place to manage Major Accidents can initiate a change in the CMAPP and the SEMS.
- 46. Any changes to the CMAPP are reviewed and endorsed by the SVP EPI UKI, the EPI UKI Management Committee and approved by the Equinor UK Limited Board of Directors.

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