Health, Safety & Environment Management Plan (FMPS)

QHSE Management System Resource

Document Information Sheet		
Title: Health Safety and Environment Management Plan		
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Revision Record:

Rev	Date	Description	Revised By	Approved By
1	28.06.2019	Restructure of MPK ERP to align with other Wells Division operations	C. Allen	S. D Souza
2	28.07.2019	Update of SMP to suit NT operations and legislation for scope of work	C. Allen	A. Gainsforth
3	07/08/2020	Update reviewed MPK policies and organizational chart	C. Allen	B. Belchior

CONTENTS

1. DESCRIPTION OF OPERATING PLANT

The “Operator” for the Operating plant associated with operations as detailed within this HSEMP is MPC Kinetic, with the Operating Plant located and distributed from the Roma Base #2, 2/16 Cartwright Street, Roma Queensland 4455.

The MPC Kinetic Operational facilities are subject to a legislative environment that includes the Queensland Petroleum and Gas (Production and Safety) Act 2004 (P&G Act). All operations This legislative instrument requires operators of operating plant to develop a safety management plan (section 674 of the P&G Act) in accordance with the content requirements established in section 675 of the P&G Act. This document has been developed to satisfy both the relevant legislative requirements as well as provide an internal tool describing the systems, processes and control measures implemented to ensure that identified risks at MPC Kinetic Operational facilities have been eliminated or reduced to ALARP.

MPC Kinetic FMPS operations with regards to Operating Plant includes Well Services and Biocide Operations.

Well Services conducts installation, maintenance and testing of wellhead and infrastructure, effectively conducting works which interface between Rig and Fracture Stimulation and Production activities. Well Services performs tasks on Operating Plant such as maintenance of a wellhead on a Petroleum lease, and as per the legislation, the operating plant includes the pumps (triplex and haskiel pump).

Biocide Operations assists in the management of bacterial activity in systems and infrastructure such as reducing and preventing bacterial and fungal activity in down-hole, and preventing corrosion caused by bacterial activity.

1.1 Client Operating Plant

Client Operating Plant is from the well head and associated valving and pipelines to the separator through to the client Gas Processing Facilities. This also includes all well auxiliary equipment and make up including down-hole casing, tubing and pumping assemblies.

1.2 MPC Kinetic Operating Plant

MPC Kinetic Operating Plant is all equipment owned and operated by MPC Kinetic Fluid Management & Production Services to facilitate well intervention reservoir evaluation, well services and such activities described within this QHSEMP.

The Company shall ensure an adequate number of competent personnel are engaged to operate the plant to provide the services offered. Personnel levels may vary depending on operations and contractual obligations, although the Company maintains a number of skilled personnel continually of approximately fifty (50), additional resources can be sought from the MPC Kinetic FMPS branch of the MPC Kinetic Group (Parent Company). Contractors are engaged as required, usually as a specialist service.

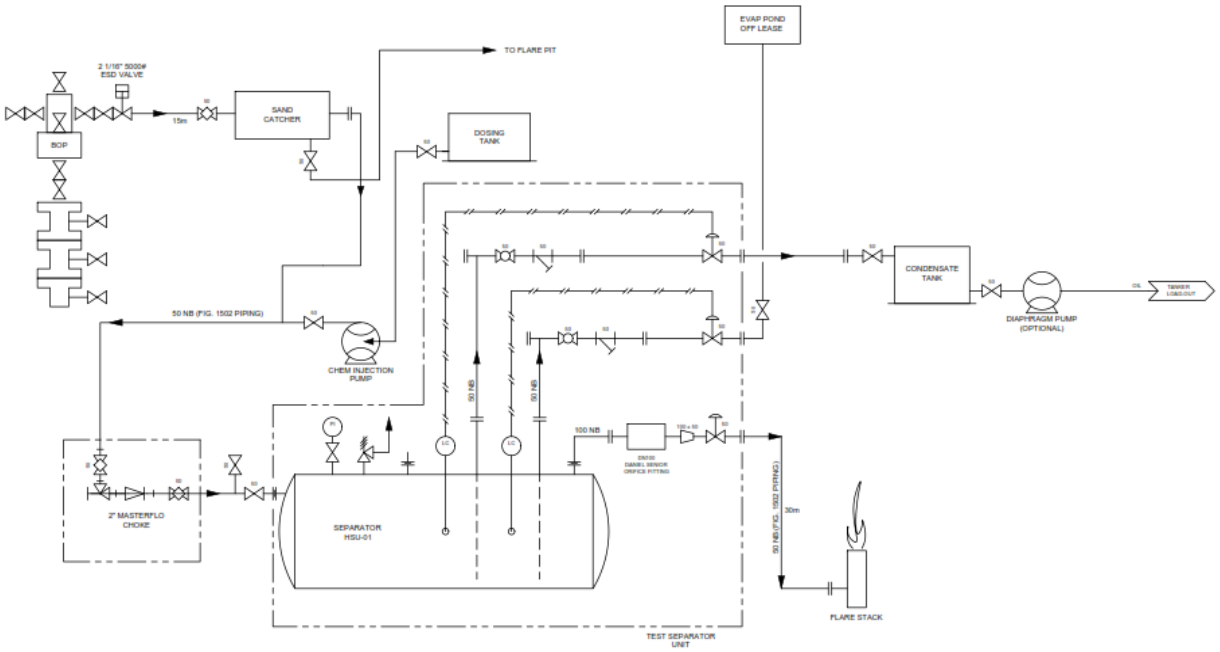
Plant Description	Plant Age (DOM)	Plant History (inc previous Owners)	Significant Modifications	Nature of Plant	No. of Plant
Triplex Pump		New purchase	None	Production Services Unit	2
Haskiel Pump		New purchase	None	Production Services Unit	2
Biocide Unit		New purchase	None	Fluid Management Unit	2

1.3 Operating Plant Layout Maps

Although leases are of similar sizes, the layout of the operating plant and infrastructure is consistently different due to a number of factors for example rig package, lease size and construction, and as such, requires an element of flexibility in the positioning of Operating Plant at site, preventing a standardized layout map to be set. The composition of the operating plant however comprises of the same major plant sections & components as illustrated in the following Flow Diagrams. To manage this variable, open and consistent communication between all invested parties at site i.e. Operating Company Representative and Rig Contractor Representative are consulted at site to determine a suitable area to commence operations.

1.4 Flow Diagram

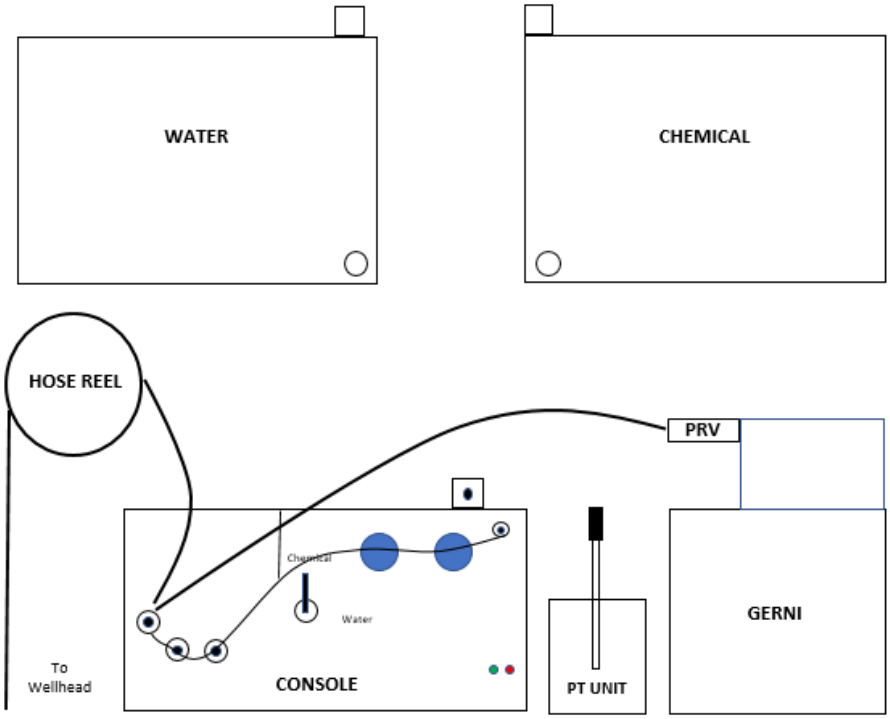
1.4.1 Well Services Operating Plant



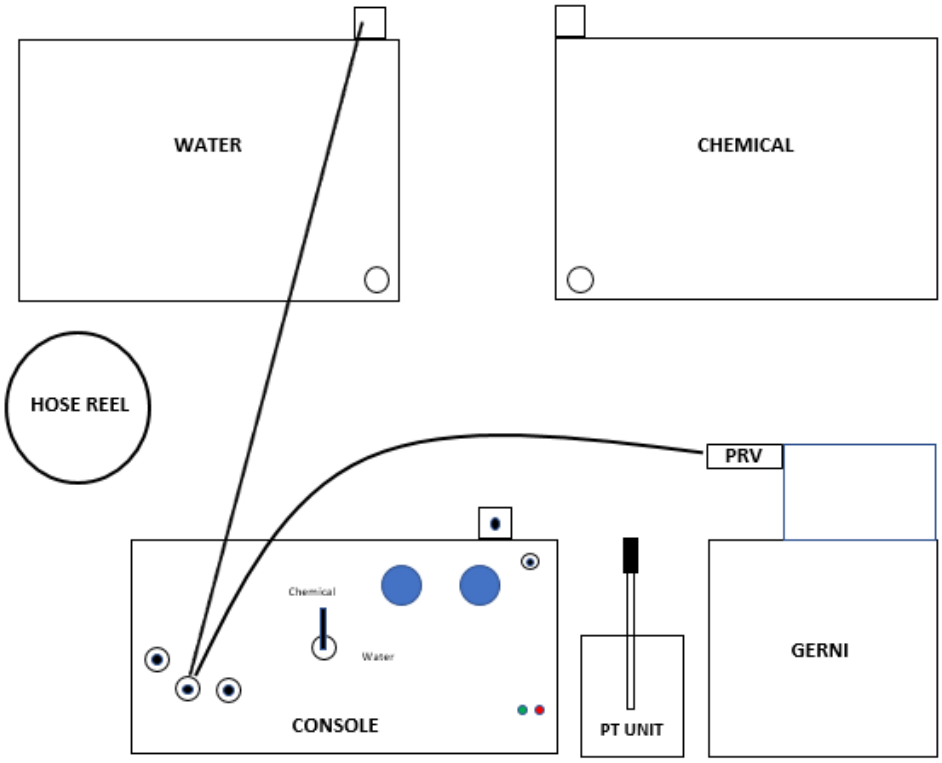
1	2 1/16” 10,000 PSI x 2” FIG. 1502
2	2 1/16” 10,000 PSI x 2” FIG. 1502 2 1/16” 15,000 PSI x 2” FIG. 1502
3	4” Hoses & Pump
4	4” WECO Adapter Flange at Tank

MPC Kinetic Production Services
Test Wellhead Flow-back Line Configuration
Piping & Instrumentation Diagram

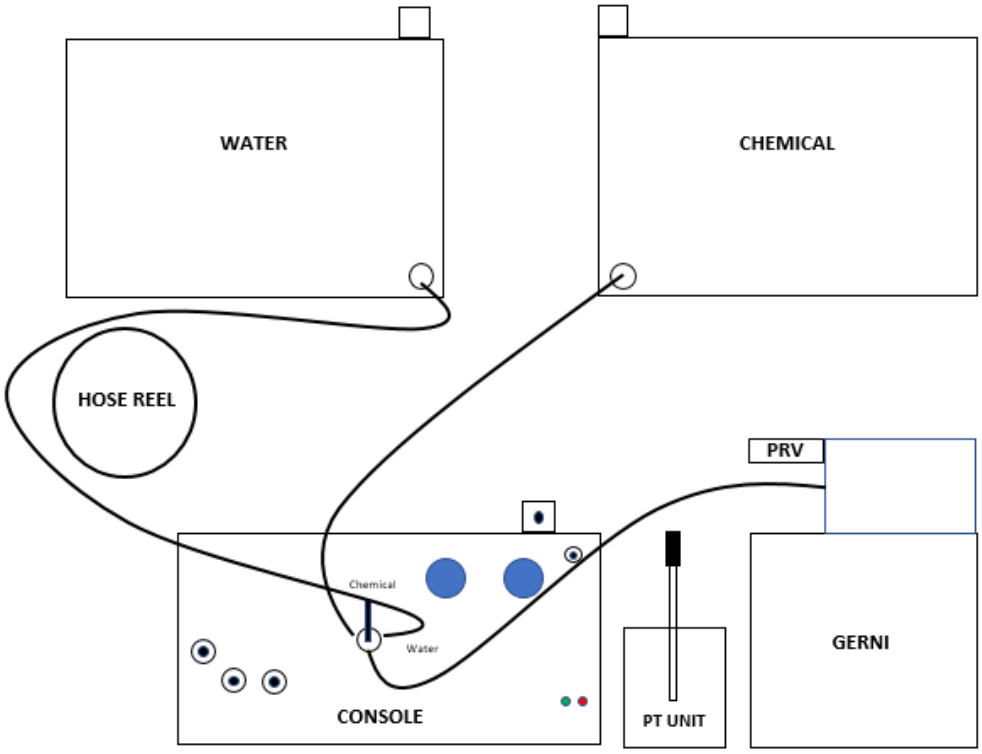
1.4.2 Fluid Management Biocide Unit Discharge Schematic



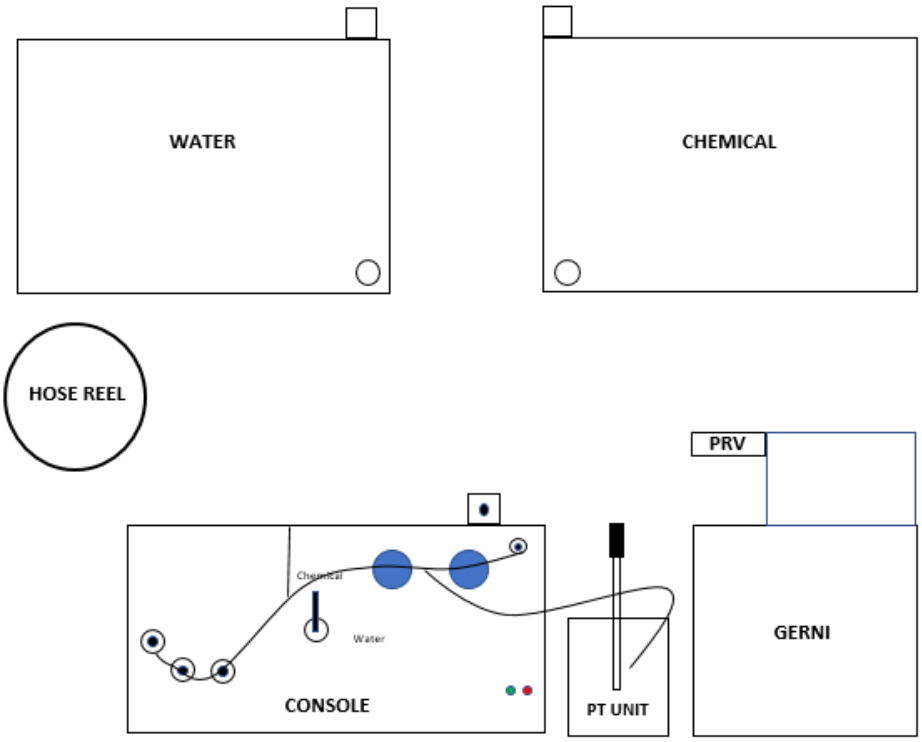
1.4.3 Fluid Management Biocide Unit PRV Schematic



1.4.4 Fluid Management Biocide Unit Suction Schematic



1.4.5 Fluid Management Biocide Unit PT Unit Schematic



1.5 Operating Plant Activities

1.5.1 Well Services

MPC Kinetic Production Services operating plant is used for activities performed facilitating all non-regulated well work including, but not limited to:

- Facilitate wells, wellheads, surface infrastructure and leases for any major intervention works pre-rig and/or fracture stimulation interaction/activities):
    - wellhead maintenance,
    - well testing and integrity,
    - production support maintenance,
    - surface equipment servicing and replacement
- Facilitate and prepare the wellhead and surface facilities and all connected infrastructure for post rig or fracture stimulation interaction / activities:
    - Re-assembly and infrastructure surface facilities;
    - Conduct integrity checks and tests on wellhead equipment and surface facilities,
- Service and maintenance;
- Lease preparation for handover to Production.

Well Services shall abide by the processes within this Manual and the systems provided by MPC Kinetic to manage QHSE matters for their business activities.

1.5.2 Biocide Unit

MPC Kinetic Fluid Management operating plant is used for activities facilitating all non-regulated well work, including, but is not limited to:

- Assist in the management of bacterial activity in systems and infrastructure:
- Reduce and prevent bacterial and fungal activity down-hole;
- Prevents corrosion caused by bacterial activity
- Provides long-term protection of well casing by eliminating microbiologically induced corrosion.
- Batch treatment or Continuous treatments

Fluid Management shall abide by the processes within this manual and the systems provided by MPC Kinetic to manage QHSE matters for their business activities.

2. POLICIES

MPC Kinetic maintain set goals and objectives for critical matters pertaining to the safe, efficient, ethical and sustainable conduct of our business operations. These set goals and objectives are communicated in the highest form of Policies which are displayed where all workers and visitors can view them. They are maintained in accordance with our document control and record management procedure. Policies applicable to our QHSE obligations and Industry expectations include, but are not limited to:

- Health and Safety Policy
- Environment and Social Responsibility Policy
- Quality Policy
- Governance Policy
- Rehabilitation & Return to Work Policy

These policies are included within these manual on the following pages.

Supporting Documentation:

- Health and Safety Policy
- Environment and Sustainability Policy
- Quality Policy
- Governance Policy
- Rehabilitation & Return to Work Policy (KIN-AOG-QHSE-POL006-Rehab & RTW Policy)
- Chain of Responsibility Policy (KIN-AOG-QHSE-POL007-CoR Policy)
- Code of Conduct Policy (WIS-AOG-QHSE-POL008-COC Policy)

2.1 Health and Safety Policy

Health and Safety Policy

MPC KINETIC

At MPC Kinetic we believe that a safe and healthy working environment is fundamental to our success and we are committed to the health and safety of all people in our workplaces. To demonstrate our commitment, we will:

- Be open and transparent in Health and Safety practices and management;
- Create a positive work culture and ensure that everyone understands what is expected of them;
- Provide information, training, instruction and supervision to enable our team members to conduct activities in a safe manner;
- Create an environment of continual improvement where risks to health and safety are eliminated or minimized to as low as reasonably practical;
- Provide proactive leadership and promote the personal responsibility of every individual for the health and safety of themselves and others;
- Consult, cooperate and coordinate with our team members, contractors and other stakeholders regarding health and safety matters; and
- Support action aimed at increasing work safety and wellbeing outside work hours.

As a minimum, we will comply with the work health and safety performance requirements set by relevant legislation. We will establish measurable objectives and targets to ensure continued improvement aimed at elimination of work-related injury and illness through our Work Health and Safety Management System which is certified to the Australian Standard (AS/NZS 4801:2001).

John Smith
Chief Executive Officer
MPC Kinetic Holdings Limited

Date: 1 July 2020

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2.2 Environment and Social Responsibility Policy

Environmental and Social Responsibility Policy

MPC KINETIC

Environmental

At MPC Kinetic we are committed to managing our environmental footprint and minimising our impact on the environment. As we operate across a range of diverse and sensitive areas, we use consistent processes and methods, reflecting best practice in environmental management.

To demonstrate our commitment, we:

- Ensure environmental management is a part of our everyday decisions and processes;
- Take personal accountability for our environmental performance;
- Engage with industry, clients, communities and regulators to foster innovation and continual improvement;
- Use risk management principles and appropriate controls to eliminate, substitute or mitigate environmental impacts; and
- Improve our energy efficiency and promote sustainable use of resources.

As a minimum, we ensure that our Environmental Management System provides a sound framework to ensure environmental management processes are applied across the business. We will continually review and improve our Environmental Management System and ensure we remain certified to the International Standard (ISO 14001).

Social Responsibility

MPK has an overarching and strong corporate social responsibility philosophy which influences the company's ongoing pursuit of making positive contributions to society.

MPK recognise the potential for impacts on neighboring residents, businesses and the broader community which may arise during projects and regards managing its social impact as integral to its business operations.

Our stakeholders include landholders, neighbors, councils, local and state government authorities, goods and services providers, environmental groups, cultural groups, clients and others.

Establishing and maintaining positive relationships will be achieved through agreements with our clients and a range of genuine and effective communication strategies with the broader community.

To deliver on our commitment, we will:

- Recognise that positive social performance is an intrinsic part of our business;
- Incorporate field-proven social performance strategies into project planning, execution and completion;
- Seek innovative solutions to enhance social performance outcomes for our clients and their stakeholders;
- Look for positive local economic outcomes by engaging local contractors, service providers and community groups and provide genuine local employment opportunities;
- Be sensitive to the cultures of the communities in which we operate and treat all people with respect;
- Take an active role in our client's community programs and add value to those programs where possible; and
- Support local communities through sponsorships, donations and workforce participation where appropriate.

To meet our commitments, we will develop, implement and maintain, people-focused management standards and systems, and comply with relevant industry standards and legal requirements.

Positive social performance is the responsibility of the whole company and accountability for the application of this policy lies with the Communications and Social Performance Manager.

John Smith
Chief Executive Officer
MPC Kinetic Holdings Limted

Date: 1 July 2020

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2.3 Quality Policy

Quality Policy

MPC KINETIC

At MPC Kinetic we are committed to ensuring the consistent delivery of quality products and processes that meet or exceed our client's expectations and believe this is key to our ongoing success. We ensure that all team members understand and take ownership for the quality standards. To demonstrate our commitment, we will:

- Provide adequate resources to continually review and improve our business process;
- Encourage all people to integrate quality management into the way we work and promote its application as a method for continual improvement within their area of responsibility;
- Actively seek performance feedback from our customers and address opportunities for improvement that are identified;
- Engage with industry, clients and regulators to foster innovation and continual improvement; and
- We review and improve the effectiveness of our systems on a continual basis through our governance program.

As a minimum, we ensure our Quality Management System provides a sound framework to ensure Quality management, assurance and control processes are applied across our business. We will continually review and improve our Quality Management System and ensure we remain certified to the International Standard (ISO 9001).

John Smith
Chief Executive Officer
MPC Kinetic Holdings Limited

Date: 1 July 2020

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2.4 Governance Policy

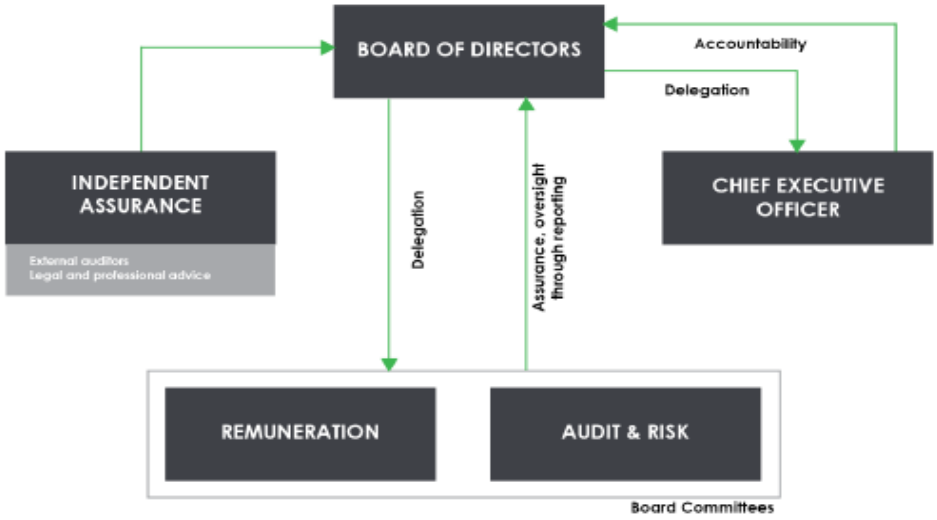
Governance Policy

MPC KINETIC

Corporate Governance is the process necessary to ensure that MPC Kinetic is appropriately complying with laws and regulations particular to the business. It also includes ensuring fairness, transparency and accountability by clearly setting out the responsibilities of employees involved in the management of the business.

We at MPC Kinetic believe that good governance is at the heart of a successful and well-respected business. More than just showing a commitment to doing the right thing, good governance is a strong indicator of overall management capability and quality.

The diagram below shows MPC Kinetic's governance framework, including Committees of the Board.



Where relevant, MPC Kinetic applies the "ASX Corporate Governance Principles and Recommendations". In particular, we recognise the following:

- We set clear roles and responsibilities for our management team;
- We promote ethical and responsible decision making in everything we do;
- We safeguard the integrity of our finances through controls and reporting;
- We have a robust system for recognizing and managing risk; and
- We remunerate fairly and responsibly.

John Smith

Chief Executive Officer
MPC Kinetic Holdings Limited

Date: 1 July 2020

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2.5 Stop Work Policy

It is the belief of MPC Kinetic (PCBU) that the management of safety and the protection of the environment are fundamental to all its operations and activities throughout each of its business units.

In order to achieve its safety objectives, MPC Kinetic requests that all personnel affected by its operations personally enforce our commitment to:

STOP ALL WORK CONSIDERED UNSAFE

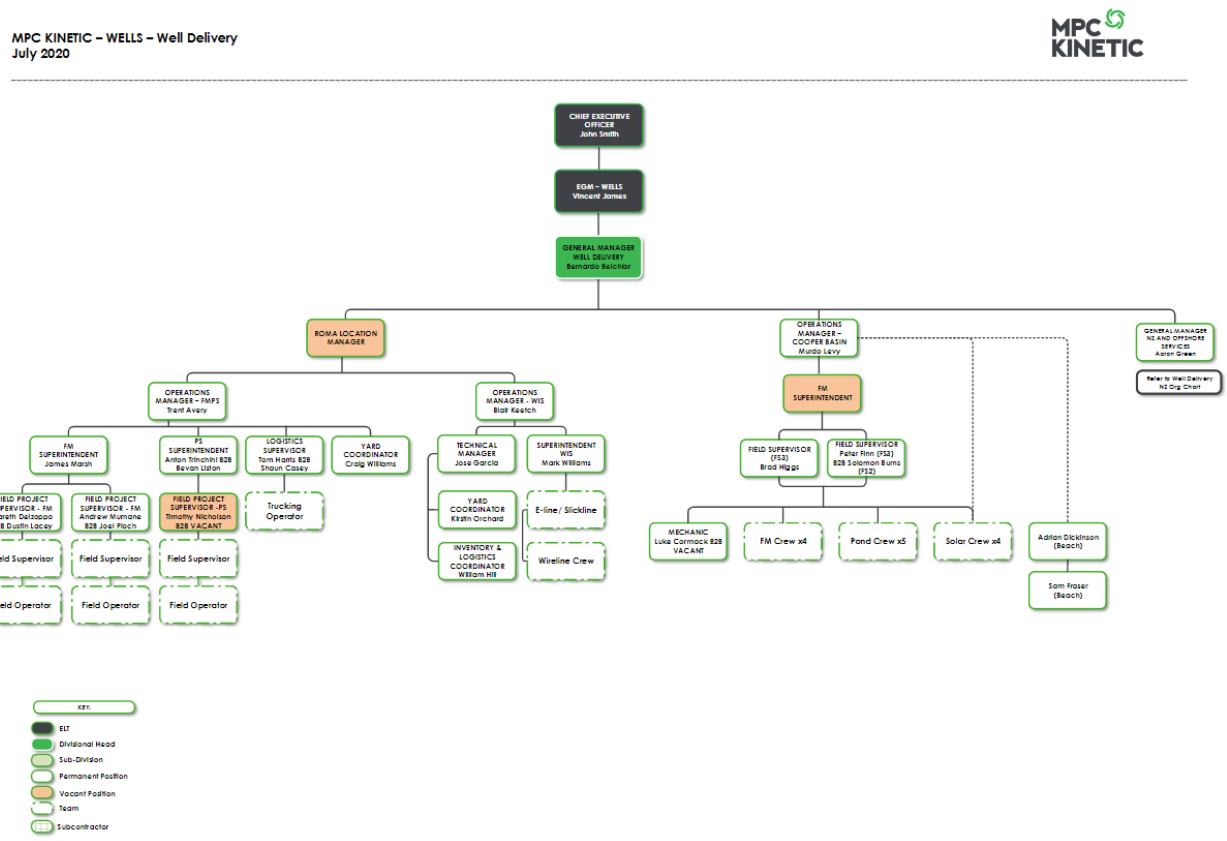
An unsafe task that is being stopped can only resume after a Senior Supervisor has verified and approved that the necessary precautions have been taken and that the remaining risk to perform the task is acceptable and justified and reduce to as low as reasonably practicable (ALARP)

The management of MPC Kinetic affirms that no individual will receive any negative repercussions for stopping any task considered unsafe.

No task is so important or urgent that time cannot be taken to ensure it is done safely.

3. ORGANISATIONAL STRUCTURE AND RESPONSIBILITIES

3.1 Company Organisational Chart



The resources required to ensure the QHSE objectives are met and sustained across the company have been identified and the risk management process applied to ensure adequate controls are available. Further detail pertaining to the resources secured are included within the Company Hazard Risk Register – a corporate risk assessment identifying and controlling identified risks applicable to the business. The MPC Kinetic QHSE Management System (QHSEMS) provides the structure to manage QHSE matters.

All workers are provided with a position description relevant to the engaged role to enable full understanding of the role, expectations and any targets to be achieved. Individual Key Performance Indicators (KPI's) are also set for Operations, QHSE and Training. These KPI's are maintained monthly in accordance with the QHSE Statistics and reviewed formally on an annual basis or fore cause as required.

3.2 Executive Safety Manager

- Where there is more than 1 holder of a petroleum authority, geothermal tenure or GHG tenure with 1 or more of the holders being a corporation and OP is being operated or is proposed to be operated in the authority's or tenure's area, then the holders must ensure the chief inspector is given a notice stating which corporation or organisation is responsible for the management and safe operation of OP in the area.

- If the operator is a corporation – nominated an individual as a representative of the operator to give and receive information for the operator under the Petroleum & Gas (Production & Safety) Act and;
- To remove any doubt, it is declared that-
  - A nomination of an operator's representative does not affect an obligation imposed on the operator under the Act; and
  - Any information given to or by an operator's representative is taken to have been given to or by the operator
- The ESM, as the Operator, must ensure that the plant has:
  - a SMP, for each stage of the plant, as required under s674 (1) of the P&G (Production & Safety) Act, that has been made after consultation with the employees at the plant; or
  - alternatively, a generic SMP adopted for the plant
- The ESM must approve the plan before it is put into effect and ensure the plan is implemented in a way that effectively manages the risks associated with the plant.
- The ESM for an OP must, on or before 1 September each year, lodge with the chief inspector a safety report for the plant in relation to the preceding financial year that complies with the relevant legislation.
- If no-one has been appointed as the site safety manager for a site at an operating plant, the site safety manager is, if the operator is a corporation – the executive safety manager of the operating plant.
- Ensure chief inspector is given notice before a plant is commissioned or operated;
- The ESM for an OP must, on or before 1 September each year, lodge with the chief inspector a safety report for the plant in relation to the preceding financial year that complies with the relevant legislation.

3.3 Operations Manager

The MPC Kinetic Operations Manager is accountable and responsible for:

- Ensuring the appointment of appropriate qualified personnel as the Site Safety Manager of the plant occurs.
- Ensure adherence to a suitable QHSE Management System in place and is complied with by all invested parties;
- Approving the HSEMP before it is put into effect.
- Ensuring the HSEMP is implemented and that it effectively manages the risk associated to the plant.
- The overall health and safety of MPC Kinetic workers, Contractors and Visitors to MPC Kinetic Sites.
- Reviewing and approving, changes as required to the QHSEMS.
- The delegation of MPC Kinetic QHSE responsibilities to subordinates.
- Approval and sign off on MPC Kinetic Major and High Risk Incident Investigations.
- Reviewing and approving, changes as required to the QHSEMS.

- Complying with workplace health and safety obligations under relevant legislation, regulations and codes of practices.
- Ensure resulting records for the QHSEMS are available and maintained
- Providing and encouraging a Stop Work Authority (SWA) culture.
- Allocation of resources to ensure adequate QHSE performance and compliance as outlined in this HSEMP.
-

3.4 Operational Supervisors (also function as Site Safety Managers/Person in Charge)

MPC Kinetic Supervisors are accountable and responsible for:

- Ensuring they have the skills and competencies to perform their duties and HSE responsibilities.
- Ensuring they understand their obligations as the most Senior Site based personnel and their responsibilities as the designated “Site Safety Managers” as described in the Queensland Petroleum and Gas (Production and Safety) Regulations 2004.
- Participating in risk assessments for the activities the operating plant are conducting and associated with to ensure they are kept to a level as low as reasonably practicable.
- Providing information, instruction and supervision to all team members under their control, to ensure that HSE Policies and Procedures are followed at all times and any risk is minimised.
- Ensuring client QHSE responsibilities are defined and adhered to by all team members and contractors.
- Reporting QHSE incidents in accordance with the MPC Kinetic and relevant clients’ incident reporting requirements.
- Ensuring the work environment (including facilities and equipment) is safe and that work tasks can be performed safely.
- Ensuring SOPs and JHAs are available and followed by personnel involved in the operation of the operating plant
- Ensuring all team members and sub-contractors are fully inducted, hold current and valid licences and competencies for the task they are conducting and that those competencies have been verified (VOC) for MPC Kinetic.
- Ensuring all team members, contractors and visitors abide by the requirements of the MPC Kinetic Fitness for Work Procedure before work commences each day / shift.
- Complying with workplace health and safety obligations under relevant legislation, regulations and codes of practices.
- Encourage a SWA culture and ensuring that once a Stop Work has been initiated all relevant personnel have been notified and that that no work commences until the SWA has been adequately addressed.
- Conducting site based Safety Drills and Emergency Response Drills to ensure all Employees understand and are competent at performing their designated roles in respect of Safety and Emergency drills.

- Ensuring that each person who enters the site is given an appropriate site induction that enables that person to comply with all relevant HSE Policies, Procedures, Safety Management and Emergency Response Plans for the site and that the Induction is relevant to the work / visit that the person shall be undertaking whilst on site.

3.5 Employees and Contractors (Workers)

MPC Kinetic employees and contractors are accountable and responsible for:

- Complying with all reasonable directions of the Site Supervisors, Management and the HSEMP.
- Are responsible for their own safety and for those around them.
- Responsible and obliged to initiate a Stop Work Authority.
- Understanding, familiarising themselves and complying with all HSE Procedures and the requirements of this QHSEMP.
- Seeking clarification on work instructions and requirements if unsure how to proceed with any task.
- Reporting, and immediately acting on any unsafe practices, unhealthy conditions and hazards as they are identified.
- Correctly using and maintaining all tools, equipment, plant and materials.
- Correctly using and maintaining all safety devices and personal protective equipment.
- Reporting all injuries, equipment damage and near miss incidents to their supervisor.

3.6 QHSE

The MPC Kinetic QHSE person is accountable and responsible for:

- Developing and maintaining a MPC Kinetic QHSE management system.
- Monitoring and reporting MPC Kinetic QHSE performance.
- Leading or assisting Management in the investigation of MPC Kinetic Incidents.
- Complying with workplace health and safety obligations under relevant legislation, regulations and codes of practices.
- Providing advice and support to all MPC Kinetic workers regarding QHSE issues to ensure:
  - QHSE policies and practices are implemented and comply with legislative requirements; and
  - Personnel have the knowledge to meet their HSE responsibilities through the provision of appropriate training.

Supporting Documentation:

- Organisational Chart (KIN-AOG-QHSE-FRM002-Org. Chart)
- Position Descriptions
- Site Safety Manager Appointment Form (KIN-AOG-QHSE-FRM016-Appointment of SSM)

4. SITE SAFETY MANAGER/PERSON IN CHARGE

As described in Section 1, MPC Kinetic is in charge of Operating Plant which in accordance with legislation, requires a number of safety measures be instated, including the appointment of a Site Safety Manager/Person in Charge for the plant. Senior Management are responsible for selecting personnel to fulfill this role considering the individuals competence, position, and ability. Where a person is identified as required to fulfill Site Safety Manager/Person in Charge Obligations, MPC Kinetic will formally appoint them by requesting in writing, following specific training on the function, obligations and support processes MPC Kinetic have established. The individual must also formally accept or decline this role. Where SSM is a role function, this will be communicated to individuals upon engagement or where positional changes occur. The individual SSM's are ensured the full support of MPC Kinetic.

The formal appointment and acceptance letter for each SSM is available upon request at site, and is available at the Roma Office upon request.

In the situation where a change of personnel occurs at site, the same expectations apply to SSM's as do all MPC Kinetic workers, a thorough handover must occur to communicate important matters including, but not limited to:

- QHSE (hazards, PPE, Emergency & safety equipment, training etc.)
- Operations status,
- Interactions between other operating plant / personnel
- Site Safety Manager Obligations

This may be documented on existing records available for the job i.e. the Pre-Job Safety Meeting (a triplicate document completed prior to works commencing), on the permit or JSA or a combination of the above mentioned.

Supporting Documentation:

- Training and Development Procedure (KIN-AOG-QHSE-PRO006-Training & Development Procedure)
- Internal Training – Site Safety Manager
- Site Safety Manager Appointment Form (KIN-AOG-QHSE-FRM016-Appointment of SSM)
- Operating Plant & Site Safety Manager Register (KIN-AOG-QHSE-REG009-Op.Plant & SSM Register)
- Position Descriptions
- QHSE Reporting Register (KIN-AOG-QHSE-REG007-QHSE Reporting Register)

5. RISK MANAGEMENT

Every effort must be made to identify all hazards associated with work activities to allow for effective risk management. All workers shall work in accordance with Australian risk management principles for the proposed work to be performed, including:

- Identify the hazard/s;
- Analyse the risk/s;
- Control the risk/s; and
- Monitor the control/s

The purpose of hazard identification, assessment and control is to minimize the likelihood of an incident occurring. The potential consequences of each hazard observation shall be assessed and a control strategy developed to eliminate the occurrence of the hazard, and/or minimize its effect to a level that is “As Low as Reasonably Practicable” (ALARP).

Selection of the Hazard Identification and assessment process may be by one or a combination of any of the following techniques:

- Workplace Inspections and / or site hazard hunt;
- Job Safety Analysis (JSA);
- Permit to Work process;
- Hazard analysis workshop;
- Using the Client’s ‘Life saving Rules’

MPC Kinetic maintain a Hazard Register which is a live document updated and reviewed in accordance with document control and record management processes, for cause or where other FMPS are obligated to. As risk management is not a one-off effort, rather a continual process requiring regular review to ensure the risk is managed to ALARP, it is preferred users access the electronic versions of risk management documentation from the Company server to ensure the latest version if being referenced and viewed. This register encompasses known and identified hazards pertaining to operations and business undertakings. This register is the platform for which hazards are controlled nominating various methods of the hierarchy of controls including, but not limited to:

- Training, awareness and development programs;
- Engineering and isolations;
- Administrative i.e. JSA’s, Permit’s, SOP’s
- Personal Protective Equipment (PPE)

Hazards associated with specific tasks shall be assessed consultatively using experienced personnel and personnel required to carry out the activity. The identified hazards are to be documented and alongside them possible risk, consequences, and control strategies noted in the Hazard Register.

Supporting Documentation:

- Hazard Register (KIN-AOG-QHSE-REG002- Risk Register)
- Risk Management Procedure (KIN-AOG-QHSE-PRO011-Risk Management Procedure)
- Job Safety Assessment & Risk Assessment (KIN-AOG-QHSE-FRM015-JSA & RA)
- Standard Operating Procedures (KIN-AOG-QHSE-FRM013-SOP)

5.1 Purchasing Risk Management

Risk Management principals extend into all aspects and areas of Business operations, including purchasing, hiring or leasing of goods. In the event MPC Kinetic personnel are required to partake in this activity, they are to:

- Ensure the QHSE requirements are clearly communicated to the supplier;
- Ensure QHSE resources identified meet the QHSE needs - i.e. ‘Right glove for the job’;
- Ensure goods are fit for the purpose intended;
- Ensure goods selected comply / meet relevant legislative requirements including Australian
- Standards and API standards with regards to importing, manufacturing, designing or supplying;
- Check that goods delivered conform to the original order requirements and all necessary documentation has been included;
- Activate the Management of Change process (as required) to ensure that a risk assessment of any goods has been undertaken with key stakeholders before purchase, hire or lease to minimise hazards likely to affect the safety of persons using, installing, decommissioning, operating, maintaining or inspecting the relevant goods;
- Consult with Operations Managers and QHSE personnel for advice as required.

When purchasing occurs, the responsibilities associated with Purchasing are performed by the individual. Purchasing should be done in the planning phase ensuring that the QHSE implementation of the companies Safety Management System.

Supporting Documentation:

- Procurement and Commissioning Procedure (KIN-AOG-QHSE-PRO007-Procurement & Commissioning Procedure)

6. INTERACTION WITH OPERATING PLANT OR PARTIES

It is expected that MPC Kinetic operations may interact with numerous parties and their respective operating plant at any given time. MPC Kinetic recognise that to ensure safe operations in these types of situations, the following shall be identified and managed including:

- Possible interactions
  - Well Services equipment and Client Infrastructure / Wellhead
  - Biocide unit and Client Infrastructure

- The risks of those interactions
- The controls required to manage potential risk
- Who will be responsible for specific activities; and
- Any additional requirements outside required by invested parties. Note, a MPC Kinetic / Client SMP Bridging document may be implemented to clarify this information.

The possible controls that MPC Kinetic will undertake are:

- Conduct a risk assessment and document, clearly the required controls to manage the risk/s posed on the Hazard Risk Register;
- Communicate the identified hazards and associated risk management systems established to all personnel required i.e. Toolbox meetings, Safety Meetings, formal SSM training;
- Provide training to ensure competent personnel are engaged at site interacting with operating plant i.e. SSM to manage MPC Kinetic interaction with plant from other companies
- Communicate additional Client requirements i.e. bridging document, etc.
- Participate in due diligence verification i.e. internal auditing, client pre-qualification, audits and inspections
- MPC Kinetic does not currently engage sub-contractors for operations. Where this changes, a risk assessment shall be conducted and the contractor pre-qualification process commenced.

Supporting Documentation:

- Hazard Risk Register (KIN-AOG-QHSE-REG002-Hazard Risk Register)
- Applicable Bridging documents
- MPC Kinetic Bridging Manual Template (KIN-AOG-QHSE-MAN004-QHSEBM)
- Job Safety Analysis (JSA) Suite
- JSA Register (KIN-AOG-QHSE-REG003-JSA Register)
- Standard Operating Procedure Suite
- SOP Register (KIN-AOG-QHSE-REG006-SOP Register)

7. SKILLS ASSESSMENT

Identifying of skills, knowledge and competence required for each MPC Kinetic worker to safely complete their tasks is determined using the MPC Kinetic Training Needs Analysis and managed using the Training Matrix. This process is conducted by the Management Team including QHSE and Training Managers and in consultation with the worker. The effectiveness of the TNA and training completed is reviewed during the annual KPI review. Factors contributing to skills and competency required include:

- Legislative and Regulatory obligations;
- Industry initiatives and best practice;
- Client standards and contractual requirements;

- Australian Standards; and
- Best practice set by MPC Kinetic in accordance with Company principles and goals.

Client training initiatives must be communicated in writing to MPC Kinetic (usually during the pre-qualification process), to enable suitable time and resources can be applied to fulfil this requirement. Competence and validity for personnel shall be recorded and managed using the Training Needs Matrix.

Statutory licenses for MPC Kinetic personnel to competently complete the scope of works contracted for include, but are not limited to:

- Driver's License (category applicable to role held);
- Crane and Hoist operations (CV and Dogging);
- Load shifting
- High Risk Licenses (LF – Forklift) as required.

Validity of licenses is managed using the Training Needs Matrix by MPC Kinetic Management.

Supporting Documentation:

- Training and Development Procedure (KIN-AOG-QHSE-PRO006 -Training & Development Procedure)
- MPC Kinetic Training Needs Matrix
- Operating Plant & Site Safety Manager Register (KIN-AOG-QHSE-REG009-Op.Plant & SSM Register)

8. TRAINING AND COMPETENCY

The ongoing training and development of all personnel irrespective of position, is central to the MPC Kinetic vision of providing an efficient organisation and workforce. Through training and development, MPC Kinetic hopes to assist employees to achieve personal achievement and development, job and career satisfaction and a Healthy and Safe work environment. Copies of all training and competencies pertaining to the workers role are kept on the respective personnel file and available for verifying of evidence as requested to the Roma Administrator or Management Team.

Mechanisms for imparting skills, knowledge, competence and experience for operational tasks is managed using a seniority system i.e. new and / or trainee operators are assigned to Senior Operators for practical application of training provided via the internal training platforms under supervision. Using the "buddy system" provides an excellent method of training delivery in a controlled and safe manner. Senior Operators are also trained in good practice of training principles to enable the "buddy system" to be an effective training tool.

Factors which may prompt a review in the training and competence levels required includes, but is not limited to:

- For cause i.e. Incident Investigation;
- Management of Change;
- New plant and / or equipment is introduced to the fleet;
- Regulatory or Client requested; and

- Rehabilitation and Return to Work cases

All safety critical training shall be conducted by a reputable and authorised Registered Training Organisation (RTO). Periodically, MPC Kinetic shall review the RTO's engaged to provide training in an effort to ensure a consistently high level of training is provided to our staff and shall seek feedback from course participants (workers) to verify our expectations. Action may be taken to ensure suitable RTO's are engaged.

Supporting Documentation:

- Training and Development Procedure (KIN-AOG-QHSE-PRO006-Training & Development Procedure)
- Verification Of Competency Form (KIN-AOG-QHSE-CHK005-VOC Checklist)

9. SAFETY STANDARDS AND OPERATING PROCEDURES

9.1 Safety Standards

MPC Kinetic maintain a library of information applicable to as reference for operations relevant to the State &/or Territory working within, including but not limited to:

- Australian & Industry Standards; and
- Legislation & Regulatory directives;

This information is used to provide direction with and achieving compliance and is available electronically on the Roma Server. MPC Kinetic conduct operations throughout Australia and New Zealand and recognise there may be differing regulatory standards applicable. The Company will make every effort to meet or exceed the prescribed standards.

Any deviations from the recommended practice prescribed within published documents shall prompt the management of change process including risk assessment.

Supporting Documentation:

- Legal Compliance Register (KIN-AOG-QHSE-REG001-Legal Compliance Register)

9.2 Standard Operating Procedure (SOP)

MPC Kinetic recognise that whilst risk management principles are a pillar for the foundation of managing a safe and healthy work environment, whilst Job Safety Analysis (JSA's) are an important part of the management system, they are a more effective tool when used in conjunction with more detailed procedural information. Standard Operating Procedures (SOP's) SOPs shall be prepared for all MPC Kinetic activities that are considered as standard or routine work. Periodically, a non-routine task or operation may require a SOP to be created to assist in the execution of a job or task in the safest manner possible and may also be used as a training tool. Site Supervisors / Senior Operators are responsible for ensuring that SOP's are followed at the site and are responsible for initiating the development of new SOP's (with assistance from the QHSE Specialist advice where required and the work party) as new tasks are introduced to the work sites. For new tasks for which SOP's do not exist, JSA's in conjunction with risk assessment methods shall be used as the initial basis to develop SOP's. The draft SOP's developed from this process shall include feedback and input from workers using the consultation process. All SOP's shall be reviewed by a suitable competent person before

management complete the final review and approve the document to be issued. All new SOP's are communicated to workers by a number of methods including safety meetings, email, pre-job meetings and informal training as required.

Each SOP must be checked for use and effectiveness and adopted if necessary to comply with changing legislation or types of plant used. The process used to develop an SOP is as follows:

- Job specific SOP's developed (via JSA and risk assessment methods) and approved by the relevant Supervisor.
- Job specific SOP's issued to the relevant Operator.
- Job specific SOP's further developed and reviewed by the Site Supervisor and work party.
- Changes or improvements made to SOP's.
- Approval and revision by Senior Management and reissue of SOP's.

Revisions of SOP's shall be conducted every three years as a minimum, or as required by changes to operations in accordance with the Document Control and Record Management Procedure. SOP's are 'live' documents, document control and latest versions are managed using the applicable process and the Roma Server. For any new activity or no routine / standard work a task specific JSA shall be used. The JSA must be contextualised to be site-specific.

Supporting Documentation:

- Standard Operating Procedure Register (KIN-AOG-REG006-SOP Register)
- Standard Operating Procedure (SOP) Suite

9.3 Permit to Work System

MPC Kinetic shall adopt and utilize the industry lead permit system utilized on Drilling and Completion sites. The permit system is to be used as an additional safe system and is not meant to replace the use of SOP's and/or JSA's. The objective of the permit system is to:

- Work in conjunction with best practice,
- Assist in the compliance with Legislation; and
- Interface with existing systems (MPC Kinetic QHSEMS)

All personnel required to operate under the current permit system shall be trained and competent for the role applicable to their position i.e. Work Party or Permit Holder for the Crew or Permit Authority for Senior Operator). At times the client PTW systems will be utilised instead of the WPTW system. MPC Kinetic personnel will require to be trained and authorised as detailed in the client PTW procedures. All work conducted while working under the client PTW system will be subject to the client SIMOP's requirements.

As it is an Australian legal document, emphasis shall be on accurate and detailed record keeping. Permits shall be archived for a minimum of three (3) months or twelve (12) months for confined space related work activities.

Supporting Documentation:

- Training Matrix

10. CONTROL SYSTEMS

Critical Isolation Points ensure the Operating Plant can be isolated in an emergency to minimise the escalation effects of a Major Accident Event (MAE) or significant process incident where Critical Isolation Points have been identified for use. Below are the critical isolation points within the Well Services and Wireline equipment associated with operations to try and prevent a MAE from occurring.

Safety critical Equipment (SCE) is another control system type which works in conjunction with other control systems to provide additional barriers and prevention on incidents occurring. All SCE shall be identifiable and managed using the Asset Register to ensure compliance and equipment is fit-for-purpose. Workers shall be trained in the use of SCE as applicable for example:

- Nationally accredited training (i.e. Working at Heights, Confined Space, Gas Monitoring);
- Verification of Competency in the use and maintenance of SCE (i.e. Rescue equipment, gas detectors)
- Additional guidance measures (SOP's, JSA's, OEM's)

Safety Control Systems (SRCs) form part of the control system of a machine that prevents a hazardous condition from occurring. It can be a separate dedicated system or it may be integrated with the normal machine control system. Its complexity will vary from a simple system, such as a guard door interlock switch and emergency stop switch connected in series to the control coil of power contactor, to a compound system comprising both simple and complex devices communicating through software and hardware. SRCs are designed to perform safety functions. The SRCs must continue to operate correctly under all foreseeable conditions.

Training in the safe operation, and maintenance of control systems is communicated using various documents including OEM's, SOP's and maintenance schedules.

10.1 Emergency Shut Down (ESD's)

An Emergency Shut-Down or ESD enables the vehicle / plant to be shut down quickly in the case of an emergent situation. Each MPC Kinetic vehicle or plant requiring an ESD has at least one (1) if not two (2) installed as is the case on Wireline Units, one (1) inside the vehicle and one (1) outside the vehicle. During the on-site Pre Job Safety Meeting, the MPC Kinetic crew will instruct the site personnel into the location and process to activate the ESD, before testing the ESD is functional.

ESD's shall be tested for effectiveness (activation times etc) and maintained during plant and vehicle maintenance activities. Vehicles are generally serviced every two-hundred and fifty hours (250 hours) by dedicated, competent MPC Kinetic workers. Confirmation of this maintenance is recorded and managed by the Workshop Manager.

10.2 Lubricator

A pressure-rated length of pipe, fitted to the top of a wellhead or Christmas tree so that tools may be put into a pressurised, or on occasion, non-pressurised well. Dependant on the pressure parameters received from the

well and considering the type of wireline (E-line or Slickline) and or well services operations being conducted would determine the pack-off assembly required for well control.

Supporting Documentation:

- Asset Register (KIN-AOG-QHSE-REG014-Asset Register)

11. PLANT AND EQUIPMENT

For risk management regarding plant and equipment purchasing or acquiring, refer to Section 5.1 Plant & Equipment Risk Management.

MPC Kinetic is certified in the National Heavy Vehicle Accreditation Scheme (NHVAS) for Maintenance. Senior Management shall maintain a Register of plant maintenance and provide access to the relevant training and safe use documentation for said plant and equipment such as OEM's, risk assessments, user manuals and SOP's. The Site Safety Managers should ensure they are both competent in the plant operated on site and confident the plant and equipment is adequately maintained in accordance with MPC Kinetic procedure, verifying using pre-start checks, ESD activation checks and any other method.

Plant and equipment is maintained in accordance with manufacturer recommendations. Where plant or equipment which is undergoing maintenance, or found to be faulty or in an unsafe condition, it shall be taken out of service and tagged appropriately, (i.e. tagged as "Dangerous", "Not for Use" or "Out of Service").

Operations Managers shall ensure that all plant and equipment is accompanied with Operating Instructions, Maintenance and Inspection records and that only qualified/competent persons operate, maintain and test such plant and equipment.

All plant and equipment shall only be used for its intended purpose i.e. Mobile plant shall not be used as a crane device unless it is legally certified to operate as such. The plant shall be inspected and found to meet the statutory requirements for performing the required lift. Mobile plant shall not be left raised with the controls unattended.

No item of mobile plant may operate within six meters of high voltage lines unless such lines have been isolated by the proper authority. Work shall then be carried out under the required Permit to Work conditions. Licensed mobile equipment shall be maintained in a safe, roadworthy condition and comply with local Road Traffic Authority requirements.

Supporting Documentation:

- Procurement & Commissioning Procedure (KIN-AOG-QHSE-PRO007-Procurement & Commissioning Procedure)
- Plant & Equipment Risk Assessment (KIN-AOG-QHSE-FRM022-P&E RA)
- NHVAS (Maintenance) Records
- Asset Register (KIN-AOG-QHSE-REG014-Asset Register)

12. EMERGENCY PREPAREDNESS AND RESPONSE

Whilst risk management principles are intended to prevent an emergency situation from occurring, resources must be available to manage an emergency situation should it happen. The MPC Kinetic Site Emergency Response Plan and Field Operations Emergency Response Plan details responsibilities, procedures, reporting requirements, training and the resources necessary to ensure effective and timely management of emergencies during MPC Kinetic operations.

The Emergency preparedness and Response procedure details the responsibilities, actions required and resources assigned to manage identified emergency situations for MPC Kinetic operations. This high level document is used to communicate relevant information to assist MPC Kinetic workers at site in the safe action and reaction in the event of an emergency situation. Detail of all potential emergencies identified include:

- Descriptions of potential scenarios i.e. loss of well control, medical emergency, security breach, trapped / missing people and road incidents;
- Site plan readily available;
- Response procedures for the potential scenarios;
- Procedure for safe evacuation including accounting for all workers & visitors;
- Roles and responsibilities in the execution of the plan;
- Training of relevant personnel within their roles including first response and use of emergency equipment i.e. Apply First Aid, CPR, Basic Fire-fighting;
- Training of the ERP including frequency of drills and emergency exercises;
- Processes to ensure the review of emergency procedures;
- Contingencies for incapacitation of emergency response personnel, communications and/or inaccessibility to the primary control centre (Roma Base);
- Emergency and rescue equipment including availability, maintenance and training in the safe use; and
- Emergency services personnel

The ERPs shall also be reviewed to ensure that it bridges adequately with the Client ERPs. Unless a well site handover has been conducted, MPC Kinetic personnel shall be under the relevant client ERP command plans. If a well site handover has been conducted and in the event of a well control incident the MPC Kinetic procedures will be used. Additionally technical support shall be given by the client's representatives.

The Emergency Response Plan shall be verified it is sufficient by conducting Emergency Response simulated drills in accordance with the Audit & Assurance Register and legislative obligations (twice yearly drill.) The outcome of this drill shall be recorded to assist in continual improvement and feedback from the stakeholders. Review of the document shall be conducted in accordance with the Document Control and Record Management Procedure every three (3) years, or more frequently as required i.e. post-incident, for-cause.

12.1 First Aid

Appropriate First Aid facilities are to be maintained by the Administration Manager within the Roma Yard. At site, MPC Kinetic shall maintain appropriate first aid kit/s, however a dedicated facility is not practicable due to the nature of terrain and operations. The Client may provide access to a first aid facility i.e. a first aid treatment room at site, however this is not always the case. As a minimum, two persons in each separate worksite shall hold a current senior first Aid certificate/qualification. Nominated first aiders shall be indicated on the site safety board and made aware to all site personnel via the Site Specific Induction. Where an assessment of a workplace identifies significant risk, additional trained first aid and/or medical personnel shall be provided as necessary.

The Administration Manager shall monitor supplies of first aid equipment and ensure all first aid boxes are sufficiently maintained. All MPC Kinetic vehicles shall carry an appropriate remote first aid kit. Site Supervisors shall record First Aid Treatments and use the First Aid Kit Check List for recording items required for replenishment of first aid kits.

All first aid treatments shall be entered into the incident register by the Site Supervisor and forwarded to MPC Kinetic Senior Management as soon as possible.

12.2 Fire Prevention

Adequate numbers and the correct type of fire extinguishers are available on site and are properly maintained. Workers are aware of general fire restrictions, the risk of ignition and the potential spread of fire throughout the various areas of the operation.

All vehicles, plant and equipment have appropriate fire extinguishers and are correctly maintained at six monthly intervals. Site Supervisors shall ensure that all personnel on site are aware of the location of all firefighting equipment and the correct use of the equipment.

Operations Managers shall ensure that there is documented evidence of employee training in the use of firefighting equipment and shall be responsible for conducting inspections as per the Audit and Inspection Schedule.

Supporting Documentation:

- Emergency Preparedness and Response Procedure (KIN-AOG-QHSE-PRO013-Emergency Preparedness & Response)
- Emergency Response Plan Field Operations (KIN-AOG-QHSE-MAP008-ERP Field Ops)
- Emergency Response Manual Base (KIN-AOG-QHSE-MAP013-ERP Base)
- Emergency Response Drill Report Form (KIN-AOG-QHSE-FRM007-ER Drill Report)
- First Aid Treatment Register (KIN-AOG-QHSE-FRM015-First Aid Treatment Register)

13. CONSULTATION AND COMMUNICATION

The purpose of the Communication and Consultation Procedure is to document the requirements for effective communication and consultation with internal and external stakeholders and provide guidelines to encourage participation in QHSE performance and improvement activities. Consultation in this context is not shared decision making. In fulfilling their commitment to continual improvement, MPC Kinetic promote effective, positive and open communication both internally and with external stakeholders as required.

All personnel shall:

- Actively participate in and contribute to any meetings i.e. toolbox and safety meetings, associated with QHSE in MPC Kinetic;
- Provide input or feedback on QHSE matters directly affecting their workplace or practices;
- Investigation findings, corrective actions and lessons learned to be raised and discussed at group forums / meetings;
- Report any deficiencies and provide any suggestions for improvement to a MPC Kinetic supervisor.
- Share QHSE learnings from across the industry and regulatory bodies;
- Report any new or changing risks to all relevant personnel;
- At site, ensure adequate and effective communications are present to allow for interactions between Office and Field personnel and, in the event of an emergency, allow for activation of the MPC Kinetic Emergency Response Plan and detail of the situation.

The QHSE Consultation & Communications Register captures correspondence received and sent, internal and external sharing and regulatory or industry updates received.

In the event a reporting event to a Regulatory body is required, the General Manager shall submit the information on behalf of the Company. All external communications shall be issued by the relevant management member.

Supporting Documentation:

- QHSE Consultation and Communication Procedure (KIN-AOG-QHSE-PRO005-Consultation & Communication Procedure)
- Consultation and Communication Register (KIN-AOG-QHSE-REG007-QHSE Reporting Register)

13.1 Management of Change

The MPC Kinetic Management of Change Procedure is designed to provide MPC Kinetic personnel with a consistent and effective method of controlling QHSE risk arising from change in the workplace. Change can impact on many areas, directly and indirectly, therefore, it is important there is a structured approach to implementing any change and identifying any areas which may require action as a result of that change. All personnel shall be trained in the QHSE Procedures & Planning Procedure and associated documentation to assist in recognising what change is and the requirement to instigate the MOC procedure to manage the risks associated.

Further detail is contained within the Management of Change Procedure.

Supporting Documentation:

- QHSE Procedures & Planning Procedure (KIN-AOG-QHSE-PRO004-Procedures & Planning Procedure)
- Management of Change (General) Form (KIN-AOG-QHSE-FRM005-MOC General Form
- Management of Change (Operational Procedures) Form (KIN-AOG-QHSE-FRM004-MOC Ops Procedure Form

MONITORING AND MEASUREMENT

An important part of any robust management system is the capturing and method of analysing the statistics, feedback, data and results determined through the use of the MPC Kinetic QHSEMS, formally known as the Measurement, Monitoring and Evaluation Process. This critical step contributes to the effectiveness of the QHSEMS for achieving continual improvement. There are numerous ways of executing this process including:

- Reporting – hazard & observation cards, regulatory and client required reporting;
- Incidents – determining the root cause and implementing preventative action/s;
- Audits and inspections – internal and external;
- Measurement of Key Performance Indicators and progress against Improvement Plans, Goals and Targets;
- Hours worked

MPC Kinetic recognise the importance of capturing this data and reiterate this to workers via numerous communication methods including toolbox and safety meetings, training and behavioral safety observation programs. The information captured is input into resource tools to assist in the analysing of data and provide statistical records determining QHSE performance, highlighting trends. The QHSE Manager is responsible for capturing, analysing and managing this information and providing updated QHSE performance to personnel on a regular basis.

The implementation of this HSEMP and likewise for any other QHSE associated manual or plan is a critical component determining the success of the documents intent. Planned communications, training and reviews shall be conducted

13.2 Audit and Inspections

The QHSE Advisors and Site Supervisors shall be responsible for conducting regular site inspections and checklists to ensure all operations comply with QHSE requirements. SSM’s should also conduct certain inspections to ensure they are discharging their legal obligations associated with the role.

Inspections and audits shall include (but is not limited) the following:

- Daily Start-Up Checklists
- Emergency Response Drill Reports
- First Aid Kit checks
- Measuring of the effectiveness of the MPC Kinetic QHSEMS

- Utilising the SafeOP for P&G Self-Audit Tool to determine compliance with legal obligations and this document, the HSEMP.

Internal audits are carried out of the QHSE System in accordance with the Internal Audit procedure. In addition, our clients carry out regular audits on an individual basis or as part of the JOOAP structure. MPC Kinetic shall comply with all client Assurance programs schedule. All action items arising from audits shall be managed via the company Event and Action Management Register and closed out accordingly. Communication of action items, including closed out items, arising from both internal and external audits to staff, will be via (but not limited to) tool box meeting, safety meeting, QHSE notice board and/or internal email system.

This QHSEMP shall be reviewed every three years, or as site specific requirements determine. Evaluation of conformance and effectiveness shall contribute to the company's annual goals and targets, (for example improvements plans, internal training programs and QHSE statistics).

Action items from these audits shall form the basis of MPC Kinetic commitment to continuous improvement with regard to QHSE issues. The audit process shall also ensure that operations comply with the requirements of the **Queensland Petroleum and Gas (Production and Safety) Act and Regulation 2004**.

Audits shall be conducted by competent personnel, appropriately trained in auditing techniques and able to objectively review and report findings. This is more challenging for smaller business or individual business units to achieve however, MPC Kinetic will compile an audit team from various areas of the business to enable objective perception. Improvements or actions required shall be managed using the event and action management register to implement and closeout.

Supporting Documentation:

- SafeOP for P&G Part B Self-Audit Tool (completed)
- Monthly QHSE Stats Form (KIN-AOG-QHSE-FRM009-Contractor Mthly QHSE Stats)
- QHSE Goals and Objectives Plan (KIN-AOG-QHSE-MAP006-Goals & Objectives Plan)
- Worksite Inspection (KIN-AOG-QHSE-CHK002-Site Inspection)
- Manager Field Inspection (KIN-AOG-QHSE-CHK001-Mgr. Field Inspection)
- Audit & Assurance Register (KIN-AOG-QHSE-REG011-Audit & Assurance Register)
- QHSE Reporting Register (KIN-AOG-QHSE-REG007-QHSE Reporting Register)
- Field and Third Party Audits.

14. KEY PERFORMANCE INDICATORS

No job is so important that it cannot be done safely. MPC Kinetic sets annual goals and objectives (KPI's) in accordance with the QHSE Procedures and Planning Procedure for both the Company and Workers. Although the preference is to focus on positive and preventative measures, the KPI's set are also influenced by the Industry and therefore, include both lead and lag indicators such as:

- Man hours vs. Incident statistics;
- Audit performance measures;

- Actions completed;
- Training conducted;
- Emergency Response Drills (as per the Audit & Assurance Procedure); and
- Systems / Procedure Reviews.

The KPI's, along with the QHSE Improvement Plan (QHSEIP), are reviewed quarterly or as soon as required. An annual safety report is produced in accordance with regulatory obligations, and reviews compliance against this HSEMP, identifies any major risk development and reports any hazard relating to future coal mining as applicable.

Supporting Documentation:

- QHSE Procedures & Planning Procedure (KIN-AOG-QHSE-PRO004-Procedures & Planning Procedure)
- QHSE Reporting Register (KIN-AOG-QHSE-REG007-QHSE Reporting Register)
- QHSE Improvement Plan (KIN-AOG-QHSE-MAP006-QHSEIP)

15. INCIDENT MANAGEMENT

All workers and visitors have an obligation to report all incidents to MPC Kinetic senior management that did, or could possibly have (near misses, high potential incidents) resulted in:

- Fatality;
- Injury/s;
- Property damage;
- Emergency Alarm activation other than as part of routine testing;
- A fire;
- An oil or gas leak;
- Illness; failures of this Safety Management Plan;
- Disease; and / or
- A dangerous event.

Where an incident occurs, the most senior person at the site shall restrict access to the incident area to prevent contamination and preserve the scene until the investigator/s arrive and commence proceedings.

15.1 Incident Investigation

All incidents shall be investigated, the format dependant on the incident risk classification by suitable competent personnel. All major incidents shall be thoroughly investigated (ICAM) by a trained and competent person / team. MPC Kinetic Senior Management shall investigate and report (as necessary) to client management and Government Regulatory Authorities depending on the nature and severity of the incident. It is crucial the investigator / team are competent to ensure the investigation process is followed to:

- Determine absent and failed defences which contributed to the incident occurring such as individual and team actions, task and environmental conditions and organisational factors;
- Clearly identify the corrective and preventative actions and recommendations that need to be managed to prevent recurrence, including responsible person's and expected timeframes;
- Share learnings with MPC Kinetic and the industry as determined.
- MPC Kinetic shall comply with the Schedule of Onshore Petroleum Exploration and Production Requirements for incident classification types and reporting times.

15.2 Reporting (Northern Territory)

The following reporting guidelines must be adhered to in conjunction with Schedule of Onshore Petroleum Exploration and Production Requirements Part II Safety and System Integrity Division 3 Reporting and in conjunction with GRP STD WHS 001 Incident Management Standard.

The guidelines are as follows

Reporting of death and serious injury

(1) In this Clause and this Schedule a serious injury is one which requires immediate attention by a medical practitioner.

(3) Where a person dies or suffers a serious injury:

(a) a report shall forthwith be made to the Minister; and

(b) a report in writing giving full particulars and all related circumstances shall be transmitted to the Minister as soon as practicable after the occurrence; and

(c) the above reports shall be in addition to, and not take precedence over, reports required by NT WorkSafe

Reporting serious damage other than environmental harm

(1) In this Clause and this Schedule serious damage to property means:

(a) the loss or destruction of property with a value exceeding $50,000;

(b) damage to property, the repair of which damage would cost an amount exceeding $50,000; or

(c) a loss, destruction or damage to any property by reason of which any person dies or suffers serious injury.

(2) Where serious damage to property occurs:

(a) a report of each occurrence shall forthwith be made to an Inspector; and

(b) a report in writing shall be submitted to the Minister as soon as practicable specifying:

(i) the date, time and place of such occurrence;

(ii) particulars of the damage;

(iii) the events so far as they are known or suspected that caused or contributed to the occurrence;

(iv) particulars of repairs carried out or proposed to be carried out to damaged property; and

(v) measures taken, or to be taken, to prevent a possible recurrence.

Reporting a potentially hazardous event

Where an event occurs which is not in the normal or ordinary course of a particular operation and which is professionally considered to have been likely to cause injury to a person or serious damage to property:
(1) a report of the event shall forthwith be made to an Inspector; and

(2) a report in writing of the event shall be submitted to the Minister as soon as practicable specifying measures taken or to be taken to prevent a possible recurrence.

Reporting damage other than environmental damage less than $50,000

Where damage to property occurs which is not serious damage to property but which results in a significant loss of structural integrity or load bearing capacity in the property damaged or results in some other significant unsafe condition:

(1) a report of the damage shall forthwith be made to the Minister; and

(2) a report in writing shall be submitted to the Minister as soon as practicable specifying measures taken or to be taken to prevent a possible recurrence

Reporting of emergencies

Any emergency shall be reported forthwith to the Minister without delay

15.3 Dangerous Event/Major Accident Events (MAE)

Dangerous Events or Major Accident Events (MAE), are defined within the MPC Kinetic Health Safety & Environment Management System. Wire line related MAEs are defined as any Wireline related Loss of Containment event that can lead to a serious permanent injury or a fatality; serious harm to the environment; or significant financial, commercial or regulatory impact. These events have major, critical or catastrophic consequences according to the MPC Kinetic Risk Matrix.

The identified hazards that could lead to a Loss of Containment of flammable gas or produced water and potentially MAE consequences. In these cases, controls have been implemented to reduce the risk posed by these hazards.

A number of (5) Major Accident Event's scenarios were identified for MPC Kinetic Operations:

- MAE 1: Subsurface: Loss of Containment of flammable gas
- MAE 2: Wellsite: Loss of Containment of flammable gas
- MAE 3: Wellsite: Loss of Containment of produced water
- MAE 4: Wellsite: Loss of Containment of toxic gas / liquids
- MAE 5: Wellsite: Loss of Containment of any other substance

Supporting Documentation:

- Incident Management Procedure (KIN-AOG-QHSE-PRO010-Incident Management Procedure)
- Incident and Hazard Notification Form (KIN-AOG-QHSE-FRM001-Event Notification Form)

- Incident Investigation Report (KIN-AOG-QHSE-FRM011-Incident Investigation Form)
- Investigation Report (KIN-AOG-QHSE-FRM031-Investigation Report)
- QHSE Bulletin (KIN-AOG-QHSE-FRM034-QHSE Bulletin)

16. RECORD MANAGEMENT

This document is a live document, managed using the standard Document Control and Record Management process applicable to all documentation and records within the MPC Kinetic QHSEMS. As such, it shall be reviewed in accordance with all policy and procedural reviews, undertaken every three (3) years or as operations, or regulatory obligations require, or where there is a change of risk level identified. Records of this, any subsequent Safety Management Plans and resulting records shall be archived in accordance with the procedure for seven (7) years. Examples of resulting records expected to be generated during operations includes:

- Formal safety (Risk) assessment
- Skills assessment (Training Needs Analysis)
- Training and Supervision records and program
- SOP application to operations
- Maintenance records
- Monitoring, reviewing and auditing of Policies and this document (QHSEMP)
- Investigations and review of actions involving the operating plant
- The testing and monitoring of control systems
- Other records pertaining to the safe operation of the MPC Kinetic operating plant in accordance with the Petroleum & Gas (Production Safety) Act.

This document may also be mapped against Client Bridging Documentation to enable clear responsibilities of duties. Where this is the case, both parties will share all relevant information as required to manage operations.

This document shall be made available to all workers through the server with a copy available with each piece of operating plant and to clients on request. MPC Kinetic Management is responsible for the review and revision of this document. This document shall also be used in the training of Site Safety Managers.

All documentation and records shall be managed in accordance with the Document Control and Record Management Procedure, including the availability of records applicable to operations such as compliance certificates, ERP, SSM Appointment Records and risk assessments.

Supporting Documentation:

- Document and Data Control Procedure (KIN-AOG-QHSE-PRO016 Information Management Procedure)
- QHSE Monthly Reports
- Document Control and Change Register (KIN-AOG-QHSE-REG008-Doc. Control & Change Register)

17. WHS ACT RELEVANT REQUIREMENTS (SAFETY SYSTEMS OF WORK)

MPC Kinetic has in place safe systems of work for key risk areas including:

17.1 Alcohol, Drugs, and Contraband

A “Zero Tolerance” to drug and alcohol shall apply to all MPC Kinetic field operations as per the Fitness for Work Procedure to ensure the Health, Safety and Welfare of all personnel is maintained. In accordance with the Fitness for Work Procedure, ongoing random screening and cause testing shall be implemented to ensure compliance. MPC Kinetic shall conduct mandatory drug testing for cause including, but not limited to:

- Post Incident
- For Cause
- Prior to returning to work after extended period of leave or post rehabilitation
- Randomly as required
- Client initiated testing
- Pre-Employment

MPC Kinetic workers shall be subject to all clients’ drug and alcohol testing and requirement schedule at site. Non-compliance with the Policy and Procedure may lead to serious disciplinary action or termination of employment.

Refusal to undertake requested testing is considered a breach of the Drug and Alcohol Policy and persons refusing to test shall be removed from site, shall be subject to counselling and/or further disciplinary action which may include termination of employment.

The presence of weapons at work or on-site is also prohibited and a “Zero Tolerance” shall apply to ensure the continued health, safety and welfare of all personnel as described in the Contraband Policy. Breach of this policy shall incur disciplinary action.

Supporting Documentation:

- Contraband Policy (KIN-AOG-POL005-Contraband Policy)
- Fitness for Work Procedure (KIN-AOG-QHSE-PRO015-Fitness for Work Procedure)

17.2 Chemical Management

MPC Kinetic shall apply the Hierarchy of Controls to chemicals used and stored, where possible, substituting hazardous substances for non-hazardous. MPC Kinetic shall maintain a register of all chemical substances including the relevant safety data sheets (SDS) and associated risk assessment (conducted for all hazardous chemicals). The SDS’s shall be available to all site personnel for review to ensure that correct chemical handling procedures and PPE requirements are being met. The register and associated SDS’s and Risk assessments shall be maintained by Operations Managers and QHSE personnel. Workers and Line Managers

are responsible for advising of any (proposed) changes or introduction of new chemicals. All chemicals shall be stored and disposed of in accordance with relevant government legislative requirements, Australian Standards and the manufacturers (SDS) instructions.

Supporting Documentation:

- Radiation Act 2005
- Radiation Regulations 2008
- Chemical Management SOP (KIN-AOG-QHSE-FRM013-SOP GN010 Chemical Substance Management)
- Chemical Substances Register (KIN-AOG-QHSE-REG004-Chemical Subs Register)
- Chemical Substance Risk Assessment (KIN-AOG-QHSE-FRM019-Chemical Substance RA)

17.3 Confined Spaces

As defined by the Confined Spaces Code of Practice 2011, a confined space is determined by the hazards associated with a set of specific circumstances and not just because work is performed in a small space. As per the WHS Regulation, Section5, A confined space means an enclosed space or partially enclosed space that:

- Is not designed or intended primarily to be occupied by a person; and
- Is, or is designed to be, at normal atmospheric pressure while any person is in the space; and
- Is or is likely to be a risk to health and safety from:
  - An atmosphere that does not have a safe oxygen level; or
  - Contaminants, including airborne gasses, vapours and dusts, that may cause injury from fire or explosion; or
  - Harmful concentrations of any airborne contaminants; or
  - Engulfment.

Workers shall determine if the work proposed includes entering or working within a confined space during job preparation. If determined entry and/or work within a confined space is required, the following control measures must be in place prior to any person's entering the confined space area:

- Assess the requirement to enter and work within the confined space and the number of workers required;
- Conduct a JSA specific to the confined space proposed thoroughly examining the hazards and associated risks for the task/s to be conducted within the confined space:
  - Assess the entry and exit to the confined space (access points, ladders, obstructions within etc.)
  - Assess harmful airborne contaminants (release of airborne contaminants, work performed within etc.)
  - Assess unsafe oxygen levels (19.5% - 23.5%)
  - Fire and explosion (ignition source, air and fuel capable of igniting, exceed 5% of its LEL)

  - Engulfment (swallowed up or immersed by material which may result in asphyxiation)
  - Other hazards i.e. uncontrolled of other substances (water/steam), biological hazards, mechanical hazards, electrical hazards, noise, manual tasks, radiation, environmental hazards, hazards outside the confined space (i.e. vehicle traffic), and additional physiological and psychological demands.
- Atmospheric testing and monitoring
- Complete a Permit (WPTW)
- Ensure rescue equipment including communication process, personnel and plan are readily available, and tested
- Ensure only trained and competent personnel are involved in this task
- Controls, isolations and barriers in place to eliminate or minimise the risk's posed by the identified hazards including entry and exit procedures, signage and barricading

Supporting Documentation:

- Confined Space Procedure (KIN-AOG-QHSE-PRO031-Confined Space Management Procedure)
- Enter and Work within Confined Space SOP GN001 Atmospheric Testing & Work in CS.
- Rescue Plan (KIN-AOG-QHSE-FRM018-Rescue Plan)
- JSA Suite
- WPTW Rev 3
- Emergency Preparedness & Response Procedure (KIN-AOG-QHSE-PRO013-Emergency Management Procedure)
- Emergency Response Plan (KIN-AOG-QHSE-MAP008-ERP)

17.4 Explosives

When operations require the use of explosives, all possible steps shall be taken to ensure that all requirements and government authorities are met, for the transportation, storage and use of explosives. Only trained and competent personnel are authorised to perform operations involving explosives, managed by MPC Kinetic training matrix.

MPC Kinetic has prepared specific documentation to manage explosives within the Explosives Transportation Security Plan and Explosives Safety Management Manual in accordance with the prescribed regulations and standards.

Supporting Documentation:

- Transport of Explosives By Road and Rail – 3rd Edition
- Explosives Act 2003
- Explosive Regulations 2005
- AS 2187 Explosives Storage, Transport and Use

- Explosives Safety and Security Plan (KIN-AOG-QHSE-MAP005-ESSP)

17.5 Fitness for Work / Fatigue Management

MPC Kinetic believes in providing support and early intervention into health and wellbeing issues. MPC Kinetic manage rosters in accordance with working time regulations and fitness for work and fatigue management procedures. Additionally, workers operating a fatigue-regulated heavy vehicle must also abide by the National Heavy Vehicle Law and not breach driving / work hours.

Workers are encouraged to advise management of any restriction that negatively impact their ability to perform their role safely including, but not limited to:

- Illness;
- Medication/s (over-the-counter or prescription medication);
- Fatigue;
- Personal matters which may disallow the persons mind to be on the job

Supporting Documentation:

- Fitness for Work Procedure (KIN-FMPS-QHSE-PRO010-Fitness for Work Procedure)
- Fatigue Management Procedure (KIN-AOG-QHSE-PRO019-Fatigue Management Procedure)

17.6 Hand Safety

The hand is one of the most complex parts of your body - the movement of the tendons, bones, tissues and nerves allows you to grip and do a wide variety of complex jobs. Without your hands, fingers and wrist it would be extremely difficult to do routine simple tasks, such as opening doors, using a fork, or tying your shoes, most injuries are serious, and can include including loss of fingers. The most common causes of hands, fingers and wrist Injuries are:

- Carelessness
- Lack of awareness
- Boredom
- Disregard for safety procedures
- Distractions

To avoid hand injuries, MPC Kinetic provides internal awareness training to workers including the following points:

- Know the hazards and dangers in the job to be done
- Be aware of pinch points
- Be aware of hot areas
- Be aware of rotating or moving surfaces

- Automated machinery may be controlled by remote control, or delayed timing devices that cause the machine to start automatically
- Loose clothing and jewelry may be caught up in moving machinery
- ***Never*** remove machine safeguards or operate machinery with safeguards removed.

Supporting Documentation:

- SOP Suite
- Manual Handling & Hand Safety Procedure (KIN-AOG-QHSE-PRO029-Manual Handling & Hand Safety Procedure)
- PPE & Noise Management Procedure (KIN-AOG-QHSE-PRO025-PPE Mgmt. Procedure)

17.7 Hammer Union Compatibility

MPC Kinetic use and interface with both 1502 and 602 hammer unions and as such recognise the potential significant risk demonstrated through industry incidents. Upon commencement of engagement, workers applicable shall be required to participate in a hammer union compatibility training awareness program. Additionally, workers are equipped with a hammer union gauge which allows the worker to check which rating the hammer union is and prevent incompatible make-ups.

Supporting Documentation:

- MPC Kinetic Hammer Union Internal Awareness Training
- Training Matrix

17.8 High Risk Construction Work

In accordance with WHS Regulation, whilst minimal, MPC Kinetic may perform tasks determined as high risk construction tasks such as, but not limited to:

- Rigging
- Scaffolding (+4m)
- Operate a forklift (within the MPC Kinetic Yard)

High risk tasks as mentioned require a specific high risk work license. The requirement and ongoing management of expiry are managed using the Training Matrix. Verification of Competency, as is the case for all licenses and certifications, is still required to be completed on individuals by a competent person.

Supporting Documentation:

- Training Matrix

17.9 Ignitions Sources

All client facilities have areas classified into hazardous and non-hazardous in accordance with AS/NZS 60079 – known as Hazardous Area Classification.

Ignition sources are identified through the Client Hazardous Area Classification processes and recorded to ensure that the electrical equipment installed is appropriate and certified for Hazardous Zones 0, 1 and 2. MPC Kinetic equipment operating in these areas will have the appropriate hazardous area certification.

Other types of ignition sources are controlled through the Wellsite Permit to Work System or appropriate client Permit to Work system which forces personnel to comply with additional safety requirements inside the Restricted Area by authorising equipment to be used.

Client site induction processes include information for all personnel entering these Restricted Areas to remove ignition sources from their person before entering.

17.10 Isolations

Isolation of energy sources is an important component of managing risks, shall be implemented in accordance with the MPC Kinetic Isolations Procedure and includes, but is not limited to:

- Machinery guarding;
- Operational controls are working and effective;
- Administrative controls i.e. WPTW Rev 3 system to be used on Drilling and Completions sites;
- Emergency shut-down / stops; and
- Warning devices

Supporting Documentation:

- Isolation Procedure (KIN-AOG-QHSE-PRO030-Isolations Procedure)

17.11 Lifting

MPC Kinetic operations involve regular lifting activities generally involving vehicle mounted cranes to lift equipment and elevated work platforms (boom type) to lift people to conducts works on elevated equipment (BOP etc.). Currently, MPC Kinetic hires equipment for man-riding (EWP) and uses a third party to conduct inspections and testing on lifting gear. A colour code system is used to ensure all MPC Kinetic lifting gear is checked and maintained to a high standard. Lifting equipment shall only be used for the purpose designed and within rated capacity of the equipment and operated as per manufacturer's instructions. MPC Kinetic conduct pre-start operational checks daily prior to first use. On-going maintenance and repairs shall be carried out by the owner (hirer) of the plant and managed using the Procurement and Commissioning Procedure.

Only qualified operators, who are trained and competent in the operation of the relevant equipment, shall be permitted to operate the equipment. Personnel who are responsible for rigging equipment for use with cranes or certified lifting equipment, shall be licensed Dogman or Riggers, unless the load is pre-slung, is fitted with a permanent lifting attachment, or using a truck/self-loading crane (HIAB).

When a HIAB has a lift rating greater than 10 tonnes the operator shall be suitably qualified.

Concealed loads shall be controlled by the use of an additional dogman, communicating with the Crane Operator by means of an appropriate hand held communication device.

At no time are loads to be lifted over personnel or personnel permitted to work beneath suspended loads.

During hoisting operations where a load requires control during the lift or has the potential to shift, with the potential of damaging equipment or causing injury to personnel, then the load shall be controlled by means of one or more ropes (tag lines). The requirement for the use of tag lines shall be assessed during the JHA analysis process and development of SOPs.

The Site Supervisor is responsible for ensuring that any critical lift risk assessments are performed, any SOPs are used and the relevant approvals obtained prior to such lifts commencing.

Any lift over 10 tonnes to be conducted over a wellhead using a crane requires a critical lifting study and shall be approved by MPC Kinetic Senior Management and the relevant Operating Company/Client that operations are being performed for.

Operations Managers shall be responsible that work requiring the use of a crane is in compliance with legislative requirements and relevant Australian standards. It's the responsibility of Operations Managers to confirm that only competent and qualified personnel are at the control of the crane.

It is the responsibility of Operations Managers to remove a crane from service when a defect is reported that affects the safe operation of the crane and exposes the operator or others to risk of injury or damage.

Trainees may operate load shifting or lifting equipment only if they complete a daily logbook, and are under the supervision of a person that holds the certification for the item of Plant the trainee is operating. Logbooks shall be signed off by the certified person at the completion of each operation.

Supporting Documentation:

- Lifting Management Procedure (KIN-AOG-QHSE-PRO027- Lifting Management Procedure)
- Procurement and Commissioning Procedure (KIN-AOG-QHSE-PRO07-Procurement & Commissioning Procedure)
- Asset Register (KIN-AOG-QHSE-REG014-Asset Register)

17.12 Lone / Isolated or Remote Work

Remote or isolated work means work that is isolated from the assistance of other persons because of the location, time or the nature of the work. Whilst Lone / Isolated Work is unusual within existing operations, MPC Kinetic recognise the increased risk associated with working in remote locations within a high risk industry. As such, risk management principals shall be applied where lone work is required. Controls to be in place prior to works commencing include:

- A system of work to manage the risks associated including:
- Effective communication
  - Provisions for rescue, medical assistance and the attendance of emergency service workers as required
  - Adequate (Initial) Emergency Response Equipment, considering potential delayed response times:
    i. First Aid Kit may include additional supplies including snake bite kit
    ii. Additional fire extinguishers

iii. Bushfire emergency response kit (fire blanket, additional water supplies)

iv. Additional vehicle critical equipment (extra spare tyre, etc)

– Designated check-in times with Office / Management

This may be developed using a risk assessment or JSA. All vehicles being used shall be checked prior to departure.

Supporting Documentation

- Lone, Isolated and Remote Work Procedure (KIN-AOG-QHSE-PRO022-Lone, Isolated & Remote Work Procedure)

17.13 Manual Handling

MPC Kinetic promote the use of mechanical lifting aids to move loads where possible. In order to prevent injuries associated with manual handling and where the use of mechanical aids is not practicable, MPC Kinetic shall provide training as required in positive manual handling techniques. The introduction of lifting equipment is controlled sing the Management of Change process and the ongoing maintenance shall be conducted in accordance with manufacturer's recommendations and the MPC Kinetic preventative maintenance schedule.

Supporting Documentation:

- Manual Handling Procedure (KIN-AOG-QHSE-PRO029-Manual Handling & Hand Safety Procedure)

17.14 Noise Management

The Company understand the risks associated with noise and the importance of managing this potentially harmful hazard including. Action taken in the management of hazardous noise include, but is not limited to:

- Procurement of fit-for-purpose plant and equipment
- Conduct audiometric testing in accordance with the audit and assurance schedule, or for-cause (post incident of injury sustained or environmental impact has occurred, as required)
- Providing suitable PPE for workers within noisy environments outside of the Company's control (i.e. rig)
- Training on hearing conservation
- Review regulatory requirements (Environmental Agreements – EA) and/or Client directives regarding the management of environmental noise.

Supporting Documentation:

- PPE Management Procedure (KIN-AOG-QHSE-PRO025-PPE Mgmt. Procedure)

17.15 Personal Protective Equipment (PPE)

MPC Kinetic shall supply the relevant PPE to ensure that tasks are able to be carried out safely. The relevant PPE shall be identified during JSA and risk assessments and shall be outlined in the relevant SWP for the particular task.

The minimum PPE whilst on any MPC Kinetic work site shall be:

- Long sleeve cotton shirts and long cotton trousers;
- Steel capped safety boots;
- Hard Hat (with shade brim for summer months);
- Safety Glasses;
- Hand Protection; and
- Hearing protection

Additional protective clothing or equipment shall be worn where required for specific tasks as defined by JHA's, SDS's and SOP's. These may include but are not limited to:

- Specialist Hand protection (e.g. nitrile gloves, welding glove, chemical glove)
- Radiation Dosimeter (as required)
- Face Shields
- Breathing apparatus
- Aprons
- Rubber gloves and/or boots
- Fall protection equipment

Failure to comply with safety warning, failure to use PPE or tampering with PPE and safety equipment shall lead to serious disciplinary action and the possibility to termination of employment.

Supporting Documentation:

- PPE Management Procedure (KIN-AOG-QHSE-PRO025-PPE & Noise Mgmt. Procedure)

17.16 Pressure Testing

Work involving pressure is considered high risk within the resources industry, however it is also a routine operation. Pressurised operations includes:

- equipment which is usually under pressure, may be under pressure, or any work involving pressurized operations;
- high-pressure, low volume operations;
- low-pressure, high volume operations;
- pressurizing and depressurizing

Suitable controls for the job / task to be done, must be implemented prior to any pressure operations commencing, including but not limited to:

- Toolbox meetings with all personnel involved in the job
- Review with crews any JSA / SOP's for pressures testing of particular equipment
- Open a permit for the pressure operations

- Ensure all controls are in place before work commences i.e. barricading & signage
- Ensure that all instruments and gauges are suitable for the expected pressure including fittings

Supporting Documentation:

- Safe Operating Procedures
- Pressure Management Procedure (KIN-AOG-QHSE-PRO021-Pressure Control Procedure)

17.17 Radiation Management

MPC Kinetic operations do not usually include radioactive materials, however the MPC Kinetic Logging Business Unit does & in the event operations overlap, MPC Kinetic shall manage the risk/s associated in accordance with regulatory and prescribed obligations as described within the Radiation Safety Protection Plan. Only trained, licensed and competent operators will be authorised to transport and handle the sources.

Upon arrival at site, the Lead Engineer / Senior Supervisor will advise the Rig Manager / OCR of their arrival and that they're carrying radioactive material/s. The MPC Kinetic crew shall set a suitable exclusion zone around the vehicle and communicate to all on-site personnel it is strictly a no-go zone for all personnel except MPC Kinetic crew. All handling and job preparation shall be conducted within this exclusion zone. Applicable job documentation such as JSA / SDS review and permits shall be completed and discussed prior to operations commencing.

Supporting Documentation:

- Radiation Act 2005
- Radiation Safety Regulation 2010
- Transport Operation (Road Use Management – Dangerous Goods) Regulation 2008
- Australian Standards
- Radiation Safety and Protection Plan (KIN-AOG-QHSE-MAP007-Radiation Safety & Protection Plan)

17.18 Registered Plant

MPC Kinetic operations involves the use of pressure vessels and in accordance with the WHS Regulation 2011 Section 5, some Company pressure equipment may be required to be registered. Reference to legislation and applicable Australian Standards is sought to determine the requirement and process to follow to ensure compliance. A register is maintained to manage the applicable registered pressure items.

Supporting Documentation:

- Asset Register (KIN-AOG-QHSE-REG014-Asset Register)

17.19 Road & Journey Safety

MPC Kinetic Fluid Management & Production Services uses Navman Wireless 3G as our In Vehicle Monitoring System (IVMS) and as part of Journey Management. The following vehicle conditions are tracked by the IVMS:

- 4WD is engaged.

- Speed of vehicle
- If Seat belt is worn.
- Location.

Reports are regularly checked by the Operations Managers who address any non-conformances regarding the above tracking. MPC Kinetic vehicles and trucks are fitted with communications equipment, emergency equipment and IVMS. Operations Managers are responsible for verifying that personnel required to drive vehicles hold the appropriate licences, have completed a nationally recognised 4WD training course (PMASUP236B), and have been issued with an IVMS passwords.

Drivers are responsible for ensuring that the vehicles under their control have adequate road maps for the area and are equipped for emergency response scenarios. Vehicles shall not be driven during the hours of darkness **unless** prior approval is obtained from the relevant Operations Manager. Vehicles carrying hazardous goods / explosives shall display clearly visible and correctly mounted signage.

MPC Kinetic employees are required to report in to the relevant Operations Manager when departing a location and their estimated time of arrival to the next location or Roma.

Supporting Documentation:

- Road & Journey Safety Procedure (KIN-AOG-QHSE-PRO017-Road & Journey Safety Procedure)
- Journey Management and Safe Driving Plan (KIN-AOG-QHSE-FRM030-JM & SDP)
- QHSE Reporting Register (KIN-AOG-QHSE-REG007-QHSE Reporting Register)

17.20 Third Party Management

MPC Kinetic does not currently engage contractors, however where this changes, the Company QHSEMS has processes in place to manage the risk/s involved including the Procurement and Commissioning Procedure. Contractors shall be assessed to determine risk (if any) posed, QHSE standards applicable and in place and any ongoing management requirements to ensure they meet or exceed the MPC Kinetic QHSE standards.

Supporting Documentation:

- Procurement and Commissioning Procedure (KIN-AOG-QHSE-PRO007-Procurement & Commissioning Procedure)
- Contractor Pre-Qualification Assessment (KIN-AOG-QHSE-FRM020-Contractor Pre-Qual Assessment)

17.21 Worker Rehabilitation

Whilst prevention is certainly a key priority, MPC Kinetic recognises that there are substantial benefits to be gained from implemented rehabilitation principles and practices and is therefore committed to ensuring that in the event a worker is injured, MPC Kinetic is adequately equipped in the successful and prompt rehabilitation. Positive execution of QHSE reporting will assist in the timely rehabilitation of workers as required.

We recognise that the Workers' Compensation and Rehabilitation Amendment Act 2013 and the Workers' Compensation and Rehabilitation Regulation 2014 provide the legislative support for workplace rehabilitation activities.

Supporting Documentation:

- Rehabilitation and Return to Work Policy (KIN-AOG-QHSE-POL006-Rehab & Return to Work Policy)
- Injury Management & Rehabilitation Procedure (KIN-AOG-QHSE-PRO023-Injury Mgmt. & Rehab Procedure)

17.22 Working at Heights & DROPS

MPC Kinetic aims to manage the requirement for its personnel to work at heights by applying the hierarchy of control to all operations where working at height is current or expected. Where possible, these activities shall be eliminated from operations and where this is not a practicable solution, the highest level of control should be applied to minimise the risk down to ALARP, including but not limited to:

- Conduct all working at height operations (where possible) from within edge protection of permanent or temporary platforms
- Where edge protection is not possible, a combination of a harness, shock absorber or lanyard and anchorage point to prevent a person from free falling
- All tools and equipment required for the elevated task/job shall be secured to a wrist strap or lanyard
- Equipment adheres to DROPS Industry best practice regarding primary fixings and secondary securing i.e. lifting equipment has split pins rather than nappy/spring pin or r-clip.
- Administrative controls in place i.e. Working at Heights Procedure, Pre-Start inspections, JSA, SOP & Permit
- Trained and competent personnel

Further detail is provided within the Working at Heights Procedure.

Supporting Documentation:

- Work at Height Procedure (KIN-AOG-QHSE-PRO026-Work at Height Procedure)
- DROPs Management Procedure (KIN-AOG-QHSE-PRO028-DROPs Mgmt. Procedure)
- Rescue Plan (KIN-AOG-QHSE-FRM027-Rescue Plan)
- Asset Register – Lifting (KIN-AOG-QHSE-REG014-Asset Register)

17.23 Working in Hot Conditions

The Company is attuned to the extreme weather conditions Australia is exposed to and shall manage the risk/s associated in accordance with the hierarchy of controls such as:

- Scheduling outdoor work activities during the morning or late afternoon;
- Mandatory refresher training conducted annually prior to the summer months;
- Additional PPE i.e. shade brims for hard hats;
- Regular breaks and rotation of personnel through cooled facilities;

- Communicating personal measures to assist in managing heat stress i.e. fitness for work, illness at work, acclimatisation etc.

Supporting Documentation:

- Fitness for Work Procedure (KIN-AOG-QHSE-PRO015-Fitness for Work Procedure)
- MPC Kinetic Working in Hot Conditions training

17.24 WHS Obligations – Supplier and Installer

MPC Kinetic Well Services may be considered as a 'supplier' and 'installer' for the installation of Frac Valves, under the Work Health Safety Act 2011 and as such understand the obligations and responsibilities placed upon this task. All due diligence is conducted as far as is reasonably practicable by the Company as detailed within the Procurement and Commissioning Procedure.

Supporting Documentation:

- Procurement and Commissioning Procedure (KIN-AOG-QHSE-PRO007-Procurement & Commissioning Procedure)
- API 6A Standard

17.25 Industry Initiatives and Requirements

Additional initiatives may be adopted by the Company as required and communicated to all relevant parties. Examples of this include agreed banned or restricted items such as nine (9) inch angle grinders, home-made tools or non-engineered tools, non-auto retracting blades and single-action load binders.

18. ENVIRONMENTAL MANAGEMENT

MPC Kinetic recognise the significance of proactive environmental protection and management, including the prescribed and regulatory obligations. The pillars of the Environmental Protection legislation applicable to MPC Kinetic Fluid Management & Production Services operations and activities are outlined below:

Environmental Management Pillar	Application to MPC Kinetic Fluid Management & Production Services Operations
1. Air Emissions	Nominally applicable
2. Biodiversity Protection	Nominally applicable
3. Environmental Aspects Identification	Applicable
4. Multiple Sites Management	Applicable
5. Noise Control	Nominally applicable
6. Resource Consumption	Nominally applicable
7. Soil and Groundwater Protection	Nominally applicable
8. Waste Management	Nominally applicable
9. Waste Water Management	Nominally applicable

Key roles and responsibilities pertaining Environmental Management practices are outlined within Section 3. Organisational Structure and Responsibilities.

18.1 Air Emissions

Whilst MPC Kinetic recognise the value of managing air emissions, the core business of providing Fluid Management and Well Testing services to the Resources Industry generate minimal air emissions i.e. operating a vehicle interfacing with a drilling or workover rig at site or conducting rig-less operations. Controls to assist in the comfort of workers within the workplace such as dust suppression are managed by the Client (Operating Company) to be conducted as required. MPC Kinetic report their compliance with Greenhouse Gas Emission reporting in accordance with the relevant legislation.

Changes to business operations and the associated risk is managed using the integrated QHSEMS therefore, in the event operations change, a review shall be conducted and the appropriate measures implemented to ensure adequate management or air emissions.

18.2 Biodiversity Protection (Flora and Fauna)

Activities on the environment is of utmost importance, therefore we are committed to minimising our impact. MPC Kinetic incorporate environmental management into the QHSE Management System. We commit to abiding by the relevant Client Environmental Management Plan conditions and shall review its plan against our existing controls to ensure consistency. Training is provided by way of induction, client induction and QHSE conversations relating to the importance of and good practices to abide by in relation to biodiversity protection.

All vehicles are subject to vehicle hygiene standards to prevent the spread of noxious weeds across operational areas. This requirement is usually communicated to MPC Kinetic during job pre-start conversations i.e. ERN, inductions etc.

MPC Kinetic have a number of trained and competent Weed Hygienists who shall ensure the vehicle/s have received the appropriate wash-down and inspection as required, as reflected on the documentation issued, which shall be kept within the vehicle for the valid certificate period / parameters or until a replacement certificate is issued / required. All records shall be managed in accordance with the Document Control and Record Management Procedure i.e. operational documents are archived for seven (7) years.

Supporting Documentation:

- Document Control and Record Management Procedure (KIN-AOG-QHSE-PRO016-Information Mgmt. Procedure)
- Environmental Management Procedure (KIN-AOG-QHSE-PRO018-Environmental Mgmt. Procedure)

18.3 Environmental Aspects Identification

Risk Management is an integral component of managing our QHSE obligations and regulatory requirements, including identifying environmental aspects and the management of the associated risk. MPC Kinetic shall utilise their integrated QHSE Management System to determine environmental aspects associated with operations. This shall be detailed on the Company Risk Profile and, where determined, managed using appropriate control including but not limited to:

- JHA’s

- Standard Operating Procedures
- Workplace Inspections and Checks

18.4 Multiple Sites Management

MPC Kinetic operates from a facility in Roma, located within the Surat Basin, Queensland, travelling to project sites as required. The sites attended are not owned by the Company, however some may be managed via the Clients handover process. Where this is the case, MPC Kinetic shall ensure operations are conducted in accordance with the Company QHSEMS (integrated management system of quality, health, safety and environmental aspects).

We shall comply with all reasonable requests, and site requirements as communicated by the Client &/or manager of the site in accordance with our QHSE obligations.

18.5 Noise Control

Noise control in relation to Environmental legislative obligations is managed under local council restrictions regarding town planning and suitable operating hours. The Company base is located in a designated industrial zoned area where impact on residential areas is not applicable. When working in field, they shall abide by the Clients reasonable requests with regard to managing noise e.g. work conducted between 0600 and 1800 with consideration given if operating in an area where 24-hour staff are residing and excessive noise is expected to be generated and the Client Environmental Authority (EA) noise criteria, as communicated by the Client to the Company.

18.6 Resource Consumption

Where possible, MPC Kinetic commit to recycling and reusing product in their effort to reduce waste generated by current operations and manage resource consumption in a positive manner. Management shall be involved in the monitoring and measurement of efforts, which includes, but is not limited to:

- Managing orders of supplies
- Regular stock-take of existing supplies
- Workplace inspections and checks
- Recycling services offered by local government

18.7 Soil and Groundwater Protection

All relevant workers are trained to safely clean up spills. This includes emergency service contact details, building evacuation team contacts and location of equipment and materials. Appropriate spill control equipment is cleaned, stored and maintained by qualified persons. MPC Kinetic trucks have spill control units that are maintained regularly.

MPC Kinetic core business activities of Fluid Management and Well Services, does not additionally negatively impact on the existing Wellsite prepared by the Operating Company.

18.8 Waste Management

Where possible, MPC Kinetic commit to recycling and reusing product in their effort to reduce waste generated by current operations. Our services do not currently generate large volumes of waste due to the nature of operations (i.e. we do not manufacture or generate).

MPC Kinetic does not create, transport or store regulated waste (in accordance with legislative definitions). We commit to environmental protection obligations and our obligation to lessening our environmental footprint. Waste generated is generally from servicing equipment and standard office environment. Management shall be involved in the monitoring and measurement of efforts, which includes, but is not limited to:

- Managing orders of supplies
- Regular stock-take of existing supplies
- Workplace inspections and checks
- Recycling services offered by local government

MPC Kinetic, where possible, employ the hierarchy of controls to eliminate or substitute hazardous chemicals. The management of hazardous material storage is minimised through:

- purchasing non-hazardous and environmentally friendly products where possible,
- the nature of our business (we do not store or sell bulk hazardous chemicals & materials)
- Training and direction in the safe handling, use & storage using manufacturer information (Safety data sheet etc.)

Supporting Documentation:

- Environmental Management Procedure (KIN-FMPS-QHSE-PRO015-Enviro. Mgmt. Procedure)

18.9 Waste Water Management

Current operations does not generate waste water. Changes to business operations and the associated risk is managed using the integrated QHSEMS therefore, in the event operations change, a review shall be conducted and the appropriate measures implemented to ensure adequate waste water management.

Supporting Documentation:

- Environmental Management Procedure (KIN-AOG-QHSE-PRO018-Environmental Mgmt. Procedure)
- Environmental Protection Act 1994
- Environmental Protection Regulation 2008
- Environmental Protection (Waste Management) Regulation 2000
- Waste Reduction and Recycling Act 2011
- Waste Reduction and Recycling Regulation 2011
- National Greenhouse and Energy Reporting Act 2007
- ISO:14001

- Site and Field ERPs
- Company Hazard Risk Register
- Applicable JSA's & SOP's

19. QUALITY

Whilst MPC Kinetic maintain an integrated Quality, Health, Safety and Environment Management System recognizing that all three (3) components interact and impact on each other for the successful and safe delivery of the Companies services. This document which includes prescriptive content and direction from:

- Work Health Safety Act;
- Work Health Safety Regulation;
- Petroleum and Gas (Production Safety) Act;
- Petroleum and Gas (Production Safety) Regulation;
- SafeOP tools;
- Environmental Protection Act; and
- Environmental Protection Regulation.

The Quality component is managed throughout operations seamlessly using integrated documentation and systems. For the benefit of adhering to ISO 9001:2015 and API Q2 standards, a separate Quality Manual is maintained and should be referenced in determining full quality management details of MPC Kinetic services.

Associated Documentation:

- Quality Management Plan (KIN-AOG-QHSE-MAP003-QMP)

20. LEGAL OBLIGATIONS AND REFERENCE LIBRARY

Legislation, regulatory and other references are consulted to ensure the Company is complying with all due obligations and our commitment for continual improvement. Change and updates are communicated to the Company via a number of methods including, but not limited to:

- Automatic subscriptions
- Industry information sharing (i.e. safety alerts, initiatives etc.)
- Regulatory newsletters

Legislation including the following, but is not limited to, is relevant to this QHSEMP:

- Australian and International Standards
- Petroleum & Gas Act 2004
- Schedule of Onshore Petroleum Exploration and Production Requirements
- NT Petroleum Act 1984

- Northern Territory Work Health and Safety (National Uniform Legislation Act) & Regulations
- Petroleum and Gas (Production and Safety) Act 2004 (QLD)
- Petroleum and Gas (Production and Safety) Regulation 2004 (QLD)
- Work Health and Safety Act 2011 (QLD)
- Work Health and Safety Regulation 2011(QLD)
- AS:4801 OHS Management System
- Electrical Safety Act 2002 (QLD)
- Electrical Safety Regulation 2013 (QLD)
- Environmental Protection Act 1994
- Environmental Protection Regulation 2008
- Environmental Protection (Waste Management) Regulation 2000
- Northern Territory Weeds Management Act & Regulations
- Waste Reduction and Recycling Act 2011
- Waste Reduction and Recycling Regulation 2011
- National Greenhouse and Energy Reporting Act 2007
- ISO:14001 (2015) Environmental Management Systems
- ISO:9001 (2015) Quality Management Systems
- ISO 31000 Risk Management Guidelines
- API Q2
- AS 2550.1 Cranes, Hoists and Winches
- AS2759 Steel Wire Rope – Use, Operations and Maintenance
- AS 3783 Pressure Equipment Operation and Management
- AS 3788 Pressure Equipment In-Service Inspection
- AS 4343 Pressure Equipment
- API 6A Specification for Wellhead and Christmas Tree Equipment
- Land Access Code of Practice 2011