Trion
Contractor HSER&S Minimum Requirements

Objectives:	Identify and communicate the minimum HSES&R requirements for managing Health, Safety, Environmental, Regulatory and Security risks within the Trion project that Contractors are required to adhere to, as per the scope of work or contract.
Audience:	Trion Project Team
Document Owner:	Chad Witten

Revision History

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Document Signatures

	Position Title	Name	Signature
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Approver	Project Director - Trion	Stephan Drouaud	Stephan Drouaud (May 25, 2023 14:52 CDT)

Change Log

Rev.	Section	Change Description
03	Contract scopes of work	Added reference to IOGP report 423 “HSE Management – Guidelines for Working Together in a Contract Environment” and added contacting mode, and new section for Company’s Mandatory HSE Requirements.
04	Document	Updated for Execution and Branding

Contents

1.0 PURPOSE

Identify and communicate the minimum HSES&R requirements for managing Health, Safety, Environmental, Regulatory and Security risks within the Trion project that Contractors are required to adhere to, as per the scope of work or contract.

This document will serve as a guiding reference for differentiating scopes of work with the intent to clearly identify required plans, deliverables, and overall expectations for Contractors.

These minimum requirements will serve as a reference to Contractors to address during the life cycle of the project.

2.0 SCOPE

All Trion contract activities as per the scope of work during the development of the Trion project including selection, definition, execution and installation phases.

Specific Mexico in country requirements are also referenced within this document but should not be considered all-inclusive.

Expectations for Contractor deliverables are outlined within this document.

Where a conflict exists between these requirements, Contractor's HSE-MS requirements, industry best-practice guidance and local regulatory laws, the most stringent requirement must be applied while always meeting regulatory requirements.

This documents primary focus is HSER&S strategic Contractor deliverables and processes during engineering, execution, and installation. HSE in design criteria or engineering specifications are not considered in these HSER&S Minimum Requirements.

3.0 CONTRACT SCOPES OF WORK

3.1 Contract Scenario Type

Below is an outline of possible contract scopes of work that apply to this document.

Contractor shall review its scope(s) of work and apply the HSER&S Minimum Requirements to their particular scope(s) of work. Contracts could represent one scope of work and one set of requirements at the start of a contract and change to another set of requirements later in the contract, Contractor is expected to understand and adhere to those changes as they occur.

***Example**: Engineering scope of work that moves into installation within a Company owned or leased area.*

***Clarification**: Contract Dependent Note* suggests that this/these requirements could be applied to the Contractor scope of work and shall be verified with the Company prior to contract award.

The Contractor will execute the Contract under the following Mode of contracting arrangements as defined in International Oil and Gas Producers (IOGP) report 423 "HSE Management – Guidelines for Working Together in a Contract Environment"

MODE of Contracting	Description	Scope Element
1	*Contractor provision people, processes and equipment. Company oversight, instructions, HSE management system.*	*All offshore scope post-handover; Offshore Hook-up and Commissioning*
2	*Contractor provision of people, processes and equipment. Contractor oversight, instructions, its own HSE management system and verification. Interfaces with Company HSE management system through a bridging document.*	*Offshore installation*
3	*Contractor provision of people, processes and equipment. Contractor oversight, instructions, HSE management system and verification. No interfaces with Company HSE management system.*	*EPCC; Global Fabrication Services*

3.2 Scopes of Work

1. Engineering Services Only (Front End Engineering or Detailed Design) – Mode 3
2. Global Fabrication Services (Vender Shops, Fabrication Yards, Specialized Manufacturing Services) – Mode 3
3. Mexico Construction Installation, Integration and Commissioning – Mode 1; Mode 2
4. Mexico Operations / Company Owned or Leased Area - Mode 1

4.0 HSER&S MINIMUM REQUIREMENTS BY SCOPE OF WORK

4.1 Engineering Services Only

(Front End Engineering or Detailed Design)

Contractor to apply the following sections to the contract and adhere to the requirements listed herein. Contract dependent notes will be verified by Contractor prior to contract award.

1. Contractor's HSE Management System
2. ***Contract Dependent Note:*** **HSER&S Plans**

Project HSER&S Plans can/could be requested as a contract deliverable and shall be verified with Company prior to contract award by the Contractor.

4.2 Global Fabrication Services

(Vender Shops, Fabrication Yards, Specialized Manufacturing Services)

Contractor to apply the following sections to the contract and adhere to the requirements listed herein.

1. Contractor's HSE Management System
2. Local International Regulations for HSER
3. IOGP International HSE Standards and Security Standards
4. ***Contract Dependent Note:*** HSER&S Plans

   Project HSER&S Plans can/could be requested as a contract deliverable and shall be verified with Company prior to contract award by the Contractor.

4.3 Mexico Construction Installation, Integration and Commissioning

Contractor to apply the following sections to the contract and adhere to the requirements listed here within.

1. Contractor's HSE Management System
2. Local International Regulations for HSER
3. IOGP International HSE Standards and Security Standards
4. ***Contract Dependent Note:*** HSER&S Plans

   Project HSER&S Plans can/could be requested as a contract deliverable and shall be verified with Company prior to contract award by the Contractor.
5. Mexico HSER Implementation and Bridging Plan
6. Mexico Specific Security Plan
7. Mexico Specific Regulatory Plan
8. Mexico Specific Environmental Plan

4.4 Mexico Operations / Company Owned or Leased Area

Contractor to apply the following sections to the contract and adhere to the requirements listed herein.

1. Contractor's HSE Management System
2. Company HSE Petroleum Controls Framework (Company Standards and Procedures)
3. Local International Regulations for HSER
4. IOGP International HSE Standards and Security Standards
5. ***Contract Dependent Note:*** HSER&S Plans

   Project HSER&S Plans can/could be requested as a contract deliverable and shall be verified with Company prior to contract award by the Contractor.
6. Mexico HSER Implementation and Bridging Plan
7. Mexico Specific Security Plan
8. Mexico Specific Regulatory Plan
9. Mexico Specific Environmental Plan

5.0 CONTRACTOR MINIMUM REQUIREMENTS DETAILED SECTIONS

Contractor shall submit for review and approval their HSE standards and procedures for project or contract. Sections required within the Contractor submittal must address at a minimum the following bulleted items; as per the risk profile for the contracted scope of work. Contractor HSE Management System shall meet or exceed Company/IOGP standards.

1. Contractor's HSE Management System

2. Company HSE Petroleum Controls Framework (Company Standards and Procedures)
3. Local International Regulations for HSE
4. IOGP International HSE Standards and Security Standards
5. ***Contract Dependent Note:*** HSER&S Plans

   Project HSER&S Plans can/could be requested as a contract deliverable and shall be verified with Company prior to contract award by the Contractor.
6. Mexico HSER Implementation and Bridging Plan
7. Mexico Specific Security Plan
8. Mexico Specific Regulatory Plan

   Mexico Specific Environmental Plan

6.0 CONTRACTOR'S HSE MANAGEMENT SYSTEM

Standards and Procedures

Contractor shall submit for review and approval their HSE standards and procedures for project or contract. Sections required within the Contractor submittal must address the major risks identified by the Contractor as per the execution methodology and at a minimum the following bulleted items. Contractor HSE Management System shall meet or exceed Company/ IOGP standards.

Administrative HSE

- Monthly HSER&S Report
- HSE Status Update (lagging and leading indicators)
- Project Workhours
- TRIF (1 million hours calculation)
- Recordable Injuries and Illnesses
- Environmental Event Summary
- Regulatory Event Summary
- Event Alert One Pager
- Event Investigation Report Template

Health

- Identify health hazards which have the potential to cause illness or injury via an activity-based risk assessment.
- Fitness for work program
- Fatigue management
- Medical case management
- Hearing conservation program
- Occupational exposure management
- Drug and alcohol program

Environmental

- Environment impact assessment
- Environmental management plan
- Waste Management Plan

Safety

- HSE Policy
- Identify safety hazards which have the potential to cause injury via an activity-based risk assessment
- Risk management process
- Management of Change
- Permit to work process
- Energy Isolation

- Confined Space
- Dropped Objects
- Lifting Program
- Vehicle Management (Light Duty and High Occupancy Vehicles)
- Mobile Equipment
- Working at heights
- Hazardous materials
- Job Risk Assessment Process (Task Specific)
- Working with pressure
- Sub-Contractor safety management process
- Behavioral based or management in action safety verification program

7.0 COMPANY CONTROLS REQUIRED

HSE Control Framework

Following the links provided to the required controls and HSE standards

HSE Controlled Documents (woodside.com)

8.0 LOCAL INTERNATIONAL REGULATIONS FOR HSER

Contractor shall comply with all local and provincial Health, Safety, Environmental and Regulatory compliance policies, regulations, and controls.

Contractor shall be able to always verify compliance with local HSER regulations to Company or regulatory agencies or body.

9.0 IOGP INTERNATIONAL STANDARDS

9.1 HSE

IOGP has established best practices and standardized minimum recommendations practices for the international construction and fabrication industry. These practices shall be used to shape and form HSE requirements and Management Systems to address safety risks associated with fatality potential or significant incident hazardous activities during fabrication and construction.

Please follow the provided links to the international IOGP HSE requirements

IOGP 459 - Life Saving Rules

IOGP 577 - Fabrication Site Construction Safety Recommended Practice – Hazardous Activities

IOGP 597 - Fabrication Site Construction Safety Recommended Practice – Enabling Activities

IOGP 423 – HSE Management Guidelines for Working together in a Contract Environment

Contractor is required to adhere to these IOGP practices.

9.2 Security

IOGP has established best practices for managing security risks within the global upstream oil and gas industry. These practices shall be used to shape and form Security plans during fabrication and construction.

Contractor is required to adhere to these IOGP practices.

10.0 PROJECT HSER&S PLANS

10.1 Managing Project HSER&S - Contract Deliverable

Contractor shall document the following via a Project HSER&S Plan that shall include as a minimum the following:

- HSE Overview
  - A description of how the Contractor's HSE Management System will be implemented.
  - A description of the overall Contractor and Subcontractor alignment regarding planning and execution of HSE on the project, with key integration points where applicable.
  - Explain how Contractor's HSE Management Plan is aligned and flows down to sub-contractors HSE Plans to ensure a consistent strategy.
- Organizational design of the HSE Structure for the specific contract scope of work
  - Organizational chart(s)
  - Resource curve for project HSE Resources aligned with project schedule
  - Role minimum specifications (requirements for roles, qualifications, approvals, language requirements).
  - Evaluate if technical translators will be required depending on site and location
  - Key position(s) cv(s) for review and approval by Company
    - HSE Director or Manager
    - HSE Superintendents or Supervisors

10.2 Safety Plan – Contract Deliverable

Contractor shall document the following via a Safety Management Plan that shall include as a minimum the following sections and shall apply to Contractor and all Contractor sub-contractors:

Risk management process

- Manage safety risks with a fatality potential or significant incident hazardous activities during fabrication and construction
- Implement safety risk controls, based on the assessment of the risks identified, using the hierarchy of controls (elimination, substitution, separation, engineering, administrative, personal protective equipment)

Management of Change

- The criteria for identifying the types of change that require an MOC.
- How to evaluate the impacts of a change, including requirements for risk assessments, which must involve people who understand the change and the risks associated with introducing the change.

Permit to work process

- Identify work activities that require a permit (including confined space entry, hot work, breaking containment of process systems containing hazardous materials, work on high voltage (more than 1000 volts).

Energy Isolation

- Identify sources of energy and hazardous materials that require isolation and implement an isolation system.

Confined Space

- Set criteria for a safe environment within the confined space and provide a rescue plan specific to the confined space conditions before entry.
- Assess and use respiratory protective equipment where a safe atmosphere cannot be established.
- Monitor, for the duration of the work activity, atmospheric contaminants and oxygen (including pre-entry) and personnel.

Dropped Objects

- Inspect and maintain the integrity of overhead structures near walkways and working areas.
- Separate and protect personnel from objects that have the potential to be dropped or fall from height.

Lifting Program

- Identify the activities that require a complex lift including lifting personnel, using multiple cranes and lifting over hazardous materials.
- Plan complex lifts and follow the plan.
- Install and operate lifting equipment on stable ground and use cranes with devices that detect the potential for overload.
- Separate and protect personnel from lifting equipment and loads.

Vehicle Management (Light Duty and High Occupancy Vehicles)

- Conduct risk assessments for light and high occupancy vehicle use
- Implement controls based on regional best practice and lessons learned
- Implement a site traffic management plan

Working at heights

- Provide a secure working area and maintain the structural integrity to bear the design load (including fixed walkways, platforms and mobile access platforms) where there is a potential to fall from one level to another.
- Use fall prevention or arrest systems if a secure working area cannot be established and provide a rescue plan specific to the activity before using fall arrest systems.

Working with pressure

- Implement controls to protect personnel from unanticipated pressure release during pressure testing and construction activities (e.g., exclusion zones, barriers, and pressure relief directed away from safe zones).

Mobile Equipment

- Install proximity detection equipment to alert the forklift operator that an object or pedestrian is approaching (e.g., active proximity detection, passive proximity detection and/or video analytics, with operator alarm/alert).
- Install visual and audible warning devices on mobile equipment to alert pedestrians of moving equipment (e.g., back-up alarms, reversing lights, side halo lights).
- Establish a positive communication process for interaction between mobile equipment operators and pedestrians (e.g., hand signals, 2-way radio communication) or other vehicle/mobile equipment operators.
- Maintain a minimum 15-ft. (5m) pedestrian exclusion zone around operating mobile equipment, using barricading tape (or similar) wherever practical. Consideration should be given to operational factors such as speed and confinement of area to determine the need for larger exclusion zones.
- Require mobile equipment operators to shut-down and de-energize mobile equipment whenever there has been a breach of segregation controls and report this to supervision.

Hazardous materials

- Identify chemicals in the workplace
- Collate Safety Data Sheets (SDS)
- Confirm Labelling Requirements
- Provide Information and Training
- Insure Hazard Communication

Other Risks

Contractors shall include description of any other hazards based on the method of executing the Work and identify mitigations and controls

Job Risk Assessment Process (Task Specific)

- Employ Job Risk Assessment (JRA) Approach
- Break Job Into Steps
- Identify the Hazards and Controls of Each Step
- Review

Subcontractors' Safety management process

- Specify a prequalification process for Subcontractors
- Subcontractor consistent HSE approach procedure (agreement letter from or with each Subcontractor)
- Contractor will be responsible for verifying that Subcontractors' employees are adequately trained and have the skills and knowledge to perform their assigned duties before the Work is performed.

Behavioral based or management in action safety verification program

- Quantifiable management engagement system (verifications, audits, leading safety conversations, etc.)

10.3 Health Plan – Contract Deliverable

Contractor shall document the following via a health plan that shall include as a minimum the following:

- Identify health hazards, which have the potential to cause illness or injury via an activity-based risk assessment.
- Fitness for work program
- Fatigue management
- Medical case management/ Site medical support and medical equipment
- Hearing conservation program
- Occupational exposure management
- Drug and alcohol program
- Pandemic management program

10.4 Environmental Plan – Contract Deliverable

Contractor shall document the following via an Environmental Management Plan that shall include as a minimum the following sections and shall apply to Contractor and all Contractor sub-contractors:

- Contractor is required to follow all locally applicable environmental regulations and requirements, including filing, and successfully acquiring federal, local, and municipal licensing and permits. In addition, Contractor will be familiar with and abide by Company policies and guidelines.
- Contractor is required to have and implement an Environmental Management System (EMS) or have a current ISO14001 certification.
- Register for the identification of all applicable environmental obligations
- Records, logs, and permits for all environmental activities and evidence of compliance and have them readily available for audits and government inspections.
- Waste management and waste disposal operations; tracking, reporting and final disposal as per federal, local and municipal regulation.

10.5 Regulatory Plan – Contract Deliverable

Contractor shall document the following via a Regulatory Plan that shall include as a minimum the following sections and shall apply to Contractor and all Contractor sub-contractors:

- Contractor is required to develop and implement a local regulatory plan and develop a register for the identification of legal and other obligations and define resources, roles, responsibilities and authorities for regulatory compliance

10.6 Security Plan – Contract Deliverable

Contractor shall document the following via a Security Management Plan that shall include as a minimum the following sections and shall apply to Contractor and all Contractor sub-contractors:

- Country Security Risk Assessment

- Country Risk Assessment Summary, Terrorism Risk and Threat, Crime, Travel Security Risk, Civil and Social Unrest, Natural Risks, Transportation Security Risk, Kidnapping Risk

- Site Security Risk Assessments
  - Shall be conducted for field and office locations and must include threat, criticality and vulnerability analysis to identify all security risks.
  - Should be updated yearly or after any activity that could change the level of threat
  - Should identify all security controls that shall be implemented
  - The following are key focused areas in our Site Security Risk Assessments:
    - Physical Security, Access control, Employee and Visitor Security, Vehicle Security, Material Security, Emergency Response, Crisis Communication

- Site Security Management Plan. The Plan shall include:
  - Safe Travel Management, Security Procedures in city, state relevant to business location, Access Control Procedures to include a system to track personnel on site or off site (e.g. electronic badging system or peg board), Adherence to the Voluntary Principals of Human Rights and Security, Information Security

- Journey Management Plan

  This document applies to all personnel and equipment movements within business location(s). It shall include:
  - Safe Journey Planning, Travel Guide (which provides travelers with location emergency and security information), Journey Locations and Journey Monitoring, Safe driving elements for Road Going and Light Vehicles, Reporting and Emergency Response arrangements during the Journey

11.0 COMPANY'S MANDATORY HSE REQUIREMENTS

Company's Mandatory Health and Safety and Environment requirements are set out as follows:

Contractor must involve the Company in activities undertaken in support of HSE including HSE meetings and workshops, hazard identification and risk assessment / mitigation plans, key decisions etc. Contractor should maintain a record and register of such Company involvement which includes role of individuals involved.

- The Company reserves the right to participate in and/or support investigations, workshops and/or audits. The Company may request, via the Company Representative, a copy of final investigation reports prepared by the Contractor.
- The Company may request, via the Company Representative, a copy of any HSE related documentation and communications detailing regulatory approval submissions, engagements, Regulatory Authorizations, inspection reports, improvement, or prohibition notices etc.
- Contractor must provide, run, and maintain a comprehensive behavioral based HSE program available for all personnel to participate in. Management, supervisors, and general workforce roles will need to be outlined in the program. Contractor shall notify the Company of the program's status during regular progress meetings.
- Contractor will be responsible for the implementation and maintenance of key performance indicators that will ensure management/supervisors clearly engage with the workforce to address the control of HSE hazards and risks.

Post Award HSE Meeting

After the Effective Date the Contractor must arrange and attend with Company a post award HSE Meeting to achieve the following:

- Ensure a common understanding of major HSE risks and controls
- Confirm details of key HSE activities to finalise the HSE Management Deliverables
- Confirm that HSE management interfaces between Company and Contractor are understood by both Company and Contractor
- Confirm that roles and responsibilities amongst Contractor and Company personnel are understood, including any participation by the Company in the Contractor's HSE management activities
- Confirm the HSE KPIs and benchmarks
- Include the distribution and explanation of relevant HSE policies, rules, standards, and procedures
- Confirm the scope and schedule of HSE meetings, audits, and reviews
- Confirm that HSE induction and training plans are in place
- Confirm that any pre-mobilization HSE activities and deliverables will be completed in a manner and timeframe consistent with the HSE Management Plan
- Confirm contact with third parties to ensure their role in emergency plans is known
- Confirm how subcontractor HSE will be managed
- Confirm the incident reporting and investigation procedures for the Contract and reporting timeframes to the Company.
- Confirm the process for agreeing upon, reporting, tracking, and closing out non-compliance.
- Confirm schedule and template for submission of HSE performance data; Company may request documentary evidence to support HSE performance reporting.

12.0 MEXICO SPECIFIC REQUIREMENTS

12.1 Mexico HSER&S Implementation and Bridging Plan - Contract Deliverable

This document shall be completed by Contractor and submitted to Company for review.

Contractor is required to document compliance with all Company standards and procedures and ensure compliance and implementation of required SASISOPA regulations and controls while conducting work in Mexico.

- Contractor is required to conduct a gap assessment of their HSEMS vs Mexico SASISOPA regulation and present all supporting documentation to Company when requested.
- Contractor is required to fulfill monthly tracking and reporting requirements as applicable per ASEA document "Guía que establece las bases y los criterios para la adopción y el establecimiento de indicadores para medir, evaluar y reportar el desempeño en Seguridad Industrial, Seguridad Operativa y protección al medio ambiente del Sector Hidrocarburos". Contractor shall present this information, including that of their sub-contractors directly

linked to Company operations, to Company on monthly basis during first 5 business days of the month in order to meet ASEA reporting obligations. These reports must be submitted to Company in Spanish using the government (ASEA) templates provided in the following link https://www.gob.mx/asea/acciones-y-programas/l3.

- Contractor shall have resources available to actively support Company with regulatory audits, inspections, and request for information.
- Please see attached example of the bridging process for reference that should be considered non-all inclusive of the possible requirements

12.2 Mexico Specific Security Plan – Contract Deliverable

Contractor shall submit for review and approval their Security Management Plan for project or contract. Sections required within the submittal are at a minimum the following bulleted items.

Threat, Vulnerability and Security Risk Assessment

- The operating environment and groups/events by which it is characterized
- The profile of the organization, the footprint and the social impact
- The strategic, long-term objectives of the organization
- Voluntary Principles of Security and Human Rights
- Capability and intent of local criminal or other threats
- Vulnerability and attractiveness of assets to criminal elements
- Availability of resources

Controls

- Physical protection measures (lights, fences, CCTV, barriers, etc.)
- Security procedures (ID checking, access control, vehicle screening)
- Intelligence networking (Local social/political leaders/intelligence providers, etc.)
- Resourcing (Security personnel, equipment, etc.)

Security Risk Register

- Ownership and management of security risks
- Overview of the significant security risk that are faced by the Contractor
- Record the results of threat/vulnerability security risk assessment
- Record proposed actions to improve the security profile
- Facilitate the prioritization of security risks

Emergency Plan and Resourcing

- Actions to take in an emergency
- Who activates the plan and when
- Coordination and communication protocols and process
- What resources are required and is it available

Execution and Control Activities

- The plan has identified all the security risks to the operation
- All control mechanisms are established

- The plan has been accordingly and appropriately resourced
- The plan has been effectively communicated to those with responsibility for its execution
- Assurance that those with responsibility for carrying out the plan have the correct competencies
- All correct back up and reinforcement strategies are established and tested

Monitor and Security Reporting

- Identify processes to monitor and report security events
- Incident Reporting and Investigation:
- Communication methods that enable reporting (Informal, ad hoc updates, scheduled reports)
- Documentation of effective controls or any remediation or actions to take

Ship Security Plan

Ship Security Plans (SSP) must be created for all Installations/drill ships and marine vessels to effectively prevent or respond to a security incident.

Note: Notwithstanding the requirements of this Subsection, International Ship and Port Facility Security (ISPS) Certified Installations must meet all requirements of the ISPS Code.

- SSPs should cover all stages of each incident from the time it is detected until it is over.
- SSPs must address measures to:
    - Prevent unauthorized possession or use of weapons, dangerous substances and devices
    - Prevent unauthorized access to the Installation
    - Identify restricted areas on the Installation and prevent unauthorized access
    - Procedures for interfacing with external party security activities
- SSPs must indicate the point at which response should be initiated and give guidance on the factors to consider in choosing courses of action including use of safe havens, external evacuation, and rescue and recovery services in specific circumstances. It should be concise, readable, and in a format which can be readily used for training, exercises, drills and/or actual emergencies.
    - In developing content, Contractor should consider risk analysis and ‘what if’ scenarios as appropriate to the operation.
    - SSPs are required to be secured and access controlled to prevent unauthorized access or disclosure.

Considerations

When developing SSPs the following must be considered where applicable:

- Must provide crew change logistics by air to include international and domestic airport transfer and land logistics, including ports and terminals. The logistic also must include crew changes by vessels if included in the logistics of the operations.
- Contact and establish relationships with host nation security and international agencies, for example, Embassy and Consulate Security, Medical Service Provider and local law enforcement or other emergency services
- Identify in-country security response resources for inclusion in SSPs
- Review of security assessments where applicable
- Complete a joint assessment with the Company to determine whether additional controls are required:

- During Installation moves

- When the Installation is to be physically connected to an offshore platform or facility
    - Where applicable, the threats and hazards identified in the SSAs

- Where the SSA identifies a threat of kidnap, the SSP must contain appropriate preventative and mitigating procedures and controls. These requirements can be provided by the CSO upon request.
    - Internal and external communications
    - Restricting communication from the Installation
    - Securing of the well, at all stages, in the event of a hostile boarding of the Installation

12.3 Mexico Specific Regulatory Plan – Contract Deliverable

Permits and Operational Compliance

- Contractor is required to follow all locally applicable regulations and requirements, including filing and successfully acquiring federal, local, and municipal licensing and permits. In addition, Contractor will be familiar with and abide by Company policy and guidelines including but not limited to the contractor management framework.
- Contractor shall assist Company in the preparation of applicable permits by providing equipment specifications, Company processes and procedures and all approved federal, local and municipal permits with the understanding that work may not commence until all the necessary government approvals are obtained.
- Contractor assistance shall include, but not be limited to, providing content for the initial application, all notices, reporting (periodic and final) and data delivery under regulatory requirements in both languages English and Spanish.

Subcontractors

- All subcontracts between Contractor and its Subcontractors and with their respective Subcontractors, agents and representatives, relating to any portion of the work shall contain covenants relating to national content, indemnity, insurance and safety, which are substantially similar, in all material respects, to those set forth in the MSA and CA.
- Contractor shall be responsible for verification that Subcontractors have written programs in place to comply with all applicable laws, rules, regulations, national certifications, governmental policies, including, but not limited to, the national content regulations and policies of the country and state where operations are conducted.

Compliance with Trion License and Trion JOA

- The Contractor shall acknowledge, review, and understand the obligations set forth in the Trion License and Trion JOA, and that it will, and will require all its employees, representatives, agents, and Subcontractors, performing any Work in Mexico, to comply with the obligations and provisions therein. The Trion License and Trion JOA are publicly available at the Mexican National Hydrocarbons Commission website.

Compliance with Laws

- Contractor shall comply with all Mexican regulations and standards provided by each government entity within the bounds of the Mexican hydrocarbon legislation per the Contractor/contract scope of work and activities.
- Contractor shall certify that, unless specifically exempted, all Equipment, Goods and/or Services furnished by Contractor Group have been manufactured, processed and delivered and all labor shall be performed in full conformance with all applicable Laws, including Anti-Corruption Laws.

Maritime Permits and Authorizations

- Contractor shall obtain Vessel Navigation Permits as required for offshore operations from respective Mexican Merchant Marine Authorities as well as all relevant MARPOL and SOLAS certifications as applicable.
- Contractor shall obtain all relevant Authorizations from Mexican Regulators including but not limited to:

  CONAGUA; SEMAR; SENER; PORT AUTHORITIES and CUSTOMS; SCT and SAT

12.4 Mexico Specific Environmental Plan – Contract Deliverable

- Contractor is required to have and implement an Environmental Management System (EMS) or have a current ISO14001 certification.
- Contractor's EMS framework shall be reviewed periodically and contain procedures and processes for the identification of baseline or reference conditions, area of influence and the type and extent of actual and reasonably foreseeable environmental impacts associated with contracted activities, considering cumulative impacts and impacts arising from climate change.
- Contractor shall develop a register for the identification of environmental obligations and define resources, roles, responsibilities, and authorities for environmental management. These individuals shall possess adequate environmental management competence and training.
- Keep accurate records, logs and permits for all environmental activities and have them readily available for audits and government inspections.
- Contractor is required to follow all locally applicable environmental regulations and requirements, including filing, and successfully acquiring federal, local, and municipal licensing and permits. In addition, Contractors will be familiar with and abide by Company policy and guidelines.
- Contractor shall be responsible for full compliance of waste disposal operations; tracking, reporting and final disposal as per federal, local, and municipal regulation.

Environmental Management Plan:

- Company will provide Contractor with a project-specific Environmental Management Plan and/or Environmental Impact Assessment (EIA), which will state Company and project environmental requirements, including conditions required by permits and approvals granted to Company.
- Contractor will demonstrate how it will comply with Company requirements by way of a Contractor Environmental Management Plan, which must be presented to Company prior to the commencement of Services for review and approval. The plan shall meet all regulatory requirements, assess the risk of the activities, identify actual or potential environmental impacts, and define controls.

Waste management

- Contractor must show in their Waste Management Plan that they have procedures and processes in place to:
  - Identify waste streams and types (including solid, liquid, and hazardous waste)
  - Reduce, reuse, and recycle waste where practicable, and responsibly dispose of each waste type where required,
  - Ensure adequate hazardous waste separation, containment, transportation, and disposal
  - Monitor greenhouse gas (GHG) emissions
- Contractor must demonstrate that final disposal locations and waste volumes have been documented.

TRION-00-BHP00-HX-STD-00001, Rev 04 - Trion Contractor HSER&S Minimum Requirements

Final Audit Report 2023-05-25

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