

Occupational Health and Safety Policy Statement

At Penspen, we are passionate about the Health, Safety and wellbeing of every employee. We are committed to providing, as far as reasonably practicable, a sustainable working environment that is safe and without risk to the health of all employees, contractors and others and strive to continually improve its health and safety performance through the effective implementation of this Policy. Whilst safe behaviour is ultimately the responsibility of each of us, Penspen will provide a safe and healthy workplace and will ensure that safety issues are incorporated in the planning and execution of the Company's businesses and activities therein. Penspen are a multi-discipline oil & gas business and operate across a range of environments, including some with serious health and safety risk.

- The Executive Committee, led by the Chief Executive Officer has overall responsibility for ensuring that we maintain high standards of health and safety. However, we rely on all of our employees and contractors to play their part in implementing our health and safety policy and drawing to our attention, areas in which we can improve.
- The Executive Committee and Executive Leadership Team collectively and individually provides leadership in health and safety matters and will consider health and safety matters when making decisions.
- Penspen has a comprehensive Occupational Health and Safety Management System (OHSMS) in full compliance with BS ISO 45001:2018.
- Establish and implement key health and safety objectives and monitor performance against those objectives.
- Identify the health and safety hazards arising from its business and assess and manage the associated risks to prevent injury and ill health to its employees, its contractors and members of the public.
- Penspen believes all injuries are preventable and strives for a Zero Harm working environment, however investigations into incidents which do occur shall be conducted to seek out root and underlying causes to improve risk management and prevent reoccurrence.
- Comply as a minimum with all health and safety legislation and associated codes of practice and co-operate fully with relevant enforcement agencies. The interest of other parties including local communities will also be considered.
- Provide direction, training and supervision to ensure that employees are aware of all health and safety issues relevant to their activities, as well as their role and responsibilities in implementing this policy both to work safely and with due consideration for the health and safety of others.
- Promote a positive health and safety culture within the organisation and ensure effective consulting and communication with employees, contractors and others on health and safety matters, directly and through elected representatives of employee safety.
- Penspen is committed to ensuring that the implementation of the health and safety management system is adequately resourced to enable the full implementation of this policy. This commitment includes the provision of sufficient financial resources,

management and employee time, training and health and safety advisory support. The company appoints a combination of internal and external specialists to provide competent health and safety advice.

- Develop and maintain effective emergency contingency plans, where appropriate, in conjunction with the authorities and emergency services.
- This policy will be made available to all such interested parties.

This Health and Safety Policy Statement and the Organisation and Arrangements that support it will be reviewed at least annually or more frequently where there have been significant changes to the company or the nature of the company's activities.

Signed



P O'Sullivan
Chief Executive Officer
Penspen Group Limited
Date: 20.01.2026