To minimize the impact of our operations on the natural environment, the company will proactively identify environmental hazards and risks, accurately report and appropriately investigate potential and actual environmental events, and implement protective and management measures as needed.

Critical Risk	Critical Controls
 DISEASE	• Spill Kit • Correct Storage • Safe Distances • Environmental detection devices

REQUIREMENTS

Air Quality Management and Controls

Where the risk assessment identifies potential environmental impacts to air quality, all facilities and business units shall develop and implement an Air Quality Management and Control objective. Each objective must address compliance with the company's corporate greenhouse gas (GHG) emissions objectives and site-specific regulatory requirements.

Implementation of these requirements shall be supported by procedures and templates provided in the Environmental Implementation Guidance, including the Air Emission Permit Matrix, fleet and fuel tracking logs, Volatile Organic Compound tracking forms, and inspection checklists.

The following environmental aspects are to be adhered to:

- Each facility that emits air pollutants from process components (e.g., process furnaces, heat-treating units, paint spray booths) is required to have the appropriate air permits and plans to ensure compliance.
- Fleet management records shall be maintained for all fossil-fuel-powered vehicles and equipment. These records must include inventory details such as engine model, year, type, serial number, engine tier classification, and any installed emission control devices.
- Where possible, fuel consumption, engine hours, and mileage shall be recorded for all fossil-fuel-powered vehicles and equipment, including owned, leased, and rented units, vehicles, drill rigs, and both mobile and portable equipment.
- Engine idling shall be restricted unless operation is necessary to provide essential safety controls, power, climate control, or fluid circulation.
- Where feasible, divisional offices shall track and document all business-related air travel mileage flown by personnel on commercial aircraft. Flight data may be accessed via the company's e-travel booking portal.

Paint Use and Volatile Organic Compound Control

The following requirements apply to painting operations and volatile organic compound management:

- All facilities shall obtain appropriate environmental permits for painting operations, as required by local regulations.
- The use of aerosol spray cans shall be minimized. High-volume low-pressure (HVLP) spray guns and engineered paint booths shall be used whenever feasible. Where permanent spray booths are not warranted, outsourcing to authorized vendors is preferred.
- The transition to low-Volatile Organic Compound and/or water-based paints shall be reviewed annually as part of the site's Risk Register or the Impacts and Aspects Register process.
- Volatile Organic Compound emissions associated with painting operations shall be tracked, and reduction efforts shall be documented and monitored.

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Energy Conservation

All business units and facilities shall establish and implement an energy conservation strategy that applies to buildings, vehicles, mobile, and portable equipment, and drill rigs, including leased and rented assets. The strategy shall document the annual consumption of electricity, natural gas, gasoline, diesel, and other fuels, as well as engine hours for all fossil-fuel-powered equipment.

Where feasible, sites must evaluate the use of alternative energy sources such as solar, wind, or geothermal. Each site's strategy must incorporate the company's corporate energy conservation goals.

Energy conservation strategies should also include initiatives that reduce environmental impact in daily operations, such as the use of LED lighting, automatic light timers, and other energy-efficient devices.

Water Quality Management

Where a risk assessment identifies the potential for environmental impacts on water resources, all facilities and operations shall develop a site-specific Water Management Strategy. This strategy shall address mitigation and control measures for impacts to both permanent and ephemeral water features, including dry streambeds and intermittent drainage paths.

At a minimum, the strategy shall include controls for:

- Stormwater impacts, documented through a site-specific Stormwater Pollution Prevention Plan (SWPPP) or equivalent.
- Effluents generated from vehicle and equipment maintenance, operation, storage, and wash areas.
- Discharges of process water into the environment, which must be permitted and monitored in accordance with local regulatory requirements.
- Vehicle and equipment wash systems, which shall be equipped with functioning oil-water separators.
- Site-wide measures to minimize impacts on stormwater quality through engineering controls and best management practices (BMPs).

Water Conservation

All facilities shall implement water conservation measures where feasible, prioritizing both operational efficiency and environmental stewardship.

Key actions may include:

- Implementing water use tracking systems to monitor consumption at the facility and job-site level.
- Identifying opportunities to reduce water usage through improved processes, recycling, or substitution.
- Evaluating and applying appropriate water conservation technologies, particularly at high-consumption sites or regions with water stress.

Waste Utility Tracking

All facilities and field operations shall develop and implement hazardous materials and waste management controls to prevent pollution, reduce environmental risk, and ensure compliance with applicable regulations.

Where feasible, the following requirements shall apply:

- Each facility shall annually inventory all hazardous materials and ensure that the details of these materials are included in the Hazardous Chemical Register. Some of the elements to be included the type of chemical, the packaging of the chemical, the number of units, the weight, and any other information as detailed in the register.
- Each facility and job site shall provide adequate and appropriate secondary containment for stored liquid hazardous materials (e.g., containment walls, double-walled tanks, spill pallets), in conformance with local regulations or recognized industry standards.

Waste and Hazardous Materials Management and Minimization

- Each facility shall maintain current Safety Data Sheets (SDSs) for all hazardous materials in inventory.
- Each facility shall annually reduce, where feasible, the volume stored and/or the number of hazardous substances on site.

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- Each facility and job site shall implement a comprehensive Spill Prevention, Control, and Countermeasure (SPCC) Plan to manage petroleum products and hazardous materials.
- Where hazardous materials pose a risk to stormwater resources, those risks shall be addressed through a dedicated Stormwater Management Plan or SWPPP. If no formal plan is required, a documented strategy must still be completed using the supporting tools in the Environmental Implementation Guidance.

These controls shall apply to, at a minimum, the following substances:

- Flammable liquids
- Fuels and lubricants
- Paints
- Petroleum solvents
- Reactive materials
- Rust inhibitors
- Toxic materials
- Cement
- Coolants
- Batteries
- Others, as appropriate

Hazardous Waste Management

All facilities and job sites generating hazardous waste shall:

- Comply with all applicable regulations regarding the classification, storage, handling, transportation, and disposal of hazardous waste.
- Use only licensed and authorized vendors for off-site disposal.
- Include hazardous waste reduction opportunities in the annual review of the Risk Register or Impacts and Aspects Register.

Tracking tools and documentation templates for hazardous waste and vendor compliance are available in the Environmental Implementation Guidance.

Prohibited Hazardous Substances

Chlorinated Solvents Restrictions

- Any usage, transport, possession or storage of chlorinated solvents on corporate property, vehicles or job sites are prohibited at the company.
- Violation of this standard will be considered a terminable offense.

Parts Washer Solvents Restrictions

- Petroleum-based parts washer solvents are prohibited.
- Environmentally benign solvents shall be defined as having an NFPA rating of 1-1-1 or lower and shall not have a petroleum content greater than 1%.

Waste Management Strategy

All business units, facilities, and job sites shall develop and implement a waste management strategy that tracks the generation, handling, and disposal of the following:

- Cuttings
- Drilling Wastes
- Formation waters
- Hazardous waste
- Petroleum-contaminated soils
- Pollution prevention
- Recycling
- Solid Waste
- Universal Wastes

Waste Minimization

Each facility shall implement a site-specific waste minimization program. At a minimum, the program must:

- Set measurable goals for reducing waste generation.
- Track performance against those goals annually.
- Include mandatory recycling of appropriate waste streams such as paper, metals, cardboard, used oil, batteries, and e-waste.

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Waste minimization initiatives must be documented in the site's Environmental Management Plan and aligned with site-specific risks identified in the Impacts and Aspects Register. Implementation shall be reviewed annually to ensure continuous improvement.

Land Use and Disturbance

Where a risk assessment identifies potential environmental impacts from the company activities beyond designated drill pads or access roads, a site-specific Land Use Strategy shall be developed and implemented. The strategy must aim to minimize disturbance to land, vegetation, and wildlife.

- Supervision must verify that all necessary land disturbance and utility clearance permits have been obtained by the client prior to initiating any field activities.
- Personnel shall not engage in land-disturbance activities beyond authorized boundaries without documented client approval and notification to the Regional EHST Manager.

Noise

Where a risk assessment identifies a potential environmental impact due to noise affecting off-site receptors (such as neighboring communities, sensitive wildlife habitats, or protected nesting areas), noise control measures shall be implemented to limit or mitigate those impacts.

Drilling operations must comply with all regulatory and client-specific noise limits at the project boundary and surrounding areas. Where applicable, company supervision must evaluate and mitigate operational noise to avoid complaints or exceedances.

Cultural & Historical Resources Protection

- Supervision must assess the potential for encountering cultural or historical resources during project planning and seek client guidance where necessary.
- Company personnel and contractors are strictly prohibited from disturbing, relocating, or removing any known cultural or historical resources located on project sites.

Cultural & Historical Resources Protection

- A Phase I Environmental Site Assessment (ESA) is required for all facilities where the company will enter into a lease, purchase, or lease termination agreement. The assessment must be performed by a qualified third party in accordance with ASTM E-1527-05 or the most recent applicable standard.
- A Phase II ESA and/or remediation may be required if there is evidence or suspicion of environmental contamination prior to transaction closure.
- For laydown areas on client-owned property, an environmental inspection must be conducted prior to mobilization and again during demobilization. Photos should be taken on both occasions. Written confirmation must be obtained from the client stating that the land is being returned in its current condition with no known environmental impacts resulting from company activities.

Spill Response and Reporting

Each facility and job site shall implement a comprehensive Spill Prevention, Control, and Countermeasure (SPCC) Plan to manage the handling, storage, and potential release of all petroleum products and liquid hazardous materials.

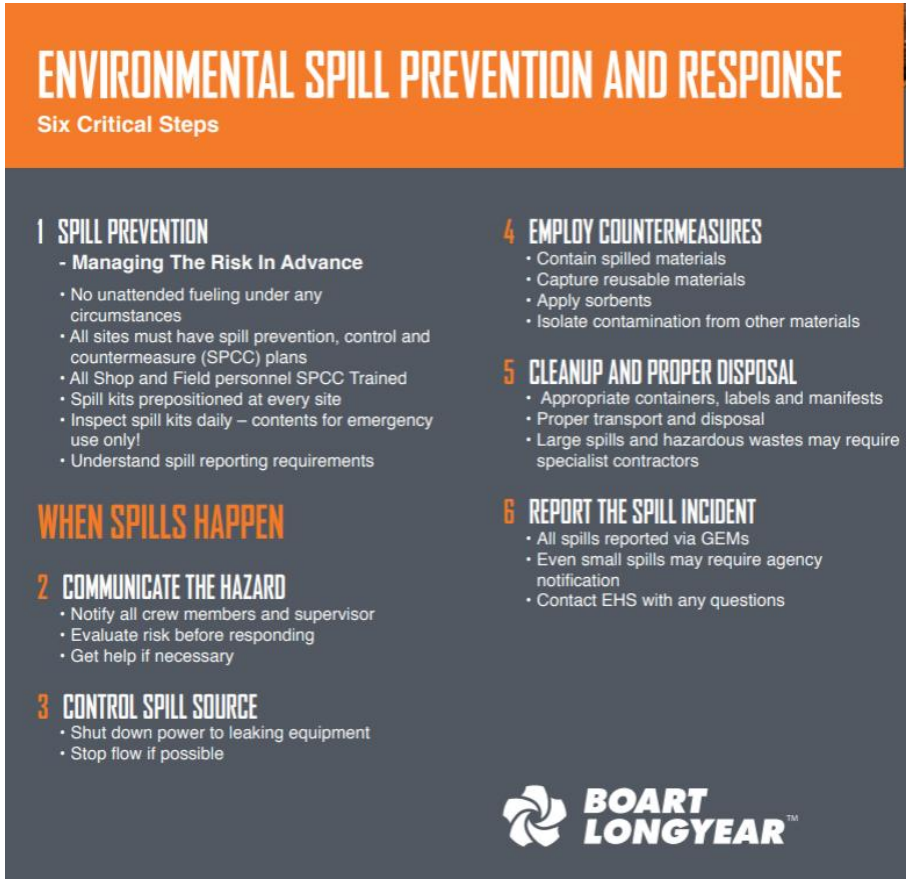
- Any spill or release of petroleum products or hazardous materials to a waterway must be reported immediately to appropriate authorities, client, the regional EHST Manager, and to the company EHST Director.
- Any releases of hydrocarbons or hazardous chemicals must be reported via GEMS, or the designated EHST management system, within 24 hours.
- All spills are to be remediated in conformance with local regulations, including recovery and/or excavation of all contaminated soils. Photos of before and after spills are to be taken and uploaded into GEMS.

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Spill Prevention and Response

The six steps to spill prevention and response are detailed below.



Inspection and Compliance

- All facilities shall conduct and document environmental inspections at least once per month. A facility inspection also qualifies as an environmental inspection.
- Standardized inspection checklists and corrective action tracking tools are available in GEMS.

Training Requirements

All new hires must complete mandatory environmental training, along with any role-specific environmental programs and safety plans applicable to their duties.

- At a minimum, all field, shop, and maintenance personnel shall receive annual training in the following environmental topics:
  - Environmental Management Program, including sustainability commitments.
  - Hazardous materials handling and awareness.
  - Spill prevention, control, and countermeasures (including spill response procedures and zero tolerance for unattended refueling).
  - Stormwater pollution prevention practices.
  - Waste management, including hazardous waste compliance for applicable sites.
  - Water resource management and conservation
  - Senior or designated members of Regional EHST teams should possess relevant environmental qualifications and demonstrate working knowledge of applicable regulations and best practices within their jurisdictions.

Recordkeeping

- Maintain a file of all environmental documents, either in electronic or hardcopy format as appropriate, and ensure it is protected from damage or loss.
- Regularly review environmental documentation to verify completeness and accuracy.
- Clearly document the close-out status of environmental actions, including the process followed and the current status of each item.
- Use company chosen platform to track environmental permit renewals, approvals, licenses, and related actions. Each entry must include the responsible individual, deadline, and relevant supporting documentation.

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