

BlackOak Energy LLC

Safety and Operational Excellence Policy

Approved by: Executive Leadership Team

Effective Date: January 1, 2025

1. Purpose

BlackOak Energy LLC ("the Company") is committed to upholding the highest standards of safety, environmental stewardship, and operational excellence. Through the disciplined application of the Operational Integrity Management System (OIMS), we aim to achieve zero injuries and incidents, prevent spills and environmental releases, and maintain a safe and healthy workplace for all employees and contractors.

2. Scope

This policy applies to all BlackOak Energy LLC employees, contractors, subcontractors, and visitors involved in or supporting any Company operations globally.

3. Our Commitment

BlackOak Energy LLC pledges to:

- Achieve Zero Injuries and Incidents: We aim for zero work-related injuries, occupational illnesses, and operational incidents by fostering a culture of personal responsibility and continuous vigilance.
- **Prevent Spills and Environmental Releases:** We rigorously manage environmental risks, implement controls to prevent spills, leaks, and emissions, and respond swiftly and effectively if incidents occur.
- Maintain a Safe and Healthy Work Environment: We ensure that our workplaces comply with all applicable health and safety laws and standards, proactively identify hazards, and promote wellbeing for employees and contractors.



4. Operational Integrity Management System (OIMS) Framework

Our commitment is operationalized through the structured application of OIMS, incorporating these core elements:

a. Leadership and Accountability

- Leaders demonstrate visible commitment to safety and operational integrity, setting clear expectations and ensuring resources are available.
- Accountability for safety and environmental performance is embedded at every level.

b. Risk Management

- Systematic identification, assessment, and control of risks related to health, safety, environment, and operations.
- Use of formal hazard analyses, permit-to-work systems, and proactive risk mitigation.

c. Competence, Training, and Awareness

- All personnel receive tailored training to perform their tasks safely and effectively, with regular refreshers and competency evaluations.
- Contractors are held to the same safety and integrity standards.

d. Management of Change (MOC)

• Changes to processes, equipment, or personnel are reviewed and controlled to prevent unintended consequences impacting safety or the environment.

e. Emergency Preparedness and Response

• Comprehensive emergency plans are maintained, tested, and continually improved to ensure rapid, effective response to incidents such as spills or workplace accidents.

f. Asset Integrity and Reliability

• Proactive inspection, maintenance, and monitoring programs are employed to ensure equipment and infrastructure operate safely and reliably, minimizing the risk of leaks or failures.

g. Communication and Consultation



• Open, transparent communication encourages hazard reporting, sharing of best practices, and engagement of all stakeholders, including contractors and communities.

h. Performance Monitoring and Continuous Improvement

- Use of leading and lagging indicators (e.g., injury rates, spill incidents, near misses) to evaluate and enhance safety and operational performance.
- Regular audits, investigations, and reviews drive corrective actions and preventive measures.

5. Key Focus Areas

Achieving Zero Injuries and Incidents

- Encourage a "Stop Work Authority" policy empowering everyone to halt unsafe work immediately.
- Promote hazard identification and risk mitigation through toolbox talks, safety meetings, and behavior-based safety programs.

Preventing Spills and Environmental Releases

- Implement strict controls on handling, storage, and transport of hazardous materials and hydrocarbons.
- Employ secondary containment, leak detection systems, and robust response procedures.
- Regularly train staff and contractors on environmental protection protocols.

Maintaining a Safe and Healthy Work Environment

- Ensure compliance with occupational health standards, including ergonomics, exposure limits, and mental health support.
- Provide necessary personal protective equipment (PPE) and enforce its proper use.
- Conduct regular workplace inspections and health monitoring.

6. Roles and Responsibilities

- Executive Leadership: Set safety and operational integrity priorities, allocate resources, and lead by example.
- Managers and Supervisors: Implement the policy, oversee risk management, and ensure team compliance.



- **Employees and Contractors:** Follow procedures, participate in training, report hazards or incidents, and contribute to a safety culture.
- **OIMS and Safety Teams:** Monitor performance, conduct audits, facilitate training, and promote continuous improvement.

7. Reporting and Accountability

- All incidents, near misses, hazards, and environmental concerns must be reported promptly.
- BlackOak Energy LLC enforces a non-retaliation policy to encourage open reporting.
- Violations of this policy may result in disciplinary action, including termination.

8. Policy Review

This policy will be reviewed at least annually or when necessary to reflect regulatory updates, operational changes, or lessons learned.