



DE NOVO SUSTAINABLE DEVELOPMENT POLICY

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I GENERAL INFORMATION

DENOVO

DeNovo is an energy company focused on meeting the energy needs of Trinidad and Tobago. DeNovo is the owner of Block I(a) located offshore in the west coast of Trinidad. DeNovo currently produces natural gas from the Iguana and Zandolie fields in Block I(a) from four (4) shallow water wells with two (2) unmanned platforms and a 45km pipeline to DeNovo's Gas Processing Unit which is located onshore.

WINNING STATEMENT

We make a difference by safely, rapidly, and efficiently developing and operating greenfield and brownfield assets utilizing green technologies and automated processes (designed and built to industry standards) in order to deliver competitive energy molecules, all done through highly enrolled and empowered DeNovians.

2 PURPOSE

DeNovo is committed to the long-term supply of energy and feedstock gas to Trinidad's Pt Lisas Industrial Estate where it is converted to petrochemicals critical to the global economy. As a responsible operator, we strive to do this whilst positively impacting the communities where we operate and minimizing impacts to the local and global environment, which we all share. This document outlines our philosophy and commitment to the continuous improvement of environmental, social and governance impacts as we operate our business. This includes ongoing initiatives to reduce the greenhouse gas footprint of our operations and their associated downstream products.

From day 1 we have striven to build DeNovo on the foundations of our five core values and guiding principles, which are, and which will always remain, Integrity, Fairness, Respect, Safety, and Innovation in all that we do.

The policies outlined here are intended to guide business strategy and operations throughout our organisation and are aligned with the UN Sustainable Development Goals (1).

3 BUSINESS CONTEXT

DeNovo is a Trinidad and Tobago energy company focused on monetising proven natural gas reserves for use in the petrochemical sector. DeNovo supplies gas to the Pt Lisas Industrial Estate in West Trinidad from its two offshore gas fields in Block 1a in the Gulf of Paria, some 45km offshore from the Pt Lisas Industrial Estate. These fields were considered marginally economic since their initial discovery in 1962.

Our innovative approach of using small, conductor supported unmanned platforms along with agile project management systems transformed the commercial prospects of these gas pools and provided a welcome source of additional feedstock to the supply-constrained Pt Lisas Industrial estate. The 80 MMSCFD Iguana platform delivered first gas in November 2018, a mere 33 months after DeNovo acquired the acreage. The 40 MMSCFD Zandolie platform was brought online mid-2022, backfilling Iguana's supply to the 90 MMSCFD onshore gas processing unit (GPU).

DeNovo is the only supplier with a pipeline feeding directly from the Gulf of Paria into the Pt Lisas Industrial estate, and our capacity represents almost 10% of the estate's 1 BCFD daily gas demand for petrochemicals. DeNovo is actively seeking opportunities to expand its gas asset base and is also evaluating opportunities and technologies for reducing the carbon intensity of energy feedstock provided to downstream chemical plants.

DeNovo values low impact environmental development and maximizing the local content of our operations. This is expressed in the small footprint and unmanned operations of our offshore facilities, with our second Zandolie platform

being 100% locally fabricated and 100% powered by wind and solar energy, to our onshore gas processing unit that has an enclosed ground flare for emergency flaring to minimize heat radiation and noise to nearby communities.

The field development and its ongoing operations is very much a Trinidad led initiative. Over 99% of DeNovo's employees and contractors are Trinidad and Tobago nationals, from the board of directors to plant operators and technicians. Since commencing gas production on our first field, Iguana, in November 2018, DeNovo has demonstrated safe and reliable operations with an uptime of 99.8%.

DeNovo is majority owned by Proman.

Proman AG is an integrated industrial group and global leader in natural gas derived products and services. Headquartered in Switzerland, with assets in the United States, Trinidad and Oman, and ongoing expansion into Mexico, Canada, and the United Arab Emirates (UAE). Proman is the world's second largest methanol producer and has extensive experience in petrochemical plant operations, petrochemical and power plant construction, product marketing and logistics, and project management. Proman has been one of the largest investors in Trinidad and Tobago's energy sector for over 35 years, expanding its portfolio to include methanol, anhydrous ammonia, urea ammonium nitrate and melamine. Proman was one of the first major investors in DeNovo and is the majority owner. Proman is committed to developing sustainable methanol and ammonia globally as cleaner alternatives to fossil fuels, offering a pathway to drastically cutting emissions in power generation, overland transportation, shipping, and industry. www.proman.org

4 GOVERNANCE & BUSINESS ETHICS

4.1 GOVERNANCE

Policy 1.1 Governance of Sustainable Business Practices at DeNovo:

DeNovo's leadership adhere to the UN Global Compact's Ten Principles (2) which provide guiding principles on human rights, labour practices, the environment, and anti-corruption.

All sustainable development issues that are important to DeNovo's stakeholders and our business will be managed throughout our organization using DeNovo's well established **DeNovo Operating Management System (DOMS)** with the most significant risks having oversight at the level of the Board of Directors. Sustainable business practices address potential and actual social impacts to DeNovo's stakeholders, including employees, fence-line communities, climate-change impacts and opportunities, and ethical business practices.

Governance of these items means the system of policies, practice standards and procedures we use to evaluate risks, plan, manage, execute, measure, audit and report on issues that are important to DeNovo, Proman, and our stakeholders. Important sustainability and climate change related issues will now be reported in line with internationally recognized standards, similar to our annual cycle of financial reporting, and will be shared with external stakeholders. Our sustainability reporting is captured by our majority stakeholder, Proman's Annual Sustainability report and all other local guidelines and laws are adhered to.

Sustainable Governance Strategy

1. Annual evaluation of materiality (importance) of issues with input from stakeholders.
2. Review and update ESG policy, strategy and execution plans.
3. Implementation of sustainable development strategy and plans.
4. Measurement of outcomes via collection of data and tracking of metrics.
5. Annual reporting and auditing of material sustainability issues.

4.2 ETHICAL BUSINESS PRACTICE AND PREVENTING CORRUPTION

Policy 1.2 Ethical Business Practice and Prevention of Corruption

- a) DeNovo has a Zero Tolerance Approach to Bribery and Corruption in all of its various forms and is committed to conducting our business in an honest and ethical manner.
- b) We strive at all times to align with international best practice for combatting corruption.

Anti-Corruption Strategy

DeNovo has developed a Counter Corruption Policy and **Code of Conduct** which informs directors, board members and employees, including business partners and agents, on what is expected regarding ethical behaviour, corruption, and compliance with the rule of law when undertaking business that involves DeNovo. In addition, DeNovo is evaluating new opportunities in Venezuela and have initiated DeNovo's **Integrity and Compliance Programme for Venezuela (V-ICP)**.

All directors, board members and employees, including business partners and agents, must read, respect, and act in compliance with DeNovo's Code of Conduct and Integrity Compliance Programme for Venezuela. Both the Code of Conduct and the Integrity Compliance Programme for Venezuela apply to all of DeNovo's operations, not just those in Venezuela.

DeNovo supports the Extractive Industries Transparency Initiatives ('EITI') and adheres to the EITI's 9 Expectations (3) which address transparency of payments to governments and their representatives. Adherence to the 9 expectations is audited by EITI DeNovo will adopt the transparency initiatives of similar bodies in jurisdictions where we operate where the EITI has not been adopted.

5 CLIMATE CHANGE AND ENERGY

5.1 CLIMATE RISK AND OPPORTUNITIES

DeNovo's Position on Climate Change and the Energy Transition:

The International Energy Agency ('IEA') has developed an aggressive roadmap for the energy sector in order to attain Net Zero Green House Gas (GHG) Emissions by 2050 (4), which would exceed the Paris agreement's commitment for less than 2°C temperature increase from pre-industrial levels by 2050. Almost 200 nations have committed to the IEA road map and is in line with the ambition to "pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels" (5).

Th IEA's plan still has natural gas as part of the energy mix in 2050 albeit, reduced by 50% from present demand levels. It is likely thus that there will be a demand for gas in Trinidad and Tobago in 2050. Net Zero can be achieved by combining gas supply with carbon capture and sequestration (CCS) to minimize the GHG impact of the natural gas, widespread "green" electrification of industrial processes, in particular for hydrogen-based chemicals production such as ammonia and methanol, powered by aggressive growth in low-cost renewable energy.

Climate change associated risks and opportunities will impact the energy sector as the world transitions to lower carbon energy sources, transportation fuels and industrial chemical production over the next few decades. This will also impact the downstream chemicals industry in Trinidad that DeNovo supplies with feedstock and fuel via natural gas. For example, the EU, one of the largest global chemicals markets, has already enacted carbon tax based on the GHG footprint of imported goods (6) with substantial implications for any ammonia and methanol chemicals imported from Trinidad and Tobago.

DeNovo views the energy transition as an opportunity to expand the product range we provide to the downstream chemicals sector, via renewable energy and captured CO2 sequestration. DeNovo also believes that natural gas will still be in demand by the downstream chemicals sector in Trinidad and Tobago by 2050.

Policy 2.1 Climate Change and Energy Transition Opportunities:

DeNovo will work closely with Proman to evaluate and enact technically and financially feasible strategies to reduce the overall Carbon Intensity measured using globally accredited measurement processes of the energy and feedstock supplied by DeNovo to Proman's chemical plants in Trinidad. Reducing the Carbon Intensity of DeNovo's energy and feedstock has the potential to increase the market access and price competitiveness of Proman's chemicals in the low-carbon future, whilst also reducing risk exposure to low-carbon regulation and lost market-share to low-carbon competition.

Strategy:

The Climate Change and Energy Transition Strategy includes an evaluation of the following two business development opportunities:

1. Carbon Capture and Sequestration (CCS), with capture of carbon dioxide generated by Proman's chemical plants and its permanent storage in depleted offshore oil and gas reservoirs.
2. Utility scale Renewable Energy (RE) supply by DeNovo to offset the use of gas in Proman's chemical plants to potentially produce hydrogen for lower carbon intensity ammonia production.

5.2 GREENHOUSE GAS (GHG) EMISSIONS**Policy 2.2 on Greenhouse Gas (GHG) Emissions Monitoring and Reporting:**

- c) DeNovo has completed GHG annual emissions assessments and reporting since the start of operations, in compliance with its Certificate of Environmental Clearance (CEC) permit. DeNovo will continue to report on emissions which have the potential to increase global warming following the standards of the Greenhouse Protocol (7).
- d) DeNovo reports on Scope-1 GHG emissions from our its operations, Scope-2 GHG emissions from purchased energy products, such as electricity and Scope 3 emissions in particular GHG emissions from road tanker wagon ('RTW') trucking of condensate as well as produced water from the GPU.
- e) DeNovo strives to continuously improve on our GHG reporting and will expand reporting on Scope-3 GHG emissions which originate from the supply chain, including estimates from suppliers (where practical), and estimates from our downstream offtake associated with Proman's chemical plants, in the near future.
- f) DeNovo conducts methane monitoring at our facilities in order to detect and prevent fugitive methane emissions. In line with our CEC conditions, DeNovo completes an annual Greenhouse Gas Inventory which includes data for methane, carbon dioxide and nitrous oxide. Methane gas leaks represent a critical safety hazard having potential for fire and explosion. Methane emissions also have a 21 times greater impact on global warming than equivalent amounts of CO₂ emissions, and thus require a higher level of diligence in emissions avoidance, especially for a gas producing company.

Policy 2.3 on Greenhouse Gas (GHG) Emissions Reduction:

DeNovo will continue to identify and implement GHG emissions reduction strategies across our operations, including offshore and onshore facilities, our corporate offices, and our supply chain, with a goal to achieve measurable best in class GHG emissions per unit of gas sold.

Policy 2.4 on improving Energy Efficiency of our Operations:

- a) DeNovo will continue to assess the amount of energy used in our operations, which includes energy generated at our facilities and energy imported via electricity, consumed at our offshore facilities, our gas processing unit, and at our offices. DeNovo will continue to identify opportunities to improve the energy consumption per unit gas sold via energy efficiency measures and offsetting energy-inefficient fossil-fuel sources of energy with renewable sources of energy.

A good example of this initiative is DeNovo's use of unmanned offshore platforms and the 100% renewable energy powered Zandolie platform.

Policy 2.5 on Flaring of Gas:

- a) As a natural gas producer, the only gas flaring done is for emergency pressure release associated with our gas processing facility and during planned start up and shut down of maintenance events utilizing the enclosed ground flare which is an important safety feature in our operations. The enclosed ground flare has a continuous pilot flame, which burns a minimal amount of gas to ensure the system is always ready for its primary purpose as an over-pressure safety system. There is no flaring at our offshore facilities.
- b) DeNovo uses an enclosed ground flare in order to minimise smoke, heat and noise emissions for our fence-line communities. DeNovo reports on the volumes of hydrocarbon flared, date and duration of flaring activity, and GHG emissions associated with our emergency ground flare system.

6 ENVIRONMENT

During the planning stages leading up to the construction phase of DeNovo's facilities a comprehensive Environmental Impact Assessment (EIA) was completed, as required by the Environmental Management Authority of Trinidad and Tobago (EMA). DeNovo will at all times be in compliance with our onshore and offshore Certificates of Environmental Compliance (CECs), as is required by law in Trinidad and Tobago.

6.1 WATER RESOURCES

As a natural gas producer, DeNovo's demand for water in its operations is minimal as there is no water injection into the gas fields. A minor amount of water is produced with the hydrocarbons flowing from the reservoirs, which is separated out as a waste stream at the GPU. There are waste streams associated with drilling of wells during drilling campaigns, which include drill cuttings, drilling fluids, produced water during well tests, and sanitary and food waste.

Policy 3.1 on Discharges to Water:

DeNovo's wastewater and site water disposal shall at all times meet the requirement of our Certificate of Environmental Clearance (CEC).

- a) DeNovo's gas processing unit's wastewater is transported off-site, remediated to within compliant specifications in line with the Environmental Management Act Water Pollution Rules, 2019, and the Certificate of Environmental Clearance, and is then disposed of in line with the regulatory requirements and our Waste Management Plan (DELI-GEN-DEL-HS-PLN-0002).
- b) All rainwater discharge at the gas processing unit is collected in a run-off water sump, and similarly only released when specifications meet minimum environmental criteria.
- c) During drilling campaigns all drill cuttings and fluids which meet regulatory specifications will be discharged to sea. All other waste streams are brought ashore to be processed and disposed of in line with regulatory requirements.

6.2 BIODIVERSITY

DeNovo's environmental impact study highlighted minimal impact to habitat and ecosystems, with the gas processing facility and pipeline located on abandoned farmland within an industrial area. The offshore facilities and 14" gas pipeline have a limited seabed footprint. A limited area of coastal mangroves was disturbed during the construction of the gas pipeline, affecting an area less than one tenth of a hectare. DeNovo implemented a mangrove restoration plan which documented the baseline physical and biological characteristics of the mangrove before it was cleared and after the pipeline was installed.

The natural recovery of the mangroves was monitored over a five-year period after the installation and after the five-year period the area was covered with new growth beyond the initial baseline. Policy 3.2 on Biodiversity:

- a) DeNovo will select development designs which minimize ecosystem impacts, and we will operate our assets in compliance with all regulatory requirements which are intended to protect biodiversity in the marine and terrestrial settings.
- b) DeNovo will seek to minimise the impact on ecological habitats and provide remediation where necessary based on the geographical location of our sites.

6.3 AIR EMISSIONS

Air emissions at DeNovo's operations are associated mainly with flaring of gas in order to safely manage emergency overpressure periods, or during planned shutdown and start up events during maintenance. DeNovo's enclosed ground flare configuration minimizes harmful smoke, heat and noise associated with flaring events. Air emissions are dispersed and diluted downwind which is dominantly seawards of the facility.

Policy 3.3 on Air Emissions:

- a) DeNovo manages its operations to minimize flaring. Any planned flaring events will be undertaken during favourable weather conditions in order to minimize the impact of air emissions to neighbouring facilities within the industrial estate. DeNovo records all flaring and any other air emission events, and reports all flaring and emissions to the Environmental Management Authority, in compliance with the requirements of its Certificate of Environmental Clearance.
- b) Ambient Air Quality Testing is conducted on a quarterly basis to monitor downwind air-quality at the GPU's fence boundary to ensure no hazardous air pollution levels occur beyond the plant boundaries.
- c) Hazardous air emissions associated with a gas or fluid containment emergency are avoided by ensuring at all times that safe operational practices are adhered to (namely: Safe Isolation and Plant Reinstatement (SIRP) Procedure (DEIA-GEN-DEL-OP-PRD-0005), Integrity Management Standard (DELI-GEN-DEL-OP-STD-0003) and Major Accident Risk (MAR) standard (DELI-GEN-DEL-SA-STD-0001). Any Process Safety emergency will be managed via our Emergency Response Plans (DEIA-GEN-DEL-HS-PRD-003 and DEIA-GPU-DEL-HS-PLN-0001).

6.4 SPILLS

As a natural gas producer, the danger of spills is mainly associated with the pipeline transportation of the natural gas condensate liquids which are then separated from the methane gas at the onshore gas processing unit, fiscalised and then transported offsite via RTW's sale to a condensate purchaser.

Policy 3.4 on Spills:

- a) Handling of natural gas condensate liquids at the gas processing unit, whether by qualified DeNovo staff or 3rd party personnel, must at all times follow the NGL- Natural Gas Condensate (Petroleum) Safety Data Sheet procedures (DEIA-GPU-FAS-HS-SDS-0001) relating to safe handling and transport of condensate liquids in order to prevent the occurrence of spills. The aforementioned procedure applies to the handling within DeNovo's facility, along the transport route, and offloading at our client's facility.
- b) Handling of any hazardous process chemicals at DeNovo's sites must also follow DeNovo's safe handling procedures for hazardous material by qualified personnel.
- c) Should any spill occur, the impact must be minimized by following DeNovo's Procedures to contain and clean up spills (DeNovo Hydrocarbon Spill Contingency Plan (DEIA-GEN-DEL-HS-PLN-0001).
- d) Leaks and spills in excess of ten (10) litres of hydrocarbon or spills of any other chemical in quantities that would render it hazardous as defined within the safety data sheets (SDS) for the chemical, shall be reported to the Environmental Regulator, in compliance with our environmental CEC permit.

- e) Larger spills associated with a loss of fluid containment emergency, including during transport by qualified 3rd party services to our client's site, must be managed in line with DeNovo's Emergency Response Plan, as per our Policy on process safety as referenced in this document.
- f) DeNovo shall complete regular emergency training drills, to include 3rd party personnel and national emergency services, in order to ensure readiness to contain any spills.

6.5 DECOMMISSIONING

Decommissioning means the removal of our facilities both offshore and onshore, ensuring the seafloor sites and onshore site are safely cleared of all obstructions and materials. The wells are plugged and abandoned in a manner that ensures no future leakage, the platforms and well risers are cut below mudline and removed, the pipeline is cleared of any remnant hydrocarbon fluid or produced water and removed, and the seafloor is cleared of all obstructions and materials. The onshore gas processing unit would similarly be removed. All removed material are then either recycled or disposed of in a manner that meets regulatory requirements.

Policy 3.5 on Decommissioning:

- a) At the end of the useful life of our offshore and onshore facilities, including our platforms, wells, pipeline, and onshore gas processing unit, shall be decommissioned as per the requirements of the Production Sharing Contract (PSC) which governs the licensing regime for the license area
- b) Decommissioning shall be completed in line with DeNovo's Decommissioning Standard (DEIA-GEN-DEL-PM-STD-0002_R0) as well as decommissioning permit requirements. Decommissioning shall be completed with minimal risk to safety and the environment, and with minimal impact to any facilities or activities of neighbouring operators and stakeholders, as per DeNovo's HSSE Management System Framework Environmental and Climate Change Standard (DELI-GEN-DEL-HS-STD-0021).
- c) DeNovo is obligated by the PSC to ensure funds will be available to cover the cost of the decommissioning when it is required. DeNovo will achieve this either through the provisioning of an escrow account or suitable alternative such as a parent or bank guarantee.

7 HEALTH, SAFETY AND SECURITY

DeNovo's leadership is committed to delivering our business with zero harm to employees, contractors, partners, suppliers, and our neighbouring communities. Policies related to Health, Safety, Security, and the Environment (HSSE) are published in DeNovo's HSSE Policy document DELI-GEN-DEL-HS-POL-0002_R2 which is posted on DeNovo's website.

7.1 PROCESS SAFETY

Process safety ensures that the flammable and hazardous hydrocarbon fluids we produce, process and sell are at all times contained and within safe operation limits. Major accidents may be caused by any uncontrolled release of produced natural gas and condensate liquids from our offshore platforms, our offshore and onshore gas pipeline, the onshore gas processing unit in the Point Lisas Industrial Estate, and the road transport of gas-condensate liquids to our client's facilities.

Policy 4.1 on Process Safety:

Process Safety is paramount to the safe operation of DeNovo's facilities. DeNovo shall ensure that:

- a) Facilities are designed, procured, constructed, commissioned, and operated to ensure the safe containment of hydrocarbon gases and liquids at all times.
- b) Rigorous standards and procedures aligned with industry best practice on process safety are in place at all times.
- c) Process Safety is a key component of DeNovo's Operating Management System, informed by plant monitoring and leading key performance indicators, supervised closely by qualified personnel, governed by management

and the board of directors, compliant with the laws of Trinidad and Tobago, and audited by external process safety experts.

- d) Employees are empowered and employees, contractors, partners, and suppliers are required to stop work whenever they believe there is danger to people or the safe operation of our assets.
- e) All Loss of Primary Containment (LOPC) events, even for minor non-flammable inert substances and fluids, will be documented and tracked as part of the HSSE Key Performance Indicator database, compared against industry benchmark data, and reported to DeNovo's leadership.
- f) Emergency Response Plans are in place to manage any Process Safety related incident (DEIA-GEN-DEL-HS-PRD-0003 and DEIA-GPU-DEL-HS-PLN-0001). Regular scheduled training and Emergency Response Plan practice drills involve employees, management, board leadership, and also include participation of key contractors, stakeholders and the emergency services, to ensure that we are ready to react and minimize the impact of any loss of containment incident.

7.2 WORKFORCE ENGAGEMENT IN HEALTH, SAFETY AND SECURITY

Policy 4.2 on Health, Safety and Security:

- a) Develops a culture that values good Health, Safety, Security and Environment (HSSE) performance and recognizes its link to good business performance.
- b) Empowers and requires employees, contractors, partners, and suppliers to stop work whenever they believe there is danger to people or the safe and secure operation of our assets.
- c) Consults and participate with workers and workers representatives to drive continuous improvement in HSSE, embrace intervention in unsafe practices and conditions, share lessons learnt, work with the industry to improve practices, and learn from the experience of others.
- d) Sets clear accountabilities for the delivery of HSSE activities. Implements a Management System Framework that provides a systematic risk management approach.
- e) Employs a systematic approach to HSSE geared towards hazard elimination, and continuous HSSE risk reduction to business and stakeholders.
- f) Delivers HSSE compliance within the law and drive continuous performance improvement.
- g) Sets HSSE objectives and targets for improvement, measure, and report performance.
- h) Ensures that contractors and consultants follow DeNovo's HSSE policy when working for DeNovo in any capacity, including as our agent, on our behalf, or in our name on any business activity not excluding outsourced activities.
- i) Ensures all DeNovo employees, contractors, and leadership are up to date with industry best practice HSSE training and certification.
- j) Monthly Safety Meeting, Safety Committee, and Incident Management Team as necessary:
 - a. DeNovo conducts an organisation-wide monthly safety meeting to inform everyone in the workplace about potential dangers and offer guidance on safe behaviours both inside and outside the workplace – informed by a risk-based approach. The monthly meeting discusses safety precautions and proactive steps that should be taken to keep everyone safe. The monthly safety meetings are not limited to work safety since it is also the medium to address and educate employees, contractors and engaged parties about social, security and environmental matters.
 - b. DeNovo has established a safety committee which comprises employees from various departments within the company. The safety committee's role is to help ensure workplace safety and participate in the development, implementation, and monitoring of DeNovo's HSSE policies and procedures. The agenda includes a Review of lessons learnt, near misses and industry learnings.

- c. DeNovo also has an Incident Management Team (IMT) which comprises of trained and experienced employees in various departments. DeNovo's IMT members rotate weekly and as part of the weekly handover discuss the past week's work activities as well as upcoming work activities for the week that the members should be aware of should an emergency arise and requires the IMT to be activated. The IMT conducts regular drills and training based on potential hazards associated with DeNovo's operations, to ensure that the members are equipped to respond to workplace incidents should the need arise.

7.3 WORKFORCE HEALTH

Policy 4.3 on Workforce Health:

- a) To protect worker's health and prevent occupational illnesses and injuries by identifying, assessing, and controlling exposure to hazardous agents associated with DeNovo's operations and implementing measures to recover from effects, in line with DeNovo's HSSE Management System Framework- Management of Occupational Health and Hygiene Standard (DELI-GEN-DEL-HS-STD-0005).
- b) Employ health risk assessment, mitigation, and management to ensure fitness for task, to protect personnel wellbeing, and to evaluate occupational health risks from exposure to air, food and water, safety, fatigue, stress, substance abuse and infectious diseases in the workplace.
- c) Establishment of a mental health and well-being programme that supports the development of good mental health. Employees have access to an outsourced Employee Assistance Programme (EAP) and are encouraged to use the facility, as needed.
- d) Ensure employees, contractors and partners undergo regular health screening to enable early detection and avoidance of personnel health issues, and to assess that personnel are fit for task.
- e) Our Emergency Response Plan includes the DeNovo Medical Emergency Response Procedure (DELI- GEN-DEL-HS-PRD-0021).

7.4 OCCUPATIONAL INJURY AND ILLNESS INCIDENTS

Policy 4.4 on Injury and Illness Incidents:

- a) DeNovo tracks and reports on all Health, Safety and Security incidents related to the workplace. HSSE incident reporting is key to learning from events and continuously improving our performance on health, safety, and security of our personnel. These are lagging indicators which provide insight into the effectiveness of DeNovo's HSSE risk mitigation initiatives.
- b) DeNovo also tracks leading HSSE indicators, such as, HSSE training hours, management tours, safety audits, engagement in safety observations and intervention.
- c) HSSE incident data is reported at DeNovo's Board and leadership level.

7.5 TRANSPORT SAFETY

Transport on roadways is recognized across the oil and gas industry as a high-risk activity and a disproportionate cause of fatalities. DeNovo transports produced water and gas condensate liquids via road t. Such journeys warrant extra precautionary procedures as there is an added risk of process safety incidents.

Policy 4.5 on Transport Safety:

- a) Any transport associated with DeNovo's business must follow our Driving and Land Transit Safety Guidelines (DELI-GEN-DEL-HS-GLS-0002), which detail DeNovo's approach to managing the risks associated with driving

and it is intended to prevent traffic accidents, reduce personal injuries and fatalities. The guidelines were developed in accordance with the laws of Trinidad and Tobago and IOGP standards.

- b) All Transport of hazardous substances must undergo a safety risk assessment and drivers must be trained in defensive driving techniques and certified to transport hazardous material.

8 SOCIAL

The first 6 of the 10 principles of the UN's Global Compact provides guiding principles on matters of human rights and labour practices. These are based on the Universal Declaration of Human Rights proclaimed by the United Nations General Assembly in Paris, 1948 (8), and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work adopted in 1998 (9). The ILO is a UN organization which brings together governments, employers, and workers representatives from all UN nations to set labour standards, develop policies and devise programmes promoting decent work for all women and men.

DeNovo's policy on human rights and labour is informed by the Guiding Principles for Business and Human Rights (2011) published in support of the UN Global Compact (10). These guiding principles clarify what is expected of business enterprises with regard to human rights and outline the process through which companies can identify their negative human rights impacts and demonstrate that their policies and procedures are adequate to address them.

These same principles are furthermore upheld by the laws of Trinidad and Tobago.

8.1 HUMAN RIGHTS MANAGEMENT

Policy 5.1 on Human Rights:

- a) DeNovo will strive to at all times respect and adhere to the human rights of our employees, stakeholders, and the communities impacted by our operations.
- b) The suppliers and partners we engage with should have similar policies and demonstrate similar behaviour.
- c) DeNovo, our suppliers and partners must implement due-diligence processes to identify, prevent, mitigate, and account for any human rights impacts which may result from our activities, and where possible, that any human rights abuses are remedied.

Human rights of specific relevance in our sphere of influence and activities, including for any jurisdictions outside of Trinidad and Tobago where we may be active, are as follows:

- The elimination of all forms of forced or compulsory labour/anti-slavery.
- The elimination of child labour.
- The elimination of discrimination in respect of employment and occupation.
- A safe and healthy working environment.
- The freedom of association and recognition of the right to collective bargaining.
- Everyone, without any discrimination, has the right to equal pay for equal work.

8.2 LABOUR PRACTICES

Policy 5.2 on Labour Practices

- a) DeNovo will ensure there is no discrimination in respect of employment and occupation, whether by gender, religion, age, national origin, ethnic origin, or social origin, or otherwise.
- b) DeNovo adheres to the principle of equal pay for equal work, with remuneration based on qualifications, experience, performance, and level of responsibility, recognizing also the wage levels of the jurisdictions in which we operate.

- c) DeNovo ensures that staff have the required training in order to perform their responsibilities at a high standard of delivery, that staff have regular performance reviews with constructive feedback, and are offered opportunities to build on their skills and advance their careers.

8.3 COMMUNITY ENGAGEMENT

Policy 5.3 on Community Engagement

- a) DeNovo is committed to supporting fence-line communities either directly or indirectly. Fence-line communities are a key stakeholder to both DeNovo and Proman.
- b) DeNovo continuously engages with the fence line communities providing support where needed. Under the condition of DeNovo's Certificates of Environmental Clearance (CECs) associated with public engagement, DeNovo is obligated to notify the fishing communities of continuous operations offshore.
- c) DeNovo is engaged in various community corporate social responsibility initiatives which includes donations to several schools as well as support with equipment, furniture and school supplies donated to an orphanage within the community – the Couva Children's Home and Early Care Centre.
- d) DeNovo is prohibited from making political contributions based on DeNovo's Integrity safeguard 4:18 - Any direct or indirect contributions in whatever form to political parties, movements, committees and political organisations, or to their representatives and candidates, are strictly forbidden, and any DeNovian found to have made such a contribution using our funds may face disciplinary proceedings that may lead to dismissal from service.
- e) DeNovo also collaborates with Nourish TT, a non-profit socio-economic enterprise whose focus is on ending hunger and reducing food waste in Trinidad and Tobago. Through DeNovo's support, Nourish TT has supplied food to over 4000 families, inclusive of families within the fence line community.

8.4 LOCAL CONTENT

Policy 5.4 on Commitment to Local Participation

- a) DeNovo is committed to providing local business and people with full, fair, and reasonable opportunity to participate in the supply of goods and services and to gain employment in all DeNovo operations. DeNovo expects all contractors to demonstrate the same level of commitment to providing local suppliers with the opportunity to compete for work.
- b) DeNovo adheres to the guidelines of the Trinidad and Tobago Energy Chamber's Local Content Management System.

Over 70% of our overall registered spend is local and reflects our commitment to local content investments.

Our Zandolie project was delivered within 31 months and 66% local content manhours. This project represents both a commitment to a greener energy future and confidence in the capability of our in-country industry partners to safely and efficiently deliver offshore projects of this unique nature.

- c) DeNovo will endeavour to abide by all relevant local content laws and guidelines within any territory that it operates.

9 APPENDIX

9.1 REFERENCES CITED

1. UN Sustainable Development Goals.
<https://www.un.org/sustainabledevelopment/sustainable-development-goals/>
2. UN Global Compact, The Ten Principles of the UN Global Compact.
<https://unglobalcompact.org/what-is-gc/mission/principles>
3. Extractive Industries Transparency Initiative, the 9 Expectations of supporting companies.
<https://eiti.org/documents/expectations-eiti-supporting-companies>
4. International Energy Agency, 2021. Net Zero by 2050, a Roadmap for the Global Energy Sector.
[iea.li/nzeroroadmap](https://www.iea.org/nzeroroadmap)
5. UNFCCC, December 2015: United Nations Framework Convention on Climate Change Paris Agreement.
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6. European Commission, Carbon Border Adjustment Mechanism (CBAM).
https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism_en
7. Greenhouse Gas Protocol, Corporate Standard.
<https://ghgprotocol.org/companies-and-organizations>
8. UN Declaration of Human Rights.
<https://www.un.org/en/about-us/universal-declaration-of-human-rights>
9. The UN Guiding Principles on Business and Human Rights.
<https://unglobalcompact.org/library/2>
10. The ILO Declaration on Fundamental Principles and Rights at Work.
<https://www.ilo.org/declaration/lang--en/index.htm>

9.2 INTERNAL DENOVO DOCUMENTS CITED:

- a. Integrity and Compliance Programme for Venezuela (V-ICP) (DELI-GEN-DEL-HR-PRD-0001).
- b. Waste Management Plan (DELI-GEN-DEL-HS-PLN-0002).
- c. Safe Isolation and Plant Reinstatement (SIRP) Procedure (DEIA-GEN-DEL-OP-PRD-0005).
- d. Major Accident Risk (MAR) Standard (DELI-GEN-DEL-SA-STD-0001).
- e. Health, Safety, Security and Environment (HSSE) Policy (DELI-GEN-DEL-HS-POL-0002).
- f. Emergency Response Plan - GPU Facility (DEIA-GEN-DEL-HS-PRD-0003)
- g. Emergency Response Procedure - Iguana and Zandolie NUI Platform (DEIA-GPU-DEL-HS-PLN-0001).
- h. NGL- Natural Gas Condensate (Petroleum) Safety Data Sheet Procedures (DEIA-GPU-FAS-HS-SDS-0001).
- i. Hydrocarbon Spill Contingency Plan (DEIA-GEN-DEL-HS-PLN-0001).
- j. HSSE Management System Framework (DEIA-IGP-HS-PRD-0013).
- k. Medical Emergency Response Procedure (DELI- GEN-DEL-HS-PRD-0021).
- l. Driving and Land Transit Safety Guidelines (DELI-GEN-DEL-HS-GLS-0002).
- m. Decommissioning Standard (DEIA-GEN-DEL-PM-STD-0002).