

PROCEDURE

PET-HSE27-EN-PRD-00007

HSE Regulatory Issues and Compliance Management



Objective

To provide a process that enables the identification and management of emerging significant HSE related regulatory issues (including new or modified regulations, rules, standards and/or industry practices), and the establishment and maintenance of HSE related regulatory compliance across the Petroleum Business.

Audience

HSE Personnel; Group Legal; and Corporate Affairs Managers.

Owner

Julian Seah, Head of Environment - Corporate

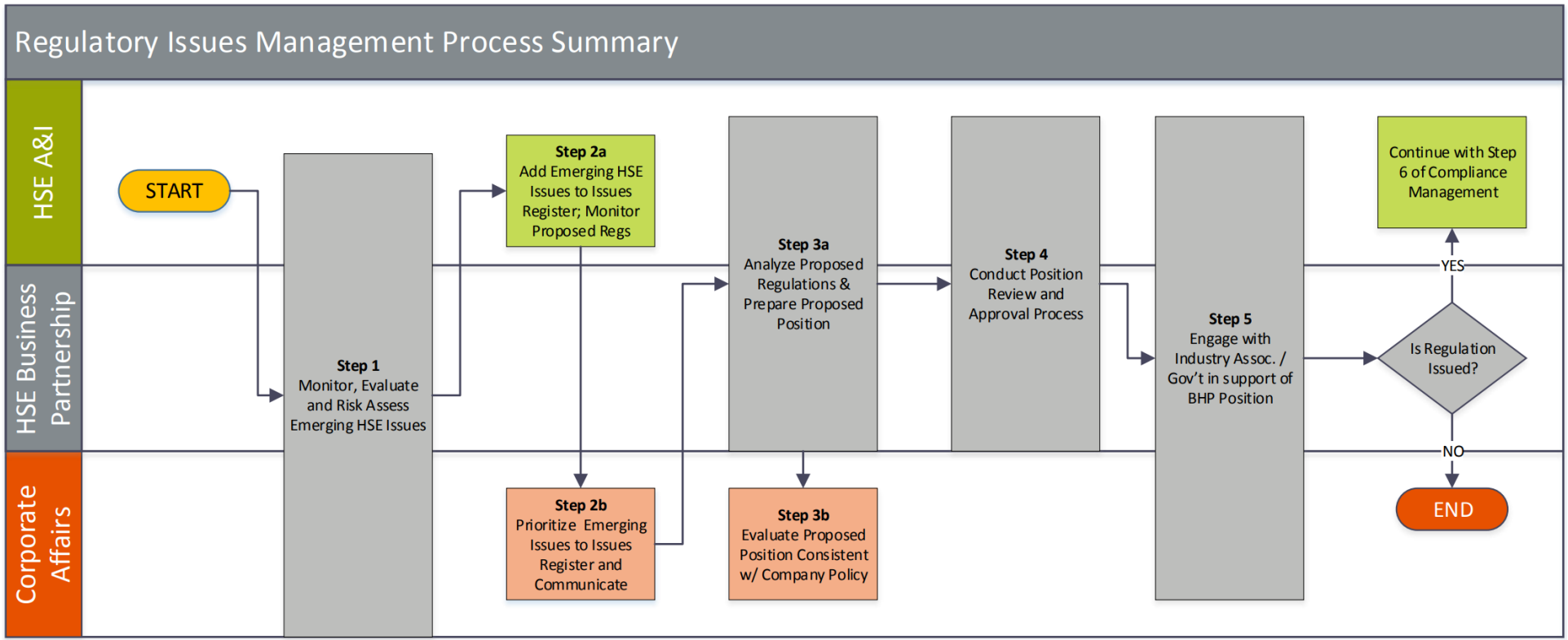
Document Signatures (e-signatures are permissible)

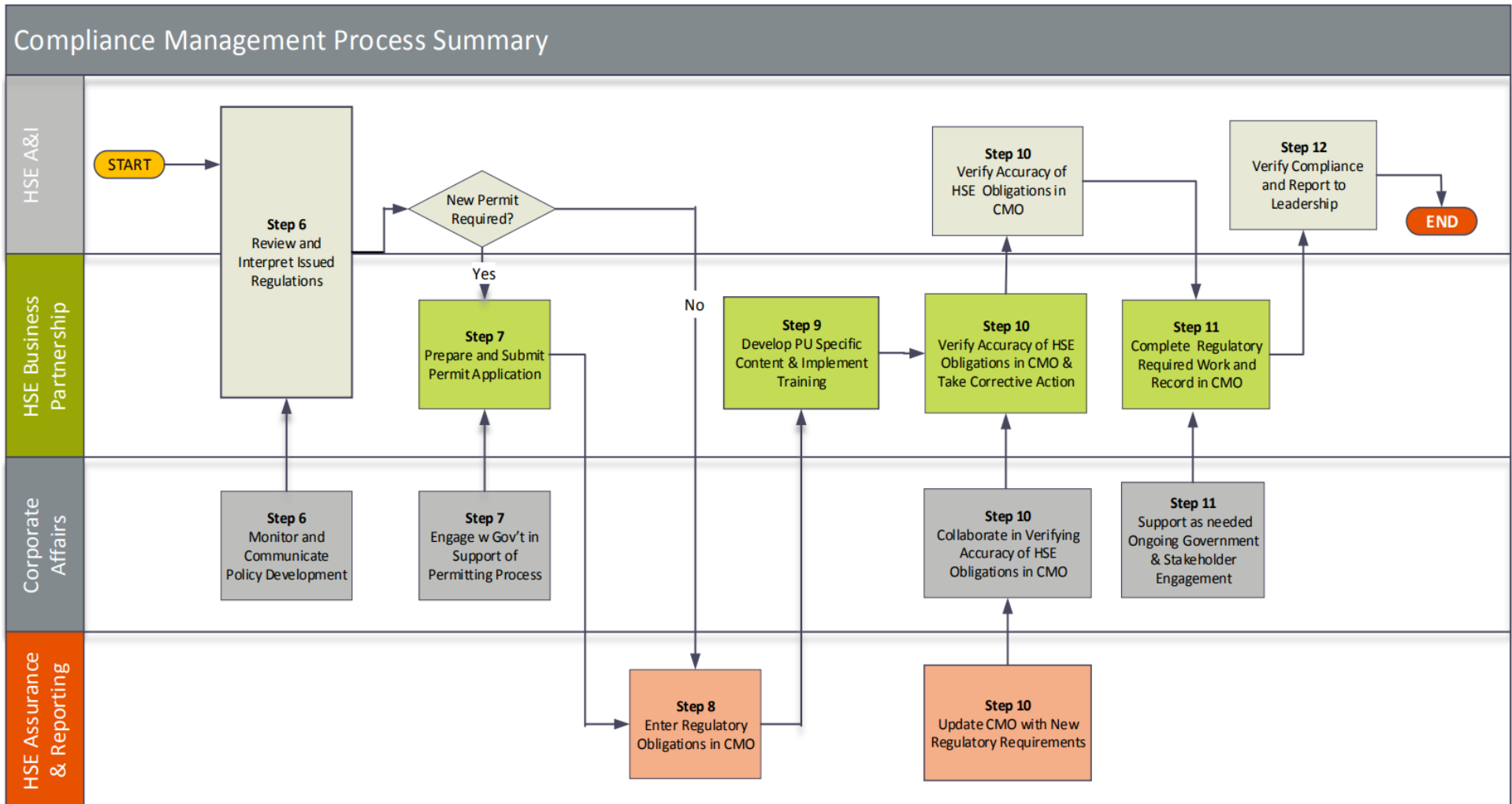
	Business Role	Name	Signature
Approver	VP HSEQ Projects	Karelis Holuby	<i>Signature on file – refer to Memorandum: Heritage BHP Petroleum HSE MS Post-Merger Update</i>

Disclaimer:

This document has been updated to meet post-merger requirements. Updates have been restricted to rebranding of logo, company name and revision number and date. Updates have not impacted the design or functionality, or taken away from original intent, of the document.

Process Summary





Procedure

Step 1. Monitor, Evaluate and Risk Assess Emerging HSE Issues

- *HSE Business Partnership, HSE A&I, in cooperation with Corporate Affairs and with advice from Legal to:*
 - Identify and monitor emerging and/or proposed HSE regulatory issues.
 - evaluate and risk assess the significance of the emerging HSE regulatory issues to Petroleum, following the risk process in Our Requirements for Risk Management and determine level of potential impact.
 - inform Asset leadership (e.g., Asset President, General Manager) of emerging HSE regulatory issues identified as potential business risk, establishing direction and priorities for issues management.

Outputs 1. Emerging HSE regulatory issues identified, assessed, communicated and prioritized

Step 2. Add Emerging HSE Issues to Issues Management Register and Communicate

- *Corporate Affairs to add emerging HSE Issues to the Issues Management Register.*
- *Corporate Affairs to prioritize emerging issues to the Issues Management Register and periodically inform the Petroleum Leadership Team.*

Outputs 1. Issues Management Register updated and maintained
2. Issues communicated as required

Step 3. Analyze Proposed Regulations and Prepare Proposed Position

- *HSE A&I, HSE Business Partnership, with support of relevant technical experts, to:*
 - analyze proposed HSE regulations, sourcing relevant background data as needed
 - determine Business impact of proposed HSE regulations, standards, rules and/or industry practices
 - participate in and prepare proposed position in cooperation with Corporate Affairs and relevant Industry Associations.
- *Corporate Affairs to evaluate proposed position for consistency with Company policy and submit comments either directly or in conjunction with Industry Associations.*

Outputs 1. Proposed regulations identified and analyzed for impacts
2. Proposed position developed, reviewed, and issued

Step 4. Conduct Position Review and Approval Process

- *HSE A&I in collaboration with HSE Business Partnership to conduct a position review and approval process and monitor the release of final HSE regulations.*
- *HSE A&I, HSE Business Partnership with support of relevant technical experts, to:*
 - clarify and interpret new and modified regulations, standards, and industry practices
 - issue a record of decision when interpretation is required
 - engage relevant HSE Business Partnership representatives to help identify if any new permits are required
 - develop and issue communication and guidance for compliance to relevant stakeholders.

Outputs 1. New or modified regulations, rules, standards, and industry practices identified, interpreted and communicated to relevant stakeholders

Step 5. Engage with Industry Associations and Governments

- *HSE A&I and HSE Business Partnership in collaboration with Corporate Affairs engage with industry associations and governments in support of Petroleum Deepwater Position.*

Outputs 1. Stakeholder engagement

Step 6. Review and Interpret Regulations, Standards, and Industry Practices

- *HSE A&I and Business Partnership to review and interpret the issued regulation and determine any permitting requirements or compliance plans.*
- *Corporate Affairs to monitor policy development. Communicate policy internally and advocate position externally.*

Outputs 1. Interpretation of issued regulations
2. Communication of policy development

Step 7. Prepare and Submit Permit Application

- *HSE Business Partnership teams, with support from HSE A&I, to prepare and submit relevant permit applications and engage relevant government regulators.*
- *Corporate Affairs to engage with governments in support of the permitting process.*

Outputs 1. Permit application submitted where relevant

Step 8. Enter Regulatory Obligations in CMO

- *HSE Assurance and Reporting, with support of the HSE Business Partnership team, to enter new or modified regulatory obligations into the CMO software or approved equivalent system, for compliance management.*

Note: Any new regulatory obligations identified by the HSE Business Partnership team are to be communicated to the HSE A&I team.

Outputs 1. New or modified regulatory obligations recorded in CMO to support compliance management

Step 9. Develop Training Content

- *HSE Business Partnership to develop PU specific content and implement training.*

Outputs 1. New or revised training content developed

Step 10. Verify Accuracy of Obligations in CMO

- *HSE A&I and HSE Business Partnership in collaboration with Corporate Affairs and Legal to annually verify the accuracy of HSE obligations contained within CMO:*
 - Complete the Regulatory Obligation Form in CMO
 - Engage Legal and Corporate Affairs to verify the accuracy of new or revised HSE regulatory obligations in CMO
 - Communicate changes to regulatory requirements with HSE Business Partners and stakeholders.
- *HSE Assurance and Regulatory to update CMO database with new regulatory requirements.*
- *HSE Business Partnership teams to review verification outcomes and take appropriate corrective action(s).*

Outputs 1. Annual review of regulatory obligations with outcomes communicated to key stakeholders for action

Step 11. Complete Regulatory Required Work and Record in CMO

- *HSE Business Partnership teams, with support of Operations, to:*
 - complete regulatory required work before recording the closure of the corresponding action within CMO
 - upload relevant documents to support the completed regulatory required work in CMO.
- *Corporate Affairs to support ongoing government and stakeholder engagement on compliance issues as needed.*

Outputs 1. Regulatory obligations fulfilled with relevant documentation recorded in the CMO software

Step 12. Verify Compliance and Report to Leadership

- *HSE A&I to verify compliance through the CMO monthly leadership report, with feedback provided to Leadership.*

Outputs 1. Compliance with the use of CMO verified with the monthly leadership report

Roles and Responsibilities

Role	Responsibility
HSE Business Partnership	<ul style="list-style-type: none"> ▪ Facilitate the management and compliance with HSE regulatory requirements at the operational level. ▪ Engage with regulatory agencies and local industry associations and monitor local emerging and/or modified regulations, rules, standards, and industry practices.
Corporate Affairs	<ul style="list-style-type: none"> ▪ Maintain the Petroleum Issues Management Register and periodically communicate the register content to the Petroleum Leadership Team. ▪ Engage with government agencies. ▪ Manage Industry Trade Associations memberships and participation.
Legal	<ul style="list-style-type: none"> ▪ Provide legal advice to emerging issues including draft regulations and new or modified regulations, proposed standards, and industry-wide practices.
HSE Analysis & Improvement (A&I)	<ul style="list-style-type: none"> ▪ Facilitate improvement in Petroleum wide processes that enable excellence in HSE management and regulatory compliance. ▪ Engage with HSE regulators, industry associations and international organizations, assessing applicability and develop strategic compliance plan
HSE Assurance & Reporting	<ul style="list-style-type: none"> ▪ Manage the regulatory processes and facilitate use of the CMO software.