

Safety, Health and Environmental Policy

Part 1: Statement of Intent

This is the safety, health and environmental policy statement of TownRock Energy Limited.

Our safety, health and environmental policy is to:

- Identify and minimise the risk of injury or health hazards to all persons who are affected by TownRock Energy's activities;
- Take all reasonable steps to prevent accidents, dangerous incidents, work-related ill health, or damage to property or the environment;
- Ensure that the legal obligations of TownRock Energy and all employees are fully observed;
- Consult with our employees on matters affecting their health and safety;
- Review and revise this policy regularly.

Signed:

Version, Issue Date:

V1.0 15 March 2021

Name, position:

David Townsend, MD

Review Date:

15 March 2022

Part 2: Responsibilities for health and safety

1 Overall and final responsibility for health and safety:

Name (position):

David Townsend (MD)

2 Day-to-day responsibility for ensuring this policy is put into practice:

Name (position):

John Naismith (Engineering Director)

3 Differentiation of Office and Site Working Environments

TownRock Energy employees work primarily in an office environment, but on occasions carry out work on site. Site activities may involve drilling operations, construction / engineering sites, or building plant rooms, which are a very different environment to the office. Our approach therefore differs depending on whether employees are in an office or a site workplace. Our policy is to:

- o Manage health and safety risks where we are working in TownRock office (or home / remote office) workplaces through our own policies and procedures;
- o Manage health and safety risks where we are working in an office workplace controlled by other organisations, by complying with and supporting their safety policies and procedures, by applying our own as far as is appropriate, and by ensuring good communication especially on safety matters, between organisations;
- o Manage health and safety risks for employees who may regularly work on site by requiring them to attend a certified training course on Safety in a Construction Environment (or similar title) and to obtain, and maintain valid, a CSCS "green card" so that they have the appropriate training and knowledge to attend and work on site. Where an employee's role is such that they are not expected to regularly work or visit on site, it is our policy to treat them as "Visitors" if they attend on site. In practice this means that a nominated TownRock employee (or representative of the company / organisation supervising the site) who has suitable safety training and knowledge, will take responsibility for the Visitor. For site work, we will:
 - Provide personal protective equipment;
 - Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work.

4 To ensure health and safety standards are maintained/improved, the following people have responsibility in the following areas:

David Townsend and John Naismith:

- Safety, consulting employees, accidents, first aid and work-related ill health;
- Risk assessments: a generic risk assessment for working on a drilling site is available – other risk assessments will be prepared as required.

David Townsend and John Naismith:

- Monitoring, accident and ill-health investigation, emergency procedures, fire and evacuation;
- Consideration of safety and environmental protection aspects in all stages of company workflows;
- Co-ordination of safety and environmental protection measures with those of other contractors, sub-contractors, and client safety representatives;
- Communication on safety and environmental protection matters with employees;

Jake Diamond:

- ???

4 All employees should:

- Co-operate with supervisors and managers on health and safety matters;
- Take reasonable care of their own health and safety;
- Always carry out their work in a safe and responsible manner, as they have a responsibility not only for their own safety, but that of their colleagues and third parties; and
- Report all health and safety concerns to an appropriate person (as detailed above).

Part 3: Arrangements for health and safety

Risk Assessment

- We will complete relevant risk assessments and take action:
 - We will carry out a Display Screen Equipment Workstation Assessment for all employees which will cover both TownRock workplaces and any regular Remote Working locations - see TownRock Remote Working guidelines;
 - We will prepare Risk Assessments for specific tasks / work situations;
- We will review risk assessments when working habits or conditions change.

Training

- We will give staff and subcontractors health and safety induction and provide appropriate training (including Construction in a Safety Environment training that matches CSCS requirements);
- We will provide personal protective equipment.

Consultation

- We will consult staff routinely on health and safety matters as they arise and formally when we review health and safety.

Evacuation

The company does not currently own its own workspace, therefore is not in control of escape routes or evacuation procedures. It therefore seeks to address these issues by reviewing procedures and practices in place in any workspace that it is using to confirm that:

- Escape routes are well signed and kept clear at all times;
- Evacuation plans are tested from time to time and updated if necessary.

Remote Working

- Remote (home) working poses somewhat different challenges in terms of safety and employee well-being as compared to working in an office environment;
- When employees are working from home, they are in an environment that is controlled by them, not by the company; nevertheless, they should still expect the company to have regard for their safety and well-being in that environment. The company addresses through its Remote Working Guidelines (which includes home working). This guideline includes a simple risk assessment. Using this tool, we will discuss with employees how they can manage their home working conditions so that they are as safe and conducive to the employee's well-being as is reasonably practicable;
- Similar considerations apply if employees are regularly, or from time to time, working in a location that is neither a company office nor their home;
- Employees are asked to follow the guidelines as far as is reasonably practicable, and to notify their supervisor if any situations of concern arise, so that a discussion can take place with a view to minimising risk;
- The Remote (home) Working Guidelines are updated if necessary.

Part 4: Environmental Statement

Context

TownRock Energy believes that businesses, especially those operating in the geothermal industry, are responsible for achieving good environmental practice and operating in a sustainable manner.

We are therefore committed to reducing our environmental impact and continually improving our environmental performance as an integral and fundamental part of our business strategy and operating methods.

Environmental Policy

Our policy is to

- Wholly support and comply with or exceed the requirements of current environmental legislation and codes of practice;
- Minimise our waste and then reuse or recycle as much of it as possible;
- Minimise energy and water usage in our buildings, vehicles and processes in order to conserve supplies, and minimise our consumption of natural resources, especially where they are non-renewable;
- Operate and maintain company vehicles with due regard to environmental issues, as far as reasonably practical, and encourage the use of alternative means of transport and car sharing as appropriate;
- Apply the principles of continuous improvement in respect of air, water, noise and light pollution from our activities and reduce any impacts from our operations on the environment and local community;
- As far as possible purchase products and services that do the least damage to the environment, and encourage others to do the same;
- Assess the environmental impact of any new processes or products we intend to introduce in advance;
- Ensure that all employees understand our environmental policy and conform to the high standards it requires;
- Address complaints about any breach of our Environmental Policy promptly and to the satisfaction of all concerned;
- Update, our Environmental Policy annually in consultation with staff, associates and customers.

For and on behalf of TownRock Energy Ltd

David Townsend, MD

March 2021

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