



Safety, Health and Environmental Policy

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Contents

Part 1: Statement of Intent.....	3
Part 2: Responsibilities for Health and Safety	4
2.1 Overall and final responsibility for health and safety:	4
2.2 Day-to-day responsibility for ensuring health and safety policy is put into practice:.....	4
2.3 Differentiation of Office and Site Working Environments:	4
2.4 To ensure health and safety standards are maintained/improved, the following people have responsibility in the following areas:.....	4
2.5 All employees should:	5
Part 3: Arrangements for Health and Safety.....	6
3.1 Risk Assessment	6
3.2 Training	6
3.3 Consultation	6
3.4 Evacuation	6
3.5 Remote Working.....	6
Part 4. Environmental Statement.....	7
4.1 Environmentally Conscious Business Development	7
4.2 Environmental Policy	7
Part 5. Supplementary Material.....	9

Part 1: Statement of Intent

This is the Safety, Health and Environmental (SHE) Policy statement of TownRock Energy Limited. This document is in accordance with the UK Health and Safety Executive (HSE) and the Health and Safety at Work etc. Act 1974, which regulates and enforces workplace health, safety and welfare in the United Kingdom.

The purpose of 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:

dv2.0 08 November 2023

Name, position:

David Townsend, CEO

Review Date:

Part 2: Responsibilities for Health and Safety

2.1 Overall and final responsibility for health and safety:

David Townsend (Founder and CEO)

2.2 Day-to-day responsibility for ensuring health and safety policy is put into practice:

Michael Schiltz (Health and Safety Manager and Geothermal Geologist)

2.3 Differentiation of Office and Site Working Environments:

TownRock employees work primarily in an office environment, but on occasions carry out work on site. Site activities may involve work on active drill pads, construction sites, engineering sites, or in building plant rooms. These areas are very different environments to the office. Our approach therefore differs depending on whether employees are in an office or a site workplace. Our policy is to:

- > Manage health and safety risks while working in the office or remotely at home through our own policies and procedures;
- > 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;
- > Manage health and safety risks for employees who may regularly work on site by requiring them to attend a CITB-certified, Health Safety & Environment training course for Operatives and to obtain and maintain a green CSCS “Labourer” 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 (PPE);
 - Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work.

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

David Townsend (CEO and Managing Director):

- > Oversight of safety, risk assessments, consulting employees, accidents, first aid and work related ill-health;
- > 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;

Michael Schiltz (Health and Safety Manager and Geothermal Geologist):

- > Management and upkeep of TownRock health and safety policies, risk management, CITB and CSCS accreditation, PPE maintenance, accident and ill-health investigation, first aid, emergency procedures, information, instruction and training;
- > Communication on safety and environmental protection matters with employees;

Jake Diamond (Senior Engineer) and David Walls (Senior Geothermal Geologist):

- > Site supervision

John Naismith (Executive Engineer):

- > Health and safety review and consultant

2.5 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

3.1 Risk Assessment

- > We have a complete risk assessment for office and remote (home) working and will take action with identified hazards and risk mitigation strategies:
 - 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 project specific Risk Assessments for site specific tasks;
- > We will review and update risk assessments when working habits or conditions change, and on a yearly basis.

3.2 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.

3.3 Consultation

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

3.4 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.

3.5 Remote Working

Remote (home) working poses different safety and well-being challenges when compared to working in an office environment. When employees are working from home or other remote work environment, they are in an environment that is controlled by them, not by the company. Our approach remains similar in the sense that they should still expect the company to have regard for their safety and well-being in that remote environment; however, the onus lies on each employee to be sure their remote workstation is compliant with the Remote Working Guidelines:

- > 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;

- > 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 reviewed annually and updated if necessary.

Part 4. Environmental Statement

4.1 Environmentally Conscious Business Development

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.

4.2 Environmental Policy

As stated previously in Section 3.4 the company does not currently own its own workspace, therefore it is not in control of upholding environmental statutory requirements at the office premises. It is however responsible for upholding requirements with regulating authorities such as Environmental Agencies (EA and SEPA) and the Coal Authority, or similar regulating bodies outside the United Kingdom during various stage of project development. It therefore seeks to address these issues by reviewing procedures and practices in place at any workspace that it is using to confirm its environmental standards of practice.

Our policy is to:

- > 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

Founder & CEO

Part 5. Supplementary Material

Health and Safety at Work etc. Act 1974 - <https://www.legislation.gov.uk/ukpga/1974/37/contents>
[accessed 08 Nov 2023]

HSE - Managing for Health and Safety (HSG65) - <https://www.hse.gov.uk/pubns/books/hsg65.htm>
[accessed 08 Nov 2023]

CITB industry training board - [About CITB - CITB](#) [accessed 08 Nov 2023]

Construction Skills Certification Scheme (CSCS) - [About CSCS | Official CSCS Website](#) [accessed 08 Nov 2023]

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