

FITC ENERGY GROUP

Est. 2024

Health, Safety & Environment Policy

Protecting People, Communities & the Natural World

Version: 1.0

Effective Date: 1 January 2025

Approved by: Board of Directors

Classification: Confidential — Internal Use Only

1. HSE Policy Statement

FITC Energy Group and its Subsidiaries is committed to conducting all of its operations in a manner that protects the health and safety of its employees, contractors, visitors, and the communities in which it operates, while minimising its impact on the natural environment.

We recognise that the energy sector presents inherent health, safety, and environmental (HSE) risks. We are determined to identify, assess, and manage these risks proactively. Our goal is zero harm: no fatalities, no serious injuries, and no significant environmental incidents.

HSE performance is a key metric of business success at FITC Energy Group, equal in importance to financial and operational performance.

2. Scope

This Policy applies to all FITC Energy Group operations globally, including:

- Upstream exploration and production activities
- Energy trading, storage, and distribution infrastructure
- Office premises and administrative functions
- All contractors and third parties operating at FITC Energy Group sites

3. Leadership & Accountability

HSE accountability is structured as follows:

Field	Details
Board of Directors	Approves HSE Policy; reviews serious incidents; sets HSE performance targets.
CEO / Managing Director	Accountable for overall HSE performance; chairs the HSE Committee.
HSE Director	Develops, implements, and monitors the HSE Management System.
Line Managers	Responsible for day-to-day HSE compliance within their teams and sites.
All Employees & Contractors	Obligated to follow HSE rules; report hazards; cooperate with investigations.

4. Risk Management

FITC Energy Group adopts a risk-based approach to HSE management:

- All new projects and operational changes must undergo a formal HSE risk assessment (HAZID/HAZOP as applicable) before commencement
- Risk registers must be maintained for all operational sites and reviewed at least quarterly
- The hierarchy of controls — Elimination, Substitution, Engineering Controls, Administrative Controls, PPE — must be applied in all risk mitigation decisions
- Permit-to-Work systems are mandatory for high-risk work, including confined space entry, working at height, hot work, and isolation of energy sources

5. Emergency Preparedness & Response

FITC Energy Group maintains an Emergency Response Plan (ERP) for each operational site. Requirements include:

- ERPs must be documented, communicated, and rehearsed via regular drills (minimum twice annually)
- Emergency contacts must be posted at all operational sites
- All personnel must complete emergency response induction before commencing site work
- Mutual aid agreements with local emergency services must be established for high-risk sites

6. Environmental Management

FITC Energy Group is committed to environmental stewardship. Our environmental commitments include:

- Compliance with all applicable environmental laws and regulations, including Kenya's Environmental Management and Coordination Act (EMCA)
- Minimising greenhouse gas emissions and tracking our carbon footprint annually
- Eliminating routine flaring at upstream operations by 2027
- Implementing waste minimisation, reuse, and recycling programmes across all sites
- Conducting Environmental Impact Assessments (EIAs) for all new projects in accordance with regulatory requirements
- Protecting biodiversity in areas of operation and avoiding sensitive ecosystems wherever possible

7. Incident Reporting & Investigation

All HSE incidents — including near-misses, injuries, environmental releases, and property damage — must be reported within the following timeframes:

Field	Details
Fatality / Serious Injury	Immediate notification to HSE Director and CEO; regulatory notification within 24 hours.
Lost Time Injury (LTI)	Report within 4 hours; full investigation within 7 days.
Near Miss / First Aid Injury	Report within 24 hours; investigation within 14 days.
Environmental Release / Spill	Immediate notification to HSE team; regulatory report as required.

Root cause analysis (RCA) methodology must be applied to all incidents above near-miss level. Findings and corrective actions must be shared across the organisation.

8. Training & Competence

FITC Energy Group ensures that all personnel have the HSE competence required for their roles:

- HSE induction is mandatory for all new employees and contractors before commencing work
- Role-specific HSE training plans are developed and reviewed annually
- Refresher training for safety-critical roles must be completed at intervals not exceeding 2 years
- HSE training records are maintained in the company's Learning Management System

9. Performance Monitoring & Review

FITC Energy Group monitors HSE performance through the following key metrics:

- Total Recordable Incident Rate (TRIR)
- Lost Time Injury Frequency Rate (LTIFR)
- Number of environmental non-conformances
- Number of safety observations and near-miss reports
- HSE audit findings and closure rates

The HSE Committee reviews performance monthly. The Board receives a quarterly HSE performance report.

Policy Owner & Review

Field	Details
Policy Owner	HSE Director
Review Frequency	Annual
Next Review Date	1 January 2026
Applicable Standards	ISO 45001:2018 (OH&S); ISO 14001:2015 (Environmental); OSHA; Kenya EMCA; NEMA Guidelines
Governing Body	FITC Energy Group Board of Directors