

HEALTH, SAFETY AND ENVIRONMENTAL (HSE) POLICY

FELTON ENERGY SERVICES LTD, an indigenous company engaged in the provision of services like man-power supply, procurement, and installation of Electrical and Mechanical equipment to her clients in the oil and gas sector considers the Health and Safety of her workers of much importance and as well understand the impact of her services on the Environment.

FELTON ENERGY SERVICES LTD is committed to:

- ❖ Establish and maintain an Occupational Health and Safety Management System which satisfies the requirements of ISO 45001:2018, all applicable statutory and regulatory requirements, industry best practice and any other Client specific requirements.
- ❖ A risk-based approach towards health and safety at work to prevent injury and ill-health
- ❖ Eliminating hazards and reducing health and safety risk
- ❖ Continually improving the health and safety management system
- ❖ Arrangements for ensuring safety and absence of health risks in connection with the maintenance activities and procurement materials.
- ❖ The provision of such information, instruction, training, and supervision as is necessary to ensure the Health and Safety of employees.
- ❖ Meeting all applicable legislation and other compliance obligations.
- ❖ Ensure continual improvement of the OH&S management system and performance, FESL shall regularly monitor and review the occupational Health and Safety Management System to ensure its effectiveness and to meet the objectives of the occupational Health and Safety management system, as well as current applicable legislation.

FELTON ENERGY SERVICES LTD understands that these values are not resident with the management alone but the collective effort of every person associated with her operations. We therefore call on every staff, worker, contractors and visitors to adhere to all established HSE rules, regulations and procedures to ensure compliance at all times.

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021

INCIDENT REPORTING POLICY.

FELTON ENERGY SERVICES LTD shall create, maintain, and file accident reports as required by law. Accident reports submitted to outside agencies and agents of the company shall be submitted in the required format.

All incidents and accidents; regardless of severity, resulting in, or likely to cause (near miss), injury or illness shall be reported to:

Establish a written record of factors that cause injuries and illnesses and occurrences (near-misses) that might have resulted in injury or illness but did not, as well as property and vehicle damage.

Maintain a capability to promptly investigate incidents and events to initiate and support corrective and/or preventive action.

Provide statistical information for use in analysing all phases of incidents and events.

Provide the means for complying with the reporting requirements for occupational injuries and illness.

The Incident Reporting System requirements apply to all incidences involving company employees, on-site vendors, contractor employees and visitors, which result in (or might have resulted in) personal injury, illness, and/or property and vehicle damage.

To ensure that all employees understand the incident reporting requirements and are aware of their own and other's responsibilities, annual training sessions will be held with all Key employees to review procedures and responsibilities. New Employee Orientation training will include information on incident reporting and procedures. Employees involved in record entry and record keeping will be trained in the company and statutory requirements.

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021

MEDICAL AND FIRST AID POLICY:

Felton Energy Services Ltd shall ensure that the medical health, fitness, and wellbeing of its field employees are not compromised.

To this end Felton Energy Services Ltd undertakes to:

Ensure that all personnel, employees, and contractors engaged on a worker are fit for work and healthy, by pre-employment screening (Drug Testing and a Fitness Test)

Ensure medical facilities are available to employees or sub-contractors to treat work related ailments and injuries.

Provide employee First Aid training to ensure each jobsite has a minimum of 51% of its workers competent and trained in First Aid to respond to emergencies.

Provide preventative medical examinations where required

Develop contingency plans for the handling of medical emergencies.

Ensure that personnel do not work excessively long rotations.

Ensure that all personnel are trained in ergonomics. (Stretching everyday)

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021

PERSONAL PROTECTIVE EQUIPMENT(PPE) POLICY.

Felton Energy Services Ltd requires all personnel to use appropriate PPE anytime their duties expose them to a possible hazard. Felton Energy Services Ltd provides a variety of PPE for the benefit and safety of their employees, including Safety Glasses, Safety Vests, Hard Hats, Safety Gloves, and Hearing Protection. Each specific work area will have its own PPE requirements.

All Felton Energy Services Ltd employees must wear footwear that is appropriate for the task undertaken, and suitable for the environment being worked in, and reflective vests will be always worn when conducting field activities.

Site specific PPE requirements (examples):

Workshop: Safety Toe Boots, Safety Glasses Goggles, Welding Helmets, (any person handling chemicals must protect themselves according to the MSDS for the material they are working with.

Vibrator Operators and Mechanics: Safety Toe Boots, Hearing protection

Person providing 1st Aid: Latex Surgical Gloves, CPR Shields

The Project Managers, the Field Safety Advisor and the Safety Department will monitor the provision of PPE to ensure that it is available for proper use. Each employee has the responsibility to utilize the available equipment and to report to his/her supervisor or the Safety Department, immediately, if the necessary PPE is not available, suitable, or not in good condition.

Noncompliance with safety rules places an employee, his/her co-workers and Felton Energy Services Ltd at risk, therefore, persistent, or deliberate noncompliance with safety rules can be grounds for termination of employment.

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021

SMOKING POLICY:

FELTON ENERGY SERVICES LTD understands the effect of smoking on individual's health and well-being so discourage indulgence in smoking.

For those in the habit of smoking, it is restricted to only designated areas.

Smoking is prohibited in refuelling areas, propane storage areas, offices, camp kitchen, recreation room, bunk rooms and around explosives.

Employees that fail to comply will be subject to enforcement principles up to and including dismissal. Smokers must follow Federal, State Legislation in this regard and each Manager will know the legislation and set up designated smoking areas according to legislation.

There will be no smoking in Felton Energy Services Ltd. vehicles, in any of its buildings, or within 5m of their entrances.

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021

SUBSTANCE ABUSE POLICY.

FELTON ENERGY SERVICES LTD considers substance abuse a serious violation of Company Policy and has an adverse impact on the health and safety of the employee, their families, fellow employees, contractors, and contractor's employees. It is Felton Energy Services Ltd. objective to ensure there is no substance abuse by all employees and not allow its use by any contractors on its sites.

To achieve this objective, management asks for the co-operation of each employee as well as contractors. FELTON ENERGY prohibits the possession, sale, transportation or use of illicit drugs, synthetics, or "designer drugs" or any other illegal substances, as well as any drug paraphernalia or equipment on or in any Felton Energy Services Ltd. premise, vehicle, job site, contractor site, client site, or business area.

The only exception to this policy will be for properly documented prescription drugs, and their required equipment, that are authorized by a licensed physician. Any prescription drugs that may affect the employee's judgment, ability to complete their job task, or ability to operate a motor vehicle must be reported to a supervisor prior to taking part in any company activity.

The use, possession, purchase, sale, or ingestion of an intoxicating substance on any FELTON ENERGY's premise, vehicle, job site, contractor site, client site, or business is strictly prohibited without the express consent of Felton Energy Services Ltd or its representatives and failure to observe this will result in the immediate removal from the site.

We encourage employees who have a problem to recognize such and come forward to seek assistance. An employee's job security will not be jeopardized by virtue of coming forward to ask for help.

While Felton Energy Services Ltd. is willing to help those employees who seek assistance, it is committed to strict enforcement of its policies relating to abuse for those who choose to ignore the policies. Violations of these policies are deemed a most serious matter, and employees will be disciplined accordingly.

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021

TRANSPORTATION & SEAT BELTS POLICY:

Transportation exposes Felton Energy Services Ltd employees to more risk than any other activity associated with our operations. To reduce transportation risks to an acceptable level, this Transportation Policy is being adopted and shall apply to all Felton Energy Services Ltd operations.

Driver Training and Qualifications Only approved personnel and contractors are allowed to drive vehicles on behalf of Felton Energy Services Ltd including company-owned or leased vehicles or vehicles rented for business purposes. Approval is granted to drivers who have been approved through HR/HSE investigating their driving history and/or completion of Felton Energy Services Ltd approved defensive driving course and competency evaluation.

Vehicle Responsibility for individual vehicles lies with the line managers who use the vehicles on their workers, sections, or locations. All supervisors should ensure that all drivers are trained and qualified and that all types of vehicles under their control are correctly fitted with the appropriate safety equipment, supplies and stickers. All drivers are responsible for checking each vehicle for maintenance, safety equipment and fuel levels, and prior to driving it. All drivers are responsible to follow journey management procedures. All drivers are responsible for the safety and security of themselves, their passengers and their cargo until the vehicle reaches its final destination.

Seat Belts As a condition of employment, all employees and contractors must always wear seat belts when driving or riding in a company on road vehicle. Drivers shall be responsible to ensure all passengers are wearing seat belts prior to departure. Failure to comply will result in disciplinary action up to and including termination.

Journey Management All locations shall have in place an active journey management program that complies with the Felton Energy Services Ltd standard. Each location a Journey Management program shall address all local driving conditions and identified risks. A Mob/De-mob plan shall be completed for every worker move of location.

Vehicle Tracking System Vehicle monitors shall be installed in vehicles where practical determined by service area. HSE Manager shall monitor these systems and use that data to improve driver skills.

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021

VEHICLE BACK UP POLICY.

Felton Energy Services Ltd. requires the first movement of a vehicle is forward where it is possible to do so. Following are procedures for backing up vehicle:

Don't back up unless you must.

As you approach an area where you need to backup, examine it closely – look out for any obstruction or possible hazards.

Pick out some landmarks that you will be able to see in your mirrors.

If there is more than one person in vehicle you MUST use a ground spotter to ensure your safety.

Follow only the direction of ONE spotter and STOP IMMEDIATELY if you loose sight of the spotter.

If you are asked to be a spotter on foot, make sure you know all the hand signals. Stand where the equipment operator can stop with the cab opposite you and have eye-to-eye contact with you.

If you become disorientated or unsure as to where you are or what is behind you, STOP!! If necessary, perform a walk-around the vehicle to see if any obstacles or hazards present danger or risk to safely backing up the vehicle or pull forward and circle around (left if possible.)

Be Alert.

The driver of the vehicle found responsible for the incident/accident may have driving privileges suspended and/or may face disciplinary action up to and including termination.

Signed.



Anyarah Uzochukwu

Managing Director.

19/7/2021

WORKING ALONE POLICY:

FELTON ENERGY SERVICES LTD considers working alone as when a worker is working and by himself alone in a particular location and assistance is not readily available if there is an emergency or the worker is injured or ill.

Working Alone is against company policy except for driving to and from a worksite.

When an Employee is required to Work Alone the following shall be in place:

All hazards to that worker must be identified and documented. Measures must be taken to eliminate any hazards, and if it is not practicable to eliminate the hazard, to minimize the risk from the hazard. The supervisor must ensure a mob/de-mob plan is created for checking the well-being of a worker assigned to work alone or in isolation under conditions which present a risk of disabling injury if the worker might not be able to secure assistance in the event of injury or other misfortune. The procedure for checking a worker's well-being must include the time interval between checks and the procedure to follow in case the worker cannot be contacted, including provisions for emergency rescue. In addition to checks at regular intervals, a check at the end of the work shift must be done. The procedure for checking a worker's well-being, including time intervals between the checks, must be developed in consultation with the joint committee or the worker health and safety representative, as applicable and with the worker assigned to work alone or in isolation.

A person must be designated to establish contact with the worker at predetermined intervals and the results must be recorded by the person. A worker to work alone and any person assigned to check on the worker must both be aware of the plan in place.

A written journey management plan providing step by step instructions to the employee to carry out their journey safely. Travel route, fuelling stops, and rest stops shall all be determined in advance. If an occurrence happens that alters these plans the supervisor or journey management, contact shall be notified immediately. Cell phone, radio or other means of communication and charger are required PPE for all of these Journeys. If there is no cell coverage a call must be placed from a land phone along prescribed route. Employees subject to work alone must be trained in these procedures and know what is expected of them.

If any employee working alone misses a check-in a second call will be made to them at a 15 minute later. If there is no response the emergency plan shall be put into place and calls placed to the employee at 15-minute intervals until there is contact or the emergency responders locate the employee.

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021

SECURITY POLICY:

Felton Energy Services Ltd operates on a worldwide basis in areas that can be considered volatile and dangerous. The company recognizes its obligations to ensure a healthy, safe, and secure environment for workers, assets, and the communities in which it operates. Our projects will be completed with minimal risk to personnel, property, and the community through the continuous assessment and management of security risks. To achieve the above policy statements the following general principles will apply when security is deemed necessary; or is directed by client and/or Felton Energy Services Ltd: Security and protection of employees is the overriding priority of all business activity.

Project Operations' Supervisor and HSE Manager are responsible to ensure that the proper resources and a comprehensive analysis of security threats both local and regional are completed before the project begins.

Project Manager is responsible for the creation; implementation and monitoring of project specific security plan.

The security resources and their organization of those resources must be sufficient to reflect our commitment to a safe and secure environment.

Project Manager, HSE, and any other members of security team must create Emergency Response Plans; set up appropriate training; and ensure enough resources are on hand to carry them out.

All employees must be properly trained in the recognition of security threats and the proper emergency response related to the threat.

Response plans are to be reviewed and tested monthly.

Line management and the workers are responsible to follow the security protocols set up for the project and actively participate in all training related to security activities.

Security measures and procedures are to be inspected on a regular basis. Security specialists whether employed or contracted are to be utilized to inspect, validate, and verify procedures in order to maintain a high level of confidence in the security systems.

All incidents must be reported and corrective action taken in order to improve the overall standards of security. Management must disseminate new information and procedure to other worksites.

All concerned parties need to be briefed of any identified security threats and incidents. This includes liaising with the appropriate government or local agencies (police, military, etc). All security activities and procedures in place should make every effort possible to minimize impact on the local communities.

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021

STOP WORK POLICY STATEMENT

It is the Health, Safety and Environment (HSE) Policy of Felton Energy Services Ltd to maintain a safe and secure work environment against any risk or exposure to personal harm, property damage or adverse effects to the environment.

As such, it is the duty and the right of every personnel employed and engaged by Felton Energy Services Ltd to exercise a 'Stop Work' intervention whenever any employee, person(s) or group's assets or local environment are at risk; or when there is a perceived risk to the life, health or safety of the individual(s) within the work environment.

The Management of Felton Energy Services Ltd is fully supportive of the decisions of an employee which is taken in the diligent execution of this Policy:

- 'Stop Work' shall be applied if any situation arises due to an unsafe action or behavior or omission or non-action of any party involved in the operation, and if such situation were permitted to continue, may potentially lead to the occurrence of an incident which may lead to personal injury or damage to Company asset
- Any member of Felton Energy Services Ltd - irrespective of his/her position/seniority/discipline has the right and duty to apply the 'Stop Work' Policy, if in his/her opinion or judgment, such activity is deemed to be an unsafe or risky behaviour
- There shall be no blame or fault put on any employee calling for a 'Stop Work' order even if, upon investigation, the 'Stop Work' order was deemed unnecessary.
- The 'Stop Work' order must be applied in good faith

- Timing is a critical factor. There should not be any delay in calling for a 'Stop Work' order if the need arises

Work that has ceased due to a 'Stop Work' order shall not be resumed until all safety aspects are cleared to the satisfaction of the employee who initiated the 'Stop Work' order or to the satisfaction of the employee whose work activities necessitated the initiation of the 'Stop Work' order.

As with other Company Policies, accountability for non-compliance will follow established company procedures or contract requirements.

Remember, 'IF IT IS NOT SAFE, DON'T DO IT!'

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021

COMMUNITY AFFAIRS POLICY:

Felton Energy Services places paramount importance on industrial harmony and good working relationship with the host communities where we work. As a corporate body, we have therefore evolved policies towards the affairs of the community in which we work as follows:

1. Pay homage to the host Community before the mobilization to site for any job.
2. Maintain good relationship with the host community in which we always work.
3. Participate to the best of our ability in their development programs.
4. Respect their culture and tradition by obeying and paying attention their laws and customs.
5. Evolve and maintain a line of communication with the host community or government even during periods of crisis by using the option of dialogue.
6. Generally carry out our operations in such a way as to minimize any negative impact of our operations on the environment.
7. Offer gainful employment to the youths of our host community, where feasible and appropriate.

Signed.



Anyarah Uzochukwu

Managing Director

19/7/2021