

ENVIRONMENTAL MANAGEMENT SYSTEM PUBLIC STATEMENT 2019

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REVISION CHANGE NOTICES

Date	Updated By	Section	Brief Description of Change
28 th May 2020	P Webber	2.0	Added NEO strategy approach

Approved for use by:

Name	Job Title	Signature
Glenn Corrie	CEO	
Paula Webber	HSE Manager	

1.0 INTRODUCTION

This report is written to comply with the requirements set out in the OSPAR recommendation 2003/5. The scope of the report is to provide the NEO Energy (previously NEO Petroleum) annual public environmental statement for 2019 and is focussed on the environmental issues associated with operations which were directly under NEO control.

2.0 NEO ENERGY

Effective from 19th November 2019, Verus Petroleum has changed name to "NEO Energy" (NEO). This name change has been instituted to reflect the Company's change in strategy and management and applies to the full range of NEO Energy companies.

NEO is an independent production and development company with both operated and non-operated interests.

The portfolio is a mix of operated and non-operated production and exploration assets and is shown in Figure 2.1. The operated Victoria Field ceased production on 15th January 2016.

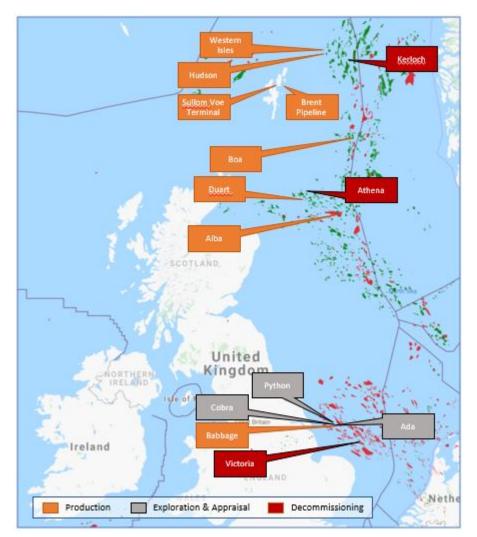


Figure 2-1: NEO UKCS Assets

3.0 ENVIRONMENTAL MANAGEMENT SYSTEM

NEO has an integrated Health, Safety and Environmental Management System (HSEMS) to ensure that all activities are managed in a safe and environmentally responsible way. The HSEMS provides assurance that all NEO activities are conducted in accordance with the company's HSE Policy shown in Figure 2.1.

The management system has been constructed to be compliant with recognised international standards for quality, environmental and safety management (ISO 14001).

In September 2018, the Environmental Management System contained within the HSEMS was subject to a successful OSPAR 2003/5 re-verification audit which was undertaken by ERMCVS. Reverification is due in September 2020.



Figure 3-1: NEO HSE Policy.

In 2020, the NEO organisation was expanded to include a dedicated HSE manager and function which has developed and manages the 2020 HSE plan which was approved by the NEO Board.

4.0 STRUCTURE

The scope of the HSEMS encompasses all NEO activities both onshore and offshore. The structure and content has been designed to enable critical activities to be identified and effectively managed such that risks to health and safety of personnel and adverse impact to the environment are reduced to a level deemed to be as low as reasonably practicable (ALARP).

NEO management is fully committed to the successful implementation and operation of all aspects of the HSEMS throughout all of its activities.

The system provides a flexible management framework through which the company can systematically identify and manage its HSE risks and opportunities, accommodating individual operational complexities, changing statutory and business requirements and the company's commitment to achieving continuous improvement. The framework for the management system is set out below.

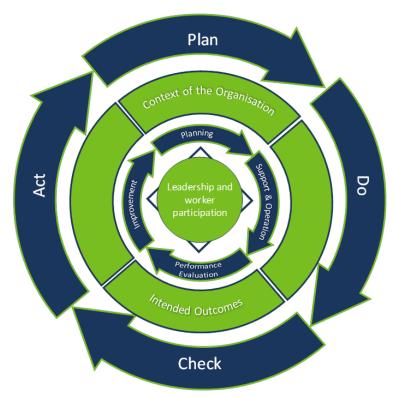


Figure 4-1: NEO Energy EMS Framework.

5.0 ENVIRONMENTAL REPORTING

5.1 ENVIRONMENTAL OBJECTIVES, TARGETS AND PERFORMANCE

As an integral part of the company's continuous improvement process, specific environmental objectives and targets are developed and included in an annual plan. These specific objectives and targets are set in the context of:

- Compliance with existing and future legislation.
- Meeting the commitments set out in the company HSE Policy and strategic objectives.
- Assessment of risks associated with planned activities.
- Past Performance.

The 2019 specific Environmental Objectives and Targets are presented in Table 5.1 below.

lssue	Objective	Target	Status
Proactive Leadership	Ensure appropriate liaison with key stakeholders	Follow stakeholder management plan	Completed as required.
	Review Environmental Performance	Board Meetings, Annual Review, Quarterly, Weekly	
HSE risks and impacts	Risk Assessment	Quarterly Enterprise Risk Management Process	Complete as required.
	Risk Assessments are suitable and sufficient	Complete all necessary risk assessments in a timely manner	
	HSEMS Internal Audit	HSEMS updated in 2019 to align with business strategy.	
	Non-Operated Asset Reviews	Quarterly assessment	
	Support HSE Due Diligence	Ensure HSE risks are identified	
	OSPAR EMS Reverification	Completed in September 2018	
Develop Intelligent	Transition HSEMS to NEO	Review HSEMS with NEO Strategy	Continue through 2020.
Integrated Management Systems	Review Legislative compliance	Legislation and Aspects and Impacts Registers quarterly reviews	Complete.
Effectively Manage Operational Interfaces	Prepare for Victoria Decommissioning; complete survey	Strategy and plan ongoing. EIA and Decommissioning plan developing.	Decommissioning planning to be completed 2020/21.
		Survey completed and no anomalies found.	
Develop ESG Strategy	Develop Environmental, Social and Governance Strategy and Plan	ESG KPIs, report on quarterly basis.	Reporting commenced from Q3 2018.

Table 5-1: Annual Environmenta	l Objectives and Targets.
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5.2 OPERATIONS

The HSE Management System is fully integrated into NEO business processes. On a rolling annual basis NEO develops a plan detailing the extent of its intended operational activities for the coming year.

Activity	Description	Block	Status
Gas production for the Victoria Field	Subsea Tieback to ConocoPhillips Viking Complex, production permits and consents managed by ConocoPhillips	49/17	Production ceased on 15 th January 2016. Asset is shut-in and export route disconnected
Survey of Victoria Wellhead.	Survey to check for visual integrity and damage.	49/17	No anomalies found. 11mT fuel usage.

Table 5-2: Operational Activities.