

2022 Annual Public Statement Petrogas North Sea Limited

Reason for issue: for information

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| 1 | 31/10/23 | Environmental Specialist | Environmental Advisor HSEQ Manager | General Manager |
| Revision | Date | Author | Reviewer(s) | Approver |

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1. OVERVIEW

1.1 BACKGROUND

Petrogas North Sea Limited (PNS), a Petrogas E&P LLC company (see Figure 1), is the licence operator of three licences located in United Kingdom Continental Shelf (UKCS). Two of these (P2025 and P2582) contain gas discoveries (Birgitta and Abbey), which PNS is planning to develop. Licence P2433 is an exploration licence, and PNS is planning to drill an exploration well before February 2025, to test for the presence of commercial gas volumes.

PNS obtained Well Operatorship for Licence P2025, to allow for the drilling of the Birgitta East appraisal well (22/19a-8), on 6 November 2019. The Birgitta East drilling operations, with the jack-up drilling rig Maersk Resilient (Currently owned by Noble Drilling), was successfully completed during the period January 2022 to May 2022, which fulfilled the licence commitment. A positive result was achieved and PNS is now working towards development of the Birgitta field.

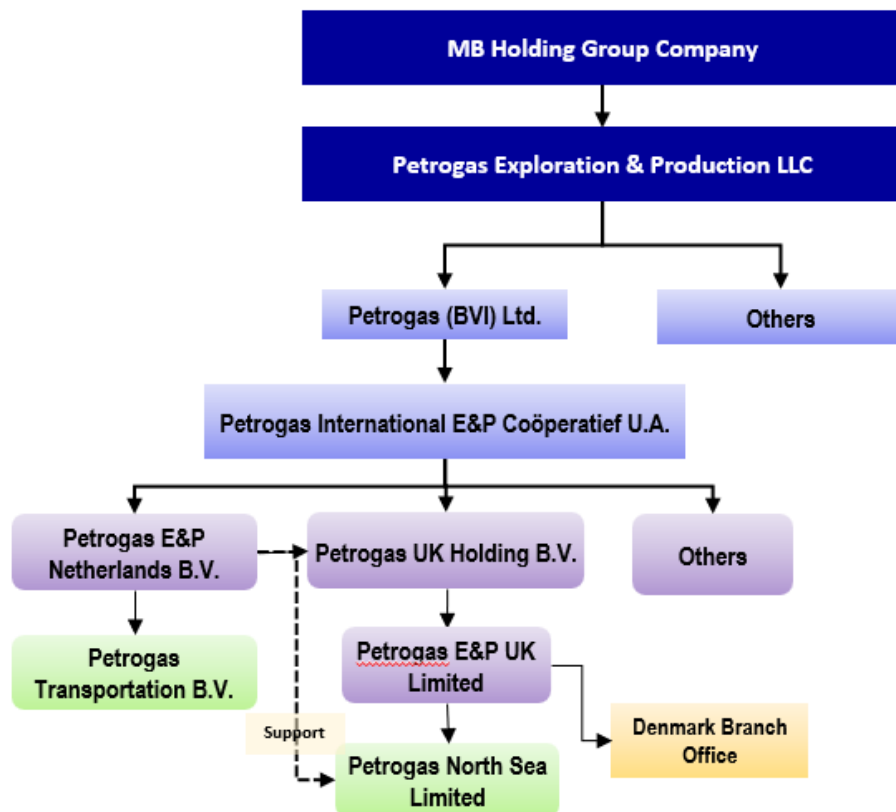


Figure 1 – Company Structure

1.2 CURRENT OPERATIONS

The 22/19a-8 "Birgitta East" appraisal well was the first well, which was drilled in the UKCS by PNS. It's drilling team has built an experience portfolio of successful offshore drilling and well P&A activities with sister company Petrogas E&P Netherlands (PEPN) on the Dutch Continental Shelf (DCS), since 2015. These operations were undertaken under the control and management of PEPN using a similar structure to the UKCS drilling operations of PNS. Of note is that the wells located in the Netherlands offshore A and B Quadrants, which are situated within the environmentally sensitive Dogger Bank Special Area of Conservation, a Nature 2000 European protected area.

Once the Birgitta drilling operations were successfully completed in May 2022, the appraisal well was P&A'd. PNS did not conduct a drill stem test for 22/19a-8, therefore, no flaring operations were executed, and no reservoir hydrocarbons were flowed to the surface.

In November 2022, PNS acquired 85% stakes in Abbey Field, Block 47/3i, and Baker Field, Blocks 47/3f, 47/2d, 47/7a & 47/8d, from Cornerstone North Sea Limited. PNS obtained the field operatorship for Abbey and the well operatorship for Baker.

The Abbey Field is currently under development, having already taken Concept Select for the project. An initial geotechnical survey was conducted over the winter of 2022/2023.

In the event that the Baker prospect is a gas discovery, it will be developed via a single development well tied back to the Abbey field. The planned exploration well will be P&A'd.

| License | Block | Working Interest | Operator | Phase |
|-----------------|-----------------------------|------------------|----------|------------------------|
| Birgitta- P2025 | 22/19a-8 | 100% | PNS | 2 nd Term |
| Abbey - P2582 | 47/3i | 85% | PNS | Initial Term - Phase C |
| Baker - P2433 | 47/3f, 47/2d, 47/7a & 47/8d | 85% | PNS | Initial Term - Phase C |

Table 1 – Summary of PNS licenses' status

2. ENVIRONMENTAL MANAGEMENT SYSTEMS

PNS operates an ISO14001:2015 certified management system: the Business Excellence Management System (BEMS). The system was certified according to ISO 14001:2015 on 22 September 2021, prior to the commencement of offshore drilling activities on the UKCS. The management system therefore meets the requirements of OSPAR Recommendation 2003/5 to Promote the Use and Implementation of Environmental Management Systems by the Offshore Industry. The annual verification audit has been successfully executed in September 2022, following a three-year revalidation cycle.

The basis for the management system is the concept of “Plan Do Check Act” which provides an iterative process to achieve continual improvement in performance. Figure 2 reflects the elements of this process and the relationship to the ISO High Level Structure requirements.

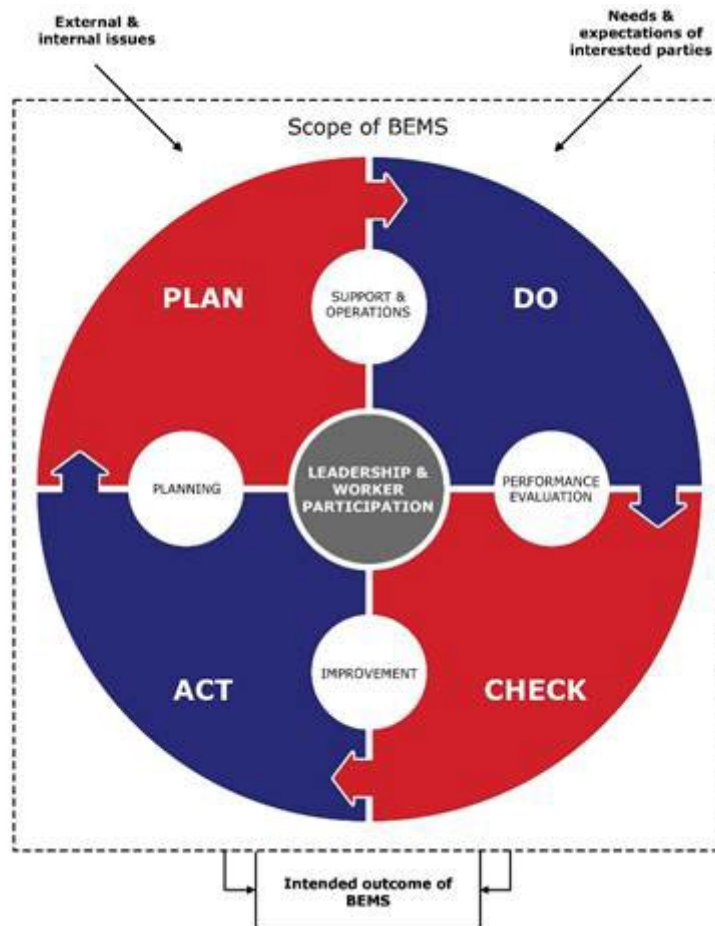


Figure 2: Plan-Do-Check-Act Loop

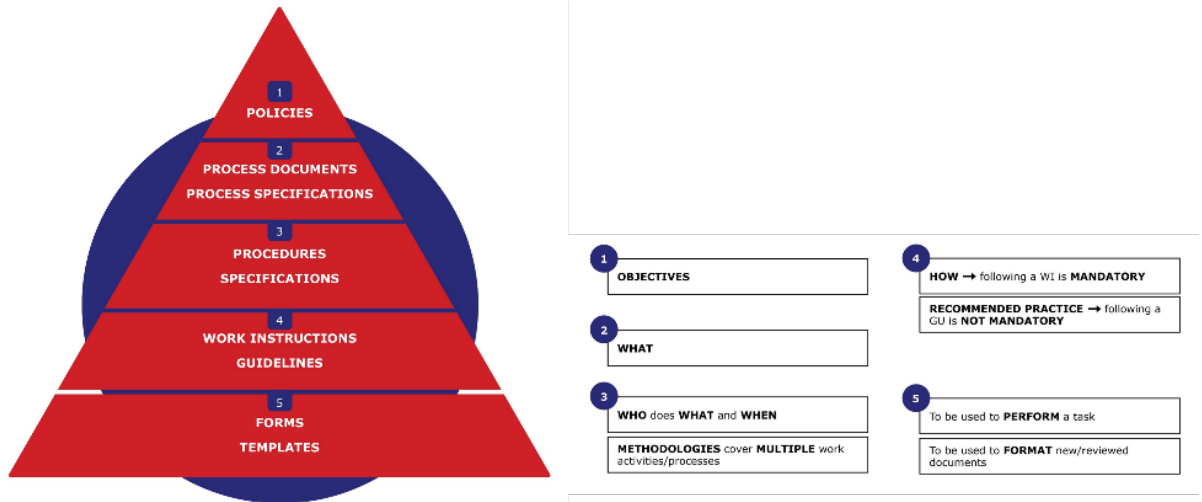


Figure 3 - BEMS Document Structure

The overall documentation structure for the BEMS is illustrated in Figure 3.

The BEMS includes an HSE Policy and Major Accident Prevention Policy (MAPP), as well as relevant safety and environmental processes and procedures as required by the ISO standards. The HSE Policy and MAPP are shown in Appendix C and Appendix D.

Key safety and environmental documents in the BEMS are listed in the table below.

| Document Title |
|--|
| HSE Policy |
| Major Accident Prevention Policy (MAPP) |
| Business Ethics Policy |
| BEMS Manual |
| General Management Process Document |
| Management System Process Specification |
| HSEQ Process Document |
| Incident Investigation and Reporting Process Specification |
| HSE Risk Management Process Specification |
| Environmental Stewardship Process Specification |
| Emergency Management Process Specification |
| Compliance Assurance Process Specification |
| HSE Compliance Register |
| Project Compliance Plan |
| Environmental Aspects and Planning Procedure |
| PNS Environmental Aspects Register |
| Management of Contractors Procedure |
| Management of Change Procedure – Drilling and Well Engineering |
| Competence Assurance Procedure |
| Well Engineering Process Document |
| Logistics Process Document |

The overall responsibility for BEMS lies with the General Manager, who has committed to its development, implementation and continual improvement. The General Manager shall demonstrate leadership and commitment with respect to BEMS by:

- Taking accountability for the effectiveness of BEMS;
- Ensuring that safety and environmental policies and objectives are established and are compatible with the strategic direction and the context of the organization;
- Ensuring that the resources needed for BEMS are available;
- Communicating the importance of effective safety and environmental management and of conforming to BEMS requirements;
- Engaging, directing and supporting persons to contribute to the effectiveness of BEMS;
- Promoting continual improvement.

3. ENVIRONMENTAL PERFORMANCE

Given the nature of Petrogas’ operations during 2022, the potential for significant environmental impact arose from:

- Atmosphere emissions from power generation;
- Chemicals use and discharge;
- Waste management;
- Accidental releases.

The environmental performance of Petrogas’ operations since 2022 are summarised in the following sections and have been reported to the Department for Business, Energy & Industrial Strategy (BEIS) via the UK Environmental Emissions Monitoring System (EEMS).

Petrogas North Sea confirm they have:

- Had no major accidents¹ during the last five years in the North Sea;
- Never been subject to enforcement action by the Regulator in the North Sea;
- Never been subject to criminal or civil action and no such action is pending; and
- Never been convicted for any breaches of legislation.

The PNS’ occupational and process safety performance statistics since starting operational activities in 2019 are shown in Figure 4 below.

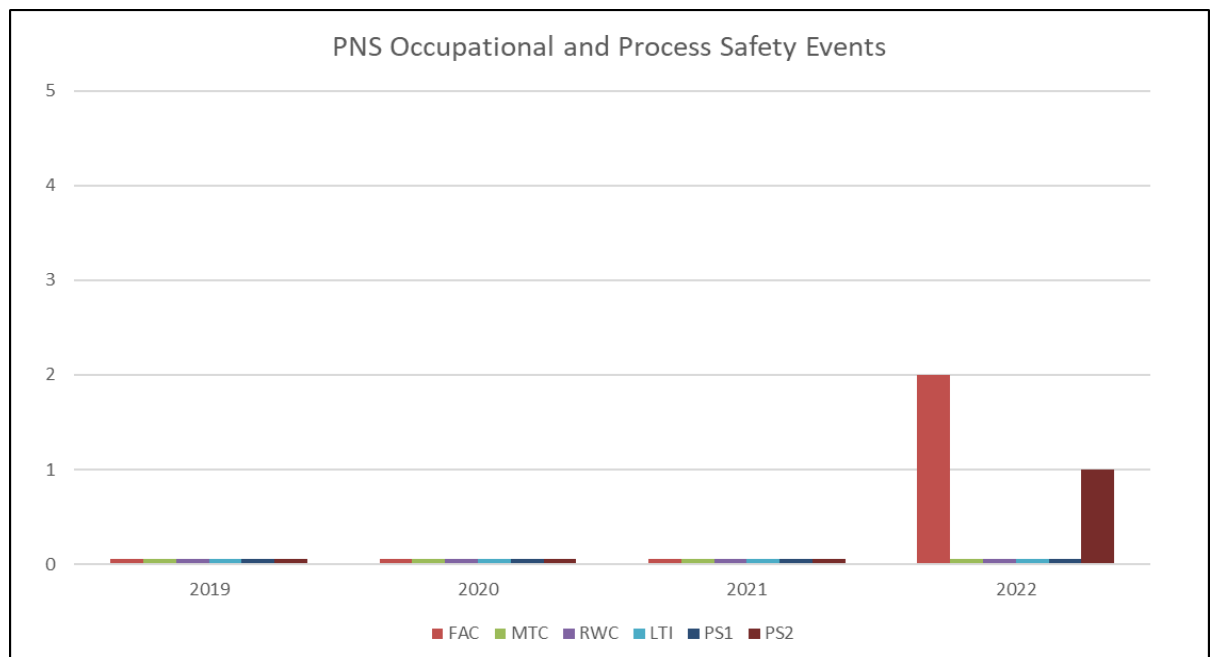


Figure 4: PNS Occupational and Process Safety Events overview

¹ As defined in Article 2(1) of the EU Directive on safety of offshore oil and gas operations (2013/30/EU)

3.1 ATMOSPHERIC EMISSIONS

Atmospheric emissions from Birgitta are derived from the generation of power required to drill the appraisal well operations.

A summary of the atmosphere emission generated from the Birgitta operation is given below. Emissions generated during the drilling activities are, however, to be considered Scope 3 emissions (refer to GHG Protocol), since PNS does not have actual operations in the UKCS, yet.

As a worst case the operations executed by PNS amounted to approximately 0.069% of the total UKCS CO₂ emissions and 0.064% of the total UKCS CO₂e emissions and therefore represents a relatively small contribution to total UKCS emissions in 2022. The contribution of CO₂e emissions to the total 2018 UK emissions of 451.5 million tonnes of CO₂e (BEIS, 2020) is also negligible.

| Source | | Atmospheric emissions (te) | | | | | | | |
|--|-----------------|----------------------------|--|------------------|-----------------|--------------|-----------------|-------------|-------------------|
| | | CO ₂ | NO _x | N ₂ O | SO ₂ | CO | CH ₄ | VOC | CO ₂ e |
| EEMS Emissions Factor ¹ | | 3.2 | 0.0594 | 0.00022 | 0.002 | 0.0157 | 0.00018 | 0.002 | - |
| GWP ² | | 1 | - | 265 | - | - | 28 | - | - |
| Source | Total tonnes | | | | | | | | |
| Birgitta Drilling | 1,030.22 | 3,296.70 | 61.20 | 0.23 | 2.06 | 16.17 | 0.19 | 2.06 | 3,361.96 |
| Other Birgitta Ops ³ | 1,832.00 | 5,862.40 | 108.82 | 0.40 | 3.66 | 28.76 | 0.33 | 3.66 | 5,978.44 |
| Total | 2,862.22 | 9159.10 | 170.02 | 0.63 | 5.72 | 44.94 | 0.52 | 5.72 | 9,340.40 |
| 2018 UKCS CO ₂ Emissions ⁴ | | 13,200,000 | 2018 UKCS CO ₂ e Emissions ⁴ | | | | | | 14,630,000 |
| Total Emissions as a % of UKCS CO ₂ Emissions, 2018 | | 0.069 | Total Emissions as a % of UKCS CO ₂ e Emissions, 2018 | | | | | | 0.064 |
| ¹ Emissions calculated using EEMS emission factors (EEMS, 2008). ² CO ₂ e figure is calculated by multiplying CO ₂ , N ₂ O and CH ₄ by their relevant GWP value (IPCC, 2014). ³ MODU, ERRV, Supply Vessel, Helicopter. ⁴ Total CO ₂ and CO ₂ e emissions from UKCS 2018 (OGUK, 2019). | | | | | | | | | |

Table 2 – Emissions evaluation

For Abbey, a geotechnical survey was conducted in the period December 2023 to January 2024. As the campaign was concluded beyond 2022, atmospheric emissions will be included in the annual public statement of 2023.

3.2 ACCIDENTAL RELEASES

The prevention of oil and chemicals releases is of the highest priority during Petrogas' operations, and consequently we maintain procedures, training and awareness campaigns in order to minimise the risk of release and to ensure a rapid response to an such event.

Oil and chemical release incidents are reported to BEIS in accordance with the Petroleum Operations Notice 1 (PON1) system. Petrogas was responsible for the occurrence of one such incidents in 2022, a summary of which is provided in Table 5 below.

| Reference | Date | Nature of Incidents | Type of spill | Estimated Maximum Quantity Released (kg) | Location |
|-----------|------------|----------------------|-------------------------|--|----------|
| BG-22-05 | 14/03/2022 | OBM discharge to sea | Synthetic Oil Based Mud | 50-80 litres | Birgitta |

Table 3 - 2022 Oil and Chemical Release Incidents

3.3 WASTE

In total, 3,620.54 tonnes of waste was generated from the Birgitta operations in 2022. Of this, 50 tonnes consisted of drilling 'slops' that were shipped to shore, after the well was plugged and abandoned; this waste was, then, sent for treatment and discharged under the approved consent.

| Total Waste (tonnes) | Reused / Recycled (%) | Landfill (%) | WTE (%) | Incineration (%) | Treatment (%) | Other (%) |
|----------------------|-----------------------|--------------|---------|------------------|---------------|-----------|
| 3,620.54 | 1.1 | 2.2 | 0.6 | 0.03 | 33.7 | 62.37 |

Table 4 - Fate of Waste Generated from Petrogas Operations in 2022

3.4 CHEMICAL USE AND DISCHARGE

Offshore use and discharge of operations chemicals is regulated by the Offshore Chemical Regulations 2022 (as amended), where the word "chemicals" refers to fully formulated products used offshore, whether these are comprised of one or more distinct chemicals substances. Such chemicals must appear on both the Centre for Environmental, Fisheries and Aquaculture Science (CEFAS) Definitive Ranked Lists of Registered Products and on the relevant Chemical Permit application.

All chemicals are tested and classified by CEFAS according to their potential to cause harm. The assessment relates to a combination of the rate of biodegradation, toxicity and potential to bio-accumulate. Environmental data are provided below according to those which are:

- Environmental benign i.e. labelled as **Pose Little Or No Risk** (PLONOR);
- Low risk i.e. listed in the CEFAS lowest risk categories ('E' or 'Gold' (exclusion PLONOR));
- Higher risk i.e. listed in the CEFAS higher risk categories.

Products identified by CEFAS as containing chemicals marked for substitution with a more environmentally friendly alternative are flagged with a "SUB" warning. Use and discharge of such chemicals is included in the following sections.

Petrogas continually work with chemicals suppliers to evaluate the potential environmental hazards of chemicals used, and to select less hazardous alternatives where practicable.

3.5 WELLS ACTIVITIES (DRA) CHEMICALS USE AND DISCHARGE

In 2022, Petrogas used 2,841,227 kg of chemicals during the Birgitta appraisal well activities. 372,688.6 kg of the chemicals were discharged to the marine environment.

In terms of environmental, only one" SUB" chemical" was used, but not discharged during the operations.

| | 2022 Chemical Use / Discharge (kg) | |
|--------------|------------------------------------|-----------|
| | Use | Discharge |
| Total | 2,841,227 | 372,688.6 |

| Chemical Label Code | 2022 Chemical Use / Discharge (kg) | |
|---------------------|------------------------------------|-----------|
| | Use | Discharge |
| PLONOR | 2,104,631 | 354,531.8 |
| SUB | 1,200 | 0 |

Appendix A References

| Reference Documents/Forms | |
|---------------------------|--------------------------------------|
| Document Number | Title |
| PNS-GEN-PY-00001 | PNS HSE Policy |
| PNS-GEN-PY-00002 | PNS Major Accident Prevention Policy |
| PNS-GEN-PY-00003 | BEMS Manual |
| --- | GHG Protocol |

Appendix B Abbreviations and Definitions

| Abbreviations | |
|---------------|--|
| Abbreviation | Description |
| BEIS | (Department for) Business, Energy and Industrial Strategy |
| BEMS | Business Excellence Management System |
| CEFAS | Centre for Environmental, Fisheries and Aquaculture Science |
| DCS | Dutch Continental Shelf |
| E&P | Exploration and Production |
| OPRED | Offshore Petroleum Regulator for Environment and Decommissioning |
| OSPAR | Oslo Paris (agreement) |
| P&A | Plug and Abandonment |
| PEPN | Petrogas E&P Netherlands B.V. |
| PLONOR | Pose Little Or No Risk |
| PNS | Petrogas North Sea |
| PON | Petroleum Operations Notice |
| UKCS | United Kingdom Continental Shelf |

| Definitions | |
|-------------|-------------|
| Word | Description |
| | |
| | |

Appendix C HSE Policy

HEALTH, SAFETY AND ENVIRONMENT POLICY



PURPOSE AND OBJECTIVES

Petrogas North Sea (PNS) goal is to protect our people, the public, our assets, the environment in which we work and live and our company reputation. This commitment is in the best interests of our workers and all associated stakeholders.

The Management of all Health, Safety and Environmental (HSE) aspects within PNS is embedded in the Business Excellence Management System (BEMS), which systematically manages all of PNS processes. The BEMS is a structured and documented system, which ensures that all personnel working at PNS offices and facilities are effectively implementing all BEMS Policies, including this HSE Policy and the Major Accidents Prevention Policy (MAPP).

The HSE objectives and targets are set by the PNS Management Team consistent with the company strategy and underpinned through the allocation of budget and resources supported by action plans, corrective actions, continuous monitoring and regular reviews with workers participation.

Business Excellence will be managed in order to:

- Build an Incident and Injury Free Operations Culture;
- Eliminate and/or minimise the impacts of our operations on the environment;
- Ensure Compliance with all applicable legislation and best practice;
- Incorporate sustainability principles into business decision making;
- Continuously improve to optimise performance.

SCOPE

This policy applies to Petrogas North Sea limited:

- Including all primary and supporting business processes related to the exploration and production of oil and natural gas;
- Including relevant management of operated exploration and production licenses;
- And including management of suppliers/ service providers up- and midstream in the supply chain.

The management of non-operated stakes is excluded from the management system, as is the management of produced oil and gas downstream in the supply chain.

POLICY STATEMENTS

Stop Work Authority. At Petrogas we focus on Safety, Health and Environmental Protection every minute, every day. As an Employee or Contractor, we are authorised and responsible for stopping any situation that has the potential to harm people and the environment, with the understanding that there will be no repercussions. We will never be penalised for stopping work that we believe is unsafe or speaking up about hazards and injuries or undesired behaviours.

Manage Safe Working. We will operate and maintain facilities to prevent injuries, illnesses, pollution and incidents.

Risk Management. We will strive to eliminate hazards and when not possible, substitute or control them to reduce all Occupational Health and Safety and Environmental risks to as low as reasonably practicable.

Security of Personnel & Assets. We will provide a safe and secure environment in which business operations may be successfully conducted.

Design & Construction. We will design and construct facilities to prevent injuries, illnesses, pollution and incidents and to operate in a safe and environmentally sound manner.

Management of Change. We will manage both permanent and temporary changes in our operations to prevent incidents, injuries and damages to the environment.

Reliability & Efficiency. We will operate and maintain wells and facilities to ensure asset integrity and prevention of incidents. We will maximize the efficiency of operations and conserve natural resources.

Contractor Management. We will work with our Business Partners to continually improve performance through systematic alignment of goals and conformance to Business Excellence.

Environmental Stewardship. We will strive to prevent pollution, continually improve environmental performance by implementing appropriate standards and procedures and mitigate environmental impacts from our operations by reducing the emission of greenhouse gasses, improving the energy performance of our assets and minimising and/or eliminating waste, discharges, emissions and the use of environmental harmful substances.

Incident Investigation & Reporting. We will investigate and identify root causes of incidents to reduce or eliminate systemic causes to prevent future incidents. We will strive to share the incidents learnings with our stakeholders.

Stakeholder Engagement. We will collaborate with all our relevant stakeholders for decisions that affect ourselves, others and the environment. We will strive for consultation and participation of workers, and, where they exist, workers' representatives.

Emergency Management. We will ensure we are ready to respond to any emergencies in a safe and effective manner and will make all required efforts to prevent or mitigate crisis situations.

Compliance Assurance. We will enable, promote, and verify compliance with applicable stipulated legal and corporate HSE related requirements.

Continual improvement. We are continually improving the effectiveness of the HSE system through findings from the risk based auditing, incident investigation, published best practice and corporate HSE related requirements.

ORGANISATIONAL AND ARRANGEMENTS

The General Manager (GM) is accountable for guiding the organisation and ensuring that adequate resources (e.g. people and finance) are available to allow the policy requirements to be achieved. The GM ensures that the organisational HSE and Sustainability objectives are set and reviewed annually according to the BEMS Manual.

The PNS Management Team is responsible for ensuring that those areas of the organisation within their influence are directed in a manner which upholds the principles of the HSE policy and sustainable development, and supports operation in meeting their aims, and follows the requirements of the BEMS.

The HSEQ Manager ensures that adequate competent advice is provided to the organisation in order to ensure that legislative and policy requirements and HSE objectives are achieved.

The Drilling Manager directs the operational department in a manner to which always ensure that the legislative and policy requirements are achieved so that health, safety and environmental risks are avoided or minimised wherever practicable, with focus on prevention.

The Technical Authorities have responsibility for ensuring that for their area of expertise, technical advice, design input and support meets the principles of the HSE policy and the requirements of its objectives.

All managers, supervisors, advisors, and authorised technical engineers will ensure that the principles of the policy and the aims of the objectives are reflected in any instruction, advice or development they are involved with. They will always ensure in their daily work that personal responsibility for the relevant HSE and sustainability aspects is displayed in their behaviour and decisions.

All individuals are responsible for the health and safety of themselves and their colleagues and for being environmentally responsible applying sustainable practices. They have personal responsibility for fully complying with the requirements of procedures and instructions whilst questioning any aspects of our activity, which may be improved to minimise harm to person, the environment, property or wider business from all sources of hazards.



Nick Dancer
General Manager

Appendix D MAP Policy

MAJOR ACCIDENT PREVENTION POLICY



PURPOSE AND OBJECTIVES

Our goal is to protect our people, the public, our assets, the environment in which we work and live and our company reputation. It is a commitment that is in the best interests of our workers, customers and all associated stakeholders.

We at Petrogas North Sea Ltd (hereafter PNS) recognise that due to the nature of our activities, exposure to major accident hazards could be possible to employees, contractor staff, visitors, members of the public and the environment. We therefore have the obligation to all these stakeholders to reduce the risks associated with such hazards to a level as low as reasonably practicable (ALARP), within our capabilities.

SCOPE

This policy applies to all offices and facilities operated by the PNS organization:

- Including all primary and supporting business processes related to the exploration and production of oil and natural gas;
- Including relevant management of operated exploration and production licences;
- And including management of suppliers/ service providers up- and midstream in the supply chain.

Management of non-operated stakes is excluded from the management system, as is the management of produced oil and gas downstream in the supply chain.

POLICY STATEMENTS

Leadership. The **Directors of PNS** have mandated the **PMT** to be responsible for ensuring that all the reasonably foreseeable major accident hazards associated with the PNS operations are identified, assessed and controlled so that the level of risk presented to people and the environment is reduced to an acceptable level. The **PMT** shall ensure that our integrated Business Excellence Management System (BEMS) holds effective health, safety, environmental, compliance and emergency response management arrangements and that these arrangements are implemented, maintained, and improved on an ongoing basis to meet the commitments of this Policy. Prevention of major accidents is an accountability that ultimately resides with the **PNS General Manager (GM)** and flows down as a responsibility through the line management structure to front line personnel performing work. All **PNS personnel** are responsible for managing major accident hazards within their role. All employees including contractors are empowered to act if they have any health, safety or environmental concerns.

Command and Control. PNS:

- ensures that arrangements for the identification, detection, control and prevention of major accident hazards and risks are clear and understood by all relevant people;
- ensures that responsibility and accountability placed on personnel for major accident prevention is made clear in the relevant BEMS documents and supported by associated training programmes and contractual arrangements;
- ensures effective management of interfaces between PNS and third-parties by placing on third-parties controls commensurate with the risks associated with their service or product;
- maintains emergency response plans to ensure clarity on the responsibilities and actions required of personnel in the event of a major accident.

Company (Safety) Culture. PNS:

- identifies and uses appropriate methods to reinforce to everyone the importance of major accident prevention;
- provides leadership training to the offshore managers and supervisors that is based around major accident events and major accident prevention;
- maintains strong links with the workforce through installation(s) visits and conducting conversations, audits and active monitoring relevant to major accident risk management;
- ensures that arrangements are in place for personnel to raise their safety and environmental protection concerns confidentially and securely;
- encourages the reporting of all accidents, incidents, safety concerns, and ensures that this is seen as a positive act, with no detrimental consequence to those involved;
- share improvement campaigns and initiatives which feature major accident prevention themes, designed to promote engagement
- ensures positive input to safe and environmentally sound behaviour is recognised, shared and awarded.

Competency. PNS:

- ensures that in addition to sharing our core safety value, all personnel engaged are aware of their individual role responsibilities with respect to major accident prevention management and have the competence and training to carry out these responsibilities;
- ensures the competency systems of service providers are reviewed as part of the selection process;
- ensures that training necessary for people to undertake safety and environmentally critical activities is identified and provided (including onboarding and skills and development trainings);
- ensures that ongoing competence assessments address competence in application of barriers to major accidents, and the safety criticality of people's roles is based upon their relevance to the availability and effectiveness of safety and environmentally critical elements.

Operational Control, Auditing and Review. PNS:

- ensures thru BEMS ongoing compliance with statutory requirements for major accident prevention management;
- ensures that effectiveness of the management system is assessed through a programme of audits and reviews undertaken by seconded Petrogas E&P international subsidiaries' employees, UK business, local offshore units and independent auditors;
- consult with our Independent Competent Person to ensure that understanding of the status of barriers against major accidents is validated and act as necessary to correct any shortfalls;
- ensure that the data collected to evaluate the status of major accident prevention controls (e.g. people, procedure and plant) is accurate through technical data security controls, which includes authorisation to access, system event logs and databases.

This Policy is reviewed and approved annually by the PNS Management Team.



Nick Dancer
General Manager