

ANNUAL PUBLIC STATEMENT ENVIRONMENTAL MANAGEMENT SYSTEM 2024

**Petrofac Facilities
Management Limited**

INTRODUCTION

This is Petrofac Facilities Management Limited’s 2024 annual public statement for environmental management, covering our UKCS operations.

Prepared in line with the reporting requirements of the UK’s Department for Energy Security and Net Zero, it meets the requirements of the Oslo Paris (OSPAR) Convention Recommendation 2003/5. It outlines our Environmental Management System (EMS) and our 2024 environmental performance.

WORKING RESPONSIBLY

Our EMS was developed alongside our Health, Safety, Security and Environment framework and the ISO 14001 standard for environmental management. It enables us to manage the environmental impacts arising from our activities and is based on the internationally approved ‘Plan-Do-Check-Act’ process. This ensures we have the philosophy, procedures and methods in place to manage significant environmental risks throughout the life cycle of our projects.

As a provider of managed solutions to our clients in the UK’s Continental Shelf we fulfil the role of ‘Operator’ on behalf of the asset owner. As a result, our EMS has been designed to support our operating responsibilities:

- The environmental goals for the prevention and elimination of pollution from offshore sources and the protection and conservation of the maritime area against other adverse effects of offshore activities
- Provision of trained emergency and oil spill responders and specialist emergency response facilities
- Continual improvement in environmental performance

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Our vision is to reach
**Horizon Zero; a future
with no safety incidents**

THINKING DIFFERENTLY ABOUT DELIVERY

As a leading provider of services to the global energy industry, we design, build, operate and maintain energy facilities.

We think differently about delivery. By providing standalone or integrated services we align our approach to meet our clients' operating strategies and project objectives, unlocking significant value.

One example of this is our innovative Operator model, which has evolved from the Duty Holder service we pioneered in 1997, where we take responsibility for the Safety Case on behalf of a client.

OUR JOURNEY TO NET ZERO

Never before have we had such awareness of the importance of sustainability. Petrofac has a duty of care to do all we can to put this awareness into action and support our clients to accelerate the energy transition.

We are committed to reaching Net Zero in our Scope 1 and 2 emissions by 2030* and have been driving decarbonisation across our supply chain. We will always work with the Operator to help with their ESG goals and objectives, which is not limited to the emissions reductions only, but to energy, water and material use across the operations, maximising local sourcing and implementing a circular economic approach.

Our Net Zero strategy of ‘Reduce, Transform, Enable’ will focus the business on three areas, where we can control it:

- **Reduce** – cut our emissions by implementing energy efficiencies and low carbon strategies on sites and operations, optimising our operations and methods of construction, and advancing flare and venting reduction and carbon abatement plans
- **Transform** – adopt new technologies such as phasing in hybrid and electric vehicles on site, decarbonising our heating and cooling systems by switching to renewable electricity where available, and fitting smart building technology in our offices to maximise energy efficiency
- **Enable** – support our clients, partners and suppliers in their lower carbon ambitions, enable flexible and agile working practices, continue to embed emission reduction targets in management scorecards, and incentivise our staff to be advocates for net zero

PETROFAC LIMITED ENVIRONMENTAL POLICY

Vision

Petrofac will be recognised as a company that maximises energy efficiency, minimises greenhouse gas emissions from its activities and conducts business in an environmentally responsible manner.

Commitment

The Petrofac Board of Directors has ultimate responsibility for environmental performance and is committed to the achievement of environmental excellence. Petrofac and its business units are therefore committed to:

- conducting its business in an environmentally responsible manner, consistent with its ‘Horizon Zero’ initiative which aims to eliminate all incidents within the company;
- promoting a strong culture of leadership in environmental matters;
- encouraging all employees to share our environmental commitments and take personal responsibility for protecting the environment;
- complying with all applicable environmental laws, regulations, relevant standards, and compliance obligations;
- minimising our impact on the environment through pollution prevention, minimising waste and emissions and the efficient use of energy and other natural resources;
- support international and national initiatives to address climate change and taking actions to reduce greenhouse gas emissions;
- transparency in the reporting of the Company’s environmental performance and sharing of knowledge; and
- setting objectives and targets for continual improvement with auditing and monitoring of performance.

Responsibility and implementation

Environmental protection is a line responsibility that starts with the Group Chief Executive and flows down through the line management structure to front line employees performing work. Every leader at Petrofac is responsible for proactively leading the management of risks to the environment with their teams. Every Petrofac employee is responsible for making themselves aware of the risks to the environment in their work area and to proactively play their part in reducing these risks. All employees are empowered to speak up if they have any environmental concerns.



Tareq Kawash
Group Chief Executive

Objectives

To meet this commitment at Group level, Petrofac will:

- develop and maintain Petrofac minimum standards and expectations;
- publish regular performance reports and openly discuss our environmental performance with internal and external stakeholders; and
- periodically review the suitability and effectiveness of this policy, our management systems, targets and objectives.

Each Petrofac business unit will:

- provide suitable resources for the protection of the environment;
- develop and maintain environmental management systems that comply with ISO 14001, the International Standard for Environmental Management Systems;
- provide appropriate training to all employees to enable them to carry out their work with due respect and care for the environment; and
- engage with clients, contractors and suppliers to deliver a high standard of environmental performance.



OUR OPERATOR MODELS

Following the introduction of the 2015 Safety Case Regulations, our outsourced Duty Holder model evolved to incorporate Installation Operator (including Duty Holder) responsibility, to manage the environmental aspects of an installation.

Responsibility for wells and pipelines (Well Operator and Pipeline Operator) can be combined within one outsourced model called Service Operator.

WELL OPERATOR

CalEnergy, NEO, Prax, and Serica Energy

During 2024, Petrofac acted as the appointed Well Operator for multiple well operation campaigns across the UKCS, covering new development drilling and abandonment activities. In addition, Petrofac are the appointed Well Operator for multiple producing wells for CalEnergy, NEO, Prax and Serica Energy along with suspended wells for Ithaca and Anasuria Hibiscus UK.

INSTALLATION OPERATOR

Hewett, Irish Sea Pioneer, Kittiwake platforms

During 2024, our Installation Operator portfolio included the Hewett Complex, the Irish Sea Pioneer, and Kittiwake.

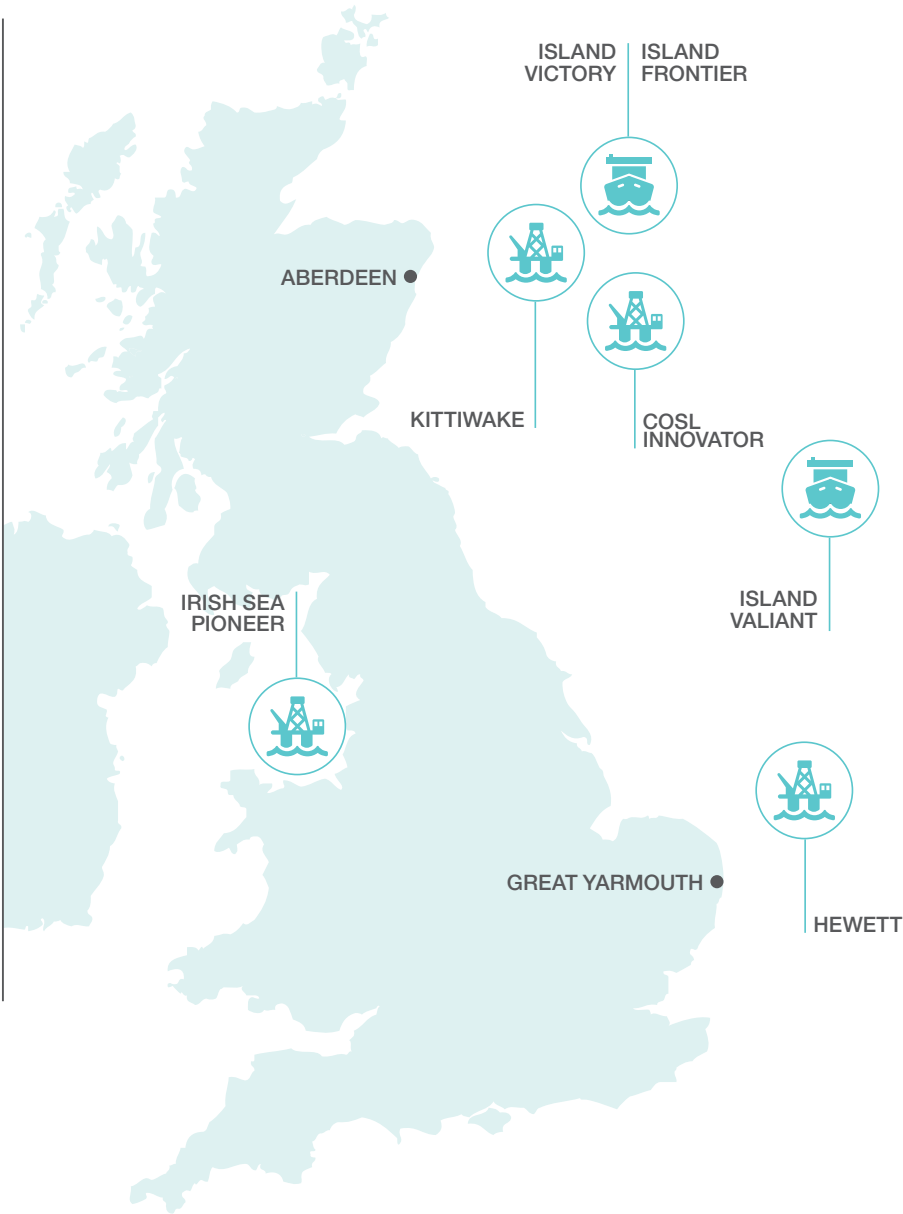
OUR OFFSHORE OPERATIONS

On behalf of their owners, we currently operate a range of platforms and undertake offshore oil and gas production activities including:

- Non-producing intervention vessel operation
- Oil and gas production platform operation
- Late-life platform operations
- Drilling activities with third-party rig provision
- Asset decommissioning

Under the requirements of this disclosure, the UKCS Operator responsibilities and UKCS assets highlighted within this statement include:

- **Service Operator (including Installation Operator) – Irish Sea Pioneer, Hewett, and Kittiwake.**
- **Well Operator - IOG, NEO, Prax, Serica Energy, Ithaca and Anasuria Hibiscus UK**



WELL OPERATOR



COSL Innovator

Petrofac was the appointed Well Operator, on behalf of Licensee Serica, for the GE05 well in the central North Sea. The Innovator semi-submersible drilling rig, owned by COSL Drilling Europe, carried out the work in the Gannet field in 2024.



Island Valiant

Petrofac was the appointed Well Operator, on behalf of the licensee NEO, for wellhead severance work in the central North Sea. The Island Innovator, an offshore subsea construction vessel, carried out the work at the Affleck Well.

WELL OPERATOR



Island Victory

Petrofac was the appointed Well Operator, on behalf of the licensee NEO, for the recovery of a Conductor Anchor Node (CAN) in the central North Sea.

The Island Victory, an offshore subsea construction vessel, carried out the work at the Leverett Well in March 2024.



Island Frontier

A further recovery of the Conductor Anchor Node was undertaken by the Island Frontier, an offshore subsea construction vessel and carried out at the Leverett Well in August 2024.

SERVICE OPERATOR (INCLUDING INSTALLATION OPERATOR)



Hewett

Located in the Southern North Sea, there are four platforms: The Hewett Complex (48/29Q, AP and A-FTP), 48/29 B, 48/29 C and 52/5A.

The Hewett field ceased the export of natural gas at the end of December 2020. Since this cessation, the process of decommissioning the assets has begun in preparation for their removal for disposal onshore.

Installations 48/29B and 48/29C are currently in lighthouse mode and 52/5A has been fully removed



Kittiwake

The Kittiwake Alpha is a fixed steel jacket platform in the Central North Sea owned by EnQuest.

Petrofac have been the Duty Holder for the Kittiwake Alpha since 2004, in June 2017 Petrofac became Installation Operator and assumed responsibility for the environmental performance for asset.



Irish Sea Pioneer

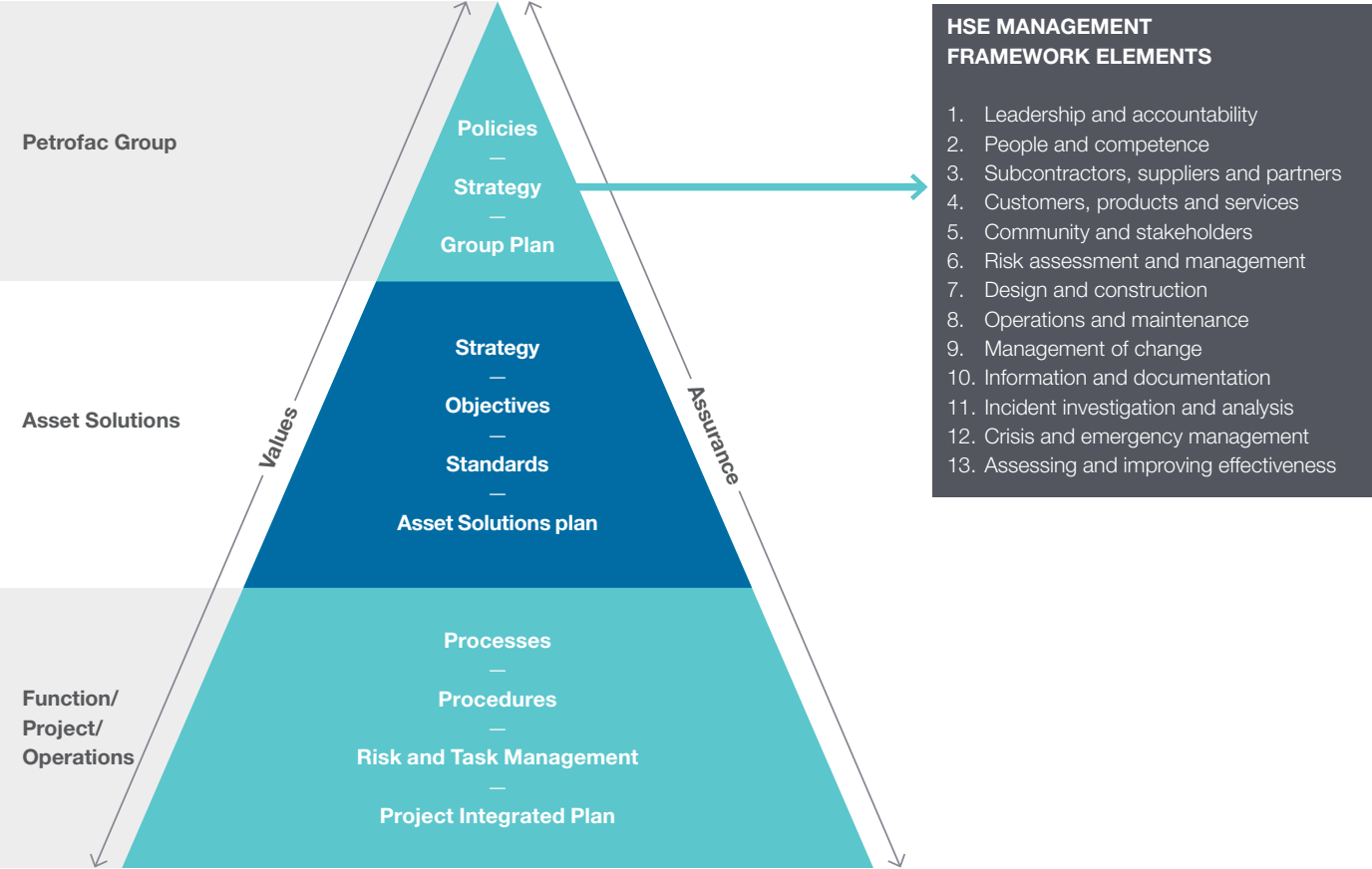
Petrofac has been Installation Operator of the Irish Sea Pioneer since 2015, prior to which Petrofac had been Duty Holder of the asset since 2006.

The non-producing mobile platform is owned by ENI, Liverpool Bay and provides intervention services to the ENI operations in the Liverpool Bay area of operations.

ENVIRONMENTAL MANAGEMENT SYSTEM

As part of our Global Management System (GMS), our EMS is certified to the ISO 14001:2015 International Standard, and complies with the Oil Spill Prevention, Administration and Response Fund. It is governed by the Petrofac Group Health, Safety and Environment Management Strategy.

HSE MANAGEMENT STRATEGY



Our EMS is flexible enough to maintain continuity with existing practices during the transfer of platforms to the Petrofac system, whilst taking on board best practice where identified which is then shared across other assets.

MANAGING OUR IMPACT ON THE ENVIRONMENT

Specific areas of our offshore operations require daily focus to ensure their impact on the environment is managed effectively. These include:

DISCHARGES TO SEA

OIL IN WATER

Water is extracted from wells, along with oil and gas. The water, known as produced water, is then separated from the oil and treated. Although treatment removes most of the oil from the water, residual traces are still discharged. These traces are regulated and released under permitted conditions.

DRILL CUTTINGS DISCHARGE

Drill cuttings and fluids discharged from drilling operations can also contain residual oil associated with the formation.

CHEMICAL DISCHARGES

Prior to approval and discharge for use offshore, chemicals are subjected to a risk assessment. The potential impact from chemical discharges is graded using the ranking systems (Chemical Hazard And Risk Management- CHARM and The OCNS Grouping):

COLOUR BANDING		INITIAL OFFSHORE CHEMICAL NOTIFICATION SCHEME (OCNS) GROUPING
GOLD	Lowest hazard ↓ Highest hazard	Initial grouping
SILVER		A
WHITE		B
BLUE		C
ORANGE		D
PURPLE		E

ATMOSPHERIC EMISSIONS

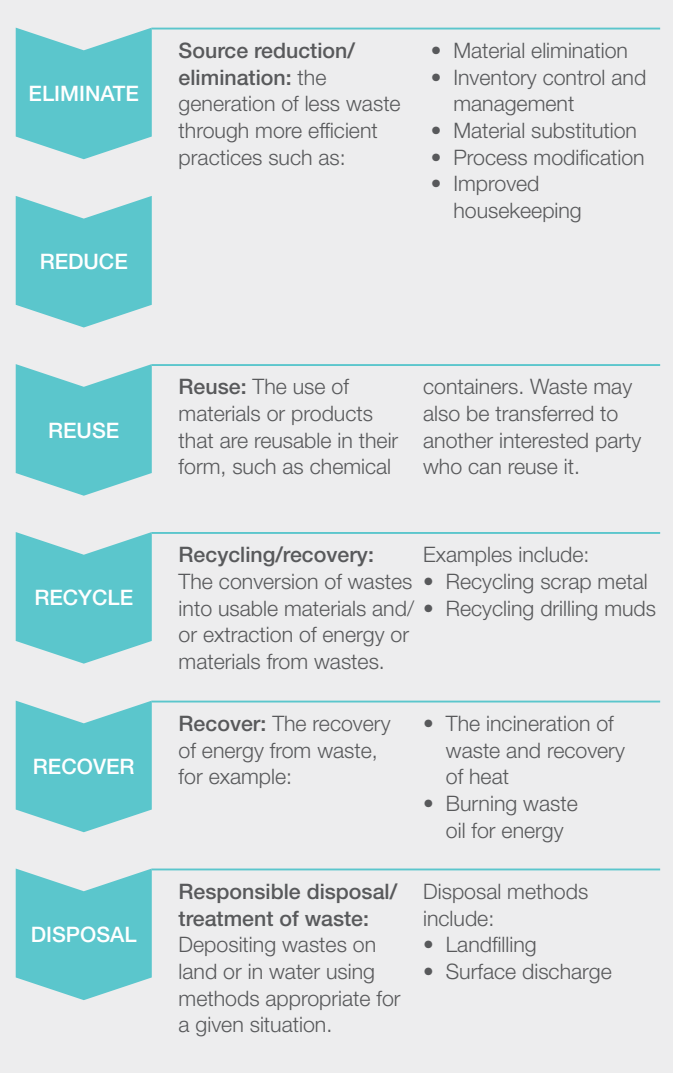
The combustion of diesel and gas to generate power and the burning of flare gas creates atmospheric emissions of Carbon Dioxide (CO₂) and other combustion products including:

- Nitrous oxides
- Sulphurous oxides
- Carbon Monoxide (CO)
- Methane (CH₄)
- Other Volatile Organic Compounds (VOCs)

During activities on the assets, refrigerant gases are used offshore, primarily to support living conditions and equipment cooling. This activity is regulated and reported on annually.

WASTE MANAGEMENT

Waste generated offshore is managed to allow maximum reuse or recycling of materials before being treated, incinerated or disposed to landfill. As a part of waste management process, we have been strongly encouraging application of circular economy Petrofac follows the waste management hierarchy below:



PETROLEUM OPERATIONS NOTICE AND NON-COMPLIANCE REPORTING

All notices and non-compliance are recorded within Petrofac's incident management system, detailing the circumstances, investigation, outcomes and actions. The system is also used for lesson sharing and incident trending to assist with continuous improvement.

PETROLEUM OPERATIONS NOTICE

Any spill to sea of oil or chemical is reported to the Department for Energy Security and Net Zero (DESNZ) using the Integrated Reporting Service (IRS) PON 1 form.

The loss of any objects to sea which may have an impact on the environment or sea users are reported to DESNZ using PON2 form via the IRS.

NON-COMPLIANCE

A non-compliance against any of the permit conditions is reported using the appropriate form in the IRS.

ENVIRONMENTAL OBJECTIVES AND TARGETS

2024 OBJECTIVES	2024 ACHIEVEMENTS
Maintain ISO 14001 Certification across all operated assets and extend into new areas as operational changes require	Asset Solution Business Unit successfully underwent ISO14001 surveillance and focus visits in 2024. ISO14001 Certificate was streamlined with other ISO certificates held by AS
Follow Net Zero strategy and focus on sustainability aiming for low carbon solutions and energy efficiency where applicable	Net Zero strategy has been applied as a part of AS operations and bids/ tenders. We continuously focus on sustainable and low carbon solutions- engineering design optimizing energy/ material requirements and designing out waste, operating combustion equipment at the most efficient rate, monitoring energy consumption
Deliver ESOS report on time	ESOS report and subsequent Action Plan were all submitted on time and with no delays
Conduct operations with minimal impact on the environment	Petrofac reported no major environmental incidents or events in 2024. We have been ensuring all operations are managed with all necessary mitigations in place and awareness to prevent any negative environmental impact.
Reduce waste and follow circular economy philosophy	Petrofac actively did seek waste reduction where possible engaging with the supply chain and other vendors, participating in numerous initiatives, looking at case studies regarding elimination, circulation and regeneration.

CONTINUOUS IMPROVEMENT

In 2025 Petrofac will continue to:

Recertify ISO14001 standard for Asset Solutions	Promote sustainability across the company and sites by maintaining clear communication and objectives	Improve monitoring and reporting of legal compliance and environmental key indicators, maintain audit and inspection schedule
Continue to increase environmental awareness throughout the operations life cycle	Proactively engage with all regulators and external stakeholders	



ENVIRONMENTAL PERFORMANCE

HEWETT

Various environmental permits are in place for the Hewett Field Complex (Blocks 48/29AP, 48/29B, 48/29C and 52/5A). Depending on the decommissioning stage of block, the following type of permit/s may still be in place, oily-water discharges to sea, offshore chemical use and discharge, atmospheric emissions from power generation, and ‘consent to locate’.

For Block 48/29AP, all of the relevant permits are still in place. Meanwhile, Block 48/29B has had its chemical and oil discharge permits surrendered with only ‘Consent To Locate’ still in place. Block 48/29C has retained its Chemical Permit and 'Consent to Locate' while the oil discharge permit has been surrendered. Lastly for Block 52/5A, all permits have been surrendered.

DISCHARGES TO SEA

OIL IN PRODUCED WATER

No produced water was discharged to sea in 2024. During preparations for decommissioning, fluids from cleaning and flushing activities across the platforms were injected into the platform wells (i.e. 4,013 m³ of flushed water in September 2024), some of these were done under the licensee permits.

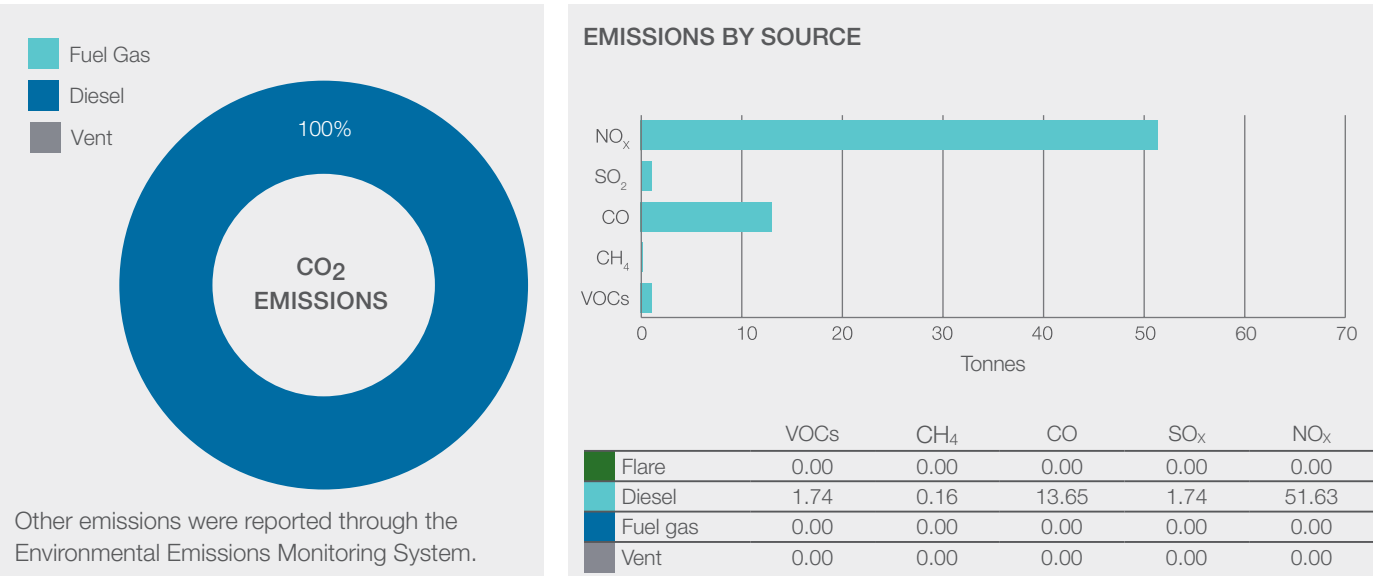
CHEMICAL USE AND DISCHARGE

Two of the chemicals used in Hewett are in ‘Gold’ category. The chemicals were not discharged into the sea. SFE-ED-02 (detergent) was discharged through PL-85 as re-injected down hole to well, while RO WS M7154 (well bore clean up chemical) was disposed through waste tanks (transferred to onshore disposal facility).

Chemical permits remain in place on some platforms (i.e., 48/29AP and C) for future decommissioning activities and contingency purposes for planned activities.

DISCHARGES TO ATMOSPHERE

Power generation is the main source of atmospheric emissions. 1,958 tonnes of CO₂ emissions were verified for greenhouse gas reporting purposes. Other emissions were reported through the Environmental Emissions Monitoring System.

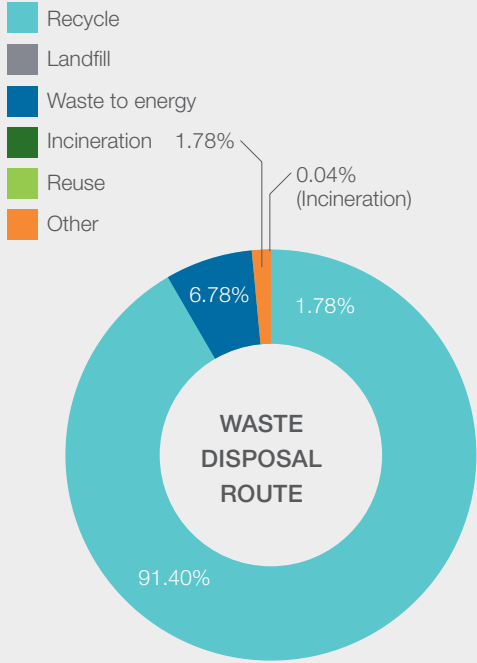


There are four hydrochlorofluorocarbon (HCFC) refrigerant and three non-HCFC refrigerant compound in use on the Hewett Complex. The inventory and emission details are monitored and reported opposite:

Compound	On facility (kg)	Emitted (kg)	CO ₂ equivalent factor (kg)	CO ₂ equivalent (t)
HFC-134a	3.43	0.00	1,430	0
HFC-227ea	12	0.00	3,220	0
HFC-407c	4.0	0.00	1,774	0
HFC-422d	6.50	0.00	2,729	0
HC-600a (Isobutane)	2.79	0.00	3	0
R290	0.10	0.00	3	0
R290	0.32	0.00	3	0

WASTE MANAGEMENT

450.5 tonnes of waste were managed onshore. A large part of the waste disposed came from the decommissioning activities which will only increase going forward. The disposal routes are charted below:



REPORTS AND NOTIFICATION

During 2024 there was one unpermitted release of chemical reported (PON1) and closed out through the Integrated Reporting Service (IRS). There were no reports of unpermitted oil release.

PON 1 Notification details

Activity	Oil/Chemical type	Discharge (t)
Changing out a hose (at crane engine room), when the hydraulic oil spilled causing the loss to sea	Hydraulic oil	0.005

During 2024, there were nine non-compliances with the consent to locate permit (PON10) related mostly to the unmanned and lighthouse mode installations, which were closed out through the Integrated Reporting Service (IRS).

During 2024, there was one reported non-conformance with the chemical permit (OCR) which was closed out through the Integrated Reporting Service (IRS).

OCR Non-conformance details

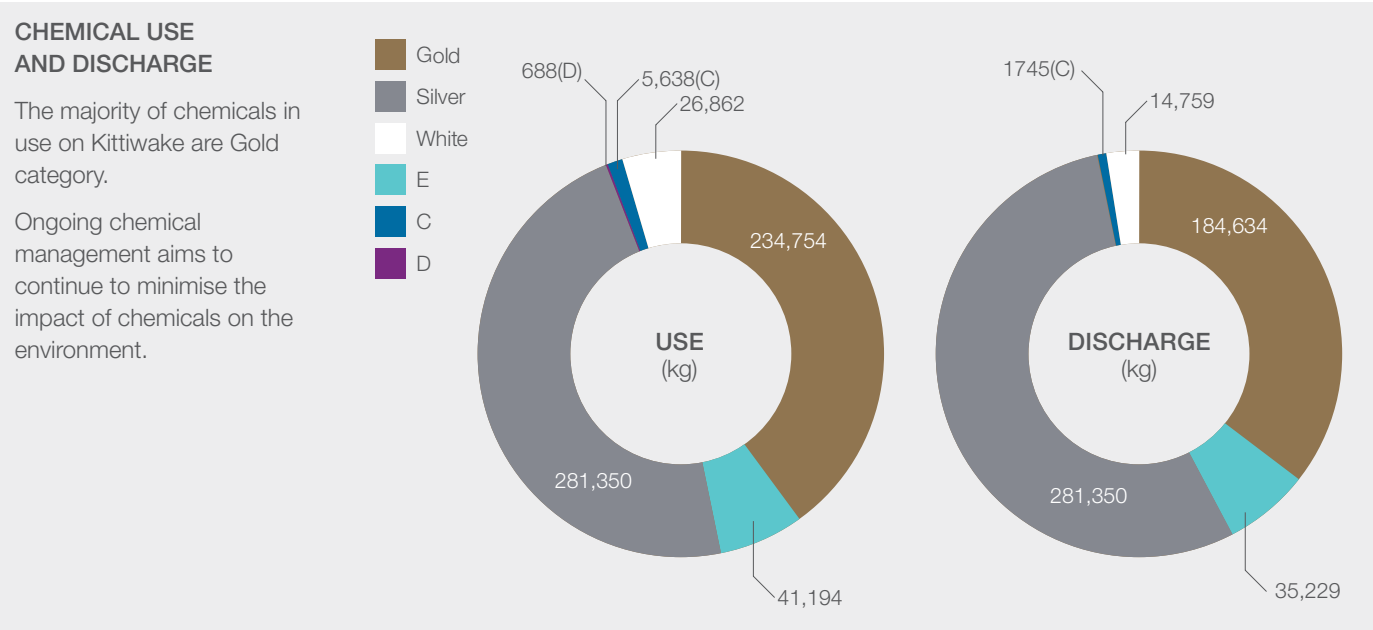
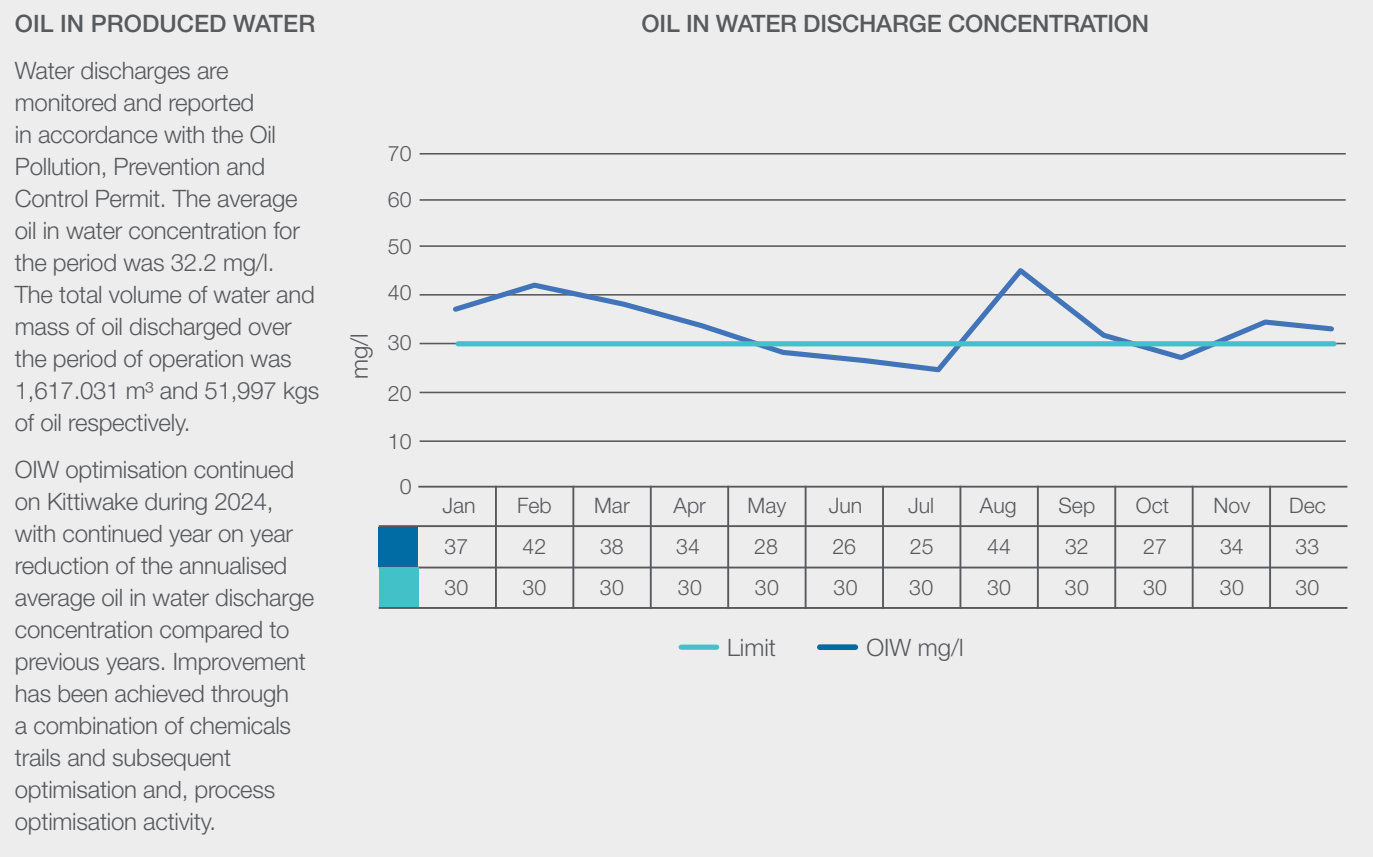
Incident Description
Q1 2024- The quantity of chemical SFE-ED-02 used exceeded the quantity in the permit application by more than 10%

ENVIRONMENTAL PERFORMANCE

KITTIWAKE

The Petrofac environmental permits in place for the Kittiwake are those associated with oily water discharges to sea, offshore chemical use and discharge and atmospheric emissions from power generation.

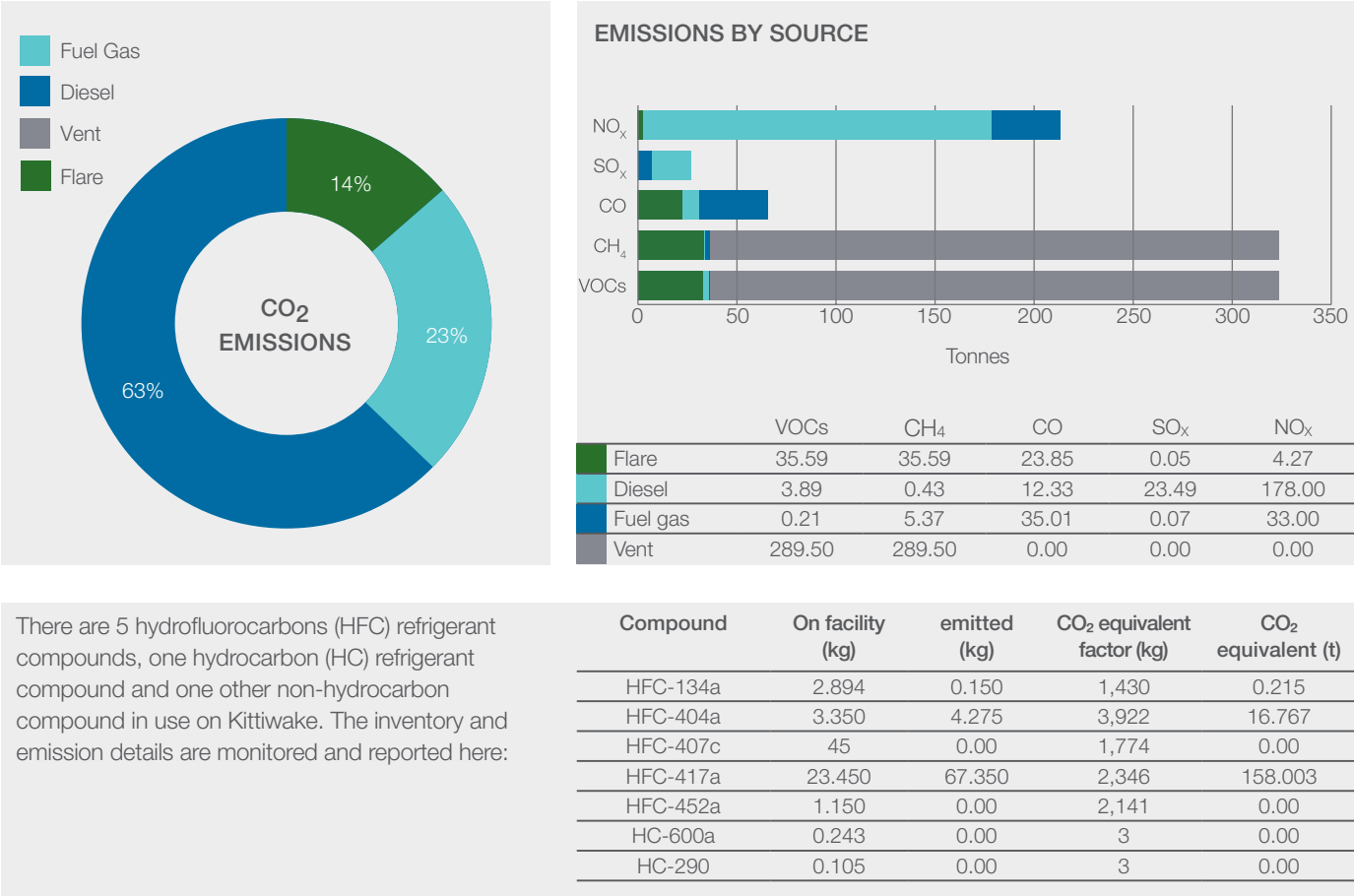
DISCHARGES TO SEA



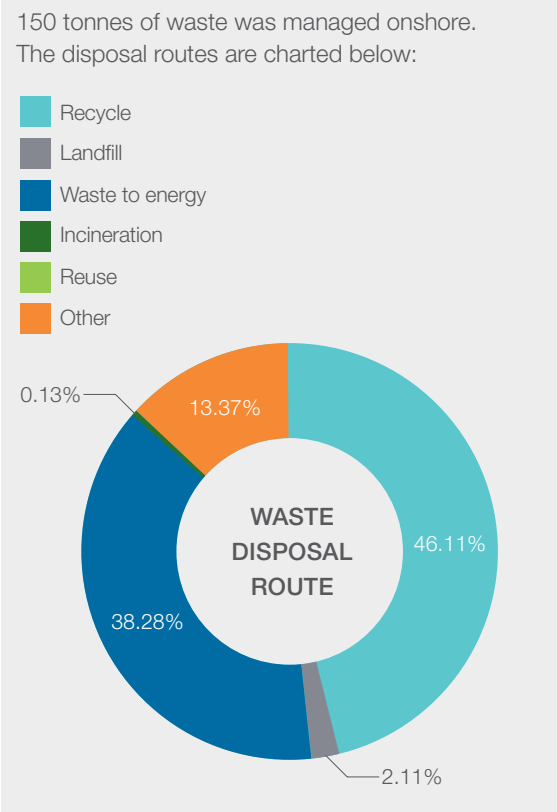
DISCHARGES TO ATMOSPHERE

Power generation is the main source of atmospheric emissions. Other sources are flaring and venting gas.

66,400 tonnes of CO₂ emissions were verified for greenhouse gas reporting purposes. Other emissions were reported through the Environmental Emissions Monitoring System.



WASTE MANAGEMENT



REPORTS AND NOTIFICATION

During 2024 there was one accidental release of oil to sea (PON1 event), thirteen oily discharge permit non-compliant events related to threshold exceedances and, one combustion permit non-compliance due to the use of a wrong emissions conversion factor. All incidents were managed out through the IRS system.

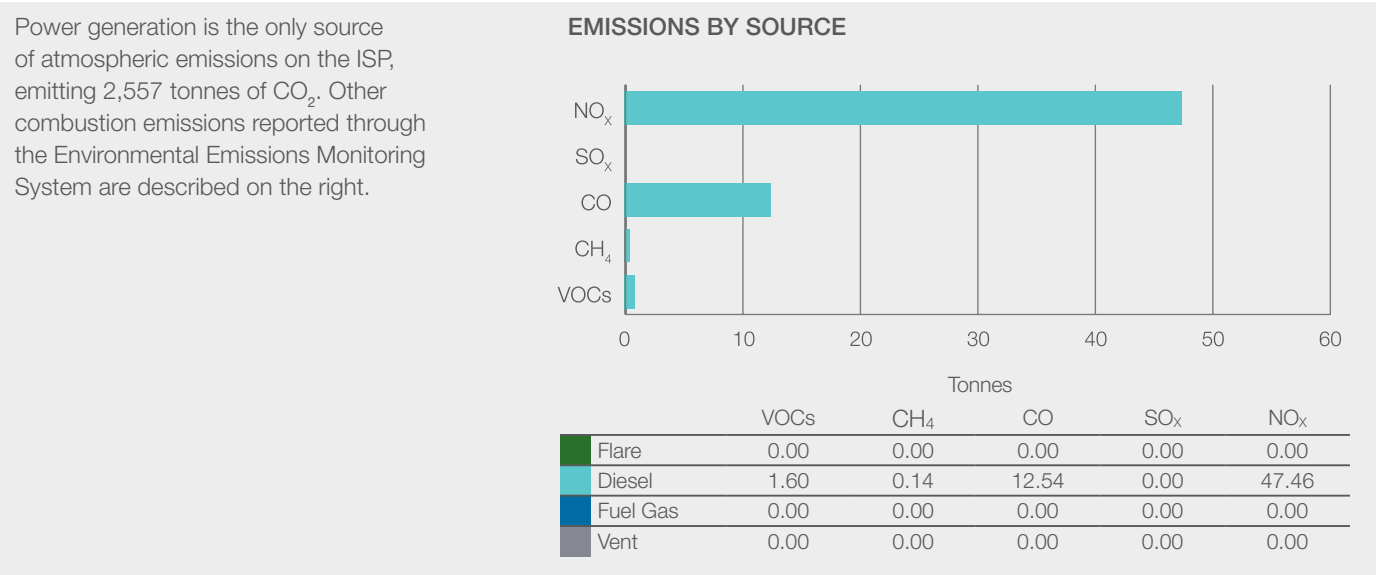
Permit	Non-Compliance	No.
OPPC (Oil Pollution Prevention and Control Reg 2005)	Oil in water 30mg/l monthly threshold excursion	8
	Oil in water 100mg/l threshold excursion	5
Offshore Combustion Installation (Pollution Prevention and Control) Regulations 2013	SOx annual forecast exceedance	1

ENVIRONMENTAL PERFORMANCE

IRISH SEA PIONEER (ISP)

The environmental permits in place for 2024 are associated with atmospheric emissions from power generation.

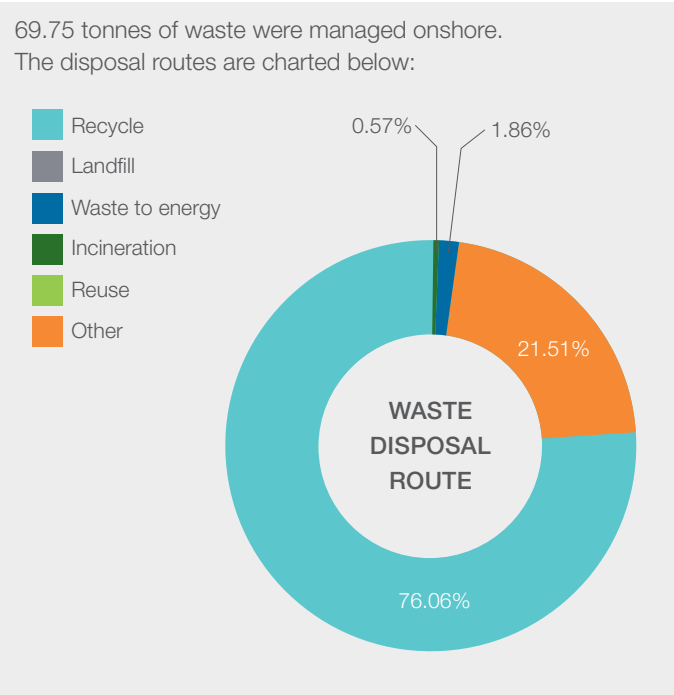
DISCHARGES TO ATMOSPHERE



There are two hydrochlorofluorocarbon (HCFC) refrigerant components in use on the ISP. The inventory and emission details are monitored and reported:

Compound	On facility (kg)	Emitted (kg)	CO ₂ equivalent factor (kg)	CO ₂ equivalent (t)
HFC-134a	50.00	49	1,430	70
HFC-404a	24.00	0	3,922	0

WASTE MANAGEMENT



REPORTS AND NOTIFICATION

During 2024 there were no reported unpermitted releases and no permit non-compliances.

ENVIRONMENTAL PERFORMANCE

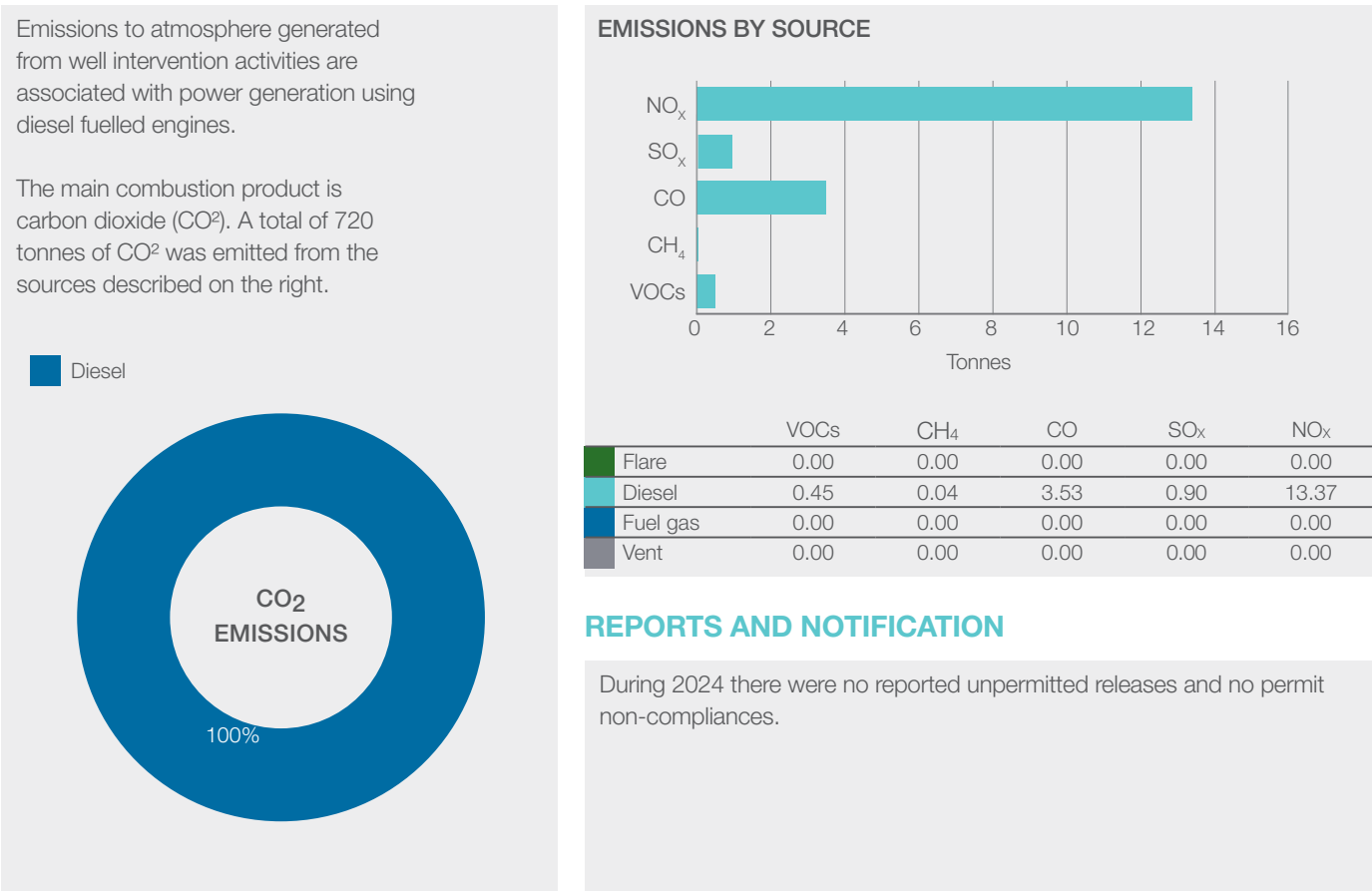
ISLAND FRONTIER

The Island frontier conducted a second recovery of the Conductor Anchor Node in the central North Sea in August 2024.

DISCHARGES TO SEA

OIL IN PRODUCED WATER
N/A
CHEMICAL USE AND DISCHARGE
N/A

DISCHARGES TO ATMOSPHERE



REPORTS AND NOTIFICATION

During 2024 there were no reported unpermitted releases and no permit non-compliances.

ENVIRONMENTAL PERFORMANCE

ISLAND VALIANT

The Island Valiant undertook a wellhead severance operation in the central North Sea in July 2024.

DISCHARGES TO SEA

OIL IN PRODUCED WATER
N/A
CHEMICAL USE AND DISCHARGE
N/A

DISCHARGES TO ATMOSPHERE

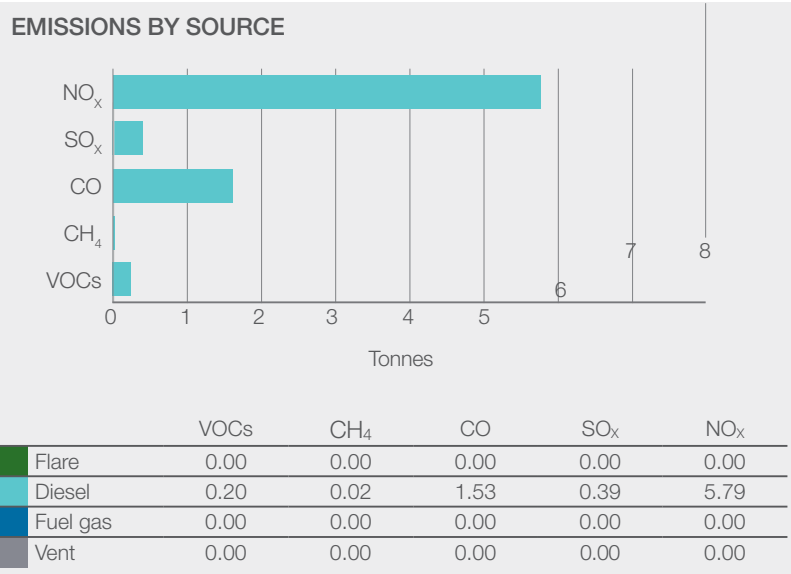
Emissions to atmosphere generated from well intervention activities are associated with power generation using diesel fuelled engines.

The main combustion product is carbon dioxide (CO²). A total of 312 tonnes of CO² was emitted from the sources described on the right

Diesel

CO₂ EMISSIONS

100%



REPORTS AND NOTIFICATION

During 2024 there were no reported unpermitted releases and no permit non-compliances.

ENVIRONMENTAL PERFORMANCE

ISLAND VICTORY

The Island Victory undertook a recovery operation of a Conductor Anchor Node in the central North Sea in March 2024.

DISCHARGES TO SEA

OIL IN PRODUCED WATER
N/A
CHEMICAL USE AND DISCHARGE
N/A

DISCHARGES TO ATMOSPHERE

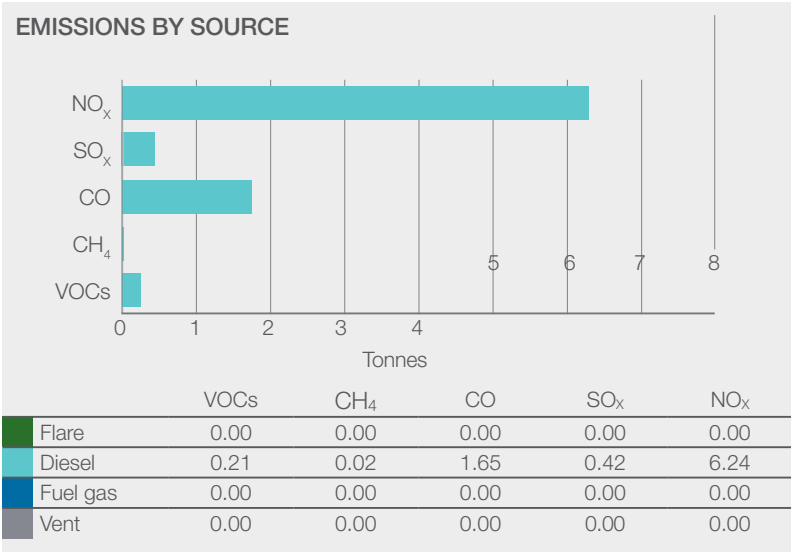
Emissions to atmosphere generated from well intervention activities are associated with power generation using diesel fuelled engines.

The main combustion product is carbon dioxide (CO²). A total of 336 tonnes of CO² was emitted from the sources described on the right

Diesel

CO₂ EMISSIONS

100%



REPORTS AND NOTIFICATION

During its activities for Petrofac, three PON1 events were submitted:

PON1	Oil/Chemical type	Quantity (kg)
Release of hydraulic fluid from ROV terminator control skid	Hydraulic fluid	20
Release of hydraulic fluid from terminator tool	Hydraulic fluid	0.5
ROV observed release from terminator tool skid	Hydraulic fluid	0.001

ENVIRONMENTAL PERFORMANCE

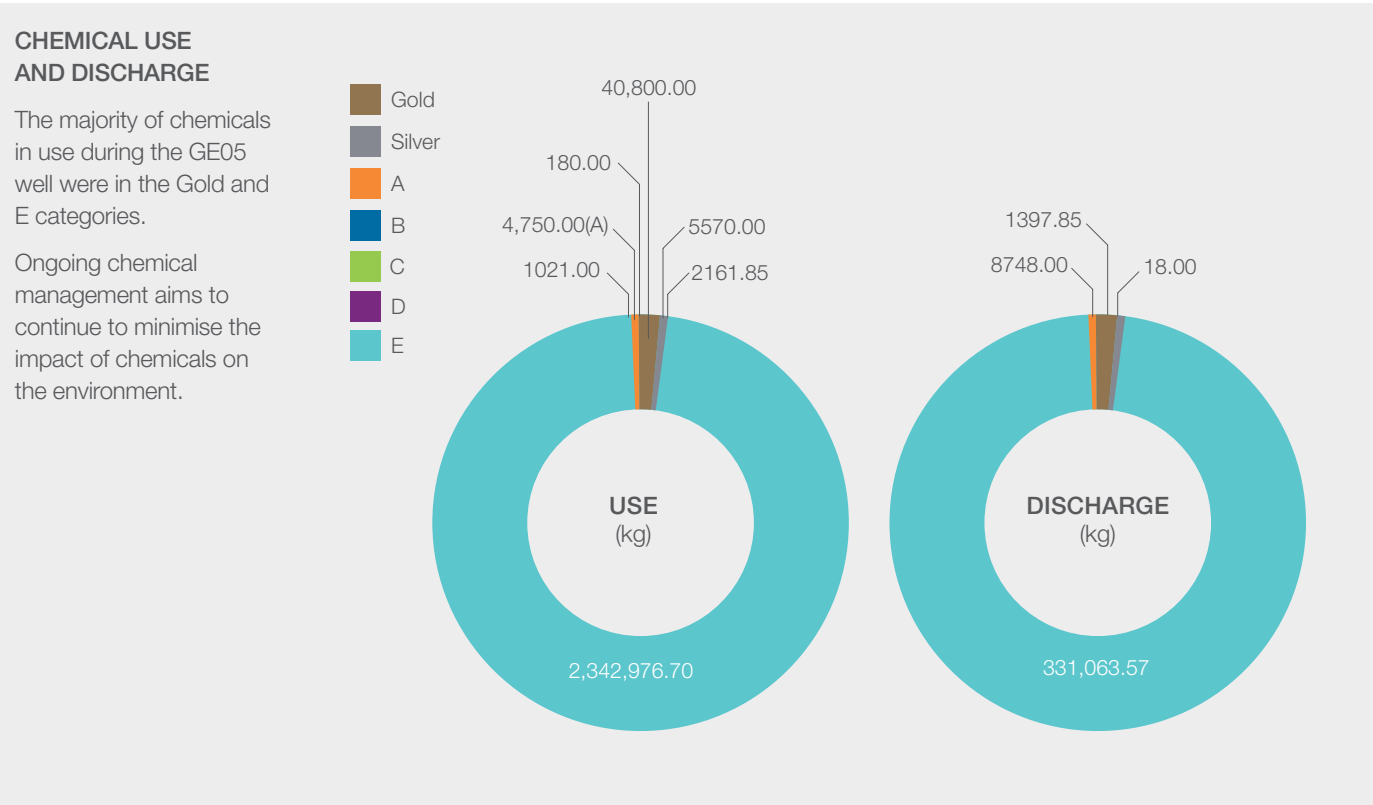
COSL INNOVATOR

The Innovator semi-submersible drilling rig is undertaking a multi-operator/multi-well campaign in the central North Sea between April 2024 and May 2025. Petrofac was the appointed well operator for the Gannet E 05 (GE05) well in the Gannet field in 2024.

DISCHARGES TO SEA

A total of 425m³ of Oil Based Mud (OBM) contaminated slops were discharged to sea during GE05 operations. OBM contaminated cuttings were returned to shore for processing, whilst the OBM itself was separated for reuse. During various operations, slops would become contaminated with OBM and these slops were processed through a slops treatment unit to reduce the level of base oil contamination to less than 30mg/l. In total 12.75kg of base oil was discharged

	Volume of waste stream discharged (m³)	Maximum concentration of base oil discharged (mg/l)	Maximum concentration of base oil discharged (mg/l)
Treated OBM contaminated slops	425	30	12.75





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