



Seagull Petroleum and Mining

Environmental Policy

Effective as of October 02, 2018



Environmental Policy

At Seagull Petroleum and Mining, we believe that the minimising the impact of our operations on the environment is of primary importance to us. Understanding, controlling and adequately responding to environmental risks is a part of Seagull Petroleum and Mining's environmental management strategy. This Environmental Policy mandates that all employees and contractors assume leadership roles in mitigating the environmental pollution arising in their pursuit of business aspirations and activities. Seagull Petroleum and Mining considers the protection of the environment an integral code of business strategy and practices.

Seagull Petroleum and Mining will achieve its environmental goals through:

- Assessing the environmental consequences of its operations on the local environment to limit disturbance;
- Operating in a safe manner to avoid spills, leaks or accidental discharges of polluting materials;
- Limiting the quantities of wastes and other discharges by handling them in a responsible manner; and
- Maintaining pollution contingency plans and the capability to respond in an emergency.
- Our commitment to complying with all the applicable environmental related legal and statutory requirements, and in particular the "Zero Discharge Policy";
- Assessment of potential environmental risks and impacts for the new projects and on-going operations to determine suitable environmental management plan frameworks;
- Completing implementation of environmental monitoring plan (EMP) and environmental mitigations at work to reduce potential environmental impacts;
- Integrate responsible environmental leadership in the planning and decision-making process;
- Adopting the "3-R" (reduce, reuse and recycle) philosophy for all types of wastes toward prevention of pollution and degradation of environment;
- Disposal of inevitable wastes in line with all regulatory requirements and industry best practices;
- Evaluate current technologies, products and raw materials for waste minimisation and review proper handling, storage and disposal techniques for existing wastes;
- Promoting green procurement to the extent possible wherever applicable;
- Communicate the environmental policy to all employees, business associates and other stakeholders and ensure that the policy is available to the public;

To ensure compliance with the Company's environmental policy, Seagull Petroleum and Mining must:

- Consider the environmental impact of all of its activities;
- Ensure that the environmental goals and standards are understood and followed at all levels throughout the Company;
- Train its employees to carry out their work with due respect and care for the environment;
- Ensure that its contractors follow the Company's environmental practices in performing their work;
- Report all environmental related incidents and investigate and analyse them to prevent recurrence;
- Perform a regular audit of its compliance with the Company's environmental policy; and
- Comply with all applicable standards of the international oil industry, in addition to the laws and regulations of the states in which the Company is present.

Helping to fulfil these goals is the responsibility of everyone who works at Seagull Petroleum and Mining.

Chief Executive Officer