

FREEDOM OF INFORMATION ACT

The Public's Right to Access Information under the Freedom of Information Act relating to Heritage Petroleum Company Limited and its Operations

FOIA Public Statement 2022

Under the Freedom of Information Act, Chapter 22:02 ("FOIA"), Heritage Petroleum Company Limited ("Heritage") is required by law to publish this statement, which lists the documents and information generally available to the public and how members of the public can set out to obtain same. Heritage last published its statement in April 2022. This statement has been updated reflecting changes at Heritage for the year 2022.

The FOIA gives members of the public:

1. a legal right for each person to access information held by Heritage;
2. a legal right for each person to have personal information relating to himself/herself amended where it is held by Heritage and such information is incomplete, incorrect or misleading;
3. a legal right to obtain reasons for adverse decisions made regarding an applicant's request for information under the FOIA; and
4. a legal right to complain to the Ombudsman and to apply to the High Court for judicial review to challenge adverse decisions made under the FOIA.

The following information satisfies the requirements of the FOIA and Heritage publishes the following statement as approved by the Minister of Energy and Energy Industries:

SECTION 7 STATEMENTS

SECTION 7(1)(a)(i)

Heritage is a wholly owned subsidiary of Trinidad Petroleum Holdings Limited which is wholly owned by the State. Heritage was incorporated on 5th October 2018 as a limited liability company under the Companies Act, Chapter 81:01 of the laws of Trinidad and Tobago, with its registered office at #9 Queen's Park West, Port of Spain. It has one subsidiary, Trinidad and Tobago Marine Petroleum Company Limited, in which it has the majority shareholding. Heritage's main area of business activity is exploration, development, production and marketing of crude oil. As such our business model focuses on safe, responsible, and efficient exploration, production, and marketing of crude oil to the international market.

Corporate Information

Heritage is governed by a Board of Directors appointed by the company's shareholder, Trinidad Petroleum Holdings Limited. The following persons are on the said board:

- Mr. Michael A.A. Quamina S.C. - Chairman
- Mr. Reynold Ajodhasingh - Deputy Chairman
- Mr. Vincent Bartholomew
- Mr. Peter Clarke
- Mr. Newman George
- Mr. Joel Harding
- Mr. Selwyn Lashley
- Mr. George Leonard Lewis
- Mr. Antonio Ross
- Mr. Reza Salim
- Mr. Ryan Toby

There are five (5) Board Sub-Committees:

- The Audit & Risk Sub-committee;
- The Finance, Investment & Strategy Sub-committee;
- Human Resources and Corporate Communications Sub-committee;
- The Operations & Safety Sub-committee; and
- The Procurement & Tenders Sub-committee.

Company Structure

Heritage is divided into four (4) main Business Units and twelve (12) support functions:

- **Offshore Business Unit (Offshore Central and Offshore South West):** This Business Unit is charged with the responsibility of operating the company's offshore acreage in the southern Gulf of Paria.
- **Land Business Unit:** This Business Unit is charged with the responsibility of operating the company's onshore acreage primarily located in the southern part of Trinidad spanning from Galeota to Point Fortin.
- **Midstream Business Unit:** This Business Unit is charged with responsibility of handling all produced fluids (crude oil, natural gas, condensate and produced water) from the company's Land and Offshore operations, as well as crude oil, natural gas and condensate from joint venture, production alliances and third-party purchases, and processing to saleable quality for export, while maintaining our assets and ensuring projects are engineered to ensure same. In order to fulfill this mandate, this Unit operates and maintains a vast, intricate network of trunk pipelines spanning several hundred kilometers, as well as seven (7) Tank Farm facilities.
- **Business Development Unit:** This Business Unit is charged with the responsibility of managing all non-operated assets including joint ventures and sublicence agreements and pursuing and executing new business development opportunities for the company.
- **Engineering Department:** This department: (1) provides technical assurance within each engineering discipline, (2) is responsible for delivering complex and large-scale projects and (3) ensures that Process Safety fundamentals are applied across the business.
- **Drilling Department:** This department is responsible for executing drilling, workover, well servicing and well abandonment operations.
- **Logistics Department:** This department is responsible for the coordination of Marine Logistics, Land Logistics and the Company's Warehouse facilities.
- **Subsurface:** This department plans and assists in setting the direction on strategies to optimize production, enable production growth and achieve reserve replacement in a safe and cost effective manner and in alignment with the Company's overall business objectives.
- **Finance:** This department provides accounts payable and receivable, payroll, financial reporting, statutory reporting and compliance, treasury and risk, taxation, control and systems optimization, asset and value optimization, information and communications technology, property and administration. This Department also includes the Commercial Department that provides sales and purchase arrangements for crude oil and natural gas and other ancillary services.
- **Procurement Department:** This department provides procurement services to the Company.
- **Law Department:** This Support Unit provides legal and land management services.
- **Health, Safety, Environment Department (HSE):** This department provides oversight for health, safety and environment issues, and is broken down to provide support as it relates to Control of Work; Crisis and Continuity Management & Emergency Response; Environmental & Regulatory Compliance; Occupational Health and Operational HSE.
- **Security Department:** This department provides security management for the Company.

- **Human Resources Department:** This department provides recruitment and talent management; compensation and benefits; organizational development; performance and training; industrial and employee relations; and office management services.
- **Internal Audit Department:** This department provides independent, objective assurance and consulting services designed to add value and improve the Company's operations. The Unit assists the Company in accomplishing its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of Risk Management, Control, and Governance processes.
- **Corporate Communications Department:** This department is responsible for developing and maintaining a framework to build and manage the company's reputation supported by strong policies and rooted in transparency, accountability, fairness and responsibility to its stakeholders. Corporate Communications is also the main implementation arm for stakeholder engagement and social sustainability.

Heritage's Executive Leadership Team consists of the following positions:

- Chief Executive Officer;
- Chief Operating Officer;
- Chief Financial Officer;
- Chief Legal Counsel;
- Chief Procurement Officer;
- Chief Audit Executive;
- Offshore Leader;
- Drilling Leader;
- Land Leader;
- Midstream Leader;
- Engineering Leader;
- Subsurface Leader;
- Business Development Leader;
- HSE Leader;
- Human Resources Leader;
- Corporate Communications Manager; and
- Corporate Security Manager

Heritage has hired a total of 441 permanent employees as at December 31st, 2022. **Please see attached organizational chart for further details.**

Effect of Scope of Business on Members of the Public:

In the course of its business, Heritage considers feedback from members of the public but this does not have an impact in relation to the formulation of policy in or the administration of Heritage. The Company will engage in forms of stakeholder engagement as and when required.

SECTION 7(1) (a) (ii)

Categories of documents in the possession of Heritage:

Heritage maintains records that relate to its operations (exploration and production), administrative functions and its support services. These records are categorized as follows:

- 1. Corporate Documents**
 - a. Incorporation documents inclusive of bye-laws.
 - b. Minutes and reports of the Board and any committees of the Board.
 - c. Board Notes and other documents presented to the Board.
- 2. Correspondence with Corporation Sole, Line Ministry, Government and other State Agencies**
 - a. Communication with Ministries and other public authorities. e.g., reports to the Ministry of Energy and Energy Industries on operational performance, activities and issues of non-operated assets.
 - b. Reports to the Central Statistical Office and other governmental financial management institutions.
- 3. Committee Deliberations**
 - a. Minutes and reports of Committees.
 - b. Notes and other documents presented to the Committees.
- 4. Legal Activities**
 - a. Records of decisions, legislation, policies and procedures, contracts inclusive of documents relating to the transfer, licensing or leasing of lands.
 - b. Documents pertaining to litigation and other legal proceedings inclusive of intended legal action and decisions or judgements in relation to concluded matters.

5. Business Activities

- a. Business plans, proposals, reviews, reports.
- b. Records related to development, planning and general management of projects.
- c. Records relating to human resource management operations.
- d. Public relations records and files including bursaries, sponsorships, brochures, newsletters, photographs, maps, audio and visual material related to public relations activities.
- e. Records relating to information resource management facilities, services and technology.
- f. Records relating to marketing and business promotions.
- g. Performance and audit assessments and analyses.
- h. Consultancy, technical, valuation, assessment and various reports which support business decisions.
- i. Policies, procedures and manuals, e.g., safety manual, evacuation procedures.
- j. Speeches and presentations to public forums, conferences.
- k. Records related to the management of corporate events.
- l. Documents related to the management of non-operated assets.
- m. Procurement policies and procedures.

6. Financial and Accounting Operations

- a. Records related to budgeting, capital investments, financial planning and reporting, taxation, cash management, etc.
- b. Reports to Government, audited financial accounts laid in Parliament and other public financial entities.
- c. Accounting records.
- d. Records related to control and systems optimization.
- e. Annual Financial reports.

7. Commercial Activities

- a. Records related to vendors, contractors, bidders, joint ventures, purchasers, sellers and contract management.
- b. Records related to asset and value management.
- c. Strategy and Planning records.

8. Environment, Health, Safety

- a. Investigation reports related to reportable accidents.
- b. Register of incidents, accidents and reportable injuries.
- c. Records of monitoring of discharges and emissions.
- d. Operating Management Systems Policies & Procedures.
- e. Annual Risk Assessments.
- f. Medical/Health Surveillance.
- g. Training Records.
- h. Emergency/Evacuation Drill Reports.
- i. Confined Space Testing.
- j. HSSE performance of Leading and Lagging Key Performance Indicators.

9. Internal Audit

- a. Internal Audit Manual.
- b. Internal Audit training programmes.
- c. Internal Audit Plans and Reports.

SECTION 7(1) (a) (iii)

Documents prepared for publication and inspection:

If in print and available, the public may inspect or obtain copies of the following material by contacting the Corporate Communications Manager, Corporate Communications Department at 649-6751 Ext. 6699, Monday to Thursday from 8:00 am to 4:00 pm.

- a. Advertisements for Recruitment of Personnel.
- b. Advertisements for Procurement on behalf of Supply Chain Management Department.
- c. General information in the form of leaflets, brochures or the like on the Company and its operations.
- d. Audited Financial Statements.
- e. Speeches and presentations to public forums, conferences.
- f. Procurement/Tender rules and procedures.
- g. Information related to Corporate Credit Cards.
- h. RFPs to secure banking/brokerage services.

General information is also available on Heritage's website:

www.heritage.co.tt

SECTION 7(1) (a) (iv)

Documents available by way of subscription:

Heritage does not currently publish any documents that are available by way of subscription.

SECTION 7(1) (a) (v)

Procedure to be followed to access official documents under the FOIA:

1. How to request information

- All requests for access to documents under the FOIA that are not readily available in the public domain shall be made on the Request for Access to Official Documents(s) Form that is available from the Designated Officer or from the FOIA Unit (in person or via its website: www.foia.gov.tt).
- Queries for amendments to documents containing personal information about the applicant are to be directed to the Designated Officer in the form of a letter.

2. Addressing Requests and Details

- To ensure prompt handling of requests, please address requests to the Designated Officer of Heritage.
- Requests will be acknowledged as official when made on the prescribed form.
- Applicants must provide sufficient information to enable the Designated Officer to identify the document(s) being requested. If insufficient information is provided, clarification will be sought from the applicant.
- Should the applicant be uncertain as to how to write his/her request or what details to include therein, communication with the Designated Officer is recommended.
- Applicants should note that requests for access to information that is readily available to the public, either from this public authority or from another public authority would not be processed however correspondence indicating same would be issued.
- Applicants should also note that in order to derive the rights given to the applicant under the FOIA, the applicant must make such requests for information in writing.

3. Time allowed

- Applicants will be notified within thirty (30) calendar days or before whether or not the request is approved.
- Applicants whose requests are incomplete or unclear will be informed of same by the Designated Officer who will make arrangements to consult with the applicant, with a view to clarifying the request.
- The time limit of thirty (30) days will be suspended while consultation with the applicant is being undertaken and will resume on the day the applicant confirms or alters the request.
- An applicant whose request for documents is refused will be notified by the Designated Officer in writing of the reasons for refusal. The Designated Officer will inform the applicant of alternative recourses that are open to him/her.
- If it appears that processing the applicant's request may take longer than the statutory limit, Heritage will acknowledge receipt and advise the applicant of its status, inclusive of such delay.
- The Applicant during the thirty (30) day period may call or write the Designated Officer to confirm receipt of the request and to ascertain its status.

4. Fees and Charges

- Section 17(1) of the FOIA stipulates that no fee shall be charged by a public authority for the making of a request for access to an official document. However, where access to an official document is to be given in the form of printed copies, or copies in some form such as a tape, disk, film or other material, the applicant shall pay the prescribed fee incurred for duplication of the said material.
- Details of charges for duplication of documents will be determined based upon individual requests by applicants.

SECTION 7(1) (a) (vi)

Officer in Heritage responsible for the initial receipt of and action upon notices under Section 10; requests for access to documents under Section 13; and application for correction of personal information under Section 36 of the FOIA:

The Designated Officer is:

Mr. McCaster Julien

Senior Legal Counsel
Heritage Petroleum Company Limited
Administration Building
S.S. Erin Road, Santa Flora
Phone: 649-6751 ext. 6104
Email: foia@heritage-tt.com

Alternate Designated Officer:

Ms. Anika Sarah Farmer

Legal Counsel
Heritage Petroleum Company Limited
Administration Building
S.S. Erin Road, Santa Flora
Phone: 649-6751 ext. 6104
Email: foia@heritage-tt.com

SECTION 7(1) (a) (vii)

Advisory boards, councils, committees and other bodies (where meetings/minutes are open to the public):

Currently, there are no bodies that fall within the limits of this Section of the FOIA.

SECTION 7(1) (a) (viii)

Reading room facilities:

Information in the public domain can be accessed through our website at www.heritage.co.tt. General information enquiries can be made to the Corporate Communications Manager, 649-6751 Ext. 6699. Heritage will provide a room and suitable space for members of the public who have been granted access to inspect specific documents. Such space would be accessible during the hours of 8:00am to 4:00pm from Monday to Thursday and is located at Administration Building, S.S. Erin Road, Santa Flora. All members of the public will be required to adhere to all rules and regulations outlined for the use of this facility.

SECTION 8 STATEMENTS

The following in-house documents can be made available for inspection upon request at this time:

- Recruitment and Selection Policy.
- Schedule of Financial Authorities.
- Credit Card Policy & Procedure.
- Overseas Travel Policy.
- Investment Policy.
- Internal Audit Code of Conduct.
- Internal Audit Charter.
- Internal Audit Confidentiality Statement.
- Internal Control Policy.
- Enterprise Risk Management Policy
- Insurance Claim Policy.
- Cash Conversion Policy.
- Dividend Policy.
- Unsolicited Proposals Procedure.
- Performance Management Policy.
- Leave Policy.
- Overtime/Call Duty/Call Out/Call Back Policy.
- Vacation Leave Accrual Policy.
- Mobile Device Usage Policy.
- Wireless Communications Policy.
- Third Party Software Policy.
- Internet Access Policy.
- End User Device Policy.
- Supply Chain Management Policy.
- Conflict of Interest Policy.
- Gift and Entertainment Policy.
- Heritage Control of Work Procedure
- Vehicle Fleet Policy
- Safe Driving Policy and Procedure
- Risk Management Standard
- Process Safety Fundamental Guideline
- Pre-Start-up Safety Review
- PPE Procedure
- Management of Change
- HSSE Contractor Requirements
- HSSE Committee Procedure
- Contractor HSSE Management Procedure
- CCMER Philosophy
- Behaviour-Based Safety Programme
- Hazard and Operability Study
- Drug Alcohol and Substance Abuse
- Scaffolding Management
- HSSE Minimum Training Procedure for Heritage and Contractors
- Pregnant and Nursing Mothers Policy

- ss. HSE Roles and Responsibilities Procedure
- tt. Process Safety Manual
- uu. Fatigue Management Procedure
- vv. Fit for Work Procedure
- ww. Safety Moment Guidance
- xx. Incident Investigation and Management Procedure
- yy. Benzene Management Procedure
- zz. Journey Management Procedure
- aaa. Safe Transportation of Cargo
- bbb. In Vehicle Monitoring System Procedure
- ccc. SIMOPS
- ddd. Medivac/Medi Move
- eee. Refusal to Work
- fff. No Smoking Policy
- ggg. HSSE OMS Manual
- hhh. HSSE Audit Management Procedure (EMS)
- iii. HSSE Document Control Procedure
- jjj. Chemical Management Procedure
- kkk. Indoor Air Quality Procedure
- lll. Waste Management Procedure
- mmm. Office Ergonomics Procedure
- nnn. Manual Handling Procedure
- ooo. Hearing Conservation Procedure
- ppp. Environmental Impacts Assessment (EIA) & CEC Application Procedure
- qqq. Management of Environmental Noise Procedure
- rrr. Management of Biodiversity and Ecological Conservation Procedure
- sss. Management of Soil and Groundwater Protection Procedure
- ttt. HSSE Goals Targets and KPIs Procedure
- uuu. HSSE OMS Management Review Procedure
- vvv. HSSE Training and Competency Procedure
- www. HSSE OMS Internal External Communication
- xxx. Stop Work Procedure
- yyy. Heritage Risk Management Policy
- zzz. Dangerous Animal Encounters Procedure
- aaaa. Process Safety Metrics Guide
- bbbb. Identification of Compliance Obligations
- cccc. Interested Parties Procedure
- dddd. Identification and evaluation of Environmental Aspects
- eeee. Gas Detection Equipment Management Procedure
- ffff. Succession Management Policy.
- gggg. Education Assistance Policy.
- hhhh. Training and Development Policy.
- iiii. Progressive Disciplinary Policy.
- jjjj. Promotion Policy.
- kkkk. Acting Policy.

SECTION 8(1) (a) (i)

Documents containing interpretations or particulars of written laws or schemes administered by the public authority, not being particulars contained in another written law.

“Not Applicable at this time”

SECTION 8(1) (a) (ii)

Manuals, rules of procedure, statements of policy, records of decisions, letters of advice to persons outside the public authority, or similar documents containing rules, policies, guidelines, practices or precedents.

“Save as mentioned at pages 3 and 4 above, not Applicable at this time”

SECTION 8(1) (b)

In enforcing written laws or schemes administered by the public authority where a member of the public might be directly affected by that enforcement, documents containing information on the procedures to be employed or the objectives to be pursued in the enforcement of the written laws or schemes.

“Not Applicable at this time”

SECTION 9 STATEMENTS

SECTION 9(1) (a)

A report or statement containing the advice or recommendations, of a body or entity established within Heritage.

Recommendations made by the Heritage Procurement, Disposal and Advisory Committee to the Chief Executive Officer

SECTION 9(1) (b)

A report or statement containing the advice or recommendations of a body or entity established outside of Heritage by or under written law, or by a Minister of Government or other public authority for the purpose of submitting reports, providing advice or making recommendations to Heritage or to the responsible Minister.

“At this time there are no reports or statements under this sub-section”

SECTION 9(1) (c)

A report or statement containing the advice or recommendations of an interdepartmental committee whose membership includes an officer of Heritage.

“At this time there are no reports or statements under this sub-section”

SECTION 9(1) (d)

A report, or statement, containing the advice or recommendations of a committee established within Heritage, to submit a report, provide advice or make recommendations to the responsible Minister or to another officer of Heritage who is not a member of the committee.

Minister of Finance Report on Contracts Awarded - produced by the Procurement Department

SECTION 9(1) (e)

A report (including a report concerning the results of studies, surveys or tests) prepared for Heritage by a scientific or technical expert, whether employed within Heritage or not, including a report expressing the opinion of such an expert on scientific or technical matters.

1. Environmental, Social and Governance Report 2020 - 2021
2. Environmental Survey of Soldado Fields
3. Prior and Post Ambient Air Quality Monitoring at Drilling Sites
4. Effluent monitoring for drilling pits.
5. Monthly effluent monitoring for three (3) Water Pollution Permits
6. Annual Report of Progress for three (3) Water Pollution Permits
7. Venting Emissions Survey
8. Annual Greenhouse Gas Emissions Report

SECTION 9(1) (f)

A report prepared for Heritage by a consultant who was paid for preparing the report.

1. Environmental, Social and Governance Report 2020 - 2021.
2. Environmental Survey of Soldado Fields
3. Prior and Post Ambient Air Quality Monitoring at Drilling Sites
4. Effluent monitoring for drilling pits.
5. Venting Emissions Survey
6. Annual Greenhouse Gas Emissions Report

SECTION 9(1) (g)

A report prepared within Heritage and containing the results of studies, surveys or tests carried out for the purpose of assessing or making recommendations on the feasibility of establishing a new or proposed Government policy, programmes or projects.

At this time there are no reports or statements under this sub-section

SECTION 9(1) (h)

A report on the performance or efficiency of Heritage, or of an office, division or branch of Heritage, whether the report is of a general nature or concerns a particular policy, programme or project administered by Heritage.

Consolidated Financial Statements of Heritage for the year ended 30 September 2022 and Unaudited Interim Condensed Consolidated Financial Statements of Heritage for the period ended 31 March 2023.

SECTION 9(1) (i)

A report containing final plans or proposals for the reorganization of the functions of Heritage; the establishment of a new policy, programme or project to be administered by Heritage; or the alteration of an existing policy programme or project administered by Heritage, whether or not the plans or proposals are subject to approval of an officer of Heritage, another public authority, the responsible Minister, or Cabinet.

“At this time there are no reports under this sub-section”

SECTION 9(1) (j)

A statement prepared within Heritage and containing policy directions for the drafting of legislation.

“At this time there are no statements under this sub-section”

SECTION 9(1) (k)

A report of a test carried out within Heritage on a product for the purpose of purchasing equipment.

“At this time we have no such reports”

SECTION 9(1) (l)

An environmental impact statement prepared within Heritage.

“At this time we have no such statements”

SECTION 9(1) (m)

A valuation report prepared for Heritage by a valuator, whether or not the valuator is an officer of Heritage.

“At this time there are no reports under this sub-section”

