

## **Health, Safety and Environment Policy**

At Kiwetinohk, we recognize the fortunes of all stakeholders are inseparable. We believe that, in the long term, for any stakeholder to benefit, all must be engaged and be encouraged to contribute. We acknowledge these stakeholders and that our responsibility to them includes health, safety and environmental discipline and excellence across all our operations and projects.

### **1.0 Purpose and Scope**

Kiwetinohk's Health, Safety and Environment Policy (HSE Policy) outlines the specific responsibilities, requirements, behaviours and expectations for all Kiwetinohk employees and contractors.

Compliance with this HSE Policy is mandatory for all employees and contractors.

### **2.0 Definitions**

"Kiwetinohk" or the "Corporation" means Kiwetinohk Energy Corp. and includes its subsidiaries and affiliates where the context requires.

"Prime Directive" means the level one policy document outlining Kiwetinohk's primary goal to build a better enterprise by stakeholder engagement and inclusion, serving and protecting its stakeholders and working together with them as society transitions to sustainable energy.

### **3.0 Principles and Rules**

#### **3.1 Accountability**

Kiwetinohk's core HSE principle is accountability, specifically the accountability of leadership to ensure employees and contractors under their direction:

- Comply with all laws
- Are trained and competent to manage their environment, health and safety responsibilities
- Are knowledgeable of the hazards and risks associated with their job, equipment and tasks
- Are provided with the standards, procedures, processes, tools and other resources necessary to conduct their work in a safe and environmentally responsible manner
- Identify solutions to safely execute their work
- Take appropriate actions to investigate accidents, near misses, and possible violations of HSE requirements set out in this HSE Policy and supporting standards

- Establish a culture of care wherein management and workers individually and collectively strive to build a safer and healthier workplace.

All employees and contractors are accountable for:

- Their own personal safety
- The safety of their co-workers, contractors, subcontractors and the public
- Understanding and exercising their obligation to:
  - refuse to perform, direct or witness without reporting, to a responsible person charged with oversight, work that is unsafe
  - identify and implement solutions to safely execute required work
- Compliance with relevant acts, orders, regulations, industry standards and company policies, standards and procedures
- Reporting to work and remaining fit for duty as required by Kiwetinohk's Fitness for Duty Policy

### 3.2 Systematic and in Control

Kiwetinohk believes all incidents are preventable and we are systematic and in control of all requirements of our Health, Safety and Environmental Management System (HSEMS).

We do this through:

- Knowledge and learning – we gather and understand facts, interpret our environment and apply knowledge to our activities. We seek to be a learning organization, learning from our performance and making necessary changes.
- Standards and procedural compliance – we capture knowledge in standards, processes and procedures, which we follow.
- Measure and evaluate – through proactive health and safety activities - safety audits and inspections, near miss reporting, training achievements, and health and safety culture.
- Questioning attitude – we always ask whether we understand the hazards and risks, what could go wrong and if we have the right processes, procedures and tools.
- Team backup – we support and look out for each other, intervening when something isn't right.
- Integrity – we do the right thing, the right way, every time.

### 3.3 Monitoring Performance, Continuous Improvement and Feedback

Kiwetinohk works to achieve or exceed performance levels required by legislation and industry standards and engages its employee, contractor, supply chain and other stakeholders

in our process of continuous improvement of performance related to health, safety and environmental protection related to Kiwetinohk's operations. This requires active engagement and progressive improvement in competency, systems and processes, and identification of solutions by people across the organization.

Kiwetinohk requires reporting of identified safety and environmental metrics and incidents so that organization can learn from incidents, monitor progress, intervene where necessary and report accurately to the Board of Directors and stakeholders.

People engaged by Kiwetinohk to conduct operations proactively identify safety and environmental protection risks, conduct regular inspections and audits, review and report performance and contribute to learning and training by reviewing and sharing incidents, industry experience and near misses.

Kiwetinohk's senior management regularly solicits active feedback and input from field operations staff, supervisors and contractors. Safety meetings are to be used to serve as a training tool and to help communicate targets and allow frontline personnel to provide direct feedback to management. Contractor Management Safety Excellence Meetings are held to establish measurable actions to improve worker safety. The Chief Sustainability Officer and the Chief Operating Officer(s) will direct the gathering analysis and reporting of operating statistics related to measuring and continuously improving health, safety and environmental performance.

Anonymous feedback can also be provided via Kiwetinohk's Whistleblower Policy. Whistleblowers can learn how to communicate with Kiwetinohk through instructions indicated in the "Contact Us" page on Kiwetinohk's website at [kiwetinohk.com](http://kiwetinohk.com).

### 3.4 Preparedness

Kiwetinohk responds promptly to incidents that involve the health and safety of our employees, contractors, the community impacted by our operations or the environment. Kiwetinohk responds to such incidents in a manner that prioritizes employee, contractor and public health and safety and environmental protection.

Kiwetinohk also has and maintains a Business Interruption Policy which also prescribes preparedness for unexpected events such as epidemics and natural disasters that affect the Kiwetinohk's assets or persons engaged in Kiwetinohk's business.

### 3.5 Consequences of Policy Violation

Any violation of this policy and supporting standards may result in discipline up to and including termination of employment or contractor engagement and/or disqualification from future engagement. In all situations, an investigation will be conducted to verify that a violation has occurred. The appropriate discipline depends on the nature of the policy or standards violation and the circumstances.

## **4.0 Other Matters**

### **4.1 Certification and Compliance**

All Kiwetinohk leaders, employees and contractors must understand and adhere to this HSE Policy.

New employees and contractors will be asked to certify their review of, and agreement to be bound by, this HSE Policy as a condition of employment or contract.

All employees and full time contractors will be asked to certify, annually, their review of and compliance with the provisions contained in this HSE Policy.

The Board of Directors monitors compliance with this HSE Policy through reports of management and requires that all people charged with oversight relative to this HSE Policy provide regular performance and compliance reports. Every effort will be made to resolve all situations of non-compliance.

### **4.2 Reporting Violations, Concerns or Questions**

Employees and contractors are obligated to promptly report any problems or concerns or any potential or actual violations of this HSE Policy or any of Kiwetinohk's policies.

The employee or contractor is required to do so to their Kiwetinohk supervisor or otherwise via the Whistleblower reporting process. Kiwetinohk's Whistleblower process and policy provides a means for the confidential, anonymous submission of complaints. The Corporation's Whistleblower Policy strictly prohibits reprisals or retaliation against anyone who raises a safety, environmental or ethical concern or complaint.

## **5.0. Related Policies and Mandates**

- Prime Directive
- Code of Conduct
- Whistleblower Policy
- Fitness for Duty Policy

## **6.0 Review, Modification and Exception**

Any employee can recommend a review or modification of, or exception to, this policy to the CEO on an as-needed basis. At minimum, the CEO will review this policy annually, making modifications as required.

Approved by Pat Carlson, CEO, on January 26, 2022.