



SENIOR MANAGEMENT COMMITMENT TO THE ENVIRONMENT, HEALTH & SAFETY

Senior Management at E.S. Fox Limited recognizes the importance of respecting all of its resources and assets, both human and material and our foremost concern is the safety and well-being of our employees.

In fulfilling this commitment, E.S. Fox Limited will provide and maintain a safe and healthy work environment for all employees and ensure compliance with legislative requirements and industry standards.

E.S. Fox Limited Senior Management and its employees equally share the responsibility for reducing accidents and absenteeism by performing their jobs in a safe and healthy manner as prescribed by the Health and Safety Policy of E.S. Fox Limited.

Injuries and costly property damage losses can be controlled through good management systems and practices, combined with active employee involvement, co-operation and continual improvement.

A handwritten signature in blue ink, which appears to read "E. Spencer Fox, III".

E. Spencer Fox, III, President

January 4, 2022
Date



OCCUPATIONAL HEALTH and SAFETY POLICY

Each individual is responsible for safety and has the duty to take immediate, appropriate, and effective action on any safety related matter. This is called the Internal Responsibility System which is an integral component in today's working world to help maintain the OH&S management system.

Everyone has the right to participate in the H&S Management System, the right to know and be informed about actual or potential dangers in the workplace, and the right to refuse unsafe work.

Accident prevention is an integral part of every job and the safety and well-being of each individual is deemed to be of paramount concern. Everyone has a personal responsibility to come to work fit for duty and to work safely.

Our Commitment

- ✓ We will comply with current applicable OH&S legislation and all other requirements which our organization subscribes to.
- ✓ We will establish, implement and maintain an effective OH&S management system which will be reviewed by senior levels of management on an annual basis.
- ✓ We will establish objectives, targets and programs to enhance our OH&S management system and review them regularly at management review meetings.
- ✓ We will establish the roles and responsibilities of all employees and ensure that they are being put into practice.
- ✓ We will communicate to all employees, visitors and subcontractors with the intent that employees are made aware of their individual OH&S obligations.
- ✓ We will review our policy and procedures periodically to ensure that it remains relevant and appropriate to the organization and that it remains current to changes in the OH&S legislation.
- ✓ We will document, implement and maintain all records and policies regarding the OH&S management system.
- ✓ We will commit to prevention of injury and ill health by eliminating hazards and reducing OHS risks.
- ✓ We will provide and maintain a safe and healthy working environment for our employees and partners to the best of our abilities.
- ✓ We will ensure that employees are fully competent to execute their duties and responsibilities through training, information and instructions given.
- ✓ We are committed to involving and consulting our employee's and worker representative(s) in the development of policies and procedures.
- ✓ We will make the policy available to all interested parties including the public.
- ✓ We will report health and safety events and initiate corrective and preventative actions.
- ✓ We will strive for continual improvement of our OH&S management system and our health and safety performance by setting goals and targets, monitoring our performance and acknowledging success.
- ✓ We will hold Managers, Supervisors, Workers and subcontractors accountable to their responsibilities under the OSHA and company policies to maintain a committed effort to protect the health and safety of all workplace parties.

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ENVIRONMENTAL POLICY

E.S. Fox Limited is committed to a clean, safe and healthy workplace and environment. All aspects of our business are managed in a safe and environmentally responsible manner in accordance with the principles set forth in this policy. We reaffirm our commitment through environmental stewardship and protect the well-being of our employees, customers and the public, both now and in the future.

PRINCIPLES

Engage Management, Employees and Subcontractors with appropriate communication and training to raise awareness of our shared environmental commitments. Each and every one of us has a role and responsibility in achieving these commitments and in protecting the environment.

We Shall Continually Promote Improvement of our environmental performance through our enhanced environmental management system and the diligent maintenance of our ISO 14001 certification.

We Forge Strong and Open Communication, information and dialogue with our employees, contractors, suppliers the public and community.

Prevent Pollution and Minimize our Environmental Impact that is appropriate to the nature, scale and environmental impacts for our best practices, processes and products. We will optimize the use of resources by reducing, reusing, and recycling energy, raw materials, utilities, by-products and using sustainable resources where possible.

We Will Comply, if not exceed all applicable environmental legislation, regulations, compliance obligations, and other mandated requirements set forth by the Federal, Provincial and Municipal Government.

We Shall Document, Implement and Maintain our enhanced Environmental Management System and our Environmental Policy continually to ensure total compliance.

We will set Environmental Objectives, Targets, Programs and monitor our performance and take corrective and preventative measures when required.

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WORKPLACE VIOLENCE & HARASSMENT POLICY

E.S. Fox Limited is committed to the prevention of workplace violence and harassment and is committed to maintaining a workplace where all workers are treated with dignity and respect. Violent behaviour in the workplace is unacceptable from anyone and there will be zero tolerance of any form of workplace violence or threatening behaviour.

E.S. Fox Limited recognizes that all workers have the right to work in a violence and harassment free workplace, and everyone is expected to work together and uphold this policy. This policy applies to all personnel and activities that occur while on E.S. Fox Limited premises or while engaged in work related activities or work related social events wherever they occur.

For the purpose of this policy, workplace violence includes, but is not limited to:

- The use of, or attempt to use, physical force by a person against an employee, in the workplace, that causes or could cause physical injury. For example: hitting, shoving, pushing, or kicking.
- Any threat, behaviour or action directed at an employee and interpreted to carry the potential to harm or endanger the safety of the employee. For example: Threatening language, shaking fists, destroying property or throwing objects.

Workplace Harassment is defined as:

- Engaging in a course of vexatious comment or conduct against a worker or customer in a workplace that is known or ought reasonably to be known to be unwelcome, or
- Workplace sexual harassment

Every worker must work in compliance with this policy and the supporting program. The program includes measures and procedures to protect workers from workplace violence & harassment, a means of obtaining immediate assistance and a process for workers to report incidents, or raise concerns.

Employees will not be retaliated against for reporting or participating in the investigation regarding incidents which, in good faith, they believe to be violations of this policy. E.S. Fox Limited will investigate and resolve reports of retaliation in the same manner as reporting of violence or harassment.

Management is committed to investigate and deal with all incidents and complaints of workplace violence and harassment in a fair and timely manner, respecting the privacy of all concerned as much as possible.

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