TEMBO NICKEL PROJECT
HEALTH AND SAFETY MANAGEMENT PLAN

TNCL-OHS-PLN-0007

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1. INTRODUCTION

1.1 Health and Safety Management Plan

The goals of Tembo Nickel Corporation Limited (TNCL) may be simply stated: “No harm to people, no accidents, and no damage to the environment. (Your Safety is My Safety). We are committed to a continuous improvement safety process wherein safety is a Core Value that must be incorporated into the day-to-day activities of all parties associated with the Tembo Nickel Project.

All personnel working with the TNCL Project will be required to comply with this Health and Safety Management Plan. The plan emphasizes the constant need to anticipate and plan work activities with safety as a priority.

All work shall be conducted to ensure that health, safety, and accident prevention form an integral part of the planning, construction, testing, commissioning, and operation of the TNCL Project.

The policies, objectives, and guidelines contained in this plan will apply to all phases of the project under the control or authority of TNCL. The TNCL and all contractors, sub-contractors, and suppliers engaged in this project will comply with or surpass the criteria stated herein.

2. POLICY AND OBJECTIVE

2.1 Health and Safety Policy Statement

Tembo Nickel Company Limited (TNCL) is committed to providing safe and healthy working conditions for the prevention of work-related injury and ill health and its appropriate purpose, size, and context of the organization and to the specific nature of its occupational health and safety risks. Tembo Nickel strives to operate in a safe workplace that is injury and fatality-free and to enhance the well-being of our employees and contractors. Tembo Nickel's's values are based on SAFETY, RESPECT, HONEST, and INTEGRITY.

To achieve this Tembo Nickel will:

a) Provide visible safety leadership, and appropriate leadership development and training at every level in the organization.

b) Identify all hazards and assess the risks, conduct an ongoing risk assessment for activities undertaken by the project, and set priority objectives for elimination and reduction of risk.

c) Establish and maintain an Occupational Health and Safety Management System that satisfies the requirements of ISO 45001:2018, all applicable statutory and regulatory requirements, industry best practices, and any other client-specific requirements.

d) Foster a positive health and safety culture conducive to the reporting of unsafe acts and conditions so that we may identify and address those conditions before injuries occur.

e) Ensure TNCL staff, Suppliers, Visitors, and other stakeholders have the opportunity to participate and consult in the occupational health and safety activities.

f) Empower our employees to demonstrate their commitment to safety daily through their actions and involvement in their work and the company safety programs and initiatives, and in strict adherence to rules, regulations, and procedures.

g) Promote awareness by communicating this policy to all internal and external interested parties to be aware of their obligations and responsibilities and encourage them to contribute to the TNCL health and safety program.

h) Ensure occupational health and safety performance objectives are set, monitored, reviewed, and measured results at regular intervals.

i) Report all incidents and accidents as required and thoroughly investigate and analyze them to prevent recurrences of similar causes.

j) Maintain continual improvement of Occupational Health and Safety Management and performance by regularly monitoring and reviewing the Occupational Health and Safety Management System to ensure its effectiveness.

In implementing this Policy, we will engage with and support our employees, contractors, suppliers, visitors, business partners, and local communities in sharing responsibility for meeting our requirements and upholding our Tembo Nickel values.

2.2 Program Objectives

This Health and Safety Management Program has been developed to coordinate the means to eliminate or control hazards and risks associated with the planning, construction, testing, and operation of the TNCL project.

In keeping with Tembo Nickel's Health and Safety Policy, the following are the established project health and safety objectives to which all project employees will subscribe and strive to achieve:

a) Maintain a safe and healthy work environment;
b) Work each day injury and incident-free;
c) Comply with legal and other requirements;
d) Work toward eliminating all injuries, occupational diseases, and incidents through a process of continual improvement;
e) Identify potential and existing hazards and take the actions necessary to eliminate and control risks;
f) Encourage the workforce to take ownership of the project's commitment to safety through leadership, positive reinforcement, and praise;
g) Provide a work environment that eliminates unsafe work practices through effective job planning and worker education and training;
h) Protect workers, visitors, community around, and other interested parties from hazards associated with the project; and
i) Promote safety as a constant value throughout the design, planning, construction, testing, and commissioning phases of the project.

2.3 Program Purpose

This TNCL Health and Safety Management Plan addresses the policies, protocols, and procedures that will be followed to ensure that employee health and safety is protected throughout the design, resettlement, construction, commissioning, and operation of the Tembo Nickel Project.

The purpose of the Tembo Nickel Health and Safety Management Plan is to:

a) Provide guidance and instruction on activities that must be carried out to achieve the health and safety-related objectives of the project;
b) Ensure compliance with the regulatory and statutory requirements, codes of practice, and industry standards;
c) Establish the health and safety policies that must be followed by all project employees;
d) Assign responsibility and accountability for health and safety activities on the project;
e) Describe the requirements relating to hazard analysis and development of Safe Work Practices for all work associated with the project;
f) Provide guidance to assist in the development and implementation of individual employee health and safety performance;
g) Enable TNCL employees, direct-hire consultants, subcontractors, workers, visitors, and the general public to be exposed to a healthy and safe work environment.

2.4 Plan Scope

The Tembo Nickel Project Health and Safety Management Plan summarizes the health and safety procedures that will be implemented on the Tembo Nickel Project. The contents of this document are not inclusive of all national and international OHS regulations, therefore, all employees shall be familiar with these and any other statutory requirements not specifically referenced herein.

This Health and Safety Management Plan does not replace an employer's responsibilities to ensure Health and Safety Plans are in place to protect workers from potentially hazardous conditions or unsafe work practices.

It is recognized that additional policies, plans, safe work procedures, and documentation will be developed and implemented to support the health and safety, training, security, and emergency preparedness and response initiatives required to ensure the safety of all participants on the Tembo Nickel Project.

3. RESPONSIBILITIES

3.1 General

The effective implementation and monitoring of the Tembo Nickel Health and Safety Management Plan is the cornerstone of the Tembo Nickel Project's Safety Program. TNCL's approach to safety on this project is based on several beliefs including, safety is an integrated function of line management, TNCL as "the owner," will ensure that the health and safety activities on the project are coordinated.

This safety coordination responsibility covers all employees undertaking work on the Tembo Nickel Project. It also recognizes that employees have a responsibility for the health and safety of themselves and others who may work around them and for ensuring that hazards relating to their work are eliminated or controlled to prevent injuries.

The TNCL's OHS department assists the management team in achieving a high degree of health and safety by providing policies, procedures, safety coordination, advice, and assistance to project personnel.

The success of this Health and Safety Management Plan is dependent on the contribution towards safety awareness from every individual employee on the project.

Every individual in a supervisory position is responsible for ensuring that all personnel working under their direction and control receive adequate training and instruction to safely perform their work.

Full cooperation of all personnel working on the project is necessary and expected.

3.2 Health and Safety Management

3.2.1 General

An effective Health and Safety program is dependent upon well-defined responsibility descriptions and clear communication links. The program for the Tembo Nickel Project includes the following activities.

3.2.2 Contractor Management

Management of the health and safety of contractors is detailed in the Health and Safety Contractor procedures. The activities shown on the flowchart identify action items and the corresponding deliverables that make up key components of the program.

TNCL manages contractor health and safety through oversight of its contractors' Health and Safety Management Plan activities. All contractors will develop their own Health and Safety Management Plan complying with the requirements of this plan. Weekly and monthly reports are generated by each contractor.

3.2.3 Accident Prevention

The primary guidelines to be used in determining the focus of safety activities on the project will be the Hazard and Risks Analysis, wherein each identified and distinct work activity will be given a risk ranking from high to low, based upon the combined considerations of:

a) the risk potential of the activity itself,
b) the anticipated frequency of the activity in the Work Program, and
c) the exposure to the workforce

TNCL provides similar support to direct-hire contractors through initial orientation training, safety audits, and attendance at selected safety meetings. TNCL support will be programmed based on the scope of the work and the risk ranking for the work of each individual contractor.

Daily, each TNCL supervisor will identify the potential risk activities with their site staff, and reinforce the safety measure for that day.

3.2.4 Reporting of Incidents

Incidence reporting is to be done in a two-step process, in accordance with the communication links as shown on the Incident Notification Form (Appendix 2):

Step 1: Immediate report to the line supervisor at the time of the incident, and inform the TNCL OHS Department.

Step 2: Within 24 hours of the incident, completion of an Incident Report Form (refer to Appendix 3 for further reporting).
This is to ensure that all serious incidences are reported immediately to upper management and to the project communications team.

3.2.5 Join OHS Committee

Joint Occupational Health and Safety Committees for TNCL will be the medium for employees and management to communicate and exchange information on health and safety matters. Membership will consist of selected management and worker representatives who are directly involved in site operations.

The Committee's purpose will be to assist in creating and maintaining a safe place of work. This will be accomplished through recommendations for improving safety procedures. As such, the committees will act primarily in an advisory capacity with the ability to make recommendations to management. Management will be required to respond to written recommendations if the Committees request a response.

3.2.6 Health and Safety Audits

A program of scheduled Health and Safety Audits will be established. Generally, for contractors, the guidelines for the program of audits will be as follows:

a) Formal audit of all Health and Safety matters – twice annually
b) Informal, unscheduled audits of selected matters of concern – as needed

Depending upon the complexity and duration of work programs for third-party contractors, appropriate audit programs will be initiated.

A schedule for safety audits by independent auditors may be implemented for the contractor(s) as required.

3.3 TNCL Responsibilities

3.3.1 General

TNCL will establish and issue basic policies, procedures, and standards that will govern the activities and limitations of the various project participants, including TNCL employees, direct–hire consultants, contractors, and subcontractors working on the project.

Specific responsibilities of TNCL personnel are directly proportional to their operational authority. The ultimate responsibility for establishing and maintaining an effective Health and Safety program for project participants rests with TNCL's senior management.

Each individual who works for, or has a consulting agreement with TNCL has a responsibility to actively assist in creating a safe work environment.

All TNCL management personnel have a responsibility for integrating health and safety procedures and controls into every activity they manage. All managers are directly accountable for the provision and maintenance of an effective health and safety program and must be seen to be promoting and leading the program.

For effective and efficient procedures to be utilized, TNCL management personnel shall consider using the following factors:

a) Pre-planning of events,
b) Scheduling of personnel;
c) Selection and training of contractors and subcontractors;
d) Handling, storing, and controlling materials;
e) Supervision and auditing of operations;
f) Inspecting work activities and equipment;
g) Establishing preventative maintenance programs;
h) Assessing all risks through Phase Hazard Assessments;
i) Establishing and making known safe work procedures;
j) Knowing and complying with applicable regulatory legislation and TNCL Standards;
k) Interpreting policies, procedures, and best work practices and ensuring workers are informed.

Senior TNCL management representatives are responsible for ensuring that a safe and healthy work environment is maintained within their jurisdictions and for monitoring and exercising control for health and safety initiatives within their assigned areas.

3.3.2 TNCL General Manager

It is the responsibility of the General Manager to ensure that an effective Health and Safety program is established and maintained in accordance with regulatory and corporate standards by undertaking the following:

a) Taking a proactive approach to occupational health and safety, security, and emergency preparedness and providing visible management support in the implementation and monitoring of these programs.
b) Providing the leadership necessary for the overall planning, implementation, and execution of the project's Health and Safety Management Plan within their area of responsibility.

c) Ensuring that clear direction has been provided to project representatives in their health and safety responsibilities and holding them accountable for meeting these responsibilities.
d) Allocating the resources necessary so that sufficient equipment, materials, and staff are in place to meet the objectives of the Health and Safety Management Plan.
e) Participating in management reviews of the project's Health and Safety Management Plan and programs for ongoing suitability, adequacy, and effectiveness and recommending measures to bring about improvement.
f) Periodically reviewing and monitoring the project's health and safety, security, and emergency preparedness programs through audits, submissions, and regular reports, recommending measures to bring about improvement and ensuring that deficiencies are identified and addressed as necessary.
g) Mandating the focus of all health and safety policies, objectives, and targets for the project.
h) The General Manager has overall budgetary control and authority for all aspects of the project.
i) Ensure project contractors are contractually bound to implement adequate Health and Safety programs.
j) Ensure appropriate health and safety requirements are implemented in all subcontracts.

3.3.3 TNCL Project Manager

The TNCL, Project Manager's health and safety responsibilities include:

a) Provides direction to the management, supervisors, safety representatives, and contractors in the application of the provisions of TNCL's Health and Safety Management Plan.
b) Reviews and monitors performance and holds the various levels of management/supervisors responsible and accountable for all aspects of the project's Health and Safety Management Plan.
c) Monitors and reviews TNCL and contractor's safety performance, identifying deficiencies and recommending measures to bring about improvement.
d) Ensures an effective process is in place whereby the project's health and safety policies and procedures are communicated and applied across the project organization.
e) Ensures the allocation of resources necessary to provide continuity for the objectives of the health and safety program.
f) Ensures that Phase Hazard Assessments are routinely completed for all scheduled project activity.

g) Ensures that all personnel conduct job hazard analysis before the commencement of any work activities.
h) Ensures that safe work plans are reviewed with all project personnel before the commencement of work activities.
i) Ensures that only trained and certified workers operate equipment and machinery.

3.3.4 TNCL OHS Manager

The TNCL's Health and Safety program is planned, developed, and administered by the OHS Manager, who has the authority to implement it and is accountable for doing so.

The OHS Manager has the following duties:

a) Develops issues and updates the Project Health and Safety Management Plan and its programs.
b) Ensures that accident prevention policies, procedures, and programs are established in consultation with all levels of management and employees.
c) Develops planning strategies and administers the Project OHS's department and identifies the resources required to effectively support the TNCL Health and Safety Management Plan and its programs.
d) Ensures that adequate levels of safety personnel are engaged to support the program
e) Develops implements and monitors programs in health and safety, security, and emergency preparedness.
f) Acts as a technical advisor in health, safety, orientation and training, security, and emergency preparedness issues for TNCL
g) Develops and implements a program to ensure that the various contractor's and subcontractor's health and safety, security, emergency preparedness programs, and safe work practices and procedures are reviewed and monitored on an ongoing basis to ensure compliance with regulatory requirements.

h) Ensures that a system is in place to advise contractors of deficiencies in their health and safety, security, and emergency preparedness programs or the programs of their subcontractors.
i) Ensures that an inspection program has been implemented for all project workplaces, structures, equipment, and work practices at appropriate intervals that will assist in preventing the development of unsafe conditions or practices.
j) Liaises with emergency response personnel, and other regulatory agency representatives assigned to the project.

k) Keeps senior management current as to the safety performance of various contractors.

l) Provides senior management with regular reports summarizing the status of the project health and safety, security, and emergency preparedness initiatives identifies problem areas or activities, and recommends measures to address deficiencies.

3.3.5 TNCL Health and Safety Leads

The TNCL Health and safety Leads have the following duties:

a) Acts as a technical advisor in health, safety, security, and emergency preparedness issues for TNCL.

b) Assists in the development and implementation of programs in health and safety, security, and emergency preparedness.

c) Reviews, monitors, and audits the various contractors' and subcontractor's health and safety, security, emergency preparedness programs, and safe work practices and procedures on an ongoing basis to ensure compliance with project and regulatory requirements.

d) Advise contractors of deficiencies in their health and safety, security, and emergency preparedness programs or the programs of their subcontractors and monitor compliance.

e) Develops and undertakes safety orientation and training sessions and maintains records.

f) Reviews work activities of all direct-hire and joint venture contractors.

g) Ensures that direct-hire contractor's general and task-specific safety orientation and training programs have been developed and made available for all project personnel and records are being maintained.

h) Assists and ensures that direct-hire contractors evaluate work activities, undertake job safety analysis, and implement safe work practices before starting work.

i) Ensures that contractors have an effective health and safety inspection program in place for all project workplaces, structures, equipment, and work practices at appropriate intervals that will assist in preventing the development of unsafe conditions or practices.

j) Ensures that adequate inspection records are being maintained. Identifies any areas in which the general public may be at risk, advises contractors, and tracks hazard control.

k) Monitors the direct-hire contractor's and joint venture contractors' health and safety activities to assist in ensuring that Daily Pre-Task Meetings, Weekly Tool-Box Meetings,

and Joint Health and Safety Committee Meetings are functioning effectively and that accident investigations are undertaken on a timely basis.

l) Gathers information and statistics and provides regular reports summarizing the Project's health and safety, security, and emergency preparedness initiatives.

m) Has the authority to shut down worksites where improper or a lack of worker protection exists.

3.3.6 TNCL, Supervisory Personnel

Prevention of accidents largely depends upon a supervisor's ability to effectively supervise workers, communicate and enforce safety requirements, and instruct personnel to work safely and productively.

Tembo Nickel project personnel with supervisory authority have the following health and safety responsibilities:

a) Be knowledgeable of all regulatory and project health and safety requirements pertaining to the work being conducted and ensure that supervised workers are made aware of all known or foreseeable hazards in the area where they work.

b) Ensure all personnel for whom they are responsible receive adequate orientation, instruction, and training in the safe performance of their work and demonstrate that they safely conduct their assigned tasks.

c) Ensure personnel have demonstrated competency in the knowledge of the training provided.

d) Ensure that general safety rules and supplementary and/or site-specific instructions are provided to all personnel under their direction and that these workers have received and understand the instructions provided.

e) Ensure that work activities have been reviewed before starting work and ensuring that a Job Hazard Analysis has been conducted for tasks and corresponding Safe Work Procedures have been developed and communicated to workers.

f) Ensure health and safety inspections are being conducted regularly of all facilities and work activities for which the supervisor is responsible.

g) Take prompt action to identify unsafe conditions or work practices and report hazards.

h) Ensure that corrective action is undertaken without delay.

i) Ensure that appropriate first aid or medical aid is provided for all workplace injuries.

j) Ensure all accidents and incidents are reported, and investigated, and corrective action is implemented.

k) Ensure protective/control measures identified in the Phase Hazard Assessments have been implemented before the commencement of work activities.

3.3.7 TNCL Employees

All Tembo Nickel Project personnel must realize that undertaking a task safely is as much a part of job performance as technical knowledge. Project health and safety requirements and safe work practices and procedures are for the protection of the worker and must be followed.

Employees have the following responsibilities:

a) Be knowledgeable of and comply with the requirements of the project Health & Safety policies, programs, safe work practices, and other regulatory requirements.

b) Report all unsafe practices and conditions to their supervisors. Where the worker is unfamiliar with the task being undertaken, they must advise their supervisor to review the necessary health and safety requirements required to undertake the tasks safely.

c) Take corrective actions, when authorized, to eliminate or control potential hazards.

d) Not operate machinery or equipment unless they are authorized and trained and all safeguards are in place.

e) Refuse to do work that would create a danger to the health or safety of themselves or other employees.

f) Report immediately all work-related injuries and health problems to their supervisor and the first aid attendant. For all work-related injuries or health problems requiring off-site medical aid (treatment by a physician), the affected employee is to report the treatment to their supervisor as soon as possible.

g) Do not engage in horseplay, fighting, workplace violence, practical jokes, or similar conduct that may endanger them or others.

h) Maintain good housekeeping in their work area.

i) Wear and maintain personal protective equipment where required by project policy or statutory requirements.

j) Attend and actively participate in the health and safety meeting activities as required.

k) Conduct Level Risk Assessment, Job Hazard Analysis, and Pre-Task Instructions before commencing any work activities.

If an employee is in doubt about performing a task safely and properly, the employee must ask their supervisor or Safety officers/personnel for directions to complete the task safely.

Employees may be subject to disciplinary action if they are under the influence of alcohol, illegal drugs, or any other substance that could adversely affect the performance of their work.

4. ORIENTATION AND TRAINING

4.1 Introduction

TNCL recognizes that the orientation and training of workers is a vital part of an effective health and safety management system.

Special emphasis shall be placed on ensuring that individuals have been given adequate direction, training, and instruction in the safe performance of their work in their area of assignment and that it is performed without undue risk.

Health and safety education and training assist workers understand:

a) What is expected of them concerning health and safety;
b) How to perform and execute their tasks safely and efficiently;
c) What order to carry out the steps of the job assigned to them?

4.2 General

Tembo Nickel has specific responsibilities concerning the safety orientation and training of their employees. These responsibilities include:

a) Be knowledgeable of the contents of the TNCL Health and Safety Management Plan;

b) Ensure that required instruction and training is provided to workers in all aspects of the worker's assigned activities;
c) Ensure a monitoring program is in place to ensure that workers understand and are following safe work practices; and,
d) Ensure that up-to-date orientation and training records are being maintained.

4.2.1 TNCL Supervisors

Supervisors are vital links in the implementation and overall success of the health and safety management system. They are responsible for the day-to-day operation of the system.

Supervisory personnel, who have individuals under their direction and control, shall:

a) Ensure these individuals receive all the necessary Safety Orientation and Training before they are assigned to a job site;
   - Identify training requirements
   - Carryout training
   - Evaluate the effectiveness of training
   - Carry out risk evaluation of work activities
   - Ensure appropriate personal protective equipment is worn

b) Ensure that Daily Pre-Task Planning Meetings are held to review the upcoming tasks planned for that day and that Safe Work Procedures are developed and reviewed;

c) Ensure Task-Specific Safety Training is provided to employees before these individuals are assigned to specific tasks that require additional training, (i.e. Confined Space Entry Procedures, Fall Protection);

d) Monitor employees under their direction and control to ensure that the health and safety instruction is understood and being followed;

e) Ensure that all new or transferred employees have the required training.

4.2.2 TNCL Employees

Employees shall be adequately trained for all aspects of their work.

a) All personnel are required to attend all orientation and training sessions and shall follow all instructions provided in these sessions.

b) Employees have a responsibility to advise their supervisor when they identify a need for additional safety instruction or training.

c) Employees are responsible for seeking assistance from their supervisor if they are unsure of the safety or any other aspect of the job they are performing.

4.3 General Safety Orientation

All TNCL personnel shall not access the project site unaccompanied until they have attended the appropriate Safety Orientation Training. Personnel who have not attended the Safety Orientation Training shall be accompanied at all times.

A means shall be developed to indicate that attendees have received the necessary training as it relates to a specific site/task.

4.4 Site/Task-Specific Safety Orientation

In addition to the General Safety Orientation, personnel who may be required to carry out their work assignments in areas that may require additional training due to the risks associated with work location will be required to participate in a site/task-specific safety orientation.

It is recognized that more detailed task-specific training sessions will be required for workers exposed to higher-risk construction activities or personnel whose work location exposes them to additional risks, (i.e. Fall Protection, Confined Space Entry, Lock-Out Procedures, etc.).

4.5 Follow-up Supervisor Monitoring and Training

When an employee has received safety education or training, the supervisor shall be responsible for monitoring that employee to ensure that the employee has understood and is following the instructions provided. Higher-risk activities shall be monitored more closely than lower-risk activities.

4.6 Joint Health and Safety Committee Training

Training will be provided for those employees who participate in specific Joint Health and Safety Committee activities, for example:

a) Joint Health and Safety Committee members
b) Those employees who conduct Health and Safety Committee Workplace Inspections and Accident Investigations

4.7 Training Records

It is the responsibility of Tembo Nickel when providing the instruction or training to ensure accurate records are maintained. These records shall indicate the following

a) Course Title (i.e. General Safety Orientation, Emergency Response, etc.)
b) Date
c) Attendee's Name
d) Employer
e) Instructor Name/Company
f) Location for which the Training applies (i.e. Site Safety Orientation, etc.)

4.8 Training Records Retention / Turn-over

Copies of all Training Records are to be retained for the duration of the project by Tembo Nickel.

4.9 Typical Safety Orientation Checklist

TEMBO NICKEL	STANDARD OPERATING PROCEDURE	Document No:	TNCL-OHS-FRM-0014
		Document owner	OHS Manager
	GENERAL INDUCTION ATTENDANCE REGISTER	Revision	01
		Approve Date	13th March 2023

I confirm that the participants have been shown, informed, or introduced to (tick appropriate boxes):

☐ Intro, site overview	☐ Medial health	☐ Radiation, & Compressed air
☐ People's culture & awareness	☐ Lockout & Tagging	☐ Housekeeping
☐ Duty of care	☐ Fire Safety	☐ Vehicle & equipment safety
☐ Legislation and regulations	☐ Electrical Safety	☐ Fitness for work, drugs, alcohol
☐ Health and Safety Policy	☐ Signs, Tapes, and Barricades	☐ Explosives, noise, smoking
☐ Zero harm Workplace	☐ Lightning Safety	☐ Chemical safety & manual handling
☐ Emergency & Preparedness	☐ Working at height	☐ Behaviors, PPE compliance
☐ Fire prevention	☐ Permit to work.	☐ CR, HR & Code of conduct
☐ Incident/ accident reporting	☐ Rotating Equipment	☐ Environmental induction
☐ First aid, Injury Management	☐ Confined Space	☐ Security

5. SAFETY MEETINGS

5.1 General

TNCL recognizes the need for, and benefits of, various types of Health and Safety Meetings on the Tembo Nickel Project. The purpose of these safety meetings is to assist in promoting compliance with the Project's Health and Safety Management Plan and all applicable regulatory requirements, creating a safe place for workers, the general public, and visitors to the project, and recommend actions that will improve the effectiveness of the health and safety program.

The various categories of Health and Safety Meetings on the Tembo Nickel Project include:

a) TNCL Health and Safety Meetings.
b) Pre-Construction Kick-Off Safety Meetings.
c) Daily Pre-Task Planning Meetings.
d) Weekly Tool Box Safety Meetings.
e) Monthly Safety Meetings.
f) Joint Health and Safety Committee Meetings.
g) Task-Specific Safety Meetings.

5.2 TNCL Health and Safety Meeting

Senior site management from Tembo Nickel will meet every month to review the Project Health and Safety programs. Tembo Nickel will provide an update on the significant health and safety activities that have been undertaken during the previous month.

Topics of discussion will include:

a) An update of the significant safety initiatives undertaken during the month.
b) An overview of site inspections of the project and the topics of discussion, Inspection Orders written, and Inspection Compliance Plans.
c) An overview of the various training sessions and safety meetings undertaken during the month.
d) An overview of any incidents occurring on the project during the month: (i.e. first aid, medical aids, lost time, property damage, environmental issues).
e) A review of the effectiveness of the Project Health and Safety Plan and its program and measures that will improve the performance of the health and safety program

5.3 Pre-construction Safety Meeting

When a contract is awarded and prior to the contractor/subcontractor starting work on-site, a Pre-Construction Kick-Off Safety Meeting shall be held. Senior site and senior safety representatives from the contractor (and subcontractor) shall be in attendance.

Topics discussed should include:

a) The contractor's (and subcontractor's) commitment to a safe and healthy work environment.
b) Malaria Management, HIV/AIDS Education.
c) Roles and responsibilities as they relate to health and safety.
d) Integration of the contractor's and subcontractor's Safety Program.

e) Safety Orientation and Training requirements.
f) Job Hazard Analysis for all tasks and the development of Safe Work Procedures.
g) Daily Pre-Task Meeting, Weekly Tool Box Safety Meeting, and Joint Safety Committee Meeting requirements.
h) Accident/Incident Reporting and Emergency Reporting and Response requirements,
i) Requirements for Workplace Inspections.
j) Personal Protective Equipment requirements.
k) First Aid and Security Requirements.
l) Protection of the General Public and Visitor requirements.
m) Submittals are required from the contractor and subcontractor(s).

5.4 Daily Pre-Task Planning Safety Meeting

Daily Pre-Task Planning Meetings shall be attended by supervisors and team members. Typically these meetings are conducted at the beginning of the shift by the supervisor, with the lead hand and crew in attendance.

The purpose of these meetings is to:

a) Identify tasks that may have an associated hazards to be performed during the shift;
b) Identify the potential hazards associated with the work;
c) Identify, reinforce, and record the SOP and other control measures in place;
d) Identify any other safety considerations, (additional training required, etc.).

5.5 Weekly Toolbox Safety Meeting

Weekly Tool Box Safety Meetings are another effective way for supervisory personnel to exhibit their own and the company's/contractors' commitment to the health and safety program. Tool Box Safety Meetings shall be conducted by all TNCL site managers every week.

These educational talks should be conducted with a specific topic for discussion, such as reviewing safe work procedures or discussing fall protection requirements. Management, Supervisors, Field Engineers, Lead hands, and all workers shall attend and minutes of these meetings are to be kept. In accordance with the provisions outlined in the Contractors Health and Safety Management Plan, subcontractors are expected to conduct weekly toolbox safety meetings with their workforces and subcontractors.

5.6 Monthly Contractor Safety Meeting

Contractor Safety Meetings shall be held by TNCL site management every month. The senior management representative (Project Manager, OHS Manager, H&S Leads) shall attend and lead the discussion. Talks should focus on promoting and reinforcing the commitment and vision of an incident-free workplace.

Management should discuss:

a) Taking the time to undertake work safely in the face of all other accountabilities;
b) Safety is not just a priority but a value and takes precedence over any other activity or consideration;
c) Integrate safety into all meetings as the first topic for discussion;
d) Safety is not delegated solely to the project safety representatives, but it takes demonstrated full-time commitment from the whole project team;
e) Workers are empowered to take action to prevent unsafe work conditions or practices;
f) All individuals are to take personal responsibility for their own safety and for the safety of those they are working with.
g) All individuals are encouraged to remove barriers and obstacles that prevent work from being undertaken safely.
h) The workforce should be recognized and praised for working safely. The safety record should be acknowledged.

5.7 Joint Health and Safety Committee Meetings

5.7.1 General

TNCL shall have a Joint Health and Safety Committee that will meet at least monthly. Committee membership shall include management, contractor safety representatives, and project employees. Representatives from various areas and disciplines are to be included. To be successful, the Safety Committee shall operate in an atmosphere of cooperation and trust. The committee is not a policy-making body and the normal divisions of authority should be respected. Recommendations and suggestions from the committee are expected and management will consider and respond to the committee's recommendations without delay.

The primary source of topics for discussion for these meetings shall be the findings of the inspection tours. It is recommended that an inspection team consisting of two Safety Committee members (one management representative and one employee representative) shall inspect the work areas at least a day or two prior to the meeting. A record shall be kept of the inspection

team's findings and they shall be reported to the committee. Through the minutes of each meeting, conspicuously posted and distributed to committee members, the committee can ensure that each concern is brought into view until a satisfactory solution has been found.

5.7.2 Committee Duties

The Joint Health and Safety Committee has a responsibility to:

a) Determine that regular safety inspections of the job site have been carried out.
b) Determine that accident/incident investigations have been carried out.
c) Determine that structures, equipment, machinery, tools, methods of operation, and work practices comply with regulatory requirements and site policy.
d) Solicit and consider employee input.
e) Recommend measures required to gain compliance with the project safety management program, site-specific Health and Safety policies, and correction of hazardous conditions or unsafe work practices.
f) Ensure adequate records relating to accidents, incidents, injuries, illnesses, investigations, inspections, and safety meetings are maintained.
g) Review all site-specific inspection reports concerning the health and safety of employees.
h) Record proceedings of meetings and post them in conspicuous locations and forward minutes to Tembo Nickel.

5.7.3 Election of Committee Members

The committee must elect a chairperson and a secretary from its members with management representing one position and an employee representing the other.

5.7.4 Typical ''Terms of Reference''

It is recommended that the Committee generate a "Terms of Reference." Committee members should consider including the following in the "Terms of Reference:"

a) Membership
b) Election of Committee Members
c) Objectives of the Committee
d) Role and Responsibility of the Chairperson and Secretary
e) Minutes and Recordkeeping
f) Distribution of the Minutes

5.7.5 Agenda

It is recommended that the meeting agenda should be standardized as follows:

a) Roll call (record members present and absent, and guests).
b) The revision (if necessary) and adoption of previous meeting minutes.
c) Discussion of old or unfinished business.
d) Review of recent accidents, investigations, and corrective actions.
e) Discussion of health and safety-related concerns and suggestions.
f) Reports on inspections, with recommendations.
g) Training and education of committee members.
h) Discussion of new business.
i) Schedule the next meeting.
j) Adjournment.

5.7.6 Conducting the Meeting

At the first meeting, members should elect a chairperson and a secretary and prepare and issue the committee's proposed "Terms of Reference". Members should prepare for the meeting by being ready to discuss what is on the agenda. Committee meetings should work by consensus to recommend solutions rather than deciding matters by majority vote.

Joint Health and Safety Committee Meetings generally proceed as follows:

a) An agenda item is presented;
b) A discussion follows to ensure all members understand the issue:
c) Members discuss solutions to find the best resolution; and,
d) The chairperson states the consensus of the committee and summarizes recommendations, decisions, and assignments. Where an action item is noted, the individual assigned to undertake the action and a recommended completion date should be identified.

5.8 Task Specific Meeting

When work is being performed and the nature of the work is rated as "high risk" as defined through the evaluation of a risk assessment or the work has the potential for significant safety or environmental impact, Tembo Nickel department managers and/or supervisors and contractor management/supervision must conduct a Task-Specific Safety Meeting.

The purpose of this meeting is to review the step-by-step procedures from start to finish of the task to control all potential hazards. This approach is proactive and questions asked should include “What could go wrong?” and “Where will the next injury incur?” Written Safe Work Procedures provide a ready reference to tasks that may not be carried out often, jobs that require uniformity, or tasks that may be hazardous.

The supervisor and all affected employees shall review the nature of the work, the sequence of the procedures, and the equipment used. Instruction should be arranged to ensure that all employees understand what to expect as the job progresses and how to deal with the hazards.

A copy of these meeting minutes (i.e. topics discussed, date, and attended by whom) shall be retained by Tembo Nickel and shall be available for review.

5.9 Safety Notice Boards

In order to raise safety awareness and maintain a highly visible safety profile, Tembo Nickel and its contractors shall establish and maintain Safety Notice Boards of a size suitable to accommodate Safety Notices, Minutes of Safety Meetings, Emergency Response Information, and any other pertinent information. Tembo Nickel shall be responsible for keeping all postings current.

6. RISK MANAGEMENT

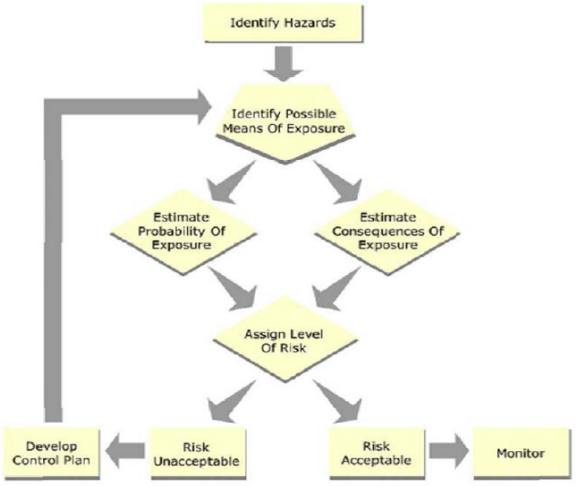
6.1 Risk Management

Managing risk is an integral component in attaining a safe and productive worksite. To mitigate the potential exposure to unknown hazards, all employees will undertake a regular risk assessment of work activities and routinely carry out Phase Hazards Assessment and Job Hazard Analysis in advance of projected work activities (Refer, TNCL-OHS-SOP-0032- Risk Assessment Procedure)

6.2 Risk Assessment

The following flow diagram outlines the risk assessment process

Figure 1: The Risk Assessment Process



The screening level risk assessment is a five-step process:

1. Identify hazards.
2. Identify possible means of exposure to the hazards.
3. Estimate consequences of exposure to the hazards.
4. Estimate the probability of exposure to the hazards.
5. Assign a level of risk.

6.2.1 Informal Task Analysis

All contractors are expected to educate their workforces to conduct informal risk assessments of individual tasks as part of regular work activities. This risk assessment involves a mental identification of a hazard, an estimation of what would happen if contact were made with the hazard, and the likelihood of contact occurring. From this informal mental exercise, a decision is made on a course of action to reduce the risk to an acceptable level. This informal process does not involve extensive research or paperwork.

6.2.3 Safe Work Plan

An SWP involves a more formal approach to risk assessment and applies to specific work activities where either a single unusual event is undertaken or a high degree of risk is present. The SWP breaks the event down into its tasks. The hazards, consequences, and probability of a hazardous occurrence are identified for each task. Reducing the hazard, consequences, probability of contact, or a combination of all three reduces unacceptable risks.

All SWPs must be reviewed with the assigned workforce before commencement of the work activities and all parties involved must sign off acceptance and adherence to the SWP. The Project Manager or designate and the site safety representative or designated individual qualified to evaluate the plan, must review the SWP. If approved, the plan is returned to the crew supervisor for implementation. If not approved, the plan is reviewed with the supervisor and revised as necessary. When an agreement is reached, the plan is approved and implemented. A SWP for a routine or repeated job needs to be developed only once unless a significant change in the workplace that could affect the risk level occurs. A copy of the SWP is to be kept on file in the Site Safety Office.

6.2.4 Risk Process

Identify risk

a) Identify threats and opportunities by considering them.
   - What can go wrong and what must go right
   - Five-year plan, the life of assert planning, and other deliverables from our requirements for corporate alignment planning.
   - Purpose statement from TNCL requirement for organization design
   - Internal and external sources of risk
   - Intended and unintended when introducing change

b) Prioritise for assessment and treatment of any risks that can impact the achievement of strategic and operational business objectives.

Assess risk

a) For each identifies risk
   - Classify risk as a current risk or an emergency risk.
   - Use one or more recommended techniques in the Risk Frame to perform a risk assessment.
   - Use the TNCL Severity and Likelihood table (Table 4) to determine the Maximum Foreseeable Loss (MFL) and for each risk or risk scenario with an MFL impact level to determine the Residual Risk Rating (RRR)
   - Determine maximum foreseeable gain (MFG) for an opportunity.
   - Review, and when applicable, update the risk assessment following any risk-relevant change

- Ensure people with relevant expertise and experience are involved in all risk assessments.

b) For each current risk, classify it as a current material risk if it has an MFL ≥ level 4 impact.

c) For each current material risk, identify critical controls, and for each critical control determine:

- the critical aspects of the design and operating performance criteria required to achieve the control's primary objective;
- the verification activities required to check that the critical control is operating effectively according to its design; and
- a manual test plan to test that the critical control is achieving its primary objective and effectively managing the risk.
-

Table 1: Severity and Likelihood

IMPACT	1 Insignificant	2 Minor	3 Moderate	4 Significant	5 Very significant
Financial impact on available cash	<$200,000	<$500,000	<$1,000,000	<$10,000,000	>$10,000,000
Strategy	No or insignificant impact of ability to achieve strategic objectives	Minor impact of ability to achieve strategic objectives	Moderate impact of ability to achieve strategic objectives	Significant impact of ability to achieve strategic objectives	Unable to meet one or more strategic objectives
Management time	No or insignificant diversion of senior management time	Some senior management time required to minimise impact	Significant senior management time required to minimise impact	Significant diversion of senior management time required to minimise impact with some involvement of Lifezone ExCo and/or Lifezone Board	Complete diversion of senior management time for a prolonged period and significant involvement of Lifezone ExCo and/or Lifezone Board
Reputation	Minor, temporary impact on company reputation, legal rights or compliance, or social value proposition	Measurable but limited impact on company reputation, legal rights or compliance, or social value proposition at a local level (region, city, town)	Substantial impact on company reputation, legal rights or compliance, social value proposition, or ability to access opportunities at a sub national level (state, territory, province)	Serious impact on company reputation, investment attractiveness, legal rights or compliance, social value proposition or ability to access opportunities at a national level	Severe impact on company reputation, investment attractiveness, legal rights or compliance, social value proposition or ability to access opportunities at a global level
OHS	Minor Injury	Medical Treated Injury	Lost Time Injury	Irreversible disability or impairment	One or more fatalities
Environmental Impact	Minor, temporary impact to the environment, where the ecosystem recovers with little intervention	Measurable but limited impact to the environment, where recovery of ecosystem function takes less than 1 year	Substantial impact to the environment, where recovery of ecosystem function takes between 1 and up to 3 years	Serious impact to the environment, where recovery of ecosystem function takes between 3 and up to 10 years	Severe impact to the environment and where recovery of ecosystem function takes 10 years or more
Community	Minor, temporary community impact that recovers with little intervention	Measurable but limited community impact lasting less than one month	Substantial impact on community lasting 2–6 months	Serious impact on community lasting 6–12 months or a substantiated human rights violation impacting 1–5 persons	Severe impact on community lasting more than 12 months or a substantiated human rights violation impacting 6 or more people

Treat risk

a) For each current risk (either materials risk or non-material risk) and each one of short-term materials risks.

- Implement preventive control to prevent the causes of a threat, and mitigating controls to reduce its impacts.
- implement controls to enable and/or enhance an opportunity; and
- if the RRR ≥ 90, stop the activity or get approval to continue the activity by completing a risk evaluation under the TNCL Critical Control and risk evaluation (Figure 00)

b) For each emerging risk, make sure contingency controls are in place when the RRR ≥ 90.

Table 2: Risk Evaluation

LIKELIHOOD	1	2	3	4	5
	Rare	Unlikely	Possible	Likely	Very likely
Probability of occurring at least once over the next three years	<10%	10 - 25%	25 - 50%	50 - 80%	>80%
Description	May occur only in exceptional circumstances	Could occur at some time	Might occur at some time	Will probably occur in most circumstances	Is expected to occur in most circumstances

Monitor and Review

a) For each current material, risk follows under the TNCL Critical Control and Risk Evaluation register to perform a critical control effectiveness test (CET) and risk evaluation at least annually.

b) For each emerging risk, TNCL will review the risk at least annually to confirm:
- the risk remains an emerging risk and has not become a current risk;
- the RRR remains accurate; and
- any required contingency controls remain in place.

c) TNCL will review the risk register for completeness and continued management of risks within requirements and get approval annually.

Communication

Each risk with MFL ≥ I Level 4 impact be recorded in the risk register

6.3 Field Level Risk Assessment

Field Level Risk Assessments (FLRA) are an important tool used by TNCN for the identification and correction of potential OHS Risks before the initiation of work each day. FLRA largely consists of checking a list of pre-identified potential hazards and established controls, to ensure that new or unusual hazards are not present and that defined controls are in place. The FLRA

must be done by each worker or team before the commencement of the work activities and all parties involved must sign off.

6.4 Hazard Identification

6.4.1 General

A key component in any successful health and safety management system is a process that encourages all workers, including supervisors and management to identify, assess, and control risks that have the potential to cause loss to people, property, materials, equipment, or the environment.

6.4.2 Hazard Identification

The identification of workplace hazards will be the responsibility of all TNCL Nickel employers, supervisors, employees, consultants, contractors, and subcontractors on the project. A “hazard” is defined as “any circumstance or condition which poses the risk of an incident.” A “hazard analysis” is “a thorough examination of an operation, (job site, task, etc.), for the purpose of identifying what actual and potential dangers exist”, e.g. overhead power lines, stored energy, etc. A written document will be completed to eliminate or control the risk(s) and assign responsibility. The work activity should not begin until a thorough job hazard analysis and control measures have been undertaken and reviewed by the crew.

It shall be the policy of Tembo Nickel, that a written Job Hazard Analysis for each operation will be conducted before undertaking that work activity. The identification of a work activity that requires a Job Hazard analysis may be made by:

a) Site inspections;
b) Reviewing existing or upcoming work and identifying potential activities that may present a risk;
c) Vehicle equipment and machinery inspections;
d) Analysis of specific job descriptions, and safe work procedures;
e) Observing specific job tasks;
f) Discussions with contractors, consultants, or workers;
g) Review of accidents or incidents.

Before approaching a task, project participants must recognize the inherent hazards, evaluate the potential risks, gain knowledge and information about the hazards, and control the amount of exposure to conduct the work safely. It is useful to assess the hazards associated with a task

by first considering the objectives of the work, and then listing the hazards and risks associated with those activities that may impact the safety or health of workers or the general public. Recognition involves identifying potential hazards and assessing the degree or significance of the hazards. Recognizing the types and degrees of the hazards present should be one of the first steps in conducting project-related fieldwork.

6.4.3 Job Safety Analysis

After the initial identification has been performed, a hazard analysis will be completed to identify the potential risks associated with undertaking the tasks. This information is required for the development of control programs.

The four basic steps in conducting a Job Hazard Analysis are:

a) Selecting the job to be analyzed;
b) Breaking the job down into a sequence of steps
c) Identifying the potential hazards; and,
d) Determining the preventative measures to be implemented to overcome these hazards and evaluating their effectiveness.

The information to perform the Job Hazard Analysis may include:

a) Physical state of the hazard,
b) Worker/equipment hazard interface,
c) Expected volume and maximum concentration of the substance,
d) Time duration and frequency of exposure,
e) Availability of engineering controls to detect and control worker exposure,
f) Viability and use of personal protective equipment,
g) Availability and use of site protection equipment, and,
h) Vehicle equipment and machinery inspections.

It is vital to evaluate the impact or risk a hazard poses to the health and safety of workers, the general public, or the potential for environmental impairment.

Select the work activity break it down into its sequential steps and maintain a written record. Continually ask yourself the question “What could potentially go wrong?” Emphasize hazards that have a high probability of occurrence and those that have a high loss potential, even if the probability of occurrence is low.

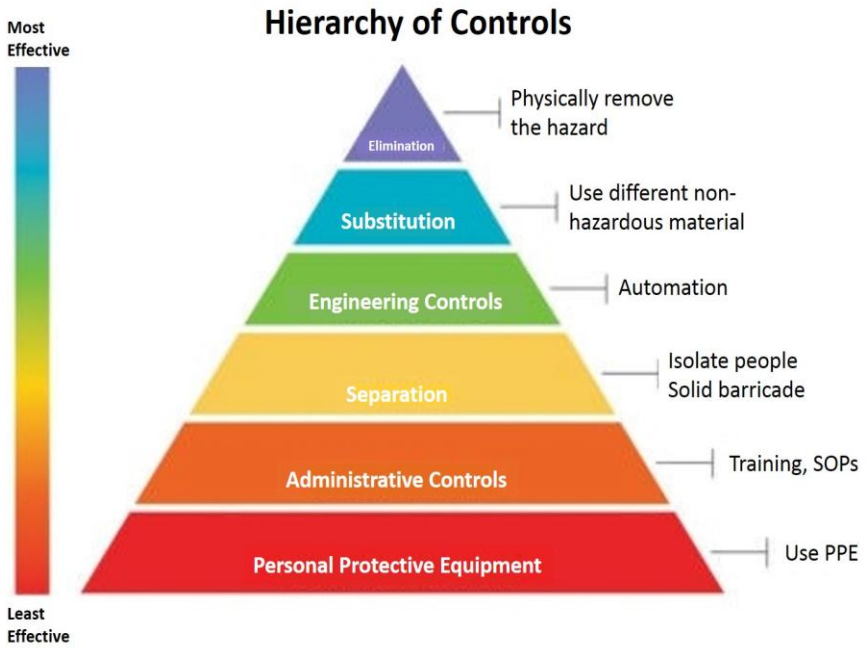
Risk is the measure of the probability of an incident happening combined with its severity. Risk must be assessed based on exposure (or potential exposure) to site personnel and/or the general public taking into consideration the use of engineered safeguards, the institution of safety procedures, and/or use of personal protective equipment. The presence of a hazard constitutes some risk, but if the hazard is under control through awareness and procedures, the risk may be low. If hazards are uncontrolled or unidentified, the risk they present is increased.

The hazard analysis must consider the people involved in the project or task (their inputs and involvement should be utilized whenever possible), the materials they will be working with the training the workers have received, the equipment/tools they will be using, and the environmental they will be working in or around.
There shall be a job Hazard Analysis performed for every significant work activity on the site.

6.4.4 Development of Hazard Control Programs.
Once a hazard has been identified and evaluated to determine the level of risk it presents, an action plan shall be implemented to eliminate or reduce the hazard to acceptable levels. The control of a hazard may be conducted in several ways depending on the type and magnitude of the hazard. The appropriate control measures must be developed and implemented to eliminate the hazards or reduce the severity.

Control measure is included but not limited to the following:

Figure 2: Control Measure



Eliminate – Consider eliminating the hazard by redesigning or adopting innovative solution alternatives

Substitute – Chamning a hazard/risk profile by considering alternative components/ fluid etc.

Engineering Control – eliminate or control hazards. They are more effective and easier to maintain once implemented with reliance on procedures or personnel. Engineering controls included the use of barriers to prevent workers or members of the public from entering a work area where hazards are present (fence around and excavation site), the installation of a guard on a piece of equipment, or installing ventilation for a work process or activity.

Engineering controls may also include but are not limited to the following:

a) Substitution of a less harmful material,
b) Isolation or enclosure of the worker or process,
c) Installation of abnormal operation sensors and emergency shutdown devices,
d) Dilution or local exhaust ventilation,
e) Use of specialized materials in the construction of the process,
f) Use of barricades or restraints to prevent employee contact with hazardous operations.

Administrative Control - may be used where engineering controls cannot be implemented. Administrative controls are acceptable procedures to control employee exposure to harmful materials, conditions, or procedures by:

a) Developing and implementing Safe Work Procedures,
b) Limiting the time of worker exposure,
c) Using a watch person for critical tasks (fire watch, traffic control, crane activities),
d) Providing worker training and supervision.

The use of Personal Protective Equipment (PPE) is the least desirable control for workplace hazards. However, in some situations, the only recourse available to provide adequate protection is the use of personnel protective equipment. The reason that the use of personal protective equipment for hazard control is the least preferred method of hazard reduction is that PPE can fail or site conditions may change so the PPE may not be sufficient. PPE should be used in conjunction with safe work procedures to ensure it is being used properly and within its design specifications.

6.4.5 Compliance Monitoring.

Regardless of the control measures that are used to protect the employee, property, or the environment from specific hazards, regular inspections, and monitoring are required to ensure that control measures remain effective.

The monitoring may be:

a) Evaluating the workplace control measures,
b) Atmospheric evaluations to determine the presence and concentration of toxic substances,
c) Area noise monitoring and/or personal noise dosimeter,
d) Inspection of personal protective clothing and equipment.

Job Hazard Analyses are dynamic tools and are required to be reviewed and modified regularly. Often, a work process changes or new hazards may be identified on repetitive operations and if the hazard analysis and control measures do not reflect these changes, they may become inaccurate or obsolete. It is imperative that these changes be included in the hazard analysis and that each person in the crew retrained.

Conditions on the site should be monitored and the hazard assessment updated as required on an ongoing basis.

Copies of the Job Hazard Analysis should be readily accessible at the work location for reference by the workers, supervisors, job managers, and safety representatives. A Job Hazard Analysis is a good tool to indoctrinate the employees whenever the work operation starts or is changed.

7. SAFETY INSPECTION

7.1 General

The rapid pace of the Tembo Nickel Project will result in a rapidly changing workplace. Tembo Nickel shall undertake several types of health and safety inspections and audits of project work sites regularly to identify and correct unsafe practices and conditions. The safety inspections are to consider all work areas including but not limited to excavations, tools, equipment, machinery, barricading, fencing and signage, buildings and temporary structures, work methods, conditions, and work practices. Safety audits will also identify non-compliance and provide recommendations that will bring about improvements.

Upon completion of the inspection/audit, all identified substandard or unsafe conditions or work practices shall be either eliminated or controlled by assigning the item to an individual who has the authority to initiate corrective action. The individual who has been advised of the unsafe condition or practice shall, without delay, investigate the issue and ensure that any necessary corrective action is undertaken. Safety Program deficiencies identified in the safety audit shall also be addressed.

Special inspections shall also be undertaken as required by an incident, accident, near miss, or equipment malfunction.

It should be noted that during the safety inspection/audit, any individual has the authority to order the immediate cessation of any work where they have reasonable grounds for believing that the work creates an immediate hazard to the health or safety of any individual.

7.2 Objective of a Workplace Inspection

The objective of a safety inspection or safety audit is to undertake the following:

a) To verify that the Health and Safety program has been effectively implemented and is functioning properly;
b) To identify (and record) potential and actual hazards associated with all work locations;
c) To recommend (and where appropriate, initiate) corrective action;
d) To monitor the effectiveness of the corrective action or existing controls.
e) Identify upcoming activities to ensure that work is administered to ensure that health and safety form an integral part of the planning and execution of the work.

7.3 Routine Health and Safety Inspection

Informal inspections are to be conducted by TNCL supervisory personnel as part of their daily routine. As part of their normal work, all supervisory representatives shall regularly carry out informal health and safety inspections to ensure that all work locations and work activities under their direction and control are maintained in a safe condition and that individuals carry out their tasks without undue risk.

Another component of the supervisor's inspectional responsibilities is to look forward to the activities that will be happening that day and over the next few days. This allows for planning for safety in conjunction with the existing conditions. TNCL employees shall also contribute and participate in informal inspections of their work area. Unsafe practices or conditions shall be either corrected or brought to the attention of an individual who has the authority to initiate corrective action.

Supervisory personnel shall maintain accurate and up-to-date records of routine health and safety inspections. The inspection records shall be subject to review by the TNCL OHS department.

7.4 Planned Safety Inspection

7.4.1 General

Tembo Nickel shall develop and implement a Planned Safety Inspection Program that will be undertaken at intervals that will prevent the development of unsafe conditions or practices. These documented inspections require a systematic tour of the worksite to identify all hazardous conditions, unsafe work procedures, or non-compliance. The equipment, conditions, work practices, and safety compliance of all work sites shall be included in Planned Safety Inspections.

Tembo Nickel shall instruct their employees on their responsibilities concerning Planned Safety Inspections. Department managers shall determine who undertakes these inspections and the frequency they are to be conducted. Safety inspections are to be conducted no less than once per day. Tembo Nickel shall inspect work sites on a more frequent basis where the nature of the work presents significant risks. A record of the inspection findings shall be maintained and made available for review.

A Corrective Action Request (CAR) (Appendix 6) shall be issued to a work unit if the inspection identifies non-compliance or sub-standard acts or conditions. The CAR shall indicate the location, time, and date of the noted sub-standard condition/act, stop work issued, date for expected completion, and remedial actions taken.

The completed form shall be forwarded to the Tembo Nickel OHS department for review and retention.

7.4.2 Pre-inspection Procedures

Inspection shall be conducted by personnel who have previous experience with the work presently being undertaken or the work being planned. Inspection personnel should be familiar with the nature of the work to be carried out and the potential hazards associated with the work.

a) Be familiar with the work locations.
b) Be prepared to review First Aid records to identify accident trends.
c) Review previous inspection reports to review problem areas. Develop a checklist of commonly reported hazards from previous site inspection reports or Tool Box meetings.
d) Identify safe work procedures and planned work activities.
e) Identify activities that are high risk for injury or have a high financial loss potential.
f) Ensure inspections are given adequate time to carry out an effective inspection.

7.4.3 Inspection Procedures

The basic procedure for conducting a Planned Safety Inspection is as follows:

a) Take the time to observe the activities of all work tasks being carried out.
b) Take immediate corrective action where there is an imminent danger.
c) Record all existing unsafe acts or conditions.
d) Verify that previous recorded hazards have been corrected.
e) Identify corrective action required for each unsafe act or condition.

f) Complete the CAR and provide a copy to the workplace management team.

g) Identify personnel responsible for each corrective action and assign a date/time for completion.

h) Follow up to ensure that the corrective action has been completed.

7.5 Field Level Risk Assessment (FLRA)

A Field Level Risk Assessment (FLRA) should be completed for each site visit by department managers, contract engineers, consultants, and safety personnel. The FLRA intends to capture activities where safety procedures are being followed or where safety deficiencies may be present. It provides for a continuous improvement process where all levels of the project organization are accountable for managing safety. See Appendix 5 for a sample FLRA.

7.6 Employees Inspections

Tembo Nickel employees shall ensure that their tools and equipment and their work areas are inspected daily. Employees are to correct unsafe conditions where practicable (examples: move debris, flag a hazard, a ladder with a broken rung should be removed from service). Other hazards are to be immediately reported to their supervisor.

Employees shall endeavor to identify a work process that is infrequently conducted and presents a significant safety or environmental hazard.

Where these tasks have been identified, a written Job/Task Hazard Analysis and Safe Work Procedures shall be developed and reviewed with all employees conducting the task.

7.7 Equipment Inspections

Competent personnel shall conduct a daily, before-use inspection of all tools, equipment, and machinery in accordance with the manufacturer's recommendations. Mobile equipment must be inspected before starting or putting the machine in motion. Equipment is to be inspected by competent personnel for the condition of steering, brakes, controls, displays, guards, safety devices, and other components that, through wear or fatigue, could fail and contribute to an accident. Logbooks shall be maintained for all construction equipment.

Special inspections shall be undertaken for any equipment or machinery malfunction, which had the potential for loss.

7.8 Joint Health and Safety Committee Inspections

The Joint Health and Safety Committee is to schedule regular planned inspections, carried out of all work areas by representatives from the TNCL Joint Health and Safety Committee. Typical representation includes one representative from management and one employee. A record of the inspection team's findings shall be kept and forwarded to the Safety Committee for discussion at the monthly meeting. Particular attention shall be paid to previously recorded hazards to verify that control measures are in place.

7.9 Health and Safety Audit Program

The primary objective of a Safety Audit is to verify that the various Health and Safety Plans and Programs are being properly and effectively implemented. It will also identify any shortcomings in the program and provide recommendations to make improvements.

TNCL shall undertake Safety Audits regularly. Audits will be initiated by the TNCL-OHS department and will be carried out in consultation with a contractor's Site Safety Representative. Copies of all audit documentation will be retained by the TNCL-OHS department.

8. EMERGENCY REPORTING AND RESPONSE

8.1 General

All Tembo Nickel Project personnel are required to immediately report all injuries, accidents, incidents, near-miss incidents, or other emergencies to their supervisor who will immediately initiate the appropriate response.

Tembo Nickel Project representatives are immediately notified of any accident, incident with a potential for a significant loss, near-miss incident, or release of hazardous or toxic substances that may have the potential for environmental impairment, equipment, or property damage. In addition, all incidents involving any injury to the general public or any incident where media coverage may be anticipated shall be immediately reported.

There is a need for Tembo Nickel personnel, contractors, and all other Project personnel to be familiar with the Project's emergency preparedness, emergency notification, and emergency response procedures.

Tembo Nickel is responsible for ensuring that all applicable regulatory agencies are immediately notified of any reportable incident. Key Tembo Nickel and other project personnel have additional responsibilities including but not limited to immediate notification to individuals from senior management, field personnel, public affairs, health and safety representatives, environmental management, and risk management representatives.

8.2 Emergency Plan

Tembo Nickel shall develop an Emergency Response Plan appropriate for activities at the time. The plan must be updated as the need arises. Procedures must be thoroughly outlined and made known to all Tembo Nickel personnel.

Procedures must consider the following items:

a) Identification of potential emergencies appropriate to the hazards and potential risks associated with the worksite;
b) A plan of the work area that shows evacuation routes as well as the location of emergency equipment, first aid services, fire suppression equipment, and the location of stations or signs for directing emergency service vehicles;
c) A method for sounding the alarm and reporting the emergency, as well as an all-clear signal;
d) The location of the assembly area and a system to account for all personnel;
e) Contact phone numbers for emergency response services and key project representatives;
f) A list of personnel responsible in emergencies and how to contact them;
g) The identification of the roles and responsibilities of key site response personnel as they relate to the emergency;
h) Contractor's procedures for the safe shutdown of the worksite/equipment;
i) Designated access route(s) for emergency service vehicles;
j) Designated person(s) to meet and direct emergency service vehicles;
k) A map showing the routes to the nearest hospitals and medical clinics;
l) Evacuation, and rescue procedures, as necessary;
m) A plan for practicing the evacuation and testing the suitability of the accounting system;
n) A plan for checking the availability and operability of the emergency equipment frequently;
o) Investigation and correction of hazards.

The Emergency and Evacuation Plan and Procedures shall be discussed at the employee Safety Orientation. Site Evacuation Plans shall be posted in conspicuous locations around the work site.

8.3 Priorities

Priorities in the event of an emergency are as follows:

a) Protect yourself from risk
b) Ensure medical aid/emergency responders are notified, (remove the victim from immediate danger, as necessary)
c) Secure the area to prevent further injuries, protect the public and/or property damage,
d) Attempt to fight a fire or control a hazardous spill only if qualified
e) Initiate measures to control traffic flow through the area, as necessary
f) Notify appropriate personnel immediately
g) Preserve evidence until the investigation is complete
h) Ensure that the necessary report forms have been completed

8.4 Emergency Notification Process

Identify the seriousness of the situation and initially determine if on-site resources cannot bring the situation under control. Assuming that the situation is of such a magnitude that the individual who first becomes aware of it cannot safely provide immediate assistance to all personnel who may be injured or in imminent danger, then that person's responsibility is the immediately sound the alarm to summon First Aid or evacuation and the notification of senior site representatives of the specific location and facts of the incident. It is better to overestimate the seriousness of the situation than to underestimate or ignore it. Do not hesitate to initiate contact with Emergency Response Organizations (i.e. ambulance, firefighters, and police).

The Incident Notification Flow Chart (Appendix 6) outlines the notification process that shall be used for reporting emergencies, including serious accidents or incidents.

9. FIRST AID REQUIREMENTS

9.1 Introduction

The purpose of this section is to ensure that employees injured at the project receive quality care from qualified Occupational First Aid Attendants. TNCL recognizes that each emergency is different from the next and by ensuring that a consistent response to all situations is provided, injured personnel will receive the necessary treatment. The following procedures are to be used as a guideline for all emergency first-aid situations and are designed to enhance the role of the Occupational First Aid Attendant.

TNCL shall ensure all first aid services, supplies, and equipment have been provided unless other arrangements have been agreed upon with the contractor(s). The contractor must also provide all first aid services for their subcontractors.

Contractors must ensure that workers receive instruction in the procedure for summoning first aid and reporting injuries.

9.2 Reporting of Injuries

Workers who sustain a work-related injury or illness, regardless of seriousness, must immediately report it to the TNCL site clinic for treatment. The worker shall also immediately report the injury to their immediate supervisor. This will ensure that each injury receives appropriate medical attention the potential for complications and infections will be significantly reduced and action can be initiated to prevent a recurrence.

9.3 First Aid Service Roles and Authority

The role of the Occupational First Aid Attendant is to:

a) Promptly provide workers with the level of care to treat the injury,
b) Positively affect the outcome of the work-related illnesses and injuries that could occur on the project,
c) Objectively record observed or reported signs and symptoms of work-related injuries or illnesses, and,
d) Refer to medical attention, all injuries or illnesses that are recognized as being serious or beyond the scope of the attendant's training.

Occupational First Aiders are in complete charge of all first aid treatment of injured workers until medical aid is available. Management or supervisory personnel must not overrule the attendant's decisions relating to first aid or the recommended means of emergency transportation to a medical facility. When the worker reports an occupational injury or illness to an Occupational First aid, the attendant shall not refer the worker back to work until the attendant is satisfied that first aid treatment is complete.

The provision of first aid services is the main function of the Occupational First Aiders. The assignment of supplementary duties to the Occupational First Aider is secondary and at no time is it to take priority over the immediate care of the injured worker.

9.4 First Aid Treatment Records

The TNCL site Clinic shall record all first aid treatments rendered in a First Aid Treatment Record Log Book. The worker shall sign this Record Book as written notification of the injury or illness. Information to be recorded in the Accident Record Book includes the worker's name and company, date and time of injury, a brief description of where and how the injury occurred, a brief description of the injury, date and time of the treatment given, nature of the treatment given, name and signature of the First Aider.

If necessary, the worker may report directly to a doctor but must subsequently, at the earliest opportunity, provide the employer with information regarding:

a) Cause and type of injury or illness;
b) Reasons for going directly to the doctor;
c) Date and time of visit;
d) Doctor's directions;
e) Date and time of injury;
f) Witnesses; and,
g) Doctor's name and location.

First aid records and statistics shall be reviewed by TNCL Health and Safety Department to determine trends and assist with corrective actions.

9.5 Reporting Guidelines

9.5.1 Introduction

TNCL has established the following definitions for Near Miss and First Aid incidents and other retrospective data collected after the incident has occurred reflecting the actual Project safety program performance. These indicators shall be used for incident classification and monthly reporting to the TNCL- OHS department.

- **Near Miss Incident**: A Near Miss Incident is a work-related event that did not result in first aid or medical treatment but had the potential to result in a workplace injury.
- **First Aid Case**: A First Aid Case is a work-related injury that only requires a one-time treatment by a first aid provider, and that allows the affected worker to return to work immediately, with the possibility of some follow-up observation or monitoring. A First Aid is normally treated at the work site or a site medical clinic, or may occasionally necessitate the involvement of a physician or medical treatment facility. The application of non-prescription medication, ointments, salves, antiseptics, and dressings to minor injuries and illnesses is considered to be a First Aid.

9.5.2 Lagging Indicators

Lagging indicators reflect retrospective data collected after an incident has occurred, reflecting actual performance.

Tembo Nickel OHS department has identified the definitions for lagging indicators that are provided below and should be used for incident classification and reporting to the TNCL- OHS department.

First Aid Case (FAC): A Medical aid injury is an occupational injury or illness, which has not been classified as a LTI or RDI, which requires treatment beyond first aid. Medical treatment injuries include:

a) Any work-related injury resulting in a loss of consciousness.
b) Use of prescription medication, i.e. medication that can only be prescribed by a medical practitioner/ physician.
    - Except for a single dose of prescription medication administered on the first visit to the physician (e.g. eye drops to dilate pupils).
c) Use of stitches/sutures or staples to close a wound.
d) Infection from a work-related injury requiring antibiotics.

e) Second and third-degree burns – based on the treatment required and the risk of infection e.g. a burn from a small drop of molten metal to the wrist may only require first aid treatment, whereas if a broader area is affected then medical treatment may be required.
f) Removal of foreign bodies from the eye requires more than irrigation or cotton swabs to remove them.
g) The use of casts, splints, or other rigid stays to immobilize parts of the body.
h) A positive x-ray diagnosis for fracture(s).
i) Surgical removal of foreign material or dead skin, i.e. surgical debridement.
j) Removal of a fingernail or toenail.
k) Extensive, long term or ongoing physiotherapy or chiropractic treatment prescribed for rehabilitation purposes and not preventive measures. For example: a series of five or more treatments by a physiotherapist or chiropractor or treatment carried out longer than one month in duration.
l) Admission to hospital for observation for more than 12 hours.
m) Note: MTIs involving visitors are reported here.

Restricted Duty Injury (RDI): A Restricted duty Injury is an occupational injury, illness, or disease that causes a worker to be physically or mentally unable to perform all, or part of, their normal duties or role during any rostered shift after that on which the injury, illness or disease occurred.

For example:

a) the employee was assigned to another job temporarily, or
b) the employee worked at a permanent job less than full-time. Time away from the job to receive medical or first aid treatment is not to be considered as working less than full-time.
c) the employee worked at their permanently assigned job but could not perform all the duties normally connected with it.
d) A restricted duty injury is registered as a TNCL safety statistic when the injury is confirmed as a work-related compensable case by the jurisdictional workers' compensation board. The injury must also be confirmed by a medical practitioner/physician, as deemed appropriate by the jurisdictional workers' compensation board.
e) **Note**: RDI's involving visitors are reported here

Lost Time Injury (LTI): A Lost Time Injury is an occupational injury or illness that causes the injured worker to be unable to work for any full shift, subsequent to that on which the injury occurred. A lost time injury is registered as a TNCL safety statistic when the injury is confirmed as a work-related compensable case by the jurisdictional workers' compensation board. The injury must also be confirmed by a medical practitioner/physician, as deemed appropriate by the jurisdictional workers' compensation board.

- A fatality is also recorded as an LTI.
- Note: LTI's involving visitors are reported here

Lost Time Days: The number of full calendar days an injured worker was unable to work due to an occupational injury or illness, from the first rostered day absent after the day of the injury.

The day of the injury is not included.

a) Less than a full day lost (i.e. 0.5 LTID) is not considered a lost time injury day but rather a restricted work injury day (see RDID definition).
b) In the case where a worker is scheduled to go on annual leave/vacation following the injury, days certified as 'lost' shall still be reported as such, despite the contractor not being scheduled to attend work.
c) Lost days shall be accumulated every month until the ill or injured worker returns to work (in any capacity), or up to a maximum of 180 calendar days for any individual occurrence. If a worker returns to work on restricted or alternate duties, those days shall be reported as Restricted Duty Injury Days Lost (RDID) in the month in which those days occur. See RDID definition.
d) A maximum of 180 calendar days of lost time shall be assigned to any one injury. This can be recorded across calendar years.
e) In the case of a fatality, 180 calendar days lost shall be assigned in the month in which the fatality occurred.
f) For operations operating under a fly-in/fly-out schedule, or where advanced medical care can only be provided by evacuating by flight the injured individual from the site, LTID will only be accounted for lost shifts and will exclude days where the individual was not able to return to site due to travel constraints.
g) **Note**: LTIDs involving visitors are reported here.

Restricted Work Days: The number of calendar days a worker was assigned Restricted Work Duties due to an occupational injury, illness, or disease from, but not including, the day of the injury.

Days will be accumulated until the ill or injured worker obtains complete medical clearance to return to full capacity duties or up to a maximum of 180 calendar days for any individual occurrence. If employment is terminated, 180 calendar days lost shall be assigned (i.e. 180 RDID).

If the injured or ill worker is assigned to a job that has been modified or permanently changed in a manner that eliminates the routine functions the worker was restricted from performing, the days lost count can stop when the modification or change is made permanent. For such cases, at least one day of restricted work must be recorded.

Note: RDID's involving visitors are reported here.

9.6 Calculating Injury and Illness Rates

TNCL has determined that the following rates are indicators of the level of success of the Tembo Nickel or contractor's Health and Safety Program performance and shall be forwarded by the contractor to the TNCL-OHS department (not more than 1 working day after the end of the month).

The following formulas are the methods to be used for calculating work-related lost time illness/injury frequency, medical aid frequency, recordable incident frequency, and severity rates:

Medical Treatment Frequency (MTIF) = $\frac{MTIx1{,}000{,}000}{\text{Hours Worked}}$

Restricted Duty Frequency (RDF) = $\frac{RDx1{,}000{,}000}{Hours\ Worked}$

Lost Time Injury Frequency (LTIF) = $\frac{LTIx1{,}000{,}000}{Hours\ Worked}$

Total Injury Frequency (TIFR) = $\frac{(MTI + RD + LTI) \times 1{,}000{,}000}{Hours\ Worked}$

NOTE: Use Total Hours Worked for the Month when calculating Monthly Rates. Use Total Hours Worked to Date from the beginning of the Project when calculating Total Hours to Date.

10. ACCIDENT INVESTIGATION

10.1 The Nature of Accident Investigations

All workers are required to report all accidents or incidents that result in injury, illness, or property damage and all incidents that have the potential for serious injury, property damage, or loss, including near-miss incidents. A High Potential Incident (HPI) includes high potential and near-miss incidents.

A High Potential Incident (HPI) is an event, or near miss, that could have caused a critical incident, i.e. an event, or near miss, which could have:

a) killed a person(s); or
b) cause life-threatening injury to a person(s); or
c) caused damage to assets or loss of operations to the value of greater than US$ 10 million; or
d) caused a Category 4 or Category 5 environmental incident; or
e) caused media attention / public exposure of a serious, negative consequence.
f) Critical Incident (CI) includes:
    - Injury or damage to assets or loss of operations
    - Single or multiple fatalities; or
    - Life-threatening injury to a person(s), i.e. injuries that require immediate, aggressive action by site, ambulance, and medical staff, such as urgent or emergency surgery, admittance to an intensive care or high dependency facility; or
    - Damage to assets or property, or loss of operations, to a value greater than US$10 million.
g) Environment
    - A Category 4 (Significant) or Category 5 (Very significant) environmental incident.
h) Media attention

- Media attention / public exposure of a serious, negative consequence.

Other incidents that must be reported or those incidents with the potential for environmental impairment or where negative publicity or media involvement could be anticipated. Individuals must report these accidents/incidents to their supervisor at their earliest opportunity.

An accident investigation is a systematic method to determine all relevant facts and interpretations regarding how and why an accident occurred. An investigated accident or incident will provide an example to educate others who may encounter a similar situation. The accident investigation is not only confined to finding out what happened, but it should determine why and how the accident occurred so that conclusions can be drawn regarding what must be done to prevent a recurrence. The investigation should identify the individual responsible for implementing the necessary changes within a set period. The accident investigation shall be FACT FINDING not FAULT FINDING.

The knowledgeable investigator knows in advance the general information required to complete an accurate investigation. The Investigator shall obtain all information from all available sources, including the injured person, witnesses, the accident scene, and a reenactment of the accident when necessary. Caution shall be exercised when re-enacting the sequence of events leading to an accident to ensure the accident is not repeated.

Accidents should be investigated as soon as practical after their occurrence. Witnesses should be interviewed with as little delay as possible following the accident. See the Accident Investigation Checklist at the end of this section.

10.2 Pre- Accident Activities

Where practicable, the scene of an accident or incident shall be left undisturbed until permission to clear the scene has been granted by the Senior OHS Site Representative. Exceptions include activities for rescue work or prevention of further damage or injury, in which case, photographs and sketches of the accident scene should be undertaken beforehand (where feasible).

a) The investigative team shall include both a management and worker representative who is familiar with the work being investigated.
b) A Tembo Nickel Accident/Incident Report Form.
c) Review any available information relating to the accident, such as safe work procedures, drawings, or manufacturer's information.

d) Prepare an Accident Investigation Kit including pencil/pen and paper, tape measure, camera, flashlight, Accident Investigation Report Forms, and the investigator's business card.
e) Review the supervisors' and workers' personnel files and information on training received, experience previous accidents or injuries.
f) Review the Investigation Checklist to assist in ensuring a thorough investigation.
g) A copy of the Incident Report Form, including recommendations, shall be forwarded to the Tembo Nickel OHS Manager within 24 hours of the occurrence.

10.3 Accident Investigation Activities

The three stages of accidents and incidents that should be investigated:

Pre-occurrence stage - the factors that permitted the sequence of events leading to the accident or incident. These may include contractor characteristics (trade, safety program, supervision, safe work procedures, equipment maintenance, meeting minutes, etc.) and/or worker characteristics (occupation, health, experience, training, disciplinary records, etc.).

Occurrence stage - the immediate factors in the accident or incident. These may include what the person(s) involved was/were doing (task, specific activity, posture, location, etc.), materials and equipment directly involved (type, brand, size, guarding, condition, etc.), actions and movements that led to the accident or incident (fall, trip, slip, etc.), and environmental characteristics (weather, lighting, noise, temperature, vapors, ventilation, etc.).

Post-occurrence stage - the factors occurring after the actual accident or incident that minimized or increased the seriousness. These may include the response time of emergency personnel, first aid available on-site, location and condition of emergency equipment, emergency plans, and personal protective equipment worn or unused.

a) Visit the accident or incident location. Make yourself thoroughly familiar with the area, task, machinery, and equipment involved.
b) Gather the necessary data (photos, measurements, notes, drawings, witness names, etc.).
c) Additional factors that should be considered during the investigation include:

- Equipment, machinery, tools, or materials involved;
- The environmental conditions;
- Unsafe acts, practices, or conditions involved;
- Competency of the worksite supervisor;
- Involved individual(s), occupation(s) and experience;
- Protective equipment required/used;
- Involved individual(s) pre-accident physical and mental condition(s) and capabilities;
- Worker/supervisor/job previous accident and incident records;
- Similar previous occurrences;
- Implementation status of the health and safety program.

d) Interview witnesses and other persons who have details about the incident or accident. Interviews require you to be fair and open-minded; look for facts, not someone to blame. During each interview, you should:
   - Put the individual at ease.
   - Keep the interview private (interview witnesses separately).
   - Advise each individual of the purpose of the interview, e.g., to establish the facts, not to place blame.
   - Obtain the individual's version of how and why the incident or accident occurred. **Don't look for confirmation of your own opinion**. Ask open-ended questions that require more than a "yes" or "no" answer.
   - Repeat the individual's account of the sequence of events. Attempt to clear up inconsistencies in facts. Do not make assumptions. Use diplomacy and consideration to determine what occurred.

e) Ask each interviewee for corrective action suggestions.
   - Let the individual know by what date the report will be complete.
   - End the interview on a positive note by thanking the person for their assistance.

10.4 Post-Investigation Activities

a) Review and analyze the information gathered.
b) Complete the TNCL Incident Report Form (Appendix 3).
c) Forward the completed report to the TNCL-OHS Manager. Make copies available to those who have input.

10.5 Claim Notification

In the event of an incident that is likely to give rise to a claim. It is important to facilitate prompt and proper communication between all parties. This will result in an immediate effective response to reported incidents and the swift settlement of valid claims.

Where a Tembo Nickel project representative knows about any incident that may give rise to a claim and/or receives notification of a possible claim arising out of a loss occurrence details of the incidents must be immediately passed on to the TNCL OHS department.

10.6 Typical Accident Investigation Checklist

Table 3: Typical Accident Investigation Checklist

NOTIFICATION	1.0 ENVIRONMENTAL & SITE SPECIFIC
Agencies/Associations	General Condition
Time and Date of accident	Lighting
Time and date of notification	Ventilation
Time and date of arrival on site	Wind
The first supervisory staff person notified	Temperature
	Weather condition
2.0 ACCIDENT SCENE DETAILS	Terrain
Diagram	Noise
Photos	
Measurements	3.0 PERSONAL WITH INFORMATION
	Name
4.0 WORKERS INFORMATION	Employer, home address, phone number,
Name	Recollections of incident/accident
Home Address, and Phone number	Hearsay (gossip)
Occupation	
Experience	5.0 EMPLOYER PROFILE
Training for this job	Implementation status of the safety program
Familiarity with the equipment	Written Safe Work Procedure
Personal problems on/off the jo	Address where personnel records kept
Mental/physical disabilities	Corrective action
Nature of injuries	
Doctor name, address, phone number	6.0 EQUIPMENT SPECIFIC
Next of Kin contact information	General condition
7.0 SUPERVISOR PROFILE	Make, serial and model number(s)
Name	Manuafacture information
Experience as Supervisor	Layout operations
Experience in job worker was doing	Maintenance information and records
Personal knowledge of worker	Suitability for the job
Method of supervisor	
Management Instructions	8.0 OTHER PARTY(S) INVOLVED
Opinion. How did the accident/incident	Instructions

Opinion preventable? How?	Experience in industry
	Experience in job
9.0 FIRST AID SERVICES / TREATMENT	Supervision
Services available used	Training
Name of attendant certificate level	Knowledge of project requirements
Treatment given	Familiarity with the equipment involved
	Role od involevement in the incident
	10. GENERAL COMMENTS/OBSERVATIONS

11. HEALTH AND SAFETY REQUIREMENTS

11.1 Introduction

The following health and safety requirements apply to all Tembo Nickel Project personnel, including consultants, contractors, subcontractors, and other project participants. Since this document does not and cannot contain every rule and requirement necessary for the safe performance of work, all workers and supervisors must use personal initiative alike. The Occupational Health Requirements shall be observed as per the Occupational Health and Medical Plan.

Reference: TNCL-OHS-PLN-0002, Occupational Health and Medical Plan.

11.2 Project Requirements

11.2.1 Work Restrictions

No employee shall carry out any work process or operate any tool or equipment when that person has reasonable cause to believe that to do so would create an undue hazard to the safety of any person.

11.2.2 Correction of Unsafe Conditions or Work Practices

Unsafe or harmful conditions or work practices shall be remedied without delay. Whenever an individual observes what appears to be an unsafe or harmful condition or act that constitutes an immediate threat to any worker, that individual has a responsibility to stop the work in progress and discuss the situation with the individual involved. Should the person or group performing the unsafe act be unwilling to stop the work, the matter should be brought to the attention of the supervisor immediately. The supervisor must investigate the reported unsafe condition or act and ensure that any necessary corrective action is taken without delay.

If emergency action is required to correct a practice or condition that constitutes an immediate threat to personnel, only those qualified and properly instructed workers necessary to correct the unsafe condition should be exposed to the hazard, and every effort must be made to control the hazard while the emergency action is being carried out.

11.2.3 Hazard Reporting

a) Report all hazards immediately to your supervisor. Where possible, personnel should attempt to eliminate or control the hazard if it is within their jurisdiction.
b) If the risk is serious, put up a temporary barrier, attach a “danger” tag, or take any other appropriate steps to prevent possible accidents or personal injury; then report it to your immediate supervisor.
c) If the hazard is easily correctable, correct it if authorized, and bring it to the attention of your immediate supervisor. Trade jurisdiction does not apply to situations of immediate danger to life or health.

11.2.4 Authorised Operation of Machinery or Equipment

Tools, equipment, and machinery shall be operated only by authorized personnel who have demonstrated an ability to safely operate the machinery or equipment. Records of training and authorization shall be maintained for review.

11.2.5 Circumvention of Safeguards

A person must not intentionally remove, impair, or render ineffective any safeguard provided for the protection of workers or the general public.

11.2.6 Improper Conduct

Project personnel shall not knowingly or intentionally engage in hazardous behavior. Another type of behavior that is unacceptable on the project includes horseplay, practical joking, and violence in the workplace.

11.2.7 Working Alone

a) Never work alone in isolated areas or undertake hazardous tasks unless arrangements have been made for periodic checks with another individual or a means of communication to summon assistance is readily available.

b) A written procedure for checking an employee's wellbeing, that outlines the time interval and provisions for summoning help if required, must be developed, where an employee is assigned to work alone or in isolation and if the worker would be unable to secure assistance in the event of a disabling injury.

c) This procedure shall be developed in consultation with the employees and the Joint Health and Safety Committee representative.

d) A specific person must be designated to check on the employee at predetermined intervals, including shift end and the checks are to be logged. The preferred method for checking is visual or two-way voice contact. Where this is not practicable, the system must allow the employee to call or signal for assistance.

11.2.8 Right to Refuse Unsafe Work

a) Project personnel shall not carry out or cause to be carried out, any work process, or operate or cause to be operated any tool, machinery, or equipment, that would create an undue hazard to any individual's health or safety, (undue hazard means: a danger that is not normal for that occupation or a danger under which a person engaged in that occupation would not normally carry out the work).

b) Individuals who exercise their right to refuse unsafe work must immediately report the safety concern to their supervisor. The individual may be temporarily assigned to alternative work at no loss in wages until the matter is resolved. Individuals shall not be disciplined for exercising the right to refuse unsafe work. The supervisor must investigate and either correct the problem or inform the individual that the report is not valid. If there is no resolution, the supervisor must re-investigate in the presence of the individual or their elected representative

c) If there is no resolution, the supervisor and the individual or the individual's representative must notify the Tembo Nickel safety representative who will then investigate (refer; to Stop Work Authority Policy & Procedure).

11.2.9 Fitness for Work

TNCL is committed to providing a safe and healthy work environment for all employees and project participants. As part of this commitment, TNCL will maintain rules, practices, and procedures with firm and fair enforcement and communicate these rules, practices, and procedures. At the same time, Tembo Nickel expects project employees to be efficient and productive in performing their assigned tasks and to report to work in a timely manner and in a condition that will not in any way adversely affect the performance of their work.

The ability of employees to work injury-free is contingent upon being in a physical and mental state of wellness that allows them to perform all aspects of their work that will not endanger themselves, their fellow employees, the general public, or the environment.

11.2.10 Impairment

The following standard requires an equal commitment on the part of TNCL, employees to accept responsibility for their own safety and the safety of their fellow employees. TNCL shall be required to take all reasonable steps to ensure that its employees comply with this procedure.

a) It is the responsibility of all Tembo Nickel personnel and other project participants to be capable of working in full possession of his/her faculties.
b) The Tembo Nickel Project prohibits the illegal use, sale, purchase, transfer, possession, or presence in an employee's bodily system of any drugs, other than medically prescribed drugs while on project property. It also prohibits the use, sale, transfer, or possession of alcoholic beverages by project participants while on the project property.
c) The possession or use of illegal drugs or consumption of alcoholic beverages on project sites shall result in disciplinary action. Any employee deemed unfit to perform their assigned duties because of the influence of drugs or alcohol shall be subject to disciplinary action.
d) Any project participant who is using a physician-prescribed or non-prescription drug shall take that drug as directed and should be aware of any potentially unsafe side effects. If the employee is unsure of the side effects of a prescription or non-prescription drug, they shall consult with a physician or pharmacist.
e) Any employee under the influence of medication that will or may affect their ability to conduct their duties safely shall provide this information to their supervisor and shall request reassignment to alternate duties. An employee deemed unfit to conduct their assigned duties safely, because of the influence of medication, may be subject to

reassignment to alternate duties. Prescription drugs taken under a doctor's prescription and direction, that do not impair the worker's ability to do the work assigned, do not apply to this requirement.

f) A supervisor is to take immediate action if it is believed, on reasonable grounds, that an employee's ability to safely and satisfactorily conduct the assigned job duties is in breach of these requirements.

For greater clarity and by way of example only, "reasonable grounds" include:

a) Specifically, a situation where the smell of alcohol is detected on an employee's breath while at work; and,

b) Generally, a situation where an employee is acting suspiciously or unusually or where an employee has been unable to correct a chronic performance or behavior problem at work gives rise to a reasonable suspicion on the part of the employee's supervisor that the employee may have consumed or used alcohol or drugs on the project or may be under the influence of alcohol or drugs and which suspicion cannot be dispelled by the employee.

11.2.11 No Smoking Areas

Smoking is permitted only in designated areas.

11.2.12 Bending and Lifting

a) Do not attempt to lift or move objects that are obviously too heavy or bulky or that require getting into an awkward position. Seek assistance.

b) Ensure you have a firm grip on the object before lifting it, and ensure your hands and body are clear. Ensure that you have a clear view of your route when carrying materials.

When lifting:

a) keep your back as upright as possible;

b) use leg muscles instead of back or stomach muscles; and,

c) avoid twisting motions.

11.2.13 Contact with the Public

Project personnel are expected to maintain good relations with the general public and to exert every effort to prevent damage to public property. Complaints or queries from the public that can't be resolved on the spot shall be forwarded to the individual's supervisor. Project personnel shall only answer questions from the general public, for which they are qualified to answer.

11.3 Personal Protective Equipment

11.3.1 Safety Headgear

Approved hard hats shall be worn at all times on all construction sites. A chinstrap shall be worn when there is a potential of the hard hat falling off or becoming dislodged.

11.3.2 Safety-Toe Footwear

Approved safety-toe footwear with penetration protection and above-the-ankle support properly laced shall be worn at all times on all project work sites.

11.3.3 High Visibility Vests

Approved high visibility vests shall be worn at all times on all project work sites.

11.3.4 Safety Eyewear

Approved safety eyewear with side shields shall be worn on all work sites.

11.3.5 Hearing Protection / Audiometric Testing

Approved hearing protection devices shall be worn when noise levels exceed acceptable limits.

11.3.6 Respiratory Protection

Respiratory protection is required when an employee is or may be exposed to concentrations of an air contaminant over an applicable exposure limit or to an oxygen-deficient atmosphere. Employees must be provided with, trained in the use of, and wear suitable respiratory protection.

In a construction environment, many work processes may cause contaminants to be introduced into the air we breathe. Where it is not practicable or possible to eliminate these contaminants through engineering or administrative controls, TNCL is responsible for developing and implementing all aspects of the Respirator Protection Program, including reference to hazard assessment, provision, inspection, maintenance, and repair of all respiratory protection equipment, the fit testing and training of employees and the maintenance of all associated records.

TNCL will be required to establish, implement, and maintain a Respiratory Protection Program appropriate to the work being performed. As a minimum, a Respiratory Protection Program should address the following program elements:

- Responsibilities,
- Definitions,
- Hazard Analysis,
- Selection of Respirator Type and Filter,
- Fit Testing,
- Maintaining Respirators,
- Training employees regarding Respiratory Hazards,
- Training employees in the Use, Inspection, Maintenance, and Cleaning,
- Records Retention and Program Review

11.3.7 Personal Attire

Due to the operational environment where the presence of mosquitoes carrying the Malaria parasite is extreme, All employees are required to wear long-sleeved shirts and full-length pants. Long hair must be secured.

11.3.8 Malaria Management

Without exception, all personnel are to be on a doctor-approved anti-malaria medication for the duration of their time on the Tembo Nickel Project. As part of the fit-for-duty requirements, all personnel must complete a pre-employment physical.

11.4 Safe Work Practice

11.4.1 Crane and Hoists

TNCL Department Managers, Field Supervisors, or General Forepersons shall ensure that a review has been undertaken to determine that the operator of any crane and hoisting equipment is proficient, knowledgeable of the equipment and the work at hand, and competent to operate the specific hoisting or lifting equipment.

All cranes and hoists shall be operated, tested, and maintained in accordance with:

a) Manufacturers Specifications.
b) CSA Z150-1974, “Safety Code for Mobile Cranes”, or equivalent
c) CSA Z150-1977, “Supplement No. 1 to Z150-1974”, or equivalent

d) CSAZ256-1987, “Safety Code for Material Hoists”, or equivalent

Crane Inspections, Testing, and Log Books

a) The owner of a crane or similar hoisting device shall keep a permanent record of the full history of all inspections, tests, repairs, modifications, and maintenance of each crane or hoisting device. These will be made available upon request.
b) Each crane or hoisting device will be load tested and will have all structural components including, boom, hoist/hook assembly inspected and *certified* at least once every twelve months.
c) Each crane or hoisting device on the project site shall at all times have its log book that will include all inspections, test results, repairs, modifications, rope changes, and maintenance for the immediate preceding twelve months before first use at the site - and for the entire period that the crane or hoisting device is on the site.
d) Whenever sudden and unusual shock loads are applied to a crane or hoisting device, it shall be removed from service immediately and shall be subjected to complete inspection, testing, and *certification* by a third-party agency before work.

All certifications shall be performed by a professional engineer competent in the area of specific knowledge required for the certification of cranes, and who is registered in the province or region in which the project is located.

Traveling with a Load

Extreme caution will be exercised when traveling with a load and the following precautions will be taken:

a) The traveling procedures will be in accordance with the manufacturer's recommendations.
b) Ground irregularities will subject the carder, boom, and suspension to additional shock loads, which will be compensated for by reducing the hook load, or by leveling the ground.
c) Negotiation of slopes by cranes traveling with suspended loads will be avoided.
d) The boom will generally be carded in line with the direction of motion.
e) Where permitted by the design, the crane operator will remain in the crane cab to control the load and a second operator will be used to drive the vehicle. The signalman (with the assistance of others, if required) will coordinate the operation, walk ahead of the load, and warn of hazards.
f) The load will be kept as close to the ground as possible such that the length of the hoisting cable between the boom point and load is as great as possible.

g) The crane will be snubbed to prevent it from running away if the clutch or brakes fail on steep slopes or in hazardous conditions.

Operation

The operator of a crane or hoisting device will:

a) Be trained certified and authorized to operate the lifting device.
b) Familiarize themselves with the equipment and its proper care.
c) Perform and log a "Daily Crane Safety Inspection" on electrical, pneumatic, cooling, mechanical, hydraulic, suspension, structural, and safety devices on a daily or more frequent basis in accordance with the manufacturer's requirements.
d) Test all controls at the start of each shift (if any functions do not operate properly, they will be repaired before any operations begin).
e) Notify the next operator of any defects upon changing shifts.
f) Be responsible for those operations under his direct control (whenever there is any doubt as to safety, no operator will operate a crane until safety has been assured).
g) If there is a warning sign on the switch or engine starting controls, no person will close the switch or start the engine until the warning sign has been removed by the person placing it there.
h) Know that the weight of the load to be lifted is within the capacity of the machine.
i) Do not engage in any practice which will divert attention from the operation of the machine.
j) Either have a clear and unrestricted view of the load and the operational area or act upon the instruction of the appointed signalman/radioman.
k) Not hoist any equipment or load until safe working conditions have been assured, or orders to proceed have been issued by the appointed signalperson.
l) Respond to signals only from the appointed signalperson but obey a **STOP** signal at any time no matter who gives it.
m) Not leave his position at the controls while a load is suspended.

If power fails during operation, the operator will immediately set all brakes and locking devices, and communicate with the individual in charge. If practical, a suspended load should be landed under brake control.

Before leaving his machine unattended, the operator will, insofar as practical:

a) Land any attached load.
b) Ensure the boom is not left suspended over operating equipment.

c) Tie-back hook to the crane.
d) Set all brakes and locking devices.
e) Secure the unit against accidental travel and inadvertent movement.
f) Lock doors to prevent unauthorized access.

When a high wind warning is issued, the crane will be completely secured. On cranes with hydraulic booms, the boom will be fully retracted.

When handling loads the operator will:

a) Ensure the load is kept under control at all times and, where necessary, AT ALL TIMES one or more guide ropes or tag lines will be used to prevent the rotation or other uncontrolled motion of the load. The length of the tagline will be sufficient to ensure that the worker controlling the tagline cannot be struck by any movement of the load.
b) Ensure loads are not hoisted when uninvolved workers are within range of a falling load.

Obstructed Vision

Whenever the operator has his vision obstructed, a single competent signalman will be stationed:

a) In full view of the operator.
b) With a full view of the intended path of travel of the equipment, load, or components, yet clear of the intended path of travel.

He will assist the operator by keeping the obstructed part of the equipment under observation and when it is out of view of the operator, by communicating with him by the use of visual signals or a suitable communication system.

The signalman will:

a) Be fully qualified and competent.
b) Wear high-visibility gloves and a vest.

Use hand signals only when conditions are such that his signals are visible to the operator (the signaller will review the signals before starting the operation), otherwise, use radio communication.

11.4.2 Demolition Safety

a) Where the work has the potential to impact adjacent property, buildings, roadways, sidewalks, walkways, power poles, existing utilities, or the general public, Tembo Nickel shall provide additional separation between the work and the existing facilities by

installing all necessary fencing, hoarding, barricades, signage, lighting or overhead protection and any other means necessary to provide positive protection.

b) Tembo Nickel shall make every effort to control dust emissions and make every effort to ensure that excessive material does not accumulate on adjacent pathways or roadways.

c) A Pre-Demolition Checklist shall be undertaken and documented prior to the start of demolition to ensure that

- The facility is vacant,
- All hazardous materials have been removed, and,
- All material supplies and equipment have been removed.

11.4.3 Electrical Safety

a) All temporary wiring must be installed and maintained in accordance with applicable electrical codes.

b) Temporary electrical cords are to be kept clear of locations where they may be subjected to damage or present tripping hazards.

c) Splices in electrical cords must retain the mechanical, water penetration, and electrical strength of the original. Typically spliced electrical cords should be removed from service.

d) Energized wiring in junction boxes, circuit breaker panels, etc. must be protected from accidental contact whenever they are left unattended.

Temporary lighting lamps that are broken or burned out are to be removed from service. Bulbs must not be removed from other areas to provide lighting.

Under no circumstances shall employees (other than qualified, properly instructed employees working in an emergency) work, materials be stacked, scaffolds erected, or tools and equipment be operated in proximity to powerlines within the limits of approach specified below:

Sufficient distance shall be added to the specified distance to prevent unplanned or accidental movements bringing the worker, tools, equipment, or material within the specified distance. The specified distance used applies to all parts of the equipment, including booms, hoisting cables, and any part of the load being raised. Distances shall be increased to provide for any change in boom angle, the swing of the hoisting cable, and the load while it is being raised, lowered, or moved laterally, to ensure that safe distance is maintained at all times.

Table 4: Voltage and Distance

Voltage	Minimum Distance
Phase to Phase	
Over 751 V to 75 Kv	3.0 meters (10 feet)
Over 75 kV to 250 Kv	4.6 meters (15 feet)
Over 250 Kv to 550 Kv	6.1 meters (20 feet)

When job circumstances require that work be done closer than the limits of approach stated above, the following procedure must be followed prior to commencing work.

- Employees (other than qualified electricians) and equipment must not touch or handle electrical guarding. Whenever guarding is used, a qualified safety watch (trained and experienced journeyperson electrician) must be posted to control the approach of equipment, tools, and workers, and prevent contact with the guarding.

11.4.4 Electrical Work Platforms and Aerial Devices

a) Elevating work platforms and aerial devices shall only be operated by authorized personnel who have demonstrated an ability to safely operate the equipment.
b) A manufacturer's "Operation Manual" shall be located on each piece of equipment. Operators shall inspect and operate the equipment in accordance with the manufacturer's Operation Manual. Elevated work platforms shall be inspected before use and all entries completed in a logbook.

11.4.5 Excavation, Shoring and Trenching

a) Excavation work must be carried out in accordance with the specifications and requirements of a registered professional engineer and/or International OHS standards. If engineered, documentation is to be available at the H&S department.
b) The location of underground utility services must be accurately determined before starting excavation work. When referring to As-Built Drawings to determine the location of the buried/hidden utility personnel must ensure that the latest drawings are referenced.
c) Excavation work close to a utility must be undertaken in conformity with applicable regulations and with the requirements of the owner of the service.
d) Consideration shall be given to providing additional support to power poles and fencing that is installed adjacent to excavations and where vehicle traffic close to excavations

may cause ground vibration. Do not probe with pointed tools to find underground electrical services.

e) Consideration must be given to ensure that vibration caused by vehicle traffic does not adversely affect the integrity of excavation walls.

f) Employees must not enter any excavation more than 1.2 meters (4 feet) deep unless:
   - The sides of the excavation are sloped at a safe angle or in accordance with the written instructions of a Registered Professional Engineer; or,
   - The sides have been supported by the use of sheet piling, shoring, and bracing, or by a manufactured trench box or,
   - The employees are protected by other acceptable means.

Copies of the Registered Professional Engineer's written instructions, as noted above, shall be current and readily available with the original kept on file and a copy at the work site.

a) Sloping of the sides of excavations may replace shoring where employees have protection equivalent to that provided by shoring. Materials such as rocks or stumps are to be removed from slopes where there is a danger that they may become dislodged.

b) Trench support systems must be inspected daily and maintained in effective condition.

c) Shoring uprights must extend from at least 30cm (1 foot) above ground level to within 60cm (2 feet) from the bottom of the trench. Exception: Shoring extensions are not required where traffic-crossing plates are to be used provided that measures are taken to prevent material from falling into the excavation.

d) The work procedures for installation or removal of shoring must ensure that employees are not exposed to undue risk. In general, shoring must be installed from the top down and removed in reverse order.

e) When employees are required to enter excavations more than 1.2 meters (4 feet) deep, a ladder extending from the bottom to 1 meter (3 feet) above ground level must be provided within 7.5 meters (25 feet) of the work area.

f) Excavated material must be kept back a minimum distance of 60cm (2 feet) from the edge of the trench and 1.22 meters (4 feet) from the edge of any other excavation.

g) Water must not be allowed to accumulate in excavations where it may affect the excavation's stability or endanger workers.

h) Where dump trucks or like vehicles are backfilling from or maneuvering at the excavation edge, wheel stops or a spotter is to be used.

11.4.6 Equipment Isolation / Lock-out

No work shall be undertaken on any machinery or equipment where unexpected energization, start-up, release of stored energy, or discharge of hazardous substances could result in injury or damage unless the control devices are locked in the inoperative position.

11.4.7 Fall Protection and Working at Elevation over 1.8m (5.9ft)

When working at elevations over 31.8 meters (5.9 feet) a method of fall prevention or protection must be installed.

Fall Prevention or Protection Methods:

a) **Guardrails and Barriers**: When working over 1.8 m above grade, consideration should first be given to installing guardrails or barriers.
b) **Fall Restraint**: Where guardrails are not practical, fall restraint should be considered.
c) Lifeline and Harnesses: In situations where fall restraint equipment is inadequate for fall protection, employees shall wear fall arresting equipment. Fall arresting equipment consists of an approved full-body harness attached to a securely anchored lanyard and lifeline. Fall potential must be limited to a drop of not more than 1.2 meters (4 feet). Employees shall personally inspect their fall protection harnesses and lifelines before each use.

d) **Note**: Control Zones: When working no closer than 4 meters (13 feet) to the edge of a level structure, no fall protection systems are required, provided a “Control Zone” is established.

Employees shall have their immediate supervisor’s permission to bypass guardrails or barriers erected to prevent them from entering areas where there is a falling hazard. Where it is necessary to temporarily bypass guardrails or barriers, employees shall use a lifeline, lanyard, and full body harness and have Task Specific Written Safe Work Procedures to prevent them from falling. Fall prevention and fall arresting devices must meet ANSI standards.

A fall prevention or protection system must be used wherever there is a fall hazard of 1.8 meters (5.9 feet) or more or where a fall from a lesser height presents an unusual hazard of injury. Acceptable methods of fall prevention/protection include the use of one or more of the following systems:

a) Guardrails
b) Personal Fall Protection Systems

c) Safety Nets
d) Control Zones
e) Safety Monitor System

A job-specific written fall protection plan is required where:

a) work is being done at a location where a fall hazard of 7.5 meters (25 feet) exists;
b) the safety monitor/control zone or other work procedures are being used as a means of fall protection.

11.4.8 Falsework and Formwork

a) Erection drawings and supplementary instructions for concrete formwork, falsework, and reshoring must be certified by a registered professional engineer and be available at the site during erection and use.
b) The following types of concrete formwork require engineer-certified erection drawings and supplementary information: forms; gang forms; self-elevating jump forms; vertical slip forms; formwork more than 4 meters (13 feet) in height; suspended forms for slabs, stairs, and landing; beam forms; jump forms; single sided forms over 2 meters (6.5 feet) in height; cantilever forms; bridge deck forms; shaft lining forms; and, forms so designated by the designer of the structure. Within 24 hours before concrete placement, the above-noted formwork and falsework must be inspected and a professional engineer must certify in writing that the specifications have been met.
c) Erection drawings and supplementary instruction information must include the plan and sectional views and connection details; the quality and grade of materials to be used for the components and their connection; an accurate description of proprietary items, including fittings; the load bearing capacity required of the material upon which the sills are to be placed; construction, erection, and dismantling procedures; details of supports necessary to maintain lateral stability and resist sideways and racking; the minimum dimensions of sills or other foundation members; connections detail of structural components; the restore plan where applicable; details of the form or mold into which concrete will be placed; load and deflection information; and, the requirement for outstanding field design and detailing where applicable.
d) A registered professional engineer must be responsible for all field designs, details, and changes including the effect they may have on the original design. Field designs and changes must be documented, signed off, and available at the site.

e) Employees working under formwork during concrete or other significant load placement must only be under those areas not subject to loading.
f) Placement of concrete or other loads must stop when any weakness, undue settlement, or distortion of the formwork occurs, and may restart only after the formwork has been repaired or strengthened under the instruction of a professional engineer.
g) No loads other than those specified must be placed on uncured concrete structures.
h) Protruding reinforcing rod ends must be guarded or removed to prevent tripping and/or impact hazards.

11.4.9 Guardrails

a) Guardrails shall be installed wherever there is a hazard of falling 2.8 meters (9.1 feet) or more from a temporary level.
b) Employees installing guardrails must be protected from falling.
c) Guardrails or other fall protection systems must be installed for work adjacent to or over water if a drowning hazard exists.
d) Permission to remove guardrails shall be obtained from the supervisor. When fall prevention devices are temporarily removed, other fall restraint or fall arrest devices shall be used to protect employees.
e) Guardrails and barricades that have been temporarily removed must be replaced at the earliest opportunity. Areas unguarded as a result of such removal shall not be left unattended.

11.4.10 Housekeeping

a) Work areas must be kept clean and free from obstructions at all times. Tools, waste, and other materials cluttering the site can be hazards.
b) Spilled toxic, flammable, or corrosive materials must be cleaned up immediately using the approved methods described in the appropriate Safety Data Sheet (SDS).
c) Materials, tools, and equipment must not impede access or egress routes. All materials must be stacked and secured to prevent sliding, falling, or collapsing.
d) During construction, form and scrap lumber or other debris must be kept clear from work areas, passageways, and stairs and in and around buildings. Protruding nails must be bent over or removed.
e) Debris and combustible scrap must be removed at regular intervals during construction. Containers must be provided for the collection and separation of waste, trash, oily and

used rags and other refuse. Garbage and other waste must be disposed of a frequent and regular intervals

11.4.11 Ladder Safety

a) Ladders must be inspected for defects prior to use. Ladders with broken rungs, split rails, and worn or broken safety feet, frayed or damaged hardware must be taken out of service.
b) The horizontal distance from the ladder base to the vertical plane of support shall be approximately ¼ of the ladder length between supports and the ladder shall be secured against movement both at the top and bottom. Ladder feet must be placed on a firm surface.
c) Working from the top two rungs or steps of a ladder is prohibited. When climbing, follow the three-point contact procedure. Do not reach out from a ladder more than an arm's length.
d) Ladders used for ascending or descending from one level to another must extend at least 1 meter (3 feet) above the upper landing except where there is restricted clearance and the ladder is adequately secured, hand holds must be provided at the top of a ladder.
e) Metal ladders or wires reinforced wooden ladders shall not be used in electrical substations or near energized electrical equipment
f) When using ladders in corridors, stairwells, or aisles, ensure that the ladder is secured to prevent it from being dislodged. Consider barricading the area or posting a safety watch.
g) Reroute pedestrian flow or post signs accordingly. Doorways must be blocked, locked, or guarded while ladders are used in front of them. Emergency exits must remain operational.
h) Employees on ladders shall use suitable hoisting equipment to lift or lower heavy or bulky items that do not carry loads while climbing a ladder.
i) When working on ladders at elevations over 3 meters (10 feet), personnel shall wear an approved full-body harness attached to a securely anchored lanyard.
j) When working at elevations over 7.5 meters (25 feet) above grade, a "Fall Protection Plan" shall be developed.

11.4.12 Mobile Equipment

Ground personnel shall ensure eye contact with the operator of the mobile equipment and wait for the operator's signal before moving into the working area of the mobile equipment.

a) Employees must not operate mobile equipment unless that person:
   - Has received adequate instruction and training in the safe use of that equipment;
   - Has demonstrated a qualified individual competency in operating the equipment;
   - Is familiar with the operating instructions of that equipment;
   - Has been authorized to operate the equipment.

b) All equipment operators shall inspect the equipment before the start of each shift. Records to this effect shall be maintained on the equipment. Any equipment defects or conditions that will affect the safe operation of the equipment must be reported to the operator's supervisor immediately. Unsafe conditions must be rectified before the equipment is put into service.

c) Maintenance records shall be kept for all services, repairs, or modifications which may affect the safe performance of the equipment. Maintenance records shall be kept on the equipment. Windshields, side and rear windows, and all mirrors must be maintained to provide clear vision at all times. All operators of vehicles and mobile equipment must possess the appropriate driver's license.

d) Operators of mobile equipment or vehicles are responsible for the safe operation of the equipment. They must maintain full control of the equipment and must comply with all laws and rules regarding the operation of the equipment.

e) When an operator has reason to believe that the equipment or the load is hazardous, the operator must report it to the supervisor and is not to move the equipment or load unless authorized to do so.

f) Operators must not leave the controls unless the equipment or vehicle has been secured against movement by setting parking brakes and transmission locks, lowering any blades, buckets, loads, or forks to the ground, and chocking wheels where necessary.

g) Mobile equipment used for lifting or hoisting must not be operated if the load exceeds the safe working load.

h) Where the equipment operator's vision is obstructed and the motion is in reverse, an audible warning device and area check are required, (see below).

i) All personnel, other than those individuals necessary to the task being performed shall remain well clear of loading, lifting, or hoisting operations.

j) The mobile equipment operator is the only worker allowed to ride the equipment unless seats or other safe facilities for other workers are provided and used. No person may be on any part of powered mobile equipment not intended for operator or passenger transport while the equipment is in motion.
k) Suspended loads must not be left unattended.
l) All vehicle and equipment operators shall use seat belts.

Backing Up (Reversing of Vehicles & Mobile Equipment)

a) It is recognized that the reversing of vehicles and equipment in work areas poses a serious problem to personnel on foot. Fatal accidents resulting from workers being backed over by dump trucks and other equipment occur all too frequently.
b) Anyone on foot in the vicinity of reversing vehicles and equipment is at risk.

Always check around your vehicle or piece of equipment for people in the blind spot before operating. Look before backing up. If needed, use a signal person.

General Safety Guidelines for Reversing Equipment:

Blind Spots

The main problem with reversing vehicles and equipment is the driver's or operator's restricted view. Around dump trucks and other heavy equipment such as front-end loaders, bulldozers, and graders there are blind spots where the operator has a very limited view or no view of the area behind the equipment.

Planning

Wherever possible, Department Managers and Site Superintendents will arrange for drive-through operations to reduce the need for equipment and vehicles to back up. Foot traffic should be minimized where trucks and equipment operate in congested areas such as excavations. Where feasible, use a barricade to separate excavation workers and access for workers on foot.

Signal Person or Spotter

Site Managers, Superintendents, and other individuals with supervisory responsibilities shall ensure a signal person or spotter is used when:

- A vehicle or equipment operator's view of the intended path of the travel is obstructed, or,

- A person could be endangered by the operation of the vehicle or equipment, or by its load.

Instruction

Department Managers and Supervisors are responsible for ensuring drivers, operators, signallers, and employees on foot are instructed in the hazards of reversing vehicles and equipment (blind spots) and precautions to be followed.

Instruction should focus on the following points:

Workers on Foot

a) Know how to work safely around trucks and operating equipment
b) Understand the effect of blind spots
c) Avoid entering or standing in blind spots
d) Make eye contact with the driver or operator before approaching the equipment
e) Signal the person's intentions to the driver or operator
f) When possible, use separate access rather than vehicle ramps to enter and exit the site
g) Avoid standing or talking near vehicle paths, grading operations, and other activities where heavy equipment is moving back and forth

Drivers and Operators

a) Always obey the signal person or spotter. If more than one person is signaling, stop your vehicle and determine which one to obey
b) If possible, remain in the cab in areas where other equipment is likely to be backed up
c) Make sure that all mirrors are intact, functional, and properly adjusted for the best view.
d) Sound the horn twice (2) before backing up.
e) When no spotter is present, get out and quickly walk around your vehicle. If the way is clear, back up at once.
f) Stop the vehicle when a spotter or anyone else disappears from view.

Signal Person or Spotter

a) Stay alert to recognize and deal with dangerous situations.
b) Know and use the standard signals for on-site traffic
c) Wear a high-visibility reflective vest or apparel and a bright hard hat for visibility.
d) Understanding the maneuvering limitations of vehicles and equipment.

e) Know driver and operator blind spots
f) Stand where you can see and be seen by the driver or operator
g) Make eye contact with the driver or operator before signaling or changing location

11.4.13 Pre-Stressing and Post Tensioning

Pre-stressing, post-tensioning, and de-tensioning operations must be done according to the specifications and instructions of a professional engineer and must be available on-site.

a) Employees not directly involved in the stressing operation are to keep well clear of the area.
b) Visual and/or audible warning signaling devices must be used in the tensioning area. During tensioning operations, the stressing area shall be barricaded and signs placed to prevent entry.
c) Flawed, worn, or damaged equipment must be removed from service immediately.
d) Jacks must be secured to anchorages before tendon tensioning and remain secured until after removal from the tendon.
e) Eye protection must be worn for grouting, stressing, and trimming operations.
f) Personnel are to be protected from hazards while tendons are being cut.

11.4.14 Rigging and Hoisting

This procedure applies to all rigging equipment, including wire rope and slings, chains, synthetic (polyester / Kevlar/nylon) slings, lever hoists (come-along), chain falls, shackles, hooks, lifting / spreader bars, clamps, and any other load bearing hoisting attachment.

a) Rigging and slinging work may only be done by or under the supervision of, qualified and authorized persons. An individual shall be designated as a Lift Supervisor and shall control all aspects of the lift.
b) The crane operator shall only take direction from one designated and qualified individual (typically a rigger). The rigger must be familiar with and examine the lifting hardware and slings and ensure it is load-rated to match the load weight. The safe working load rating identified for all shackles, slings, and related hardware shall never be exceeded.
c) Yellow caution tape or signage shall be installed around the perimeter of the lift area.
d) The weight of the load must be determined to select the proper ropes, chains, slings, and fittings. The load imposed on the lifting materials must not exceed the manufacturer's recommended safe working load.

e) A Registered Professional Engineer shall determine safe working loads if a manufacturer's specification is not available.
f) Tag lines shall be used when handling all hoisted loads.
g) Slings shall be used, handled, and stored in a manner that ensures they will not be damaged.
h) The Lift Supervisor shall not work, stand, or allow others to stand or pass under any suspended loads.
i) Suspended loads must not be left unattended.
j) Employees, except in emergencies, are not permitted to ride the load or the hook.
k) Rigging equipment shall be inspected by journeymen experienced in rigging a minimum of once per month, but more frequently (weekly or even daily) if used continuously.
l) Damaged rigging equipment will be removed from service and destroyed. An inspection log will be maintained for all rigging equipment. The manufacturer's recommendations regarding criteria that necessitate repair or replacement will be followed.
m) Sharp edges of loads will be protected with wood softeners or other soft materials to protect the slings.
n) Wire ropes and slings shall be inspected for corrosion, kinks, abrasion, electric arcing, metal fatigue, bird caging, diameter reduction, and broken strands. Synthetic slings shall be inspected for evidence of exposure to heat, cuts, or frays, or if there are indications of wear (internal or external).

11.4.15 Scaffolding

a) Scaffolds may only be erected and dismantled by or under the direction of, qualified persons.
b) Scaffolds with work platforms 2.8m (9.1 feet) or more above grade must have guardrails, intermediate rails, and toe boards installed.
c) Do not climb cross braces. Access to scaffold levels up to 9 meters (30 feet) above grade must be made via end frames with a ladder-type design, a fixed vertical ladder, a portable ladder, or a stairway. Access to scaffold levels above 9 meters (30 feet) must be made via a fixed vertical ladder.
d) Freestanding scaffolding must be restrained from tipping when the height exceeds 3 times the minimum base dimension. Where outriggers are fitted to increase the base dimension, they must be installed on both sides of the scaffold structure.
e) Do not use ladders or other devices on top of scaffolds to increase the working height.

f) The wheels of rolling tower scaffolds must be locked when workers are required to work at heights in excess of 2.8m (9.1 feet). No worker is to remain on a rolling tower scaffold while it is being moved if the scaffold height exceeds twice its minimum base dimension.
g) Inspect all parts of the scaffold before and regularly during use.
h) Never exceed the scaffold's load capacity.
i) Scaffold planks are to be secured against dislodgement. Where a work platform has an opening larger than 10 inches, another scaffold plank shall be installed.

11.4.16 Energy Isolation

Prior to any maintenance or repair of equipment for facility structures Tembo Nickel shall prepare and implement a Written Energy Isolation Program that includes the following to ensure that the control devices are locked in the inoperative position when machinery or equipment is shut down for maintenance or repairs and when the nature of the work may expose an employee to a potential hazard from inadvertent equipment start-up:

a) Training in responsibility for energy isolation
b) Procedure and sequence for isolation of all energy source
c) Verification of isolation
d) Authorized removal of isolation devices and locks
e) Return to service

Any contractor required to conduct Energy Isolation will provide Tembo Nickel with a written plan that meets or exceeds Tembo Nickel's Energy Isolation Program requirements.

11.4.17 Confined Space

It is the policy of TNCL that entry into a confined space shall be restricted to permit-only access. Confined spaces shall be identified and employees shall not enter unless trained, authorized, and have the approved Confined Space Permit in place. Some examples of confined spaces on the Tembo Nickel Project include:

a) Ulverts,
b) Manholes,
c) Excavations
d) Septic Tanks,

Entry into and work in a confined space poses considerable health and safety risks. Concerns in a confined space are the presence or possible build-up of a hazardous atmosphere within the

confined space. This could take the form of an explosive/toxic atmosphere or a lack of oxygen. Work intended to be done within a confined space must be carefully defined and planned ahead of the actual entry taking place so that all possible hazards are identified and preventative action taken. To accomplish this a Hazard Analysis must be carried out by a trained and qualified individual to determine the specific job needs.

Before any Confined Space Entry, Tembo Nickel shall prepare and implement a Written Confined Space Entry Program that includes the following:

a) The assignment of responsibilities;
b) Identification of each confined space;
c) Written Safe Work Procedures for entry into and work in the confined space that addresses
d) An Assessment of the Hazards including a Job Safety Analysis;
    - Lockout and isolation
    - Verification and testing
    - Cleaning purging and venting
    - Ventilation,
    - Sand-by monitors
    - Rescue
    - Lifelines, harnesses, and lifting equipment,
    - Personal protective requirements,
    - Provision for a documented Confined Space Pre-Entry Meeting
    - Coordination of work activities.

Any contractor required to enter a Confined Space will provide Tembo Nickel with a written plan that meets or exceeds Tembo Nickel's Confined Space Entry Program requirements.

12. PROJECT-SPECIFIC HEALTH AND SAFETY INITIATIVES

12.1 Harrassement free

12.1.1 Introduction

Implementation of anti-harassment policies and practices, not only minimizes the risk of violation and liability but also carries out our responsibility of complying with law. The ultimate goal is to achieve a common culture, which has zero tolerance for harassment. The TNCL Project values the uniqueness of individuals and the various perspectives they provide. The project promotes

diversity within our workforce and the inclusion of an environment that enables each of us to fully participate and contribute to the successful completion of the project.

12.1.2 Policy

It is the policy of TNCL that all personnel working on the Tembo Nickel Project are entitled to work in an environment free of any conduct that may be considered to be harassing, abusive, humiliating, disorderly, or disruptive. Harassment may also relate to discrimination based on age, physical or mental disability, national or ethnic origin, race, religion, sex, sexual orientation, political belief, marital or family status, or other basis protected by law.

12.1.3 Scope

The term harassment refers to any unwelcome physical, verbal, or sexual behavior, either explicit or implicit, that by its nature has the effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. The following, depending on the facts and circumstances, are examples of visual or physical actions that can create a hostile work environment - they are not intended to be a complete list of objectionable behaviors:

a) Visual conduct such as leering, making sexual gestures, displaying, sorting, copying, or transmitting objectionable objects, pictures, cartoons, computer screen images, calendars, posters, or written or graphic items at project facilities or on project-associated equipment.
b) Verbal conduct, such as unwanted advances, looks, threats, offensive jokes, name-calling, derogatory, suggestive, or unwanted comments, or statements about an individual's body or requests for sexual favors.
c) Physical conduct, such as assault, blocking normal movement, restraint, touching, or other unwanted physical contact directed at an individual.

While every offensive joke or comment may not amount to harassment, it crosses the line if it is unwelcome. The best practice is to not engage in this type of behavior.

12.1.4 Responsibility

Policies and procedures for effectively resolving incidents of harassment or discriminatory conduct shall be developed by TNCL. All participants working on the project shall be informed of the harassment policy and the procedures to deal with a complaint.

It is the responsibility of TNCL management personnel to take immediate and appropriate action to report or deal with incidents of harassment when brought to their attention. Under no circumstances should a complaint be dismissed or downplayed by the complainant or be told to deal with it him or herself.

12.1.5 What Can You Do?

If an individual feels that they have been subjected to harassment, typically they should tell the harasser that his or her behavior is inappropriate and unwanted and you want it to stop. In many instances, a direct but simple conversation will end the situation.

In some instances, it may be inappropriate to confront the harasser. If this happens one should contact their supervisor. Retaliation for filing a complaint will not be tolerated. If the individual is not satisfied with the resolution they may contact the TNCL Human Resources Department.

Tembo Nickel shall investigate complaints promptly and effectively. Individuals at all levels working on the project are expected to cooperate in an investigation. To the extent practical, investigations should be kept in confidence among the individuals who need to be informed in order to complete the investigation and resolve the issue.

If an investigation finds that an individual has engaged in prohibited harassment, appropriate corrective action should be taken.

12.2 Disciplinary / Enforcement Policy

12.2.1 General

The key purpose of the Health and Safety Management Plan is to ensure that a safe and healthy work environment is provided for project participants and that employees receive health and safety orientation and training regarding project rules, safe work practices and procedures, and statutory requirements. The Tembo Nickel Project will implement a system for consistently enforcing the safety program.

TNCL will not tolerate violations of health, safety, fire safety, or environmental requirements and /or individual behavior that constitutes a risk to anyone's health or safety while on project

construction sites. Individuals who do not meet this policy may be subject to disciplinary action, up to and including, immediate termination of employment.

A Discipline/ Enforcement Policy and Program shall be based on the following criteria:

a) At the time the unsafe act or breach of safety legislation is committed /observed; the supervisor is to consult with the employee(s) involved to determine if the employee(s) is aware of the safety legislation/project policy or procedure that has been contravened. Care will be taken to determine the cause or reason for such unacceptable behavior. Retraining may be considered.
b) Supervisors shall enforce the unsafe or unacceptable behavior consistent with the Project's Discipline/Enforcement Policy
c) Written documentation shall be maintained of all disciplinary actions.

12.2.2 Discipline Policy

First Notification: Before issuing the First Offence, the supervisor should ensure that the employee is aware of the safe work practice or procedure that was being contravened. The first notification shall be verbal. The employee shall be advised of the contravention and encouraged to ensure that they do not disregard safety requirements in the future.

Second Offence: In the event that an employee conducts an unsafe act or has a disregard toward any safety requirement or safe work procedure, the supervisor shall meet with the employee and review the significance of the contravention. A written warning shall be issued to the employee.

Third Offence: In the event that the employee conducts an unsafe act or procedure a third time TNCL shall advise the employee that they shall be removed from the construction project. Written documentation shall be maintained.

13. WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM (WHMIS)

13.1 General requirements

WHMIS legislation is an international program designed to provide workers with information regarding the hazards of hazardous products that are handled, stored, used, or disposed of in the workplace.

All Tembo Nickel Project personnel including contractor personnel shall ensure that all Workplace Hazardous Material Information System (WHMIS) controlled products controlled materials are stored, transported, labeled, handled, used, and disposed of in a manner that complies with applicable legislation.

Controlled materials handled or transported by a contractor or subcontractor must be identified and supplied with the appropriate documentation, labeling, placards, and safety markings. Tembo Nickel shall ensure that all employees involved in the handling or transportation of controlled materials have received training and possess a current certificate.

All health and safety information regarding hazardous materials stored, transported, handled, or used by Tembo Nickel must be readily available to all affected employees. Employees shall not handle hazardous products if they have not received WHMIS training or have not been made aware of the potential hazards and safe work practices that will protect the employee.

13.2 Responsibility

Before working with hazardous products each employee shall:

a) Receive training in Working with Hazardous Materials (WHM),
b) Be provided with information on the hazards of the product. Know and understand the information required on labels, its significance, and the procedures for the safe use of a product before using it,
c) Report containers that are unlabelled, illegibly labeled, or inadequately labeled,
d) Be provided with adequate training in safe work practices and follow established procedures described in the Safety Data Sheet (SDS) for the safe use, storage, and handling of hazardous materials,
e) Be knowledgeable of the emergency measures to be taken in the event of an emergency, including spills, fire contact, etc.,
f) Be given access and training in the use of the required personal protective equipment,
g) Clean up and dispose of harmful substances using the method described in the SDS, and,
h) Understand their responsibility to comply with WHMIS requirements.

Supervisors have additional responsibilities:

a) Ensure that all employees under their direction and control have received WHMIS training and have access to current Safety Data Sheets,
b) Ensure that all new and used hazardous chemicals are logged into the “Hazardous Material Inventory.”
c) Ensure that employees have received training in the safe work practices of the hazardous material being used, and,
d) Ensure that adequate personal protective equipment is provided and that employees are fully trained in the proper use of the equipment.

13.3 Hazard Classfication

- The six classes of controlled products are:
- Class A Compressed Gas
- Class B Flammable and Combustible Material
- Class C Oxidizing Materials
- Class D Poisonous and Infectious Materials
- Class E Corrosive Materials
- Class F Dangerously Reactive materials

13.4. Labelling

WHMIS labels identify the risk(s) and recommend precautions that should be taken for the safe handling of hazardous products.

Supplier labels must be affixed on the controlled product when it enters the workplace. These labels provide detailed information relating to the product.

Workplace labels display product identification, precautions, and reference to a material safety data sheet. They must be applied by the worker when decanting a controlled product into a new container.

13.5 Safety Data Sheet

Safety data sheets contain all available information on the hazards and the safe handling characteristics of the controlled product. This information includes:

- Product Information
- Hazardous Ingredients
- Physical Data

- Fire and Explosion Hazards
- Reactivity Data
- Toxicological Information
- Preventative Measures
- First Aid Measures
- Preparation Date of the SDS

13.6 Education and Training

Employees should be able to answer the following questions:

a) What are the hazards of the controlled product?
b) How are you protected from those hazards?
c) What do you do in the event of an emergency?
d) Where do you get further information?

Tembo Nickel personnel shall have WHMIS training prior to accessing the construction site. Employees requiring training are to contact their supervisor.

WHMIS training records are to be maintained for review. Supervisory personnel shall ensure that workers have received workplace-specific training and that the work is undertaken without undue risk.

13.7 Disposal of Hazardous Substances

Hazardous substances must be disposed of using the method described by the Safety Data Sheet (SDS) for that substance or as required by the provincial authority having jurisdiction.

14. FIRE PROTECTION AND PREVENTION

14.1 General

Attempt to fight fires only if you have received training and you are not putting yourself at risk of injury. Tembo Nickel is responsible for ensuring applicable regulations concerning fire prevention and control are strictly followed and that appropriate fire prevention and fire-fighting supplies and equipment are provided in keeping with the work being performed and the fire hazards in the vicinity.

All employees assigned to firefighting duties must be trained in firefighting procedures. If a fire occurs, only attempt to extinguish it, if you are not putting yourself at risk. If necessary, summon the assistance of fellow workers. If there is any indication that the fire will not be able to be extinguished easily, then an alarm must be raised immediately and evacuation procedures implemented.

Employees shall know the locations of fire-fighting equipment in their work locations and ensure that access to all fire-fighting equipment is maintained at all times. Fire equipment must always be kept accessible and in good working condition. Tampering with fire protection equipment will not be tolerated. Any persons found tampering with fire protection equipment will be immediately discharged from the project and reported to the police.

Smoking is permitted only in designated smoking areas.

14.2 Fire Safety Requirements

Smoking and open flames shall be prohibited in all areas, except where allowed in areas that are posted as a “SMOKING AREA” or where operating under a “Safe Work Permit” or “Hot Work Permit”. All exits and fire egress routes shall remain unobstructed at all times. Unnecessary combustible material shall be removed from storage areas.

When storing materials, consideration shall be given to ensuring that adequate clearance is provided around lights and heating equipment.

Tembo Nickel shall ensure that all mobile equipment, including company vehicles are equipped with approved fire extinguishers. All fire extinguishers will be kept in serviceable condition tagged and will be inspected monthly. An inspection log shall be kept on file. An Incident Report shall be completed for each fire situation or any time a fire extinguisher is discharged.

14.3 Classes of Fire Extinguisher

Employees must know the locations and types of fire extinguishers in their work area(s). There are four classes of fires, and each requires a particular type of extinguishing agent. Portable fire extinguishers are labeled as to the types or classes of fires on which they should be used.

CLASS “A” FIRES occur in normal combustible materials such as rags, paper, wood, and trash.

CLASS "B" FIRES combustible/flammable liquids such as gasoline, oil, grease, paints, and thinners.

CLASS "C" FIRES are electrical fires, or fires occurring in or near electrical equipment, thereby presenting the additional hazard of electrical shock.

CLASS "D" FIRES involve combustible metals such as sodium and magnesium.

NOTE: ABC fire extinguishers will handle all construction-related fires

14.4 Required Location For Fire Extinguishers

a) All office and buildings and trailers.
b) Provide at least one extinguisher per 232 m2 (2000 sq. ft) of floor area on each floor.
c) In all stores buildings, storage trailers, and tool cribs.
d) Provide at least one extinguisher per 116 m2 (1000 sq. ft) of floor area on each floor.
e) All construction vehicles (including ½ ton trucks) cranes, welding machines, and any equipment that has an internal combustion engine.
f) Provide at least one extinguisher per vehicle or unit.
g) At all fuel and flammables dispensing stations and storage locations.
h) Provide at least one extinguisher per 58 m2 (500 sq. ft) of floor area.
i) Within 5 meters of sources of ignition such as welding or cutting.
j) Provide at least one extinguisher per unit.

The above requirements are the minimum. The actual quantity of extinguishers required is based on the character of the fire anticipated and uniqueness of the area and the units of extinguishing potential to protect the particular area.

14.5 'Hot Work' Permits

A "Hot Work" Permitting system has been developed to allow work that may create a source of ignition within a restricted area. Where "HOT WORK" is being performed, TNCL shall ensure the appropriate number of fire extinguishers to effectively control a potential fire. Posting a "fire watch" shall also be considered.

15. SECURITY

15.1 General

The safety and security of the public at the Tembo Nickel Project is of paramount importance. Tembo Nickel shall ensure that the site is secured against trespassing and that the general public is otherwise protected from inadvertent harm during the contract.

15.2 Site Perimeter Security

Tembo Nickel shall ensure the erection and maintenance of site perimeter fencing or hoarding to secure work areas. All available means including fencing, barricades, hoarding, signs, signals, and effective lighting to secure the site. Perimeter fencing shall be a minimum of not less than 8 feet high. Where possible, effective signage shall be prominently displayed on all perimeter fencing indicating “Authorized Personnel Only” and “Keep Out.” Where electrical hazards exist, appropriate electrical hazard signage shall be displayed.

15.3 Property Removal

Property belonging to Tembo Nickel shall not be removed from the site without prior approval from the Site Manager or designate.

15.4 Security Manual

TNCL is committed to establishing and maintaining a high level of security at Tembo Nickel to protect the general public, contractors and subcontractors, project participants, and company property. A Security Execution Plan will be implemented.

16. RECORD AND PROGRAM REVIEW

16.1 Record and Maintenance

TNCL, consultants, contractors, and subcontractors, shall maintain detailed records and statistics relating to health and safety, security, and emergency preparedness and response in accordance with due diligence requirements and to assist in monitoring the effectiveness of the Project’s Health and Safety Program.

Records and statistics will be retained for all of the Project Health and Safety Program elements that require them for at least the duration specified.

16.2 Record Retention Duration

The following shall be used as a guideline for record retention duration:

16.2.1 Ten Years Retention

a) Contractor Pre-Construction Safety Meeting Records
b) Daily Pre-Task Safety Meeting Records
c) Weekly Tool Box Meeting Records
d) Joint Health and Safety Committee Minutes and Inspection Reports
e) Task-Specific Safety Meetings
f) Emergency Preparedness and Mine Rescue Reports
g) Informal Inspection Reports
h) Planned Inspection Reports
i) Job Hazard Analysis Reports and Safe Work Practices

16.2.2 Twenty Years Retention

a) First Aid Reports
b) First Aid Treatment Records
c) Incident and Accident Investigations
d) Property Damage Investigations
e) Records of Emergencies

16.2.3 Permanent Retention

a) Worker Orientation Records
b) Worker Safe Work Procedures Training
c) First Aid Training and Certification Records
d) Medical Surveillance Records.
e) Records of Worker Safety Violations
f) Records Resulting from Worker's Refusal to Work

16.2.4 Miscellaneous

Equipment Records - Life of the equipment plus 5 years (typically stays with the equipment).

17. SYSTEM EVALUATION

This procedure shall be reviewed at least two years by members of the OHS department and presented to the Standard Committee for approval, or when organizational changes take place or are required as part of internal and external audits. The TNCL Document Controller will monitor compliance with the document control system on an ongoing basis.

18. DISTRIBUTION

List physical locations that require a controlled copy of this document.

Copy	Controlled Document Folder Location
Master	Controlled Documents Central Filing System

19. CONTRAVENTION

Any breach of this plan shall be regarded as refusal/failure to carry out a lawful instruction and will be dealt with as per the disciplinary procedure.

20. DOCUMENT CHANGE PROCESS

The process of document change starts when the document custodian identifies there is a need to make changes within the document. The document custodian/ owner shall complete the document change request form, sign it off, and submit it to the Document Controller.

The Document controller shall issue the controlled word copy of the document to the respective document custodian/owner so that changes may be made. The document custodian/owner shall resubmit the updated document to the document controller so that the document can be controlled and updated within the Filing system ready for use by the end users.

20.1 Reason for Change

A	As a result of incidents	F	Change in training requirements
B	As a result of the audit findings	G	Results of risk assessments
C	New / changes in governance documents	H	Change due to spelling or grammatical error
D	Changes in legislation	I	New document format
E	Changes in technology	J	To integrate special instruction into the document control system

20.2 History of Change

Date of Change	Revision No	Revised Item (paragraph Number reference if required)	Reason Code	Name of Reviewer

21. RECORD CONTROL

Document Title:	Document ID:	Responsible for Maintenance	Responsible for Filling	Location of Storage	Retention Period	Method of Disposal
TNCL Project OHS Plan	TNCL-OHS-PLN-0007	Document Controller	Document Controller	OHS Department	Hard Copy two Years	Hard copy shared file electronic

22. DECLARATION

I hereby declare that I have taken part in the discussion of this procedure, and I understand its contents and do commit that I shall ensure compliance hereto:

Table: 6

	Name and Surname	Company Number	Designation / Role	Signature	Date Signed
1.					
2.					
3.					
4.					
5.					
6.					
7.					
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19.					

23. Appendix 1: TNCL Health and Safety Policy Statement

TEMBO NICKEL	STANDARD FORM	Document ID	TNCL-OHS-FRM-0001
		Document owner	OHS Manager
	OCCUPATIONAL HEALTH AND SAFETY POLICY	Revision	02, Next review, 2026
		Approve Date	August 2023

OCCUPATIONAL HEALTH AND SAFETY POLICY

Tembo Nickel Company Limited (TNCL) is committed to providing safe and healthy working conditions for the prevention of work-related injury and ill health and its appropriate purpose, size, and context of the organization and to the specific nature of its occupational health and safety risks. Tembo Nickel strives to operate in a safe workplace that is injury and fatality-free and to enhance the well-being of our employees and contractors. Tembo Nickel values are based on SAFETY, RESPECT, HONEST, and INTEGRITY.

To achieve this Tembo Nickel will:

- Provide visible safety leadership, and appropriate leadership development and training at every level in the organization.
- Identify all hazards and assess the risks, conduct an ongoing risk assessment for activities undertaken by the project, and set priority objectives for elimination and reduction of risk.
- Establish and maintain an Occupational Health and Safety Management System that satisfies the requirements of ISO 45001:2018, all applicable statutory and regulatory requirements, industry best practices, and any other client-specific requirements.
- Foster a positive health and safety culture conducive to the reporting of unsafe acts and conditions so that we may identify and address those conditions before injuries occur.
- Ensure TNCL staff, Suppliers, Visitors, and other stakeholders have the opportunity to participate and consult in the occupational health and safety activities.
- Empower our employees to demonstrate their commitment to safety daily through their actions and involvement in their work and the company safety programs and initiatives, and in strict adherence to rules, regulations, and procedures.
- Promote awareness by communicating this policy to all internal and external interested parties to be aware of their obligations and responsibilities and encourage them to contribute to the TNCL health and safety program.
- Ensure occupational health and safety performance objectives are set, monitored, reviewed, and measured results at regular intervals.
- Report all incidents and accidents as required and thoroughly investigate and analyze them to prevent recurrences of similar causes.
- Maintain continual improvement of Occupational Health and Safety Management and performance by regularly monitoring and reviewing the Occupational Health and Safety Management System to ensure its effectiveness.

In implementing this Policy, we will engage with and support our employees, contractors, suppliers, visitors, business partners, and local communities in sharing responsibility for meeting our requirements and upholding our Tembo Nickel values.

Benedict Busunzu
CEO - Tembo Nickel.

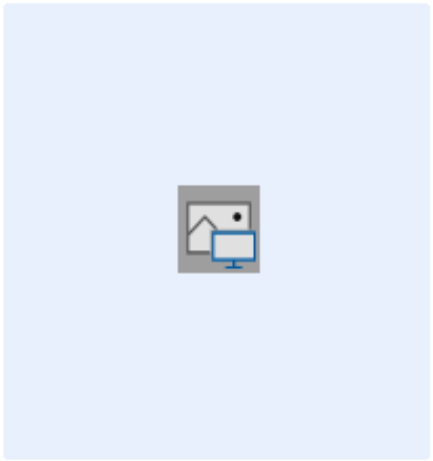
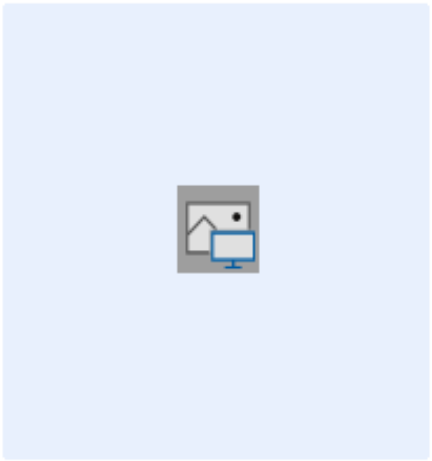
24. Appendix 2: Incident / Accident Notification

This report is intended to provide initial notification that an incident or high-potential event has occurred.
Flash Report shall be shared within 24 hours

INCIDENT DETAIL			
Company		Department	
Section		Location	
Incident classification/	Choose an item.	HPI	Choose an item.
Incident date	Sunday, November 3, 2019	Incident time	

INCIDENT DESCRIPTION (Brief description of what happened)

IMMEDIATE ACTION TAKEN (Brief description of the action taken)

PHOTO (S)	
	

REPORTED BY	

25. Appendix 3: Incident Report Form

TEMBO NICKEL	STANDARD FORM	Document ID	TNCL-OHS-FRM-0008
		Document owner	OHS Manager
	INCIDENT REPORTING FORM	Revision	05
		Approve Date	22nd June 2024

Reporting: This page must be submitted to OHS Manager within 24 Hrs.	Report Number: TNCL: External Notification ☐ Yes ☐ No If yes. Explain in "Immediate Actions"

PART A	INCIDENT DETAILS			
	Injury	Property Damage/ Production Loss / Near Miss		Incident Category
Type	☐ FAC ☐ MTI ☐ LTI ☐ Fatality ☐ RDI	☐ Equipment/Property ☐ Loss to Production ☐ Environmental Impact ☐ Community ☐ Near Miss	☐ Hazard	☐ Health ☐ Safety ☐ Environmental ☐ Community
	Type of Incident: ☐ Fall of Ground ☐ Material Handling ☐ Falling material ☐ Explosive ☐ Chemicals ☐ Machinery ☐ Light Vehicle ☐ Slip/Trip Fall ☐ Fire ☐ Heavy Vehicle ☐ Tools/Equipment ☐ Gassing ☐ Other Specify): _____			
Injured	Name:	☐ Employee ☐ Contractor	Current Status:	
Occurred	Date :	Time (24-hour clock):	Reported by:	
Reported	Date :	Time (24-hour clock):		
Location				

Description of the incident (i.e., where it happened, when it happened, who was involved, what activity was occurring at the time, what happened)	
Consequences (e.g., extent of injuries or damage to equipment or impact on the environment or extent of media attention)	
Immediate Actions after the Incident	

26. Appendix 4: Non-Conformity and Corrective Action Request

NON-CONFORMITY AND CORRECTIVE ACTION REPORT

PART 1: NON-CONFORMITY

Type	Select corrective action type			
	Corrective action for existing issue		Corrective action for a potential Issue	
	Opportunity for improvement		Other suggestion	

Priority	Set priority for response level			
	Low (Response as and when available)		Medium (Response as soon as possible)	
	High (Response by deadline)		Urgent (Response immediately)	

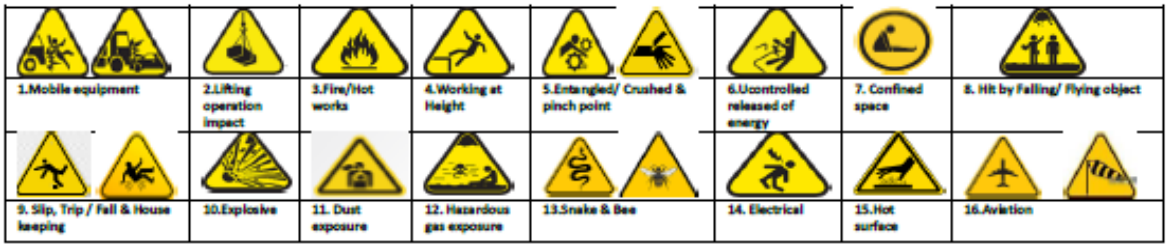
DESCRIPTION OF NONCONFORMITY:		
RAISED DUE TO	**√**	**RECOMMENDED ACTION**
Internal audit findings		
Third-party audit findings		
Complaints (internal or External)		
Observations and inspections		
Other relevant internal inspections		
In-process concerns		
Concerns about OHSMS stability		
H&S incidents or near misses		
Potential or actual breaches of compliance		
If other, please describe the opposite:		

Procedure Reference			
Responsible Person for NC (name)		Resp. Person Signature	
NC Raised by (Name)		Date & Signature	

27. Appendix 5: Field Level Risk Assessment

Date:		**Start time:**	**Date:**
Shift:		**Work Location:**	**Shift:**
Team Leader Name:		**Company:**	

S	T	G
Simama/Stop	**Tafakari/Think**	**Endelea/Go**
Before you do a job, stand back for a few minutes	If you continue, can anything injure you or cause loss or cause you not to perform your job well?	You have now thought about what must be done
What do you have to do, and do you have a plan/procedure place?	Take time to think about a safe way of doing the Job	You have Identified the dangers to your safety and others
Has anything changed in your workplace?	Discuss with fellow workers and decide on a safe way to do the job.	You now have the right tools, PPE, and team support
Is it new equipment or a new working environment?	Do you need to get the correct tools and/or PPE?	You have Identified the safe action
Are you trained to do the job?	Do you need to get extra help, support or assistance from your line manager or team?	
Do you have the correct tools to do the job safely and on time?		
Do you have the correct PPE?		
Do the Job! Continuously check your area and have a safe productive day!		



Hazards and Risk control at workplace				
#	Task	Identify The hazard & Critical risk	Control the hazard	Supervisor comment
IF THE YOU CAN NOT CONTROL THE HAZARD/RISK STOP THE WORK INFORM YOUR SUPERVISOR				

28. Appendix 6: Emergency Callout Flow Chart