Effective Date: Feb. 25, 2021 Revision Date: Feb. 25, 2021

Incident Investigation Policy

The Senior Management of Grascan Construction Ltd. is vitally interested in the Health and Safety of its workers. Protection of workers from injury or occupational disease is a primary objective of the company.

Senior Management of Grascan Construction Ltd. will make every effort to provide a safe, healthy work environment for all workers, supervisors, visitors and the public. To be effective, all stakeholders share an equal responsibility in reporting hazards and complying with the legislative requirements outlined in the Occupational Health & Safety Act (OHSA) and Grascan's Incident Investigation Program GCL-POL-008.

This Policy will ensure the incident investigation and reporting requirements under the Occupational Health & Safety Act are met, including the requirements for notices under Sections 51, 52 and 53. All members on a Grascan project are required to follow the investigation process including, reporting accident / incident / illness, near misses and to complete the required forms and investigate the cause. Additionally, all workplaces must have the required procedures in place in order to minimize hazards. Grascan recognizes that Incident Investigation and Reports by themselves do not completely eliminate hazards however it does reduce the risk by acting quickly in an emergency situation.

Supervisors will be held accountable for the Health & Safety of workers under their supervision and will provide as required the appropriate procedures to their workforce.

Every worker must protect their own Health and Safety by working in compliance with legislation and the company rules including those surrounding accident investigation and reporting.

Senior Management of Grascan Construction Ltd. is dedicated to providing a safe and healthy work environment to its workers and believes that proper training and communication will achieve this goal. Additionally, this program will be reviewed annually to ensure it complies with legislative requirements and the Health & Safety of the workforce.

Benjamin Day,

Environmental Health & Safety Manager,

NCSO

February 25, 2021

Date