



EE-HSE-201 Environmental Policy for all departments

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Policy Owner: Vice President People & Culture and Corporate Services

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Revision History

Policy Issue Date	List of Changes or Reason for Issue	Policy Version #
13-Sept-2023	Original issue.	Version 1

Review Schedule

Every 2 years.

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1.0 Introduction

1.1 Purpose

Elexicon Energy Inc. (“Elexicon”) is in the business of delivering electricity to ten different municipalities in Ontario. Beyond the provision of safe and dependable energy, Elexicon takes pride in proactively working towards a better tomorrow.

To this end, Elexicon and the Board of Directors is committed to operating in an environmentally responsible manner by respecting environmental legislation, regulations, governmental guidelines and, pollution prevention principles and protecting the environment in order to contribute to sustainable development.

Therefore, this Policy outlines Elexicon’s environmental commitments and the responsibilities of all parties in ensuring that these commitments are achieved within the defined scope of its environmental management program system.

1.2 Related Policies

- AD05-EC Environmental Policy

2.0 Roles and Responsibilities

2.1 Employer:

- Facilitate the development of an environmental management system (EMS) which conforms to the requirements of ISO 14001:2015 to manage environmental aspects (hazards) and impacts (risks) associated with Elexicon’s activities.
- Ensure the availability of resources (human resources and specialized skills, organizational infrastructure, technology, and financial resources) to implement, maintain and improve the EMS.
- Foster an environmentally responsible workplace.
- Review environmental policies and procedures for compliance and suitability, and revise where necessary.
- Review the EMS on an annual basis to ensure its continuing suitability, adequacy, and effectiveness.
- Provide all relevant parties with a copy of all orders or reports issued to the employer by the Minister of Environment, Conservation and Parks (“MECP”) and to inform the committee of any work-related environmental incidents.

2.2 Managers and Supervisors:

- Assist with the development, implementation, and enforcement of environmental policies and procedures.
- Continually promote environmental awareness through the provision of information, training, and supervision.
- Participate in the environmental risk assessment process to identify environmental aspects(hazards) and impacts (risks) and the measures to control these.
- Participate in environmental incident investigation and identification of corrective actions.

- Perform inspections of the workplace to identify and control environmental impacts.
- Ensure that pollution prevention equipment is maintained.

2.3 Health, Safety and Environment:

- Maintain up-to-date knowledge of applicable environmental regulations as mandated locally, provincially, or federally.
- Consult with government agencies to ensure environmental compliance.
- Advise management on relevant environmental issues.
- Develop policies, procedures and strategies that support a strong environmental management program which conforms to the requirements of ISO 14001:2015.
- Facilitate the environmental risk assessment process to identify environmental aspects (hazards) and impacts (risks) and the measures to control these.
- Coordinate environmental inspections and audits and follow up to ensure compliance.
- Raise environmental awareness throughout Elexicon through training and communication.
- Evaluate current environmental strategies, objectives and action plans and adjust them accordingly to meet the goal of continual improvement and compliance.
- Participate in environmental incident investigations and assist with identifying corrective actions.
- Review environmental monitoring data and incident trends to identify problem areas and solutions.
- Monitor the effectiveness of the EMS and assist with the implementation of improvements.
- Review and revise the Environmental Policy every two years.

2.4 Employees:

- Comply with Elexicon environmental policies and procedures.
- Complete required environmental training.
- Perform duties in a manner that protects the environment and prevents pollution.
- Report any environmental incident to their immediate supervisor or any company management representatives, so the issue may be investigated, and corrective action applied as soon as reasonably possible.
- Complete an annual attestation.

2.5 Contractors and their employees, temporary and/or contract workers, and visitors:

- Comply with the requirements of Elexicon's EMS.
- Report any environmental incidents to an Elexicon management representative.

2.6 Joint Health and Safety Committee ("JHSC") Members and Health and Safety Representatives:

- Commit to environmental protection and pollution prevention in the workplace.
- Stimulate and raise awareness of environmental issues in the workplace.

- Participate in the environmental risk assessment process to identify environmental aspects (hazards) and impacts (risks) and the measures to control these.
- Conduct regular workplace inspections and make written recommendations.
- Listen to employee complaints, concerns, and suggestions.
- Participate in environmental incident investigations.
- Promote and monitor compliance with environmental regulations.

3.0 Environmental Policy Commitments

To meet Elexicon's goal of proactively working towards a better tomorrow, Elexicon will:

- Implement an environmental management system that facilitates the ongoing identification, assessment and effective management of environmental aspects and impacts related to its electricity distribution operations.
- Meet environmental requirements defined by legislation, regulations, governmental guidelines, and other standards that apply to Elexicon.
- Support our customers energy efficiency awareness and choices.
- Protect the environment through the management of its identified significant environmental aspects, including prevention of pollution with respect to managing potential transformer hydrocarbon spillages and waste management.
- Conserve natural resources and strive towards the goal of Net Zero emissions by 2050 or sooner.
- Continually improve Elexicon's environmental performance through regular reviews, inspections, audits and setting of objectives and action plans.
- Report, investigate and learn from environmental incidents by determining contributing factors and implementing corrective actions to ensure the effectiveness of controls.
- Provide adequate resources to successfully implement and maintain the environmental management system.
- Provide necessary environmental communication and training to employees and contractors to ensure competence and compliance to the requirements of the environmental management system.
- Publicly communicate its environmental performance through the Corporate Environmental, Social and Governance Report.

These policy commitments are available to all interested parties and will be reviewed every two years to ensure that they remain relevant to Elexicon's operations and the needs of its Interested Parties.

Appendix A: Terms and Definitions

Below is a list of definitions in alphabetical order used in this policy:

Environmental Aspect: An environmental aspect is an element of an organization's activities, products, or services that can interact with the environment.

Environmental Impact: An environmental impact is any change to the environment, which is adverse or beneficial, wholly, or partly resulting from an organization's environmental aspects.

Environmental Management System (EMS): An EMS is a structured framework, forming part of the management structure, used to manage environmental aspects, fulfill compliance obligations, and address risks and opportunities of a company's products, services, and processes. It enables an organization to continually improve on its environmental performance and increase its operating efficiency through the allocation of resources, assignment of responsibilities, and ongoing review and evaluation of practices, procedures, and processes.

Interested Party: Person or organization that can affect, be affected by, or perceived to be affected by a decision or activity e.g., customers, communities, suppliers, regulators, non-governmental organizations and employees.

ISO 14001:2015: Is the international standard that specifies the requirements for an effective environmental management system (EMS). It provides a framework that an organization can follow.

Net Zero: Net-zero emission means reducing greenhouse gas (GHG) emissions from operations to as close to zero as possible and then balancing out any remaining emissions with an equivalent amount of carbon removal.

Risk assessment: The overall process of risk identification, risk analysis and risk evaluation.