



WINSHEAR METALS CORPORATION
(the “Company” or “Winshear”)

HEALTH AND SAFETY POLICY

*Adopted by the Board of Directors of
Winshear Metals Corporation
on February 26, 2021*

PURPOSE

Winshear Metals Corporation is committed to providing a safe and healthy work environment that provides a foundation for sustained positive and effective workplace and community relations. This Health and Safety Policy focuses on the foundation of Health and Safety.

We are committed to sustainable development and recognize that the long-term sustainability of our business is dependent upon good stewardship of the health and safety of our workers and communities.

PRINCIPLES

Winshear is committed to providing a safe and healthy workplace for all employees, contractors, consultants and visitors in the workplace and in communities in which we work. **No other business objective has higher priority.**

Health and safety requires a focus on eliminating or minimizing hazards in the workplace. These hazards may arise from:

1. The design, construction, physical attributes, and maintenance of, and housekeeping in, the working area;
2. The construction, installation, commissioning, and maintenance of equipment that is fit for safe operations;
3. Formulating, communicating, and auditing performance of Standard Operating Procedures (SOP's) to complete key tasks or processes in a safe manner while achieving the operational goals of the process.
4. The consistent wearing of Personal Protective Equipment (PPE) required for each work area and Standard Operating Procedure.
5. Selection, training and assignment of employees to work areas, work processes, and tasks who have the skills, capability, understanding of the relevant SOP's and commitment to complete the work safely with the results intended.

ACCOUNTABILITIES

The Project Manager has overall responsibility for Health and Safety at a project. The Manager is accountable for monitoring all of the five possible sources of hazards listed above; for causing rapid and effective corrective actions when and where deficiencies are noted; and for verifying that the corrective actions have had the intended effect. In particular, all managers will ensure that the Company:

- Provides the facilities, equipment, tools, PPE, procedures, safety programs and training for employees to work safely.
- Formulates and monitors Standard Operating Procedures for the safe use, handling, storage and transport of equipment and materials.
- Manages risk through the identification, elimination, monitoring and control of risk hazards, and implementing procedures accordingly, while reviewing performance.
- Ensures that all employees, including employees of contractors, suppliers and consultants, are fully instructed, trained and assessed in the tasks each will be required to perform and in the operation of all plant and equipment each will be required to operate.
- Ensures that all visitors to the project site receive a safety briefing program.
- Clearly defines, communicates and consults with employees—including employees of contractors, consultants, and suppliers—and where appropriate, involves them in the development of practices and procedures aimed at improvement of occupational health and safety performance.
- Ensures all employees, including employees of contractors, consultants, and suppliers, are fully aware of and trained in their responsibilities to take reasonable care and to ensure their own health and safety at work and avoid adversely affecting the health or safety of others through any act or omission at work.
- Informs contractors and visitors of this policy by posting it on the Company's website and at all project sites, requiring compliance from contractors and visitors to our projects and when performing work for us.
- Collects data recording the occurrence of, investigation of, and response to safety incidents and reports them to the Company.
- Complies with all laws and standards established by appropriate federal, state, regional and local governments and agencies in the jurisdictions within which it operates respecting the safety and health of our employees.
- Cooperates with government and the community stakeholders on occupational health and safety issues and contributes to the development of relevant occupational health and safety policy, legislation, standards and research, when needed.

All employees are accountable to ensure that they:

- Do not start work until they understand what work is to be done and how to do it safely, including wearing the proper PPE and executing the appropriate SOP's.
- Are fully engaged in the Company's safety management process. Engagement includes communicating with all the parties involved about safety-related behaviours and conditions and bringing to management's attention those issues which require their involvement and support.
- Report all known or observed hazards to their immediate Manager or Supervisor.

- Report all safety incidents, including fatalities, lost time injuries, medical treatment injuries, property damage, and near-misses to the Project Manager.

MEASURING SAFETY PERFORMANCE

Winshear measures its safety performance in terms of near misses, property damage, lost time injuries (“LTI”) and medical treatment injuries (“MTI”) when employees are conducting Company business onsite or offsite. It will track incidents and injuries involving employees, contractors and visitors.

- A near miss is defined as an unplanned event that did not result in serious injury, illness or property damage but had the potential to do so and was avoided only through good fortune.
- A property damage incident is one that leads to damage to property or equipment that costs more than \$500 to repair or replace.
- An LTI is defined as an occupational injury that resulted in one or more days away from work.
- An MTI is defined as an occupational injury that required medical attention from a qualified person (Registered Nurse or Doctor) other than first aid but did not restrict the person from returning to work the following shift.

All incidents as defined above will trigger an investigation of the root cause, performance of remedial action, and the identification and implementation of an improvement to procedures to prevent occurrence of another incident with the same root cause. The Project Manager is accountable for conducting and documenting the investigation report.

On a weekly basis, the Company will communicate information related to the safety performance of the operations at each project location. Winshear shall report to the Board of Directors at the end of each quarter the near misses, property damage, LTIs and MTIs for each operation and the consolidated Company. In addition, the Project Managers will report to executive management what happened, the root cause, and remedial actions to mitigate the root cause for each incident. Project managers shall report immediately to executive management in the event of a fatality or other serious incident, and executive management shall report the fatality or other serious incident immediately to the Board.

COMPLIANCE

Winshear will comply with all health and safety laws and regulations in the jurisdictions in which we work, and shall consider compliance with the law to be the minimum standard by which the Company operates.

REPORTING

Personnel are to report observed safety hazards and safety incidents to the Project Manager. The Project Manager will report all incidents to the Company in monthly reports, and will report any fatalities or other serious incidents immediately.

If any Personnel is uncomfortable with safety conditions at any site, and after bringing their

concerns to the Project Manager remains unsatisfied, they are encouraged to contact the President of Winshear and/or submit a Whistleblower complaint as described in the Winshear Whistleblower policy.

CONSEQUENCES

Failure to comply with this policy may lead to disciplinary action, up to and including termination of employment.

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