



INSULA

CONTAINER CONVERSIONS INC.

HEALTH, SAFETY & ENVIRONMENT (HSE) POLICY

Company Policy & Management Commitment

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Revision	1
Effective Date	June 23 2023
Review Cycle	Annual or following a significant change/incident
Approved By	President, Insula Container Conversions Inc.

Applies to all Insula employees, temporary workers, contractors, visitors and work locations.

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INSULA CONTAINER CONVERSIONS INC. | HEALTH, SAFETY & ENVIRONMENT

1. Purpose and Commitment

Insula Container Conversions Inc. is committed to conducting its operations in a manner that protects the health and safety of workers, contractors, visitors, customers and the public, while preventing pollution and minimizing adverse environmental impacts. Health, safety and environmental performance are core operating requirements and are to be considered in

planning, design, procurement, fabrication, assembly, installation, commissioning, service and field work.

Management will provide reasonable resources, competent supervision, training, equipment and procedures needed to support safe work. Every person working for or on behalf of Insula is expected to take an active role in identifying hazards, controlling risk, protecting the environment and stopping work where an unacceptable risk exists.

2. Scope

This policy applies to Insula operations at the Langton manufacturing facility, the Delhi office, customer and project sites, yards, delivery locations, temporary work areas and any other location where Insula-controlled work is performed. It covers employees, temporary workers, subcontractors, service providers and visitors while engaged in Insula activities.

3. HSE Principles

Comply with applicable occupational health and safety, environmental, transportation, fire, electrical and other legal or contractual requirements relevant to the work.

Plan work before it begins, identify hazards and environmental aspects, and apply controls using the hierarchy of controls.

Provide workers with information, instruction, training, supervision and appropriate personal protective equipment (PPE).

Maintain tools, machinery, vehicles, lifting equipment and facilities in safe working condition.

Prevent injuries, occupational illness, property damage, spills, releases, waste and unnecessary consumption of resources.

Report hazards, near misses, incidents and environmental events promptly, investigate causes and implement corrective actions.

Consult workers and encourage participation in HSE improvement without reprisal for raising a legitimate safety or environmental concern.

Continually improve HSE performance through inspections, corrective actions, training, management review and lessons learned.

4. Roles and Responsibilities

4.1 President / Senior Management

Establish and maintain the HSE program and demonstrate visible leadership.

Provide resources and assign competent persons for work requiring specialized knowledge or authorization.

Ensure significant HSE risks are considered during project planning, design and procurement.

Review serious incidents, significant environmental events, trends and corrective actions.

Review this policy at least annually and when operations, legislation or risk materially change.

4.2 Supervisors / Project Leads

Plan and coordinate work so hazards are identified and controlled before work starts.

Confirm workers are trained, competent and equipped for assigned tasks.

Conduct or ensure completion of workplace inspections, pre-job reviews and required documentation.

Correct unsafe conditions and behaviours promptly and escalate issues that cannot be immediately controlled.

Ensure incidents, near misses and spills are reported and investigated.

4.3 Workers and Contractors

Work in accordance with legislation, training, procedures, project requirements and manufacturer instructions.

Use required guards, controls and PPE and inspect equipment before use.

Report hazards, defective equipment, injuries, near misses, spills and unsafe conditions immediately.

Do not perform work for which they are not trained, authorized or competent.

Exercise the right and responsibility to stop or refuse unsafe work in accordance with applicable law and Insula procedures.

5. Hazard Identification and Risk Control

Before non-routine or higher-risk work begins, the responsible supervisor or project lead will assess foreseeable hazards and establish controls. Risk assessments may include project reviews, job hazard analyses, pre-job meetings, inspections, safe work procedures and customer/site requirements.

Controls should be selected in the following order wherever practicable: elimination, substitution, engineering controls, administrative controls, and PPE. Work must be reassessed when conditions change, new equipment or materials are introduced, an incident occurs, or the original controls are no longer effective.

6. Minimum Safe Work Requirements

PPE: minimum PPE will be defined by the task and site. Safety footwear, eye protection, hearing protection, gloves, high-visibility apparel, respiratory protection, fall protection or other PPE will be used where required.

Machinery and tools: guards and safety devices must remain in place. Defective equipment must be removed from service or clearly tagged until repaired.

Lockout / hazardous energy: equipment must be isolated and verified before maintenance, servicing or work where unexpected energization could cause injury.

Electrical work: electrical installation, modification and testing will be completed by qualified persons and certified/inspected where required.

Hot work: welding, cutting, grinding and other ignition-producing work will be controlled for fire hazards, ventilation, combustible materials and required fire protection.

Lifting and material handling: loads, lifting points, slings, forklifts, jacks and other equipment must be suitable for the task and used by trained/authorized persons.

Working at heights: appropriate fall prevention or fall protection will be used where required. Improvised access methods are prohibited.

Chemicals and hazardous products: products must be labelled, stored and handled appropriately, with current safety data sheets available and WHMIS requirements followed.

Housekeeping: aisles, exits, work areas and access to emergency equipment must be kept clear. Scrap, cords, hoses and materials must be managed to reduce trip, fire and handling hazards.

Vehicles and field work: drivers must be licensed and fit for duty. Site-specific hazards, traffic, weather, ground conditions and unloading/installation activities must be assessed before work begins.

7. Environmental Protection

Insula will manage environmental aspects proportionate to the nature and scale of its activities. Controls will focus on preventing releases and reducing waste while meeting applicable legal, customer and site requirements.

Store fuels, oils, paints, solvents, chemicals and wastes to reduce the risk of leaks, spills and incompatible mixing.

Use spill prevention and response materials where fuels, oils or chemicals are handled; report and contain releases promptly when safe to do so.

Segregate and recycle metals, cardboard, wood, batteries, electronics and other materials where practical and approved disposal streams exist.

Manage hazardous and liquid wastes through appropriate authorized disposal or recycling channels; do not discharge substances to drains, soil or water unless specifically permitted.

Control dust, fumes, noise and emissions using appropriate work methods, ventilation, extraction, containment or scheduling.

Use energy, water and materials efficiently and consider durable, repairable and reusable solutions during design and procurement where practical.

Protect customer sites and surrounding land, drainage systems and waterways during delivery, installation and service activities.

8. Emergency Preparedness and Response

Insula will maintain emergency arrangements appropriate to each work location and project. Workers will be informed of emergency contacts, alarms, exits, muster points and site-specific procedures where applicable.

Call emergency services when required and do not place yourself or others at additional risk.

Provide first aid within the limits of training and available equipment.

For fire, evacuate and use extinguishers only when trained, conditions are safe and there is a clear escape route.

For spills or releases, stop the source if safe, protect drains and waterways, contain the material, notify supervision and arrange proper cleanup/disposal.

Preserve the scene of a serious incident except where disturbance is necessary to rescue a person, prevent further injury or protect property/environment, subject to legal requirements.

9. Incident, Near-Miss and Hazard Reporting

All injuries, occupational illnesses, property damage, near misses, environmental releases and significant hazards must be reported to supervision as soon as practicable. Required external notifications will be made by management or its designate. Investigations will focus on facts, contributing factors and corrective actions rather than blame. Corrective actions will be assigned, tracked and verified for completion.

10. Training and Competency

Workers will receive orientation and task-specific training appropriate to their duties. Training may include WHMIS, PPE, equipment operation, lifting, fall protection, lockout, first aid, fire safety, electrical safety, hot work, spill response and customer/site requirements. Records of required training and qualifications will be maintained. Contractors are responsible for providing competent personnel and evidence of qualifications when requested.

11. Contractor and Visitor Management

Contractors must comply with Insula HSE requirements and all applicable site rules. Higher-risk subcontracted work may require proof of training, insurance, permits, safe work procedures or other documentation before work begins. Visitors must follow site instructions, remain within authorized areas and use required PPE.

12. Fitness for Duty and Workplace Conduct

Personnel must report fit to perform assigned work safely. Impairment from alcohol, cannabis, illegal drugs, medication, fatigue or any other cause that creates a safety risk is not acceptable. Horseplay, violence, harassment, deliberate bypassing of safety controls and reckless conduct are prohibited. Workers should advise supervision when a condition may affect safe performance so appropriate work arrangements can be considered.

13. Inspections, Corrective Action and Continuous Improvement

Insula will use routine workplace observations and inspections to identify deficiencies and improvement opportunities. Findings will be prioritized according to risk. Management will periodically review HSE performance, incidents, corrective actions, training needs, changes in operations and relevant legal or customer requirements. Lessons learned will be incorporated into procedures, designs and project planning where appropriate.

14. Records and Document Control

HSE records may include orientations, training certificates, inspections, risk assessments, incident reports, corrective actions, equipment checks, contractor documentation, waste records and emergency information. Controlled HSE documents will be identified by title, revision and effective date. Superseded versions will be removed from points of use or clearly identified as obsolete.

15. Policy Communication and Enforcement

This policy will be communicated to workers and made available to relevant interested parties as appropriate. Failure to follow HSE requirements may result in removal from the work area, retraining, corrective action, contractor review or other measures appropriate to the circumstances. No production, schedule or cost objective takes priority over controlling an unacceptable risk to people or the environment.

16. Approval

Approved by	Michael Kowal, President
Signature	<i>Michael J Kowal</i>
Date	June 23 2026
Next Review	June 23 2027, or earlier if required

Document Revision History

0	2027-06-23	Initial issue	President