



**Magino Project
Environmental Impact Statement
Technical Support Document 20-2
Health and Safety Management Plan**

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ABBREVIATIONS

AED	Automated External Defibrillator
PRODIGY	PRODIGY Gold Incorporated
CPR	Cardiopulmonary Resuscitation
DEIS	Environmental Impact Statement
EHS	Environmental, Health, and Safety
EHS Policy	Environmental, Health, and Safety Policy
EIS	Environmental Impact Statement
EPCM	Engineering, Procurement, and Construction Management
ESIA	Environmental and Social Impact Assessment
IRS	Internal Responsibility System
Magino Project	the Project
OHSA	Ontario Occupational Health and Safety Act
OH&S the Code	Occupational Health and Safety Code of Ethics

SECTION 1.0 - CONTEXT, PURPOSE, AND ORGANIZATION

Prodigy is committed to protecting the safety and health of our employees and contractors, and the communities in which we operate. This Health and Safety Management Plan aims to implement the policies and approaches outlined in the Environmental Management System (EMS) (TSD 20-1).

Prodigy has an EHS Policy and a Code of Ethics that provide the framework for the EMS. These documents are posted on the Argonaut Gold's website. Prodigy's Health and Safety Management Plan (H&SMP) is based on the principle of continuous improvement, is consistent with the Occupational Health and Safety Management System (OHSAS) 18001, dated 2007, and complies with all requirements of the Ontario Occupational Health and Safety Act (OHSA).

Prodigy's Health and Safety Management Plan is in place to control health and safety risks of company activities. This plan contains the following elements:

- Policy;
- Legal Requirements;
- Hazard identification and Risk Assessment;
- Health and Safety Targets and Objectives;
- Roles and Responsibilities;
- Training and Awareness;
- Reporting and Documentation;
- EHS Communication;
- Operational Control;
- Emergency Preparedness and Response;
- Performance Measurement and Monitoring;
- Accidents, Incidents, Non-Conformance, and Corrective/Preventive Actions;
- Records and Records Management;
- Audits and Assurance; and
- Management Review.

SECTION 2.0 - POLICY

Prodigy's Health and Safety Policy is presented in Figure 1.

Prodigy is committed to leadership and continuous improvement in environmental, health, and safety practices for the benefit of employees, contractors, and communities. This will be accomplished by:

- Providing a safe and healthy workplace;
- Integrating environmentally sound practices into all processes;
- Complying with applicable laws, regulations, policies, and standards;
- Conserving natural resources and energy;
- Providing necessary resources to support environment, health, and safety goals and objectives; and
- Integrating environmental, health, and safety goals and objectives with an overall business strategy.

2.1 HEALTH AND SAFETY GOALS

Prodigy's goals are to achieve:

- An accident / incident free-culture; and
- A sustainable and competitive business advantage through leadership and excellence in environmental, health, and safety.

Prodigy is focused on everyone's safety. Prodigy's objective is to implement processes and systems for safety excellence and integrate them in everyday activities to develop safe behaviour and ensure a safe place for employees. Environmental, health, and safety excellence requires a daily commitment by all employees.

2.2 PRODIGY'S COMMITMENTS

Prodigy provides adequate resources to implement and maintain the EHS Management System, including the necessary human, material, and financial resources.

2.3 UPDATE OF THIS MANAGEMENT PLAN

The Health and Safety Management Plan will be regularly updated based on management reviews (see Section 15), incident investigations, regulatory changes, or other Project-related changes. For the construction stage of the project, the engineering, procurement and construction management (EPCM) contractor will assume leadership of the Health and Safety Management Plan for all construction-related activities. Prodigy will perform regular audits of the EPCM contractor's Health and Safety Management Plan to ensure that it complies with Prodigy's E&HS Policy, safety goals and objectives.

Figure 1: Prodigy Health and Safety Policy

PRODIGY
GOLD INCORPORATED

HEALTH AND SAFETY POLICY

The employer and senior management of PRODIGY are vitally interested in the health and safety of its workers. Protection of workers from injury or occupational disease is a major continuing objective.

PRODIGY will make every effort to provide a safe, healthy work environment. All employers, supervisors and workers must be dedicated to the continuing objective of reducing risk of injury.

PRODIGY, as an employer, is ultimately responsible for worker health and safety. As president (or owner/operator, chairperson, chief executive officer, etc.) of PRODIGY, I give you my personal commitment that I will comply with my duties under the Act, such as taking every reasonable precaution for the protection of workers in the workplace.

Supervisors will be held accountable for the health and safety of workers under their supervision. Supervisors are subject to various duties in the workplace, including the duty to ensure that machinery and equipment are safe and that workers work in compliance with established safe work practices and procedures.

Every worker must protect his or her own health and safety by working in compliance with the law and with safe work practices and procedures established by the employer. Workers will receive information, training and competent supervision in their specific work tasks to protect their health and safety.

It is in the best interest of all parties to consider health and safety in every activity. Commitment to health and safety must form an integral part of this organization, from the president to the workers.

Signed:

Chief Executive Officer

www.labour.gov.on.ca/english/hs/pubs/ohsa/ohsag_appx_a.php

SECTION 3.0 - LEGAL REQUIREMENTS

Specific knowledge of legal and other requirements and associated tasks are necessary to establish objectives and targets as well as to develop adequate management plans and operational controls to achieve the objectives and targets.

The significant current legislation governing occupational health and safety is as follows:

- Occupational Health and Safety Act, R.S.O. 1990, c. O.1
- O.Reg 854 - Mines and Mining Plants
- *Hazardous Product Act* and WHMIS 2015 Regulation
- O.Reg. 860 – Workplace Hazardous Materials Information Systems (WHMIS)
- *Workers' Compensation Act*, R.S.O 1990, c. W.11
- *Transportation Of Dangerous Goods Act*, 1992

Prodigy EHS staff will continually monitor legislation for any amendments and implement compliance programs and employee communication, with these changes, as required.

Prodigy has a written operational control to identify changes in activities, occupations, operations, and facilities that might affect the application of legal and regulatory requirements as well as health and safety risks. The operational control indicates who in management receives results of the report on changes and includes a regular review of the control. Operational controls for identifying such changes include workplace inspections and regular interviews with area supervisors on changes in their areas.

SECTION 4.0 - HAZARDS IDENTIFICATION

Knowledge of hazards and evaluation of associated risks are necessary requirements for establishing health and safety objectives and targets, and for setting priorities to control the identified risks to employees and others on an ongoing basis. All contractors and subcontractors involved in the exploration, construction, and operation of the Project are required to carry out hazard identification.

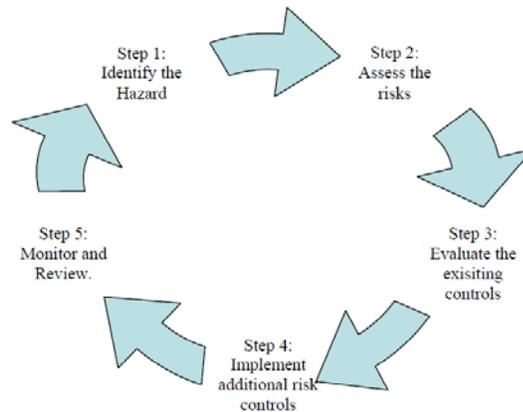
For all phases of the Project, Prodigy will have knowledge of potential hazards through such sources as:

- Legal and regulatory requirements;
- Company sustainable development policy and supporting policies;
- Records of incidents, accidents and non-conformances;
- EHS management system audits;
- Company EHS audits;
- Communications from employees and others;
- Information from health and safety consultations;
- Information on best practices, typical hazards for the industry, and incidents and accidents in other organizations;
- Details of changes in occupations, facilities and activities;
- Inventory of hazardous materials and the toxicology of the hazardous materials;
- Monitoring data;
- Existing administrative, engineering and personal protective equipment controls;
- Workplace knowledge and other data;

- Professional judgment;
- Process hazard analysis; and
- Management of change process.

Prodigy's Hazard Identification and Risk Assessment, and Controls Methodology (refer to EHS Management Framework, EIS, TSD-21, Appendix 4) is used to document ongoing identification of hazards and classification of risks for routine and non-routine events associated with activities, occupations, and facilities for all phases of the project. This procedure includes five distinctive steps (see Figure 2).

Figure 2: Hazard Identification, Risk Assessment and Controls Methodology



Based on the Hazard Identification, Risk Assessment, and Controls Methodology, Prodigy creates a list of activities, occupations, and facilities and associated hazards with established priorities for risk control and action.

The hazard identification and risk assessment forms the basis for establishing and documenting health and safety objectives and targets, and subsequent action to achieve established objectives and targets. Each hazard classified as representing a priority risk requires an action plan with recommendations to control that risk. Recommendations include consideration for operational controls, training and awareness, and performance measurement and monitoring.

The action plan and recommendations are forwarded to the area management responsible for follow-up. In all cases, the action plan and recommendations are communicated to the interested and affected employees (and others as required). Typically, the recommendations are implemented in consultation with interested and affected employees (and others as required).

4.1 OCCUPATIONAL HEALTH AND SAFETY COMMITTEE

Involvement of everyone in EHS activities is the most powerful way to develop personal EHS values and build awareness and commitment. Prodigy encourages employee participation by providing mechanisms that:

- Support participation (by identifying and removing barriers to participation);
- Establish a workplace EHS committee(s) and employee representatives; and
- Ensure that employees and employee representatives are trained in, and consulted on, all aspects of EHS associated with their work.

An EHS Committee(s) is established at the operation/facility that will function in accordance with the MOL "Guide for Joint Health and Safety Committees and Health and Safety Representatives in the Workplace" (www.labour.gov.on.ca/english/hs/pubs/jhsc/index.php)

Prodigy will ensure that:

- EHS meetings are held regularly, at least every 30 days;
- Employees are represented in EHS committees through all levels of the organization and criteria for minimum participation (i.e., attendance) of committee members are established and enforced;
- EHS committees have goals and objectives that support the operation's EHS goals and objectives, that progress is tracked, and results are reported and followed-up; and
- Minutes of committee meetings and follow-up action plans are documented and available to all employees. Minutes include attendance and follow-up action plans to identify outstanding issues, recommendations to management, planned actions, assigned responsibility, and timeframes for completion. Action plans are reviewed at subsequent EHS meetings. Action plan items are completed within a reasonable timeframe.

4.2 HAZARD AND RISK IDENTIFICATION REVIEWS

Prodigy determines and communicates appropriately a timeframe to complete written initial hazard identification and risk assessment of identified occupations, activities, and facilities that might present health hazards.

Prodigy has written operational controls to review hazard identification, risk assessment, and risk control. Reviews will be conducted annually and the review documented and made available for all employees.

Prodigy has a written operational control to necessitate a review of any occupation, facility, and activity when there has been a change in the occupation, facility, or activity, or any other change that could affect the initial hazard identification and risk assessment.

SECTION 5.0 - HEALTH AND SAFETY TARGETS AND OBJECTIVES

Objectives and targets are necessary and are established at all levels of the company and for all contractors. Objectives and targets are documented and monitored to improve EHS performance.

5.1 HEALTH AND SAFETY STRATEGIES

- Senior Management: Senior management must provide leadership for health, safety, and environment activities and assumes overall responsibility for success of the EHS Management System;
- Line Management Driven:
 - Line supervisors play a pivotal role in the success of the EHS programs.
 - EHS policies, programs, and procedures are consistently applied throughout the Project by PRODIGY's supervisors as they direct the workforce in their daily duties.
- Visibly demonstrated commitment:
 - EHS excellence only occurs when supervisors, managers, and executives demonstrate their values through actions and their credibility by engaging employees to actively participate in the program.

- Annual target reductions:
 - By establishing annual leading and lagging indicators for EHS improvements, Prodigy will strive for continuous improvement by meeting these reductions in maintaining EHS performance.
- High level of accountability:
 - Every employee is held accountable for exercising sound judgement and skills in a reasonable, practical, and timely way to prevent accidents and injuries.

5.2 HEALTH AND SAFETY PRINCIPLES

All incidents can be prevented. Core beliefs are that:

- All injuries and environmental incidents are preventable; and
- Injuries and incidents are not mere chance occurrences, but represent a system failure.

Employee involvement is essential. Employees are required to practice good housekeeping, participate in training, report hazards and injuries, use personal protective equipment, and practice safe work habits.

Management is responsible and accountable for preventing injuries. Leadership is all about people, and safety, at its essence, is respect through action for the well-being of people.

Working safely is a condition of employment. Prodigy's approach is "Safe from the Start." Each employee is held accountable for using sound judgement to prevent injuries.

All operating exposures can be controlled. Prodigy will continually analyze its process and procedures to maximize efficiency and reduce safety risks.

An acceptable EHS program is achieved when incidents and injuries are treated as intolerable, responsibilities and expectations are clearly defined, communication is open, and the organization is employee-centred.

5.3 CHALLENGING GOALS AND OBJECTIVES

Objectives and targets are necessary and can be established at all levels of the company. They are documented and measurable objectives and targets to monitor and improve EHS performance regarding health and safety risks, and environmental aspects and impacts.

Objectives and Targets

Each operating department will establish and document specific objectives and targets which are aligned with Prodigy objectives and targets, demonstrate continuous improvement in EHS performance and achieve the goal of "zero harm."

Each operating department will establish EHS targets and objectives annually. Each target and objective is to have an associated action plan. The plan for achieving objectives and targets includes:

- Identifying the planned action;
- Designating responsibility for achieving objectives and targets;
- Determining timeframe within which the objectives and targets are to be achieved; and
- Verifying completion.

Review of Objectives and Targets

Targets and objectives are reviewed regularly (at least annually) and progress toward meeting established objectives is measured and tracked (e.g., key performance indicators for EHS).

Communication of Targets and Objectives

Objectives and targets for the operating department are communicated to employees throughout the organization, and facility or department objectives and targets are communicated throughout the respective areas.

5.4 EHS BEST PRACTICES

Incident rate is usually calculated by multiplying the number of total recordable injuries by 200,000 and dividing by the hours worked. Severity rate is usually calculated by multiplying the number of lost-time workdays by 200,000 and dividing by the hours worked.

Prodigy will strive to reduce these rates to the lowest possible level and will strive to continuously improve to achieve world-class performance by ensuring strict adherence to the following strategies:

- EHS is line management-driven;
- Annual target reduction for EHS;
- Performance accountability (covered in annual performance review);
- High visibility for EHS (site inspection and job observations);
- Compliance auditing (planned inspections);
- Practical risk assessment;
- Team communication and consultation (EHS meetings, OHSC meetings);
- Training and awareness (all employees);
- Recognition for individual and team EHS performance;
- Document and data control;
- Emergency preparedness and response;
- Audits and assurance; and
- Management reviews.

SECTION 6.0 - ROLES AND RESPONSIBILITIES

Prodigy will regularly review and update any changes in roles, responsibilities, and accountabilities.

6.1 SENIOR MANAGEMENT

Senior management has the greatest responsibilities with respect to health and safety in the workplace and is responsible for taking every precaution reasonable in the circumstances for the protection of a worker. Prodigy is responsible for ensuring that the Internal Responsibility System (IRS) is established, promoted, and that it functions successfully. A strong IRS is an important element of a strong health and safety culture in a workplace. A strong health and safety culture shows respect for the people in the workplace.

Prodigy's Vice President Sustainability is responsible for implementing the EHS Management System. The VP Sustainability ensures that EHS management system requirements are

established, implemented, and maintained. The VP Sustainability also ensures that reports on performance of the EHS Management System are presented to senior management.

6.2 SUPERVISORS

Supervisors are responsible for making workers fully aware of the hazards that may be encountered on the job or in the workplace; and ensuring that they work safely, responding to any of the hazards brought to their attention, including taking every precaution reasonable in the circumstances for the protection of a worker.

6.3 EMPLOYEES

Employees responsibilities include: reporting hazards in the workplace; working safely and following safe work practices; using the required personal protective equipment for the job at hand; and participating in health and safety programs established for the workplace.

Employee involvement is essential. Involvement of employees at all levels is needed for effective performance of HSE-related tasks. All employees are required to practice good housekeeping, participate in training, report hazards and injuries, use personal protective equipment, and practice safe work habits. It is necessary that roles, responsibilities, and accountabilities be defined, documented, and communicated.

Each employee is expected to actively participate in, and take ownership of Environmental, Health, and Safety Policy, goals, and objectives. Line management will be accountable for implementing this policy. Senior management will be visibly committed and actively supportive of this policy.

6.4 CONTRACTORS

For all phases of the project, Prodigy and the EPCM contractor will work closely together. They will define, document, and maintain a list of the roles, responsibilities, and accountabilities of the employees (management) responsible for EHS performance in their areas. They will also review the implementation of their respective EHS Management System, and the EHS personnel advising and assisting management to meet their EHS Management System responsibilities.

6.5 HEALTH AND SAFETY REPRESENTATIVES/JOINT HEALTH AND SAFETY COMMITTEES

The health and safety representatives (EHS committee) contribute to workplace health and safety because of their involvement with health and safety issues, and by assessing the effectiveness of the IRS.

6.6 THE THREE RIGHTS OF WORKERS

The OSHA gives workers three important rights:

1. The right to know about hazards in their workplace and to get information, supervision and instruction to protect their health and safety on the job;
2. The right to participate in identifying and solving workplace health and safety problems either through a health and safety representative or a worker member of a joint health and safety committee; and

3. The right to refuse work that they believe is dangerous to their health and safety or that of any other worker in the workplace.

The Right to Know

Workers have the right to know about any potential hazards to which they may be exposed in the workplace. The primary way that workers can become aware of hazards in the workplace is to be informed and instructed on how to protect their health and safety, including health and safety related to the use of machinery, equipment, working conditions, processes and hazardous substances.

Prodigy will enable the workers' right to know in various ways, such as making sure they get:

- Information about the hazards in the work they are doing;
- Training to do the work in a healthy and safe way; and
- Competent supervision to stay healthy and safe.

The Right to Participate

Workers have the right to be part of the process of identifying and resolving workplace health and safety concerns. This right is expressed through direct worker participation in health and safety in the workplace and/or through worker membership on joint health and safety committees or through worker health and safety representatives. Prodigy encourages employee participation in the EHS committee.

The Right to Refuse

Workers have the right to refuse work that they believe is dangerous to either their own health and safety or that of another worker in the workplace. Workers may refuse work if they believe their health and safety is endangered by any equipment they are to use or by the physical conditions of the workplace. Section 43 of the Act describes the exact process for refusing work and the responsibilities of the employer/supervisor in responding to such a refusal.

In certain circumstances, members of a joint health and safety committee who are "certified" have the right to stop work that is dangerous to any worker. Sections 45 – 47 of the Act sets out these circumstances and how the right to stop work can be exercised.

SECTION 7.0 - TRAINING AND AWARENESS

All employees need some level of training depending on whether they manage, perform, or verify activities affecting health and safety risks or environmental aspects. A key factor is to match training provided with training needed. Training and awareness needs are determined by:

- Results of the environmental aspects evaluation;
- Results of hazard identification, risk assessment, and risk control;
- Company sustainable development policy and supporting policies;
- Legal and regulatory requirements;
- Established objectives and targets; and
- Management Plans.

Prodigy identifies and documents training needs and delivers appropriate training to all employees whose work might affect risks to health and safety in the workplace and whose work might create a significant environmental impact. All Prodigy contractors are required to abide by this requirement. Employees and others are made aware of:

- Importance of conformance to requirements of the EHS Management System and EHS policies;
- Risk associated with work in a remote environment;
- Risk associated with work in extreme climatic conditions;
- Risk to the environment and to health and safety of their work activities;
- Risk to the environment and to health and safety of deviations from specified operational controls;
- Benefits of a healthy and safe workplace; and
- Their specific roles and responsibilities in achieving compliance.

Prodigy's training and awareness plan considers:

- The differing levels of risk;
- The remoteness of the site and the climate;
- The different responsibilities, abilities, and literacy of employees;
- The culture;
- Trainers;
- Training methods and settings;
- Training frequency;
- Contractors;
- Documentation of training; and
- Evaluation of training.

Prodigy regularly reviews and updates the training and awareness plan based on changes in training needs related to EHS Management System awareness, occupation-specific training, and regulatory-required training.

Emergency personnel will receive training in first aid and CPR and will practice hands-on rescue techniques. Employees will undergo formal safety and emergency response training. The training will identify site-specific hazards and hazards associated with the project in general. The training will also review standard operating procedures, use of personal protective equipment, signalling an emergency, evacuation routes and muster locations, reporting and notification protocol, and other general safety procedures.

As part of site orientation and ongoing awareness training, all site personnel are informed that any spill of fuel or other hazardous liquids or solids, whatever the extent, has to be reported immediately to the site HSE Supervisor.

An appropriate number of site personnel are selected and appropriately trained to form the Emergency Response Team (ERT). Crew members are trained in emergency spill response procedures and operations. Training includes knowledge in the:

- Properties of hazardous materials used on site;
- Common causes of spills;
- Environmental effects of spills;
- Worker health and safety during emergency interventions;
- Personal protective equipment and clothing;

- Spill response procedures and techniques on land, water, snow, and ice, and during all four seasons; and
- Spill response equipment and materials.

Training also includes analysis of potential spill events. Fuel spills are more likely to be caused by:

- Human error during fuel transfer operations (e.g., tank farm to tanker-trucks, tanker trucks to mobile equipment and drums to helicopters;
- Rupture of tanks, supply lines, or valves from accidental damage, deterioration, or equipment failure; and
- Road accidents involving tanker-trucks.

For emergency response crews, training includes spill response field drills and classroom training.

SECTION 8.0 - REPORTING AND DOCUMENTATION

Reporting and documentation requirements are outlined in Prodigy's EMS Framework (refer to EIS TSD-20). During the construction phase of the project, the EPCM contractor will be required to implement a reporting and documentation system that satisfies Prodigy's EMS documentation and reporting standards.

SECTION 9.0 - COMMUNICATION

Communication requirements are outlined in Prodigy's EMS Standard (refer to EIS TSD-20). During the construction phase of the project, the EPCM contractor will be required to implement an EHS communication plan that satisfies Prodigy's EMS communication standards.

SECTION 10.0 - OPERATIONAL CONTROL

Operational controls include administrative, engineering, and personal protective equipment controls and other protective measures (e.g., machine guarding, railing). Administrative controls include programs, standard operating procedures, practices, guidelines, and instructions. Operational controls are the significant means and actions to control health and safety hazards and risks, and environmental aspects and significant impacts. They help achieve the requirements of the company EH&S Policy and supporting policies, established objectives and targets, and compliance with legal and other requirements.

Prodigy will regularly review:

- Legal and regulatory requirements;
- Occupations, facilities, and activities where the level of risk is such that further control measures are needed; and
- Environmental aspect evaluations where the significance is such that further control measures are needed.

When considering the outcome of such reviews, Prodigy develops operational controls:

- To control identified health and safety risks (including those that could be introduced by others such as contractors and visitors) and the significant environmental impacts;
- That stipulate operating criteria;

- For the design of workplace, process, installations, machinery, operational controls, and the work organization (e.g., 8-hour and 12-hour shifts), including their adaptation to human capabilities to eliminate or control adverse environmental impacts, and health and safety risks at their source; and
- To cover situations where the absence of operational controls could lead to non-conformance with legal and other requirements, the company sustainable development policy and supporting policies, and established objectives and targets.

Prodigy regularly reviews and updates the operational controls for suitability and effectiveness in controlling health and safety risks, and adverse environmental impacts.

SECTION 11.0 - EMERGENCY PREPAREDNESS AND RESPONSE

Emergencies that could result in an accident or incident causing injuries, illnesses, or environmental impacts, or that could cause health and safety risks or environmental impacts, need to be considered in the EHS Management System.

Prodigy establishes and maintains operational controls to identify the potential for and responses to accidents, incidents, and emergency situations, and to prevent and mitigate the likely associated injury, illness, and adverse environmental impacts (refer to EIS TSD 20-3 for Emergency Response and Spill Prevention / Contingency Plan).

Prodigy regularly reviews its emergency preparedness and response plans and operational controls. In addition, a timely review will be undertaken after accidents, incidents, or emergency situations.

SECTION 12.0 - PERFORMANCE MEASUREMENT AND MONITORING

It is important to identify key parameters to measure and communicate performance internally and externally, including compliance with relevant legal and other requirements, incident trends and progress toward objectives and targets.

The ultimate indicators of the effectiveness of the EHS Management Plan are:

Table 1: Ultimate Indicators of the Effectiveness of the EHS Management Plan

Indicator (as defined by OSHA)	PRODIGY Performance Target
Recordable incident rate	Less than 2
Lost-time injury rate	Less than 1

Prodigy recognizes that there is no single reliable measure of health and safety performance. What is required is a “basket” of measures or a “balanced scorecard” that provides information on a range of health and safety activities. Leading indicators, or positive performance measures (PPM), provide information on how the system operates in practice, identifies areas where remedial action is required, provides a basis for continuous improvement, and provides a mechanism for feedback and consequential motivation (see Table 12-2). Monitoring these leading indicators (PPM) will ensure the effectiveness of the EHS Management Plan and that Prodigy’s targets and objectives are met.

Table 2: Positive Performance Measure for Safety

Objective	Indicator	Measure/Monitor	Results	Improvement
All activities to be subject to hazard analysis and risk assessment	Risk Assessment	% Risk assessment complete % Control measures implemented	Track reported % monthly by area/department	Review progress at monthly senior management meetings, and target areas for improvement
Written work procedures in place for critical activities	Work procedures	% Written procedures complete	Track reported % monthly by area/department	Review progress at monthly senior management meetings, and target areas for improvement
Provision of safe workplace	Work place inspection target for each frontline supervisor across the whole site on a monthly basis each with a specific area Workplace visibility tour by middle and senior managers once per month	% Scheduled inspections completed by name and work area/department. % Actions arising completed by name and work area/department. % Visibility/inspection tours completed.	Track reported % monthly by area/department	Review progress at monthly senior management meetings, and target areas for improvement
Employees working safely	Performance based observations	% Employees working safely % Personnel protective equipment (PPE) compliance	Track reported % monthly by area/department	Review progress at monthly senior management meetings, and target areas for improvement
Incident reporting and implementation of remediation measures	Timeliness of reporting Incident investigation effectiveness Log of corrective actions	% Incidents reported within 24 hours % Near-miss incidents % Incident investigation complete on time % Corrective actions implemented <i>All by area/dept.</i>	Track reported % monthly by area/department	Review progress at monthly senior management meetings, and target areas for improvement

Safe and competent employees	Performance assessment including training needs identification and Training records	% Performance assessments complete % Scheduled training complete <i>All by area/dept.</i>	Track reported % monthly by area/department	Review progress at monthly senior management meetings, and target areas for improvement
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Table 3: Examples of the Application of Positive Performance Measures for Safety

Objective	Indicator	Measure/monitor	Results	Improve
Improve safety awareness	Toolbox talks on targeted topics monthly by all Supervisors	% Toolbox talks completed by department % Employees attending % Actions arising completed All by Area/Dept. % Safety Representatives Trained	Track reported % monthly by area/department	Review progress at monthly senior management meetings, and target areas for improvement
Improve safety culture	Annual climate survey	Overall findings based on selected criteria All by Area/Dept.	Track trends annually by area/department	Review progress at annual senior management meetings, target areas for improvement

SECTION 13.0 - ACCIDENTS, INCIDENTS, NON-CONFORMANCES AND CORRECTIVE AND PREVENTIVE ACTION

Root or basic cause analysis is important for evaluating and investigating accidents, incidents and non-conformance and for establishing objectives and targets for a successful corrective action program. Through this process, the actions taken to address non-conformance can result in permanent and positive changes in the EHS Management System and continuous improvement. It is important that employees with health, safety, and environmental responsibility be part of this process to assist in identifying actual and potential health and safety risks, and adverse environmental impacts.

Prodigy has written operational controls for handling and investigating potential accidents, incidents, and non-conformance that include:

- Tracking and recording details of accidents, incidents, and non-conformance;
- Root or basic cause analysis;

- Mitigating any health and safety risks and adverse environmental impacts that arise from accidents, incidents, or other non-conformance, including corrective and preventive action;
- Where mitigation is necessary, conducting a health and safety risk assessment and significance evaluation of the environmental aspects of the proposed corrective and preventive action(s) to determine appropriateness and effectiveness; and
- Implementing, recording, and communicating changes arising from the corrective and preventive action, e.g., changes in operational controls.

SECTION 14.0 - RECORDS AND RECORDS MANAGEMENT

Prodigy maintains and preserves internal and external records that are critical to design and performance of the EHS Management System. These records include:

- Employee training records;
- Inspection reports;
- Management of change checklists and outcomes;
- Consultation reports;
- Accident, incident, and non-conformance reports and follow-up corrective and preventive action reports;
- Medical test reports (medical test reports and health surveillance reports might be considered confidential);
- Health surveillance reports;
- Cases of occupational disease and compensation claims;
- Audits and assurances;
- Management reviews;
- Other reviews;
- Environmental aspect evaluations;
- Emissions measurements;
- Exposure measurement records;
- Hazard identification, risk assessment and risk control records; and
- Government reports.

SECTION 15.0 - AUDITING, REVIEW, AND UPDATE

Prodigy conducts internal audits to determine the degree of implementation and to verify performance of the EHS Management System. Management and labour representatives may undertake audits. The results of audit(s) and management review(s) form the basis for the annual written statement of assurance by management on effectiveness of the EHS Management System.

Annually, management submits to the Chief Operating Officer a written statement of assurance as to effectiveness of the EHS Management System.

SECTION 16.0 - MANAGEMENT REVIEW

Senior management reviews the EHS Management System to determine its continued suitability, adequacy, and effectiveness. Outcomes of a management review include recommendations to revise Prodigy's supporting policies, to revise established objectives and

targets, and to specify corrective actions for individual management with target dates for completion.