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|  | Safe Work Practice                        |                                             |
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| Issue Date: September 3 <sup>rd</sup> 2026                                        | Supersedes: N/A                           | Review Date: September 3 <sup>rd</sup> 2026 |
| Written By: Rod Schneider                                                         |                                           | Position: Program Writer                    |
| Reason for Change: HSE-MS Updates                                                 |                                           |                                             |

## PURPOSE

The purpose of this Safe Work Practice is to establish expectations for respectful, safe, and culturally appropriate conduct when employees and contractors perform work on or near Indigenous lands, within Indigenous communities, or where work activities may affect Indigenous Peoples, culturally significant areas, traditional land use, or heritage resources.

## SCOPE & BOUNDARIES

This program applies to all employees or contractors performing work on behalf of Connect Energy Services.

## RESPONSIBILITIES

| ROLE             | RESPONSIBILITIES                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Program Owner    | <ul style="list-style-type: none"> <li>Ensure the program is approved every three years or when changes occur.</li> <li>Ensure updates affecting the program are communicated, and ensure associated documentation and training are up to date.</li> </ul>                                                                                                                                                                                  |
| Senior Manager   | <ul style="list-style-type: none"> <li>Accountable for program compliance.</li> <li>Ensure appropriate resources are available to meet project-specific Indigenous requirements.</li> <li>Ensure company commitments made to Indigenous communities or clients are communicated to affected personnel.</li> <li>Designate authorized representatives for formal community or Indigenous relations communications where required.</li> </ul> |
| Middle Manager   | <ul style="list-style-type: none"> <li>Lead implementation of the program in conjunction with supervisors.</li> <li>Identify applicable client, project, Nation, community, access, cultural, or heritage requirements before work begins.</li> <li>Coordinate required cultural awareness or community-specific training.</li> </ul>                                                                                                       |
| Field Supervisor | <ul style="list-style-type: none"> <li>Ensure workers comply with this program.</li> <li>Communicate restricted areas, access requirements, community expectations, environmental or cultural sensitivities, and reporting requirements before work begins.</li> <li>Immediately address inappropriate conduct or potential impacts to culturally significant areas or resources.</li> </ul>                                                |
| Workers          | <ul style="list-style-type: none"> <li>Ensure this program is followed.</li> <li>Treat Indigenous Peoples and communities respectfully.</li> <li>Remain within authorized work areas.</li> <li>Immediately report concerns, unexpected cultural or heritage discoveries, or potential impacts to culturally significant areas.</li> </ul>                                                                                                   |

## Policy

Connect Energy Services is committed to conducting business in a manner that respects the rights, cultures, traditions, and interests of Indigenous Peoples. Connect Energy Services recognizes the historical and ongoing relationship between Indigenous Peoples and the lands on which work is performed, and is committed to building and maintaining respectful, honest, and collaborative relationships with Indigenous communities, Nations, and individuals.

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Discriminatory, disrespectful, or culturally inappropriate conduct toward Indigenous Peoples, including racist remarks, stereotyping, or harassment, will not be tolerated by any employee, subcontractor, third-party contractor, client, stakeholder, or member of the public, and will be addressed in accordance with the Workplace Harassment and Violence Prevention program and the Health and Safety Enforcement and Discipline program.

Where a project or client agreement, Impact Benefit Agreement, Traditional Land Use study, protocol agreement, or community requirement establishes specific obligations related to Indigenous engagement, employment, cultural protocols, or environmental protection, those requirements shall be identified, communicated to affected workers, and followed in addition to the requirements of this Safe Work Practice. Where a community or client requirement is more comprehensive, the more protective requirement shall be followed.

This Safe Work Practice shall not take precedence over any legislated standard, rule, or regulation under the Occupational Health and Safety Act, Regulation and Code, or any other applicable legislative standard. This Safe Work Practice was developed in accordance with the standard(s) set forth by the Alberta Occupational Health and Safety Act, Code and Regulations, the Alberta Human Rights Act, the Canadian Human Rights Act, the Alberta Historical Resources Act, Section 35 of the Constitution Act, 1982, and Industry Best Practices. All workers are to be familiar with any applicable legislation, community protocols, and client or project-specific requirements.

### Legislation

Alberta Occupational Health and Safety Act, Regulation and Code  
 Alberta Human Rights Act  
 Canadian Human Rights Act  
 Alberta Historical Resources Act  
 Constitution Act, 1982 – Section 35 (Existing Aboriginal and Treaty Rights)  
 Métis Settlements Act (Alberta), where applicable  
 United Nations Declaration on the Rights of Indigenous Peoples Act (federal)

### Training

Employees or contractors performing work on behalf of Connect Energy Services will be trained through the new hire orientation process and as needed, through in-house or third-party facilitated training.

### Cultural Awareness and Respectful Conduct

All workers are expected to conduct themselves in a professional, respectful, and non-discriminatory manner when working on or near Indigenous lands, or when interacting with Indigenous Peoples and communities, and are to:

- Treat Indigenous Peoples, Elders, Knowledge Keepers, community leaders, and community members with dignity and respect.
- Use respectful and appropriate terminology, and refer to a specific Indigenous Nation or community by its proper name whenever known.
- Recognize and respect the distinct cultures, languages, traditions, and protocols of the Indigenous Nations, communities, and individuals in the area of work.
- Ask, rather than assume, when uncertain about appropriate conduct, protocol, or terminology, and direct questions on Indigenous rights, consultation, treaties, or land claims to management or the designated project representative.
- Seek authorization before handling, photographing, or recording ceremonial, cultural, or sacred items, community members, or sensitive locations.

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### Working On or Near Indigenous Lands and Communities

Before and during work performed on or near Indigenous lands, reserves, Métis Settlements, traditional-use areas, or within Indigenous communities, supervision is to confirm applicable requirements, which may include site or community orientation, sign-in/sign-out, permits, or escort requirements. Workers are to:

- Confirm required access permissions, permits, agreements, or community approvals are in place before mobilizing to site.
- Follow community-specific protocols for site access, working hours, communication, security, and conduct, including any restricted roads, areas, or hours of access.
- Follow the direction of the designated community liaison, cultural monitor, or point of contact where one has been assigned.
- Stay within the approved roads, trails, access routes, and work areas defined for the job.
- Follow posted speed limits and minimize noise, dust, lighting, and other disturbances in accordance with environmental and wildlife protection requirements.
- Maintain good housekeeping and remove waste generated by work activities.
- Respect restrictions on hunting, fishing, trapping, gathering, firearms, and removal of plants, animals, or materials from the land.
- Comply with Connect Energy Services' Alcohol and Drug Work Rule; alcohol, cannabis, and drugs are prohibited on or near Indigenous lands and within Indigenous communities unless expressly authorized.
- Direct all media, public, or community inquiries to management.
- Report concerns, conflicts, or incidents involving community members to the supervisor or management immediately.

If work activity could interfere with a ceremony, harvest, or other traditional or cultural activity in progress, maintain separation, pause or adjust the work as needed, and contact supervision for direction.

### Traditional Land Use, Culturally Significant Areas, and Heritage Resources

Traditional Land Use (TLU) studies, environmental assessments, and community consultation may identify culturally or spiritually significant areas, such as burial or ceremonial sites, traditional gathering and harvesting areas, trails and travel routes, archaeological or historical sites, and cabins, camps, or traditional-use structures. Workers are to:

- Flag, mark, and preserve known culturally significant areas identified through a Traditional Land Use study, hazard assessment, or client/community requirement.
- Follow the Hazard Assessment, Elimination, and Control program and the Ground Disturbance and Excavation program alongside this Safe Work Practice when work is planned near a known or suspected culturally significant area.
- Obtain documented authorization before any ground disturbance, vegetation clearing, or construction occurs within an identified culturally significant area.
- Comply with any buffers, exclusion zones, or protective measures established for a sensitive area.

### Chance Discoveries

Ground disturbance and other field activities can uncover previously unidentified heritage resources, such as human remains, bones, worked stone or pottery, historic structures, cultural depressions, modified trees, or ceremonial items. If a suspected discovery is made:

- Stop working in the immediate area and leave the discovery untouched and in place.
- Secure and mark the area to prevent further disturbance, and restrict access.

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- Notify the supervisor and management immediately.
- Report – management notifies the client, the applicable Indigenous community or Nation, and Alberta Culture and Status of Women (or applicable regulatory authority), as required under the Alberta Historical Resources Act.
- Human remains – management also notifies local law enforcement (RCMP) and follows the direction of the appropriate authorities.
- Resume work only once authorization is received from the appropriate regulatory authority, client, and/or Indigenous community.

All chance discoveries are to be documented and retained as part of the project records.

### Engagement, Commitments, and Reporting

Some projects include commitments relating to Indigenous employment, procurement, training, community investment, environmental monitoring, traditional land use, or access. Management identifies and communicates any commitments that affect Connect Energy Services' work. Workers are to comply with requirements applicable to their role, and refer any community requests regarding employment, procurement, compensation, access, consultation, or other project commitments to management, the client, or the Indigenous relations representative. Workers are expected to promptly report:

- Disrespectful, discriminatory, or inappropriate conduct.
- Unauthorized access to restricted areas, or damage to a culturally significant area.
- Archaeological, historical, or cultural discoveries.
- Interference with traditional land-use activities, or environmental releases affecting community lands or resources.
- Concerns raised by an Indigenous community member or representative, or a potential breach of a client, project, or community requirement.

Reports are to be made to the field supervisor or management. Concerns involving harassment, discrimination, violence, or retaliation are managed in accordance with the Workplace Harassment and Violence Prevention program. Workers who raise concerns in good faith will not be disciplined or subject to retaliation.

### Records

All records related to Indigenous engagement, community agreements, chance discoveries, cultural awareness training, and related communications will be maintained for a minimum of three (3) years, or longer where required by legislation, client requirements, or community agreement.

### Definitions

**Chance Discovery / Chance Find** – The unplanned encounter of a suspected historical resource, artifact, burial site, or human remains during work activities.

**Cultural Monitor** – An individual, often designated by an Indigenous community or Nation, who observes work activities to help identify and protect culturally or spiritually significant resources.

**Elder** – A respected member of an Indigenous community recognized for their knowledge, wisdom, and cultural teachings.

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**Heritage Resource** – A work of nature or of humans that is primarily of value for its palaeontological, archaeological, prehistoric, historic, cultural, natural, scientific, or aesthetic interest, as defined under the Alberta Historical Resources Act.

**Indigenous Lands** – Lands including, but not limited to, reserve lands, Métis Settlement lands, treaty lands, and traditional territories used or occupied by Indigenous Peoples.

**Indigenous Peoples** – First Nations, Métis, and Inuit peoples of Canada, including their communities, Nations, and individual members.

**Traditional Land Use (TLU)** – The use of land and resources by Indigenous Peoples for traditional, cultural, spiritual, or subsistence purposes, including hunting, fishing, trapping, gathering, and ceremonial activities.

**Work Site** - The location or area where work/tasks will be conducted or performed.

**Worker** - A person who is employed or engaged by the company to provide a service to the company, and includes all employees, independent contractors, staff, operators, managers, and supervisors.