

SaskPower Environment Incident Reference Chart for Employees and Contractors

Revision Date: March 2024

An incident is: A) an occurrence that did, or could have, resulted in damage, environmental impact or loss, and/or B) an occurrence that caused a breach of corporate policy, legislation or other requirement.

- This reference chart is intended to serve as a minimum standard and it is expected there will be some exceptions and/or modifications based on situational circumstances. You should use your judgement when classifying incidents. If you need assistance, contact your Environment Contact. Timelines are based on calendar days unless otherwised specified.

 Refer to SaskPower's Fit for Duty Policy for information regarding criteria for post-incident testing.

 If there are safety concerns associated with the incident refer to SaskPower Health & Safety Incident Reference Chart for Employee, Contractor and Public Safety Incidents.

Environment 24-hour Line 306-566-6200

| MINOD INCIDENT | CICNIEICANT INCIDENT | MA IOD INCIDENT | |
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| (Multiple occurrences may constitute a higher risk incident) | (Multiple occurrences may constitute a higher risk incident) | (Multiple occurrences may constitute a higher risk incident) | CRITICAL INCIDENT |
| Adverse Effects Unlikely to cause adverse environmental effects. These may include: Releases localized to a small surface area on the site or right-ofway Releases into secondary containment Release that occurred over a short period of time and can be easily remediated Unexpected death of fish or release of sediment with minimal impacts where all applicable procedures and mitigations were applied | Adverse Effects Some adverse effects limited to the local environment (public or private property) and/or moderate adverse effects to SaskPower owned property. These may include: Localized impacts to soil, groundwater, or surface water extending off site or off the right-of-way Isolated releases in close proximity to (but not impacting) sensitive areas, such as a wetland, native prairie, or sandhills Non-compliance with permit conditions that do not result in environment impacts Release of sediment with minimal impacts where procedures were not followed or mitigations were not applied Death of fish where procedures were not followed or mitigations were not adversed and that was not a direct result of a release Non-compliance with legislation, permit or procedure resulting in: Injury, harm or killing of Protected Wildlife (excluding Threatened or Endangered Species) Destruction or observable damage to wildlife habitat Ambient air quality exceeds standards for a short period of time (less than 24) | Adverse Effects Moderate to high adverse effects to the local environment (public or private property) and/or extreme adverse effects to SaskPower-owned property. These may include: Widespread impacts to soil, groundwater or surface water in multiple locations on or off site or off the right-of-way Impacts to sensitive areas such as native prairie or sandhills that can be remediated Unexpected large visible fish deaths Any releases to fish bearing water directly resulting in death of fish Non-compliance with legislation, permit or procedure resulting in: Injury, harm or killing of multiple Protected Wildlife Injury, harm or killing of one wildlife (including fish) designated as Threatened or Endangered Species Observable damage to Critical Habitat of wildlife (including fish) designated as Threatened or Endangered Species Ambient air quality exceeds standards for a long period of time (greater than 24 hours) and SaskPower was a confirmed contributor | Adverse Effects Extreme adverse effects to the environment (public or private property) and/or SaskPower-owned property, or violation of protection measures resulting in harm to the environment. These may include: Regional impacts to soil, groundwater or surface water observed offsite of the incident location and involving several locations or a very large area and multiple stakeholders Impacts in a sensitive area that causes irreversible impacts and requiring extensive or long-term remediation and/or monitoring Non-compliance with legislation, permit or procedure resulting in: Injury, harm or killing of more than one wildlife (including fish) designated as Threatened or Endangered Species Irreversible destruction to Critical Habitat of wildlife (including fish) designated as Threatened or Endangered Species |
| Financial Implications • Associated financial implications less than \$25,000 Regulatory/Non-Compliance • Low potential for regulator interest • Regulated or non-regulated incident with low impact • No risk of regulatory enforcement | hours) and SaskPower was a confirmed contributor Financial Implications Associated financial implications greater than \$25,000 and less than \$100,000 (include costs for spill response, remediation and additional costs to stop work) Regulatory/Non-Compliance Potential for regulator interest Regulated or non-regulated incident with some impact Low risk of regulatory enforcement | Financial Implications Associated financial implications greater than \$100,000 and less than \$1M (include costs for spill response, remediation and additional costs to stop work) Regulatory/Non-Compliance If a Notice of Violation or Letter of Non-Compliance is issued, the incident is classified Major at a minimum. Potential for regulator action Complaints to/concerns from regulators/authorities | Financial Implications Associated financial implications greater than \$1M (include costs for spill response, remediation and additional costs to stop work) Regulatory/Non-Compliance Potential for severe regulatory discipline arising from non-compliance with an authorization or legislation Investigation from a regulator with a potential for summary conviction or indictment Occurrence or potential occurrence of operating under conditions of an expired regulatory approval |
| Reputation No impact to SaskPower's public reputation Near Miss Avoided incident that would have resulted in a minor incident as defined above | Reputation Low impact to SaskPower's public reputation Complaints to the company or second-hand knowledge of public concern Near Miss Avoided incident that would have resulted in a significant incident as defined above | Potential for an external investigation with a possibility that a warning letter/notice of violation will be issued Reputation Medium impact to SaskPower's public reputation Potential for negative local or regional media attention Near Miss Avoided incident that would have resulted in a major incident as defined above | Reputation • High impact to SaskPower's public reputation • Potential for negative national or international media attention Near Miss Avoided incident that would have resulted in a critical incident as defined above |
| Antifreeze spilled on the floor of a SaskPower vehicle maintenance garage A non-regulated release of oil in a non-sensitive area Gasoline spilled and contained within secondary containment Rutting (where there is mixing of topsoil and subsoil) or equipment getting stuck in non-sensitive areas such as cultivation, developed road allowance or industrial site where there is no violation of a permit Delayed reporting of an unexpected discovery of an archaeological site along the right-of-way Fish mortality observed during dewatering for maintenance shutdown despite BMPs followed and fish salvage Sediment release with no measurable change to surface water quality | Unintentional disturbance or destruction of a robin's nest (with juvenile birds or eggs) where there is no violation of a permit and where procedures were followed (e.g. a nest sweep was completed but the nest was missed) A permit non-compliance which resulted in no environment impact (e.g., Permit required an environmental monitor on site; however, environmental monitor was not present for work. Work was completed with no environmental impacts) A spill to secondary containment where spill response and remediation is expected to cost greater than \$25,000 and less than \$100,000 Procedural error during a maintenance dewatering at a hydro station resulting in slightly higher fish mortality than past precedent Sediment release with measurable change to surface water quality due to improperly installed silt fence | Rutting or surface disturbance (e.g. sod displacement) in native prairie that can be repaired or reclaimed Preventable destruction of: an active robin's nest without a permit an inactive hawk nest without a permit pileated woodpecker nest cavity in a power pole without a permit Release of a wood treatment preservative causing soil and surface water contamination over a large residential area Letter of Non-Compliance issued due to work being done within the bed, bank, or boundary of a water body without the proper permit Impacting a known archaeological site Large visible fish kills due to thermal effects or entrainment Sediment release resulting in death of fish or notable destrubtion of habitat | A release to a water body (non-fish bearing or fish bearing) with the potential for extreme or extensive impacts (e.g. impacts to drinking water or aquatic species or habitat) Irreversible Rutting (i.e. mixture of topsoil and subsurface soil) resulting in damage to native prairie Ploughing a line through a burrowing owl burrow Destruction of a bank swallow colony on a soil pile at a construction site A permit violation which resulted in environment impact that meets the criteria described above (e.g., Operating a facility under the conditions of an expired permit) |
| Refer to the Spill Response Procedures applicable to your business area. Contact your Environment Contact for support, as required. | Refer to the Spill Response Procedures applicable to your business area. Contact your Environment Contact for support, as required. | Refer to the Spill Response Procedures applicable to your business area. Contact your Environment Contact for support, as required. | Refer to the Spill Response Procedures applicable to your business area. Contact your Environment Contact for support, as required. |
| Communicate as per Spill Response Procedures. In addition: Employee or Contractor shall Notify: Direct Supervisor/ O/S Manager Contract Owner Supervisor/ O/S Manager shall Notify: Project Manager (if applicable) Environment Contact Properties (when damage to building property) Enterprise Security (when breaches of security) Automatic Notification sent to: Insurance@saskpower.com IncidentsEnv@saskpower.com | Communicate as per Spill Response Procedures. In addition: Employee or Contractor shall Notify: Direct Supervisor/ O/S Manager Contract Owner Supervisor/ O/S Manager shall Notify: Project Manager (if applicable) Environment Contact Properties (when damage to building property) Enterprise Security (when breaches of security) Automatic Notification sent to: Insurance@saskpower.com IncidentsEnv@saskpower.com | Communicate as per Spill Response Procedures. In addition: Employee or Contractor shall Notify: • Direct Supervisor/ O/S Manager • Contract Owner Supervisor/ O/S Manager shall Notify: • Environment Contact • Properties (when damage to building property) • Enterprise Security (when breaches of security) O/S Manager shall Notify: • Department Director • Project Manager (if applicable) O/S Manager shall Coordinate (if requested by VPs): • A phone call with appropriate VPs and Directors Director shall Notify: • Department Director shall Notify: • Department Services shall notify: • Legal Counsel, Law, Land and Privacy • Incident Owner • Director, Environment • EVP Legal and Corporate Services and General Counsel • Department VP and/or EVP • Director, Internal Audit • Senior Auditor (EHS), Internal Audit • Manager of Risk Management & Insurance • Other departments as required Automatic Notification sent to: • Insurance@saskpower.com • IncidentsEnv@saskpower.com • Legal@saskpower.com | Communicate as per Spill Response Procedures. In addition: Employee or Contractor shall Notify: Direct Supervisor/ O/S Manager Contract Owner Report incident to 306-566-6200 Supervisor/ O/S Manager shall Notify: Environment Contact Properties (when damage to building property) Enterprise Security (when breaches of security) Director, Environment Corporate Services and General Counsel EVP People, Safety & Corporate Relations* Director of Corporate Relations & Communications Director of Safety Director of Safety Director, Internal Audit Senior Auditor (EHS), Internal Audit Senior Auditor (EHS), Internal Audit Manager of Risk Management & Insurance Legal Counsel, Law, Land and Privacy Incident Owner O/S Manager shall Coordinate: A phone call with President & CEO and appropriate EVPs/VPs and Directors President & CEO shall Notify: Safety, Environment and Corporate Responsibility Committee and Board Chair (as appropriate) Automatic Notification sent to: Insurance@saskpower.com |
| | Adverse Effects Unlikely to cause adverse environmental effects. These may include: Releases localized to a small surface area on the site or right-of-way Releases into secondary containment Releases that occurred over a short period of time and can be easily remediated Unexpected death of fish or release of sediment with minimal impacts where all applicable procedures and mitigations were applied Financial Implications Associated financial implications less than \$25,000 Regulatory/Non-Compliance Low potential for regulator interest Regulated or non-regulated incident with low impact No risk of regulatory enforcement Reputation No impact to SaskPower's public reputation Near Miss Avoided incident that would have resulted in a minor incident as defined above Antifreeze spilled on the floor of a SaskPower vehicle maintenance garage A non-regulated release of oil in a non-sensitive area Gasoline spilled and contained within secondary containment Rutting (where there is mixing of topsoil and subsoil) or equipment getting stuck in non-sensitive areas such as cultivation, developed road allowance or industrial site where there is no violation of a permit Delayed reporting of an unexpected discovery of an archaeological site along the right-of-way Fish mortality observed during dewatering for maintenance shutdown despite BMPs followed and fish salvage Sediment release with no measurable change to surface water quality Refer to the Spill Response Procedures applicable to your business area. Contact your Environment Contact for support, as required. Communicate as per Spill Response Procedures. In addition: Employee or Contractor shall Notify: Direct Supervisor/ O/S Manager Contract Owner Supervisor/ O/S Manager shall Notify: Project Manager (if applicable) Environment Contact Properties (when damage to building property) Enterprise Security (when breaches of security) Automatic Notification sent to: Insurance@saskpower.com | Advance Efficial - Unlayed to cause and exercise environmental effects. These may include: - Releases into secondary containment - Releases that occurred over a short period of time and can be easily remediated - Unexpected death of fish or release of sadiment with minimal impossibilities and the season of the season o | Activate sources was controlled inflored. The control of the contr |



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| | MINOR INCIDENT (Multiple occurrences may constitute a higher risk incident) | SIGNIFICANT INCIDENT (Multiple occurrences may constitute a higher risk incident) | MAJOR INCIDENT (Multiple occurrences may constitute a higher risk incident) | CRITICAL INCIDENT | | |
| INVESTIGATE & REPORT | Incident entered in ESMIS - Next business day Incident verified by Environment Specialist - Next business day Incident investigated and closed in ESMIS by the Supervisor/ O/S Manager – 21 Days Incident report in ESMIS includes at least one root cause and at least one corrective action Optional incident bulletins distributed by Supervisor/ O/S Manager if there is valuable information to be shared | Incident entered in ESMIS – Next business day Incident verified by Environment Specialist – Next business day Incident investigated and closed in ESMIS by the Supervisor/ O/S Manager - 21 Days Incident report in ESMIS includes at least one root cause and at least one corrective action Optional incident bulletins distributed by Supervisor/ O/S Manager if there is valuable information to be shared | Incident entered in ESMIS - Next business day Incident verified by Environment Specialist - Next business day Lead Investigator assigned from Environment for both employee and contractor incidents A parallel contractor investigation is required for contractor incidents Formal investigation report required and must include at least one corrective action for each root cause identified (draft report – 45 days; closure of the investigation – 90 days) Incident Owner must review and approve investigation report, participate in development of corrective actions, and approve closure of the investigation after all corrective actions are complete. Incident bulletins distributed by Environment | Incident entered in ESMIS - 8 hours Incident verified by Environment Specialist - Next business day Lead Investigator assigned from Environment for both employee and contractor incidents A parallel contractor investigation is required for contractor incidents Incident Owner (with support of Lead Investigator) must present an Information Item to Safety, Environment and Corporate Responsibility Committee at the next scheduled meeting Formal investigation report required and must include at least one corrective action for each root cause identified as well as consideration for a recommendation that addresses systemic issues (draft report – 45 days; closure of the investigation – 90 days) Incident Owner must review and approve investigation report, participate in development of corrective actions, and approve closure of the investigation after all corrective actions are complete. Incident bulletins distributed by Environment | | |

Notes:

Contract Owner - The person designated by SaskPower to managers, contract of the contract of the following roles: contract administrators, contract requisitioners, project managers, contract specialists, construction managers, procurement buyers/purchasing agents and any designates that are representing SaskPower with the contractor.

Endangered Species – A species listed as "Endangered" under Schedule 1 of the Species at Risk Act.

Protected Wildlife – Includes migratory birds included in Article 1 of the Migratory Birds Convention Act, species listed as Special Concern in Schedule 1 of the Species at Risk Act and any species protected by the provincial The Wildlife Act.

Rutting - If there has been mixing of topsoil with subsoil by heavy equipment or vehicle traffic, then it should be considered a rutting incident.

Threatened Species – A species listed as "Threatened" under Schedule 1 of the Species at Risk Act.

Critical Habitat – The habitat that is necessary for the survival or recovery of a Threatened or Endangered wildlife species and that is identified as the species' critical habitat in the federal recovery strategy or in an action plan for the species as per the Species at Risk Act.