


| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

Terra Gen, LLC Contractor Environmental Health & Safety Policy

Purpose and Scope

Terra-Gen, LLC, and affiliates (“Terra-Gen” or the “Company”) is a leading renewable energy developer and operator of wind, solar, and energy storage facilities in the United States.

Contractors and other third parties doing work on the company’s behalf impacts its operations and reputation. It is essential that work is performed consistently and compatibly with the company’s policies and business objectives. The Contractor Environmental Health & Safety Policy sets the minimum environmental, health, and safety (EH&S) requirements for contractors from initial EH&S review through performance of the contracted scope of work.

The policy covers Environmental, Health, and Safety requirements. It applies to all Terra-Gen contractors and their subcontractors at Sites and offices in the care and custody of Terra-Gen and provides the minimum standards that are required at sites in the care and custody of Terra-Gen contractors.

Exclusions: This policy does not apply to:

| Topic | Document Reference |
|---|--|
| Contractors are excluded from program requirements who are: | <ul style="list-style-type: none"> ● Not performing work on a Terra-Gen owned or operated site. ● Working at sites not owned by Terra-Gen. ● Contractors working and present exclusively in administrative areas of sites (note: aspects of Section 5 still apply). |
| Delivery Firms | <ul style="list-style-type: none"> ● Package or equipment delivery drivers, except for bulk chemical and/or bulk oil delivery personnel, are exempt from this policy (note: aspects of Section 5 still apply). |


| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

TABLE OF CONTENTS

| | |
|---|-----------|
| 1. References | 2 |
| 2. Roles and Responsibilities | 2 |
| 3. Definitions | 4 |
| 4. General Requirements | 5 |
| 5. Reporting | 9 |
| 6. Training Requirements | 11 |
| 7. Recordkeeping Requirements | 11 |
| 8. Program Review History | 12 |
| 9. Approval | 13 |
| 10. Attachments: | 14 |
| Attachment 1: Risk Matrix | 15 |
| Attachment 2: Contractor Orientation EH&S Minimum Requirements | 17 |
| Attachment 3: Contractor EH&S Orientation Acknowledgement Form | 20 |

1. References

1.1 California Department of Public Relations (DOSH)

- Developing Your Workplace Injury & Illness Prevention Program Guidance Document/Publication; [Developing Your Workplace \(ca.gov\)](http://www.dir.ca.gov/DevelopingYourWorkplace.htm)

1.2 Occupational Safety and Health Administration (OSHA)

- Standard Number 1926.16 - Rules of Construction


1.3 Approved American National Standard (ANSI) / National Contract Management Association (NCMA)

- The Contract Management Standard Guidance Document, ASD 1-2019 (R2022) Third Edition; [ANSI-NCMA ASD 1-2019 \(R2022\).pdf \(ncmahq.org\)](http://www.ncmahq.org/ANSI-NCMA-ASD-1-2019-R2022.pdf)


2. Roles and Responsibilities

This section delineates the roles, duties, and obligations of various stakeholders regarding the policy. It specifies who is responsible for implementing, enforcing, monitoring, and reviewing compliance with the policy.

- The **Chief Environment Health and Safety Officer** shall be responsible for overall health and safety programs and compliance.


| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

- The **Director of Health, Safety, and Environmental Compliance** shall be responsible for program oversight including program development, review, effectiveness, and compliance.
- The **Environmental and Health & Safety Specialists/Coordinators** are responsible for reviewing contractor’s Injury Illness Prevention Plan (IIPP) and/or EH&S Plan, other EH&S programs/plans and EH&S performance (pre-award and ongoing), conducting investigations, reviewing contractor investigation reports and performing contractor field audits.
- The **contract owner** is the Terra-Gen employee responsible for the overall pre-award and contract negotiation process, including risk categorization and initiating/requesting an evaluation of the contractor in consultation with an EH&S representative(s). This person provides a scope of work to be performed by the contractor to the Environmental and Health & Safety specialists/coordinators as part of the contractor evaluation process. This person is typically responsible for overseeing procurement and contracting processes and maintaining the budget. In competitive bid situations, they ensure EH&S capabilities are evaluated to guide contractor selection and negotiate EH&S contract terms.
 - **Examples:** VP Project Development, Project Director, Site Manager, VP Engineering and Pre-Construction, Director of Project Engineering, VP of Energy Storage, Commercial Director
- The **field management lead** is the designated Terra-Gen employee responsible for confirming that on-site contractor personnel are performing work in line with EH&S requirements. This person regularly inspects the on-going work at the site. The person works with the contractor to identify the contractor’s lead EH&S representatives. The person shall ensure that all contractor personnel receive the required site-specific EH&S orientation before work commences. The field management lead shall ensure that electronic copies of all completed acknowledgement forms and/or digital acknowledgments are submitted to ehsadmin@terra-gen.com
 - **Examples:** Construction Manager, Project Supervisor, Assistant Project Manager, Operations/Site Supervisor, Site Manager
- The **Contractor** is responsible for initiating, managing, and supervising the work performed on Terra-Gen sites, maintaining their EH&S programs and ensuring their workers are trained, qualified and certified for the services provided. They must comply with their Injury Illness Prevention Program (IIPP) and/or EH&S Plan, the requirements of the contract, all applicable EH&S laws and regulations, and perform work in accordance with applicable EH&S permits. They must also regularly evaluate subcontractors' ability to meet the requirements of this policy.

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

3. Definitions

| Word/Phrase | Definition |
|-------------------------------------|--|
| Bulk Delivery | The delivery of a product by tanker direct to the end user. |
| Contractor | A business or entity that agrees to perform work under the terms of a contract. |
| Environment | Any surface water, ground water, drinking water supply, land surface, subsurface, ambient surface, or ambient air within the United States. |
| Environmental Clearance Survey | Biological, cultural, and/or paleontological surveys that are performed by Qualified Professionals to identify and mitigate any potential harm to animals, sensitive habitats, archaeological sites, or fossil remains before any ground-disturbing, vegetation-clearing, or infestation-control activities (including mowing, vegetation removal, and the application of herbicides, pesticides, or other chemicals). Environmental clearances ensure that Project permits and regulations are followed while protecting important resources. |
| Generator | Any person, business, or facility whose act or process produces hazardous waste. Generators must manage waste according to federal and state rules. |
| Habitat | The home or environment of an animal (i.e., nest, den, burrow, hive, cave, shell, etc.). |
| Hazardous material or substance | Material or substance (including waste) that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present, or potential hazard to human health and safety or to the environment if released into the workplace or the environment, or a material specified in an ordinance adopted by a local jurisdictional agency. |
| Hazardous Materials Inventory (HMI) | A detailed and up-to-date record of all hazardous materials stored or used at a site, including the chemical name, quantity on hand, container size, storage location, and associated safety data sheets (SDS). |
| Hazardous Waste | A waste that exhibits hazardous characteristics (ignitability, corrosivity, reactivity, or toxicity) or is listed under RCRA (40 CFR 261) and/or California Title 22 regulations. |
| High-risk | An identified concern, that without mitigation, is likely to cause substantial injury or loss. |
| Medium-risk | An identified concern, that without mitigation, is likely to cause minor injury or loss. |
| Low-risk | An identified concern, that without mitigation, may result in harm. The risk of harm is neither imminent nor likely to occur. |

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |


| Word/Phrase | Definition |
|--|--|
| Qualified Applicator | An individual holding a valid Qualified Applicator License (QAL) or Qualified Applicator Certificate (QAC) issued by the appropriate state regulatory agency for the jurisdiction in which the site is being treated and must comply with all applicable state and federal regulations. |
| Recordable Injury | An event or exposure in the workplace that results in record keeping requirements of OSHA such as medical event, days away from work, restricted/transferred work, and death. |
| Non-Recordable Injury | An event that does not meet the recordkeeping requirements of OSHA such as first aid. |
| Release or Threatened Release | Release or threatened release of a hazardous material by way of any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including airborne releases, unless permitted or authorized by a regulatory agency. |
| Reportable Release or Threatened Release | Any time a hazardous material or substance that exceeds local, state, or federal reporting requirements is released, or is threatened to be released, to the environment. |
| Non-Reportable Release | The release of a hazardous material or substance that does not require reporting to regulatory agencies. |
| Wildlife | Wild animals; the native fauna of a region (i.e., ravens, kit fox, desert tortoise, squirrels, owls, etc.). |

4. General Requirements

4.1 Contractors Evaluation: EH&S Risk Assessment and Review

Contractors must have the ability to manage the risks associated with the potential contracted work, ensuring they possess the necessary capability and capacity.

When requested, Contractors are required to provide EH&S documentation relevant to their scope of work, which will undergo a EH&S review and evaluation process. Prior to engaging a Contractor to perform work at a Terra-Gen location, the contractor scope of work will be reviewed against **Attachment 1: Risk Matrix** to determine the risk level (High, Medium, Low). Contractors will be evaluated based on the highest risk activity they may perform under the potential contracted scope of work. If the risk level is determined to be high, then the Contractor will subscribe to Terra-Gen's contractor risk management platform for qualification and ongoing contractor management, unless a variance is granted.

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

Contractors performing high- and medium-risk work shall adhere to strict requirements to ensure all identified hazards are mitigated.

Contractors shall develop and implement an IIPP and/or an EH&S Plan in accordance with relevant industry standards and Terra-Gen’s Contractor EH&S Policy requirements. The Plan(s) shall comply with all applicable laws and incorporate best practices for addressing and mitigating all injuries and illnesses in the workplace.

4.2 EH&S Contractor Terms and Conditions

EH&S-related Terms & Conditions shall be incorporated into new contracts to comply with all relevant federal, state, and local laws and Terra-Gen requirements.

4.3 EH&S Monitoring and Compliance (Post Contract Award)

4.3.1 Reviews

During the performance of work, when requested, Contractors are required to provide EH&S documentation relevant to the Contractor and/or their scope of work, which will undergo a review. We retain the right to audit our Contractor’s activities to ensure they are in compliance with this policy. Contractors are required to close out audit deficiencies in a timely manner.

4.3.2 EH&S Review Meetings

Contractors will meet with Terra-Gen as requested. Contractors performing high-risk work will provide their EH&S performance metrics such as incidents and corrective actions, risk management and mitigation, and IIPP and/or EH&S Plan effectiveness as requested.

4.3.3 Terra-Gen’s EH&S Requirements


The Contractor is required to comply with Terra-Gen’s EH&S requirements as outlined in the contract. Contractors shall ensure any work activity associated with the contracted scope of work is in compliance with their IIPP and/or EH&S Plan.

4.3.4 Site Orientations

All contractor personnel shall be provided with a site-specific EH&S orientation prior to performing any onsite work. Contractor personnel will be provided with an updated orientation when policy or site conditions materially change. See **Attachment 2: Contractor Orientation EH&S Minimum Requirements** and **Attachment 3: Contractor EH&S Orientation Acknowledgement Form**.

4.3.5 Language Skills

All contractor personnel performing work at a Terra-Gen facility must be able to understand safety information and instructions relevant to their work.

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

Contractors are responsible for ensuring that their personnel can access and comprehend safety information, either directly or with appropriate support.

4.3.6 Personal Protective Equipment (PPE)

Contractors are required to provide and ensure the proper use of personal protective equipment (PPE) for their employees at no cost. PPE must meet applicable OSHA and ANSI standards and be appropriate for the hazards identified in the work scope. Contractors must train workers in its correct use, inspection and care.

4.3.7 Motor Vehicle Operation


Contractors and subcontractors performing work shall comply with all applicable federal, state, and local motor vehicle laws and operate vehicles in a safe and responsible manner on Terra-Gen sites. Contractors operating vehicles shall ensure vehicles are properly maintained, legally registered, and insured in accordance with contractual requirements. Drivers must hold a valid driver's license with endorsements for the type of vehicle operated, always use seat belts, follow speed limits and refrain from distracted driving, including the use of mobile devices except as permitted by project sites. Contractors shall not operate vehicles while impaired, fatigued, or under the influence of alcohol, drugs, or medications that may affect safe driving.

4.3.8 Permits and Clearances

Prior to work, the Contractor must also ensure that any additional permits, authorizations, and clearances needed to perform the scope of work have been obtained. This includes working with Terra-Gen's Environmental Compliance Specialists to determine whether an Environmental Clearance Survey is required, and, if so, the necessary permits and clearances are secured prior to work start.

Prior to initiating any ground-disturbing activities—including, but not limited to, vegetation clearing, grubbing, excavation, trenching, grading, drilling, or similar work—and before applying any pesticides or chemical treatments for infestation control or vegetation management, the Contractor shall review and comply with all applicable site- or project-specific plans and permit conditions. Where required, the project site shall be surveyed by qualified professionals and formally cleared to confirm the absence of biological, cultural, or paleontological resources.

Terra-Gen will verify that all necessary clearance surveys are conducted in compliance with regulatory requirements and conditions outlined in the project's site-specific permits. The Contractor will be provided with written approval to begin the work activity. Before beginning work activity each day, the Contractor

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |


must ensure that (if required) resource monitors are present to oversee the entire duration of ground-disturbing tasks.

4.3.9 Hazardous Materials and Waste

Contractors who use or store hazardous materials at the project/site must provide Terra-Gen's EH&S representative a complete Hazardous Materials Inventory (HMI), detailing all hazardous materials to be brought on site and their quantities. Contractors must also provide access to corresponding Safety Data Sheets (SDS) at least 48 hours before bringing any hazardous materials on-site. If additional hazardous materials are introduced later, an updated HMI and associated SDS must be submitted to Terra-Gen's EH&S representative no less than 48 hours before those new materials are brought on-site.

Contractors shall handle, store, use, and dispose of all hazardous materials and hazardous waste on project sites in full compliance with all applicable federal, state, and local environmental, health, and safety requirements. Contractors are responsible for verifying the following:

- **Safety Data Sheets (SDS):** All personnel have access to the current SDS for each hazardous material used or stored on the project site.
- **Tier II/Hazardous Materials Business Plans (HMBPs):** When applicable, site/project-specific HMBPs are submitted to the jurisdictional Certified Unified Program Agency (CUPA). Contractors must provide Terra-Gen's EH&S representative with a copy of their current HMBP and any subsequent updates to the jurisdictional CUPA within 48 hours of submittal.
- **Spill Prevention, Control, and Countermeasure (SPCC) Plans:** When applicable, site/project-specific SPCC Plans must be prepared, maintained, and implemented in accordance with applicable federal and state requirements. Contractors must provide Terra-Gen's EH&S representative with a copy of their current SPCC Plan and any subsequent revisions, amendments, or regulatory submittals within 48 hours of completion or submission.
- **Labeling and Storage:** All hazardous materials are properly labeled and stored in accordance with regulatory standards.
- **Training:** Personnel are trained in the relevant safe handling, use, and emergency response procedures associated with hazardous materials and hazardous waste.
- **Hazardous Waste Generator Requirements:** Only permitted Generators are authorized to accumulate hazardous waste on project sites. Contractors must provide Terra-Gen's EH&S representative with a copy of their EPA-issued Generator ID at least 48 hours prior to accumulating hazardous waste on any project site.

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

- Hazardous Waste Management:** Hazardous waste must be properly accumulated, containerized, labeled, manifested, and transported in full compliance with all applicable regulations, and must be disposed of through the Contractor’s appropriately licensed waste management vendors. Copies of all Contractor hazardous waste manifests generated under a Terra-Gen scope of work must be provided to Terra-Gen’s EH&S representative upon request.
- Herbicide, Pesticide, Chemical Application Requirements:** All herbicide or chemical vegetation control applications, and any pesticide applications beyond basic over-the-counter products, shall be performed by a Qualified Applicator.

4.3.10 Contractor Emergency Plan(s)

Contractor will develop emergency action plan(s) or rely on a Terra-Gen site-specific emergency plan. The emergency plan(s) shall comply with all applicable laws and incorporate best practices for addressing emergencies and emergency response. Contractor shall provide a copy of their emergency plan(s) prior to starting work or notify Terra-Gen they will rely on Terra-Gen's emergency plan(s).

5. Reporting

5.1 Incidents Reporting and Notifications

Except as noted in 5.2 and 5.3, the Contractor is responsible for making any required agency notifications. Certain incidents require timely notification and reporting by the Contractor to the appropriate regulatory agencies.


Contractors must notify Terra-Gen EH&S of any incidents, including accidents, injuries (including OSHA recordable and reportable), equipment or property damage, near misses, reportable hazardous material releases, discoveries of injured or dead wildlife, impacts to wildlife habitats, and findings of cultural or paleontological resources on the project site as soon as it is safe to do so. **Under no circumstances should Contractor delay incident notifications.**

5.2 Hazardous Materials Releases Notifications

Contractors with care, custody, and control of a Terra-Gen Project site are required to make the necessary agency notifications regarding any Reportable Releases of hazardous materials. Otherwise, Terra-Gen will make the necessary agency notifications.

5.3 Wildlife Notifications

Terra-Gen is responsible for notifying the appropriate agencies regarding any dead or injured wildlife, impacts to wildlife habitat, impacts to protected plant species and other biological resources, or discoveries of cultural or paleontological resources.

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

Contractors should not approach or directly handle wildlife or their habitat without first receiving approval from Terra-Gen. Qualified biologists have the expertise and credentials to accurately identify a species and their habitats and will be engaged. For injured wildlife, time is of the essence. Rehabilitation of injured wildlife may be possible.

5.4 EH&S Written Incident Reports

Contractors must submit copies of written initial incident reports and associated incident documentation to Terra-Gen’s EH&S representative within 24 hours of the reported incident. Contractors are responsible for performing their own investigation and provide a summary of the findings to their Terra-Gen EH&S representative within 14 days.

5.5 Environmental, Social and Governance (ESG) Reports

Terra-Gen is responsible for reporting certain data and information related to ESG to various stakeholders, such as investors, owners, and certain agencies. Examples of such data include, but are not limited to, OSHA recordable injuries or illnesses, contractor workforce demographics and metrics (e.g., number of contractors onsite – total and females, contractor hours worked, etc.), greenhouse gas emissions, environmental incidents (e.g., hazardous waste generated, water usage, and reportable incidents such as spills, fires, etc.). Contractors are expected to provide such data when requested.

5.6 Reporting Concerns

We actively work to create a culture where members of our supply chain are free to report actual or potential violations of this policy or any law or regulation. Contractor personnel are encouraged to report concerns or violations to their Terra-Gen representative or can also report on a confidential and anonymous basis.

5.7 How to Report a Concern


Terra-Gen treats any reported violation of this policy, related procedure, or applicable law seriously and respectfully. Confidentiality of reported violations will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and subject to requirements of applicable law.

Terra-Gen’s Reporting Hotline Phone Number and Online and Mobile Portals operated by NAVEX:

By phone: 1-833-407-9581

Via online portal: terra-gen.ethicspoint.com/

Via mobile device: terra-genmobile.ethicspoint.com

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

When making a report, please include as much detail as possible, including back-up documentation where feasible, to permit adequate investigation of the concern or conduct reported. Vague, non-specific, or unsupported allegations are inherently more difficult to pursue. However, we ask that personnel provide only factual information and details as they are known or suspected about the concern and avoid making any statements relating to whether the situation or actions are violations. The final determination will be made as part of our investigation.

5.8 Violation of this Policy

Terra-Gen has a zero-tolerance approach and maintains strict adherence to EH&S requirements. Failure to comply puts others at risk. We may terminate any Contractor who does not comply with this policy.

5.9 Non-Disclosure Requirements

Contractor personnel are strictly prohibited from externally disclosing any environmental health and safety matters related to Terra-Gen projects – including accidents, injuries, reportable incidents, wildlife, habitats, protected biological resources, cultural and paleontological resources, and hazardous material releases, unless required by law or regulation.

All media inquiries shall be directed to Terra-Gen’s Public Information Officer (PIO), who is responsible for handling communication with the media.

All complaints or inquiries from neighbors or other stakeholders (not related to the media) should be reported to Terra-Gen’s Liaison Officer.


6. Training Requirements

- All relevant Terra-Gen employees shall be provided with a copy of this policy and must complete training as a part of employee orientation, and refresher training, as assigned. Training delivery shall be provided through in-person, virtually or through Terra-Gen's learning management system.
- We provide our policy to our Contractors who perform work on-site at the outset of the establishment of our business relationships.
- Contractor shall verify all personnel have obtained all necessary training competencies before commencement of work tasks.
- All Contractor personnel must receive site-specific Contractor EH&S Orientation before performing any on-site activities.

7. Recordkeeping Requirements

All records related to compliance with this policy shall be maintained electronically.


Contractor records shall be maintained electronically, consistent with Terra-Gen’s record retention practices. Contractor records shall be retained for 5 years.

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

8. Program Review History


This policy will be reviewed by EH&S periodically to ensure compliance with all applicable standards and regulations. Any updates or revisions shall be documented, and previous versions archived.

| Review History | | | | |
|-----------------------|----------------------|-----------------------------|--|--|
| Version Number | Revision Date | Reviewer Name | Reviewer Title | Summary of Changes |
| 1 | 04/25/2012 | Mark Casper | VP, Environmental | New Policy (titled Contractor Safety) |
| 2 | 03/01/2026 | Amy Roth; Whitney Goller | Chief EHS Officer; Director of Health, Safety, & Environmental Compliance | Policy refresh, template change, expanded environmental requirements, expanded roles & responsibilities, added risk matrix, requirements for contractors performing high-risk work, changes to requirements for orientation, changes to orientation acknowledgement, added non-disclosure requirements, named changed to Contractor Environmental Health & Safety Policy |
| | | | | |
| | | | | |
| | | | | |

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

9. Approval

Permanent revisions to this policy shall require authorization by the Chief Environment Health & Safety Officer. There will be a 120-day period to transition to the new requirements in this policy following the date it is approved.


DocuSigned by:

 6288441D7E214C3...

03/01/2026

Amy Roth

Date Signed

Chief Environment Health & Safety Officer


| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

10. Attachments:

Attachment 1: Risk Matrix

Attachment 2: Contractor Orientation EH&S Minimum Requirements

Attachment 3: Contractor EH&S Orientation Acknowledgement Form

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

Attachment 1: Risk Matrix




Terra-Gen EHS Risk Matrix

INTERNAL DOCUMENT

Terra-Gen categorizes all work into High, Medium, and Low risk levels using this risk matrix.

| Risk | Low | Medium | High |
|---|-----|--------|------|
| Cranes/Lifts | | | X |
| Scaffold/Working At Heights | | | X |
| Confined Space | | | X |
| Electrical Work | | | X |
| Large Battery Installation/Storage/Repair | | | X |
| Operation Of Heavy Equipment | | | X |
| Ground Disturbance | | | X |
| Rotating Equipment Operation/Repair | | | X |
| Pressurized Gas/Liquids or Solids | | X | |
| Radiation | | X | |
| Routine Hot Work | | X | |
| Extreme Temperatures | | X | |
| Biological Hazards | | X | |
| Wildfire Exposure | | X | |
| Routine Equipment Maintenance | | X | |
| Powered Industrial Vehicle Operation | | X | |
| Light Vehicle Operation | X | | |
| Slip, Trip & Fall Hazards | X | | |
| Routine Building & Grounds Maintenance | X | | |
| Professional Service (on-site) | X | | |

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

Attachment 2: Contractor Orientation EH&S Minimum Requirements



Contractor EH&S Orientation Minimum Requirements
(Internal & External Use)

Instructions: For construction projects under the care and custody of contractors, the Contractor will ensure all of these items are included in their contractor orientation. For sites in the care and custody of Terra-Gen, every Contractor shall receive Terra-Gen's Contractor orientation, which must meet these minimum requirements.

1 Administration & Program Review

- Commitment to Environment, Health, & Safety
- Roles & Responsibilities (Site Supervisor, Site Manager, Foreman, EH&S, etc)
- Stop Work Authority (non-retaliation statement required)
- Drug, Alcohol, and Contraband Prohibitions
- Ethics Point – available to all contractors for reporting concerns (can be anonymously reported)
- Required attendance at safety meetings
- Orientation acknowledgment documentation (signature + retention requirements)

2 Site Access & General Site Rules

- Site access requirements (badging, sign-in/out)
- PPE requirements (minimum + task-specific)
- Housekeeping expectations
- Vehicle and equipment rules (speed limits, safety belts, parking, staging)
- Location of safety resources (SDS access, bulletin boards, emergency contacts)
- Prohibited items and behaviors

3 Emergency Response & Medical

- Emergency action/response plan overview
- Emergency reporting process (who to call first)
- Evacuation routes and muster locations
- First aid, AED, eyewash, fire extinguisher locations
- Severe weather procedures
- Incident reporting requirements (immediate reporting expectations)
- Post-Incident Requirements: Required actions following a workplace incident, including mandatory reporting procedures and any applicable post-incident drug and alcohol testing requirements in accordance with contractor's policy.

4 Incident & Environmental Reporting

- Health and safety incident reporting (injury, illness, vehicle accident, near miss, equipment damage)
- Environmental incident reporting (wildlife, habitat disturbance, spills, fires, protected species)
- Cultural and paleontological discovery procedures
- Regulatory notification requirements (if applicable)



5 Hazard Awareness & Site-Specific Risks

- Known site hazards (identify hazards specific to the project such as extreme weather, wildfire exposure, electrical, high voltage, rotating equipment, confined space, overhead, lifting, etc.)
- Workers Environmental Awareness Training (supplemental training slides prepared by Qualified Professionals and provided by Terra-Gen Environmental Compliance team)

6 Work Authorizations & Environmental Clearances

- Explicit Statement: Orientation does not authorize high-risk work. Possible Additional training and permits are required.
- Work tasks requiring specific authorization and/or permit issuance (Safe Work Permit, LOTO Permits, Confined Space Permits, Hot Work Permits, Excavation Authorizations, etc.)
- Biological / cultural / paleontological clearance requirements


7 Hazardous Materials & Environmental Compliance

- Handling & storage of hazardous materials (identify location of waste accumulation areas)
- Hazardous waste management requirements
- Explicit Statement: *Contractors and third parties are not authorized to sign hazardous waste shipping documentation on behalf of Terra-Gen when Terra-Gen is identified as the waste generator.*
- Spill prevention and response procedures (site-specific SPCC Plan)
- Stormwater controls (site-specific SWPPP compliance)
- Other site-specific plans requiring review to ensure site compliance

8 Training & Qualification Requirements

- Verification of qualified/competent/authorized persons
- Required certifications (e.g., LOTO, electrical, fall protection, MEWP, earthmoving, HazWOPER, if applicable)
- Task-specific training requirements
- Site Supervisor/Manager responsibilities for ensuring worker qualification prior to work start

9 Any other site-specific issues or items Terra-Gen deems appropriate for the Contractor's scope of work at the facility.

| | | | | |
|---|-----------------------|--|-----------------------|--|
|  Environmental Health & Safety | Document Title | Contractor Environmental Health & Safety Policy | Version Number | 2 |
| | Document Number | CORP-HS-109 | Document Owner | Director of Health, Safety, & Environmental Compliance |

Attachment 3: Contractor EH&S Orientation Acknowledgement Form



Contractor EH&S Orientation Acknowledgement

This form (paper or electronic) is required for contractor orientations at sites in the care and custody of Terra-Gen. This form may also be used by the Contractors performing orientations for the sites in their care and custody. Contractors may use their own form if it meets or exceeds the requirements in this form.

Instructions: After completing the site-specific Contractor EH&S Orientation, each participant must complete an acknowledgement. Attendance for the entire training session is required for eligibility to work on the project site.

For orientations conducted for sites under Terra-Gen's care and custody, the Terra-Gen employee assigned field management lead responsibilities in accordance with *CORP-HS-109 Contractor EH&S Policy* is responsible for collecting all completed acknowledgement forms. A digital acknowledgment in lieu of a signed acknowledgement form is acceptable, provided it includes the trainee, contractor company, and Terra-Gen site details reference below in Section 1. The field management lead shall ensure that electronic copies of all completed acknowledgement forms and/or digital acknowledgments are submitted to ehsadmin@terra-gen.com.

Upon request by Terra-Gen, Contractors with care of custody of sites shall provide Terra-Gen with evidence of all on-site workers who have completed their contractor orientation. Contractors must provide this evidence by emailing completed acknowledgment forms to ehsadmin@terra-gen.com.

Section 1: Contractor and Orientation Information

| | |
|---|--|
| Attendee Name | |
| Contractor Name the attendee works for | |
| Attendee email address | |
| Date of Orientation | |
| Project Site | |
| Instructor #1 Name and Title, Company | |
| Instructor #2 Name, Title, Company | |

Acknowledgement Statement: I have participated in the Contractor EH&S Orientation. I have been informed of, and understand, the work rules, safety requirements, environmental requirements and emergency response procedures required to be complied with at the facility. I have had a chance to ask questions and understand that if I have any future questions, I shall contact my employer.

| | |
|---------------------|--|
| Attendee Signature | |
| Date (of signature) | |