Compass Greenfield Development

Emergency Management Plan

Compass Greenfield Development

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If there is a fire or imminent threat to public safety immediately notify municipal emergency services.

Call 9-1-1

If remote from the scene of the emergency report the incident via the identified non-emergency municipal number.

Refer to Appendix E

Document Control

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Compass Greenfield Development

Mission

To support power consumers, project developers, First Nations, financiers and policy makers to enable the development of renewable and clean energy by providing objective and nuanced advice on risks and rewards associated with these investments.

Vision

We are the leading provider of renewable and clean energy development support services across North America.

Values

Customer focus - We take the time to understand your needs and develop a customized approach that is focused on producing results that meet them.

Quality - Details matter to us. We are focused on constantly improving our approach to ensure our work products are of the highest quality.

Integrity - We approach every engagement knowing that our reputation is embedded as part of our work products. Therefore we ensure that every assignment we take on is completed using a strong basis for assumptions, leveraging our experience and market leadership.

1 Navigation and Summary

This manual consists of 14 Sections, 6 Appendices, which include appropriate contact numbers and Compass Management emergency procedures.

1.1 Summary

The Compass Greenfield Development (Compass) Emergency Management Plan and supplemental Site-Specific Emergency Response Plans are designed to address emergency planning best practices, recommendations, and the requirements of the acts, regulations and standards pertaining to the operation of energy generation, storage and distribution infrastructure in the Province of Ontario and managed by Compass.

The Compass Emergency Management Plan has been developed to meet the following applicable legal program requirements:

- Fire Protection and Prevention Act
    - Ontario Regulation 213/07: Fire Code
- Ontario Electrical Safety Code
- Ontario Occupation Health and Safety Act

1.1.1 Agencies Having Jurisdiction

The Emergency Management Plan has also been developed to reflect the authority of municipal and Ontario provincial agencies and their jurisdiction that may be exercised in the response to an emergency.

Municipal Agencies

- Municipal Fire Service
- Local / Regional Police Services
- Local / Regional Emergency Medical Services
- Regional Health Units / Services

Provincial Ministries / Agencies

- Ontario Ministry of Environment, Conservation and Parks
- Saskatchewan Ministry of Environment
- Ontario Electrical Safety Authority
- Ontario Ministry of Labour, Immigration, Training and Skills Development
- Saskatchewan Ministry of Labour Relations & Workplace Safety / Workers Compensation Board
- Emergency Management Ontario
- Saskatchewan Public Safety Agency

1.2 Operator Information

Compass Greenfield Development was born out of Compass Renewable Energy Consulting Inc. a regulatory, strategic and technical advisory firm working across the North American renewable and clean energy markets since 2011.

Compass Greenfield Development leverages our consulting DNA, implementing a proven process, to identify and advance greenfield development opportunities for solar and battery energy storage. We have a long-term strategic perspective coupled with on the ground experience in doing the doing that results in projects getting to commercial operation. All of our stakeholders benefit including landowners, municipalities, Indigenous partners, investors and the public at large.

At our core CGD believes in the importance of facilitating the transition to a clean energy future and takes pride in being at the front lines of working with government, landowners, Indigenous Partners and community organizations in making it a reality.

1.3 Plan Administration

This document meets the requirements of Compass's document control procedure. All printed copies of the EMP shall be numbered and deemed to be controlled. The Director of Construction and Operations shall maintain a master list of all controlled copy holders and proof of receipt by controlled document holder. Any revisions to the plan will be documented on the Revision Log in this Section. The document will reside in Compass's electronic document control system.

2 Introduction

2.1 Plan Scope

This plan governs the execution of emergency management activities to all emergencies and incidents occurring on or within Compass buildings or operations in Ontario. Where required Site-Specific Emergency Response Plans have been developed to define site-specific fire safety, suppression, and emergency response strategies.

2.1.1 Emergency Definition

Compass defines an emergency as any event which poses the following:

- An immediate and serious threat to the health or safety of its employees, contractors or to the public;
- Threatens the integrity of a Compass managed operation;
- Threatens to disrupt Compass's continuity of business services; and/or
- Has the potential to impact the community or environment.

The following events shall be considered an emergency:

- Fire or explosion;
- Death or critical injury;
- Evacuation of one or more tenant suites or units;
- An unplanned disruption of a critical service, e.g. water, electricity, etc.;
- A natural event e.g., flood, severe storm, etc. having a potentially adverse impact on a Compass operation or facility;
- Any third-party action or incident that may or has threatened the safety of a Compass employee or contractor or has the potential to disrupt the continuity of Compass's business services.

2.2 Plan Coverage

The Compass Emergency Management Plan will be used to guide emergency management operations in the Province of Ontario.

3 Compass Operations & Facilities

Compass maintains and manages Thirteen (13) energy infrastructure operations in ten (10) municipalities in the Provinces of Ontario and Saskatchewan.

3.1 Types of Operations Managed

3.1.1 Battery Energy Storage Systems

Battery Energy Storage Systems, or BESS, are rechargeable batteries that can store energy from different sources and discharge it when needed. BESS consist of one or more batteries and can be used to balance the electric grid, provide backup power and improve grid stability.

3.1.1 Solar Photovoltaic Generation Systems

Solar Photovoltaic (PV) Generation Systems are installations that use PV panels to convert sunlight into electricity. These systems consist of multiple PV panels, inverters, and associated equipment to capture solar energy and transform it into usable electrical power.

3.2 Compass Infrastructure

3.2.1 Battery Energy Storage Systems

Almonte Battery Energy Storage System

Located at 6299 County Road 29 in the Municipality of Mississippi Mills, ON, Compass operates a 4.999 MW / 19.996 MWh Battery Energy Storage System that is interconnected with Hydro-One Networks Inc.

Walker Battery Energy Storage System

Located at 3940 North Service Road East in the City of Windsor, ON, Compass operates three (3) 4.999 MW / 19.996 MWh Battery Energy Storage System that are interconnected with Enwin Utilities Ltd.

Almonte Battery Energy Storage System 2

Located at 6299 County Road 29 in the Municipality of Mississippi Mills, ON, Compass operates a 9.999 MW / 39.996 MWh Battery Energy Storage System that is interconnected with Hydro-One Networks Inc.

3.2.2 Solar Photovoltaic Generation Systems

BPSL Solar Photovoltaic Generation System

Located off Regional Road 559 in the Township of Carling, ON. Compass operates a 0.6 MW Photovoltaic Generation System that is interconnected with Hydro-One Networks Inc.

BTBA Solar Photovoltaic Generation System

Located off Township Road 9 in the Township of Blanford-Blenheim, ON, North of the Hamlet of Wolverton. Compass operates a 0.6 MW Photovoltaic Generation System that is interconnected with Hydro-One Networks Inc.

PWPJ Solar Photovoltaic Generation System

Located off Concession Road 8 East in the Municipality of Arran–Elderslie, ON, West of the Village of Tara. Compass operates a 0.6 MW Photovoltaic Generation System that is interconnected with Hydro-One Networks Inc.

SD75 Solar Photovoltaic Generation System

Located off Ontario Highway 124 in the Municipality of McDougall, ON. Compass operates a 0.6 MW Photovoltaic Generation System that is interconnected with Hydro-One Networks Inc.

Cossette Solar Photovoltaic Generation System

Located off Highway 18 in the Rural municipality of Estevan, SK, East of the City of Estevan. Compass operates a 1.407 MW Photovoltaic Generation System that is interconnected with SaskPower.

Weyburn I & II Solar Photovoltaic Generation System

Located off Highway 39 in the Rural municipality of Weyburn, SK, South-East of the City of Weyburn. Compass operates a 2.814 MW Photovoltaic Generation System that is interconnected with SaskPower.

NM Solar Photovoltaic Generation System

Located off Municipal Road 705 in the Rural municipality of Lomond, SK, South of the City of Weyburn. Compass operates a 1.407 MW Photovoltaic Generation System that is interconnected with SaskPower.

3.3 Compass Management Offices

3.3.1 Compass Greenfield Development Head Office

The Compass Head Office is located in Suite 506 at 192 Spadina Avenue, Toronto, ON. This facility consists of general offices and monitoring via SCADA of its operations.

3.3.2 Workbench Energy Network Operations Centre

The Workbench Energy Network Operations Center (NOC) is located at 14a Hazelton Ave, Suite 301, Toronto Ontario. Workbench is contracted by Compass to monitor asset status including battery facility heath, correcting issue resolution, and alarm dispatch.

4 Hazard / Threat Identification & Risk Assessment

4.1 Hazards and Threat to Facility Operations

Hazards and threats to Compass operations have been identified and assessed based on the following criteria and been deemed to be credible to the operation of the facility:

- An off-normal condition may occur within a system and be related to its operations.
- An off-normal condition is reasonably foreseeable (i.e. the circumstances leading to the condition can be anticipated to occur.), and,
- An off-normal condition has the potential to cause an adverse effect.

Identified hazards and threats have been identified as follows:

- Equipment failure resulting in thermal runaway of one or more battery cells/modules (BESS Operations)
- Failure of mitigation control
- Mechanical Damage / Vehicle collision
- Natural disaster / severe weather
- Security event

4.2 Hazard and Threat Risk Assessment

4.2.1 Battery Energy Storage Systems

Tesla system literature indicates that during thermal runaway testing no hydrogen fluoride was detected in off gases or combustion products. That said; in many cases, industry literature describes the release of hydrogen fluoride as being commonly released in concentrations between 20-200 mg/Wh.[1]

Within Site-Specific Emergency Response Plans Compass has included an evaluation of the toxic endpoints (Emergency Response Planning Guidelines / ERPG) of hydrogen fluoride gas as a consequence of a worst-case scenario. To appropriately assess the threat, scenarios are evaluated under averaged summer and winter conditions where applicable.

[1] Larsson, F.; Lithium-ion Battery Safety – Assessment by Abuse Testing, Fluoride gas Emissions and Fire Propagation, **2017, pg. 56**. ISBN: 978-91-7597-612-9

4.3 Consequence Assessment

In the event of an off-normal condition within a Compass operated system or some other external factor resulting in the damage of equipment, initiating a thermal runway condition, fire or other release the following potential consequences have been identified.

Electrolyte Vapour (Thermal Runaway)

- Human health & safety consequences e.g., Inhalation, skin / eye contact damage.
- Environmental consequences
- Facility infrastructure / operational impacts due thermal impacts
- Disruption of business services

Battery Module Coolant

- Human health & safety consequences.
- Environmental consequences

Battery Module Refrigerant

- Human health & safety consequences.
- Environmental consequences

4.4 Product Safety Data Sheets

Product Safety Data Sheet (SDS) for products utilized at Compass Battery Energy Storage Systems are available via CANUTEC or in the Site-Specific Emergency Response Plan that is available on-site

In the event of a response emergency personnel and response contractors upon arrival at site will be briefed via the incident safety plan on all specific hazards for the equipment or product involved. In the event of an emergency.

5 Prevention / Mitigation

5.1 Administrative Controls

5.1.1 Safety Training

Records of employee training are managed by the Compass Joint Health & Safety Committee.

5.1.2 Contractor and Visitor Safety Management

All Contractors and Visitors coming onto the Compass property must coordinate with the appropriate Compass representative where they can be accounted for in the event of an emergency. Visitors and Contractors are given a safety awareness briefing which outlines the types of emergencies possible at the site, an overview of the hazards associated with the equipment at the site, the on-site and off-site muster locations, and site-specific safe work practices at the subject site.

The following documents shall be adhered to while on-site:

- Contractor/Sub-contractor Handbook
- Visitor Safety and Security Rules for Compass Operations
- Issued Safe Work Permits

5.1.3 Emergency Shutdown Procedures

Compass has in place site-specific emergency shut-down procedures in each Site-Specific Emergency Response Plan which also contains a site plan with site access/egress routes and muster points.

5.1.4 Standard Operating Procedures

Compass maintains standard operating procedures which outline specific work instructions for each facet of operation, including personal protective equipment requirements, communication protocols, inspection and maintenance programs and emergency procedures in the event of an off-normal condition or other failure.

Standard Operating Procedures are available to personnel and are located within Compass.

5.1.5 Site-Specific Emergency Response Plans

Site-Specific Emergency Response Plans provide a detailed understanding of the subject site and its operations. Plans detail the roles and responsibilities of Compass personnel, municipal emergency first responders and contracted resources. They include notification and communication procedures in the event of an emergency and define the anticipated incident management structure. Plans include information regarding the substances on-site, potential consequences associated with emergency scenarios and the tactics that should be employed to mitigate an incident should it occur.

5.2 Engineering Controls

5.2.1 Facility Preventative Maintenance & Integrity

A Compass Preventative Maintenance and Inspection program is implemented and designed to maintain equipment according to the manufacturer recommendations. This program is pivotal in keeping equipment in good condition, minimizing the risk of a disruption of service and potential for equipment failure and possible offsite consequences.

5.2.2 Battery Management System

Where a Battery Energy Storage System is operated by Compass a battery management system (BMS) that tracks the performance, voltage, current, and state of charge of the cells will be utilized.

The BMS is a layered system, where each battery module has its own BMS and has a bus controller supervising the output of all the battery modules. The Battery Management System is engineered to react to fault conditions in an autonomous manner, with safeguards built into the firmware. Fault conditions include, but are not limited to, over-temperature, loss of communication, over-voltage, and isolation.

Depending on the severity of the fault condition, the BMS can automatically isolate the affected battery module temporarily or it can permanently disconnect the module potentially preventing thermal runaway from occurring or prohibit the propagation of thermal runaway to adjacent cells/module.

5.2.3 Site Control and Monitoring

Where Tesla products have been utilized Compass Battery Energy Storage Systems are supported by a Tesla Local Operations Center (LOC), which is designed to support Tesla energy storage products. Tesla systems have 24/7 remote monitoring, diagnostics, and troubleshooting capabilities. Off-normal conditions that may require corrective action can be completed through remote means or via a dispatched field service visit.

Workbench Energy has been contracted by Compass to operate and monitor all BESS assets via a distributed Supervisory Control and Data Acquisition (SCADA) system architecture Voltages, temperatures, and alarms are monitored 24/7, and technical or emergency response to anomalies can be dispatched.

The Tesla Local Operations Center; via a hotline, provide technical support to customers and emergency first responders should an emergency occur.

5.2.4 Thermal Management System

Tesla systems have a Thermal Management System which provide a suitable operating temperature for the unit.

The Thermal Management System contains a closed-loop liquid cooling system that circulates a 50/50 mixture of ethylene glycol and water throughout the battery modules and power electronics to maintain an optimum battery operating temperature. The system works autonomously and does not require user feedback or controls to turn the system on when needed or to adjust temperature settings. The thermal cabinet; located with in the unit, includes pumps that circulate the liquid

coolant through the unit, an in-line heater that can warm the coolant and a compressor that maintains thermal control for the cabinet.

5.2.5 Electrical Fault Protection

Tesla systems have several passive and active safety control mechanisms installed within the battery module circuit and distribution circuit that would be available to interrupt a fault current. At a high level, these electrical fault protection features include:

- Battery module overcurrent protection: A DC single-use fusible links mounted directly on the battery modules that can interrupt the flow of an overcurrent in the battery module during an off-normal electrical event.
- Inverter DC protection: The inverter modules, which are installed at each of the battery modules, are equipped with a high-speed pyrotechnic fuse that can isolate the battery module passively or actively during an off-normal event.
- Inverter AC protection: Each inverter module is equipped with its own AC contactor and AC fuses should an off-normal electrical event occur at the inverter module on the AC side of the circuit.
- Ground fault protection: A detection system which measures insulation resistance prior to operation and looks for excessive leakage current during operation.

5.2.6 Explosion Control Systems

Tesla battery energy storage systems include an explosion control system to mitigate the risk of an uncontrolled deflagration. The system includes pressure-sensitive vents (overpressure vents) and sparkers installed throughout the battery module. The sparkers are designed to ignite flammable gases very early in a thermal runaway event before they accumulate within the enclosure and become an explosion hazard. They are installed at a variety of locations and heights throughout the battery module bays to ensure the flammable gases released during thermal runaway quickly meet an ignition source.

The overpressure vents are installed in the roof of the sealed battery enclosure. When activated, the overpressure vents open up into the enclosed thermal roof, ensuring that the release of the overpressure vents does not create a projectile hazard. The overpressure vents themselves are passive and are not actuated or controlled by another device. They are designed to release during an overpressure event, such as the rapid ignition of flammable gases by a sparker. Once opened, the overpressure vents permit gases, products of combustion, and flames to safely exhaust through the roof during a thermal event.

5.2.7 Surface Water and Effluent Management

Where applicable Compass holds Ontario Ministry of Environment, Conservation and Parks Environmental Compliance Approval (ECA) for sewage works.

Site design features are implemented to prevent contaminated surface water and/or effluents from inadvertently discharging to receiving waters or to municipal sewer system.

Refer to Site-Specific Emergency Response Plans ECA requirements.

5.3 Security Management

5.3.1 Gates and Fence

All Compass sites maintain a perimeter secured with 2.4 m high / 3-strand barbed wire fencing and control gates. In cases additional layers of security are provided where fence protrusions occur or other potential threats exist. Physical barriers are routinely inspected by third-party security.

5.3.2 Surveillance System

Compass sites are monitored remotely. BESS infrastructure intrusion when detected will trigger a notification and security service assessment. A perimeter detection system and Pan/Tilt/Zoon camera provide real-time video feed and notifications of intrusion via the SCADA system. See ***Figure 5-1*** for a schematic of perimeter detection system at the Almonte BESS.

5.4 Fire Suppression

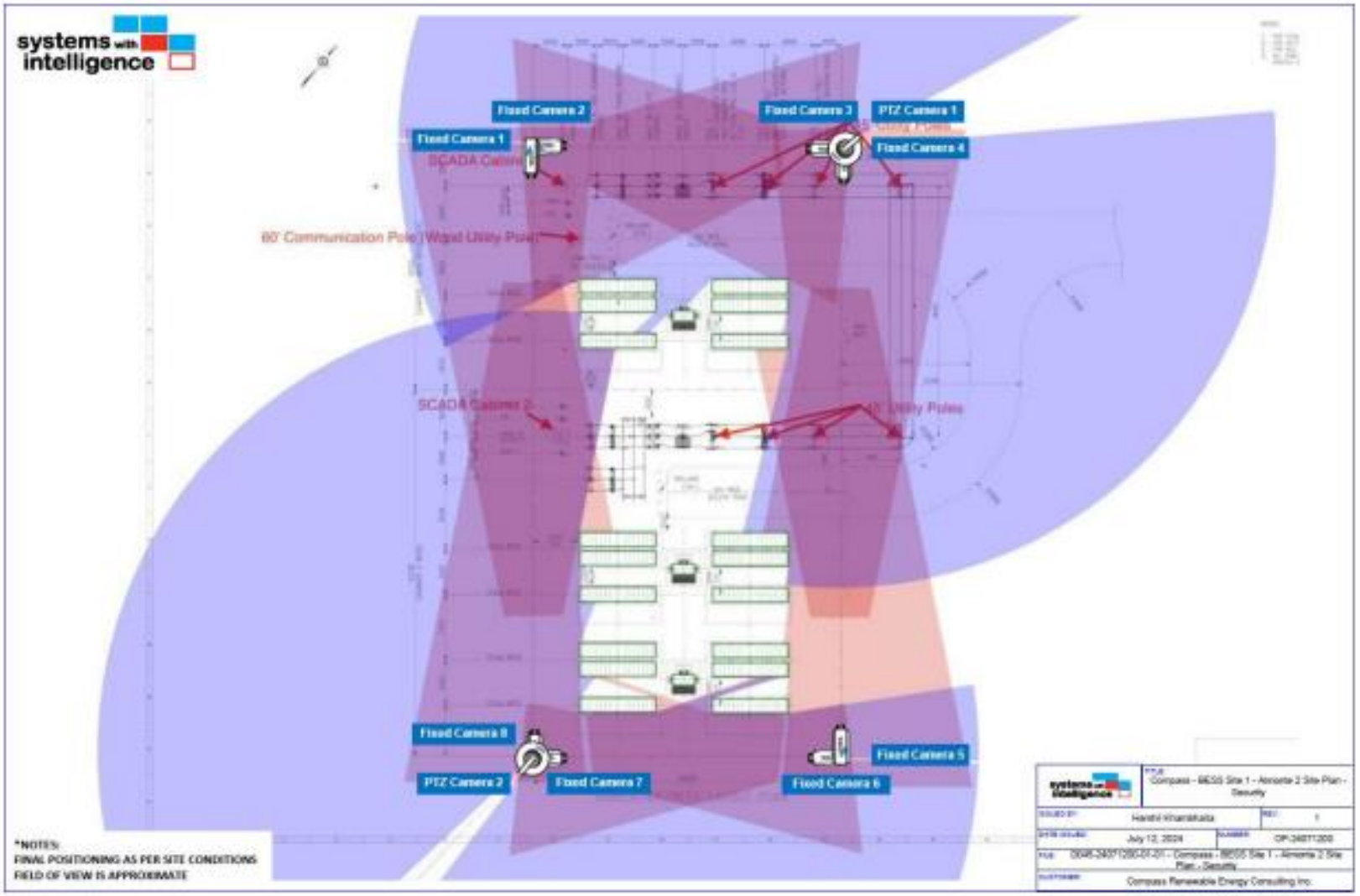
Compass coordinates with the appropriate municipal fire service and where appropriate shares information regarding the on-site systems, hazardous material and appropriate suppression tactics.

5.4.1 Battery Energy Storage Systems – Fire Suppression

In the event of a fire the following shall be recommended;

- Allow the affected unit to consume itself as it is designed to do. Applying water to the burning unit will have minimal effect and will only slow its eventual combustion.
- At the discretion of first responders, apply water (fog pattern) to the exposures.
- Monitor the effected unit and allow the unit to cool down.

Figure 5-1 Perimeter Detection System - Almonte BESS.



6 Compass Emergency Response Management

6.1 Compass Incident Management System

Compass has adopted the Incident Management System (IMS) and the principles of Unified Command. In the event of an incident where Compass has been identified as a responsible party Compass shall establish a unified command structure with responding authorities and appropriate stakeholders. Further, Compass shall encourage the establishment of a Unified Command approach where Compass is engaged as a third party. This will ensure that the interests of Compass are appropriately expressed and that the response priorities and strategies are effectively aligned with Compass's commitment to social responsibility.

In most cases emergencies Compass will respond and be considered short-term responses that are relatively small in scope and/or duration and require few external resources. These incidents will be generally managed by Compass's Site Operator and documented using only the Incident Command Briefing (***ICS 201 Incident Brief Form***). In the event of a more significant incident which might entail greater engagement of Compass management and external resources Compass will follow the IMS model for incident response planning.

The ICS 201 will form the foundation of the briefing when a command transition is to occur and a Compass Emergency Management team is to establish an expanded command structure.

6.2 Response by Objective

In response to any emergency Compass shall respond in accordance with its operational policies ensuring that all response efforts abide by Compass's core emergency management objectives.

- Life Safety Protection
- Stabilization of the Emergency
- Minimization of the consequences

6.3 Incident Command System – Unified Command

6.3.1 Single Command

Single Command (with a single Compass Incident Commander) will be applied on smaller incidents, where few, if any regulators or outside agencies attend the incident or play any significant role. A Single Command model is usually followed when:

- Only Compass is involved

Compass will utilize the Single Command approach when they are overseeing an incident in its entirety. Additionally, a larger scale incident will commonly transition from Unified to Single Command when an incident completes the Emergency Phase and transitions into a recovery project.

6.3.2 Unified Command

Unified Command is a principle within the Incident Management System that provides for representatives of key stakeholders to be involved with the overall incident management and in the development of response management objectives. It enables decisions to be made jointly by two or more organizations (e.g., Compass and other agencies) that have legal responsibilities regarding an

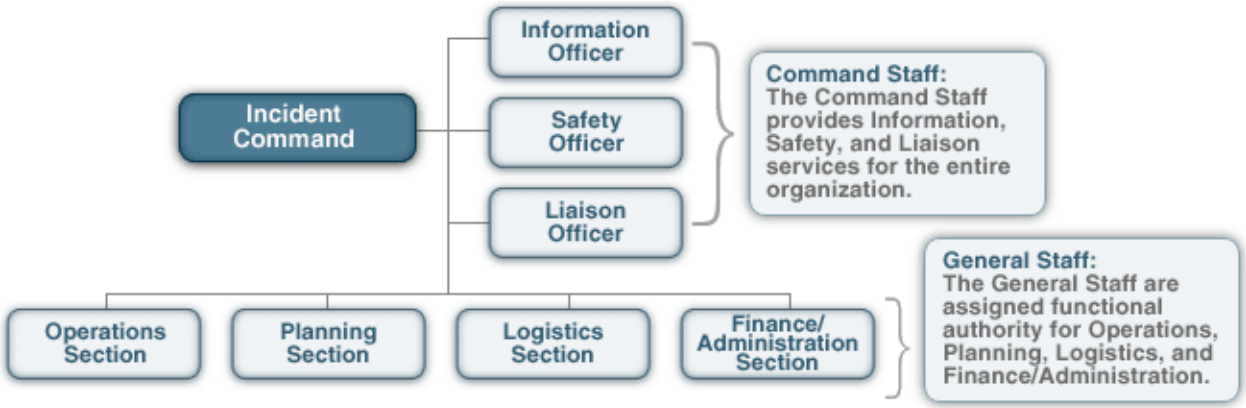
incident. Incident Command does not automatically become *unified* because of the involvement of more than one jurisdiction. Rather, Unified Command is required when incident management requires decision-making to come from more than one jurisdiction. Once joint decisions have been made, one member is identified to speak for the Unified Command Team. Compass will work closely with all agencies to ensure a safe and effective response.

The Unified Command may have representatives from the following:

- Municipal and/or regional emergency services (Fire, police, etc.);
- Regional and/or provincial authorities having jurisdiction e.g., Regional public health unit, Electrical Safety Authority, etc.

Refer to **Figure 6-1** Incident Command Structure as an example of a typical incident management structure.

Figure 6-1 Incident Command Organizational Structure



6.3.3 Interoperability

One of the most important terms to remember during an emergency is interoperability; the ability of responders from different organizations and jurisdictions to interact and work well together. In the case of Compass the primary mechanism to ensure interoperability will be through the utilization of the Incident Management System which ensures standardized terms, structures and procedures are used by all responders to allow people from different organizations and jurisdictions to understand each other's jobs and requirements and to cooperate and work well together.

6.4 Response Planning

Short-term responses that are small in scope and/or duration and require few resources will often be managed using only the Incident Command Briefing (***ICS 201 Incident Brief Form***). Larger more complex responses will initially utilize the ICS 201 and use an Incident Briefing to support the transfer of command in cases commencing a proactive planning cycle.

6.4.1 Incident Briefing

During the transfer of command process, an Incident Briefing provides the incoming Incident Commander with basic information regarding the incident situation and the resources allotted to the incident. The Incident Briefing Form (ICS 201) is the Incident Action Plan for the initial response and remains in force and continues to develop until the short-term response ends or the Incident Management Team has established an Incident Action Plan for the forthcoming operation period.

The Incident Briefing process may also be used for briefing individuals newly assigned to Command and General Staff while the response remains in the initial response phase or as noted is short-term in nature.

The Incident Briefing should address the following topics of the response:

- Situation (Compass asset and geographic context, exposures, safety concerns);
- Objectives and priorities;
- Strategies and tactics (implemented and planned);
- Current organizational structure including agency and third-party representatives;
- Resource assignments;
- Resources enroute / ordered; and,
- Facilities established or planned.

6.5 Incident Action Planning Process

Once the management of an incident requires a more robust approach to the development of a plan and subsequent strategies and tactics Compass's Incident Management Team will utilize the Simplified Planning Cycle.

The Simplified Planning Cycle defines various steps in the process, executed in sequence, helps ensure a comprehensive Incident Action Plan (IAP) is developed. These steps support the accomplishment of objectives within a specified time. The development of IAPs is a cyclical process, and personnel repeat the planning steps every operational period. The Operational Period Planning Cycle is a graphic depiction of this cycle. Personnel develop the IAP using the information gathered during the Do and Check elements of the planning cycle. The Adjust and Planning elements support the development or revision of the next Incident Action Plan.

Compass will utilize the Simplified Planning Cycle to coordinate operational planning.

Figure 6-2 Incident Management Simplified Planning Cycle

6.6 Incident Management System Roles and Responsibilities

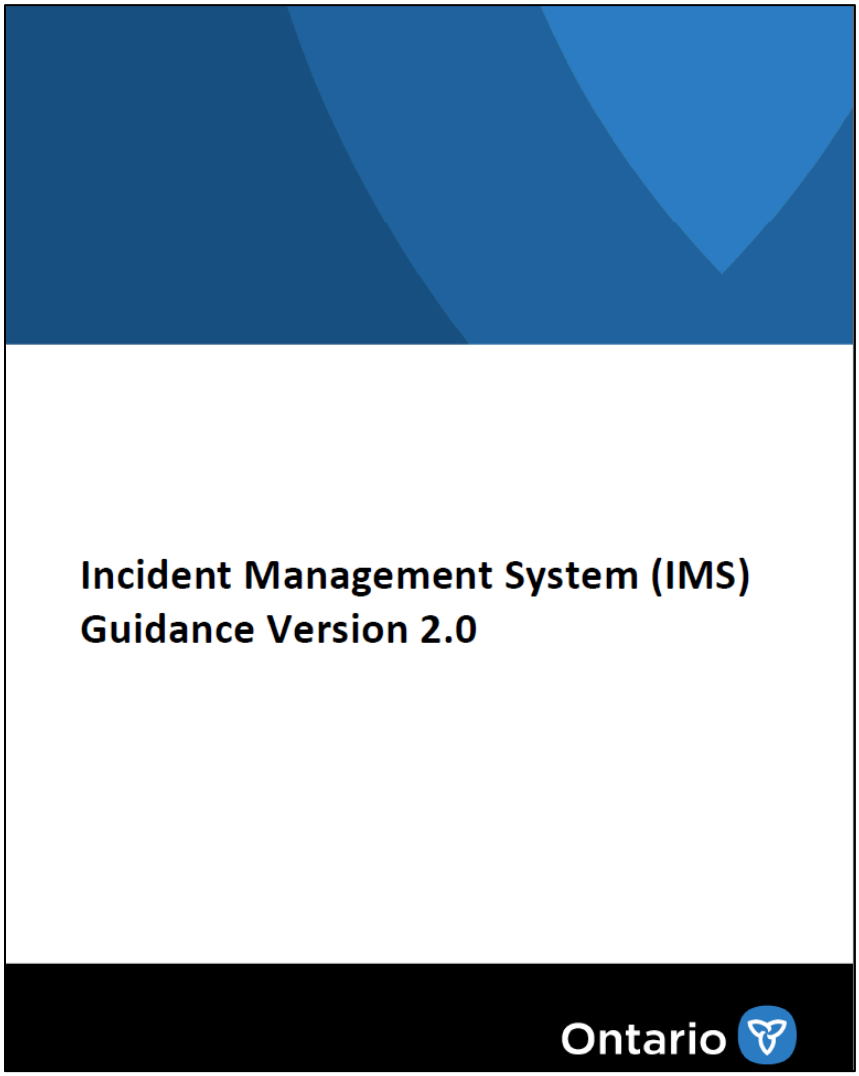
Incident Management System Position responsibilities can be referenced in the **Ontario Incident Management System Guidance** document (*Section 6: Site Coordination: Sections and Roles*).

Additionally, the handbook provides all necessary guidance on the transition from initial incident management through the planning cycle to implementation of an Incident Action Plan.

The Ontario Incident Management System Guidance 2.0 is available digitally via the following address.

https://www.ontario.ca/document/incident-management-system-ims-guidance-version-2

Figure 6-3 Ontario Incident Management System Guidance V2.0



7 Compass Emergency Management Resources

7.1 Incident Management Team - Regional Resources

7.1.1 Facility Operators

Each Compass managed BESS operation is represented by a Facility Operator (Workbench Energy). Their general responsibilities consist of coordinating and supervising site and system maintenance.

During an incident or an emergency the Facility Operator will receive an alarm via the systems SCADA. The Facility Operator will initiate notifications to Compass; some automatic, via email/text and liaise with municipal emergency services should they be required. The Facility Operator will act as the initial Compass Incident Commander.

7.1.2 Operations Manager

Compass Operations Managers are located in the Head Office(s) and are responsible for supporting the Facility Operator.

As noted, in the event of an incident or emergency the Facility Operator will notify, and initially liaise with municipal emergency services. Should an incident require a protracted response, result, or have the potential to result in significant consequences the Operations Manager may resume command of the incident and mobilize the required physical and human resources.

Identified Compass staff are to be trained up to IMS 100.

7.1.3 Subject Matter Experts

In the event an incident impacts a Batter Energy Storage System Compass shall request support from the Tesla Energy Technical Support and /or the Local Operations Center.

7.2 Crisis Management Team

The Compass Crisis Management Team (CMT) is composed of Compass leadership. The primary purpose of the CMT is to provide strategic direction for the response to a significant incident. The chief focus would be directed at managing external impacts on the corporation associated with any incident. Additionally, the CMT shall provide support to the Incident Management Team while it is directed towards responding to control the direct impacts of the incident.

External impacts that the Compass CMT should consider:

- Public Information;
- Insurance / Proof-of-Loss;
- Shareholder management;
- Municipal planning.

7.2.1 Emergency Operations Centre

The Emergency Operations Centre will be the base of operations for the Compass Crisis Management Team should they be stood up to support a Compass Emergency Management Team. The Emergency Operations Centre is different from the Incident Command Post as it will be located

at the Compass head office whereas the Incident Command Post will be located at or near the incident site.

One (1) location has been preidentified to support the Emergency Operations Centre.

- Compass Head Office. Suite 506, 192 Spadina Avenue, Toronto, ON

7.3 Compass Emergency Service and Response Contractors

Emergency response and service contractors are an integral part of any emergency response. Compass has a diverse group of infrastructure service contractors that have the resources and capabilities that can support the management of an effective response.

*Contact Information is located in **Appendix D**.*

Presently Compass have service agreements with four (4) contractors for the following services:

- Site Operation and Monitoring
- Site / Electrical Maintenance / Emergency Maintenance
- Equipment Subject Matter Expertise
- Landscaping

Presently Compass have service agreements with five (5) service providers for the following emergency response services:

- Incident Management Services
- Crisis Management Team Support Services
- Public Relations / Media Services
- Legal Services
- Claims Adjusting

7.4 Compass Emergency Management Consultants

Emergency management consultants can play an integral part in an emergency response. Compass emergency management consultants have emergency science resources and technical capacity that can support response management and provide areas of expertise and diverse capabilities to assist in an effective response.

7.4.1 Antler Group

Antler Group is an emergency response consultant that provides a myriad of emergency management and disaster mitigation services such as;

- Chemical Response / Incident management
- Crisis Management Team support
- Hazardous Material Technical Services

7.4.2 Shearwater Environmental Emergency Solutions Inc.

Shearwater Environmental Emergency Solutions Inc. is an environmental emergency management consultant that provides a myriad of emergency management services such as;

- Incident management - coaching and training
- Crisis Management Team support
- Regulatory interface / liaison
- Incident management – support

8 Emergency Response Training & Preparedness

8.1 Compass Emergency Management Training

Records of emergency management training are managed by Compass's Director of Construction and Operations. Additional training elements are defined in **Section 5.**

8.1.1 Incident Management

Compass incident management personnel are trained and maintain their knowledge of the Incident Command System on a biannual basis. Compass Incident Management Team personnel are required to complete incident management training; ICS 100 and 200 level training along with familiarization with the Compass Emergency Management Plan, supplemental Site-Specific Emergency Response Plans and it associated procedures.

8.2 Emergency Exercises

Compass has established an exercise approach to allow for the testing of emergency procedures, response strategies and operational period response plans. Compass exercises will test the interaction between its service providers, stakeholders, authorities having jurisdiction (Fire Dept., Ontario MECP, etc.) and local communities.

The following sections describe Compass's exercise approach.

Table 8-1 Proposed Exercise Type Schedule

Hazard	Year 1	Year 2	Year 3	Year 4	Year 5
Site Emergency	Table-top Exercise		Full-Scale Exercise (1 day)	Table-top Exercise	
Fire		Table-top Exercise			Table-top Exercise

8.3 Emergency Management Consultation & Engagement

Compass's consultation and outreach process continue to evolve to reflect changes in stakeholders and input from agencies having jurisdiction Currently, Compass conducts the following consultation and outreach efforts.

8.4.1 Annual Emergency Management Outreach

Compass strives to annually share information regarding Compass's emergency management program and site-specific response procedures with its municipal partners and stakeholders. Information gathered via feedback or input from stakeholders is reviewed and integrated where possible to ensure a more robust emergency management plan.

A Compass Outreach / Engagement often includes the following elements:

- Organizational overview and Incident Management approach
- Site orientation with core and volunteer municipal fire service.
- Review of on-site hazardous materials.

- Review of anticipated response strategies and tactics.

9 Incident Assessment and Response Activation

Compass's facility operator (Workbench Energy) monitors Compass sites 24/7. In the event of an actual or potential emergency automatic notification will be sent via SMS/email to the operations and management team

9.1 Incident Response Activation

Emergencies involving a Compass facility, infrastructure or operations can be detected and/or reported by infrastructure monitoring personnel, Compass personnel, members of the public, private property owners or municipal emergency services. An incident may involve any of the previously identified emergencies or threats:

- Fire or explosion;
- Death or critical injury or any serious threat to the health or safety of its employees, contractors or to the public;
- An unplanned disruption of a critical service, e.g. water, electricity, etc. that threatens to disrupt Compass's continuity of business services; and/or
- A natural event e.g., flood, severe storm, etc. having a potentially adverse impact on a Compass operation or facility;
- Any third-party action or incident that may or has threatened the safety of a Compass employee or contractor or has the potential to disrupt the continuity of Compass's business services; or ,
- Any event that has the potential to impact the community or environment.

9.2 Incident Response Process – Emergency Event

An emergency event occurs.

1. A Facility Operator is notified or made aware of an actual or potential building emergency via:
    - Infrastructure monitoring service i.e. Tesla Local Operations Control;
    - Contractor notification;
    - Municipal emergency services notification;
    - Observed conditions
    - Weather alert; or
    - Other.
2. Facility Operator directs onsite emergency shut-down (external emergency stop (E-Stop) button) or initiates remote emergency shut-down or isolation of the operation;
3. Facility Operator shall refer to the Site-Specific Emergency Response Plan for site-specific response strategies and tactics if applicable.
4. Facility Operator assumes role of Compass Incident Commander;
5. Compass Incident Commander notifies municipal emergency services via **9-1-1** if not already advised;

    Refer to **Appendix E** for municipal emergency service contact information.

6. Compass Incident Commander initiates notification to appropriate Compass Operations Manager;
7. Compass Incident Commander conducts or delegates regulatory notifications, e.g. Ontario Ministry of the Environment, Conservation and Parks, Ontario Ministry of Labour, etc.;

   Refer to **Appendix C** for regulatory agency contact information.
8. Compass Incident Commander liaises with attending municipal emergency services Incident Commander, i.e. Platoon Fire Chief;
9. An Incident Command Post is identified as required;
10. Compass Incident Commander initiates incident management documentation:
    - ICS 201 Incident Brief Form;
    - ICS 205A Communications List;
    - ICS 208 Safety Message / Plan; and,
    - ICS 214 Activity Log;
11. Depending on actual or potential consequences Compass Incident Command role is transferred to appropriate Compass personnel;
12. In event of municipal emergency services directed evacuation a Compass representative (*Liaison Officer*) shall liaise with the municipal social services provider and coordinate and/or support required social services;
13. Compass Incident Commander activates additional emergency service providers;
14. A Compass Incident Management Team is established at an appropriate location;
15. Additional Compass personnel are notified and seconded to positions of the Incident Management Team.
16. Compass Incident Commander shall notify Compass Leadership as required.
    - Managing Director
    - Director of Consulting & Operations
    - Manager of Engineering Services
17. The Compass Incident Management structure will remain operational until all emergency objectives have been met or outstanding operations can be managed under pre-established project management regimes.

9.3 Initial Response Roles & Responsibilities

9.3.1 Facility Operator

Responsibilities

- Maintain liaison with municipal emergency services;
- Maintain liaison with infrastructure monitoring partner, i.e. Tesla;

- Activate the required emergency support services:
- Instigate internal notifications and document all emergency operations on the ICS 201 Incident Brief Form

9.3.2 Operations Manager

Responsibilities

- Assume Incident Command, establish and incident management structure and second staff to the Incident Management Team and assign appropriate incident management positions.
- Conduct or ensure the completion of notifications to municipal emergency services and regulators as per the Compass EMP.
- Review, revise and communicate Incident Management objectives.
- Activate emergency response resources (contractors, consultants, etc.) as required.
- Establish and maintain a Personal Activity Log.
- Maintain an ICS 201 Incident Brief and continue to document implemented incident management and recovery tactics as they are implemented.
- Maintain liaison with attending municipal emergency services, e.g. Fire Service, Police, EMS, municipal public works, etc.

10 Incident Response

10.1 Initial Incident Response Objectives

At the onset of an emergency Compass Incident Command shall immediately take emergency response measures reflecting Compass's core emergency management objectives.

Life Safety

Immediately initiate emergency medical services to support those injured.

Protect Compass staff, contractors, and the public.

Protect the safety of all incident responders and those affected by the incident

Stabilize the Emergency

Implement initial control measures to mitigate the emergency.

Minimize the impacts

Protect property and the environment

Prevent and/or reduce economic and social losses.

Ensure the continuity of Compass critical services

10.2 Initial Response Strategies

Incident specific objectives should guide Compass in the development of response strategies; however, the Site-Specific Emergency Response Plan offer guidance regarding immediate response strategies and procedures. The following sections outline primary response strategies that should be considered during all responses:

- Safety and Scene Control
- Incident Mitigation
- Incident Response Safety Zones
- Response Safety Management

10.3 Safety and Scene Control

The protection of Life, Environment and Property are the prime Objectives of the Plan.

Safety and scene control will be established by the Compass Incident Commander or delegate if not yet established by municipal emergency services. Scene control will ensure that access is restricted to the public and access for responders is through a controlled access corridor set up during site staging.

Additional warnings / controls shall be considered in the form of roadblocks and warning signs to communicate the hazard.

Occupational safety is of paramount importance in the conduct of company business. Every effort will be made to provide a safe work environment, identify, and control health and safety hazards, and promote the health and safety of all company employees and contractor personnel.

10.4 Incident Response Safety Zones

In the event of an incident that poses a potential life safety risk e.g. natural gas release, diesel/gasoline spill, fire, etc. the Compass Incident Commander should attempt to establish a safety checkpoint, identify the Warm Zone perimeter (approx. 100 M upwind from the incident) and additional safety zones as required. **Figure 10-1** illustrates approximate safety zones.

10.4.1 Hot Zone -Emergency Responder Isolation Zone (25 M)

This zone may expand or contract based on the hazards present but often will consist of atmospheric hazards requiring respiratory protection, flammable atmospheres and may be contaminated.

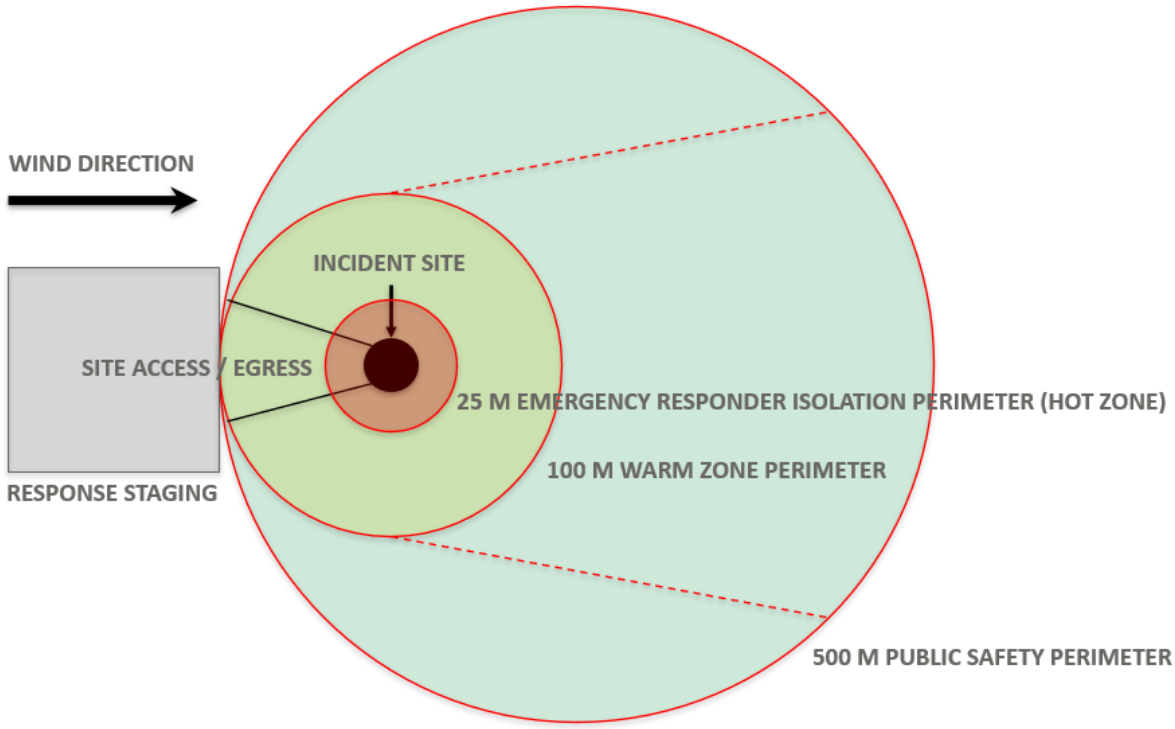
10.4.2 Warm Zone (100 M)

This zone provides a buffer between the hot and cold zone. An access and egress route up-wind of the incident site will limit the over all impact to the site and provide a safe route to a staging area or a location to conduct decontamination of personnel and equipment.

10.4.3 Cold Zone - Public Safety Perimeter (500 M)

This zone establishes a protective safety zone ensuring the protection of the public from any hazards associated with the incident and a safe zone where staging and command of an incident can occur.

Figure 10-1 Incident Response Safety Zones



10.5 Incident Mitigation

Initial incident mitigation will reduce or eliminate the threat to people, the environment and property and can reduce the overall impact of an emergency or spill. Response actions and mitigation procedures undertaken at the time of an incident can ultimately influence the duration, magnitude and extent of consequences.

While it is important to initiate the following measure as soon as possible they should be commenced only if it is safe to do so.

The safety of the public and Compass personnel shall be the primary response objective.

- Immediately extinguish all incipient fires if trained to do so.
- Isolate or Initiate emergency shut down procedures on all equipment and remove all potential sources of ignition when there has been a potential release of natural gas or other flammable material.
- Isolate all site drainage in effort to contain any pollutant from discharging into municipal sewers or surface waters.
- Where site drainage is facilitated via ditches / culverts utilize available materials and/or equipment to establish berms or containment structures.
- Utilize sorbent pads / booms to contain petroleum product where appropriate.
- Coordinate a staging area for activated response resources.
- Notify immediate stakeholders e.g. neighbouring properties; if safe to do so, of any potential hazard.

10.6 Response Communication

10.6.1 Initial Compass Notification and Activation

As noted, a building Superintendent / Assistant Superintendent will receive the first notification of an incident. The magnitude of the incident will dictate additional notifications to Compass management.

To facilitate information exchange and coordination additional notifications and collaborations may occur through the use of the Microsoft (MS) Teams platform. An ‘incident specific chat’ may be initiated to support the Incident Management Team until an onsite presence / command post has been established.

10.6.2 Incident Management Communications

Until an onsite presence / command post has been established Compass shall utilize MS Teams to support incident management communication. The MS Teams platform may be utilized in conjunction with other communication systems to maintain situational awareness with communication with remote staff supporting the response.

10.6.3 Incident Management Documentation and Situational Awareness

Situational Awareness

The Compass Planning Section Chief or delegate (Information Officer) shall upon activation to an incident establish a suitable means of communicating and/or displaying incident status information.

Approach should consider the needs of both the command post and the Compass Emergency Operation Centre.

Documentation / Forms

The Ontario IMS system indicates that all actions taken throughout an incident should be documented on standardized Incident Management System Forms. Compass Management has committed to the use of Incident Command System (ICS) Forms which are readily available digitally and in a fillable PDF format.

Consider utilizing the following forms:

ICS 201 – Incident Brief Form

ICS 214 - Activity Log

ICS 207 – Incident Organization Chart

ICS 208 – Safety Message / Health & Safety Plan

ICS 211 – Incident Check-in List

All ICS forms can be accessed and/or printed from the U.S. Federal Emergency Management Agency website

https://training.fema.gov/icsresource/icsforms.aspx

11 Hazardous Materials

11.1 Hazardous Materials In Use

Compass during the operation and maintenance of its facilities may utilize substances that may be deemed hazardous, e.g., electrolyte, glycol coolants, gasoline, diesel fuel, paint/paint thinners, lubricants, etc.

11.2 Product Safety Data Sheets

Product Safety Data Sheet (SDS) for products used by Compass system are available through Compass's Maintenance Group by contacting: **416-492-7800**, CANUTEC, online at the following website(s) or in the SDS binder at the Compass facility. In the event of a response emergency personnel and response contractors upon arrival at site will be briefed via the incident safety plan on all specific hazards for the product involved.

11.3 CANUTEC

CANUTEC is a national advisory service that assists emergency response personnel in handling dangerous goods emergencies on a 24/7 basis. The emergency centre is staffed by bilingual scientists specializing in chemistry or a related field and trained in emergency response. The emergency response advisors are experienced in interpreting technical information from various scientific sources including Safety Data Sheets (SDS) in order to provide pertinent and timely advice.

CANUTEC using their information network as well as their professional experience, judgement, and knowledge, CANUTEC 's advisors can provide immediate advice over the phone and recommend actions to be taken, and those to avoid, in dangerous goods emergencies. The following information or services that can be obtained by calling CANUTEC:

- chemical, physical, and toxicological properties of dangerous goods;
- possible product incompatibilities and stabilities;
- health hazards and first aid measures;
- fire, explosion, spill, or leak mitigation techniques;
- remedial actions for the protection of life, property, and the environment;
- isolation and evacuation distances;
- donning of personal protective clothing and equipment and their decontamination procedures;

CANUTEC may be contacted by calling ***(1-888-CAN-UTEC / 1-888-226-8832 or 613-996-6666).*** *Additionally, emergency response information* may be retrieved from the Transport Canada Emergency Response Guidebook.

12 Response Safety Management

At the onset of an emergency the Compass Incident Commander will identify whether there are significant risks associated with the incident or with the response effort to the incident. Should there be significant safety risks associated with the response the Incident Commander should identify a Safety Officer to provide support. The following NIMS ICS forms will support the identification of potential safety risks and the development of protective measures. Particular care and attention shall be given to:

- Working in hazardous environments (heights, confined spaces, etc.);
- Potential hazardous material exposures (combustion byproducts, motor fuels, etc.)
- Personal Protective Equipment to be worn;

ICS Forms

- Incident Action Plan Safety Analysis
- ICS 208 Safety Message / Health & Safety Plan

12.1 Personal Protective Equipment

Person Protective Equipment (PPE) selection will be determined by the Incident Command. The correct level of PPE will ensure that responders are protected from any potential hazard. Protective clothing is designed to reduce or eliminate the exposure of responders to chemical and physical hazards. In the event an incident involves hazardous material refer to its product Safety Data Sheet (SDS) for recommended PPE when handling the material.

The minimum level of PPE for Compass personnel responding to an incident should include but limited to:

- A durable protective outerwear;
- Activity specific hand-protection;
- Safety glasses or equivalent personal eyewear; and,
- CSA-approved steel-toed shoes or boots.

12.2 Decontamination

Decontamination is the process of removing or neutralizing contaminants or substances that have accumulated on personnel and equipment. Decontamination protects workers, the public and the environment from hazardous substances that may contaminate protective clothing, tools, vehicles, and other equipment used.

12.2.1 Decontamination Methods

All personnel, clothing and equipment leaving the incident site must be decontaminated to remove any harmful substances or physically remove contaminants; and/or isolate contaminants by removing protective equipment and appropriately managing it as an appropriate waste.

12.3 Incident Stand Down

The decision to end the response to an incident and shift to a recovery, long-term remediation or monitoring operation is made by the person having authority over the incident in consultation with the other Unified

Command members. The decision is based on an assessment of response operations and incident status to determine if there is any probability of the escalation of the incident. This decision shall be facilitated in collaboration with the authority having jurisdiction.

13 Emergency Notifications & Reporting

If there is an imminent threat of fire, explosion or to the safety of tenants or the public immediately notify municipal emergency services.

Call 9-1-1

If remote from the scene of the emergency report the incident via the identified non-emergency number (bold / Italic). Identified in ***Appendix E – Emergency Notifications***

13.1 Reportable Events

Upon an event that meets any of the following definitions notification shall be conducted forthwith / immediately upon implementation of life safety protection efforts.

- An unintended or uncontrolled spill of any substance that is abnormal in quality or quantity that causes or may cause an adverse effect, in light of all circumstances of the discharge.
- Any serious electrical incident that causes a critical injury or death, results in a fire or explosion, any condition suspected of being electrical in origin or any electrical contact with electrical equipment operating at over 750 volts.

13.2 Regulatory Notifications

Upon implementation of life safety protection efforts the Compass Incident Commander or delegate shall conduct the required notifications in accordance with the authority having jurisdiction and its applicable legislation.

Contact Information is located in ***Appendix C***.

The following authorities and/or stakeholders shall be advised of the incident and the current state of response.

- Ministry of the Environment, Conservation and Parks (MECP)
- Ontario Electrical Safety Authority (ESA)
- The municipality within the boundaries of the emergency incident.

This notification may be conducted locally via 9-1-1 for emergency services or remotely via non-emergency contact number(s) for municipal, regional municipal or county emergency and public-work services.

13.3 Advisory Notifications

In the event of an emergency that has the potential for off-site impacts Compass shall take all measures to notify and/or advise stakeholders of emergency actions, e.g. Notify tenants of adjacent buildings, adjacent landowners, or business owners that an incident has occurred and may result in impact to their safety and/or operations.

13.4 Labour Accidents

In the event of a critical injury or death a Compass employee or contractor during an emergency or other event Compass shall immediately conduct the applicable notification(s). A critical injury is generally defined as any one of the following:

- Results in death or places life in jeopardy.
- Produces unconsciousness.
- Results in substantial loss of blood.
- Involves the fracture of or part of a leg or arm.
- Involves the amputation of or part of a leg or arm.
- Consists of burns to a major portion of the body.
- Causes the loss of sight in an eye.
- Results in lost time or the need to modify work beyond the date of accident.

13.5 Labour Notifications

Upon implementation of life safety protection efforts secure the scene and/or any equipment involved in the accident. The Compass Incident Commander or delegate shall conduct the required notifications in accordance with the authority having jurisdiction and its applicable legislation.

*Contact Information is located in **Appendix C**.*

The following authorities and/or stakeholders shall be advised of the incident and the current state of response.

- Ontario Ministry of Labour Ministry of Labour, Training and Skills Development

13.6 Emergency Notification Information

The following is a list of information that should be provided to the respective Officer receiving the emergency notification. Keep in mind not all information will be known, and additional notifications may be required as the response progresses.

- A description of the location where the incident occurred and, if known, the municipal address of the location.
- The date and time that the incident occurred or was discovered.
- The names and telephone numbers of everyone who was contacted to respond to the incident, including any fire department, police department or other public authority.
- The duration of the incident and whether the incident is ongoing.
- If the incident involves the release of a pollutant, describe the release, the quantity released and known hazards associated with the pollutants.
- Any relevant information regarding the cause of the incident, if known, and the circumstances surrounding the incident.
- A description of any adverse effects that occurred or may occur.
- Any actions that were taken or will be taken to prevent, eliminate and amend the adverse effect and recover from the incident or if a release of a pollutant; to restore the natural environment.
- Any impact of the incident on other properties?

- If the incident has impacted other properties has the responsible party been provided access to those properties to prevent, eliminate and amend the adverse effect or to restore the natural environment; in the event of a release of pollutant.

14 Response Management

In most cases, emergencies that Compass will respond to will be considered short-term responses that are relatively small in scope and/or duration and require few external resources. These incidents will be generally managed by the Compass workforce and/or maintenance staff. In the event of a more significant incident which might entail greater engagement of Compass and external resources Compass will; as noted, activate its Incident Management Team and follow IMS principles for incident management.

The following sections briefly describe the expanded response efforts of Compass in terms of the IMS structure.

14.1 Command Staff

14.1.1 Incident Commander

The Compass Incident Commander is responsible for the overall management of Compass's responsibilities associated with the response to the incident. Key responsibilities (as appropriate to the specific incident) include:

- Clarifying Compass's role and responsibility within the response;
- Establishing an effective interface with the other Stakeholders;
- Identifying objectives for the response;
- Reviewing and approving all response plans;
- Ensuring effective integration of all external resources into one response plan;
- Ensuring that the response has adequate staff and other resources to develop and implement the response plans;
- Ensuring that safety of all personnel involved is well managed;
- Acting as Compass's chief spokesperson with the public and media;
- Ensuring community concerns and claims are effectively managed; and
- Ensuring appropriate documentation of all decisions, resources and activities.

The Compass Incident Commander should be staffed by a member of the regional Compass Incident Management Team.

14.1.2 Information Officer

The Compass Information Officer or delegate shall be responsible for implementing a communications plan during any emergency incident. They shall be responsible for developing and releasing information about the incident to the public, news media and incident personnel through media or briefings.

The Information Officer in coordinating external communications shall consider the following:

- Provide information about the incident and the associated response to all stakeholders in a timely, accurate, and responsible fashion.

- Ensure that information about the incident is clear, factual, and consistent with that provided by engaged government agencies.
- Manage Compass's digital communication assets, including websites and social media channels. This may include monitoring social media platforms for event coverage, information requests and misinformation.
- Provide information to the public and impacted businesses regarding the submission of eligible claims.
- Maintain internal communications by supporting the sharing of information between the Incident Command and Compass's Crisis Management Team / Leadership.

The Compass Information Officer should be staffed by a member of the Compass Incident Management Team.

14.1.3 Liaison Officer

The Compass Liaison Officer or delegate shall be responsible for effectively coordinating with participating organizations (assisting and cooperating agencies) and stakeholders in support of the incident.

The Liaison Officer in coordinating with participating organizations shall consider the following:

- Develop and maintain a Stakeholder Coordination or Outreach Plan.
- Serve as the primary incident point of contact for Agency Representatives.
- Maintain a list of assisting and cooperating agencies and Agency Representatives including name and contact information.
- Establish and coordinate interagency contacts.
- Keep assisting and cooperating agencies and other stakeholders supporting the incident aware of incident status.
- Monitor incident operations to identify current or potential inter-organizational problems
- Serve as primary point of contact for all stakeholders who are not represented on the incident management team and ensure their concerns, input, objectives, and issues are effectively addressed by the response effort.

The Compass Information / Liaison Officer should be staffed by a member of the Compass Incident Management Team.

14.2 General Staff

14.2.1 Operations Section

The Operations Section shall be responsible for the oversight of all tactical response efforts. These include all contractors that supply resources in response to the incident. In the event of a unified command approach this may require coordination with resources from the municipal fire service, law enforcement and emergency medical service.

The Operations Section Chief should be staffed by a member of the Compass Incident Management Team.

14.2.2 Planning Section

The Planning Section shall be responsible for maintaining situational awareness and the development of the Incident Action Plan (IAP) and any sub-plans e.g., evacuation/shelter management, environmental, etc. Compass will rely on the capacity and expertise of its consultants to support the development of the IAP and sub-plans.

The Planning Section Chief should be staffed by a member of the Compass Incident Management Team.

14.2.3 Logistics Section

The Logistics Section shall be responsible for providing support to the incident response in terms of purchasing and resource management services associated with the delivery of the response. This may include contract management and oversight of service or material suppliers.

The Logistics Section Chief should be staffed by a member of the Compass Incident Management Team.

14.2.4 Finance & Administration Section

The Finance & Administration Section shall be responsible for providing support to the incident response in terms of finance, purchasing and administration services associated with the delivery of the response. This may include contract management, time and cost oversight and management of claims.

The Finance & Administration Section Chief should be staffed by a member of the Compass Incident Management Team.

14.3 Consequence Management

Potential consequences will be incident specific and should be identified as early into a response as possible. Ideally, potentially high consequences areas will have been pre-identified by Compass through various emergency preparedness efforts. These should be addressed immediately upon response to an incident with offsite impacts.

14.4 Public Information Management

Information management during an emergency is a crucial part of incident management. Compass recognizes the value in gathering reliable data regarding the incident and of the mitigation and response activities being conducted by Compass and its contractors and regarding the consequences associated with the incident. Compass should tailor information products to meet the needs of the impacted stakeholders, which will also assist impacted parties make appropriate decision-making at all levels. The Compass Information Officer shall be responsible for overseeing information management during an emergency management incident. All Compass personnel shall be familiar with the Information Officer roles and responsibilities.

15 Response Management Plans

15.1 Incident Action Plan

In the unified command, decisions with regard to the response will be made by consensus and documented through a single Incident Action Plan for each operational period. An IAP formally documents incident objectives in addition to the response strategies defined by the incident command during response planning. The IAP may contain general tactics to achieve objectives within the overall strategy, while providing vital information on response status.

Because incident parameters evolve, the incident action plan must be revised on a regular basis; generally once per operational period, to ensure a consistent, up-to-date message and response direction.

The following should be considered for inclusion in an Incident Action Plan:

- Incident goals (where the response system wants to be at the end of response)
- Operational period objectives (major areas that must be addressed in the specified operational period to achieve the goals or control objectives)
- Response strategies (priorities and the general approach to accomplish the objectives)
- Response tactics (methods developed by Operations to achieve the objectives)
- Organization list with ICS chart showing primary roles and relationships
- Assignment list with specific tasks
- Critical situation updates and assessments
- Health and safety plan (to prevent responder injury or illness)
- Communications plan (how functional areas can exchange information)
- Incident map / Site plan
- Additional component plans, as indicated by the incident.

15.2 Supplemental Plans

15.2.1 Public Health Assessment and Response Plan

In the event of an environmental emergency a Public Health Assessment and Response Plan for airborne risks i.e. Air Monitoring Plan may be required. The responsibility for coordinating the development of an Air Monitoring Plan lies with the Planning Section and may require a technical specialist (consultant) to support its development.

An Air Monitoring Plan should consider the following:

Anticipate and identify potential chemicals of concern from product releases and/or fires that have the potential to impact the health and safety of the public / tenants;

Coordinate development and implementation of incident-specific air monitoring and response strategies to protect the public.

15.2.2 Waste Management Plan

The management of waste from an emergency involving Compass shall be considered a priority. The handling, storage, transport, disposal and tracking of waste associated with a spill shall be coordinated in accordance with all applicable provincial legislation. Responsibility for coordinating with the provincial authorities to develop an incident specific waste management plan lies with the Planning Section. A Technical Specialist may be used to support its development.

15.2.3 Environmental Response Plan

To ensure the protection of the environment, the public, as well as the health and safety of personnel involved in a response involving hazardous products and Environmental Response Plan may be required. The responsibility for coordinating the development of an Environmental Response Plan lies with the Planning Section and may require a technical specialist (consultant) to support its development.

16 Damage Claim Management & Documentation

16.1 Informal Claims Process

A Compass representative coordinating with Incident Command will deploy to the field and immediately begins identifying and communicating with parties that are either directly affected by the incident or close enough to justify being briefed on the incident. This representative shall have the authority; in coordination with the Compass Compensation / Claims Specialist, to immediately compensate or make arrangements with affected parties to mitigate the consequential impact of the event has had on their lives or businesses e.g., establish short term accommodations, provision of water, groceries or other essential services. Alternatively, this may include payment for some immediate services e.g., boarding of household pets, travel costs to stay with relatives, etc.

16.2 Formal Claims Process

In the event that the informal process cannot settle a claim a formal process shall be activated.

With support from its Claims Adjuster Compass will advertise for damage claims through an acceptable method. Claims information and documentation will be made available through a claim centre, the incident command post or via the internet. Compass claims approach shall be defined by the magnitude of the incident and the anticipated number of claims related to the incident.

16.3 Incident Documentation

As part of Compass's utilization of the Incident Management System when responding to any real and/or potential emergency Compass will use U.S. FEMA recognized ICS forms.

https://training.fema.gov/icsresource/icsforms.aspx

An extended incident response will result in the activation of the Compass Incident Management Team and the establishment of a response planning cycle guiding the development of an Incident Action Plan. All incident management documentation associated with the response shall be submitted to the established Documentation Unit and secured in an accordance with Compass's document retention policies, ensuring their availability to support the generation of after-action reports or as evidence in any discipline action or assessment.

16.4 Post-Incident Reporting and Debrief

Compass will assess all responses to incidents, hazards and near misses. Where consequences are deemed significant an After-Action Report which focuses on the effectiveness of the response of Compass and any involved contractor utilized emergency procedures and supporting documents. Additionally, with the support of subject matter experts, Compass may investigate the cause of the incident and establish corrective actions.

17 Municipal Fire Protection

Attention: If there is an imminent threat of fire, explosion or consequence to public safety immediately notify municipal emergency services. ***Call 9-1-1.***

17.1 Municipal Fire Protection

Compass manages BESS operations within two (2) municipalities in the Province of Ontario. The following tables describes the fire service capacity in each municipality which Compass operates and the municipal fire protection infrastructure in proximity to Compass facilities. **Appendix E** defines the applicable notification phone numbers for municipal emergency services.

Table 17-1 – Municipal Fire Protection Capacity

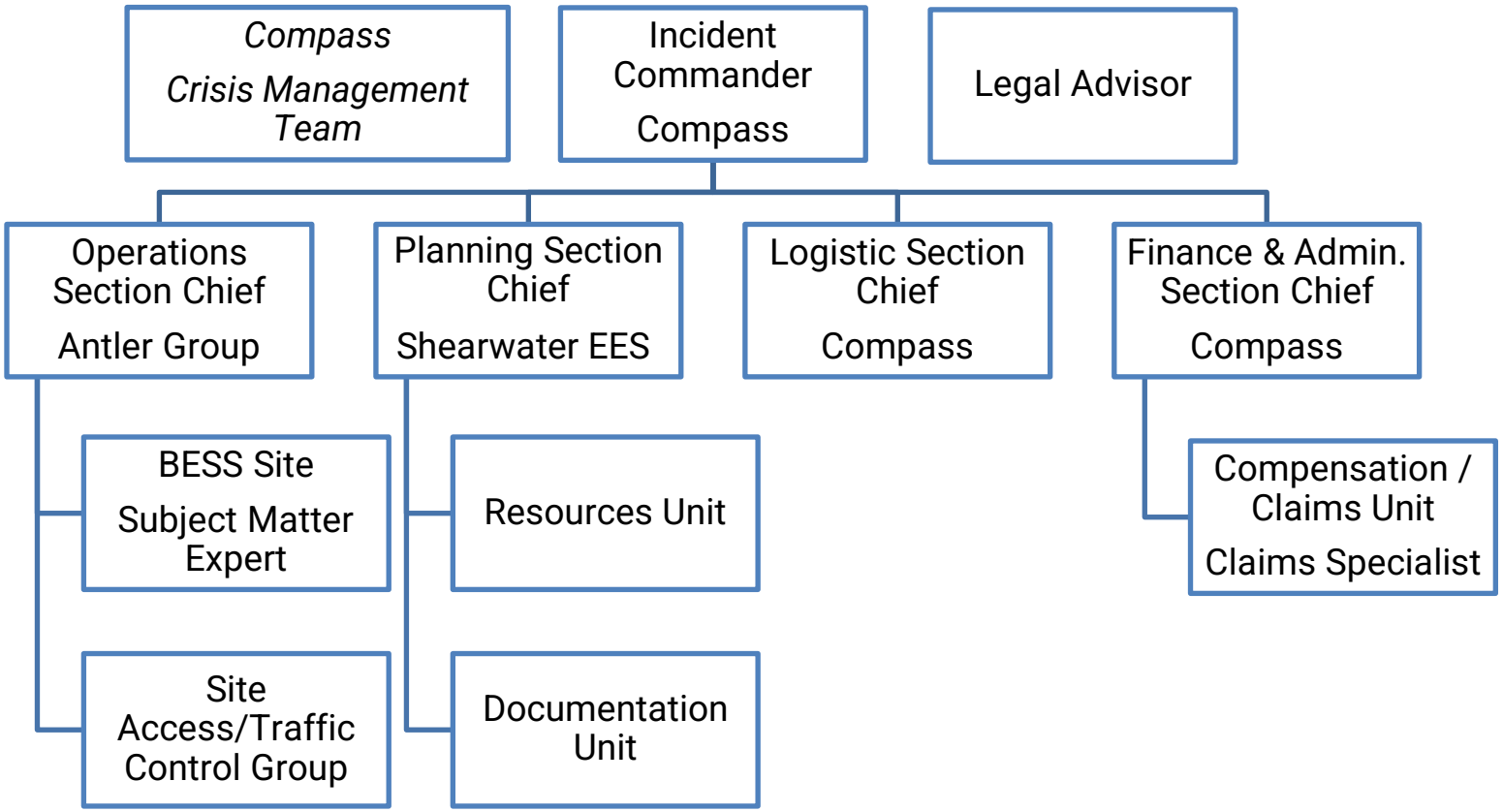
Municipality	Fire Service	Suppression Services
Municipality of Mississippi Mills	Mississippi Mills Fire Department	Two Stations (Almonte & Pakenham) Volunteer Service (48 staff + leadership), Tanker Shuttle Accreditation
City of Windsor	Windsor Fire & Rescue Services	Full service, Local hydrant(s)

Appendix A – Compass Offices and Personnel

Offices & Services	Contact Number
Compass Greenfield Development Suite #506, 192 Spadina Ave., Toronto	416-937-2821
Compass Energy Consulting Suite #506, 192 Spadina Ave., Toronto	905-940-1718 (Office)
Workbench Energy Suite #301, 4A Hazelton Ave., Toronto	888-523-5620 // 647-293-1890

Personnel / Incident Management Team	Contact Number
Cody McNeil *Workbench Energy*	888-523-5620 // 647-293-1890 cody.macneil@workbenchenergy.com
Scott Gerylo *Compass Greenfield Development*	416-937-2821 scott@compassenergyconsulting.ca
Elijah Gerrett *Compass Energy Consulting*	905-971-9753 elijah@compassenergyconsulting.ca
Jon Cheszes *Compass Energy Consulting & Greenfield Development*	647-812-7320 jon@compassenergyconsulting.ca
Pamela Drappel *Compass Energy Consulting*	647-812-7320 pamela@compassenergyconsulting.ca

Appendix B – Compass Incident Management Team


Compass
Crisis Management Team
Incident Commander
Compass
Legal Advisor
Operations Section Chief
Antler Group
Planning Section Chief
Shearwater EES
Logistic Section Chief
Compass
Finance & Admin. Section Chief
Compass
BESS Site
Subject Matter Expert
Resources Unit
Compensation / Claims Unit
Claims Specialist
Site Access/Traffic Control Group
Documentation Unit

Appendix C – Agency Contact Information

Agency Contact Information

Ontario Agencies	Contact Number
Ontario Ministry of the Environment, Conservation and Parks - Spills Action Centre	Environmental Spill Reporting: 416-325-3000 / 800-268-6060
Technical Standards & Safety Authority	Via MECP Spills Action Centre 416-325-3000 / 800-268-6060
Ontario Ministry of Labour, Training and Skills Development – Health & Safety Contact Centre	877-202-0008
CANUTEC [Dangerous goods technical support]	888-226-6666 *666 from a cell phone
Ontario One Call (Utility Locates)	800-400-2255

Saskatchewan Agencies	Contact Number
Saskatchewan Ministry of Environment – Spill Control Centre	Environmental Spill Reporting: 800-667-7525
Saskatchewan Workers Compensation Board	800-787-9288
CANUTEC [Dangerous goods technical support]	888-226-6666 *666 from a cell phone
Sask One Call (Utility Locates)	866-828-4888

Appendix D – Emergency Response Contractors & Consultants

Emergency Response Contractors / Consultants

Contractors	Contact Numbers
Compass Greenfield Development	416-937-2821
Workbench Energy	888-523-5620
Black & McDonald – Ottawa *(Electrical Services Contractor)*	613-526-1226
Black & McDonald – London *(Electrical Services Contractor)*	519-681-4801
Tesla Energy Technical Support Contacts *(BESS Equipment SME)*	650-681-6060
Antler Group *(Emergency Response Contractor)*	647-707-0497
Shearwater Environmental Emergency Solutions Inc. *(Emergency Management Consultant)*	416-525-4600

Appendix E – Municipal Contact Information

Municipality of Mississippi Mills (Almonte BESS)	Contact Numbers
Almonte Fire Department	613-256-2064 #7
Ontario Provincial Police – Carlton Place Detachment	613-257-5610
Mississippi Mills Roads and Public Works	613-256-2064 #401
Hydro-One Networks Inc.	800-434-1235
Ottawa River Power Corporation – Almonte Office (Electrical Utility)	613-256-3722 (M-F) 877-332-3316 (Emerg.)

City of Windsor (Walker BESS)	Contact Numbers
Windsor Fire and Emergency Services	519-253-6573
Windsor Police Service	519-258-6111
City of Windsor Public Works (Roads, Sewers, etc.)	519-255-2489
EnWin Utilities Ltd. (Electrical Utility)	519-255-2727