# Report on Trans Mountain's COVID-19 Preparedness, Planning & Response

# FOR TRANS MOUNTAIN

March 26, 2021 Version 8.0





Trans Mountain Pipeline ULC

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# **1** EXECUTIVE SUMMARY

This is Version 8 (dated March 25, 2021) of Trans Mountain's COVID-19 Preparedness, Planning and Response Report. All previous versions of this Report are available on the Trans Mountain's website (<u>www.transmountain.com</u>) and distributed to Indigenous communities and stakeholders. Previous reports outline the various protocols, regulatory oversight, third-party relationships, training and measures implemented – including those specific to Indigenous communities.

This Report covers Trans Mountain's existing operating pipeline system (TMPL), the Trans Mountain Expansion Project (TMEP) and the current state of COVID-19 within Trans Mountain's overall workforce<sup>1</sup>.

TMPL is an essential service providing needed transportation for a vital commodity in the Lower Mainland of British Columbia, Washington state and access for Alberta oil and petroleum resources to market. TMEP is a federally approved infrastructure project that is in the national interest.

Trans Mountain ("the Company") has implemented industry-leading measures to prevent COVID-19 from spreading within its workforce, within the communities it operates and constructs, and remains confident the operation of the existing pipeline system and construction of the Expansion Project can continue safely.

Trans Mountain is actively monitoring the COVID-19 situation with the help of federal, provincial, local agencies and health authorities, Indigenous communities and industry. The Company is taking appropriate actions with the following key objectives in mind:

- 1. Maintain a safe work environment and ensure business continuity.
- 2. Ensure continued safe operation of the existing pipeline system, and the provision of regular updates to stakeholders including shippers, workforce, Board of Directors, regulators, Indigenous communities and the communities affected by Trans Mountain's operations.
- 3. Ensure continued safe construction of Trans Mountain Expansion Project, and the provision of regular updates to stakeholders including shippers, workforce, Board of Directors, regulators, Indigenous communities and the communities affected by TMEP's construction.

Trans Mountain stood up its Corporate Incident Support Team (CIST) in January 2020, and the CIST continues to be active more than a year later. Trans Mountain started communications about COVID-19 to its workforce on January 31, 2020, and communications are ongoing. The Company officially implemented the Trans Mountain Pandemic Plan on February 27, 2020.

Trans Mountain is constantly monitoring the guidelines from health officials and authorities. The Company remains flexible and agile in making and implementing any necessary COIVD-19 changes. Trans Mountain updates COVID-19 plans and procedures as needed to ensure current practices and requirements are being implemented and followed. Trans Mountain continues to audit and ensure compliance with COVID-19 plans and procedures. Trans Mountain also continues to implement the most stringent guidelines as its standard practice.

<sup>&</sup>lt;sup>1</sup> Note: Trans Mountain workforce includes those in its existing TMPL operations, those working on TMEP and TMEP's construction workforce. The later referred to as Trans Mountain's extended workforce.



Some of the specific measures implemented include:

- Distribution of screening kits to all TMEP field workforce to screen workers as they returned to work.
- Enhanced cleaning and sanitization protocols and increased availability of sanitation supplies.
- Practices that ensure physical distancing guidelines between workers.
- Workforce location management, including offices and field locations.
- Restricted access measures at worksites and offices to ensure a safe workplace.
- Limited in-person meetings.
- Alternate mustering of field workforce from home or remote work locations to minimize interaction with co-workers.
- Staggered lunch and coffee breaks to minimize number of people gathering.
- Rapid Response procedures for the assessment, isolation, and care of anyone showing symptoms.
- Self-monitoring and assessment of physical condition by all workers, whether at site or in the office, is required.
- Self-isolate if symptoms are detected with the supervision/self-report dashboard to be updated immediately.
- Staggered work shifts to minimize the number of people on any given site, including adhering to the recommendations provided by health authorities.
- Limiting travel for execution, supervision or inspection of work.
- Special close proximity procedures including additional hygiene and the use of PPE for those working in close proximity with others when physical distancing cannot be maintained.
- Health screening for entry to job sites including health declaration checklists and temperature testing.
- Careful management of phased office re-population, with appropriate measures to adhere to COVID-19 protocols.
- Maintaining the ability to rapidly respond to any infection encountered in office re-population and pulling back on office migration, if warranted.
- Maintaining work-at-home practices for workforce not yet able to return to office.

A significant number of TMEP's workforce is employed directly through its General Construction Contractors (GCC) and Engineering Procurement and Construction Contractors (EPC) (together the "Contractors"), therefore protocols have been implemented to ensure both the Company and its contractors are creating and maintaining a safe working environment<sup>2</sup>.

Communities, both Indigenous and non-Indigenous, are relying on Trans Mountain to provide safe work and employment opportunities. Economic recovery relies on the approximate 5,000 direct jobs that Trans Mountain brings, while continuing to reliably deliver petroleum to the Pacific Northwest. As such, Trans Mountain has considered the risks to Indigenous and local communities, including health

<sup>&</sup>lt;sup>2</sup> Note: TMEP's Contractor workforce is referred to as Trans Mountain's extended workforce for the purposes of this report.



authorities of jurisdiction, in its planning and execution, and continues to engage, communicate and work with these communities and health authorities to address their concerns.

In addition, Trans Mountain has taken extensive effort at each construction site to reinforce attention to safety as workers may be experiencing some anxiety during construction work due to COVID-19 situation. Daily monitoring of site workers' availability and health status regarding the COVID-19-like symptoms is occurring across the TMPL operation and TMEP. Several contractors have added qualified nurses in the field for monitoring body temperature of those entering the worksites to ensure "fit-for-duty." TMEP Health and Safety field inspectors are actively monitoring, auditing and reporting on physical distancing and other COVID-19 response requirements by contractors.

The world continues to experience increases in COVID-19 cases and strain variations. Globally, people continue to experience significant COVID-19 fatigue as they grow weary of enhanced measures, mask wearing and physical distancing. However, since the publishing of Trans Mountain's last report (Version 7), vaccines have become available globally and immunization has commenced in Canada; including in British Columbia and Alberta.

As part of BC's COVID-19 province-wide immunization plan, workers in high-density locations such as industrial project work sites, including camps, in the Northern Health Authority region are being vaccinated using BC's supply of AstraZeneca – SII Covishield vaccine. Trans Mountain Expansion Project workforces in Valemount were the first to be vaccinated, in addition to four other major projects in the province. Trans Mountain's vaccination sites will include the Valemount Camp, construction yards and other work sites within the Northern Health region.

Vaccination of workers in close proximity industrial settings has been one of the key parts of BC's vaccination strategy, and does not impact the other phases of BC's vaccine plans.

Utilizing the occupational health clinic provider, 24/7 OEMS, for the administration of the clinics, Trans Mountain mobilized nursing and administrative staff for each location of Valemount (Spread 3/4A) and Clearwater (Spread 4B). The vaccine is being administered on a voluntary basis to any eligible worker who meets the criteria for the program.

In Alberta, Trans Mountain has retained the services of HSE Integrated to provide access to the Abbott Labs Panbio COVID-19 Ag Rapid Test Device and to aid in managing a testing program at field locations. Under a Pilot Project in Jasper, AB, the TMEP – HSE COV19 Testing program consists of 5,000 tests provided to TMEP by HSE. With immediate access to an inventory of testing devices, HSE Integrated will be able to deliver a turn-key testing solution and be rapidly deployable, providing testing where it is required, when it is required. Using the Health Canada approved testing device, workers at Trans Mountain locations will be able to get fast, clear results, allowing Trans Mountain to take the appropriate steps to either eliminate or contain a potential outbreak at its worksites.

In March 2021, Trans Mountain entered into an agreement to participate in the Government of Canada's initiative to provide rapid screening kits to employers in critical industries with workers in high-contact settings. Health Canada has provided Trans Mountain with 3,000 BD Veritor System for Rapid Detection of SARS-CoV-2 tests which detect proteins from the SARS-CoV-2 virus. It is the intent to deploy these tests to the field and use them to establish a rapid testing program at Trans Mountain's Burnaby/Westridge facility.



Trans Mountain experienced increased COVID-19 presumptive and confirmed cases leading to more isolations its workforce. This includes those who have declared contact with positive cases or other symptomatic individuals. Until November 20, 2020, Trans Mountain did not have any confirmed workforce transmissions of the virus, with all previous cases having been identified as coming from outside of the work environment. On November 18, 2020, Trans Mountain reported its first positive case within one of its temporary worker accommodations sites leading to the precautionary isolation of four individuals.

As of March 25, 2021, across the entire workforce of Trans Mountain:

- The total number of workers who are suspected of contracting COVID-19 at any Trans Mountain site is 13.
- The total number of workers in isolation pending test results or in isolation based on contact with a presumed COVID-19 case, includes 17 individuals with the extended workforce and four within Trans Mountain's direct workforce.
- There have been 115 confirmed cases of COVID-19 within the Trans Mountain extended workforce, with 106 of those having recovered. Trans Mountain's direct workforce has had 26 confirmed cases, with 25 individuals having recovered.

## **Current Status**

This report (Version 8) summarizes the current cases, the details of the implementation of COVID-19 protocols and current work activities being undertaken by Trans Mountain to manage this pandemic within its workforce. This is an ever-changing and dynamic situation. Trans Mountain continues to implement guidelines and best practices as they become known.



## As of March 25, 2021:

## Figure 1



## Figure 2







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# **2** SITUATION SUMMARY

On March 19, 2020, the World Health Organization (WHO) declared COVID-19 was a pandemic affecting the world in unprecedented ways.

As Trans Mountain's existing operating pipeline system (TMPL) has been declared an "essential" service and construction of the Trans Mountain Expansion Project (TMEP) is an "approved industrial project," Trans Mountain has developed and implemented actions and protocols to ensure operations and construction are occurring safely and are consistent with industry, federal, provincial and community rules and recommendations. Such safe practices continue to evolve reflecting changes in available equipment and changes in virus status and will continue to change as Canada returns to normality postvirus.

This is Trans Mountain's eighth update to its Report on Trans Mountain's COVID-19 Preparedness, Planning and Implementation. Each version has been provided to Indigenous communities and stakeholders and is available on the Trans Mountain's website - prominent on the home page.

Alberta and British Columbia now have readily available public health COVID-19 testing for anyone showing symptoms. The total number of workers who have contracted COVID-19 at any Trans Mountain workplace or site is 13. Trans Mountain has had 141 cumulative confirmed positive cases of COVID-19. To date, 26 of these cases referenced above were within the direct Trans Mountain workforce, and the remainder are within the extended TMEP workforce.

Contact tracing is conducted for each positive case or presumptive case, and any close contacts are required to execute a period of isolation as directed by the jurisdictional health authority. Prior to return to work on TMEP, workers must be cleared for fit-for-duty by the Jurisdictional Health Authority, a physician providing care, or the Trans Mountain medical doctor.

Trans Mountain is committed to public safety, protection of the environment and operation of its facilities in compliance with all applicable rules and regulations. As a company regulated by the Canada Energy Regulator (CER), Trans Mountain has an Emergency Management (EM) Program that anticipates, prevents, manages and mitigates conditions during the unlikely event of an emergency. The Emergency Management Program is also responsible for Business Continuity Planning which includes crisis response and pandemic planning.

The Crisis Management Plan (CMP) provides a framework to manage a wide range of crises, from operations-based incidents to business disruptions. The CMP is intended to provide flexible solutions to a variety of crisis scenarios which lends support to detailed response procedures such as those found in the Emergency Response Plans for spills or fires. The Pandemic Plan supports the CMP and serves to minimize impacts to workers or contractors from illness and reduce risks to critical business functions. Pandemic planning assumptions and recommendations have been included for business continuity planning. Employers play a key role in protecting their workforce's health and safety during pandemics. Trans Mountain is a critical infrastructure operator and has planned for continued operation and response capabilities during all types of crisis, including a pandemic.

Trans Mountain stood up its Corporate Incident Support Team (CIST) in January 2020, and the CIST continues to be active more than a year later. Trans Mountain started communications about COVID-19



to its workforce on January 31, 2020, and communications are ongoing. The Pandemic Plan was officially implemented on February 27, 2020.

Trans Mountain defined objectives for its COVID-19 Response to ensure it was considering the important and unique nature of the Company's operations and the Expansion Project, as well as key stakeholders. Trans Mountain's objectives are and continue to be:

- 1. Maintain a safe work environment and ensure business continuity.
- 2. Ensure continued safe operation of the existing pipeline system, and the provision of regular updates to stakeholders including shippers, workforce, Board of Directors, regulators, Indigenous communities and the communities affected by Trans Mountain's operations.
- 3. Ensure continued safe construction of Trans Mountain Expansion Project, and the provision of regular updates to stakeholders including shippers, workforce, Board of Directors, regulators, Indigenous communities, health authorities and the communities affected by TMEP.

Trans Mountain continues to take primary guidance from the health agencies with jurisdiction over the areas in which it is operating and constructing. Each province is responsible for managing its response to COVID-19 and implementing measures accordingly. With Trans Mountains operating and constructing predominately in Alberta and British Columbia, in the case where protocols or restrictions vary by jurisdiction, the Company has implemented the most stringent measures identified across all its workforce.

Trans Mountain continues to monitor any changes made by health agencies and or governments in relation to the pandemic and incorporates all requirements as necessary.

## Province of British Columbia

On November 20, 2020, British Columbia implemented new protocols intended to break the chain of infection by reducing social interactions and travel. The Provincial Health Officer spoke of the health care system approaching capacity, if current rates of spread remain out of control. New restrictions apply throughout B.C. and continue to be in place with no known end date.

On January 12, 2021, B.C.'s Provincial Health Officer issued two Orders:

- 1. Order of the Provincial Health Officer Industrial Projects Restart January 12, 2021
- 2. Order of the Provincial Health Officer *Resource Sector Worksites and Industrial Camps in the Region of the Northern Health Authority January 12, 2021*

These are in addition to the July 2, 2020 Industrial Camps Order. Trans Mountain continues to adhere to these Orders and its Restart Plan in response to item (1) above was provisionally approved by Northern Health and the Provincial Health Officer on February 5, 2021 and approved with one condition, two recommendations and general comments on March 3, 2021. Trans Mountain will be submitting its respond to the condition and recommendations by April 6, 2021; the deadline set by Norther Health Authority.

#### Province of Alberta

On November 24, 2020, Alberta announced it had reached a precarious point where the number of infections continues to rise and spread faster and more widely than at any other point in the past nine

months, thus straining the public health system. While some may have considered the worst of the pandemic in the past, it has become clear the virus has spread much more rapidly throughout the province in the past several months.

In response to this significant rise in infections, Premier Jason Kenney declared a state of public health emergency and introduced a series of targeted measures impacting social gatherings, places of worship, businesses and schools.

Starting on February 8, 2021, Alberta implemented a 4-step approach to easing restrictions. The movement from one step to another is dependent on hospitalization numbers and other leading indicators. The easing of restrictions which would see changes to office occupancy at Trans Mountain comes in step 4, and this is not anticipated to occur sooner than April 12, 2021.

### Temporary Worker Accommodation

COVID-19 protocols for temporary workforce accommodation camps have been of specific focus for Trans Mountain in the planning, lead up to opening and re-opening. Currently, Trans Mountain has three operational temporary worker accommodation sites in B.C.: Valemount, Clearwater and the Ohamil Camp (also known as the Sqemel Lalem Camp) near Hope, B.C.

The first positive case of COVID-19 at a Trans Mountain temporary worker accommodation camp was identified on November 20, 2020 at the Valemount Camp. The individual had returned from days off and was in the Camp for one day prior to being notified of a close contact outside of the camp with a positive case. The worker immediately went into isolation in a specific wing of the camp which is designed for isolation. Contact tracing was implemented and, as a result, four additional workers voluntarily entered self-isolation. No infection spread resulted.

Trans Mountain continues to enforce and ensure COVID-19 protocols are of the highest standards within its Camp Communities. Each exit and entry to the Camp requires temperature testing and masks are mandatory in all areas of the Camps. The only exceptions are when a person is eating or drinking in the dining room.

Each Trans Mountain temporary workforce accommodation site has an isolation wing that allows for anyone experiencing any type of illness be safely quarantined/isolated. These wings have separate air circulation systems and have appropriate protocols to ensure those in isolation are being monitored and provided with all the essentials needed.

The Company has also seen cases being reported by its sub-contractors where the workforce has either self-identified themselves as having contact with presumptive and or positive cases outside of the worksites or are experiencing COVID-19-like symptoms. These individuals have been placed in isolation and are included in the TMEP numbers noted above.

## 2.1 WORKFORCE PLAN

On March 12, 2020, Trans Mountain identified that for continued worker safety and ensuring business continuity, a widespread work remotely strategy should be implemented. The Work Remotely Strategy was put into effect on March 15, 2020 and by March 19, 2020, Trans Mountain implemented its remote



work plan with full support for working alone and updated guidance on safety at non-work locations. Exceptions were made for some workers whose job function could not be performed from remote locations, including the Control Centre, mail room, reception and IT service desk.

In late November 2020, the B.C., Alberta and Washington State governments announced further restrictions to help curb the spread of COVID-19. These new protocols had limited impact on Trans Mountain's construction or operations. Trans Mountain implemented additional actions the week of November 23, 2020 to ensure adherence enhanced protocols. These included:

- Travel restrictions remain in place: Only essential business travel is allowed with supervisor approval. Essential travel includes travel to do, to supervise or to inspect work. Special close proximity procedures including additional hygiene and the use of PPE for working in close proximity with others when physical distancing cannot be maintained.
- Mandatory mask use is in place at all work locations (e.g. meeting rooms, hallways, washrooms, kitchens etc.). Workers may remove their mask only when they are alone at their workspace.
- Requested that workers remain diligent in adhering to all COVID-19 protocols away from the worksites; spread in social settings is increasing and individuals need to remain focused when away from work.
- Workers have been asked to eliminate car-pooling unless masked, eliminate gatherings over lunch and coffee breaks and ensure they remain at home if they are sick.
- Rolling back return to office efforts across its offices by instructing the workforce to work from home until further notice wherever possible. Some exceptions have been made based on job function similar to March of 2020. Trans Mountain's current office occupancy is approximately 10 per cent.
- Stressing that 'safe cohort' does not include work colleagues and asking the workforce to avoid workplace social interactions such as team coffee breaks, breakfast or lunch gatherings or carpooling.
- Holiday social functions for work groups are not permitted, including formal and informal holiday parties or luncheons.

Trans Mountain continues tracking the health of its workforce throughout the COVID-19 pandemic using an internal digital reporting tool. This tool is a self-service portal accessed via the intranet site for the workforce to report weekly its health status. The extended workforce (construction contractors and sub-contractors) health is tracked by the contracting company and reported to Trans Mountain supervisors on a daily basis to monitor the wider workforce availability and health.

## 2.2 ENGAGEMENT

## 2.2.1 Associations and Industry Engagement

Trans Mountain is a member of several organizations and associations. Trans Mountain is participating in COVID-19 industry forums virtually during the pandemic to share information, check procedures, and compare leading practices through regular contact with the agencies and their members.



## 2.2.2 Coordination with Health Authorities

Trans Mountain has regularly engaged with the health authorities where its operations and TMEP work, including the First Nations Health Authority (FNHA). Co-ordination calls, which include Trans Mountain, are organized by Emergency Management BC and led by the respective health authority (Northern Health, Interior Health, Fraser Health and Vancouver Coastal Health), are now taking place as needed when there are changes in public health policy.

Trans Mountain has met with the FNHA to share information about its various pandemic management programs and systems in general, and in relation to the temporary worker accommodations on Reserve at Ohamil, a Shxwowhamel First Nation Reserve. Topics discussed and information shared with the FNHA includes matters such as:

- Trans Mountain COVID-19 Response Plan
- Trans Mountain COVID-19 Self-Declaration and Guidance
- Trans Mountain Site Access Temperature Screening Protocol
- Trans Mountain Safety Precautions When Working Within 2m of Other Workers
- TM COVID-19 Camp and Accommodations Guidelines
- Clearwater Camp Guest Welcome Package
- CER Condition 13 June 23, 2017 Filing <u>https://apps.cer-</u> rec.gc.ca/REGDOCS/Item/View/3298049
- Presentation on temporary worker accommodations in general and the associated medical and health services and communicable diseases plans

In response to the issuance of two B.C. Provincial Health Officers Orders, more frequent dialogue and meetings have occurred with various representatives of the Northern Health Authority. Trans Mountain has participated in all the B.C. government-organized industry sessions on COVID-19, in particular related to the Northern Health Authority region.

#### 2.2.2.1 Other Key Stakeholders

As part of its ongoing engagement efforts, Trans Mountain regularly engages with other key stakeholders to provide updates or information about the Expansion Project, including its COVID-19 response. Other key stakeholders can include local governments, community or neighbourhood associations, business associations, and interest groups.

Since March 2020, efforts have been made to provide stakeholders with updates and participate in community events or activities in a way that follows the COVID-19 recommendations and guidelines set out by health officials, and in adherence to Trans Mountain's own policies and protocols. This can include telephone updates, virtual meetings or presentations, emails and calls through its public information desk, newsletters and other channels.



## 2.2.3 Expert Opinion

In April 2020, Trans Mountain retained a medical doctor (referred to as Trans Mountain's Medical Director) to aid in the development, implementation, and review of all COVID-19 response plans and procedures, as well as to provide advice related to ongoing questions as they arise. The medical doctor provides clearance and consultation in confirmed and presumptive COVID-19 cases for TMEP and communicates directly with the occupational health physicians contracted to the temporary worker accommodation camp communities.

The medical doctor is familiar with industrial practices and infectious diseases and is an expert resource with experience providing similar advice to other construction projects across Canada, including those with camp communities, including industrial camps. The medical doctor also provides, verbally and in writing where needed, proactive information and literature based on emerging information so TMEP can adapt and modify its plans accordingly.

The doctor has completed an assessment of medical plans across the Project, including COVID-19 measures, and has a team of professionals currently strategizing an approach to audit the COVID-19 practices being implementation on a site level.

## 2.3 INDIGENOUS ADVISORY AND MONITORING COMMITTEE (IAMC)

Trans Mountain continues to meet regularly and shares COVID-19 information with the IAMC. The Company has met with the following sub-committees in addition to regular meetings with the full IAMC.

- COVID-19 Task Group
- Emergency Management Working Group
- Policy Working Group Indigenous Monitoring
- Socioeconomic Subcommittee

Topics specific to COVID-19 that have been previously raised by these sub-committees, is documented in previous versions of this Report. All COVID-19-related matters are now addressed through the COVID-19 Task Group, established in May 2020. The COVID-19 Task Group has identified two streams of work and Trans Mountain (TMC) participates specifically in Stream A:

- 1. Stream A: TMC Health & Safety Plan Requirements & Reviews has the following priorities:
  - Task 1: Confirm understanding of health and safety regulatory regime and existing directives/standards/guidelines
  - Task 2: Review TMC COVID-19 measures and plans
  - Task 3: Identify and discuss opportunities to collaborate to address residual and unique risks to Indigenous communities
- 2. Stream B: Return to On-site Indigenous Monitoring & Oversight of Occupational Health & Safety (OHS) Performance, includes the following tasks:
  - Task 1: Collaboratively planning compliance verification activities



• Task 2: Developing safe work procedures for IAMC Indigenous Monitors that align with regulator and company OHS plans

The COVID-19 Task Group has also sought clarity on:

- Why and how Trans Mountain contact traces.
- How and when Public Health authorities are contacted about a presumptive case at Trans Mountain.
- What Trans Mountain has implemented with respect to physical distancing, on-site testing, personal protective equipment, worker accommodation and scheduling, construction and operation of work camps, self-isolation protocols or resources for workers before entering sites or returning home to communities, guidance and resources for workers, notification protocols for confirmed cases, and briefing Indigenous Leadership on COVID-19 measures.
- How Trans Mountain ensures worker adherence to policies and requirements.
- Standards related to mask use and supply.
- General Construction Contractor's COVID management programs.
- Protecting individual confidentiality.
- Trans Mountain's COVID-19 response document, which outlines measures specific to Indigenous communities.
- The effect of COVID-19 on Trans Mountain's Indigenous Monitoring Program and its Emergency Management Program.
- Measures taken to protect the health and safety of workers, emergency responders, and Indigenous communities during a spill or emergency. What effect has the pandemic had on Trans Mountain's ability to respond quickly to a spill or emergency? How will Indigenous communities be notified in the event of a spill or other emergency if offices are closed?
- Request for an analysis of any incremental risks posed to Indigenous communities from construction activity (i.e., worker movements or proposed camp workforce by general contractors) and how will these risks be mitigated.
- Reporting confirmed worker infection across the Project, and in context of number of people working in the various spreads where infections are being reported.
- Compliance reporting on Trans Mountain's COVID-19 plans and program.

# 3 REGULATORY OVERSIGHT

#### 3.1 LEGISLATION

Both the federal and provincial governments have a role in overseeing and regulating Occupational Health and Safety (OHS) at Trans Mountain's worksites. As a federally regulated company, the Canadian



Energy Regulator (CER) has jurisdiction over all construction and operation activities, pursuant to the *Canadian Energy Regulator Act*, including harm prevention obligations.

The CER's Onshore Pipeline Regulations (OPR) require companies to manage hazards and their effects on workers and the public in a proactive and ongoing manner and require companies to be compliant with all OHS legal requirements, including any requirements related to COVID-19.

The CER is also responsible for enforcing the Canada Labour Code, applicable to federally regulated workers, including Trans Mountain's workforce. While contractors and sub-contractors fall under provincial jurisdiction, and the purview of the provincial worker safety agencies in B.C. and Alberta, the CER also provides oversight to these contractors through enforcement of Trans Mountain's contractor management and quality assurance programs.

The CER has co-operation agreements in place with both WorkSafeBC and the Alberta Ministry of Labour to co-ordinate and harmonize inspection of TMEP work. On September 29, 2020, the CER released a requirement for reporting of confirmed positive cases of COVID-19 at CER regulated worksites. The required information must be provided to the CER via email within 48 hours of the company being made aware of a positive case. Trans Mountain has consistently complied with this requirement.

The Province of British Columbia has determined that construction, including industrial construction, is an essential service in B.C. Under the B.C. Public Health Act, the provincial health officer (PHO) has the authority to issue directives regarding the safe operation of construction sites and work camps. These directives are enforced by WorkSafeBC in compliance with the Workers Compensation Act and associated OHS Regulation.

The operation of an industrial camp is prescribed as a regulated activity under B.C.'s Public Health Act. A camp operator must comply with the requirements of the Industrial Camps Regulation, which outlines the requirements for several public health-related factors, including camp siting, size, facilities, water, and sanitation.

In July 2020, the B.C. Provincial Health Officer issued an Order and guidance to construction sites and camps operating during COVID-19 that includes specific measures required to minimize the risks of COVID-19 transmission and illness to their workforce. There were updates issued during 2020.

On January 12, 2021, B.C.'s Provincial Health Officer issued two Orders:

- 1. Order of the Provincial Health Officer Industrial Projects Restart January 12, 2021
- 2. Order of the Provincial Health Officer *Resource Sector Worksites and Industrial Camps in the Region of the Northern Health Authority January 12, 2021*

Trans Mountain continues to adhere to these Orders.

This order has been incorporated by Trans Mountain in its three operating Camps, as well as in the planning for operations of its one additional camp communities.

In Alberta, the government has determined that construction related to energy infrastructure is an essential service. The Government of Alberta has issued Guidance for Workplaces that identify many of the same measures as B.C. Occupational Health and Safety (OHS) is enforced in Alberta under the OHS Act, Regulation and Code, and enforced by Alberta OHS.



## 3.2 COMPLIANCE

Given their authority, WorkSafeBC, Alberta OHS and the CER routinely conduct inspections and other compliance verification activities, including worker health and safety. These inspections and reviews continue during the COVID-19 pandemic. The CER continues to conduct compliance verification activities through inspections, additional means of reporting to the CER, additional virtual meetings and program reviews.

The CER is also responsible for ensuring Trans Mountain complies with legally-binding certificate conditions, including the requirement that Trans Mountain develop and implement a Worker Accommodation Strategy and a Health and Safety Management Plan for the Expansion Project.

Trans Mountain continues to make condition compliance submissions to the CER and the CER proceeds to review and accept submissions. The CER and TMEP meet twice per week to discuss ongoing matters related to the Project. Since March 2020, the CER has conducted more than 35 compliance verification activities. A significant portion of these were field inspections. The CER has documented six instances where COVID-19 protocols were observed as not being followed which resulted in non-compliances and corrective actions. This includes a CER Order that was issued to both Trans Mountain Operations (TMPL) and TMEP for improper mask wearing. All actions associated with the Order have been completed and closed by the CER.

# 4 TRANS MOUNTAIN AND TMEP COVID-19 Response

Trans Mountain formalized its specific Trans Mountain COVID-19 Response Plan for including requirements, guidelines and precautions on March 24, 2020. Trans Mountain released an updated COVID-19 Response Plan (Revision 7) on March 4, 2021. The updates include additional clarity around contact tracing requirements and supervisory/contractor oversight subsections, an updated Rapid Response Form, updated requirements for notification of COVID-19 test and return-to-work statuses, and additional specifications around isolation requirements.

The plan is continually reviewed and updated and has been included in Appendix B. In accordance with health authority guidelines, the plan deals with communication and awareness, cleaning protocols, personal protective equipment, physical distancing, site operations, and interactions with communities and landowners. It addresses what workers must do if feeling ill and procedures for returning to work. The plan also defines Trans Mountain's requirements of its Contractors during the pandemic.

Trans Mountain continues to collaborate and co-ordinate the development of the industry-leading guidelines, procedures and protocols across the Company to ensure the continued safe construction of the Expansion Project and operation of the pipeline system. This coordination group is chaired by the Company Director, Environment Health and Safety (EHS) and meets on an ad-hoc basis and more regularly as required. Senior Leadership approve all documents released to the workforce and the contractors. This task force also acts as problem-solver for COVID-19 issues/concerns from the field locations. The task force allows Trans Mountain to maintain a heightened level of knowledge and experience around COVID-19 matters and allow for proactive surveillance of new and changing measures.



The Executive Vice President, TMEP, and Trans Mountain's Chief Operating Officer review and consider all recommendations from the co-ordination team. The Senior Management Committee (SMC) of the Company, chaired by the President and CEO, meets weekly to review, consider and approve any measure or recommendation that has broad implications on the workforce and worker safety policy.

## 4.1 GENERAL REQUIREMENTS

TMEP Site Supervision and Health and Safety teams monitor the implementation and effectiveness of these plans and enforce the requirements contained within. Weekly internal safety inspections are conducted by Health and Safety leads or safety inspectors at all facilities. If any non-compliance is identified, it is documented, and corrective action is undertaken.

These COVID-19 measures have developed rapidly and have been readily accepted by the workforce. Modification and sustainment are supported through training and communication to ensure awareness and to reinforce these new norms. Reporting COVID-19 safety, hygiene and physical distancing wrongdoings are reinforced as part of near-miss reporting.

Trans Mountain workforce and contractors are encouraged to correct behaviours in the field and communicate these events to ensure compliance with Company requirements and continuous improvement.

## 4.1.1 Before Being Permitted on TMEP Worksites

This section provides a summary of what workers must undertake before arriving at any TMEP worksite. This includes existing and future Camp locations.

- 1. Self-Declaration Questionnaire on current symptoms is completed including travel and exposure history (see Appendix C: Trans Mountain COVID-19 Self-Declaration Questionnaire). All employees, contractors and visitors ("individuals") reporting for work at a Trans Mountain worksite must complete a self-declaration/assessment questionnaire prior to accessing any worksite, office, facility or Project right-of-way worksites. The completed form must be evaluated by Trans Mountain site security, a Trans Mountain representative, a First Aid attendant, and/or a third-party Temperature Monitor to ensure fitness for duty and gain clearance to the worksite. The form must be kept with the worker at all times and must be available for display upon request. If conditions or symptoms change, a new form must be completed.
- 2. **Temperature screening** (see Appendix D: Trans Mountain Site Access Temperature Screening Protocol).
- 3. **Declaration** and sign-off (see Appendix C: Trans Mountain COVID-19 Self Declaration Questionnaire, page 2). Version 7 of the form states that as a condition of employment, workers must agree to the following:
  - *i.* The information that I have provided above is true and correct. I will advise Trans Mountain immediately of any changes to this information.



- *ii.* I understand that intentionally providing false or misleading information, or my failure to immediately update any changes to the information provided, may lead to disciplinary action against me (employees and contractors only).
- *iii.* I agree that I will comply with all Trans Mountain COVID-19 procedures.
- iv. I agree that as a condition of my attendance at Trans Mountain offices and/or worksites, I will comply with all Trans Mountain COVID-19 procedures in addition to all relevant government and health authority directives when onsite or offsite Trans Mountain facilities. I agree to provide all required information on close contacts that could be affected while at Trans Mountain facilities or externally when I am engaged in activities for Trans Mountain in the case of my positive or suspected COVID-19 diagnosis.
- v. I agree that if my health status is changed relating to COVID-19, I will inform my employer, Trans Mountain and Health Authorities.

Workers are required to **STAY AT HOME** and self-isolate if they are feeling flu-like symptoms or any of the symptoms associated with COVID-19 (see Appendix B: Trans Mountain COVID-19 Response Plan).

In addition to the above, specific Indigenous community requirements have been implemented across the Project. All workers are required to identify their living location as part of conditions of the self-declaration and in the Response Plan.

#### 4.1.2 Physical Distancing

Trans Mountain field locations, facilities and construction offices are managed to keep different crews/trades and individuals physically separated and to reduce high-traffic areas. Procedures and protocols in effect include:

- a) One-way staircase use is required wherever practical to minimize worker contact; workers are directed to wait for staircases to clear of oncoming traffic before using.
- b) Workers are directed to keep two metres of distance from one another at the worksite including during informal discussions with co-workers, at tailgate meetings, and while physically working.
- c) Meetings must be split into smaller groups to limit exposure to one another and limited to the jurisdictional mass gathering restrictions. Persons attending must be able to adhere to physical distancing. If attendance exceeds physical distancing capabilities, all personnel in attendance must wear face coverings in accordance with the *Trans Mountain Safety Precautions for Working Within 2m of Other Workers* guideline (Appendix E).
- d) In-person meetings are limited to site-based requirements for attendance. Video conferencing should be utilized whenever possible. If using teleconferencing is not possible, meet in larger common areas instead of meeting rooms and limit the number of in-person attendees. Sitebased requirements for PPE usage must be followed.
- e) Mass gathering restrictions are in place that align with local, provincial and federal guidelines.



- f) Appropriate signage that limits the number of occupants in a restricted area (confined space, pipeline excavation, welding area, pig launcher/receiver platform, etc.). i.e. WORKER RESTRICTIONS IN EFFECT.
- g) Coffee and lunch breaks are scheduled to limit exposure of workers to other workers. Eating is restricted to dedicated eating areas. Eating areas must have hand washing stations, cleaning and disinfectant materials, and adequate space to maintain minimum physical distancing.

Control Centre Operators (CCO) are responsible to ensure safe movement of products in the pipeline system and they normally work in proximity. Special measures have been put in place. The CCO shifts continue to be split up with the main and backup locations working concurrently to allow greater distancing. The tertiary back-up also continues to be in place. In addition to the self-reporting, CCOs are also required to check their own temperature before reporting to their shift.

## 4.1.3 Cleaning

Trans Mountain has established hygiene and sanitation guidelines for all workers at Tran Mountain locations. Signage is posted at facility entry points outlining the commitment to maintain all health and safety measures when working for and on behalf of Trans Mountain during the COVID-19 pandemic. All hygiene and sanitation products at Trans Mountain meet requirements set by Health Canada to effectively kill the COVID-19 virus.

Trans Mountain's Central Stores has procured a sufficient supply of hygiene and sanitation products to address current needs. Trans Mountain has also been working with its contractors to procure sanitation products in cases where they are having difficulty. Proper instruction is sent out with each sanitation package to ensure supplies are decanted and diluted to the appropriate concentration and appropriate sanitization times are implemented.

Trans Mountain and its contractors sanitize heavy equipment and vehicle components with sanitizing wipes or bleach solution. A sufficient supply of hand sanitizer has been distributed to Trans Mountain workers. Hand sanitizer is used after filling up vehicles at gas stations, transfer of tools, prior to eating, etc. Trans Mountain has limited the use of shared tools. Sharing pens, computers and passing around tailgate forms to be signed is not allowed. If shared tools are required, there is sufficient bleach solution to sanitize between users. Crews are assigning one person per crew to look after the paperwork and sign others onto sign-in sheets, tailgates and job hazard assessments (JHA). Hygiene practices have been incorporated into all aspects of the day-to-day activities of workers.

Remote facilities and pump stations have sufficient supply of bleach solution, nitrile gloves, towelettes for sanitation of hard surfaces and high traffic/touch surfaces. Surfaces are cleaned at least twice per day, and at the end of the shift in the event of a call-out at night and for returning crews the following morning.

Lunchrooms and all communal areas are cleaned thoroughly on a regular and frequent schedule, and cleaning is reported on a tracking sheet. Access and use of shared devices in lunchrooms, such as coffee machines, water fountains, microwave ovens, and similar, is limited.



Each worksite must have potable water, soap, paper towels, and proper garbage disposal. Alcohol-based sanitizer (containing at least 60 per cent alcohol) must be available as a temporary solution if wash facilities be unavailable.

## 4.1.4 Personal Hygiene

Workers are directed to ensure hand washing, using soap and water for 20 seconds, is done on a frequent basis in the provided wash facilities. If soap and water are unavailable, alcohol-based hand sanitizer (containing at least 60 per cent alcohol) is used. Workers are also directed to follow all other recommended guidelines regarding personal hygiene.

## 4.1.5 Additional Protocols

In addition to basic universal protections such as increased hygiene, self-isolation, and physical distancing, additional protections continue to be implemented in the field:

- **COVID-19 safety protocol training** and awareness is covered at safety and tailgate meetings augmented by workplace safety posters and other communications. An online COVID-19 Trans Mountain Response training package is available to all contractors through their ISNetworld subscription.
- External-facing signage is used at worksites notifying COVID-19 measures are in place.
- Enhanced reporting of workforce availability is in place allowing comprehensive tracking of employee health status, work location, and availability.

## 4.1.6 Personal Protective Equipment (PPE)

Following leading practices and based on TMEP's medical doctor, enhanced PPE continues to be used (masks/gloves) in instances where physical distancing is not possible due to required work tasks (allocated as per Appendix E: Trans Mountain Safety Precautions When Working Within two metres of Other Workers Guidance) and in instances in which workers are accessing private lands as outlined in Section 4.8 of this document.

In situations where the physical distancing requirements cannot be maintained, under the guidance of a health and safety advisor or supervisors, enhanced PPE and appropriate hygiene practices must be used to carry out the work. Workers will wear a face covering which they must be familiar in how to wear, remove and dispose of (or wash), including performing good hand hygiene before fitting the face covering and after taking it off. Below is an updated list of the specific PPE procured by Trans Mountain for use during COVID-19:

- Multi-layered cloth masks
- Disposable procedural masks
- Half mask with P100 filters
- Nitrile gloves
- Face shields
- Safety glasses
- Cartridges (P100 and defender) for half masks

Workers are trained on how to wear, remove and dispose of masks, including performing good hand hygiene before fitting the mask and after taking it off. The workforce is trained in care, use, storage, maintenance, disposal and protection of all PPE.



Trans Mountain continues to procure and provide personal protective equipment for workers. This includes basic supplies, such as hand sanitizer, as well as procedural masks, cloth non-medical face masks and half-mask respirators for use in situations where physical distancing cannot be maintained during the work assignment, and work must proceed. These measures have been implemented to support the safety and security of both the workers working on Trans Mountain sites and the communities where they work. All control measures are discussed during the daily tailgate safety meetings, job hazard assessments and documented during the Field Level Risk Assessment process.

All operations workforce have a personal supply of PPE either at their workstation or in their vehicle. This includes safety glasses, half-mask respirator, full-face respirator, face shield, extra P100 defender and particulate cartridges and a box of nitrile gloves (100). This PPE is used to adhere to all COVID-19 protocols and in the event of an emergency. Proper respirator maintenance is strictly followed including requirements to minimize unnecessary contact with the respirator surface, adherence to hand hygiene practices, proper PPE donning and doffing techniques, physical inspection checks and performing a user seal check. Respirators are to be hung in a clean area or keep in a clean, breathable container between uses.

As an early response planning action, Trans Mountain acquired additional enhanced PPE supplies and has adequate PPE in stock for the foreseeable future, based on the current and anticipated workload for the Expansion Project and for Operations.

## 4.2 CONTRACTOR MANAGEMENT

As part of the Trans Mountain Expansion Project, the Company has hired several General Construction Contractors (GCCs) and Engineering, Procurement and Construction (EPC) contractors to enable construction of the Project.

Trans Mountain requires its Contractors and sub-contractors to develop and implement an appropriate and Trans Mountain-compliant COVID-19 plan to support the health and safety of the workforce at all worksites. These Contractors' plans must meet or exceed the measures set out in Trans Mountain's own plan, follow all local government, provincial and federal guidelines, and at a minimum, include mitigative measures implemented to reduce contamination and propagation of COVID-19, response to be taken if someone is identified to be symptomatic on site (develops fever, cough, runny nose unrelated to allergies, etc.), and PPE arrangements (direction for use and preparation for escalation of use). Contractor Requirements for COVID-19 reporting were updated in November 2020.

As appropriate, updates to Trans Mountain requirements, plans, procedures, protocols, and guidelines are provided to Contractors via supply chain contract administrators, ISNetworld, email dissemination via Trans Mountain Health and Safety workers, and the external access site developed specifically for the Contractors to have access to updated Trans Mountain COVID-19 information, procedures and protocols.

Trans Mountain is also working with and inspecting smaller contractors to ensure the same information is available and that all COVID-19 prevention measures are being undertaken.



## 4.3 TRAINING

Trans Mountain provides training for Expansion Project field workers in the form of all-hands meetings which are held on an as needed basis and target all field workers, including Project management, health and safety, and environment. The TMEP Director, Health and Safety, hosts and facilitates these meetings, which provide an avenue for the following:

- Overview of revisions and updates to existing plans, protocols, procedures and guidance documents.
- Overview of new plans, protocols, procedures, and guidance documents.
- Expectations and considerations for field work.

Trans Mountain developed an online training module for COVID-19 and includes information about COVID-19 and associated best practices and guidance. It also includes specifics about hand washing practices, facial mask donning/doffing, cleaning protocols, how and where to access COVID-19 testing and available resources, mental health and stress resources, and an overview of Trans Mountain COVID-19 programs and requirements. Trans Mountain requires all office workers complete the module prior to going to any office. Trans Mountain also requires all field personnel complete the module as part of their safety training. The training module has been provided to TMEP general construction contractors as a tool to augment their current COVID-19 training program. Trans Mountain updated the online training module in January 2021 to include basic information about vaccine development and distribution and the importance of maintaining COVID-19 protocols, even after vaccination occurs.

## 4.3.1 Contractor Orientations

The Trans Mountain Contractor EHS Orientation continues to be administered. Trans Mountain verifies completion with contractors and continues to complete site specific orientations onsite at Trans Mountain locations. Verification of completion of the Trans Mountain Contractor EHS Orientation and site-specific orientations is done while maintaining appropriate physical distancing. Emphasis is placed on not sharing writing instruments or handling documentation. Electronic documentation transfer is preferred.

## 4.4 WORKFORCE EXPOSURE, SELF-ISOLATION AND CONTACT TRACING

Trans Mountain workers are required to notify their supervisor and stay home if they are sick or show ANY signs of illness. Workers are required to self-isolate if they are feeling flu-like symptoms or any of the symptoms associated with COVID-19.

When a worker reports COVID-19 symptom or has a positive diagnosis, Human Resources or the TMEP Health and Safety representative conducting oversight for the extended workforce follows up with the individual and their supervisor to begin contact tracing within the workforce.

Human Resources first identifies the individual's current work situation (home/office/field) to determine the possible exposures to other workers. Depending on their current working situation, additional questions are asked related to accommodations, interactions with other workers and which sites/offices had been visited within the previous two weeks. If there are known or suspected exposures to additional workers (close contacts), those workers are sent home to self-isolate.



Workers who are sent home to self-isolate are required to isolate until a negative test comes back on the original worker; or if the test is positive for the original worker, the additional workers will remain in self-isolation for 14 days from their last exposure to the original worker. If those workers begin to exhibit symptoms, they are required to remain in isolation for at least 10 days after the onset of symptoms and be fever free, without the use of fever-reducing medications such as Acetaminophen, Aspirin, Naproxen and Ibuprofen, for at least 24 hours before returning to work.

## 4.4.1 Possible Cases

Trans Mountain has developed two scenarios to respond to possible cases:

#### Case 1 - Symptoms and Approach – Found Before Work:

Workers are required to remain at home, call their supervisor and self-isolate if they are feeling flu-like symptoms or any of the symptoms associated with COVID-19. Workers who self-isolate or identify as having COVID-19 symptoms, but do not seek testing or are unable to obtain testing, must self-isolate for 10 days from the onset of symptoms unless the symptom is related to a pre-existing health condition (see Appendix B: Trans Mountain COVID-19 Response Plan). Worker contact medical authorities and seek a COVID-19 test, if directed to do so by medical authorities.

### Case 2 - Symptoms and Approach – If Found While Onsite:

If a worker indicates they are experiencing symptoms while at work, they are required to immediately notify their supervisor and/or their Trans Mountain site representative. At that time, the worker is required to leave the worksite and self-isolate until medical direction is received, or the 10-day self-isolation timeline is met. Workers are to seek medical direction on the need for COVID–19 testing.

When an Indigenous worker has declared symptoms, the worker is directed to self-isolate. To prevent potential spread, Trans Mountain is committed to arrange for isolation accommodations such as a hotel (however, this will not include an active Trans Mountain accommodation site such as a camp) until a COVID-19 test is performed and results are confirmed – or the isolation term is complete and medical clearance occurs. Trans Mountain will also co-ordinate the provision of food and other personal necessities while in isolation (i.e. meal delivery).

A Trans Mountain worker, who lives or resides in an Indigenous community, will be required to immediately inform an appropriate official of their community if they have been identified as presumptive by Trans Mountain, or if they have tested positive for COVID-19. The worker is also responsible to report to Trans Mountain that such communication with the community has taken place.

In addition, Trans Mountain, for its direct workforce, has developed a procedure for managing presumptive and positive cases of COVID-19. Within that procedure, a decision matrix outlines nine scenarios that will be handled in a rapid manner. It establishes roles and responsibilities of the worker and their supervisor. See appendix F for this matrix.

## 4.4.2 COVID-19 Testing and Results

#### 4.4.2.1 Positive Test

Upon a positive COVID-19 test, Trans Mountain will:

• Be immediately notified and will ensure all appropriate health authorities are informed including providing information on contact tracing.



- Ensure any other appropriate government notifications are made.
- Work with Contractors and health authorities to ensure appropriate health authorities community workers are notified of the case.
- Work with the contractor to establish and notify the workers on site (or off site) who are likely to have been exposed to the COVID-19 positive worker.

The following steps will then be taken:

- 1. Workers who are deemed to have been in close contact will be required immediately self-isolate and monitor for symptoms. The definition of close contact includes those who:
  - a. provided care for the individual, including health care workers, household members OR;
  - b. other caregivers, or who had other similar close physical contact without consistent and appropriate use of personal protective equipment OR;
  - c. lived with or otherwise had close prolonged contact (within two meters) with the person while they were infectious OR;
  - d. had direct contact with infectious bodily fluids of the person (e.g., was coughed or sneezed on) while not wearing recommended personal protective equipment.
- All workers on that worksite will be put on alert to monitor for symptoms but will be allowed to remain on site, as long as they pass daily screening requirements and remain symptom-free.
   TMEP will be conservative in its judgment and, if necessary, will close the worksite if it suspects a potential outbreak.
- 3. TMEP will communicate with communities and stakeholders as appropriate to ensure they have the facts on the situation. This will be undertaken via the respective Community Liaisons and Indigenous Field Advisors in conjunction with subject matter experts.

## 4.4.2.2 Negative Test Response

If a worker receives a negative test, they must provide confirmation that they have received a negative test from the jurisdictional health authority before returning to site. The worker must be fever free for 24 hours without the aid of symptom-relieving medications prior to returning to work.

## 4.4.3 Return to Work

All workers must be healthy to return to work. All workers and visitors are required to complete and sign a COVID-19 Self-Declaration Questionnaire prior to being granted access to any Trans Mountain facility or Project worksite.

In addition to the self-declaration questionnaire, if a worker received a positive diagnosis of COVID-19 they must be cleared by a medical professional before returning to work.

If an answer on the questionnaire changes, or a worker answers yes to any question regarding COVID-19 exposure risk, they must immediately notify their supervisor and/or Trans Mountain site representative. Trans Mountain must be notified of a return-to-work status for all workers.

## 4.4.4 COVID-19 Field Testing

Trans Mountain will continue to use public health care facilities as their main source of testing for COVID-19 where available, particularly in communities where there is significant capacity to conduct these tests. To supplement this publicly available testing and the additional safety measures already implemented, Trans Mountain has taken proactive steps and is securing the ability and technology to be



able to perform a rapid COVID-19 test in the field. Rapid testing can provide several benefits to the workforce including:

- Providing a rapid response and mass testing if a confirmed case arises at a worksite.
- Allowing Trans Mountain to isolate quickly and contain the virus spread within a worksite.
- Allowing workers with COVID-19-like symptoms to return to work quicker, as these symptoms may be a result of a common cold or flu.
- Shortening the self-isolation time.

Trans Mountain continues to monitor the Health Canada approvals of rapid testing kits and engage with providers. These include:

- Genetrack Biolabs Vo COVID-19 Molecular Test. In order to keep Trans Mountain's worksites safe for all workers, TMEP implemented a COVID-19 rapid screening protocol for all personnel returning from the break. This process commenced the week of December 14, 2020. This COVID-19 rapid screening program adds another layer of protection to current TMEP COVID-19 practices and protocols. Trans Mountain has sourced COVID-19 home collection kits from a private accredited lab, Genetrack Biolabs, to conduct rapid screening of all returning personnel. The lab is accredited by the Standards Council of Canada for forensic biology and DNA, including PCR amplification, analysis, interpretation and reporting. In respect to the collection kits, the lab has obtained FDA EUA for testing, but have not in Health Canada, simply because the service does not exist. The U.S. also has a federally regulated standard for testing labs (CLIA), which the lab also possesses, but in Canada, medical services, including those offered by physicians, hospitals, and labs, are delegated to specific provinces.
- HSE Integrated Panbio COVID -19 Ag Rapid Test. Trans Mountain has retained the services of HSE Integrated, a subsidiary of DXP Enterprises, to provide access to the Abbott Labs Panbio COVID-19 Ag Rapid Test Device and to aid in managing a testing program at field locations. Under a Pilot Project in Jasper, AB, the TMEP – HSE COV19 Testing program consists of 5,000 tests provided to TMEP by HSE who will be conducting eight tests per hour by accredited test administrators. With immediate access to an inventory of testing devices, HSE Integrated will be able to deliver a turn-key testing solution and be rapidly deployable providing testing where it is required, when it is required. Using the Health Canada approved testing device, workers at Trans Mountain locations will be able to get fast, clear results, allowing Trans Mountain to take the appropriate steps to either deflect or contain a potential outbreak at its worksites.
- Trans Mountain has also entered into an agreement with **Abbott Labs** to procure its own testing equipment and be provided appropriate training once these tests become available to general industry later in 2021. Once Trans Mountain has these tests, training current personnel and developing a more comprehensive testing protocols and guidance will proceed.
- **BD Veritor Health Canada** In March 2021, Trans Mountain entered into an agreement to participate Government of Canada's initiative to provide rapid screening kits to employers in critical industries with workers in high-contact settings. Health Canada has provided Trans Mountain with 3000 BD Veritor System for Rapid Detection of SARS-CoV-2 tests which detect



proteins from the SARS-CoV-2 virus. A nasal swab is used to collect the specimen from a patient suspected of having COVID-19. The sample is prepared, added to the assay cartridge, incubated and then interpreted by the Analyzer. It is the intent to deploy these tests to the field and use them to establish a rapid testing program at Trans Mountain's Burnaby/Westridge facility.

• **Private testing labs.** Labs in both Alberta and B.C. have been contacted and will be retained to provide on-site testing when required. Benefits of these services include rapid testing for workers who may have had contact with symptomatic confirmed COVID-19 cases to clear symptomatic and asymptomatic individuals to return to work.

Trans Mountain monitors this evolving science and continues to evaluate alternative solutions to the one identified above. Trans Mountain is currently developing a testing strategy for these devices to ensure their most effective and efficient use to maintain a safe work environment and ensure continued safe operation and construction activities.

## 4.4.5 COVID-19 Vaccination

The BC Public Health Office and WorkSafeBC have identified the highest risk categories of worksites through the COVID-19 Workplace Task Group established by the PHO in November 2020. The Public Health Authorities of Northern and Interior BC have identified that workforces for the Trans Mountain Expansion Project meet the criteria identified, specifically as large industrial camps under the PHO Industrial Camps order with congregate accommodations for workers and other large congregate living settings for workers where isolation and quarantine is difficult and outbreaks are ongoing.

Trans Mountain has been provided with doses of the COVID-19 COVISHIELD (AZ/SII) by Northern Health and Interior Health and is working with the respective health authorities to administer the vaccine to its workforce. This includes workers who are employed by GCCs and their subcontractors. Utilizing the occupational health clinic provider, 24/7 OEMS, for the administration of the clinics, Trans Mountain mobilized nursing and administrative staff for each location of Valemount (Spread 3/4A) and Clearwater (Spread 4B). The vaccine is being administered on a voluntary basis to any eligible worker who meets the criteria for the program.

## 4.5 ON-SITE CONSTRUCTION SECURITY

Trans Mountain's construction on-site security is provided through joint ventures between existing security companies and Indigenous communities, known as Security Joint Venture partners. Trans Mountain ensures that security guards have adequate PPE and cleaning and sanitizing supplies to clean vehicles and hotel rooms. The Security Team has three conference calls every week where information regarding the status of COVID-19 procedures and reporting is shared. The Security Team also has a weekly conference call with Security Joint Venture partners to discuss and provide COVID-19 status updates.

Trans Mountain's Security Liaison is notified immediately of any worker displaying potential COVID-19 symptoms. Trans Mountain's security program encompasses the following components for worker safety:

- Ensuring that the worker does not require immediate medical attention.
- Advising them to stay in their hotel until appropriate alternate arrangements can be made.



- Ensuring the isolation of the worker.
- Verifying if the worker has travelled with anyone and implementing measures to reduce or contain possibility of spread.
- Investigating all points of contact and possible contamination.

Additionally, in the case of Indigenous security workers who display symptoms, Trans Mountain requires the worker to advise their home community that one of its members has symptoms and wants to return to their community. Trans Mountain shares pertinent information including:

- Worker's current living conditions (how many people in the house).
- Concerns expressed by worker (i.e. a family member with pre-existing medical condition).
- Results of worker self-isolation and, if they have been tested for COVID-19, the results of the testing.

Regional Security Managers providing on-site construction security report directly to Trans Mountain's Indigenous Security Liaison. Trans Mountain is fully aware from which Indigenous community each of its guards are from, and where they reside on their days off (i.e., on reserve or off reserve).

Trans Mountain's Security Manager stays in contact with workers and receives regular status updates. Trans Mountain also remains in contact with the Nation to understand any concerns that have been identified in the community as a result of the worker returning to the community.

## 4.6 Additional Measures Specific to Indigenous Peoples

From the outset of the pandemic, Trans Mountain saw the critical need for specific measures to protect its Indigenous workforce and undertake measures to mitigate the spread of infection to Indigenous communities. Measures specific to this vulnerable population were developed and implemented early due in part to the fact that general information and supports may have been slow to make their way to the communities more broadly. As part of that early development and ongoing management of the pandemic's impact on Trans Mountain, the Company engaged with communities to communicate its plan, and to increase the Company's understanding of community concerns, and to discuss additional potential measures to protect its Indigenous workforce. The special Indigenous measures that are included in the COVID-19 Preparedness Plan are a result of not only that engagement, and also through engagement with others in the broader industry, health authorities, and research. The measures have evolved with the changing nature of the pandemic, community feedback and lessons learned.

Trans Mountain acknowledges and appreciates the concerns raised by Indigenous communities about their capacity to manage increased health and safety needs during this pandemic. Indigenous peoples and their communities are a priority for Trans Mountain. The Company is committed to assist with protection of, and to the extent possible, the communities from which its workers travel and reside in, while working for Trans Mountain.

Through its engagement with various provincial and federal COVID-19 planning coordination efforts, Trans Mountain is aware of several resources and supports available to Indigenous communities related to the COVID-19 pandemic. In March 2020, the federal government announced two funding tracks to support Indigenous communities in preparing for, and responding to, the COVID-19 pandemic. To build on these programs, Trans Mountain has taken the following additional measures to complement existing resources available to protect Indigenous workers and minimize potential exposure risk to Indigenous communities.

## 4.6.1 Indigenous Worker Personal Safety and Prevention Measures

The best first defense to minimize risk is prevention. The overall COVID-19 management program applies to all Project workforce, including Indigenous workers.

The Government of Canada has stated First Nation, Inuit and Métis are among the most at-risk, and face unique challenges in addressing COVID-19.

These additional measures are in place or being undertaken for protection and risk minimization in recognition of the potential for the pandemic to impact Indigenous workers and their respective communities.

- a) As a preventive indicator, a program for temperature testing for all workers on arrival, and voluntary screening upon departure from the worksite.
- b) Where an Indigenous worker has declared symptoms, the worker is required to report symptoms and as a result, may be directed by Trans Mountain to self-isolate. To prevent potential spread, Trans Mountain is committed to providing support for workers with isolation arrangements such as safe transportation and accommodations (however may not include an active Trans Mountain accommodation site, i.e., camp community) until a COVID-19 test is performed and results are confirmed – or the isolation term is complete and medical clearance occurs. Trans Mountain can assist with coordination for the provision of food and other personal necessities while in isolation (i.e., meal delivery).
- c) Where an Indigenous worker has declared or displayed symptoms or is directed for COVID-19 testing and self-isolation, and where that worker lives or resides in an Indigenous community, Trans Mountain may cover reasonable directly related expenses associated with the isolation, including meals and continued compensation subject to the individual following all isolation and COVID-19 mitigation requirements during isolation and until medical clearance is received. Other isolation related costs may be considered at Trans Mountain's discretion.
- d) Workers will not visit or otherwise travel to, or enter a First Nation or other Indigenous community, unless it is where they reside or without the expressed, written permission from the required authority of that community.

# 4.6.2 Indigenous Worker Health Monitoring, Reporting and COVID-19 Related Information Disclosure

Trans Mountain recognizes Indigenous communities have a need for information related to their membership working for the Company.

Several disclosure measures are in place, or continue to be developed as needed, to ensure Trans Mountain can provide as much information as possible regarding Indigenous worker health monitoring, while respecting employment legislation, and the need for confidentiality and personal privacy.



Disclosure-related measures or initiatives are regularly evaluated for implementation and are also assessed for verification of compliance with all applicable laws and regulations. The measures are regularly reviewed as potential special measures to address the unprecedented risks associated with operating during a pandemic. The disclosure of such information would allow Trans Mountain and Indigenous communities working on the Project to understand how many workers are travelling to and from their respective locations.

For the purposes of potential disclosure, Trans Mountain may require a worker to provide the following:

- a) Community affiliations including:
  - i. Location of accommodations where a worker resides when on-shift, if not a Trans Mountain designated accommodation.
  - ii. Where a worker resides when off-shift (during a required isolation).
- b) For the purposes of identifying the scope of isolation requirements:
  - i. Worker's home community geographical community of residence, particularly if that is the location of their primary residence.
  - ii. Number of people who reside in their primary household.
  - iii. Agreement to limit the number of people co-accommodating while on-shift.
  - iv. Reporting any exposure to known or suspected infected individuals.
- c) A Trans Mountain worker, who lives or resides in an Indigenous community, will be required to immediately inform an appropriate official of their community if they have been identified as presumptive by Trans Mountain, or if they have tested positive for COVID-19. The worker is also responsible to report to Trans Mountain that such communication with the community has taken place.

#### 4.6.3 Enhanced Indigenous Engagement Measures

Trans Mountain has dedicated resources for Indigenous communities as part of its normal course of business and its ongoing Indigenous engagement. Indigenous Relations Advisors are assigned specifically to all communities and are the "relationship owners" who have long-term, well-established relationship with communities.

In addition to ongoing engagement, enhanced measures may be implemented to address COVID-19 concerns and could include the following categories:

- a) Enhanced Communications:
  - i. Increase the use of social media where necessary to reach Indigenous communities, which could include using Indigenous media and high-use sites and tools, direct-to-community targeting, linking-in with existing community social media tools, reporting etc.
- b) Indigenous Monitoring (IM) Program:



- i. Trans Mountain's Indigenous Monitors continue to be engaged safely in their day-to-day work on the Project, and highlights of their field work and mitigation observations are made available online, in a timely manner. Other measures can include:
  - The exploration, for possible implementation, options for "virtual" monitoring, items such as use of digital devices and technologies (i.e., video platform(s) or installed cameras on a site or activity) for field work, where Indigenous communities could virtually visit sites "real-time" while Trans Mountain field environment workforce and or IMs are "on the ground."
- ii. Trans Mountain has advised its Indigenous Monitors that should they opt not to work during the pandemic due to personal safety concerns, they may do so without consequence and are welcome back to their roles when they feel safe to do so. Should this occur, Trans Mountain will explore options for IMs to potentially work virtually, with their integrated Environmental Inspection Team, to continue to provide their Indigenous knowledge.
- c) Indigenous partner community support fund:
  - i. Trans Mountain has developed a process to received and review requests for reasonable, community-based COVID-19 funding supports, from Indigenous communities that are engaged in the Project, or who work for the existing operating pipeline system. This fund provides support that is not otherwise provided by other parties (i.e., provincial or federal governments and agencies) and would enhance a partner communities' ability to continue to be involved in Trans Mountain work. Supports may include providing personal hygiene safety supplies, and home safety supports for Trans Mountain Indigenous workers and their families.

## 4.7 INDIGENOUS MONITORING PROGRAM

The Trans Mountain Expansion Project retains Indigenous Monitors (IMs) as integrated members of its Environmental Inspection team during construction. Through the IM Program, IMs work with Environmental Inspectors to monitor compliance with approved mitigation measures, particularly in relation to traditional resource use as well as cultural and heritage considerations. IMs may participate and build capacity in other environmental inspection duties and bring an Indigenous lens to environmental inspection activities.

The TMEP Indigenous Monitor Program is continuing in active construction areas where the Program is required, and Trans Mountain continues to work to ensure all commitments made will be fulfilled. Trans Mountain maintains an active roster of IMs to support ongoing construction activities.

Throughout the COVID-19 pandemic, Trans Mountain has maintained regular, direct communication with its Indigenous Monitors who are active on the monitoring roster in areas of active construction, as well as with their Indigenous group points of contact. This ongoing communication occurs at two levels:

a) At construction sites, regular communication with IMs takes place daily with at-site meetings with the Environmental Inspection Team and construction counterparts. IMs are integrated members of the Trans Mountain Environmental Inspection team on-site and are included in all



information sharing and requirements regarding TMEP protocols. For example, IMs are included in site requirements, including pre-screening self-declaration questionnaire, temperature screening, social distancing, weekly self-report dashboard tool and guidance for work in close proximity.

- b) As COVID-19 requirements are developed and implemented, active IMs receive information and briefings at-site via Trans Mountain Health and Safety Leads and their Lead Environmental Inspectors.
- c) At an administrative level, regular direct IM communication is typically regarding shift scheduling, rotations, request for additional information or support. During COVID-19 communication has evolved to include updates and questions regarding COVID-19 requirements and developments on-site, and support as required.

Trans Mountain remains flexible in working with Indigenous communities participating in the monitoring program.

### IM COVID-19 Training

As COVID-19 requirements have been developed and implemented, active IMs have received information and briefings on-site via Trans Mountain Health and Safety Leads and their Lead Environmental Inspectors. Current developments on COVID-19 are discussed at regular site meetings.

A COVID-19 response overview is now included in onboarding training of new IMs. This provides awareness of Trans Mountain's overall COVID-19 Plan, the types of site-specific measures that will be required on-site and supports available to the IMs. Overview information about Trans Mountain's COVID-19 response is also provided to Indigenous communities that are new to the IM Program during COVID-19 times as their IMs are onboarded.

IMs are included in Trans Mountain updates and ongoing information sharing related to COVID-19 developments. Trans Mountain continues to work directly with IMs related to any unique supports or questions.

## 4.8 COMMUNITY AND LANDOWNER

Ongoing operations and construction may require Trans Mountain workers access private lands. The program sets out specific direction in these situations and requires Trans Mountain workers do the following:

- Verify landowners have been notified prior to any access of their lands.
- Wear appropriate PPE which will include mask and gloves when accessing private lands and sanitize any touch points after completing the work including gates, locks and fences. PPE controls are not a replacement for physical distancing.
- Ensure landowner equipment and property are left clean and sanitized after completing work.



- Dispose of nitrile gloves properly in waste receptacles after leaving the property. When public interaction is indicated, confirm that the appropriate person is communicating and practice physical distancing.
- Use appropriate trash and recycling receptacles for waste products.
- When using community and public facilities, abide by all Trans Mountain guidelines, procedures, practices and jurisdictional requirements.
- Trans Mountain and its Contractor must establish a clear expectation for worker behaviour when off duty as it relates to COVID-19. This includes requirements when commuting to and from the worksite, lodging and while visiting any community. Workers must be diligent and prevent the spread of COVID-19 to communities in which they reside or visit. Trans Mountain's workforce must always minimize interaction with the public outside of work hours and practice physical distancing and good hygiene practices.
- Workers will not visit or otherwise travel to or enter a First Nation Reserve or other Indigenous community, unless they reside there, or they have the expressed, written permission from the authority of that community.

## 4.9 WORKER ACCOMMODATION

Trans Mountain Expansion Project's approach to worker accommodation is multi-faceted and will vary along the Project route depending on work location and activity. The plans consider a number of factors, such as accommodation capacities of local and regional communities, the size of the anticipated nonlocal construction workforce, balancing the potential for adverse socio-economic effects with the expressed desire to maximize economic opportunities in host communities, and the preferences from local and regional authorities.

Trans Mountain's objective is to balance the positive impact of economic benefits for local accommodation, retail and service providers, with the need to satisfy local concerns about increasing demand on accommodation and housing.

Those working on the Project in the vicinity of the Valemount, Clearwater and the Ohamil Camp (also known as Sqemel Lalem) Camps are required to stay in the camp. In communities with no TMEP camps, Project workers, including employees, contractors and subcontractors, are required to stay in accommodation in adherence with provincial and federal Public Health COVID-19 orders and guidelines.

All persons who enter the respective Valemount, Clearwater and Ohamil (Sqemel Lalem) Camp communities are temperature tested at the security gate in order to gain entry to the site and then again on exit; this can occur multiple times a day if a person goes in and out. The COVID-19 procedures and protocols described in this report apply to all Trans Mountain and Contractor workers regardless of where they reside.

Trans Mountain's Valemount Camp commenced occupancy on July 6, 2020, the Clearwater Camp commenced operation on October 10, 2020, and the Ohamil Camp commenced operation on November 30, 2020.

Trans Mountain continues to operate its three Camps with its contracted operators and continues planning for operations of its one additional camp community, is working with regulatory and health authorities and aligning with developing best practices to address the COVID-19 situation.

Trans Mountain has engaged the services of a third-party qualified medical consultant to assist with COVID-19 planning and response for all construction activities, non-camp accommodations and camp operations.

TMEP requires its contractors to determine how many are in which towns, in what hotels, and document the cleaning and inspection protocols within the hotels, including the food services. Through its contractors, TMEP also requires and inspects how the workforce is cleaning its equipment and clothing. The workforce is currently being transported and is working as per the Trans Mountain and TMEP Response Plan requirements.

Both B.C. and Alberta have issued specific Provincial Health Officer Orders, requirements and guidance for camp operation. Trans Mountain considers these requirements to be a minimum standard for compliance. Trans Mountain has developed a "Trans Mountain Camp and Accommodations COVID-19 Guideline" (Appendix G). It has been developed in conjunction with the existing Trans Mountain COVID-19 Plan requirements, the recommendations of its medical consultant, health and safety professionals.

## 4.9.1 Indigenous Accommodation Measures

Trans Mountain's engages with Indigenous groups regarding its temporary workforce and the Worker Accommodation Strategy associated with construction activities. In addition to engagement activities with individual groups, Trans Mountain launched a *Circle for Indigenous Involvement* (the Circle) to better understand Indigenous perspectives and involve Indigenous people in the development of solutions that could address the unique interests of Indigenous peoples working on the Project, and staying in Trans Mountain accommodations, such as camp communities.

The Circle first met in February 2020 to identify strengths and gaps in the strategy, along with measures to close the gaps. Some early opportunities identified include the retention of a liaison role dedicated as an interface between a camp and local Indigenous community, as well as the development of an Indigenous communication strategy on temporary workforce and worker accommodation.

Members of the Circle have had an opportunity to participate in a virtual tour of ATCO's existing camp community in Fort St. John and a Circle meeting was held at the Clearwater Camp community in October of 2020, allowing Circle members to experience an operating camp community under COVID-19 conditions.

The intent of the Circle is to meet regularly, for continued idea generation, as a means to make the Project accommodations meaningful for Indigenous workers, and to have a positive influence and connection with the Indigenous communities impacted by the presence of a temporary workforce.

## 4.9.2 Contact Information

The majority of the TMEP workforce is hired by Trans Mountain's EPC/GCCs. Due to COVID-19, and in compliance with all privacy laws, Trans Mountain through its contractors will be recording where members of its workforce are living during their time on the Project and for six weeks after workers leave the Project. Public health officials will rely heavily on this information for their monitoring and for any contact tracing investigation, should that become necessary.

To facilitate public health follow-up with symptomatic individuals and those exposed, TMEP/Contractors will maintain a running list of all workforce and visitors on each worksite. Visitors include anyone coming

on site such as delivery persons, repair persons, etc. This inventory list must be maintained for at least six weeks and must contain:

- Full name and contact information (telephone number, email and physical address) of the individual.
- Name and contact information (telephone number, email and physical address) of the individual's employer.

## 4.10 COMMUNICATIONS

As part of the pandemic protocols, Trans Mountain has a communication process to evaluate and determine the types and extent of communication with its workforce, the Contractors, Indigenous communities, stakeholders and the general public, if COVID-19 is presumed or confirmed within the workforce.

As with many aspects of the COVID-19 protocols, the situations under which Trans Mountain may need to communicate vary greatly depending on the individual's exposure, who they have come in contact with, the environment where they work and live, and who employs them.

### 4.10.1 Internal Communications

Trans Mountain continues to provide accurate, consistent and regular communication to its direct workforce.

This need was recognized early as one of the critical responsibilities of the CIST. In addition to continuing to provide COVID-19 updates, there was, and continues to be a need to ensure the workforce remains calm, safe and productive during the pandemic.

The following workforce communication channels and tactics have been implemented to date:

- a) Dedicated COVID-19 resource page on the Company's intranet.
  - COVID-19 resource page was established on January 31, 2020 and has been the main source of information for the workforce; including updates, news, health and safety measures, other important resources.
- b) Dedicated internal email channel to answer questions.
- c) Monthly President and CEO All-Hands Meetings.
  - o 30-minute update by President and CEO with Q&As from workforce.
  - Follow-up survey and/or trailer calls to 10 people, post-meeting, to ask what is working and not working.
- d) Monday morning President and CEO blog post to all workforce.
- e) Additional intranet resources to support those who were/are working from home/alternate office locations including a dedicated wellness page.
- f) Regular Workforce Leader teleconferences and specific Leader messages via email.



- 30-minute conversations with Directors, Managers and Supervisors to discuss mental wellness, remote working challenges and provide an exchange of ideas and solutions.
- g) Masks were made available on the internal company e-store for purchase; these are in addition to masks that were distributed to all workforce in May 2020.
- h) The TMEP COVID-19 Contractor External Site continues to be updated with information for the Project's contractors on COVID-19 protocols and procedures, including updates and changes.
   Previous versions of materials are not removed from this site; they are filed in a separate folder marked superseded.

### 4.10.2 External Communications

Trans Mountain's channels for communicating with its external audiences, taking into consideration how widely the information should be shared and the speed at which the information should be shared, are:

- direct communication via email, phone calls and / or virtual meetings and presentations
- printed materials for landowners, neighbours and stakeholders.
- owned channels
  - transmountain.com
  - Social channels Twitter and Facebook
  - news media

#### Trans Mountain Website

Trans Mountain has a dedicated webpage containing information on its COVID-19 response (<u>transmountain.com/COVID19</u>). This allows for frequent and regular updates that are required to respond to the rapidly changing nature of the pandemic.

The content of this webpage was updated on January 29, 2021 to reflect the current status of Trans Mountain's response and relevant content from the Report on Preparedness, Planning and Response. A graphic was added to the page on February 27, 2021 that shows a graph of confirmed positive cases in Trans Mountain's extended workforce by month since March 2020. This graphic is being updated during the first week of each month to include the confirmed positive cases from the previous month, it was last updated on March 3, 2021.

Trans Mountain's initial statement regarding COVID-19 was posted on March 17, 2020. Web traffic from the posting dates through to March 24, 2021 is summarized below in Table 5. There has been no new Trans Mountain social media or editorial content relating to COVID-19 during this period.

Website Activity				
Trans Mountain Web Page	Details	Page Views (Cumulative)		



Website Activity				
Trans Mountain Web Page	Details	Page Views (Cumulative)		
COVID-19 Landing Page	transmountain.com/covid19	10,431		
	<u>COVID-19: Maintaining the Health and Safety of</u> <u>our Workforce, their Families and our</u> <u>Communities</u> – Published March 17, 2020	1,664		
	Update: COVID-19 Protocols – Published March 21, 2020	2,753		
COVID-19 Updates	Update: Operations in Light of the COVID-19 Pandemic – Published March 30, 2020	2,579		
	Photos: COVID-19 Measures on the Trans Mountain Expansion Project – Published April 30, 2020	1,330		
	<u>Photos: Trans Mountain Operations COVID-19</u> <u>Measures</u> – Published May 14, 2020	1,393		
COVID-19 Mention	Recap: Burnaby Telephone Town Hall	469		
	Landing Page	2,595		
Temporary Workforce	Valemount Camp Community	2,163		
Accommodation	Clearwater Camp Community	603		
	Ohamil Camp Community	1,188		
COVID-19 Report	COVID-19 Report	January Report 324 Cumulative Views for All reports 1,778		

Table 1: External Website Activity

Social Media and E-Newsletters



Important COVID-19 updates are also promoted through the Trans Mountain social media platforms as well as through automated construction update emails and e-newsletters sent to subscribers. Social media activity, construction update emails and e-newsletter distribution between March 19, 2020 and March 24, 2021 is summarized in Table 6. There have been no new social media posts specific to COVID-19 since May 22, 2020. A link to Trans Mountain's COVID-19 webpage was shared in Trans Mountain Today on February 4, 2021, highlighting the posting of Version 7.0 of the Report on Trans Mountain's COVID-19 Preparedness, Planning & Response.

Social Media Activity					
Platform	Communication Details				
Twitter (11,115 current followers)	<ul> <li>Seven COVID-19 specific posts</li> <li>Four Project Update posts sharing COVID-19 messaging</li> </ul>				
Facebook (13,276 current followers)	<ul> <li>Six COVID-19 specific posts</li> <li>Four Project Update posts sharing COVID-19 messaging</li> </ul>				
LinkedIn (55,100 current followers)	<ul> <li>Six COVID-19 specific posts</li> <li>Four Project Update posts sharing COVID-19 messaging</li> </ul>				
Trans Mountain Today (13,455 current subscribers)	<ul> <li>Newsletter with links to COVID-19 web content</li> <li>12 e-newsletters have contained links</li> </ul>				

Table 2: Social Media Activity

#### <u>Media</u>

Trans Mountain received 43 media requests between January 29, 2021 and March 24, 2021. During this period, the B.C. Provincial Health Order for Industrial Project Restart approved a planned workforce restart for Trans Mountain region affecting Trans Mountain's Valemount Camp Community and a 55-km section of the Expansion Project creating some media attention. BC's public health officials also determined the province's initial shipment of AZ/SII vaccine (AstraZeneca) will be used to protect workers in industries where full use of personal protective equipment and barriers can be challenging, outbreaks and clusters have occurred or are ongoing, and workers must live or work in congregate settings. Of those media requests, four were specific to the B.C. Provincial Health Order and the vaccine announcement. The primary form of response has been by email and phone.

#### **Notifications**

Trans Mountain is required to notify potentially affected parties of upcoming construction work. In addition to details about construction activities, Trans Mountain has added the following language to the notifications sent to Indigenous communities and stakeholders. The language was first included in a Trans Mountain construction notification or background document on March 23, 2020.

Trans Mountain's first priority will always be the health and safety of our workforce, their families and our communities. In response to the evolving COVID-19 pandemic, Trans Mountain and our construction contractors for the Trans Mountain Expansion Project have been working diligently together to ensure adherence to all advice and direction from government and health officials both provincially and federally.

For more information on Trans Mountain's COVID-19 response, please visit <u>transmountain.com/covid19.</u>

This content has been included in all construction notifications or background notices issued since March 23, 2020 till present. COVID-19 messaging will continue to be updated and included in future notifications or background notices as appropriate.



## 5 APPENDICES

- A COVID-19 Response Timeline
- B Trans Mountain COVID-19 Response Plan
- C Trans Mountain COVID-19 Self Declaration Questionnaire and Guidance
- D Trans Mountain Site Access Temperature Screening Protocol
- E Trans Mountain Safety Precautions When Working within 2 m of Other Workers
- F Trans Mountain Rapid Response Decision Matrix
- G Trans Mountain Camp and Accommodations COVID-19 Guideline