

## **Gender and Cultural Safety Plan Woodfibre LNG Project**

**May 13, 2024**

## Revision Control

<b>1</b>	January 27, 2024	Issued for review	Selena Basi	
<b>2</b>	February 4, 2024	Issued for review	Selena Basi	Updated to reflect Woodfibre LNG internal reviews and discussions with the Gender Safety Advisory Committee
<b>3</b>	February 5, 2024	Issued for consultation	Selena Basi	Updated to reflect Woodfibre LNG internal reviews and discussions with other stakeholders
<b>4</b>	February 16, 2024	Issued for EAO review	Selena Basi	Updated to reflect feedback from Indigenous Groups, Gender Safety Advisory Committee members and other stakeholders
<b>5</b>	April 15, 2024	Issued for EAO review	Selena Basi	Updated to reflect feedback from District of Squamish, Squamish Nation and B.C. Environmental Assessment Office
<b>6</b>	April 30, 2024	Issued for EAO review	Selena Basi	Updated to address feedback from B.C. Environmental Assessment Office
<b>7</b>	May 7, 2024	Issued for EAO review	Selena Basi	Updated to address feedback from B.C. Environmental Assessment Office
<b>8</b>	May 13, 2024	Issued for EAO review	Selena Basi	Updated to address feedback from B.C. Environmental Assessment Office

## Executive Summary

Gender and cultural-based violence are legitimate, far-reaching and serious issues that need to be prevented and addressed through collaborative efforts of industry, government, communities and society. Efforts are underway across the Province of British Columbia to aid survivors and disrupt cycles of violence. Significant provincial resources are being allocated to achieve this objective, including expanding secure, short-term housing and assistance for women and their children escaping violence. Additionally, funding is being provided to enhance access to sexual assault services, including the establishment of new support centres and crisis lines. This work importantly highlights the importance of having Environmental Assessments consider the impacts of gender-based violence in the context of major industrial projects, as was done for Woodfibre LNG in the process of seeking approval for the use of a floating workcamp accommodation (a “Floatel”). This management plan is the first of its kind that provides mitigations and actions based on a regulatory requirement – rather than a general expectation of the workplace and of society – to address gender and cultural safety.

Woodfibre LNG General Partner Inc., through Woodfibre Management Ltd. (“Woodfibre LNG”) is taking deliberate and immediate steps to deter and prevent gender and cultural-based violence on its worksite, onboard the worker accommodation (Floatel) and within the communities proximate to where the Project is located. Through current and planned partnerships with local community organizations and Indigenous Groups, Woodfibre LNG has pledged to deter gender or cultural-based violence where our people live and work. By investing in programs and services that expand workers’ understanding of harassment and violence, through to funding programs that aim to prevent and deter any forms of violence, Woodfibre LNG is taking necessary steps in what we know to be a journey of reconciliation with the Skwxwú7mesh Úxwumixw (Squamish Nation), the səilwətał (Tsleil-Waututh) Nation and other Indigenous nations.

The *National Inquiry into Missing and Murdered Indigenous Women and Girls* was foundational to exposing the almost incomprehensible harm and loss related to thousands of missing women and girls and the process involved in prioritizing the safety of Indigenous women and their recognition as important, valued and equal to all other members of our society. Prior to the regulatory requirement being in place, the National Inquiry and Calls for Justice led Woodfibre LNG to work towards ensuring that as the Company builds and operates an LNG facility, every effort will be put into actioning recommendations from the Inquiry, while listening to Indigenous partners and taking real steps to prevent any forms of harassment, discrimination or violence. Woodfibre LNG recognizes and has reviewed the Province of British Columbia’s recent strategy, *Safe and Supported: B.C.’s Gender-Based Violence Action Plan*, and shares mutual objectives related to gender and cultural safety. Woodfibre LNG will advance these objectives through actions such as:

- Programs to deter and prevent violence;
- Anti-discrimination practices;
- Gender and cultural safety training; and
- Support for mental health, substance use disorders, addictions and sexual health for our workforce.

Woodfibre LNG’s Gender and Cultural Safety Plan is a living commitment to stakeholders and community

partners to demonstrate that any forms of harassment, discrimination or violence based on gender or cultural background will not be tolerated, while the Project is being constructed through into operations. Finally, the Gender and Cultural Safety Plan serves as a dynamic framework for coordinating and driving the Project's objectives and actions for promoting gender and cultural inclusion. This Plan emphasizes continuous learning and improvement and rigorous monitoring to ensure that everyone who works on the Project receives the necessary respect, support and services they require.

Woodfibre LNG acknowledges that its Project operates within the traditional, ancestral and unceded territory of the Skwxwú7mesh Úxwumixw (Squamish Nation) and the səlilwətał (Tsleil-Waututh) Nation, and appreciates the partnership with and contributions of local Indigenous and community partners who have engaged on the development of this Plan. Woodfibre LNG takes strength and determination from these groups and would like to acknowledge that without their support and input, the development of this Plan would not have been possible. It is the hope that it serves as a roadmap of best practice across the province, and beyond, for similar industrial projects.

*Woodfibre LNG's Gender and Cultural Safety Plan is predicated on tangible actions and mitigations related to two core concepts: (i) to prevent and deter gender and cultural-based violence; and (ii) to respond to any incidents or reports of violence, should they occur. Through the strategies and actions summarized in the below table, Woodfibre LNG is developing and implementing a robust management system framework for addressing violence in the workplace, and in communities, that is intended to advance a positive, collaborative path forward for industry, Indigenous Groups, communities, service providers and advocacy groups to work together in accordance with emerging regulatory requirements.*

## Summary of Actions and Mitigations: Woodfibre LNG Gender and Cultural Safety Plan

<i>Preventing and Deterring</i> <b>Gender and Cultural-Based Violence</b>	<i>Responding to</i> <b>Gender and Cultural-Based Violence</b>
<ul style="list-style-type: none"> <li>• Establish, communicate and enforce a <b>Worker Code of Conduct</b>, which includes consequences for non-compliance.</li> <li>• Develop, implement and communicate a <b>Bullying, Harassment and Discrimination Policy</b> that provides a shared understand among workers of what constitutes bullying, harassment and discrimination and how it can be prevented.</li> <li>• Develop and articulate <b>standards for behaviour</b> to prevent disrespectful behaviour at work and in the community and <b>behaviour indicators</b> that can verify early incidents of harassment and violence.</li> <li>• Offer mandatory <b>bullying and harassment training</b> to all workers and leaders that cover topics such as how to recognize and report incidents and how to foster a workplace culture that promotes respect and inclusion.</li> <li>• Offer comprehensive <b>mental health programming</b>, including <b>addictions awareness training</b>, focused on education and awareness (e.g., prevalence, symptoms, available treatments) and prevention and early intervention (e.g., resilience-building, early identification).</li> <li>• Offer mandatory <b>violence and harassment prevention training</b> to equip workers to recognize and manage incidents of harassment, including sexual harassment, with a specific program designed for management and leadership. Additionally, trainings will include being able to recognize and understand when workers / managers themselves are harassing others.</li> <li>• Encourage and <b>reinforce positive worker behaviour</b> and a <b>philosophy of raising awareness</b> of bullying, harassment, violence, and discrimination.</li> <li>• Continue to offer and expand <b>gender safety programming</b> with the goal of ensuring gender and cultural inclusivity and discouraging individual and bystander behaviour related to gender-based violence.</li> <li>• Provide mandatory <b>gender and cultural safety training</b> that covers lessons on privilege and discrimination and risks for Indigenous women and girls.</li> </ul>	<ul style="list-style-type: none"> <li>• Offer a range of <b>confidential reporting mechanisms</b>, including a confidential reporting line, for workers and community members to report complaints, allegations, and concerns, including those related to gender and cultural-based violence.</li> <li>• Offer comprehensive mental health programming that includes <b>counselling, support services, and addictions support</b> for workers who may experience violence, harassment, addictions, substance use, or other mental health issues.</li> <li>• Offer <b>sexual health services</b> and referrals to workers.</li> <li>• Provide <b>enhanced capacity to the local women's centre</b> and to PearlSpace, to support women and girls who report experiences of gender-based violence.</li> <li>• Develop and implement a confidential <b>Worker Feedback Program</b> that allows workers to submit feedback on Floatel experience, services and amenities including gender and cultural experiences and mental health supports.</li> <li>• Develop and implement a <b>Floatel and Workplace Culture Committee</b> that includes the Floatel Indigenous Cultural Manager and that has a mandate to monitor worker experience on the Floatel.</li> <li>• Ensure recommendations inform <b>adaptive management</b> and are reflected in updates to the Plan and ongoing programming.</li> <li>• <b>Monitor and report</b> on the effectiveness of the mitigations included in the Plan and adjust where needed.</li> </ul>

## Skwxwú7mesh Úxwumixw (Squamish Nation) Preamble

The Woodfibre Liquefied Natural Gas Project is a liquefied natural gas export facility being constructed on the former Woodfibre Pulp and Paper Mill site in Nexwnéwu7ts Átlk'a7tsem (Howe Sound), approximately seven kilometres south of Skwxwú7mesh (Squamish). The Project is on the historical location of a Skwxwú7mesh Úxwumixw (Squamish Nation) village known as Swiyát. Swiyát and Nexwnéwu7ts Átlk'a7tsem (Howe Sound) are tied to the cultural well-being of Skwxwú7mesh Úxwumixw (Squamish Nation) members, their ancestors, and their descendants, and to other Indigenous Groups as defined in the Project's Environmental Assessment Certificates.

Woodfibre LNG recognizes the importance of these areas to the Skwxwú7mesh Stélmexw (Squamish People), and other Indigenous Groups. While Woodfibre LNG seeks to construct and operate the Project in a manner that is respectful of Indigenous values, this Gender and Cultural Safety Plan is primarily written in English.

Temíxwiyíkw chet wa naantem chet ti temíxw Swiyát Chet wa sménhemswit kwis ns7éyxnitás chet ti  
temíxw We7ú chet kwis t'íchimwit iy íwas chet ek' I tti

Our ancient ancestors named this place Swiyát  
We, as their descendants safeguard these lands  
We will continue to swim and fish in these clear waters.

## Table of Contents

Executive Summary.....	3
Skwxwú7mesh Úxwumixw (Squamish Nation) Preamble .....	6
1. Introduction .....	14
1.1 Overview .....	14
1.2 The Importance of Gender and Cultural Safety .....	16
1.3 About the Gender and Cultural Safety Plan.....	17
1.4 Connection to Woodfibre LNG’s Management System .....	18
1.5 Acknowledgement .....	18
1.6 Context.....	19
1.6.1 Regulatory Context .....	19
1.6.2 The Floatel .....	19
1.6.3 Socioeconomic Context: Gender Based Violence .....	20
1.6.4 Why Woodfibre LNG Developed Gender Safety Programming .....	21
1.6.5 Legislation, Regulations and Guidelines .....	22
1.7 Corporate Commitments .....	22
1.8 Roles and Responsibilities.....	23
1.9 Engagement During Development.....	25
1.9.1 Overview .....	25
1.9.2 What We Heard .....	26
2. About the Project.....	30
2.1 Project Phases.....	31
2.2 Anticipated Project Workforce.....	32
2.3 Considerations for FortisBC Eagle Mountain – Woodfibre Gas Pipeline Project.....	33
3. Gender and Cultural Safety Plan Overview.....	34
3.1 Objectives .....	34
3.2 Documentation .....	35
3.3 Updates to the GCSP .....	35
4. Gender and Cultural Safety Plan: Policies, Programs and Initiatives .....	36

4.1 Worker Code of Conduct and Bullying, Harassment and Discrimination Policy.....	37
4.1.1 Worker Code of Conduct Overview .....	37
4.1.2 Bullying, Harassment and Discrimination Policy Overview .....	38
4.1.3 Procedures and Consequences for Non-Compliance .....	40
4.1.4 Protecting Against Retaliation.....	41
4.1.5 Standards for Behaviour and Behaviour Indicators .....	42
4.2 Bullying and Harassment Prevention Training .....	44
4.3 Worker Feedback Program .....	45
4.4 Reporting Mechanisms .....	47
4.5 Gender Safety Advisory Committee.....	48
4.5.1 Receiving Reports and Actioning Recommendations .....	49
4.5.2 Membership.....	50
4.6 Gender Safety Programming.....	50
4.7 Worker Health and Wellness .....	53
4.7.1 Medical Professionals .....	54
4.7.2 Mental Health Programming .....	54
4.7.3 Addiction Awareness .....	56
4.8 Gender and Cultural Safety Training .....	57
4.9 Violence and Harassment Prevention Program .....	58
4.10 Reporting and Compliance: Medical and Mental Health .....	61
5. Floatel and Workplace Culture Committee .....	63
6. Monitoring, Reporting, Compliance and Adaptive Management .....	65
6.1 Monitoring .....	65
6.2 Compliance Assessment .....	65
6.3 Non-Compliance, Corrective and Preventative Actions.....	66
6.3.1 Non-Compliance .....	66
6.3.2 Corrective and Preventative Action .....	66
6.4 Indigenous Groups Follow Up Monitoring.....	66
6.5 Reporting .....	67

6.6 Adaptive Management and Continuous Improvement .....	68
7. Qualified Person(s) .....	70
8. Appendices .....	71

## Abbreviations

2SLGBTQIA+	Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer and/or Questioning, Intersex, Asexual, and plus
B.C.	British Columbia
CSIMP	Community Services and Infrastructure Management Plan
DoS	District of Squamish
EA	Environmental Assessment
EAC	Environmental Assessment Certificate
EAO	BC Environmental Assessment Office
FDS	Federal Decision Statement
GCSP	Gender and Cultural Safety Plan
LNG	Liquefied Natural Gas
IAAC	Impact Assessment Agency of Canada
SNEAA	Squamish Nation Environmental Assessment Agreement
The Plan	Gender and Cultural Safety Plan
TWN	Tsleil-Waututh Nation
the Project	Woodfibre LNG Project
VCH	Vancouver Coastal Health
Woodfibre LNG	Woodfibre LNG General Partner Inc.

## Glossary

<b>Adaptive Management</b>	An iterative approach by which the effectiveness of mitigation measures is evaluated based on monitoring results, and adjusted if required, to achieve desired objectives. It generally includes problem assessment, planning, implementation of management actions, monitoring, evaluation, with the cycle repeating until the identified uncertainties are sufficiently reduced.
<b>Application</b>	The environmental assessment application filed by Woodfibre LNG with the BC Environmental Assessment Office.
<b>Bullying</b>	Willful, aggressive behaviour with negative intent that causes physical, physiological or emotional harm.
<b>Community</b>	People residing in the District of Squamish.
<b>Cultural Safety</b>	Process of making spaces, services and organizations safer and more equitable for Indigenous peoples.
<b>Discrimination</b>	Negative treatment that is based on a personal characteristic that is protected by the Human Rights Code, such as race, colour, religious belief, gender, mental or physical ability, or sexual orientation.
<b>Emergency</b>	A situation that calls for immediate and targeted action because it has resulted in or may result in an undue risk to the health and safety of Project personnel or the public; significant damage to property or equipment; significant damage to public property or equipment; and damage to or from the environment.
<b>Emergency Services</b>	Emergency response services include fire protection, police, ambulance, emergency evacuation by boat, medi-vacuation by helicopter, hospital emergency services, emergency social services and search and rescue.
<b>Floatel</b>	The marine-based work camp, associated facilities and mooring infrastructure dedicated to housing approximately 650 workers during the Construction and Operations of the Project.
<b>Gender</b>	Constitutes gender identity and gender expression. Gender identity is a person's sense of their gender,

	<p>including whether they identify as cisgender or transgender man, woman, Two Spirit, non-binary or otherwise.</p> <p>Gender expression is about how a person presents their gender. It includes how a person acts and appears. It can include dress, hair, make-up, body language, and voice.</p>
<b>Gender-Based Violence</b>	Violence experienced by people because of their gender, gender expression, gender identity or perceived gender.
<b>Gender Safety</b>	Process of making spaces, services and organizations safer and more equitable regardless of gender, gender expression, gender identity or perceived gender.
<b>Harassment</b>	Unwelcome, aggressive and/or abusive behaviour that any reasonable person knows or reasonably ought to have known would be humiliating or intimidating.
<b>Indigenous Groups</b>	Skwxwú7mesh Úxwumixw (Squamish Nation) and Tsleil-Waututh Nation.
<b>Local and Regional</b>	Squamish and Squamish-Lillooet Regional District area.
<b>Management</b>	A person who represents the management or leadership level of Woodfibre LNG or one of its contractors or subcontractors.
<b>Metrics</b>	A method of measuring something or the results obtained from measuring something.
<b>National Inquiry into Missing and Murdered Indigenous Women and Girls</b>	A national inquiry conducted by the federal government in 2016, with a resulting report of recommendations issued in 2019, because of the fact that thousands of Indigenous women and girls have disappeared over many generations throughout Canada, without proper follow up, investigation or recourse.
<b>Qualified Person</b>	A person who has the training, experience and expertise in a discipline relevant to the field of practice set out in the condition.
<b>Socioeconomic Effects</b>	The economic, social, and financial effect of an activity on a community or Indigenous Group.
<b>Stakeholders</b>	People, organizations, or groups who are not an Indigenous group, and who may directly or indirectly be affected by the Project, or who may have interests in the Project and/or the ability to influence its outcome.

<b>Two-Spirit</b>	A term used and highly regarded within some Indigenous communities, referring to a cultural, spiritual, sexual or gender identity that is both masculine and feminine.
<b>Violence</b>	Behaviour involving physical force intended to hurt, damage or kill someone or something.
<b>Worker</b>	Any person employed by the Holder of the Certificate (Woodfibre LNG), associated contractor or subcontractor, working at the Project or being housed in accommodations provided for the purpose of the Project's Construction and Operation.
<b>Workforce Accommodation</b>	Housing for the Project construction personnel. Could include a temporary workforce accommodation (i.e., the Floatel), rental housing or other temporary accommodation options as determined through the engagement and consultation process, and as approved by regulatory agencies.
<b>Workplace</b>	Any physical location owned and operated by the Holder of the Certificate (Woodfibre LNG) where workers are on-duty.
<b>Worksite</b>	The Woodfibre site as identified by the Certified Project Area of the Environmental Assessment Certificate.
<b>2SLGBTQIA+</b>	Acronym for Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer and/or Questioning, Intersex, Asexual, and the plus reflects the countless affirmative ways in which people choose to self-identify.

# 1. Introduction

## 1.1 Overview

Woodfibre LNG is committed to avoiding wherever possible adverse social, environmental, health, heritage and economic effects associated with the construction and operation of its planned liquefied natural gas (LNG) processing, marine storage, and off-loading facilities (the Project). This includes addressing the potential for gender and cultural-based violence and harassment, including towards Indigenous women, girls and 2SLGBTQIA+ peoples, both as part of the workforce and in the community.

This Gender and Cultural Safety Plan (“GCSP” or “the Plan”) has been developed with the objectives of preventing and deterring gender and cultural-based violence and harassment that could be experienced by the Woodfibre LNG workforce and community members within or near to the District of Squamish. The Plan describes actions and initiatives relevant to the Project’s

- industrial workcamp (people living on the Floatel and working on-site),
- the limited number of project management workforce living in the community at the leased, Sirocco 1 building,
- the Woodfibre LNG’s corporate office (employees), and
- the community at-large.

Development of the GCSP involved extensive discussions with Indigenous Groups and stakeholders both prior to the B.C. Environment Assessment Office (EAO) requirements, as well as during the development of this Plan (See Section 1.9 - Engagement During Development). These groups also helped inform the many initiatives that Woodfibre LNG developed prior to the GCSP requirement but that are key elements of the GCSP (e.g., gender safety programming). The GCSP fulfills all requirements of Condition 26 of the B.C. EAO’s approval to amend the Project’s Environmental Assessment Certificate (#15-02), which requires Woodfibre LNG “to develop a gender and cultural safety plan which would apply to all Workers of the Project.” It also addresses several related requirements captured in Conditions 27 and 28.

This Gender and Cultural Safety Plan (“GCSP”) has been developed to meet the Environmental Assessment Certificate Condition 26: “The Plan must be developed in consultation with Indigenous Groups and other stakeholders identified in 26.3(g)”<sup>1</sup>. Because Conditions 27 and 28 include measures that are also important to addressing gender and cultural safety, aspects of those requirements are also included in this Plan.

The Plan reflects Woodfibre LNG’s plan to deter, prevent and manage potential impacts related to gender and cultural-based violence on the Woodfibre LNG Project including the workforce accommodation. Woodfibre LNG and its contractors are committed to maximizing positive benefits, including worker health and wellness, limiting potential negative community impacts from work camps, and offering services and programs to support community members and workers. The safety of the Squamish Nation, the

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<sup>1</sup> Amendment #3, Environmental Assessment Certificate #E15-02, Woodfibre LNG Project. 1 November 2023.

community of Squamish and our workforce during construction is a key value for the Project. In an effort to accommodate concerns and capitalize on opportunities raised by members of the community, Indigenous Groups and others, Woodfibre LNG has made progressive changes to the Project throughout the planning phase.

To Woodfibre LNG's knowledge, the Project is the first industrial project in Canada required to develop and implement a targeted GCSP for its workcamp, recognizing that FortisBC must also develop a GCSP for its Eagle Mountain Pipeline workcamp. This is a new requirement from the provincial government, arising from national inquiries and calls for action to government for all new regulated and approved projects that involve industrial workcamps.

This Plan represents new domain as a regulated management plan and is intended to create a standard for other industrial projects. This Plan will continue to evolve and be updated as gender and cultural safety considerations integrate more fully into Project planning and implementation. Further, this Plan is a legal requirement and subject to compliance and enforcement oversight by the BC Environmental Assessment Office. This is a step forward to advance calls to action from governments, advocacy groups and Indigenous communities, and also provides clear and actionable steps for Woodfibre LNG and its contractors to maintain compliance with the new regulatory requirements.

Working together on the issue of gender and cultural safety, the following changes were made by regulators and by the Company:

- The use of a floating hotel ("Floatel") rather than a land-based camp or other alternative for accommodation of the Project's non-local construction workforce, to avoid pressures on housing and community services in Squamish.
- Use of ferry and shuttle services to transport workers to the site.
- A decision to not provide access to the Squamish community for Floatel residents, except in the case of an emergency that requires health care services not provided on site, or for specific business requirements.
- A commitment to work with and engage community service groups, Indigenous Groups and other stakeholders as part of an adaptive management framework as it relates to receiving feedback and making changes over the life of the Project.
- The decision to make gender and cultural safety training a mandatory requirement, to be received in person, prior to the issuance of site access passes for the construction workforce.

The GCSP is predicated on two core concepts to support gender and cultural safety:

***Preventing and deterring gender and cultural-based violence:*** Many of the initiatives that make up the GCSP, such as the available health supports and education, awareness and training initiatives, are intended to serve as proactive measures to prevent and deter gender and cultural-based violence and reinforce positive worker conduct, on the Floatel and in the community.

***Mitigating potential effects by responding to reports of gender and cultural-based violence:*** The GCSP outlines procedures for reporting incidents and unacceptable behaviour, rooted in the Worker Code of Conduct and supporting policies, consequences management and support services for workers who

experience violence or mental health issues.

This Plan describes how the Woodfibre LNG Project will go about implementing various systems and processes to mitigate, deter and manage gender and cultural safety for the Project.

## 1.2 The Importance of Gender and Cultural Safety

Gender and cultural safety in the workplace includes creating and maintaining an environment where individuals feel respected, valued, and included regardless of their gender identity or expression, or their cultural background. This involves implementing policies, systems, programs, and attitudes that actively prevent discrimination, bias, and harassment based on gender or cultural factors and fostering an atmosphere where individuals are free to authentically express their gender identity and cultural diversity.

To promote gender and cultural safety, Woodfibre LNG is conducting various education and awareness initiatives around gender and culture, especially as it relates to the deterrence of violence and harassment. This includes providing training on topics such as unconscious bias, cultural sensitivity, and respectful communication. These are fully described in this Plan, under sections 4.2, 4.7, 4.8 and 4.9. Additionally, Woodfibre LNG is establishing clear protocols for addressing instances of discrimination or harassment based on gender or culture and create channels for employees to report such incidents safely and confidentially. By prioritizing gender and cultural safety, Woodfibre LNG can create a more inclusive and supportive workplace culture where all employees can thrive and contribute their unique perspectives and talents while ensuring our commitments of mitigating gender and cultural violence in the broader community.

Gender and cultural safety in the workplace are crucial for fostering an inclusive and equitable environment that promotes the well-being and productivity of all employees. The initiatives that make up this Plan are intended to demonstrate to the workforce and the community, that discrimination, harassment and violence based on gender identity or expression will not be tolerated by Woodfibre LNG. This philosophy not only ensures fair treatment regardless of gender, but also allows individuals to bring their authentic selves to work.

Cultural safety is equally important to the Woodfibre LNG Project as it acknowledges and respects the diverse backgrounds and traditions of all workers. By creating a culturally safe workplace, Woodfibre LNG is demonstrating a commitment to understanding and valuing the unique perspectives that individuals from various cultural backgrounds bring to the table. This not only promotes a sense of belonging and inclusion but also enhances creativity and innovation within teams.

Woodfibre LNG has broadened what “safety” means on a construction project and within worker accommodation. For the Woodfibre LNG project, gender and culturally based violence, such as harassment, slurs, lewd comments and bullying are given paramouncy alongside responsibilities for safe work and the physical safety of the workforce.

Overall, both gender and cultural safety will contribute to a positive workplace culture that fosters collaboration, creativity, and individual growth and works to prevent and deter gender and cultural-based

violence which are a key goals and objectives of Woodfibre LNG and its partners as it constructs the LNG facility and begins operations.

### 1.3 About the Gender and Cultural Safety Plan

The Woodfibre LNG Gender and Cultural Safety Plan will achieve several key objectives that contribute to creating a more inclusive and respectful workplace environment that is free from violence. Firstly, the GCSP will establish clear policies and procedures to deter and address discrimination, bias, harassment and violence based on gender identity and cultural background. By outlining expectations for behaviour and providing guidelines for handling incidents of discrimination, harassment and violence, the Plan strives to ensure that all employees understand their rights and responsibilities regarding gender and cultural safety. This proactive approach not only promotes a sense of security among workers but also demonstrates Woodfibre LNG's commitment to fostering an environment where everyone is treated with dignity and respect.

Secondly, the Woodfibre LNG GCSP prioritizes education and awareness initiatives to promote understanding and empathy among workers. This includes providing bullying, harassment and violence prevention training on topics such as unconscious bias, cultural sensitivity, and respectful communication to equip employees with the knowledge and skills necessary to create an inclusive workplace culture.

*To date, there have been **1000+ Woodfibre LNG workers and suppliers trained**, in-person, on cultural and gender safety. Through this training, workers get the privilege of learning directly from Indigenous trainers about the culture, values and beliefs of the Skwxwú7mesh Úxwumixw (Squamish Nation). Workers learn about the history of the Squamish Nation, their governance approach, the impact of residential schools and cultural genocide, the ongoing crisis related to Missing and Murdered Indigenous Women and Girls and archaeology considerations including chance find procedures. Testimonies from workers about the training include:*

*"Very informative"*

*"Been on several projects over Canada, this was the best Indigenous training I have experienced"*

*"Thank you for sharing your story"*

*"Extremely powerful"*

By raising awareness of the diverse experiences and perspectives of individuals from different genders and cultural backgrounds, the GCSP encourages empathy and mutual respect among colleagues, fostering a more harmonious and collaborative work environment.

Lastly, the GCSP will focus on accountability and continuous improvement by implementing mechanisms for monitoring and evaluating progress towards achieving gender and cultural safety goals. This may involve collecting data on incidents of discrimination or harassment, conducting regular surveys or

assessments to measure worker perceptions of safety and inclusivity, and soliciting feedback from workers, stakeholders, Indigenous Groups and others on the effectiveness of existing policies and programs. By regularly evaluating the company's performance in terms of gender and cultural safety, and taking action to address any areas of concern, the GCSP ensures that efforts to promote inclusivity and prevent and deter violence, remain responsive and adaptive to the evolving needs of workers and the community. Ultimately, Woodfibre LNG's GCSP aims to create a workplace where all individuals feel valued, respected, and empowered to contribute their unique talents and perspectives to the organization's success.

The Plan has been developed in accordance with the conditions of the Environmental Assessment Certificate (EAC) and is structured to make it clear how the conditions have been met or exceeded.

## 1.4 Connection to Woodfibre LNG's Management System

This document is part of Woodfibre LNG's overarching management program designed to meet the conditions and commitments required by the Project's Indigenous, municipal, provincial, and federal approvals and agreements. The Gender and Cultural Safety Plan builds on high level commitments and mitigations outlined in the Community Services and Infrastructure Management Plan, submitted to and approved by the BC EAO and the Squamish Nation in 2023. The intent of this Plan is to provide clear expectations of behaviour of all Woodfibre LNG personnel, including staff, contractors, sub-contractors and visitors, including as it relates to gender and cultural safety.

## 1.5 Acknowledgement

The GCSP was developed by Woodfibre LNG during the early works-construction phase of the Project in 2024 and was delivered by a team of technical and non-technical staff and contractors, under the direction of a Qualified Person (QP), who provide a range of perspectives and expertise to this plan.

To our knowledge, members of our team:

- Identify as cis gender.
- Identify as heterosexual or as 2SLGBTQIA+.
- Are of various ethnicities.
- Live above the poverty line and earn a living wage.
- Live in British Columbia.
- Have received at least some post-secondary education.

To address any gaps in our perspectives, the team has engaged other parties as part of the engagement and review process for this management Plan, including Indigenous Groups, community service organizations, members of the local community and government representatives.

## 1.6 Context

### 1.6.1 Regulatory Context

On October 16, 2015, Woodfibre LNG received an Environmental Assessment Certificate (EAC, #E15-02) from the British Columbia Environmental Assessment Office (EAO), which included 25 conditions. Three EAC amendments have been issued for the Project, in 2017, 2019 and 2023. The most recent amendment includes the approval of the “Floatel” as the workforce accommodation model and related conditions (see **Appendix 1** for a table of concordance, summarizing how conditions have been met by this Plan). The approval includes a requirement to develop and submit for approval to the EAO a Gender and Cultural Safety Plan (Condition 26). Woodfibre LNG also received a Federal Decision Statement (FDS) issued under Section 54 of the Canadian Environmental Assessment Act, 2012 (CEAA 2012) in 2016.

In addition, the EAC and the FDS, the Skwxwú7mesh Úxwumixw (Squamish Nation) conducted an independent environmental assessment of the Project and issued an environmental certificate in 2015, the Squamish Nation Environmental Assessment Agreement (SNEAA), which includes 25 conditions for Woodfibre LNG, Fortis BC, and the Province of BC. Thirteen of those conditions apply specifically to Woodfibre LNG. Skwxwú7mesh Úxwumixw (Squamish Nation) also reviewed the proposed use of the Floatel and issued an amendment to the SNEAA, similar to the provincial EAC amendment. A federal amendment to the FDS was not required.

Woodfibre LNG and FortisBC’s Eagle Mountain Project are the first industrial projects in B.C. and Canada to be subject to new regulatory requirements for a GCSP.

### 1.6.2 The Floatel

In response to community feedback about the need to mitigate pressure on local housing and community services in the Squamish area, Woodfibre LNG evaluated several options including a Floatel and a land-based worker camp, choosing the Floatel as the best option. In addition to providing accommodations for the non-local workforce to mitigate potential adverse impacts on local infrastructure and community services, Woodfibre LNG is committed to ensuring that all workers, whether local or non-local, work in a positive, culturally safe workplace, whether it is on the Floatel, or on the Project site generally.

The Floatel will feature:

- Individual bedrooms with locking doors and attached private bathrooms<sup>2</sup>;
- Construction offices;
- Full onboard dining;
- Confidential medical services, including access to mental health services;
- Safe and accessible drinking water supply;
- 24/7 security;
- Internet/Wi-Fi;
- Recreational and common areas;
- Recycling and waste facilities; and

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<sup>2</sup> There are accessible bedrooms for those with mobility limitations.

- Laundry services.

Locally engaged workers and contractors in Squamish and the Sea to Sky corridor will commute to and from the Woodfibre LNG site daily by ferry from a muster point in Squamish. Non-local workers will be transported directly to the Floatel from the Vancouver area and will remain at site for their 14-day work rotation before being transported back to Vancouver. Access to Woodfibre LNG's site will be controlled at all departure locations and workers residing on the Floatel would not routinely access the community of Squamish.

The Floatel is a dry facility (i.e., free of alcohol and drugs) and Woodfibre LNG will enforce drug and alcohol policies regarding substance use applicable to all Project personnel.

### 1.6.3 Socioeconomic Context: Gender Based Violence

Gender-based violence is defined as violence that is experienced as result of “gender, gender expression, gender identity or perceived gender”<sup>3</sup>. In Canada, certain groups are more likely to experience gender-based violence including:

- Women;
- Young women and girls;
- Indigenous women and girls;
- Two Spirit and Lesbian, Gay, Bisexual, Transgender, Queer, Questioning, Intersex, and Asexual Plus (2SLGBTQIA+) people<sup>4</sup>;
- New migrants to British Columbia and to Canada;
- Visible minorities;
- Women and girls living in Northern, rural, and remote communities; and
- Women and girls living with disabilities.

While Woodfibre LNG recognizes that violence and harassment can happen to anyone, including cis men, people who identify with two or more of the groups listed above may be subject to increased risk of experience related to gender-based violence. Gender-based violence can manifest in many forms, including physical and emotional, and includes behaviours such as “name-calling, hitting, pushing, blocking, stalking/criminal harassment, rape, sexual assault, control and manipulation.”<sup>5</sup>

Woodfibre LNG recognizes that incidents of gender-based violence and sexual assault are on the rise in Canada<sup>6</sup> and that police-reported incidents represent only a fraction of actual occurrences<sup>7</sup>. Woodfibre LNG also acknowledges that Indigenous peoples, particularly women and girls, disproportionately experience incidents of abuse and harassment.

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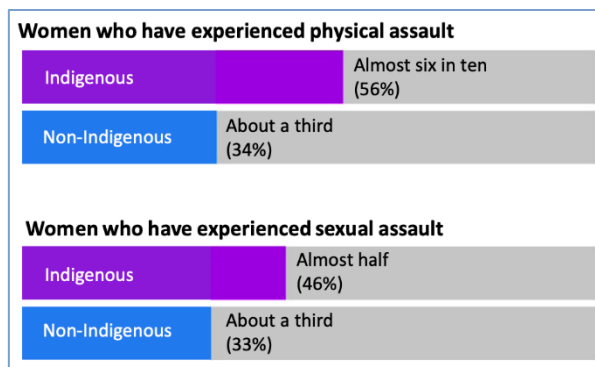
<sup>3</sup> <https://women-gender-equality.canada.ca/en/gender-based-violence/about-gender-based-violence.html#what>

<sup>4</sup> For the purpose of this report, the B.C. Government acronym is used: 2LGBTQIA+

<sup>5</sup> <https://canadianwomen.org/the-facts/gender-based-violence/>

<sup>6</sup> In 2021, there were 34,242 reported sexual assaults in Canada, an 18% increase since 2020 and the highest rate recorded since 1996.

<sup>7</sup> In 2021, only 6% of sexual assault incidents experienced by Canadians aged 15 and older in the previous 12 months were brought to the attention of police.



Source: Statistics Canada, April 2022<sup>8</sup>

### 1.6.4 Why Woodfibre LNG Developed Gender Safety Programming

Gender-based violence is a harmful and urgent issue not only from a human rights and safety perspective, but also because it inhibits the ability of women and 2SLGBTQIA+ peoples to foster economic independence and participate in the workforce<sup>9</sup>. The Woodfibre LNG Project will not be a workplace that allows violence to be experienced by anyone and the Project will support workers through the initiatives described throughout this Plan.

Woodfibre LNG is mindful of concerns that some community groups have raised about the potential impacts of industrial work camps have on women, girls and 2SLGBTQIA+ peoples. These impacts have been highlighted by The Firelight Group's publication – namely *"Indigenous Communities and Industrial Camps: Promoting Healthy Communities in Settings of Industrial Change"* (February 2017)<sup>10</sup> -- and the 2019 Calls for Justice of the National Inquiry into Missing and Murdered Indigenous Women and Girls (MMIWG) and the 2022 federal Standing Committee on the Status of Women Report, *"Responding to the Calls for Justice: Addressing Violence Against Indigenous Women and Girls in the context of Resource Development Projects"*<sup>11</sup>. While gender and cultural safety programming was well underway, Woodfibre LNG welcomed the announcement of the Province's gender-based violence action plan in December 2023, that emphasized the need for industrial projects to develop gender and cultural safety plans, as reflected by the EAC amendment issued in November 2023.

Finally, Woodfibre LNG heard feedback from key stakeholder groups during its consultations as part of the Community Services and Infrastructure Management Plan, including during community roundtable sessions held in September 2022 and May 2023, and ongoing discussions with Squamish Nation during the development of conditions related to the Squamish Nation Environmental Assessment Agreement.

Woodfibre LNG and its partners are working with the Skwxwú7mesh Úxwumixw (Squamish Nation) and

<sup>8</sup> Violent victimization and perceptions of safety: Experiences of First Nations, Métis and Inuit women in Canada: <https://www150.statcan.gc.ca/n1/pub/85-002-x/2022001/article/00004-eng.htm>

<sup>9</sup> <https://canadianwomen.org/the-facts/gender-based-violence/#:~:text=It%20can%20take%20physical%20and,between%20people%20in%20romantic%20relationships.>

<sup>10</sup> <https://firelight.ca/>

<sup>11</sup> <https://publications.gc.ca/site/eng/9.918478/publication.html>

community organizations within Squamish and other partner organizations to develop and implement meaningful actions through this Plan and our ongoing gender safety initiatives in response to the National Inquiry into MMIWG. These actions are described as part of this Gender and Cultural Safety Plan and are mapped against the National Inquiry into MMIWG recommendations, outlined in **Appendix 2**.

Woodfibre LNG takes a dual approach to addressing and deterring gender-based violence. This dual approach includes:

- **Prevention:** offering education and awareness through training initiatives, fostering a culture of speaking up rather than being a bystander, and developing policies to deter gender-based violence that stem from relevant legislation.
- **Response:** creating procedures for reporting complaints and incidents, ensuring support is available to victims who experience violence or mental health issues in and outside of the workplace, and by implementing a Worker Feedback Program and Floatel and Workplace Culture Committee (more below on these initiatives) to improve worker experience, including gender and culture experience.

Similarly, this plan and Woodfibre LNG's mitigation and action strategies are intended to support and promote the safety of women, girls and 2SLGBTQIA+ people within Woodfibre LNG work areas, and in community. Prevention and Response are applicable to both scenarios.

### 1.6.5 Legislation, Regulations and Guidelines

The following are relevant to the Gender and Cultural Safety Plan:

#### **Federal Legislation and Regulations:**

- Canadian Charter of Rights and Freedom
- United Nations Declaration on the Rights of Indigenous Peoples Act, 2021

#### **Provincial Legislation and Regulations:**

- B.C. Human Rights Code Amendment Act, 2018
- Declaration on the Rights of Indigenous Peoples Act, 2019
- Workers Compensation Act, Occupational Health and Safety Regulation
- Workers Compensation Amendment Act, 2001

## 1.7 Corporate Commitments

Woodfibre LNG prioritizes the safety and security of its entire workforce, and this extends beyond physical security to include emotional, cultural and gender safety. This also means ensuring respect for all people employed on the Project, no matter their gender, race, sexual identification or spiritual/cultural beliefs.

Woodfibre LNG's commitments to safety and to minimizing adverse impacts on local people, including women, Indigenous peoples, and communities, are outlined in the company's Community Services and Infrastructure Management Plan (CSIMP)<sup>12</sup>. The CSIMP is the foundational plan for how the Project will

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<sup>12</sup> <https://woodfibrelng.ca/wp-content/uploads/2023/11/Community-Services-and-Infrastructure-Management-Plan.pdf>

measure, monitor, manage and improve socioeconomic effects related to:

- Quality of Life and Sustainable Development;
- Housing and Accommodations;
- Municipal Utilities and Waste Management;
- Education and Recreational Services;
- Health Services and Wellbeing;
- Policing and Security;
- Land Transportation;
- Marine Transportation; and
- Emergency Services.

The CSIMP also identifies actions for maximizing local benefits of the Project, such as employment and procurement opportunities, positive environmental impacts and net zero initiatives, social investment opportunities, transparent information-sharing and meaningful consultation with community members.

This Gender and Cultural Safety Plan is intended to complement the commitments made in the CSIMP and achieve the objectives identified by the EAO, namely to:

- Deter and address harassment and violence;
- Deter gender-based violence on the Project and in the District of Squamish and Squamish community area by workers; and
- Establish clear reporting and response protocols and to address any reports or allegations of gender-based violence and harassment, and to ensure reports are made known to the Gender Safety Advisory Committee and other stakeholders.

## 1.8 Roles and Responsibilities

While Woodfibre LNG is the Project owner, there are several contractors, stakeholders and others who are impacted by and have a role to play in the implementation of the Gender and Cultural Safety Plan. Woodfibre LNG's contractors and subcontractors are contractually required to implement mitigations identified by regulated environmental and socioeconomic management plans, including this Plan. Woodfibre LNG will conduct ongoing information sessions with McDermott, sub-contractors and the Floatel operator to ensure that policies, procedures, programs, trainings and all other mitigations are understood and followed, and are regularly reviewed and discussed.

Key roles and responsibilities of the parties involved in the development and implementation of the Plan are outlined in the table below.

**Table 1: Party Roles and Responsibilities**

Party	Key Responsibilities
Woodfibre LNG	<ul style="list-style-type: none"> <li>• Develop, oversee and manage actions and mitigations identified in the Gender and Cultural Safety Plan, including procedures for non-compliance with the Worker Code of Conduct and relevant policies</li> <li>• Collaborate with stakeholders and Indigenous Groups to implement actions and ensure compliance (including by contractors and subcontractors)</li> <li>• Report progress to external stakeholders and Indigenous Groups</li> </ul>
Contractors and subcontractors, including the Floatel operator	<ul style="list-style-type: none"> <li>• Ensure compliance with actions and mitigations identified in the Plan, by all workers employed on the Project</li> <li>• Track and report incidents and infractions to Woodfibre LNG, and the result (including removal of personnel from site)</li> <li>• Support collection of data and reporting as required, including signing off on the Worker Code of Conduct, and on enrolment and completion of training by workers</li> <li>• Maintain and provide records to Woodfibre LNG</li> </ul>
Gender Safety Advisory Committee (includes Indigenous Groups, FortisBC, and District of Squamish and Squamish organizations)	<ul style="list-style-type: none"> <li>• Review and provide input on Gender and Cultural Safety Plan</li> <li>• Participate in and support actions identified in the Plan</li> <li>• Receive, review and provide input on regular reports from Woodfibre LNG and support monitoring and continuous improvement activities where needed</li> </ul>
Indigenous Groups	<ul style="list-style-type: none"> <li>• Review and provide input on the Plan</li> <li>• Participate in and support actions identified in the Plan</li> <li>• Receive, review and provide input on regular reports from Woodfibre LNG and support monitoring and continuous improvement activities where needed</li> </ul>
BC Environmental Assessment Office	<ul style="list-style-type: none"> <li>• Review, provide input on and approve the Plan</li> <li>• Receive, review and provide input on regular reports from Woodfibre LNG</li> <li>• Ensure compliance with the conditions identified by the EAC and undertake compliance management activities in the case of non-compliance</li> </ul>
Community service and justice organizations	<ul style="list-style-type: none"> <li>• Review and provide input on the Plan</li> <li>• Collaborate with Woodfibre LNG on the implementation of programming as required</li> </ul>

## 1.9 Engagement During Development

### 1.9.1 Overview

Condition 26.1 states that “the plan must be developed in consultation with Indigenous Groups and other stakeholders identified in 26.3 (g).” Condition 26.3(g) states that Woodfibre LNG must outline how it “will facilitate consultation with community partners, including the formation of a Gender Safety Advisory Committee, that includes Indigenous Groups, DOS, FortisBC and other Squamish area justice service organizations, regarding gender and cultural safety and the implementation of the Gender and Cultural Safety Plan.” The EAC also requires Woodfibre LNG to identify how stakeholder feedback will be actioned and incorporated into training and other initiatives to protect gender and cultural safety.

Similar to the CSIMP, Woodfibre LNG’s objectives for engaging stakeholders, Indigenous Groups, and others in developing the GCSP are to:

- Strengthen relationship building and promote awareness and understanding of the Project and its potential impacts among Indigenous Groups, local communities and stakeholders;
- Address community concerns and minimize potential adverse effects on the community and surrounding region;
- Maximize opportunities for Indigenous Groups and local residents, such as training opportunities; and
- Build confidence and goodwill in Squamish.

Concerns related to gender and cultural safety have been raised by community members and acknowledged by Woodfibre LNG from the early stages of Project planning. This includes during open houses, stakeholder engagement sessions, municipal delegations and community roundtables and through other means such as the Technical Advisory Committee that was established by the EAO in 2019 – comprised of Indigenous Groups, the District of Squamish and others – in order to provide iterative feedback on what would become EAC Amendment #3. The importance of gender and cultural safety was also emphasized as a key issue during development of Woodfibre LNG’s Community Services and Infrastructure Management Plan. As such, indirect engagement and consultation on the GCSP dates back numerous years.

Woodfibre LNG took a more targeted approach to engagement on the GCSP than the approach taken with some of the broader environmental and socioeconomic management plans, such as the CSIMP – which is in place to prevent potential impacts on broad service providers in the community, from housing to education. Stakeholders and Indigenous Groups who had raised gender-based violence as an area of concern during earlier management plan engagements were engaged and provided input on the content that informed the development of the GCSP, alongside others required by the EAC conditions.

In addition, the Gender Safety Advisory Committee, which was established by the Company prior to the approval of EAC Amendment #3, is the fundamental group with whom Woodfibre LNG engages and consults regarding issues and programming related to gender and cultural safety. The Committee is

comprised of representatives from Indigenous Groups, the District of Squamish, FortisBC and community service organizations, as is required by the Amendment. Details about the Gender Safety Advisory Committee are described in Section 4.5.

### 1.9.2 What We Heard

Woodfibre LNG appreciates the feedback received while developing the GCSP and has worked to address comments raised to date by the Gender Safety Advisory Committee and others. The table below summarizes the groups with whom Woodfibre LNG directly engaged on the GCSP, and key findings of the engagements. ***This table will be updated as Woodfibre LNG receives and responds to feedback from Indigenous Groups and stakeholders.*** A complete record of engagement – includes groups engaged, dates engaged, and method used to engage – is included as **Appendix 3**.

**Table 2: Key Findings of Engagements and Consultations on the GCSP**

Stakeholder/ Group	Engagement Method	Key Findings to Date
Gender Safety Advisory Committee	Committee meetings; email correspondence	<ul style="list-style-type: none"> <li>• Importance of ensuring information about gender and cultural safety is visible on the Floatel</li> <li>• Importance of there being an advocate available to workers who have been victims of harassment or violence</li> <li>• Importance of women being represented on the receiving end of complaints / incidents reporting from workers</li> <li>• Concept of a women's caucus to encourage collective reporting and support for one another</li> <li>• Importance of women having other women working on their shift</li> <li>• Importance of having consistent work-mates to build relationships and mutual support.</li> </ul>
Skwxwú7mesh Úxwumixw (Squamish Nation) <sup>13</sup>	Environmental working group or sub-working group; email correspondence	<ul style="list-style-type: none"> <li>• Skwxwú7mesh Úxwumixw (Squamish Nation) is supportive of the work that aims to prevent, deter and respond to gender safety, and has representatives who participate in the Gender Safety Advisory Committee</li> <li>• Gender and cultural violence linkages with industrial construction projects were raised as concerns</li> </ul>

<sup>13</sup> This includes (1) Engagement through Squamish Nation governmental departments: specifically, designates of the Rights and Title Department participating in SNEAA implementation in a bilateral Environmental Working Group; and (2) Views expressed from individual Squamish Nation members participating in public consultation directly, or through participation in community dialogue. Contributions from individual Squamish Nation members participating in the Gender and Safety Advisory Committee are excluded.

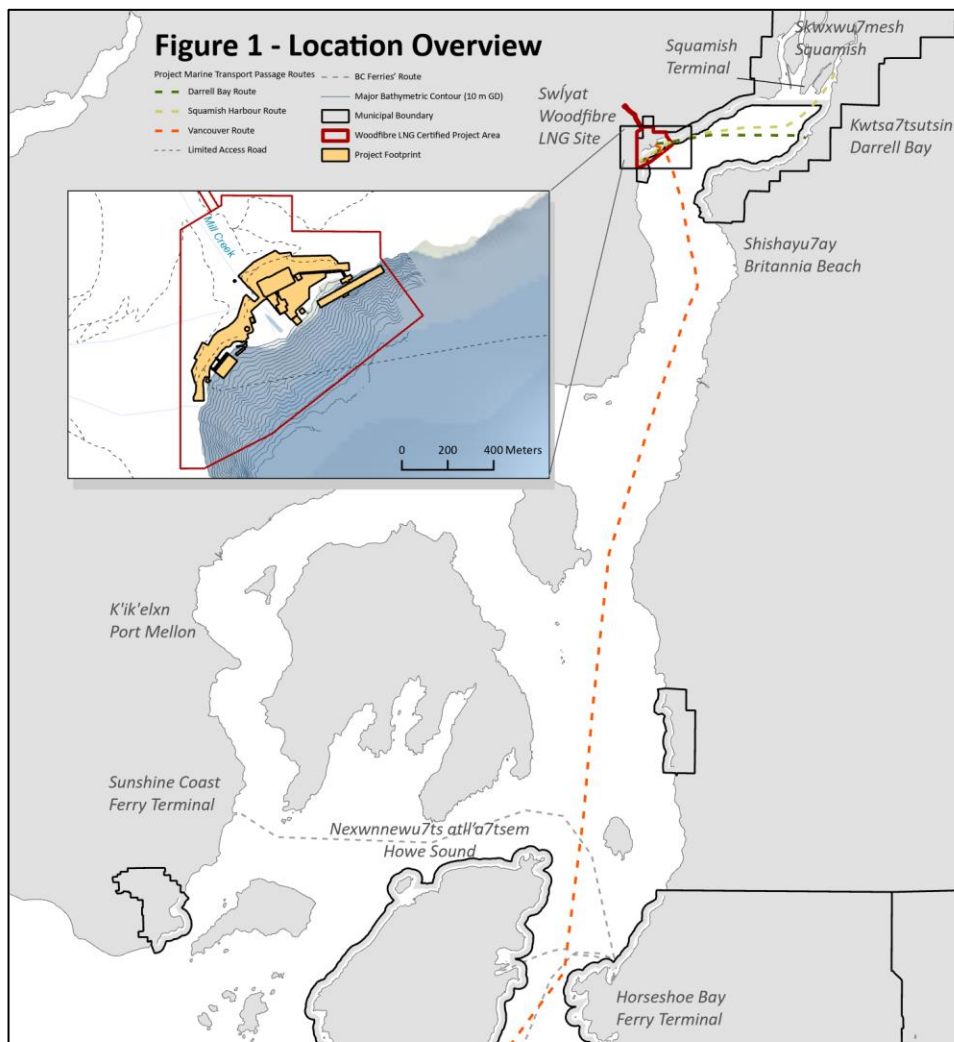
Stakeholder/ Group	Engagement Method	Key Findings to Date
		<p>throughout Floatel engagement. Emphasis was often on missing and murdered Indigenous women and girls (both the inquiry and the final report). The scope of this plan, and actions taken by Woodfibre LNG prior to this Plan, reflect in part the concerns heard from Squamish Nation members and staff. Squamish Nation regulatory approval for the Floatel was based, in part, on parallel collaboration with EAO on the scoping criteria for this plan.</p> <ul style="list-style-type: none"> <li>• Woodfibre LNG held, over a period of several months beginning in May 2023, in depth conversations with Squamish Nation environmental working group members and contractors, on the topics that developed the basis for this plan and the mitigations identified within it. This included the development of information sheets to accompany the Community Services and Infrastructure Management Plan, as well as the Squamish Nation Environmental Assessment Amending Agreement and the Environmental Assessment Amendment #3 related to the floatel.</li> <li>• Consultation with the Squamish Nation (formal and community-level) on the implementation details of this Plan are ongoing.</li> </ul>
Tsleil-Waututh Nation (TWN) Consultation and Accommodation	Technical working group; email correspondence	<ul style="list-style-type: none"> <li>• TWN is supportive of the work that is occurring around gender safety, and has representatives who participate in the Gender Safety Advisory Committee</li> <li>• TWN elder Carleen Thomas participated in the Committee meeting on September 26, 2023 and raised questions regarding the implementation process of the Plan.</li> <li>• In addition, the referrals analyst has reviewed the plan.</li> </ul>

Stakeholder/ Group	Engagement Method	Key Findings to Date
PearlSpace (previously Howe Sound Women's Centre)	Meeting with the Executive Director; email correspondence	<ul style="list-style-type: none"> <li>PearlSpace was a key voice during CSIMP consultations in 2022 and 2023, raising gender safety both on the Floatel and in the community as significant concerns. Woodfibre LNG has engaged with PearlSpace through participation as part of the Sea to Sky Sexual Assault Committee, through the Executive Director who participates as a member of the Woodfibre LNG Gender Safety Advisory Committee as well as through ongoing dialogue.</li> <li>PearlSpace has voiced support for the gender and cultural safety management plan, as it incorporates many of the recommendations that had been provided from this organization over the past sixteen months of engagement on this topic.</li> </ul>
FortisBC	Senior management coordination meetings	<ul style="list-style-type: none"> <li>Senior management from both projects have worked together extensively on issues related to gender and cultural safety, and regularly share information regarding plans, policies and programs through management meetings.</li> </ul>
District of Squamish	Meetings; email correspondence	<ul style="list-style-type: none"> <li>The use of a Floatel was a decision taken in direct response to the concerns raised by the District of Squamish related to community safety and community impact.</li> <li>An invitation for Councillor Jenna Stoner to participate on the Gender Safety Advisory Committee was extended by Woodfibre LNG in May 2023. In August 2023, the Mayor of Squamish advised that a different councillor would be representing (Lauren Greenlaw).</li> <li>Councillor Lauren Greenlaw has been participating in the Committee since the development of the Plan began, and was engaged in a discussion on this management plan on January 30, 2024.</li> <li>In addition, staff reviewed the plan and posed questions regarding party responsibilities, training, and the confidential reporting line which have been clarified by Woodfibre LNG.</li> </ul>

Stakeholder/ Group	Engagement Method	Key Findings to Date
RCMP	Meetings with senior staff; email correspondence	<ul style="list-style-type: none"> <li>RCMP officer has reviewed the Plan and posed questions about when incidents of harassment or violence would be reported to the police.</li> </ul>
Vancouver Coastal Health (VCH)	Meetings with regional staff; email correspondence	<ul style="list-style-type: none"> <li>During initial discussions, VCH raised concerns about referrals for workers to community health services, including medical health services, and the capacity of the health authority to support workers through publicly funded services. Woodfibre LNG has indicated that it will commit to on-site/contracted services before turning to publicly funded services delivered by VCH or other health authorities.</li> <li>Staff reviewed the Plan and shared appreciation for the inclusion of mental health and addictions awareness services and training.</li> </ul>

## 2. About the Project

The Woodfibre LNG project is a proposed liquefied natural gas (LNG) project located on the former Woodfibre Pulp Mill site approximately seven kilometres (km) southwest of Sk̓wxwú7mesh (Squamish), British Columbia (Figure 1). The Project will have capacity to liquefy up to 2.1 million tonnes per year of natural gas, have a storage capacity of 250,000 cubic metres (m<sup>3</sup>), and export the LNG via vessels through Howe Sound to overseas markets.



The Project is on land that for countless generations was known as Swíyát, a Sk̓wxwú7mesh Úxwumixw (Squamish Nation) village. The area became known as Woodfibre with the construction of a pulp and paper mill in the 20th century. It is still widely known as Swíyát within Sk̓wxwú7mesh Úxwumixw (Squamish Nation), and increasingly also within the non-Indigenous local community.

There is no road access to the site and all personnel, equipment, and supplies for the Project will be brought in by vessel via Nexwnéwu7ts Átlk'a7tsem (Howe Sound).

The Project components are detailed in the Certified Project Description (Schedule A, Environmental Assessment Certificate 15-2 as amended on July 12, 2019).

The key components of the Project include, but are not limited to, the following:

1. Land-based natural gas processing and liquefaction facility.
2. Connection and interaction with Fortis's Eagle Smánit (Mountain) Gas Pipeline (EGP Project).
3. Condensate storage.
4. Floating storage tanks and offloading unit and associated jetty.
5. The proposed floating accommodations (i.e., the Floatel) at site to house the variable numbers of workers during construction.
6. Supporting buildings, including administration building(s), control room(s), maintenance building(s), dry storage and chemical building(s), fire house(s), first aid building(s), flare stack, and safety and guardhouse buildings.
7. Facilities to provide site access, including floats, roll on-roll off (RO-RO), docks, temporary barge access, passenger ferry terminal, and helipad.
8. Electrical facilities to interconnect with the BC Hydro grid.

## 2.1 Project Phases

Woodfibre LNG has an Engineering, Procurement, Fabrication, and Construction (EPFC) contract with McDermott, who is designing and constructing the LNG facility. Woodfibre LNG, as the Project owner, will oversee the work performed by McDermott, in addition to its own responsibilities.

The following table outlines the various phases of the Woodfibre LNG project and associated dates:

**Table 3: Project Phases**

Phase	Description	Anticipated Dates
Pre-Construction	<p>In advance of the construction of the Project by McDermott, Woodfibre LNG directly led activities to support the rehabilitation and remediation of the site to prepare for start of construction.</p> <p>This phase focused on isolated activities, including the removal of remaining concrete, demolition of legacy infrastructure, and rail from the former Woodfibre pulp mill, and the replacement of infrastructure, such as the pre-existing passenger dock.</p>	2022-2023
Construction	<p>McDermott will lead the construction of the Project, including:</p> <ul style="list-style-type: none"> <li>• LNG facility construction and module installation</li> <li>• On-site construction support structures and equipment</li> <li>• Connection with BC Hydro power and the EGP Project</li> <li>• Implement, where relevant to their scope, mitigations of the CSIMP, the GCSP, and other project Plans, and provide reports to Woodfibre LNG on the monitoring data.</li> </ul> <p>During this phase, Woodfibre LNG will continue to lead communication and engagement with Indigenous Groups, local community and Project stakeholders. Woodfibre LNG and McDermott will be responsible for permitting and for</p>	2023-2027

Phase	Description	Anticipated Dates
	implementing, monitoring, and reporting out on the GCSP. McDermott will have a specific lead who will provide reports to Woodfibre LNG's lead.  The initiatives described in the GCSP will be implemented at the time the Floatel is occupied.	
Commissioning & Early Operations	Following completion of construction, Woodfibre LNG and McDermott will undertake completion activities to finalize construction and prepare the LNG facility for operation. Woodfibre LNG will lead communication and engagement with Indigenous Groups, stakeholders and the local community into and through Operations.	2027

## 2.2 Anticipated Project Workforce

The Project requires a temporary workforce to construct the LNG facility, to provide site services or supporting work to facilitate construction, and permanent employees to provide ongoing operations. Woodfibre LNG commits to source personnel and services locally (as defined in Section 3.1), where viable.

Woodfibre LNG and its contractors are working together to determine the number of worker and types of jobs required during the construction phase. The number of workers on site will vary throughout the Project depending on the construction activities occurring. The table below represents the workforce (direct jobs), known as of January 2024, during the different phases of the Project:

**Table 4: Estimated Workforce Per Phase**

Phase	Description
Pre-Construction	During the Project's Pre-Construction phase, an estimated 55-60 workers were required. Due to the scope of this phase, only a small portion of this workforce were required on site at any one time.
Construction	During the Construction phase, the Project employs 125-150 at the start (early 2024) and will ramp up to approximately 800 workers at peak construction (approximately one-third offsite at any given time due to shift rotations), ranging from skilled trades employed by contractors and sub-contractors to senior site managers employed by Woodfibre LNG. In addition, the Project will require contractors to provide ancillary services (e.g., janitorial, medical, transportation, equipment rental, site security and health and social services).
Commissioning	In the final year of construction, the number of workers will decrease to approximately 200 workers.
Operation	During the operations phase the project will provide approximately 100 long-term, operations jobs for up to 40 years based on our export licence. These include on-site management, maintenance, logistics, operations, technical, marine and health/safety personnel and off-site personnel (e.g., human resources, accounting).

## 2.3 Considerations for FortisBC Eagle Mountain – Woodfibre Gas Pipeline Project

Natural gas for the Project will be transported by the planned Eagle Smánit (Mountain) – Woodfibre Gas Pipeline (EGP). This new pipeline will be built by FortisBC and its contractors. As part of its EGP Project, FortisBC is developing its own GCSP, as required by the EAO. Key points regarding the FortisBC EGP Project include:

- FortisBC estimates up to 600 workers (maximum number at any given time) between 2023 and 2026. The number of workers will vary based on the construction schedule.
- FortisBC is committed to encouraging the use of local and regional workers where feasible.
- FortisBC is planning to provide a land-based temporary workforce accommodation within the District of Squamish for non-local workers.

Woodfibre LNG acknowledges that Indigenous Groups, stakeholders, and local governments have a particular interest in considering the combined effects from both the Woodfibre LNG Project and the EGP Project on infrastructure and community services and gender and cultural safety, specifically during construction. While FortisBC and Woodfibre LNG are each, individually responsible for mitigating potential effects related to their respective projects, Woodfibre LNG and FortisBC will consider combined effects of both projects in designing its mitigations where possible. Woodfibre LNG's reporting may include community incidents of gender and cultural violence, harassment or discrimination that involve FortisBC workers, thereby demonstrating the cumulative nature of monitoring and reporting efforts in some instances.

## 3. Gender and Cultural Safety Plan Overview

### 3.1 Objectives

Pursuant to Conditions 26, 27 and 28 of Woodfibre LNG's EAC, the GCSP identifies how the Woodfibre LNG Project will provide programs, services and support to workers and how the Project will mitigate and deter risks associated with gender and cultural safety for workers. Specifically, the GCSP outlines key steps and actions necessary to deter violence and address risks associated with sexual health, mental health, discrimination and gender and cultural safety in the workplace.

The primary purpose of this Plan is to proactively deter, and address discrimination, bias, and inequities related to gender and culture across the Woodfibre LNG workplace and within the Squamish area. This Plan is designed to explain how Woodfibre LNG and its partners plan to create a safe and inclusive environment that respects and supports individuals of diverse genders and cultural backgrounds while focusing on the deterrence and prevention of violence and discrimination within the context of gender and cultural safety.

Key objectives of this Plan are to:

- a. **Promote Inclusivity:** Fostering an environment that values and embraces diversity, ensuring that all individuals feel welcome, respected, and included, regardless of their gender or cultural background.
- b. **Prevent Discrimination:** Implementing measures to prevent discrimination based on gender or cultural factors, including the development and enforcement of policies that promote equality and fairness.
- c. **Deter and address harassment and gender-based violence:** Implementing proactive measures to prevent incidents, coupled with swift and effective responses to promptly address any instances of harassment or violence within a given context.
- d. **Deter and address gender-based violence:** Implementing preventative measures and timely interventions to both discourage the occurrence of such violence and respond effectively to instances, fostering a safer and more equitable environment for women and 2SLGBTQAI+ people.
- e. **Address Bias:** Developing strategies to identify and address unconscious biases related to gender and culture, both at an individual and systemic level, to ensure fair treatment and opportunities for everyone.
- f. **Outline reporting and response protocols:** Reporting and response are critical components to ensuring that the Plan is successful throughout the life of the Project. Monitoring the Plan for compliance and effectiveness will be important to ensure overall success of the Plan.
- g. **Create Safe Spaces:** Establishing physical and emotional safe spaces where individuals can express their gender identity and cultural heritage without fear of judgment or discrimination.
- h. **Reflect Collaboration and Consultation:** Involving stakeholders, including community members, employees, relevant organizations, and Indigenous Groups in the development and implementation of the Plan to ensure it reflects diverse perspectives and needs.
- i. **Ensure Continuous Improvement:** Establishing mechanisms for ongoing evaluation and improvement of the Plan, adapting to changes in societal attitudes, and addressing emerging issues related to gender and culture.

**Appendix 4** provides a listing of how these objectives are aligned with and met by the initiatives and

actions included in the GCSP.

## 3.2 Documentation

All Project documents are managed within Woodfibre LNG's document management system. Woodfibre LNG will issue a GCSP annual report, as described in Section 6 of this Plan, and these reports will be published on the Woodfibre LNG website ([www.woodfibrelng.ca](http://www.woodfibrelng.ca)). Documents are stored in a digital format with secure backup. The digital documents will be considered controlled copies and will indicate that they cease to be controlled copies when printed.

Hard copies of this Plan will be available to the public at all Woodfibre LNG offices and in contractor offices at site. As an alternative, a publicly accessible electronic format may be substituted for hard copies (e.g., a dedicated tablet holding the current documents). Documentation will be maintained for the life of the Project, or longer per any regulatory requirements.

## 3.3 Updates to the GCSP

Woodfibre LNG will review the GCSP at least annually, following the adaptive management process. Adaptive management is a way in which the effectiveness of mitigation measures is evaluated based on monitoring results, and adjusted if required, to achieve desired objectives. The general adaptive management approach is an iterative process that includes problem assessment, planning, implementation of management actions, effectiveness, monitoring, evaluation, with the cycle repeating until the identified uncertainties are sufficiently reduced. While adaptive management will be a continual process, the GCSP mitigations will be reviewed quarterly, and adjustments made to ensure objectives are met. Should unexpected effects occur, they will be reviewed with the appropriate Woodfibre LNG subject matter experts and changes will be implemented as required to address or prevent the unexpected effects. A document history table listing version, date, and distribution is included at the beginning of the GCSP.

This approach is further described in Section 6 of this Plan.

## 4. Gender and Cultural Safety Plan: Policies, Programs and Initiatives

The GCSP will achieve the objectives outlined by the EAC by implementing and adapting various programs, policies, procedures and initiatives. Changes may take place based on feedback from various groups including Indigenous Groups, the community and stakeholders as well as internal committees and working groups. Woodfibre LNG is committed to ensuring that this Plan is a living document and will be revised based on feedback and recommendations, including those from the Gender Safety Advisory Committee. For more information, see Section 6: Monitoring, Reporting, Compliance and Adaptive Management.

This section of the Gender and Cultural Safety Plan will specifically address the following key areas to meet the Plan's objectives:

Section	Description
4.1	Protocols identified in the <b>Worker Code of Conduct</b> and implementation and communication of the Code of Conduct and a <b>Bullying, Harassment and Discrimination Policy</b> .
4.2	Implementation of <b>Bullying and Harassment Training</b> for all Woodfibre LNG workers – employees and management.
4.3	Development of <b>Feedback Mechanisms</b> related to worker experiences and Floatel services.
4.4	Implementation of <b>Confidential Reporting Mechanisms</b> (including a Confidential Reporting Line and procedures to respond to complaints).
4.5	Outlining the role of the <b>Gender Safety Advisory Committee</b> .
4.6	Creation of targeted <b>Gender Safety Programming</b> .
4.7	Implementation of a comprehensive <b>Worker Health and Wellness</b> programming, including <b>Mental Health</b> programming for all workers and <b>Addictions Awareness</b> support and services.
4.8	Continued implementation of a <b>Gender and Cultural Safety Training</b> program for all workers.
4.9	Creation and implementation of a <b>Violence and Harassment Prevention Training</b> program for all workers.
4.10	Creation of <b>Health Reporting and Compliance</b> specific to medical and mental health mechanisms as part of Woodfibre LNG procedures to support compliance to the objectives of this Plan.

*\*Implementation table that describes which sections of the Plan correspond to these objectives (Appendix 4)*

## 4.1 Worker Code of Conduct and Bullying, Harassment and Discrimination Policy

### 4.1.1 Worker Code of Conduct Overview

#### **Overview**

The purpose of Woodfibre LNG's Worker Code of Conduct is to establish a set of guidelines and expectations that govern the behaviour and actions of workers during their employment tenure on the Project. It serves as a comprehensive framework outlining the standards, values, and principles that workers are expected to adhere to while carrying out their duties, whether it be on site while working, or in the broader community, specifically in the Squamish area.

Woodfibre LNG and its construction partners recognize that clearly articulated policies and standards must exist so that there is no confusion around what constitutes accepted versus unacceptable behaviours by all workers on the Project.

#### **Mitigations**

To that end, Woodfibre LNG has implemented a Worker Code of Conduct to ensure clarity and commitment among workers about core values while working on and for the Project. The Code of Conduct is included as **Appendix 5**.

The Bullying, Harassment and Discrimination Policy complements the Worker Code of Conduct and is covered as part of the onboarding process.

#### **Implementation and Communication**

The Worker Code of Conduct is discussed as part of worker orientation. Woodfibre LNG has zero tolerance for any kind of bullying or harassment, including sexual harassment, physical or verbal violence, abuse of power or authority, disrespectful communication, retaliation or any other form of abusive or inappropriate behavior in the workplace. During orientation, workers are clearly informed that these acts constitute a violation of the Code of Conduct. Workers are required to read and acknowledge the Code of Conduct through an online system, thereby agreeing to follow it as a pre-condition to commencing work on the Woodfibre LNG Project, and to potential removal from the workplace, and future ban from work on the Project, in the case of a confirmed and/or serious breach to the Code of Conduct. Workers are also required to sign a hard copy of the Code of Conduct. Signed copies of the Code of Conduct are held by Woodfibre LNG.

Any workers who choose not to sign the Worker Code of Conduct will not be allowed to work on the Woodfibre LNG Project. Contractors' Worker Codes of Conduct must include a description of the process by which Contractors will ensure Workers have reviewed and understand Woodfibre LNG's Code of Conduct. Contractors with unionized employees must ensure that their unions have been provided with a copy of this Worker Code of Conduct and have confirmed their understanding and agreement to its application on the Woodfibre LNG Project by signing it. Every new contractor will have a system in place for having their workers review and sign the Code of Conduct prior to commencing work on the Project, and contractors are responsible for tracking and reporting on the number of workers who sign the Worker Code of Conduct, maintaining relevant records and reporting these to Woodfibre LNG.

The Worker Code of Conduct will be posted in common areas of Woodfibre LNG's corporate office (Vancouver), on the Floatel in common areas of the vessel (i.e., select information terminals) and in common and public areas across the Project site.

Project workers may face disciplinary action for non-compliance, including potential termination of employment or contract, as described in section 4.1.3. Contractors' Worker Codes of Conduct must include guidance on how discipline will be determined for non-compliance, using a similar progressive discipline approach as per the figure in section 4.1.3. If Woodfibre LNG observes that contractors' approach to discipline is not consistent with that of Woodfibre LNG, Woodfibre LNG will establish guidelines for contractors with respect to minimum discipline levels for breach of this Worker Code of Conduct to ensure consistent application and enforcement across the Woodfibre LNG Project. Any suspected breach of this Worker Code of Conduct must be reported to Woodfibre LNG by the contractor or sub-contractor who employed or engaged the worker in question. Contractor-led site health, safety, security and environment personnel will be responsible for tracking personnel who are banned from the site and ensuring that any worker banned from the site or terminated by the Project, is no longer able to access the site.

### **Intended Outcomes**

The Woodfibre LNG Worker Code of Conduct is meant to support a positive and inclusive work environment but also promotes integrity, professionalism, and compliance with legal and regulatory requirements for all workers. By providing a clear roadmap for acceptable and unacceptable behaviour, the Woodfibre LNG Worker Code of Conduct fosters a culture of trust, respect, and accountability among employees, contributing to the overall success and reputation of the company as a whole.

Every worker on the Project must read, understand and accept the terms and conditions of the Worker Code of Conduct by signing the document before commencing work on the Project. Workers who are unwilling to agree to and sign the Code of Conduct will not be able to begin work on the Project.

## **4.1.2 Bullying, Harassment and Discrimination Policy Overview**

### **Overview**

The Woodfibre LNG Project's greatest resource is its people. It is essential to the success of the Project that all workers are provided with, and contribute towards, a respectful workplace where the values of trust, fairness, integrity, consideration and dignity guide our interactions with one another.

Treating others with dignity and respect ensures a professional, healthy and productive work environment. Workers are expected to respect each other as colleagues and the stakeholders with whom they interact. In Woodfibre LNG's diverse and equitable workplace, Woodfibre LNG strives to ensure all workers have the opportunity to contribute fully to the Project's mission, and that each worker's unique contributions are respected and valued.

The purpose of this Policy is to prevent offensive conduct from taking place and to act upon complaints of such behaviour promptly, fairly, judiciously and with due regard to confidentiality for all parties concerned.

Woodfibre LNG's Bullying, Harassment and Discrimination Policy addresses harassment as prohibited under laws of the Province of British Columbia and outlines Woodfibre LNG's standard as it relates to respectful workplace behaviour. Disrespectful behaviour, commonly referred to as "personal harassment," is not covered by human rights legislation, so Woodfibre LNG's Bullying, Harassment and Discrimination

Policy establishes a minimum standard for treating all workers and the public with dignity and respect, while promoting fairness and compliance. The Policy outlines what behaviours are acceptable and unacceptable and provide guidelines for appropriate conduct, ensuring compliance with internal policies and procedures but also with relevant laws and regulations. Furthermore, the Bullying, Harassment and Discrimination Policy establishes a system for reporting and addressing issues, which helps prevent conflicts and maintains a positive organizational culture that values diversity and inclusion. Its goal is to create a positive and inclusive work environment while preventing harassment and discrimination. The Bullying, Harassment and Discrimination Policy is made known to workers and is covered during orientation training.

Key components of the Bullying, Harassment and Discrimination Policy include:

- a. **Definition of Bullying, Harassment and Discrimination:** Clear and specific definitions to ensure a shared understanding among workers.
- b. **Articulation of Respectful Workplace Behaviours:** Clear and specific definitions to ensure a shared understanding among workers.
- c. **Scope:** Clearly states the scope of the policies, specifying that it applies to all employees, workers, contractors, clients, and anyone else associated with the Project.
- d. **Prohibited Behaviours:** Enumerates the types of behaviours that are considered bullying, harassment and discrimination, including but not limited to verbal, physical, or written conduct, cyberbullying, and discriminatory actions.
- e. **Reporting Procedures:** Outline the procedures for reporting incidents of bullying and harassment. This includes details on who to report to, multiple reporting channels, and assurance of confidentiality. See Section 4.4 for a description of reporting mechanisms, including a confidential reporting line.
- f. **Investigation Process:** Clearly define the process for investigating reported incidents, including the roles and responsibilities of investigators and the timeline for completing investigations.
- g. **Consequences and Disciplinary Actions:** Specify the potential consequences for individuals found guilty of bullying or harassment, emphasizing a fair and consistent approach to disciplinary actions.
- h. **Support Services:** Communicate the availability of support services for victims, such as counseling, legal assistance, employee assistance programs or community support services.
- i. **Non-Retaliation Clause:** Include a non-retaliation clause, assuring individuals that they will not face reprisals for reporting legitimate incidents of bullying or harassment.
- j. **Prevention and Training:** Emphasize the organization's commitment to prevention through educational programs and training initiatives (as identified in section 4.2). This may include workshops on diversity, inclusion, and respectful workplace behaviour.
- k. **Communication Plan:** Reference a communication plan to ensure that all employees are aware of the Policy. This may involve distributing the Policy through employee handbooks, training sessions, including orientation training, internal communications channels and on select Floatel information terminals.
- l. **Review and Update:** Specify that the Policy will be reviewed and updated on annual basis to align with changes in legislation, emerging issues, and feedback from employees.

The Woodfibre LNG Bullying, Harassment and Discrimination Policy serves as a foundation for maintaining a positive and respectful workplace culture and fostering a sense of security and trust among workers.

## Mitigations

The focus of the Bullying, Harassment and Discrimination Policy is to ensure a respectful workplace, prevent disrespectful behaviour and outline guidelines to address disrespectful workplace behaviour and any form of bullying, harassment or discrimination should it occur.

Harassment, discrimination, bullying, violence, misuse of power and authority, intimidation, sexual harassment, and any other disrespectful or inappropriate or offensive behaviour are not tolerated. Woodfibre LNG also adheres to applicable employment laws regarding non-discrimination and human rights legislation in the jurisdictions in which the Project operates.

To that end, Woodfibre LNG is implementing the Bullying, Harassment and Discrimination Policy, referenced in the Worker Code of Conduct, that is applicable to all workers in all Woodfibre LNG workplaces and within the community.

### **Intended Outcomes**

Ultimately, the goal of the Worker Code of Conduct and all subsequent and supporting policies and standards, is to ensure that all workers on the Project understand their roles and their responsibilities as it relates to standard of care and the positive and acceptable behaviours that Woodfibre LNG expects of all workers. The focus of this Policy is to ensure a respectful workplace, prevent disrespectful behaviour and outline guidelines to address disrespectful workplace behaviour and any form of bullying, harassment or discrimination should it occur.

Additionally, all workers will understand consequences for breaches of the the Worker Code of Conduct and Bullying, Harassment and Discrimination Policy as it relates to gender and cultural safety, harassment, discrimination or violence.

### **4.1.3 Procedures and Consequences for Non-Compliance**

Woodfibre LNG's approach to managing consequences for breaches of the Worker Code of Conduct and relevant policies, including all forms of harassment, can be characterized as a *progressive discipline approach*. This approach is designed to address and correct unacceptable behaviour in a systematic, timely and fair way. It involves a series of escalating steps, starting with verbal warnings (for minor offenses) and progressing to more formal measures, such as written warnings, suspension, and, ultimately, termination if the issues persist, if the offense is severe enough or if the behaviour is not corrected.

Breaches or reported suspected breaches of the Worker Code of Conduct and policies are reviewed and investigated as per the Project's investigation procedures, and those found to be in violation of the Worker Code of Conduct or Bullying, Harassment and Discrimination Policy, will be subjected to disciplinary actions up to and including termination of employment on the Project. Woodfibre LNG takes seriously any retaliatory action, which is considered a form of harassment. Reported instances of retaliation will be investigated and subject to the consequences outlined in the Worker Code of Conduct, including up to removal from the Project.

Figure 4.1.3 is a visual representation of Woodfibre LNG's approach to progressive discipline, in line with federal labour standards. It is expected that contractors and subcontractors will adhere to this progressive discipline approach.

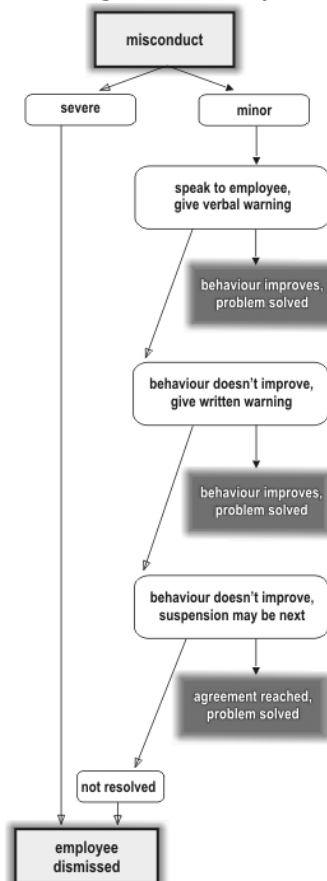
- *Examples of **minor incidents** that may warrant a progressive discipline approach include: absenteeism, poor work performance, and tardiness.*

- Examples of **severe incidents** that may warrant suspension or termination include: violence, discrimination, bullying, harassment, retaliation, assault, theft, and substance use.

The key principle behind progressive discipline is to provide workers with opportunities to improve their conduct or performance through a structured and transparent process, including clear direction/instructions and training opportunities, thereby encouraging accountability and facilitating a positive work environment.

Woodfibre LNG will formally document all incidents and disciplinary actions taken for breaches of the Worker Code of Conduct.

**Figure 4.1.3: Progressive Discipline Approach**



Source: Employment and Social Development Canada<sup>14</sup>

#### 4.1.4 Protecting Against Retaliation

Woodfibre LNG is committed to fostering a culture of integrity and an environment in which employees feel empowered to report concerns without impediment. Woodfibre LNG acknowledges the courage of disclosure and is committed to facilitating a transparent and fair reporting process for investigations.

<sup>14</sup> <https://www.canada.ca/en/employment-social-development/corporate/portfolio/labour/programs/labour-standards/reports/progressive-discipline.html>

Workers will not be subjected to retaliation for speaking out against practices they believe may constitute unlawful discrimination or harassment, for whistle blowing, or for any other legitimate and good faith reporting of a breach of any company policy or procedure, as well as any contravention of a federal or provincial law or regulation.

Retaliation is unlawful and will not be condoned or tolerated on the Project. Retaliation is defined as any negative treatment or adverse action imposed on an individual for engaging in protected activity. Managers and supervisors bear a special responsibility and obligation to ensure that they do not engage in or tolerate retaliation in the workplace, and this is covered as part of violence and harassment prevention training program as outlined in section 4.9

Woodfibre LNG is committed to the protection of all workers against retaliation and follows the *BC Human Rights Code* in ensuring that workers cannot retaliate against another because they:

- Make a complaint or might make a complaint;
- Are named in a complaint or might be named in a complaint;
- Give evidence or help in a complaint, or might give evidence or help; or
- Take part or might take part in an inquiry under the *BC Human Rights Code*.

Any worker who believes to have been subjected to or witnessed discrimination based on retaliation is encouraged to report the incident to the company, to be investigated in accordance with company's procedures for all other incidents of harassment or discrimination. Any supervisor or manager who is found to have engaged in retaliation will be subjected to appropriate disciplinary action, up to and including suspension or removal from the Project.

#### 4.1.5 Standards for Behaviour and Behaviour Indicators

The Worker Code of Conduct and the Bullying, Harassment and Discrimination Policy set a minimum standard for behaviour to which all workers on the Project are expected to adhere. *This standard for behaviour is applicable while on-site and offsite, including in the community of Squamish, being transported to and from a Woodfibre LNG workplace, in any Woodfibre LNG accommodation or any other place that Woodfibre LNG work is conducted, either on duty or off duty.*

The following elements comprise a **Standard for Behaviour**:

- Health, safety and environment:** All workers must comply with all rules, regulations, laws, policies, procedures and standards, either municipal, provincial, federal or corporate. Workers are expected to follow all rules and regulations regarding health and safety as outlined by the various policies and procedures that the company and its partners have developed and implemented across the workplaces and in the community while off duty.
- Drug, alcohol and substance use:** Woodfibre LNG recognizes that one of the most important aspects of working on a major project and construction site is the potential for abuse related to drug, alcohol and other substance use. Woodfibre LNG has implemented a Substance Use Policy and all workers on the Project must comply with this Policy, as well as any relevant laws or regulations regarding the use of any substance while at work. The expectation for use of controlled substances such as drugs and alcohol will be strictly enforced.
- Respectful behaviour:** All workers must comply with the Bullying, Harassment and Discrimination Policy. This includes ensuring that workers are mindful and aware that their actions and behaviours

both on-site and off-site carry a level of expectation that is required of all workers. These behaviours will be reinforced and evidenced through feedback mechanisms, ongoing and regular training, procedures for reporting and non-compliance, and confidential reporting mechanisms.

- d. **Cultural and Gender based violence:** All workers must undergo training during onboarding to recognize and prevent cultural and gender-based violence. Workers will learn to understand that this includes slurs or name calling, contributing to a hyper-masculine environment that makes it uncomfortable for women and 2SLGBTQIA+ peoples, having non-sensitive conversations particularly in front of colleagues from diverse backgrounds and exhibiting lewd behaviour.
- e. **Possessions of weapons:** No worker on site will be permitted to possess any weapons, for any reason. It is also expected that all workers understand and follow the law related to the possession of and use of weapons while off duty.
- f. **Community safety and respect:** All workers on the Project are expected to carry themselves in a respectful and decent manner at all times. This includes on-duty while at work and while off-duty in the Squamish area. Each worker's standard of care within the local Squamish community is of utmost importance and Woodfibre LNG and its partners expect all workers to behave in a way that is ethical, respectful and non-violent.

### **Behaviour Indicators**

Woodfibre LNG will use and look at behaviour indicators – that is, observable and measurable actions, activities or conduct exhibited by workers – to recognize incidents of violence and harassment.

These behavioural indicators can encompass a broad range of actions, including communication style, team dynamics, actual incidents or near-misses (as they relate to bullying, harassment, discrimination and/or violence), usage of services, retention, absenteeism, and adherence to established policies and guidelines. By clearly identifying, measuring and monitoring these indicators, the Project will ensure it is adaptive in terms of how it responds to incidents, but also how it will mitigate and prevent future problem behaviour within the workforce.

The following behavioural indicators will be collected and tracked by contractors and subcontractors. This list will continue to be expanded or amended over time, based on feedback from the Gender Safety Advisory Committee, the Floatel Workplace and Cultural Committee, and others, and as reporting on the GCSP occurs:

- Number of verbal or written/warnings (“near-misses”) as a result of minor breaches to the Worker Code of Conduct;
- Number of suspensions or terminations as a result of severe breaches to the Worker Code of Conduct;
- Number and type of incidents reported, through relevant procedures, to supervisors/managers, on-site security, medical personnel, or Human Resources personnel (e.g., sexual assault, cultural violence, lewd behaviour);
- Use of reporting mechanisms, including the Confidential Reporting Line, and the types of inquiries or complaints received;
- Use of referral services and third-party providers for mental health supports;
- Use of medical services onboard the Floatel;
- Number of workers who quit the Project, by worker demographic (with specific attention to women, Indigenous peoples and 2SLGBTQIA+ peoples);
- Number of workdays missed, by worker demographic (with specific attention to women, Indigenous peoples and 2SLGBTQIA+ peoples); and

- Other statistics related to gender and/or cultural based violence, collected by Woodfibre LNG as per the gender programming described in section 4.6 (i.e., research project).

The Company is committed to the process of adaptive management and understands that behaviour indicators and the measures used to assess and monitor these behaviours may change over time. Woodfibre LNG will seek feedback from the various stakeholders to ensure that the measures and indicators remain relevant and practical for the stage of the Project. Woodfibre LNG will also work to address early signs of harassment and violence in the workforce and any feedback from the Gender Safety Advisory Committee and other stakeholders will be incorporated into potential future changes around the types of measurements the Project will monitor and report on, as described in section 6.

Woodfibre LNG will respect and protect anonymity in the process of reporting on all behaviour indicators, to Indigenous Groups and the Gender Safety Advisory Committee as part of quarterly reporting described in section 4.5.1, as part of reports described in section 6.5, and will only report on indicators to the extent that it is possible to protect personal identifying characteristics of workers employed on the Project. As such, in some cases, detailed reporting on behaviour indicators may not be possible and Woodfibre LNG will report more aggregate information, such as number of violations to the Worker Code of Conduct and number of visits to on-board medical clinic (occupational vs. non-occupational related).

## 4.2 Bullying and Harassment Prevention Training

### Overview

The purpose of Woodfibre LNG's bullying and harassment prevention training is to educate workers and managers about what constitutes acceptable and unacceptable behaviours, how to recognize, prevent, and report incidents of bullying and harassment, and to foster a workplace culture that promotes respect, inclusion, and the prevention of harmful conduct.

### Mitigations

Through training, workers gain the knowledge and skills necessary to contribute to a safe and supportive work environment, understand the impact of their actions, and actively participate in creating a workplace free from bullying, harassment, and discrimination. Training also helps the organization meet legal obligations, mitigate risks, and build a positive workplace culture.

Participants completing this training will be taught to be able to define, describe and/or recognize:

- Workplace bullying and harassment;
- Workplace violence;
- Sexual harassment;
- Discrimination in the workplace;
- Effects of bullying and harassment;
- The Role of the Bystander;
- When workers themselves might be the ones who are harassing or discriminating against others;
- Duties of employers, supervisors, and workers, with respect to workplace bullying, harassment and discrimination;
- The complaint process;
- Workplace investigations;
- How to support a victim;

- Psychological safety; and
- How to respond to situations involving workplace bullying and harassment.

### **Implementation**

The implementation of Woodfibre LNG's Bullying and Harassment Prevention Training involves a comprehensive and proactive strategy that begins with top-level commitment and permeates through to on-the-ground workers. Training is tailored to address specific workplace dynamics and scenarios, incorporating a variety of formats such as workshops, in person training, and e-learning modules to accommodate different learning styles. Woodfibre LNG is currently advancing discussions with the Ending Violence Association of B.C. to determine the best fit for bullying and harassment prevention training that will be implemented during Floatel occupancy. Ending Violence Association of B.C. is an established provider for training that include "Train the Trainer" programming to ensure there are voices that are trained in identifying, discussing and addressing gender based violence within the Project, as well as a "Be more than a Bystander" program, which fosters a culture of speaking up and not tolerating gender and cultural violence (reporting and peer to peer engagement are forms of speaking up).

Quarterly updates and evaluations will take place, with input from the Gender Safety Advisory Committee, to ensure that the training remains relevant and effective, while ongoing support systems and a positive workplace culture reinforce the message that bullying and harassment (along with any forms of discrimination or violence) will not be tolerated.

### **Intended Outcomes**

Bullying and harassment prevention training serves a crucial purpose in the workplace by addressing and mitigating the pervasive issues of bullying and harassment. Its primary aim is to educate workers about the harmful effects of such behaviours, both on individuals and the broader community, and to equip them with the necessary tools to prevent and intervene in instances of bullying and harassment.

The intended outcomes of the bullying and harassment prevention training are multifaceted and extend beyond simply raising awareness. One key outcome of the training is the cultivation of proactive strategies for preventing bullying and harassment, such as promoting bystander intervention and establishing clear reporting mechanisms. Additionally, workers will develop skills in conflict resolution, empathy, and communication, which are essential for addressing and resolving instances of bullying and harassment effectively. Finally, the goal is to create lasting cultural change where bullying and harassment are not tolerated, and every worker can thrive in a safe and supportive environment.

## **4.3 Worker Feedback Program**

### **Overview**

A worker feedback program will be designed and implementation will begin, once the Floatel becomes occupied by workers, to promote an open and transparent environment where workers can share their experiences, thoughts, and suggestions about their workplace, including ways to make it safer and more enjoyable. It will include ensuring the opportunity to provide feedback based on gender and cultural experience but will also be used as a mechanism to receive feedback more broadly from workers about their experiences residing on the Floatel and how to improve amenities, including physical and mental health services and recreational / leisure facilities.

### **Mitigation**

Woodfibre LNG recognizes that feedback related to worker experiences while working on the Project and residing at the Floatel will be critical for long-term success of the Project. By openly and promptly addressing issues and concerns by workers, the Project will support creating an environment in which all workers can feel safe and productive.

Key features of the Worker Feedback Program will include:

- a. **Anonymity:** To encourage honest feedback, the Worker Feedback Program will ensure the anonymity of the workers. Workers can share their experiences without fear of retribution.
- b. **Ease of Use:** The Feedback program will be user-friendly, with a simple and intuitive interface that makes it easy for workers to provide feedback. The Worker Feedback Program will be an online or digital tool (e.g., online surveys) but those workers with challenges using tools due to various accessibility reasons will have the opportunity to provide feedback via someone in Human Resources, ensuring confidentiality.
- c. **Categorization:** Feedback will be categorized into different areas such as overall work environment, management, work-life balance, diversity and inclusion (including culture and gender considerations), recreational / leisure services, safety, etc. This helps to better analyze and understand the feedback.
- d. **Actionable Insights:** Feedback garnered through the Worker Feedback Program will be analyzed to provide actionable insights to the management and stakeholders. This will assist in making informed decisions to improve the worker experience.
- e. **Regular Updates:** The Program will have mechanisms in place to ensure prompt closing of issues as they are submitted. This ensures that the feedback is current and relevant while giving workers comfort that their feedback is being heard and addressed.
- f. **Open Communication:** The Worker Feedback Program will promote a culture of open communication and alongside the Floatel and Workplace Culture Committee, it will be a vehicle for workers to make recommendations to management, leadership and each other for how to improve the workplace. It will allow workers to see how their feedback is being used to make improvements.
- g. **Measurement and Reporting:** The Program will also be part of reporting to management and to stakeholders regarding such things as: the amount of feedback received, types of feedback, status of such feedback, and actions taken to address or handle feedback, as described by other sections in this Plan.

## Implementation

The approach to implementing the Worker Feedback Program will prioritize open communication, employee engagement, and continuous improvement. The Program will have clear objectives and goals, ensuring alignment with the Project's overall goals and objectives. The purpose of the Worker Feedback Program will be to clearly communicate the benefits of program transparency for employees, emphasizing its role in fostering a culture of improvement and growth.

There will be multiple feedback channels that will cater to diverse communication preferences, including conducting a survey once per quarter for the first two quarters that the Floatel is operational, and adjusting frequency thereafter depending on the response to and value of the surveys, as determined by Woodfibre LNG, the Gender Safety Advisory Committee, the Floatel and Workplace Culture Committee and other stakeholder groups. Other feedback channels will include one-on-one discussions, and anonymous suggestion boxes (digitally) led by the Floatel operator and available on the app, where feedback will be provided directly to and responded by Floatel operator personnel (noting that responses may not be

directly provided back to workers if they wish to anonymous). Workers are also able to submit requests, complaints or concerns directly to Woodfibre LNG through its website, and can receive a response back, unless they wish to remain anonymous (<https://woodfibrelng.ca/contact-us/>). The Worker Feedback Program will ensure that feedback mechanisms are user-friendly, accessible, and confidential where necessary, to encourage honest and constructive input. Analysis of the collected feedback, identifying trends and areas for improvement will be shared and used to inform future decisions about ways to improve the Floatel and workplace, including programs, services and other offerings. Finally, the Worker Feedback Program will provide timely and specific feedback to workers on their input, acknowledging their contributions to the Program and to potential future improvements and changes.

### Intended Outcome

The Worker Feedback Program will be designed to allow Woodfibre LNG and its partners to understand workers' experiences and allow for the Project to make necessary improvements to enhance the overall employee experience. The primary goal of the Program will be to foster a culture of continuous improvement and open communication, leading to a more engaged and satisfied workforce whilst addressing the inherent needs around culture and gender on the Project.

## 4.4 Reporting Mechanisms

Woodfibre LNG has established procedures to ensure workers have clear mechanisms available to support them with cases of bullying, harassment, discrimination, medical or mental health issues, and violence, including gender or cultural-based violence. These procedures are outlined as part of the Bullying, Harassment and Discrimination Policy and will be communicated to all workers as part of onboarding and during training (e.g., bullying, harassment and violence prevention training). Individuals have the option of reporting serious incidents directly to the police.

### Mitigations

Reporting mechanisms are intended to create a safe and supportive means for workers to report incidents without fear of reprisal or breach of privacy. Key features of all reporting mechanisms include the following:

- a. **Privacy Protection:** Recipients of reported incidents or complaints will protect individuals' privacy. Information shared will be kept confidential, and only authorized personnel, such as Human Resource professionals or designated mental health personnel, will have access to the details, on a need-to-know basis.
- b. **Non-Retaliation Assurance:** Workers who report can be assured that they will not face negative consequences or retaliation for making reports. This encourages a culture of openness and trust across the Project.
- c. **Comprehensive Support Services:** Woodfibre LNG will ensure workers who report incidents will have access to comprehensive mental health and counseling support services. This may include a mix of access to Employee Assistance Programs (EAPs), counseling services, and other resources aimed at promoting overall mental well-being, including services offered by PearlSpace if the victim wishes to use them (e.g., Third-party reporting to police).
- d. **Clear Communication Protocols:** Woodfibre LNG will ensure clear communication protocols, outlining for the worker making the report the investigative steps that will be taken after a report is made.
- e. **Training and Awareness:** Workers will be educated about the existence and purpose of reporting

mechanisms and support services, through information being posted in common areas of the Floatel and on-site. Training programs will help raise awareness about mental health, reduce stigma, and inform individuals about the available resources for seeking help.

It is recognized that depending on the nature of the incident and the level of workers' comfort with reporting, workers may choose to report through any of the below available mechanisms:

- Reporting to the worker's direct supervisor;
- Reporting to on-site Floatel security;
- Reporting to on-site medical personnel;
- Reporting to Woodfibre LNG designated personnel (including Indigenous Floatel Cultural Manager or member representative of the Floatel and Workplace Culture Committee);
- Reporting to PearlSpace who supports victims and can provide third-party reporting to police;
- Reporting directly to the police;
- Reporting to Woodfibre LNG's confidential information line / online portal that is managed by senior Company personnel (option to remain anonymous, <https://woodfibrelng.ca/contact-us/>); and/or
- Reporting to a third-party managed, 1-800 confidential reporting line, as described below.

Woodfibre LNG will implement a confidential, 1-800 reporting line, and this will be active for use at the time that the Floatel becomes occupied by workers, to allow workers to report concerns, issues, or incidents, including those related to potential gender-based violence, while maintaining a high degree of confidentiality and without fear of reprisal. The confidential reporting line will allow for anonymous reporting, enabling workers to share their concerns without revealing their identity. In some instances, anonymous reporting will not be possible, for example, where reporting of the incident to the police or government agency, by the Company or by an agency that supports the victim (e.g., PearlSpace), is required by law. The reporting line is managed by a third-party, and all information collected will be provided confidentially to Woodfibre LNG to respond as appropriate.

### **Intended Outcomes**

The intended outcome of the reporting mechanisms is to create a safe and secure means for workers to report concerns or wrongdoing on the Project without fear of retaliation. By ensuring confidentiality, these mechanisms encourage open communication and empower workers to share information about unacceptable and unethical behaviour, harassment, discrimination, or any other issues that may compromise workplace integrity. The goal is to detect and address potential problems early, fostering a culture of accountability and transparency. Offering a range of reporting mechanisms helps mitigate risks early, preserves a positive work environment, and demonstrates a commitment to ethical conduct, thus promoting trust and confidence among the workforce.

Finally, Woodfibre LNG's approach to managing consequences for breaches of the Worker Code of Conduct and relevant policies, which includes retaliation for reported breaches, can be characterized as a progressive discipline approach, which is designed to address and correct unacceptable behaviour in a systematic, timely and fair way.

## **4.5 Gender Safety Advisory Committee**

## Overview

In the spring of 2023, Woodfibre LNG established a Gender and Cultural Safety Advisory Committee ("the Committee") to further strengthen corporate commitments around community safety, inclusivity, and respect for diversity. The Committee is dedicated to promoting a safe, welcoming, and equitable environment for all employees, stakeholders, and community members associated with the Project. EAC Amendment #3 included a condition that the Committee remain in place while the Floatel is operational to provide mutual assurance of its ongoing function.

## Mitigations

The Committee has a mandate, defined in a Terms of Reference (see **Appendix 6**), to provide input on Woodfibre LNG gender safety programming and to make recommendations on how the Project manages safety and security impacts for indigenous women and girls, other women and girls in the broader community and 2SLGBTQIA+ people.

## Intended Outcomes

The Committee ensures that Woodfibre LNG operates with the highest regard for gender and cultural safety and helps drive initiatives that promote inclusivity, address gender and cultural concerns, and foster a harmonious and respectful atmosphere within the workplace and the surrounding community.

### 4.5.1 Receiving Reports and Actioning Recommendations

The Committee is a valuable partner and incorporating the Committee's feedback into measurable actions that inform the Gender and Cultural Safety Plan is critical for Project success. The Committee is invited to review corporate policies, practices and procedures, and training and recommend updates or changes, to ensure these align with gender and cultural safety goals. Where possible, Woodfibre LNG seeks to garner Committee input before policies or programs are launched. This includes the Worker Code of Conduct, the Bullying, Harassment and Discrimination Policy and training for senior personnel. The Committee Secretariat is responsible for supporting the co-chairs in developing agendas, taking and disseminating meeting minutes to members, and keeping all records related to Committee business, including members' input and recommendations. Suggestions for follow-up and action by Woodfibre LNG or other parties are logged by the Secretariat into a tracking template. The template is revisited after each meeting and progress on actions is reported at Committee meetings.

The Secretariat supports the Woodfibre LNG President, as co-chair, to ensure that matters/topics of interest to the Committee are discussed by the appropriate parties within the company and with key partners such as the Project's prime contractor, sub-contractors and the Floatel operator.

The Committee will also be invited to receive the aggregate data and quarterly reports from the Project that anonymize any personal information, relating to the:

- number and nature of complaints through confidential reporting mechanisms including the confidential reporting line, and the result or consequence imposed;
- number and nature of incidents of violence or harassment, including gender-based violence, and the result or consequence imposed;
- current status of complaints and incidents;
- utilization of medical services, including mental health services and whether they were provided on-site or were referrals to off-site professionals;
- The behaviour indicators described in section 4.1.4; and

- worker participation in the various training initiatives.

This information will help the Committee provide input on how to improve programming and specific recommendations that could be actioned by the Project.

As noted previously in the Plan, Woodfibre LNG will respect and protect anonymity in the process of reporting on incidents and will only report information to the extent that it is possible to protect personal identifying characteristics of workers employed on the Project. As such, in some cases, detailed reporting of incidents, such as consequences imposed, may not be possible.

#### 4.5.2 Membership

The Committee is comprised of members from Woodfibre LNG and external stakeholders, appointed by Woodfibre LNG, including from the Skwxwú7mesh Úxwumixw (Squamish Nation), the Tsleil-Waututh Nation, Squamish community and community service organizations. The Committee is co-chaired by the Woodfibre LNG President and an elder from the Skwxwú7mesh Úxwumixw (Squamish Nation). Member organizations are listed in the Terms of Reference (see Appendix 6) and members are noted in the Plan's Record of Engagement (see Appendix 3).

The following organizations participate in the Committee as observers, who are encouraged to bring insights and opinions from their own background and experiences. The groups who have agreed to participate as observers<sup>15</sup> are:

- BC Environmental Assessment Office
- BC Energy Regulator
- District of Squamish
- Impact Assessment Agency of Canada
- Ta na wa Yúus ta Stitúyntsah (Squamish Nation Rights and Title)
- FortisBC

## 4.6 Gender Safety Programming

### Overview

Gender safety in the workplace refers to creating an environment where individuals of all genders and identities feel secure, respected, and valued. It encompasses policies, practices, and cultural norms that prevent discrimination, harassment, and bias based on gender identity or expression. This includes providing equal opportunities for career advancement, fair treatment in opportunities and promotions, and ensuring that all employees are protected from any form of gender-based violence or harassment.

Woodfibre LNG's gender safety programming initiatives will involve various programs and services that foster and support an inclusive atmosphere where diverse gender identities are acknowledged and supported, and where everyone feels empowered to speak up against any instances of discrimination or mistreatment. Ultimately, it aims to cultivate a workplace culture where individuals can thrive regardless of their gender identity or expression.

### Mitigations

In addition to the BC EAO requirements for a Gender and Cultural Safety Plan, Woodfibre LNG has

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<sup>15</sup> Justice for Girls was invited but has not yet accepted participation in the Committee.

developed and is implementing **training initiatives** to promote gender equity, raise awareness of gender-based violence, and to address findings of national inquiries and new information provided by those with lived experience or expertise in this domain. Training will continue to evolve to remain relevant and to incorporate ongoing feedback from Indigenous Groups and community members and the Committee. The training initiatives developed to date are summarized in the below table.

**Table 5: Gender Safety Training Initiatives**

Planned Initiatives	Key Objectives	Anticipated Minimum Frequency
Personal safety, risk identification and situation awareness training offered by Indigenous and community trainers for people living in Squamish area	Reduce vulnerability to assault and increase personal confidence and security, particularly among women and girls, including people who identify as Indigenous and 2SLGBTQIA+	Quarterly)
Consent training for local high schools in Squamish area offered by community not-for-profit organizations	Reduce vulnerability of youth and provide a long-term benefit to the community	Annually
Mandatory harassment prevention training provided to all Woodfibre LNG workforce (see <b>section 4.9</b> )	Increase knowledge of what constitutes harassment, reduce incidents and ensure workers understand procedures for reporting and consequences for violating policies / code of conduct	Ongoing and required as part of orientation and as a condition of employment, with annual refresher training required
Mandatory cultural awareness training provided to all Woodfibre LNG workforce - delivered by Skwxwú7mesh Úxwumixw (Squamish Nation) members (see <b>Appendix 7</b> – training materials)	Ensure workers have a strong understanding of the cultural relevance and significance of the Skwxwú7mesh Úxwumixw (Squamish Nation) and other Indigenous Groups, including the disproportionate impacts of violence on Indigenous women and girls	Ongoing and required as part of orientation and as a condition of employment
Training for Human Resources and medical staff to manage disclosures	Help personnel to support workers who disclose sexualized or gender-based violence, harassment or discrimination, including mental health training to provide short-term or crisis support as required	Annually
Training to discourage bystander behaviour	Foster a culture of speaking up and preventing bystander behaviour in the workplace	Quarterly
Training capacity to the local women's centre, Pearl Space	Support local women and girls who experience and confidentially report harassment or gender-based violence, whether or not related to the Project	Annually

Although not required by the EAO amendment, Woodfibre LNG is funding and governing a graduate-level **research project** to design, implement and collect regional data related to incidents of sexual and gender-based violence, harassment and bullying in the community during the construction phase of the Project. The graduate project was initiated by a Project Manager from the University of Victoria in September 2023 and will conclude when the construction phase ends. The graduate project will collect and monitor key statistics related to sexualized and other violence, sexually transmitted infection rates, incidents of harassment and others. The findings will provide insight to better understand trends and the relationship between industrial development projects and violence against Indigenous women, girls and 2SLGBTQIA+ people. Similar studies have previously been conducted for other areas of the province where there are industrial projects being constructed, namely, northern B.C. where LNG Canada and major mine projects operate<sup>16</sup>. However, this study will provide targeted data for the Squamish area.

The findings will be reported to the Gender Safety Advisory Committee and Woodfibre LNG on a quarterly basis and will support development of new policies and programs or help improve existing ones. Findings and recommendations will be actioned as per the process described under the mitigations of section 4.6.

Findings that reflect *community* incidents of gender and cultural violence, harassment or discrimination may involve FortisBC workers, in addition to Woodfibre LNG workers, thereby illuminating cumulative impacts of both projects in the community of Squamish. This has been raised as a key issue by community members and the District of Squamish.

### **Intended Outcomes**

The intended outcome of the Project's gender safety programming is to create an environment that prioritizes the safety, well-being, and equitable treatment of individuals irrespective of their gender identity or expression.

This programming endeavors to address and preempt various manifestations of gender-based discrimination, harassment, and violence through the promotion of awareness, education, and the adoption of inclusive policies and practices. By cultivating a culture underscored by respect and gender parity, these initiatives aim to empower individuals to identify and confront detrimental stereotypes and behaviors, ultimately engendering safer and more inclusive surroundings for all. Furthermore, the Woodfibre LNG gender safety programming aspires to provide support to survivors of gender-based violence through the provision of resources, support services, and avenues for reporting and seeking redress. Ultimately, the overarching objective of Woodfibre LNG's gender safety programming is to establish environments wherein every individual feels esteemed, respected, and secure, irrespective of their gender identity or expression.

## **4.7 Worker Health and Wellness**

### **Overview**

Woodfibre LNG's health and wellness programs are comprehensive initiatives designed to support the physical and psychological well-being of the workforce. These programs aim to address the mental and physiological health challenges often faced in the workplace and create a supportive environment that fosters emotional resilience while offering tools and services to improve mental health and health more broadly. Components of Woodfibre LNG's programs will include access to counseling services, services

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<sup>16</sup> [Canadian Resource-Based Projects Associated with Violence ...spectrumjournal.cahttps://spectrumjournal.ca › article › download](https://spectrumjournal.ca/article/download/Canadian-Resource-Based-Projects-Associated-with-Violence/12345)

related to coping strategies, and awareness campaigns to destigmatize health issues.

### **Mitigations**

Woodfibre LNG will offer medical professionals and a robust mental health program to support worker health and wellness, both on and off the Floatel.

#### **4.7.1 Medical Professionals**

As part of Woodfibre LNG's commitment to providing high quality and timely access to medical professionals and resources for workers and to limit the reliance on emergency and non-emergency services in the Squamish area, onsite, offsite and referral services are available to all workers of the Project as it relates to health and in particular, mental health services.

As such, Woodfibre LNG will provide the following medical services on site and on the Floatel:

- a. Qualified medical staff onsite for the project that are available to workers of the Project but also residing and/or living in the Floatel. Woodfibre LNG is making reasonable efforts for these qualified professionals to include, at a minimum, a nurse practitioner.
- b. Medical staff will be available twenty-four hours a day and virtually for those residing or making use of the Floatel.
- c. Medical staff are trained and can provide on-site assistance and referrals related to mental health support.
- d. All medical personnel on site and at the Floatel, will have contact details for Project appointed mental health services that can be provided to workers when required.
- e. All qualified (medical) professionals on site will have training in sexual health and sexual health resources.
- f. The medical facilities on site and at the Floatel will be equipped with and offer services for sexual health and support/resources in sexual health, including options for medical referrals.
- g. Timely access to emergency services for instances of emergency and trauma cases that are not able to be provided by qualified persons on site and available to the Floatel accommodations.
- h. Emergency medical transportation services will be provided by BC Marine Logistics as well as access to provincial emergency health services for those cases that require medical support outside of what can be handled on site by the site-based qualified medical professionals.

### **Intended Outcomes**

The presence of medical personnel is intended to support the preservation of health, safety, and well-being for all workers. These medical professionals contribute specialized knowledge, skills, and resources to promptly address any medical emergencies, injuries, or health-related concerns that may arise.

Their involvement facilitates swift and effective responses to medical incidents, thereby enhancing overall risk management and mitigation efforts and promoting a culture of safety within the work environment. Furthermore, medical personnel will offer guidance and support in implementing preventive measures, conducting health assessments, and promoting wellness initiatives, thus fostering a healthier and more resilient workforce. Their participation will serve to minimize the impact of health-related challenges, maximize productivity, and ensure a safe and supportive working environment for all workers on the Project.

#### **4.7.2 Mental Health Programming**

Woodfibre LNG's mental health programming refers to a set of organized and purposeful activities,

initiatives, and interventions designed to promote, support, and maintain mental well-being. These programs aim to enhance mental health, prevent mental illnesses, and provide support for individuals experiencing mental health challenges. Woodfibre LNG's mental health programming will encompass a wide range of initiatives, including awareness campaigns, education and training sessions, counseling services, support groups, and access to mental health resources while the Floatel is in operation.

Woodfibre LNG's mental health programming will include cooperative efforts between mental health experts, corporate leaders, educators, and other relevant stakeholders to formulate comprehensive and impactful strategies for enhancing mental well-being in the workplace.

Key components of mental health programming for Woodfibre LNG will include:

- a. **Education and Awareness:** Providing information about mental health conditions, their prevalence, symptoms, and available treatments. This aims to reduce stigma and increase understanding.
- b. **Prevention and Early Intervention:** Programming focused on preventing mental health issues through mental-health management, resilience-building, and early identification of potential concerns. Early intervention strategies can help mitigate the impact of mental health challenges.
- c. **Counseling and Support Services:** Offering counseling services, helplines, or support groups to provide individuals with a safe space to discuss their concerns, seek advice, and receive emotional support.
- d. **Skill-building and Coping Strategies:** Includes workshops or training sessions to teach individuals coping strategies, stress management techniques, and resilience-building skills to better navigate life's challenges.
- e. **Policy and Advocacy:** Mental health programming often involves advocating for policies that support mental health, including workplace mental health policies, anti-stigma campaigns, and improved access to mental health care services.
- f. **Engagement:** The program will frequently engage the workforce, fostering a sense of belonging and social support, reducing isolation and promoting mental well-being.
- g. **Workplace Wellness:** The mental health programming may include initiatives to create a psychologically safe and supportive work environment. This could involve employee assistance programs, mental health training for managers, and flexible work arrangements.

To meet the Plan's goals of supporting the workforce, Woodfibre LNG and its partners will develop and implement the key programs outlined in Table 6, to begin once the Floatel is operational.

**Table 6: Mental Health Programs and Services**

Action	Description
<b>Referral services to mental health support</b>	Available on-site by medical professionals (including a Nurse Practitioner) or virtually, where workers can speak to mental health providers confidentially while on the Floatel, or back in their home community. This service would be offered as part of Woodfibre LNG's and contractors' Employee Assistance Programs.
<b>Engage a third-party specializing in providing mental health services</b>	Woodfibre LNG will utilize mental health services providers including publicly available services <i>after</i> internal services such as Company and contractor provided Employee Assistance Programs (EAP) are used. Third-party service providers will

	supplement Company and contractor programs when specialized mental health support is required for workers.
<b>Provide regular and on-going training specific to mental health issues for all managers and leaders</b>	Specialized and ongoing training for leaders and managers will take place to not only provide support for their team members, but to also understand and recognize the signs of mental health issues.

### **Intended Outcome**

Overall, mental health programming will play a crucial role in building a resilient and supportive Project, fostering a greater understanding of mental health issues, and ensuring that workers have access to the resources and support they need to maintain good mental health.

### **4.7.3 Addiction Awareness**

Addiction awareness refers to the understanding and recognition of the complexities surrounding substance use and behavioural addictions. It involves increasing knowledge about the causes, consequences, and impact of addiction on individuals, families, and communities.

Woodfibre LNG has a zero-tolerance alcohol and drug standard, and the Project offers support and training to ensure addiction awareness. This approach complements the decision to make the Floatel and the entire Project site a “dry” camp. Workers will not have the ability to purchase or consume alcohol on site or within the Floatel facilities, including worker’s own private living spaces, and workers will not have access into the District of Squamish while on duty. Enforcement of these rules will take place by way of searches of workers’ belongings as they come onto the Floatel.

The Woodfibre LNG’s addiction awareness program will aim to educate workers, including health, safety and security personnel, about the signs and symptoms of addiction, the physiological and psychological aspects of substance use, and the available resources for prevention, intervention, and treatment. These initiatives will seek to reduce stigma, promote empathy, and encourage early intervention to address addiction issues.

By fostering awareness, the program will contribute to creating a more informed and supportive work environment that is better equipped to tackle the challenges associated with addiction and substance misuse.

### **Access to Services**

Workers will be able to access addiction related services through various onsite and offsite providers, while on or off-duty. Onsite, workers will have access to medical professionals who have been trained in recognizing and providing referrals to trained addiction service professionals. In certain cases, workers may access services offered through B.C. health authorities, such as Vancouver Coastal Health and Fraser Health<sup>17</sup> or from the publicly funded health providers where they reside. Additionally, the B.C. Centre on Substance Use has various educational resources including information for families and individuals that provide support for those looking for information, through to finding trained professionals who support individuals with substance use disorder(s).

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<https://www.vch.ca/en/health-topics/mental-health-substance-use>; <https://www.fraserhealth.ca/health-topics-a-to-z/mental-health-and-substance-use#.XO7Sf001uUk>; <https://www.healthlinkbc.ca/mental-health-substance-use/resources>; <https://helpstartshere.gov.bc.ca/>

## Training

Woodfibre LNG's addiction awareness training will encompass a comprehensive set of educational initiatives designed to enhance worker's understanding of various aspects related to addiction, including its physiological, psychological, and social dimensions. This training aims to equip workers with the knowledge and skills necessary to recognize, address, and prevent substance use and behavioural dependencies. The training will be provided as a part of worker orientation.

The key components of Woodfibre LNG's addiction awareness training will include the exploration of risk factors, signs, and symptoms associated with addictive behaviours, as well as an examination of the impact on individuals, families, and communities.

Additionally, the training may delve into such areas as:

- a. Evidence-based intervention strategies
- b. Harm reduction approaches, and
- c. The available resources for supporting individuals affected by addiction.

## Intended Outcomes

The overarching goal of addiction awareness training is to foster a proactive and informed approach to addiction-related issues, contributing to a more compassionate and responsive workers that actively works towards reducing the prevalence and negative consequences of addiction.

By carefully implementing these elements, Woodfibre LNG will create a reporting and compliance framework that not only addresses addiction concerns effectively, but also upholds the ethical and legal standards associated with handling sensitive information. This comprehensive approach contributes to a workplace culture that prioritizes worker health, fosters trust, and demonstrates a commitment to compliance and employee well-being.

## 4.8 Gender and Cultural Safety Training

### Overview

Woodfibre LNG's gender and cultural safety training seeks to increase awareness and understanding of gender and cultural differences, promote respectful and inclusive interactions, and create an environment where individuals from diverse backgrounds feel safe and respected.

While the concept originated in healthcare setting<sup>18 19</sup>, it has expanded to various industries and sectors. Gender and Cultural Safety training often addresses issues related to power imbalances, historical trauma and systemic discrimination that can affect individuals from marginalized or minority cultures.

### Mitigations

Woodfibre LNG and its partners include the following key components into its gender and cultural safety training program:

- a. **Cultural Competence:** Developing cultural knowledge, particularly traditions and values of the Skwxwú7mesh Úxwumixw (Squamish Nation).
- b. **Awareness of Bias and Stereotypes:** Recognizing and challenging personal biases and stereotypes to prevent discrimination.

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<sup>18</sup> First Nations Health Authority, 2021

<sup>19</sup> Council of Medical Colleges and Te Ohu Rata o Aotearoa, Māori Medical Practitioners Association, 2023

- c. **Risks for Indigenous Women and Girls:** Understanding the historical and current risks that industrial camps have had on Indigenous women and girls in Canada and national inquiry calls for justice.
- d. **Understanding Historical Context:** Exploring historical factors that may have contributed to systemic inequalities and cultural misunderstandings.
- e. **Communication Skills:** Learning effective communication strategies that respect diverse perspectives, foster open dialogue, and support skill development for respectfully interacting with people from different cultural backgrounds.
- f. **Creating Inclusive Environments:** Promoting practices that ensure everyone feels welcome, valued, and included.
- g. **Intersectionality:** Recognizing the intersecting aspects of identity, such as race, gender, and socioeconomic status, and understanding how they can impact individuals differently.

Woodfibre LNG offers gender and cultural safety training, regularly in-person on-site in Squamish for the construction workforce, and in Vancouver for corporate employees, as part of orientation and onboarding. The training is delivered by women of the Skwxwú7mesh Úxwumixw (Squamish Nation). Participation in the training is logged, tracked and reported by contractors to management and will inform quarterly reporting to the Gender Safety Advisory Committee and Indigenous Groups. See **Appendix 7** for training material.

#### **Intended Outcomes**

Gender and Cultural Safety training is intended to establish a work environment that prioritizes respect, inclusivity, and comprehension, particularly concerning gender and cultural diversity. Through structured educational programs and awareness initiatives, this training endeavors to teach and train workers and management with the requisite knowledge, competencies, and perspectives to identify and address issues pertaining to gender and cultural safety effectively.

Ultimately, the overarching aim of Gender and Cultural Safety training is to engender a culture characterized by equity, dignity, and acceptance, where disparities are acknowledged, and individuals can prosper devoid of harassment, discrimination, or marginalization rooted in their gender or cultural identity.

## **4.9 Violence and Harassment Prevention Program**

#### **Overview**

Woodfibre LNG will develop a dedicated violence and harassment prevention program, including sexual harassment prevention, that will be provided to all workers through a training session as part of orientation. Supervisors will undertake a more robust program.

#### **Training For the Workforce**

The key elements of Woodfibre LNG's violence and harassment prevention program will be structured educational programs designed to equip workers with the knowledge of what constitutes harassment and skills needed to recognize, prevent, and address instances of violence and harassment (including discrimination), which are stated as unacceptable behaviours in the Worker Code of Conduct and Bullying, Harassment and Discrimination Policy. The program will also highlight to workers the procedures for reporting incidents and potential consequences for exhibiting any form of violence, harassment and/or discrimination.

Topics around violence and harassment prevention will cover topics such as recognizing signs of potential violence or harassment, including sexual harassment, understanding the legal and ethical implications, promoting a culture of respect and inclusivity, and understanding reporting mechanisms and procedures. The goal is to empower individuals to contribute to the creation of a secure and supportive atmosphere, fostering a workplace and community free from violence and harassment.

A key component of the violence and harassment prevention training is to increase self-awareness and accountability for workers who may, unknowingly, be actively partaking in harassment, and to encourage appropriate behaviours both while on and off duty. Beyond reiterating the standard for behaviour while employed on the Project (as outlined in section 4.1.5), the following strategies will be covered as part of the training program:

- Communicating that harassment takes many forms and may be covert, such as: gaslighting, emotional manipulation, spreading gossip and rumours, social isolation, insults, rude or offensive remarks, gestures that seek to intimidate, silent treatment and passive-aggressiveness.
- Offering workers reflection exercises for workers to recall past incidents in which they witnessed or may have exhibited harassing behaviour, to increase recognition and understanding – e.g., how they felt about the situation, what the impacts were (on them and others), how it was handled, and the extent to which the individuals' behaviour changed.
- Sharing techniques for workers to manage their own behaviour, particularly in the case of a potential conflict.

Training will be delivered as a part of worker onboarding, using video and discussion materials, with refresher training once a year.

### **Training For Management and Leadership**

Training for management and leadership on violence and harassment prevention will go beyond general worker training by focusing on the specific responsibilities and roles of those in leadership positions. This specialized training will equip managers and leaders within Woodfibre LNG and all contractors with the knowledge and skills to effectively address and prevent violence and harassment within their teams and the broader Project environment.

Management and leadership training will cover topics such as: recognizing early warning signs, understanding and recognizing situations where managers may be the ones who are harassing someone else or taking part in harassment, responding to complaints, conducting thorough investigations, and implementing proactive measures to foster a culture of respect and inclusivity. Managers will also learn how to create and enforce policies that promote a safe working environment.

The key difference from training provided to regular workers lies in the depth of managerial training, which includes leadership-specific strategies for preventing and addressing issues, as well as guidance on creating a workplace culture that prioritizes prevention and intervention. Overall, leadership training is tailored to empower managers to take a proactive and decisive role in creating and maintaining a safe and respectful workplace.

Training will be delivered and is required to be completed upon onboarding, and then on an annual basis. Contractors and subcontractors are required to monitor and track enrolment and completion of training for their workers, and report this to Woodfibre LNG.

### **Mitigations:**

Harassment and violence prevention training in the workplace will consist of several key components aimed at educating workers and managers about what constitutes harassment and violence, how to prevent it, and what actions to take if harassment occurs. Here are some of the key components:

- a. **Definition of Harassment and Violence:** The training will begin with a clear definition of harassment and violence, including sexual harassment, discrimination, violence, and any other behaviours that create a hostile or uncomfortable work environment.
- b. **Examples and Scenarios:** Examples and scenarios will support learning by allowing workers to understand what constitutes harassment and violence in various contexts. Real-life examples or case studies can illustrate different forms of harassment and how they might manifest in the workplace.
- c. **Legal Framework:** Workers will be informed about relevant laws and regulations governing harassment and violence in the workplace, including federal and provincial laws and regulations, as well as company policies and procedures.
- d. **Impacts of Harassment:** Training will emphasize the negative impacts of harassment on individuals, teams, and the organization as a whole. This can include emotional distress, decreased morale and productivity, and legal consequences for both the harasser and the organization.
- e. **Prevention Strategies:** Workers will be taught strategies for preventing harassment and violence, such as treating others with respect, maintaining professional boundaries, and speaking up if they witness or experience harassment.
- f. **Reporting Procedures:** Workers will learn how to report harassment and violence and who to report it to. Training will cover the company's reporting procedures, including multiple reporting options and protections against retaliation.
- g. **Investigation and Resolution:** Workers will understand what happens after a harassment report is filed, including how the company will investigate the complaint, take appropriate action, and provide support to those involved.
- h. **Role of Managers and Leaders:** Leaders play a key role in preventing and addressing harassment and violence in the workplace. Training will include specific guidance for managers on how to recognize, respond to, and prevent harassment among their team members.
- i. **Promotion of a Positive Culture:** Training will emphasize the importance of fostering a culture of respect, inclusion, and diversity in the workplace, where harassment and violence is not tolerated and everyone feels safe and valued.
- j. **Regular Reinforcement and Updates:** Harassment and violence prevention training will not be a one-time occurrence. It should be regularly reinforced and updated to reflect changes in laws, policies, and best practices, as well as to address emerging issues or trends.

By incorporating these key components into harassment and violence prevention training, Woodfibre LNG will create a safer and more respectful workplace for all workers.

### **Intended Outcomes**

Through comprehensive training, workers and managers are taught to identify the signs and ramifications of violence, harassment and discrimination, including physical, verbal, psychological, and sexual forms, while comprehending the legal and organizational frameworks governing these matters. Additionally, workers will be trained in the complaint reporting process, including the procedures for making a complaint but also the roles and responsibilities of all workers (which includes managers) should they be required to take part in the complaint process as it relates to harassment, bullying and/or discrimination.

Finally, all workers (which includes managers), will learn what constitutes acceptable versus unacceptable behaviour as it relates to harassment, bullying and discrimination in and outside of the workplace. By ensuring all workers understand what is acceptable or not acceptable behaviour, they will be able to apply these learnings in and out of the work environment.

This training aims to create a safe and respectful environment by educating workers on identifying various forms of violence and harassment, understanding the impact on individuals and the workplace, and providing strategies to intervene and prevent such behaviours. Ultimately, this training is intended to help workers meet the standard of behaviour as described by section 4.1.4.

By advocating proactive measures such as effective communication, conflict resolution, and bystander intervention, the training aims to empower employees to contribute to a culture of absolute intolerance towards violence and harassment.

## **4.10 Reporting and Compliance: Medical and Mental Health**

### **Overview**

Reporting and compliance within Woodfibre LNG's medical and mental health programs will be executed through a structured and confidential framework, prioritizing the privacy and well-being of individuals. A clear and transparent reporting mechanism will be established, allowing workers to confidentially share medical and mental health concerns without fear of reprisal and to seek services and support related to mental health.

### **Reporting**

As part of Woodfibre LNG's reporting and monitoring mechanisms, Woodfibre LNG will track the use of and effectiveness of the medical and mental health services it provides on-site and at the Floatel. This will include quarterly reporting to management and to the Gender Safety Advisory Committee.

Reporting and monitoring will include, at a minimum:

- Usage of onsite medical services;
- Usage and engagement of onsite medical and first aid professionals;
- Types services provided, including services provided onsite vs referrals to offsite services/professionals; and
- Tracking of indicators that provide input into the types of complaints that have been dealt with, reported, or observed on the Project.

In all cases, the preservation of personal information will be maintained and access to individual

information will be closely managed by those qualified professionals and under the rules and regulations relating to the handling of personal information in the Province of British Columbia.

### **Compliance**

Compliance with Woodfibre LNG's medical and mental health programs will involve adherence to established protocols, ensuring that reported issues are appropriately actioned, reported and monitored.

Key features of the reporting and compliance process will include:

- a. **Confidential Reporting Channels:** Comprehensive and confidential reporting channels will be implemented, enabling individuals to report mental health concerns through secure and private mechanisms. This will also include anonymous reporting options to encourage open communication.
- b. **Non-Retaliation Assurance:** A commitment to non-retaliation will be emphasized, assuring individuals that report mental health issues will not result in negative consequences. This assurance creates a culture of trust and encourages workers to seek help without fear.
- c. **Comprehensive Investigation Protocols:** Upon receiving reports of incidents, there will be established investigation protocols to thoroughly assess and address the reported concerns. This may involve collaboration with medical and mental health professionals, Human Resources, or relevant stakeholders to ensure a comprehensive and supportive response.
- d. **Privacy Protection:** Strict privacy measures will be in place to safeguard the confidentiality of individuals reporting medical and mental health issues. Only authorized personnel will have access to the information, respecting the sensitive nature of mental health disclosures.
- e. **Training and Awareness:** Employees will be educated about the reporting process and the importance of compliance with medical and mental health programs. Training initiatives will focus on reducing stigma, increasing awareness of available resources, and promoting a culture that prioritizes medical and mental health.
- f. **Regular Monitoring and Reporting:** Quarterly monitoring and reporting mechanisms will be established to track the effectiveness of the medical and mental health programs. This involves assessing the number and nature of reported cases, evaluating interventions, and making continuous improvements to the program based on feedback and outcomes.
- g. **Legal and Ethical Compliance:** The reporting and compliance framework will align with legal and ethical standards, ensuring that all interventions and responses adhere to relevant regulations and guidelines related to medical and mental health in the workplace.

### **Intended Outcomes**

Woodfibre LNG's intent of the outcomes in implementing reporting and compliance programs related to medical and mental health are multifaceted and encompass several pivotal objectives. Primarily, these programs aim to promote the health and well-being of employees by providing mechanisms for confidential reporting of medical and mental health concerns, facilitating early intervention, and ensuring access to appropriate support services. Secondly, these reporting and compliance initiatives seek to establish clear and transparent channels through which workers can report concerns, violations, or unacceptable or unethical behaviour, thereby ensuring timely resolution and mitigation of potential risks. Finally, these programs facilitate ongoing monitoring and evaluation, enabling the Project to identify areas necessitating improvement, implement corrective measures, and continuously enhance its operational efficiency and practices.

## 5. Floatel and Workplace Culture Committee

### Overview

As part of Woodfibre LNG's commitment to ensuring a safe and inclusive work environment and worker accommodation, the Project will implement a Floatel and Workplace Culture Committee. The Floatel and Workplace Culture Committee's mandate is to actively contribute to fostering a positive, inclusive and safe work environment for all workers and residents of the Project. This includes aligning Woodfibre LNG's values with the experiences of employees to promote a balanced work atmosphere.

### Mitigations

Amongst other things, the Floatel and Workplace Culture Committee is responsible for encouraging worker engagement, satisfaction, and overall well-being through the implementation of initiatives shaping the cultural dynamics on the Project. Additionally, the Floatel and Workplace Culture Committee will be instrumental in recognizing and recommending the implementation of strategies to improve the working environment, communication, and overall effectiveness of worker experiences on the Project and at the Floatel. The Committee may involve working groups or sub-committees to explore certain topics that relate to gender and cultural safety, including how to make the workplace safe and inclusive for women, Indigenous peoples and 2SLGBTQIA+ people; for example, how to ensure that health services address women's health needs.

Once the Floatel is operational, the Floatel and Workplace Culture Committee will be established with the following objectives:

- a. To establish and have approved a Terms of Reference for the Committee to operate;
- b. To refine and have approved the mandate of the Committee;
- c. To establish an outline of how to improve the work culture to ensure implementation and effectiveness of the mandate through actions and measures;
- d. To establish protocols for weekly inspections in line with regulations and policies and displayed in locations easily accessible to all workers; and
- e. To review reports from the confidential reporting line as it relates to culture and workplace safety specific to:
  - i. Reports of incidents of assault, harassment, violence or abuse;
  - ii. Ensuring training on the reporting line; and
  - iii. Review prior to submission to the Gender Safety Advisory Committee, all reports related to incidents of assault, harassment, violence or abuse.

Woodfibre LNG recognizes that workplace culture plays a crucial role in nurturing a favorable and inclusive organizational environment, serving as essential components in aligning values with employee experiences.

### Intended Outcomes

The Workplace Culture Committee is established with the intention of fostering a positive and inclusive organizational culture on the Project and at the Floatel, nurturing worker engagement and morale, and addressing matters concerning diversity, equity, and inclusion within the workplace. The Floatel and Workplace Culture Committee endeavors to identify areas necessitating improvement, devise strategies to promote a healthy work environment, and implement initiatives that are consistent with the Project's values and objectives. The Committee will have an important role in working with the Company to review and advise on consequences associated with infractions related to gender and cultural safety, should they

occur on the Floatel, and may support victims of harassment or violence through various mechanisms, including cultural practices, to support healing.

## 6. Monitoring, Reporting, Compliance and Adaptive Management

Woodfibre LNG's approach to monitoring, reporting, compliance and adaptive management of the Gender and Cultural Safety Plan is generally consistent with its approach in the Community Services and Infrastructure Plan (CSIMP). Where issues addressed in the CSIMP overlap with issues addressed in the GCSP, Woodfibre LNG may combine reporting to ensure reports provide a complete picture (for example, number of RCMP visits to the Floatel).

### 6.1 Monitoring

Woodfibre LNG is the accountable party that will monitor all GCSP-related mitigations for the BC EAC Condition 26. Woodfibre LNG will work with McDermott, other contractors and the Floatel operator, using workshops and/or policy reviews to support alignment with the GCSP.

McDermott is required to have in place a CSIMP Lead who will provide reports to the Woodfibre LNG CSIMP Lead on metrics relating to the GCSP. McDermott will gather the required information from all sub-contractors, including the Floatel operator, and include that information in its monthly report. These reports will allow Woodfibre LNG to evaluate its compliance and its effectiveness to adjust the mitigations where and when required. As per Condition 26, monitoring will occur throughout the operation of the Floatel.

The process to monitor compliance considers multiple inputs through active and passive monitoring, as well through the results of external engagement activities, particularly the Gender and Cultural Safety Advisory Committee (see Section 4.6) and through the processes made available to the workers to report incidents. Using this input, the Woodfibre LNG Project will evaluate the compliance of the implementation of the GCSP. For any identified non-conformances, Woodfibre LNG will evaluate potential corrective and preventative actions. The result of the assessment and responses will be summarized in reports.

### 6.2 Compliance Assessment

While the Floatel is in operation, Woodfibre LNG will conduct monitoring of compliance with the GCSP. Woodfibre LNG will include contractors in ongoing compliance monitoring as and when it relates to contractors' policies, practices, training or workers. Planned activities include:

- An annual internal review of GCSP implementation conducted by Woodfibre LNG that will be summarized and presented in the annual report.
- The gathering and review of relevant data as part of GCSP engagement activities.
- Regular tracking that the onboarding requirements are being met.
- Quarterly reviews of all incidents reported, including a review of the status of any investigation and outcomes/consequences.
- Quarterly reviews of the feedback that has been provided by Workers, and how Woodfibre LNG or contractors have addressed the feedback.
- Ongoing observation of culture at the Floatel and at the site.
- Reviewing McDermott's monthly reports and meeting with McDermott on a bi-monthly basis to review Woodfibre LNG's findings from the activities noted above.

## 6.3 Non-Compliance, Corrective and Preventative Actions

Woodfibre LNG is committed to learning from experience and incorporating that experience within a learning culture. Serious incidents and complaints will be investigated, and a corrective action plan developed when required, with recommendations for future prevention of similar outcomes developed.

### 6.3.1 Non-Compliance

Non-compliances will arise when there is a failure to develop and/or implement the requirements of the GCSP in the specified timeframe.

This can include, but is not limited to:

- Failures in following the mitigations in the GCSP;
- Significant miss of object, program offering, or service offering;
- Non-compliance with a regulation, law, policy, permit condition, a plan, etc; and
- Failure to report or comply with a regulator, agency or government body because of an incident.

If there is a non-compliance, the cause will be investigated. The level of investigation must be reasonable with respect to the level of potential risk. Serious incidents will always be investigated.

All non-compliances will be addressed through the process described below.

### 6.3.2 Corrective and Preventative Action

For any non-compliance, corrective actions that consider the identified causes for the incident will be developed and undertaken, which may include an action plan to correct the non-compliance. All non-compliances and corrective actions and/or action plans will be captured in a report and tracked by Woodfibre LNG. All corrective action plan reports will contain a recommendation(s) for maintaining compliance or preventing a recurrence of the event. Non-compliance incidents will be led internally by the Woodfibre LNG Compliance team with the appropriate teams and contractors, and potentially the BC EAO, Indigenous Groups, the Gender Safety Advisory Committee and other agencies if required. Corrective action plans will include:

- A discussion of the issue or event, the investigation and the identified items that require correction to prevent a recurrence, if available and possible.
- An identified action(s) to prevent the recurrence.
- A person(s) responsible for implementing the corrective action and monitoring its success; and
- A timeline for completion.

Corrective action plans will, at a minimum, be submitted to Woodfibre LNG for review and approval prior to initiation. The corrective action plan, and its progress, will be reported to the senior management committee.

## 6.4 Indigenous Groups Follow Up Monitoring

Sk̓wxwú7mesh Úxwumixw (Squamish Nation) conducts regular outreach and engagement with community members to identify adverse effects associated with community members pertaining to the use of community service and infrastructure, as well as cultural or contemporary land and resource use

practices. Through this process, Skwxwú7mesh Úxwumixw (Squamish Nation) community members may raise questions or concerns about gender and cultural safety. Woodfibre LNG will work with Skwxwú7mesh Úxwumixw (Squamish Nation) to ensure that any required information is made available to the Skwxwú7mesh Úxwumixw (Squamish Nation) and any issues or incidents raised are included in, and addressed through the mechanisms established through the GCSP, as appropriate.

Woodfibre LNG will support Skwxwú7mesh Úxwumixw (Squamish Nation) follow up monitoring by providing requested information, if available, to Skwxwú7mesh Úxwumixw (Squamish Nation), working with Skwxwú7mesh Úxwumixw (Squamish Nation) to address unforeseen adverse effects, and by incorporating relevant information into ongoing regulatory reporting with Skwxwú7mesh Úxwumixw (Squamish Nation), as agreed.

Woodfibre LNG will work with Tsleil-Waututh Nation to implement GCSP monitoring processes that effectively engages members and addresses any concerns.

## 6.5 Reporting

Woodfibre LNG will generate reports to provide information about the progress and effectiveness of the GCSP's mitigation measures. The following reports will be produced to support the construction, communication, and mitigation activities:

**Table 7: Planned GCSP Reports**

Report Cycle	Description
<b>Annual Report</b>	An annual report will be issued to summarize the results of GCSP implementation for the given year to provide information about the progress and effectiveness of the GCSP. Annual reporting will begin one year after the start of Floatel operations.
<b>Final Report</b>	A final report will be issued two years after the start of operations, or as requested by the BC EAO.

Reports will be distributed electronically to the BC EAO, Indigenous Groups, provincial and local governments, service providers and other interested parties. Hard copy reports will be made available upon request. Annual reports will be shared with the BC EAO to post on its website and will be posted on the Woodfibre LNG website.

Woodfibre LNG will also be providing the Gender Safety Advisory Committee with regular reports at its meetings. To the extent possible, while protecting confidentiality and anonymity, these reports include available information on the number of incidents reported as well as results of investigations and actions taken to address and further deter any forms of bullying, harassment, and discrimination as well as how WLNG has managed gender and cultural safety on the Project. As mentioned earlier in the Plan, Woodfibre LNG will respect and protect anonymity in the process of reporting on incidents and mitigations, and will only report information to the extent that it is possible to protect personal identifying characteristics of workers employed on the Project. As such, in some cases, detailed reporting of incidents, such as consequences imposed, may not be possible.

Reports will include available information on the behaviour indicators set out in section 4.14. In addition to those indicators, reports will include available information on the implementation status for:

- Workers reviewing and signing the Code of Conduct; and
- Workers receiving training at onboarding or orientation for:
  - Gender and Cultural Safety,
  - Violence and harassment prevention training, and
  - Addictions awareness training.

## 6.6 Adaptive Management and Continuous Improvement

As part of its management system, Woodfibre LNG commits to continuous improvement of its mitigation program to ensure gender and cultural safety on the Project and on the Floatel.

Woodfibre LNG senior management's support, direction and communication to all Project workers is critical to developing a strong culture of awareness and continual improvement. As part of the annual internal review of its Gender and Cultural Safety plan implementation, Woodfibre LNG will review the design of its programs and services and propose improvements using the principles of adaptive management when required to ensure there is a strong positive culture where everyone is valued and respected, and continual improvement is embraced as regular business.

Woodfibre LNG will use an adaptive management approach in its development and implementation of the GCSP. Adaptive management is a way in which the effectiveness of mitigation measures is evaluated based on monitoring results, and adjusted if required, to achieve desired objectives. The general adaptive management approach is an iterative process that includes problem assessment, planning, implementation of management actions, monitoring, evaluation, with the cycle repeating until the identified uncertainties are sufficiently reduced.

Woodfibre LNG will review the GCSP, including the programming set out in the GCSP, at least annually, using the process set out below. Minor changes to policies, initiatives or practices may be made throughout the year at Woodfibre LNG's and/or the contractors' discretion, and will be provided to the EAO for review and approval prior to implementing such changes. Minor changes include changes such as making clarifications or corrections, or to improve accessibility of the information or process, but do not include changes to the substance of the policy, initiative or practice. Any change to the GCSP deemed by the EAO to be material will require consultation, engagement and/or discussions with Indigenous Groups, the Gender Safety Advisory Committee and other stakeholders, before changes are finalized and implemented. Post-consultation, material changes to the GCSP will be provided to the EAO for review and approval and will be implemented throughout the operations of the Floatel under the direction of the Qualified Person and to the satisfaction of the EAO.

The six main steps in the adaptive management process are: (1) plan development, (2) implement mitigation measures, (3) monitor mitigation effectiveness, (4) report on mitigation outcomes, (5) assess mitigation outcomes and (6) adjust mitigation measures, if required.

A summary of these steps are as follows:

- **Step 1 (Plan Development):** The Plan (GCSP in this case) provides the framework for implementation, monitoring, and reporting of mitigation measures. The Plan identifies required measures, metrics, Project teams and external participants in monitoring.

- **Step 2 (Implementation):** The measures identified in the Plan will be implemented by Woodfibre LNG and McDermott and includes all contractors and subcontractors.
- **Step 3 (Effectiveness Monitoring):** Reporting metrics will be tracked by Woodfibre LNG that are received from McDermott and will be sent to Woodfibre LNG monthly. Woodfibre LNG will also receive other information gathered through reporting mechanisms established through the Plan, such as the confidential reporting line. External parties can also inform Woodfibre LNG through the feedback email ([info@wlng.ca](mailto:info@wlng.ca)) or through ongoing engagement with workers and the community.
- **Step 4 (Reporting):** Woodfibre LNG will compile reporting information provided by McDermott, various reporting mechanisms and external parties and share this information with the Gender and Cultural Safety Advisory Committee and seek the Committee's advice and recommendations.
- **Step 5 (Evaluate):** Woodfibre LNG will present and review the monitoring results and the advice and recommendations of the Gender and Safety Advisory Committee and evaluate the effectiveness of the mitigation program annually. Based on this review, recommendations for changes to the measures will be considered. The Committee's recommendations regarding the mitigation program, and Woodfibre LNG's response to or adoption of these recommendations, will be recorded by meeting minutes, in the same way as other regular Committee meetings, as described in section 4.5.1.
- **Step 6 (Adjust):** Woodfibre LNG will make changes to measures and monitoring metrics, working with McDermott and other contractors, to ensure that plan objectives are achieved.

A document history table listing version, date, and distribution is included at the beginning of the GCSP.

While adaptive management will be a continual process, needed updates to policies, initiatives or practices that are identified before the annual review and are time-sensitive, or necessary to address major issues will not wait for the annual update (for example if there are there appears to be challenges with reporting mechanisms). In such cases, the adaptive management process steps will be followed, but in a timeframe more suited to the issue at hand. Given the planned regular engagement with the Gender and Cultural Safety Advisory Committee, there will be an established process in place for ensuring that these issues can be addressed in a timely manner, and with adequate Indigenous and stakeholder review and engagement.

Woodfibre LNG, and its contractors and sub-contractors, are committed to ensuring gender and cultural safety through a proactive adaptive management approach with the advice and input from the Gender and Cultural Safety Advisory Committee. Feedback will be captured by the Secretariat in meeting minutes and action logs, as described in Section 4.5.1. Supplemental records of engagement will be kept by the company and provided to regulatory bodies as requested.

## 7. Qualified Person(s)

While Woodfibre LNG initiated the development and implementation of gender and cultural safety training described in this document, in collaboration with Indigenous Groups, the company has contracted qualified person(s) with relevant training, experience and expertise on ensuring worker health and safety, including gender and cultural safety, on major industrial projects, as required by Condition 26.1 of EAC Amendment #3 to Certificate #15-02.

Woodfibre LNG will ensure that the Plan, and any updates to it, will remain under the direction of the qualified person(s), throughout the operations of the Floatel – as required by Condition 26.4.

Prepared by:

A handwritten signature in black ink, appearing to read 'CM Reid', with a long horizontal flourish extending to the right.

CM Reid  
Human Resources Professional  
Principal, Salish Human Resources

## 8. Appendices

**The following are appended to the Plan as separate documents:**

Appendix 1: Table of Concordance with EAC Conditions

Appendix 2: Summary of Woodfibre LNG Initiatives in Response to the National Inquiry into MMIWG

Appendix 3: Draft Record of Engagement

Appendix 4: Map of Initiatives / Actions and Plan Sections to Plan Objectives

Appendix 5: Worker Code of Conduct

Appendix 6: Gender Safety Advisory Committee Terms of Reference

Appendix 7: Gender and Cultural Safety Training Materials