



GLOOSCAP VENTURES

Spirit of the Wolf

Health and Safety Program

SECTION 1

Policy Statements

Section	1 — Policy Statements
Version	01
Effective Date	31 August 2026
Policy Owner	H&S Manager
Approved By	Michael Peters, Chief Executive Officer
Next Review	31 August 2027
Statements	1.01 to 1.08 (eight policy statements)

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SECTION 1

Contents

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The policy statements below set out the commitments that govern the Health and Safety Program. Each statement is issued as a separate controlled document, is approved by the Chief Executive Officer, and is reproduced here in full.

The cultural policy statements are placed first. They establish the values that the regulatory commitments that follow are built on.

NO.	POLICY STATEMENT	PAGE
	About the Program	3
1.01	Netukulimk Policy Statement	4
1.02	Seven Sacred Teachings Policy Statement	6
1.03	Occupational Health and Safety Policy Statement	7
1.04	Compliance Assurance Policy Statement	8
1.05	Environmental Policy Statement	9
1.06	Psychological Health and Safety Policy Statement	10
1.07	Workplace Violence Prevention Policy Statement	11
1.08	Respectful Workplace Policy Statement	12
	Revision History	13



SECTION 1

About the Program

Spirit of the Wolf is the health and safety program of Glooscap Ventures, developed and maintained by Glooscap Health and Safety. It is a modular, Indigenous-informed safety program built around the teachings that open this section. The program began in the 2021/2022 fiscal year with support from the First Nations and Inuit Health Branch, focused on workplace health and safety for Indigenous Health Centres in Atlantic Canada, and has since been extended across the Glooscap Ventures business and non-business entities.

WHAT THIS SECTION IS, AND IS NOT

This section contains the policy statements only. They set out what the organization commits to, who is accountable, and the standard every workplace is held to. They are approved by the Chief Executive Officer and are intended to be posted and shared openly.

The Spirit of the Wolf program sits behind these statements and carries the detail that gives each commitment effect:

- Hazard identification, risk assessment and control
- Safe work practices and written procedures
- Workplace inspections and equipment checks
- Incident reporting, investigation and corrective action
- Emergency preparedness and response
- Training, certification and competency records
- Audit tools and program evaluation

The program, together with its procedures, forms, records and audit tools, is maintained internally and is not published. Anyone who needs the working detail behind a statement should contact the H&S Manager.

In short: the statements say what we commit to. The program says how it is done.



POL 1.01

Netukulimk Policy Statement

Embracing Netukulimk and Self-Governance

Document No.	POL 1.01	Version	01
Section	1 — Policy Statements	Status	Approved
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Glooscap Ventures is deeply committed to the principles of Netukulimk and the path of self-governance. Netukulimk, a revered Mi'kmaw concept, emphasizes the balance and harmony between our needs and the natural world. It teaches us to take only what we require, ensuring resources for future generations. This principle, combined with our dedication to self-governance, forms the foundation of our Health and Safety Program.

- **Self-Governance and Safety:** As a self-governing entity, we prioritize the safety and well-being of our community members. Our safety standards, while recognizing provincial and federal guidelines, are crafted to reflect our unique values, traditions, and the teachings of Netukulimk.
- **Sustainable Practices:** Drawing from the wisdom of Netukulimk, we adopt sustainable safety practices that protect our employees and respect the environment, ensuring resources for future generations.
- **Harmony with Nature:** Our safety measures are designed in harmony with nature. We believe that a thriving environment contributes to the holistic well-being and safety of our community.
- **Community-Centric Governance:** Our self-governance model emphasizes community involvement. We actively engage our community members in shaping and reviewing our safety protocols, ensuring they resonate with our collective wisdom and values.
- **Integration of Traditional Knowledge:** Our commitment to self-governance and Netukulimk means valuing and integrating traditional knowledge with contemporary safety practices, creating a comprehensive and holistic safety program.
- **Respect for All:** In the spirit of Netukulimk, we respect all life forms. Our safety practices are designed to prevent harm to other beings and the environment.
- **Future-Oriented Governance:** Our approach to safety is forward-thinking, ensuring our actions today pave the way for a safe and sustainable environment for future generations.
- **Accountability and Transparency:** True to our self-governance model and the teachings of Netukulimk, we maintain transparency in our actions and hold ourselves accountable. Our safety practices undergo regular reviews, ensuring continuous improvement and alignment with our values.

By intertwining the principle of Netukulimk with our commitment to self-governance, our Health and Safety Program goes beyond immediate protection. It is deeply rooted in values that resonate with the traditions and beliefs of the Glooscap First Nation. This approach ensures the physical, emotional, and spiritual well-being of our community, honouring our bond with the land and our dedication to future generations.



APPROVAL

Michael Peters, Chief Executive Officer

31 August 2026

Date



POL 1.02

Seven Sacred Teachings Policy Statement

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The Health and Safety Program of Glooscap Ventures is deeply rooted in the principles of the Seven Sacred Teachings. These teachings, which encompass Love, Respect, Courage, Honesty, Wisdom, Humility, and Truth, guide our approach to ensuring the well-being and safety of all members of our community.

- **Love:** Our commitment to the safety and well-being of our employees stems from a place of genuine care and love. We believe that every individual deserves to work in an environment where they feel valued and protected.
- **Respect:** We respect the rights of every individual to a safe and healthy workplace. This respect extends to the environment, ensuring that our operations do not harm the land that sustains us.
- **Courage:** We have the courage to address any health and safety concerns head-on, ensuring that potential hazards are identified and mitigated promptly.
- **Honesty:** Transparency and honesty are at the core of our Health and Safety Program. We believe in open communication, ensuring that all employees are informed about safety protocols and are encouraged to voice any concerns.
- **Wisdom:** We continuously seek knowledge and understanding about best practices in health and safety. By drawing on the collective wisdom of our community and experts in the field, we ensure that our program is always evolving and improving.
- **Humility:** We recognize that we do not have all the answers and are always open to feedback and suggestions. By approaching health and safety with humility, we ensure that our program is inclusive and considers the diverse needs of our community.
- **Truth:** Our commitment to truth ensures that we remain accountable in all our actions. We regularly review and assess our Health and Safety Program to ensure that it aligns with our core values and the truth of our commitment to the well-being of our employees.

By integrating the Seven Sacred Teachings into our Health and Safety Program, we ensure that our actions are not just about compliance but are deeply rooted in values that resonate with the traditions and beliefs of the Glooscap First Nation. These teachings guide us in creating a holistic approach to health and safety, ensuring physical, emotional, and spiritual well-being for all.

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Michael Peters, Chief Executive Officer

31 August 2026

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POL 1.03

Occupational Health and Safety Policy Statement

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Glooscap Ventures is committed to a strong safety culture that supports the protection of its employees, its property, the environment, and the public from incident when performing service provisions. Management is committed to continuous improvement toward a healthy and safe workplace through effective administration, education, and training.

Employees at every level, including management, are responsible and accountable for the organization's overall safety initiatives. Everyone must be involved in the hazard assessment, identification, and control programs to reduce the risk of injuries through a positive safety culture based on prevention. Complete and active participation by everyone, every day, in every job is necessary for the safety excellence Glooscap Ventures expects.

Supervisors will be responsible for the health and safety of workers under their supervision. Management and supervisors must ensure that information, equipment, and materials are provided to support each worker to work in compliance with established safe work practices and procedures for the work performed. Workers must receive adequate training in their specific work tasks to protect their health and safety. Management is committed to promoting a positive culture for a safe and healthy workplace free from threats, threatening behaviour, acts of violence, or harassment of any form.

All managers, supervisors, employees, and service providers must protect their own and their fellow employees' health and safety by working in compliance with the applicable occupational health and safety legislation and all applicable regulations, standards, and safe work practices and procedures established by Glooscap Ventures.

Our philosophy is that the well-being of our community, our organization, and our customers is dependent on the health and safety of all persons as part of the Internal Responsibility System. We will strive to take every precaution reasonable in all circumstances for the protection of ourselves, people, property, and the environment.

As an injury-free, incident-free, and healthy workplace is our goal, your attitude and cooperation are appreciated in promoting a healthy and safe workplace and controlling hazards. Through continuous safety and prevention efforts, we can accomplish this.

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Michael Peters, Chief Executive Officer

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POL 1.04

Compliance Assurance Policy Statement

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The leadership of Glooscap Ventures confirms that Assurance of Compliance will be our first level of safety commitment. This is the employer's written policy statement of commitment to regulatory health and safety requirements and to confirmation of compliance with health and safety obligations for Glooscap Ventures and its employees. It is the policy of Glooscap Ventures to ensure that the health and safety of all employees are always safeguarded.

We understand that federal and provincial health and safety officers conduct workplace inspections, respond to employee complaints, and investigate accidents. These officers may enter any workplace, at any reasonable time, to conduct an inspection or investigation. An officer will typically request that a health and safety committee member or representative be present during the inspection.

Employers and employees are required to always co-operate with the officer and provide the necessary assistance during and after the inspection.

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Michael Peters, Chief Executive Officer

31 August 2026

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POL 1.05

Environmental Policy Statement

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The leadership of Glooscap Ventures, and all employees, are committed to ensuring that all possible safeguards are taken to protect our environment when performing workplace activities, and to comply with all applicable federal, provincial, and local environmental acts and regulations.

Management and supervisors will be responsible and accountable to educate all employees on environmental issues and procedures that involve the work being conducted and the services offered, including prevention and emergency procedures pertaining to an environmental spill or incident.

Glooscap Ventures supports the minimization of pollution and, where practical, will take all reasonable precautions to reduce the release of pollutants to the air, water, and land.

Glooscap Ventures will strive to use energy and natural resources in an efficient and cost-effective manner and will follow the five R's in their order of importance from refuse, reduce, reuse, repurpose, and recycle materials whenever practicable; and will ensure the disposal of materials in the proper manner at disposal facilities in accordance with the Environment Act and regulations.

Management recognizes that achievement of its objectives is made possible through the education, involvement, and support of all employees, and will ensure active and effective participation through the provision of appropriate training programs.

Glooscap Ventures will continuously seek opportunities to improve our adherence to these principles and will report environmental issues to management and other stakeholders. Glooscap Ventures recognizes the importance of an effective Environmental Policy and effective environmental management to ensure that its legal and community requirements are met.

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Michael Peters, Chief Executive Officer

31 August 2026

Date



POL 1.06

Psychological Health and Safety Policy Statement

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Glooscap Ventures recognizes the importance of psychological health and safety in the workplace and is committed to promoting a positive working environment that actively works to prevent harm to a worker's psychological health, whether caused in a negligent, reckless, or intentional manner, and that promotes psychological well-being.

Psychological safety is the absence of harm, and of the threat of harm, to well-being that a worker may experience.

Psychological health and safety are embedded in the way people interact with one another daily and are part of the way working conditions and management practices are structured and the way decisions are made and communicated.

The leadership of Glooscap Ventures shall collaborate with all employees to identify and eliminate hazards in the workplace that pose a risk of psychological harm to a worker. They will assess and control the risks in the workplace associated with hazards that cannot be eliminated (for example, normal stressors that are inherent in work or in organizational change) and implement structures and practices that support psychological health and safety in the workplace.

Glooscap Ventures recognizes that human needs related to basic psychological and security needs must first be identified and controlled in order that factors related to higher-level human needs can be satisfied. Although numerous factors play a role in an individual's psychological make-up, the workplace plays a large part in daily life and is therefore a vital component.

Management commits to working in a positive, non-judgmental, and unbiased manner with all employees, as a shared responsibility with the individual, to assist with any psychological need that has been identified by either the individual or management.

Through a lens of continual improvement, everyone shall work together to foster a culture that promotes psychological health and safety in the workplace.

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Michael Peters, Chief Executive Officer

31 August 2026

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POL 1.07

Workplace Violence Prevention Policy Statement

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The Glooscap Ventures workplace violence prevention statement was created, in accordance with the Regulations, to demonstrate Glooscap Ventures's commitment to providing a healthy and safe workplace in which the threat of violence is minimized.

We recognize that any form of violence causing physical harm is an occupational health and safety hazard and is unacceptable in the workplace. Through employee awareness, education, and training, Glooscap Ventures is committed to minimizing or, to the extent possible, eliminating the risk of violence.

When a new violence risk assessment indicates a significant change to the extent and nature of the risk of violence, the plan shall be reviewed and, if necessary, revised. At a minimum of every three (3) years, the violence prevention plan shall be reviewed and, as necessary, revised.

We view acts of violence or threats of violence in the workplace as unacceptable. We are committed to working to prevent workplace violence and to responding appropriately if workplace violence does occur.

This policy applies to all employees, suppliers, contractors, clients, and members of the public who are associated with Glooscap Ventures.

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Michael Peters, Chief Executive Officer

31 August 2026

Date



POL 1.08

Respectful Workplace Policy Statement

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Glooscap Ventures is committed to providing a collaborative working environment in which all individuals are treated with respect and dignity. It is further recognized that every individual has a right to work in an environment that is free from workplace bullying. Workplace bullying harms, intimidates, offends, degrades, or humiliates an employee and is not acceptable.

Glooscap Ventures is committed to creating a workplace in which domestic violence will not be tolerated, nor excused. The purpose of this policy is to create awareness of domestic violence and its effect on the workplace. It also provides guidance for all employees when dealing with situations of domestic violence, either directly or indirectly.

This policy applies to all members of Glooscap Ventures, including but not limited to employees, clients, volunteers, visitors, contractors, and employees of other organizations who work on or are invited onto the property. All members of Glooscap Ventures are accountable for complying with this policy and maintaining a respectful environment. Work premises extend to any place where work or work-related duties or functions are performed, including work by means of telephone and written or electronic communication. Activities such as excursions are considered part of the workplace, as are conferences and training.

Procedures have been developed to ensure that workplace disputes attributed to workplace bullying or domestic violence in any form are dealt with quickly. These procedures supplement the Glooscap Ventures philosophy of a respectful workplace and its obligations under the Nova Scotia Occupational Health and Safety Act and will be applied with due care and attention to the process and the individuals involved.

Where allegations relate to discrimination on the basis of a ground prohibited by the Nova Scotia Human Rights Act (age; race; colour; religion; creed; sex; sexual orientation; gender identity; gender expression; physical disability or mental disability; an irrational fear of contracting an illness or disease; ethnic, national or aboriginal origin; family status; marital status; source of income; political belief, affiliation or activity), the allegations will be investigated as outlined in this policy.

APPROVAL

Michael Peters, Chief Executive Officer

31 August 2026

Date



SECTION 1

Revision History

This table records the revision history for Section 1 and for the Spirit of the Wolf program that supports it. Each statement carries the version and effective date shown in its own document control block.

Version	Date	Description of Change	Approved By
—	2021	Spirit of the Wolf Health and Safety Policy and Procedure developed by Glooscap Health and Safety, with support from the First Nations and Inuit Health Branch.	
00	2024	Health and Safety policy statements approved.	
01	31 August 2026	Full review and reissue. Statements renumbered with the cultural policy statements placed first. Content corrected and standardized. Document control, approval and review cycle added.	Michael Peters, Chief Executive Officer