Denison Mines Corp.
Wheeler River Operation

Health and Safety Management Program

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Version 2

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Approval for Use

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1	26-Sept-2023	For CNSC Review			
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Revision History

Version	Date	Description of Revision
1	26-Sept-2023	For CNSC Review
2	13-March-2025	1.3 Safety Culture – *revised wording, added reference.* 1.5 Compliance with Regulatory Requirements – *corrected reference.* 2.9 Emergency Management – *added detail.* 3.1.4.4 Procedures – *added detail.* 3.1.7 GHS/WHMIS – *added section.* 3.1.7 Return to Work – *added section.*

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1 Introduction

The *Health and Safety Management Program* (the Program) is one of the Program documents that comprise the Management System for the Wheeler River Operation (the Operation). The *Health and Safety Management Program* is preceded by the *Management System Program* within the document framework for the Operation as shown in Figure 1. Consistent with all other Program documents, the *Health and Safety Management Program* is organized according to the 'Plan-Do-Check-Act' iterative process to incorporate continual improvement in all stages of the Program.

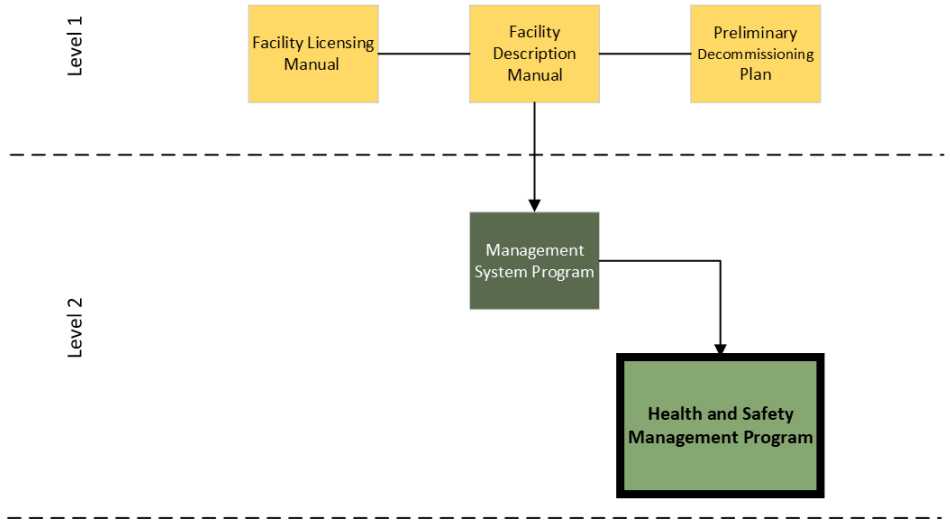

Figure 1: Program shown within Document Framework for the Wheeler River Operation

1.1 Purpose

This Program defines the requirements, processes, principles, and framework used to promote the health and safety of workers and a strong safety culture for the Operation. The Program is a management tool that is used to integrate Denison's health and safety measures and processes into a documented, managed, and auditable process.

The Program utilizes a risk-based, systematic approach to managing risk and occupational health and safety hazards at the Operation.

1.2 Scope

The Program is established to ensure compliance with regulations and company policy and principles for establishing safe work practices at the Operation.

Occupational health risks arising from ionizing radiation fall within the scope of the *Radiation Protection Program*. To protect overall worker health, this Program and the *Radiation Protection Program* operate in concert, wherever practicable.

1.3 Safety Culture

Denison is committed to building a strong health and safety culture that empowers workers to be health and safety promoters at the Operation. Assessments of the culture provide feedback and contribute data to safety key performance indicators (KPIs) and safety audit results. Safety culture shall be influenced as described in the *Management System Program* including utilizing strong leadership at all levels of the organization. Leaders will improve current safety climate utilizing *DMC-HS-164-Field Leadership* which over time will positively affect safety culture.

Additionally, the safety culture:

- Encourages and values worker and contractor input during daily, weekly, and monthly safety discussions;
- Fosters and promotes proactive prevention of workplace incidents utilizing leading indicator reporting of hazardous conditions and near misses; and
- Supports continual improvement by meeting cross functionally with various levels of leadership.

1.4 Program Principles and Denison's Environment, Health, Safety & Sustainability Policy

Denison recognizes the importance of worker health and safety to achieve Operation outcomes of safety and reliability, while fostering the approach to preventing workplace injury, illness, and disease.

Denison's commitment to health and safety is communicated in its corporate *Environment, Health, Safety, and Sustainability Policy*, applicable to all its facilities. The *Health and Safety Management Program* is based on the principles outlined in that policy and can be found in the *Management System Program*.

1.5 Compliance with Regulatory Requirements

This Program is compliant with the *Nuclear Safety and Control Act (SC 1997, c.9)* and associated regulations, including the *General Nuclear Safety and Control Regulations (SOR/2000-202), The Uranium Mines and Mills Regulations (SOR2000-206).* The Program also follows guidance and requirements in the Canadian Nuclear Safety Commission (CNSC) REGDOC 2.1.2, *Safety Culture,* and REGDOC 2.8.1 *Conventional Health and Safety.*

Additionally, the Program meets provincial requirements including *The Saskatchewan Employment Act, S-15.1,* and the *Occupational Health and Safety Regulations, 2020.*

1.6 Terminology

1.6.1 Definitions

Term	Definition
As low as reasonably achievable (ALARA)	A principle of radiation protection that holds that exposures to radiation are kept as low as reasonably achievable, social, and economic factors taken into account.
Field level hazard assessment (FLHA)	A process of hazard identification and control (mitigation) in work planning conducted by all workers involved in performing a task. An FLHA is conducted in the field.

Job hazard analysis (JHA)	A hazard identification and control process used to describe each task of a job, the associated hazards, and controls required to mitigate the risk of each hazard and keep workplace exposures to hazards ALARA.
Key performance indicator (KPI)	A quantifiable measure used to evaluate the success of a process or organization in meeting performance objectives. A KPI must be consistently measurable, comparable to a target, and display change over time (i.e., trending).
Licensed activities	Operation activities within the scope of Canadian Nuclear Safety Commission (CNSC) licensing. Operation site-based activities that may be outside the scope of CNSC licensed conditions are subject to the integrated management system on a risk-informed basis (i.e., where the consequence of human error poses a risk to the environment, the health and safety of people, or to the security of Operation facilities).
Personal protective equipment (PPE)	Includes equipment an individual must use to minimize hazards associated with doing a particular task. This includes safety glasses, gloves, hard hats, safety boots/shoes, coveralls, respirators, harnesses, etc.
Prime contractor	Contractor, under contract directly with Denison, who is responsible for the completion of a defined project and who directs the work of multiple sub-contractors to do the same.
Safe work practice	A governing document outlining the foundation for the safe execution of a specific type of work or job by providing a mandatory set of minimum standards for the work to be done. Safe work practices are commonly referred to as the "Do's and Don'ts" around a job.
Work instruction	A document that sets out the sequential steps for completing a particular task in a safe manner.
Worker	Any person working for Denison, including contractors.

1.6.2 Acronyms and Abbreviations

Acronym or Abbreviation	Term
ALARA	as low as reasonably achievable
FLHA	field level hazard assessment
JHA	job hazard analysis
KPI	key performance indicator
PPE	personal protective equipment

2 Plan

2.1 Risk Management

Risk management identifies, assesses, and controls risks to workers, the environment, systems, facilities, and equipment associated with a task or process. The operation adopts a consistent and integrated approach to risk management to identify, manage, and mitigate risk.

This process includes identifying health and safety hazards that can affect workers, the environment, or the public, determining the significance of any associated risks, and mitigating the risks to acceptable levels by applying controls.

2.1.1 Hazard Identification

Health and safety hazards are conditions or agents that can potentially cause harm in the form of physical injury, illness, or disease from differing work environments, conditions, circumstances, or the characteristics of physical, chemical, biological, or psychosocial agents.

Hazards are identified using appropriate types of assessment which are documented and tracked. Typical assessments include job hazard analyses (JHAs) and field level hazard assessments (FLHAs).

Procedures or processes involving identification and control of ionizing radiation are discussed in the *Radiation Protection Program*.

2.1.2 Hazard and Risk Assessment

Hazards are initially assessed using tools including JHAs and job observations. Once controls are in place for the known hazards, an FLHA is used to identify daily changes in conditions and assess hazards specific to the work location.

Risks to worker health and safety are assessed considering:

- Potential injury;
- Potential health exposure;
- The severity and frequency of exposure;
- Duration of exposure to the hazard; and
- Workers potentially at risk.

Risk matrices for the type of assessment performed are used to correlate the frequency, duration, and severity of each health and safety risk.

Results of the risk assessment process are used to identify and develop appropriate controls to mitigate risks to acceptable levels.

2.1.3 Risk Register

Denison uses a risk register to proactively identify and address significant health and safety aspects, prioritize resources, and continuously improve its health and safety practices. The risk register is a central repository for recording and tracking information related to the significant health and safety aspects.

The risk register can include information such as: risk identification, risk assessment, risk analysis, risk evaluation, risk prioritization, risk mitigation, risk monitoring and review. Further details on the risk register are provided in the *Management System Program*.

2.2 Objectives and Targets

Objectives and targets of this Program will be measurable, documented, and tracked. Performance against the objectives and targets will be communicated at regular intervals (i.e., during Management Review), and opportunities for continual improvement will be identified.

Health and safety and Safety Culture objectives and targets can better control existing significant risks and continual improvement of current practices. These objectives and targets are tracked using KPIs.

The process for setting overall objectives and targets is outlined in the *Management System Program* and supporting procedure.

2.3 Resources

Denison is committed to providing the necessary resources to support effective development, implementation, maintenance, and continual improvement of the Program, including achievement of its objectives and to encourage and grow an acceptable and strong health and safety culture.

2.3.1 Roles and Responsibilities

This subsection outlines the specific roles and responsibilities within the Program, including Site Management, Health and Safety Management, Site Supervision, Site Workers, and Occupational Health and Safety Committee, and other workers with various levels of responsibility.

For effective implementation of this Program, workers are informed of their roles and responsibilities and are accountable for comprehending and performing them. Executive and Leadership level roles and responsibilities are included in the *Management System Program*.

<u>Site Management</u>

- Promoting an environment that safety is a main consideration influencing decisions and actions at all levels of the Operation;
- Approving annual Program objectives and targets;
- The integration of Program requirements into various processes and phases of the Operation;
- Ensuring the effectiveness of this Program;
- Communicating the importance of effective management and of conforming to Program requirements;
- Allocating adequate and appropriate resources to fulfill Program implementation;
- Developing proper documentation and tools to implement this Program effectively;
- Controlling health and safety incidents and deviations and directing corrective action when required;
- Participating in the management review process;
- Ensuring oversight of processes with inspection and auditing activities; and
- Identifying, developing, and taking opportunities for continual improvement.

Health and Safety Management

- Overseeing development, implementation, and compliance to this Program;
- Communicating with the applicable regulatory agencies (e.g., CNSC, LRWS) on behalf of the Operation;
- Setting objectives and targets, monitor performance, and prepare internal and external reports regarding activities and outcomes of the Program;
- Managing resources confirming legal compliance with regulatory needs and standards, and conformance with Program requirements;
- Confirming workers have the training, and awareness of health and safety to perform their duties;
- Audit worker competency as determined by site supervision;
- Working with all departments to confirm those with specific responsibilities are qualified to fulfill their roles within the Program;
- Communicating with external stakeholders, if needed;
- Providing oversight through inspections, audits, and monitoring;
- Reporting to management on functioning and effectiveness of the Program;
- Facilitating management review of the Program; and
- Evaluating the Program to promote, identify, and support continual improvement.

Site Supervision

- Understanding and following the requirements of this program;
- Supporting objectives and targets;
- Demonstrating and promoting attitudes where safety is a main consideration at all levels of the Operation;
- Oversee their departmental functions and verify conformance to program requirements by their crew members;
- Conforming to program procedures and training needs;
- Supporting crew members in planning work activities to eliminate or mitigate health and safety risks;
- Participating in training workers to perform a task or carry out a duty while under close and competent supervision during their training;
- Assigning competent workers to perform work;
- Participating in inspections, investigations, and audits;
- Communicating and coordinating with other department workers, where activities can interconnect, to facilitate effective implementation of this Program;
- Communicating with and direct contractors, as necessary;
- Identifying and supporting scenarios for continual improvement; and
- Participating in management reviews, when required.

Site Workers

- Developing and demonstrating a positive health and safety culture/attitude;
- Understanding and following all health and safety processes and procedures;

- Recognizing, identifying, and promptly communicating any occupational health and safety hazards;
- Working towards fulfilling objectives and targets in their areas of responsibility;
- Adhering to applicable use, care, and maintenance procedures for occupational injury and exposure controls;
- Using equipment, devices, facilities intended for protecting their health and safety as outlined in procedures and training programs;
- Adhering to processes established to protect workers and promote health and safety;
- Co-operating with investigators, inspectors, auditors, and regulators;
- Taking all reasonable precautions to maintain the health and safety of themselves and other workers, including stopping and refusing any work deemed to be unsafe;
- Participating in risk assessment processes for health and safety hazards, including various occupational exposure monitoring programs; and
- Identifying and communicating opportunities for improvement to prevent injury, illness, and disease to themselves or other workers.

Occupational Health Committee

- Representing the workforce by contributing to this Program's development, improvement, and implementation including, but not limited to, hazard identification, risk assessment, and controls activation;
- Promoting a positive health and safety culture;
- Participating in incident investigations, as per regulatory requirements;
- Communicating health and safety concerns to support general awareness of hazards and the mitigation of associated risks; and
- Partnering with health and safety workers to prevent and minimize occupational injury, illness, and disease.

2.3.2 Facilities and Equipment

Facilities and equipment to support the effective implementation of the Program and its related practices are provided to Program staff and applicable workers. Facilities are designed, constructed, operated, and maintained with consideration for worker health, safety, wellbeing, and compliance with legal requirements. Physical infrastructure (e.g., change rooms, laundry), preparation and storage areas (e.g., PPE cleaning and storage areas), and equipment that supports Program implementation and its associated processes are provided to workers.

The Operation provides required fixed and portable equipment and personal protective equipment (PPE) to prevent, eliminate, or reduce occupational injury, illness, and diseases, including:

- Guards, fences, and interlocks;
- Ventilation systems;
- Fire prevention and suppression systems;
- Area and personal gas monitoring systems;
- Airborne dust monitoring and suppression systems; and
- Relevant PPE.

Equipment and buildings meet relevant provincial and federal health and safety standards, codes, and regulations.

The Operation provides monitoring equipment to collect samples and analyze data on physical, chemical, and biological hazards. Monitoring equipment is operated, calibrated, and maintained by qualified workers according to manufacturer instructions and specifications.

2.4 Legal and Other Requirements

Denison is committed to complying with all applicable legal and other requirements related to health and safety management. Types of legal requirements applicable to the Operation include:

- Federal and provincial acts and regulations;
- Environmental assessment commitments and follow-up monitoring; and
- Licensing obligations and commitments.

The process for managing legal and other requirements is outlined in the *Management System Program*. Denison has established procedures to ensure compliance with these requirements and that compliance obligations are regularly reviewed. Any changes relevant to health and safety compliance obligations are monitored and evaluated to determine if updates to the *Health and Safety Management Program* and its supporting Plans, Procedures, and Work Instructions are required.

2.5 Training and Competence

A systematic approach to training (SAT) is used to educate, train, and qualify workers and contractors to perform assigned work. Training requirements are monitored to verify workers have necessary training when needed to maintain competency and work safely. Program-specific training requirements are defined in the *Training Management Program*.

Records of training activities and competencies will be maintained as outlined in the *Training Management Program*.

Workers and visitors must participate in site orientation. This orientation includes the health and safety policy, introduces applicable procedures, information on camp policies, and personal conduct expectations while at the site.

As per Part 5 of Occupational Health and Safety Regulations, 2020 personnel will be trained to meet the requirements set out in Table 9 *Summary of First Aid Personnel Requirements*. First aid kits will meet CSA Z1220-17, *First aid kits for the workplace*. A first aid register will be maintained accordingly.

2.6 Documentation and Records Management

Denison will establish and maintain documented plans, procedures, and work instructions to ensure effective implementation of the Program. Documentation will be controlled, reviewed, and updated as necessary in accordance with the requirements in the *Management System Program*.

Documents and records will be generated as a result of implementation of the Program and completion of licensed activities. Examples of some records generated specific to the Program can include:

- Health and safety plans, procedures, and work instructions;
- Safe work practices;
- Health and safety related and records (e.g., completed inspection forms, work permits, occupational health exposure monitoring data).

Documents and records are readily accessible to those who require them. Occupational exposure and

health records are managed in accordance with applicable privacy legislation. Further information on documentation and records management is provided in the *Management System Program.*

2.7 Communication

Communication both with internal and external stakeholders is a critical element of the Program to promote a strong safety work culture. Information to update workers on safety issues can include, but are not limited to:

- Safety moments included in meetings and training courses;
- Safety-focused toolbox meetings;
- Monthly safety meetings;
- Health and safety information boards;
- Workplace health and safety posters;
- Graphs and charts displaying KPIs and safety statistics;
- Incident debriefings including corrective actions; and
- Town hall meetings.

Workers are informed of their duties and responsibilities in health and safety, any process changes, infrastructure changes, equipment changes, and worker changes that can affect them.

Internal and external communication principles and processes are further outlined in Denison's *Management System Program*. Avenues of internal communication will be established within the Health and Safety Department to ensure that the flow of information from the field and laboratories reaches those in supervisor or management roles and vice versa.

Communication with indigenous communities, local communities, and the public is managed as outlined in the *Public and Indigenous Information Program*.

2.8 Change Management

Change is managed at the Operation to protect workers, the environment, and property, and to ensure that regulatory requirements are met. The Operation's change management process is outlined in the *Management System Program.*

Examples of changes captured by the process can include, but is not limited to changes to the:

- *Health and Safety Management Program* and supporting plans, procedures, and work instructions;
- Structures, systems, and components;
- Health and safety related regulatory requirements;
- Emerging operational risks; and
- Organizational changes.

2.9 Emergency Preparedness and Response

Denison is committed to establishing, implementing, and maintaining a process to prepare for and respond to potential emergency situations.

Emergency preparedness and response for the Operation is within the scope of the *Emergency Preparedness and Response Program*. The Operation is committed to preparing for emergencies and having effective response measures in place to minimize potential impacts on worker health and safety during an emergency event.

Significant medical events that occur will involve adherence to the *Emergency Preparedness Response Program*. *Occupational Health and Safety Regulations, 2020* will be followed to determine the first aid personnel requirements based on a workplace first aid risk assessment and number of workers at the place of employment.

3 Do

3.1 Health and Safety Management and Risk Control

This Program provides guidance and direction on key controls required to maintain a safe and healthy work environment for workers and contractors involved in work activities at the Operation.

Controls identified during risk assessments are used to eliminate, prevent, or reduce the risk of injury, illness, or disease to workers. Controls corresponding to the level of risk are selected and implemented with consideration for the hierarchy of controls as illustrated in Figure 2. Examples of controls include guards, signage, equipment, processes, products, safe work practices, and PPE.

Where practicable and advisable, controls are used in combination to prevent or reduce risk to workers. Controls are used, operated, and maintained according to their design, limitations, training, and documentation.

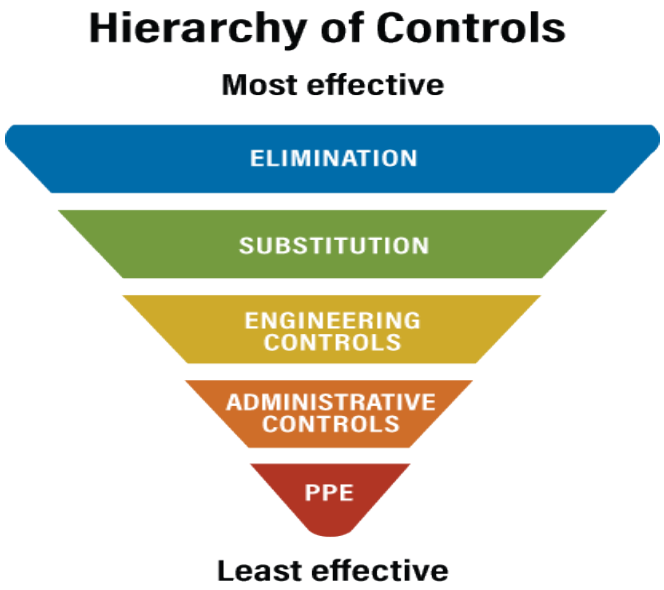

Figure 2: Hierarchy of Controls

3.1.1 Elimination

Wherever possible, hazards must be removed completely (e.g., assemble components at lower levels to eliminate working at height hazards).

3.1.2 Substitution

After a risk assessment, items can be replaced with less hazardous ones (e.g., using a non-toxic or less toxic chemical rather than a toxic one, using a weaker acid instead of a concentrated acid).

3.1.3 Engineering Controls

If eliminating or substituting a hazard is impractical, then risk can be mitigated with engineering controls. Engineering controls can include re-designing facilities and processes, equipment, or systems to reduce the exposure to the hazard (e.g., guards around moving parts, exhaust ventilation systems to remove gases or dust, interlocks). Design changes must go through the change management process as defined in the *Management System Program*.

3.1.4 Administrative Controls

Administrative controls include written safety procedures, processes, and rules, along with supervision, training, signage, and work permits. Administrative controls are usually implemented together with other types of controls (e.g., engineering, substitution, PPE).

3.1.4.1 Work Permits

Work permits are written controls detailing requirements for performing certain tasks in certain areas. Tasks requiring work permits include:

- Hot work (i.e. welding and cutting);
- Tasks with the potential for hazardous energy requiring lockout and tagout;
- Tasks performed in a confined space;
- Critical lifts; and
- Radiation work.

Work permits are valid only for the specific job for which they are issued and subject to cancellation if job conditions change.

3.1.4.2 Job Hazard Analysis

A JHA is completed for new or non-routine jobs that do not have documented hazard controls included in work instructions or are classified as critical jobs (e.g., welding in a confined space). The JHA process breaks a task down into its steps, identifies known hazards that are present or are reasonable to occur, and develops controls to maintain worker health and safety. The JHA is completed during the planning stages by site management, supervision, involved competent workers, and qualified persons, if required, in advance of the job start.

3.1.4.3 Field Level Hazard Assessment

An FLHA is performed and used by workers to identify hazards specific to the work location, workers performing the work, and those items that have not been identified during the JHA process. Task steps, hazards and controls identified are reviewed by the supervisor and later audited by the management team. Those that pose significant risk to health and safety are reported and documented and shall be subject to further risk assessment causing the JHA or work instruction to be updated, as required.

3.1.4.4 Procedures

Written and documented steps and controls for completing tasks associated with licensed activities shall be documented in the form of plans, procedures, safe work practices, and work instructions when directed by risk assessment results. Documentation from the planning and implementation process is subject to the document control process.

3.1.4.5 Signage

Signs indicating workplace hazards, requirements, and restrictions are posted at various applicable locations throughout the site. Examples include signs at entrances to work areas requiring specific PPE, confined spaces, and high radiation areas. (e.g., Noise level above 85dbA hearing protection is to be used, No entry to unauthorized persons). Consideration is given to size, visibility, legibility, and legal requirements when designing the signs. Procedures confirm signs are removed when no longer needed.

3.1.4.6 Alarms and Warning Devices

If practical or required by legislation, warning systems are installed using audible, visual, or odorous notification techniques to warn workers of situations that can affect their health and safety such as a change in the work environment or a change or malfunction in a piece of equipment. Examples of warning systems include fire alarms, high pressure alarms, and flashing beacons. Systems are tested periodically to ensure they are functional and reach the correct audience.

3.1.5 Personal Protective Equipment

PPE is vital to worker safety when other controls cannot mitigate a health and safety risk to an acceptable standard. Selection, use, and maintenance of general PPE is described in the procedure, DMC-HS-160 *Personal Protective Equipment*.

PPE is the last line of defense in the hierarchy of controls but can be used with other types of control. PPE is inspected periodically to check that it is not damaged or beyond its expiry date.

3.1.6 Emergency Management

Emergency response plans and further details on emergency management can be found in the *Emergency Preparedness and Response Program*. All plans will be documented, communicated, and posted in specific locations available to all personnel.

3.1.7 GHS/WHMIS

Workplace Hazardous Materials Information System 2015 (WHMIS 2015) is an internationally consistent approach to classifying chemicals and communicating hazard information and has been designed to give employers and workers information about hazardous materials used in the workplace.

For more information please refer to DMC-HS-171 *Workplace Hazardous Materials Information System* procedure.

3.2 Incident and Non-Conformance Reporting

Denison requires that workers, supervisors, and contractors report information relating to health and safety incidents and non-conformances in alignment with the DMC-QUA-105, *Non-Conformance Procedure*. Events are categorized with an actual and potential severity rating, which determines event reporting requirements internally and externally. These incidents include, but are not limited to:

- Near misses;
- Motor vehicle incidents;
- Property damage;
- Injuries whether or not treatment is provided;
- Potential and actual exposures to radiation above action and target levels; and

- Dangerous occurrences.

Incidents and non-conformances that meet or exceed legislated reporting limits are reported to applicable regulatory agencies within legislated timelines. Reporting follows the process outlined in the *Management System Program.*

3.3 Return to Work

In the event of a workplace injury the return-to-work process will be followed. The Return to Work (RTW) process is designed to provide workers who have sustained an occupational injury or illness with modified duties for the purpose of returning the employee to their regular duties within a defined time frame. RTW will be based upon medical restrictions with clear and specific limits as defined by a medical professional. These restrictions may arise from an event resulting from physical, cognitive and/or psychological injury. RTW is a planned process to manage the impact of disability in a workplace.

The documented processes are for the purpose of identifying and providing alternate or modified work (temporary or permanent) for injured workers, if necessary, with a progression to pre-injury work when appropriate. RTW is supported by Denison's *Human Performance Management Program*, Denison's Human Resources Group, and shall be implemented and monitored by the worker's line manager.

3.4 Planned Preventative Maintenance

Equipment and material procured and used for the Operation is subject to inspection and planned maintenance to confirm it is stored, calibrated, and maintained at a specified frequency in consideration of manufacturer and regulatory requirements. This is managed in accordance with the *Facility and Equipment Management Program.*

3.5 Contractor Management

Contractors performing work at the Operation are governed by this Program or an equivalent health and safety management program of their own which has been formally authorized by Denison for use at the Operation. The process for verifying contractors adhere to health and safety requirements, and the process for reviewing and accepting a contractor health and safety management program, is outlined in the *Contractor Management Plan* as part of the *Facility and Equipment Management Program.*

4 Check

4.1 Monitoring and Measurement

Health and safety performance is monitored and measured against established objectives and targets (identified in Section 2.2). Denison will monitor, measure, analyze, and evaluate its health and safety performance based on a defined process outlined in the *Management System Program*.

All monitoring and measurement activities must also meet defined quality assurance and quality control requirements outlined within relevant Plans as part of this Program.

The results of monitoring and measurement activities are communicated internally and externally and documented as part of the WRE-QUA-101 *Records Management* outlined in the *Management System Program.*

4.2 Performance Indicators

The KPIs that result from monitoring show whether the Program is meeting or beating legislated limits on areas such as noise levels, airborne dust concentrations, noxious gas concentrations, radiation levels, chemical concentrations and other materials that can have a deleterious effect on worker health.

4.3 Workplace Exposure and Monitoring

Where occupational exposure monitoring is required for chemical, physical, or biological agents, established sample collection and analysis methods are used to quantify exposure risk. Results from personal occupational exposure and workplace monitoring are collected, maintained, stored, and communicated with the workforce or individual involved.

Review and analysis of personal exposure and workplace monitoring results are performed to identify trends or abnormal results and to take appropriate corrective actions. Exceedances of established internal or external regulatory limits are reported as required. Investigations are initiated and corrective actions implemented in accordance with the corrective action process.

Occupational health assessments are performed as required to evaluate changes to worker health due to exposure to industrial hygiene or occupational health hazards. Work related changes in worker health status that indicate a lack of exposure controls, inappropriate use of controls or factors outside of the workplace that can be affecting the same areas of the body (e.g., noise exposure causing noise-induced hearing loss) must be addressed and corrected in a timely manner.

Occupational health assessments benefit the worker by providing knowledge of occupational health hazards and the appropriate protection from these hazards. Results from occupational health assessments are collected, maintained, stored, and communicated with the worker involved.

4.4 Inspections and Audits

Denison will conduct internal audits of the *Health and Safety Management Program* to assure compliance with the requirements set out in the Program and to determine if the Program is effectively implemented and maintained.

The internal audits will follow the process and procedures outlined in the *Management System Program*.

Inspections and compliance or conformance audits are performed regularly to determine the effectiveness of the Program. Audits are performed by a competent person not involved in the work being assessed.

Workplace inspections are conducted by workers, supervisors, and managers to determine progress of the Program and to facilitate risk management.

Monitoring and inspection activities can include and are not limited to:

- Physical condition inspections;
- Job observations;
- Field level hazard assessment;
- Planned maintenance inspections;
- Daily pre-use equipment checks;
- Safety audits;
- Management of external inspections by regulatory agencies and other third-party auditors;
- Housekeeping inspections; and
- Monitoring of workplace contaminants.

These inspection activities monitor the effective and efficient use of hazard controls and identify any deviations in processes or non-compliance with regulatory standards. Details of how inspections will be performed are outlined in the *Workplace Inspections* procedure.

These audits, inspections and observations also determine the presence and growth of safety culture within the Operation.

4.5 Management Review

The *Health and Safety Management Program* will be reviewed by Denison management in accordance with the defined frequency to determine if the defined Program is meeting its objectives or needs adjustment. Examples of the types of items related to radiation protection that Denison management will review can include, but is not limited to:

- Suitability, adequacy, and performance of program objectives and targets;
- Upcoming or new legislation related to health and safety requirements;
- Recent or planned changes in facility operations;
- Results of monitoring in relation to meeting performance objectives and targets;
- Results of audits and inspections in relation to meeting performance objectives and targets;
- Results of health and safety culture monitoring and assessments;
- Results of occupational exposure monitoring results;
- Identified opportunities for improvement based on trends in injuries, exposures, incident reports and other sources;
- Communications from interested parties;
- Adequacy of resources; and
- Any needs for Program adjustment.

Denison management will identify opportunities for improvement and establish action plans to implement change in accordance with the process outlined in the *Management System Program*.

5 Act

5.1 Corrective Action

Non-conformities or areas for improvement are identified following the process outlined in the *Management System Program* and the supporting procedures. Deviations from this Program and examples of other non-conformities can be found in Section 3.2 and include environmental incidents, near-misses, and deviations from the *Health and Safety Management Program.* Non-conformities can also be identified during inspections and audits.

Responses to identification of non-conformities include investigation of cause, and corrective action if appropriate. Corrective actions are planned, implemented, and reviewed for effectiveness in reducing the risk level. A new hazard and risk assessment is performed once the corrective action is in place.

Corrective actions process is further detailed in the *Management System Program*.

5.2 Continual Improvement

Opportunities for improvement of this Program will be identified and addressed to enhance health and safety performance. The continual improvement process for this Program follows the overall continual improvement process outlined in the *Management System* and the supporting procedures. Continual improvement shall also include updating Program objectives and targets based on changing circumstances or new information. Improvement can involve benchmarking performance against other similar projects and facilities. Any changes identified through the continual improvement process will be implemented in a systematic and controlled manner.

With respect to health and safety management, opportunities for continual improvement shall be identified through workplace inspections, incident investigations, lessons learned, and review of training suitability, adequacy, and effectiveness for the Operation.

6 References

6.1 Internal

Document Number	Document Name
41	Contractor Management Plan
	Emergency Preparedness and Response Program
	Facility and Equipment Management Program
DMC-HS-164	Field Leadership
	Field Level Hazard Assessment
	Human Performance Management Program
	Job Hazard Analysis
DMC-QUA-105	Non-Conformance Procedure
DMC-HS-160	Personal Protective Equipment
	Radiation Protection Program
	Training Management Program
DMC-HS-171	Workplace Hazardous Information Management System
	Workplace Inspection Procedure

6.2 External

Canadian Nuclear Safety Commission (CNSC). *Nuclear Safety and Control Act*

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The Saskatchewan Employment Act

The Occupational Health and Safety Regulations, 2020

The Mines Regulations, 2018