

# Gazzola Paving Limited



## Sustainability Report 2025

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## 1. Introduction

Gazzola Paving Limited is committed to sustainable practices that balance economic growth, environmental stewardship, and social responsibility. Our sustainability initiatives focus on reducing carbon emissions, optimizing resource efficiency, and fostering community well-being.

## 2. Gazzola at a glance

For over 68 years, Gazzola Paving has been a trusted leader in the construction industry, specializing in roadbuilding, reconstruction, asphalt production, and winter maintenance services across the Greater Toronto Area. As a family-owned and operated company, we take pride in delivering top-tier workmanship, combining decades of experience with cutting-edge technology and sustainable practices.

Our ability to produce our own asphalt and aggregate materials allows us to maintain strict quality control while ensuring cost-effective and environmentally responsible solutions. Backed by a skilled workforce and a modern fleet of construction equipment, we are equipped to handle projects of any scale, from major highways and city streets to parking lots and private developments.

At Gazzola Paving, we understand that adaptability and efficiency are key to meeting client needs. Our dedicated winter maintenance division, consisting of over 120 snow-clearing and de-icing machines, ensures roads remain safe and accessible even in the harshest conditions. Whether it's a fast-track emergency project or a long-term infrastructure commitment, our team is ready to deliver results—on time and within budget.

By upholding a commitment to innovation, sustainability, and customer satisfaction, Gazzola Paving continues to build a reputation as solid as the roads we construct.

## 3. A Brief History of Gazzola

Virginio Gazzola arrived in Canada in 1925 part of a huge wave of immigration that would make Toronto the second largest Italian-speaking city in the world. And like so many other Italian immigrants Virginio turned to construction to help support his wife Rose and their young family and build a new life.

In 1952, Virginio started a landscaping business and quickly discovered that he was a born entrepreneur. He had an ability to wring every bit of value from a project, often salvaging copper pipe and other metal that he found and selling to the local scrap metal dealers. But starting a new business is never easy. Antoinette, Virginio's daughter, still remembers standing on street corners with the rest of the family, selling Christmas trees to help make ends meet.

Two years later, Mark, Virginio's eldest son, joined the business. He was just fifteen years old and needed a special permit to drive the dump truck that, along with a roller, constituted the family's entire investment in equipment.

The landscaping business started to grow and with it came a new opportunity. Clients wanted asphalt driveways and the Gazzolas found themselves in the paving business. But this was still very much an off the cuff enterprise that kept the family scrambling. Not for them, the luxury of an office or their own yard.

"We used to meet at the Supertest Gas Station at Eglinton and Caledonia Road where we parked the equipment," recalls Mark Gazzola.

It would be 1956 before the Gazzolas rented their first office. The equipment, however, still had to be parked across the street from what is presently Knob Hill Farms on Weston Road at the old British North American gas station.

Virginio's children were, by now, becoming more involved in the day to day operations. Mark worked fulltime in operations, Antoinette did the bookkeeping and when their younger brother, Vern, turned fifteen, he too signed on. For additional help, the family looked to friends and acquaintances from the area, some of whom are still with the company today.

As the business grew, it became obvious that the company needed its own premises if it was to continue to prosper so in 1962 the family bought a building and yard on Toryork Road. It would be the headquarters of the operation for the next thirteen years.

In 1975, the Gazzolas acquired Martan Contracting, a sewer and watermain company, and moved the entire operation to Martan's yard in Concord, Ontario. Virginio passed away in 1981 just before the family managed to fulfill what had been a long held dream - owning their own asphalt plant.

In 1982, Vern and Mark, always on the lookout for a bargain, went to a Ritchie Brothers Auction. "One of the items up for bid was a used asphalt plant. It was too good an opportunity to pass up," recalls Vern Gazzola. "We made the decision on the spot." To establish the company's asphalt production, Vern and Mark Gazzola bought a DM-71 Barber Greene plant that had been operating in Pincher Creek, Alberta and set it up at a yard on Attwell Road in Rexdale. When work on the Skydome was completed, the crushing plant was also moved to Rexdale eventually joining the asphalt plant at the Attwell Road facility. In 1997, having outgrown the Martan Contracting yard in Concord, Gazzola Paving moved to Carlingview Drive and built a new modern office and shop facility with plenty of room for expansion. The new facility was officially opened in 1998 by the then Minister of Transportation, Al Palladini.

## 4. Sustainability Policy Statement



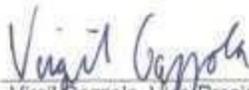
### GAZZOLA PAVING LIMITED Sustainability Policy

Gazzola Paving Limited is committed to environmental leadership and sustainability in all of our business activities. We have established practices and procedures to provide a safe and healthful workplace to protect the environment, conserve energy and natural resources. These practices and procedures will allow us to achieve a healthy and safe environment.

The Canadian Net-Zero Emissions Accountability Act, which became law on June 29, 2021, enshrines in legislation Canada's commitment to achieve net-zero emissions by 2050. The Act ensures transparency and accountability as the government works to deliver on its targets. Gazzola is committed to leading by example, and is accelerating our own carbon reducing initiatives further using both carbon offsets and new asphalt production processes to become a Scope 1 and 2 carbon neutral asphalt plant and paver by 2030.

Gazzola Paving Limited is committed to:

- Providing a safe and healthful workplace; ensure personnel are trained and equipped to prevent environmental incidents, in the event of an incident, respond within their capabilities.
- Disposing of waste safely and responsibly in accordance with applicable laws and regulations.
- Being environmentally responsible in the community where we operate; correcting incidents or conditions that endanger health, safety, or the environment.
- Improving operations and adopting technologies to minimize waste and pollution, and to eliminate health and safety risks.
- Ensuring responsible energy use throughout our business including conserving energy, improving energy efficiency, and choosing renewable over non-renewable energy when feasible.
- Meeting or exceeding all applicable Federal, Provincial and Municipal laws, and work to continually improve our environmental management system.
- Promoting a diverse and inclusive workplace where all employees feel valued and empowered. We are committed to removing barriers to employment and advancement and fostering a culture of respect, equity, and collaboration across all levels of the organization.
- Supporting and encouraging the advancement of women in the construction and paving industry through mentorship, leadership development, and inclusive hiring practices. We strive to create equal opportunities for women to thrive, lead, and shape the future of our industry.
- Maintaining training procedures to ensure all employees are knowledgeable of and are able to comply with all applicable environmental laws and regulations.
- Transparently tracking and reporting all key carbon emission KPIs on our website

  
Virgil Gazzola, Vice President

March 5, 2024  
Date

## 5. Environmental sustainability

### 5.1 Gazzola Paving Limited Environmental Policy



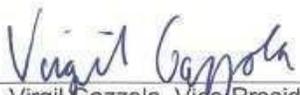
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- Being environmentally responsible in the community where we operate; correcting incidents or conditions that endanger health, safety, or the environment.
- Improving operations and adopting technologies to minimize waste and pollution, and to eliminate health and safety risks.
- Ensuring responsible energy use throughout our business including conserving energy, improving energy efficiency, and choosing renewable over non-renewable energy when feasible.
- Meeting or exceeding all applicable Federal, Provincial and Municipal laws, and work to continually improve our environmental management system.
- Promptly reporting all non-compliance issues and/or incidents in accordance with all applicable Federal, Provincial and Municipal reporting requirements; evaluating causes of non-compliance and implement corrective actions.
- Ensuring periodic review of our compliance with all applicable laws and regulations.
- Maintaining training procedures to ensure all employees are knowledgeable of and are able to comply with all applicable environmental laws and regulations.
- Transparently tracking and reporting all key carbon emission KPIs on our website
- Promptly correcting any practice or condition that is not in keeping with this policy.

  
Virgil Gazzola, Vice President

March 5, 2024  
Date

## 5.2 Environmental Management Plan Overview

Gazzola is committed to minimizing the adverse effects on these resources from its operations. This robust plan factors in plans already underway and those we will be launching and working on in the years to come.

The Canadian Net-Zero Emissions Accountability Act, which became law on June 29, 2021, enshrines in legislation Canada's commitment to achieve net-zero emissions by 2050. The Act ensures transparency and accountability as the government works to deliver on its targets. Gazzola Leadership is committed to leading by example, and is exploring and accelerating our own carbon reducing initiatives further either through offset or new asphalt production processes to become a Scope 1 and 2 carbon neutral asphalt plant and paver by 2030.

Our current initiatives include:

### Vehicles and Equipment Emissions

- GPS monitoring the efficiency in the movement of goods and idling times of all equipment.
- Gazzola has invested heavily in installing GPS in all equipment and vehicles. Local dispatchers review idling daily, while the Executive Management reviews idling times weekly.
- For heavy equipment, idling times have been programmed to ensure units shutdown after five minutes of idling or provide an audible alarm warning to the operator to shut the unit down.
- With a push to more carbon neutral future, Gazzola is currently signed on to participate and or actively sharing performance data for the following initiatives:
  - Electrification pilot with Peterbilt for our Haulage and Winter Maintenance snow plow operations to determine the feasibility of electric equipment (Commencing in 2022)
  - Fully switched over our diesel usage to Esso Diesel Efficient™ with McDougall Energy, with the help of our GPS reporting and mechanic staff assisting Esso in validating their claimed 2-3% fuel economy improvements that go along with the environmental impacts of 10% less NOx, 22% less particulate matter emissions and 2.8% less carbon dioxide emissions.

### 5.3 Asphalt Plant Operations

- Gazzola's asphalt plant meets and exceeds the required government noise and emission control measures; in addition, and where possible, Gazzola utilizes a paved yard to reduce the amount of water-saturated in the piles of aggregates, thereby reducing energy consumption.
- Dust management and traffic plans at our asphalt plant are built and monitored collaboratively with our neighbors and our customers to ensure our operation is tidy and respectful of all.
- Individual job specific environmental plans are developed and strictly adhered to on the most complex projects, significantly reducing the environmental impact.
- Gazzola monitors the moisture content of raw materials used in asphalt production to reduce energy consumption and emissions.
- Gazzola has added scrubbers to the asphalt plant to reduce our carbon footprint.

### 5.4 Recycle and Reuse of Materials

- Gazzola is a significant producer of recycled concrete in the GTA area, which it uses as road base aggregates. To reduce the carbon footprint, Gazzola has adopted a policy to minimize the amount of virgin aggregates used wherever possible.
- Gazzola's Asphalt Plant is set up to incorporate a percentage of Recycled Asphalt into asphalt plant production, again reducing the use of virgin aggregates and liquid Asphalt Cement when mixes and specifications allow for its' usage.

### Air Quality & Greenhouse Gas Emissions Management Plan

Currently in development, Gazzola's Air Quality and Greenhouse Gas Management Plan will describe in detail the mitigation measures undertaken to reduce potential effects on air quality and greenhouse gas emissions from project activities. The plan will outline requirements for reporting and monitoring, and the personnel needed to implement these actions. Additional mitigation measures will be put in place in the designated project area so that air quality meets regulatory requirements.

As part of our work to become a Scope 1 and 2 carbon neutral asphalt operation by 2030, KPI tracking and reporting is underway to determine the best way to achieve this goal.

GAZZOLA PAVING LIMITED - KNOWN CARBON IMPACTS BY SOURCE													
ASPHALT PLANT 345 Attwell Drive		2022 Season		UNITS		2023 Season		UNITS		2024 Season		UNITS	
ASPHALT PRODUCTION	Toronto Hydro	1,211,573	kWh	1,121,487	kWh	1,348,789	kWh						
	Twin Eagle/Enbridge	3,374,250	M3	3,021,800	M3	2,479,908	M3						
	Equipment (Dyed Diesel)	20,879	Litres of Fuel	19,748	Litres of Fuel	19,874	Litres of Fuel						
RAW MATERIAL DELIVERY	Asphalt Cement to Plant	8,124	Litres of Fuel	7,184	Litres of Fuel	6,987	Litres of Fuel						
	Stone to Plant via 3rd Party Dump Truck	310,000	Tonnes Delivered	294,000	Tonnes Delivered	153,426	Tonnes Delivered						
ASPHALT INSTALLATION	Trucking to Job Sites by 3rd Party Dump Truck	29,985	Hours	22,741	Hours	107,896	Hours						
	Paving Equipment (Dyed Diesel)	334,879	Litres of Fuel	321,453	Litres of Fuel	349,124	Litres of Fuel						
HEAD QUARTERS/SHOP	Toronto Hydro	215,984	kWh	169,841	kWh	204,879	kWh						
	Enbridge	31,542	m3	29,251	m3	34,879	m3						
	Floats ( Diesel)	7,609	Litres of Fuel	6,084	Litres of Fuel	6,248	Litres of Fuel						
	Equipment (Dyed Diesel)	0	Litres of Fuel	0	Litres of Fuel	0	Litres of Fuel						
	Vehicles (Gas)	199,748	Litres of Fuel	186,672	Litres of Fuel	210,789	Litres of Fuel						
WINTER MAINTENANCE	Snow Plows (Diesel)	71,542	Litres of Fuel	63,154	Litres of Fuel	81,795	Litres of Fuel						
	Equipment (Dyed Diesel)	34,551	Litres of Fuel	29,475	Litres of Fuel	47,846	Litres of Fuel						

Additional mitigation measures are primarily focused on:

- Preventative maintenance of the asphalt plant option incorporating the latest burner technology into to reduce air emissions.
- Reducing Vehicle & Equipment Emissions
- Fence line monitoring of air quality during operations.
- Developing a gas leak detection program along with any other monitoring requirements defined by the Ontario Ministry of the Environment and as a permit condition will be included in the Air Quality and Greenhouse Gas Management Plan

### 5.5 NET-ZERO CHALLENGE ACCEPTED

This year, we are fully embracing the Net Zero Challenge, committing to reducing our carbon footprint and driving sustainable innovation in every aspect of our operations. From adopting energy-efficient machinery and renewable energy sources to optimizing logistics and waste reduction strategies, we are taking decisive steps toward minimizing greenhouse gas emissions. Our focus is on integrating circular economy principles, utilizing recycled materials, and implementing advanced technologies to enhance efficiency and sustainability. Through

collaboration with industry leaders, continuous improvements in environmental practices, and a dedication to responsible resource management, we are not just aiming for net zero—we are setting a new standard for sustainable construction. Challenge accepted.

### 5.5.1 GHG Emissions Summary

COMPARISON OF CO <sub>2</sub> e - LATEST YEAR WITH BASE LINE YEAR					
YEAR	BY 2022	2023	2024	2025	Reduction %
SCOPE-1	8273.85	7092.51	6670.45	6083.47	36.01
SCOPE-2	103.73	95.22	113.95	99.68	4.06
SCOPE-3	997.30	962.47	768.23	962.16	3.65
Aggregate	9374.88	8150.19	7552.63	7145.31	31.20

### 5.5.2 GHG Emission Inventory 2024

GAZZOLA PAVING LTD - GHG EMISSION INVENTORY 2025								
SCOPE	PROCESS	Unit	Quantity	CO <sub>2</sub> (KgCO <sub>2</sub> )	CH <sub>4</sub> (kg)	N <sub>2</sub> O (kg)	CO <sub>2</sub> e (Mt)	CO <sub>2</sub> e (Mt)
SCOPE -1	ASPHALT PRODUCTION & PAVING						6083.47	7145.31
	Twin Eagle/Enbridge (Natural Gas)	m3	2,197,762	4219703	81.317194	72.526146		
	Equipment (Dyed Diesel)	L	17,116	47120	0.102696	0.530596		
	Paving Equipment (Dyed Diesel)	L	331,884	913677	1.991304	10.288404		
	Floats (Diesel)	L	5,910	16270	0.03546	0.18321		
	HEADQUARTERS/SHOP							
	Vehicles (Gas)	L	206,711	476882	20.6711	4.13422		
	WINTER MAINTENANCE							
	Snow Plows (Diesel)	L	86,392	237837	0.518352	1.72784		
	Equipment (Dyed Diesel)	L	51,729	142410	0.310374	1.03458		
	TOTAL			6053900	104.94648	90.424996		
SCOPE -2	ASPHALT PRODUCTION & PAVING						99.68	7145.31
	Toronto Hydro (Electricity for palnt)	KWh	897,510	26925	0	0		
	HEADQUARTERS/SHOP							
	Enbridge (Natural Gas)	m3	34,536	66309	1.277832	1.139688		
	Toronto Hydro (Electricity)	KWh	202,459	6074	0	0		
	TOTAL			99308	1.277832	1.139688		
SCOPE -3	ASPHALT PRODUCTION & PAVING						962.16	7145.31
	Trucking to Job Sites (3rd Party Dump Truck)	L	425678	746214	2.554068	8.51356		
	RAW MATERIAL DELIVERY							
	Asphalt Cement to Plant (Fuel)	L	8820	15461	0.05292	0.1764		
	Stone to Plant via 3rd Party Dump Truck	L	112463	197148	0.674778	2.24926		
	TOTAL			958823	3.281766	10.93922		

### 5.5.3 GHG Emission Inventory Base Year 2022

GAZZOLA PAVING LTD - GHG EMISSION INVENTORY 2022 BASE YEAR								
SCOPE	PROCESS	Unit	Quantity	CO <sub>2</sub> (KgCO <sub>2</sub> )	CH <sub>4</sub> (kg)	N <sub>2</sub> O (kg)	CO <sub>2</sub> e (Mt)	CO <sub>2</sub> e (Mt)
SCOPE -1	ASPHALT PRODUCTION & PAVING							
	Twin Eagle/Enbridge (Natural Gas)	m3	3,374,250	6478560	124.84725	111.35025	8273.85	9374.88
	Equipment (Dyed Diesel)	L	20,879	57480	0.125274	0.647249		
	Paving Equipment (Dyed Diesel)	L	334,879	921922	2.009274	10.381249		
	Floats (Diesel)	L	7,609	20948	0.045654	0.235879		
	HEADQUARTERS/SHOP							
	Vehicles (Gas)	L	199,748	460819	19.9748	3.99496		
	WINTER MAINTENANCE							
	Snow Plows (Diesel)	L	71,542	196955	0.429252	1.43084		
	Equipment (Dyed Diesel)	L	34,551	95119	0.207306	0.69102		
TOTAL			8231802	147.63881	128.731447			
SCOPE -2	ASPHALT PRODUCTION & PAVING						103.73	9374.88
	Toronto Hydro (Electricity for plant)	KWh	1,211,573	36347	0	0		
	HEADQUARTERS/SHOP							
	Enbridge (Natural Gas)	m3	31,542	60561	1.167054	1.040886		
	Toronto Hydro (Electricity)	KWh	215,984	6480	0	0		
TOTAL			103387	1.167054	1.040886			
SCOPE -3	ASPHALT PRODUCTION & PAVING						997.30	9374.88
	Trucking to Job Sites (3rd Party Dump Truck)	L	120516	323000	0.723096	2.41032		
	RAW MATERIAL DELIVERY							
	Asphalt Cement to Plant (Fuel)	L	8124	22365	0.048744	0.16248		
	Stone to Plant via 3rd Party Dump Truck	L	235999	649705	1.415994	4.71998		
TOTAL			995071	2.187834	7.29278			

### 5.5.4 TCFD Disclosure on Net Zero Commitment

#### 5.5.4.1 Governance

The Board of Directors oversees the company’s climate-related risks and opportunities, emphasizing the transition of the plant and paving and other operations to net-zero emissions by 2050. A dedicated Sustainability Committee collaborates closely with management to ensure that the strategy is integrated into operational decision-making and that progress is reported regularly.

#### 5.5.4.2 Strategy

At NetZero, we embrace the challenge of building a sustainable future by driving bold action against climate change. Our vision is to empower businesses to take decisive steps toward a net-zero economy, where every organization thrives while reducing its environmental impact. We believe that achieving net-zero emissions is not just a goal but a responsibility — and we are determined to lead the way.

Our mission is to tackle emissions across all three scopes — Scope 1 (direct emissions), Scope 2 (indirect emissions from energy use), and Scope 3 (emissions from the supply chain and product lifecycle) — with a relentless focus on measurable impact. We are

committed to disaggregating these emissions to provide clear pathways for our clients to reduce their carbon footprint at every level of their operations.

As a challenge-taking firm, we hold ourselves accountable to ambitious interim targets: a 35% reduction in emissions by 2030 and 70% by 2040. These targets serve as a testament to our dedication to driving real, lasting change in the fight against climate change. We believe in the power of innovation, transparency, and collaboration to turn the complex task of carbon reduction into a tangible and achievable goal for every business.

Let's face the future of sustainability together — one step, one emission reduction, at a time.

#### 5.5.4.3 Risk Management

Failure to control GHG emissions presents significant risks that can disrupt operations and impact long-term profitability. As the world increasingly prioritizes sustainability, organizations that don't take action may face heightened exposure to transition risks. These include the potential for carbon taxes, stricter emissions regulations, and shifting customer preferences for low-carbon products — all of which can create financial pressure and operational challenges.

At NetZero, we proactively assess these risks and help clients navigate the complexities of the low-carbon transition. We're transitioning to renewable energy sources to reduce our reliance on fossil fuels, and investing in low-carbon asphalt technologies to stay ahead of regulatory changes and market demands. By taking these steps, we not only protect our own operations but also empower our clients to future-proof their businesses.

In addition to transition risks, we also evaluate physical climate risks, such as extreme weather events like flooding and heatwaves, that could disrupt production and supply chains. Our comprehensive climate risk management plan includes infrastructure upgrades designed to safeguard against these extreme events, alongside adaptive measures to ensure business continuity. Together, we're building resilience to ensure our operations — and yours — remain sustainable in the face of climate challenges.

By addressing both transition and physical climate risks, we help our clients stay competitive, comply with evolving regulations, and meet the growing demand for sustainable products. Let's embrace the future with confidence, ensuring your business remains resilient in an ever-changing world.

#### 5.5.4.4 Metrics and Targets

As part of our NetZero Challenge, we have established ambitious emissions reduction targets for our operations, with a roadmap that aligns with global climate goals:

To achieve net-zero, our key strategies include:

1. Implementing best industry practices and a scientific approach to enhance machinery efficiency, reducing energy consumption and emissions by 35% in 2030 and 75% by 2040 across Scope 1 and Scope 2.
2. Launching “FLEET ZERO” – our green freight plan to decarbonize fleet vehicles and increase renewable energy usage, targeting a 35% emissions reduction by 2030 and 75% by 2040 across Scope 1, Scope 2, and Scope 3.
3. Upgrading machinery with electrical and mechanical extensions to regulate energy flow and transition to renewable energy-powered equipment, aiming for a 35% reduction in emissions by 2030 and 75% by 2040 in Scope 1 and Scope 2.
4. Collaborating with transportation companies to set carbon reduction targets, striving for a 35% emissions reduction by 2030 and 75% by 2040 across Scope 1, Scope 2, and Scope 3

## **5.5.4.5 Progress Against Sustainability Commitments**

### **1. Reducing Energy Consumption in Aggregate Drying Operations**

#### **Progress Against This Commitment**

To achieve our goal of reducing energy consumption and emissions by 35% by 2030 and 75% by 2040 across Scope 1 and Scope 2, we implemented several operational improvements in our asphalt production process.

In 2023, we introduced measures to reduce the moisture content of aggregates prior to entering the dryer. Aggregate stockpiles are now covered to minimize exposure to precipitation, which reduces moisture absorption and lowers the energy required for drying during asphalt production.

In addition, shovel operators were instructed to collect aggregates from the sun-exposed east side of the stockpiles, where natural solar drying helps reduce moisture levels. We also paved the aggregate storage areas to prevent moisture from migrating from the ground into the materials.

Daily monitoring of aggregate moisture content ensures that only materials with less than 5% moisture are fed into the plant. These operational changes significantly improved plant efficiency and reduced energy consumption.

Building on these initiatives, in 2025 we implemented a heat recovery system in the asphalt plant. The system captures excess thermal energy generated during production and redirects it back into the plant's processes, reducing the amount of natural gas required for aggregate drying.

As a result of these improvements, we achieved a reduction of approximately 282,000 m<sup>3</sup> of natural gas consumption in 2025, representing a 12% decrease compared to the previous year. These improvements contributed to a 36% reduction in Scope 1 emissions compared to our baseline year, enabling us to successfully achieve our first interim emissions reduction target ahead of schedule.

### **2. Launching “Fleet Zero” – Green Freight Plan**

#### **Progress Against This Commitment**

To support our emissions reduction targets of 35% by 2030 and 75% by 2040 across Scope 1, Scope 2, and Scope 3, we launched “Fleet Zero,” a comprehensive green freight strategy aimed at decarbonizing fleet vehicles and increasing renewable energy use.

Key initiatives include the gradual replacement of 21 light-duty supervisory trucks with electric vehicles used for snow operations, beginning with six vehicles in year one and expanding over <sup>12</sup>

subsequent years.

Additionally, 13 medium-duty trucks will be equipped with CNG retrofit systems, implemented through a phased rollout to reduce diesel consumption and lower greenhouse gas emissions. To improve fuel efficiency across the fleet, snow operation vehicles are also being upgraded with telematics systems and low-rolling-resistance tires, which allow better monitoring of fuel use and vehicle performance.

To support fleet electrification, we will install electric vehicle charging infrastructure at our headquarters, including both Level 2 and Level 3 chargers. Installation will begin in year one and expand through year seven as the number of electric vehicles in our fleet increases.

Heavy-duty fleet upgrades are also planned through the replacement of diesel-powered Class 7/8 chassis cabs with natural gas-powered trucks, which significantly reduce emissions compared to traditional diesel engines.

In addition, we are conducting pilot programs to evaluate alternative fuels, including compressed natural gas (CNG), dual-fuel hydrogen technologies, and renewable diesel. These trials will help determine the most effective low-carbon fuel solutions for our operations.

Through these initiatives, Fleet Zero positions our fleet operations for a significant long-term reduction in transportation-related emissions.

### **3. Upgrading Machinery and Energy Systems**

#### **Progress Against This Commitment**

To further reduce Scope 1 and Scope 2 emissions, we are upgrading plant machinery with electrical and mechanical enhancements that improve energy efficiency and support the transition to renewable energy-compatible systems.

One of the key initiatives is the installation of a heat recovery system at the asphalt plant, which captures excess heat generated during production and reuses it within the plant's operations. This significantly reduces the overall energy required for asphalt production.

We are also installing advanced electrical transformers and energy regulation systems to optimize current flow and minimize power losses during plant operation. These improvements allow equipment to operate more efficiently while reducing unnecessary energy consumption.

These upgrades improve plant performance, reduce fuel demand, and support the long-term transition toward renewable energy-powered equipment.

### **4. Collaborating With Transportation Partners to Reduce Scope 3 Emissions**

#### **Progress Against This Commitment**

Scope 3 emissions represent a significant portion of the environmental footprint of construction and asphalt operations, particularly through the transportation and distribution of materials.

To address this, we are actively collaborating with transportation companies to establish carbon

reduction strategies aligned with our sustainability targets.

Our approach includes identifying opportunities to:

- Transition to low-carbon fuels
- Optimize haul routes to improve fuel efficiency
- Introduce electric or hybrid freight vehicles
- Improve fleet efficiency through advanced logistics planning

We are also encouraging our logistics partners to track and report their emissions data, allowing us to better understand the environmental impact of our supply chain and support partners in achieving their own sustainability goals.

Through this collaborative approach, we aim to achieve a 35% reduction in Scope 3 emissions by 2030 and 75% by 2040, ensuring that emissions reductions extend beyond our direct operations and across the entire value chain.

## 5.5.5 Scenario Analysis

### 5.5.5.1 Objective:

The goal is for Gazzola Paving Limited, to achieve net-zero emissions by 2050. The company manufactures asphalt for road construction and is exploring different technological and regulatory scenarios to reach this target.

### 5.5.5.2 Key Emission Sources

Under the Net Zero Technical Guide, the first step in scenario analysis is to identify key emission sources from the asphalt plant:

- Direct emissions from energy use: This includes emissions from natural gas and diesel combustion for heating bitumen in the asphalt production process.
- Indirect emissions from electricity consumption: This includes emissions from the electricity used in the asphalt plant.
- Transport and logistics emissions: Emissions from the transportation of raw materials (e.g., aggregates) and delivery of finished asphalt to construction sites.
- Raw material emissions: Emissions from the extraction, processing, and transportation of materials like bitumen and aggregates.

### 5.5.5.3 Baseline Emissions

Using data from the plant's operations, a baseline emission inventory is created for each emission source:

- Energy use (natural gas): The plant and headquarters consume approximately 3,400,000 m<sup>3</sup> of natural gas per year for heating.
- Electricity use: The plant consumes 1,300,000 kWh of electricity per year, which is currently sourced from a grid with a 30 gCO<sub>2</sub>/kWh intensity.
- Transport emissions: Transport of raw materials and finished products results in 1500 tons of CO<sub>2</sub> emissions annually.
- Raw material emissions: The extraction and transportation of aggregates and bitumen lead to approximately 1000 tons of CO<sub>2</sub> emissions annually.

### 5.5.5.4 Technology Solutions and Pathways

In line with the Net Zero Technical Guide, technology solutions and strategies to reduce emissions are considered across several areas, including:

1. Energy Efficiency Improvements:

- Upgrade to high-efficiency burners and heat recovery systems in the asphalt production process to reduce natural gas consumption.
- Implement advanced energy management systems to optimize energy use across the plant.

2. Renewable Energy Integration:

- Switch to renewable electricity sourced from hydroelectric or wind power in Canada to reduce emissions from grid electricity use.
- Install solar panels on-site to generate a portion of the plant's electricity needs.

3. Carbon Capture and Storage (CCS):

- Implement CCS technology at the plant to capture CO<sub>2</sub> emissions from the heating process. The captured CO<sub>2</sub> can be stored or utilized in industrial applications, further reducing emissions.

4. Low-carbon Technologies in Asphalt Production:

- Use warm mix asphalt (WMA) technology to reduce the temperatures at which asphalt is produced, cutting emissions by reducing the amount of energy required.
- Introduce recycled asphalt pavement (RAP) to reduce the need for virgin aggregates and bitumen, thereby lowering emissions from raw material extraction and transportation.

5. Sustainable Materials:

- Explore bio-based binders as a sustainable alternative to conventional petroleum-based bitumen.
- Increase the percentage of RAP used in the production process, aiming to reach 50% by 2030.

6. Fleet Decarbonization:

- Electrify the transportation fleet for raw material delivery and finished product distribution where feasible, or transition to hydrogen-powered vehicles.

### 5.5.5.5 Scenarios Based on Technology Adoption and Market Conditions

Now, we'll explore four scenarios based on the adoption of these technologies, energy policies, and external market factors.

#### 1. Scenario 1: Accelerated Green Transition (Optimistic)

- Assumptions:
  - Rapid technological advancements lead to significant cost reductions in renewable energy and low-carbon asphalt production technologies.
  - Canadian government enforces stringent carbon pricing (e.g., \$100/ton CO<sub>2</sub> by 2030) and provides generous subsidies for clean technologies.
  - A strong market demand for sustainable construction materials drives industry-wide adoption of green practices.
  - The plant installs 100% renewable electricity (hydropower), adopts CCS for carbon capture, and uses 50% RAP in production.
  - On-site solar panels and wind turbines help reduce electricity costs and carbon intensity.
- Outcome:
  - By 2030, the plant achieves a 50% reduction in carbon emissions, primarily through energy efficiency upgrades, renewable energy, and CCS.
  - The plant reaches net-zero by 2045, largely due to widespread adoption of low-carbon asphalt production technologies, renewable energy, and carbon offsets.
  - Gazzola gains a competitive market position with a reputation for sustainability and is awarded government contracts for infrastructure projects.

#### 2. Scenario 2: Steady Technological Progress (Moderate)

- Assumptions:
  - Renewable energy adoption increases gradually, but the plant continues to use a mix of natural gas and electricity from the grid.

- The government introduces moderate carbon pricing and offers tax incentives for green tech adoption.
- The market demand for sustainable materials grows, but not as rapidly as expected.
- The plant adopts warm mix asphalt (WMA) technology, increases the use of RAP to 30%, and reduces its natural gas consumption by 20%.
- Carbon capture technology is piloted but is not yet scaled due to high costs.
- Outcome:
  - By 2040, the plant reduces emissions by 65%, largely through energy efficiency and a transition to cleaner energy sources.
  - The plant reaches net-zero emissions by 2050, but the transition is slower and more reliant on carbon offset purchases due to limited uptake of cutting-edge technologies.
  - The company faces higher operating costs in the short-term but remains competitive in a market that increasingly values sustainability.

### 3. Scenario 3: Slow Adoption and Market Constraints (Pessimistic)

- Assumptions:
  - Technological adoption is slow due to high costs and market resistance to change.
  - Carbon pricing remains low, and government incentives for green technologies are limited.
  - Market demand for sustainable asphalt is lower than expected, with contractors focused on cost rather than sustainability.
  - The plant continues to use natural gas as its primary energy source and adopts basic efficiency measures like upgrading burners.
  - Only small amounts of RAP are used, and carbon capture remains unfeasible.
- Outcome:
  - By 2040, emissions reductions are minimal, and the plant only achieves a 10-15% reduction in emissions.

- The plant struggles to meet net-zero targets by 2050 without significant technological breakthroughs or changes in policy.
- Gazzola faces increasing regulatory pressure and reputational risks as competitors adopt greener technologies and attract more sustainability-focused clients.

#### 4. Scenario 4: Transformational Policy and Market Shift (High Ambition)

- Assumptions:
  - Canada implements aggressive climate policies, including carbon pricing at \$150/ton CO<sub>2</sub>, and enforces net-zero emissions regulations across all sectors.
  - The construction industry shifts rapidly toward sustainability, with government incentives for green infrastructure projects.
  - Gazzola adopts all available low-carbon technologies, including advanced carbon capture, 100% renewable electricity, and significant use of bio-based asphalt binders.
  - The plant pioneers the use of hydrogen-powered equipment for asphalt production and logistics.
- Outcome:
  - Gazzola achieves carbon neutrality by 2050 due to proactive investments in clean technologies, carbon offsets, and large-scale adoption of renewable energy.
  - The company gains a leading market share in the green construction sector and attracts significant private and public-sector contracts.

#### Step 5: Strategic Recommendations

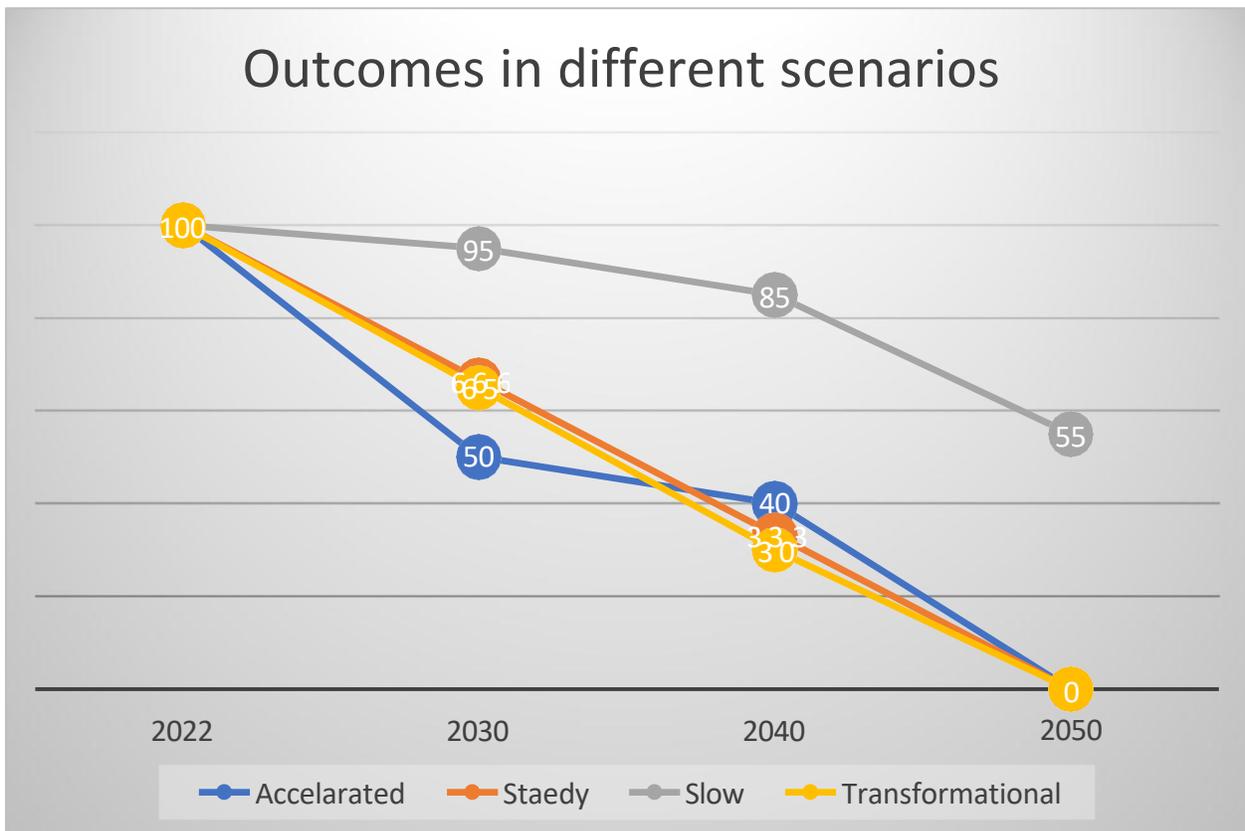
Based on the scenarios, Gazzola should prioritize the following strategies:

- Invest in renewable energy to reduce reliance on fossil fuels and minimize electricity-related emissions.
- Adopt warm mix asphalt and increase RAP use to reduce production-related emissions.
- Pilot carbon capture and storage technologies to mitigate emissions from the heating process.
- Advocate for stronger climate policies to accelerate market demand for sustainable materials and leverage government incentives.

- Explore partnerships and financing options for the transition to net-zero, including public-private collaborations and green bonds.

Conclusion:

By evaluating different technological pathways, regulatory scenarios, and market conditions, Gazzola can better understand the risks and opportunities in its journey toward net-zero emissions. The Net Zero Technical Guide helps ensure that the plant focuses on the most effective and feasible strategies to reduce emissions and achieve sustainability goals through a high ambition transformational policy and market shift



## 5.5.6 Mitigation

### 5.5.6.1 Mitigation Strategy

#### 1. Energy Efficiency & Process Optimization

- Implement best industry practices and scientific methods to enhance machinery efficiency.
- Install heat recovery systems to capture excess heat from production processes.
- Upgrade electrical systems (e.g., transformers) to regulate energy flow efficiently.
- Cover aggregate stockpiles and monitor moisture levels to reduce drying energy.

#### 2. Fleet Decarbonization – FLEET ZERO

- Transition supervisory vehicles to Chevrolet Silverado EVs for snow operations.
- Retrofit medium-duty trucks with CNG kits and phase in Kenworth T880 CNG trucks.
- Install EV charging infrastructure (Level 2 & Level 3) to support fleet transition.
- Conduct pilot projects for hydrogen dual-fuel, renewable diesel, and CNG.

#### 3. Renewable Energy & Electrification

- Shift to renewable energy-powered equipment across all operations.
- Expand use of low-carbon asphalt technologies.
- Deploy solar PV systems and battery storage to reduce grid dependency.

#### 4. Supply Chain & Scope 3 Reductions

- Collaborate with transportation companies to reduce logistics emissions.
- Implement supplier carbon tracking and reduction goals.
- Optimize material use and increase recycled asphalt content in production.

### 5.5.6.2 Mitigation Table with Target

## Mitigation Table: Net-Zero Challenge Roadmap

Category	Action	Scope	Target Reduction	Timeline
<b>Energy Efficiency</b>	Implement heat recovery systems	Scope 1	10%	2025–2030
	Regulate energy flow with electrical upgrades	Scope 1	5%	2026–2030
<b>Fleet Decarbonization</b>	Convert fleet to EV & CNG trucks	Scope 1	20%	2025–2035
	Install EV charging infrastructure	Scope 1	5%	2026–2035
	Pilot hydrogen and renewable diesel	Scope 1	10%	2026–2035
<b>Renewable Energy</b>	Shift to 100% renewable energy	Scope 2	15%	2025–2045
<b>Supply Chain (Scope 3)</b>	Set supplier carbon reduction targets	Scope 3	10%	2025–2050
	Optimize logistics & transport emissions	Scope 3	10%	2025–2040
	Increase recycled asphalt content	Scope 3	5%	2025–2040
<b>Carbon Capture</b>	Explore CCS & nature-based offsets	Scope 1-3	10%	2035–2050

## 6. Noise Management

Gazzola with the help of RMG Consulting Group Inc. has conducted a full Plant Noise Assessment to ensure we are providing the best direction to employees around proper ear protection requirements and to make sure we remain in compliance with the noise emissions limits set out in the Ministry Publication NPC-300 for Industrial Properties.

Sound was sampled from 12 different areas around the plant. This gives an in depth and accurate look into noise exposure averages in the asphalt plant. The findings are based on noise samples taken during the day on July 26th, 2022. The samples were taken at various times during the working hours from 12 different vital points around the plant where work is being performed. OHS & Regs set legal limits on noise exposure in the workplace. These limits are based on a worker's time weighted average over an 8-hour day. With noise, maximum allowed sound level is 85 dBA for all workers for an 8-hour day.

The following procedure was followed for all the noise measurements:

- Prior to the initial data collection and at the end of the measurement day, the dBA reading system was calibrated with the Reed SC-05.
- With the use of the calibrator, the acoustic sensitivity of the sound level meter was checked immediately before and after each series of sound measurements, and the results were discarded if the two levels did not coincide to within 1.0 dB.
- The ambient noise levels, with the SLM impulse integration option on, were measured by sampling the sound level at each point for a minimum of 15 minutes per point and sub-period.
- All extraneous factors that may influence the measurement were noted and excluded from the measurements

The full methodology and balance of the Gazzola Paving 345 Attwell Drive site report can be found within the Occupational Noise Measurement Testing completed on July 26, 2022.

Area 1 – Muster Point (Entrance)

*Results*

Decibel readings taken from 900 sound samples equaled out to an average of 78.67 dB

	Exposure Time	TWA
Totals	08:00	78.67



Area 2 – Northwest Corner

Results

Decibel readings taken from 900 sound samples equaled out to an average of 79.07 dB

	Exposure Time	TWA
Totals	08:00	79.07



Area 3 – Ticket Office (Scale house)

Results

Decibel readings taken from 900 sound samples equaled out to an average of 81.51 dB

	Exposure Time	TWA
Totals	08:00	81.51



Area 4 – Conveyors Area

Results

Decibel readings taken from 900 sound samples equaled out to an average of 87.71 dB

	Exposure Time	TWA
Totals	08:00	87.71



Area 5 – North Aggregate Laneway

Results

Decibel readings taken from 900 sound samples equaled out to an average of 74.88 dB

	Exposure Time	TWA
Totals	08:00	74.88



Area 6 – Tri-Conveyor Passage

Results

Decibel readings taken from 900 sound samples equaled out to an average of 83.65 dB

	Exposure Time	TWA
Totals	08:00	83.65



## Area 7 – North Loader Ramp

### Results

Decibel readings taken from 900 sound samples equaled out to an average of 84.21 dB

	Exposure Time	TWA
Totals	08:00	84.21



Area 8 – Northeast Corner

Results

Decibel readings taken from 900 sound samples equaled out to an average of 72.27 dB

	Exposure Time	TWA
Totals	08:00	72.27



Area 9 – Hilltop

Results

Decibel readings taken from 900 sound samples equaled out to an average of 68.74 dB

	Exposure Time	TWA
Totals	08:00	68.74



## Area 10 – Asphalt Lab

### Results

Decibel readings taken from 900 sound samples equaled out to an average of 65.58 dB

	Exposure Time	TWA
Totals	08:00	65.58



Area 11 – Mobile Crusher

Results

Decibel readings taken from 900 sound samples equaled out to an average of 94.36 dB

	Exposure Time	TWA
Totals	08:00	94.36



Area 12 – Plant Office

Results

Decibel readings taken from 900 sound samples equaled out to an average of 64.10 dB

	Exposure Time	TWA
Totals	08:00	64.10



## 7. Efficient Plant Operation Plan

Plant Operations follows strict Annual and Daily Checklists prior to operation to ensure Gazzola is following the Ontario Hot Mix Producers Environmental Best Practices Guide based on latest guidance from the Ontario Ministry of the Environment.

Our Plant Operation General Manager maintains a log to ensure any signs of the plant running inefficiently are logged and repaired before production begins:

Monthly Checklist includes the following completed and logged prior to production:

<b>Checklist for Plant Yard</b>		
Plant yard paved areas maintained clean and dust free.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Unpaved yard areas treated regularly with water or other environmentally friendly suppressant.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Efficiently designed traffic patterns enforced.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Vehicle speeds in yard enforced to minimize dust generation.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Comments:	_____	
	_____	
	_____	

### Checklist for Aggregate Delivery/Stockpiling

- Ensure vehicles delivering aggregates are tarped.  Yes  No
- Fine aggregate piles protected from wind by coarse piles.  Yes  No
- Plant stockpiles located as close as possible to cold feed bins.  Yes  No
- Plant stockpiles covered or treated with water or suitable wetting agent when material is especially dusty or when required by wind conditions.  Yes  No

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### Checklist for Material Transfer

- Hydrated lime storage silos ventilation filter and vent valve working.  Yes  No
- Inspect elevator housing and plant tower for cracks and holes. Repair as required.  Yes  No
- Inspect seal at connections between elevator and screens. Repair or correct as needed.  Yes  No
- Inspect rubbing-type seals at the connection to the dryer/collection system. Repair or correct as needed.  Yes  No
- Inspect discharge valves, ducts and seals around dryer intake. Repair or replace, as required.  Yes  No
- (Batch Plants) Purging or draining for change in mix has dust creation minimized.  Yes  No

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### Checklist for Cyclone / Duct Work

- Are all joints sealed and airtight in the duct work?  Yes  No
- Are any holes present in duct work or cyclone?  Yes  No
- Is there any damage or wear to internal cyclone components?  
(i.e. outlet tube or liners?)  Yes  No
- Is any of the duct work thin or worn?  Yes  No
- Are cyclone and all duct work free from dust build-up or  
caking?  Yes  No
- Are all rotary air locks and/or tipping valve adjusted and  
operating properly?  Yes  No

If you answer No to any item, please provide details below

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### Checklist for Exhaust Fan

- Are fan belts adjusted to the proper tension?  Yes  No
- Are sheaves properly aligned and in good repair?  Yes  No
- Is there any dust build-up on the fan impeller or internal fan  
housing?  Yes  No
- Is fan balanced and running smoothly?  Yes  No
- Are there any cracks / holes in the fan impeller (very dangerous -  
fix immediately).  Yes  No
- Are there any signs of abrasive wear on the impeller?  Yes  No

If you answer No to any item, please provide details.

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### Checklist for Damper

- Is damper modulating motor functioning properly?  Yes  No
- Are the damper linkages intact and lubricated?  Yes  No
- Are the pressure sensors that actuate the damper functioning properly?  Yes  No
- Are the blades of damper showing any signs of abrasive wear?  Yes  No

If you answer No to any item, please provide details.

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### Checklist for Air Seals: Dryer, Duct Work, and Fugitive Emission Systems

- Are Front and rear drums seals in working order?  Yes  No
- Check and maintain flanges at interconnecting equipment.  Yes  No
- Are all bag house seals in good working order?  Yes  No
- Are seals at access points functioning properly?  Yes  No
- Are joint seals on the fugitive emission system operating as specified?  Yes  No
- Are seals at recycling collar and gate functioning as specified?  Yes  No
- Are there signs of wear on the exhaust fan?  Yes  No
- Are fan bearings in good working order?  Yes  No
- Are drive belts in good working order?  Yes  No

Comments: \_\_\_\_\_

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## Checklist for Burner Operation

- Check fuel valves for leaks.  Yes  No
- Inspect and ensure linkages are in proper adjustment.  Yes  No
- Lubricate moving parts.  Yes  No
- Check nozzle for foreign materials to ensure proper flow of fuel.  Yes  No
- Are filters and strainers in clean working order as per manufacturer's recommendations?  Yes  No
- Are thermocouples couplers functioning properly?  Yes  No

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Checklist includes the following completed and logged prior to production:

## Checklist for Baghouse

- Is baghouse preheated before start-up?  Yes  No
- Is baghouse operated above dew point 121° C (250° F)?  Yes  No
- Is the baghouse high temperature protection device operating properly?  Yes  No
- Is the high temperature set point set 50° F below the high operating temperature of the filter fabric?  Yes  No
- Are all plant pressure sensing devices operating properly?  Yes  No
- Are all thermocouples operating properly?  Yes  No
- Are there any leaks in the shell of the baghouse? Or around any door seals?  Yes  No
- Is the clean air cycle time set to clean the bags only as, and when, needed?  Yes  No
- Inspect the baghouse bag:  
a) Are all bag seals intact?  Yes  No  
b) Is any dust present in this area?  Yes  No
- Inspect bag with black light inspection system. Are there any indications of bag failure?  Yes  No
- Are air jets properly aligned in the center of the bag aiming straight down into the bag?  Yes  No

If you answer No to any item, please provide details below.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## Checklist for Site Management of Waste

Are environmentally-friendly (non-solvent) truck box release agents and asphalt cleaners used exclusively?  Yes  No

*If no, action should be taken to eliminate release agents such as diesel fuel.*

Are asphalt cement and fuel storage tanks located according to Fuel Safety Branch regulations (Ministry of Labour) with appropriate containment systems?  Yes  No

*If no, action should be taken to ensure compliance with Provincial regulations and site management practices.*

Are procedures and materials in place to clean up asphalt cement or fuel spills immediately?  Yes  No

Use sand to absorb spills prior to removal.

*If no, materials such as sand or other environmental acceptable absorbent products should be made available as part of the site management plan and spill response procedures.*

Are there dedicated vehicle maintenance areas on site with containment systems to address the collection, storage and disposal of waste oil and lubricants?  Yes  No

*If no, site management activities should be amended to eliminate the risk of surface oil and grease contamination. Waste oil should be collected and stored in a proper container and disposed of through a licensed disposal firm.*

Does the site management plan include maintenance logs for company vehicles and equipment and periodic in-house inspections to identify problem areas with respect to lubricant leakage?  Yes  No

*If no, site management documentation requirements should be amended to include vehicle/equipment maintenance data.*

Are laboratory solvents and chemicals recycled?  Yes  No

*If no and recycling is not undertaken, the method of off-site disposal for used materials should be outlined in the site management plan and should meet Ministry of Environment regulations.*

## 7. Dust Control Management Plan

Along with Gazzola’s Silica Hazard Program designed to reduce dust exposure from construction work to help keep our personnel safe on the job, our Dust Control Management plan attempts to keep airborne dust to a minimum and when it is found quickly remediate the issue.

As it can be expected, dust control is a daily activity at an asphalt plant. Material, temperature, wind and traffic all play a part in the amount of dust circulating at the asphalt plant.

Daily the Asphalt Plant General Manager is to document where dust is present and give Pass or Fail grades to these operational areas. Once identified work begins to identify appropriate actions that can be taken to stop:

**Gazzola Paving Limited**  
**Best Management Practices Plan for the Control of Fugitive Dust Emissions**  
**DAILY DUST INSPECTION CHECKLIST - HMA PLANT AND AGGREGATE DEPOT**

**PASS** *No significant fugitive dust on-site and no visible dust moving off-site.*  
 **FAIL** *Lots of dust on-site and fugitive dust migrating off-site. Corrective action required. Record in "Corrective Actions".*

When the Daily Inspection identifies a dust issue, the actions taken to fix the issue are logged in this report.

DATE	ON-SITE TRAFFIC	ON-SITE PAVED ROADS/ AREAS	ON-SITE UNPAVED ROADS/ AREAS	AGGREGATE STOCKPILES	LOADING UNLOADING TECHNIQUES	MATERIAL SPILLS	MATERIAL CONVEYANCE SYSTEMS	COMMENTS/ACTIONS
Preventative measures/procedures include but are not limited to the following:								
								• Sweeping of paved roads and area
								• Flushing/watering of pave roads and areas
								• Application of alternative dust controls eg. Calcium chloride or magnesium chloride (preferred)

1 - DRIVERS CAUSING FUGITIVE DUST EMISSIONS AS A RESULT OF NOT OBEYING SPEED LIMITS AND TRAFFIC ROUTES WILL BE CAUTIONED AND DIRECTED TO OBSERVE THE SIGNAGE AT THE SITE ENTRANCE. IF THE ISSUE IS NOT RESOLVED, THE GENERAL MANAGER OR DESIGNATE MUST ESCALATE THE ISSUE TO GAZZOLA MANAGEMENT.  
 2 - HEAVY DIRT BUILD-UP AND DAMAGE TO PAVED AREAS SHOULD BE NOTED IN THE COMMENTS SECTION AND ADDRESSED PROMPTLY.  
 3 - LOOSE AND/OR VERY DRY MATERIAL ON THE ELEVATED ROAD SHOULD BE NOTED IN THE COMMENTS SECTION AND ADDRESSED PROMPTLY.  
 4 - CHECK TO MAKE SURE THAT THE OPERATIONS ARE TRYING TO LIMIT THE DISTURBED AREA OF THE STOCKPILES; PAY PARTICULAR ATTENTION TO THE POTENTIAL AREAS IN VERY DRY, WINDY CONDITION  
 5 - CHECK TO MAKE SURE OPERATORS ARE TRYING TO MINIMIZE THE HEIGHT THROUGH WHICH MATERIALS ARE BEING DROPPED.  
 6 - AGGREGATE SPILLS SHOULD BE CLEANED UP AS QUICKLY AS POSSIBLE ESPECIALLY IF THEY COULD LEAD TO A DUST EVENT, FOR EXAMPLE IF THEY ARE LEFT IN THE MIDDLE OF THE ROAD.  
 7 - MAKE SURE THAT MATERIAL IS NOT SPILLING OFF OF AGGREGATE CONVEYORS; PAY PARTICULAR ATTENTION TO THE POTENTIAL OF DUST BLOWING OFF OF THE CONVEYORS IN VERY DRY, WINDY.

Gazzola Paving Limited  
Best Management Practices Plan for the Control of Fugitive Dust Emissions

PERIOD ACTIVITIES - HMA PLANT AND AGGREGATE DEPOT

NAME	DATE	START TIME	END TIME	DESCRIPTION OF PREVENTATIVE MEASURE/PROCEDURE	COMMENTS

**PERIODIC ACTIVITIES INCLUDE:**

*Sweeping paved roads and areas*

*Flushing/watering paved roads and areas*

*Application of alternative dust controls eg. Calcium chloride or magnesium chloride*

Management reviews the weekly Dust Control Logs and the periodic activities undertaken to ensure actions are being taken fast enough to eliminate the issue and ensure it happens less if at all in the future.

Records of these actions are kept offsite in storage for 7 years.

Along with period fence line monitoring completed by Gazzola, having a way for our neighbours to raise an issue immediately to our Plant Operations General Manager is crucial. Complaints from neighbours are recorded and proactively submitted to the Ontario Ministry of the Environment.

# Complaint Response Form

Source of Complaint \_\_\_\_\_

Date \_\_\_\_\_ Time \_\_\_\_\_

## Nature of Complaint

- Odour                       Noise                       Particulate Emission  
 Gaseous Emission       Groundwater Preservation       Waste

**Give Specific Details of Complaint** \_\_\_\_\_

## Plant/Production Information

Plant Type:             Batch             Drum             Other

Mix Type:             HL Mix             RAP Mix             Other

Asphalt Cement type/grade \_\_\_\_\_

Additives \_\_\_\_\_

If RAP mix, note percentage of recycled material \_\_\_\_\_

## Environmental Data

Air Temperature \_\_\_\_\_

Wind Speed \_\_\_\_\_ Wind Direction \_\_\_\_\_

- Sunshine                       Overcast                       Rain

Identify suspected source of problem \_\_\_\_\_

Identify measures taken to resolve complaint \_\_\_\_\_

Identify measures taken to follow up with complaint \_\_\_\_\_

Other Comments \_\_\_\_\_

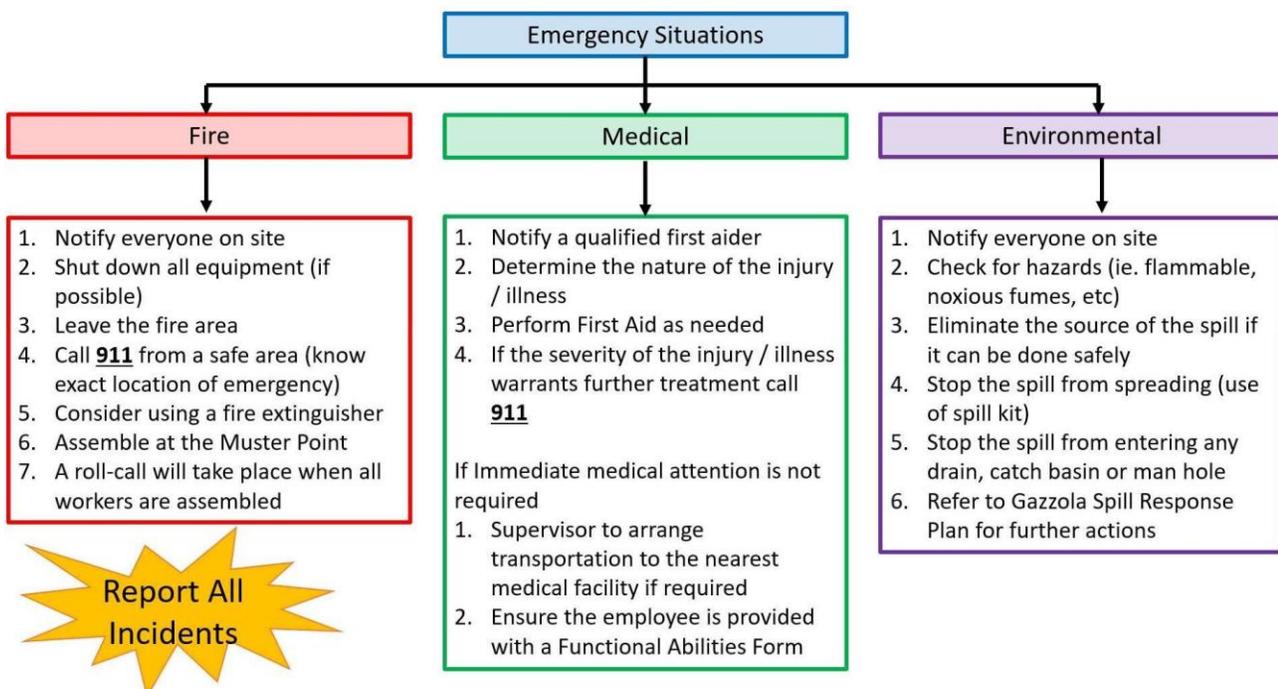
**Form Completed by** \_\_\_\_\_ **Date** \_\_\_\_\_

**Signature** \_\_\_\_\_

**Date Submitted to MOE** \_\_\_\_\_

## 8. Health and Safety

### 8.1 Emergency Response Plan



## 8.2 Site Response

#1 on every list is to notify others. Gazzola Paving has the 3-LONG-HONKS warning system in place.

- 3-LONG-HONKS means
  1. Press the horn for 5 seconds, wait for 3 seconds,
  2. press the horn for 5 seconds, wait for 3 seconds,
  3. press the horn for 5 seconds
- The 3-LONG-HONKS emergency warning system is not to be confused with the 2-SHORT-HONKS procedure to be done before reversing equipment
- Please do not use 3-LONG-HONKS for anything other than notifying others of an emergency

If you are not on a piece of equipment, you can notify others by using

- Your voice (ex. Yelling for help)
- Your actions (ex. Hand signals indicating for someone or a piece of equipment to stop)
- Your cell phone (ex. Calling 911, Superintendent, Foreman, co-workers, H&S Coordinator, etc.)

Emergencies are something that you need to be prepared for and know how to react to quickly, effectively and safely. Please ask any questions you may have to ensure you are well prepared if an emergency were to occur.

### 8.3 Guide to Emergencies Within Facilities

#### Emergency Personnel

Emergency Response Coordinator (ERC): GREG HARBIN\_

Alternate: *NICK HOWARD (NIGHT OPERATIONS ONLY)*

#### Team Contacts

Name	Cell #	Company Name
Greg Harbin	416-936-1614	Gazzola
Nick Howard	647-785-5642	Gazzola

#### Grouping Areas

Area 1: NORTH SIDE OF DRIVEWAY ENTRANCE AT GREY SHED

#### Types of Emergencies

Emergency Evacuation

Fire and Explosion

Medical Emergency

Chemical Spills

Emergency Violence Response

Inclement Weather

Overhead Powerline Contact

#### 8.4 EMERGENCY CONTACT LIST

In case of emergency: please contact the first person on the list below. If you are unable to reach that person, leave a message and contact the next person on the list below. Do so until you have spoken to someone and informed them of the emergency situation.

Employee Name	Position/Title	Phone Number
Virgil Gazzola	General Manager	416-936-1608
Martin Flute	H&S Coordinator	647-580-6590
Sean Stewart	Project Manager	647-622-2153
Vern Gazzola	Vice-President	416-948-1849
Kirk Zavitz	CFO	416-817-0696

#### 8.5 EVACUATION PLAN

*In the event of an emergency situation, we require all employees to respond quickly and calmly and evacuate the facility / buildings to prevent any injuries.*

If You Hear the Emergency Alarm:

- Remain calm.
- Turn off the power to your workspace or equipment if safe to do so.
- Leave the area/ building by the nearest, safe exit.
- Close all doors behind as you leave.
- Proceed directly to designated Staging Area (Meeting Zones)
- Advise your Health and Safety Coordinator member at the meeting zone of any observations or status of other employees.
- Remain calm at the meeting zone and await further instructions from your supervisor or ERC/ERT member.

#### Worker Responsibilities:

- If for any reason the facility / buildings must be evacuated, the employees will be advised by the alarm process or verbally by their supervisor to evacuate.
- All employees must promptly leave the facility by the nearest safe exit as soon as reasonably practicable.
- All employees will meet at the designated staging area or meeting zone for a head count
- Once at the designated staging area or meeting zone, all workers must remain there and not re-enter the facility / buildings for any reason.
- Workers will only be allowed to re-enter the facility / building when it has been deemed safe by the emergency responders.
- Follow directions of the ERC/ERT

#### Supervisors Responsibilities:

- Ensure all workers under your supervision are aware of the requirement to evacuate the facility / buildings.
- Ensure that all subcontractors or truck drivers are aware of the requirement to evacuate the facility / buildings and proceed to staging area or meeting zone.
- Exit the facility / buildings through the nearest safe exit point and proceed directly to the designated staging area or meeting zone.
- Assist in a head count and let the ERC/ERT members know that your workers are accounted for or advise of any missing personnel.
- *Under no circumstances should anyone go looking for missing workers in the building.*
- Provide first aid to injured workers, if trained.
- Follow the directions of the ERC/ERT members or emergency responders.

#### Emergency Response Coordinator / Team Members (ERC / EMT)

- Call emergency responding personnel (911). The phone numbers are posted on Health and Safety Board or in your Emergency Evacuation Package.
- Exit the building through the nearest safe exit point and go directly to the designated staging area or meeting zone you are responsible for.
- Ensure that an employee is assigned to notification all employees in the asphalt lab to make sure employees there have heard the alarm and are proceeding to the staging zone or meeting point.
- Ensure that all entry to the facility is halted (i.e. entrance to asphalt plant is blocked to prevent access to facility).
- Take a headcount and record all names under the Headcount recording form. Communicate with all ERT members and other employees to gather information and confirm head counts.
- ERC will greet the emergency responding personnel when they arrive.
- Provide the emergency responding personnel with specific event information including if any workers are missing or advise the emergency personnel that all are accounted for.
- Take direction from the emergency responding personnel.
- Allow employees to re-enter the building when given the all clear from emergency responding personnel.
- Communicate with other Management personnel to update the status of the Emergency situation.

HEADCOUNT RECORD

*ERC/ERC will take a head count and record each workers name on the list below:*

#	Employee Names	#	Employee Names
1		16	
2		17	
3		18	
4		19	
5		20	
6		21	
7		22	
8		23	
9		24	
10		25	
11		26	
12		27	
13		28	
14		29	
15		30	

## 8.6 FIRE AND EXPLOSIONS

*When you hear the emergency alarm, proceed and follow below:*

### WORKERS

- Initiate evacuation procedure.
- Exit your area through the nearest or alternate emergency exit.
- Close doors behind you.
- Notify the ERC/ERT when you have arrived at the designated staging area or meeting zone.

### SUPERVISORS

- Initiate evacuation procedure.
- Notify ERC/ERT in the designated staging area or meeting zone.
- Assist ERC/ERT member in writing a list of evacuated workers at the designated staging area or meeting zone.
- Await further instruction from ERC or emergency responding personnel.

### ERC and ERT

- Initiate evacuation procedure.
- Call 9-1-1 (or appropriate number for fire) and report fire.
- Give your name, the company name, address, major intersections, entrance to site, area of site and advise that persons will be available outside for direction. Remain on phone until 9-1-1 operator terminates the call, remain near phone.
- Communicate with ERT members to gather emergency information and determine who may have been in the building. Establish phone calls to those may be unaccounted for.
- Communicate with emergency responding personnel throughout the emergency situation.

## MEDICAL EMERGENCIES

### WORKERS

- Notify facility First Aid trained personnel and site management team.
- Initiate evacuation procedure if required.
- Assist if possible and safe to do so.

### *FIRST AIDER*

- Assess the scene to determine personal risks or hazards.
- Assess the victim and wear any Personal Protective Equipment (PPE) for personal protection (gloves, mask).
- Take control of the situation and maintain a calm environment.
- Administer first aid if safe to do so.
- Do not move ill or injured person(s), unless it is essential for their safety. Try to make them comfortable.
- Send a worker to notify Facility Management and ERC.
- Direct a worker or the ERC to direct ambulance where the medical emergency is occurring.
- Have someone call 911 if the situation dictates.

### For Serious Injury/Illness:

- Notify ERC or facility management as soon as possible.
- ERC or facility management to call 9-1-1 as soon as possible.
- Give your name, the company name, address, major intersections, entrance to site, area of site and advise that persons will be available outside for direction. Remain on phone until 9-1-1 operator terminates the call, remain near phone.
- ERC/ERT member to clear immediate area and direct coworkers to safe place and maintain a calm environment.

- ERC to direct ambulance and other emergency responding personnel to location of emergency situation.
- Secure scene for investigation.

## 8.7 HAZARDOUS MATERIALS ACCIDENTS AND SPILLS

*Any spill or leak of a chemical must be treated as being a potential hazardous material incident until the chemical can be identified. If the magnitude of the incident is determined to be of serious concern, initiate the evacuation procedures and call 911.*

### WORKERS AND SUPERVISORS

- Initiate evacuation procedure if required.
- If evacuation procedure are not required, notify ERC or facility management as soon as possible.
- Determine the name of the spilled or leaking chemical or material from the label on the container or from the shipping manifest or invoice.
- Initiate cleanup of material if safe to do so.
- If during the cleanup of the hazardous material, any worker shows signs or symptoms of distress, immediately remove the individual to a safe location and call 911 for further assistance.

### *ERC/ERT Members*

- ERC/ERT to assess hazards at the scene and establish the magnitude of the incident.
- ERC/ERT to identify hazard (review MSDS, containers, etc.).
- ERC/ERT to initiate evacuation procedures and call Emergency Services (911)

## 8.8 SPILL EMERGENCY PROCEDURE

When projects are prepared for chemical spills, fewer errors are made and there is a reduced risk to persons, property and the environment. The essential elements of spill response preparation are; training, hazard information, PPE and written procedures as described below.

### Training

Spill response training is provided by the Health and Safety Team to Supervisors and workers. All employees will complete WHMIS prior to commencing work and complete annual refresher training.

### Hazard Information

Information on the chemical hazards present at the project shall be kept up-to-date and readily available. Sources of information include the SDS, signs, container labels, posters, and reference books. SDS's will be kept on adjacent to hazardous substances at all times, at an easily assessable location.

### Workers

- Proceed with caution and advise others that are in the immediate area of the spill of the potential danger.
- If persons are injured, provide first-aid if the scene is secured and you are trained to do so.
- If the spilled chemical has contaminated persons, lead them to the nearest eyewash or emergency shower and assist in washing off the material. However, do not put yourself at risk and become a casualty.
- Notify Supervisor on the site.
- Minor spills or spills of chemicals of low toxicity and/or volatility can be handled by employees at the location.
- If the nature, quantity or location of the spill exceeds the capacity of departmental personnel to deal with it safely and effectively, then outside help shall be requested by contacting the Health and Safety Team.

### Spill Clean-up Response

Project Managers are responsible for ensuring that an adequate supply of spill response equipment is maintained at each project location. The Spill Kits will be customized to account for specific hazards and conditions on each location.

The equipment required includes:

- first-aid equipment
- personal protective equipment
- spill cleanup supplies.

### Minor Spill

A minor spill is one that usually presents little or no hazard to person or property and is small enough to be safely cleaned up using the emergency spill kit.

1. Notify all personnel and supervisor in the vicinity of spill or any flammable, toxic, volatile material, etc.
2. Evacuate and post warnings
3. Remove contaminated clothing and enter emergency shower, flush eyes for 15 minutes. Be sure chemical is unreactive with water.
4. Obtain information about name of chemical, approximate quantity, hazards of the chemical (review SDS if available)
5. If is safe to do perform clean up procedures. If clean up materials are not available call Emergency Services.
6. Wear PPE
7. Use a spill control material to contain the spill and move it into a container and removed to a temporary storage area off the site area until disposal has been arranged.
8. Wash the affected area and PPE with appropriate cleaning solution

9. Fill out Incident Report Form

### Major Spill

A major spill is one that cannot be contained safely with the materials on the site, threatens safety to life, and/or threatens to enter the sewer system or travel beyond the boundaries of building/property to endanger the environment. The Emergency Services shall be contact.

1. Notify all personnel and supervisor
2. Post warnings
3. Evacuate immediate area
4. Call Emergency Services
5. State your name, location, chemical(s) involved, and the amount spilled
6. Attend to any persons who may have been contaminated. Refer to SDS for first aid information
7. Wait in a safe area for the emergency service team
8. Do not allow unauthorized person to enter the contaminated area
9. Fill out the Incident Report Form

## 8.9 EMERGENCY VIOLENCE RESPONSE

*If you observe or are notified of a person(s) in possession of a weapon, forcing entry into the building, or appear to be acting in an extremely aggressive manner, the following steps should be followed:*

### *WORKERS AND SUPERVISORS*

- Do not confront the individual.
- Initiate evacuation procedure immediately.
- Call 911 immediately.
- Contact the facility manager/ERC as soon as possible.

### *ERC/ERT Members*

- Do not confront the individual.
- Initiate evacuation procedure immediately.
- Call 911 immediately.
- Inform arriving emergency responding personnel of details known to this point.

## 8.10 INCLEMENT WEATHER EMERGENCY RESPONSE PROCEDURE

Inclement weather shall mean the existence of rain or abnormal climatic conditions (whether they be those of hail, snow, cold, high wind, severe dust storm, extreme high temperature or the like or any combination thereof) by virtue of which it is either not reasonable or not safe for employees exposed thereto to continue working whilst the same prevail. Inclement weather conditions include but are not limited to:

- Tornado
- Wind storm
- Thunder storm and/or lightning
- Snow/ice storm
- Flood

Response to a weather emergency may be based on:

- A warning from a local environmental authority
- Media forecast
- Signs of an upcoming weather emergency

A decision on activating the Inclement Weather Emergency Response Procedure shall be made by the Health and Safety Team and can be based upon the following factors:

- Type of forecast conditions (e.g. wind, snow, ice)
- Severity of forecast condition
- Reliability of the forecast
- Feasibility of continued operation
- Type of work which is taking place
- Traffic and roadway conditions in the surrounding vicinity.

Construction projects shall be secured in response to an inclement weather emergency. Precautionary measures include but are not limited to the following:

- Loose debris shall be tied down and secured
- Electrical equipment shall be covered from exposure to the weather
- Loose tools, material and equipment shall be properly stored and secured
- When material and equipment are covered with tarps; tarps are to be securely tied down
- Scaffolding shall be secured
- Crane operations shall be suspended, and crane equipment shall be secured
- Construction fences and barricades shall be braced and secured.

## In Case of Emergency

Fire, Police, Ambulance	9-1-1
Ministry of Labour	1 - 877 - 202 - 0008
Hydro	
Toronto Hydro	416 - 542 - 8000
Hydro One	1 - 800 - 434 - 1235
Telephone (Bell)	416 - 310 - 2355
Toronto Sewer / Water	416 - 338 - 8888
CANUTEC	613 - 996 - 6666 (call collect) or *666
M.O.E. Spills Action Centre	1 - 800 - 268 - 6060
Nearest Hospital E.R.	William Osler  101 Humber College Blvd, Etobicoke
Gazzola H&S Coordinator	416 - 527 - 0125 (Cell)
Gazzola Office	416 - 675 - 7007
Alternate Contact	416 - 294 - 2282 (Cell)

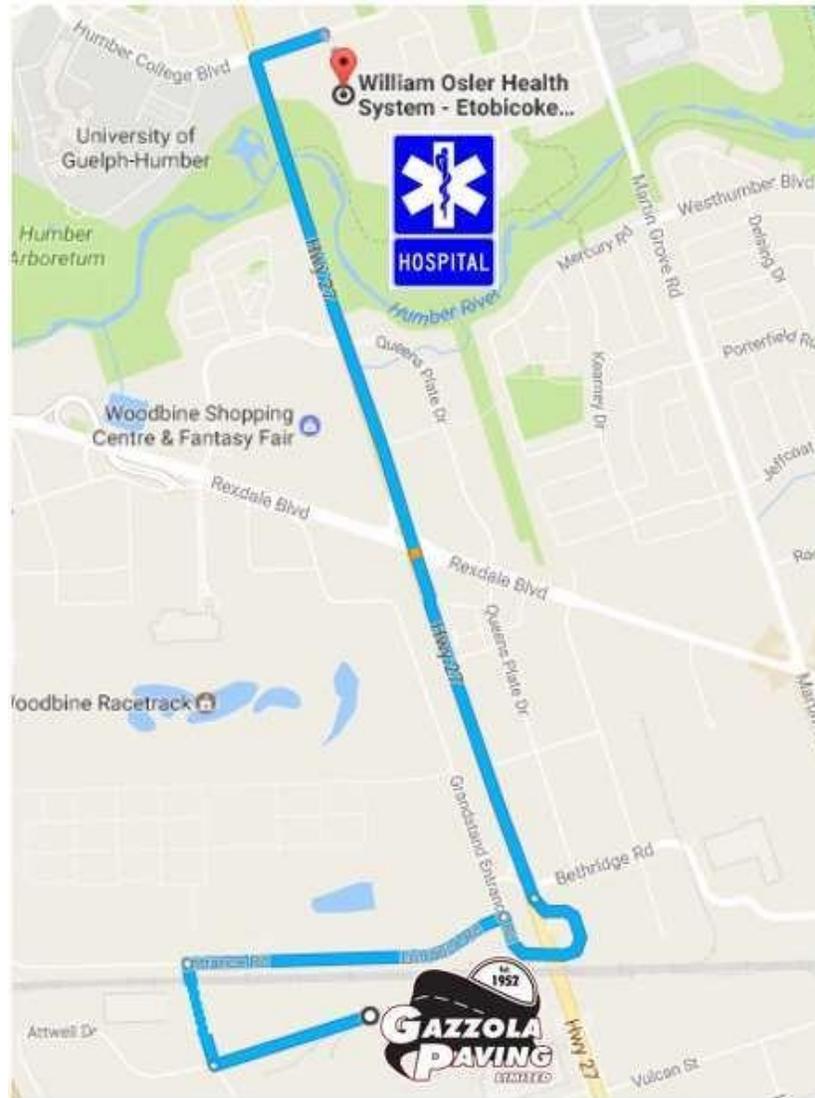


Nearest Hospital Emergency Room:

Etobicoke General Hospital

101 Humber College Blvd., Etobicoke

416-494-2120



Directions:

1. Head west on Attwell Dr toward Carlingview Dr
2. Turn right at the 1st cross street onto Carlingview Dr
3. Turn right onto Entrance Rd
4. Turn right onto Grandstand Entrance Rd

5. Slight right onto Hwy 27
6. Turn right onto Humber College Blvd

#### Employee Training

Gazzola is committed to ensuring its Asphalt Plant employees are trained on all aspects of the Environment Management Best Practices Plan. Training is conducted annually at the start of every season for every employee. Job Hazard GAZZ Assessments are completed daily to remind the team of any issues observed and the weekly Tailgate Talks serve to remind employees of areas of opportunity that need to be corrected in the

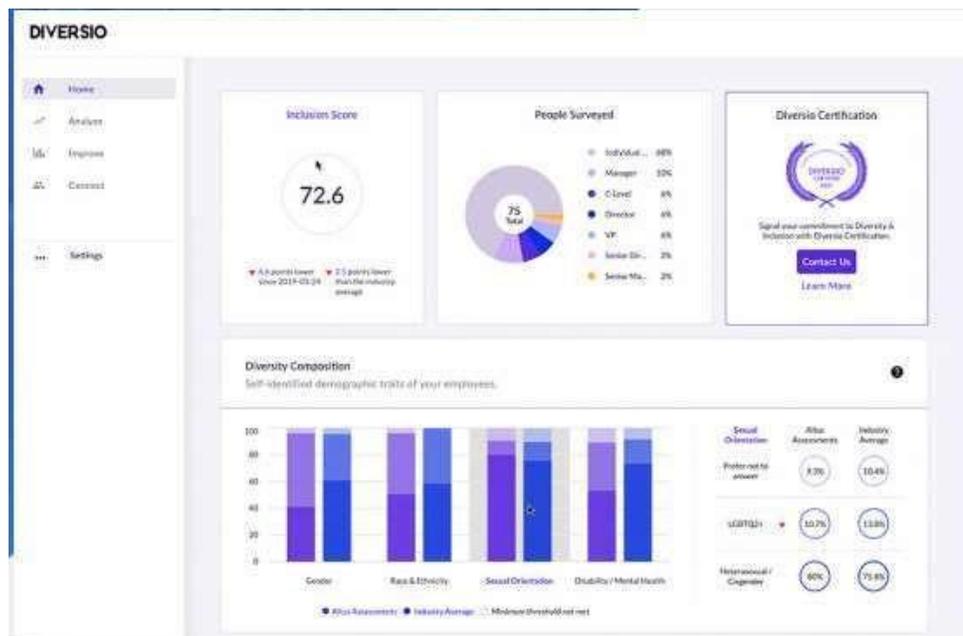
## 9. Diversity and Social Responsibility

### 9.1 Gazzola Paving Limited Diversity & Social Responsibility Commitment

Gazzola is committed to this journey to become an even more diverse and inclusive employer. We strive to be a best-in-class organization by not only demonstrating a diverse and inclusive culture, but by actively supporting inclusive businesses in our supply chain that are making equal efforts to continually improve.

To succeed in becoming more diverse, and to allow us to properly set appropriate KPI targets and establish a diversity baseline, Gazzola will move into year two of our partnership with Diversio to aid in measurement of our current employee impressions and help us with a plan to augment our scores to become more diverse and more inclusive.

We are proud that in January 2024 we received our first Bronze Certification from Diversio.



With many moving pieces to an effective ESG Policy, Gazzola recognizes total perfection can never be achieved but with the ownership group and management commitment to continual improvement of the key elements we can control we can always improve in the journey to be a better employer, business partner, neighbour and corporate citizen.

## 9.2 Building an IHSA COR Certified Health & Safety Culture

Gazzola is committed to delivering world-class performance in Health and Safety and Environmental Management across all operations.

Gazzola maintains its own Health and Safety Department tasked with guiding and overseeing the compliance of company-wide policies and continually enhancing our IHSA COR Certification Program



### GAZZOLA PAVING LIMITED Health & Safety Policy

Gazzola field employees receive three safety orientations per year, a pre-season, a midseason refresher and a winter season.

Weekly Safety Talks are sent out company-wide by the Health and Safety Manager.

Industry-specific Topics of concern are put forward to each regional office and employee.

Daily toolbox discussions are held on every jobsite and acknowledged by each employee.

COVID-19 Policy remains at the forefront of the Executive and Management Teams focus, mandating vaccination for all employees.

Migrating Health & Safety tasks to digital is priority to reduce workloads on employees and improve real-time reporting of results

At Gazzola Paving Limited we place the utmost importance on the health, safety and well-being of our employees. Senior management recognizes the right of workers to work in a safe and healthy work environment, taking every reasonable precaution for the protection of workers in the workplace. To demonstrate this commitment Gazzola Paving Limited has established the corporate goal of maintaining a safe and healthy workplace. Gazzola Paving Limited Senior Management is committed to continuous monitoring of health & safety performance, setting and review health & safety objectives regularly to achieve continual improvement of the Health & Safety Management System.

The Occupational Health and Safety Act and Regulations, the provincial legislation applicable in our operations, is an important piece of legislation that sets the standards for occupational health and safety in the province of Ontario. Gazzola Paving Limited is committed to meeting or exceeding all of the regulations, duties, and the standards set by the Occupational Health and Safety Act.

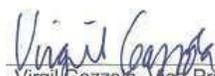
The Occupational Health and Safety Act is founded upon the Internal Responsibility System. This is a system based upon the overlapping and concurrent duties, noted below, of corporations, officers, directors, managers, supervisors and workers. At each level of our organization the employer, managers, supervisors and workers must understand their duties and responsibilities identified on the health and safety program and work in full compliance with the Occupational Health and Safety Act and the applicable regulations.

Specifically, Gazzola Paving Limited as employer, is ultimately responsible for worker health and safety. The management of Gazzola Paving Limited is committed to, and promises that every reasonable precaution will be taken for the protection of the workers.

Supervisors are responsible for the health and safety of workers under their supervision and are responsible to ensure machinery, equipment and personal protective devices are safe, and in compliance with established safe practices and procedures. Supervisors will also provide employees with adequate introduction and training programs so that all Gazzola Paving Limited employees are qualified to do their job safely.

Every employee shall use safe work practices on all assignments, work in compliance with the law, and work with established policies and procedures regarding health and safety. We encourage every employee to not only be concerned about their own occupational health and safety, but also to ensure healthy and safe work practices on the part of their co-workers. We recognize the worker's responsibility to report all hazards and unsafe acts/conditions and forbid reprisals against workers fulfilling their responsibility.

The continued success of Gazzola Paving Limited is dependent upon our long standing professional reputation for providing quality products and services in a safe and timely manner. We ask you to do your part and work together with your fellow employees and management in complying with the objectives of our corporate health and safety policies and the provisions of the Occupational Health and Safety Act. Gazzola Paving Limited seeks to encourage a cooperative attitude and approach to health and safety in the workplace by all persons. Maintaining effective communications, a proactive, consultative and cooperative approach to health and safety by workers, superintendents, foremen, management, worker health and safety representatives and outside parties will ensure that our objectives of maintaining a workplace free from hazards, injury and illness can be achieved.

  
Virgil Gazzola, Vice-President

March 5, 2024  
Date

2024 Health & Safety Action Plan					
Item	Objective	Action	Resource	by	Target Date
1	On-going goal of improving Health and Safety Reporting and Tracking	Continue rolling-out all of our site safety forms electronically on 4S for easier reporting and tracking	Meetings & Communication between Gazzola's H&S Department & 4S	H&S Department	June 2024
		Improved annual near miss and first aid reporting as a result of electronic reporting	4S electronic H&S Management System	All employees	December 2024
2	Passing COR 2020 Standard Audit	Implement the COR audit corrective action plan items compatible with new COR 2020 standard	COR audit action plan	Management	September 2024
		Conduct and pass our COR internal audit next year using the new COR 2020 Standard	<ul style="list-style-type: none"> <li>• Audit tools</li> <li>• Document review</li> <li>• Site observations</li> <li>• Interviews</li> </ul>	COR Internal Auditor	September 2024
3	Expanding our Hazard Assessment Registry	Objective includes inserting new additions or updates to our Workplace Task Standards (WTS) system that speak to hazards specific to the Asphalt Plant & QC Lab	<ul style="list-style-type: none"> <li>• WTS</li> <li>• Observations &amp; Inspections</li> <li>• JHSC approvals</li> </ul>	H&S Department	December 2024
4	Maintain our Zero critical injury rate	Additional awareness be spent in Orientations, Tailgate Talks and training concerning space and time when working with equipment /vehicle around property and workers on the work sites	4S Online Training	Management	December 2024
		Continue to monitor accident reports for further trends and common caused to allow for effective proactive changes to the Health and Safety system	4S Statistics Reporting	Management	December 2024
		Continue to educate on the importance of Violence and Harassment in the Workplace (through Orientations, Tailgate Talks, Safety Meetings, etc.) with	4S Online Training	Management	December 2024

		an emphasis on mutual respect of one another			
5	Job-site Emergency drill	Perform a emergency drill on a project where Gazzola is the general contractor	Project Crews	H&S Coordinator	August 2024

### 9.3 Promoting and Inclusive and Diverse Workforce

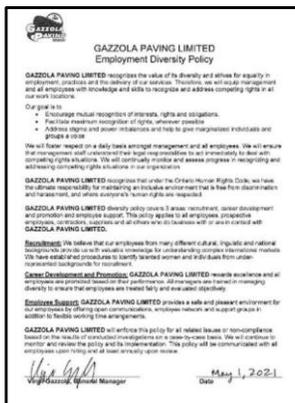
Gazzola Paving Limited recognizes the value of its diversity and strives for gender equality in our employment practices. We make this pledge in recognition that we work in a sector in which groups of employees can sometimes be under represented but that improvements can and should be made to be more inclusive. Our goals are to train all leadership, management and employees to facilitate maximum recognition of rights, wherever possible • Encourage mutual recognition of interests, rights and obligations, and address stigma and power imbalances to help give marginalized individuals and groups a voice. As a leadership team, continually monitor and measure our key Diversity and Inclusion KPIs to improve our Diversity Certification Scores and enhance our certification level. The entire Gazzola Paving Limited leadership team is committed to this journey and pledge we will equip management and all employees with knowledge and skills to recognize and address any imbalances will a goal to ultimately create an even more diverse and inclusive workforce we can be proud of each day.

#### Gazzola's Key Inclusion & Diversity Initiatives



Gazzola is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

[GAZZOLA'S AODA POLICY \(click here\)](#)



Gazzola recognizes that we live in a diverse world and employee diversity should be no different. Gazzola first published an Employee Diversity policy in 2021 and strives for equality in employment practices and the delivery of our services. We are committed to equip management and all employees with knowledge and skills to recognize and address competing rights in all our work locations.

[GAZZOLA'S EMPLOYMENT DIVERSITY POLICY \(click here\)](#)



Gazzola is proud to have first published a Supplier diversity policy in 2021. Every supplier will have an equal opportunity to be included in our product sourcing and procurement process. Certified diverse companies that seek to do business with Gazzola must demonstrate the ability to add value and provide high-quality goods and services that are competitively priced, reliable, and aligned with our superior level of service.

[GAZZOLA'S SUPPLIER DIVERSITY POLICY \(click here\)](#)

We are proud that on January 1, 2022 Vern Gazzola, declared his recognition of the need for a more women in the construction industry at both management levels and in the field, and has proudly signed on to the UN Women Empowerment Principles Pledge and has empowered our leadership team.

Along with our Health & Safety Training the 2022 Spring Orientation we also introduced for the first time to our management and the field, unconscious bias training to provide awareness, promote the right behaviours and ultimately mitigate any potential gender bias, notably in the hiring and recruiting process.

[GAZZOLA'S PLEDGE TO WOMEN'S EMPOWERMENT \(click here\)](#)

**CEO Statement of Support for the Women's Empowerment Principles**

We, business leaders from across the globe, express support for advancing equality between women and men to:

- Bring the broadest pool of talent to our endeavours;
- Further our companies' competitiveness;
- Meet our corporate responsibility and sustainability commitments;
- Model behaviour within our companies that reflects the society we would like for our employees, fellow citizens and families;
- Encourage economic and social conditions that provide opportunities for women and men, girls and boys; and
- Foster sustainable development in the countries in which we operate.

Therefore, we welcome the provisions of the Women's Empowerment Principles – Equality Means Business, produced and disseminated by the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women) and the United Nations Global Compact. The Principles present seven steps that business and other sectors can take to advance and empower women.

Equal treatment of women and men is not just the right thing to do – it is also good for business. The full participation of women in our enterprises and in the larger community makes sound business sense now and in the future. A broad concept of sustainability and corporate responsibility that embraces women's empowerment as a key goal will benefit us all. The seven steps of the Women's Empowerment Principles will help us realize these opportunities.

We encourage business leaders to join us and use the Principles as guidance for actions that we can all take in the workplace, marketplace and community to empower women and benefit our companies and societies: We will strive to use sex-disaggregated data in our sustainability reporting to communicate our progress to our own stakeholders.

CEO Name: VERN PETER GAZZOLA

Name of the company: GAZZOLA PAVING LIMITED

Date: 1/1/2022 CEO Signature: 

\*Please use the latest version of Adobe Acrobat Reader to "fill and sign"

## 9.4 Governance

Policies and procedures are nothing without oversight. Our Leadership team follows a strict governance policy. We maintain ethical standards established for bidding procedures, procurement of subcontractors, material and equipment.

Gazzola utilizes clear internal policies and procedures, modelling institutional governance requirements to assist the ownership group in guiding the business;

Gazzola has introduced for the first time in 2022, an Employee Code of Conduct Policy to go along with our Health & Safety Policies. While an Employee Code of Conduct is not explicitly part of the IHSA COR program, we feel is important to implement improvements and govern our ESP Program at all levels of the organization;

Third parties will continually be retained by Gazzola with expertise around measurement, audit and reporting as required – whether for inclusivity monitoring or financial reporting which will be subject to external audit on a yearly basis.