



Health and Safety Policy Statement

Updated: January 2024

Pure Cycle Corporation is a Colorado-based land and water resource development company committed to the health and safety of its employees and stakeholders, such as business partners (including vendors, contractors, and suppliers) customers, and the public. We believe every person has the right to feel safe in the workplace, and we understand that our operations are reliant on the wellbeing of our employees. This inspires us to achieve and maintain the best possible work conditions and to keep open communication regarding health and safety questions, suggestions, and concerns.

It is our goal to provide and maintain a safe, healthy, and productive workplace by addressing and remediating identified risks that could lead to accidents, injury, or detrimental health impacts. This is a standard we also extend to our vendors, contractors, and suppliers.

Our Health and Safety Policy is overseen by Pure Cycle's Board of Directors. Executive management, including the Principal Executive Officer and Principal Financial and Accounting Officer, oversees the implementation of these policies and coordinates our efforts to identify, address, train, and report on our health and safety risks and opportunities.

Leadership Responsibilities

We designate health and safety responsibilities to competent persons¹ (our health and safety leaders) which elevates our ability to implement an effective health and safety program. They are committed to eliminating hazards, protecting employees, and continuously improving workplace health and safety. Health and safety leaders are responsible for the following:

- Providing sufficient resources (training, standards, protocols, procedures, etc.) to implement and maintain a safe and healthy workplace
- Demonstrating and communicating their health and safety commitment to employees and others
- Setting an example through their own actions

Employee Participation

We understand that employee participation in the development and improvement of our health and safety program is extremely valuable and results in better design, implementation, and evaluation. Employees are encouraged to participate in our open-door policy to discuss health and safety questions, suggestions, and concerns.

¹ Competent Person - one who can identify existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them

In compliance with OSHA Section 11(c), we respect our employee's rights to:

- file a health and safety complaint
- raise health and safety concerns with management or our designated health and safety leaders
- participate in an OSHA inspection
- report any work-related illness or injury

Retaliation against employees is illegal, and we condemn all negative action against employees who exercise their rights.

Site Safety Protocol & Procedures

We acknowledge that ensuring a safe workplace requires adherence to established safety standards, protocol, and procedures. Our safety standards, protocol, and procedures are developed and updated to protect employees from workplace hazards; help avoid injuries, illnesses, and incidents; minimize or eliminate safety and health risks; and help employers provide workers with safe and healthful working conditions. Our safety standards, protocol, and procedures reflect identified and assessed hazards that are present or have been anticipated for our Company's operations.

Safety Education & Training

We recognize that education and training are important tools for informing employees, health and safety leaders, and managers about workplace hazards and controls so they can work safely and be more productive. Training and education materials are provided for each employee in the language(s) and at a literacy level they can understand. Individuals also receive on-the-job training that involves a combination of observing others and hands-on experience completing tasks under the supervision of a health and safety leader. Furthermore, our employees can request additional training for various skills they feel to be relevant or valuable to their position.

Employee safety training occurs upon hire. Additionally, we provide our employees with continuous weekly refresher training. Further safety education and training is provided when necessary.

Records and Documentation

We retain all relevant OSHA records and documentation for the time periods prescribed by the act. The retention of additional records and documents allows us to evaluate the safety of our workplace, understand industry hazards, and implement employee protections to reduce and eliminate hazards – preventing future workplace injuries or illness. Our retained health and safety records and documents include:

- Injury & Illness Forms - OSHA 300, 300A, and 301
- Training Materials
- Training Attendance

OSHA-Recordable Work-Related Incidents	2021	2022	Total To-Date
# of Injuries	0	1	2
# of Near Misses	0	0	0
# of Occupational Diseases	0	0	0
# of Fatalities	0	0	0

Total Recordable Incident Rate (TRIR)*	2021	2022
	0%	2.8%

**OSHA TRIR Formula: (Number of OSHA-recordable injuries and illnesses X 200,000) / Employee hours worked = Total Recordable Incident Rate (TRIR)*