



POLICY

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SUBJECT: SUPPLIER CODE OF CONDUCT

POLICY
SUPPLIER CODE OF CONDUCT
CORPORATE

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1. SCOPE

This Supplier Code of Conduct (the “Code”) applies to suppliers of goods and services, including their representatives and employees (together “suppliers”), to Aecon Group Inc. (“AGI”) or its subsidiaries and their operating divisions and joint ventures (collectively, “Aecon”).

2. PURPOSE

Aecon is committed to conducting business in an ethical, legal and socially responsible manner. The strength of Aecon’s business and reputation is based not solely upon its conduct, but also on the behaviour of those with whom Aecon conducts its business. Aecon aspires to work with suppliers who share its core beliefs, values and commitment to performance with integrity and who demonstrate a commitment to protecting its confidential information.

This Code reflects the core values, beliefs and business practices of Aecon and its expectations of suppliers, contractors, consultants, agents and other suppliers of goods and services (collectively, “suppliers”) when conducting business with, for and on behalf of Aecon.

Compliance with this Code is a fundamental requirement of all agreements between Aecon and its suppliers whether or not specifically referenced by or incorporated into those agreements. Suppliers are required to comply with this Code and to ensure that its employees and representatives understand and comply with this Code. Failure to adhere to this Code may be grounds for termination of the supplier relationship and any related agreements.

3. DEFINITIONS

n/a

4. RESPONSIBILITIES

n/a

5. POLICY

5.1 Aecon’s Core Values and Business Practices

5.1.1 Human Rights

Aecon’s values are built on the highest standards of responsible and ethical business practices. Suppliers must abide fully by the Aecon Human Rights Policy.

5.1.2 Safety and Sustainability

Suppliers must have an established health and safety policy and program that meets applicable legislative requirements and promotes best practices and continuous improvement. Where the Aecon Environmental Health & Safety program exceeds the standards of the supplier, Aecon safety standards and applicable health and safety laws and regulations will be followed while attending Aecon’s offices and job sites. Suppliers

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must encourage their employees to be actively involved in the improvement of their health and safety and establish an expectation that the only acceptable result is everyone returning home safely every day. Additionally, suppliers can help strengthen Aecon's commitment to safety by immediately reporting to appropriate management any potentially unsafe condition, behaviour, accident or injury or any environmental or safety concern.

Suppliers are expected to register and maintain an account on the Aecon subcontractor prequalification database prior to providing services to Aecon.

Aecon promotes a zero tolerance policy for the use of drugs or alcohol in our workplaces. While on Aecon premises, working on behalf of Aecon or otherwise representing or being seen as representing Aecon, suppliers are not allowed to be impaired by alcohol or drugs or in possession of alcohol or illegal drugs.

Aecon expects suppliers to work with us to promote environmental sustainability, and conduct business in an environmentally responsible way to ensure compliance with applicable standards, laws and regulations.

Suppliers are expected to embrace the value of "Safety First" and understand that Aecon views safety performance and the safety culture of our suppliers as a condition of providing service.

5.1.3 Treating Everyone with Respect

Harassment, discrimination, violence, bullying, retaliation and other disrespectful and inappropriate behaviour are not tolerated. Suppliers must maintain workplaces characterized by professionalism and respect for the dignity of every individual with whom their employees interact. Subcontractors and suppliers are expected to maintain policies and programs that ensure a respectful workplace and comply with the legislated requirements to prevent harassment, violence or bullying in the workplace.

5.1.4 Doing Business with Integrity

In doing business with Aecon, suppliers must comply with all applicable laws including those related to bribery, money laundering, terrorism, trading with sanctioned countries, competition and anti-corruption.

Suppliers working on Aecon's behalf may not offer, promise or give a bribe to anyone, and may not request, agree to accept or take a bribe from anyone. Suppliers must not do anything that is intended to influence an act or decision of a public official. Bribery of public officials or individuals employed in the private sector with a view to obtaining or retaining any business is illegal and strictly prohibited. Suppliers must not make any facilitation payments (unofficial payments) to an individual for the purpose of securing or accelerating the performance of a service or a routine government action which the paying party is already entitled to, on behalf of Aecon or for the intended benefit of Aecon.

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Suppliers must not use gifts or entertainment to gain improper advantage or preferential treatment. Aecon expects suppliers will maintain appropriate records of exchanges of gifts and entertainment, which must be appropriate in the circumstances, with Aecon's employees.

5.1.5 Conflict Minerals

Aecon is committed to conducting its business operations in a manner that complies with applicable laws and regulations regarding conflict minerals. Aecon encourages its suppliers to undertake reasonable due diligence within their supply chain to determine the chain of custody and origin of any conflict minerals in accordance with the OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*. Suppliers are also expected to take measures to purchase parts, components or materials from their direct suppliers and sub-tier suppliers who source minerals for their products from smelters or refiners validated as being conflict-free.

5.1.6 Employment Practices

Suppliers must abide by applicable employment standards, labour, non-discrimination and human rights legislation. Where laws do not prohibit discrimination, or whether they allow for differential treatment, Aecon expects suppliers to be committed to non-discrimination principles and not to operate in a way that differentiates unfairly. Suppliers must also ensure full compliance with applicable wage, work hours, overtime and benefits laws.

Aecon will not under any circumstance engage any suppliers that exploit children, including recruiting child labour and any suppliers that engage in any form of forced labour.

5.1.7 Freedom of Association and Collective Bargaining

Suppliers must abide by the universal principles and norms that protect human rights with respect to the freedom of association and the freedom to conduct collective bargaining as set out in the *United Nations Global Compact* and in the declarations of the ILO.

5.1.8 Avoiding Conflicts of Interest

In Suppliers' relationships with Aecon's employees, suppliers must not try to gain improper advantage or preferential treatment for other relationships they may have with Aecon (for example, as a client). Suppliers must disclose if an Aecon employee or their immediate family members has or have a financial or other business interest (other than holding shares in a public company), or participates in any other way, in the supplier's company.

5.1.9 Privacy and Information Security

Suppliers must comply with all relevant privacy laws, and must only use information obtained through their relationship with Aecon for the purposes defined to them. Suppliers must have appropriate information security policies and procedures in place to secure

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access to Aecon's information. Suppliers must notify us promptly of any actual or suspected privacy or security breaches, or losses of Aecon's information.

5.1.10 Record Keeping

Suppliers must not destroy any Aecon records that may be relevant to any pending or threatened legal or regulatory proceeding of which suppliers are aware. Suppliers must maintain adequate internal records to ensure proper compliance with their obligations to Aecon.

5.1.11 Complying with Public Company Rules

In supplier's dealings with Aecon, suppliers may become aware of inside information about Aecon. Suppliers are prohibited from disclosing inside information regarding the business, operations or financial results or forecasts of Aecon. Inside information is any material, non-public information about Aecon that would likely affect the market price of Aecon's securities or that an investor would consider important in making a decision to buy, hold or sell Aecon's securities. Suppliers must not trade in Aecon's securities if they have inside information about the company and suppliers must not advise or talk to others regarding trading in those circumstances.

5.2 Duty to Report

Suppliers must immediately report to Aecon any concerns they may have regarding any Aecon-related business practices or conflicts of interest related to any of its employees, any Aecon employee or anyone acting on behalf of Aecon, to confidential@aecon.com.

5.3 Anti-Corruption and Compliance Attestation

Suppliers must sign Aecon's Anti-Corruption and Compliance Attestation to acknowledge their compliance with this Code.

5.4 Complying with This Code and Monitoring

Failure to comply with this Code may result in termination of a supplier's relationship with Aecon. Aecon may require a supplier to periodically confirm in writing to Aecon that it meets the requirements of this Code. Aecon may monitor and audit a supplier's compliance with this Code. This Code may be amended from time to time and it is the supplier's obligation to familiarize itself with the then-current version.

6. RELATED DOCUMENTS

n/a