



STAKEHOLDER ENGAGEMENT POLICY

Aecon Group Inc. (“Aecon” or “we”) and our Board of Directors (the “Board”) are committed to engaging openly and constructively with all our stakeholders. This Policy supplements Aecon’s Disclosure Policy, which details our commitment to accurate and timely disclosure regarding our business and affairs, in compliance with relevant securities laws.

ENGAGING WITH OUR STAKEHOLDERS

The Board has directed Aecon’s management, under the oversight of the President & Chief Executive Officer, to take a proactive approach to communication with stakeholders and the media.

We communicate with stakeholders in many ways. The primary form of communication to stakeholders who are shareholders is through the Investor Relations team. We also communicate with our shareholders through our quarterly and annual reports, annual information form, management information circular and quarterly earnings conference calls held with financial analysts and institutional investors. We also communicate with our broader stakeholder group through press releases, our website and social media platforms and presentations at industry and investor conferences. We afford an opportunity to all individuals attending our annual meeting of shareholders to ask questions regarding our business.

We invite you to follow us at:

aecon.com   

GOVERNANCE MATTERS

Aecon’s senior management, under the guidance of the Chief Financial Officer and the SVP, Corporate Development and Investor Relations is principally responsible for stakeholder communications and engagement. Our Board has delegated ultimate oversight of management’s interactions with stakeholders to its Corporate Governance, Nominating and Compensation (“CGNC”) Committee.

Aecon’s Investor Relations team presents an annual report to the CGNC Committee that summarizes stakeholder engagement activities, evaluates the team’s performance regarding stakeholder engagement and outlines future plans.

COMMUNICATING WITH THE BOARD

Between annual meetings of shareholders, Aecon supports a transparent process for shareholders and other stakeholders to contact the Board, including the chairs of the Board committees. The Board will endeavour to respond to all appropriate correspondence in a timely manner.

Stakeholders, including shareholders and their representatives, may contact the Board, or any of its directors as follows:

BY E-MAIL	BoardofDirectors@aecon.com
BY MAIL (in an envelope marked “Confidential – Board of Directors”)	Aecon Group Inc. Attn: Aecon Board of Directors 20 Carlson Court, Suite 105 Toronto ON M9W 7K6 Canada

The Lead Director may be reached directly via e-mail at LeadDirector@aecon.com, or by mail at the address specified above.

The Board has designated Aecon’s EVP, Chief Legal Officer & Secretary as its agent to monitor these e-mail accounts and forward correspondence from stakeholders to the relevant director.

Requesting a Meeting with a Director

A stakeholder may request a meeting with a director of our Board by contacting the Lead Director at the contact information provided above.

In the request for a meeting, a stakeholder should specify:

- i. whether he or she is a shareholder or shareholder representative and if so, the number of common shares held;
- ii. any other individuals wishing to attend the meeting; and
- iii. provide a general overview of the topic(s) to be discussed.

The Lead Director, together with the Chair of the Board, the CEO, the CFO and the EVP, Chief Legal Officer & Corporate Secretary will consider each request and how to proceed. If a meeting is approved, the Lead Director will confirm the meeting details with the stakeholder and will arrange for appropriate directors to attend. To ensure that we comply with our securities laws obligations as a public company, the meeting will focus on pre-determined topics.

COMMUNICATING WITH OUR MANAGEMENT

For general business operations, financial results, strategic direction, or other similar matters, please address your questions, comments, and/or concerns to the Investor Relations team.

BY E-MAIL	ir@aecon.com
BY PHONE	416.297.2600
BY FAX	416.940.2290
BY MAIL	Aecon Group Inc. Attn: SVP, Corporate Development & Investor Relations 20 Carlson Court, Suite 105 Toronto ON M9W 7K6 Canada

REVIEW

The CGNC Committee of the Board will periodically review this Policy and recommend any changes to the Board for approval.

We invite our stakeholders to communicate any comments they have in respect of this Policy and its implementation and ongoing evaluation via one of the mechanisms outlined above.