

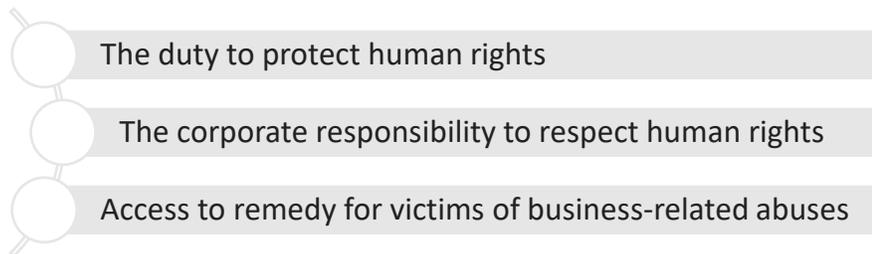


HUMAN RIGHTS POLICY

This Policy applies to Aecon Group Inc., its operating divisions, subsidiaries and joint ventures (collectively referred to as “Aecon” or the “Company”) and it augments and completes Aecon’s [Code of Ethics and Business Conduct](#).

RESPECT FOR HUMAN RIGHTS

Our strategies and operations are aligned with our commitment to the following three pillars:



We recognize that discrimination and breaches of human rights occur most often because of a person’s membership in a particular group in society. We are committed to protecting the rights of all people based on the following grounds and any others which may be protected under applicable law:

- Age
- Ancestry
- Citizenship
- Colour
- Creed
- Disability
- Ethnic Origin
- Family Status
- Gender Expression
- Gender Identity
- Marital Status
- Place of Origin
- Race
- Receipt of Public Assistance
- Record of Offences
- Sex
- Sexual Orientation

Modern Slavery and Human Trafficking

We are committed to ensuring that everything we do respects the highest standards to prevent human trafficking and “modern slavery”, which includes, but is not limited to, forced and child labour (as defined in the Fighting Against Forced Labour and Child Labour in Supply Chains Act), involuntary or exploitative prison labor, and other forms of modern slavery, to meet our responsibilities to our people, our stakeholders and our society. To achieve this goal, we:

- i) require our suppliers to abide by Aecon’s Supplier Code of Conduct, which includes by reference this Human Rights Policy;
- ii) require salaried Aecon employees to complete Aecon’s Code of Conduct training within thirty (30) days of joining Aecon, or as soon as possible thereafter, and renew such training in each subsequent year;
- iii) require prospective partners, vendors and suppliers to complete Aecon’s pre-qualification questionnaire and screening survey, as applicable;
- iv) require that partners, vendors and suppliers not engage in practices that may constitute modern slavery or human trafficking or use goods or services from suppliers in their supply chain that are used in the provision of goods or services to Aecon that engage in practices that may constitute modern slavery or human trafficking;
- v) carry out internal and third-party investigations regarding prospective or existing partners, vendors and suppliers as necessary for high-risk counterparties, as identified through Aecon’s pre-qualification questionnaires or surveys, Aecon’s whistleblower hotline, or as we otherwise deem appropriate;
- vi) require that all new partners, vendors and suppliers attest as to compliance with the Supplier Code of Conduct and the Human Rights Policy;
- vii) are dedicated to protecting our employees, contractors, partners and clients from any form of modern slavery and human trafficking by promoting their wellness throughout all our activities in accordance with our core values; and
- viii) do not engage in activities that encourage human rights abuses or that support trafficking in persons or the use of child labour or forced labour.

These processes and standards help Aecon to identify potential modern slavery, human trafficking and broader human rights risks. Once identified, and depending on the risks, Aecon is able to implement a plan that will help to prevent or mitigate certain risks or may avoid working with the prospective counterparty all together.

A failure to comply with the Supplier Code of Conduct and this Policy may be result in the termination of the partner’s, vendor’s or supplier’s contract with Aecon.

Whistleblower Hotline

Aecon’s Whistleblower Policy encourages anonymous reporting of corrupt, illegal or otherwise undesirable conduct. The Whistleblower Policy is an important element in detecting these issues and sets out how Aecon will support its employees and personnel so that they can safely express their concerns, know who to contact, know how to make a report and their protections.

Our Commitment to Canada's Indigenous Communities

Aecon's Indigenous Strategy supports the inclusion, engagement and participation of Indigenous communities in our projects across Canada. We are dedicated to a comprehensive Canada-wide approach to Indigenous engagement and our Indigenous Engagement Program is comprised of three core elements, which are the foundation of our 360° Strategy.

1. Education and Training

We work with training organizations that offer diverse employment and training opportunities to assist Indigenous Communities in meeting Aecon's employment and business requirements.

2. Employment

We are dedicated to fair and equitable opportunities for participation in employment associated with our activities and projects. Indigenous Communities close to Aecon's project sites offer a unique opportunity to develop a stable local workforce.

3. Business Development

We strive to increase capacity within the communities by working with local businesses, suppliers and contractors. In communities where resource development partnerships are welcomed, and opportunities are available, we encourage Indigenous Communities to participate in long-term business development and new technology initiatives.

Land Rights and Water Resources

We recognize the importance of land rights and the principle of free, prior and informed consent (FPIC) as an aspect of the right to self-determination of Indigenous groups. We are committed to complying with all applicable laws.

We respect the human need for sustainable water supplies, safe drinking water and proper sanitation. We have a decades-long history of successfully delivering water and wastewater projects and we pride ourselves on minimizing our footprint within the habitats we work in and, most notably, regarding near-water and in-water construction.

Protection of the Rights of Children

We condemn all forms of exploitation of children. We do not recruit child labour and we support the elimination of exploitive child labour. We are also supportive of laws duly enacted to prevent and punish the crime of sexual exploitation of children. We will cooperate with law enforcement authorities to address any such instances of exploitation of which we become aware.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We adhere to universal principles and norms that protect human rights in employment, as specified in the United Nations Global Compact and in the declarations of the International Labour Organization, including, among other matters, with respect to the freedom of association and the freedom to conduct collective bargaining.

We respect our employees' right to join, form or not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives.

WORKING CONDITIONS

We compensate employees competitively relative to the industry and local labour market, and, for our unionized employees, in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

WORKPLACE SAFETY AND SECURITY

We provide a safe and healthy workplace and will take all precautions to protect employees, subcontractors, visitors and the public from workplace violence and harassment. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

GOVERNANCE

While human rights are the responsibility of all of us at Aecon, executive oversight and responsibility for the implementation of this Policy rests with our SVP, Human Resources. The Corporate Governance, Nominating and Compensation Committee of our Board of Directors, which meets at least four times per year, oversees the implementation and compliance with this Policy at the Board level.

APPLICATION OF POLICY TO SUPPLIERS

We have always been, and continue to be, committed to carrying out our business in a way that is respectful of human rights. As such, we strive to do business with individuals and companies that conduct themselves in the same way. All Aecon suppliers must:

- respect and abide by the laws, customs and business practices of the countries (including, without limitation, applicable health and safety and environmental legislation) in which the activities with Aecon are to be carried out;
- agree to be bound by Aecon's Supplier Code of Conduct and this Policy; and
- comply strictly with the human rights principles set out in this Policy and in Aecon's Supplier Code of Conduct.

Violation of this Policy by a Supplier shall be cause for immediate termination of such Supplier's contract.

STAKEHOLDER ENGAGEMENT

We are committed to engaging openly with stakeholders on issues that impact human rights and to conducting ongoing human rights due diligence. We invite our stakeholders to communicate to us any questions, comments or concerns they have in respect of this Policy and its implementation.

REMEDIES

Employees

Every employee should understand that any violation of human rights as described in this Policy, would subject the employee to appropriate disciplinary action, up to and including immediate dismissal for cause.

Stakeholders

If a stakeholder believes that we have fallen short of the standards that we set out in this Policy or have infringed upon their rights, we will provide mechanisms as set out in our Code of Ethics and Business Conduct through which complaints may be raised and addressed in an accessible, timely and equitable manner. We will monitor the issues raised through such mechanisms and we will seek to achieve resolution through engagement and dialogue. We are committed to continue increasing the capacity of our management to effectively identify and respond to concerns. We also promote the provision of effective grievance mechanisms by our suppliers.