



# Corporate Social Responsibility Policy

At The Commencement Group, we define Corporate Social Responsibility as follows:

- Conducting business in a socially responsible and ethical manner
- Protecting the environment and the safety of people
- Supporting human rights
- Engaging, learning from, respecting and supporting the communities and cultures with which we work

The Commencement Group will ensure that all matters of Corporate Social Responsibility are considered and supported in our operations and administrative matters and are consistent with The Commencement Group stakeholders' best interests. The Commencement Group is committed to being recognized as a leader in the field of Corporate Social Responsibility and recognizes that in doing so, we will add significant value for our shareholders.

This Policy applies to activities undertaken by or on behalf of The Commencement Group anywhere in the world.

All Commencement Group employees and contractors will adopt the Corporate Social Responsibility considerations described in this policy into their day-to-day work activities. The Commencement Group leaders will act as role models by incorporating those considerations into decision-making in all business activities. The Commencement Group leaders will ensure that appropriate organizational structures are in place to effectively identify, monitor, and manage Corporate Social Responsibility issues and performance relevant to our businesses.

This Policy is built on the following areas that reflect existing and emerging standards of Corporate Social Responsibility:

## **Business Ethics and Transparency**

The Commencement Group is committed to maintaining the highest standards of integrity and corporate governance practices in order to maintain excellence in its daily operations, and to promote confidence in our governance systems.

The Commencement Group will conduct its business in an open, honest, and ethical manner.

The Commencement Group recognizes the importance of protecting all of our human, financial, physical, informational, social, environmental, and reputational assets.

The Commencement Group will advise our partners, contractors, and suppliers of our Corporate Social Responsibility Policy, and will work with them to achieve consistency with this policy.

The Commencement Group is committed to measuring, auditing and publicly reporting performance on its Corporate Social Responsibility programs.

### **Environment Health & Safety**

The Commencement Group is committed to protecting the health and safety of all individuals affected by our activities, including our employees, contractors and the public. The Commencement Group will provide a safe and healthy working environment, and will not compromise the health and safety of any individual. Our goal is to have no accidents and mitigate impacts on the environment by working with our stakeholders, peers and others to promote responsible environmental practices and continuous improvement.

The Commencement Group is committed to environmental protection and stewardship.

The Commencement Group recognizes that pollution prevention, biodiversity and resource conservation are key to a sustainable environment, and will effectively integrate these concepts into our business decision-making.

All employees are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes, and for operating in an environmentally responsible manner.

### **Stakeholder Relations**

The Commencement Group will engage stakeholders clearly, honestly, and respectfully.

The Commencement Group is committed to timely and meaningful dialogue with all stakeholders, including shareholders, customers, and employees, indigenous peoples, governments, regulators, and landowners, among others.

### **Employee Relations**

The Commencement Group will ensure that employees are treated fairly and with dignity and consideration for their goals and aspirations and that diversity in the workplace is embraced.

The Commencement Group will apply fair labour practices, while respecting the national and local laws of the countries and communities where we operate.

The Commencement Group is committed to providing equal opportunity in all aspects of employment and will not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment.

### **Human Rights**

The Commencement Group recognizes that governments have the primary responsibility to promote and protect human rights. The Commencement Group will work with governments and agencies to support and respect human rights within our sphere of influence.

The Commencement Group will not tolerate human rights abuses, and will not engage or be complicit in any activity that solicits or encourages human rights abuse.

The Commencement Group will always strive to build trust, deliver mutual advantage and demonstrate respect for human dignity and rights in all relationships it enters into, including respect for cultures, customs and values of individuals and groups.

### **Community Investment**

The Commencement Group stresses collaborative, consultative, and partnership approaches in our community investment programs.

The Commencement Group will integrate Community Investment considerations into decision-making and business practices, and will assist in local capacity building to develop mutually beneficial relationships with communities.

The Commencement Group will contribute to our host communities' quality of life by supporting innovative programs in health, education, social services and the environment, as well as cultural and civic projects.

The Commencement Group will strive to provide employment and economic opportunities in the communities where we operate.