

Workplace Codes/s of Conduct

Statement on Business Conduct

The Commencement Group is committed to conducting its business in accordance with the letter and spirit of all applicable laws of the countries in which it operates.

All relationships with landowners, suppliers, governments, regulators, First Nations representatives, shippers, customers, partners, the general public and other stakeholders shall be honest, fair, courteous, respectful, conducted with integrity and with due regard for the protection of the interests involved. The Commencement Group will ensure meaningful and transparent consultation with all stakeholders and strive to integrate its corporate activities with local communities so they may benefit from our presence.

Employee Relations, Health, Safety, Environment and Human Rights

The Commencement Group is committed to ensuring its employees are treated fairly, compensated appropriately, and hired and promoted without discrimination by reason of race, nationality, ethnic origin, color, religion, age, gender, marital status, family status, sexual orientation, political belief or disability. Discrimination of any kind will not be tolerated.

The Commencement Group shall establish and maintain safe working conditions and conduct its operations in an environmentally responsible manner in accordance with applicable environmental laws, regulations and standards. All employees and contractors shall be aware of and comply with The Commencement Group's applicable health, safety and environmental policies. This includes making sure that no employee works more hours per week than is allowable by the Voluntary Principles on Security and Human Rights as set forth by the US Bureau of Democracy, Human Rights and Labor. It further insures that no employee is paid less than the countries minimum wage, or a fair living wage should minimum wage be deemed below living wage.

The Commencement Group shall support the protection and observance of human rights and freedoms within its sphere of influence and has adopted the Voluntary Principles on Security and Human Rights as set forth by the US Bureau of Democracy, Human Rights and Labor.

Consultants and Contractors

Consultants and contractors retained by The Commencement Group shall conduct themselves in accordance with this Statement in their activities relating to The Commencement Group.