

SUSTAINABILITY POLICY | AECON

Introduction:

Aecon is committed to conducting business in a sustainable manner, recognizing the importance of balancing environmental stewardship, social responsibility, and ethical governance. This policy outlines Aecon's commitment to sustainability across its operations and engagements.

Scope:

This policy applies to all of Aecon's activities in which it has operational control. It serves as a framework for integrating sustainability principles across its supply chain and stakeholder relationships. See *Sustainable Procurement Policy* (pg. 2) for more details on sustainability-related expectations for suppliers.

Purpose:

Aecon acknowledges its responsibility to minimize negative impacts on the environment, deliver positive social impact, and uphold ethical standards. This policy guides Aecon in achieving these objectives.

Environment:

Aecon is committed to reducing its ecological footprint and fostering environmental stewardship across its operations, through responsible resource management, climate-conscious practices, and biodiversity preservation.

- Implementation of an enterprise-wide environmental management system.
- Conserving resources and reducing emissions through efficient practices.
- Mitigating climate impacts and integrating emission reduction in procurement decisions.
- Minimizing waste and promoting reuse and recycling initiatives.
- Respecting biodiversity and protecting ecological resources.

Social:

Aecon prioritizes the well-being of its employees and communities, embraces diversity and inclusion, and adheres to ethical labour practices.

- Prioritizing health, safety, diversity, and equity.
- Supporting skills development and education for growth.
- Aligning with human rights and promoting fair labour practices.
- Investing in human capital through training and mentorship.
- Driving positive social impact in the communities where we work.
- Meaningful engagement [in reconciliation](#) by working in unison with Indigenous Peoples.

Governance & Ethics:

Aecon upholds the highest standards of governance and ethics, integrating sustainability into our decision-making processes and risk assessments. We are committed to transparency, accountability, and ethical conduct throughout our business activities and supply chain engagements.

- Assessing risks and opportunities related to sustainability.
- Adhering to a strict code of ethics and anti-corruption measures.
- Setting clear expectations for ethical conduct across our supply chain.
- Engaging stakeholders for transparency and accountability.

This sustainability policy represents Aecon's commitment to responsible business practices, environmental stewardship, social well-being, and ethical governance. Aecon will continuously review and improve its sustainability initiatives to build what matters to enable future generations to thrive.

SUSTAINABLE PROCUREMENT POLICY

Overview:

Aecon is committed to addressing sustainability through our supply chain. We recognize that the products and services we procure have both environmental and social impacts and we are committed to addressing these through our procurement procedures. Our policy for sustainable procurement will be to acquire products and services that meet our needs, deliver long term value, maximize social and economic benefits, and minimize damage to the environment and health.

Screening:

All Aecon subcontractors, suppliers, and/or manufacturers may be subject to a sustainability screening process. Compliance with this screening process may vary, proportionate to the relevance and level of engagement between subcontractor, supplier and / or manufacturers and Aecon.

Supplier / Manufacturer Selection Process:

When selecting subcontractors, suppliers and/or manufacturers of materials, suppliers, and equipment, Aecon will consider and seek evidence of their ability to meet sustainability requirements. Examples of qualifying requirements include but are not limited to:

- Environmental management systems consistent with ISO (International Organization for Standardization) 14001
- Product-specific type III Environmental Product Declaration (EPD) conforming to ISO 14025, 14044.
- Third-party verified sustainability program (e.g., Forest Stewardship Council (FSC), Green Seal, EcoLogo, Underwriter Laboratory, National Biosolids Partnership (NBP), Concrete Sustainability Council (CSC), etc.)
- Corporate Sustainability Report, preferably aligned to a recognized

sustainability framework, like Global Reporting Initiative (GRI), Sustainable Accounting Standards Board (SASB).

- Greenhouse Gas Emission tracking, targets, and/or alignment to the Science-Based Target Initiative
- Compliance with Labour Standards (e.g., Canada's Modern Slavery Act, International Labour Organization (ILO) Conventions)

Given the complex nature of infrastructure procurement, sustainability procurement requirements may be adapted based on project location, size, etc.

Aecon recognizes the importance of a sustainable procurement role it plays for the achievement of a more sustainable future and will implement this procurement policy as an element within our overall sustainability strategy.