

 SNC • LAVALIN	POLICY		No.: 1002
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1. PURPOSE

The purpose of this Global Health & Safety (H&S), Security (S) and Environment (E) Policy (hereafter “**HSSE Policy**” or “**Policy**”) is to outline how SNC-Lavalin achieves its commitment in establishing and maintaining safe and secure working conditions that respect the physical environment they occupy, and follow the principles of sustainable development in accordance with its Values and Code of Ethics and Business Conduct.

This Policy is the foundation for all SNC-Lavalin’s Health and Safety, Security, and Environment (“**HSSE**”) & Sustainability management processes/systems. It is the governing corporate document that outlines SNC-Lavalin’s expectations for a common and consistent approach towards health and safety, security, and sustainable environmental management and overall HSSE performance.

The Global HSSE Policy brings together three fields of expertise, all of which come under the auspices of Integrated Management Systems (“**IMS**”), in recognition of the fact that when put into practice, these distinct domains are interconnected, mutually reinforcing, and form the pillars on which all SNC-Lavalin activities are conducted. Indeed, Health & Safety, Security and Environment & Sustainability are the basis for continued business success; enabling activities and ensuring that they can be carried out without any incident, thus avoiding unanticipated costs or overruns

Under the umbrella of the IMS corporate function, each domain (in collaboration with one another where appropriate) develops strategies, Standard Operating Procedures (“**SOPs**”), internal controls, objectives, targets and performance indicators, along with technical systems and tools to help manage HSSE risks and improve the overall HSSE performance.

SNC-Lavalin is committed to the highest standards in the management of Health & Safety, Security and Environment & Sustainability. A statement to this effect, from the President and Chief Executive Officer is included as Appendix A to this Policy. This statement is intended for all SNC-Lavalin Employees and all persons doing work on SNC-Lavalin Controlled Sites (as defined in section 4 below).

2. SCOPE

This Policy applies to SNC-Lavalin Group Inc. and any Entity over which it has direct or indirect effective control including the following entities: divisions, business units, regional offices, subsidiaries, as well as any partnerships, joint ventures, infrastructure concessions and consortia (hereinafter referred to as “**SNC-Lavalin**”). In cases where SNC-Lavalin does not exercise or cannot exercise effective control over a given entity or if regulatory or legal constraints prevent a given entity from adopting and implementing this Policy, then SNC-Lavalin must recommend, to such entity, the adoption and implementation of a policy providing similar scope and principles.

This Policy applies to all stages of SNC-Lavalin’s activities.

SNC-Lavalin expects its business partners to abide by similar high standards of HSSE performance as we adhere to and reserves the right to assess their HSSE policies, procedures and performance. Poor HSSE performance may be grounds for refusing to enter into a business relationship or terminating it.



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3. AUDIENCE

This Policy is addressed to any individual participating in SNC-Lavalin’s activities, including, but not limited to, Employees, Contractors and Subcontractors, as well as suppliers, business partners in joint ventures, consortia and clients.

This Policy is equally addressed to the members of the Board of Directors when active on behalf of SNC-Lavalin.

All of the above are required to abide by and promote SNC-Lavalin’s measures to prevent, reduce, mitigate, or eliminate Health & Safety, Security, and Environment Risks. This obligation is based on the principle that every individual has a role to play in creating a healthy, safe, secure and environmentally sustainable working environment: **HSSE is Everyone’s Business.**

4. DEFINITIONS

“**Best Environmental Management Practices**” refers to methods or techniques found to be the most effective and practical in achieving pollution prevention.

“**Business Resilience**” refers to the ability of an organization to quickly adapt to disruptions, out of normal circumstances, while maintaining continuous business operations and safeguarding people, assets and overall brand equity.

“**Catastrophic Incident**” corresponds to an incident with very high consequence description as per the risk description. These incidents require immediate attention.

“**Compliance Obligations**” refers to requirements that SNC-Lavalin has to or chooses to comply with, including but not limited to legislation, contractual requirements, codes of practices, voluntary standards, etc.

“**Contractor**” means any individual who is not a client or Employee of SNC-Lavalin and who has a contractual relationship with SNC-Lavalin. This includes consultants, inspectors, Subcontractors and suppliers (altogether counted when on an SNC-Lavalin Controlled Site).

“**Controlled Site**” means a location (office, construction site, facility in operation or maintenance) where SNC-Lavalin has full and contractual health and safety and/or environmental responsibility for completion. By opposition, a “Non-Controlled Site” refers to situations where: (i) a Site is a Joint Venture where SNC-Lavalin has less than 50% participation; (ii) a Site is a Joint Venture where SNC-Lavalin has 50% or greater participation in the prime Contractor partnership, however, HS or E management for the Site is performed using the partner’s programs and processes; (iii) the division of responsibilities is such that SNC-Lavalin does not control the workforces and work processes.

For example, SNC-Lavalin does the design and engineering while the Joint Venture partner hires the contractors and controls the construction/build activities.

“**Critical Risk Control Protocols**” are non-negotiable practices designed to control high risk areas having resulted in fatalities and serious incidents.



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“**Emergency Response Plan**” or “**ERP**” means a plan of action for the efficient deployment and coordination of services, agencies, and personnel to provide the earliest possible response to an emergency.

“**Employee**” means regular, occasional, temporary, contractual, full- or part-time employees working at all levels of SNC-Lavalin.

“**Environment**” refers to surroundings in which Controlled Sites operate, including air, water, land, natural resources, flora, fauna, humans and their interrelationships.

“**Environmental Aspect**” means any element of a project’s activities that can interact with the Environment.

“**Environmental Aspects/Impacts Register**” refers to a document (most often a spreadsheet) which gathers all Environmental Aspects and Environmental Impacts identified for all activities of a specific Site, indicates the significance of these Environmental Aspects and Environmental Impacts and identifies environmental control measures.

“**Environmental Impact**” means any change to the Environment, whether adverse or beneficial, wholly or partially resulting from a project’s Environmental Aspect.

“**Four Security Pillars**” mean Personnel Security, Physical Security, Cyber Security, and Business Resilience and Recovery.

“**GEMS**” means Global Environmental Management System.

“**GHSMS**” means Global Health and Safety Management System.

“**HS**” means Health and Safety.

“**Job Environmental Analysis**” has the meaning ascribed to it in Section 6.1.3 of this Policy.

“**Knowledge Network**” defines the SharePoint site used by SNC-Lavalin to exchange information and build knowledge on different topics.

“**Risk Evaluation**” means the determination of risk levels associated with identified hazards.

“**Risk Register**” is a tool (most often a spreadsheet) used to identify hazards, evaluate risk levels for these hazards, and propose controls and related action plans.

“**Site**” means any location where SNC-Lavalin conducts activities, including, but not limited to, offices, project sites, operating facilities, etc.

“**StepBack Risk Evaluation**” relates to the in-house program used by SNC-Lavalin to identify hazards, assess risk levels and propose controls at the workforce, typically done at the beginning of every work shift.

“**Subcontractor**” means a contractor hired by a Contractor.



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5. OVERVIEW

This Policy addresses the core principles and processes set out by the HSSE management processes/systems such as the Global Health & Safety and Global Environment Management Systems (GHSMS and GEMS), which are based on a **Plan-Do-Check-Act** cycle. This iterative four-step management method is used for the control and continual improvement of the GHSMS and GEMS.

6. PLAN

6.1. Identification and Assessment of HSSE Risks

SNC-Lavalin’s HSSE management processes are risk-based, systematic, and responsive to change. This strategy is designed to mitigate and reduce risks which may exploit SNC-Lavalin’s vulnerabilities, cause harm to Employees, loss of or damage to assets, attack SNC-Lavalin’s reputation and/or impact its digital information.

Identification and Assessment of HSSE Risks is accomplished by having all Business Units perform comprehensive risk assessments to ensure all hazards are identified, assessed and evaluated to effectively eliminate and/or control risk levels.

For risk assessment purposes, SNC-Lavalin has developed corporate H&S, S and E Risk Matrices, used to determine risk levels. These tools help determine the H&S, S or E risk level. All Controlled Sites shall use them as a part of the HSSE Risk Management process.

6.1.1. **SNC-Lavalin H&S Risk Management**

SNC-Lavalin H&S Risk Management is three-tiered:

a) ***Risk Register***

An active Risk Register shall be maintained during each phase of a Project’s lifecycle to catalogue every significant risk and the measures to control them. The Project representatives who best understand the H&S risks should participate in Risk Evaluation meetings to develop and update the Risk Register.

b) ***Job Safety Analysis***

The Job Safety Analysis (“**JSA**”) is a comprehensive hazard assessment process intended to establish standard safeguards and specific methods for the work activities. A JSA shall be conducted in advance for work activities that have been identified as risk prone in the Risk Register, as well as for other planned and routine activities.

c) ***StepBack Risk Evaluation***

The StepBack Risk Evaluation is used to identify hazards and the appropriate



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control measures in a consistent and systematic manner. It encourages all SNC-Lavalin Employees and Contractors to step back two meters and take two minutes at the commencement of a new day, new work assignment and/or when work conditions have changed to think critically about their working environment. It is required that all Controlled Sites use the StepBack Risk Evaluation.

6.1.2. SNC-Lavalin’s Security Management

To meet Global Security’s mission of protection people, assets, and reputation in the digital and physical world, the SNC-Lavalin’s Security Risk Management strategy is structured along the following Four Security Pillars: Personnel Security; Physical Security; Cyber and Information Security and Data Protection; and Business Resilience and Recovery.

This effectively ensures that SNC-Lavalin has the systems, tools and Employees needed to prepare for, respond to, manage through and recover from unplanned security events or incidents, be they natural, man-made, cyber or of other kind. Additionally, this includes providing Employees with the knowledge and tools to carry out normal business activities while recognizing, understanding, and mitigating risks to themselves, their colleagues and SNC-Lavalin.

6.1.3. SNC-Lavalin’s Environmental risk management

SNC-Lavalin’s Environmental risk management is twofold:

a) Environmental Aspects/Impacts Register (Risk Register)

An active Environmental Aspects/Impacts Register shall be maintained during each phase of a project’s lifecycle to identify every significant Environmental Aspect and the measures to control them. The project representatives who best understand the Environmental Aspects and Environmental Impacts should participate in Risk Evaluation meetings to help identify and evaluate risks associated with identified Environmental Aspects and Environmental Impacts and develop and update the Environmental Aspects/Impacts Register.

b) Job Environmental Analysis

The Job Environmental Analysis is a comprehensive hazard assessment process intended to establish standard safeguards and specific methods for the work activities. Whenever relevant to work activities, the Job Environmental Analysis shall also include a review of significant Environmental Aspects and control methods. It is recommended that a Job Environmental Analysis be conducted in advance of work activities that have been identified as risk prone in the Risk Register.



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6.2. Legal and other Compliance Obligations

Business Units shall abide by their HSSE legal and other Compliance Obligations by demonstrating knowledge of and complying with all relevant and applicable laws, regulations and other requirements in their respective jurisdictions and geographical areas.

Business Units shall maintain an up to date legal and other Compliance Obligation register for all Controlled Sites.

6.3. Objectives and Planning

HSSE is an integral part of the strategic planning process at SNC-Lavalin. The IMS function formulates annual objectives and targets to ensure consistency with this Policy and continual improvement of HSSE performance as well as the effectiveness of the HSSE management processes and systems. These objectives and targets are reviewed and approved by the Executive Committee and implemented by each of the three domains, under the auspices of IMS.

HSSE objectives and targets consider HSSE significant aspects and risks as well as legal, technological, financial, operational and business requirements.

Business Units shall comply with these specific objectives and targets. Progress towards achieving them is monitored by IMS and reported to Senior Management on a monthly basis.

7. DO

7.1. Roles, Responsibilities, Accountability and Authority

Successful implementation of the HSSE management processes/systems on Controlled Sites is a line management responsibility (i.e. executives, managers and supervisors). Line management cannot absolve itself of HSSE responsibility merely by subcontracting HSSE responsibilities to Subcontractors. Therefore, both SNC-Lavalin and its Contractors have responsibilities and are accountable for the implementation of the activities under the HSSE management processes/systems. The HSSE approach and targets are communicated by Senior Management to the Business Units and then cascaded down to the Site management. Where elevated H&S, Security, or Environment risks exist on a site, the relevant domain can mandate that the Business Unit employ a domain expert to manage the specific risks on that site.

7.2. Competence, Training and Awareness

SNC-Lavalin’s approach to HSSE training and competency is to promote continual improvement and reward innovation. SNC-Lavalin’s leadership believes in HSSE excellence as a core value and encourages its Employees to work as HSSE champions. All Business Units are expected to ensure that their Employees and those working on their behalf are competent to perform their jobs. In the absence of full competency, sufficient supervision must be put in place.



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For the purposes herein, a **fully** competent worker:

- Is qualified because of knowledge, training and experience to organize the work and its performance;
- Is fit for the task to be performed;
- Is familiar with Legal and other Compliance Obligations applicable to his/her work; and
- Has knowledge of HSSE issues related to his/her tasks and workplace.

7.3. Internal and External Communication

SNC-Lavalin encourages all Employees to engage in discussions and dialog that promote recognition and understanding of HSSE hazards and risk levels and that address the appropriate mitigation, behaviours and responses for every Site. HSSE meetings should be held on a regular basis for every Site.

Business Units shall have a process to receive, document and respond to HSSE related complaints brought to their attention by external interested parties such as clients, communities, general public, governmental agencies, etc.

7.4. Operational Controls

Standard Operating Procedures (SOP) are developed by each domain (often in collaboration with one another), under the umbrella of IMS, to address already identified HSSE hazards and require the implementation of controls in order to manage HSSE related risks. Key high risk HS activities are addressed by the Critical Risk Control Protocols. Key high risk and recurring environmental issues are addressed by Best Environmental Management Practices.

Specific to Security, operational controls are divided along the Four Security Pillars as follows:

- A. Personnel Security** – with a global footprint, personnel security includes (but is not limited to) key programs such as the Travel Security Program, Pandemic Plan, Expatriate Security Program, and Training,
- B. Physical Security** – SNC-Lavalin has numerous facilities, offices, project sites, all of which require physical security and safeguards to protect people, information, assets and infrastructure against a broad range of threats and related risks.
- C. Cyber and Information Security and Data Protection (Cyber Security)** – with an ever growing presence and dependence on technologies, this program seeks to develop and deploy programs and initiatives to protect SNC-Lavalin’s digital assets, data and information and prevent unlawful acts which can impact operations and the technology it relies on, including intellectual property and high value assets.
- D. Business Resilience and Recovery** – the multitude of unexpected events that could disrupt normal business activities cannot be ignored. Business resilience and recovery



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programs and initiatives ensure that: SNC-Lavalin’s response to any unplanned events and incidents is adequately planned and prepared; the impacts are mitigated; and SNC-Lavalin manages through the accompanying circumstances which can paralyze it. Business resilience and recovery programs also guides SNC-Lavalin as it recovers from disasters and unplanned events and returns to full operation as quickly as possible.

All applicable SOPs developed by IMS must be followed by the Business Units. When a Business Unit identifies specific clauses that it cannot implement within its scope of operations, a deviation request must be submitted by the Business Unit senior management to IMS.

7.5. Emergency Preparedness and Response and Business Resilience and Recovery

All Controlled Sites shall be adequately prepared to react in an efficient and effective manner to protect people, the community, the Environment, client assets and company assets, in the event of an emergency. All Controlled Sites must have a comprehensive and current Emergency Response Plan and conduct regular and planned drills.

All SNC-Lavalin Corporate, Regional and Local (Countries, projects and sites) operations need to plan and prepare for, respond to and recover from any major or catastrophic incident that could disrupt normal business activities and impact our people, environment, assets, and reputation.

The Business Resilience and Recovery (BRR) Program SOP provides the framework to ensure SNC-Lavalin has the appropriate resources and incident response plans to recover from major or catastrophic incidents.

Operations at each level (Corporate, Regional and Local) shall work in concert with the level above and below depending on the severity of the incident and the capacity of the level. The BRRP SOP defines the escalation procedure to be followed.

8. CHECK

This process is carried-out at three levels: Corporate Audit; Performance Measurement and Monitoring; and Incident Reporting and Investigation.

8.1. Corporate Audit

Each of the three HSSE domains shall implement a corporate audit program to monitor compliance with this policy and relevant SOPs.

8.2. Performance Measurement and Monitoring

Processes to measure track and evaluate leading and lagging HSSE indicators are developed by IMS in support of the annual objectives and targets mentioned in section 6.3 above. The indicators define work related events in an effort to promote a strong HSSE culture (leading



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indicators) and work related HSSE incidents (lagging indicators). Business Units shall report their performance towards these indicators to IMS on a monthly basis.

It is understood that these indicators may not always coincide with the reporting definitions used by the regulators or clients in particular jurisdictions. Hence, it may be necessary that Sites keep two sets of data, one corresponding to the local regulatory/client reporting requirements and another one that meets SNC-Lavalin’s indicators as part of the corporate reporting process.

8.3. Incident Reporting and Investigation

All Sites must report all incidents to IMS via the HSSE databases in accordance with the reporting tool set up for this purpose.

All Employees are expected to report all incidents utilizing the Incident Investigation Standard Operating Procedure (No. 6853.2-EN). The investigation team establishes the root causes of these incidents by using the Incident Cause Analysis Methodology (“**ICAM**”), as detailed in the aforementioned Incident Investigation Standard Operating Procedure. If the investigation team finds that the root causes lie in non-conformity with HSSE established requirements, it must establish corrective and preventive actions to prevent the reoccurrence of such non-conformities. The Business Unit must conduct a Risk Evaluation on these actions before they are implemented in order to ensure that such actions do not lead to new uncontrolled HSSE risks.

All recordable HS incidents as well as all significant HSSE incidents must be reported by the relevant Business Unit to the President and CEO within twenty-four (24) hours of occurrence.

9. ACT

Integrated Management Systems, with input from the Business Units, shall conduct periodic management reviews of the HSSE management processes/systems where the system suitability, adequacy and effectiveness are evaluated. Items to be reviewed include:

- Status of actions from previous management reviews;
- Changes in external and internal issues that are relevant to the HSSE management processes/systems, Compliance Obligations and significant Environmental Aspects as well as risks associated with threats and opportunities;
- Extent to which objectives have been met;
- Information on performance;
- Communications from external interested parties;
- Adequacy of resources required for maintaining effective HSSE management processes/systems.

During these management reviews, IMS shall assess opportunities for continual improvement and

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include any decisions and actions related to possible changes to the HSSE management processes.

Relevant outputs of the management reviews are subsequently made available for communication and consultation via HSSE on-line sites including the Global Health & Safety Knowledge Network site and the Global Environmental Management System SharePoint site.

10. GUIDANCE

For questions or further information with respect to this Policy, please contact IMS by email: hsse.ims@snc-lavalin.com.

Related Policies and SOPs
Code of Ethics and Business Conduct (<i>Section 2.4</i>)
Travel Security, and Health and Safety (<i>SOP 1910</i>)
Business Resilience and Recovery (<i>SOP 6846.3</i>)
Information and Data Security (<i>SOP1930</i>)
Procurement, Transport, Storage, Use and Disposal of Explosives (<i>SOP 1951</i>)
ISO 27001 Information Security Management (<i>September 2013</i>)

HSSE Policy Statement

Health & Safety, Security and Environment

At SNC-Lavalin, we make sure everything we do respects the highest standards for health & safety, security and environmental protection in order to meet our duty of care to our people, our stakeholders and our planet. Health & safety, security and environmental protection are at the core of our values.

Our principles

We are dedicated to continually protecting our employees, contractors and clients from occupational illness and work-related incidents, and promoting their wellness throughout all our activities. It is our responsibility to continually improve the environmental performance of our activities and products, and to ensure the safety and security of our employees at all times.

Our commitments

- > Demonstrate visible safety leadership, prevent all injuries and ensure that every person returns home safe at the end of each work day;
- > Drive a robust security culture to protect our people, physical and digital assets, and reputation against unplanned events of all kinds;
- > Implement the principles of pollution prevention and sustainability so as to prevent short term or lasting harm to the planet and help today's generation meet its needs without compromising the ability of future generations to meet theirs.

These commitments apply to everything we do, no matter where we do it. To this end, we:

- > Train and support our employees and all who work on our behalf, so they may be HSSE ambassadors amongst their peers and within the communities where they live and work;
- > Set measurable annual objectives and targets to continually improve our performance. No matter how well we perform, we will always guard against complacency and maintain a high level of vigilance wherever and whenever our people are engaged in company related activities;
- > At all times, fulfill all our compliance obligations;
- > Always be transparent and communicate with our stakeholders regarding our HSSE performance;
- > Work with our supply chain to achieve excellence in HSSE performance.

While the President and Chief Executive Officer of SNC-Lavalin is responsible for implementing and monitoring this Policy, all employees and persons working on our behalf must share these commitments. Everyone is empowered to speak up and act to ensure that they are met.



Neil Bruce
President & CEO
January 1, 2016