



VERUS CONSTRUCTION SERVICES INC.

Supply Chain Code of Conduct and Monitoring and Remediation Procedure

INTRODUCTION:

We aim to inspire trust and loyalty in our clients by establishing a Supply Chain Code of Conduct and Monitoring and Remediation Procedure aligned with the strong ethical, social and environmental principles that uphold our high procurement standards. We, and all those that work with and for us, must be committed to working with integrity and honesty during procurement.

Our Supply Chain Code of Conduct and Monitoring and Remediation Procedure, which is valid wherever we do business, ethically guides those who work for us and on our behalf. We bolster continued procurement by never compromising on our integrity, safety and environmental sustainability. We only complete business transactions with responsible suppliers who understand the nature of the products or services they provide. Our main responsibility is to develop a sustainable business while respecting business partners, employees and society as a whole.

We do not tolerate corruption or bribery, and seek to eliminate all related activity that hinders economic and social development. We act in accordance with all applicable laws and do not, directly or indirectly, accept or solicit undue payments or other considerations that are given for the purpose of inducing action.

In our Supply Chain Code of Conduct and Monitoring and Remediation Procedure mandate we address:

- I. Environmental Standards
- II. Human Rights & Social Performance
- III. Inclusion & Diversity
- IV. Health & Safety Policy
- V. Ethical & Legal Requirements
- VI. Compliance

SUPPLY CHAIN CODE OF CONDUCT AND MONITORING AND REMEDIATION PROCEDURE:

I. Environmental Standards

Our commitment to the environment includes efficient use of resources and interior construction procedures, and strict compliance with all local and national environmental regulations. This commitment extends to all suppliers, contractors and any other business partners.

Our stakeholders are required to:

- i) Comply with all applicable laws and regulations of the countries in which they operate regarding environmental performance, and in full compliance with our Supply Chain Code of Conduct and Monitoring and Remediation Procedure.
- ii) Balance the social, economic and environmental aspects of their business, and minimize their negative impact on the environment.
- iii) Maintain a management system that encourages sound environmental practices that incorporates recognized environmental guidelines.

II. Human Rights & Social Performance

Our dedication to ethical business practices is in accordance with the law and we uphold these regulations to protect those who work for and with us. Our Human Rights & Social Performance policies must be shared by all of our contractors, vendors and suppliers.

All of our business partners are required to:

- i) Comply with all applicable laws regarding human rights and social performance. All stakeholders must be in strict compliance with our Supply Chain Code of Conduct and Monitoring and Remediation Procedure.
- ii) Treat all workers with dignity and respect, providing a safe and healthy working environment.
- iii) Never use any child or forced labor.
- iv) Never subject employees to discrimination. This includes verbal, sexual or physical harassment, or any other form of abuse.

III. Inclusion & Diversity

We retain diverse subcontractors, vendors and suppliers, and are committed to providing non-discriminatory treatment regarding hiring, training, compensation, promotion, termination and disciplinary action. We have a zero-tolerance policy for discrimination on the basis of age, culture, disability, education, gender, origin, sex, physical appearance, race or culture.

We mandate the same from our subcontractor, vendor and supplier companies.

IV. Health & Safety Policy

All suppliers, contractors and others with whom we conduct business must meet and document our Health & Safety Standards. We take all the steps necessary to ensure the health and safety

of employees, stakeholders and the public. Our Health and Safety Standards are in compliance with government legislation and our business partners must exhibit the same attention to and care for employee health and safety. Failure to comply with emergency and spill responses for hazardous materials, CFC regulations and proper disposal of hazardous materials will result in investigation and corrective action.

V. Ethical & Legal Requirements

We execute projects honestly and transparently to provide the highest quality and value to our clients. In order to foster the trust of our clients, we have established a comprehensive Anti-Corruption Policy that prohibits the solicitation or acceptance of gifts that may influence an employee's decision during the bid process or increase chances of business retainment.

Our subcontractor, vendor and supplier companies must:

- i) Comply with all applicable laws and regulations of the countries in which they operate regarding corruption and bribery, and in full compliance with our Supply Chain Code of Conduct and Monitoring and Remediation Procedure.
- ii) Disclose any relationship with a Verus Construction Services, Inc. employee or person working with Verus Construction Services that might represent a conflict of interest.
- iii) Keep efficient business records in matters relating to Verus Construction Services and provide copies on request.
- iv) Never engage in any form of bribery. Never offer incentive to any Verus Construction Services employees or employees' friends or families to influence a business decision.

VI. Compliance

We investigate any subcontractor, vendor and supplier company that does not comply with our Supply Chain Code of Conduct and Monitoring and Remediation Procedure. We are as thorough, fair and confidential as possible during investigations. Any business partners that are found to be non-compliant with the Supply Chain Code of Conduct and Monitoring and Remediation Procedure must implement timely corrective actions or business with this entity will be terminated.

Our subcontractors, vendors and supplier must:

- i) Sign and fully execute the Verus Construction Services General Services Agreement and fully comply with all applicable laws and regulations of the countries in which they operate. All business partners must be in full compliance with our Supply Chain Code of Conduct and Monitoring and Remediation Procedure.
- ii) Implement training, monitoring and auditing to provide compliance with relevant legislation and the principles set forth by our Supply Chain Code of Conduct and Monitoring and Remediation Procedure.

iii) Regulate and investigate themselves to ensure the Supply Chain Code of Conduct and Monitoring and Remediation Procedure policy is not being violated.