



**NEWFOUNDLAND LNG LTD.**

# **GRASSY POINT EMPLOYMENT EQUITY PLAN**

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## TABLE OF CONTENTS

	Page No.
<b>1.0 INTRODUCTION .....</b>	<b>1</b>
<b>2.0 THE PROJECT.....</b>	<b>1</b>
<b>3.0 THE PLANNING PROCESS .....</b>	<b>5</b>
3.1 Selection of Project Contractors.....	5
3.2 Selection of Contractors for Equity Planning Purposes .....	6
3.3 Equity Plan Responsibilities .....	6
3.4 Employment Equity Targets and Initiatives .....	6
3.4.1 Construction Phase.....	7
3.4.2 Operations Phase .....	8
3.5 Monitoring and Reporting.....	9
<b>4.0 ACTIONS.....</b>	<b>9</b>
4.1 Information and Communications .....	10
4.2 Employee Recruitment and Selection .....	10
4.3 Employee Development.....	11
4.4 Working Environments.....	11
4.5 Community Outreach .....	11

## LIST OF APPENDICES

Appendix A    SNC-Lavalin Human Resources Handbook and Code of Ethics

## LIST OF TABLES

	Page No.
Table 2.1 Schedule of Site Activities .....	2
Table 2.2 Occupations Required for the Construction Phase (Engineering and Design) .....	3
Table 2.3 Occupations Required for the Construction Phase (Trades).....	4
Table 2.4 Occupations Required for the Operations Phase.....	5

## 1.0 INTRODUCTION

This Equity Plan covers the construction, operations and decommissioning phases of the Grassy Point Liquefied Natural Gas (LNG) Project. It has been prepared in response to a condition for the release of the Project from provincial assessment, that 'an Employment Equity Plan must be submitted and approved by the Minister of Environment and Conservation prior to the start of construction'.<sup>1</sup>

The Plan is in three main sections. The first describes the Project and the occupations required for the construction and operations phases. This is followed by a description of the employment equity planning process, including: the responsibilities of Newfoundland LNG Ltd. and its main contractors; the process for identifying and implementing equity targets and initiatives, including the initial targets; and, the process whereby the implementation of those initiatives, and success in achieving these targets, are monitored and reported. The last section of the Plan identifies and describes possible initiatives that Newfoundland LNG Ltd. and its contractors can use to achieve employment equity for women.

## 2.0 THE PROJECT

Newfoundland LNG Ltd. proposes to develop a LNG Transshipment and Storage Terminal at Grassy Point, Placentia Bay, Newfoundland and Labrador, that will provide LNG to markets in the North Eastern United States (US) and Canada. The Terminal will provide facilities for LNG cargo transfer and storage, and a lay-up site for transiting LNG carriers. The marine facility will provide storage and loading capabilities for smaller or specialized carriers that are able to enter most LNG terminal ports in the US.

Newfoundland LNG Ltd. proposes to initially construct a marine terminal comprised of:

- One jetty/berth capable of handling LNG tankers of up to 265,000 m<sup>3</sup> capacity;
- A tug basin;
- One LNG storage tank;
- One reliquefaction system; and
- Supporting infrastructure including an access road, office facilities, security fencing, and utilities such as water, sewer, and power.

Additional facilities will be built over time in response to increased demand. There may ultimately be three jetties/berths, eight LNG storage tanks with a combined maximum storage capacity of 1.3 million m<sup>3</sup>, and additional reliquefaction units as required.

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<sup>1</sup> Government of Newfoundland and Labrador. Department of Environment and Conservation. Environmental Assessment Bulletin, January 19, 2007. St. John's: Department of Environment and Conservation, 2007.

The construction phase of the above Project will consist of the following activities:

- The construction of a 1.5 km access road to transport equipment, materials, and personnel between Arnold's Cove and the site;
- Preparation of the tank site. Trees will be cut with all merchantable timber salvaged. Overburden will be graded from the site and trucked to stockpiles which will be trimmed, levelled, reclaimed, and redeposited over developed areas in the future;
- Construction of one storage tank. It will be erected on foundations and construction materials will be brought to the site in pre-assembled pieces via a construction dock.
- Construction of one jetty/berth;
- Construction of a dedicated tug basin. Dredging may be required for the tug basin with all dredged material being disposed of on land, in accordance with provincial regulations; and
- Construction of one LNG reliquefaction system unit.

Depending on the availability and skill set of contractors at the time of construction, all contractors used for construction will be from Newfoundland and Labrador. The expected life of the Grassy Point LNG Transshipment and Storage Terminal is approximately 50 years.

**Table 2.1      Schedule of Site Activities**

Activity	Date
Detailed Design	Jan 2007 – May 2009
Procurement of Equipment	May 2008-June 2010
Site Preparation	May 2008-September 2008
Construction	June 2008-October 2010
Jetty/Berth Construction	June 2008-June 2009
Tank Construction	October 2008-September 2010
Mechanical Completion	October 2010
Start of Operations	December 2010

Newfoundland LNG Ltd. will be the overall manager of the Project during construction and operations. However, detailed design, site preparation, construction and work will be contracted out to existing local independent contractors. Operations will be carried out by Newfoundland LNG Ltd. staff, again supported by independent contractors. In the case of both construction and operations, there are a number of such contractors on the Avalon, Burin and Bonavista Peninsulas as a result of the region's long history in petroleum processing, transshipment, and construction and fabrication of major components for the Newfoundland and Labrador offshore oil and gas industry. As such, the Project will provide a continuity of existing local employment and business.

The required Newfoundland LNG Ltd. and contractor labour force for construction engineering and design, construction trades, and operations is described in Tables 2.2 – 2.4 respectively. Given the estimated 50-year Project life, it is not currently possible to forecast the methods used, and hence human resource requirements, for decommissioning.

**Table 2.2 Occupations Required for the Construction Phase (Engineering and Design)**

Occupation	NOC Code	# of People (Peak) <sup>2</sup>
Process Engineers	2134	4
Mechanical Engineer	2132	3
Civil/Structural Engineer	2131	4
Control Systems and Instrumentation Engineer	2133	2
Electrical Engineer	2133	2
Loss Prevention, Safety Engineer	2148	1
Designer (Drawing Office)	2252	12
CAD Operator	2253	12
Buyer (Procurement)	0113	1
Expeditor (Procurement)	1473	1
Document Controller	1413	1
Secretary	1241	2
Engineering Management	0211	4
Engineering Technologist	2232	12
HSEQ	2263	1
Project Management	0711	2
Project Controls	2131	2
Administration	1221	2
Architects	2151	1
Land Surveyors	2154	2
Civil Engineering Technologists	2231	2
Construction Estimators	2234	1
Senior Managers	0016	1
<b>Total</b>	<b>-</b>	<b>75</b>

All engineering and design work will take place either at the site or in St. John's.

<sup>2</sup> In this context, *peak* refers to the maximum number of employees required in each occupation. As such, the total employment refers to the total number of people employed over the course of the Project phase and should not be viewed as the peak number of employees at any point during that phase.

**Table 2.3 Occupations Required for the Construction Phase (Trades)**

Occupation	NOC Code	# of People (Peak)
Pipefitter	7252	20
Millwright	7311	10
Construction Management	0711	6
Scheduler	1476	1
Labourer	7611	80
Electrician	7242	40
Equipment Operator	7421	25
Pipe Welder	7265	10
Insulator	7293	30
Painter (Industrial)	9496	6
Carpenter	7271	20
Surveyors	2154	4
Plumbers	7251	2
Ironworker	7264	20
Welder - Structural	7265	20
Concrete Finisher	7282	10
Drywall Installers	7284	2
Heavy Duty Equipment Mechanics	7312	2
Crane Operators	7371	6
Drillers and Blasters	7372	2
Water Well Drillers	7373	2
Commercial Divers	7382	4
Truck Drivers	7411	6
Construction Supervisors – Electrical	7212	2
QA/QC - Inspectors	2233	12
Commissioning Personnel	2241	12
Construction Supervisors – Pipefitters	7213	2
Construction Supervisors – Carpentry	7215	2
Construction Supervisors – Other Trades	7219	2
<b>Total</b>	-	<b>420</b>

These construction phase requirements are based on the construction of one jetty/berth, one tank and one reliquefaction unit over a three-year period. During this phase, the estimated engineering and design employment and construction trades employment total 110 and 630 person-years respectively. The construction trade and engineering labour requirement for each additional tank and reliquefaction plant are 310 and 30 person-years respectively. When the design and construction of all additional jetties, tanks, and reliquefaction units are considered, the total construction trade and engineering labour requirements are estimated at 2830 person-years.

**Table 2.4 Occupations Required for the Operations Phase**

Occupation		NOC Code	# of People
<b>Management</b>	Plant Manager	9212	1
	Maintenance Manager / Coordinator	0721	1
	SH&E Manager	2263	1
<b>Maintenance</b>	Maintenance Superintendent	0016	1
	Reliability / Field Services / Mechanical and Instrumentation	2233	6
<b>Production</b>	LNG Operations / Shift Supervisor / Security	0721	4
	Marine and Security Coordinator	0721	2
	Plant Engineers – Mechanical / Electrical	2243	2
	Cross-Functional Operators	2262	24
	LNG Superintendent	1471	1
<b>Corporate Services</b>	Administrative Specialists	9212	3
	Accounting	0013	1
	Operations Schedule Planner	7242	3
<b>Sub -Total</b>			<b>50</b>
<b>Contract Employees</b>	Marine / Tugs	7436	30
	Linesmen (only on ship arrival and departure)	7451	6
	Security	6651	10
	Gauging	7612	2
	Grounds Maintenance	7612	5
	Electricians	7242	5
	Snow Clearing	7612	1
	Machinist	2243	1
	Cross Functional Mechanics	2243	6
	Cross Functional I & E	2243	3
	Operations Support	7612	5
<b>Sub-Total</b>			<b>74</b>
<b>Total</b>		-	<b>124</b>

### 3.0 THE PLANNING PROCESS

The Grassy Point Equity Plan process requires the involvement of Newfoundland LNG Ltd. and its Project contractors. This section of the Plan describes the planning process, including: the ways in which it is reflected in the selection of Project contractors; the involvements and responsibilities of contractors; equity targets and initiatives; and, monitoring and reporting.

#### 3.1 Selection of Project Contractors

Newfoundland LNG Ltd. is committed to employment equity. In support of this, it:

- Requires the same commitment from its contractors; and
- Will take into account employment equity considerations in the awarding of contracts.

All other things being equal, preference will be given to contractors employing women and/or with policies and practices that are supportive of employment equity. This Grassy Point Equity Plan, and hence this commitment and preference, will be attached to all Project requests for proposals (RFPs). Copies of all RFPs will also be provided to the Women and Resource Development Committee (WRDC) so it can alert prospective bidders.

SNC-Lavalin will be the main construction phase contractor, responsible for design and engineering, project management, and construction for the Grassy Point Project. It will be required to meet the goals and commitments outlined in the Grassy Point Equity Plan. SNC-Lavalin is also subject to the Government of Canada's Federal Contractors Program and, as such, has made a long-standing commitment to implement employment equity. To this end, all its sub-contractors will be required to adhere to both the Grassy Point Equity Plan and the equity plan outlined in SNC-Lavalin's Human Resources Handbook (Appendix I). The latter commits the SNC-Lavalin to respect all principles of employment equity and make sure that non-discriminatory practices are adopted in all employment-related systems. Key features of the plan include:

- Ensuring that non-discriminatory practices are adopted in all employment related systems;
- Evaluating statistics on the representativeness of designated groups (women, visible minorities, natives, and handicapped persons); and
- Forwarding employment statistics to federal and provincial governments as required by governmental contract compliance programs, which require that the company demonstrate progress in terms of human resources representativeness.<sup>3</sup>

### **3.2 Selection of Contractors for Equity Planning Purposes**

Newfoundland LNG Ltd. will identify its main contractors for employment equity planning purposes based on their share of project employment. This will normally be measured in terms of the person-years of employment involved. The list of main contractors will be reviewed and, as necessary, revised on an annual basis.

### **3.3 Equity Plan Responsibilities**

Newfoundland LNG Ltd. and each of the main contractors will identify a senior member of their staff responsible for implementing the Equity Plan. These individuals will form the membership of the Grassy Point Equity Committee, which will be chaired by the Newfoundland LNG Ltd. representative responsible for implementing the Plan.

Due to the relatively short duration of the construction phase, it is important that equity is a consideration of the Project employers from the outset. Experience with Husky Energy's White Rose Project has demonstrated the positive impact of employer engagement in making equity a priority throughout the project. This Project will be greatly assisted by having this Equity Plan in place in advance of the start of work. In addition, Newfoundland LNG Ltd. will liaise with the WRDC prior to and throughout the Project, including inviting the WRDC representatives to meet with the Grassy Point Employment Equity Committee within 60 days of Project sanction and periodically thereafter.

### **3.4 Employment Equity Targets and Initiatives**

Newfoundland LNG Ltd. has established overall targets for women's employment during construction and operations of the Project. These are based on, but significantly greater than, current women's participation rates in different Project occupations. These targets will be communicated to all potential and selected contractors. Decommissioning targets will be established at a later date.

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<sup>3</sup> SNC-Lavalin Human Resources Handbook. Employment Condition #6 (Equity Programs).



Newfoundland LNG Ltd. and each of its main contractors will identify actions for achieving the target levels of employment for women. When new main contractors are identified, they will identify and commit to, within one month of commencing work on the Project, the actions that they will take to promote employment equity for women.

### **3.4.1 Construction Phase**

The construction phase of the Project is of relatively short duration and will be more directly affected by the current state of the workforce and women's participation levels within it. Construction occupations have long had small proportions of women workers. In 2001, only 1% of the membership of the Newfoundland and Labrador Construction Trades Council were women, and labour force survey estimates show that women held just 3.4% of construction trades occupations in 2006.<sup>4</sup>

*Accordingly, Newfoundland LNG Ltd. has established an overall target of 10% for women's employment in construction trades and related occupations during the construction phase of the Project.*

Entry level positions have been identified as one of the keys to increasing women's participation in construction trades. By increasing employment among first and second year apprentices during the construction phase, Newfoundland LNG Ltd. and its major contractors will have an opportunity to change mindsets beyond the scope of the Project by increasing the percentage of women journeypersons available to industry.

*To this end, Newfoundland LNG Ltd. will work with the WRDC in order to establish appropriate targets for women's participation among First and Second Year apprentices in the construction trades.*

It is recognized that there are opportunities to significantly exceed these targets in some employment categories, and hence Newfoundland LNG Ltd. and its contractors will work with the WRDC in order to determine the employment categories where additional targets would be most appropriate.

The participation of women in design and engineering positions is also traditionally low. In 2006, Memorial University reported that women comprised only 20% of graduates from the Bachelor of Engineering program. Additionally, Professional Engineers and Geoscientists of Newfoundland and Labrador membership data show women comprise 22% of the student engineers but only 5% of Professional Engineers.<sup>5</sup>

*Based on this, Newfoundland LNG Ltd. has established a target of 20% for women's employment in Project design and engineering during construction.*

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<sup>4</sup> Statistics Canada. *Table 282-0008 Labour Force Survey Estimates (LFS), by North American Industry Classification System (NAICS), Sex and Age Group, Annual (Table)*. CANSIM (database). Using CHASS (distributor). Version updated April 20, 2007. <http://dc2.chass.utoronto.ca.qe2a-proxy.mun.ca/cansim2/> (accessed April 25, 2007).

<sup>5</sup> Canadian Coalition of Women in Engineering, Science and Technology. 'Consultation Briefing Summary, Eastern Canada Regional Consultation.' St. John's, NL, 2003.

### 3.4.2 Operations Phase

It is estimated that the operations phase of the Project will last about 50 years. This will provide Newfoundland LNG Ltd. and its contractors with greater opportunity to implement programs to increase women's participation. Oil and gas industries have traditionally employed relatively small numbers of women. A 2000 survey of 135 petroleum industry companies in Newfoundland and Labrador found that women's involvement was increasing, but they still only comprised about 1.5% of employees in male dominated occupations, with a range from 0.6% to 7.5%.<sup>6</sup>

The most recent employment data from Statistics Canada shows that although women represent approximately 47% of total employment across all industries, in occupations related to processing, manufacturing and utilities (including petroleum, gas and chemical processing), women's participation levels have been consistently between 30% and 34% since 1987.<sup>7</sup> Additionally, Statistics Canada reports that in 1998, women's enrollment in resource processing technologies (first year) for Newfoundland and Labrador was 31.6%.<sup>8</sup>

*Accordingly, Newfoundland LNG Ltd. has established a 40% target for women's employment in technology-related occupations by the end of the first five years of Project operations. To assist in achieving this target, Newfoundland LNG Ltd. has also established a target for Project start-up, which would see the initial women's employment levels being at least equal to the availability of women in technology-related occupational categories in Newfoundland and Labrador, as identified by the federal 2001 Employment Equity Data Report<sup>9</sup>.*

As the Project proceeds, revised targets will be established every five years in consultation with the WRDC and Women's Policy Office. These revisions will take into consideration women's participation in identified occupational groups as well as labour market conditions generally. It is expected that the equity initiatives established by Newfoundland LNG Ltd. and its major contractors will facilitate a significant increase in the number of women employed in these positions over the estimated 50-year life of the Project.

Operations phase employees will be provided training through a post-employment/on-the-job training program. This will provide Newfoundland LNG Ltd. an opportunity to incorporate targets for women's employment into the initial intake of employees. This has the potential to both significantly increase the opportunity for success in achieving overall targets for employment in the early phase of Project operations and to have a lasting impact on equity over its life.

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<sup>6</sup> Women in Resource Development Committee, 'Where are the Women? (They're Everywhere!): Report of a Survey of Companies in the Petroleum Industry, Newfoundland and Labrador' St. John's, NL, 2003.

<sup>7</sup> Statistics Canada. *Table 282-0009 Labour Force Survey Estimates (LFS), By National Occupational Classification For Statistics (NOC-S) And Sex*. CANSIM (database). Using CHASS (distributor). Version updated April 20, 2007. <http://dc2.chass.utoronto.ca.qe2a-proxy.mun.ca/cansim2/> (accessed April 25, 2007).

<sup>8</sup> Statistics Canada. *Table 477-0006 Full-Time Enrolments And Graduates In Postsecondary Community College Programs, By Program Field, Year In Program And Sex*. CANSIM (database). Using CHASS (distributor). Version updated April 20, 2007. <http://dc2.chass.utoronto.ca.qe2a-proxy.mun.ca/cansim2/> (accessed May 2, 2007).

<sup>9</sup> Human Resources and Skills Development Canada, '2001 Employment Equity Data Report', Ottawa, ON, 2004.

As in the case of construction, it is recognized that there are opportunities to significantly exceed these targets in some employment categories, and hence Newfoundland LNG Ltd. and its contractors will work with the WRDC in order to determine the employment categories where additional targets would be most appropriate.

Marine related positions are the highest single labour requirement in the operations phase of the project. The Marine Careers Secretariat (MCS) has identified gender equity as a key issue facing the marine industry in the immediate future. As a result, the MCS has identified a need to develop initiatives in order to:

- Tap into the large market that women represent;
- Effectively market marine careers towards women; and
- Create the conditions that will make marine careers choices more attractive to women.

Newfoundland LNG Ltd. will support the MCS in the development and implementation of initiatives with the goal of increasing the percentage of women in marine careers related to the Project and to the benefit of the marine industry generally.

### **3.5 Monitoring and Reporting**

The Grassy Point Equity Committee will meet at least every six months. This will include an initial meeting, which will be held within one month of Project sanction with additional meetings every six months thereafter.

At these Grassy Point Equity Committee meetings, Newfoundland LNG Ltd. and its main contractors will each: review its equity initiatives; discuss its success in implementing them; report on the employment equity of its current Project workforce, by main employment types (e.g. numbers and percentage who are managers, administrative staff, professionals and technicians, and others); and discuss the progress that has been made towards the established targets. Outside resource people, with specialist information about employment equity issues, may be invited to present to the Committee.

Within one month of each annual Grassy Point Equity Committee meeting, Newfoundland LNG Ltd. and its main contractors will compile an up-to-date list of equity initiative commitments, together with a short summary report on the employment equity of its current Project workforce. Newfoundland LNG Ltd. will maintain a file of these commitments and reports, which will be available to the Women's Policy Office.

## **4.0 ACTIONS**

This part of the Equity Plan identifies and describes required and optional actions that are designed to achieve employment equity for women. These are:

- Information and Communications;
- Employee Recruitment and Selection;

- Employee Development;
- Working Environments; and
- Community Outreach.

Newfoundland LNG Ltd. and its main contractors will consider these actions in their own employment equity planning. For each of them, this section of the Equity Plan provides a description of appropriate actions, based on best practice experiences elsewhere.

The scope and scale of actions required of each Project contractor varies according to such things as its size, current labour force composition and activities, and the policies and practices it has already implemented. Given these variations in the characteristics and circumstances of the companies, this part of the Equity Plan is generally not prescriptive, but instead indicates potential actions they should consider in their employment equity planning. Other possible initiatives may be identified by companies.

#### **4.1 Information and Communications**

Information content and its communication have a major role to play in achieving employment equity. Appropriate actions Newfoundland LNG Ltd. and its main Project contractors may take in addressing this topic include:

- Hold information sessions specifically targeted at women;
- Ensure women are equitably represented in text and illustrations the companies use for promotional, motivational and information purposes, including handbooks, newsletters, posters and websites; and
- Review all text they use internally and externally to see that it uses gender-inclusive language.

#### **4.2 Employee Recruitment and Selection**

The characteristics of the Project workforce will to some degree reflect those of the labour market as a whole and of prospective new entrants to it. However, the recruitment process can serve to either reinforce or counter any under-representation of women. There is, accordingly, a need to use recruitment procedures that actively encourage women to apply for all positions, including full-time, part-time, temporary and co-op student ones.

Newfoundland LNG Ltd. will include in Project-related job advertisements, and require all contractors advertising for positions largely or entirely related to the Project to include, statements encouraging applications from women. Copies of all job advertisements will be provided to the WRDC so that it can alert potential candidates.

Appropriate other actions Newfoundland LNG Ltd. and its main Project contractors might take in addressing this topic include:

- Establish guidelines for writing model job advertisements that aim to reach female candidates;
- Review job descriptions and collective agreements for the use of gender-inclusive titles and text;

- Establish relationships with training institutions and work with them to include female candidates in regular and co-op student positions;
- Implement a system to document outreach recruitment initiatives;
- Establish relationships with women's groups and work with them to identify and encourage female candidates; and
- Implement a system to monitor the gender of persons with resumes on file.

#### **4.3 Employee Development**

It is important that women be encouraged to develop, and assisted in developing, their capabilities and achieving promotion within the Project companies. Appropriate actions Newfoundland LNG Ltd. and its main contractors might take in addressing this topic include:

- Consider the participation of women in all training initiatives; and
- Develop a strategy to increase women's representation in management through mentoring, special assignments, management training, the creation of junior management bridging positions, and targeting specific management positions for women.

#### **4.4 Working Environments**

During both the construction and operations phase of the Project, Newfoundland LNG Ltd. will work diligently to create a work environment that is conducive to equity. Gender sensitivity training will be required by all Project and Contract employees. Newfoundland LNG Ltd.'s goal is to create a culture that fosters equity and is encouraged by successful implementation of the Equity Plan.

The work environment, and the presence of policies that address harassment and other concerns, can be critical to retaining women in the workforce. Appropriate actions Newfoundland LNG Ltd. and its main contractors might take in addressing this topic at Grassy Point Project workplaces include:

- Establish respectful workplace guidelines and a harassment policy;
- Establish, distribute and publicize the harassment policy and procedures; and
- Provide anti-harassment training for managers and supervisors.

#### **4.5 Community Outreach**

The numbers of women in and interested in entering, construction and technical occupations will be a significant constraint to the employment of women on the Grassy Point Project. In the longer term, this is best addressed by initiatives that promote such occupations to girls and young women. Appropriate actions Newfoundland LNG Ltd. and its main Project contractors may take in this area include:

- Participation in career days and facilitating workplace visits; and
- Financial contributions to, or having personnel serve as mentors or otherwise supporting, Techsploration and other WRDC programs.

## **APPENDIX A**

### **SNC Lavalin Human Resources Handbook and Code of Ethics**

[FRANÇAIS](#)

## MISSION

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SNC-Lavalin believes its employees are its most valuable asset. Our human resources policies and programs underscore our commitment to ensuring employment equity and fairness, promoting professional growth and fostering adaptability to change.

These programs and policies are applicable primarily to SNC-Lavalin Inc. employees working in Canada. They also serve as general guidelines for business units elsewhere in the world. By having similar yet flexible and locally-adapted people management policies, we can ensure that our clients see us as a single multi-geographic, multi-disciplinary group committed to the success of their projects.

At SNC-Lavalin, we encourage you to further your professional skills and talents in order to grow personally and meet challenging work opportunities. Each of you has a unique contribution to make the success of our company a success from which we all stand to benefit.

The programs and policies described in the Human Resources Handbook may be modified depending on need and such changes will be communicated as warranted. In the meantime, please do not hesitate to ask your immediate supervisor or local Human Resources representative should you have any further questions regarding the information contained in this site.

Diane Nyisztor  
Vice-President,  
Corporate Human Resources

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Revised : 2005-12-07 - Author : Diane Nyisztor  
Webpublisher : Monique Paradis  
[Contact us](#)  
UCC : © SNC-Lavalin Inc.

FEDERAL CONTRACTORS PROGRAM  
CERTIFICATE OF COMMITMENT  
TO IMPLEMENT EMPLOYMENT EQUITY

SNC-Lavalin Inc.

Name of Organization

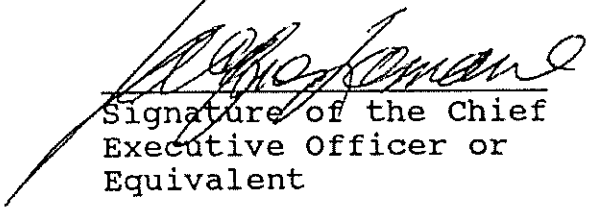
The above-named organization hereby certifies its commitment to implement employment equity when both of the following conditions apply:

1. the organization has a Government of Canada goods or services contract worth \$200,000 or more;

AND

2. the organization has 100 or more permanent full-time and/or permanent part-time employees.

In such circumstances, the organization undertakes to implement employment equity in keeping with the Criteria for Implementation. This document, duly signed by the chief executive officer, constitutes a Certificate of Commitment which, under the Federal Contractors Program for Employment Equity, is a prerequisite for the validation of bids submitted in the circumstances listed above.

  
Signature of the Chief  
Executive Officer or  
Equivalent

February 1997

Date

Jacques Lamarre  
Please Print Name and  
Title

Service Industries  
Industrial Sector

455 René-Lévesque Blvd. West

3816  
Number of Employees

Montreal (Quebec) H2Z 1Z3  
Address and Postal Code

(514) 393-1000  
Telephone



## EMPLOYMENT CONDITIONS

### 5. Curriculum Vitae

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SNC-LAVALIN mainly offers professional services. When we submit a proposal, we present, in addition to the company's qualifications, those of the employees likely to work on the project involved. In order for the competence of proposed project teams to be fairly evaluated, it is vital that we have up-to-date, accurate and specific information on each of our employees and that the presentation be uniform throughout all the company's divisions and business units.

Your curriculum vitae (CV) is the basis of our corporate CV bank, called the Resume Pool through which the company accesses all its employees' expertise, past and present, in order to fill the requests generated by proposals.

This CV is also used for internal purposes, so that other divisions or project managers having staff requirements can ascertain your skills and expertise. A copy of each internal CV is kept in the Resume Pool.

For these purposes, you may be asked to transpose your CV into the standard SNC-LAVALIN format. The person coordinating the CVs in your division can provide you with further instructions on this matter.

From time to time, a control copy will be sent to you so that you can inform us of any changes that occurred since the last update. It is also advisable to update your CV before the end of a long-term assignment or once a year, if on short-term assignments. In all cases, resumes must be current: your last CV update should not be more than two years old.

### 6. Equity Programs

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SNC-LAVALIN is committed to respecting all principles of employment equity. This means that the company makes sure that non-discriminatory practices are adopted in all employment-related systems.

These programs have the objective of preventing discrimination based on race, ethnic origin, ancestry or nationality; colour of skin, religion, age, sex, family, social or marital status; pregnancy, language, profession, pardoned conviction, sexual orientation, political conviction; membership in a non-prohibited organization, handicap or the equipment used to overcome this handicap, or any other reason.

To evaluate the company's performance in this regard, statistics are compiled on the representativeness of the following government-designated groups: women, visible minorities, natives and handicapped persons. The form you fill out for this purpose is used to keep statistical track of developments involving these groups. It is kept separately in your Human Resources Department and is used strictly to that end.

The statistical compilation of our representativeness in these four designated groups is forwarded to the federal and provincial governments as required by governmental contract compliance program. In these programs, the company must demonstrate to governments the accomplished progress in terms of our human resources representativeness, compared to the manpower available within each region. Our compliance to these programs is very important as it is part of their conditions on good and service contracts tenders.

CODE OF ETHICS  
AND BUSINESS CONDUCT



**SNC • LAVALIN**

# CODE OF ETHICS AND BUSINESS CONDUCT

## Table of Contents

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MESSAGE FROM THE PRESIDENT & CHIEF EXECUTIVE OFFICER.....	I
MISSION.....	1
INTRODUCTION .....	1
CODE OF ETHICS AND BUSINESS CONDUCT .....	2
Integrity in All Our Relationships .....	2
Insider Information and Proprietary Information.....	4
Compliance with Sound Accounting Practices and Record Maintenance .....	5
Conflict of Interest and Related Matters.....	6
Competition Laws.....	8
Political Contributions.....	8
External Communications .....	9
Drug and Alcohol Use .....	9
Solicitation of SNC-Lavalin Employees.....	9
Electronic Information Exchange .....	9
Corporate Assets .....	10
CONCLUSION .....	10
Compliance and Interpretation .....	10
ACKNOWLEDGEMENT OF RECEIPT .....	11

*Note: In this document, reference to "SNC-Lavalin" or "Company" means, as the context may require, SNC-Lavalin Group Inc. and all or some of its subsidiaries or affiliates, or SNC-Lavalin Group Inc., or one or more of its subsidiaries or affiliates.*

# CODE OF ETHICS AND BUSINESS CONDUCT

## **MESSAGE FROM THE PRESIDENT & CHIEF EXECUTIVE OFFICER**

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Dear Colleagues:

At SNC-Lavalin, we have always considered our integrity, reputation for ethical practices and respect for individuals to be among our most valued assets. For over 90 years, we have worked together to maintain and foster SNC-Lavalin's multicultural character, and its ability to adapt to cultures wherever we do business. Our reputation and performance around the world depend on integrity and ethical conduct in dealings with clients, employees, shareholders, associates, vendors, communities and governments.

This is the essence of SNC-Lavalin's culture. This is what we stand for when we work with clients and in our relationships with employees, shareholders, communities and other stakeholders. I encourage you to keep these principles in mind as we work together towards achieving our strategic goals. Your actions are a crucial and essential part of how we do business.

I invite all of you to read this Code of Ethics and Business Conduct and ensure that it is reflected in your day-to-day work. Together, we will continue to prosper and confirm our leadership in this all important area.

Sincerely,

Jacques Lamarre  
President & Chief Executive Officer

# CODE OF ETHICS AND BUSINESS CONDUCT

## MISSION

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SNC-Lavalin's mission is to maintain and strengthen its core engineering businesses, to develop new skills and activities, and to respond to the changing needs of clients and markets while remaining mindful of our responsibility to work towards a better world. SNC-Lavalin's strategy for sustained growth is anchored in the development of world-class products, its far-reaching international network and its financing capabilities.

## INTRODUCTION

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Our policy is to maintain ethical standards in the conduct of our business and in our relations with whomever we associate — our colleagues, directors, shareholders, customers, associates and suppliers, as well as governments, the public and the media. Our integrity and reputation for ethical practices are among our most valued assets and are essential aspects of our sustained profitability.

### **"Everyone is involved"**

This Code applies to all members of the Boards of Directors and to all officers and employees of SNC-Lavalin in Canada and abroad. Each is personally responsible and accountable for compliance with this Code as a condition of membership or employment.

Social values, laws and customs may differ throughout the world and detailed interpretation of some of the Code's provisions may vary from country to country. The Code's underlying principles and basic rules are sound, relevant and applicable everywhere in conjunction with the customs and statutes of the relevant jurisdictions.

SNC-Lavalin is committed to supporting worldwide efforts to develop industry-wide principles and practices aimed at creating a level playing field based on integrity, fairness and ethical conduct.

### **"We can all make a difference"**

As directors, officers and employees, we all share certain responsibilities regarding this Code, and each one of us is accountable for his or her actions. We can make a difference by strictly adhering to, and applying the following principles:

- We adhere to and respect SNC-Lavalin's standards for the safe operation of facilities and the production of safe products.
- We respect our environmental commitments as presented in our Company's Environmental Policy.
- We treat our customers and suppliers honestly and fairly by conducting SNC-Lavalin's business in compliance with applicable laws and by avoiding situations where personal interests are, or may appear to be, in conflict with the interests of SNC-Lavalin and those of our partners and our customers.
- We safeguard and use SNC-Lavalin's proprietary information, assets and resources and those entrusted to the Company by other organizations, in a respectful manner.

## CODE OF ETHICS AND BUSINESS CONDUCT

- We maintain the confidentiality of non-public information and condemn the use of such information for personal gain.

Underlying these basic responsibilities is the belief that we must maintain respect for the dignity of the individual and ensure that everyone is treated fairly.

### **"Knowing where you stand"**

SNC-Lavalin's operations are subject to many complex and changing laws, which may vary considerably from jurisdiction to jurisdiction. Ignorance of the laws does not excuse actions that contravene such laws.

When uncertain about the application or interpretation of a law or regulation, consult your supervisor, who can seek help from Corporate Human Resources or Legal Affairs, if necessary. Difficulties can usually be avoided or minimized if this is done at the start of business dealings, rather than later on in the process.

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## CODE OF ETHICS AND BUSINESS CONDUCT

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### **Integrity in All Our Relationships**

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#### **Towards Our Employees**

**"Providing and maintaining a work environment that is free from discrimination and harassment, and that protects the health, safety and dignity of every employee"**

SNC-Lavalin is committed to providing and maintaining a work environment that is free from discrimination and harassment, and one that protects the health, safety and dignity of all employees. We offer salary levels, compensation practices and benefits packages that are competitive with leading companies in our business sectors.

#### **Discrimination and Harassment**

We initiate appropriate measures to prevent acts or behaviours in the work environment that are of a discriminatory or harassing nature and work to promptly resolve issues in a respectful manner. We enforce a workplace that is free from discrimination and harassment, and encourage individuals to come forward with complaints of discrimination and/or harassment without fear of reprisal or of the inappropriate disclosure of information.

#### **Health and Safety**

The health and safety of our employees is one of our primary concerns and responsibilities. We ask employees to follow safety laws and regulations applicable to their workplaces. We also encourage everyone to report accidents, environmental concerns and dangerous or potentially dangerous situations and to behave in a responsible manner that reflects the Company's health and safety philosophy and policy at all times.

#### **Communication**

We continually strive to provide our employees with up-to-date information on business results, product performance, customer relations and employee achievements. We also encourage employees to openly express opinions, suggestions or concerns they may have regarding the Company and its operations.

# CODE OF ETHICS AND BUSINESS CONDUCT

## **Human Rights**

SNC-Lavalin is an equitable employer that operates within a framework that promotes respect for human rights and fundamental freedoms and conformity with applicable labour legislation.

## **Employee Privacy**

SNC-Lavalin is committed to respecting the privacy of its employees. However, if an employee's conduct impairs his or her work performance, or affects the reputation or legitimate business interests of SNC-Lavalin, it becomes a corporate concern. We expect our employees and representatives to be conscious of the Company's reputation as well as their own, and to conduct themselves with the same high degree of integrity off the job as is expected of them on the job.

## **Towards Our Shareholders**

### **"Protecting your investment"**

SNC-Lavalin uses sound management practices aimed at maintaining the highest standards of legal and ethical conduct within all our business dealings. We provide a superior return on shareholder investments by our judicious use of corporate resources.

We are dedicated to maintaining effective communication with shareholders and to providing them with the information they need to evaluate our management practices and the value of their investment. We encourage our shareholders to take an interest in SNC-Lavalin's affairs and to develop informed opinions on business issues.

## **Towards Our Suppliers, Vendors, Subcontractors and Associates**

### **"Building long-lasting business relationships based on fair competition"**

SNC-Lavalin deals fairly with its suppliers, vendors, subcontractors and associates, and encourages fair competition, without discrimination or deception.

The "Conflicts of Interest and Related Matters" section of this Code shall guide employees who deal with suppliers or potential suppliers.

## **Towards Our Clients**

### **"Clients first"**

Client satisfaction is central to SNC-Lavalin's continued success. SNC-Lavalin makes every effort to understand its clients' and customers' requirements and concerns and to respond to them, efficiently, fairly and equitably.

SNC-Lavalin provides quality products and services that comply with safety, health and environmental protection standards, at competitive terms and prices. We promote our products and services honestly, based on their merits, and do not pursue transactions that require us to act unlawfully or in violation of these standards.

## **Towards Our Competitors**

### **"Adopting fair and intelligent competitive practices"**

SNC-Lavalin follows sound and fair competitive practices. To maintain our competitive edge in the engineering, operations and facilities management, and construction industries, we must understand our

## CODE OF ETHICS AND BUSINESS CONDUCT

competitors' strategies and products and benchmark effectively against them. We use all legitimate resources in collecting information about our competitors.

### **Towards Our Communities**

#### **"Supporting communities through corporate citizenship"**

SNC-Lavalin supports organizations and activities in communities where we work worldwide. We abide by applicable national and local laws, and we strive to improve the well-being of communities by encouraging employee participation in civic affairs and by supporting worthwhile civic and charitable causes.

### **Towards Our Environment**

#### **"Safeguarding the environment"**

SNC-Lavalin adopts practices aligned with applicable laws and regulations to protect the environment and provides additional protection when we believe it is necessary. In regions where laws and standards may be incomplete, we apply international practices to ensure we achieve our environmental objectives. This includes working with industry associations, government agencies, and academic and public groups to develop a consensus on desirable and attainable environmental standards and regulations.

### **Insider Information and Proprietary Information**

#### **"Preserving the confidentiality of information"**

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Employees, officers and Directors shall not, without proper authority, divulge any confidential or proprietary information of or about the Company to anyone not employed by SNC-Lavalin or to another colleague who has no need for such information. Disclosure of financial information, for example, can be harmful to SNC-Lavalin and may create legal problems.

Our policies, as well as relevant legislation, forbid the use of information that has not been disclosed to the public for the purpose of trading in SNC-Lavalin Group Inc.'s shares. Employees with privileged information pertaining to significant changes in the Company's position or business strategies must not use this information for trading purposes or provide non-public information to others. The type of information to which this section refers includes significant new products, sales and earnings figures, plans for dividend changes or new financing, acquisitions, or major new contracts or other financial matters. Employees, officers and Directors of SNC-Lavalin are responsible for safeguarding this non-public information and respecting any proprietary and confidentiality conditions that may exist.

Employees may occasionally become aware of similar information of or about suppliers, customers or competitors, which is not generally known to the public. It is against our policy to take personal advantage of this knowledge.

Employees are not to divulge the proprietary information of their former employers. Employees and former employees must not disclose proprietary information of customers or suppliers unless the disclosure of that information is properly authorized by the individual or firm owning the information.

SNC-Lavalin's officers are legally required to report all SNC-Lavalin Group Inc. securities trading. Guidance on the appropriate procedures is available from the Vice-President, Legal Affairs.



## CODE OF ETHICS AND BUSINESS CONDUCT

Employees shall not acquire real estate, which they know SNC-Lavalin is interested in acquiring. Employees shall not use advance information to acquire any nearby property for speculation or investment without the specific prior approval of the Vice-President, Legal Affairs.

### **Compliance with Sound Accounting Practices and Record Maintenance** **"Accurately reflecting our business transactions"**

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We all have a responsibility to ensure that SNC-Lavalin's books and records accurately and punctually reflect the Company's transactions, assets and liabilities. We adhere to a proper application of accepted accounting standards and practices, rules, regulations and controls. These commitments include the following:

- Business records, expense reports, invoices, vouchers, payrolls, employee records and other reports are prepared with care and honesty and in a timely fashion.
- All transactions are conducted at the level of authority required by SNC-Lavalin policies and procedures and in compliance with applicable rules and regulations.
- No transaction, asset, liability or other financial information is concealed from management or from SNC-Lavalin's internal and external auditors.
- All efforts are made to resolve all issues and concerns raised in internal and external audit reports.
- Any known inaccuracies, misrepresentations or omissions are disclosed to our customers and suppliers and promptly corrected through credits, refunds or other mutually acceptable means.
- All documents signed are, to the best of our knowledge, accurate and truthful.
- False or misleading entries and unrecorded bank accounts, for any purpose, whether regarding sales, purchases or other Company activity, are strictly prohibited.
- No secret or unrecorded cash funds or other assets are established or maintained for any purpose.
- Unusual financial arrangements with a customer or a supplier (such as over-invoicing or under-invoicing) are prohibited.
- Access to sensitive or confidential information is restricted to ensure that it is not accidentally or intentionally disclosed, modified, misused or destroyed.
- Use of Company funds or assets for any unlawful or improper purpose is strictly prohibited, and those responsible for the accounting and record-keeping functions are expected to be vigilant in ensuring enforcement of this prohibition.

The above list is by no means exhaustive. Suspected breaches of our accounting practices and record maintenance and internal controls that appear to be in violation will be investigated.

## CODE OF ETHICS AND BUSINESS CONDUCT

### **Conflict of Interest and Related Matters**

#### **"Acting in the best interest of the organization and preserving independence of thought and action"**

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Employees should avoid situations that may involve a conflict between their personal interests and SNC-Lavalin's interests. In dealing with current and potential customers, suppliers, partners, contractors and competitors, employees should act in SNC-Lavalin's best interests. Each employee should immediately inform management of situations which may involve a conflict of interest. These include:

- Ownership by an employee, or a family member, of a significant financial interest in an outside enterprise, which does or seeks to do business with or is a competitor of SNC-Lavalin. (Real estate and mineral interests are particularly sensitive.)
- Serving as a director, officer, partner, consultant or in any other key role in an outside enterprise, which does or seeks to do business with or is a competitor of SNC-Lavalin.
- Acting as a broker, finder or other intermediary for the benefit of a third party in transactions involving SNC-Lavalin or its interests.
- Accepting any gifts, commissions or payments other than those stipulated in this Code.
- Using or disclosing, to the prejudice of SNC-Lavalin or for personal gain, any information on decisions, bids, plans or other matters concerning SNC-Lavalin as stipulated in this Code.
- Any other arrangement or circumstance, including family or other personal relationships, which might dissuade the employee from acting in SNC-Lavalin's best interests.

### **Gifts, Favours, Entertainment and Payments Received by Employees**

Employees are expected to take action and make decisions based on an impartial and objective assessment of each situation, free from the influence of gifts and similar favours that might compromise judgment. SNC-Lavalin avoids both the fact and the appearance of improperly influencing relationships with the organizations or individuals with whom it deals.

Employees shall not seek or accept gifts, payments, fees, services, valuable privileges, vacations, trips without a business purpose, loans (other than conventional loans from lending institutions), or other favours, from any person or business organization that does business with or is a competitor of SNC-Lavalin, except as provided below.

No employee can accept anything of value in exchange for referral of third parties to any such person or business organization.

The following guidelines should be followed:

- Employees may accept gifts and entertainment usually associated with accepted business practices for themselves and members of their families if:
  - ↳ they are infrequent;
  - ↳ they legitimately serve a definite business purpose;
  - ↳ they are appropriate to the business responsibilities of the individuals involved;
  - ↳ they are within the limits of reciprocity as a normal business expense.

## CODE OF ETHICS AND BUSINESS CONDUCT

Employees should neither give nor receive gifts with more than a nominal value. Employees must inform their immediate superior of gifts and entertainment received within a reasonable period not exceeding one (1) month from receipt.

- A strict standard is expected with respect to gifts, services or considerations of any kind from suppliers. Entertainment at the expense of suppliers, which exceeds the limits set out in the guidelines presented above, should not be accepted in any circumstances. Suppliers are reminded periodically of this corporate policy.
- It is never permissible to accept a gift in cash or cash equivalents (i.e. stocks or other form of marketable securities) of any amount.
- It is recognized that in certain countries, refusal of personal gifts with a value substantially in excess of accepted Canadian business practices could result in awkward business situations. The propriety of employees keeping such valuable gifts for personal use versus turning them over to SNC-Lavalin should be discussed with Corporate Human Resources.

### **Gifts, Favours, Entertainment and Payments Given by SNC-Lavalin**

Gifts, favours and entertainment may be given to others at SNC-Lavalin's expense only if they meet all of the following criteria (if made by an agent of SNC-Lavalin, prior SNC-Lavalin approval is required):

- They are consistent with accepted business practices.
- They are of sufficiently limited value, and in a form that could not be construed as a bribe or payoff.
- They are not in violation of applicable laws and generally accepted ethical standards.
- Public disclosure of the facts will not embarrass SNC-Lavalin.

### **Outside Business Activity**

Employees considering or already engaged in any outside business or income-producing activity should be aware of the following possible points of conflict:

- While employed with SNC-Lavalin, employees are expected to primarily devote their efforts to their employment at SNC-Lavalin.
- Employees may not participate in outside business or financial activities that compete or potentially compete with SNC-Lavalin.
- Employees may not participate in an outside business that supplies services or has business dealings with SNC-Lavalin where there is the possibility of preferential treatment being received by virtue of the employee's position.
- Employees should not conduct business on behalf of SNC-Lavalin with a member of their family, or a business organization with which they or a member of their family have an association, which could be perceived as significant in terms of potential conflict of interest, unless such business dealings have been disclosed to SNC-Lavalin prior to any arrangement, and a specific non-objection decision has been given.
- While employed with SNC-Lavalin, employees should not serve as a director, partner, consultant, or in a managerial position with, or be employed in a technical capacity by, an unaffiliated business organization, whether or not that organization does significant business with or is a competitor of SNC-Lavalin, without advising their Human Resources representative of such plans before starting the activity. Where the potential for conflict of interest exists, prior specific approval of SNC-Lavalin should be obtained.

## CODE OF ETHICS AND BUSINESS CONDUCT

- SNC-Lavalin employees participating in an outside business activity may not use SNC-Lavalin's time or facilities (i.e. photocopying, stationery, stenographic services, etc.) for the benefit of such business.

In addition, employees are reminded that, if the subject matter of the outside business activity relates in any way to their work for SNC-Lavalin or if it arises from confidential information acquired in the course of employment with SNC-Lavalin, then all inventions, products, processes and ideas that the employee has developed may belong to SNC-Lavalin. An employee may be required to sign documents showing ownership by SNC-Lavalin.

Responsibility for avoiding conflicts of interest or the perception of conflicts of interest arising from outside activities lies with the individual employee. If in doubt, employees must discuss the situation with their Human Resources representative. It is expected that employees will act in the best interests of SNC-Lavalin.

### **Consultants, Representatives and Agents**

When it is necessary to engage the services of an individual or a firm to consult for or otherwise represent SNC-Lavalin, consideration must be given to avoiding conflicts of interest between SNC-Lavalin and the person or firm to be employed. Consultants, representatives and agents of SNC-Lavalin must not act on SNC-Lavalin's behalf in any way that is inconsistent with this Code or the applicable laws or regulations.

### **Competition Laws**

#### **"Believing in the benefits of open competition"**

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The global activities of SNC-Lavalin are subject to the competition laws of various countries. In general, competition laws prohibit agreements or actions that may restrain trade or reduce competition. Violations include agreements among competitors to fix or control prices; to boycott specified suppliers or customers; to allocate products, territories or markets; or to limit the production or sale of products. Care must be exercised to ensure that dealings with representatives of other companies are not viewed as a violation of competition law. Canada's competition law is set forth in the *Competition Act* (Act), a federal law of general application throughout the country. SNC-Lavalin fully subscribes to the purpose of and follows a policy of strict compliance with the Act.

Employees should ensure that the Act and the competition laws of other countries are respected at all times. Because of the complexity of competition laws, the advice of Legal Affairs should be sought on any questions about this subject.

### **Political Contributions**

#### **"Restricting political contributions to oneself"**

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Contributions to political parties or to candidates for political office by corporations are permitted in certain Canadian jurisdictions and prohibited in others. Legislative requirements should be strictly adhered to. Requests for contributions addressed to employees should remain a personal decision.

# CODE OF ETHICS AND BUSINESS CONDUCT

## **External Communications** **"Sharing opinions with discernment"**

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Opinions or information sought by outside groups or organizations should be channelled through the Public Affairs Department for response. Employees who give opinions to such outside interests on matters not related to the affairs of SNC-Lavalin are reminded that their comments are strictly personal and they should therefore be cautious not to compromise SNC-Lavalin.

The Public Affairs Department is the official contact with any member of the media seeking an interview, an opinion, a comment or a suggestion about any subject that is likely to affect the business of SNC-Lavalin.

## **Drug and Alcohol Use** **"Preserving lucidity at work"**

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SNC-Lavalin companies, offices and representatives, both domestic and outside Canada, abide by applicable laws and regulations governing the possession or use of alcohol and drugs. Corporate practice prohibits the illegal use, sale, purchase, transfer, possession or presence in one's system of drugs, other than medically prescribed, while on SNC-Lavalin premises.

Similarly, SNC-Lavalin policy prohibits the use, sale, purchase, transfer or possession of alcoholic beverages by employees while on SNC-Lavalin premises, except as authorized by SNC-Lavalin.

## **Solicitation of SNC-Lavalin Employees** **"Soliciting others with parsimony"**

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In the interest of the orderly and efficient operation of our business, it is necessary to restrict the soliciting and distributing of material to employees.

Solicitation of SNC-Lavalin employees or distribution of material of any kind to them must have the prior approval of SNC-Lavalin management. (Exceptions will be permitted only when required by local laws or government regulations.)

Such facilities as internal mail and bulletin boards are for SNC-Lavalin business and sponsored activities, and must be restricted to those activities, unless approved by management. Distribution of SNC-Lavalin employee lists is on a "need-to-know" basis. Such lists are for SNC-Lavalin use only and are not to be released outside SNC-Lavalin.

## **Electronic Information Exchange** **"Providing electronic tools for professional purposes"**

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The electronic mail system, the intranet (Infozone or other), Internet access and information technology assets are company-owned resources and are provided to users for professional purposes.

# CODE OF ETHICS AND BUSINESS CONDUCT

Every user must be acquainted with SNC-Lavalin policies on "Electronic Information Exchange" and on "Use of Technology Assets" and comply with these policies. These policies apply to all users.

The Vice-President, Global Information Technologies and Project Management Systems is, in conjunction with Corporate Human Resources, responsible for overseeing compliance with these policies and for taking the necessary measures to ensure their application.

## **Corporate Assets**

### **"Respecting the assets and facilities of the organization"**

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The abuse or misuse of SNC-Lavalin property leads to increased costs and inconvenience to employees. SNC-Lavalin ensures that employees individually and collectively show respect for and accept responsibility for the proper use and protection of its assets and facilities.

## **CONCLUSION**

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This Code sets out the Company's ethical business conduct standards. It may not cover every situation encountered. Use of sound judgement is thus prescribed.

## **Compliance and Interpretation**

### **"Acting as a role model"**

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As a condition of membership and of employment, we expect all members of the Board of Directors and all officers and employees of SNC-Lavalin to comply with SNC-Lavalin's Code of Ethics and Business Conduct and underlying policies and procedures. We encourage employees to discuss any situations of existing or potential non-compliance, involving themselves or others. When in doubt, employees have the responsibility to seek clarification from their line management or, if necessary, from Legal Affairs, Corporate Human Resources or the Internal Auditor. Violations of these standards are grounds for disciplinary action, up to and including dismissal and legal prosecution.

# CODE OF ETHICS AND BUSINESS CONDUCT

## **ACKNOWLEDGEMENT OF RECEIPT**

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All members of the Board of Directors and all officers and employees of SNC-Lavalin in Canada and abroad must acknowledge receipt of this Code of Ethics and Business Conduct and their understanding of its contents.

### **ACKNOWLEDGEMENT OF RECEIPT**

I, [insert name in capital letters] \_\_\_\_\_ acknowledge that I have received a copy of SNC-Lavalin's Code of Ethics and Business Conduct.

I acknowledge having read this Code and that I understand its terms and contents. I understand that any breach of this Code may result in administrative and/or disciplinary measures, up to and including dismissal and legal prosecution.

Signature

Date