

POLICY S3.55.21 Human Rights Policy

1. Purpose

Kenaidan supports human rights at all levels of our business and is committed to creating an environment where human rights and personal dignity are upheld and protected and to address human rights impacts as per the UN Guiding Principles on Business and Human Rights.

This policy sets out Kenaidan's commitment to respect all internationally recognized human rights standards, which is guided by the International Bill of Rights and the International Labour Organization's Declaration on the Fundamental Principles and Rights at Work.

2. Scope

The policy applies to all entities in Kenaidan Group Ltd including Kenaidan Contracting Ltd, KenWave Solutions Inc, and Kenaidan Infrastructure Ltd as well as all stakeholders who act on our behalf anywhere in the world including, without limitation, employees, officers, directors, consultants, agents, contractors, and suppliers.

3. Definitions

Human Rights - rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status.

Child labour: the provision or offering of labour or services by individuals under the age of 18, under conditions that violate Canadian laws, pose mental, physical, social, or moral dangers, disrupt schooling, or involve the worst forms of child labour outlined in the Worst Forms of Child Labour Convention, 1999.

Forced labour: labour or services provided or offered under circumstances where the individual reasonably believes their safety or that of someone they know would be

threatened if they failed to provide or offer to provide the labour. Additionally, it encompasses forced or compulsory labour as defined in Article 2 of the Forced Labour Convention, 1930.

Human Rights Violations – include, without limitation, (i) any violation of this human rights policy, and (ii) actions, omissions, circumstances and/or events that harm a person's Human Rights (e.g., forced labour, child labour, human trafficking, discrimination, workplace violence, workplace harassment, etc.).

Stakeholders – include employees, officers, directors, consultants, agents, contractors, and suppliers.

4. Responsibilities

Management:

- Promote an environment where the Human Rights of any stakeholder are protected and respected.
- Investigate and address issues or complaints about Human Rights Violations in a timely manner.
- Enforce the implementation of Human Rights Policy and ensure timely and effective resolution of reported human rights violations.

Human Resources:

- Oversee all Human Rights Matters including enforcement, training, and addressing complaints.

Employees:

- Follow all policies that are in place for (i) protecting human rights, (ii) preventing discrimination, (iii) promoting diversity and equal treatment of persons with disabilities.
- Immediately report to Management incidents and/or knowledge of any Human Rights Violations.

5. Policy

Kenaidan is committed to treating all employees fairly, ethically and with dignity and we strive to protect all employees from harassment, discrimination, bullying and victimization in the workplace. Kenaidan's commitments to diversity, anti-discrimination and accessibility for its employees are set out in our policy S3.55.2 Positive Work Environment – Diversity, Anti-Discrimination and Accessibility.

Kenaidan does not support and will not engage in the use of child labour or forced labour at any of our operations, and we abide by all applicable laws including applicable laws and international standards regarding minimum age for employment and forced or compulsory labour.

We expect our stakeholders to operate their businesses with a respect for Human Rights and to take all necessary steps to eradicate child labour or forced labour from their supply chains and business operations. Kenaidan ensures that this is a contractual requirement for these stakeholders to do business with us.

Kenaidan employees are required to attend an internal recertification session every 3 years covering this policy.

6. Grievance Mechanisms

Stakeholders are asked to report any known or suspected violation of this policy, in confidence, Human Resources, Executive Management, External Counsel (ref. S3.55.17 Whistle Blowing) or Obayashi North America.

Complaints should be submitted in writing to ensure a clear understanding of the improper activity disclosed. The complaint should include as much information as possible about the issue and any witnesses who may be aware of the issue should be identified.

Management commits to investigating all reported Human Rights Violations as quickly and efficiently as possible. All issues will be treated in a confidential and sensitive manner whenever possible. Disclosure of the complaint will only be made to individuals who need to know in order to properly carry out the investigation.

Reprisals

This policy prohibits any form of reprisal against an employee who, in good faith, reports a known or suspected violation of this policy. Reprisals include but are not limited to any of the following: hostility, exclusion, termination of employment.

7. Records

n/a

8. Measures

n/a

9. References

C5.2.19 Positive Work Environment – Prevention of Workplace Violence & Harassment

S3.55. Positive Work Environment – Diversity, Anti-Discrimination and Accessibility

S3.55.15 R2 Accessibility Standards

S3.55.17 Whistle Blowing

S3.95 – Workplace Investigation Process

Policy Sign Off:

This policy has been reviewed and approved by:

Deborah Fillippe, VP of Human Resources