



REVISED JUNE 2022
JG-I GROUP OF COMPANIES

JG-I GROUP CODE OF BUSINESS CONDUCT

Engineering, Architectural, Interior Design, Environmental Consulting, Electrical Division

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OUR VISION

To be a leading national contractor striving for excellence by providing our clients with top quality, innovative, and cost-effective results



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OUR MISSION

To design, build and deliver safe, high-quality and cost-effective project management on schedule for our clients while providing quality employment and career growth opportunities for JG-I Employees



1.0 Introduction

At JG-I Group of Companies (referred to as JG-I hereafter) we have a culture in which decisions and behaviours at all levels are fully aligned with JG-I's Core Values and Corporate Principles.

Our leadership team plays an essential role by setting the right example through their own behaviour. They set clear expectations so that all plans and activities are undertaken in a safe, responsible, and compliant manner.

Our team monitors external legal and regulatory developments to ensure we meet requirements and maintain compliance. JG-I employees implement required policies, standards and procedures in day-to-day processes.

JG-I's Code of Business Conduct enables staff to put our Vision and Values into practice. The code defines basic rules, standards, and behaviours for JG-I employees. JG-I's success depends on our reputation for ethical business performance as well as our high level of client and employee commitment. For that reason, it is important that we have this Code to ensure the upkeep of our high standards in every aspect of our business.

1.1 A Message from our Chief Executive Officer

Welcome to the JG-I Group of Companies. (JG-I) team. I am John Gursoy, Chief Executive Officer.

As we work together to achieve JG-I Group's goal – to be recognized by our clients as Canada's leading Group of Companies – everyone on the team has a responsibility to meet the highest standards of ethical conduct.

JG-I Group of Companies has built a reputation for adhering to the most rigorous standards of business conduct. We value this reputation and understand the importance of earning it every day in the interactions we have with our clients, suppliers, the general public and every member of our team.

My background in construction began as a young teenager and the experience and first-hand knowledge I have attained since in this industry has helped me to build a very strong foundation for my business, based on honesty, transparency, diversity, positive culture, ethics, integrity, and a personal touch.

I believe the key to success, aside from providing quality goods and services, is reached by developing a strong management team comprised of loyal people who have a shared vision, mission and culture. For JG-I's team, passion comes first, culture second and experience third.

As Chief Executive Officer, it is my duty and obligation to develop and implement organizational policies, such as ethical compliance, human resources, health and safety, environmental management and sustainability in order to provide solid support our clients, our community, our team members and our stakeholders.

I would like to thank all the past, present and newly joined JG-I team members, clients and stakeholders for their ongoing support.

As the Chief Executive Officer, I work hard for the success of the community by continuously building JG-I's success - protecting and promoting employees, reducing environmental impact and ensuring community investment.

John Gursoy
Chief Executive Officer
JG-I Group of Companies

1.2 Scope: Who Does this Code Apply To?

The Code of Business Conduct (referred to as the Code hereafter) applies to all JG-I employees (Engineer's, Architect's, Interior Designer's, Management, Supervisors, Skilled Tradespersons, Labourers, Administrative Staff) including Sub-Contractors and others completing business on behalf of JG-I.

An annual review of the Code shall be completed by all JG-I employees to ensure comprehension of JG-I rules, standards, and behaviours, including any revisions or amendments to the Code.

1.3 Objectives

The objective of the Code is to ensure JG-I operating practices, goals and company culture are fully comprehended and supported by all employees. Collectively, JG-I commits to:

- Promote Company Vision, Mission and Core Values
- Foster open, cooperative, and dynamic environment in which employees and the Company alike can thrive
- Respect diversity of the JG-I team, communities and all involved stakeholders
- Provide superior, consistent, high-quality services
- Perform work in the safest possible manner in accordance with client safety specifications, federal and provincial regulations
- Provide and maintain a safe work environment which protects the physical, psychological and social well-being of our employees
- Prevent and lessen any negative environmental impact as a result of JG-I operations
- Build and maintain cohesive partnerships between our employees and clients on the foundation of mutual trust, respect and success
- Ensure security and safety of JG-I team members and its stakeholders
- Report activities involving violations of JG-I's Business Code of Conduct or Health and Safety Policies and/or Procedures

1.4 Reporting a Misconduct or Violation of the Code

JG-I holds its standard of ethics in the highest regard and encourages all employees to immediately report any potential or actual misconduct or violations to the Code. This includes, but is not limited to, company policy violations, fraud, malpractice or any other illegal or unethical activity or behaviour by an employee of JG-I or by any individual or business associated with JG-I.

Any and all submissions made by a JG-I employee regarding any potential or actual misconduct or violation will be kept under strict confidentiality and anonymity, unless specifically permitted to be disclosed by the employee or unless required by law. All submissions will be disclosed on a need to know basis to properly investigate claims.

Any JG-I employee report of unethical behaviour in good faith, will be protected from retaliation including threats, discharge or other penalties regarding the reporting or inquiring about apparent unethical behaviour(s).

1.5 Responsibilities of Managers and Executives

At JG-I, all employees are expected to perform their duties with highest level of respect, integrity and with honesty in all aspects of the job. However, Managers and Executives are expected to have an enhanced role by setting an example by complying with the Code and all company policies. The responsibilities include

- Creating an environment that encourages open communication, professional development, and health and safety, labour and ethics principles in all business decisions and actions
- Reporting violations of the Code and company policies
- Taking prompt and decisive disciplinary action for established violations

1.6 Breach of the Code and Discipline

A breach of the Code or any JG-I Policy and Procedures by any JG-I employee, may lead to administrative or disciplinary measures. This may include measures up to (but not limited to) termination of employment.

Penalties for Violations

Disciplinary action, up to and including dismissal, will be taken should an employee, manager or executive participate in the following activities:

- Violation of JG-I's Code of Conduct or any JG-I Policy, disregard the proper procedure set out in these policies.
- Purposely and/or deliberately fail to promptly report a violation or withhold relevant information regarding violation of JG-I's Code of Conduct or Policies.
- Fail to cooperate in any way in an investigation of a known or suspected violation.

Take action against a JG-I employee who reports, in good faith, a violation or breach of the Code of Conduct or JG-I Policy.

2.0 Values and Expected Behaviours

It is expected that all JG-I employees adhere to the Code and behave in a manner promoting positive economic and cultural growth of JG-I Group. In order to achieve our goals JG-I has developed a corporate Vision, Mission and set of Core Values which applies to all of the Company's operating practices.

2.1 Our Vision

To be a leading national contractor striving for excellence by providing our clients with top quality, innovative, and cost-effective results.

2.2 Our Mission

To design, build and deliver safe, high-quality and cost-effective construction projects on schedule for our clients while providing quality employment and career growth opportunities for JG-I Group Employees.

2.3 Our Core Values

JG-I's Core Values are at the foundation of everything we do. Every JG-I employee knows that incorporating these Core Values in our daily work and making them an integral part of our culture is key to our success. We believe that when we commit to work with these values, we achieve superior work in our industry.

Excellence

Being the best, striving to be better, with an eye to delivering quality goods and services

Attitude

Continuously striving for improvement

Respect

For our communities, cultures, workplaces and competitors



Teamwork

Creating a cohesive partnership between our employees and clients based on mutual trust, respect and success

Loyalty

Building long-lasting relationships with clients based on JG-I's dedication to superior service and results

Integrity

Conducting business with strong ethics and moral conviction

Partnerships

Our client's projects are our projects - we work together to make their vision become a reality

Accountability

Trust engrained in transparency and honesty

3.0 People and Communities

People are the heart of our business. JG-I understands that the Company's continued success is dependent upon building and maintaining strong relationships with people and communities. This includes JG-I employees, clients, stakeholders, and community members/the public.

3.1 Human Resources

At JG-I, we believe that our success is rooted in our Core Values. JG-I Group of Companies is an equal opportunity employer who values and respects the diversity of our team. Religion, age, gender, national origin, sexual orientation, race, or color does not affect hiring, promotion, development opportunities, pay, or benefits. JG-I Group of Companies provides fair treatment of employees based on merit. The company complies with all applicable federal, provincial, and municipal labour laws.

JG-I Group of Companies strives to provide an employee-friendly environment in which goal-oriented individuals thrive as they achieve evermore demanding challenges. Employee Policies and Procedures are communicated through the Employee Handbook.

JG-I values the talents and abilities of our employees and seeks to foster an open, cooperative, and dynamic environment in which employees and the Company alike can thrive. The Company provides an open-door policy in which employees are encouraged to take problems to the next level of management if they are unable to resolve a situation with their direct/reporting manager.

3.2 Commitment to Community

JG-I fosters this development and growth of relationships with people and communities in various ways:

1. We contribute to the growth of communities in which we conduct our projects, ensuring the work is completed safely and on time without costly delays.
2. We provide employment to many individuals, subcontractors and vendors in the Edmonton area and throughout Canada, contributing to the local socio-economic development.
3. We assess and control/mitigate any negative impacts which may arise as a result of any JG-I work activities
4. We give back to the community through various charitable initiatives.

We believe that success is made from a number of factors: positive thinking, passion, persistence, experiencing adversity, and nurturing strong interpersonal relationships with people and communities.

4. COMMITMENT TO QUALITY

JG-I, in all of its operations, strives to provide superior, consistent, high-quality services. In order to maintain this, JG-I follows a Quality Management System complete with pre-project planning and preparation, active project management and quality control and assurance during and post-project.

JG-I's Quality Management System places a strong emphasis on preventing issues/problems rather than detection of problems once they occur, as we believe being proactive is the key to maintaining quality.

4.1 Quality Management System



PRE-PROJECT PLANNING AND PREPARATION

Prior to the commencement of any project, the JG-I team sets out the objectives and goals to be achieved, the strategies, processes, procedures and the plans to be followed, all with the aim to fulfill contract requirements safely, efficiently and to the highest of industry standards.

ACTIVE PROJECT MANAGEMENT



During all JG-I projects, our Management team is directly involved to ensure ongoing compliance with rules and regulations, processes and procedures, and that work is being completed as per all plans and strategies outlined in the pre-project planning and preparation stage. Active project management allows JG-I to monitor all projects closely and ensure the quality of work performed by our team and sub-trades meets and exceeds our quality standards.



QUALITY CONTROL AND ASSURANCE

Client loyalty is earned through consistent delivery of on-schedule, high-quality workmanship. Our JG-I team ensures this standard on all projects and does so by completing a variety of quality control and assurance techniques. When working with JG-I, clients and stakeholders can rest assured that the project will be completed efficiently and fully to the highest industry standards.



INTEGRATED BUSINESS MANAGEMENT TOOLS

JG-I operates software tools to run its business in a more efficient and effective manner, integrating program software for client analysis, budgeting, and scheduling. Our fully integrated and automated software system will provide your business with the tools you need to accomplish a successful project from start to finish. Our integrated program system utilizes management billing for cost plus or management fee work, project management to track documentation related tasks for each job, purchase order & procurement, project & resource scheduler, work order, dispatch scheduler, etc. Our goal is to be the best, which is why we focus on partnering with clients that are the best fit for their needs.

4.2 Quality Management Policies

JG-I is currently developing a strong Quality Management Policy.

This policy sets out the criteria for a management system based on a number of quality management principles including a strong customer and environmental focus, the motivation and involvement of top management, the process approach and continual improvement.

5. HEALTH AND SAFETY COMMITMENT

JG-I is committed to providing a safe work environment which protects the physical, psychological and social well-being of our employees and protecting the environment through compliance with applicable Federal, Provincial and local environmental laws and regulations. All JG-I employees and sub-contractors MUST abide by JG-I's Health, Safety and Environmental Program, including all policies and procedures as written in the HSE Manual.

5.1 Health and Safety Policy

Our policy is to perform work in the safest possible manner in accordance with client safety specifications, federal regulations and provincial regulations.

Our commitment is to take every reasonable precaution to provide and maintain a safe work environment which protects the physical, psychological and social well-being of our employees.

Our goal is to eliminate or minimize hazards which may cause injury or illness.

Our expectation is that all projects will be on time, within budget and completed safely.

Responsibility/Obligations: JG-I (as the employer) and all employees (as workers) share responsibility to work together in accordance with Section 2 of the Alberta Occupational Health and Safety Act, Regulations and Code, which states:

(1) Every employer shall ensure, as far as it is reasonably practicable for the employer to do so, the health and safety of the workers.

(2) Every worker shall, while engaged in an occupation, take reasonable care to protect the health and safety of the worker and of other workers present while the worker is working, and co-operate with the worker's employer for the purposes of protecting the health and safety of all other workers.

5.2 Health and Safety Leadership

As stated in the JG-I Company Health and Safety Policy, JG-I and all JG-I workers share responsibility to ensure work is completed in a way that protects the health and safety of all workers. Our management team at JG-I provides overall leadership for the Health, Safety and Environmental (HSE) Program.

- Senior Management visibly and professionally demonstrates commitment to HSE leadership roles.
- Middle Management/Supervisors actively promotes the HSE Program and evaluates workers to ensure capability can be achieved in attaining JG-I's safety objectives.

Workers and Contractors learn and abide by all safety standards as per our HSE Program, Alberta Occupational Health and Safety Act, Code and Regulation, and Client's requirements.

5.3 "Zero Accident" Target

JG-I strives for a "Zero Accident" target in all our operations because ALL ACCIDENTS ARE PREVENTABLE. To achieve this target, we must have an unshakable support system, rooted in Management, and branching out to all JG-I workers, subtrades and stakeholders.

To achieve our target of "Zero Accident", JG-I pledges to:

- Commitment and demonstration of health and safety practices and policies by JG-I Management
- Provide ongoing health and safety training
- Encourage transparency and open dialogue for all health and safety matters
- Prompt investigation and mitigation of risk

5.4 HSE Training

JG-I provides, to all JG-I workers, safety and related training that is necessary to minimize losses of human and physical resources of the company.

This training includes, but not be limited to:

- HSE orientation for all employees
- Hazard identification and control processes
- HSE and leadership training for supervisors and management
- Task and trade-specific training and certification
- Specialized safety and related training
- Refresher and update training

5.5 Communication

Transparency and open communication are the foundational building blocks which allow JG-I to maintain our Core Values. Input from employees is encouraged during all formal meetings and is an integral component of our positive Health and Safety Culture.

5.6 Sub-Contractor Management

JG-I does not separate our subcontractors from our own employees. We apply the same set of Health and Safety standards that we hold ourselves accountable to and ensure their understanding and compliance of JG-I Health and Safety Policies and Procedures prior to any arrangements made or work conducted. Additionally, JG-I Subcontractors are security cleared and monitored for quality assurance.

5.7 Risk Management

It is the policy of JG-I that for every work task to be completed, the risk (probability + severity) is assessed/analyzed so that proper controls can be put into place to minimize and lower the risk of injury/illness. JG-I utilizes a combination of formal hazard assessment techniques and site-specific hazard assessment techniques. Risk assessment is a vital component in ensuring on-site safety, helping to drive JG-I toward our ZERO ACCIDENT target.

Formal Hazard Assessments - JG-I field staff and all subcontractors are required to participate in Formal Hazard Assessments prior to start of a new job and as job conditions or scope of work is altered or new work tasks are added.

- Pre-Job Hazard Assessment and Safety Meeting
- Job Hazard Analysis for all JG-I Tasks

Site-Specific Hazard Assessment Methods - JG-I field staff and all subcontractors are required to complete Site-Specific Hazard Assessments prior to start of a new job and as job conditions or scope of work is altered, while on-site.

- Daily Tailgate Meetings
- Field Level Hazard Assessments (FLHA)

5.8 Health and Safety Performance

JG-I holds a COR (Certificate of Recognition) which is a nationally standardized occupational health and safety program accreditation for industry employers aimed at reducing the human and financial costs associated with workplace accidents and injuries.

JG-I's HSE Department conducts an annual COR safety audit, ensures ongoing legislative compliance and provides support for all JG-I workers and sub-trades.

In addition to formal COR auditing, the efficacy of our Health and Safety Program is measured on an annual basis, comparing our Recordable Injury Rate (RIR) from year to year.

Through these audits and comparisons, JG-I is able to address areas where improvement is recommended and plan for completion of corrective actions.

6. ENVIRONMENTAL MANAGEMENT

JG-I Group of Companies is committed to protecting human health and the environment through compliance with applicable Federal, Provincial and local environmental laws and regulations. JG-I will strive to reduce the environmental impact associated with our operations.

We will achieve this commitment through the application of the following environmental principles:

1. JG-I will comply with all applicable environmental laws and regulations.
2. JG-I will not create unacceptable new risks to the environment and will strive to minimize risks from existing environmental conditions.
3. JG-I will strive to minimize the quantity and degree of hazardous waste resulting from its operation.
4. JG-I will strive to become a leader in respect to environmental protection and enhancement.
5. This Environmental Policy is applicable to all operations.

6.1 Environmental Protection

It is imperative that JG-I conduct all operations in compliance with Federal and Provincial Environmental Law, including the Canadian Environmental Protection Act and the Alberta Environmental Protection and Enhancement Act.

6.2 Prevention of Environmental Impacts

Hazards to the Environment caused by construction activities must be controlled in the same manner as any other job site hazard.

JG-I Environmental Impact Controls which may be considered in project planning are as follows:

1. Maintain company vehicles and equipment as per Manufacturer's Specification for better efficiency.
2. Idle vehicles and equipment for 15 minutes or less in cold weather conditions only or as per manufacturer specifications. Warm weather idling is not necessary and is to be avoided.
3. Purchase environmentally friendly products when practicable (e.g. latex instead of oil)
4. Site recycle programs (e.g. garbage separation of metal, wood, concrete)
5. Calculate and order materials in reasonable quantities to eliminate waste; consider sharing extra resources with other projects.
6. Shut down or limit energy use during non-working hours.
7. Conservation of water where possible (e.g. recycling water from hydro tests or sweeping instead of hose washing.)

6.3 Waste Management

JG-I has created and implemented Safe Work Practices and Safe Job Procedures directly related to the handling, sorting and disposal of waste. These Waste Management SWJP and SJP are to be abided by and followed on all worksites by all workers and sub-trades involved.

6.4 Site-Specific Environmental Impact Assessment

Site-specific Environmental Impact Assessment may need to be developed for eco-sensitive areas or in accordance with Federal and Provincial Government Standards and Community Safety.

6.5 Environmental Performance

Our Environmental Management Policy is a standard that sets out the requirements for an environmental management system. It helps JG-I improve its environmental performance through more efficient use of resources and reduction of waste, gaining a competitive advantage and the trust of stakeholders. JG-I is involved in an ongoing process of developing and implementing its Environmental Management System.

7. SECURITY, ETHICS AND COMPLIANCE

At JG-I Group of Companies (JG-I), we recognize and respect the importance of conducting business ethically and in compliance with all applicable federal, provincial and local laws and regulations. JG-I also places precedence in protecting the privacy, security and safety of JG-I team members and its stakeholders.

7.1 Corporate Principles

In reflection of our Core Values, JG-I adheres to a number of Corporate Principles. These Corporate Principles, as listed below, shall serve as JG-I's business practice philosophies:

While conducting business on behalf of JG-I, all employees and sub-contractors must NOT:

- Speak unprofessionally about competitors.
- Speak unprofessionally of clients and stakeholders.
- Argue reasonable requests from clients or management.
- Conduct business based on unwarranted assumption.
- Conduct oneself as boastful, ambivalent or arrogant.
- Obtain work by under-bidding that is unsportsmanlike.
- Conduct or accept any business endeavors without management approval.

While conducting business on behalf of JG-I, all employees and sub-contractors must:

- Create and submit bids based on transparency, honesty and ethics.
- Practice open communication in order to promote successful teamwork.

Agree with our Company Culture, including JG-I's business practices and future goals.

7.2 Security

At JG-I, we recognize and respect the importance of security. JG-I builds and maintains cohesive partnerships between our employees and clients on the foundation of mutual trust, respect and success. Ensuring the security and safety of JG-I team members and its stakeholders, both internally and externally, is of utmost importance to JG-I and the Company's Core Values.

IT Management System

At JG-I Group of Companies (JG-I), we place emphasis on the security and safety of our confidential documents and IT programs/software. JG-I has devised an IT Management System to avoid any safety breaches and leaking of classified/confidential information.

Internal Safeguarding

Only few selected, security cleared, JG-I personnel are granted access to confidential client and personal information within JG-I and its operations. This includes the storage and distribution of client keys and codes for building access. JG-I workers, sub-contractors, clients and stakeholders alike can rest assured that their personal information is safe within our internal systems and will be used only for the purposes for which it was collected.

Personnel Security Screening

Providing the right people for the right job is imperative to the success of the Company. To ensure on-site safety and security, and to protect the Company's quality assurance, all JG-I employees and Sub-contractors are subject to mandatory personnel security screening as a prerequisite to providing any services on JG-I worksites/projects. This security clearance allows all workers unescorted access to work sites.

7.3 IT Management

At JG-I, we place emphasis on the security and safety of our confidential documents and IT programs/software. JG-I has devised an IT Management System to avoid any safety breaches and leaking of classified/confidential information.

Internet Security

JG-I engages in a number of security activities to help ensure the safety and privacy of your personal information. This includes adopting measures to help secure our computers against hacker attacks and virus activities by a number of different means. We monitor our website, servers, email, and data 24 hours a day to help us immediately identify and rectify any problems, by use of hard drive back-up and firewall protection. Note that all emails and attachments sent to

the organization may be scanned for viruses by a third-party service provider. This is to ensure stakeholders, partners and clients are provided peace of mind and continuous security monitoring.

Data Security

JG-I runs current anti-virus software and anti-spyware software on our computers. This helps ensure our computers are free of malicious programs such as viruses, worms and spyware (snooping software that collects and shares confidential information with a third party without your consent).

Website Security

Protecting your privacy and your personal information is an important aspect of the way at JG-I Group of Companies (JG-I) creates, organizes and implements our activities on-line and off-line. Our privacy policy supports and endorses the national privacy regime. We will only collect personal information from you with your prior knowledge and consent. You can access our website home page and browse our site without disclosing personal information.

JG-I will only use personal information provided by you for the purposes for which it was collected. We will not disclose your personal information to any unauthorized third party. We ensure that your personal information will not be disclosed to any institutions and authorities except if required by law or other regulation. JG-I has implemented technology and security policies, rules and measures to protect the personal information maintained under control from unauthorized access, improper use, alteration, unlawful or accidental loss or destruction. JG-I group will remove personal information from our system where it is no longer required (except where archiving is necessary).

Client Security

Protecting our client's privacy and their confidential information is an important aspect of the way JG-I creates, organizes and implements its activities on-line and off-line. Our privacy policy supports and endorses the Canadian Privacy Act and Personal Information Protection and Electronic Documents Act (PIPEDA). We will only collect confidential, private and/or personal information from our clients with their prior knowledge and consent.

The information displayed on our website and used in our training materials is of a commercial and professional nature only and has either been obtained from public sources or from our clients directly. We will only use confidential, private and/or personal information provided by our clients for the purposes for which it was collected. We will not use the information provided other than for the purposes outlined above and for other business-related communications. We will not disclose confidential and/or personal information to any third party without proper consent.

We have implemented technology and security policies, rules and measures to protect the confidential and/or personal information that we maintain under our control from unauthorized access, improper use, alteration, unlawful or accidental loss or destruction. We will remove confidential and/or personal information from our system where it is no longer required (except where archiving is necessary).

Any inquiry or complaint regarding information held by JG-I Group of Companies (JG-I), or its use, may be made via any of our 'contact us' options.

7.4 Legislative Compliance

All JG-I employees, subcontractors, clients and affiliates shall conduct business in compliance with all applicable federal, provincial and local laws and regulations while conducting business on behalf of JG-I Group of Companies, including the listed below:

- Comply with the Canadian Corruption of Foreign Public Officials Act (CFPOA), which applies to persons and companies and makes it a criminal offence for persons or companies to bribe foreign public officials to obtain or retain a business advantage.
- Comply with the Canadian Competition Act, which is a federal law governing most business conduct in Canada. It contains both criminal and civil provisions aimed at preventing anti-competitive practices in the marketplace.
- Comply with the Canadian Proceeds of Crime (Money Laundering) and Terrorist Financing Act, vow to not willfully or knowingly participate in a money-laundering scheme or avoid tax liability.
- Comply with all applicable federal, provincial and local laws regarding hazardous materials, emissions, waste and wastewater management, and the transportation, storage and disposal of such materials.
- Comply with the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA)
- Act and respond truthfully in any correspondence with government officials and agencies

- Comply with the Criminal Code of Canada (Criminal Code) which includes laws against human trafficking cases including kidnapping, forcible confinement, uttering threats, extortion, assault, sexual assault, prostitution-related offences, and criminal organization offences.
- Obtain and maintain all applicable permits and licenses required to conduct specified work tasks for which they have been employed
- Prohibit any facilitating payments, unless they are pre-approved in writing by a legal representative, allowed under all applicable anti-corruption laws and properly and accurately accounted for in the Company's records

Refuse gifts and services offered as a means of bribery including money or expensive gifts in exchange for services outside of the agreed contract. Note: Acceptance of nominal gifts, such as marketing merchandise and other gifts of minimal value given in no way related to bribery or as a condition of a project may be permitted.

7.5 Avoiding Conflicts of Interest

Conflicts of interest arise when a persons personal or financial interest interferes with their ability to make sound and objective business decisions. JG-I's members and affiliates must be able to avoid any situation that creates the appearance of this kind of bias. A perceived conflict of interest can be just as damaging to JG-I's reputation as an actual conflict.

Conflicts of Interest (Examples):

-Disclosure of confidential information
-Working toward providing services to assist an outside JG-I competitor.
-Using JG-I assets, contacts or other resources to start or support another business or non-profit organization
If any JG-I employee or affiliate is unsure an activity, financial interest or relationship constitutes a conflict of interest, should take action to discuss with a Supervisor if required. Conflicts of interest can often be resolved if they are disclosed promptly. Potential non-disclosure of a known conflict of interest may result in disciplinary action and termination of employment.

7.6 Social Media Conduct

It is expected that while using social media platforms (Facebook, LinkedIn, Twitter, Instagram etc.) the principles and values as outlined in the Code shall be respected. As a general rule, JG-I employees, sub-contractors and affiliates must remember that they will be held responsible for what is said or posted online. No JG-I employee, sub-contractor or affiliate is allowed to post on behalf of JG-I unless authorized by JG-I Management.

Respect for JG-I and our reputation is in the best interest of all JG-I team members and stakeholders. Misleading, disparaging, or untruthful comments will not be tolerated and may be grounds for disciplinary action or termination of employment.

Protecting Confidential Information

Whether you are posting as an authorized JG-I personnel or for personal interest, you are only authorized to disclose information that is publicly available. You have an obligation to always protect JG-I's confidential information. This information includes (but is not limited to) client data, JG-I employee information and other information not released to the general public about business matters. With this obligation you are also responsible for ensuring that you are not posting any comments that would include confidential information concerning any and all business-related matters (including that of any JG-I employee). You must ensure that you are not posting anything that could damage the JG-I reputation in any form. The protection of our reputation is always held at the highest importance.

7.7 Legal Affairs

In order to preserve and protect the welfare of our affiliates and the Company, JG-I operates with a good understanding of business. Business cost and time pressures, competitive realities and operating culture are fundamental to the success of JG-I and its stakeholders. This requires amongst others, the ability to offer good judgment, to find solutions without compromising corporate standards and to communicate transparently with all clients and stakeholders.

7.8 Ethics

In alignment with our core values of Respect and Accountability, JG-I maintains a toll-free Hotline 1-866-702-8528 so employees can report activities that may involve violations of JG-I's Business Code of Conduct or Health and Safety Policies and/or Procedures.

When concerns arise, JG-I encourages employees to consult with their immediate Supervisor, the Project Supervisor or their HSE Department representative. If their concerns are not resolved, they are encouraged to voice their concerns to the Head Office.

Violations of the Code of Conduct that are subject to reporting procedures include:

- Financial reporting and internal control issues
- Health, Safety and Environmental issues, including unsafe working environments
- Workplace disputes and misconduct
- Workplace violence
- Workplace harassment
- Human rights and employee rights issues and/or suspected violations
- Bribery and excessive gifts
- Unfair advantage
- Confidential information leaks
- Managers using employees for their personal profit/business
- Unfair performance evaluations

Note: If you are involved in legal or police matter which has the potential to affect your ability to perform your job fully, you must immediately notify your manager or Head Office.

Note: Sexual and physical assaults are defined by the Criminal Code and will be dealt with according to that legislation. If you have been assaulted or are involved in or witness a medical/safety emergency, you should seek assistance immediately and contact the police by dialing 911.

7.9 Political ActivitiesPolitical Contributions

Political contributions refer to any payment or donation, including (but not limited to) providing services at favourable rates, made on behalf of JG-I Group of Companies to a recipient involved in federal, provincial, territorial or municipal political process, such as a political party, election, or an elected official. JG-I's corporate policy prohibits any and all political contributions on behalf of JG-I Group of Companies, without the prior consent of the CEO.

Lobbying on Behalf of JG-I Group of Companies

As a broad definition, lobbying involves reaching out to a public office holder (such as an MP) in order to further JG-I's objectives. Lobbying public office holders is a legitimate activity; however, the law sets specific boundaries around the activity of lobbying, as well as establishes certain disclosure requirements to ensure all activities around lobbying are made transparent and ethically. The CEO and Executive Managers within JG-I must be consulted before making representations to any public office holder.

7.10 Improper Influence

All JG-I employees are strictly prohibited from manipulating, coercing, misleading or influencing JG-I's internal or external auditors at any time. This is especially important when the employee knows or should know that his/her action(s) could result in rendering JG-I's financial records or statements misleading in any way.

7.11 Trading in Securities

As an employee of JG-I, you may be made aware of undisclosed material information about JG-I or any other company we do business with. Unless you are certain that this information has been made officially accessible to the public, it is illegal for you to do or participate in the following:

- Trade in securities of JG-I or any company in which the information pertains.

- Public disclosure of information (other than in the necessary course of business and on a strict confidential need-to-know basis) to another person.
- Undisclosed material information refers to information that, if disclosed, could affect the market price of a company's securities or is likely to be considered important by investors in determining whether to buy, sell or otherwise trade in such securities.

By law, severe penalties may be imposed against you personally as a result of unlawful trading and tipping.

7.12 Public Disclosure of Material Information

Only authorized JG-I Executives can decide the context and timing of public disclosures regarding JG-I Group of Companies.

Any unauthorized persons are not permitted to communicate any details on behalf of JG-I and hereby not authorized to respond under any circumstances to respond to requests of inquiries made by the media or other unknown representative. Any inquiries of this nature are to be reported immediately to an authorized Executive.

7.13 Confidentiality of Client and Employee Information

JG-I is committed to maintaining the confidentiality and security of our client's information. It is essential that we protect the confidentiality of all non-public information entrusted to us by our clients, except when disclosure is authorized or legally mandated. Even the most mundane of information might be of use to competitors of JG-I or its clients if disclosed. Therefore, clientele and JG-I employee information will be limited only to parties requiring details on a need-to-know basis. In addition, we must comply with the laws and regulations related to privacy that apply to JG-I, including the Personal Information Protection and Electronic Documents Act and restrictions imposed by CRTC.

In the event the client provides explicit consent, all information kept by JG-I is considered confidential and cannot be disclosed or used for any purpose except for the business intended. We may only use client information for the purposes intended for which the information was collected and approved. Recording, release of or disclosure private client information for personal gain or the benefit of another will result in immediate discipline up to, and including termination, and may include civil or criminal prosecution.

Interception of Private Communications

The unlawful interception of a private communication is prohibited under the Criminal Code. The content of a client's transmissions (including by telephone and e-mail) may not be monitored, nor may the content, nature and existence of telephone calls and data transmissions be released to third parties except as explicitly authorized by law.

Employee Privacy

JG-I has always been committed to protecting the personal information of its employees which is collected only for the purposes relevant to managing the employment relationship. The obligations described in the Personal Information Protection and Electronic Documents Act also applies to the collection, use, non-disclosure, and protection of personal employee information.

All personal information is protected by security safeguards appropriate to the sensitivity of the information and may only be used for purposes intended relating to the management of the employment relationship or for other purposes as may be required by law. All employees, management and otherwise, holding personal employee information must handle it in accordance with privacy principles.

7.14 Information Classification and Records Management

The purpose of the Information Classification and Records Management Policy is to ensure JG-I's information is properly classified records are protected, stored and shared in compliance with all legal requirements and business needs. The policy is applicable to all forms of records regardless of who prepared them, whether they are paper, electronic or any other media format.

Employees are responsible for the following:

- Ensuring compliance with business, legal and regulatory requirements regarding record retention

- Improving efficiency in operations, by eliminating unnecessary records
- Ensuring the preservation and accessibility of relevant records regarding business operations of JG-I, in the event of potential or actual litigation or internal/external (including Governmental) investigations.

Confidential information is defined as private and sensitive data pertaining to JG-I's line of business that is protected from public knowledge. Examples of Confidential Information JG-I Group protects from unintended exposure include but are not limited to the following:

- Marketing strategies, competitive pricing, bid and proposal submissions.
- Training materials intended for internal use.
- Passwords and encryption keys.
- Undisclosed financial results.

Employees must also:

- Not send confidential information to personal e-mail accounts or store them on personal devices.
- Ensure confidential information is secured and stored properly when unattended.
- Avoid discussion of confidential information in public places, with family members or anyone outside the JG-I company.
- Report immediately any unauthorized disclosure, transmission, or misuse of confidential information to the appointed Managers or Executives.

Post Employment Obligations

Your obligation to protect JG-I's confidential information continues after the employment relationship ends. Upon termination of employment or contract, all employees must:

- Return all copies of confidential information and documents.
- Keep confidential any information pertaining to project details private as was originally intended.

7.15 Dealing with Clients and Suppliers

By ensuring that our reputation for quality, integrity and service remain intact, we continue to achieve an ongoing competitive advantage. JG-I competes fairly but with vigor, while always complying with our legal and ethical obligations.

Client Relations

Clients and our service to them is at the very core of our business. We succeed by being honest, courteous and always respectful when dealing with our clients and their property.

Our clients expect us to provide the very best quality in all aspects providing transparent when discussing business. To maintain that trust we must maintain the following:

- Provide client services which are qualified and professional, approved and authorized by the client or client's designated representative(s).
- Ensure client communication and information pertaining to the project and work underway is as accurate as professionally deemed possible.
- Do not offer rates or provide discounts unless authorized to do so and are able to fulfill the agreed upon work.

Supplier Relations

- Like many businesses JG-I Group purchases goods and services commercial and industrial suppliers, fostering relationships to maintain and continue development required to achieve successful delivery schedules and installation deadlines. While we share client and supplier relationships, JG-I Group will ensure uncompromising price and quality in our services. Our main goal is to be truthful, respectful and ensure supplier relationships continue in good standing and good faith to the best of our ability.

7.16 Dealing with Competitors

JG-I welcomes fair competition, in fact we encourage it. We are committed to treating all our competitors with the highest level of respect. By doing this, we believe in honouring the proper competitive spirit, which motivates us to continue to perform to the peak of our abilities.

Behaving competitively means that we:

- Never portray a competitor in a negative manner. This includes inaccurate misrepresentation of a competitor to the public or a client.
- Do not state as fact, our understanding of a competitor's price information, as this may be wrong, out of date or incomplete.
- Always use caution and care when speaking publicly about a competitor's business practice, management, financial state or ownership.
- Never behave disrespectfully towards a client who chooses the services of a competitor over JG-I. Instead, we promote the high-quality services we may still be able to provide that customer.

7.17 Safeguarding JG-I Assets

All JG-I employees are accountable for the safeguarding of all JG-I assets from damage, loss, theft, fraud, sabotage, vandalism, unauthorized use or disposal. If any damage has occurred, or improper has resulted this could impact decision making, business strategies and weaken confidence in any JG-I investors. Doing this could also lead to the weakening of the JG-I brand and could seriously damage JG-I's integrity as a whole. This is considered as severe misconduct and could lead to termination of employment. This could also be considered a criminal offence and may lead to criminal charges.

JG-I's Organizational Assets may include (but are not limited to) the following:

- Offices and office space (including the common areas)
- Office equipment, such as printers, scanners, computers, laptops and telephones
- All inventory, including office and warehouse use
- Artwork
- Video equipment meant for the protection of assets and otherwise used
- Tools, materials or any other equipment meant to be used for client purposes or otherwise
- Vehicles, this includes company vehicles
- Any buildings, including the warehouse and other property used and owned by JG-I
- Any and all information, funds, communication networks, information systems and all intellectual property

All access to and use of any JG-I asset must be authorized by the proper authority, controlled and based solely on business need only. JG-I employees should not use these assets for personal use, except where this use has been authorized by management. Each JG-I employee must take reasonable action to ensure proper measures are taken in the prevention of loss due to the willful actions of any person within and outside the JG-I company, which may result in personal injury, property damage, theft, fraud, loss, abuse or any other unauthorized use (be that with physical or intellectual property, including data).

All JG-I employees are expected to safeguard JG-I assets and comply with all JG-I policies, no exceptions. All JG-I policies can be found in the Employee Handbook and are easily accessible. If a JG-I employee has a question or concerns with a JG-I policy, and are encouraged to speak directly with a member of management.

Prevention of Fraud

Fraud is defined as an intentional deception, falsification or misrepresentation made for personal gain, or to damage or create loss for the organization, customers, clients, or individuals. This can include the misuse or misapplication of the company's resources or assets to conduct internal fraud

To successfully prevent fraud within JG-I, we require all employees to keep an ongoing commitment which includes, actively participating in the prevention, detection and reporting of suspected fraud, whether it is committed internally

or externally by any parties, third or otherwise. As a JG-I employee we all agree to not engage, directly or indirectly, with bribery, kickbacks, account falsification, fictitious claims of any kind, time fraud or corrupt business practices.

Fraudulent actions are not only unethical and harmful but are also considered criminal violations of the law in such cases. JG-I has a zero-tolerance policy regarding all confirmed fraud cases and situations. If you or another employee of JG-I are approached with the opportunity to engage in any fraudulent activity, it is your duty to report the incident immediately to a supervisor or management.

Standard Contracts and Agreements

Contracts and Agreements represent an integral part of the direct growth of JG-I. If you are a JG-I employee who has a position in which you develop, handle or sign Contracts and Agreements, you must take all necessary steps to protect the interests of JG-I and its clients by ensuring only JG-I approved contract templates are being used and followed precisely with the input of proper information. It is also your responsibility to ensure that all policies regarding any JG-I Contracts and Agreements are being followed, and if not, you must report this to management directly and immediately. All Contracts and Agreements must be reviewed by an authorized member of management to ensure quality control.

Information Security

Computer and computer networks are an integral part of the JG-I business in many aspects. For this reason, it is extremely important that every effort be made to ensure the protection of JG-I's computer systems and any associated files from any and all threats, such as accidental or deliberate loss of data, equipment, interruption of service, disclosure of any confidential information, theft or corruption. To maintain JG-I security:

- Access to computer systems will only be granted to those who have authorized use of these systems.
- Passwords and access codes will be kept confidential and cannot be shared with anyone including other JG-I employees.
- Employees must comply with all security policies, even when traveling with a mobile device that has access to any confidential files (including e-mails).