

## MAPA GROUP ENVIRONMENTAL AND SOCIAL COMPLIANCE POLICY

### 1. Introduction: Social Compliance and Responsibility

This **Environmental and Social Compliance Policy** (“**Policy**”) describes the continuing process in which **Mapa Construction and Trade Co. Inc.** (“**Company**”) and its subsidiaries (hereinafter referred to collectively as “**Mapa Group**”) endeavours to protect the human rights, health and safety, the labour standards of their employees, the people, the community and the environment in which the Company operates, and the lives and communities in its working environment.

The Company is committed to conducting business in a sustainable and socially responsible manner and is determined to contract with suppliers and subcontractors and business partners who also respect the rights and dignity of their employees, the people and preserve the environment and communities. Our business partners, suppliers and subcontractors must comply with the legal requirements and standards of their industry under applicable laws and regulations of the countries in which they are doing business, as well as internationally declared human rights, and labour standards of the International Labour Organization.

Compliance with this Environmental and Social Compliance Policy is mandatory for all the Company’s business partners, suppliers, subcontractors. The Company reserves the right to immediately terminate its business relationship and cancel all works and orders with any business partner who does not comply with this Policy.

Each supplier, subcontractor and business partner is expected to read and become familiar with the ethical standards described in this Policy and may be required, from time to time, to affirm his/her agreement to adhere to such standards by signing the Acknowledgement and Compliance Certificate that appears at the end of this Policy. For other stakeholders of the Company, similar certificates may be issued and signed, as required.

### 2. ISO Certifications of the Company:

- ✓ The Company is **certified ISO 14001 Environmental Management Systems** and complies with all the requirements of this standard.
- ✓ The Company is **certified ISO 9001 Quality Management System** and complies with all the requirements of this standard.
- ✓ The Company is **certified ISO 37001 Anti-bribery Management Systems** and complies with all the requirements of this standard.
- ✓ The Company is **certified ISO 45001 Occupational Health & Safety** and complies with all the requirements of this standard.
- ✓ The Company is **certified ISO 3100 Risk Management System Certification** and complies with all the requirements of this standard.

### **3. Compliance with Internationally Declared Human Rights and Ethical Labour Standards**

The Company is committed to complying with the international standards of fair and ethical labour practices as reflected by the International Labour Organization (ILO) and the United Nations (UN). The Company expects its suppliers, subcontractors and business partners to abide by these ethical labour standards and human rights. These ethical labour standards include, but are not limited to, treating employees with dignity, allowing employees the right to decent work, the right to legal and fair wages for work performed, providing employees with a safe work environment.

### **4. Health and Safety of the Work Environment**

The Company is committed to treating all its employees with dignity and respect and providing its employees with a safe, healthy, clean work environment including appropriate and adequate facilities and protection from hazardous materials or conditions. The Company expects its partners to maintain the same standards in their factories and sites. The Company and all its partners must comply with all applicable local laws and regulations governing working conditions. If housing is provided by the Company or its partners for employees, all housing must be maintained in a clean, safe fashion. The Company strictly forbids the use of unusual disciplinary practices in the workplace.

### **5. Compliance with Occupational Health & Safety Laws**

The Company will comply with Occupational Health & Safety laws applicable in the country in which it operates and ensure compliance with these laws. The Company will do risk identification, risk assessment, risk elimination and implementation of workplace procedures and controls including safe systems of work. All aspects of the Company's Occupational Health & Safety shall be subject to periodically planned review, but also when changes occur for example in equipment, processes, materials or substances used. Employees and those working with us onsite and offsite will be provided with appropriate guidance, training, resources and equipment to ensure a safe and healthy working environment for all. Adequate steps shall be taken to prevent accidents and injury so far as reasonably possible. Workers must be provided with appropriate safety training and protective equipment.

### **6. Engage in Fair and Ethical Employment Practices**

***Fair Wages and Reasonable Working Hours:*** Employee recruitment and selection processes will be conducted fairly and equitably. The Company and its business partners must fairly compensate their employees by providing fair wages and benefits and reasonable work hours in compliance with local standards and applicable laws of the countries in which the Company and its business partners are doing business. The Company and its partners must compensate their employees for overtime hours at rates legally required. The Company and its partners must not require employees to work more hours than the limits on regular and overtime hours prescribed by applicable law.

***No Child Labour:*** The Company and its business partners will not accept the use of child labour in its operations under any circumstances and will not purchase a product or not procure work and services from any business partner that uses child labour. In determining whether a labourer is a "child," the Company will refer to the local legal minimum age for employment or the age

for completing compulsory education in the country of operation, whichever is greater. In situations involving hazardous working conditions, workers should be at least 18 years of age.

***No Forced or Compulsory Labour:*** The Company will not accept forced or compulsory labour in its operations under any circumstances and will not work with any business partner that utilizes forced or compulsory labour. Every employee must be a voluntary worker. No employee shall be subject to corporal punishment, threats of violence, or other forms of psychological or physical harassment, abuse or coercion.

***Non-discrimination in respect of employment and occupation:*** The Company employs workers based on the ability to perform a job task, not based on personal characteristics, beliefs or any form of discrimination based on race, color, sex, religion, political opinion, and expects its business partners to employ workers on the same basis. The Company and its business partners shall comply with all local anti-discrimination laws and regulations.

***Freedom of Association and the effective recognition of the right to collective bargaining:*** The Company respects the rights of employees to associate, organize and bargain collectively, in a lawful and peaceful manner, without penalty or interference, and expects its partners to respect the same rights.

***Legal Compliance:*** The Company and its partners shall comply with the legal requirements and standards of their industry and the laws of the countries in which the Company and/or its partners are doing business. The Company and its partners shall comply with all applicable export and import requirements. Necessary invoices and required documentation must be provided in compliance with applicable law. All merchandise shall be accurately and clearly marked with its country of origin in compliance with applicable law.

## **7. Environment, Health and Safety**

The Company is committed to operating safely and healthily, with consideration for the impacts of our activities on the environment, people and communities and the performance of the business in meeting customer requirements. The Company has maintained a long-standing commitment to protect the environment and safeguard the health and welfare of its employees, neighbours and the community. The Company recognizes that nearly every aspect of a construction business has a potential to impact the environment, human health or safety and the communities. It is the Company's responsibility to minimize those impacts and develop solutions that protect people and the environment and allow the Company to maintain the product and services quality and value that its clients demand. The Company's approach is to collaborate with its employees, suppliers, clients and communities to identify, assess and minimize the environmental, health and safety impacts resulting from the Company's operations and the operations of the Company's partners.

## **8. Adherence to Environmental and Sustainable Practices**

The Company must adhere to all applicable environmental laws and regulations regarding the protection and preservation of the environment in which it operates. This shall include having processes in place to ensure compliance with environmental regulations relating to the handling, recycling, and disposal of dangerous or hazardous materials. The Company favours suppliers, subcontractors and business partners that share its commitment to sustainable business practices.

## 9. Specific Environmental Topics:

The Company recognizes the importance of the environmental challenges, **Climate Action, Water, Forests / Biodiversity/ Land Use, Air pollution, Waste, and Energy & Resource Use** and commits to the required steps and actions will be taken in all our projects and operations.

- Development of a climate change strategy that identifies the risks and opportunities for the Company and sets targets for GHG emission, and energy reduction.
- Use of renewable energy resources to meet climate goals.
- Use water, energy, and other resources efficiently to minimize consumption
- Use land/forest only required for the project and operation in responsible manner to minimize impact to the habitat.
- Development of biodiversity action plan for the project if required to contribute positively to the conservation of biodiversity.

The Company strives to take necessary actions within its sphere of influence, to minimize the environmental impacts of its operations. The Company will make efforts and implement sustainable strategies aligned with international environmental standards and the United Nations' Sustainable Development Goals (UN SDGs).

## 10. Audit Right and Compliance Monitoring

The Company conducts regular assessments of its facilities and the facilities of its partners to ensure compliance with this Policy. The Company reserves the right to inspect, or to hire a third party to inspect on its behalf, any location or site for compliance with this policy. The Company further reserves the right to cease doing business with any non-compliant supplier or subcontractor without any liability resulting from such termination. Suppliers and subcontractors are expected to comply with all requests for information from the Company or its third party auditor to confirm compliance with any provision contained in this Policy.



**EXHIBIT 1**

**Social Compliance Policy Acknowledgement and Agreement to Comply**

As the supplier/ subcontractor/ business partner/ third party [delete as appropriate], I certify that I have read and understood this Environmental and Social Compliance Policy and agree to abide by the principles set forth herein.

I undertake to report any circumstance or situation which may occur in the future which would have to be disclosed in accordance with this Environmental and Social Compliance Policy.

I further confirm my understanding that any violation of this Environmental and Social Compliance Policy may result in the termination of the business and contractual relation that I have with the Company and may impose legal and criminal sanction against me.

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_