

LES EXCAVATIONS SUPER INC.

Code of Ethics and Business Conduct

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1. Message from the President

Our company has managed over time to gain the confidence and the respect of our business partners due to the professionalism of our employees and the quality of our work. While the high quality of our work is still of outmost importance, how we are doing our work and conducting ourselves is also critical and equally important. Ethics and integrity means more than just complying with the laws and regulations. By doing the right thing every time, no matter what the circumstances, we enforce our deep commitment to the highest ethical standards and business practices in the industry.

The Code of Ethics is a guide to help us navigate in the everyday life and provide structure and support when we encounter a difficult situation. It sets the expectations for the integrity and ethics and holds the fundamental principles that we must follow, given that it is impossible to foresee and address all the circumstances that might arise in the course of our business.

The Code of Ethics stems from our mission, vision and values and therefore it reflects our corporate culture.

2. Mission, Vision and Values

Mission:

To undertake construction, excavation and demolition projects to the most rigorous quality control standards. We also bring the same respect and diligence to all budgets and delivery dates.

Vision:

Through involvement in high-quality projects, help Montreal take its rightful place on the international map as a dynamic and modern metropolis.

Values:

- Commitment: Observe only the highest standards of quality for our projects
- Safety: Ensure the health, safety and security of all persons affected by our operations
- Respect: Respect clients budgets and delivery dates
- Cooperation: Achieve our goals through teamwork and mutual support
- Excellence: Strive for distinction and encourage personal development

3. Work environment

Mutual respect and dignity

Mutual respect and dignity are essential in creating and preserving a work environment that is harmonious and enriching for all employees.

We promote a work environment that:

- Is free of violence and any other form of harassment
- Values diversity and recognize the value of each person
- Respects individual rights, dignity and privacy

Health and Safety

We consider the health and safety of our employees to be a top priority and our goal is to create an injury-free workplace. We consider the applicable legislation to be the minimum standard applicable and we encourage the collaboration between all interested parties in order identify and eliminate all hazardous conditions in the workplace.

Drugs and alcohol

In order to achieve our goals of quality and safety, it is vital that no employee should work under the influence of alcohol, drugs or any other impairing substances, including prescribed medications.

It is strictly prohibited to consume, possess and distribute alcohol, drugs and any other impairing substances. Any employee experiencing problems or having knowledge about an employee having problems is required to inform the management as soon as possible. All matters will be handled with due care and privacy.

4. Business practices

Fair competition

We must never engage in any activities that could be reasonably seen as obstructing the fair market competition. We would promote at all-time a free market competition and denounce any business practices that are conflicting with free market principles. The following activities are prohibited:

- Not submit a bid or submitting an artificial bid with the purpose of losing or increasing the value of the contract
- Divide or allocate customers, market and territories between Super and other competitors
- Fix and control prices on contract terms
- Limit competition with suppliers and customers

Conflict of interest

A conflict of interest could be real or perceived. A conflict of interest exists when a situation affects the judgment, objectivity or independence of a person due to the differing interest between the personal interest and the professional or public interest. A perceived conflict of interest exists when an independent observer could reasonably determine that a conflict of interest exists, even if not materialized. We should show at all-time fairness and professional independence in our dealings with clients, subcontractors, suppliers and any other third party. Any activities or situations that qualify as a real or perceived conflict of interest should be brought immediately to the management's attention, which is responsible for assessing the impact and the appropriate measure to be taken. All matters will be treated with the required confidentiality.

Gifts and benefits

We must not, directly or indirectly, accept, offer or promise the giving of any bribe, kickback, commission and other payment in the forms of money, goods or services that could be seen as able to influence conduct with the intent of obtaining a personal or business advantage.

Hospitality gifts are permitted solely if they are unsolicited, reasonable as value and in full compliance with the law.

Political activities

Legitimate political activities are permitted as long as they are undertaken outside working hours and without any use of company's resources. Employees are free to make personal contributions to political parties, as long as they are strictly individual choices identified as such. Employees can express freely their opinion on political and social issues but they must not in any way give the impression of expressing company's opinion.

5. Quality of projects

We stand firm in our commitment to the highest quality standards applicable to our projects. We work together with our clients in order to ensure that effective and inexpensive solutions to problems are rapidly found and implemented to their full satisfaction and to make sure that the projects are delivered on time and within the allocated budget.

6. Protection and use of company assets

Company's property should be used strictly for company activities. All employees are responsible for protecting our assets against theft, damage, loss, unauthorized and improper use.

Sometimes employees are entrusted with sensitive information and data which commercial or strategic value. All information that has not been divulged publicly should be treated as confidential information and should not be used or disclosed without prior authorization from the company.

7. Application of the code

The Code of Ethics applies to all the employees, including management personnel.

If you or somebody you know is involved into a situation that could fall under the prohibitions stated in the present Code or any public laws or regulations, we ask you to report the situation immediately in order to obtain the proper assistance in the matter.

We encourage you to communicate your opinions and to make recommendations in order to improve our Code of Ethics. If you have any questions relate to the Code please do not hesitate and contact the management, as we encourage open communication and transparency.

An employee who violates the present Code is subject to disciplinary actions in accordance with gravity of the transgression. Every year the employees are requested to read and review the Code and to confirm that it has been done.