

## **MESC CORPORATE GOVERNANCE POLICIES**

### **ENVIRONMENTAL POLICY**

The Modern Environmental Services Company (MESC) is committed to protecting human health and the environment. This commitment is a keystone of all that we do, reflected in the services we provide to customers, the design and operation of the services we provide to customers, the conditions under which our employees work and our interactions with our customers, and the communities where we live and do business.

We will be responsible stewards of the environment and protect the health and well-being of employees, customers and neighbors. The following principles are applicable to Company operations globally –

- Protection – We will conduct all operations in a manner that protects the environment and our customers, employees, and neighbors. We will proactively work to implement procedures and programs to prevent pollution of the environment.
- Compliance – We will comply with all legal requirements and will proactively implement programs and procedures to ensure compliance.
- Conservation – We will practice and promote the conservation of nature and the earth's energy and natural resources.
- Communication – All MESC employees are responsible for helping the Company identify and remedy possible violations.
- Suspicion of violations of law or MESC's Core Values of Ethical Conduct and Practices shall be communicated in accordance with the Company's Ethical Conduct Communication Policy.

We will regularly monitor our operations and services and make recommendations to our Board of Directors on programs to continuously improve the environmental performance of the Company.

Environmental goals and objectives will be established, reviewed and approved during management review. Our Board of Directors and Executive Management will regularly monitor the environmental performance to ensure adherence to the principles of this policy across the Company.

MESC communicates its commitment to sound environmental practices, and those of our customers to every MESC employee through its Code of Conduct for Ethical Practices. Environmental Management is one of the stated core competencies.

## **CODE OF CONDUCT FOR ENVIRONMENTAL PRACTICES**

MESC is committed to conducting business in a manner which respects, preserves, and improves the environment. To do this we –

- Conduct our services in an environmentally responsible manner.
- Use energy wisely and when possible, improve the efficiency of our operations.
- Comply with all applicable environmental laws and regulations in the Countries we do business adhering to Company policies and professional standards of good industry practices, including those environmental policies & regulations established by our customers.
- Use technologies and operating procedures designed to minimize health and safety risks.
- Encourage employees to report any condition that may pose an environmental, health or safety hazard and provide a confidential means for them to do so.

## **HEALTH AND SAFETY POLICY**

At MESC, safety is a core value, a cornerstone of operational excellence. It is a philosophy that is imbedded in the way we work, the decisions we make, and the actions we take. As a small company operating in oftentimes remote locations for customers, we fully recognize the responsibility to hold ourselves to impeccable standards for the protection of our employees, our communities and our customers. Our goal is to attain world-class safety and, more important, to be leader among environmental liner installation companies globally. Our plan of action is called A Goal to Zero. It means zero tolerance for unsafe actions, unsafe decisions, unsafe conditions, unsafe equipment and unsafe attitudes.

- The cornerstone of our Goal is a Safety Certification Training, which provides classroom and on the job site instruction in safety fundamentals for installation supervisors, and our staff. This policy is extended to local helpers and laborers provided by our customers.
- Our Goal seeks to enhance understanding, change behaviors and develop company leaders who can make a difference and train and lead others.
- Our Goal does not seek to find fault or punish people. Our Goal is about being hard on facts and easy on people.

MESC installation supervisors and trainers monitor and measure safety performance on a continuing basis. These measures reflect the reduced frequency and severity of safety incidents, improved employee satisfaction and improved customer satisfaction.

Through the established Health and Safety processes and procedures, the goal of zero accidents and injuries is transformed into measurable results that have a positive impact on hundreds of people.



## **ETHICS AND DIVERSITY**

### **Business Ethics and Diversity at MESC**

MESC is strongly committed to upholding ethical standards and promoting diversity and inclusion. All employees and others performing work on behalf of the Company are expected to adhere to the laws and regulations that apply to their work activities and demonstrate ethical behavior in all their decisions and interactions.

The company is establishing a Business Ethics and Diversity position to oversee the implementation of a comprehensive corporate Ethics and Diversity program. The position will report to the CEO and, periodically, to the Board of Directors.

### **The Objectives of the Business Ethics and Diversity Position are to -**

- Create an environment where employees understand standards of ethical conduct & abide by those standards.
- Develop and sustain a culture where diversity is valued and leveraged, all employees are treated with dignity and respect, are optimal contributors to business objectives and have equal access to opportunity.
- Create an organization with best in class representation of all types of people along all dimensions of diversity.
- Provide a mechanism for employees to confidentially and/or anonymously communicate breaches in ethical or inclusive behavior without fear of retribution or retaliation.
- Supply training and education to reinforce for all employees MESC's standards of, and commitment to, ethical conduct, diversity and inclusion.
- Identify and develop qualified minority groups and women owned suppliers that add value to the supply chain for our customers and MESC.

## **Current Ethics and Diversity Initiatives Include -**

Ensure each and every employee is in possession of a current and relevant **Code of Conduct**, entitled "Focus On Integrity and Inclusion" which is currently being redrafted.

*This code outlines the company's core values of honesty, respect, responsibility, citizenship, environmental stewardship and excellence, emphasizes the need for fair and honest business dealings in all aspects of the company's business, and provides general guidance.*

- Promoting diversity representation of the Board of Directors, Senior Management and Professional employees.
- Comply proactively with all regulations.
- Develop and deliver diversity and inclusion training to all employees with people management responsibilities.
- Communicate regularly MESC's commitment to ethics, diversity, and inclusion.
- Focus on strategic partnerships with customers and community organizations that share our diversity and inclusion commitments.
- Increase our procurement spend with minority groups and woman-owned businesses.

By maintaining a "Focus on Integrity and Inclusion," MESC employees will help to minimize business risks and liabilities, while maintaining high standards of personal and professional conduct. This focus will be a key ingredient in creating a reputation for organizational and operational excellence.

Practicing inclusive management creates a high performing work environment where all MESC employees and strategic partners are treated with dignity and respect, are optimal contributors to business objectives and have equal access to opportunity.

*Our Bottom Line - Treat people with dignity and respect - they perform better and stay longer.*

## **CORPORATE SECURITY**

### **Corporate Security at MESC**

At MESC we are committed to the highest level of integrity while we build and nurture a culture of trust. Our security efforts are focused on three areas, which are the essence of Corporate Security:

- Safeguard our people, our property, our information and our assets.
- Respect and safeguard our customers' corporate policies and security.
- Partner with our people, our customers and our vendors.
- Preserve our reputation and protect shareholder value by supporting the highest standards of ethical conduct.

### Objectives:

- Ensure safe and secure work environments for our employees.
- Ensure customer employees and day laborers are safe and have a secure work environment at installations sites.
- Protect Company facilities, physical and intellectual property through a process of managing and mitigating security risks.
- Participate in and support the Company Compliance and Internal Audit program including integrated support of all related mandates.
- Develop and maintain security-related policies, procedures, standards and guidelines to assist Company decision makers in improving protections and reducing potential security threats.
- Partner with our customers to ensure compliance with regulatory requirements and adequate protection for MESC's intellectual property and information assets.
- Partner with our customers' Health and Safety and Compliance units to provide cost effective solutions for access control, monitoring, protection and surveillance of locations and facilities.
- Provide an effective process for reporting security incidents and violations and for conducting timely investigation of complaints.
- Establish and maintain Emergency Response and Emergency Command Center plans and operation functions.
- Maintain strong liaison with relevant law enforcement, regulatory agencies and professional organizations for assistance, timely information and ongoing business improvement strategies in the security field.
- Provide support to local community organizations and outreach programs

### Initiatives:

- Implement and maintain effective, Company-wide pre-and post-employment background screening, Motor Vehicle records and when appropriate drug screening programs deemed for our workforce.
- Conduct and manage a site security survey and assessment program to provide security recommendations and advice to installation site managers.
- Establish a formal, ongoing Security Awareness Program.
- Establish and maintain an internal investigation capability to respond to security incidents and reported violations of law, regulatory compliance, policy, ethics, and other directives.
- Develop and maintain formal Crisis Management and Emergency Response plans and support Business Continuity Planning and implementation.
- Provide and manage Guard and Protective services, as and when required.
- Provide on-going training and certification to MESC installers and site supervisors.
- Providing a safe and secure work environment for employees, and for our customers, is more than just a concept and it does not happen by itself. It requires a responsible, unwavering effort and a complete commitment to act with integrity, to support and fairly enforce our policies and to maintain our employees and day laborers in the communities we work as good citizens.

## GENERAL Health and Safety Procedures

- The following outlines the mandatory minimum standards for Personal Protective Equipment (PPE) and High Hazard Work, the PPE consist off the following:
- **Footwear:** All workers on the project site shall wear Closed-toe durable shoes or boots. No sandals or sports shoes will be allowed. At no time will workers be allowed on the project site with bare feet. Safety footwear (steel-toe or other protection) should be worn by workers using steel rollers, tampers, and jackhammers or carrying heavy objects (metal, concrete, and stone)
- **Head Protection:** All construction workers shall wear hard hats when they are in overhead hazard areas including material hoisting/ lifting operations, areas below scaffolds and other elevated work, in excavations, and low ceiling areas that have sharp or hazardous projections. If they are not available, then workers must be kept away from these and other overhead hazard areas.
- **Respirators:** Workers exposed to toxic chemicals, vapors, gases and dusts must wear proper respiratory protection. Workers will be trained in the uses of the respirator and how to properly wear it. The minimum acceptable respirator is a negative pressure filter or cartridge half-face respirator that is correctly equipped for the hazard. MESC shall consult and follow the standard guidance for length of allowable exposure to the contaminant and workers shall not exceed the recommended time for exposure.
- **Dust Masks:** will be worn when the work is producing visible dust.
- **Eye Protection:** Workers shall wear protective glasses, goggles, or visors when exposed to eye hazards. These hazards include concrete dust, stone and concrete chips from hammering, sandblasting, and power tool cutting or milling. Workers performing welding and cutting with torches or arc-welding equipment shall wear the proper shaded lenses in face shields and/ or goggles.
- **Hearing Protection:** Protective ear plugs shall be worn when workers are exposed to potentially damaging noise including jack hammers, flight line operations, power saws and grinders, and combustion engines without mufflers.
- **Gloves:** All workers shall have protective gloves appropriate to the task.

- **Clothing:** Workers shall wear clothing that protects their skin from damage – shirts and long pants at a minimum. Workers exposed to welding operations, chemicals, abrasive blasting, wet concrete, asbestos, and other hazardous contaminants will wear appropriate clothing for the hazard. Workers using power tools or operating equipment shall not wear very loose or flowing clothing that may get caught in the equipment.

#### **WORK METHODS FOR HIGH HAZARD WORK**

The following outlines the mandatory minimum standards for personal protective equipment.

The following types of work and hazards are recognized as the leading cause of serious injuries and deaths in construction work.

Each type of work has specific personal protective equipment and safety equipment that is required to do the work and also specific procedures that must be followed every time the work is done.

These interim measures are the minimum acceptable precautions. For each project, an Activity Hazard Analysis (AHA) shall be completed based on the Construction and Design Management (CDM) guidelines.

Workers shall be trained on the following safety precautions, the nature of the hazards involved, and any additional work methods used prior to performing each type of work.

#### **EXCAVATIONS**

- a) The Site Safety and Health Officer (SSHO) will be contacted for inspection of the work prior to digging. The SSHO will assist in any safety equipment or techniques that are required to avoid injury. They will also provide a safety check on the location to assure there are no underground hazards at the site.
- b) All excavations or unsafe areas will be marked with barricades or warning tape. These warnings must be maintained and visible until the area is restored to a safe condition.
- c) When workers will enter trenches, the walls shall be sloped according to the type of soil or shoring, trench boxes, or other structures will be used to protect workers from collapsing walls.
- d) Soil removed from trenches will not be placed at the edge of the trench. It must be placed back at least 1 meter from the edge.
- e) Vehicles and construction equipment must not be parked closer than 2 meters from the edge of an excavation.
- f) Excavation walls shall be inspected regularly during each day to check for cracks, bulges, large stones, sandy areas, and failure of the wall. If these conditions are found, nobody may enter the excavation and the damaged area must be dug out or braced.

- g) All shoring shall be designed and sealed by a Registered Professional Engineer
- h) All dewatering systems shall be designed and sealed by a Registered Professional Engineer.
- i) Prior to any excavation or dewatering a building stability survey shall be initiated. Additional survey of buildings in the area of excavations or dewatering shall continue throughout the work and following completion of the work.

#### **FALL HAZARDS/WORKING AT HEIGHTS**

- a) When working above 2 meters from the ground or another level, all workers shall be protected from falling. The SSHO will inspect prior to beginning work to be sure the work methods are safe. Inspection will include work on ladders, scaffolds, and other elevated work areas.
- b) Protection systems shall be sturdy railings, walls, or other structures
- c) If there are no structures, handrails, etc. to protect workers a Safety harnesses shall be used along with lanyards.
- d) Safety harnesses are the only acceptable personal fall protection equipment allowed on the project. The lanyard shall be manufactured rope or nylon strong enough to withstand the shock of stopping the worker's weight and they shall be as short as possible, to limit the shock force.
- e) Lanyards shall never allow a worker to fall more than 2 meters. Lanyards without shock absorber devices will be no longer than 1 meter.

#### **ELECTRICAL WORK**

- a) All circuits, wires, and electrical devices shall be checked by testing equipment for safety to workers.
- b) Controls, switches, and other means for energizing the circuit or equipment shall be tagged "do not operate"
- c) Workers shall not work closer to energized systems than the distances listed in the CLIENT manual
- d) Temporary electrical systems shall be grounded and tested for good ground resistance before use.
- (e) Power tools shall be protected from water and damage, and their cords must be insulated. Cords must be factory installed or equivalent replacements, including safety grip plug and cord boot.
- f) All underground High voltage cables must be in accordance with the latest edition of standards & Specifications.
- g) Extension cords will be in safe, good working order.

#### **MOBILE CONSTRUCTION EQUIPMENT**

- a) If equipment, particularly cranes, are damaged the repairs shall be done by a competent repairperson and verified by the SSHO prior to being brought back into service.
- b) Nobody may ride outside the cab of construction equipment. Specifically, no riders May ever be in loader buckets, bulldozer blades, on forklift forks, or suspended by a crane.



- c) Construction equipment shall be equipped with audible back up alarms or shall use a spotter standing away from the equipment. The spotter must be visible to the operator at all times and positioned to see the area behind the equipment.
- d) Construction equipment must work a safe distance from electrical systems, based on the voltage.
- e) Cranes must be used according to the manufacturers rated load charts and stability recommendations. If no manufacturer data is available, a qualified engineer shall develop a load chart.
- f) Workers shall stay outside of the radius of the crane boom during lifting operations.
- g) Lifting ropes shall be inspected daily for breaks and failure of hardware and fittings.
- h) Nobody shall ever ride the hook or load of a crane.
- i) Crane hooks shall be fitted with safety latches.

### **MACHINERY**

- a) Rotating shafts, wheels, blades, and other hazardous parts shall have guards to prevent workers from being injured.
- b) Fuel-powered machinery must not be operated indoors or near enclosed areas without using powered ventilation to prevent toxic CO build-up.
- c) Metal housings of electrically powered equipment must be grounded.

### **CONFINED SPACES**

- a) The SSHO will pre-approve any work in a confined space, such as in a tank, sewer, manhole, or any other enclosed area. The SSHO will inspect the work and assist with any safety equipment or techniques that are required.
- b) All permit-required confined spaces (PRCS) on a project shall have signs prohibiting entry.
- c) Entrants, supervisors, and attendants for PRCS shall be properly trained.
- d) When available, oxygen/flammable/toxic gas meters shall be used for all PRCS. This equipment must be used to evaluate the air in all spaces known or suspected to have contained flammable or toxic chemicals or contain sewage, rotting vegetation or other organic matter.
- e) For spaces not meeting the above criteria, mechanical ventilation fans shall be used to clear the air in the space when meters are not available. Based on the airflow of the fan, it shall exhaust the total volume of the space a minimum of seven times prior to entry.
- f) All entrants shall wear a harness, body belt, or other device attached to a rope sufficient to retrieve the worker in an emergency.
- g) Permits should be used during PRCS entry. If not possible, then some visible means, such as flags or tags outside the entrance, shall be used so supervisors can see when workers are in the space.



## **GAS CYLINDERS**

- a) Pressurized gas cylinders, such as Oxygen and Acetylene tanks will be stored in a holding stand/ cart and secured to prevent them from falling over.
- b) Cylinders will not be placed free on the ground or standing free. If the bottle is not in use the regulator will be removed.

## **NOTIFICATIONS AND INFORMATION**

Emergency information shall be posted at convenient, easy to access and readily available locations. The information shall be concise and clear in form. The information shall also be written in clear font on white background

- The required information shall be specifically agreed on site, and shall, as a minimum, contain the following;
- Police, Fire and Ambulance telephone numbers
- Fire exit and emergency congregation points
- Clear map of nearest hospital

In addition to Health and Safety requirements, ICCB operates the following policies regarding Child Labor, Stop-Work Authority and Site Security (these apply to direct workforce and procedures and to sub-contractor workforce and procedures).

### **CHILD LABOR:**

Minors under the age of 18 may not perform any of the above hazardous work. Additionally, these minors may not perform the following activities: operating dangerous power tools (circular saws, jack hammers, lathes, etc), driving vehicles, be exterior assistants to vehicle operators or operating mobile construction equipment, explosives work, work at heights over 2 meters without standard railings, electrical work, entering excavations, and work with toxic substances

### **STOP-WORK-AUTHORITY:**

Client and/or their authorized agent possess stop-work authority. This authority applies to all work to be performed at its project sites. All Contractor and lower-tier contractor personnel assigned to Client sites are authorized to stop work if there is an identified unacceptable unsafe condition capable of causing death or serious physical injury. If a Contractor fails to resolve unsafe conditions, or if at any time the Contractor's acts, or failures to act, cause substantial harm or imminent danger to the environment or health and safety of employees or the public, Client may issue an order stopping work in whole or in part until the situation is resolved. Any stop work order issued by Client (or issued by a Contractor to one of its lower tier contractors) shall be without prejudice to any other legal or contractual rights of the client. If the client issues a stop work order; the client is the only authority capable of issuing an order for the resumption of work. The Contractor shall



not be entitled to an extension of time or additional fee or damages by reason of, or in connection with, any work stoppage ordered in accordance with this authority. In most cases, a “Stop-Work Order” affects only those areas immediately involved in the hazardous situation. the client may issue a Stop-Work Order for a portion of the work area(s) or an entire work area when, in its opinion, the work area or work practices are not managed or maintained according to Contractor’s ES&H submittals. The Stop Work Order will remain in effect until the responsible contractor resolves the problem(s) and brings the work area(s) to satisfactory conformance with established ES&H requirements. Work shall not resume until appropriate corrective actions have been completed, ensuring that the condition has been corrected.

**SITE SECURITY:**

Contractor and lower-tier contractors are wholly responsible for the security of their storage compound, lay-down areas, all plant materials, equipment, and tools related to the project, at all times. If security measures are found to be inadequate, Client may require additional security measures at no additional cost. Client will retain the right to refuse access to the site or request that a person or vehicle be removed from the site if found violating any of the project/program safety, security conduct rules.

**Hazardous Materials:**

If Site Safety and Health Officer (SSHO) encounter hazardous materials, during the construction period of this contract, he shall immediately stop all work activities in the area where the hazardous material is discovered. Shall then notify the contracting officer representative; identify the area of danger; and not proceed with work in that area until given approval from the contracting officer representative to continue work activities and the contractor shall secure the area from daily traffic until it is safe to resume normal activities

**Weekly Safety Meeting:**

The Site Safety and Health Officer (SSHO) shall held weekly safety meeting with all the site staff and it should be noted in the Q.C daily report.

**Health & Safety personnel responsibilities:**

The H&S manager is responsible for the performance of the safety personnel employed, providing H&S training when required, following up on H&S personnel to ensure that they are stressing the implementation of all safety aspects in addition to routine and unannounced site visits, and hiring of H&S site officers.