

| Policy: | Human Rights Policy |
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| Version: | 1.0 |
| Policy Owner: | People & Culture |
| Date Approved: | May 9, 2023 |
| Date Issued: | May 9, 2023 |

Human Rights Policy

This Human Rights Policy (the "Policy") supplements the standards of conduct expected of Bird Construction ("Bird" or the "Company"), including all employees, officers, directors, direct service providers and agents of the Company ("Employees") pursuant to the Company's Code of Ethics, Respectful Workplace Policy, Indigenous Engagement Policy, Anti-Bribery and Anti-Corruption Policy, Competition Act Policy, Whistleblower Policy, and other policies and procedures relating to conduct (the "Conduct Policies"), which together, directly or indirectly, set out Bird's policies and procedures that are intended to protect human rights.

Purpose

Bird and its subsidiaries and affiliates require that all Employees of the Company observe the highest levels of personal and professional ethics. Ethical behaviour is entrenched in our values and forms a core component of our Company.

Policy

The Company is committed to respecting human rights and the Company's board of directors (the "Board"), executive and management are firmly committed to and intend to ensure compliance with the law.

The welfare of Bird's employees and of the employees of our suppliers and subcontractors is critical to our success. Bird is committed to:

- Supporting and respecting human rights and avoiding complicity in human rights abuses, including through responsible sourcing;
- Performing work without the use of forced, compulsory, bonded, indentured or child labour;
- Never using misleading or fraudulent practices during the recruitment of employees or in the offering of employment;
- Treating all workers with dignity, respect, equality, equity, and fairness;
- Prohibiting discrimination based on race, colour, ancestry, place of origin, religious beliefs, gender, gender identity or gender expression, age, disability, marital status, family status, source of income, sex or sexual orientation;
- Conducting all operations in a socially responsible, non-discriminatory manner and in accordance with applicable laws including those associated with equal opportunity, child labour, forced or compulsory labour, working hours, wages and benefits, freedom of association, data privacy, and a harassment-free work environment.



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Governance

This Policy is overseen by the Human Resources and Governance Committee of the Board, and the responsibility and accountability for the management of human rights issues extends across the whole of Bird Construction.

Management of the Company is accountable to the Board for maintaining the highest standards of ethical behaviour and integrity and for creating a work atmosphere that supports our corporate values and the Conduct Policies. The Company will communicate this Policy to all Employees at the time of hire and on an annual basis thereafter.

It is the personal responsibility of all Employees to conduct their activities on behalf of the Company in compliance with applicable laws and this Policy. No Employee has the authority to engage in any conduct or knowingly permit a subordinate to engage in any conduct that contravenes the law or this Policy. Anyone who engages in conduct that contravenes this Policy or the law may be subject to disciplinary or corrective measures, up to and including dismissal. Any manager or supervisor who fails to take reasonable steps to prevent or detect contraventions may also be subject to discipline.

Reporting

Individuals may report or disclose any violations or suspected violation to their immediate supervisor or People and Culture representative.

Any individual who wishes to make a report of any matter under this Policy may do so by contacting Bird's Ethics Hotline. The Ethics Hotline is operated by an independent and unrelated third party (Ethics Point) and offers individuals the choice to report anonymously. Individuals can access the Ethics Hotline either:

- Online by visiting: http://birdconstruction.ethicspoint.com
- By calling: 833-945-1567

The Ethics Hotline is available to intake any report of wrongdoing or related information 24 hours per day, 365 days per year. If you choose to make an anonymous report via the Ethics Hotline, your anonymity will be protected to the fullest extent possible. Once an incident has been reported to the Ethics Hotline, the matter will be reported to Bird and an investigation will be conducted. All reporting and disclosures made under the Policy may be made on an anonymous basis and will be kept confidential to the extent possible.