

Environmental Policy

This Policy has been developed by 407 ETR in recognition of the nature, scale, and potential environmental impacts of all of the activities of 407 ETR in the design, construction, operation, maintenance and rehabilitation of Highway 407.

407 ETR is committed to the prevention of pollution, the principles of sustainable development, and the protection of the environment at all times, while recognizing the corporate objective and obligation of providing safe and efficient operation of Highway 407.

407 ETR will comply with all applicable environmental laws and regulations governing the design, construction, operation, maintenance and rehabilitation of Highway 407.

Without limiting the foregoing statement, 407 ETR, in accordance with this Policy, will address environmental issues that could occur in the course of the design, construction, operation, maintenance and rehabilitation of Highway 407 ETR, in a manner that is at least comparable to a controlled access King's Highway in the Province of Ontario.

Where applicable, 407 ETR will contractually require its vendors/suppliers to adhere to appropriate environmental requirements for any services provided to 407 ETR.

407 ETR will engage in periodic evaluation of its environmental performance to identify opportunities for continual improvement in the course of the design, construction, operation, maintenance and rehabilitation of Highway 407 ETR.

407 ETR will provide appropriate education and training to its employees to foster an understanding of the principle of environmental stewardship, and to enable them to conduct their activities in an environmentally responsible manner.

407 ETR will adopt a consultative approach to addressing the requirements of relevant ministries, departments, agencies, authorities, stakeholders and other persons with environmental interests in Highway 407 ETR.

This Policy and the Corporate Environmental Management Plan (the "**Corporate EMP**"), will be reviewed periodically and revised as necessary to reflect changes in 407 ETR's activities, the conditions under which it conducts business, or any changes to applicable regulatory and legal environmental requirements.

This Policy and the Corporate EMP will be communicated to all employees, contractors, consultants, suppliers, agents and other representatives of 407 ETR and its affiliates in order that they may recognize their environmental responsibilities and share in the stated commitments, as appropriate. (See [Communication of Environmental Policy](#) for details)

This Policy will also be made available to the public through 407 ETR's corporate website. (www.407etr.com).

If you have any questions regarding 407 ETR's Environmental Policy, please contact us by mail:

At: **Office of the President**
6300 Steeles Avenue West Woodbridge,
Ontario Canada L4H 1J1

Policy Guidelines

This Policy is based on the following principles and provides a framework for setting and reviewing 407 ETR's environmental objectives and targets:

1. [Environmental Pollution Prevention](#)
2. [Management Commitment](#)
3. [Corporate Awareness](#)
4. [Stakeholder Awareness and Participation](#)
5. [Performance Monitoring and Reporting](#)
6. [Communication of Environmental Policy](#)

1. Environmental Pollution Prevention

407 ETR affirms its conviction that sustainable development can only be achieved through the respectful use of natural resources. 407 ETR has developed an understanding of the significant environmental aspects of its activities and subjects these to periodic reviews and updates.

407 ETR will strive to avoid significant adverse effects from its activities on its employees, contractors, suppliers, adjacent communities and the natural environment within which Highway 407 ETR is located or, where this is not possible, to minimize such effects. To ensure regulatory compliance, 407 ETR will stay abreast of new and evolving environmental laws and regulations, and will incorporate relevant changes in the Corporate EMP.

2. Management Commitment

This Policy has been acknowledged and agreed to by 407 ETR's management; and approved and adopted by the Board of Directors of 407 International Inc. (the "Board"). 407 ETR's management is responsible for actively communicating this Policy to all Personnel. This Policy and overall environmental performance will be reviewed periodically by 407 ETR's management.

3. Corporate Awareness

407 ETR's contractors, consultants, and suppliers are made aware of 407 ETR's environmental commitments and are required to act co-operatively in achieving these goals and objectives. 407 ETR retains qualified service providers to assist in meeting its environmental obligations and statutory requirements. 407 ETR employees will receive training that is relevant to, and consistent with, their environmental responsibilities.

4. Stakeholder Awareness and Participation

407 ETR is fully cognizant of the degree to which stakeholder involvement can affect the implementation of its plans for improvement of Highway 407, particularly in relation to securing government approvals, permits and authorizations. 407 ETR is committed to working with regulatory agencies and the public to ensure that established environmental commitments are carried through to relevant facets of its operation. This involves appropriate information transfer at stakeholders' reasonable requests and strategic engagement of regulatory agency representatives to facilitate project approvals and achieve Highway 407 improvement objectives (e.g. involvement in the development of environmental protection, mitigation and compensatory strategies, plans and designs).

5. Performance Monitoring and Reporting

The Corporate EMP has been established to provide that environmental objectives and targets are being met through the practice of regular inspection, monitoring, review, tracking, and reporting, and how nonconformities have been addressed in a timely fashion.

This involves the use of appropriate records and the preparation of reports that will summarize environmental incidents; items identified as requiring corrective or preventative action; environmental commitments performance; any internal or third party auditing that has been conducted; any changes made to the Corporate EMP documentation; and any improvement actions initiated. This reporting can also be used by 407 ETR's management in conducting internal reviews of this Policy and Corporate EMP.

For the purposes of Board reporting under this Policy, a “**material environmental incident**” is defined as the release of a substance or contaminant on or in relation to Highway 407 ETR that may have a material, adverse effect on the natural environment, plant life, animal life, and/or human life, health or safety, including damage to property or interference with the normal conduct of business.

The Board will be:

- (a) notified at the next meeting of the Environmental, Health & Safety Committee of the Board of any material environmental incident that occurred since the last meeting; or (b) notified immediately of a particular material environmental incident if warranted, as determined by 407 ETR's management following a consideration of the relevant facts, including the results of any assessment performed by the Ministry of the Environment, in accordance with the *Environmental Protection Act*,
- provided annually with a report on the implementation and operation of this Policy and the Corporate EMP; and
- provided annually with a certificate of compliance with this Policy and the Corporate EMP.

by the appropriate 407 ETR personnel responsible for ensuring environmental compliance by 407 ETR, as determined by 407 ETR's management.

6. Communication of Environmental Policy

The purpose of Environmental Policy communication within the context of environmental management is to both raise the awareness of the importance of environmental management, as well as raise general environmental awareness of employees, contractors, suppliers and external interested parties.

The table below outlines 407 ETR's approach to Environmental Policy communication to employees, contractors, consultants, suppliers, and external parties.

Target Audience	Approach Method	Output Record	Notes/Considerations
Stakeholders, External Parties	<ul style="list-style-type: none"> • Ensure current Environmental Policy is available on 407 ETR's Website. • Maintain process to track and respond to stakeholder requests for published environmental documentation. 	<ul style="list-style-type: none"> • Environmental Policy posted on www.407etr.com. • Record of Contact and response. 	<ul style="list-style-type: none"> • External communication process should clearly identify responsibility by role. • Provide training to identified roles. • Create a 'form' reply letter thanking stakeholder for inquiry; with President and CEO signature.
Contractors/ Consultants	<ul style="list-style-type: none"> • Ensure specific regulatory requirements are included in Contract documents 	<ul style="list-style-type: none"> • Signed copy of contract Package. 	
Suppliers	<ul style="list-style-type: none"> • Ensure, where applicable, environmental regulatory requirements are included in contract (e.g. disposal of transponders or computer equipment) 	<ul style="list-style-type: none"> • Signed copy of contract. • Certificate or proof of compliance to regulatory requirement. 	
Employees (New)	<ul style="list-style-type: none"> • Include Environmental Policy in 'New Employee' Orientation' package. 	<ul style="list-style-type: none"> • Signed copy of Orientation Acknowledgement. • Copy of "New Employee Orientation" package. 	
Employees (Existing)	<ul style="list-style-type: none"> • Ensure Environmental Policy available through TIL. • Communicate any changes to the Environmental Policy. 	<ul style="list-style-type: none"> • Newest version of Environmental Policy on TIL • Newest version of Corporate EMP on TIL 	<ul style="list-style-type: none"> • Environmental Policy and Corporate EMP is versioned using SharePoint functionality.
Employees (Senior)	<ul style="list-style-type: none"> • Annually review Environmental Policy and Corporate EMP 	<ul style="list-style-type: none"> • Environmental Policy or Corporate EMP updated to reflect any change resulting from review. 	<ul style="list-style-type: none"> • Continuous improvement and updating.

Updates to 407 ETR Environmental Policy

Any changes to the 407 ETR Environmental Policy and procedures shall be acknowledged in the Environmental Policy in a timely manner. 407 ETR may add, modify, or remove portions of this policy when it is appropriate to do so.