

# NORTHSTAR STANDARD



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**Live with Synergy Every Day**

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## **NORTHSTAR CODE OF BUSINESS CONDUCT**

### **NORTHSTAR Code of Conduct:**

#### **NORTHSTAR's People**

We are measuring our success not only by the results we achieved, but also by how we were achieving them. Every decision we made and every action we take mostly be driven by the highest sense of business and professional integrity. The result is a safe and trusting work environment, a more unified team and, ultimately a company culture that offers each of the employees' opportunities to succeed.

#### **NORTHSTAR's Diversity, Respect in the Workplace**

When we respect the diversity of our workplace, we create an inclusive environment where everyone can perform to their highest potential. We give Respect and expect to take Responsibility. We avoid quantifiable traits such as race, gender, age or ethnicity to define diversity; those words don't capture our broader sense of the term. Instead, we address our differences in background, viewpoint, personal style and how these can be woven together to form a stronger team. The diversity strategy at **NORTHSTAR** enables us to maximize the unique talents and experiences of each employee to create the best possible competitive advantage.

#### **NORTHSTAR's Labour Policy**

Respect for human rights and dignity is a cornerstone of our business.

- We believe that working positively and directly with employees best serves their interests.
- We strive to work cooperatively with duly chosen employee representatives in the common pursuit of the interests of the employees and the Company's mission.
- We do not use forced or involuntary labour.
- We comply with all applicable child labour laws.

## **NORTHSTAR's Health and Safety in the Workplace**

We maintain a safe and healthy work environment and are committed to eliminating work-related injuries and illnesses.

## **NORTHSTAR's Business integration.**

NORTHSTAR is respected as a modern builder of choice and a for present and future generation. Through financial integrity and strong governance, we have successfully established credibility in the construction marketplace with clients as a consistent in quality and reliability.

## **Business and Financial Records**

Business and financial records are essential to NORTHSTAR's success. The integrity and accuracy of these records help internal decision-making and are the basis of our reporting to developers, investors, creditors, government agencies and other stakeholders.

We treat our employees, sub-contractors, suppliers, clients and financial partners (Lenders) as well as vendors as our stake holders in successful growth of our organisation.

## **We as NORTHSTAR make sure:**

- Keep and present all NORTHSTAR's records and reports in accordance with the law. These records include accounting records as well as any other electronic or written records such as expense reports and time sheets, medical claim forms, personal reviews and the wide variety of analytical engineering and technical reports
- Establish and maintain a system of strong and effective internal controls
- Ensure that all company records accurately and fairly reflect the underlying transaction.
- Never falsify any document.
- Record all financial transactions in the proper account department and accounting period
- Ensure that all actions and commitment are in accordance with NORTHSTAR's authorisation Policy and Delegation of Authority.

- Validate that all public communication including reports to government authorities are full fair accurate timely and understandable.
- Raise any concern about the accuracy of NORTHSTAR's records with finance management or through another appropriate channel such as NORTHSTAR's ethics committee and Internal Auditing

### **Substance Abuse in the Workplace**

NORTHSTAR is committed to the safety, health and security of employees, our operations and all those who come into contact with them. We will not tolerate substance abuse in the workplace

- Employees are expected to work free from the influence of any substance that could affect judgment or safety on the job.
- We do not permit the use, possession or sale of drugs, controlled substances or drug paraphernalia on NORTHSTAR premises, in NORTHSTAR vehicles or while conducting NORTHSTAR business.
- We do not permit the use or possession of alcohol in NORTHSTAR vehicles or on NORTHSTAR premises, except for certain on-site social events where permission has been given in advance.
- NORTHSTAR also reserves the right to conduct drug and alcohol testing as permitted by local law.

### **Violence in the Workplace**

NORTHSTAR will not tolerate acts of violence, including verbal or physical threats, intimidation, harassment and coercion.

- Weapons, firearms, ammunition, explosives and incendiary devices are prohibited on Company property. In some locations, the law provides limited exceptions to the prohibition of firearms on Company property.
- Immediately report to a supervisor or Security any behaviour that has the potential to become violent or that threatens the safety of people or property.
- For more detailed information regarding the rules for your location, please contact our head office. NORTHSTAR management or Security reserves the right to search any item on Company property, including offices, desks, computers, purses, briefcases, automobiles, packages and lockers, at any time, as permitted by local law.

## **Conflicts of Interest**

We are expected to avoid situations where personal interests conflict, or appear to conflict, with those of the Company. This includes any activity that may cause others to doubt our fairness or interferes with our ability to perform our job objectively. If there is a chance that a situation might be perceived as a conflict of interest, we must disclose it to a supervisor, HR or the NORTHSTAR Management committee and take steps to get it resolved.

Common conflict of interest situations include:

- Having a financial interest in a company that does business with NORTHSTAR
  - Receiving compensation or other incentives from a company that does business with NORTHSTAR.
  - Holding a second job that interferes with our ability to do our NORTHSTAR job.
  - Hiring a supplier, distributor or other agent managed or owned by a relative or close friend.
  - Engaging in a romantic relationship with a person you report to, or who reports to you.
- Conflicts of interest can take many forms. The Code can't address every potential conflict of interest situation, so we must use good judgment and seek guidance when unsure

## **Outside Interests**

As employees, we should avoid investments or other financial interests that could interfere, or appear to interfere, with our ability to make decisions in the best interest of the Company.

We must not:

- Hold a financial interest in any NORTHSTAR clients, supplier, sub-contractors or agent if we are in a position to affect NORTHSTAR's business relationship with them.
- Take any opportunity for business or profit that belongs to NORTHSTAR, or compete with the Company in any way.

## **Use and Protection of Company Resources and Information**

We all have an obligation to protect NORTHSTAR's resources and use them properly with optimum way by planning with **Just In Time**.

As employees we are expected to:

- Use Company funds legally and responsibly.
- Safeguard NORTHSTAR's resources from theft, waste and carelessness.
- Not to use Company funds or other resources to support an outside business or unauthorized activity.

Examples of Company resources include:

- Company funds, credit cards and other accounts.
- Computers, electronic networks and other office equipment.
- Telephone and mobile communications devices.
- Internet access and e-mail.
- Supplies

### **Company proprietary information and Records Management**

We are all responsible for maintaining the integrity of NORTHSTAR information and for using it appropriately. Unauthorized disclosure of NORTHSTAR information could harm the Company or give an unfair advantage to others.

This means we:

- Classify documents according to NORTHSTAR's Information Handling Policy.
- Retain and discard Company records consistent with the NORTHSTAR Records Management Policy and schedules.
- Follow all special record-keeping requirements issued with respect to internal investigations, litigation and government inquiries.
- Report loss of any NORTHSTAR information in a timely manner.
- Observe all contractual obligations to safeguard others' information, and do not disclose the proprietary information of others.
- Limit access to sensitive, proprietary or highly confidential information to those who are trained in the proper handling of such information.
- Do not discuss NORTHSTAR information where the conversation may be over heard or compromised. If it is necessary to share proprietary information outside the Company, we must first consult a Legal Department of NORTHSTAR to ensure that adequate protections, such as a confidentiality agreement, are in place.

Examples of NORTHSTAR proprietary information include:

- Any NORTHSTAR Business development (BD) information
- NORTHSTAR Trade secrets
- NORTHSTAR Employee Personnel records
- NORTHSTAR Business plans and proposals
- Capacity and production information

We must obtain appropriate approval for external presentations that contain NORTHSTAR information. Even after we leave NORTHSTAR, we have an obligation to protect the Company's proprietary information.

### **Data Privacy**

Consistent with NORTHSTAR's Value of Respect for People, we respect the privacy of individuals and protect their personal data.

- We handle personal data responsibly and in accordance with the Data Protection/Privacy Policy, any contractual Obligations and local laws.
- We use personal data only for legitimate business purposes.
- We are open and transparent about the purposes for which we use personal data.
- We protect personal data from unauthorised disclosure.
- We limit disclosure of sensitive personal data to those who are under professional obligations of confidentiality and who are trained in the proper handling of this kind of information.

Examples of "personal data" include: address, age, employment, and educational and training information.

Some examples of "sensitive personal data" include: medical information, financial account numbers, race, religion, sexual orientation, criminal convictions and political affiliations.

### **Responsibilities of Supervisors and Leaders**

Actions speak louder than words, and we hold our leaders to a higher standard. Partners, Directors, Managers, Engineers and Supervisors are expected to model appropriate behaviour, ensure that employees have the resources they need to conduct business ethically, encourage discussion and be responsive to any concerns.

### **Global Citizenship**

At NORTHSTAR, we conduct our business with the recognition that we all live together on a planet with limited resources. Making the most of the resources we have and accelerating progress on efficient and renewable solutions are not only a strategic imperative, they are integrated in our Values. So everything we do and how we do it matters on the Global Environment.

### **NORTHSTAR's Core Values**

- To ensure the prosperity and well-being of **NORTHSTAR'S** employees, clients and stakeholders, growth is essential. How we achieve this objective is as important as the objective itself. Fundamental to our success are the core values we believe in and practice.

- Employees are the source of the success where **NORTHSTAR** enjoys its fruits and re invest in the people. We communicate openly, treat each other with respect, promote teamwork and encourage personal initiative and growth. Excellence in performance is sought and rewarded.
- Clients receive our strongest commitment to meet their needs with high-quality work and superior finishes.
- Process and Construction are based on innovative technology, continuous improvement and added value for our clients and end-users.
- Our conduct demonstrates a deep concern for human safety and environmental stewardship, while embracing the highest consistency in quality, reliability, standards of ethics and true global citizenship.

### **Compensation & Recognition**

Everybody likes to feel good about their jobs because they feel they are making a difference in the world, but earning enough money to provide a comfortable living for ourselves and our families is also a high priority. At **NORTHSTAR**, we help you accomplish this goal several ways.

#### **Salaries**

At **NORTHSTAR**, you are rewarded with very competitive pay based on job requirements and your performance relative to your peers. We pay more to our top performers than other leading companies. Your monthly base salary, however, is just the start of your total compensation.

#### **Annual Bonuses**

Eligible employees participate in our annual company bonus plan. This plan links employee pay to company and personal performance. It's our way of showing that when the company does well, **NORTHSTAR** people benefit, too, as our employees are the ones who made the performance possible in the first place.

#### **Recognition**

We also offer rewards in the form of:

- A recognition program by way of appreciation (Letter of Appreciation)
- An employee Investment and involvement plan (Independent builder program)
- Investment Options
- Professional accomplishment recognition (e.g. promotions, Increments)



## Employee Assistance Program

The Employee Assistance Program at **NORTHSTAR** provides professional, confidential counselling for all employees and their family members for a variety of problems including: stress, depression, relationship issues, workplace issues and substance abuse. **NORTHSTAR** professional counsellors are available at no cost to the employee by Telephone

## Why Work with NORTHSTAR

Why work with **NORTHSTAR**? One big reason is impact and synergy.

Due to the proactive consolidation resulting in fewer layers of management today, as a **NORTHSTAR** team member you have the freedom and opportunity to directly impact business performance from your first days on the job.

We have a strong Career Development program to help you achieve all of your career goals and ambitions. We also offer outstanding pay and recognition programs.

We provide you with first class tools to help you manage your health, your future financial security and your family's future.

At **NORTHSTAR** you will have opportunities to work with and learn from top calibre people from all walks of life and all corners of the globe

# Northstar Standard

COMMITMENT . RELIABILITY . QUALITY

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**Our commitment is**

- ★ **Delivering Happiness,**
- ★ **Creating Tranquility,**
- ★ **Blend with Innovation.**

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