

**SUPERIOR PLUS CORP.**

**CRISIS PREPAREDNESS AND COMMUNICATION POLICY**

<b>First Approved by Board:</b> November 7, 2018	<b>Policy Review Cycle:</b> Annually
<b>Current Version Approved by Board:</b> August 13, 2019	<b>Responsible Executive:</b> President, Specialty Chemicals and Executive Sponsor
<b>Supersedes Version Approved:</b> November 7, 2018	

**Purpose:**

The purpose of this Policy is to outline the minimum standard for crisis preparedness, and to describe the communication protocol expectations for the Superior Group during a Crisis Event. The goal is to:

1. reduce the risk to the Superior Group from injury, loss and damage to the public, its employees, its property and the environment as a result of natural or human-caused emergencies; and
2. facilitate the Superior Group’s effective communication with its shareholders and other stakeholders and minimize any negative impact to its reputation by its response to emergencies.

**Scope:**

This Policy addresses Crisis Events that have the potential to impact any of the Superior Group and its personnel. Site-Contained Emergency Events are outside of the scope of this Policy and are covered in site specific Emergency Response Plans.

**Definitions:**

“Board” means the board of directors of Superior.

“CEO” means the President and Chief Executive Officer of Superior.

“CFO” means the Executive Vice President and Chief Financial Officer of Superior.

“CLO” means the Senior Vice President and Chief Legal Officer of Superior.

“Crisis Event” means an event which may include a fatality, media or public attention and/or potential for off-site impact to public safety or the environment. These events have the potential to impact any the Superior Group.

“HSE Committee” means the Health, Safety and Environment Committee of the Board.



“IR Officer” means the Vice-President, Investor Relations and Treasurer of Superior.

“Policy” means this crisis preparedness and communication policy, as may be amended from time to time.

“Site-Contained Emergency Event” means an event which does not have potential for off-site impact to public safety or the environment and can be handled by the site although it may require divisional corporate or other support.

“Superior” means Superior Plus Corp.

“Superior Group” means, collectively, Superior and each of its divisions, partnerships, affiliates and subsidiaries.

**Policy:**

The health and safety of the public and the personnel of the Superior Group, as well as minimizing harm to the environment, are a priority during a Crisis Event. As such, crisis preparedness at all divisions shall facilitate a timely and appropriate response to Crisis Events and compliance with applicable laws.

In the circumstances, and based on the credible information known by the Superior Group, its communications shall:

- Be timely and clear;
- Show concern and demonstrate compassion;
- Be transparent and forthright;
- Be cooperative with all responders; and
- Demonstrate commitment to address the situation and return to typical operations.

**Crisis Preparedness:**

As a minimum, each business must develop, implement and maintain a Crisis Management Plan and a regulatory compliant Emergency Response Plan per site, with the following processes in place and tools developed:

1. Pre-determined crisis scenarios, based on hazard risk assessments, which identify the most likely scenarios for each operational site.
2. Pre-written, approved media messages that contain the most basic outline of information that might be needed and can be quickly modified with current and pertinent information during a Crisis Event.
3. 24/7 emergency notification system, to ensure clear and timely notification to the Superior Group’s crisis management team.



4. Pre-determined and approved list of internal and external emergency responders and technical advisors, along with their contact information and a means for providing this information in an easily accessible format during a Crisis Event.
5. Roles and responsibilities for responding to a Crisis Event are defined, and training is provided to each person assigned responsibility so that each such person is prepared and competent in their role.
6. Crisis Management drills and exercises are conducted with sufficient frequency to validate, and increase familiarity and confidence with, the plan.
7. Critical data is identified and 24/7 access to such data is ensured.

**Crisis Communication:**

All communications and disclosure undertaken in accordance with this Policy shall also be carried out in compliance with Superior’s *Communication and Disclosure Policy and Practices*.

Superior and all divisions of the Superior Group shall have a communication protocol in place and prior to putting such protocol in place, approval of the CLO and President, Specialty Chemicals shall be obtained. The communication protocol shall include at a minimum the following:

- Regulatory reporting obligations;
- the flow of information from the first identifier of an actual or potential Crisis Event up the internal communications chain, as well as the flow of instructions back down the chain; and
- Table 1 of this policy.

The following communication protocol shall be followed in the event of a Crisis Event with potential impact to Superior:

**Table 1:**

Stakeholder	Relationship Owner/ Communicator	Communication Tool(s)
CEO	Divisional Presidents	Telephone E-mail (for low-severity emergencies)
IR Officer, CFO & CLO	Divisional Presidents	Telephone E-mail (for low-severity emergencies)
Investor Community	IR Officer	Website E-mail Telephone



Board	CEO	Telephone E-mail
Media	IR Officer CEO Divisional Media-Trained Spokespeople	Telephone E-mail Website In person
Employees	CEO Divisional Presidents	E-mail Intranet In person

**Policy Revisions**

The HSE Committee will review and recommend to the Board revisions to this Policy from time to time in order to reflect changes in legal or regulatory obligations or leading practices. Any changes to this Policy must be approved by the Board.