



REPORT ON FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

**Joint Report Pursuant to the Fighting Against Forced
Labour and Child Labour in Supply Chains Act**

Acciona | May 31st, 2024

Modern Slavery Act Report

This report is being issued by Acciona Infrastructure Canada Inc. (the “Entity”) pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) for its most recent financial year ended on **December 31, 2023**. This report outlines the measures ACCIONA has implemented to evaluate the risks associated with modern slavery, encompassing forced labor and child labor, across its operations. This is a joint report that includes Acciona Infrastructure Canada Inc. and the following entities, which meet the thresholds for reporting as set out in the Act: **AIM Roads Inc., Peace River Hydro Partners, Fraser Crossing Constructors General Partnership and Broadway Subway Constructors General Partnership.**

Policies Relating to Forced and Child Labour

ACCIONA upholds the human rights and public freedoms recognized in the United Nations Universal Declaration of Human Rights, and our [Code of Conduct](#), reflects our commitment to ethical practices. All ACCIONA personnel must follow this commitment, conducting their professional activities while respecting human rights and public freedoms.

Further, at ACCIONA, our [Human Rights Policy](#) establishes the principles of responsible business conduct. We strictly prohibit child labor, forced labor, modern slavery, and human trafficking, ensuring the dignity and rights of all individuals within our operations and supply chains. Our policy dictates that ACCIONA shall not be complicit in any form of abuse or violation, holding all subsidiaries, affiliates, suppliers, contractors, and partners accountable for adhering to our human rights standards.

Our aim with suppliers, contractors, and partners, regardless of their organizational structure, is to create relationships grounded in regulatory compliance and adherence to international reference standards. ACCIONA’s [Ethical Principles, for Suppliers, Contractors, and collaborators](#) includes guidelines aligned with internationally recognized human rights standards, including the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, and core conventions outlined in the International Labour Organization (ILO) Declaration.

Furthermore, as a signatory to the Global Compact, at ACCIONA we extend our commitment to the Compact’s 10 principles to its suppliers, contractors, and partners, fostering a culture of ethical conduct and responsible business practices throughout our network of stakeholders. Through the PROCURE-e portal and tendering tool, as well as in the general contracting clauses, all suppliers must accept and commit to comply with the [Ethical Principles for Suppliers, Contractors and Partners](#).

ACCIONA has released its 2023 annual [Non-Financial Sustainability Report](#), encompassing an overview of our human rights policies, code of conduct, and due diligence strategies. This comprehensive document also details our internal and external audit processes aimed at ensuring compliance with these policies. Further, this report provides insight into ACCIONA’s efforts to prevent and address issues related to forced labor, child labor, and modern slavery. By transparently documenting our initiatives and practices, we reaffirm our commitment to ethical business conduct.

Structure and Activities

Acciona Infrastructure Canada Inc. is part of the global Acciona group, specializing in sustainable infrastructure solutions. Acciona Infrastructure Canada Inc. is responsible for various elements of project delivery across the country. This includes projects being completed by the following entities that are subsidiaries of Acciona Infrastructure Canada Inc. and are part of this joint report.

AIM Roads Inc.

AIM Roads Inc. is a corporation operating under the laws of the Province of British Columbia and the federal laws of Canada.

The corporation was established to maintain highways in British Columbia under contract with the British Columbia Ministry of Transportation and Infrastructure. The corporation's primary activities are related to highway maintenance, including snow removal, road repair, and other essential road maintenance services. In addition to these core activities, AIM Roads may also engage in other related tasks that support their primary maintenance responsibilities, such as the procurement of materials and equipment necessary for their operations.

Peace River Hydro Partners

Peace River Hydro Partners ("PRHP") is a general partnership with participation 50% each between Acciona Infrastructure Canada Inc. ("Acciona"), and Samsung Renewable Energy Inc. ("Samsung"), acting under the laws of the Province of British Columbia and the federal laws of Canada.

The general partnership was formed in order to construct the Site C Clean Energy Project – Main Civil Works (the "Site C Project"), generally comprised of excavation for structures and bank stabilization; two diversion tunnels; the construction of a central core zoned earth embankment earth-fill dam; certain roller-compacted concrete buttresses; material management and certain construction and decommissioning works. The British Columbia Hydro and Power Authority awarded PRHP the Main Civil Works Contract on December 18, 2015. The Site C Project is in Fort St. John, British Columbia and the general partnership does not have any material business activities outside of British Columbia, Canada. The general partnership's activities relate principally to those connected to the Site C Project, and other activities that are ancillary to that purpose. Those activities include importation of goods into Canada to facilitate the development and construction of the Site C Project.

Fraser Crossing Constructors General Partnership

Fraser Crossing Constructors General Partnership is a general partnership acting under the laws of the Province of British Columbia and the federal laws of Canada. Its limited partners are AECON Constructors, a division of AECON Constructors Group Inc., a corporation existing under the laws of Canada and Acciona Infrastructure Canada Inc., a corporation existing under the laws of Canada.

The general partnership was formed to construct the Pattullo Bridge Replacement (the "Pattullo Project"). The Project is in New Westminster, British Columbia, and the general partnership does not have any material business activities outside of British Columbia, Canada. The general partnership's activities relate principally to those connected to the Pattullo Project, and other activities that are ancillary to that purpose. Those activities include the importation of goods into Canada to facilitate the development and construction of the Pattullo Project.

Broadway Subway Constructors General Partnership

Broadway Subway Constructors General Partnership is a general partnership acting under the laws of the Province of British Columbia and the federal laws of Canada. Its limited partners are Ghella Canada Ltd., a corporation existing under the laws of Canada and Acciona Infrastructure Canada Inc., a corporation existing under the laws of Canada.

Broadway Subway Constructors General Partnership was formed to construct the Broadway Subway Project (the “Broadway Project”). The Broadway Project is in Vancouver, British Columbia, and the general partnership does not have any material business activities outside of British Columbia, Canada.

The general partnership’s activities relate principally to those connected to the Broadway Project, and other activities that are ancillary to that purpose. Those activities include the importation of goods into Canada to facilitate the development and construction of the Broadway Project.

Supply Chain

The Entity’s supply chain strategy emphasizes local sourcing of materials and services to support the Canadian economy and reduce environmental impact, while also leveraging global supply networks for specialized components. Collaborations with local contractors and subcontractors are important, and all the Entity’s supplier’s must:

- Agree to be bound by Entity’s Code of Conduct.
- Respect and abide by the laws, customs, and business practices of the countries (including, without limitation, applicable health and safety and environmental legislation) in which the activities with the Entity are to be carried out; and
- Comply strictly with the human rights principles set out in the Entity’s Human Rights Policy.

Risk Assessment and Mitigating Actions

Our Canadian operations are at low risk for forced labor and child labor due to the nature of activities related to the delivery of large infrastructure projects, and the legal regime mandated at both the federal and provincial levels, to which we are committed. Further, the Entity’s policies establish that all workers must be 18 years of age to work or to be allowed on work sites. Government issued photo ID is mandatory during the recruitment process to ensure that each employee is of age.

Training to Employees on Forced Labour and Child Labour

At ACCIONA, every employee is required to participate in an online training program centered on our code of conduct. This training comprises a reading section followed by a brief multiple-choice examination. Successful completion of the course mandates correctly answering all questions. The content of the training addresses a wide range of ethical scenarios, outlining the expected conduct for ACCIONA employees.

Remediation Acts

At this time, the Entity has not identified instances of forced or child labor in its activities or supply chains. As such, no remediation measures have been taken to date.

Approval and Attestation

This report was approved by the board of directors the Entity pursuant to section 11(4)(b)(i) of the Act. In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

For clarity, I have provided the attestation above in my capacity as a director of Acciona Infrastructure Canada Inc. and not in my personal capacity.



Name: Carlos Planelles

Title: Director