

AECON-FLATIRON-DRAGADOS-EBC GENERAL PARTNERSHIP

**2023 Report Pursuant to the Fighting Against Forced Labour and Child
Labour in Supply Chains Act**

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I. INTRODUCTION

This report is being issued by Aecon-Flatiron-Dragados-EBC General Partnership (“AFDE GP” or 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. Any information contained on websites referred to in this report is not incorporated by reference.

II. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

a. STRUCTURE

AFDE GP is a general partnership existing under the laws of British Columbia. The partnership consists of: Aecon Constructors, a division of Aecon Construction Group Inc. (the “Managing Party”), Flatiron Constructors Canada Limited, Dragados Canada Inc. and EBC Inc.

b. ACTIVITIES

The Generating Station and Spillways (GSS) Civil Works is a contract with British Columbia Hydro and Power Authority (“BC Hydro”) that is part of the Site C Clean Energy Project, consisting of a dam and generating station located on the Peace River in northeastern British Columbia. AFDE GP oversees the construction of the generating station which includes powerhouse, penstocks, Intakes, and spillways structures (the “Generating Station”). Additional scopes were awarded in relation to foundation enhancement, approach channel and diversion tunnels works (these additional works together with the Generating Station, the “Project”). AFDE GP is responsible for constructing the Project, including the supply of all labour, materials and equipment required, either expressly or by necessary inference, to perform its obligations and construct all structures and related works with respect to the Project.

c. SUPPLY CHAINS

In 2023, AFDE GP worked with approximately 500 subcontractors, vendors and suppliers. The delivery of the Project involves the procurement of goods, materials and services by the Entity. Goods and materials procured in this way vary depending on the scope of work and may include structural steel, reinforcing steel, concrete, aggregates, fuel, electrical and mechanical equipment, industrial consumables and other typical construction materials. The Project also requires the procurement or rental of speciality

construction equipment. Procured services may include design services, hydrovac excavation, crane services, engineering and installation of scaffolding.

The Entity relies on the Managing Party to provide support services including for the review and administration of all new supplier setups by a centralized corporate vendor master team. For more information, please refer to the Managing Party's report pursuant to the Act available from the Managing Party's website at: <https://www.aecon.com/resources> (the "Managing Party Report").

III. POLICIES AND DUE DILIGENCE

As previously noted, the Entity relies on the Managing Party for matters relating to procurement and subcontracting policies. Accordingly, the Entity does not have any separate policies or due diligence processes relating to forced or child labour. For more information, refer to the Managing Party Report.

IV. FORCED LABOUR AND CHILD LABOUR RISKS

AFDE GP's operations are in Canada and understood to be at low risk for forced labour and child labour due to the legal frameworks mandated at both the Federal and Provincial levels and a commitment to implementing those laws.

Our supply chains may include different participants, such as subcontractors, suppliers, recruitment agencies, and various specialized service providers, depending on the specific needs of the Project. As a general partnership that procures goods and services from Canada and from abroad, we have committed to avoiding purchasing "at-risk" goods and services that may unintentionally contribute to the use of forced labour and child labour.

As noted above, the Entity relies on the Managing Party for matters relating to procurement and subcontracting. Accordingly, the Entity has not undertaken a separate analysis to assess the risk of the use of forced or child labour in its business activities and supply chains. For the same reason, the Entity does not have any separate internal policies or procedures relating to the assessment or management of these risks. For more information, refer to the Managing Party Report.

V. STEPS TAKEN IN THE PREVIOUS YEAR TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR

As noted above, the Entity relies on the Managing Party for matters relating to procurement and subcontracting. Accordingly, the Entity has not taken any separate steps in the previous year in this regard. For more information, refer to the Managing Party Report.

VI. REMEDIATION ACTS

a. REMEDIATION MEASURES

The Entity relies on the Managing Party for matters relating to procurement and subcontracting. Based on the information made available to the Entity, the Entity is not aware of any instances of forced or child labour in its activities or supply chains. As such, no remediation measures have been taken to date.

b. REMEDIATION OF LOSS OF INCOME

Similarly, the Entity is not currently aware of any instance where its efforts to prevent the use of forced or child labour in its business activities or supply chains contributed to a loss of income for vulnerable families. As such, no remediation measures have been taken to date.

VII. TRAINING TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

The Entity does not have any employees of its own and relies on the secondment of the partner employees assigned to carry out the project, so does not conduct training activities with regards to forced or child labour. For more information, refer to the Managing Party Report.

VIII. ASSESSMENT OF EFFECTIVENESS OF STEPS TAKEN

Given that the Entity is expected to carry on business for a limited period of time, it has not established a formal process for measuring the effectiveness of mitigation and prevention of the use of forced or child labour in its business activities and supply chains.

As described above, the Entity relies on the Managing Party for matters relating to procurement and subcontracting. Accordingly, the Entity has not undertaken a separate analysis to assess the effectiveness of steps taken by the Managing Party regarding the use of forced or child labour in its business activities and supply chains. For more information, refer to the Managing Party Report.

IX. APPROVAL AND ATTESTATION

This report was approved by AFDE GP Executive Committee 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 Project Director of AFDE GP and not in my personal capacity.



Name: Scott Marshall

Title: Project Director

May 31, 2023

I have the authority to bind the Entity.