

**Green Infrastructure Partners Inc.  
Modern Slavery Act Annual Report  
May 31, 2024**

## **Introduction**

*The Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a joint report for Green Infrastructure Partners Inc. and its subsidiaries which have an obligation to publish a report under the Act as set out in Schedule “A” hereto (collectively, “**GIP**”). This report refers to the 2023 fiscal year end, being December 31, 2023, and describes steps taken by GIP in 2023.

GIP is committed to acting with integrity and ethically in all of its business transactions. Included in that commitment is working collaboratively with its suppliers and contractors to identify and reduce the risk of forced or child labour occurring within its supply chain network. GIP expects its business partners and suppliers (as well as their respective contractors, agents, subcontractors and sub-agents) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

## **GIP Structure, Activities and Supply Chains**

### **Structure**

Green Infrastructure Partners Inc. is a privately owned company formed under the laws of the Province of Ontario. Green Infrastructure Partners Inc. was formed on July 1, 2022, pursuant to an amalgamation with GFL Infrastructure Group Inc. and Ground Force Environmental Corp., and has the following direct or indirect subsidiaries: GIP Paving Inc., GIP Aggregates Inc., Russell Redi-Mix Concrete, Langenburg Redi-Mix Ltd., GIP Pipe Products Inc., Lorvin Steel Ltd., GIP Construction Engineering Corp., West Carleton Sand & Gravel Inc., GIP Construction and Materials Limited, GIP Construction Ontario East Ltd. and GIP Interpaving Ltd. GIP’s head office is located at 100 Commerce Valley Dr. W., Markham, Ontario, L3T 0A1.

### **Activities**

GIP is one of Canada’s largest and most diversified infrastructure companies. GIP offers vertically integrated infrastructure solutions for public and private projects of every size and scale. For over 50 years, GIP and its predecessor’s teams have been designing, delivering, and maintaining infrastructure for Canada’s growing cities. GIP’s five main categories of activities include:

- Integrated Infrastructure Solutions;
- Specialty Infrastructure Solutions;
- Materials Engineering;
- Alternative Procurement; and
- Construction Engineering.



As it pertains to the pursuits undertaken by GIP in relation to the production of goods, GIP produces and sells asphalt, ready mix and pre-cast concrete pipe and structures; extracts, produces and sells aggregates; fabricates and installs structural steel; and sells and distributes asphalt cement, emulsions, and related products.

### Supply Chains

GIP is committed to respecting human rights and upholding ethical business practices in all aspects of its operations, which includes its relationships with its suppliers. GIP's suppliers provide a variety of goods and services to facilitate its business dealings and are primarily based in Canada and the United States<sup>1</sup>. GIP aims to work with reputable, well-established suppliers and is continuously evaluating its relationships with its key suppliers to ensure its short- and long-term goals are being met, including respecting and abiding by the applicable human rights and employment standards laws.

### GIP Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

GIP utilizes formal policies, codes of conduct and a diligent governance framework to address the risk of modern slavery, to protect human rights and to create a safe and inclusive work-environment for all employees. GIP's relevant policies and due diligence and training processes are described below.

### Supplier Code of Conduct

GIP's Supplier Code of Conduct (the "**Supplier Code**") sets out its expectations of suppliers of goods and services when conducting business with or for GIP. It makes clear that GIP is committed to conducting business in an ethical, legal and socially responsible manner, and that GIP aspires to work with suppliers who share GIP's core beliefs, values and commitment to performance with integrity.

The Supplier Code establishes that:

- compliance with the Supplier Code is a fundamental requirement of all agreements between GIP and its suppliers;
- suppliers are required to comply with the Supplier Code and to ensure that its employees and representatives understand and comply with the Supplier Code;
- failure to adhere to the Supplier Code may be grounds for termination of the supplier relationship; and
- GIP will not under any circumstance knowingly engage any suppliers that exploit children, including recruiting child labour and any suppliers that engage in any form of forced labour.

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<sup>1</sup> Both countries having a low prevalence of modern slavery - <https://www.walkfree.org/global-slavery-index/map/>.



## Human Rights Policy

GIP maintains a comprehensive Human Rights Policy (the “**HR Policy**”) that applies to all personnel who are engaged to provide services to GIP. In the HR Policy, GIP prohibits the following in all of its operations:

- the use of all forms of forced labour, child labour;
- any form of human trafficking or slavery; and
- the hiring of individuals that are below the age of majority, as defined by applicable law, for positions involving potentially hazardous work.

The HR Policy further establishes that GIP will not engage in any activities that encourage human rights abuses or that support trafficking in persons or the use of child or forced labour.

## Code of Ethics and Business Conduct

GIP has adopted a Code of Ethics and Business Conduct (the “**Code of Ethics**”) that applies to all directors, officers, employees and persons acting as authorized agents of GIP. It embodies GIP’s commitment to conducting its business with integrity, honesty and respect, in compliance with all applicable governmental laws, regulations and policies, and in a manner that preserves its reputation and deters unethical behavior and wrongdoing. The Code of Ethics provides an overview of the requirements, standards and expectations to guide all GIP representatives in carrying out their duties for, dealings with, and when acting as a representative in any capacity of GIP.

It is a requirement that all GIP representatives become familiar with the Code of Ethics and apply its principles in the performance of their duties and responsibilities to GIP. All representatives have a duty to timely report any conduct that may be in violation of the Code of Ethics and to seek advice if they have any questions whatsoever about the application of the Code of Ethics to any circumstance or situation that a GIP representative may face.

## Whistleblower Policy

GIP maintains a Whistleblower Policy that requires employees to promptly report when, among other things, there has been a violation of the Code of Ethics or a violation of any external law, rule or regulation. The reports can be made anonymously, and subject to any applicable laws and regulations, GIP will maintain the confidentiality of complaints and the identity of the person making the complaint (if disclosed).

## Training

As part of the onboarding process, each new employee is provided an Employee Policy Guide called “The Way We Work”. The Way We Work includes all pertinent policies and codes GIP employees must know and be familiar with, including the Code of Ethics, HR



Policy, Whistleblower Policy and a number of supporting human resource and safety policies.

### **Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour**

In fiscal 2023, GIP took the following steps to prevent and reduce the risk of forced labour or child labour in its supply chains:

- Reviewed and updated the Supplier Code to ensure its compliance with regulatory requirements and best practices;
- Completed reviews of supplier operations and practices as part of GIP's supplier assessment program prior to supplier selection; and
- Updated the form of supplier contracts to adhere to the provisions and obligations of both the Supplier Code and the HR Policy, and requiring audit rights, where applicable.

### **Risk of Forced Labour and Child Labour in GIP's Business and Supply Chains and Remediation**

GIP has concluded that its supply chains carry a low risk of forced labour or child labour. GIP has not identified (a) any forced or child labour in its supply chains or (b) any loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its supply chains. Accordingly, GIP did not take any corresponding remedial measures in 2023.

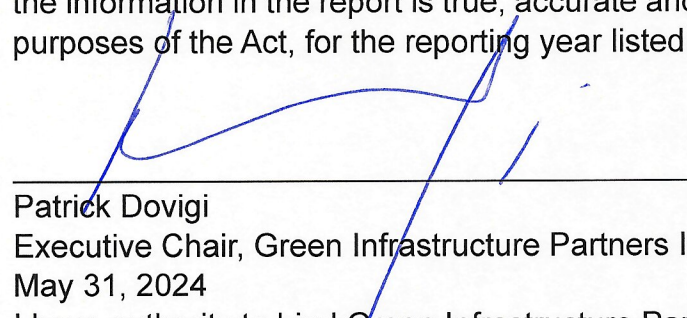
### **Assessing GIP's Effectiveness**

As GIP did not identify any forced labour or child labour or material risks of forced labour or child labour in its activities and supply chains in 2023, a formal assessment process with regards to GIP's effectiveness in ensuring that forced labour and child labour was not being used in GIP's business and supply chains was not implemented. That said, GIP regularly undertake audits and reviews of various aspects of its business operations. The effectiveness of its business practices and compliance with all applicable laws (including those in relation to forced labour and child labour) are in scope for these assessments. Furthermore, GIP continually monitors and improves its company policies as any deficiencies are discovered.

## Approval and Attestation

This report has been approved by the Board of Directors of Green Infrastructure Partners Inc. and on behalf of the Board of Directors of each joint reporter identified in Schedule "A" hereto.

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.



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Patrick Dovigi  
Executive Chair, Green Infrastructure Partners Inc.  
May 31, 2024  
I have authority to bind Green Infrastructure Partners Inc.



**Schedule “A”  
Joint Reporters**

GIP entities required to publish a report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and are therefore covered by this group report are:

- GIP Paving Inc.
- GIP Paving (Canada) Inc.
- Langenburg Redi-Mix Ltd.
- Russell Redi-Mix Concrete
- GIP Construction & Materials Limited
- West Carleton Sand & Gravel Inc.
- GIP Construction Ontario East Ltd.
- GIP Interpaving Ltd.