

Groupe Nouveau Pont Île-aux-Tourtes Inc.

and

Construction Nouveau Pont Île-aux-Tourtes General Partnership
2023 Report on Fighting Against Forced Labour and Child Labour in
Supply Chains

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I. STATEMENT DEVELOPMENT AND APPROVAL SUMMARY

Groupe Nouveau Pont Île-aux-Tourtes Inc. ("GNPIAT") and Construction Nouveau Pont Île-aux-Tourtes General Partnership ("CNPIAT") (taken together, the "Entities") have prepared, the herein Report on Fighting Against Forced Labour and Child Labour in Supply Chain ("Report"), covering the period of January 1, 2023, to December 31, 2023. The Report is made pursuant to section 11 of *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the "Act").

The Report is the product of consultations within relevant the Entities' departments, including Legal, Human Resources, Finance, Procurement, and Health and Safety, which operate across the Entities. This consultation process has supported our enterprise-wide approach against forced labour and child labour.

In conformity with section 11 (4) and 11 (5) of the Act, this Report has been reviewed and approved by the Executive Committee Members of the Entities, whose names appear below, on their behalf on May 22, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the Entities. Based on our knowledge, and having exercised reasonable diligence, we 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.

Mirsad Hairlahovic

President and Board of Directors of GNPIAT

Date May 22, 2024

Signature

DocuSigned by:
Mirsad Hairlahovic
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Jérémie Gariépy Théorêt

Secretary and Board of Directors of GNPIAT

Date May 22, 2024

Signature

DocuSigned by:
Jeremie Gariépy Théorêt
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Brice Charlier

Vice President and Board of Directors of GNPIAT

Date May 22, 2024

Signature


DocuSigned by:
Brice Charlier
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We, the officers and board of directors, have the authority to bind Groupe Nouveau Pont Île-aux-Tourtes Inc.

Mirsad Hairlahovic

Executive Committee Member of CNPIAT

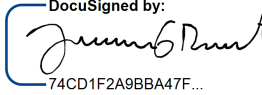
Date May 22, 2024

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Jérémie Gariépy Théorêt

Executive Committee Member of CNPIAT

Date May 22, 2024

Signature  74CD1F2A9BBA47F...

Brice Charlier

Executive Committee Member of CNPIAT

Date May 22, 2024

Signature  ECB33412CED64F0...

We, the Executive Committee Members, have the authority to bind Construction Nouveau Pont Île-aux-Tourtes General Partnership.

II. INFORMATION ADDRESSING THE REQUIREMENTS OF SUBSECTION 11(3) OF THE ACT

A. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

STRUCTURE

GNPIAT is corporation incorporated in 2022, pursuant to the Québec Business Corporations Act, chapter S-31.1, with its place of business located in Montreal.

CNPIAT is a general partnership duly registered, in 2022, under the Civil Code of Quebec with its place of business located in Montreal.

Both Entities are constituted by the following corporate entities:

- (i) Dragados Canada, Inc.;
- (ii) Roxboro Excavation Inc.; and
- (iii) Construction Demathieu & Bard (CDB) Inc.

The Quebec *Ministère des Transports et de la Mobilité durable* (“MTMD”) awarded to Groupe Nouveau Pont Île-aux-Tourtes Inc. (“GNPIAT”) the contract for design, construction and financing for the construction of the new Île-aux-Tourtes bridge and deconstruction of the original Île-aux-Tourtes bridge, which bridge links the Island of Montreal (the Village of Senneville) to the Montérégie region (City of Vaudreuil-Dorion), the project (the “Project”). GNPIAT, in turn, subcontracted the design and construction of the Project to Construction Nouveau Pont Île-aux-Tourtes General Partnership (“CNPIAT”), by way of a design and construction contract. The Île-aux-Tourtes Bridge is a key infrastructure and part of the strategic road

network supporting commercial exchanges, used by nearly 87,000 vehicles daily, including around 10% trucks (2019 data). With respect to the corporate entities comprising the Entities as the latter have been defined herein:

- (i) Dragados Canada, Inc. is the Canadian construction arm of Dragados, S.A., itself a subsidiary of ACS Actividades de Construcción y Servicios, S.A. (“ACS Group”). ACS Group is a large, publicly traded company comprised of multiple companies and over 128,000 employees worldwide. The ACS Group collectively has over 40 years of experience in developing, financing, operating, and maintaining infrastructure.
- (ii) Roxboro Excavation Inc. boasts over 50 years of operation and over 600 employees in peak season. Highly respected in the construction industry, Roxboro Excavation Inc. is an indispensable leader in its field. The company offers a variety of services and relies on expert teams in civil engineering, environment, paving, earthmoving, infrastructure, sewers and watermains, as well as snow removal.
- (iii) Construction Demathieu & Bard (CDB) Inc. is the Canadian construction arm of La Financière Demathieu & Bard Inc., itself a subsidiary of Demathieu Bard Holding 4 S.A.S. Construction Demathieu & Bard (CDB) Inc. is headquartered in St-Jérôme, Quebec with over 300 employees and has built its reputation since 1997 thanks to its expertise, perseverance and passion on bridges, tunnels, viaducts and hydroelectric projects.

ACTIVITIES

The Entities’ sole purpose is the construction of the Project. At the core of the Entities’ strategy lies the fundamental principle of conducting our business operations sustainably and responsibly while adhering to the highest standards of business ethics, quality, safety, and environmental stewardship.

SUPPLY CHAIN

In 2023, the Entities worked with approximately 236 domestic and international suppliers with key areas of spend including materials such as concrete, steel, piping, and asphalt, industrial/engineering, consumables such as fuel, personal protective equipment (PPE), subcontractors such as electricians, plumbers, borers and other tradespeople, labour hire, insurance, professional services, technology, and telecommunications.

The products and services we procured are utilized in designing, financing, and constructing, the Project. In this regard, parts may be sourced locally or imported.

In addition to procuring products and services, we also engage in procuring services related to commercial aspects of the Project, such as accounting, legal and IT services, and professional consulting services, such as design and engineering. These services complement our internal resources for either short or long-term engagements as required.

B. POLICIES AND DUE DILIGENCE PROCESSES

The Entities have maintained a business commitment with the different persons or entities that interact with them and their employees based on ethical principles that guide the functioning of the Entities and are part of our business culture.

We are committed to ensuring that there are no human rights violations, including modern slavery or human trafficking, in our supply chains or in any part of our business. The Entities are committed to acting ethically and with integrity in all our business relationships, and we expect the same high standards from all our subcontractors, suppliers, and other business partners.

OUR POLICIES

Governance and Leadership

Our governance framework is founded on our core values of integrity, quality, client satisfaction, people, corporate citizenship, accountability, and honesty, the whole underpinned by safety. These values guide all of the Entities' activities and form the basis of our *Code of Business Ethics and Code of Conduct* and our *Code of Conduct for Business Partners*, which set the standard of behaviour we expect from all our employees, subcontractors, and partners.

Compliance

The Entities adopted the Codes both of which include a link to the Ethics Channel of the Entities, which detail the different channels that can be utilized to report unethical and illegal behaviour, the mechanisms offered to protect subjects involved in a complaint, and the roles and responsibilities, among others.

The Entities are committed to upholding human rights through a variety of codes and policies, including, among others:

- **The Code of Business Ethics and Code of Conduct**, which establishes guidelines for all Entities' members to follow as part of their mission, values, and corporate culture. All employees are required to read and acknowledge this code.
- **The Code of Conduct for Business Partners**, which sets minimum standards of behaviour expected from business partners, including the protection of human rights.
- **A robust Health and Safety Program**, which plays an essential role in protecting human rights. These policies include the Health and Safety Policy, Prevention of Conjugal Violence in the Workplace, Harassment and Discrimination, Sexual Harassment Policy, among others.

These standards are essential pillars on which the Entities ensure compliance with applicable laws, by ensuring that all employees acknowledge and sign the *Code of Business Ethics and Code of Conduct*. Under this Code the Entities and their employees undertake to be good corporate citizens by making social responsibility and respect for the law an integral and intrinsic part of their business activities and relationships.

The Entities require that their business partners act at all times in accordance with the United Nations Global Compact, the objective of which is the adoption of universal principles including those relating to the protection of Human Rights. Business partners are also required to act diligently and responsibly to prevent, detect or mitigate situations that may compromise nationally or internationally recognised human and labour rights regardless of the country in which they operate. Business Partners must also reject any activity linked to human trafficking and any form of slavery.

Procurement

The Entities ensure that all procurement activities are conducted in compliance with applicable laws and in conformance to the highest ethical standards in business practices.

Our Project utilizes procurement frameworks which prescribe policy, systems, and processes to support supply chain due diligence. Activities include conducting due diligence of the main subcontractors and suppliers. As part of the framework, our Project has a questionnaire for assessment and a suite of mandatory template commercial contracts which include the commitment of our business partners to adhere to our *Code of Conduct for Business Partners* and act ethically and in compliance with applicable laws and regulations.

This approach is key for the Entities and the Project, to build and maintain a reliable and trusted supply chain and to proactively identify and manage risks throughout the term of each contract.

OUR DUE DILIGENCE PROCESSES:

In 2022 the Entities submitted their proposal within the Request for Proposals process. The Entities executed the contractual agreements relating to the Project in April of 2023. For the year 2023, the Entities were in start-up mode, and proceeded to prepare processes for implementation. The Entities adopted the *Code of Business Ethics and Code of Conduct* and their *Code of Conduct for Business Partners* as part of their due diligence process.

In addition to their Codes, the Entities aim to identify and mitigate all human rights risks by:

- Implementing policies, procedures, and management systems for recruitment that require formal, auditable approval procedures, including verification of the candidate's identity and their right to work in Canada legally.
- Implementing a due diligence process to evaluate key subcontractors and business partners for ethics and compliance.
- Conducting health and safety workplace inspections in order to identify any hazards or conditions that may lead to substandard work conditions. In accordance with the Entities' Health and Safety Policy, inspections are conducted on a weekly basis using the workplace inspection program to address site-specific hazards.

C. FORCED LABOUR AND CHILD LABOUR RISKS

The Entities are committed to combating the use of forced labour and child labour. This commitment is an essential part of our core values and a fundamental principle that shapes our daily operations. We expect our business partners, suppliers, contractors, and clients to share our dedication to ethical standards.

We understand that the construction industry is susceptible to the risks of forced labour and child labour. As detailed in this report, we adopted a proactive approach and have implemented various policies, processes, and practices to help manage and prevent forced labour and child labour risks in our supply chain. We are now focused on improving and enhancing our practices in order to avoid, prevent, and mitigate these risks. Our approach, due diligence, and assurance are facilitated by collaboration between

specialist functions within the Entities, including Human Resources, Procurement, Legal, and Health and Safety.

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 Entities that procure goods and services from Canada and abroad, we are committed to avoiding purchasing "at-risk" goods and services that may unintentionally contribute to the use of forced labour and child labour. We achieve this through utilizing a suite of agreement templates and contracts for our main subcontractors and adherence to the *Code of Conduct for Business Partners* by them.

We recognize that our role in preventing forced labour and child labour extends beyond our organization, and we are proud of our efforts to foster a sustainable and ethical construction industry.

D. REMEDIATION MEASURES

The Entities have not identified instances of forced or child labour in our activities or supply chains. Therefore, no remediation measures have been taken.

In this regard, the Entities encourage a culture of open communication among our employees, subcontractors, and other third parties to report any potentially unethical or illegal practices. To facilitate this, our Entities have established various communication channels where employees and third parties can raise their concerns.

One of these channels is the [Ethics Channel](#), a grievance mechanism available 24/7 to all employees and third parties to report misconduct that may violate our *Code of Business Ethics and Code of Conduct*, policies, or laws. We worked on implementing the Ethics Channel, which is meant to be secure, accessible, free of charge, and administered by a third party. Reports were to be set up to allow them being made anonymously, and with a strict commitment to non-retaliation.

E. REMEDIATION OF LOSS OF INCOME

We have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

F. TRAINING

The Entities are committed to providing comprehensive training to all their employees. As part of our onboarding process, new hires are required to complete mandatory training as soon as they join the Project. Employees have received emails presenting the *Code of Business Ethics and Code of Conduct* and new hires have the *Code of Business Ethics and Code of Conduct* included in their welcome package.

Compliance with the *Code of Business Ethics and Code of Conduct* is mandatory for all employees.

Additionally, parent corporations of GNPIAT/CNPIAT have regular training programs where, among other topics, employees are trained on compliance in relation to the protection of human rights.

Regarding our supply chain, in 2023, we communicated our *Code of Conduct for Business Partners* to our key subcontractors and vendors. We will continue to emphasize our commitments in this area.

G. ASSESSING EFFECTIVENESS

Our assessment of effectiveness will be evidence-based and include the achievement of annual objectives, and internal audit results, monitoring and closeout of corrective action plans, training participation rates, communications engagement, completion of improvement plans and responsiveness to grievances and monitoring corrective actions.

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

The Entities maintain a strong commitment to ethical and legal business practices, and we unequivocally condemn the use of forced labour and child labour in our operations, as well as those of our suppliers and subcontractors. We hold ourselves to the highest possible standards and expect all employees, contract workers, officers and directors, and business partners to conduct themselves with integrity, always adhering to the letter and spirit of all applicable laws, regulations, and rules.

In 2023, we took several actions to enhance our capabilities to identify, mitigate, and prevent the risks of human rights violations, including forced labour and child labour, across our operations and supply chain and to respond effectively to any impacts that may arise. These actions included, but were not limited to:

Policies and Procedures

- Continued integration of our *Code of Business Ethics and Code of Conduct* and *Code of Conduct for Business Partners* across the Entities, which set out our ethics and legal business commitment. We focused on implementing these Codes in the Project, incorporating them into agreement templates, including requirements to adhere to our ethical and compliance policies or to have equivalent standards, among other actions.
- We Included a reference to prohibiting the use of forced labour, slave labour or other forms of involuntary labour at work sites in the *Code of Conduct for Business Partners*.

Risk Assessment

- Diverse risk assessments were carried out at the parent corporation levels of the Entities, including evaluations of human rights impact, anti-corruption risks, and criminal compliance risks, among others.

Due Diligence

- Recruitment and hiring processes and controls which ensure that all workers are recruited voluntarily.
- Conducting criminal background checks for all prospective employees.

Awareness and Training

- We worked on the implementation of the **Ethics Channel** through our SharePoint.
- Communicating the principles of the Entities' *Code of Conduct for Business Partners* amongst key subcontractors and vendors through emails.
- Parent companies of the Entities are committed to complying with the law to the same extent as the Entities, having their own sets of codes.

IV. CONCLUSION

The Entities are committed to preventing forced labour or child labour from taking place in our business and in our supply chains. We will continue to review our policies, procedures, and practices periodically to determine any enhancements we can make to help prevent forced labour or child labour.