

#### 1. Introduction

This report is being issued by Kicking Horse Canyon Constructors (GP) (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.

# 2. Structure, Activities and Supply Chains

## Structure and Activities

The Entity is a general partnership existing under the laws of British Columbia. The general partners of the Entity are Aecon Constructors, a division of Aecon Construction Group Inc. (the "Managing Party") and Parsons Inc. and Emil Anderson Construction (EAC) Inc.

The Entity was formed as a special purpose vehicle to construct Phase 4 of the Kicking Horse Canyon Project to upgrade approximately 4.8 kilometres of highway through the Kicking Horse canyon to improve safety East of Golden, British Columbia (the "Project"). The Project is located in Golden, British Columbia, and the Entity does not have any material business activities outside of British Columbia. The Entity's activities relate principally to those connected to the Project, and other activities that are ancillary to that purpose. Those construction activities include the realignment of 13 curves and widening the highway to four lanes with median barrier and wider shoulders to accommodate cyclists. Mitigate rock fall and avalanche hazards with bridges, rock catchment ditches and other measures. Add wildlife exclusion fencing and wildlife passage opportunities to reduce vehicle-animal collisions.

## Supply Chain

Pursuant to the Partnership Agreement (the "Agreement"), the Entity relies on the Managing Party to provide support services including the review and administration of all new supplier setups by a centralized corporate vendor master team. A copy of the Managing Party report pursuant to the Act is available on their website <a href="https://www.aecon.com/resources">https://www.aecon.com/resources</a>.

## 3. Policies and Due Diligence Processes Relating to Forced and Child Labour

As described above, the Entity relies on the Managing Party for matters relating to procurement and subcontracting. Accordingly, the Entity does not have any separate policies or due diligence processes relating to forced or child labour.

## 4. Risk Assessment and Mitigating Actions

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 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.



## 5. Steps taken in the previous year to prevent and reduce risks of forced labour and child labour

As described 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.

#### 6. Remediation Acts

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, the Entity has taken no remediation measures to date. 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.

# 7. 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.

## 8. Assessment of effectiveness of steps taken

Given that the Entity is a special purpose vehicle that 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.

## **APPROVAL AND ATTESTATION**

This report was approved by the Executive Committee of the Entity on May 29, 2024, pursuant to section 11(4)(a) 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 Kicking Horse Canyon Constructors (GP) and not in my personal capacity.

Name: Joop van der Wal Title: Project Director

I have the authority to bind the Entity.